



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 1  
5 Post Office Square, Suite 100  
BOSTON, MA 02109-3912

SEP 30 2010

Russell Dean, Town Manager  
Town Office  
10 Front Street  
Exeter, NH 03833



Re: NPDES Permit No. NH0100871  
Administrative Order No. 10-024

Dear Mr. Dean:

Enclosed is an Administrative Order ("Order") issued to the Town of Exeter, New Hampshire ("Town" or "Exeter") pursuant to Sections 308 and 309(a)(3) of the Clean Water Act, 33 U.S.C. §§ 1318 and 1319(a)(3). The Order is based upon violations of the above-referenced National Pollutant Discharge Elimination System ("NPDES") permit and Section 301(a) of the Clean Water Act ("Act"), 33 U.S.C. § 1311(a).

The NPDES permit prohibits combined sewer overflow ("CSO") discharges that cause water quality standards violations and requires annual E. coli bacteria monitoring of the CSO outfall discharges to Clemson Pond. Water quality standards violations attributable to Exeter's CSO outfall discharges documented by the data collected by the New Hampshire Department of Environmental Services ("NHDES") and the Town's failure to annually monitor discharges from its CSO outfall are violations of the NPDES Permit. Although Exeter has worked to separate the combined sewer system, untreated overflows from the Town's collection system continue to occur. Standards violations, therefore, also continue. Exeter has also reported numerous sanitary sewer overflows ("SSOs") from its collection system to waterways from locations for which the Town is not authorized by its NPDES Permit to discharge pollutants.

The Order requires the Town to submit to EPA and to the NHDES a Scope of Work and schedule for preparing a draft Long-Term CSO Abatement Program. The program must recommend a plan and a proposed schedule for addressing all remaining CSO outfall discharges to result in full NPDES permit compliance and compliance with New Hampshire's water quality standards as soon as practicable.

The Order also includes the following requirements: (1) an assessment of the Town's Collection System Capacity, Management, Operation and Maintenance ("CMOM") programs; (2) preparation and submission of a CMOM corrective action plan including a proposed implementation schedule to prevent SSOs in the future; (3) annual CMOM program implementation reporting; (4) a CMOM reassessment in the third year; and (5) quarterly work progress/work projections reporting.

If you have any questions concerning the terms of this Order, please contact Joy Hilton of the Water Technical Unit at (617) 918-1877 or have your attorney contact Michael Wagner at (617) 918-1735.

Sincerely,



Susan Studlien, Director  
Office of Environmental Stewardship

Enclosure

cc: Michael Jeffers, Exeter  
Tracy Wood, NHDES

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I**

IN THE MATTER OF:	)	DOCKET NO. 010-024
	)	
	)	FINDINGS OF VIOLATION
Exeter, New Hampshire	)	
NPDES Permit No. NH0100871	)	AND
	)	
Proceedings under Sections 308 and	)	ORDER FOR COMPLIANCE
309(a)(3) of the Clean Water Act,	)	
as amended, 33 U.S.C. §§ 1318 and	)	
1319(a)(3)	)	

**I. STATUTORY AUTHORITY**

The following Findings are made and ORDER issued pursuant to Sections 308(a) and 309(a)(3) of the Clean Water Act, as amended (the "Act"), 33 U.S.C. §§ 1318 and 1319(a)(3). Section 309(a)(3) of the Act grants to the Administrator of the U.S. Environmental Protection Agency ("EPA") the authority to issue orders requiring persons to comply with Sections 301, 302, 306, 307, 308, 318 and 405 of the Act and any permit condition or limitation implementing any of such sections in a National Pollutant Discharge Elimination System ("NPDES") permit issued under Section 402 of the Act, 33 U.S.C. § 1342. Section 308(a) of the Act, 33 U.S.C. § 1318(a), authorizes EPA to require the submission of any information required to carry out the objectives of the Act. These authorities have been delegated to EPA Region I's Regional Administrator, and in turn to the Director of EPA of the Office of Environmental Stewardship ("Director").

The Order herein is based on findings of violation of Section 301 of the Act, 33 U.S.C. § 1311, and the conditions of NPDES Permit No. NH0100871. Pursuant to Section 309(a)(5)(A) of the Act, 33 U.S.C. § 1319(a)(5)(A), the Order provides a schedule for compliance which the Director has determined to be reasonable.

## II. DEFINITIONS

Unless otherwise defined herein, terms used in this Order shall have the meaning given to those terms in the Act, 33 U.S.C. § 1251 *et. seq.*, the regulations promulgated thereunder, and any applicable NPDES permit. For the purposes of this Order, "NPDES Permit" means the Town of Exeter's NPDES Permit, No. NH0100871, and all amendments or modifications thereto, and renewals thereof as are applicable, and in effect at the time.

## III. FINDINGS

The Director makes the following findings of fact:

1. The Town of Exeter, New Hampshire ("Town" or "Exeter") is a municipality, as defined in Section 502(4) of the Act, 33 U.S.C. § 1362(4).
2. The Town is a person under Section 502(5) of the Act, 33 U.S.C. § 1362(5).
3. The Town is the owner and operator of a Publicly-Owned Treatment Works ("POTW") which includes a wastewater collection system ("Collection System"), a wastewater treatment facility ("WWTF") and one combined sewer overflow ("CSO") from which it discharges pollutants, as defined in Section 502(6) and (12) of the Act, 33 U.S.C. §§ 1362(6) and (12), from point sources, as defined in Section 502(14) of the Act, 33 U.S.C. § 1362(14).
4. The WWTF discharges into the Squamscott River via Outfall No. 001 and the CSO discharges flow into Clemson Pond through Outfall No. 003. Clemson Pond flows into the Squamscott River, then to Great Bay and then the Atlantic Ocean. All are waters of the United States as defined in 40 CFR § 122.2 and navigable waters under Section 502(7) of the Act, 33 U.S.C. § 1362(7).
5. On July 5, 2000, the Town was issued NPDES Permit No. NH0100871 ("NPDES Permit") by the Director of the Office of Ecosystem Protection of EPA, Region I, under the authority of Section 402 of the Act, 33 U.S.C. § 1342. The NPDES Permit became effective on September 25, 2000,

expired on September 24, 2005 but was administratively continued pursuant to 40 CFR § 122.6.

6. Parts I.A.3. and I.B. of the NPDES Permit establish effluent limitations and require annual monitoring of the discharges from Outfall No. 003.
7. The Town has failed to annually monitor its untreated CSO discharges from Outfall No. 003 to Clemson Pond for *Escherichia coli* ("E. coli") bacteria.
8. Data collected by the New Hampshire Department of Environmental Services ("NHDES") documents that discharges from the Town's CSO outfall exceed the NHDES' State Water Quality Standard for E. Coli bacteria.
9. Since August 27, 2005, the Town has discharged untreated sewage from various components of its Collection System to the Exeter River, the wetlands tributary to the Little River, the Dearborn Brook, Clemson Pond and the Squamscott River.
10. Untreated sewage contains pollutants as defined in Sections 502(6) and (12) of the Act, 33 U.S.C. §§ 1362(6) and (12).
11. The various components of the Collection System from which the Town has discharged untreated sewage to the Exeter River, the wetlands tributary to the Little River, the Dearborn Brook, Clemson Pond and the Squamscott River are point sources.
12. The Exeter River, the wetlands tributary to the Little River, the Dearborn Brook, Clemson Pond and the Squamscott River are all waters of the United States as set forth at 40 C.F.R. § 122.2 and navigable waters under Section 502(7) of the Act, 33 U.S.C. § 1362(7).
13. The Town's discharge of pollutants from components of the Collection System other than Outfall No. 003 to waters of the United States are not authorized by the Town's NPDES Permit.
14. Section 301(a) of the Act, 33 U.S.C. § 1311(a), makes unlawful the discharge of pollutants to waters of the United States except in compliance with the terms and conditions of an NPDES permit issued

pursuant to Section 402 of the Act, 33 U.S.C. § 1342.

#### IV. ORDER

Accordingly, pursuant to Sections 308 and 309(a)(3) of the Act, it is hereby ordered that:

##### CSO Monitoring Plan

1. Within 60 days of receipt of this Order, the Town shall submit to the EPA and NHDES for approval a plan for annually monitoring its CSO discharges in accordance with Section I.A.3. of its NPDES Permit. The Town shall implement the plan upon its approval by the EPA after EPA's consultation with the NHDES.

##### CSO Abatement Planning Requirements

2. Within 180 days of receipt of this Order, the Town shall submit to the EPA and NHDES for review and approval a draft scope of work ("SOW"), including a schedule, for preparing a Long-Term CSO Control Plan ("Draft LTCP"). The draft LTCP shall conform to the EPA's *Combined Sewer Overflow Control Policy* (Federal Register, Vol. 59, No. 75, pp. 18688-18698, April 14, 1994). The Town shall also meet the requirements of Section Env-Wq 1703.05 Combined Sewer Overflows of the New Hampshire Code of Administrative Rules.
3. The SOW shall be incorporated and enforceable hereunder upon its approval by, and as amended by, EPA.
4. Within 180 days of receipt of this Order, provide the following for all events that occurred since January 1, 2006, inclusive:
  - a. a listing and description of all unauthorized discharges, overflows, spills, releases, or discharges of raw or partially-treated wastewater to surface waters from the Town's Collection System that occurred during dry weather from locations at which the Town is authorized by its NPDES permit to discharge combined sewer overflows

("CSOs"). The listing shall be organized chronologically and shall include all such unauthorized discharges regardless of cause, including, but not limited to, roots, grease, debris, and vandalism blockages as well as mechanical, electrical, and structural failures.

b. a listing and description of all Collection System overflows, spills, releases including building/private property backups and all releases with a reasonable potential to reach surface waters such as releases to streets or areas with storm drain catch basins, or discharges of raw or partially-treated wastewater from the Town's Collection System that occurred during dry weather from locations for which the Town is not authorized to discharge pollutants. The listing shall be organized chronologically and shall include all such unauthorized discharges regardless of cause, including, but not limited to roots, grease, debris, and vandalism blockages as well as mechanical, electrical, and structural failures.

c. a listing and description of all Collection System overflows, spills, releases including building/private property backups and all releases with a reasonable potential to reach surface waters such as releases to streets or areas with storm drain catch basins, or discharges of raw or partially-treated wastewater to surface waters that have occurred during, or as a result of, wet weather from locations for which the Town is not authorized by its NPDES permit to discharge wastewater. The listing and descriptions shall be organized chronologically and shall include all such unauthorized discharges regardless of cause, including, but not limited to infiltration/inflow, roots, grease, debris, and vandalism blockages as well as structural, mechanical, and electrical failures.

5. The listings provided pursuant to Paragraphs IV.4.a. through 4.c. of this Order shall also include:

a. the dates and times on which each event began and was stopped, or if it is continuing, a schedule for its termination;

- b. the location (nearest address) of each such event;
- c. the source of the notification (property owner, field crew, police);
- d. the cause of the event, including but not limited to, whether it was caused by debris, fats, oils, and grease, or root blockages, collapsed pipes, mechanical, electrical and structural failures, hydraulic overloads and/or vandalism;
- e. whether the event was determined to be caused by blockages, hydraulic limitations, mechanical, structural, or electrical failures within the publicly-owned portion of the Town's Collection System;
- f. the estimated gallons of wastewater released, and the method used to estimate the volume;
- g. a description of the ultimate fate of the overflow including whether it occurred in buildings or on private property, to the ground, to the street, and whether it discharged to a surface water including the name of the surface water. If the release occurred to the ground or street, provide the location of the nearest down-gradient stormwater catch basin and the name of the receiving water for that portion of the stormwater collection system;
- h. the estimated gallons of wastewater discharged to the stormwater collection system or surface water and the method used to estimate the volume;
- i. the measures taken to stop the overflow and prevent future overflows at the same location;
- j. the date that overflow was reported to the EPA and NHDES; and
- k. the date of the last overflow that occurred at the same location.

The Town shall provide a map of the Collection System indicating the location of each Collection System overflow that has resulted from capacity limitations or blockages in that portion of the Collection System owned by the Town.

- 6. The listings shall also be accompanied by all notifications, including internal communications such as memorandums, e-mails, phone logs,



police logs, and citizen complaints and external communications such as reports to regulatory agencies, letters, and e-mail notifications of each event.

Capacity, Management, Operation and Maintenance ("CMOM") Program Assessment

7. Within 180 calendar days of the effective date of this Order, complete and submit:
  - a. an inventory of the Town's Collection System that characterizes the age, condition, type of construction, and operation of each element of its Collection System and provides for further assessments where warranted;
  - b. an assessment of the capacity of critical elements of the Collection System; and
  - c. an assessment of the Town's operation and maintenance practices all of which shall comprise the "CMOM Program Self Assessment".

As part of the CMOM Program Self Assessment, the Town shall determine whether improvements to the Town's preventative maintenance practices are necessary in order to preserve the infrastructure of the Collection System and to prevent future overflows from the Collection System. The CMOM Program Self Assessment shall be conducted in accordance with EPA's Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems (EPA 305-B-05-002, January 2005) (which is available on-line at [http://www.epa.gov/npdes/pubs/cmom\\_guide\\_for\\_collection\\_systems.pdf](http://www.epa.gov/npdes/pubs/cmom_guide_for_collection_systems.pdf)). As part of the CMOM Program Self Assessment, the Town shall complete and submit the Wastewater Collection System CMOM Program Self-Assessment Checklist (the "CMOM Program Self-Assessment Checklist") in Attachment 1, which is a Region 1 modification of the checklist that accompanies the CMOM guidance document.

### CMOM Corrective Action Plan

8. Within 270 calendar days of the effective date of this Order, submit a plan (the "CMOM Corrective Action Plan") that shall include the following:
  - a. a list of any deficiencies identified by the CMOM Program Self-Assessment;
  - b. a list of causes and contributing factors that lead to the overflows identified in response to this Order and the CMOM Program Self-Assessment Checklist;
  - c. a description of the specific short and long-term actions that the Town is taking, or plans to take, to address any of the deficiencies identified during the completion of the CMOM Program Self-Assessment Checklist; and
  - d. a schedule for implementation of the CMOM Corrective Action Plan (the "CMOM Corrective Action Plan Implementation Schedule").
9. The CMOM Corrective Action Plan Implementation Schedule shall be incorporated and enforceable hereunder upon approval by, and as amended by, EPA and the NHDES.

### CMOM Program Document

10. Within 365 calendar days of the effective date of this Order, consolidate all of the Collection System preventative and reactive maintenance programs and Collection System capital improvement plans into a single CMOM Program document. The CMOM Program document shall be maintained at a location that is readily accessible to the Town's maintenance staff, and is available for inspection by EPA and the NHDES.
11. Until further notice, beginning January 31, 2012, and each January 31<sup>st</sup> annually thereafter, submit a report (the "CMOM Program Implementation Annual Report"), detailing the actions taken by the Town during the prior calendar year, or known by the Town to have been taken by other parties, to resolve the deficiencies identified in the CMOM Corrective Action Plan

and to comply with this Order. The CMOM Program Implementation Annual Report shall also include:

- a. a summary listing of all unauthorized discharges, overflows, spills, and releases that have occurred during the previous calendar year, including building/private property backups that result from capacity limitations or blockages in that portion of the Collection System owned by the Town. The tabular listing shall be organized chronologically and shall include:
  - i. the dates and times on which each event began and was stopped, or if it is continuing, a schedule for its termination;
  - ii. the location (nearest address) of each such event;
  - iii. the source of the notification (property owner, field crew, police);
  - iv. the cause of the event, including but not limited to, whether it was caused by debris, fats, oils, and grease, or root blockages, collapsed pipes, mechanical, electrical and structural failures, hydraulic overloads and/or vandalism;
  - v. the estimated gallons of wastewater released, and the method used to estimate the volume;
  - vi. a description of the ultimate fate of the overflow including whether it occurred in a building, on private property, the ground, to the street, and whether it discharged to a surface water including the name of the surface water. If the release occurred to the ground or street, provide the location of the nearest down-gradient stormwater catch basin and the name of the receiving water for that portion of the stormwater collection system;
  - vii. the estimated gallons of wastewater discharged to the storm sewer system or surface water and the method used to estimate the volume;

- viii. the measures taken to stop the overflow and prevent future overflows at the same location;
- ix. the date that overflow was reported to the EPA and NHDES;  
and
- x. the date of the last overflow at the same location.

The location of each event included in the summary listing shall also be noted on a map of the Town's Collection System.

- b. a description of the measures and programs implemented by the Town to resolve any of the deficiencies identified pursuant to Paragraphs IV.7. and IV.8. of this Order and to reduce the frequency, duration and volume of unauthorized discharges, overflows, spills, and releases from the Town's Collection System during the previous calendar year including copies of any contracts signed by the Town to address any issues identified in the CMOM Corrective Action Plan. The report shall also include a description of the activities that the Town has implemented to measure the effect and success of its efforts;
- c. a description of the type of the Town's Collection System mapping (i.e. GIS, paper) and the last date the map(s) was updated;
- d. copies of the annual Collection System operation and maintenance budgets for the current and previous fiscal year noting the source of the funding – enterprise fund, general tax rate. Specifically indicate whether a capital replacement fund ("sinking fund") has been established to provide for replacement of aging wastewater Collection System infrastructure. Provide the Collection System maintenance staffing levels for the current fiscal year including:
  - i. budgeted positions;
  - ii. vacant positions; and
  - iii. a brief description of the responsibilities of each position clearly distinguishing Collection System maintenance

responsibilities from responsibilities for the WWTF and other public works operations.

- e. a description of any existing or proposed Town programs designed to reduce the levels of extraneous flows that enter the Town's Collection System and the specific measures that were taken by the Town under these programs during the past calendar year including whether properties are inspected during the property transfer process to determine whether infiltration/inflow sources are tied into the Collection System;
- f. a description of any existing or proposed Town easement maintenance programs for locating and uncovering lost or buried Collection System manholes and the specific measures that were taken by the Town under these programs during the past calendar year; and
- g. a projection of the measures that will be taken during the current calendar year to resolve any deficiencies identified in the CMOM Corrective Action Plan and to comply with this Order.

Third Year CMOM Program Self-Assessment Checklist

- 12. Three years from the effective date of this Order, submit an updated CMOM Program Self-Assessment Checklist in addition to the annual report required pursuant to Paragraph 11. of this Order.

Quarterly Progress Reports and Work Projections.

- 13. Beginning with the quarter ending December 31, 2010 and continuing through the calendar quarter ending December 31, 2014, submit quarterly reports on the Town's progress in implementing the provisions of this Order. The reports shall be submitted by the last day of the month following the calendar quarter monitoring period. At a minimum, these progress reports shall include a description of:

- a. Activities undertaken during the reporting period directed at achieving compliance with this Order;
- b. A summary of the status of all plans, reports, and other deliverables required by this Order that the Town completed and submitted during the reporting period; and
- c. Expected activities completed during the next reporting period in order to achieve compliance with this Order.

## **V. NOTIFICATION PROCEDURE**

1. Where this Order requires a specific action to be performed within a certain time frame, the Town shall submit a written notice of compliance or noncompliance with each deadline. Notification must be mailed within fourteen (14) days after each required deadline. The timely submission of a required report shall satisfy the requirement that a notice of compliance be submitted.
2. If noncompliance is reported, notification should include the following information:
  - a. A description of the noncompliance;
  - b. A description of any actions taken or proposed by the Town to comply with the lapsed schedule requirements;
  - c. A description of any factors that explain or mitigate the noncompliance; and
  - d. An approximate date by which the Town will perform the required action. After a notification of noncompliance has been filed, compliance with the past-due requirement shall be reported by submitting any required documents or providing EPA with a written report indicating that the required action has been achieved.
3. Submissions required by this Order shall be in writing and shall be mailed to the following addresses:

U.S. Environmental Protection Agency, Region I  
5 Post Office Square, Suite 100 (OES04-3)  
Boston, MA 02109-3219  
Attn: Joy Hilton

and

New Hampshire Department of Environmental Services  
Wastewater Engineering Bureau  
29 Hazen Drive – P.O. Box 95  
Concord, NH 03302-0095  
Attn: Tracy L. Wood, P.E.

## **VI. GENERAL PROVISIONS**

1. The Town may, if it desires, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 203(b). Information covered by such a claim will be disclosed by EPA only to the extent set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to the Town. The Town should carefully read the above-cited regulations before asserting a business confidentiality claim since certain categories of information are not properly the subject of such a claim. For example, the Act provides that "effluent data" shall in all cases be made available to the public. See Section 308(b) of the Act, 33 U.S.C. § 1318(b).
2. This Order does not constitute a waiver or a modification of the terms and conditions of the NPDES Permit. The NPDES Permit remains in full force and effect. EPA reserves the right to seek any and all remedies available under Section 309 of the Act, 33 U.S.C. § 1319, as amended, for any violation cited in this Order.

3. This Order shall become effective upon receipt by the Town.

09/30/10  
Date

Susan Studlien  
Susan Studlien, Director  
Office of Environmental Stewardship  
Environmental Protection Agency, Region I



## Attachment 1

### United States Environmental Protection Agency, EPA New England

#### Wastewater Collection System CMOM Program Self-Assessment Checklist

April 2008

Name of your system \_\_\_\_\_ Date \_\_\_\_\_

Put an "A" in the final column for an issue you intend to address with future action, or leave blank if you have evaluated your program as sufficient.

#### I. General Information – Collection System Description

I	Question	Response	*Act
1	How many people are served by your wastewater collection system?		
2	What is the number of service connections to your collection system? How many: Manholes? Pump stations? Feet (or miles) of sewer? Force mains? Siphons?		
3	What is the age of your system (e.g., 30% over 30 years, 20% over 50 years, etc.)?		
4	What type(s) of collection system map is/are available and what percent of the system is mapped by each method (e.g., paper only, paper scanned into electronic, digitized, interactive GIS, etc.)? When was the map(s) last updated?		
5	If you have a systematic numbering and identification method/system established to identify sewer system manhole, sewer lines, and other items (pump stations, etc.), please describe.		
6	Are "as-built" plans (record drawings) or maps available and used by field crews in the office and in the field?		
7	Describe the type of asset management (AM) system you use (e.g. card catalog, spreadsheets, AM software program, etc.)		

#### II. Continuing Sewer Assessment Plan

II	Question	Response	*Act
1	Under what conditions, if any, does the collection system overflow? Does it overflow		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

	<p>during wet and/or dry weather?          Has your system had problems with: <input type="checkbox"/> hydraulic issues, <input type="checkbox"/> debris, <input type="checkbox"/> roots, <input type="checkbox"/> Fats, Oils &amp; Grease (FOG), <input type="checkbox"/> vandalism blockages resulting in manhole overflows, <input type="checkbox"/> basement backups, <input type="checkbox"/> other (specify)?          Describe your system's history of structural collapses, and PS or force main failures.</p>		
2	<p>How many SSOs have occurred in each of the last three calendar years? What is the most frequent cause?</p>		
3	<p>Of those SSOs, how many basement backups occurred in each of the last three calendar years? How are they documented?</p>		
4	<p>What is the ratio of peak wet-weather flow to average dry-weather flow at the wastewater treatment plant or municipal boundary for satellite collection systems?</p>		
5	<p>What short-term measures have been implemented or plan to be implemented to mitigate the overflows? If actions are planned, when will they be implemented?</p>		
6	<p>What long-term measures have been implemented or plan to be implemented to mitigate the overflows? If actions are planned, when will they be implemented?</p>		
7	<p>Describe your preventive maintenance program; how do you track it (e.g., card files, electronically, with specific software)?</p>		
8	<p>How do you prioritize investigations, repairs and rehabilitation? What critical and priority problem areas are addressed more frequently than the remainder of your system? How frequent are these areas evaluated?</p>		
9	<p>Are septage haulers required to declare the origin of their "load"? Are records of these declarations maintained? Do any of the declarations provide evidence of SSOs?</p>		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

### III.A. Collection System Management Organizational Structure

IIIA	Question	Response	*Act
1	Do you have an organizational chart that shows the overall personnel structure for collection system operations, including operation and maintenance staff? Please attach your chart.		
2	For which jobs do you have up-to-date job descriptions that delineate responsibilities and authority for each position?		
3	How many staff members are dedicated to collection system maintenance? Of those, how many are responsible for any other duties, (e.g., road repair or maintenance, O&M of the storm water collection system)?		
4	Are there any collection system maintenance position vacancies? How long has the position(s) been vacant?		
5	For which, if any, maintenance activities do you use an outside contractor?		
6	Describe any group purchase contracts you participate in.		

### III.B. Collection System Management: Training

IIIB	Question	Response	*Act
1	What types of training are provided to staff?		
2	Is training provided in the following areas: <input type="checkbox"/> general safety, <input type="checkbox"/> routine line maintenance, <input type="checkbox"/> confined space entry, <input type="checkbox"/> MSDS <input type="checkbox"/> lockout/tagout, <input type="checkbox"/> biologic hazards, <input type="checkbox"/> traffic control, <input type="checkbox"/> record keeping, <input type="checkbox"/> electrical and instrumentation, <input type="checkbox"/> pipe repair, <input type="checkbox"/> public relations, <input type="checkbox"/> SSO/emergency response, <input type="checkbox"/> pump station operations and maintenance, <input type="checkbox"/> trench/shoring, <input type="checkbox"/> other (describe)?		
3	Which training requirements are mandatory for key employees?		
4	How many collection system employees are certified (e.g., NEWEA certification program) and at what grade are they certified?		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

### III.C. Collection System Management: Communication and Customer Service

IIIC	Question	Response	*Act
1	Describe your public education/outreach programs (e.g., for user rates, FOG, extraneous flow, SSOs etc.)?		
2	What are the most common collection system complaints? How many complaints have you received in each of the past three calendar years?		
3	Are formal procedures in place to evaluate and respond to complaints?		
4	How are complaint records maintained (i.e., computerized)? How are complaints tied to emergency response and operations and maintenance programs?		

### III.D. Collection System Management: Management Information Systems

IIID	Question	Response	*Act
1	How do you manage collection system information? (Commercial software package, spreadsheets, data bases, SCADA, etc). What information and functions are managed electronically?		
2	What procedures are used to track and plan collection system maintenance activities?		
3	Who is responsible for establishing maintenance priorities? What records are maintained for each piece of mechanical equipment within the collection system?		
4	What is the backlog for various types of work orders?		
5	How do you track emergencies and your response to emergencies? How do you link emergency responses to your maintenance activities?		
6	What written policies/protocols do you have for managing and tracking the following information: complaint work orders, scheduled work orders, customer service, scheduled preventative maintenance, scheduled inspections, sewer system inventory, safety incidents, emergency		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

	responses, scheduled monitoring/sampling, compliance/overflow tracking, equipment/tools tracking, parts inventory?		
--	--	--	--

### III.E. Collection System Management: SSO Notification Program

III E	Question	Response	*Act
1	What are your procedures, including time frames, for notifying state agencies, health agencies, regulatory authorities, and the drinking water authorities of overflow events?		
2	Do you use the state standard form for recording/reporting overflow events? If not, provide a sample copy of the form that is used.		

### III.F. Collection System Management: Legal Authority

III F	Question	Response	*Act
1	Are discharges to the sewer regulated by a sewer use ordinance (SUO)? Does the SUO contain procedures for controlling and enforcing the following: <input type="checkbox"/> FOG; <input type="checkbox"/> Infiltration/Inflow (I/I); <input type="checkbox"/> building structures over the sewer lines; <input type="checkbox"/> storm water connections to sanitary lines; <input type="checkbox"/> defects in service laterals located on private property; <input type="checkbox"/> sump pumps?		
2	Who is responsible for enforcing various aspects of the SUO? Does this party communicate with your department on a regular basis?		
3	Summarize any SUO enforcement actions/activities that have occurred in the last three calendar years.		
4	Do you have a program to control FOG entering the collection system? If so, which of the following does it include: <input type="checkbox"/> permits, <input type="checkbox"/> inspection <input type="checkbox"/> enforcement? Are commercial grease traps inspected regularly and who is responsible for conducting inspections?		
5	Is there an ordinance dealing with storm water connections or		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

	requirements to remove storm water connections?		
6	Does the collection system receive flow from satellite communities? Which communities? How are flows from these satellite communities regulated? Are satellite flow capacity issues periodically reviewed?		
7	Does the collection system receive flow from private collection systems? If yes, how is flow from these private sources regulated? How are overflows dealt with?		

**IV.A. Collection System Operation: Financing**

IV A	Question	Response	*Act
1	Has an enterprise (or other) fund been established and what does it include: wastewater collection and treatment operations; collection system maintenance; long-term infrastructure improvements; etc.? Are the funds sufficient to properly fund future system needs?		
2	How are rates calculated (have you done a rate analysis)? What is the current sewer charge rate? When was it last increased? How much was the increase?		
3	What is your O&M budget?		
4	If an enterprise fund has not been established, how are collection system maintenance operations funded?		
5	Does a Capital Improvement Plan (CIP) that provides for system repair/replacement on a prioritized basis exist? What is the collection system's average annual CIP budget?		
6	How do you account for the value of your system infrastructure for the Government Accounting Standards Board standard 34 (GASB 34)?		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

#### IV.B. Collection System Operation: Hydrogen Sulfide Monitoring and Control

IV B	Question	Response	*Act
1	Are odors a frequent source of complaints? How many have been received in the last calendar year?		
2	Do you have a hydrogen sulfide problem, and if so, do you have corrosion control programs? What are the major elements of the program?		
3	Does your system contain air relief valves at the high points of the force main system? How often are they inspected? How often are they exercised?		

#### IV.C. Collection System Operation: Safety

IV C	Question	Response	*Act
1	Do you have a formal Safety Training Program? How do you maintain safety training records?		
2	Which of the following equipment items are available and in adequate supply: <input type="checkbox"/> rubber/disposable gloves; <input type="checkbox"/> confined space ventilation equipment; <input type="checkbox"/> hard hats, <input type="checkbox"/> safety glasses, <input type="checkbox"/> rubber boots; <input type="checkbox"/> antibacterial soap and first aid kit; <input type="checkbox"/> tripods or non-entry rescue equipment; <input type="checkbox"/> fire extinguishers; <input type="checkbox"/> equipment to enter manholes; <input type="checkbox"/> portable crane/hoist; <input type="checkbox"/> atmospheric testing equipment and gas detectors; <input type="checkbox"/> oxygen sensors; <input type="checkbox"/> H2S monitors; <input type="checkbox"/> full body harness; <input type="checkbox"/> protective clothing; <input type="checkbox"/> traffic/public access control equipment; <input type="checkbox"/> 5-minute escape breathing devices; <input type="checkbox"/> life preservers for lagoons; <input type="checkbox"/> safety buoy at activated sludge plants; <input type="checkbox"/> fiberglass or wooden ladders for electrical work; <input type="checkbox"/> respirators and/or self-contained breathing apparatus; <input type="checkbox"/> methane gas or OVA analyzer; <input type="checkbox"/> LEL metering?		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

#### IV.D. Collection System Operation: Emergency Preparedness and Response

IV D	Question	Response	*Act
1	Do you have a written collection system emergency response plan? When was the plan last updated? What departments are included in your emergency planning?		
2	Which of the following issues are considered: <input type="checkbox"/> vulnerable points in the system, <input type="checkbox"/> severe natural events, <input type="checkbox"/> failure of critical system components, <input type="checkbox"/> vandalism or other third party events (specify), <input type="checkbox"/> other types of incidents (specify)?		
3	How do you train staff to respond to emergency situations? Where are responsibilities detailed for personnel who respond to emergencies?		
4	How many emergency calls have you had in the past calendar year?		

#### IV.E. Collection System Operation: Engineering – Capacity

IV E	Question	Response	*Act
1	How do you evaluate the capacity of your system and what capacity issues have you identified, if any? What is your plan to remedy the identified capacity issues?		
2	What procedures do you use to determine whether the capacity of existing gravity sewer system, pump stations and force mains are adequate for new connections? Who does this evaluation?		
3	Do you charge hook up fees for new development and if so, how are they calculated?		
4	Do you have a hydraulic model of your collection system? Is it used to predict the effects of system remediation and new connections?		

#### IV.F. Collection System Operation: Pump Stations - Inspection

IV F	Question	Response	*Act
1	How many pump stations are in the system? How often are		

\* Put an "A" in the final column if this is an issue you intend to address with future action.



	pump stations inspected? How many are privately owned, and how are they inspected? Do you use an inspection checklist?		
2	Is there sufficient redundancy of equipment at all pump stations?		
3	How are pump stations monitored? If a SCADA system is used, what parameters are monitored?		
4	How many pump station/force main failures have you had in each of the last three years? Who responds to pump station/force main failures and overflows? How are the responders notified?		
5	How many pump stations are equipped with backup power sources? How many require portable generators? How many portable generators does your system own? Explain how the portable generators will be deployed during a system-wide electrical outage.		
6	Are operation logs maintained for all pump stations? Are the lead, lag, and backup pumps rotated regularly?		
7	Is there a procedure to modify pump operations (manually or automatically) during wet weather to increase in-line storage of wet weather flows?		

**V.A. Equipment and Collection System Maintenance: Sewer Cleaning**

<b>V A</b>	<b>Question</b>	<b>Response</b>	<b>*Act</b>
1	What is your schedule for cleaning sewer lines on a system-wide basis? At this frequency, how long will it take to clean the system? How are sewer cleaning efforts documented?		
2	How many linear miles of the collection system were cleaned in each of the past 3 calendar years?		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

3	How do you identify sewer line segments that have chronic problems and should be cleaned more frequently? Is a list of these areas maintained and cleaning frequencies established?		
4	Approximately, how many collection system blockages have occurred during the last calendar year, and what were the causes?		
5	Has the number of blockages increased, decreased, or stayed the same over the past five years?		
6	What equipment is available to clean sewers? Is any type of cleaning contracted to other parties? If yes, under what circumstances?		
7	Do you have a root control program? Describe its critical components.		

**V.B. Equipment and Collection System Maintenance: Maintenance Right-of-Way**

<b>VB</b>	<b>Question</b>	<b>Response</b>	<b>*Act</b>
1	Is scheduled maintenance performed on Rights-of-Way and Easements? At what frequency? How many manholes in easement areas can not be located?		
2	Are road paving projects coordinated with the collection system operators. Are manholes paved over? How many manholes in paved areas can not be located? Describe any systems in place for locating and raising manholes that have been paved over.		

**V.C. Equipment and Collection System Maintenance: Parts Inventory**

<b>VC</b>	<b>Question</b>	<b>Response</b>	<b>*Act</b>
1	Do you have a central location for the storage of spare parts?		
2	How have critical spare parts been identified?		
3	How to you determine if adequate supplies on hand? Has an inventory tracking system been implemented?		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

**VI A. SSES: System Assessment**

VI A	Question	Response	*Act
1	Do POTW flow records or prior I/I or SSES programs indicate the presence of public/private inflow sources or sump pumps? Please Explain.		
2	If problems are related to I/I, has a Sewer System Evaluation Survey (SSES) been conducted? When? What is the status of the recommendations?		
3	Do you have a program to identify and eliminate sources of I/I into the system including private service laterals and illegal connections? If so, describe.		
4	Have private residences been inspected for sump pumps and roof leader connections?		
5	Are inspections to identify illicit connections conducted during the property transfer process?		
6	How many sump pumps and roof leaders have been identified? How many have been removed?		
7	Have follow-up homeowner inspections been conducted?		
8	What incentive programs exist to encourage residences to disconnect roof leaders & sump pumps? i.e. matching funds, etc.		
9	What disincentive programs exist to encourage residences to disconnect roof leaders & sump pumps? i.e. fines, surcharges		

**VI.B. SSES: Manhole Inspection**

VI B	Question	Response	*Act
1	Do you have a manhole inspection and assessment program?		
2	Has a formal manhole inspection checklist been developed?		
3	How many manholes were inspected during the past calendar year?		

\* Put an "A" in the final column if this is an issue you intend to address with future action.

## VII. Energy Use

VII	Question	Response	*Act
1	What is your annual energy cost for operating your system? For which pieces of equipment do you track energy use?		
2	Have you upgraded any of your pumps and motors to more energy efficient models? If so, please describe.		
3	Have you performed an energy audit in the past three years?		
4	Where do you use the most energy (fuel, electricity) in operating your collection system?		
5	If you have a treatment plant, would you be interested in participating in EnergyStar benchmarking of your treatment plant?		

## VIII. Other Actions

VIII	Question	Response	*Act
1	Describe any other actions that you plan to take to improve your CMOM Program that are not discussed above.		

\* Put an "A" in the final column if this is an issue you intend to address with future action.