

SSO/CMOM RULE

GOV'T AFFAIRS SEMINAR

MIDDLETON, WI – FEBRUARY 27, 2014

By

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WHO AFFECTED?

- **ALL SEWAGE COLLECTION SYSTEM OWNERS, PUBLIC AND PRIVATE**
- **SYSTEMS WITH BOTH SEWERS AND TREATMENT FACILITIES (e.g., POTWS)**
- **SATELLITE SYSTEMS – COLL'N SYSTEMS CONNECTED TO ANOTHER SYSTEM THAT PROVIDES TREATMENT (CUSTOMERS?)**

[NR 210.20]

YOUR RESPONSIBILITIES

- **PREVENT/REDUCE SSOs**
- **RESPOND TO SSO EVENTS**
- **REPORT SSOs**
- **CMAR RESPONSES**
- **DEVELOP CMOM**
- **IMPLEMENT CMOM**
- **POTENTIAL PERMIT REQUIREMENTS**

PERMIT VIOLATIONS

- **SSOs ARE PROHIBITED [NR 210.21]**
- **DNR ENFORCEMENT RESPONSE**
 - NOV, REFERRAL, PERMIT MODIFICATION
- **DNR ENFORCEMENT DISCRETION BASED ON:**
 - UNAVOIDABLE?
 - FEASIBLE ALTERNATIVES
 - UNUSUAL/SEVERE WEATHER
 - UNINTENTIONAL, TEMPORARY, ACCIDENT?
 - STATUS OF CMOM IMPLEMENTATION
 - OTHER SSO REDUCTION ACTIVITIES

REPORT TO DNR

- **REPORT W/IN 24-HR (phone, fax, email)**
[NR 210.21(4)]
 - **5-DAY REPORT AFTER AWARE OF OCCURRENCE (FORM 3400-184)**
http://dnr.wi.gov/topic/wastewater/documents/3400-184_ssoreportform.pdf
 - **DATE, TIME (each loc'n & day is separate overflow occurrence)**
 - **DURATION OF EVENT, VOLUME**
 - **LOCATION OF OVERFLOW; DISCHARGE TO WHERE?**

REPORT TO DNR (cont.)

- IF CONTINUING, WHEN WILL OVERFLOW BE STOPPED?
- CAUSE OF OVERFLOW (PRECIPITATION, SOIL CONDITION, ETC.)
- WERE HUMANS EXPOSED?
- STEPS TAKEN TO MITIGATE IMPACTS
- ANY BUILDING BACKUPS? (number, location, proximity to OVERFLOW location)
- **BUILDING (BASEMENT) BACKUPS**
[NR 210.22]
 - NOT SSOs
 - DNR MAY ISSUE PERMIT REQUIREMENTS IF PROBLEMS WITHIN THE COLLECTION SYSTEM

REPORT TO OTHERS

- **NOTIFY PUBLIC (CMOM EMERGENCY RESP. PLAN) [NR 210.21(5)]**
 - PROMPTLY
 - EFFECTIVELY AND EFFICIENTLY
 - LOCAL DAILY NEWSPAPER
- **NOTIFY DRINKING WATER SYSTEMS (if in permit) [NR 210.21(6)]**
- **SATELLITES MUST NOTIFY DOWNSTREAM COLLECTION AND TREATMENT SYSTEMS**

CMAR REPORTING

- **CMOM COMPLETED? (30 points, if not)**
[NR 208.05(3)(m)]
- **NO POINTS ASSESSED FOR SSO OCCURRENCES**
- **REPORT ACTION TAKEN IN RESPONSE TO SSO OCCURRENCES DURING THE YEAR IN ANNUAL CMAR** *[NR 208.06(1)(b)]*
- **EFFECTIVE FOR 2013 REPORTING YEAR**

CMOM [NR 210.23]

- **CAPACITY, MANAGEMENT, OPERATION & MAINTENANCE**
- **PROGRAM REQUIRED BY AUGUST 1, 2016**
- **ALL SYSTEMS MUST DEVELOP AND IMPLEMENT PROGRAM, INCLUDING SATELLITES**

CMOM-GEN'L STANDARDS

- **SYSTEM PROPERLY MANAGED, OPERATED & MAINTAINED**
- **SYSTEM PROVIDES ADEQUATE CAPACITY**
- **ALL FEASIBLE STEPS TAKEN TO ELIMINATE/REDUCE I/I, CEASE SSOs, MITIGATE EFFECTS OF SSOs**
- **PROCESS IN PLACE TO NOTIFY AFFECTED PARTIES**
- **ANNUAL REPORTS SUBMITTED (NR 208/CMAR)**

CMOM TRAINING

- **SUMMER 2014 TRAINING PLANNED BY JACK SALTES**
- **INFORMATION POSTED ON DNR WEB SITE:**
 - <http://dnr.wi.gov/topic/wastewater/CMOM.html>

BLENDING [NR 210.12]

- **DIVERSION AROUND BIOLOGICAL UNITS**
- **MUST APPLY FOR APPROVAL**
- **CANNOT BLEND UNLESS SPECIFIC CONDITION IN PERMIT**
- **WDNR MAY APPROVE IF:**
 - **NECESSARY DURING WET WEATHER TO AVOID SEVERE PROPERTY DAMAGE (facility may become inoperable due to solids loss)**
 - **CMOM PROGRAM IS BEING IMPLEMENTED EFFECTIVELY**
 - **NO FEASIBLE ALTERNATIVES**
 - **DESIGN OF FACILITY IS APPROPRIATE**

BLENDING (cont)

- **CONDITIONS FOR BLENDING**
 - **TEMPORARY, ONLY WHEN PEAK CAPACITY IS EXCEEDED; TO AVOID SEVERE PROPERTY DAMAGE**
 - **DIVERTED FLOW MUST BE RECOMBINED WITH FULLY TREATED SEWAGE PRIOR TO MONITORING & DISCHARGE**
 - **EFFLUENT LIMITATIONS THAT OTHERWISE APPLY MUST BE MET**
- **REPORT WITHIN 24-HR (phone, fax, email) & ON DMRs**

OTHER PERMIT REQ'MTS

- **REPORT CONTROLLED DIVERSIONS [NR 205.07(1)(v)]**
- **SCHEDULED BYPASSING APPROVALS ARE REQ'D [NR 205.07(1)(u)]**
- **OTHER OPTIONAL PERMIT CONDITIONS**
 - **CMOM ACTIVITIES [NR 210.23(7)]**
 - **SYSTEM EVALUATION AND CAPACITY ASSURANCE PLANS [NR 210.24]**
 - **RECURRING BUILDING BACKUPS CAUSED BY SYSTEM FAILURES [NR 210.22]**
- **ANY OTHER BYPASSING PROHIBITED [NR 205.07(1)(u)]**

SUMMARY

- **GREATER CERTAINTY & CONSISTENCY**
- **FLEXIBILITY**
- **SIGNIFICANT RESPONSIBILITIES FOR PERMITTEES**
 - **REPORTING**
 - **CMOM (COMPLETE BY AUGUST 1, 2016)**
 - **IMPLEMENTING PROGRAMS TO ELIMINATE/REDUCE I/I**
- **TRAINING – SUMMER/FALL 2014**