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Capacity, Management, Operations and Maintenance (CMOM) Plan
Overview
In accordance with National Pollutant Discharge Elimination System (NPDES) Permit No. NM0022250 (Permit), the Albuquerque Bernalillo County Water Utility Authority (Water Authority) prepared a Capacity, Management, Operations and Maintenance (CMOM) Plan with Emphasis on the Fats, Oils and Grease (FOG) Policy. The effective date of the Water Authority’s permit is October 1, 2012.

The CMOM Plan consists of the following documents:

1. FOG Policy
2. CMOM Annual Report
3. CMOM Program Self-Assessment

The FY2017 CMOM Annual Report follows previous FY2013-16 reports. The four previous reports, as well as the most recent, can be accessed at http://www.abcwua.org/Sewer_System.aspx.

Report Purpose
As indicated by its name, the CMOM Annual Report will be reissued to describe CMOM activities in the previous fiscal year (July 1 to June 30). This CMOM Annual Report covers July 1, 2016 to June 30, 2017. The CMOM Annual Report provides summary descriptions of CMOM activities (past and planned) and is intended to be a communication tool. The report is intended for Water Authority staff, regulatory authorities, customers, and the general public.

In order to match calendar year reporting typically utilized in communications with the US EPA, the Water Authority will provide future reports for the January 1 through December 31 timeframe. The next report will for CY2017.

Permit Requirements
The Water Authority discharges to the Rio Grande under authority of NPDES Permit No. NM0022250 (Permit). Under this Permit, the Water Authority operates the Southside Water Reclamation Plant (SWRP) and the Collection System. The following are the Permit requirements that impact the collection system.

2. The Water Authority must develop a Capacity, Management, Operation and Maintenance (CMOM) Plan with emphasis on the Fats, Oils and Grease (FOG) Policy. The FOG Policy will be a re-evaluation of the existing Sewer Use and Wastewater Control (SCO) Ordinance. The goal of the FOG Policy will be to reduce Sanitary Sewer Overflows (SSOs). The FOG Policy may address such items as an inventory of repeat Food Service Establishments (FSE) that cause SSOs and routine grease trap inspection programs at FSE with increased frequencies for repeat FOG SSO FSEs. Additional elements of the FOG Policy may be sewer line inspections, such as video recording and required sewer line cleaning activities if warranted at repeat sites.
CMOM Program Self-Assessment

EPA states (see http://www.epa.gov/npdes/pubs/cmomselfreview.pdf): “An important component of a successful CMOM program is to periodically collect information on current systems and activities and develop a “snapshot-in-time” analysis. From this analysis, the utility establishes its performance goals and plans its CMOM program activities.” The Water Authority developed Self-Audits as a part of the FY2013 and FY2014 reports. Because the data provided in the Self-Audit does not significantly change year-to-year, the next update will coincide with the CY2018 CMOM Report.

FOG Policy

The Water Authority’s FOG Policy is a separate document. The FOG Policy was developed as a requirement of the NPDES Permit effective on October 1, 2012 and subsequently approved by the United States Environmental Protection Agency (EPA). The policy was developed to work in conjunction with the Water Authority Sewer Use and Wastewater Control Ordinance (SUO) and Enforcement Response Plan (ERP) to reduce the rate of SSOs in the collection system and decrease FOG loading at the SWRP. The policy describes expectations for FOG dischargers such as Food Service Establishments (FSEs) and waste haulers, and the steps the Water Authority is taking to mitigate FOG.

The FOG Policy sets a Water Authority goal of inspecting every FSE at least once every three years. Details of what is expected of the FSE in terms of Grease Removal System (GRS) functionality, pumping schedule, maintenance, and recordkeeping are identified. The FOG policy explains the Water Authority use of the 25% solids and grease rule (25 Percent Rule) to determine if a GRS is filled to capacity. The policy also contains Best Management Practices (BMPs) such as scraping plates, using screens, and not using emulsifiers, etc.

Pumper requirements are also covered in the FOG Policy. Full evacuation of a GRS is required each time pumping occurs. The pumper must leave the FSE documentation in the form of manifests that contain pertinent information such as date, time, volume pumped, and the condition of the GRS. The FOG Policy lists the minimum service to be provided by the pumper.

Enforcement of FOG violations and hauled wastewater violations is described in the FOG Policy. The FOG Policy works in conjunction with the ERP to set administrative assessments for violations.

The FOG Policy also sets forth the process for identifying new sources of FOG. The Water Authority Pretreatment Program will update the FOG database on an annual basis. The FOG Policy sets a goal that the Water Authority will meet with the City of Albuquerque, Bernalillo County, the Village of Los Ranchos, the Village of Corrales, plumbers, and the New Mexico Restaurant Association on a semiannual basis to discuss FOG issues.

In developing the FOG Policy, the Water Authority held a meeting with the hauled wastewater permit holders on July 22, 2013 and a public meeting on July 25, 2013 to discuss the proposed Policy. The final FOG Policy was submitted to the EPA on September 27, 2013 and updated in the Pretreatment Program modification documents sent to EPA on June 2, 2014. No comments from EPA were received regarding either submission, thus indicating approval.
FOG Enforcement
In FY2017, the Water Authority Pretreatment Program had 1,812 compliant FSEs out 2,036 FSE sites for a compliance rate of 89%. 1,350 FSE inspections were conducted with 1,110 passing and 240 failing. Of the 240 failed inspections, 75 FSEs corrected the deficiencies and called for a re-inspection within seven (7) days. The remaining 165 FSEs did not take corrective action and thus were issued Notices of Violation (NOVs) of which 1 was for no GRS, 36 were for non-functioning GRS, 65 were for GRS needs pumping, and 123 were for missing manifests.

In response to SSOs, 23 FSE inspections were conducted with 6 failing. Within the seven day grace period, 1 FSE corrected the deficiency. After the seven day grace period, 5 NOVs were issued. In addition, Water Authority Pretreatment personnel distributed FOG brochures to FSEs, single-family residences and apartment complexes upstream of the SSOs.

Additionally, the Water Authority’s Public Information Office advanced radio, print and television public outreach for the purpose of improving the Water Authority’s FOG Policy.

SSO Analyses
Permit Requirements
The Permit requires a CMOM Plan with an emphasis on FOG Policy. The Plan goal is to reduce impacts on the sewer system caused by FOG and the Policy goal is to reduce SSOs. The FOG Policy states that the Pretreatment Program will investigate all SSOs related to large amounts of grease. The policy is to take enforcement actions for violations of FOG requirements with priority on FSEs causing repeat SSOs.

SSO Study Team
To meet these requirements, the Water Authority created an SSO Study Team. The Team is comprised of:

1. Collection Section – Research Analyst (team lead), Gravity Superintendent, Assistant Superintendent and Closed Circuit Television (CCTV) Supervisor;
2. NPDES Pretreatment – Industrial Pretreatment Engineer and Pollution Prevention Specialist.

The Mission Statement for the Study Team is: The SSO Study Team will work inter-divisionally to study, analyze and determine causes of previous SSOs to mitigate future SSOs in the Collection System.
The Study Team procedure is:

1. Tabulate all 10-40s, 10-42s and 10-48s (see Table 1 for definitions).
2. Ensure all segments responsible for causing 10-42s and 10-48s are televised.
3. The Research Analyst will review and analyze all CCTV inspections to determine causes (if possible) and document findings.
4. To conduct meetings with the SSO Study Team to review and analyze CCTV that needs further investigation for resolution.
5. Recommend/implement and document mitigations (if possible) based on analysis.
6. Coordinate with NPDES Pretreatment concerning grease issues discovered during analysis.

### Table 1 Sewer Trouble Definitions

<table>
<thead>
<tr>
<th>Sewer Trouble Definitions</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>10-40 Sewer Backup</td>
<td>A gravity line blockage that does not result in a spill, or in the vacuum system, a low vacuum (low vac) that causes a customer service disruption. Does not result in an SSO Reportable (10-42) or a Property Damage (10-48).</td>
</tr>
<tr>
<td>10-42 SSO Reportable</td>
<td>An overflow of sewage from the system that may impact surface waters. These are reported to the EPA and other locally impacted stakeholders.</td>
</tr>
<tr>
<td>10-48 Property Damage</td>
<td>An overflow of sewage from the system that results in damage to private property. These are not reportable under current definitions.</td>
</tr>
</tbody>
</table>

Appendix 1 identifies all 10-42s and 10-48s, and the overflows that resulted in both a 10-42 and a 10-48. When documenting the number of Sewer Troubles of different types, for example in Figure 1 and Figure 2, the 10-42 item includes all overflows that may impact surface waters, including those that also had property damage; the 10-48 item includes overflows that only resulted in property damage. This prevents double-counting the number of overflow occurrences.

All 10-40s, 42s and -48s were CCTV inspected, although only 10-42s are “reportable”, i.e., required to be reported to the EPA, et al. All 10-42s and -48s were then examined by the Study Team and a Cause and Mitigation were determined.
Table 2 Types of Causes for SSOs

<table>
<thead>
<tr>
<th>Cause(s) of SSO from DMR</th>
<th>Causes determined from CCTV</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO - Construction</td>
<td>DB - Debris</td>
</tr>
<tr>
<td>CU - Cause Unknown</td>
<td>RK - Rocks</td>
</tr>
<tr>
<td>EQ - Equipment Failure</td>
<td>GR - Grease</td>
</tr>
<tr>
<td>SGG - Sand, grit or gravel</td>
<td>RT - Roots</td>
</tr>
<tr>
<td>LF - Line Failure</td>
<td>RN - Rainfall</td>
</tr>
<tr>
<td>V - Vandalism</td>
<td>RGS - Rags</td>
</tr>
<tr>
<td>RGR - Roots / Grease</td>
<td>BP - Burped</td>
</tr>
<tr>
<td></td>
<td>SC - Surcharged</td>
</tr>
<tr>
<td></td>
<td>SL - Sag in Line</td>
</tr>
<tr>
<td></td>
<td>IT - Intruding Tap</td>
</tr>
<tr>
<td></td>
<td>MH - Manhole</td>
</tr>
<tr>
<td></td>
<td>OJ - Offset Joint</td>
</tr>
</tbody>
</table>

Causes & Mitigations
The Cause(s) were selected from Table 2 that identifies SSO causes from the DMR and CCTV. The monthly SSO DMR has a specific list of Causes that are based on system observations made by an Operator or Supervisor at the site of an SSO. The CCTV data provided to the Study Team often results in a different, more refined Cause or Causes. Table 3 provides the causes determined by the Study team for FY2017. (Note: Percentages may not add up to 100%, as they are rounded to the nearest percent.)

Table 3 Summary of Causes from SSO Study

<table>
<thead>
<tr>
<th>FY2017 10-42, 10-48 Causes</th>
<th>Total</th>
<th>% of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Burp</td>
<td>3</td>
<td>6%</td>
</tr>
<tr>
<td>Construction</td>
<td>4</td>
<td>8%</td>
</tr>
<tr>
<td>Cause Unknown</td>
<td>8</td>
<td>16%</td>
</tr>
<tr>
<td>Debris</td>
<td>8</td>
<td>16%</td>
</tr>
<tr>
<td>Equipment Failure</td>
<td>3</td>
<td>6%</td>
</tr>
<tr>
<td>Grease</td>
<td>7</td>
<td>14%</td>
</tr>
<tr>
<td>Line Failure</td>
<td>6</td>
<td>12%</td>
</tr>
<tr>
<td>Manhole</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td>Manhole/Roots</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td>Roots</td>
<td>5</td>
<td>10%</td>
</tr>
<tr>
<td>Sand, Grit or Gravel</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td>Sag in Line</td>
<td>3</td>
<td>6%</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>50</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>
Mitigations are the steps that the Team identified to prevent a recurrence of an SSO, at least for the identified Cause. Specific Mitigations are very dependent on the conditions observed from the CCTV video and report. Table 4 provides a summary of the various Mitigations. The Mitigations are tracked through completion or implementation. (Note: Percentages may not add up to 100%, as they are rounded to the nearest percent.)

Table 4 Summary Mitigations from SSO Study

<table>
<thead>
<tr>
<th>FY2017 10-42, 10-48 Mitigations</th>
<th>Total</th>
<th>% of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Follow Up Needed</td>
<td>15</td>
<td>30%</td>
</tr>
<tr>
<td>Pretreatment Notified</td>
<td>5</td>
<td>10%</td>
</tr>
<tr>
<td>Rehab/Replace</td>
<td>15</td>
<td>30%</td>
</tr>
<tr>
<td>Short Interval</td>
<td>7</td>
<td>14%</td>
</tr>
<tr>
<td>Short Interval/Special Instructions</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td>Special Instructions</td>
<td>4</td>
<td>8%</td>
</tr>
<tr>
<td>Special Instructions/Short Interval</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td>Short Interval/Special Instructions/Pretreatment Notified</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td>Pretreatment Notified/Short Interval</td>
<td>1</td>
<td>2%</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>50</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

SSO Tabulation & Analysis
Appendix 1 contains a list of every 10-42 and 10-48 event in FY2017. The table columns are grouped as follows:

1. The type, i.e., 10-42 or -48, is identified on the left. In two cases a single event was both a 10-42 and a 10-48, as indicated.
2. Next to the right are the data included in the monthly SSO DMRs. It is noted that a “Reported Cause” is listed. This is typically based on the observations of the Operator that reported the SSO.
3. Next to the right is data determined by the Study Team:
   a. Cause
   b. Mitigation
   c. If Pretreatment follow-up is necessary
4. To the far right are follow-ups by NPDES Pretreatment
   a. FSEs visited
   b. Notice of Violation issued

Figure 1 shows the cumulative 10-42s by month for FY2012-17.
Figure 1 Reportable SSOs

The SSO Rate is defined as 100 times the number of SSOs in a year divided by the miles of sewer in the system. The Water Authority system has a total of approximately 2,414 miles of line (p. 8 of the Self-Audit). The SSO rate is therefore 4.5, 2.8, 2.5, 2.3, 1.7, and 1.4 for FY2012-17 respectively.
Figure 2 shows the total sewer troubles, i.e. 10-40s, -42s, and -48s by year for FY2012-17. This graph does not include 10-48s due to “burps” which are not due to a blockage or other failure resulting in the overflow of sewage. Instead, air displaced during the Vactor jetting cleaning can under certain circumstances force out the water in the home fixture P-traps, e.g. toilets and sinks. These sometimes result in claims and are therefore included in the Property Damage totals for completeness and consistency. The burps for FY2012-17 have been 1, 0, 5, 5, 9, and 3 respectively. The burps are identified in Appendix 1.

![Sewer Trouble in the Collection System Comparison FY12-17](image)

**Figure 2 Sewer Trouble Comparison**

**Volume Spilled and Recovered**

Via the OERP, the Water Authority has implemented a policy of capturing spills and documenting actions. Appendix 2 provides estimated spill volumes and volumes recovered for the 34 reported SSOs for FY2017. Of the spill volume estimated not to be recovered, none was identified as directly reaching the Rio Grande. Two spills (12/6/2016 and 2/10/2017) did reach the Los Padillas Drain which is operated by the MRGCD. The Los Padillas Drain eventually discharges to the Rio Grande. The response to these spills, which includes inter-agency coordination and procedural changes, is further discussed below as a part of “Actions Implemented and On-Going Programs”. As discussed below, spill recovery for the 12/6/2016 and 2/10/2017 SSOs involved containment and pumped removal of the spill mixed with base flow in the drain. As a result, per Appendix more volume was removed than spilled although not all was spilled sewage.
Actions Implemented and On-Going Programs

General
Below are gaps that were identified in the FY2016 CMOM Report and were closed in FY2017, or are on-going programs, or both. In addition to the commitments made in the FY2016 CMOM Report, the following additional actions were taken to expand the Water Authority’s ability to operate and maintain the system.

1. Purchase orders have been issued for two new Vactors which will be obtained and put into service in FY2018.

FOG Policy Implementation:
FOG Policy is an on-going program. Long-term recommendations were made in the FY2014 CMOM Report. The following are on-going efforts to meet the long-term FY2014 recommendations:

1. Develop a link between the Linko FOG database utilized by NPDES Pretreatment and the Maximo work order system used by the Collection Section.
2. Continue working on creating a FSE flier in Spanish. The Pretreatment Section, in conjunction with the Public Information Office, will continue to develop FSE fliers in languages other than English.
3. Satellite Community agreements require that FSE connections be coordinated with the Water Authority.
4. The Pretreatment Program continued issuing NOVs for not complying with the record keeping requirements of the SUO and FOG policy.
5. The Pretreatment Program continued issuing NOVs for not complying with the direct access provisions of the SUO and FOG policy.
6. The pretreatment Program continued issuing NOVs for non-functioning Grease Removal Systems.
7. The pretreatment Program continued issuing NOVs for failure to maintain proper maintenance frequency.
8. The pretreatment Program has been inspecting FSEs at a higher frequency than required by Fog Policy.
Overflow Emergency Response Plan (OERP)
This is an on-going program to update the OERP as required. In FY2017, the following modifications were made to the OERP:

1. Page 1: Added note to call Dispatch when a sewer problem is encountered. This will help everyone to know who to call to get quickest service.
2. Page 4:
   a. Added additional contact information for COA and AMAFCA.
3. Page 7: Added information on who to call regarding spills that occur at:
   a. KAFB.
   b. UNM.
4. Page 11:
   a. Updated contact information for MRGCD.
   b. In the event that a spill reaches the Rio Grande or an MRGCD facility, added calls to the POI.
   c. Requires E. coli testing in the event of an SSO that reaches an MRGCD facility.

The Collection Section is the “owner” of the OERP. The Collection Section creates the components of the OERP, routes for internal review (specifically including the Compliance Division), and the completed portions are approved for posting to SharePoint by the Collection Section Manager. Appendix 3 provides the OERP which was in effect at the end of FY2017.

In accordance with the OERP, the Water Authority coordinated with the MRGCD on two spills that occurred on 12/6/2016 and 2/10/2017. Both spills impacted the Los Padillas Drain which is operated by the MRGCD. In each case, staff from the Water Authority and MRGCD met on-site and discussed means of spill containment and removal. In the event of the 12/6/2016 spill, a beaver dam had blocked flow at the first culvert downstream. The MRGCD removes these beaver dams as a typical maintenance but did not do so until the Water Authority completed its cleanup. In the event of the 2/10/2017 spill, two temporary berms were installed by the MRGCD downstream to contain any remaining spill. In each case, contained spill mixed with base flow in the drain was pumped and removed by the Water Authority. In each case, the containment location and means, i.e. beaver dam and berms, were determined by the MRGCD based on visual monitoring of the drain flow characteristics in conjunction with the spill.

As a result of these spills, issues were identified with the OERP and addressed as noted above. It is noted that both spills were caused by the Vacuum Station 63 force main. As a part of a larger project, this force main has been replaced and realigned and therefore we don’t anticipate that there will be additional SSOs from this line.

On 3/29/2017, the COA and Water Authority performed a simulated SSO that impacted a COA storm drain. The process on page 4 of the Overflow Emergency Response Plan (OERP) was followed. This process worked well and did not need revision. Additional contact names were provided and added, as noted above.
Force Main Inspection Program
This is an on-going program in which the alignment is annually inspected for all force mains and valves found in field are compared to those in the GIS mapping and this information is stored in Maximo.

In FY17, two additional items were addressed relative to force main operation and maintenance.

1. In previous inspections, some valves were not found in the field. These not-found valves were noted in Maximo. Based on these previous inspection, in FY17 five critical valves were identified, turned over to the construction group which then found these valves and brought them to grade.
2. In FY17, a pumping test was performed on the parallel 18” and 24” force mains serving LS24. One at a time, each of the two lines were closed, all flow pumped through the other line, and flow conditions observed. This verified the force mains could be operated separately.

Closed Circuit Television (CCTV)
This is an on-going program. The following recommendation is made in the FY2013 CMOM Report: “CCTV inspections of the collection system as follows: 1) Small diameter main lines less than 15”: In four of five years, televise approximately 5% per year of the small diameter system. Telewise high risk lines based on current Asset Management Plan and subsequent in-house analysis. 2) Large diameter lines 15” and larger: Every fifth year, televise as much as possible acknowledging access limitations of the unlined concrete lines 15” and larger.
Anticipated schedule: 3) FY2014-17: 5% of the small diameter each year. 2) FY18: Large diameter unlined concrete pipe.”

The CCTV program will continue. Anticipated schedule:

1. FY18: Large diameter unlined concrete pipe.
2. FY19: 5% of the small diameter. (Any small diameter inspections accomplished in FY18 will be allocated to meeting the FY17 or FY19 goals.)
3. FY20: 5% of the small diameter.
4. FY21: 5% of the small diameter.

The FY2017 portion of this recommendation is complete. It is currently estimated that that the system includes 1996 miles of small diameter gravity pipe. Figure 3 provides the CCTV goal for a ten-year basis and the actual CCTV inspection for the first four years.
Cleaning Program Goal
This is an on-going program. The following recommendation is made in the FY2013 CMOM Report: “The Water Authority will establish and monitor a goal of cleaning all gravity small diameter lines every ten years. (This will be accomplished through the existing Sub-Basin program.) The Water Authority will continue the program of high-frequency maintenance of known problem locations within the system. (This will be accomplished through the existing Short Interval program.) The frequency of Short Interval cleaning will vary in accordance with system performance and risk factors, maintenance history, and the latest maintenance findings.”

The FY2017 portion of this recommendation is complete. In FY2017, the Water Authority cleaned approximately 286.9 miles under the Sub-Basin program. This is equal to approximately 14.4% of the small diameter system which exceeds the 10% pace implicit in cleaning every ten years. Likewise, the Short Interval cleaning program was maintained with approximately an additional 266.6 miles cleaned.

As shown Figure 4 below, the Water Authority is ahead of its goal to clean then entire system once in ten years through the Sub-Basin program.
The cleaning program continues with the same goals but the focus will shift to lines identified as previously experiencing sewer trouble. An in-house study performed in FY2017 identified that lines previously impacted by a 10-40, 10-42, or 10-48 are much more likely to experience a future 10-42 or 10-48 than the system as a whole. In FY2017 and FY2018, the lines with previous trouble not caused by burps, contractor negligence, etc. were added to the Short Interval program. Because the Short Interval program focuses on the lines more likely to cause future spills, the Water Authority in FY2018 will increase the cleaning of Short Interval lines. The Sub-Basin program and associated ten-year goal remain in place.

![Figure 4 Small Diameter Sewer Cleaned vs. Ten-Year Goal](image-url)
**Root Foaming**
The following recommendation is made in the FY2013 CMOM Report: “Starting in FY15, implement a 3-year pilot program. Root foam selected lines that meet the root infested and / or inaccessibility criteria. Compare effectiveness to mechanical cleaning currently practiced and provide recommendation.”

The Root Foaming Pilot Project is a three year program. The FY15 and FY16 groups were foamed in June 2015 and March 2016 respectively. Per vendor recommendations, the FY15 group was retreated in June 2017. This completes the foaming application of the Pilot Project. An interim inspection of the FY15 treated and control group was performed in FY2016 and was inconclusive. During FY2017, the FY15 and FY16 lines, both treated and control, were scheduled for CCTV inspection. During FY2018, this CCTV data will be examined to compare treated and control pipes.

**Generator Plan**
The following recommendation is made in the FY2016 CMOM Report: “In FY2017, it is recommended to run a test at two vacuum stations in which power is actually cut and the portable generators are hooked up.” This recommendation follows the development of an SOP for portable generators (recommended in the FY2014 CMOM and reported in the FY2015 CMOM) and a simulation of the simultaneous failure of power at Vacuum Stations 67 and 69 (FY2016 CMOM).

On 4/12/2017, the power was shut down at Vacuum Stations 57 and 68 and portable generators were utilized simultaneously run both stations. This completes the FY2017 recommendation.

In FY2018, it is recommended that a simultaneous power failure be tested at three vacuum stations. Again, power will be shut down and portable generators will be hooked up and attempt to run the three stations simultaneously.

**Odor Complaints**
The Water Authority has committed to tabulate odor complaints by month. The EPA considers odor and corrosion control an issue in collection system O&M, as indicated by the Hydrogen Sulfide Monitoring and Control (HSMC) section in the CMOM Program Self-Assessment standard template from the EPA website.

Odor control is a major issue in warm-weather systems such as Albuquerque’s. A high correlation has been demonstrated between odor complaints and the sewage temperature (analysis of FY11 & FY12 temperature vs. odor complaint data, $r = 0.89$, $p < 0.02$). Odor complaints are also known as a 10-52. The following graphic shows the odor complaints received by the Water Authority in FY2012 through FY2017. All odor complaints received are included in this graphic; however, study has indicated that approximately ¾ of the complaints received originate in the private and not the public system.
### 10-52 Odor Complaints

<table>
<thead>
<tr>
<th>Cumulative 10-52 Odor Complaints</th>
<th>Jul</th>
<th>Aug</th>
<th>Sep</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
<th>Jan</th>
<th>Feb</th>
<th>Mar</th>
<th>Apr</th>
<th>May</th>
<th>Jun</th>
</tr>
</thead>
<tbody>
<tr>
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**Figure 5 Odor Complaints**
The following flow chart describes the process followed by the Water Authority in response to an odor complaint. This specific process in the immediate response and the follow-up to odor complaints is due to the importance placed on customer service. Also, the Water Authority has found that some odor complaints are due to a blockage prior to an overflow; therefore, a quick response can prevent an SSO.

10-52 Odor Complaint Flow Chart

**Definitions**
- **Positive Test**: Customer is getting smoke in their house
- **Negative Test**: No smoke in their house

![Odor Complaint Flow Chart](image_url)

Figure 6 Odor Complaint Flow Chart
Identified Gaps in the Water Authority Processes with Recommendation to Close

In the process of continuous improvement, the Water Authority is committed to identifying and closing gaps. As discussed above, most of these recommendations are now considered On-Going programs.

Prohibited Discharges, i.e., SSOs

The Water Authority acknowledges that prohibited discharges have occurred and that all discharges from the sanitary sewer system are prohibited.

Recommendation: The Water Authority will annually examine sewer system performance, set specific steps for decreasing SSOs and mitigating their impacts, and has a program of continuous improvement.

Formalize SSO Follow-Up Involving Administrative Assessments or Equivalent

Some SSOs are directly caused by construction contractors or commercial/industrial users. In many such cases, the Water Authority has taken steps to hold the offending party responsible and required financial compensation. Cost assessments have been based on direct costs of a particular blockage, both to immediately respond and for follow-up cleaning and inspection. Costs have been developed by the Collection Section, or in the case of contractor repairs, by Centralized Engineering. Dependent of the particulars of the blockage and the offending party, costs may be assessed and collected by different groups, e.g. Compliance Division or Risk Management.

The intent is to alert the offending party that their company caused identifiable problems in the sewer system and to do so in a way that causes them to control their operations and staff. In past instances in which an offending party was explained how their actions resulted in problems in the sewer system, they have typically been apologetic and have taken steps to prevent a recurrence.

In FY2018, it is recommended that the Compliance Division develop a Sewer Trouble Invoice Statement to be utilized, where appropriate, to assess costs for sewer blockages, including those for which an SSO did not occur.
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**Note:** The table above represents a portion of the FY2017 Overflow Analysis Table. The entire table contains more rows and columns with detailed information about each overflow event. The columns include, but are not limited to, the Maximo WO number, diameter, reported date, time of SSO, duration, location, estimated volume, reported cause of overflow, action taken, and ultimate discharge location. The data indicates repeat overflow analysis, location, and other relevant details. The table format is suitable for clear and structured data representation.
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**Grand Total:**

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<th>Volume Not Recovered (gallons)</th>
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Appendix 3  Overflow Emergency Response Plan (OERP)
Overflow Emergency Response Plan
Albuquerque Bernalillo County Water Utility Authority

Note: All Emergency responses are initiated by a call to Dispatch at 842-WATR (842-9287). Please call there first. If you do not, the emergency responders have to call and delay the response.

Customer calls dispatch with issue

Dispatch collects data and creates a Service Request; Task elevated to supervisor

Collection Response

Supervisor creates a work order and sends crew to location. Status of work order is updated to DISPATCHED

Unblock and Clean up. Pg. 2

Follow up study and mitigation. Pg. 6

Notification process. Pg. 7

Alert Media. Pg. 10

Spill to pervious areas. Pg. 3

Spill entered / entering storm drain collection system. Pg. 4

Private vs. public SSD. Pg. 5

Spill has entered storm pump station. Pg. 9

Spill entering Waterway. Pg. 11

Tech confirms asset and fills out required information in the work order

Supervisor reviews work order for quality assurance. Status of work order is updated to COMPLETE AND READYFOR REVIEW

Planner / Scheduler does quality control and updates status of work order to COMPLETE

Applies only to Collection System sewer problems.
Unbblock and Clean Up.  Pg. 1

Crew arrives on site

Is SSO clearly public?

Yes

Note the time of dispatch and arrival on scene

Protect public from area.

Note the start and stop time that the overflow occurred

Apply HTH per SOP

Clean Sewer.  Pg. 5

Investigate the cause and stop the sanitary sewer overflow.

If evidence of "Extreme" FOG.

Is additional help necessary to aid the clean up / remediation efforts?

Yes

The Vactor truck(s) should be dispatched immediately.

No

Determine whether overflow has entered pervious area, storm drain, ditch, canal, or storm pump station.

Spill has entered a waterway.  Pg. 11

Spill to pervious area.  Pg. 3

Spill entered / entering storm drain collection system.  Pg. 4

Spill has entered a COA storm pump station.  Pg. 9

Private vs. Public SSOs.  Pg. 5

Note the time of dispatch and arrival on scene
Overflow Emergency Response Plan

Albuquerque Bernalillo County Water Utility Authority

Immediately begin collecting spill with Vactor truck.

When SSO stopped, apply washwater & HTH to spill area & allow to flow to pervious area and remove washwater.

Supervisor or Superintendent to determine / recommend remediation. Consult with Chief Engineer if required.

Implement

Yes

Supervisor or Superintendent to determine if public access to pervious area is a concern.

No

Allow to dry.

Yes

Remediation Complete. Pg 1

No

Allow to dry.
Overflow Emergency Response Plan
Albuquerque Bernalillo County Water Utility Authority

Spill entered / entering storm drain collection system. Pg. 2

If possible, position 2nd Vactor to remove spill prior to reaching inlet.

Determine how far downstream the spill has reached.

Add wash water & remove at downstream manhole. Remove immediately if rain is imminent. If not, remove next normal work day.

Wash water to street and inlet.

SSO Reaches COA storm drain.

SSO Reaches

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<td>AMAFCA Facility</td>
<td>Jerry Lovato *</td>
<td>Executive Engineer</td>
<td>884-2215</td>
<td>362-0020</td>
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<tr>
<td>Bernalillo County Facility</td>
<td>Hugh O’Neill</td>
<td>Storm Drainage Maintenance Manager</td>
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<td>NMDOT Facility</td>
<td>Thomas Kratchvil</td>
<td>District 3: Assistant District Engineer-Maintenance</td>
<td>796-6637</td>
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<td>COA Facility</td>
<td>Kevin Daggett **</td>
<td>Storm Water Section Manager</td>
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</table>

Wash water to street and inlet.

Remediation Complete. Pg. 1

Note: Process shown is for typical spills. Spills that are not appropriate for Vactor removal may require a joint response with the impacted MS4 Permittee in which the spill is captured, treated, and determined appropriate for release.

*If Jerry Lovato is not immediately available, call:
Nolan Bennett: Field Engineer (505) 301-6941
Herman Gabaldon: Superintendent (505) 366-8209

**If Kevin Daggett is not immediately available, call:
Carl Rinkenberger: O&M Manager (505) 250-4334
Daniel Tapia: O&M Supt (505) 228-6874
Overflow Emergency Response Plan
Albuquerque Bernalillo County Water Utility Authority

Private vs. Public SSOs. Pg. 2

Ask Supervisor.

Clearly Public?

Yes

Elevate to Superintendent.

No

Clearly Private?

Yes

Inform Public

No

Resolve if Public?

Yes

Clean Sewer. Pg. 2

No

Do not clean sewer

Depending on jurisdiction, follow up with City of Albuquerque, Bernalillo County, Village of Las Ranchos or NMED (See table for contacts)

Remediation Complete. Pg. 1

Note: The identified code enforcement contacts will also be utilized to report private service lines issues resulting in sewage spills to private or public property.

Public and private lines may be differentiated on the Water Authority GIS Mapping.

Private lines that may be confused with Water Authority mains should be identified to the Collection Section Research Analyst for inclusion in the “Waste Water Non-Authority” layer.

City of Albuquerque Code Enforcement
(505) 924-3450

Bernalillo County Natural Resource Services Review & Permitting Section
(505) 314-0375

Village of Las Ranchos
(505) 344-6582
Code Enforcement office

NMED Liquid Waste Program (505) 222-9500
(505) 827-1840

For non-Authority spills in the City limits, in addition to calling the appropriate portion of GDA Code Enforcement, also alert: Kevin Daggett- (505) 803-8058

For non-Authority spills in the County, in addition to calling Natural Resources Services, contact Hugh O’Neall at 934-2704. For any non-Authority that impact an AMAFCA or NMDOT facility, alert the appropriate contact listed on page 4.
Follow up study and mitigation, Pg. 1

Research Analyst/GIS Intern creates a follow-up cleaning and CCTV work orders for gravity 10-40s, -42s, and 48s.

Sewer lines televised.

Research Analyst compiles maps and data associated with all unstudied 10-42s and -48s for SSO Study Team Meeting.

Is a defect identified as Grade 7 or 8?

Yes

Will it be assigned in-house or to on-call contractor?

On-Call

Forward to Centralized Engineering and copy Collection Section Manager, Gravity Superintendent, and Research Analyst.

In-House

Create Maximo Work Order.

Research Analyst compiles SSO cause and mitigation.

Consensus cause. Consensus mitigation.

SSO Team examine/request more data/resolve.

Research Analyst studies SSOs. Obvious cause?

Yes

Research Analyst compiles SSO cause and mitigation

Consent List

SSO Team accepts/requests further study

Accepted Cause. Accepted Mitigation.

Consent List

SSO Team accepts/requests further study

Accepted Cause. Accepted Mitigation.

Review with Collection Section Manager for suggestions and approval.

Mitigation

FOG

End of Pretreatment involvement, Pg. 8

Submit to Pretreatment for enforcement, Pg. 8

Non-FOG

SSO Tracking Table

Collection Section Manager approves and routes for implementation.*
Overflow Emergency Response Plan
Albuquerque Bernalillo County Water Utility Authority

**Notification Process**

- Spill from WUA System?
  - Yes
    - Spill contained in WUA Facility (e.g., dry well)?
      - Yes
        - O & M Supervisor Reports
          - Within 12 hrs. or 24 hrs. of time of dispatch notified or contractor verbally reports
            - Oral report
              - Pueblo of Isleta (12 hrs.)
              - NM Environment Dept. (24 hrs.)
            - Email report
              - EPA (24 hrs.)
        - No
          - Contractor verbally reports to collection section
            - Superintendent or standby Supervisor.
            - Collection Section Manager to COA & AMAFCA
      - No
        - Spill contained in private facility (e.g., basement SSO)?
          - Yes
            - O & M Supervisor Reports
              - Within 12 hrs. or 24 hrs. of time of dispatch notified or contractor verbally reports
                - Oral report
                  - Pueblo of Isleta (12 hrs.)
                  - NM Environment Dept. (24 hrs.)
                - Email report
                  - EPA (24 hrs.)
          - No
            - Contractor provides 24 hour written report.
            - Assistant Superintendent prepares written report. Field Division Manager signs.
            - Collection Section Manager to COA & AMAFCA
    - No
      - Spill contained in dry well?
        - Yes
          - O & M Supervisor Reports
            - Within 12 hrs. or 24 hrs. of time of dispatch notified or contractor verbally reports
              - Oral report
                - Pueblo of Isleta (12 hrs.)
                - NM Environment Dept. (24 hrs.)
              - Email report
                - EPA (24 hrs.)
          - No
            - Contractor verbally reports to collection section
              - Superintendent or standby Supervisor.
              - Collection Section Manager to COA & AMAFCA
        - No
          - Document but do not report.

**GWQB Reporting**

- Ponded sewage on a pervious area may require additional reporting to the Ground Water Quality Bureau (GWQB). Circumstances presumed to require this reporting will be:
  - A sewage spill that:
    - Is ponded for more than 24 hours and,
    - At a depth of more than 12 inches over an area of more than 0.1 acre.
  - The normal 24-hour call to NMED Surface Water is presumed to meet the requirement for a 24-hour notification to the GWQB. The Collection Section Manager shall be notified and shall be responsible for preparing the following additional reporting:
    - One week written report. Presumed the same as the five day report provided to NMED Surface Water.
    - 15-day Corrective Action Report.

**For system breaks resulting in release on KAFB:** Call Kirtland AFB Command Post at (505) 846-3777 within 12 hours.

**For spills on the UNM Main and North Campus contact:**
- The Work Control Center (M-F 7:00 a.m. to 4:30 p.m.) at (505) 277-1600 and all other times contact the Campus Police at (505) 277-2241.

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Overflow Emergency Response Plan
Albuquerque Bernalillo County Water Utility Authority

Supervisor calls Pretreatment Office Assistant (289-3419)

- Address
- Date
- Time
- Supervisor Name
- Estimated Volume

Is P2 spec. available?

- Yes: P2 spec. investigates
- No: Pretreatment Engineer investigates

Pretreatment Involvement. Pg. 2

Submit to Pretreatment for enforcement. Pg. 6

Observe site, fill out form, take pictures, and collect sample if possible

Use mapping resources to establish upstream basin area

Develop list of FSEs in area

Is a FSE responsible?

- Yes: Start Enforcement Process
- No: Update SSO Tracking Table, Pg. 6

Note any problem FSEs.

Visit FSEs and check GRSs and manifests

LINKO Generated Notice of Violation (NOV)

Start Enforcement Process

Is a FSE responsible?
Spill has entered a COA storm pump station.

Shut down pumps

Remove sewage with Vactor or pump to SAS

Wash down wet well and remove wash water

Note: Process shown is for typical spills. Some spills may require a joint response with the City of Albuquerque in which the spill is captured, treated, and determined appropriate for release.

Remediation Complete.

Pg. 1
Overflow Emergency Response Plan
Albuquerque Bernalillo County Water Utility Authority

For large or significant spills, contact the Superintendent, Chief Engineer, or Division Manager to contact Public Affairs Manager (PAM), Dave Morris, or Chief Operating Officer (COO), John Stomp. Provide required information.

Media alerted by PAM, COO, or designee.
Overflow Emergency Response Plan
Albuquerque Bernalillo County Water Utility Authority

Spill has entered a waterway.
Page 2

If possible, stop the flow from entering the waterway and collect wastewater.

Reaches MRGCD Facility?
Yes

Reaches Rio Grande?
No

Remove debris.

Yes

Sample MRGCD facility for E-coli upstream and downstream of SSO.

Contact (In sequence until contacted)
- Jason Casuga  Engineer I  (505) 259-1005 Cell
- Joe Brem  Albuquerque Division Manager  (505) 249-5780 Cell
- Ray Gomez  Engineering Supervisor  (505) 280-1093 Cell
- Joe Baca  Equipment Operations & Maintenance Supervisor  (505) 249-5155 Cell

Yes

Assist in cleanup as requested.

Pueblo of Isleta

1. First, call Emergency Dispatch and Wildland Law Enforcement
   Emergency Dispatch (505) 869-3030 (Voice message OK)

2. Next call
   Wildland Law Enforcement
   Lieutenant Arnold Chavez
   Cellular: (505) 269-6811
   or
   Office: (505) 869-7561

3. Finally, call in sequence the following numbers until a live person is reached:

<table>
<thead>
<tr>
<th>Title</th>
<th>Name</th>
<th>Office</th>
<th>Cellular</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment Division Manager</td>
<td>Ramona Montoya</td>
<td>(505) 869-7560</td>
<td>(505) 263-5425</td>
</tr>
<tr>
<td>Environmental Technician</td>
<td>Ruben Lucero</td>
<td>(505) 869-3019</td>
<td>(505) 917-9346</td>
</tr>
<tr>
<td>Water Quality Specialist</td>
<td>Cody Walker</td>
<td>(505) 869-9033</td>
<td>(505) 229-4555</td>
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</tbody>
</table>