

What Is CMOM?

CMOM stands for “Capacity, Management, Operations, and Maintenance”. It is a flexible, dynamic framework for municipalities to identify and incorporate widely accepted wastewater industry practices to:

- Better manage, operate, and maintain collection systems
- Investigate capacity constrained areas of the collection system
- Respond to sanitary sewer overflow (SSO) events

In CMOM planning, the utility selects performance goal targets, and designs CMOM activities to meet the goals. Information collection and management practices are used to track how well each CMOM activity is meeting the performance goals, and whether overall system efficiency is improving.

The CMOM Program and what it entails

The proposed CMOM approach outlines a dynamic system management framework that encourages evaluating and prioritizing efforts to identify and correct performance-limiting situations in the collection system. Industry technical guidance supports the need for dynamic approaches that use information about system performance, changing conditions, and operation and maintenance practices to guide and modify responses, routine activities, procedures, and capital investments.

The CMOM program was developed in an attempt to establish a process and framework that would allow collection system owners and operators to:

1. Understand the components that make up the collection system and how the collection system performs.
2. Identify goals and objectives for managing a specific collection system.
3. Provide the necessary program structure to allow goals to be met; including ensuring appropriate program components are in place, organization of administrative and maintenance functions, legal authorities, measures and activities, and design and performance standards.
4. Strive for adjustment of implementation activities to reflect changing conditions; including monitoring and measuring program implementation and making appropriate modifications, conducting necessary system evaluations, implementing a capacity assurance program, and conducting periodic program audits to evaluate implementation and to identify deficiencies and steps to respond to them.
5. Prepare for and respond to emergency events.
6. Communicate with interested parties on the implementation and performance of the CMOM program.

General Performance Standards

As first conceptualized in the 2001 draft proposal, EPA’s CMOM standard permit condition for municipal sanitary sewer collection systems would contain five general performance standards.

The permittee would need to:

1. Properly manage, operate and maintain, at all times, the parts of the collection system that the permittee owns or over which it has operational control.
2. Provide adequate capacity to convey base flows and peak flows.
3. Take all feasible steps to stop, and mitigate the impact of, sanitary sewer overflows.
4. Provide notification to parties with a reasonable potential for exposure to pollutants associated with the overflow event.
5. Develop a written summary of their CMOM program and make it, and required program audits, available to the public upon request.

CMOM Program Components

EPA's proposed CMOM program identifies six components EPA believes are generally necessary to meet the five performance standards in the proposed standard condition. The CMOM program would need to:

1. Identify program goals consistent with the general standards.
2. Identify administrative and maintenance functions responsible for implementing the CMOM program and chain of communication for complying with reporting requirements for SSOs.
3. Include legal authorities necessary for implementing the CMOM program.
4. Address appropriate measures and activities necessary to meet the performance standards.
5. Provide design and performance provisions.
6. Monitor program implementation and measure its effectiveness.