



Water and Sewer
PO Box 330316 • 3071 SW 38 Avenue
Miami, Florida 33233-0316
T 305-665-7471

miamidade.gov

VIA ELECTRONIC CORRESPONDENCE

March 19, 2021

CCN: 63743
File No: 8.DC.06.19

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Tom Mariani
Washington, D.C. 20044-7611
RE: DOJ No. 90-5-1-1-4022/1
Tom.Mariani@usdoj.gov

Chief, Clean Water Enforcement Branch
Water Protection Division
Attn: Brad Ammons
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ammons.Brad@epa.gov

Rachael Amy Kamons
Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
Rachael.Kamons@usdoj.gov

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Jason.Andreotta@dep.state.fl.us

RE: Consent Decree (Case: No. 1:12-cv-24400-FAM), Reference DOJ Case No. 90-5-1-1-4022/1, Section VI – Compliance Requirements, Paragraph 19 – Capacity, Management, Operations, and Maintenance Programs Consolidated Schedule of Implementation Activities, Revised Schedule

Dear Sir/Madam:

In accordance with the provisions of Paragraph 19 of the above referenced Consent Decree (CD), on behalf of Miami-Dade County, the Water and Sewer Department (WASD) submits to both the United States Environmental Protection Agency (EPA) and the State of Florida Department of Environmental Protection (FDEP) the attached revision to the Capacity, Management, Operations, and Maintenance (CMOM) Programs Consolidated Schedule of Implementation Activities. WASD continues to be fully engaged with the successful implementation and compliance of the above referenced CD. Specifically, as CD projects continue to progress and are completed, ongoing and future efforts will ensure that all projects are operated and maintained in compliance with the CMOM Programs.

Pursuant to our discussions during previous CD Program Update conference calls, WASD is submitting a revision to the CMOM Consolidated Schedule of Implementation Activities originally submitted for review and approval on August 6, 2018. The attached revisions to the schedule summarize where implementation activities have been completed, provides

completion dates for ongoing activities, and includes proposed start and end dates for tasks that have not commenced.

In anticipation of EPA/FDEP review and approval of the CMOM Consolidated Schedule, the County has advanced many of the identified implementation activities as follows:

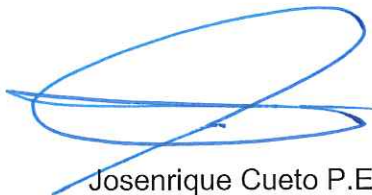
- There are 146 separate actions items that comprise the CMOM Program (attached). Of these:
- Four (4) are recommended for removal (3% of total)
- 29 have been completed (20% of total)
- 68 are ongoing (46% of total)
- 45 have not commenced (31% of total) – a number of these are contingent on the completion of other predecessor activities

Finally, please be advised that WASD will continue to implement the CMOM Program per the attached schedule and will provide periodic updates on the progress to the EPA/FDEP.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions regarding this matter, please call me at (786) 552-8120.

Sincerely,



Josenrique Cueto P.E., ENV SP, LEED® Green Associate
Interim Director, Water and Sewer Department

Attachment: Capacity, Management, Operations, and Maintenance Programs
Consolidated Schedule of Implementation Activities

ec: Anita Patel
Senior Assistant Attorney General, Complex Litigation,
Office of the Attorney General
PL 01 The Capitol
Tallahassee, FL 32399-1050
(850) 414-3694
anita.patel@myfloridalegal.com

Elizabeth Teegen
Senior Assistant Attorney General, Complex Litigation
Office of the Attorney General
PL-01, The Capitol
Tallahassee, FL 32399-1050
850-414-3699
Elizabeth.Teegen@myfloridalegal.com

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Lisa.M.Self@dep.state.fl.us
Mike.Bechtold@dep.state.fl.us
Sed.wastewater@dep.state.fl.us
Meghan.Ticknor@dep.state.fl.us

Madame Mayor Daniella Levine-Cava
Miami-Dade County
111 NW First Street 29th Floor
Miami, Florida 33128

Jimmy Morales, Office of the Mayor
Miami-Dade County Chief Operations Officer
111 NW 1st Street 29th Floor
Miami, FL 33128
Josterholt@miamidade.gov

Angela Benjamin
Assistant County Attorney
Miami-Dade County Attorney's Office
111 NW First Street Suite 2810
Miami, Florida 33128

Richard Elliot, P.E., PMP
Environmental Engineer
Water Protection Division
U.S. Environmental Protection Agency – Region 4
61 Forsyth Street. S.W.
Atlanta, GA 30303
Elliot.Richard@epa.gov

Paul Schwartz
Associate Regional Counsel
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303
Schwartz.Paul@epa.gov

William A. Weinischke
Senior Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044
Bill.Weinischke@usdoj.gov

Task Name	Start	Finish	Notes	2016		2017				2018				2019				2020				2021				2022				2023				2024				2025				2026				2027				2028				2029				2030				2031				2032	
				Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4								
1 Gravity Sewer Systems Operations and Maintenance Program (GSSOMP) - to be incorporated with the Flow Reduction Program																																																																			
1.1 Evaluate Corrosion Control Options		3/31/2017		◆ 3/31/17																																																															
1.2 Deploy smart covers to "hot spots"		1/1/2018		◆ 1/1/18																																																															
1.3 Prioritization for Evaluating Gravity Sewer System (GSS)																																																																			
1.3.1 Develop prioritization process for SSES		-	Completed																																																																
1.3.2 Develop WCTS basin prioritization tool		-	Completed																																																																
1.3.3 Develop night flow identification tool		-	Completed																																																																
1.3.4 Develop GSS evaluation priority data report		-	Completed																																																																
1.4 Gravity Sewer System Asset Assessment																																																																			
1.4.1 Complete asset inventory	3/12/2021	2/1/2022	Ongoing																																																																
1.4.2 Conduct GSS preventative O&M activities, inspections, evaluation surveys and condition assessments (as determined by prioritization strategy)	3/12/2021	12/1/2027	Ongoing																																																																
1.4.3 Establish an annual identification of critical assets process	10/1/2022	4/1/2023	Not started																																																																
1.4.4 Maintenance GSS repairs (as determined by inspections on a 5-year repair cycle)	3/12/2021	2/1/2030	Ongoing																																																																
1.5 Inventory Management System																																																																			
1.5.1 Develop list of critical equipment and critical spare parts	10/1/2022	3/1/2024	Not started																																																																
1.5.2 Develop procedures for updating/maintaining critical spare parts list		-	Completed																																																																
1.6 EAMS Enhancements																																																																			
1.6.1 Implement GraniteNet		6/30/2017	Completed																																																																
1.6.2 Deploy mobile technology (CYAN)		1/1/2018	Completed																																																																
1.6.3 Review EAMS, implement new software and/or new functionality on existing	3/12/2021	5/1/2025	Ongoing																																																																
1.6.4 Develop work order management strategy and protocols	3/12/2021	5/1/2025	Ongoing																																																																
1.6.5 Develop digital manhole inspection form	3/12/2021	10/1/2021	Ongoing																																																																
1.6.6 Incorporate easement observation check and comment boxes. Commence documenting easement accessibility	5/1/2025	11/1/2025	Not started																																																																
1.6.7 Develop and establish training programs and materials	3/12/2021	3/1/2027	Ongoing																																																																
2 Pump Station Operations and Preventative Maintenance Program (PSOPMP) - to be incorporated with the Pump Station Resiliency Program																																																																			
2.1 Pump Station Assessment																																																																			
2.1.1 Develop and issue a Request For Proposals	3/12/2021	2/1/2022	Ongoing																																																																
2.1.2 Develop technical specifications data attributes	1/1/2022	11/1/2023	Not started																																																																
2.1.3 Complete asset inventory (including field site inspections for data acquisitions)	11/1/2023	2/1/2026	Not started																																																																
2.1.4 Conduct condition assessments	11/1/2023	6/1/2026	Not started																																																																
2.1.5 Establish an annual identification of critical assets process	11/1/2024	7/1/2025	Not started																																																																
2.2 Inventory Management System																																																																			
2.2.1 Develop list of critical equipment and critical spare parts	1/1/2022	1/1/2024	Not started																																																																
2.2.2 Develop procedures for updating/maintaining critical spare parts list	1/1/2024	7/1/2025	Not started																																																																
2.3 Preventative/Predictive Maintenance Program																																																																			
2.3.1 Compile equipment manufacturers' recommendations	3/12/2021	3/1/2026	Ongoing																																																																
2.3.2 Review individual station requirements	3/12/2021	8/1/2026	Ongoing																																																																
2.3.3 Review / revise business process	3/12/2021	1/1/2022	Ongoing																																																																
2.3.4 Develop SOPs for maintenance practices (including predictive, preventative, and corrective)	3/12/2021	1/1/2028	Ongoing																																																																
2.3.5 Equipment maintenance schedule	3/12/2021	5/1/2029	Ongoing																																																																
2.3.6 Establish maintenance program (including predictive, preventative, and corrective)	3/12/2021	5/1/2029	Ongoing																																																																
2.4 Standard Emergency Procedures																																																																			
2.4.1 Analyze communication options	5/1/2023	2/1/2024	Not started																																																																
2.4.2 Develop standard emergency O&M procedures (including standard emergency equipment maintenance procedures, standard forms and reports)	1/1/2024	6/1/2025	Not started																																																																
2.4.3 Develop and establish training programs and materials	6/1/2025	11/1/2026	Not started																																																																
2.5 EAMS Enhancements																																																																			
2.5.1 Review EAMS, implement new software and/or new functionality on existing	3/12/2021	5/1/2025	Ongoing																																																																
2.5.2 Develop work order management strategy and protocols	3/12/2021	5/1/2029	Ongoing																																																																
2.5.3 Implement SCADA data integration to support new requirements	3/12/2021	12/1/2029	Ongoing																																																																
2.5.4 Implement warranty tracking	5/1/2026	10/1/2027	Not started																																																																
2.5.5 Implement barcoding system	5/1/2026	10/1/2027	Not started																																																																
2.5.6 Implement mobile solution	3/12/2021	7/1/2021	Ongoing																																																																
2.5.7 Develop and establish training programs and materials	3/12/2021	10/1/2030	Ongoing																																																																
3 Force Main Operations, Preventative Maintenance, and Assessment/Rehabilitation Program (FMOPMARP)																																																																			
3.1 Force Main Assessment and Prioritization																																																																			
3.1.1 Force main criticality assessment and prioritization report	10/17/2017	7/17/2018	Completed																																																																
3.1.2 Force main assessment program (pending EPA's approval of the FM Prioritization Report)	3/12/2021	10/1/2026	Ongoing																																																																
3.1.3 Force main rehabilitation/replacement program	1/1/2024	1/1/2029	Not started																																																																
3.1.4 Force main rehabilitation/replacement program final report	1/1/2029	4/1/2029	Not started																																																																
3.2 Force Main Easements																																																																			
3.2.1 Complete asset inventory	3/12/2021	1/1/2022	Ongoing																																																																
3.2.2 Develop GIS layer	3/12/2021	1/1/2022	Ongoing																																																																
3.2.3 One-time inspection of FM easements	9/1/2021	10/1/2023	Not started																																																																
3.2.4 Easement prioritization	10/1/2022	10/1/2023	Not started																																																																
3.3 Corrosion Control																																																																			
3.3.1 Develop Corrosion Control Specifications and evaluate Corrosion Control Options		3/17/2017	Completed																																																																
3.3.2 Implement industrial discharge pH monitoring Pilot		1/20/2017	Completed																																																																
3.3.3 Develop SOPs for the evaluation of soils	5/1/2021	5/1/2022	Not started																																																																
3.3.4 Develop specifications for the use of Inert materials	5/1/2022	11/1/2022	Not started																																																																
3.3.5 Develop standards for corrosion control options and application thereof to protect the infrastructure from potential deterioration both internally and externally	1/1/2022	6/1/2023	Not started																																																																
3.4 EAMS Enhancements																																																																			
3.4.1 Deploy mobile technology (CYAN)		1/1/2018	Completed	◆ 1/1/18																																																															

