City of Baltimore
Department of Public Works

Modified Consent Decree Program
Revised Operation & Maintenance Plan

Sanitary Sewer Overflow Consent Decree
Civil Action No. JFM-02-1524

November 30, 2026

Contents

1. Introduction 3

2. System-Wide Gravity Sewer Cleaning and Inspection Program 4

2.1. Inspection and Cleaning Programs 4

2.1.1. Standard Operating Protocols for Targeted Inspection and Cleaning 4

3. Manhole Sealing and Maintenance Programs 5

4. Identification and Remediation of Poor Construction 6

4.1. Testing of New and Rehabilitated Construction 6

4.2. Remediation of Improper Construction 6

5. Collection System Lateral Prioritization Program 7

5.1. Program Purpose 7

5.2. Identification 7

5.3. Lateral Inspections and Condition Assessment 7

5.4. Lateral Repair Prioritization 7

5.5. Prioritized List of Collection System Laterals 7

6. Fats, Oils, and Grease Control Program 8

6.1. Inspections of Food Service Establishments 8

7. Root Control Program 9

7.1. Adding Laterals/House Connections to the Root Control Inventory 9

8. Physical or Legal Limited Access Areas 10

8.1.1. Identifying Areas with Limited Physical Access 10

8.1.2. Obtaining Physical Access 10

8.2. Legal Access 10

8.2.1. Obtaining Legal Access 10

9. Information Management System 11

10. Corrective Maintenance Response and Reporting Procedures 12

10.1. Blockages and Overflows 12

11. Mapping of Reoccurring Problems 13

12. Public Education and Outreach Program 14

Appendix A: Targeted Areas 15

Appendix B: Lateral Repair or Replacement 18

1. Introduction

This Revised Operation & Maintenance Report is submitted pursuant to Paragraph 13 of the Modified Consent Decree (MCD) (Civil Action No. JFM-02-1524). The report revises the previous Operation and Maintenance (O&M) Plan to provide for the proper operation and maintenance of the Collection System. In accordance with the MCD, the report includes:

1. System-wide gravity sewer cleaning and inspection program to inspect and clean, if required, sewers greater than eight inches in diameter at least once every seven years and to identify and clean target areas more frequent than every seven years
2. Sealing, where appropriate, and maintenance of manholes
3. Identification and remediation of poor construction
4. Program to prioritize and repair Collection System laterals that cause recurring Building Backups
5. Grease control program
6. Root control program
7. Procedures for updating and maintaining the list of locations where Baltimore City ("the City") does not have ready physical and/or legal access to the Collection System
8. Documentation of complaints, work orders, updates to equipment inventory, and changes to Collection System components into the information management system
9. Corrective maintenance response and reporting procedures
10. Mapping of recurring problems and the effective use of that information in preventing problems that can cause dry weather Sanitary Sewer Overflows (SSOs)
11. Public education and outreach efforts necessary to inform the public of the need to minimize introduction of debris, grease and other items into the Collection System

2. System-Wide Gravity Sewer Cleaning and Inspection Program

The purpose of the gravity sewer inspection and cleaning program is to identify structural or operational deficiencies which may affect a sewer's level of service.

2.1. Inspection and Cleaning Programs

DPW's cleaning and inspection program consists of:

1. Comprehensive inspection and cleaning - DPW will inspect sewers that are larger than 8-inches in diameter and will clean sewers based on inspection findings. Re-inspection frequency shall be every 7 years or based on the sewer's risk rating.
2. Targeted inspection and cleaning - DPW will inspect 8-inch diameter and less sewers that have reoccurring blockages or dry weather SSOs and will clean the sewers based on the inspection findings.
3. DPW will review the inspection data and historical maintenance work orders for sewers experiencing reoccurring blockages and SSOs to determine the root cause and assign the appropriate preventive maintenance work or sewer improvement work. Once included in the appropriate maintenance program, DPW will remove the sewer from the targeted inspection and cleaning program.

2.1.1. Standard Operating Protocols for Targeted Inspection and Cleaning

DPW's targeted inspection and cleaning program as follows:

1. Sewers with reoccurring blockages or dry weather SSOs within the previous three fiscal years will be included in the program
2. A single inspection frequency of three years will be assigned to the sewers
3. Root cause analysis will be completed to identify and assign the appropriate preventive maintenance work to the sewer
4. Sewers will be removed from the targeted inspection and cleaning program after they are assigned the appropriate preventive maintenance work or are no longer candidates in the subsequent target cleaning analysis

Refer to Appendix A for a map and a listing of the targeted pipes.

3. Manhole Sealing and Maintenance Programs

DPW will inspect sewer manholes to:

1. Identify potential Infiltration and Inflow (I/I) sources. DPW will use manhole and other inspection data to assess I/I condition of the Collection System. If the assessment determines excessive I/I exists in a specific portion of the Collection System, DPW may seal or rehabilitate the manholes with potential I/I sources. Repair method will be based on site conditions and manufacturer specifications
2. Identify structural and/or operational defects. DPW will schedule corrective measures or replacement of manholes found to be in unacceptable condition

4. Identification and Remediation of Poor Construction

DPW will inspect manholes to identify poor construction and will direct the contractor, as necessary, to address the defect and comply with the City's standard construction specifications.

DPW will review inspection data to confirm work is completed in accordance with the City's standard construction specifications. DPW will to address defects and comply with the City's standard construction specifications.

4.1. Testing of New and Rehabilitated Construction

DPW will require the contractor to test new and rehabilitated sewers in accordance with the City's standard construction specifications. Testing exceptions are made by modification in the construction contract's specifications or otherwise approved by the City and the design contractor.

4.2. Remediation of Improper Construction

Work orders will be issued for urgent repair of previous improper construction work that may cause a sewer overflow. Field testing will be completed to confirm satisfactory remediation of the improper construction.

5. Collection System Lateral Prioritization Program

5.1. Program Purpose

DPW will maintain a lateral corrective action program as detailed below.

Collection System laterals with acute or catastrophic failures causing Building Backups will be remediated as provided in DPW's Emergency Response Plan (ERP).

5.2. Identification

DPW will review basement backup complaints and field inspection information to identify laterals for possible corrective action work.

5.3. Lateral Inspections and Condition Assessment

For each address considered for lateral corrective actions, DPW will review field data and other information to assess the condition of the lateral and determine an appropriate repair method. Laterals will be removed from repair consideration if there is no recommended repair or if the problem is determined to be a private issue.

5.4. Lateral Repair Prioritization

DPW will prioritize lateral repairs based on the incidence of Building Backups and/or other risk profile.

5.5. Prioritized List of Collection System Laterals

Appendix B includes a list and map of Collection System laterals. A list of laterals from highest to lowest number of recurring Building Backups is also provided in Appendix B.

6. Fats, Oils, and Grease Control Program

In 2013, the fats, oils, and grease ("FOG") program was incorporated into the City's pretreatment program under the authority of Article 25 of the Baltimore City Code. The pretreatment program minimizes the discharge of FOG to the Collection System by requiring grease-generating food service establishments (FSEs) to install and maintain grease control devices (GCDs) properly, and promotes kitchen best management practices (BMPs) to residential and commercial customers.

6.1. Inspections of Food Service Establishments

DPW completes routine FSE inspections and follow-up inspections are conducted on an as-needed basis. In general, the City's response to violations is to issue a Notice of Violation (NOV) and perform a follow-up inspection. When the condition directly violates the Baltimore City Plumbing Code or Food Service Regulations, Baltimore City code enforcement officers from the Baltimore City Department of Housing and Community Development ("DHCD") or the Baltimore City Health Department may be engaged to correct the condition.

The FOG program is enforced through a combination of permit issuance, inspection, and education. Enforcement actions for violations of the FOG program are made in accordance with Article 25 and the Baltimore City DPW's *Enforcement Response Plan for Fats, Oils and Grease (FOG) Generated by Food Service Establishments (FSE) Emergency Response Plan*. In addition, communication with DHCD and the Health Department ensures compliance with the Baltimore City Building Code and Food Service Regulations.

7. Root Control Program

DPW will maintain a root control program. DPW will review inspection data to identify sewers with root intrusion. Sewers will be added to the root control inventory, when appropriate.

Sewers will remain in the inventory until permanent corrective action is completed or it is determined that root control is no longer needed.

7.1. Adding Laterals/House Connections to the Root Control Inventory

DPW may add laterals to the root control inventory, when appropriate.

DPW will remove from the inventory any laterals that have had permanent repairs.

8. Physical or Legal Limited Access Areas

This section describes DPW's activities to identify and remediate areas with limited physical access.

8.1.1. Identifying Areas with Limited Physical Access

Sewer manhole with limited physical access are identified by:

1. Previous sewer system evaluation surveys
2. Attempted manhole inspections
3. Other field investigation work

8.1.2. Obtaining Physical Access

For purposes of construction, access may be provided through temporary roads or existing public trails. In other cases, permanent access roads may be constructed.

In order to address temporary access issues, crews will attempt to contact the property owner to schedule a follow-up inspection. If practicable, the property owner will be asked to address the access impairment.

8.2. Legal Access

When Collection System assets are installed on property that is not owned by the City, access may be provided through an easement. If City-owned property is transferred to non-City ownership, easements may also be retained to ensure continued access to utility assets.

8.2.1. Obtaining Legal Access

If a potential easement issue is identified, the City will research records to determine property ownership. If the research is unsuccessful, negotiations may begin to acquire a new easement. If negotiations are unsuccessful, the City may initiate condemnation proceedings to acquire an easement. Independent of condemnation proceedings, the City also maintains legal authority under Article 25 of the Baltimore City Code to regulate or repair sewer assets on public or private property.

9. Information Management System

DPW will maintain an information management system to document information regarding the operation, maintenance, and performance of the Collection System. The system will include a:

- Customer Service Request (CSR) system to record/track customer complaints
- Computerized maintenance management system to record and track maintenance work activities.
- Geographic Information System (GIS) to geographically locate wastewater assets

10. Corrective Maintenance Response and Reporting Procedures

Customer complaints will be recorded in the City's 311 system, and a service request (SR) will be created for each complaint. DPW will record SRs in a computerized maintenance management system and record/track associated response work.

10.1. Blockages and Overflows

DPW will mobilize an investigator to inspect the blockage/overflow area and determine corrective actions. The investigator will create a work order to mobilize the appropriate resources to complete corrective work.

After a blockage or overflow event, DPW will perform a root cause analysis for SSO events to determine if supplemental maintenance work is needed.

DPW will review all SSO 5-day reports for quality assurance before submission to the Maryland Department of the Environment (MDE). The quality assurance review will be completed so that the reports are provided to MDE within the required time frame.

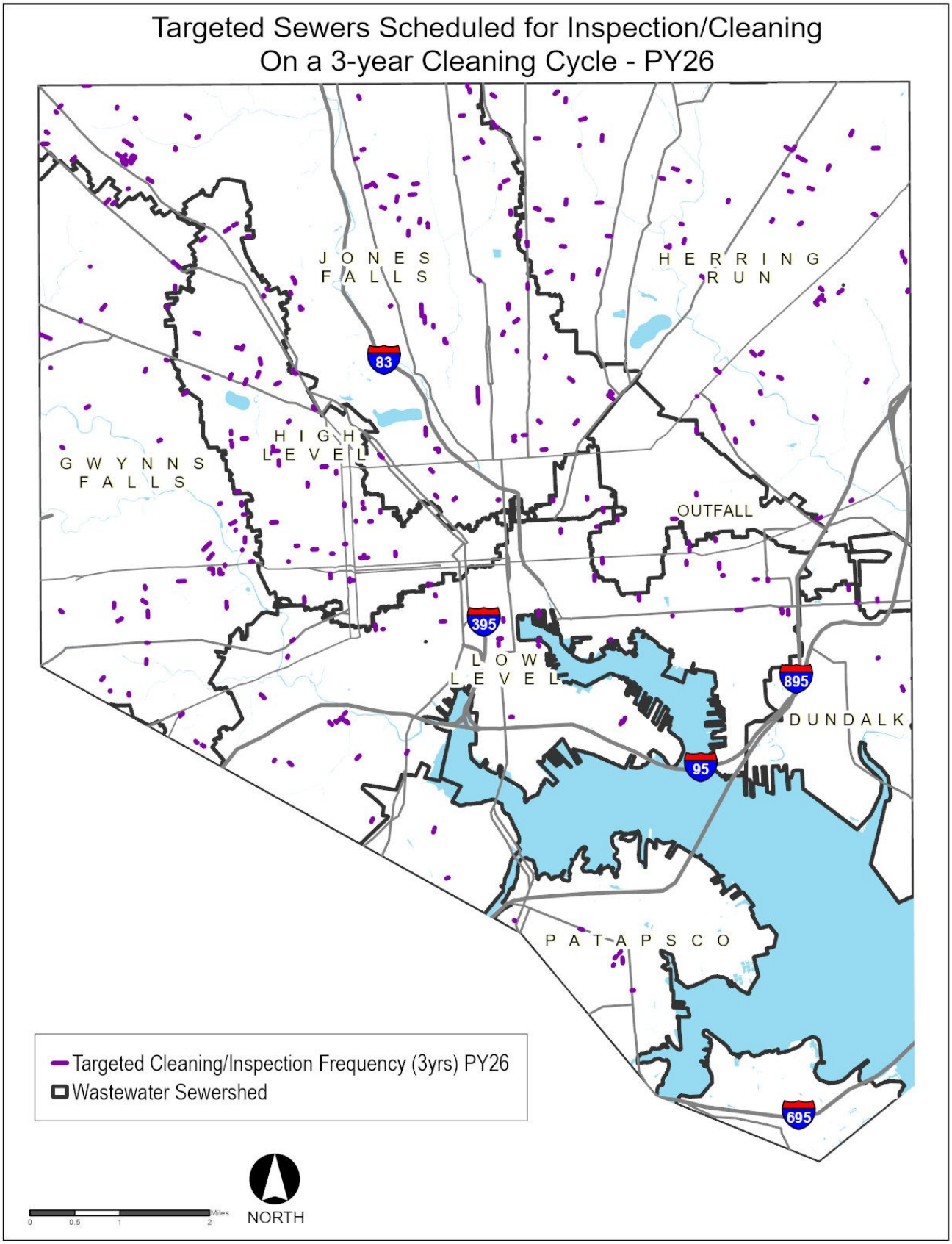
11. Mapping of Reoccurring Problems

DPW will utilize the SSO root cause analysis and information management system data to map locations of reoccurring SSO/maintenance issues. DPW will review the map and other data to identify and schedule future maintenance corrective action work.

12. Public Education and Outreach Program

DPW will maintain a website to provide public education/outreach information regarding the MCD program.

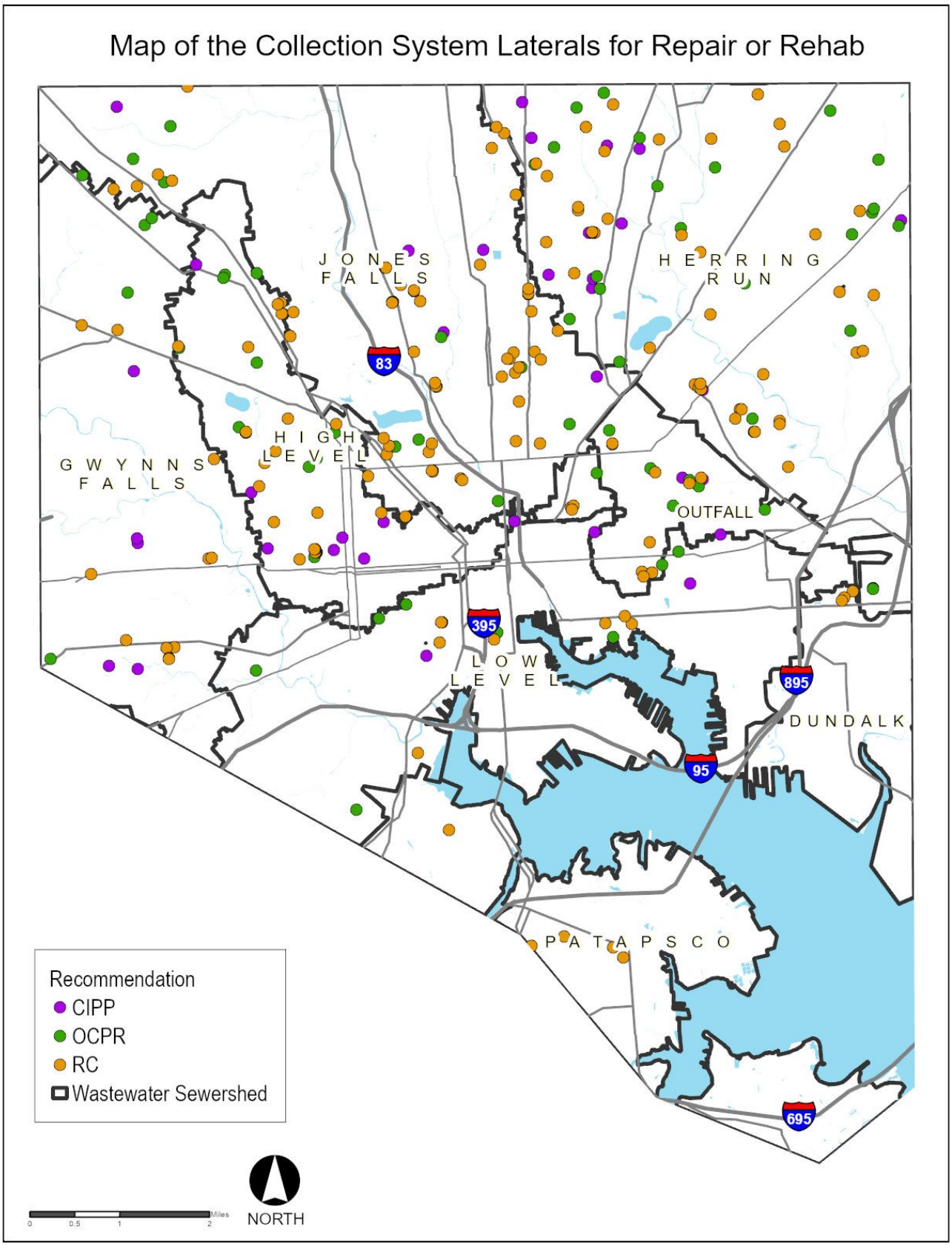
Appendix A: Targeted Areas


Targeted Sewers Scheduled for Inspection/Cleaning
On a 3-year Cleaning Cycle - PY26
JONES FALLS
HERRING RUN
83
HIGH LEVEL
GWYNNS FALLS
OUTFALL
395
LOW LEVEL
895
DUNDALK
95
PATAPSCO
695
Targeted Cleaning/Inspection Frequency (3yrs) PY26
Wastewater Sewershed
0
0.5
1
2
Miles
NORTH

Summary of Targeted Cleaning Program				
Sewershed	**3-year incident history**			**3-year sewer linear footage**
	Blockages	**Dry-weather SSOs**	**SSO volume (gal)**	**Targeted cycle**
Dundalk	36	10	50,766	684
Gwynn's Falls	262	69	347,337	10,392
Herring Run	403	83	1,180,437	16,048
High Level	284	104	34,632	11,173
Jones Falls	528	144	4,615,502	20,020
Low Level	303	84	51,762	9,404
Outfall	67	25	35,270	1,481
Patapsco	66	10	12,139	1,648
Total	**1,949**	**529**	**6,327,845**	**70,849**

Appendix B: Lateral Repair or Replacement

Map of the Collection System Laterals for Repair or Rehab



Address	Number of Building Backups	Corrective action		
		Cured-in-place lining (CIPP)	Open Cut Point Repair (OCPR)	Root control (RC)
1109 WICKLOW RD	12	X		
514 ORKNEY RD	11	X		
2833 WEST LANVALE STREET	9	X		
18 CHARLCOTE PL	8	X		
3206 CLARKS LANE	8	X		
1214 EVESHAM AV	7	X		
1600 EAST MADISON STREET	7	X		
1616 EDMONDSON AV	7	X		
2015 RAYNER AV	7	X		
1166 WEST HAMBURG STREET	6	X		
1302 SOUTHVIEW RD	6	X		
4123 KATHLAND AV	6	X		
4424 PARKTON STREET	6	X		
4635 MARBLE HALL RD	6	X		
737 SPRINGFIELD AV	6	X		
1130 KEVIN RD	5	X		
206 EAST EAGER STREET	5	X		
2873 MAYFIELD AV	5	X		
301 JOPLIN STREET	5	X		
3630 BEECH AV	5	X		
438 SOUTH WICKHAM RD	5	X		
4415 FOREST VIEW AV	5	X		
637 NORTH HIGHLAND AV	5	X		
108 WOODLAWN RD	4	X		
1108 WOOD HEIGHTS AV	4	X		
1518 STONEWOOD RD	4	X		
1522 RAMBLEWOOD RD	4	X		
35 SOUTH LINWOOD AV	4	X		
1205 ARGONNE DR	3	X		
1312 RIGGS AV	3	X		
1420 EDISON HIGHWAY	3	X		
1503 EAST 29TH STREET	3	X		
415 HOLLEN RD	3	X		
1501 KENHILL AV	2	X		
1924 WEST LAFAYETTE AV	2	X		
2928 BAKER STREET	2	X		
4825 CORDELIA AV	2	X		
2314 ARUNAH AV	19		X	

2811 WEST STRATHMORE AV	15		X	
1629 NORTH MONTFORD AV	10		X	
2 EAST PRESTON STREET	10		X	
3601 GARRISON BLVD	10		X	
409 NORTH BELNORD AV	10		X	
5409 CEDELLA AV	10		X	
1322 NORTH ELLWOOD AV	9		X	
313 JOPLIN STREET	9		X	
1723 LANCASTER STREET	8		X	
1724 EAST 25TH STREET	8		X	
19 SOUTH ARLINGTON AV	8		X	
2122 KOKO LANE	8		X	
3440 VIRGINIA AV	8		X	
100 WEST BARRE STREET	7		X	
1800 EAST 32ND STREET	7		X	
3029 PIEDMONT AV	7		X	
4409 RASPE AV	7		X	
5950 GLEN FALLS AV	7		X	
1422 NORTH POTOMAC STREET	6		X	
153 NORTH MILTON AV	6		X	
2104 SOUTHERN AV	6		X	
2406 EUTAW PL	6		X	
3027 WYLIE AV	6		X	
3402 PINKNEY RD	6		X	
400 EAST 31ST STREET	6		X	
4012 LOCH RAVEN BLVD	6		X	
4642 HARCOURT RD	6		X	
625 WEST 36TH STREET	6		X	
6507 HOPETON AV	6		X	
6801 EVERALL AV	6		X	
827 EAST BELVEDERE AV	6		X	
1210 GITTINGS AV	5		X	
1310 SOUTHVIEW RD	5		X	
1618 NORTH BROADWAY	5		X	
2209 CLIFTON AV	5		X	
3664 CHESTERFIELD AV	5		X	
3727 KIMBLE RD	5		X	
4311 PENHURST AV	5		X	
927 NORTH KRESSON STREET	5		X	

113 SOUTH STRICKER STREET	4		X	
1719 LANCASTER STREET	4		X	
2307 EAST FAIRMOUNT AV	4		X	
2320 GARRETT AV	4		X	
2603 WEGWORTH LANE	4		X	
3015 ROSALIE AV	4		X	
4629 REISTERSTOWN RD	4		X	
5516 PILGRIM RD	4		X	
601 SOUTH LONGWOOD STREET	4		X	
6123 CHINQUAPIN PARKWAY	4		X	
1705 WOODBOURNE AV	3		X	
1910 RUXTON AV	3		X	
2408 REISTERSTOWN RD	3		X	
241 MALLOW HILL RD	3		X	
2709 EAST CHASE STREET	3		X	
3702 ROSEDALE RD	3		X	
6203 EVERALL AV	3		X	
6215 EVERALL AV	3		X	
812 WHITELOCK STREET	3		X	
1503 SHERWOOD AV	2		X	
2207 CLIFTON AV	2		X	
3410 ROCKWOOD AV	2		X	
5506 JONQUIL AV	2		X	
5512 RUBIN AV	2		X	
5642 GOVANE AV	2		X	
306 SOUTH AUGUSTA AV	23			X
1200 WHITELOCK STREET	20			X
2837 MAYFIELD AV	14			X
5121 LIBERTY HEIGHTS AV	14			X
3216 GUILFORD AV	11			X
1228 MERIDENE DR	10			X
2018 NORTH WOLFE STREET	10			X
2111 GARRISON BLVD	10			X
2716 EAST NORTHERN PARKWAY	10			X
3213 GUILFORD AV	10			X
2514 NORTH LONGWOOD STREET	9			X
3607 MENLO DR	9			X
3982 ELM AV	9			X

5649 GOVANE AV	9			X
642 GORSUCH AV	9			X
1202 WEST 40TH STREET	8			X
1427 WINSTON AV	8			X
1910 EASTERN AV	8			X
2102 ERDMAN AV	8			X
2302 HARLEM AV	8			X
2801 MAYFIELD AV	8			X
3611 GWYNN OAK AV	8			X
3725 FAIRHAVEN AV	8			X
5809 ETHELBERT AV	8			X
6003 BELLONA AV	8			X
912 EAST 36TH STREET	8			X
2304 HARLEM AV	7			X
2440 KEYWORTH AV	7			X
2500 WILDPARK AV	7			X
2710 GRINDON AV	7			X
2801 JOPLEA AV	7			X
4011 3RD STREET	7			X
423 SOUTH AUGUSTA AV	7			X
5071 EAST FEDERAL STREET	7			X
525 EAST 38TH STREET	7			X
5711 NEWHOLME AV	7			X
6211 FAIRDEL AV	7			X
731 RICHWOOD AV	7			X
1558 ARGYLE AV	6			X
1602 WADSWORTH WY	6			X
1649 POPLAR GROVE STREET	6			X
2437 MADISON AV	6			X
3603 GARRISON BLVD	6			X
3941 GREENMOUNT AV	6			X
408 DREW STREET	6			X
4109 ARDLEY AV	6			X
425 SOUTH AUGUSTA AV	6			X
431 CORNWALL STREET	6			X
5504 ALHAMBRA AV	6			X
5604 ANTHONY AV	6			X
702 PURITAN STREET	6			X
834 WOODWARD STREET	6			X
1020 WEST 42ND STREET	5			X
1212 EAST BELVEDERE AV	5			X

1431 NORTH ELLWOOD AV	5			X
2006 NORTH DUKELAND STREET	5			X
2102 PARK AV	5			X
2132 BOLTON STREET	5			X
2310 HARLEM AV	5			X
2411 WILLOW GLEN DR	5			X
2512 NORTH LONGWOOD STREET	5			X
2553 MADISON AV	5			X
2827 LAKE AV	5			X
303 SOUTH COLLINS AV	5			X
3105 TYNDALE AV	5			X
3521 CLIFTMONT AV	5			X
3718 ELMLEY AV	5			X
3833 RAVENWOOD AV	5			X
3903 ROSECREST AV	5			X
4105 ROLAND AV	5			X
4722 EDMONDSON AV	5			X
5210 THE ALAMEDA	5			X
700 CUMBERLAND STREET	5			X
1106 WOOD HEIGHTS AV	4			X
1210 WEST 40TH STREET	4			X
1230 EAST CHASE STREET	4			X
1701 GWYNNS FALLS PARKWAY	4			X
2015 FLEET STREET	4			X
2024 NORTH WOLFE STREET	4			X
2111 LOUISE AV	4			X
2313 WEST LANVALE STREET	4			X
2336 IVY AV	4			X
2527 SHIRLEY AV	4			X
2902 WESTFIELD AV	4			X
3 NORTH COLLINGTON AV	4			X
305 EAST BELVEDERE AV	4			X
3240 YOSEMITE AV	4			X
3943 GREENMOUNT AV	4			X
415 HOMELAND AV	4			X
4405 GREENWAY	4			X
520 SOUTH BROADWAY	4			X
5931 CHINQUAPIN PARKWAY	4			X

606 EAST 33RD STREET	4			X
708 NORTH EDGEWOOD STREET	4			X
1233 NORTH BENTALOU STREET	3			X
1311 CAMBRIA STREET	3			X
1419 JOHN STREET	3			X
1818 BOLTON STREET	3			X
2207 ASHBURTON STREET	3			X
2208 EAST FAIRMOUNT AV	3			X
2308 HARLEM AV	3			X
2309 WEST LANVALE STREET	3			X
2319 EAST FAIRMOUNT AV	3			X
2525 ARUNAH AV	3			X
2861 MAYFIELD AV	3			X
3024 ABELL AV	3			X
332 FOLCROFT STREET	3			X
3406 HICKORY AV	3			X
3707 BAYONNE AV	3			X
388 EAST 31ST STREET	3			X
4127 THE ALAMEDA	3			X
4704 AMBERLEY AV	3			X
5014 FRANKFORD AV	3			X
5216 THE ALAMEDA	3			X
5409 SPRINGLAKE WY	3			X
604 WASHBURN AV	3			X
700 PURITAN STREET	3			X
732 MCHENRY STREET	3			X
738 MCHENRY STREET	3			X
1110 NORTH CENTRAL AV	2			X
1113 NORTH CENTRAL AV	2			X
118 WEST LEE STREET	2			X
1208 WEST 40TH STREET	2			X
1209 NORTH CALHOUN STREET	2			X
1402 NORTH POTOMAC STREET	2			X
1407 JOHN STREET	2			X
1602 NORTH MILTON AV	2			X
1810 BOLTON STREET	2			X
1814 BOLTON STREET	2			X

2119 HOMEWOOD AV	2			X
2212 SIDNEY AV	2			X
2324 MCELDERRY STREET	2			X
2516 NORTH LONGWOOD STREET	2			X
2606 OSWEGO AV	2			X
2610 VIOLET AV	2			X
2626 OSWEGO AV	2			X
2719 WINCHESTER STREET	2			X
3002 NORTH CALVERT STREET	2			X
317 EAST 22ND STREET	2			X
3207 LEIGHTON AV	2			X
328 EAST 33RD STREET	2			X
3403 DEVONSHIRE DR	2			X
341 EAST 27TH STREET	2			X
3513 CLIFTMONT AV	2			X
3839 RAVENWOOD AV	2			X
4027 GREENMOUNT AV	2			X
4103 ROLAND AV	2			X
4126 RAYMONN AV	2			X
4426 SHAMROCK AV	2			X
4625 NORTHWOOD DR	2			X
4627 NORTHWOOD DR	2			X
4634 NORTHWOOD DR	2			X
4636 NORTHWOOD DR	2			X
4730 FREDERICK AV	2			X
5406 SEWARD AV	2			X
5933 CHINQUAPIN PARKWAY	2			X
705 LINNARD STREET	2			X
708 PURITAN STREET	2			X
719 BAY STREET	2			X
734 MCHENRY STREET	2			X
736 MCHENRY STREET	2			X