

Appendix C

Documentation of State and
Municipal Interviews

Documentation of State and Municipal Interviews

Data collection for this report involved a series of site visits and telephone interviews. Such data collection efforts were conducted in accordance with an Information Collection Request (ICR 2063.01), which was approved by OMB on September 16, 2002 (OMB No. 2040-0248).

Site Visits

EPA conducted site visits to seven states to obtain specific information regarding CSOs and SSOs for the report. The states visited include Connecticut, Kansas, Maryland, Missouri, North Carolina (SSO only), Oklahoma (SSO only), and Rhode Island. While there, EPA met with permitting staff to discuss programmatic issues related to CSO and SSO discharges. EPA also accessed the NPDES authority's electronic data management system for SSOs, where available.

North Carolina was specifically visited to obtain information on its collection system permitting program. Oklahoma was selected for a site visit to collect information on the state's collection system program used to address SSOs and other sewer system issues. The five states with both CSSs and SSSs— Connecticut, Kansas, Maryland, Missouri, and Rhode Island— were selected for site visits, because CSO permit file reviews were not conducted in these states for the *2001 Report to Congress—Implementation and Enforcement of the CSO Control Policy* (EPA 2001). The information gathered from these states was used to update the inventory of CSO outfalls, documented in Appendix D of this report.

EPA also conducted site visits to regional offices, municipal governments, sewer utilities and non-governmental organizations. EPA visited EPA Region 4 offices in Atlanta, GA, to collect pertinent information about the region's Management, Operation and Maintenance (MOM) program, and to review program files. EPA conducted site visits to Orange County and San Francisco, California. In Orange County, EPA met with the Orange County Sanitation District to gather SSO information and met with the Orange County Health Care Agency to collect beach monitoring data (including beach closings and postings). In San Francisco, EPA met with the San Francisco Public Utilities Commission to discuss CSO and environmental impact data. Moreover, EPA met with *Save the Bay* in Rhode Island and *Heal the Bay* in the greater Los Angeles-area to collect CSO and SSO-related information.

Public Health State and Municipal Phone Interviews

EPA also conducted interviews with public health personnel. State or territorial epidemiologists and local public health officials were the primary sources of data. During these interviews, EPA gathered data on pathogen sources, contaminated water exposures, and illness tracking. In addition, EPA inquired about innovative local programs in place to monitor CSOs or SSOs and/or waterborne illnesses. Through these interviews, EPA sought a clearer understanding of the roles and responsibilities of these agencies in preventing, tracking, and monitoring potential human health impacts associated with CSO and SSO discharges within their jurisdiction.

States and communities were selected from each EPA region in an attempt to ensure geographic, climatic, and population variability among communities interviewed. Nevertheless, the sample was intentionally biased, targeting communities that were likely to have health data related to CSOs and SSOs, or which employed noteworthy water quality monitoring or waterborne disease outbreak tracking techniques. In total, officials from even states and 23 municipalities, as shown in Appendix I, were interviewed.

CSO and SSO Municipal Telephone Interviews

In order to gather representative information to characterize CSOs and SSOs, EPA interviewed officials with 85 sewer agencies, 40 with CSSs and 45 with SSSs, which varied widely in terms of service area, population served, and sewer age. For example, EPA interviewed officials representing systems that served as few as 75 people to systems that served over one million people. In total, EPA interviewed municipal officials in 27 states by telephone. In some states, both CSO and SSO interviews were conducted. State NPDES authorities were contacted in advance of any interviews conducted within their states. At that time, EPA briefly interviewed state officials to gather information about environmental and human health impacts as well as cost information relevant to CSO and SSO discharges.

Potential CSO and SSO interviewees was selected as follows. For the CSO interviews, a list of CSO permittees that had developed and/or implemented CSO controls were extracted from the inventory of CSO permits (Appendix D). A list of unique entities with SSSs, which have reported at least one SSO, was extracted from the SSO data management system described in Appendix G. SSO communities studied in EPA fact sheets (EPA 2003) were excluded from consideration. A random sampling was taken from the CSO and SSO lists to create the pool of potential interviews. Municipal officials unable or unwilling to participate in the survey were replaced with alternate candidates.

Through the CSO interviews, EPA gathered information about collection systems, treatment plants (if applicable), operational responsibility, CSO events, environmental and human health impacts from CSO discharges, LTCP implementation, and funding. As part of the SSO interviews, EPA collected information about collection systems, treatment plants (if applicable), operational responsibility, SSO events, environmental and human health impacts from SSO discharges, O&M, and funding.

References

EPA. 2003. Office of Water. "Featured Factsheets, Case Studies, and Other Information." Retrieved October 3, 2003. <http://cfpub2.epa.gov/npdes/sso/featuredinfo.cf>.

EPA. 2001. Office of Water. *Report to Congress- Implementation and Enforcement of the Combined Sewer Overflow Control Policy*. EPA 833-R-01-003.