UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 27 2000

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Compliance and Enforcement Strategy Addressing Combined Sewer Overflows and Sanitary Sewer Overflows

FROM: Steven A. Herman
Assistant Administrator

TO: Water Management Division Directors, Regions I - X
Enforcement Division Directors, Regions I, II, VI, and VIII
Regional Counsels, Regions I - X

Combined sewer overflows (CSOs) and sanitary sewer overflows (SSOs) present important concerns for public health and the environment. To address these concerns, we need to increase Federal and State enforcement and compliance assistance in these areas. Attached is the Office of Enforcement and Compliance Assurance's (OECA) Compliance and Enforcement Strategy for CSOs and SSOs to address and remedy the threat to public health and the environment caused by overflows from municipal sewer collection systems. This strategy was developed through the cooperative efforts of EPA Headquarters and Regional staff. In June 1999, OECA established a Workgroup of Regional personnel to aid in final development and proper implementation of this strategy. All Regions and the Office of Wastewater Management were represented on the Workgroup, and the strategy reflects a great deal of hard work by you and your staffs.

As many of you know, EPA convened a Federal Advisory Committee (FAC) to provide recommendations on how the Agency should address SSOs. EPA is developing a proposed rule to address SSOs consistent with the work of the SSO Federal Advisory subcommittee. This strategy does not change any existing Agency policy. However, the Regions should be prepared to adjust their SSO response plans so that they are consistent with future SSO guidance that is expected to be issued later this year.

The cornerstone of the strategy is the development of Regional response plans for both CSOs and SSOs. The Regional plans should include enforcement and compliance assistance targets based on the factors outlined in the strategy. However, development of these response plans should not delay any ongoing or prospective Regional action against any known violators, as the Agency's highest priority is still to address significant violators expeditiously. The Regional plans for CSOs and SSOs should be submitted to my office **within sixty days from the date of this transmittal memorandum.**

The attached CSO/SSO strategy sets out expectations for compliance and enforcement activities to be implemented by EPA Regions and States. This strategy does not change existing Agency policy on CSOs or SSOs. The strategy is designed to promote the enforcement and compliance assistance components of the EPA CSO Control Policy (April 19, 1994), the joint OECA/OW memorandum "Enforcement Efforts Addressing Sanitary Sewer Overflows" (March 7, 1995), and Chapter X of the Enforcement Management System (EMS) entitled "Enforcement Management System Guidance on Setting Priorities for Addressing Discharges from Sanitary Sewers" (March 7, 1996). Furthermore, the strategy supports the Memorandum of Agreement (MOA) for Regional performance expectations, the Clean Water Action Plan, and the Agency's Strategic Plan. I encourage Regions and States to coordinate their NPDES permitting and enforcement efforts closely when developing their CSO and SSO enforcement strategies.

CSO and SSO response plans should recognize wet weather planning on a watershed basis. To the extent watersheds are targeted under this strategy, all permitted wastewater utilities and any associated satellite utilities located in the selected watersheds should be appropriately addressed. In individual cases where a municipality is negotiating in good faith, injunctive relief sought in an enforcement action should be comprehensive in addressing any CSO, SSO and storm

water problems within the municipality's watershed.

I commend those Regions that have already made significant progress to date in implementing both the CSO Policy and Chapter X of the EMS. Region IV in particular has been a leader in program development to address CSOs and SSOs. Specifically, the Region IV Capacity, Management, Operation and Maintenance (CMOM) and municipal self-audit program have met with great success to date, and I encourage you to explore the Region IV program as you implement this strategy. We need to build on these successes and foster continued vigilance within EPA Regions and States in a national effort to protect public health and the environment from the threat posed by sewage overflows.

Should you have any questions, please contact Brian Maas, Director of the Water Enforcement Division, at (202) 564-2240, or have your staff contact the appropriate staff member identified in the strategy. We look forward to working with you on this important CSO and SSO enforcement and compliance assistance strategy.

Attachment

cc: Mike Cook, OWM
Charles Sutfin, OWM

April 27, 2000

COMPLIANCE AND ENFORCEMENT STRATEGY FOR CSOs AND SSOs

I. INTRODUCTION

The objective of this strategy is to ensure that CSO and SSO violations are properly addressed through the continuing implementation of the CSO Control Policy (April 19, 1994, 59 FR 18688), the joint OECA/OW memorandum "Enforcement Efforts Addressing Sanitary Sewer Overflows" (March 7, 1995), and the Chapter X "Enforcement Management System Guidance on Setting Priorities for Addressing Discharges from Sanitary Sewers" (EMS Guidance - Chapter X, March 7, 1996).

EPA convened a Federal Advisory Committee (FAC) to provide recommendations on how the Agency should address SSOs. EPA is developing a proposed rule to address SSOs consistent with the work of the SSO Federal Advisory subcommittee. This strategy does not change any existing Agency policy. However, the Regions should be prepared to adjust their SSO response plans so that they are consistent with future SSO guidance that is expected to be issued later this year.

This strategy is consistent with the FY 2000/2001 Memorandum of Agreement (MOA) priorities for wet weather as well as the Clean Water Action Plan (CWAP), including targeting of high priority watersheds.

II. Regional Compliance and Enforcement Plans

Under this strategy, each Region should develop a compliance and enforcement response plan to implement the components of this strategy outlined below. The NPDES permitting, compliance assistance, and enforcement programs, taken together, are the Agency's key regulatory tools to ensure that the requirements of the Clean Water Act (CWA) are met. Regions and States should coordinate their NPDES permitting and enforcement efforts closely

when developing their CSO and SSO response plans. **The Regional plans for CSOs and SSOs should be submitted to the**

Assistant Administrator for the Office of Enforcement and Compliance Assurance (OECA) within sixty days from the date of the strategy's transmittal memorandum.

The Regions have flexibility in developing their plans, but the goals of this document should be met. It is important that each plan include: (1) a systematic approach to address wet weather violations through compliance assistance and enforcement, (2) the identification of compliance and enforcement targets, and (3) details on NPDES State participation, including tracking of State CSO/SSO compliance and enforcement activities. Development of these response plans should not delay any ongoing or prospective Regional action against known violators, as the Agency's highest priority is still to address significant violators expeditiously.

The Agency is committed to planning and implementation of CSO, SSO and storm water programs on a watershed basis. Regions are encouraged to develop CSO and SSO response plans that recognize wet weather planning on a watershed basis. Enforcement remedies requiring major capital improvements should give priority to protecting the most sensitive areas of the watershed (e.g. beaches and shellfish beds).

It is envisioned that Headquarters, Regions, and NPDES States will work together to achieve the goals of the strategy. Federal enforcement, including the initiation of civil judicial actions, should be a key element of the Regional plans. In individual judicial actions where a municipality is negotiating in good faith, injunctive relief sought should be comprehensive in addressing any CSO, SSO and storm water problems within the municipality's watershed. These global settlements of wet weather violations may only be possible if a municipality has a final watershed plan. However, enforcement remedies should not be delayed by watershed plan development.

A. CSO Response Plan

Each CSO response plan should, at a minimum, describe an approach and timetable within FY 2000 by which the Region and/or NPDES States will examine all CSO communities to ensure that they are under an enforceable mechanism (e.g. NPDES

Permit, administrative order) requiring implementation of the Nine Minimum Controls (NMC) and development of a Long Term Control Plan (LTCP). The response plan should also indicate where coordination with the permitting authority is necessary to ensure that NPDES permit requirements for CSOs contain the appropriate
requirements. If an existing CSO permit does not require these steps and it is not necessary to make an inspection, the Region or State should bring a formal enforcement action in FY 2000, where appropriate. The Regional plan should also include a process and timetable for the Region or States to inspect all CSO communities within the Region by the end of FY 2001, and to take appropriate action when they are not in compliance with CSO requirements in permits or existing enforcement orders. Any enforcement action should, at a minimum, require implementation of the NMC and development of an LTCP. Additional appropriate relief that may be sought in a judicial action may include sediment remediation, construction of greenways, and other measures that remediate past harm to the environment or public health caused by CSOs.

B. SSO Response Plan

The Regional SSO response plan should at a minimum describe the approach the Region and NPDES States will use to develop an SSO inventory of systems with SSO violations, and how this inventory will be addressed under the EMS Guidance - Chapter X. The Regional plan should also cover compliance assistance for small communities to address SSO related municipal deficiencies.

The initial SSO inventory as described below in the Sanitary Sewer Overflows section is due from each Region by July 28, 2000. As a goal, the FY 2000/2001 MOA guidance directs the Regions to address (under the EMS guidance) 20% of the priority systems each fiscal year, including FY 2000. Specific percentages are negotiated individually with each Region through the MOA approval process.

III. Combined Sewer Overflows

A. Background

On April 19, 1994, EPA published its CSO Control Policy (59 FR 18688). The CSO Control Policy describes the process for controlling CSOs and achieving compliance with the technology-based and water quality-based requirements of the CWA. Under the CSO Control Policy, the Agency expected that all CSO communities would have implemented the NMC by January 1, 1997. The Agency also anticipated that CSO communities would develop Long Term Control Plans (LTCP) for achieving compliance with the technology based and water quality based requirements of the CWA.

On November 18, 1996, the Assistant Administrators for OECA and the Office of Water notified the Regions that controlling CSOs and implementation of the CSO Policy are high Agency priorities. The memorandum reminded the Regions that the deadline for implementation of the NMC was January 1, 1997, and that an enforceable obligation to meet the NMC, either through a permit condition or administrative order, should be in place by that date.

In a May 19, 1998 memorandum, the Assistant Administrators again stressed to the Regions the importance of controlling CSOs. The memorandum highlighted the fact that all CSO communities have not implemented the NMC and were not developing LTCP. Compliance monitoring, compliance assistance, and enforcement actions are essential to ensure that all CSO communities move aggressively toward the goals of the CSO policy and the CWA.

In a July 7, 1999 memorandum to the Regions, Headquarters stressed the need for coordination of enforcement, permitting, and water quality programs in CSO enforcement cases and provided guidance on how this cooperation can be achieved. The memorandum also provided guidance on how the NMC and LTCP control measures, in conjunction with properly applied WQS, can be evaluated in terms of complying with the technology-based and water quality-based requirements of the CWA.

B. Elements of Regional CSO Response Plan

1. Compliance Determination

Since the CSO universe is limited (the Regions already have an inventory of the major and minor CSO permittees within their Region), this strategy calls for a system-by-system analysis to determine whether the POTW is in compliance with its NPDES permit, Administrative Order or Judicial Order. The Region and States should thoroughly review each CSO community to independently determine its compliance status. Regions could consider using the Region V CSO Program Evaluation/Checklist when conducting inspections of CSO facilities.

In assessing the compliance status of each combined sewer system, the Region should examine the following:

1. Determine whether existing permits and administrative orders are properly written to require implementation of the NMC and development of an LTCP;

2. Determine whether the permittee is implementing the NMC;

3. Determine whether the permittee is developing an LTCP to comply with the technology-based and water quality-based requirements of the CWA; and

4. If a permittee has developed an LTCP, determine whether the control measures required by the plan are being implemented.

These requirements may be in a permit, administrative order, or civil judicial order.

2. Priorities for Enforcement Response

The Regions and States should consider site-specific environmental and public health impacts from CSOs when prioritizing enforcement actions. Enforcement efforts should be prioritized by looking at beach and shellfish bed closures, source water protection areas, impaired watersheds, and other

sensitive areas as provided for in the CWAP and the 2000/2001 MOA wet weather priorities. The CSO Policy Section V.C. states, "NPDES authorities should set priorities for enforcement based on environmental impacts or sensitive areas affected by CSOs."

The following are priorities that Regions should also consider in developing CSO enforcement responses:

1. Eliminate dry weather CSOs;

2. Require implementation of the NMC and require the development of a LTCP;

3. Correct noncompliance with CSO provisions in a permit or a past enforcement action.

If a permit does not require implementation of the NMCs and/or development of a LTCP, the Region should include these requirements in an enforcement action for violations that could be corrected by the implementation of NMC and/or development of LTCP. Types of violations include, for example, unpermitted discharges or permit violations related to improper Operation and Maintenance (O&M) or exceedences of water quality standards. Compliance schedules should provide for implementation of NMCs and development of LTCPs that would correct O&M and WQS problems. Penalties (whether administrative or judicial) should be sought for past and ongoing violations, where appropriate, as outlined in the CSO Control Policy, Section V.D., and the Clean Water Act Settlement Penalty Policy.

The Regional CSO response plan should clearly outline a systematic approach that the Region will use to ensure compliance. The Regions should use Section 308 Information Requests, Administrative Orders, Consent Orders, Section 309(g) Administrative Penalty Orders, Section 309(b) civil judicial actions and Section 504 Emergency Powers in implementing the enforcement portion of the strategy. For permit violations, Regional plans should call for, at a minimum, Administrative Penalty Orders. If a permittee is in violation of an Administrative Order, a judicial action should be considered. However, issuance of an AO is not required prior to initiating a judicial action. CSO enforcement personnel should coordinate with the permitting and water

quality programs, for example, as set forth in the July 7, 1999, memorandum from EPA Headquarters that was discussed in an earlier section of this strategy.

3. Priorities for Compliance Assistance

Even though CSO enforcement is a high priority and the deadlines in the CSO Policy have long passed, there may be circumstances in small communities where compliance assistance could be appropriate. The Regions have several tools available to provide compliance assistance. These tools include (1) guidance documents developed by the Office of Wastewater Management, and (2) the Local Government Environmental Assistance Network (LGEAN). LGEAN is designed to help local government officials stay on top of the latest environmental requirements and technologies. LGEAN is an environmental assistance network coordinated by the International City/County Management Association (ICMA) in partnership with the Water Environment Federation (WEF), the Air and Waste Management Association (A&WMA), the American Water Works Association (AWWA), the Solid Waste Association of North America (SWANA), the Environmental Council of States (ECOS), and the National Association of Counties (NACO).

The Regions should refer communities to LGEAN for the detailed technical information on federal regulations and pollution prevention practices at www.lgean.org, or call toll free at 1-877-TO LGEAN. The LGEAN website, for example, contains several links to other sites that have an explanation of CSO requirements as well as the full text of the CSO Control Policy. The Regions can utilize the above tools either through onsite visits or other outreach mechanisms such as telephone calls.

IV. Sanitary Sewer Overflows

A. Background

Similar to CSOs, SSOs of raw or diluted sewage from the collection system can cause significant public health and environmental problems. The term “SSO(s)” as used in this strategy includes overflows that reach Waters of the United States as well as those overflows that are indicative of improper operation and maintenance. SSOs not reaching Waters of the United States, such as raw sewage spills to public

parks and backyards, may be violations of standard permit conditions for proper operation and maintenance, and may cause significant threat to public health and the environment.

SSOs typically have high concentrations of bacteria from fecal contamination, pathogens and nutrients, all of which are significant contributors to the impairment of lakes, rivers, and streams. Aside from the pollutant impact on surface waters, sanitary sewer overflows frequently occur in areas that may be frequented by pedestrian traffic and pets, providing a likelihood of direct contact with pathogenic bacteria and viruses in the wastewater, and posing a significant public health risk.

There are approximately 3,700 POTWs classified as major facilities under the Agency's definition. Recent informal studies of municipalities have shown that as many as one third of sanitary sewer systems have problems associated with SSOs from the collection system. The Agency believes that strong compliance monitoring, compliance assistance, and enforcement applied nationwide are necessary to protect public health and the environment from these raw sewage overflows.

As part of the Agency's continuing policy to ensure national consistency in addressing SSOs, and to reemphasize the threat SSOs pose to public health and the environment, the Agency issued a joint OECA/OW memorandum on "Enforcement Efforts Addressing Sanitary Sewer Overflows" (March 7, 1995) calling for continued SSO enforcement. As a follow-up to this memorandum, OECA issued the Chapter X "Enforcement Management System Guidance on Setting Priorities for Addressing Discharges from Sanitary Sewers" (EMS Guidance - Chapter X, March 7, 1996) dealing with discharges from sanitary sewers. This chapter provides a method for setting priorities to address discharges of untreated sewage from separate sanitary sewer collection systems prior to the headworks of a sewage treatment plant. Chapter X includes an Enforcement Response Guide specifically tailored to these types of discharge violations.

B. Elements of Regional SSO Response Plan

1. Development of SSO Inventory

The MOA guidance for FY 2000/2001 includes language on SSOs, directing the Regions to develop an inventory of SSO violations and address, as a goal, 20% of the priority systems with SSO violations each year according to the guidance included in Chapter X of the EMS. (Specific percentages are negotiated individually with each Region through the MOA approval process.)

The SSO response plan should describe the process and criteria that the Region and NPDES States will use to identify SSO violations. An initial SSO inventory should be completed by July 28, 2000. This initial SSO inventory should be based on the best available information that the Region has at the time of development. The inventory should be updated as new information on SSO violations becomes available. For MOA purposes, the Regions should use the inventory as it exists on October 1 of each fiscal year, or as of the July 28, 2000 submission for the first year.

For inventory development, the Regions should use every tool available to identify SSO violations. The inventory should include the permittee's name, permit number, extent of SSOs, and any available information on threats to public health and the environment. The Regions could develop and update the SSO inventory on information obtained during inspections or reported through permit requirements. The Regions could also issue Section 308 Information Requests to major municipal facilities that are on the Exceptions List or on the significant noncompliance (SNC) list, or to other POTWs that are either suspect, or known to be experiencing SSOs. In addition, the Regions could use Section 308 Information Requests to follow up on citizen complaints for SSOs. The Regions should also evaluate any ongoing municipal enforcement actions to ensure that any SSO problems are addressed as part of the resolution of the actions.

Municipal inspections can be an effective tool for documenting SSO violations. The Office of Compliance and Region IV are developing an inspection guidance document which includes a checklist and an inspection report writing template that will assist inspectors in evaluating sanitary sewer collection systems for adequate hydraulic capacity, and on

ensuring there is proper management, operation, and maintenance of the system. The inspection guidance document will be available in the third quarter of FY 2000, with the checklist and report writing template to follow shortly thereafter.

2. Priorities for SSO Enforcement Response

The Office of Regulatory Enforcement, Water Enforcement Division (ORE/WED) will continue to work with the Regions and NPDES States in their application of the EMS Chapter X SSO Enforcement Response Guide to address SSO problems at major POTWs. Success in this effort will depend in part on ensuring that POTWs have adequate hydraulic capacity, as well as an effective program for management, operation and maintenance of the sanitary sewer systems they own or over which they have operational control. The Regions should be mindful that under the 2000/2001 MOA guidance, Regions should identify the universe of SSO discharge violations and ensure that 20% (or the percentage negotiated individually with each Region through the MOA approval process) of the priority systems will be addressed each year, consistent with the Chapter X EMS guidance. Special emphasis should be placed on SSOs in priority watersheds or in areas where the receiving waters are impaired (e.g. shellfish bed closures, beach closures, fish advisories, or drinking water sources), and/or in environmental justice areas, as well as other sensitive areas as provided for in the CWAP and the MOA wet weather priorities.

The Regions and NPDES States should use the full range of regulatory response options (informal, formal, or some combination thereof) to ensure that the appropriate remedy is undertaken by the permittee or municipality to correct all SSO problems, as outlined in the Chapter X SSO Enforcement Response Guide. Municipal self-audits similar to the ones now being conducted in Region IV may also prove to be a valuable tool in addressing SSOs. Civil judicial actions should be used, when appropriate, resulting in a Consent Decree with an enforceable schedule and milestones to ensure expeditious progress toward compliance.

3. Small Community Outreach and Technical Assistance

For small communities, the Regions should use a combination of public outreach and onsite technical assistance to identify and address SSO related municipal deficiencies. This compliance assistance approach to small communities should be altered to include enforcement if warranted by the public health or environmental risk presented by the condition(s).

As with CSOs, the Regions can provide outreach to small communities by providing information through LGEAN at www.lgean.org. The Regions should encourage small communities to use LGEAN to receive technical and compliance assistance. The Regions should work with The Office of Compliance on issues relating to compliance and technical assistance.

V. FY 2000/2001 MOA, CWAP Reporting, and Case Conclusion Data Sheets for CSOs and SSOs

As stated above, CSOs and SSOs are priorities for both the FY 2000/2001 MOA and CWAP. Both the MOA and the CWAP require reporting of compliance monitoring and assistance, and enforcement activities. The MOA mid-year and end-of-year reports will be used as the primary mechanisms for reporting these activities. The Regions should be aware that the attached measures are required for the FY 2000/2001 MOA wet weather priorities. These measures will also satisfy reporting for the CWAP.

The Regions may make use of the *Regional Compliance Assistance Tracking System* (RCATS), which is a computer database for tracking and reporting information on compliance assistance activities. Every Region has a RCATS contact who may be identified by contacting the Office of Compliance. The Office of Compliance will track and monitor all compliance assistance and monitoring activities relating to CSOs and SSOs.

The Agency is committed to achieving the goals of the Government Performance and Results Act by fostering demonstration of the environmental results of our environmental programs. This CSO and SSO Enforcement Strategy can support this objective by ensuring that our enforcement

actions promote the collection of data and information that supports the demonstration of environmental results. OECA encourages language in administrative orders, consent orders, and other mechanisms that will foster demonstration by the permittee that the actions taken have achieved environmental results.

OECA is also committed to the documentation of environmental results through use of the Case Conclusion Data Sheets. The Regions should complete the data sheets for all enforcement
actions taken under this strategy. OECA welcomes any suggestions on how to improve these data sheets and make them less burdensome and as nationally consistent as possible.

VI. Headquarters Contacts

The ORE/WED staff assigned to this effort are:

CSO Legal Contact:	CSO Technical Contact:
Alan Morrissey	Atal Eralp
U.S. EPA (2243-A)	U.S. EPA (2243-A)
401 M Street, SW	401 M Street, SW
Washington, D.C. 20460	Washington, D.C. 20460
202-564-4026	202-564-4056

SSO Legal Contact:	SSO Technical Contact:
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202-564-4026	202-564-4027

The OC/CCSMD staff assigned to this effort for CSO and SSO compliance monitoring and assistance are:

John Dombrowski	Michelle Angelich
U.S. EPA (2224-A)	U.S. EPA (2224-A)
401 M Street, SW	401 M Street, SW
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VII. Executive Order 13132

Executive Order 13132, entitled "Federalism" (64 FR 43255, August 10, 1999), requires EPA to develop an accountable process to ensure "meaningful and timely input by State and local officials in the development of regulatory policies that have federalism implications." "Policies that have federalism implications" are defined in the Executive Order to include regulations and regulatory policies that have "substantial direct effects on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government."

This compliance and enforcement strategy does not have federalism implications. It will not have a substantial direct effect on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government, as specified in Executive Order 13132. This strategy applies only to federal agencies, not to the States. The strategy describes how federal agencies should implement and enforce Clean Water Act requirements applicable to combined sewer overflows and sanitary sewer overflows. While both EPA and the States implement and enforce the CWA, this strategy only addresses federal activities. Thus, the requirements of the Executive Order do not apply to this compliance and enforcement strategy.

FY 2000/2001 MOA PRIORITY MEASURES
by Sector or Priority

Revised 6/11/99

Wet Weather	Out-come	Out-put	Existing w/ Modification	
Pounds of pollutants reduced as a result of enforcement for SSOs, CSOs, Stormwater, CAFOs	**X**		**X (CCDS)**	
Number of facilities that undertake CCDS compliance actions (for each CCDS category) as a result of enforcement actions against CAFOs	**X**		**X (CCDS)**	
Compliance status of CSO systems with CSO Control Policy	**X**			**X (manual)**
Stormwater: Number /percent of facilities with individual or general Stormwater permits; CAFOs: Number/percent with NPDES permits	**X**		**X (PCS)**	
Number of inspections targeted to identify SSOs		**X**		**X (manual)**
Percent of Inspections in Priority Watersheds: CSOs, SSOs, CAFOs; % targeted inspections for SSOs in priority watersheds		**X**	**X (PCS)**	
Number of enforcement actions: for CSOs, for SSOs, for Stormwater, for CAFOs.		**X**	**X (Docket)**	
Percent of enforcement actions in priority watersheds for CSOs, for SSOs, for CAFOs, and for stormwater		**X**	**X(PCS)**	
Number of State Compliance and Enforcement Strategies developed for CAFOs		**X**		**X (manual)**
Existing Measures (No new reporting or data modification): No. of Inspections Conducted: CSOs, Stormwater, CAFOs, SSOs; No. of facilities reached through compliance assistance;				