

June 21, 1996

**DRAFT ACTION PLAN  
for the  
SSO ADVISORY SUBCOMMITTEE**

**FAC MEETINGS**

- ! July 8 and 9, 1996
- ! September 9 and 10, 1996
- ! October 21 and 22, 1996 (if needed)
- ! After October 1996, SSO FAC will be given opportunity to comment on key products at critical junctures. Additional meeting can be scheduled if appropriate.

**PROGRAMMATIC PRODUCTS (FAC has opportunity to make recommendations and/or help develop)**

EPA currently suggests the following:

- 1) Enforcement Guidance - Addition to Enforcement Management System: Setting Priorities for Addressing Discharges from Separate Sanitary Sewers (Issued March 7, 1996).
- 2) Regulation modifications - Revisions to two existing regulatory provisions that establish requirements in permits:
  - A) Non-compliance reporting requirements at 40 CFR 122.41(l)(6).
  - B) Addition of SSO prohibition and collection system defense to permit requirements at 40 CFR 122.41.

Guidance explaining how existing upset/bypass and non-compliance reporting requirements apply to SSOs will be issued prior to the regulatory modification.
- 3) Comprehensive Guidance/Policy - Comprehensive guidance on implementation of SSO flow chart and associated issues. (Need to define issues to be addressed and format)

## PRODUCT MILESTONES

- 1) October 1995 - Preliminary consensus on concepts of flow chart - additional discussion to be provided in the context of issue papers.
- 2) May 1996 - Discussion of proposed areas of agreement or identification of recommended alternatives for:
  - A) Minimum operational, reporting and public notification requirements
  - B) Reporting
  - C) Public Notification
- 3) June 1996
  - ! Intermim draft of Minimum Measures paper (which combines three papers discussed at May meeting) and associated comments identifying outstanding issues.
- 4) July 9, 1996
  - ! Preliminary agreement on proposed areas of agreement or identification of recommended alternatives for:
    - D) Public Health framework
    - E) Remediation of SSOs
    - F) Customer municipalities
    - G) Role of NPDES permits
    - H) Role of States
- 5) EPA to develop draft policy memorandum explaining how existing non-compliance reporting and bypass/upset regulations apply to SSOs along with a draft notice of proposed rulemaking addressing these issues after reviewing May 24 comments from FAC. EPA will begin internal review of the draft packages.
- 6) September/October 1996
  - ! Subcommittee consensus on areas of agreement
  - ! Discussion/adoption of recommendations from UWW FAC on:
    - I) Watershed approach (recommendation from UWW FAC)
    - J) Water quality standard issues (recommendation from UWW FAC)
    - K) Environmental monitoring (recommendation from UWW FAC)
  - ! Draft language for modifying reporting regulations
  - ! Draft language for modifying collection system defense regulations
  - ! Draft comprehensive guidance
- 7) November 1996 - Begin Internal EPA review of regulation modifications and guidance
- 8) January 1997 - Subcommittee review of draft regulation modifications and draft guidance.
- 9) March 1997 - Begin OMB review of regulation modifications and guidance
- 10) July 1997 - Public comments of regulation modifications and guidance

## **MAJOR PROJECTS SUPPORTING FAC EFFORT**

(Projected completion date in parenthesis)

- 1) Environmental/Health studies
  - ! SSO Health Risks and water quality impacts report (by CERI - Summer 1998)
  
- 2) Technical guidance
  - ! Evaluation of case studies (completed Fall, 1995).
  - ! Revisions to WEF MOP #7 (Fall, 1997)
  - ! Description of Privately-owned service connection programs (WEF - Spring, 1997)
  - ! Development of protocols for assessing in-stream impacts of wet weather events and SSO/CSO control performance (by WERF - Spring 1997)
  - ! Guidance on evaluating sewer O&M programs (CA State - Fall 1997)
  - ! Optimizing sewer O&M frequencies (ASCE - Fall 1997)
  - ! Evaluation of the use of NPDES requirements for collection systems (MD - (Fall 1996)
  
- 3) Outreach Materials
  - ! Brochure - (Spring 1996)
  - ! Community based outreach program guidance (CERI - Summer 1997)
  - ! Outreach materials (WEF - Spring 1997)
  - ! Technical publications list (completed 1996)
  
- 4) Training
  - ! Training video (CA State - Spring 1997)
  - ! Training program by key stakeholders such as WEF, APWA, AMSA (begin 1997)
  - ! National Conference on Results of Projects Above (Spring 1998)
  
- 5) ASIWPCA Survey Results - ASIWPCA is conducting a survey of States to provide information on State SSO efforts. Preliminary information provided at May, 1996, SSO FAC meeting. Report target date - Summer of 1996.
  
- 6) Cost-benefit analysis on SSOs - Initial draft Fall, 1996. Revisions expected to reflect guidance development and other information needs.