

US EPA ARCHIVE DOCUMENT

Theater of the Urban Wet Weather Water Quality Standards Impasse
The CSO Partnership and Limno-Tech, Inc.
Adrienne Nemura

This highly entertaining session will take a serious look at the challenges facing urban communities, EPA, and state agencies as they struggle to comply with the Clean Water Act and municipal budget realities. This skit will demonstrate real-life discussions about why Use Attainability Analyses (UAAs) are not typically included with combined sewer overflow (CSO) long-term control plans (LTCPs), and propose possible routes that EPA could take in “breaking the impasse.”

As reported recently in EPA’s Report to Congress on the Implementation and Enforcement of the CSO Control Policy (December 2001), less than one half of the LTCPs submitted have been approved, largely because the plans cannot demonstrate that water quality standards (WQS) can be met with cost-effective controls. This is particularly true for bacteria and recreational uses. Furthermore, most cities find that complete sewer separation, while providing the possibility of relief from narrative WQS for bacteria, exacerbates their stormwater management problems and still doesn’t result in WQS being met. Meanwhile, discussions about the actual recreational uses languish since none of the players want to be perceived as “downgrading” uses.

This session will provide a lively discussion between three role-players as they explore these issues and identify what can be done to break this impasse. The City Engineer has just submitted the LTCP after years of study and months of persuading the Sanitary Board and City Council to approve the LTCP. The Permit Writer wants to approve the LTCP but can’t, since it doesn’t lead to compliance with existing WQS, even though he agrees that the LTCP is technically sound, cost-effective, and conforms to the CSO Policy. The representative from the WQS authority is just now hearing of the city’s approach and is struggling to identify possible solutions.

This session will provide the audience with a global perspective on the absence of a clear process for integrating UAAs with LTCPs and other urban wet weather problems. In addition, the role-players will address the factors typically used to determine existing uses, particularly recreational uses, the practical effects of high flows and nonpoint source impacts, and what methods CSO communities are using to address socioeconomic assessments of designated use impacts.