

Future of Enforcement

U.S. EPA CSO and SSO Compliance and Enforcement Priorities (FY 2008 – 2010)

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Wet Weather Priorities

- Combined Sewer Overflows (CSOs)
- Sanitary Sewer Overflows (SSOs)
- Stormwater
- Concentrated Animal Feeding Operations (CAFOs).

– Detailed strategy summaries located at:
<http://www.epa.gov/compliance/data/planning/priorities/cwa.html>

CSO Strategy...



- Primary focus is ensuring appropriate progress towards addressing CWA CSO violations.
- Recognizes that smaller CSO communities in non-compliance may also need to be addressed.

SSO Strategy...



- Primary focus is to ensure large and medium systems continue progress towards eliminating SSOs.
- EPA will work with the states to address smaller municipal sewer systems.

Recent Developments

Federal Legislation

S.2080 and H.R. 2452 would require reporting Basement backups caused by the municipality, as well as spills/overflows that do not reach waters of the U.S.

Recent Developments

ECOS Resolution

September 2008 ECOS resolution urges Congress to amend the CWA to include a provision requiring reporting of sewage spills and overflows.

National Consistency

- Federal legislation and the ECOS resolution would improve National consistency in addressing CSOs and SSOs.
- EPA shares goal of National consistency and supports uniform reporting of CSOs and SSOs.

Financial Capability

- EPA is sensitive to financial issues in the current economic climate.
- Given the current financial situation, EPA would consider a change in circumstances (i.e., bankruptcy or other significant financial hardship) in implementing CDs.

The Goal Clean Water

- CSOs and SSOs continue to be an EPA National Enforcement Priority until wastewater systems warranting Federal attention are in compliance with the Clean Water Act.

The Goal Clean Water

- If your system is not in compliance today, EPA will be taking a look.
- Not just focusing on large systems anymore - looking at medium and small systems as well.