


Sanitary Sewer Overflow Initiative


What is a Sanitary Sewer Overflow (SSO)

- A type of unauthorized discharge of untreated or partially treated wastewater from the collection system or it's associated components.



What Is The SSO Initiative?

- Reduce the number of SSOs
- Address SSOs before human health and safety and/or the environment are impacted
- Address SSOs before they become enforcement issues



What Is The SSO Initiative?




Who Can Participate?

- Municipal Wastewater Treatment facilities with Sanitary Sewer Systems
- Municipal Sanitary Sewer Systems (Subscriber Systems)
- Facility can call the TCEQ office and ask to participate
- Facility can wait for an inspection and then ask to participate



What Inspectors Look For

- Daily Average or 2 Hour Peak Flow Violations
- Significant noncompliance with other effluent limitations that might be related to hydraulic loading
- SSO History (number and volume)
- Previous Notice of Violations for SSOs
- SSOs in impaired watersheds
- SSOs with potential to impact human health, safety, or environment
- Repeated complaints regarding SSOs
- Facilities already under an informal compliance plan with the Regional Office, and the corrective action will take longer than 6 months



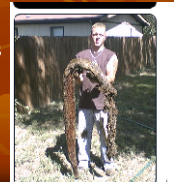
How Will Participation Benefit My Facility?

- Prevents enforcement for most continuing SSOs, as long as the SSOs are being addressed by the plan and the plan is being followed
- Allows facility to spend money on the SSO problem instead of penalties
- Ensures the SSOs addressed by the SSO Plan will not affect compliance history rating



What to Expect

- Meeting with the Regional Staff within 30 days of the investigation to discuss the initiative
- Discuss that the facility will have to agree to conduct a sanitary sewer system evaluation
- Discuss the required elements of the SSO Plan
- Agree to submit an SSO Plan that meets these required elements
- Receive technical assistance materials from the Small Business and Environmental Assistance Division



What Happens If We Don't Participate



What If We Don't Participate?

- An Notice of Violation will be issued if SSOs were noted in the current investigation and were not noted in the previous investigation
- An Notice of Enforcement will be issued if the SSOs were documented in the previous inspection
- If the facility contacts the Regional office, without an investigation, then the SSO will be evaluated at the next investigation

What if We Do Participate?

- Fill out a notice of Intent to Participate in the SSOI
- 180 days to submit the final SSO plan
- The Regional Office will review the final SSO plan, and will allow 30 days if a revised SSO plan is needed
- The final SSO plan will be forwarded to the Enforcement Division for inclusion in the SSO agreement.

What Should Be Included In The SSO Plan

- Cause of SSOs and interim measures that will be taken to mitigate effects of continuing SSOs
- Comprehensive evaluation of the sewer system (partial or entire)
- Description of Corrective Measures to address SSOs, with milestones
- Time line for completing each milestone
- Development or Improvement of the O&M Program to ensure continued compliance
- Description of sources for funding
- Provisions for evaluating effectiveness of improvements



Where Can I Get Assistance For Developing A Plan

- Small Business and Environmental Assistance Division – (512)239-3100 or (800)447-2827
e-mail – sbap@tceq.texas.gov

Information on funding sources
Guidance for a Fats, Oil, and Grease Management Program (FOG)
Guidance for a Capacity, Management, Operation and Maintenance Program (CMOM)



What Happens If Additional SSOs Occur?



What Happens If Additional SSOs Occur While I'm Participating?

- Participation excludes the facility from formal enforcement for SSOs that are addressed by the plan unless;

the SSO results in a documented impact to human health, safety or the environment
SSOs are intentional or the result of negligence
the facility fails to respond to the SSO appropriately
the facility fails to report an SSO
the facility fails to meet the requirements of the SSO agreement

What Happens If Additional SSOs Occur While I'm Participating?

- Should the above occur, that event will be reviewed individually to determine if continued participation in the initiative is appropriate
- Formal enforcement may be initiated for the particular SSOs that meet the above requirements

What If My Facility Chooses Not To Participate?

- Participation is entirely voluntary
- An NOV or NOE will be issued
- There will be no protection from formal enforcement for continuing SSO violations



What If My Facility Chooses Not To Participate?



What If My Facility Chooses Not To Participate?



Can My Facility Be Dropped From The Initiative?

- Yes, if a facility fails to respond appropriately with any required time schedules without a prior approved variance



What about Facilities That Don't Report SSOs that are occurring?

- They will not be allowed to participate in the initiative
- They will be monitored through new "Focused Investigations" for SSOs and Inflow/Infiltration
- If it is determined that SSOs or flow violations are occurring and not being reported, NOV's or NOEs will be issued



SSO Reduction – Just Bottle It!



SSO Reduction Guidance and Other Documents

- Benefits of Protecting Your Community from SSOs – www.epa.gov/npdes/pubs/ssoenweb.pdf
- CMOM Program Self-Assessment Checklist www.epa.gov/npdes/pubs/cmomselfreview.pdf
- EPA Sanitary Sewer Overflow http://cfpub.epa.gov/npdes/home.cfm?program_id+4
- Water Environment Federation CMOM www.cmom.net



SSO Reduction Guidance and Other Documents

- Small Business and Environmental Assistance <http://www.tceq.texas.gov/assistance/small-business-assistance>
- Galveston County Health Department – Illicit Discharges - <http://www.h-gac.com/community/water/tmdl/big/illicit-discharges.aspx>
- City of Dallas - http://www.dallascityhall.com/dwu/pretreatment/grease_abatement.html

SSO Reduction Guidance and Other Documents

- American Society of Civil Engineers Reports
Optimization of Collection System
Maintenance Frequencies & System
Performance Protocols for Identifying
SSOs
SSO Solutions

http://cfpub.epa.gov/npdes/sso/toolbox.cfm?program_id=4 Technical & Issue Papers



SSO Reduction Guidance and Other Documents

- American Public Works Association Preparing Sewer Overflow Response Plans: A Guide For Local Governments www.pubworks.org/catalog (water resources link)
- City of Houston FOG - http://www.publicworks.houston.gov/fof/fof_grease.html
- City of Austin Pretreatment SSO & FOG www.ci.austin.tx.us/water/wwwssd_jw_sso.htm

