

# THE FACTS . . .

## EPA's Proposed Blending Policy



**FICTION:** Blending is harmful to human health.

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Blending is used to protect public health. Blending provides municipal public servants a mechanism to ensure that peak storm flows receive the maximum treatment possible. Treatment plants also *disinfect the wastewater to kill harmful pathogens before the treated wastewater is discharged in order to protect the nation's waterways*. The alternative to blending is a raw sewage discharge *without any treatment*. EPA's proposed policy furthers public health.

**FICTION:** Many people are exposed to blended wastewater that is discharged into the nation's waters. People will be "swimming in sewage".

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The nation's municipal public servants use blending for short-term discharges during periods of heavy rain or snowmelt, precisely when, and in locations where, people *are not* swimming or recreating. Therefore, *people are not being exposed to blended effluent*. Furthermore, blended effluent must *fully meet Clean Water Act permit requirements* — this means that the most stringent federal and state-mandated water quality standards are being met.

**FICTION:** EPA is "rolling back" an environmental safeguard.

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This is a purposeful mischaracterization. Blending has been an EPA-approved practice for more than 30 years. This policy clears up confusion resulting from inconsistent approaches to blending across the country. EPA's proposal clarifies how permitting authorities should assess blending at public wastewater treatment utilities and captures the "best practices" in use by state agencies and public treatment utilities today.

**FICTION:** EPA's proposal "relaxes restrictions" on discharging inadequately treated sewage into waterways during rain events.

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EPA's proposal *DOES NOT change any regulations*. In fact, EPA's proposed blending guidance clearly outlines additional considerations that permitting authorities must use to assess utilities that blend. Significantly, *utilities that blend must, at all times, meet EPA's current technology-based "secondary treatment" standard and any additional water quality-based requirements*.

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# THE FACTS . . .

## EPA's Proposed Blending Policy



**FICTION:** Allowing polluters to discharge inadequately treated sewage into our nation's waters will have adverse, long-term environmental consequences.

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Blending is a water quality safeguard. Without blending to protect the treatment plant's biological/secondary treatment units from "washing out" (effectively shutting the plant down), municipalities would be forced to send untreated wastewater into the nation's waterways. A prohibition on blending would also lead to an increase in sewage backups into people's homes. *As such, prohibiting blending would lead to immediate and adverse water quality and public health impacts.*

**FICTION:** It is simple for municipalities to add treatment or storage capacity to ensure secondary treatment of all peak excess flow water.

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Unfortunately, this solution is not simple at all. Building huge secondary treatment units or storage facilities is often prohibitively costly and/or infeasible. Biological/secondary treatment units, which rely on living organisms, cannot simply be turned on and off to accept peak flows. Similarly, building additional storage facilities often requires the purchase of real estate that is either unavailable or too costly. AMSA estimates that a national blending prohibition would cost municipalities approximately \$200 billion — a huge sum given the fact that blending already protects the public health and the environment.



AMSA represents the interests of the nation's wastewater treatment agencies. AMSA members are true environmental practitioners that serve the majority of the sewered population in the United States and collectively treat and reclaim more than 18 billion gallons of wastewater each day. AMSA maintains a key role in the development of environmental legislation, and works closely with federal regulatory agencies in the implementation of sound environmental programs.