

To: CSO Members
From: National Office
Date: April 18, 2001
Subject: AMSA CSO SURVEY

Action Please By: May 7, 2001

The U.S. Environmental Protection Agency (EPA) is required to submit by September 2001 a Report to Congress on the progress made in implementing the *National CSO Control Policy*. EPA has requested assistance from AMSA in the form of data on the status of CSO Policy implementation, noteworthy achievements, and impediments to progress. In response to this request, the National Office agreed to conduct a survey of its CSO members. The enclosed *AMSA CSO Survey Form* was developed by the National Office, with input from members of an ad-hoc CSO Working Group. ***Please review and complete the enclosed survey form, and return it to AMSA by Monday, May 7.***

The Report to Congress presents the membership with an opportunity to demonstrate where progress has been made and to highlight areas of particular concern. To the extent possible, AMSA will tabulate data to exhibit status and trends. We appreciate your time and contribution to this effort.

Please use the following instructions as a guide to completing the enclosed form:

1. ***Where to send forms:*** Complete the survey form and return to AMSA c/o Greg Schaner by ***Monday, May 7***. Completed forms can be faxed to 202/833-4657 or emailed to *gschaner@amsa-cleanwater.org*.
2. ***Questions:*** Feel free to call Greg with any questions regarding the survey at 202/296-9836.
3. ***If you have additional information:*** Include narrative explanations wherever you believe that the “yes” or “no” response does not sufficiently explain your situation. Feel free to attach separate sheets, or to add text after the question if you are accessing this form electronically.
4. ***Suggested performance measures:*** AMSA suggested the use of a number of CSO performance measures to track progress in its 1996 report, *Performance Measures for the National CSO Program*. For your reference in answering # 27 on the survey form, the recommended measures are included as an attachment. A web link to a .pdf version of the report has also been added: *http://www.amsa-cleanwater.org/temp/96pmeasures.pdf* You can either click on the link or cut-and-paste into your web browser to access this file.
5. ***Private information:*** Please indicate if there is any specific information relating to your CSO program which you would like to remain private and confidential. Information submitted to EPA on program status, particularly questions # 1 - 8 will be presented cumulatively, and will not identify specific facilities.

Thank you again for your assistance.

ENCLOSURE

AMSA CSO Survey Form

Contact Information		
Name: Agency: Phone/Fax/email:		
<u>Program Status</u>		
<p>1. Have you fully implemented the Nine Minimum Controls that were part of EPA's <i>National CSO Control Policy</i>, or the equivalent minimum measures required in your state? If you answered "no", please check those measures that have been completed (see below).</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proper operation and regular maintenance programs <input type="checkbox"/> Maximum use of the collection system for storage <input type="checkbox"/> Modify pretreatment requirements to minimize CSO impacts <input type="checkbox"/> Maximization of flow to POTW for treatment <input type="checkbox"/> Prohibition of CSOs during dry weather <input type="checkbox"/> Control of solid and floatable materials in CSOs <input type="checkbox"/> Pollution prevention <input type="checkbox"/> Public notification of CSO occurrences and CSO impacts <input type="checkbox"/> CSO Monitoring to characterize CSO impacts/controls 	9 Yes	9 No
2. If you have not implemented all nine minimum controls, what are the primary reasons? To the extent possible, please highlight cost, affordability, legal, or administrative issues.		
3. Have you developed a Long Term Control Plan (LTCP)?	9 Yes	9 No
4. Has your LTCP been approved?	9 Yes	9 No
5. If you answered "no" to # 4, please provide some background on the primary reasons why the LTCP has not yet been approved?		
6. Is your LTCP based on EPA's "presumption approach" or "demonstration approach"?		
<ul style="list-style-type: none"> <input type="checkbox"/> Presumption approach <input type="checkbox"/> Demonstration approach <input type="checkbox"/> Neither 		
7. To what extent have you implemented your LTCP? _____ %		
8. What are the primary reasons for not fully implementing your LTCP? To the extent possible, please highlight cost, affordability, legal, or administrative issues.		

<u>Cost / Affordability Issues</u>					
9.	<p>What are the estimated capital and O & M costs for your LTCP when fully implemented? What is the estimated capital and O & M costs of your implemented nine minimum controls (NMCs)?</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">LTCP Capital:</td> <td style="width: 50%;">NMC Capital:</td> </tr> <tr> <td>LTCP O & M:</td> <td>NMC O & M:</td> </tr> </table>	LTCP Capital:	NMC Capital:	LTCP O & M:	NMC O & M:
LTCP Capital:	NMC Capital:				
LTCP O & M:	NMC O & M:				
10.	<p>What is your estimate of the amount invested to date on implementing the LTCP? What is your estimate of the amount invested to date on your implemented nine minimum controls (NMCs)?</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">LTCP Capital:</td> <td style="width: 50%;">NMC Capital:</td> </tr> <tr> <td>NMC O & M:</td> <td>NMC Capital:</td> </tr> </table>	LTCP Capital:	NMC Capital:	NMC O & M:	NMC Capital:
LTCP Capital:	NMC Capital:				
NMC O & M:	NMC Capital:				
11.	Over what time period will your investment in the LTCP occur?				
12.	What percentage of your capital improvement plan budget (CIP) is dedicated to your LTCP? _____ %				
13.	<p>What is the ratio of your community's current annual median household income to your current average annual sewer service rates (if known)? (Note: EPA considers 2% as the cutoff for affordability.)</p> <p>Worksheet for current rates/income:</p> <ol style="list-style-type: none"> a. Average annual sewer rates = b. Annual medium income = c. "a" ÷ "b" = 				
14.	<p>What is the ratio of your community's annual median household income to your projected future average annual sewer service rates after full implementation of your LTCP (if known)?</p> <p>Worksheet for rates/income following LTCP implementation:</p> <ol style="list-style-type: none"> a. Average annual sewer rates = b. Annual medium income = c. "a" ÷ "b" = 				
15.	If you are funding your LTCP through alternative mechanisms (i.e., other than sewer rates), please describe:				

<u>Compliance with State Water Quality Standards</u>		
16. When your LTCP has been fully implemented, will water quality standards be attained?	9 Yes	9 No
17. If you answered “no” to # 16, will remaining exceedances be attributed to CSOs?	9 Yes	9 No
18. If you answered “no” to # 17, will remaining exceedances be attributed to other sources?	9 Yes	9 No
19. If you answered “yes” to # 18, please specify which sources will cause continued exceedances and their relative contribution if known.		
20. If you answered “no” to # 17, is your state reviewing and/or revising the applicable water quality standards to account for wet weather conditions?	9 Yes	9 No
21. If you answered “yes” to # 20, please provide brief description of the revised standard or the options being explored?		
22. If continuing water quality standards exceedances are expected after implementation of your CSO LTCP, what other programs are under way that will address those problems?		
<u>Performance Measurement / Monitoring</u>		
23. Have you reduced CSOs in your system since 1994?	9 Yes	9 No
24. If you answered “yes” to # 23, please specify: Percentage reduction in frequency: Percentage reduction in volume:		
25. If you answered “yes” to #23, please specify which control measures resulted in the greatest reduction?		

26. What accomplishments did your CSO control program make prior to 1994?
27. To the extent you have tracked other anecdotal improvements resulting from your CSO control program, please specify below. For reference to suggested performance measures, see the attached January 1996 AMSA document, <i>Performance Measures for the National CSO Control Program</i> , or access the document via the web at http://www.amsa-cleanwater.org/temp/96pmeasures.pdf

Please fax the completed form to Greg Schaner by **Monday, May 7** at 202/833-4657 or by email (gschaner@amsa-cleanwater.org). If you have any questions about the survey form, please feel free to call Greg at 202/296-9836 or contact him by email