TCEQ Sanitary Sewer Overflow Initiative Program

Presented by Lynley Doyen, Wastewater & CAFO Program Liaison
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What Is the SSO Initiative?

- Proactive approach to:
  - address an increase in SSOs due to aging systems; and
  - encourage corrective action before human health, safety or the environment are impacted.

- Participation is voluntary

- Initiated in 2004
What are the Benefits of Participating?

- Offers protection from enforcement action by TCEQ for continuing SSOs covered under the SSO Agreement
- Compliance history rating is not affected
- No penalties associated with the SSO Agreement
How many Facilities are Participating?

- Over 200 facilities have been invited
- Approximately 111 Agreements have been issued
- Approximately 21 facilities participating in the Houston-Galveston area
Number of Reported SSOs and Effective Agreements (by fiscal year)

<table>
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<tr>
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<th>FY04</th>
<th>FY05</th>
<th>FY06</th>
<th>FY07</th>
<th>FY08</th>
<th>FY09</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reported SSOs</td>
<td>1160</td>
<td>1472</td>
<td>1911</td>
<td>2854</td>
<td>2478</td>
<td>1227</td>
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<tr>
<td>SSOI Agreements in Effect</td>
<td>0</td>
<td>1</td>
<td>6</td>
<td>25</td>
<td>75</td>
<td>92</td>
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How Does it Work?

Step 1: Identification of Facilities

- Invitation by the Region
  - On-site investigations
  - Record reviews
- At the request of the facility
How Does it Work?

Step 2: Meet with the Regional Office

- Discuss investigation findings
- Explain the SSO Initiative
- Discuss elements of the SSO Plan
- Provide educational materials on the SSO Initiative
How Does it Work?

Step 3: Confirmation of Participation

- If interested, you will receive a letter that confirms participation.
- Within 30 days, submit a written plan for completing an evaluation of the system and corrective actions.
- Allowed up to 180 days to finalize your SSO Plan.
How Does it Work?

Step 4: Evaluation of the SSO Plan

- SSO Plan is reviewed by the Region
- If additional information is required, you will receive a letter, noting the deficiencies
- If approved, you will receive a letter notifying you that your plan has been approved
How Does it Work?

Step 5: Finalizing the Agreement

- SSO Plan is forwarded to the Enforcement Division

- The Enforcement Division
  - Has the final approval on SSO Plans
  - Drafts the Agreements
  - Tracks the status of compliance
What Do I Have to Do?

- Conduct a comprehensive Sanitary Sewer Evaluation Survey (SSES)
- Develop a plan to address the SSOs
- Agree to sign and comply with the Agreement
Conduct SSES*

- **Goal of the SSES:**
  - To identify location, sources, and rate of excessive infiltration and inflow (I/I); and
  - Determine rehabilitation options and estimated costs to minimize or eliminate the causes of excessive I/I

- Start with an inventory the existing conditions

*Adapted from *Guidelines for Performing Infiltration/Inflow Analyses And Sewer System Evaluation Survey*, Revised January, 1993, Commonwealth Of Massachusetts Department Of Environmental Protection*
Conduct SSES*

- Review information and establish:
  - Number, frequency, and cause of SSOs
  - Type and age of sewer lines and manholes
- Conduct a physical survey of the system
- Conduct a flow data analysis
- Develop a report with the findings of the study and recommended corrective actions
Elements of the SSO Plan

- Description of the cause(s) of the SSOs
- Cannot exceed 10 years
- Interim measures that will be taken to mitigate the effects of continuing SSOs
- Description of the corrective measures (must be specific and measurable)
Elements of the SSO Plan

- Description of the Operations & Maintenance Program
- Time line for completing each corrective measure
- Description of the source(s) for funding
- Statement or provision for evaluating the effectiveness of the SSO Plan
Main Points to Remember

- The SSO Initiative is a proactive approach for addressing SSOs to encourage corrective action before they affect human health/environment.
- Participation is voluntary.
- The Agreement will not affect your compliance history rating.
- Participation allows protection from TCEQ enforcement on routine SSOs.
Main Points to Remember

- Conduct an SSES
- Complete final SSO Plan within 180 days
- Enforcement Division has final approval of the SSO Plan, drafts the Agreement, and tracks compliance with the Agreement
Questions??

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