
12. COMBINED SEWER OVERFLOWS

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Related Websites

Office of Wastewater Management (OWM) Homepage: <http://www.epa.gov/owm>

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12. A. Background and History of the CSO Policy

In addition to materials in this chapter, inspectors must be familiar with Chapter 1 - "Introduction" & Chapter 2 - "Inspection Procedures".

As defined in the CSO Control Policy, a combined sewer system (CSS) is “a wastewater collection system owned by a state or municipality [as defined by Section 502(4) of the Clean Water Act] which conveys sanitary wastewater (domestic, commercial and industrial wastewaters) and storm water through a single-pipe system.” During precipitation events (e.g., rainfall or snowmelt), the volume of sanitary wastewater and storm water runoff entering CSSs often exceeds the capacity of the system to transport the combined wastewaters to the publicly-owned treatment works (POTWs). When this happens, these systems are designed to overflow directly to surface waters. These overflows are combined sewer overflows (CSOs). Some CSOs occur infrequently; others, with every precipitation event. Because CSOs contain raw sewage and contribute pathogens, solids, debris, and toxic pollutants to receiving waters, CSOs can create serious public health and water quality concerns. CSOs have caused or contributed to beach closures, shellfish bed closures, contamination of drinking water supplies, and other environmental and public health problems.

Approximately 772 communities in the U.S. have CSSs that have 9,471 permitted CSO outfalls that are regulated by 859 NPDES permits. CSOs are point sources subject to NPDES permit requirements including the technology-based and water quality-based requirements of the Clean Water Act (CWA). CSOs are not subject to the secondary treatment requirements that are applicable to POTWs., but are subject to BAT/BCT requirements based upon a BPJ case by case determination.

EPA's 1994 CSO Control Policy (59 FR 18688, April 19, 1994) “represents a comprehensive national strategy to ensure that municipalities, permitting authorities, water quality standards authorities and the public engage in a comprehensive and coordinated effort to achieve cost effective CSO controls that ultimately meet appropriate health and environmental objectives.” Under the Policy, CSO communities were expected, through requirements in their NPDES permit or in another enforceable mechanism, to:

- Implement nine minimum controls (NMC) that may be considered minimum BAT/BCT, based on the permitting authority. These NMC are measures that can reduce CSOs and their water quality impacts without significant engineering studies or major construction. CSO communities were expected to implement the NMC by January 1, 1997
- Develop a long-term CSO control plan (LTCP) generally within 2 years of NPDES permit issuance or the issuance date of another enforceable mechanism requiring the CSO community to develop a LTCP
- Implement the LTCP. Implementation of the individual CSO controls may be phased based on the relative importance of adverse impacts of the CSOs on water quality standards, priority projects identified in the LTCP, and on the permittee's financial capability

- Implement a post-construction compliance monitoring program.

Permitting and enforcement authorities are expected to take enforcement action against dry weather CSO discharges.

As outlined in the CSO Policy, the nine minimum CSO controls are listed in Table 12-1 and the elements of the LTCP are listed in Table 12-2. The major approach to CSO control, outlined in EPA's CSO Control Policy, is to:

- Eliminate CSOs to sensitive areas wherever possible (where not possible, provide treatment).
- Coordinate the review and revision of water quality standards with development of long-term CSO control plans.
- Evaluate a reasonable range of alternatives that could achieve the necessary level of control/treatment, and select the controls to be implemented based on cost/performance evaluations.
- Develop an implementation schedule based on the relative impacts on WQS and designated uses, on the priority of projects identified in the LTCP, and on the permittee's financial capability.
- Maximize treatment of wet weather flows at the POTW.

Since the CSO Control Policy was published, EPA has released guidance documents on the following six implementation areas: long-term control plans, the nine minimum controls, screening and ranking, funding options, permit writing, and financial capability and schedule development (see the References section and/or the CSO Website (<http://www.epa.gov/npdes/cso>) for more information).

In the Consolidated Appropriations Act for Fiscal Year 2001, P.L. 106-554, Congress amended the Clean Water Act by adding Section 402(q) to require, among other things, that all permits, orders, and decrees issued to control CSOs, after enactment of the Consolidated Appropriations Act, shall conform to EPA's 1994 CSO Control Policy. EPA and State NPDES permitting authorities should refer to Section IV, Expectations for Permitting Authorities, of the Policy. This section of the policy presents the major elements that should be in NPDES permits to implement the Policy and ensure protection of water quality.

State and EPA NPDES permitting authorities continue to work with permittees to incorporate CSO conditions into NPDES permits and through other enforceable mechanisms, such as administrative or judicial orders.

Table 12-1**Nine Minimum CSO Controls**

- Proper operation and regular maintenance programs for the sewer system and the CSOs
- Maximum use of the collection system for storage
- Review and modification of pretreatment requirements to ensure that CSO impacts are minimized
- Maximization of flow to the POTW for treatment
- Prohibition of CSOs during dry weather
- Control of solid and floatable materials in CSOs
- Establishment of pollution prevention programs
- Public notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts
- Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls

Table 12-2**Elements of the Long-Term CSO Control Plan**

- Characterization, monitoring, and modeling of the combined sewer system
- Public participation
- Consideration of sensitive areas
- Evaluation of alternatives
- Cost/performance considerations
- Operational plan
- Maximizing treatment at the existing POTW treatment plant
- Implementation schedule
- Post-construction compliance monitoring program

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12. B. CSO Inspection Procedures

Each municipality's specific CSO requirements will be contained in a NPDES permit, an enforcement order or a consent decree. CSO conditions will be specific to that permittee. However, the inspection of one CSS may involve visits to more than one municipality, depending on the configuration and possible shared responsibility for the system. Before conducting the inspection, the inspector should determine the authorities responsible for operation of the system and define the scope of the inspection. The inspector will obtain information to determine compliance in the following areas:

- CSO prevention during dry weather
- Implementation of the nine minimum CSO controls
- Adherence to a schedule for development, submission, and implementation of a Long-Term CSO Control Plan, including any interim deliverables
- Adherence to schedule for implementation of the CSO controls selected from the LTCP
- Elimination or relocation of overflows from identified sensitive areas, as defined in the approved LTCP
- Narrative, performance-based or numerical, water quality-based effluent limitations
- Monitoring program, including baseline information on frequency, duration, and impacts of CSOs

Preparation

As stated above, the requirements for CSO control will most likely be found in the NPDES permit, or in some cases, in an enforcement order, such as an Administrative Order or Judicial Order, or a Consent Decree. Inspectors should review the permit (and permit amendments) and other enforceable mechanisms (e.g., consent orders) issued to the permittee. The inspector should be aware that in some cases the CSSs and CSO structures (i.e., pump stations) may be permitted separately from the POTW. The inspector may find:

- Requirements to implement and document implementation of technology-based controls (i.e., nine minimum controls) by the date specified in the permit or enforceable mechanism.
- Requirement to submit a report documenting the implementation of the nine minimum controls; the report will usually be required within 2 years of permit issuance.
- Requirements for the development, submission, and implementation of the Long-Term CSO Control Plan. Where the permittee is in the phase of developing a LTCP, there will usually be a schedule for the development and submission of the plan, either in the permit or other appropriate enforceable mechanism. Where the permittee has completed a LTCP, there will be narrative requirements pertaining to the

implementation, operation, and maintenance of the selected CSO controls described in the LTCP. There will also be an implementation schedule for CSO controls either in the permit or in an appropriate enforceable mechanism.

- Water quality-based effluent limits for CSOs. Numeric limits may not be found in the initial permits when the permittee is developing or implementing its LTCP. Instead, there will be a requirement to immediately comply with applicable WQSs expressed in the form of a narrative limitation. Permittees that have completed and are implementing their LTCPs may have one of the following permit conditions for CSOs:
 - A maximum number of overflow events per year for specified design conditions
 - Minimum percentage capture of combined sewage by volume for treatment under specified design conditions
 - Minimum percentage reduction of the mass of pollutants discharged for specified design conditions
 - Other performance-based standards and requirements.
- Requirements to implement a post-construction compliance monitoring program. This will be required for permittees that have completed and are implementing their LTCPs.
- Requirement to re-assess overflows to sensitive areas. This will only be imposed in those cases where elimination or relocation of CSOs from sensitive areas were proven not to be physically possible or economically achievable.
- Conditions establishing requirements for maximizing the treatment of wet weather flows at the treatment plant.

Other documents that the inspector should review are any CSO reports submitted by the permittee. The permittee may have submitted information in response to a CWA Section 308 information collection request on CSOs. The permittee may have submitted CSO monitoring plans or a report characterizing its CSOs, a report documenting implementation of the nine minimum CSO controls, or a Long-Term CSO Control Plan. Other documents and/or information that should be reviewed, if available, include:

- citizen complaints
- correspondence
- Notices of Violation
- annual capacity reports
- facility reports describing CSO discharge points and overflow problems
- inspection reports
- noncompliance notification reports describing overflows (usually attached to DMRs)
- proximity of overflows to drinking water sources
- potential for impact to human health or the environment.
- list of significant industrial users and a map showing their connection to CSS and location of nearby CSOs.

Reviewing these permittee reports will help the inspector become knowledgeable about the permittee's specific CSO problems and existing CSO controls. The inspector should make copies of those documents that (1) establish enforceable CSO requirements, (2) provide evidence that an enforceable requirement has been violated or (3) provide evidence of environmental problems related to CSOs. The inspector should make sure that EPA has a complete copy of noncompliance notification reports for the last five years, indicating the date, time, duration, flow rate, cause, and actions to correct, prevent, and mitigate each overflow from the facility. The inspector should also have a map or other document that provides the location of each CSO discharge point and identifies the receiving stream to which the overflow discharges.

Onsite Records Review

The inspector should review the following CSO records:

- Log books, reports, or internal memos describing maintenance and operation activities concerning the sewer system and CSO outfalls
- CSO outfall flow records
- Monitoring data on CSOs, collection system, or receiving stream
- Records pertaining to installation of CSO controls
- Feasibility studies
- Capital project summaries (description and cost of each project).

Record keeping requirements vary by facility depending on the specific CSO controls the facility has selected and is implementing. If the permittee has submitted a report documenting implementation of the nine minimum CSO controls, the inspector should review appropriate records kept at the facility to verify the information in this report. Examples of possible records that might be kept to document the implementation of the nine minimum CSO controls are listed in Table 12-3. These examples are provided as illustrations and not requirements. The inspector should use the facility's permit or other enforceable document as a guide to determine what specific records the facility is required to keep and maintain. The facility's CSO Operations and Maintenance manual and CSO control plan can provide the inspector with insight into the specific types of records the facility would have.

Interviews

As with all of the NPDES compliance inspections, interviews with appropriate personnel with firsthand knowledge of CSO activities can be useful in obtaining factual information. The inspector should interview the person in the highest position of authority responsible for the day-to-day development or implementation of the LTCP. Other personnel, such as the collection crew or others involved in inspecting, operating, and maintaining CSOs or CSO

controls should also be interviewed. It is particularly important that the inspector obtain written statements (see Chapter Two) where personnel are providing information that is not or cannot be substantiated by the facility's records or the inspector's own observations.

If the facility is developing or implementing a LTCP, the inspector may want to interview those personnel responsible for that plan. Generally, the facility will be under a schedule with distinct activities and milestones established. This schedule may be in the permit, but will more likely be in an enforcement order. Any schedules submitted by the permittee in a report or in its LTCP should not be referred to, as these are not enforceable schedules. The inspector should focus on verifying those LTCP development or implementation activities that (1) the permittee has reported have been developed/implemented and (2) the permittee was required to have developed/implemented according to a schedule in the permit or enforcement order.

The following are examples of relevant questions that the inspector can use to obtain a general understanding of the facility. Other questions relevant to the specific nine minimum controls are listed in Table 12-4. The inspector should add to these questions based on the specific requirements in the facility's permit. For example, if the permit requires submission of a "CSO Characterization Report" within 180 days of the permit issuance, the inspector should request the report and verify whether or not the report was submitted within the established time frame.

- What type of technology is used to control CSO discharges? Describe regulator mechanisms used, including size, type, presence or absence of backflow devices, and location.
- How are overflows monitored and reported? What instrumentation is used? Is there any "real time" data collected? How quickly can an operator adjust flow? Remotely?
- Describe the system, identifying the older and new facilities that are used.
- What communities are served by the treatment plant?
- Is the collection system gravity fed or are pumps used? If pumping stations are used, how many are there and where are they located?
- What flows does the municipality receive from other municipalities? Are these upstream systems combined sewer systems or separate sanitary systems? What kinds of overflow problems have the upstream municipalities reported? What agreements are in place establishing which municipality has authority and duty to maintain various parts of the sewer system?
- How many overflows have occurred in the collection system, including contributing jurisdictions, within the last five years?
- What is the most common cause of overflows?
- Where are the potential CSO point discharges located? Are any located at pump stations? What receiving stream does each CSO discharge to?
- What is a typical monthly rate of CSO incidents?
- What samples have been taken of overflows? (Ask to see sample results.)
- What steps is the municipality taking to comply with the CSO requirements in its permit? If the municipality is planning to meet a different schedule than that required in the permit, what is its time line?

Facility Site Inspection

An inspection of the CSO outfalls should be included in a NPDES compliance inspection in order to get a complete picture of how the overall publicly-owned treatment works (wastewater treatment plant and collection system) is performing. This is especially true if the inspection's focus or one of its objectives is to investigate compliance with CSO requirements. In such cases, an inspection of CSO structures, CSO treatment systems, or key areas of the collection system is necessary. If the intent of the inspection is to observe CSO treatment, it may be necessary to schedule this inspection during or immediately after a wet weather event. These outfalls would be located throughout the collection system and, therefore, may be several miles from the facility.

It is not necessary to inspect all of the CSO outfalls. The inspector can select a few either randomly or on the basis of location (closest to the plant) or other selection criteria. For example, the inspector may want to inspect those outfalls that treat solids and floatables to evaluate the operation and maintenance of the controls. The inspector might also select the largest (in discharge volume) outfalls, those that most frequently discharge (during wet weather), or those that are known to have an impact on water quality. Conversely, the inspector may want to select those outfalls that are subject to few inspections by the permittee.

If the inspector observes any dry weather CSO discharges, a photographic record should be made (see Chapter Two), and in depth interviews should be conducted and statements obtained from facility personnel.

Table 12-3
CSO Records

Nine Minimum CSO Controls	Examples of Records/Documentation
Proper operation and regular maintenance program	<ul style="list-style-type: none"> • Standard Operating Procedures, Operations and Maintenance Manual, or similar manual or plan • Log of sewer system cleaning, flushing, or debris removal • Log of repair or maintenance of regulators • Log of lift station malfunctions and repairs made • Log of preventive maintenance of interceptor lift stations and pumps • Work orders for corrective activities • Log of inspections of lift stations, sewer lines, and regulators
Maximum use of collection system for storage	<ul style="list-style-type: none"> • Hydraulic study of system and evaluation of alternatives to maximize wet weather flow storage capacity • Records of installation of in-line devices such as dams, regulators, and gates to retard flow • Installation of separate sanitary and storm water lines • Replacement of undersized pipes • Adjustment of regulator settings or upgrading/adjusting pumping rates at lift stations • Off-line temporary storage
Review and modification of the pretreatment program	<ul style="list-style-type: none"> • Inventory of nondomestic discharges • Assessment of significance of nondomestic discharges on CSO and receiving waters • Pretreatment controls to reduce/eliminate industrial contaminants during wet weather

Table 12-3
CSO Records (Continued)

Nine Minimum CSO Controls	Examples of Records/Documentation
Maximization of flows to the POTW for treatment	<ul style="list-style-type: none"> • Summary of analyses conducted • Maximum wet weather flow Wastewater Treatment Plant (WWTP) can receive without pass-through or interference • Description of modifications to be implemented
Prohibition of dry weather overflows (DWOs)	<ul style="list-style-type: none"> • Log of inspections of CSOs during dry weather and observations made during these inspections • Log of Dry Weather Overflow (DWO) reports submitted
Control of solids and floatable materials in CSOs	<ul style="list-style-type: none"> • Installation of screens or booms • Source control activities such as regular street cleaning, highly visible anti-litter programs
Pollution prevention	<ul style="list-style-type: none"> • Street sweeping, anti-litter campaigns
Public notification	<ul style="list-style-type: none"> • CSO outfalls are posted with signage • Date and proof of public notice, procedure (by newspaper, radio), public notice information
Monitoring of CSOs	<ul style="list-style-type: none"> • Identification of outfall locations (i.e., latitude and longitude or street address) • Number and location of overflow events including duration, volume, and pollutant loadings • Receiving stream data and impact (e.g., beach closings, fish kills) • Monitoring plan

Table 12-4

CSO Interview Questions

Nine Minimum CSO Controls	Examples of Interview Questions
Proper operations and regular maintenance program	<ul style="list-style-type: none"> • How often are CSO discharge locations inspected? Who conducts the inspections? What records do they keep? How is corrective action assured when a problem is discovered? How are the operability and reliability of regulators verified? • Do the pump stations have backup power? Is there any telemetric alarm warning system? Is any other type of redundancy built into the collection system to minimize the occurrence of overflows? • What is the municipality's budget for collection system operation? For collection system maintenance? How much was spent last year on collection system operation and maintenance? • How many people are dedicated to maintaining the collection system? • What improvements are planned? Are these projects funded? What is the process for funding capital improvements? • How are personnel trained? • How often is the Operations & Maintenance plan reviewed? When was the last revision?
Maximum use of collection system for storage	<ul style="list-style-type: none"> • What steps are taken to maximize use of the collection system for storage? (e.g., install dams, weirs, and regulators)
Review and modification of the pretreatment program	<ul style="list-style-type: none"> • When were the pretreatment requirements last reviewed to ensure minimization of CSO impacts from upstream Industrial Users? What changes have been made to the program to accomplish this goal? What percentage of total flow comes from nondomestic sources? How is the impact of untreated industrial pollutants from CSOs addressed in the pretreatment program?
Maximization of flows to the POTW for treatment	<ul style="list-style-type: none"> • What steps are taken to maximize flow to the POTW? • What are the bottlenecks in the sewer system? What facilities in the system are critical to the performance of the CSS? • What are the capabilities of major interceptors and pumping stations delivering flows to the treatment POTW? • How do wet weather flows to the POTW compare with dry weather flows? • How does the current total flow compare to the design capacity? • What, if any, unused treatment facilities are used to store wet weather flows?

Table 12-4

CSO Interview Questions (Continued)

Nine Minimum CSO Controls	Examples of Interview Questions
Prohibition of dry weather overflows (DWOs)	<ul style="list-style-type: none"> • What has the municipality done to eliminate dry weather overflows? • How does the municipality identify dry weather overflows? If inspections are used, how often are the inspections performed? • Describe the most recent cleaning, sewer repair, or regulator repair performed to alleviate a dry weather overflow. • How does the municipality determine which dry weather overflows could endanger health or the environment?
Control of solids and floatable materials in CSOs	<ul style="list-style-type: none"> • How does the municipality keep solids and floatables out of the CSO discharge? • If solids and floatables do reach the receiving waters, how does the municipality remove them?
Pollution prevention	<ul style="list-style-type: none"> • What pollution prevention measures (e.g., street cleaning, public education, waste collection or recycling) does the municipality take to keep contaminants from entering the sewer system?
Public notification	<ul style="list-style-type: none"> • How has the public been notified of the location of CSO discharge points? How does the municipality notify the public of overflow incidents? When was the last notification? • What is the internal mechanism for reporting sewage overflows? How does this information reach the permitting authority?
Monitoring of CSOs	<ul style="list-style-type: none"> • How does the municipality monitor CSOs? How does the municipality use this monitoring to characterize the impacts of CSOs? How does the municipality use this monitoring to evaluate the effectiveness of CSO controls? Does the municipality monitor CSO flow rates? • What information from other groups (e.g., Coast Guard or local volunteer groups) does the municipality collect on water quality or use of waters affected by CSOs (e.g., beach closings, fish kills, etc.)? • Which CSO receiving waters are the most sensitive? Why? (e.g., drinking water)

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12. C. References and Checklist

References

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CSO EVALUATION CHECKLIST

A. IDENTIFICATION OF CSOs

Yes	No	N/A	1. Are all CSO points identified?
Yes	No	N/A	2. Does facility have maps/schematics of Combined Sewer System (CSS) depicting location of all CSO discharge points?
Yes	No	N/A	3. Is each CSO discharge point located by longitude, latitude, and street address on appropriate maps?

B. DRY WEATHER OVERFLOWS

Yes	No	N/A	1. Are the locations of all dry weather CSOs known by permittee?
Yes	No	N/A	2. Does permittee have records of quantitative loads and flows on all dry weather CSO events?
Yes	No	N/A	3. Has notification been given to EPA/State of all dry weather CSO discharges?
Yes	No	N/A	4. Are there any unreported dry weather CSOs?

C. RECORDS

Yes	No	N/A	1. Are the following records kept for CSO events?
Yes	No	N/A	• Location
Yes	No	N/A	• Frequency of discharge
Yes	No	N/A	• Flow magnitude
Yes	No	N/A	• Discharge pattern
Yes	No	N/A	• Total volume of discharge
Yes	No	N/A	• Duration of the event
Yes	No	N/A	• Pollutant characterization
Yes	No	N/A	• Correlation with rainfall records
Yes	No	N/A	• Specific causes of overflows
Yes	No	N/A	• Flow collected/flow diverted?
Yes	No	N/A	2. Are records of CSO flows maintained?
Yes	No	N/A	3. Are records accurate?

CSO EVALUATION CHECKLIST

D. OPERATION AND MAINTENANCE

Yes No N/A	1. Is there a CSS O&M manual and does it address O&M of CSO structures?
Yes No N/A	2. Does the facility conduct inspections of the CSS and CSO structures?
Yes No N/A	3. Are these inspections documented? Does documentation include results of various types of inspections, dates and times, corrective action taken if problems were found?
Yes No N/A	4. Is a log book of maintenance and repair on the CSS and CSO structures maintained? Does this note the type of problem (or indicate routine maintenance), repair made, or maintenance activity conducted, date?

E. COMPLIANCE SCHEDULES

Yes No N/A	1. Is permittee meeting CSO compliance schedule for: <ul style="list-style-type: none"> • Implementing nine minimum CSO controls? • Developing LTCP? • Implementing LTCP?
Yes No N/A	2. Has permittee requested an extension of time?

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