

Summary of changes to the draft CSO LTCP

The following changes were made in response to comments received:

A short paragraph on integrated planning was added, and clarifications were included throughout the document to clarify that this document only deals with CSOs, but that other systems have impacts on the receiving waters that should be considered outside of the CSO LTCP.

The word “existing” was removed from references to WMZ and criteria was referenced for how to get a CSO authorized to discharge to a new WMZ.

The phrase “cause or contribute to” was changed to “cause”.

“Prove” was changed to “reasonably demonstrate”.

The references to development moratoria were removed.

The reference to communities building the combined sewer systems was removed.

The degree of accuracy for location was decreased to match that requested in stormwater permits. A sentence was added to emphasize that the infrastructure that needed to be located and used in a model was up to the modeler. Guidance was provided on how to obtain existing GIS data from VCGI.

LTCP-EZ forms were mentioned. However, because these forms are based upon allowing 4 overflows per year they will not likely be sufficient for demonstrating that CSO discharges do not violate VWQS. They may be useful for calculation purposes.

The sections on each drainage/collection system were combined to eliminate redundancy. Emphasis was placed on CSS systems and how their maintenance can impact overflows.

Clarification was provided on how to implement a precipitation monitoring system that was different from the one described in the CSO rule.

Modelling sections for Receiving water and collection system were separated and defined in more detail. It was clarified that modelling is only needed for areas that have CSS systems that contribute to the problems. Additional software was suggested.

The benefits of modelling receiving water hydrology and pollutant characterization were better explained.

QAPP section was redefined as a subsection of the Monitoring Plan.

Clarification was added regarding first flush phenomena in response to a comment from Stantec.

The “design storm” section(s) were clarified to indicate that the storm described in the CSO rule is NOT a design standard. It was clarified that each CSO outfall may require a different design storm depending upon existing conditions. CSO discharges must not cause exceedances of VWQS regardless of the storm event size or intensity.

The 9 minimum controls were identified as technology-based control.

Pollutants of concern were better defined as those that a problem in the receiving waters, and it was clarified that the CSO LTCP doesn't have to address stormwater and treated sewage.

Green Stormwater Infrastructure was broadened to include grey infrastructure as well. This section also includes clarification that public projects should be included, but that private ones don't need to be, but can if the data is available.

Compliance criteria was better defined to match the language of the CSO rule. The ways to demonstrate compliance were better defined, and water quality modelling for pollutants was included at the request of Stantec.

It was clarified that compliance with VWQS for CSO discharges was only necessary when there is a discharge, and that dry weather discharges are always prohibited.

A sentence acknowledging that temporary impacts to sensitive areas to address the long-term impacts of a CSO were allowable and to be expected. The controls will usually need to be implemented where the problems are.

A sentence was added stating that a combination of control types would likely be needed, and that additional improvements to operations and maintenance counted as alternative projects for the future.

The entire proposed method for evaluating alternatives was removed and replaced with a requirement to have a system and keep some records.

The public input section was revised to eliminate the longer requested dates. The public meeting law requirements were set as the minimum with a caveat that the funding agency(s) may have different requirements and the town should check with them.

The section on affordability analysis was revised to allow for additional flexibility and to clarify that the implementation schedule and chosen projects must be projects that the community is able and willing to fund within the proposed timeline.

Additional minor changes were made to better organize the document and to refine the language to make it more concise and/or accurate.