

WEF Comments: EPA's National Enforcement Initiatives for FY 2014 – 2016

Docket ID: EPA-HQ-OECA-2012-0956

The Water Environment Federation [WEF]¹ appreciates the opportunity to comment on EPA's National Enforcement Initiatives for FY 2014-2016. We find the six proposed national enforcement initiatives to be reasonable and appropriate.

WEF supports the first proposed initiative "*Municipal Infrastructure-addressing sewage discharges from combined sewer systems, sanitary sewer systems, and municipal separate storm sewer systems*". Many environmental and management challenges confront us all as we endeavor to address wet weather water pollution. While enforcement and compliance have a role to play, WEF encourages EPA to work with States, localities and other relevant stakeholders to craft workable, affordable solutions that can be implemented via the NPDES permit system. We generally believe such mutually developed NPDES approaches are preferable to enforcement actions.

WEF is particularly encouraged that OECA is working with EPA's Office of Water to implement the *Integrated Municipal Stormwater and Wastewater Planning Approach Framework* that will enable municipalities and local utilities facing wet weather issues to craft phased, affordable approaches that address their most pressing wet weather problems first and provide meaningful environmental benefits. While EPA's integrated framework holds much promise, WEF still encourages EPA to consider new/ revised guidance or regulations to better define workable wet weather approaches including reasonable, affordable solutions to separate sanitary systems overflows and peak treatment. Local communities would benefit from updated, specific guidance from EPA as they develop their integrated approaches.

Also, as OECA develops its next round of national enforcement initiatives after FY 2016, WEF would encourage EPA to provide specific data and analyses that indicate why future initiatives are selected and given priority. Specifically, what are the anticipated costs and environmental/health benefits associated with priority initiatives. How do these costs and benefits compare to other potential initiatives that are not selected as EPA priorities?

These comments were submitted on February 26, 2013, for WEF by Carl Myers, Assistant Director, WEF Government Affairs [cmyers@wef.org]. As requested by EPA in the FR notice, these comments were submitted online at www.regulations.gov

¹ Founded in 1928, the Water Environment Federation (WEF) is a not-for-profit technical and educational organization of 36,000 individual members and 75 affiliated Member Associations representing water quality professionals around the world. WEF members, Member Associations, and staff proudly work to achieve our mission to provide bold leadership, champion innovation, connect water professionals, and leverage knowledge to support clean and safe water worldwide.