

# CSO Disconnection

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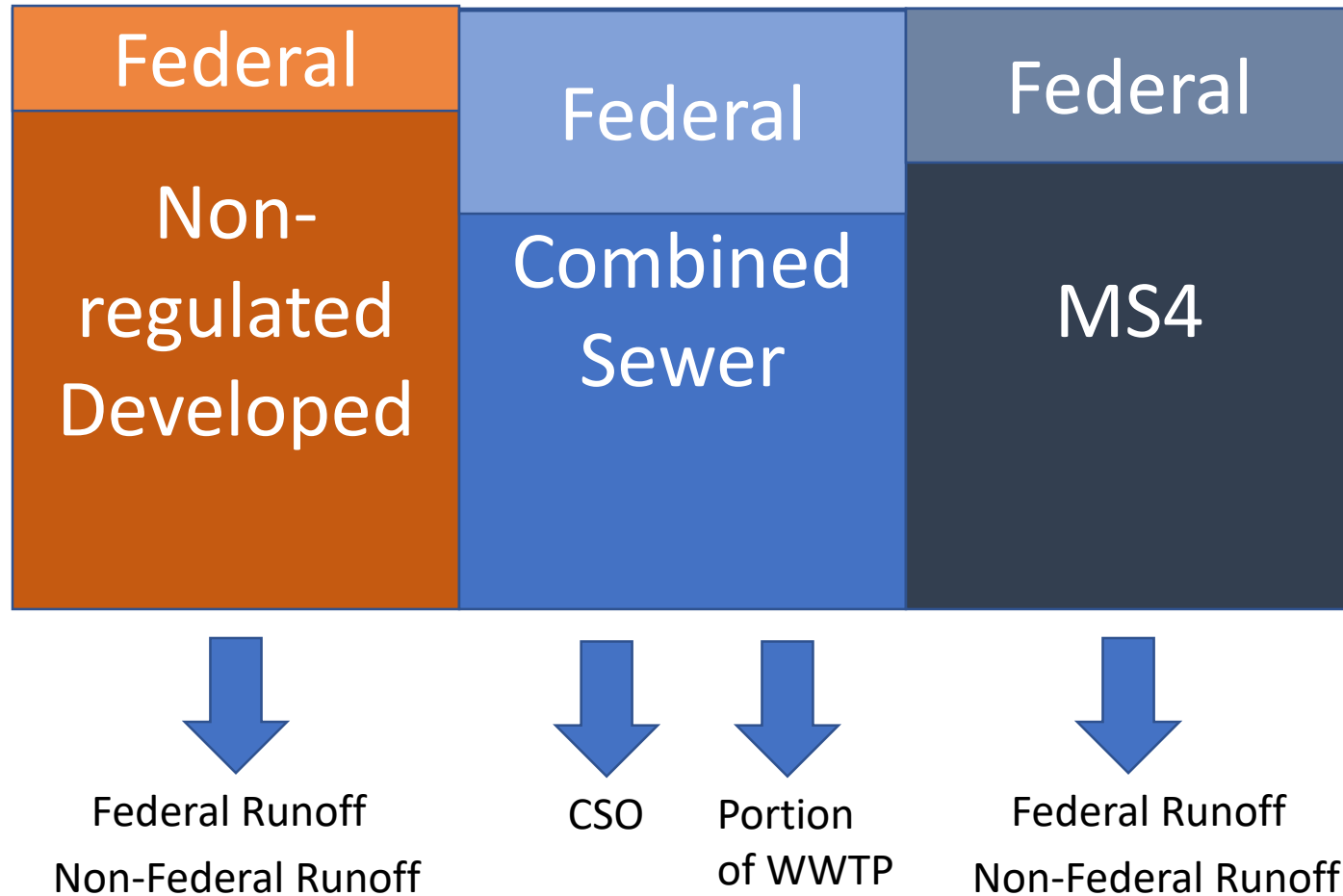
Jonathan Champion

James Davis-Martin

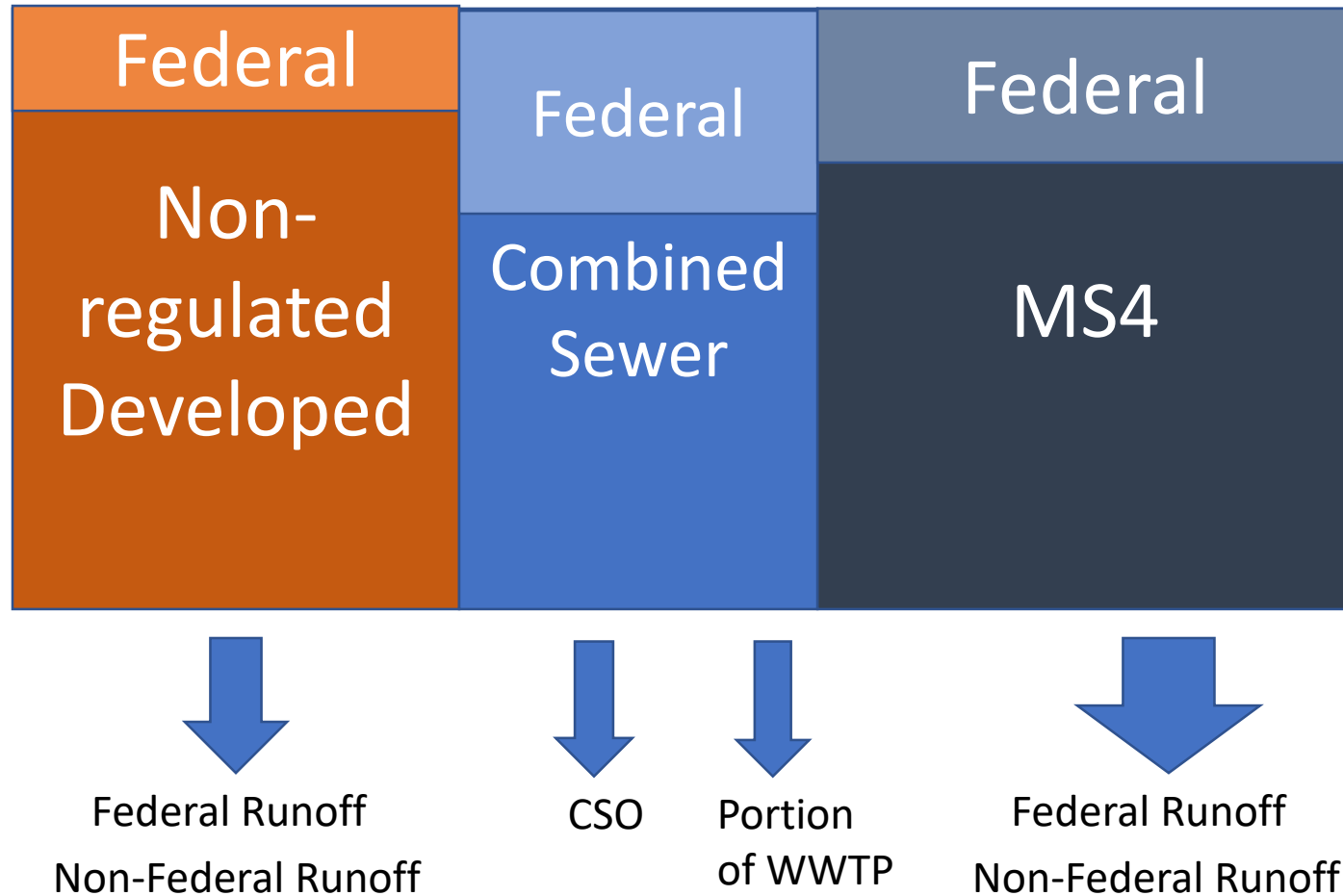
WQGIT

2/11/2019

# Combined Sewer Disconnection



# Combined Sewer Disconnection

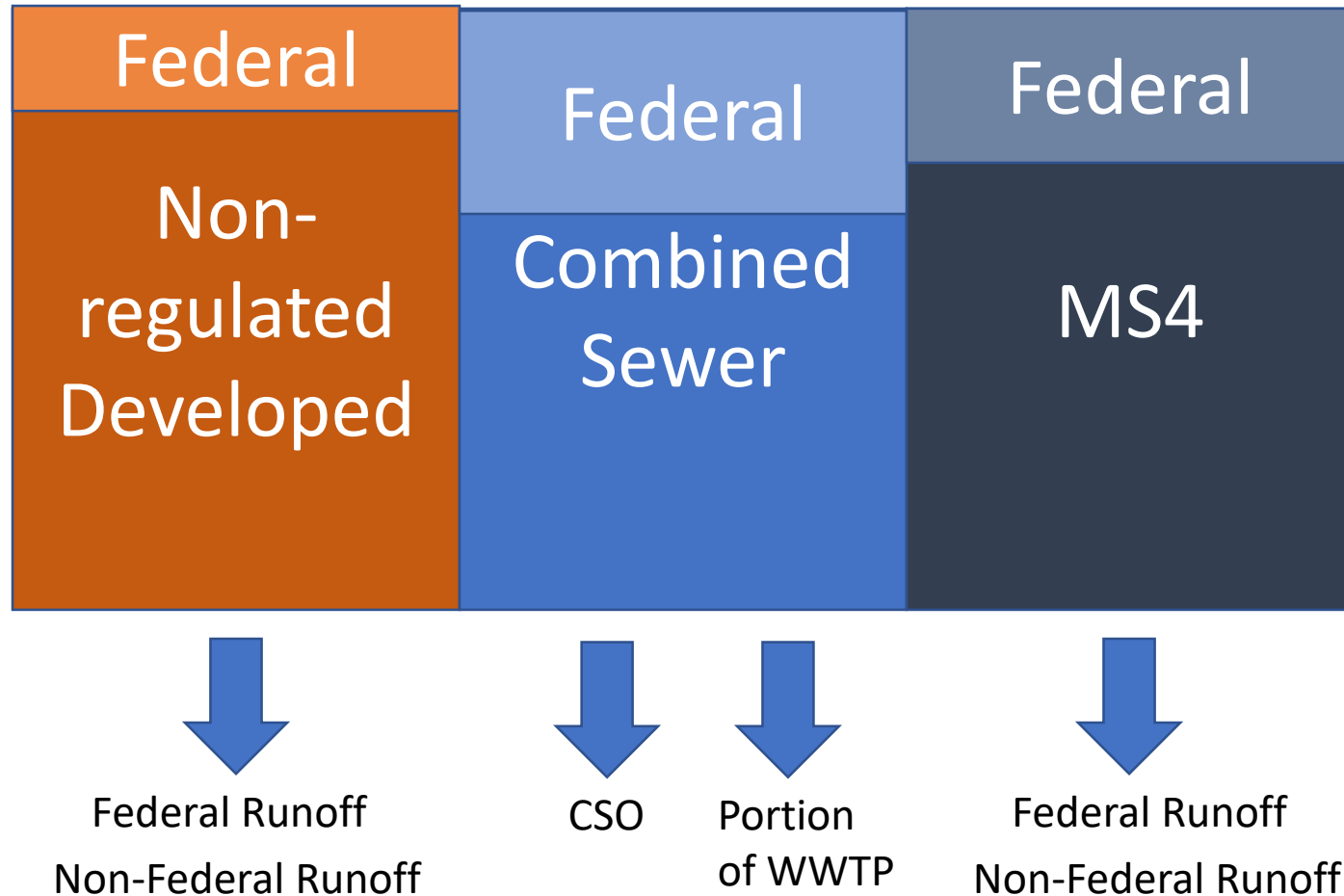


CSO calculated to decrease  
WWTP should show decrease in data  
MS4 runoff increases

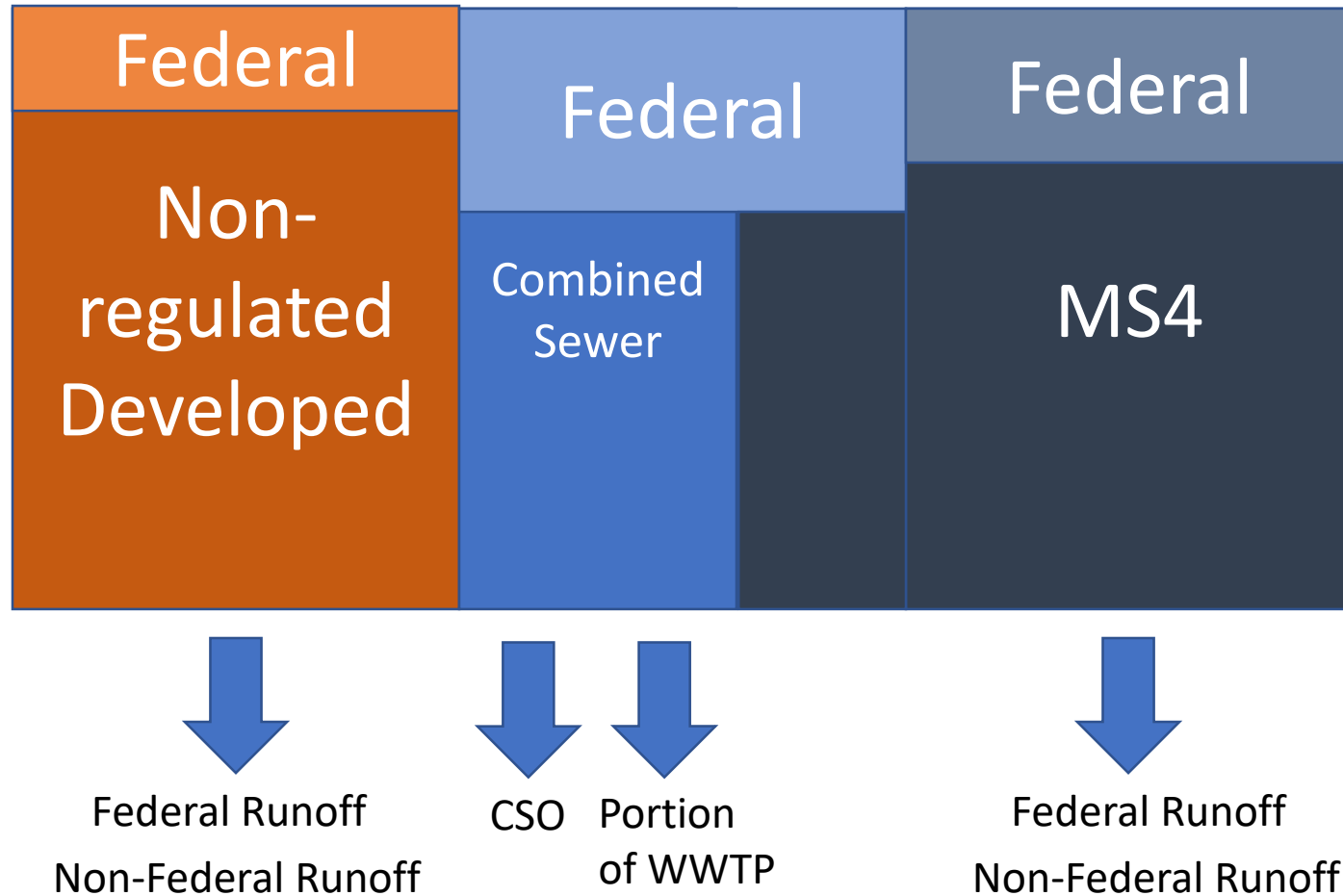
# DC

- CSO loads are not counted as federal loads
- Federal agencies are working toward targets
- Disconnections makes federal loads increase or appear where there were none previously.
- Inaccurate since the disconnection is happening in relatively natural areas

# Combined Sewer Disconnection



# Combined Sewer Disconnection



CSO same decrease  
WWTP same decrease  
MS4 runoff increases for non-federal only

# Proposed solution - DC

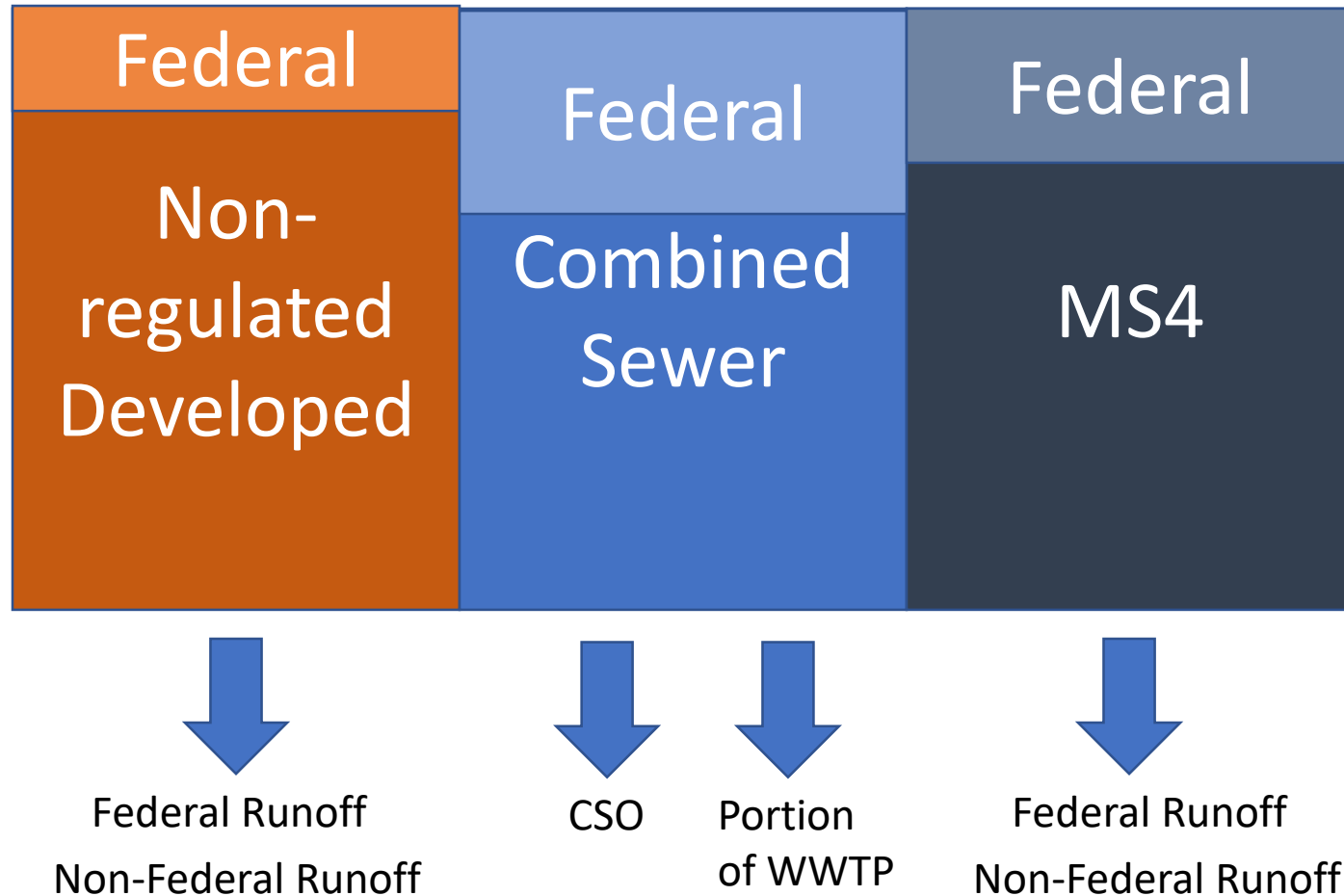
- Allow combined sewer disconnections to be specified as either affecting all agencies in a land-river segment proportionally, or applying to only the non-federal areas of the land-river segment.
  - If it is not specified, it will be assumed to apply to all agencies proportionally.
  - If there is not enough non-federal land to accept the entire disconnect, the disconnections will be capped at the total amount of non-federal land in the land-river segment.
- Jurisdictions can update point source files for new scenarios, including 2018, to apply disconnection to non-federal land.
  - Previous scenarios updated on request

# Justification:

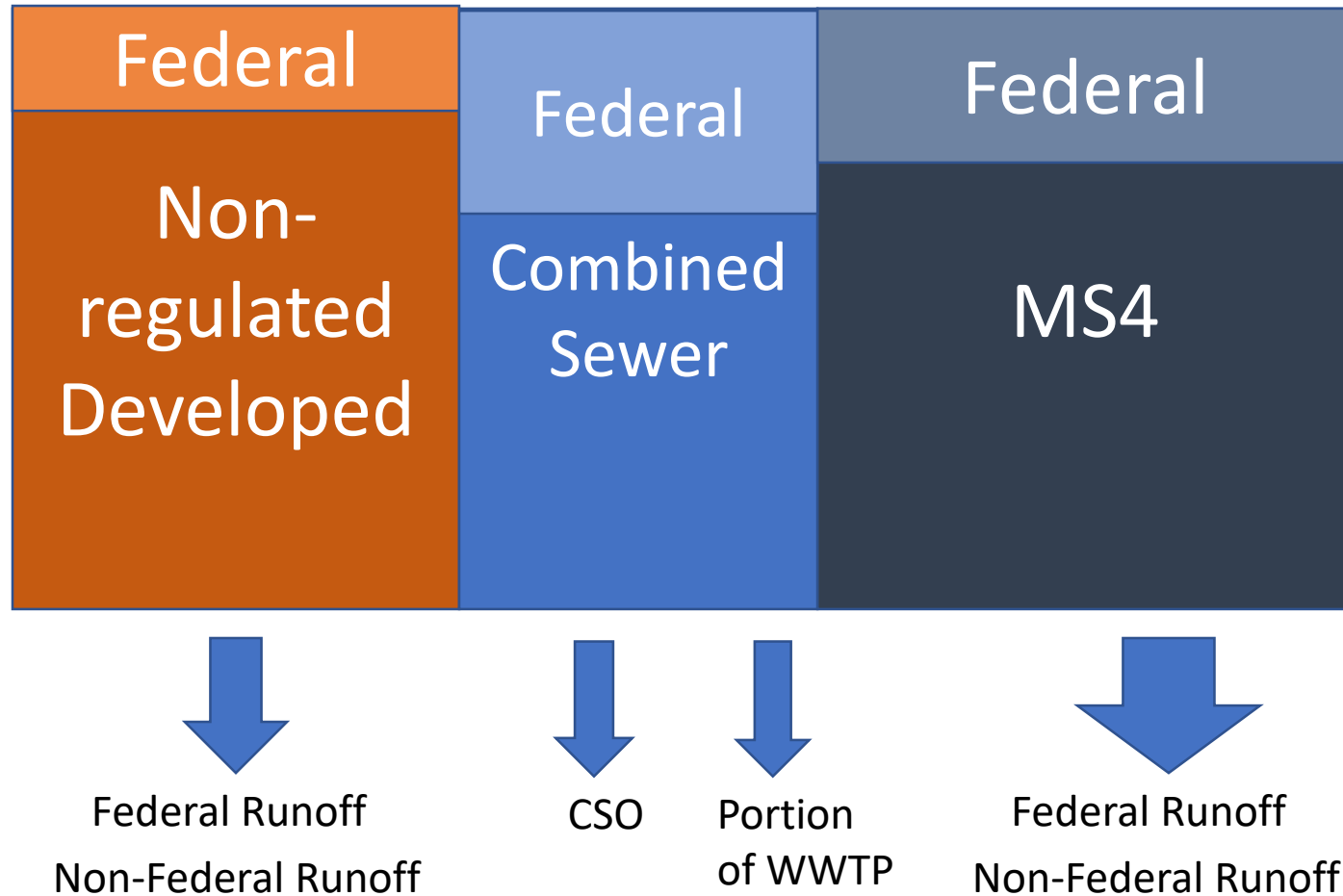
- More accurate
- Better accounting of responsibility within DC
- Backwards compatible.
- Very small effect on loads at the land-river segment scale
- It is a fairly low work load for the CBPO.



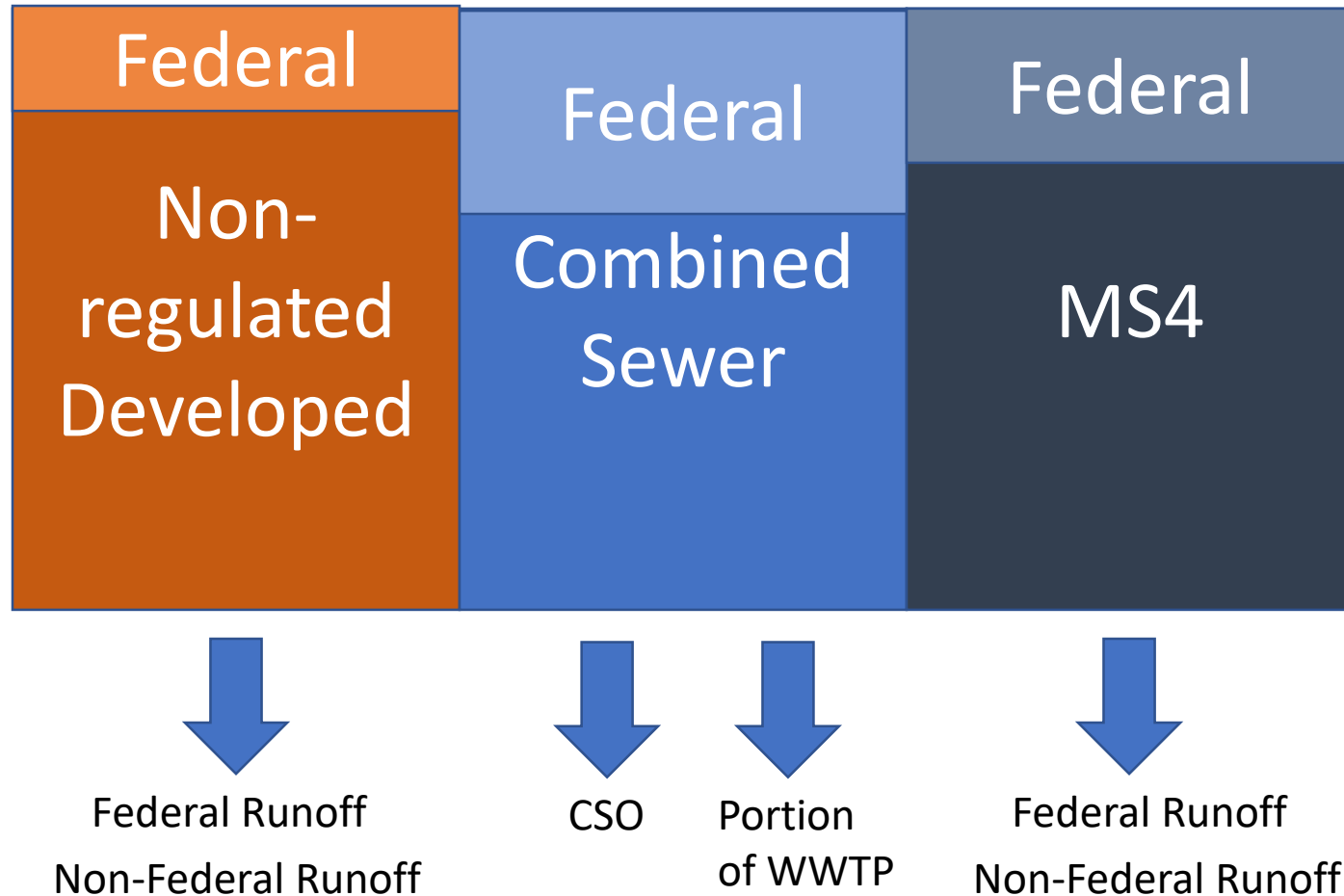
# Virginia Suggestion - WTWG



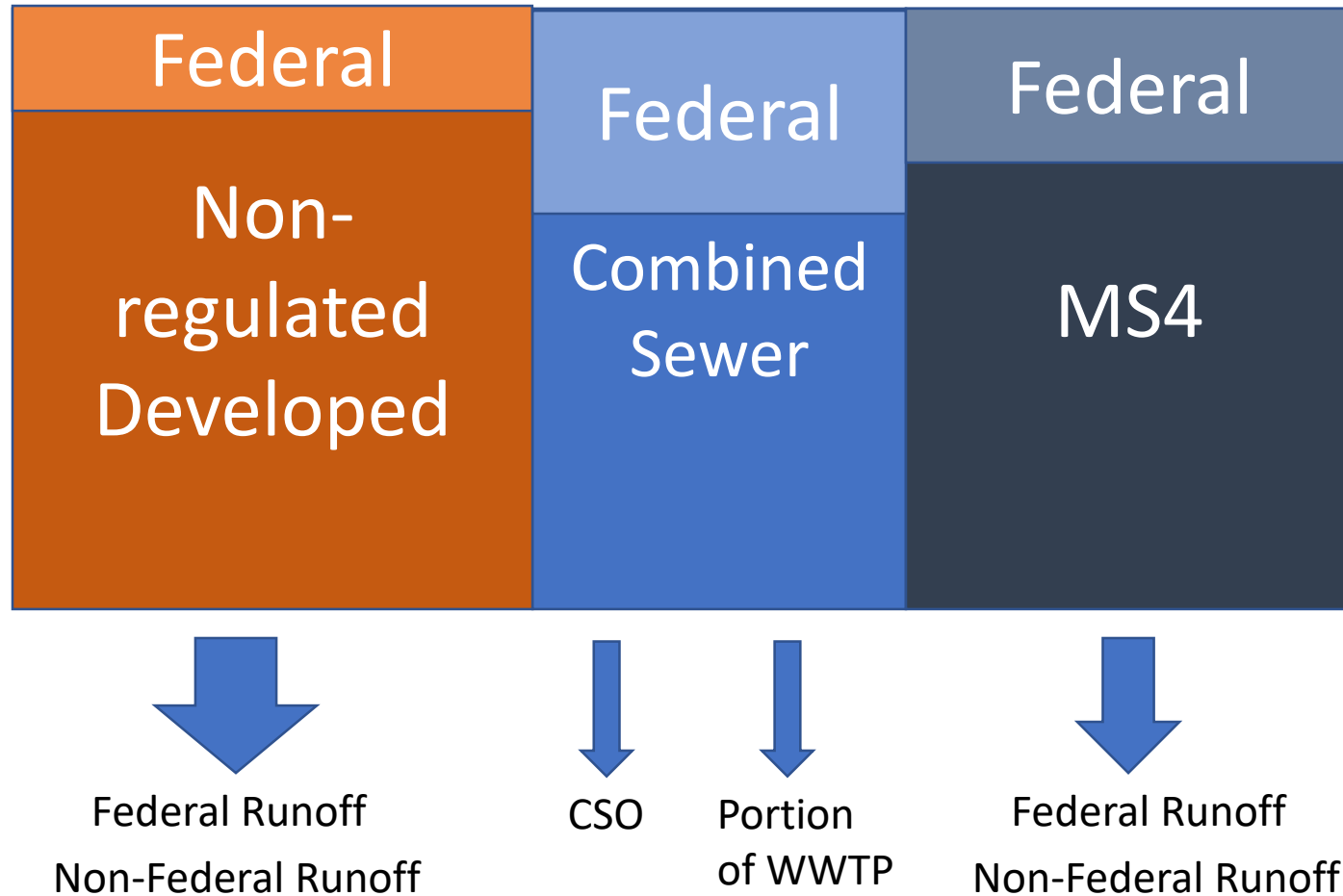
# Rather than MS4



# Virginia Suggestion - WTWG



# Allow conversion to non-regulated



CSO same decrease  
WWTP same decrease  
Non-regulated increases rather than MS4

# Proposed solution - VA

- Allow combined sewer disconnections to be specified as either converting to MS4 or non-regulated.
  - If it is not specified, it will be assumed to apply to MS4.
  - Construction is always regulated
- Jurisdictions can update point source files for new scenarios, including 2018, to apply disconnection to non-federal land.
  - Previous scenarios updated on request

# Justification:

- More accurate
- Does not create MS4 areas where none existed
- Backwards compatible.
- Very small effect on loads at the land-river segment scale
- It is a fairly low work load for the CBPO.

# Decision Requested

- Allow Combined Sewer disconnects to be specified to apply to non-federal land only
- Allow Combined Sewer disconnects to be specified to apply to non-regulated developed land rather than MS4