



the clarifier

Water Pollution Control Revolving Loan Fund Program
Water Pollution Control Emergency Loan Fund Program

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MDEQ Announces Kickoff of 2012 Clean Watersheds Needs Survey (CWNS)

CWNS Overview

The U. S. Environmental Protection Agency (EPA), in partnership with the States, conducts the CWNS to identify and document the cost of capital needs required to meet the water quality and water-related public health goals of the Clean Water Act (CWA). The CWNS is required under section 205(a) of the CWA and section 516(b) of the Water Quality Act of 1987, which amended the CWA.

Every four years, the States and EPA collect information about publicly owned wastewater collection and treatment facilities, storm water management activities; nonpoint source (NPS) pollution control projects; and decentralized wastewater treatment facilities. The information collected about these facilities and projects include estimated needs, costs and technical information; location and contact information; facility population served, flow, effluent, and unit process information; and NPS best management practices (BMPs).

Results of the 2008 CWNS in Mississippi

The last CWNS was conducted in 2008. Mississippi reported needs totaling \$3.33 billion in the 2008 CWNS. This was a twenty-eight percent (28%) increase from the \$2.6 billion reported in the 2004 CWNS. The types and amounts of needs reported included: \$347 million in wastewater treatment plant improvement needs; \$1.07 billion in wastewater collection and conveyance improvements needs; \$154 million in home sewage

treatment needs; \$323 million in agriculture best management practices (BMP) needs; \$16 million in forestry BMP needs; and \$1.42 billion in water resource restoration and protection needs.

The enactment of the Clean Water Act (CWA) in 1972 has resulted in dramatic improvements in the:

- Number of wastewater treatment plants in the state.
- Percentage of the population served by wastewater treatment plants in the state.
- Level of effluent quality from wastewater treatment plants in the state.

In 2008, 62% of Mississippi residents were receiving centralized wastewater treatment services at the secondary, greater than secondary, or no discharge treatment levels, compared to 26% in 1972.

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Significance of CWNS

The CWNS provides a detailed estimate of the capital costs of needs eligible under the Clean Water Act (not just the Clean Water State Revolving Fund {CWSRF} loan eligible costs). The amount of capital costs for point source and non-point source needs documented in the CWNS may ultimately determine the level of future federal appropriations to the CWSRF loan program and other Clean Water Act programs, such as Section 319 grants and Unified Watershed Assessments funds.

Therefore, it is advantageous for the State to provide a comprehensive documentation of all existing needs in order to insure that Mississippi receives its maximum allocation of federal funds in the CWSRF loan program. So, even if you do not intend to come through the CWSRF loan program to fund your wastewater project, we are still asking that you help us document the maximum possible amount of wastewater needs in the State by submitting your wastewater needs to our office so that they can be counted during this CWNS.

Changes in the 2012 CWNS

In order to make it easier for the local communities to document needs during the 2012 CWNS the following changes have been made to the data collection process:

- The definition of needs has been expanded to include 20-year needs estimates. For 2012, EPA defines a need as the **unfunded** capital cost - - **as of January 1, 2012** - - of a project that addresses an existing or projected (within the next 20 years) water quality or water quality related public health problem.
- Clean Water State Revolving Fund eligibility is no longer a requirement for CWNS eligibility. Communities may report needs for facilities and projects that are not CWSRF eligible, as long as they meet the CWNS eligibility and documentation criteria outlined later in this newsletter.
- The scope of eligible non-point source (NPS) pollution control projects now includes both needs addressing impaired waters and NPS prevention activities for all waters.
- Small Community Needs forms may be signed by a local official representing the community. Note: a local official can be an elected official (e.g. mayor) or other qualified official (e.g. public works manager or wastewater plant operator).

- EPA has approved the State's Large Community Needs form as an acceptable documentation of needs, but not for costs. The large community ($\geq 10,000$ population) can use this form to document needs, and recommended solutions to meet these needs, and the State can use the cost curves in the CWNS database to calculate costs associated with the reported needs.

2012 CWNS Schedule and Milestones

- March 2012 MDEQ kicks off the data collection phase by sending facility fact sheets and community needs forms to all communities in the state requesting corrections and documentation of new needs.
- Sept. 30, 2012 Deadline for communities to submit needs documentation to MDEQ for entry into the CWNS database.
- Oct. 26, 2012 Last day for data entry.
- Nov. 2012 – Dec. 2012 Data review and reconciliation.
- Late 2013 EPA Delivers CWNS 2012 Report to Congress

2012 CWNS Data Collection Procedures

The CWNS is a national effort, and therefore, data comparability between States is extremely important to the overall consistency and quality of the CWNS database. To ensure data comparability, State data collection procedures must follow a set of guidelines and criteria for gathering, documenting, and entering data.

CWNS data is organized by facility/project. Each facility/project represents the location of an activity that addresses a current or projected water quality or water related public health problem. The term "facility" is used when the needs are for wastewater treatment, storm water management activities, and decentralized wastewater treatment. The term "project" is used to describe NPS pollution control activities.

What is a "Need"?

For 2012, EPA defines a need as "the unfunded capital costs – as of January 1, 2012 – of a project that addresses an existing or projected (within next 20 years) water quality or water quality related public health problem." In order to be included in the 2012 CWNS, the facility/project must:

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1. Have a capital need in one of the official CWNS needs categories referenced below;
2. Meet the seven CWNS documentation requirements listed below.

all other needs, the documentation date has to be January 1, 2002, or more current.

2012 CWNS Needs Categories

Needs are collected in twelve categories (Note: There is no category XI). For some Needs Categories, official needs only include publicly-owned facilities. See Appendix 3 to the enclosed CWNS 2012 Small or Large Community Needs form for a complete list of Needs Categories.

2012 CWNS Documentation Requirements

To be eligible for the 2012 CWNS, each facility and project must provide the following seven elements of information:

1. **A description of the water quality impairment and information on its potential source.** The problem description should include specific pollutant source information and/or specific threats to the water body. A general statement about water quality impairment or threat does not meet this criterion.
2. **The location of the problem must be identified** as either a single latitude/longitude point, a polygon, or a county, watershed or town.
3. **The solution to the problem.** One or more specific pollution control measure(s) or best management practices (BMPs) to address the identified problem or threat.
4. **The cost of each solution.** The cost to implement each pollution control measure or specified BMP must be provided. General estimates for the problem area are not permitted; only site-specific data is acceptable to generate costs.
5. **The source of the cost.** (e.g., engineer's estimate, cost from comparable practices, estimates from equipment suppliers) for each solution must be identified.
6. **The total cost.** The total cost of all pollution control measures and BMPs documented for the facility or project must be provided.
7. **Current documentation.** For needs greater than \$30 million (January 2012 dollar base), the documentation date has to be January 1, 2006, or more current. For

Two Levels of Documentation

The CWNS allows for two levels of documentation: one level for large communities ($\geq 10,000$ population); and a second level for small communities ($< 10,000$ population). This population is the sum of the present resident population receiving centralized wastewater treatment, present resident population serviced by onsite wastewater treatment systems; and the present resident population not receiving treatment.

The present resident population receiving centralized treatment includes any upstream population serviced by other collection facilities that deliver wastewater for treatment at a facility in the community. For example, Community A (population 5,000) collects and discharges wastewater to a treatment plant in Community B (population 7,000). Community B is not a small community for CWNS purposes, because its total population receiving treatment is 12,000.

Level One – Large Community Needs

Large communities (population $\geq 10,000$) are asked to complete the Large Community Needs form and, if available, provide documentation that illustrates that there is an existing need to prevent or abate a water quality or water quality related public health problem, and explain the solution to the problem, the cost for each solution, and the basis of the cost. (See Appendix 1 in the enclosed Large Community Needs form for a complete list of acceptable documents that may be used to justify needs and costs).

If documentation is not available to support the needs, solutions and cost associated with your community's needs, the Department asks that you complete and sign the Large Community Needs form to document your community's needs and the proposed solution. Based on your reported needs and solutions the Department will use the CWNS cost curves to calculate costs so that we can document as many needs as possible.

MDEQ staff will be contacting large communities in the near future to discuss possible documentation efforts.

Level Two - Small Community Needs

There are two ways to document needs for small communities (populations $< 10,000$):

1. Standard needs and costs documentation. Small communities are encouraged, but not required, to provide MDEQ with the same type documentation required for large communities to support their needs and costs, if such documentation is available. (See Appendix 1 in the enclosed Small Community Needs form for a complete list of acceptable documents that may be used to justify needs and costs.) The documents should illustrate that there is an existing need to prevent or abate a water quality or public health problem and explain the solution to the problem, the cost for each solution, and the basis of the cost.

2. Completing a Small Community Needs Form. Small communities may not be able to provide sufficient documentation to justify needs and/or costs. If there is no or inadequate documentation available, then small communities may simply complete the enclosed Small Community Needs Form.

a. Water quality needs are certified by the signature of a local official representing the community. Note: a local official can be an elected official (e.g., mayor) or other qualified official (e.g., public works manager, wastewater treatment plant operator).

b. Costs are certified by one of the following:

- i. A professional engineer (PE) signs a cost certification.
- ii. A local government official signs a cost certification and a State Professional Engineer (PE) certifies that the cost is reasonable after reviewing the estimate.

iii. No cost certification signature is provided; the state uses cost curves, if possible, to generate estimated costs.

The most common way for a small community to provide information to the State is by completing the Small Community Needs Form.

Enclosed with this newsletter is a copy of the Large or Small Community Needs Form customized for your community. Please review this needs form and make any corrections to needs that were documented in the 2008 CWNS and add any additional needs that may now exist.

Once completed mail the completed form to:

Tom Webb
Construction Branch
MS Department of Environmental Quality
P O Box 2261
Jackson MS 39225-2261

along with copies of any documentation of the needs and the cost associated with these needs. Please indicate whether you want the documentation returned to you after review by our office.

Thank You for Your Participation in This Survey

The Department would like to take this opportunity to thank you in advance for participating in this Survey. Without your cooperation this Survey would not be possible. If you should have any questions please call Tom Webb at 601-961-5136.