APPENDIX D

The permit writer may find this checklist useful in reviewing the long-term control plan submitted by the permittee. However, because some items listed in the checklist may not be applicable to the permittee, there may not be a "yes" answer to every question.

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
Public Participation				
Does the public participation process seek to actively involve rate payers, industrial users of the CSS, persons near the impacted waters, and persons who use the impacted waters?				
Does the public participation plan document how the public was notified of public participation events?				
Does the public participation plan include a record of the public participation events, including the number of people attending and a record or summary of comments?				
Does the public participation plan contain a summary of comments and the changes or decisions made in response to public comments?				
Evaluation Result (circle one)	**Adequate**	**Inadequate**	**Other**	

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
CSS Characterization, Monitoring, and Modeling				
Is there a general description of the CSS that includes the geographical area and population served?				
Is there a map of the CSS depicting the location of all CSO outfalls and receiving water bodies?				
Have sensitive areas and all outfalls located in these areas been identified?				
Is there description of how the CSS responds hydraulically to rainfall events and is it adequate to determine which rainfall events trigger CSOs?				
Is there information on the volume, flow rate, and frequency of CSOs and the pollutants discharged?				
Is there information on the CSO pollutant loadings and their impact on receiving waters?				
Has all available information on pollutant loadings from other point and nonpoint sources in the watershed and their impacts on receiving waters been identified and compiled?				
Is there information on designated water uses and whether designated uses are being met?				
Does the CSS and CSO characterization provide information on the known effects of the CSOs on water quality during precipitation events, as well as provide the level of detail needed to model or project both the operation of the system and the impacts of various overflow scenarios on the receiving waters?				
Is monitoring sufficient to document baseline conditions to allow the permittee to demonstrate the long-term benefits of CSO controls?				
Has the monitoring been coordinated with any ongoing or planned State programs and programs of other permittees within the same watershed?				
If modeling was conducted, is the model identified and described and are the results provided?				
Evaluation Result (circle one)	**Adequate**	**Inadequate**	**Other**	

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
CSO Control Alternatives				
Did the permittee develop a comprehensive list of CSO control alternatives?				
Did this list include alternatives from each of the four general categories—source controls, collection system controls, storage, and treatment technologies (described in *Combined Sewer Overflows—Guidance for Long-Term Control Plan* [EPA, 1995a])?				
Are the CSO control alternatives that were considered described?				
Does the plan describe the process by which the CSO control alternatives were developed?				
Does this plan compare the environmental benefits of the CSO control alternatives?				
Is cost/performance information (including curves) for each of the CSO control alternatives provided?				
Do the cost/performance analyses evaluate a range of levels of controls that were developed based on the permittee's site specific conditions (e.g., zero overflow events per year, and averages of 1 to 3, 4 to 7, and 8 to 12 overflow events per year)?				
Does plan describe the approach used to screen the list of CSO control alternatives, including the recommended screening criteria?				
Do the screening criteria include performance factors, implementation and operation factors, such as costs, and environmental impacts (described in *Combined Sewer Overflows—Guidance for Long-Term Control Plan* [EPA, 1995a])?				
Evaluation Result (circle one)	**Adequate**	**Inadequate**	**Other**	

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
Selected CSO Controls				
Is the presumption or demonstration approach used?				
Does the plan identify the reasons for selecting certain CSO controls?				
Were reasons for rejecting specific CSO controls reasonable?				
Have the NMC been integrated into the permittee's description of its selected CSO controls?				
Will the selected CSO controls eliminate all CSO points to sensitive areas?				
If not, do the data support the permittee's conclusion that elimination is not physically possible or economically achievable?				
If CSO outfalls to sensitive areas remain: Will these CSOs receive treatment?				
Will the CSO controls be sufficient to provide for the attainment of WQS?				
Have control efforts for other point and nonpoint sources of pollutants within the watershed been considered?				
Will the CSO controls provide treatment or removal of floatables and settleable solids equivalent to that achieved by primary clarification?				
Is the mechanism for solids and floatables disposal described?				
Will the disinfection of effluent be necessary based on applicable WQS?				
If yes, is disinfection proposed as part of the CSO controls?				
If yes, will removal of harmful disinfection chemical residuals be necessary?				
If no, does the information support the conclusion that disinfection is not necessary?				

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
Do the selected CSO controls provide the maximum pollution reduction benefits reasonably attainable?				
Will the selected CSO controls provide for the attainment of WQS?				
If WQS cannot be met because of sources other than CSOs, has the permittee provided information on the other sources and natural background conditions?				
Are the selected CSO controls designed to allow cost-effective expansion or cost-effective retrofitting if additional controls are determined necessary to provide for the attainment of WQS?				
Has a TMDL been developed for the watershed?				
If so, has the permittee considered the TMDL in developing its LTCP?				
Evaluation Result (circle one)	**Adequate**	**Inadequate**	**Other**	

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
Implementation Schedule				
Do any phased construction schedules consider: Eliminating CSOs to sensitive areas?				
Use Impairment?				
Do any phased construction schedules include an analysis of financial capability?				
Did the permittee evaluate the following factors: Median household income?				
Total annual wastewater and CSO control costs per household as a percent of median household income?				
Overall net debt as a percent of full market property value?				
Property tax revenues as a percent of full market property value?				
Property tax collection rate?				
Unemployment?				
Bond rating?				
Did the permittee evaluate the following factors: Grant and loan availability?				
Previous and current residential, commercial, and industrial sewer user fees and rate structures?				
Other viable funding mechanisms and sources of financing?				
Does the schedule include milestones for all major implementation activities, including environmental reviews, siting of facilities, site acquisition, Army Corps of Engineers permitting, etc.?				
Evaluation Result (circle one)	**Adequate**	**Inadequate**	**Other**	

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
Post-Construction Compliance Monitoring				
Does the monitoring program include monitoring of CSOs that are representative of the impacts to receiving waters?				
Does the monitoring program include ambient receiving water body monitoring at representative CSOs, as well as monitoring prior to CSO impacts?				
Has the receiving water body monitoring program been coordinated with any ongoing or planned State programs and programs of other permittees within the same watershed?				
Does the monitoring program include any biological parameters (e.g., fish, zooplankton)?				
Does the monitoring program address pollutants included in the water quality criteria for the specific designated uses(s) of the receiving water, pollutants key to the attainment of the designated water use(s), and pollutants affected by the CSO controls?				

Suggested Long-Term Control Plan Evaluation Checklist

Evaluation Criteria	Yes	No	N/A	Remarks
Does the monitoring program include appropriate measures of success?				
Evaluation Result (circle one)	**Adequate**	**Inadequate**	**Other**	
Comprehensive Evaluation Result (circle one)	**Adequate**	**Inadequate**	**Other**	