



At a Glance

Why We Did This Review

We initiated this review to determine how selected municipalities are implementing actions, achieving milestones and achieving anticipated outcomes under the U.S. Environmental Protection Agency's (EPA's) stormwater enforcement initiative to address combined sewer overflows (CSOs). We also sought ways the EPA could improve the efficiency and effectiveness of its tracking efforts for this program.

The CSO program was intended to improve water quality through consent decrees with CSO communities. Based on EPA estimates, we calculate that consent decrees will eliminate at least 75 billion gallons of untreated CSO discharges each year and cost more than \$32 billion. The EPA anticipates these actions will aid in the achievement of water quality standards—the objective of the CSO policy.

This report addresses the following EPA goals or cross-agency strategies:

- *Protecting America's waters.*
- *Working to make a visible difference in communities.*

Send all inquiries to our public affairs office at (202) 566-2391 or visit www.epa.gov/oig.

The full report is at: www.epa.gov/oig/reports/2015/20150916-15-P-0280.pdf

EPA Needs to Track Whether Its Major Municipal Settlements for Combined Sewer Overflows Benefit Water Quality

What We Found

We found that some communities under consent decrees are meeting project milestones, and there is evidence that combined sewer overflows have been reduced. However, the EPA is not tracking and assessing results from consent decrees or determining whether the consent decrees are leading to desired water quality improvements.

Consent decrees involve significant financial investments from ratepayers. Consent decrees also require communities to collect information to demonstrate progress in achieving results, including pollution reduction and meeting water quality standards. The EPA could compile information on consent decree compliance to develop a national assessment and view of the overall progress of its CSO enforcement efforts. However, without such an assessment, it is unknown whether billions of dollars invested in CSO system changes and upgrades actually lead to the water quality improvements that the EPA anticipated, and reported to Congress and the public.

The EPA lacks a national tracking system that consistently monitors CSO consent decree results and improves oversight of the agency's regional tracking activities. The EPA also has not established an Annual Commitment System goal for regional consent decree tracking, which would allow EPA headquarters to incentivize consent decree tracking in regions. Further, the increased use of promising new technologies and public reporting can improve the efficiency of EPA oversight and its ability to demonstrate that associated water quality improvements result from the CSO program.

By tracking environmental results, the EPA can show how the \$32 billion that communities are spending to address discharges of untreated sewage and contaminated stormwater improves water quality.

Recommendations and Planned Agency Corrective Actions

We recommended that the Assistant Administrator for Enforcement and Compliance Assurance (OECA) develop and report outcome-based goals and measures for the CSO consent decrees; develop a national consent decree tracking system for regional and headquarters use; develop an Annual Commitment System goal that establishes regional goals for monitoring and reporting outcomes associated with CSO consent decrees; and provide a public website for CSO consent decree information.

After we received OECA's corrective action plan, outlined in its July 30, 2015, response to the draft report, we held several follow-up discussions with the office. Based on our meetings and OECA's supplemental information, the corrective action plan meets the intent of the report's recommendations. All recommendations are considered resolved.