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STATEMENT OF
HENRY ESCHWEGE, DIRECTOR
COMMUNITY AND ECONOMIC DEVELOPMENT DIVISION

BEFORE THE
SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT
HOUSE COMMITTEE ON
PUBLIC WORKS AND TRANSPORTATION
UNITED STATES HOUSE
OF REPRESENTATIVES
ON

OPERATION AND MAINTENANCE OF
PUBLICLY OWNED WASTEWATER TREATMENT PLANTS

MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE:

WE ARE HERE TODAY TO DISCUSS OUR NOVEMBER 14, 1980, REPORT TO THIS SUBCOMMITTEE ENTITLED "COSTLY WASTEWATER TREATMENT PLANTS FAIL TO PERFORM AS EXPECTED" (CED-81-9). DESPITE A FEDERAL INVESTMENT OF \$25 BILLION, PLUS SEVERAL BILLION MORE IN STATE AND LOCAL FUNDS, MANY PLANTS ARE NOT MEETING THE PERFORMANCE STANDARDS THEY WERE EXPECTED TO ACHIEVE. FAILURE TO MEET THESE STANDARDS MAY NOT ONLY HAVE AN ADVERSE IMPACT ON THE NATION'S ABILITY TO MEET ITS CLEAN WATER GOALS, BUT ALSO REPRESENTS THE POTENTIAL WASTE OF TENS OF MILLIONS OF DOLLARS IN FEDERAL, STATE, AND LOCAL FUNDS.

LET ME BRIEFLY PROVIDE SOME OVERALL BACKGROUND ON THE FEDERAL GOVERNMENT'S EFFORT TO CLEAN UP THE NATION'S WATER.

WHAT IS THE FEDERAL PROGRAM TO CLEAN UP OUR WATERS?

THE PRIMARY OBJECTIVE OF THE FEDERAL WATER POLLUTION CONTROL ACT, AS AMENDED IN 1972 (PUBLIC LAW 92-500), IS TO RESTORE AND MAINTAIN THE CHEMICAL, PHYSICAL, AND BIOLOGICAL INTEGRITY OF THE NATION'S

WATERS. THE ACT SETS TWO SPECIFIC NATIONAL GOALS. ONE GOAL, COMMONLY REFERRED TO AS "THE SWIMMABLE-FISHABLE" GOAL, IS TO RESTORE POLLUTED WATERS, WHEREVER ATTAINABLE, TO A QUALITY THAT ALLOWS FOR THE PROTECTION AND PROPAGATION OF FISH, SHELLFISH, AND WILDLIFE AND FOR RECREATION USE BY JULY 1983. THE OTHER GOAL IS TO ELIMINATE ALL DISCHARGES OF POLLUTANTS INTO THE NATION'S WATERS BY 1985.

THE ACT REQUIRES THAT, AS A MINIMUM, SECONDARY TREATMENT BE USED BY ALL PUBLICLY OWNED WASTEWATER TREATMENT PLANTS BY JULY 1, 1977, AND THAT BY JULY 1, 1983--WITH SOME EXCEPTIONS-- THESE TREATMENT PLANTS ARE TO USE THE BEST PRACTICABLE WASTE TREATMENT TECHNOLOGY AVAILABLE.

HOW WAS THE CLEAN WATER
OBJECTIVE TO BE ACHIEVED?

THE CONSTRUCTION OF WASTEWATER TREATMENT PLANTS IS THE PRINCIPAL MEANS BEING USED TO ACHIEVE THE NATION'S CLEAN WATER GOALS. THE WATER POLLUTION CONTROL ACT AMENDMENTS OF 1956 (PUBLIC LAW 84-660) CREATED THE WASTEWATER TREATMENT CONSTRUCTION GRANTS PROGRAM AND AUTHORIZED FEDERAL FINANCIAL ASSISTANCE OF UP TO 30 PERCENT OF THE COST FOR CONSTRUCTING MUNICIPAL WASTEWATER TREATMENT PLANTS. SUBSEQUENT AMENDMENTS INCREASED THE FEDERAL SHARE OF THE CONSTRUCTION COSTS TO 55 PERCENT. BETWEEN 1956 AND 1972, TOTAL FEDERAL EXPENDITURES FOR THE CONSTRUCTION GRANTS PROGRAM AMOUNTED TO \$5.2 BILLION. THE 1972 AMENDMENTS INCREASED THE FEDERAL CONTRIBUTION TO 75 PERCENT AND AUTHORIZED A TOTAL OF \$18 BILLION FOR THE CONSTRUCTION GRANTS PROGRAM. FINALLY, THE 1977 AMENDMENTS AUTHORIZED AN ADDITIONAL \$25.5 BILLION THROUGH FISCAL YEAR 1982. THEREFORE, SINCE 1972, A TOTAL OF \$43.5 BILLION HAS BEEN AUTHORIZED FOR THE PROGRAM, OF WHICH \$34 BILLION HAS BEEN APPROPRIATED.

TREATMENT PLANTS ARE CLASSIFIED AS EITHER PRIMARY, SECONDARY, OR ADVANCED DEPENDING UPON THE AMOUNT AND TYPE OF POLLUTANTS THEY ARE DESIGNED TO REMOVE. MOST OF THE PLANTS OPERATING AND PROPOSED FOR FUTURE CONSTRUCTION ARE SECONDARY TREATMENT PLANTS.

HOW IS THE PROGRAM TO BE MONITORED AND ENFORCED?

THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES), CREATED BY THE 1972 AMENDMENTS, IS THE PRINCIPAL TOOL USED IN THE WATER ENFORCEMENT PROGRAM. UNDER THE ACT, IT IS ILLEGAL TO DISCHARGE ANY POLLUTANT INTO THE NATION'S WATERWAYS WITHOUT A PERMIT. ANY VIOLATION OF THE PERMIT IS A VIOLATION OF THE LAW, AND THE VIOLATOR IS SUBJECT TO FINES, IMPRISONMENT, OR BOTH.

ALL POINT SOURCE DISCHARGERS, INCLUDING INDUSTRIAL TREATMENT PLANTS; MUNICIPAL TREATMENT PLANTS; CERTAIN AGRICULTURAL, FORESTRY, MINING, AND FISHING OPERATIONS; AND OTHER COMMERCIAL ACTIVITIES, ARE REQUIRED TO OBTAIN A PERMIT. THE SYSTEM IS ADMINISTERED BY EPA OR AN EPA-APPROVED STATE PROGRAM.

THE PERMIT SPECIFIES WHICH POLLUTANTS MAY BE DISCHARGED AND SETS DAILY AVERAGES AND MAXIMUM LIMITS ON DISCHARGES TO MEET EFFLUENT LIMITS AND WATER QUALITY STANDARDS.

FAILURE TO ACHIEVE TREATMENT LEVELS
MAY REPRESENT MILLIONS IN WASTED DOLLARS

WASTEWATER TREATMENT PLANTS ARE DESIGNED AND CONSTRUCTED TO REMOVE A PREDETERMINED AMOUNT OF THE POLLUTANTS CONTAINED IN RAW WASTEWATER. THE AMOUNT OF POLLUTANT TO BE REMOVED IS BASED ON THE AMOUNT OF POLLUTANT THAT CAN BE DISCHARGED TO THE RECEIVING WATER WITHOUT HAVING AN ADVERSE IMPACT ON THE WATERWAY'S DESIGNATED USE--SWIMMING, FISHING, DRINKING, ETC. FAILURE TO REMOVE THE

REQUIRED AMOUNT OF POLLUTANTS MAY MEAN NOT ONLY THAT THE WATER CANNOT BE USED AS INTENDED, BUT ALSO THAT FEDERAL, STATE, AND LOCAL GOVERNMENTS MAY HAVE WASTED TREMENDOUS AMOUNTS OF MONEY IF THE LEVEL OF TREATMENT PAID FOR IS NOT ACHIEVED.

HOW WELL ARE WASTEWATER
TREATMENT PLANS PERFORMING?

BECAUSE OF THE HUGE INVESTMENT OF PUBLIC FUNDS, AND THE RESULTS OF SEVERAL EPA STUDIES WHICH INDICATED THAT MANY OF THE TREATMENT PLANTS THROUGHOUT THE COUNTRY WERE NOT OPERATING PROPERLY, YOUR SUBCOMMITTEE ASKED GAO TO ANSWER THE FOLLOWING QUESTIONS:

- TO WHAT DEGREE ARE TREATMENT PLANTS PERFORMING AS EXPECTED? (THE SUBCOMMITTEE WANTED OVERALL STATISTICS ON PUBLICLY OWNED TREATMENT PLANTS THAT WERE NOT COMPLYING WITH THEIR NPDES PERMITS.)
- IF TREATMENT PLANT PERFORMANCE PROBLEMS EXIST, HOW GREAT AND SEVERE ARE THEY?
- WHAT ACTIONS HAVE EPA, STATES, AND MUNICIPALITIES TAKEN TO RESOLVE PLANT PERFORMANCE PROBLEMS?

TO ANSWER THESE QUESTIONS, WE ANALYZED FOR A 1-YEAR PERIOD THE MONTHLY DISCHARGE MONITORING REPORTS FOR 242 RANDOMLY SELECTED MAJOR WASTEWATER TREATMENT PLANTS LOCATED IN 10 STATES. THE MONTHLY REPORTS, PREPARED BY THE MUNICIPALITIES, SHOWED HOW EFFICIENT THE PLANTS WERE IN REMOVING POLLUTANTS FROM THE WASTEWATER. THE ACTUAL AMOUNT OF POLLUTANTS DISCHARGED COULD THEN BE COMPARED TO THE AMOUNTS ALLOWED BY THE PERMITS.

THE 242 MAJOR PLANTS WERE SELECTED FROM A UNIVERSE OF 676 FACILITIES CLASSIFIED BY EPA AND THE STATES AS MAJOR PLANTS HAVING SECONDARY TREATMENT CAPABILITY OR BETTER. A MAJOR MUNICIPAL

TREATMENT PLANT GENERALLY IS ONE WHERE THE QUANTITY OF WASTEWATER PASSING THROUGH THE PLANT IS 1 MILLION GALLONS A DAY OR GREATER.

WE FOUND THAT VIOLATION OF DISCHARGE PERMITS IS THE NORM RATHER THAN THE EXCEPTION. OUR SAMPLE OF 242 PLANTS SHOWED THAT 211, OR 87 PERCENT, EXPERIENCED AT LEAST 1 MONTH WHERE ONE OR MORE VIOLATIONS OF A PERMIT LIMIT OCCURRED. IN ADDITION, 119--OR 56 PERCENT--OF THE VIOLATING PLANTS EXCEEDED THEIR EFFLUENT DISCHARGE PERMIT LIMITS FOR MORE THAN HALF THE YEAR. MORE IMPORTANTLY, HOWEVER, WE CLASSIFIED 66, OR 31 PERCENT, OF THE 211 VIOLATING PLANTS AS BEING IN SERIOUS VIOLATION OF THEIR PERMITS. EPA'S OWN REPORTS OVER THE PAST SEVERAL YEARS ALSO SHOW THAT SOMEWHERE BETWEEN 50 AND 77 PERCENT OF THE PLANTS ARE, AT ANY GIVEN TIME, IN VIOLATION OF THEIR PERMITS.

WE RECOGNIZE THAT EPA CAN POINT TO MANY EXAMPLES OF WASTEWATER TREATMENT PLANTS THAT OPERATE AND PERFORM AS DESIGNED AND THAT HAVE DRAMATICALLY IMPROVED SEVERELY POLLUTED WATERWAYS. HOWEVER, THE STATISTICS CLEARLY SHOW THAT NUMEROUS PLANTS, IN WHICH BILLIONS OF DOLLARS HAVE BEEN INVESTED, ARE NOT TREATING WASTEWATER AT THE LEVELS THEY WERE EXPECTED TO ACHIEVE.

IT WAS NOT FEASIBLE TO RELATE PERMIT NONCOMPLIANCE DIRECTLY TO THE IMPACT ON WATER QUALITY. TO MAKE SUCH AN ANALYSIS, NUMEROUS VARIABLES WOULD HAVE TO BE MEASURED AND A CRITERIA FOR EACH WOULD HAVE TO BE ESTABLISHED. THESE VARIABLES INCLUDE

- A DETAILED KNOWLEDGE OF THE RECEIVING WATERS AT THE TIME OF THE PERMIT VIOLATION;
- THE NUMBER, TYPE, AND AMOUNT OF THE DISCHARGES FROM OTHER POINT SOURCES; AND

--THE EXTENT, TYPE, AND AMOUNT OF POLLUTANTS ENTERING THE RECEIVING WATERS ATTRIBUTABLE TO NONPOINT SOURCES OF POLLUTION.

THIS KIND OF INFORMATION, AS IT RELATES TO A GIVEN TREATMENT PLANT AND ITS RECEIVING WATERS, IS GENERALLY NOT AVAILABLE. IT CAN, HOWEVER, BE SAFELY ASSUMED THAT PERMIT NONCOMPLIANCE IS NOT BENEFITING RECEIVING WATERS AND MAY REPRESENT A WASTE OF FEDERAL MONEYS SPENT TO ACHIEVE A LEVEL OF TREATMENT NOT BEING REACHED.

WHY DO PLANTS HAVE OPERATIONAL PROBLEMS?

COLD STATISTICS DO NOT TELL US WHY PLANTS ARE NOT OPERATING AS INTENDED. TO ANSWER THIS QUESTION, WE REVIEWED 15 PLANTS EPA IDENTIFIED FOR US AS WORST-CASE SITUATIONS. WE AGREED TO SELECT WORST-CASE SITUATIONS TO FIND OUT WHY PERFORMANCE PROBLEMS EXISTED AND BECAUSE IT SEEMED THAT EPA AND THE STATES SHOULD BE GIVING THESE FACILITIES PRIORITY ATTENTION.

EACH OF THE 15 TREATMENT PLANTS REVIEWED HAD A COMBINATION OF PROBLEMS LIMITING THE PLANT'S ABILITY TO TREAT WASTE. THESE PROBLEMS CAN GENERALLY BE CATEGORIZED INTO ONE OR MORE OF THE FOLLOWING AREAS:

--DESIGN DEFICIENCIES. THE ACTUAL DESIGN OF THE PLANT WAS INADEQUATE. TANKS, PUMPS, PIPES, ETC., ARE TOO LARGE OR ARE NOT LARGE ENOUGH, AND THEREFORE THE PLANT IS UNABLE TO OPERATE AT AN ACCEPTABLE LEVEL TO MEET THE PERMIT CONDITIONS.

--EQUIPMENT DEFICIENCIES. ALTHOUGH EQUIPMENT PLACED INTO THE PLANT MAY HAVE MET THE MINIMUM DESIGN SPECIFICATIONS,

SUCH EQUIPMENT WAS DETERMINED, THROUGH ACTUAL OPERATIONS, TO BE INFERIOR IN PERFORMANCE, DURABILITY, AND RELIABILITY.

--INFILTRATION/INFLOW OVERLOADS. INFILTRATION IS GROUND WATER ENTERING A SEWER SYSTEM THROUGH DEFECTIVE SEWER PIPES, JOINTS, CONNECTIONS, OR MANHOLE WALLS. INFLOW IS WATER DISCHARGED INTO A SEWER SYSTEM FROM SOURCES SUCH AS CROSS CONNECTIONS FROM STORM SEWERS AND COMBINED SEWERS; MANHOLE COVERS; AND CELLARS, YARDS, AND FOUNDATION DRAINS. OVERLOADS PRODUCE MORE FLOW THAN THE PLANT CAN HANDLE SO THAT MUCH OF THE WASTE BYPASSES THE TREATMENT PROCESS.

--INDUSTRIAL WASTE OVERLOADS. WASTE FROM INDUSTRY THAT CONTAINS INCOMPATIBLE TOXICS AND/OR HIGH ORGANIC LOADS THAT ARE NOT COMPATIBLE WITH THE PLANT'S TREATMENT SYSTEM PROCESS.

--OPERATION AND MAINTENANCE DEFICIENCIES. INSUFFICIENT OR UNDERQUALIFIED STAFF, INADEQUATE BUDGETS, AND THE LACK OF OPERATOR TRAINING PROGRAMS ARE A FEW OF THE FACTORS IN THIS CATEGORY.

SOLVING A WASTEWATER TREATMENT PLANT'S PERFORMANCE PROBLEMS IS NOT AN EASY TASK. RESOLUTION OF THE PROBLEMS USUALLY REQUIRES A DETAILED STUDY BEFORE MODIFICATIONS ARE MADE. THESE ARE GENERALLY COSTLY AND OFTEN REQUIRE SUBSTANTIAL FEDERAL OR STATE FUNDS.

WHILE WE WOULD NOT EXPECT COMPLEX WASTEWATER TREATMENT PROBLEMS TO BE SOLVED IMMEDIATELY, WE WOULD EXPECT EPA, THE STATES, AND THE MUNICIPALITIES TO ACT MORE QUICKLY AND EFFECTIVELY TO BRING PLANTS INTO COMPLIANCE. AS IT IS, SERIOUS PERFORMANCE PROBLEMS HAVE EXISTED IN SOME CASES FOR OVER 8 YEARS. WE FOUND THAT:

--TECHNICAL ASSISTANCE PROVIDED BY EPA AND THE STATES IS LIMITED AND NOT EFFECTIVE IN RESOLVING PROBLEMS.

--ENFORCEMENT ACTIONS TAKEN BY EPA AND THE STATES AGAINST PERMIT VIOLATORS VARIED FROM NONE TO MINIMAL AND FOLLOWED NO CONSISTENT PATTERN.

--FUNDING REQUIRED FOR PLANT MODIFICATIONS WAS NOT READILY APPROVED OR AVAILABLE.

WE SEE NO SIMPLE SOLUTION TO THIS MULTIBILLION DOLLAR PROBLEM. HOWEVER, CONTINUING TO FUND CONSTRUCTION GRANTS IN THE PRESENT FASHION WILL ONLY PERPETUATE THE MAJOR PROBLEMS WE HAVE IDENTIFIED-- PAYING FOR CONSTRUCTION OF TREATMENT PLANTS WITH NO ASSURANCE THAT THEY WILL DO THE JOB.

WHEN A TREATMENT PLANT FAILS TO MEET PERFORMANCE EXPECTATIONS, THE CURRENT REGULATIONS REQUIRE THE MUNICIPALITY, AS THE GRANTEE, TO BE HELD RESPONSIBLE FOR MAKING THE NECESSARY CORRECTIONS. YET ALL TOO OFTEN THE GRANTEE IS THE ONE PARTY LEAST QUALIFIED. THE GRANTEES GENERALLY HAVE NEITHER THE EXPERTISE NOR THE TECHNICAL STAFF TO DEAL WITH SUCH DIVERSE, COMPLEX ISSUES AS THOSE WHICH SURROUND THE DESIGN, CONSTRUCTION, AND OPERATION OF WASTEWATER TREATMENT PLANTS.

THE QUESTION OF ACCOUNTABILITY AND/OR RESPONSIBILITY FOR FIXING WASTEWATER TREATMENT PLANTS THAT HAVE SELDOM OR NEVER PERFORMED AS EFFICIENTLY AS EXPECTED INVOLVES A TANGLED WEB OF CHARGES AND FINGER POINTING BY THE VARIOUS PARTIES INVOLVED, INCLUDING EPA, STATE, LOCAL, AND INDUSTRIAL OFFICIALS; DESIGN ENGINEERS; EQUIPMENT MANUFACTURERS; AND FINALLY, THE CONSTRUCTION CONTRACTORS AND SUBCONTRACTORS.

EVEN WHEN THE POTENTIAL EXISTS TO LEGALLY RESOLVE THESE QUESTIONS AND HOLD A PARTICULAR PARTY RESPONSIBLE FOR CORRECTING PLANT

PROBLEMS, EPA HAS NOT ENCOURAGED THE GRANTEEES TO TAKE ACTION OR BECOME LEGALLY INVOLVED. THE BOTTOM LINE GENERALLY READS: FEDERAL AND STATE GOVERNMENTS SPEND MILLIONS OF DOLLARS TO FIX THE SAME TREATMENT PLANTS THEY ORGINALLY SPENT MILLIONS TO CONSTRUCT.

WHAT CAN BE DONE?

ONE WAY TO IMPROVE THIS SITUATION WOULD BE TO CLEARLY SPECIFY WHO IS ACCOUNTABLE FOR ENSURING THAT THE PLANTS, ONCE CONSTRUCTED, WILL WORK AS INTENDED. THEN, IF DEFICIENCIES ARE NOTED IN A PLANT'S PERFORMANCE, THE ACCOUNTABLE PARTY WOULD BE REQUIRED TO CORRECT THEM AT ITS EXPENSE.

TO PINPOINT ACCOUNTABILITY VARIOUS ALTERNATIVES SHOULD BE CONSIDERED AND TESTED. FOR EXAMPLE:

- ONE KNOWLEDGEABLE PARTY, PREFERABLY THE ARCHITECT-ENGINEERING DESIGN FIRM, COULD BE HELD RESPONSIBLE UNDER CONTRACT FOR PLANNING, DESIGNING, AND CONSTRUCTING A TREATMENT PLANT AND FOR DEMONSTRATING THAT THE PLANT WILL MEET BOTH THE DESIGN CRITERIA AND THE DISCHARGE PERMIT REQUIREMENTS BEFORE TURNING THE PLANT OVER TO THE MUNICIPALITY FOR OPERATION. THIS IS KNOWN AS THE TURNKEY CONCEPT.
- EPA AND/OR THE STATES COULD ASSUME A FULL PARTNERSHIP ROLE WITH THE MUNICIPALITIES BY BECOMING A PARTY AND SIGNATORY TO THE VARIOUS CONTRACTS NEGOTIATED FOR THE PLANNING, DESIGN, AND CONSTRUCTION PHASES. CURRENTLY EPA AND STATE AGREEMENTS EXTEND ONLY TO THE GRANTEE. WITH A FULL VESTED INTEREST, EPA, THE STATES, AND THE MUNICIPALITIES SHOULD BE IN A STRONGER POSITION TO ENSURE THAT CONTRACTORS PERFORM AS THEY SHOULD.
- EPA AND/OR THE STATES COULD ASSUME AN ADVISORY ROLE TO THE GRANTEE. THIS ALTERNATIVE COULD BE USED IN CASES WHERE EPA

OR THE STATES BELIEVE THAT THE GRANTEE HAS THE NECESSARY STAFF AND EXPERTISE TO ENSURE CONTRACT PERFORMANCE.

WE RECOGNIZE THAT THERE ARE NUMEROUS OBSTACLES AND OPERATIONAL DETAILS THAT WOULD HAVE TO BE IDENTIFIED AND RESOLVED BEFORE ANY CONTRACT OR GRANT ALTERNATIVE COULD BE TESTED AND THAT SPECIFIC APPROVAL WOULD BE NEEDED FROM THE CONGRESS TO REQUIRE SUCH TESTS. YET WHAT IS CLEARLY NEEDED IS A METHOD FOR ASSURING THAT WASTEWATER TREATMENT PLANTS, ONCE CONSTRUCTED AND PAID FOR, WILL OPERATE AS INTENDED.

IN OUR REPORT, WE ALSO RECOMMENDED THAT THE CONGRESS REQUIRE THE EPA ADMINISTRATOR TO REPORT ANNUALLY THE EXTENT TO WHICH PLANTS FAIL TO MEET PERMIT CONDITIONS, THE PROGRESS BEING MADE TO RESOLVE THE PROBLEMS IDENTIFIED, AND WHO IS BEING HELD FINANCIALLY RESPONSIBLE FOR MAKING THE REPAIRS TO THE PLANTS (FEDERAL, STATE OR LOCAL GOVERNMENT).

EPA BASICALLY AGREED THAT THESE ARE SEVERE PROBLEMS AND NOTED THAT IT WAS CURRENTLY MAKING STUDIES UNDER ITS "1990 STRATEGY" DESIGNED TO IMPROVE THE SITUATION. EPA BELIEVED, HOWEVER, THAT ADDITIONAL REPORTING REQUIREMENTS WOULD BE TOO BURDENSOME ON THE STATES. WE POINTED OUT, HOWEVER, THAT THE TYPE OF INFORMATION TO BE FURNISHED TO THE CONGRESS SHOULD ALREADY BE AVAILABLE TO ALLOW EPA TO CARRY OUT ITS MONITORING ROLE.

CONCLUSIONS

KEEPING IN MIND THE NATION'S FISCAL CONSTRAINTS AND THE DESIRE FOR A CLEANER ENVIRONMENT, LET ME CONCLUDE THAT IT IS IMPERATIVE THAT OUR LIMITED DOLLARS BE USED AS EFFICIENTLY AS POSSIBLE. AS A NATION, WE SIMPLY CANNOT AFFORD THE LUXURY OF BUILDING WASTEWATER TREATMENT PLANTS THAT DO NOT WORK.

MR. CHAIRMAN, THIS COMPLETES MY PREPARED STATEMENT. WE SHALL BE GLAD TO RESPOND TO ANY QUESTIONS YOU OR OTHER MEMBERS OF THE COMMITTEE MAY HAVE.