Fact Sheet: Integrated Reporting (IR)— Improved Reporting for CWA Sections 303(d), 305(b) and 314

Required Reporting For States

The Clean Water Act (CWA) requires states, territories, and authorized tribes (collectively termed "states" in this fact sheet) to submit to EPA the following three reports on their waters:

- **Section 303(d)** by April 1 of all even numbered years, a list of impaired and threatened waters still requiring TMDLs; identification of the impairing pollutant(s); and priority ranking of these waters, including waters targeted for TMDL development within the next two years.
- **Section 305(b)** by April 1 of all even numbered years, a description of the water quality of all waters of the state (including rivers/streams, lakes, estuaries/oceans and wetlands). States may also include in the section 305(b) submittal a description of the nature and extent of groundwater quality.
- **Section 314** in each 305(b) submittal, an assessment of significant publicly owned lakes including extent of point and nonpoint source impacts due to toxics, conventional pollutants and acidification.

Recommended Integrated Report Format

Since the 2002 reporting cycle, EPA has encouraged states to prepare a single, Integrated Report that satisfies the reporting requirements above. EPA's recommended Integrated Reporting (IR) format (see IR guidance at http://www.epa.gov/owow/tmdl/guidance.html#2) reduces inefficiency, burden and redundancy in reporting requirements, and provides greater accountability on the status of all state monitored waters. In the IR guidance, EPA recommends the states use the following five reporting categories to report on the water guality status of all waters in their state:

Category	Description
1	All designated uses (DU) are supported, no use is threatened
2	Available data and/or information indicate that some, but not all of the DUs are supported
3	There is insufficient available data and/or information to make a DU support determination
4*	Available data and/or information indicate that at least one DU is not being supported or is threatened, but a TMDL is not needed
4a*	A TMDL is established
4b*	Other required control measures are expected to result in attainment of an applicable water quality standard in a reasonable period of time
4c*	Non-attainment of any applicable water quality standard is the result of pollution and is not caused by a pollutant
5*	Available data and/or information indicate that at least one DU is not being supported or is threatened, and a TMDL is needed
5m*	Non-attainment of any applicable water quality standard for mercury is the result of mainly atmospheric deposition sources and comprehensive mercury reduction programs are in place to address the impairment Waters in Category 4 and 5 are impaired or threatened; Category 5 represents the state's Section 303(d) list.

Progress through Integrated Reporting

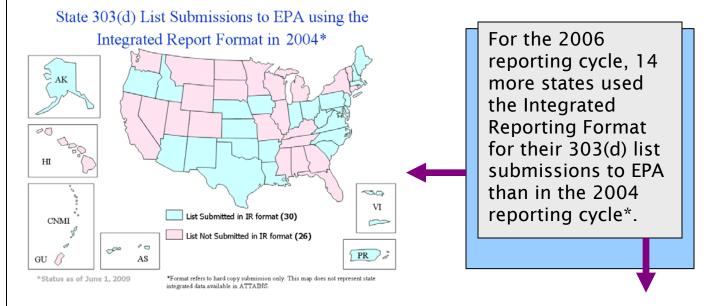
The five categories of the IR format provides greater accountability on the status of all monitored waters in a State, not just impaired or threatened waters. The streamlined IR approach also allows states to submit their reports in a timelier manner and helps EPA expeditiously review state 303(d) lists. However, states are not required to integrate their reports.

For the 2008 reporting cycle, more than 40 states have submitted Integrated Reports. EPA has been tracking the timeliness of state submissions and has seen over three times as many lists submitted by the April 1 deadline for the 2008 Reporting Cycle as compared to the 2006 Reporting Cycle. Additionally, EPA is tracking the time it takes to review state submissions and has seem dramatic improvements in the average number of days it takes to review a state's list.

It should be noted that states are sometimes unable to submit lists by the April 1 deadline for a number of reasons. Many times, states and EPA regional offices work together to address issues with listing decisions or assessment methodologies on draft 303(d) lists and these discussions are not resolved by the April 1 deadline. 303(d) reports also have to undergo a public review process, depending on the level of public involvement some states must spend considerable time reviewing and responding to public comments and concerns. States also have had difficulties in allocating staff resources to produce a 303(d) report or Integrated Report every two years. Similarly, the EPA review period may be drawn out due to requests for additional data, pending litigation or changes in water quality standards that prevent a list from being approved within the recommended 30 day time frame. Special circumstances may always arise, but nevertheless, the IR format has greatly improved timely state submission and EPA review.

States Using the Integrated Report Format

Below are several maps showing an increase in the number of states that use the recommended Integrated Report format from cycle to cycle during 2004, 2006 and 2008 (status as of June 1, 2009).



In the 2008 cycle, four additional states have thus far used the IR Format for their 303(d) list submissions to EPA compared with the 2006 reporting cycle*.

State 303(d) List Submissions to EPA using the Integrated Report Format in 2006*

UNI

List Submitted in IR format (44)

List Not Submitted in IR format (9)

Final list not yet submission only. This map does not represent state integrated data available in ATTAINS.

State 303(d) List Submissions to EPA using the Integrated Report Format in 2008*

List Submitted in IR format (43)

List Not Submitted in IR format (3)

Final list not yet submitted (10)

*Status as of June 1, 2009

*Format refers to hard copy submission only. This map does not represent state integrated data available in ATTAINS.

About the TMDL Program Results Analysis Project. The EPA Office of Water's National TMDL Program created the TMDL Program Results Analysis Project to assess the environmental outcomes and programmatic progress of the TMDL Program, analyze probable causes for these findings, and interpret the implications for potential program improvements. Analysis products include project reports, published papers, a Web site, and this fact sheet series. For more information please visit: http://www.epa.gov/owow/tmdl/results or contact the project leader at norton.douglas@epa.gov.

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