

REVISED GRANT APPLICATION  
AND WORK PLAN HANDBOOK  
FOR  
SECTION 208 AREAWIDE WATER QUALITY MANAGEMENT



ENVIRONMENTAL PROTECTION AGENCY  
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## PREFACE

This handbook is one of a series of handbooks designed to provide State and areawide agencies with additional assistance in carrying out the provisions of Section 208 of the Federal Water Pollution Control Act Amendments of 1972. This handbook provides specific assistance to designated areawide agencies who must prepare the grant application and work plan outline (in FY1976). It also provides assistance to the States who must review the areawide grant applications and work plan outlines before submitting them to EPA. Other handbooks in this series address area and agency designation, cost analysis, interim outputs and management agencies.

These handbooks are intended as supplements to the 208 Regulations, Guidelines and EPA Policy Statements published as program guidance (AM memoranda) by the Water Planning Division. The handbooks repeat or reference the regulations, guidelines and policies, and provide realistic examples to assist designated areawide agencies in preparing grant applications.

This handbook is a revised edition of the Work Plan Handbook for Section 208 Areawide Waste Treatment Management Planning (Feb. 1975). It now extends beyond initial work plan preparation guidance to include assistance in fulfilling other grant application requirements for designated areawide agencies. It additionally briefly discusses the requirements for refinement of work plans within twelve months of designation approval by the Regional Administration.

EPA reference documents useful in work plan and application preparation include the following:

- 40 CFR, Part 35; Grants to State and Designated Areawide Planning Agencies-- Conditions, Policies and Procedures
- 40 CFR, Part 130; Policies and Procedures for Continuing Planning Process
- 40 CFR, Part 131; Preparation of Water Quality Management Plans
- Guidelines for Areawide Waste Treatment Management Planning (August, 1975)

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Note

This document is not a replacement to the Act, the Regulations or official EPA Policy Statements. It is a supplement to these documents, showing hypothetical examples to assist designated areawide agencies in responding to 208 program requirements. The examples in this handbook do not constitute a uniform National EPA standard of acceptability. Any clarification and specific conditions applicable to a designated area should be discussed with the EPA Regional 208 Coordinator.

## INTRODUCTION

This handbook is designed to assist designated area-wide 208 agencies in the preparation of grant applications and in the refinement of work plans. It is also designed to assist States in their review of areawide grant applications. As a revised version of the February, 1975 work plan handbook, it incorporates and responds to recent modifications in EPA policy and regulations.

The handbook is divided into three parts: (1) Grant Application Requirements; (2) Outline of Work Plan; and (3) Refinement of Work Plan.

EPA recognized that preparation of a detailed work plan prior to a funding commitment could place time and resource limitations on work plan development. This situation often resulted in refinement of work plans after the grant award and a subsequent delay in actual planning start-up. In view of this, EPA Regulations, 40 CFR Part 35, now require an outline of the work plan at the time of grant application. In this stage, the work plan outline is a conceptualization of the activities, schedules, resources and procedures that the areawide planning agency will bring to bear in preparing the areawide plan. The areawide agency is then allowed up to one year from the date of their designation approval to submit a refined work plan. In addition, the areawide agency can apply for up to 5% of their total grant for work plan development.

The refined work plan should focus on precise output definition and prioritization. Given the limited time and resources available, 208 agencies must identify and concentrate on elements which can be implemented in the near term and contribute to the solution of water quality problems. Designated areawide agencies must also work closely with the State from the beginning of work plan preparation to avoid duplication of efforts and to insure integration into the State water quality management process.

Outputs should be defined in specific terms in the refined work plan. This includes indication of level of detail, accuracy and analytical confidence. Detailed

scheduling and budgeting as well as the relationship between tasks should be clearly shown. The refined work plan should act as a blueprint for the two-year planning period; the 208 planning agency should be able to use the refined work plan to arrange and direct their planning process on a day-to-day basis.

A note of caution is in order at this time. Although agencies will be given time to refine their work plans before the planning period begins, the work plan outline to be submitted with the grant application must provide an initial framework for development, operation and management of the planning process. It should represent a clear understanding of the relationship between the planning agency and the State. It should also present EPA with a clear indication of program direction and a sound basis for making a grant decision.

## **1. GRANT APPLICATION REQUIREMENTS**

This Chapter outlines 208 grant application requirements found in 40 CFR, Part 35.208. All conditions must be fulfilled before grants can be awarded. Careful preparation of necessary submissions will expedite prompt EPA decision on the application.

### **A. Official EPA Forms for 208 Grant Application**

The Application Kit for Grant opens with a ten-page EPA Form 5700-33 (5-74). This form is also referred to by the Office of Management and Budget approval notice, OMB NO. 158-R0110. The example on the opposite page is the first page of this ten-page form. These forms must be completed as appropriate and reviewed with the grant application.

Form Approved  
OMB No. 158-R0110

EPA Form 5700-33 (5-74)



## **I. GRANT APPLICATION REQUIREMENTS (continued)**

### **B. OMB Circular A-95 Requirements**

OMB Circular A-95 establishes rules and regulations governing the formulation, evaluation, and review of Federal programs and projects having a significant impact on area and community development, including programs providing Federal assistance to States and localities. A network of State and areawide planning and development clearinghouses has been established to aid in the coordination of this review.

EPA regulations 40CFR Part 35 require compliance with applicable portions of the A-95 review process. These portions are contained in Part I and Part IV of the A-95 Circular. Part I of this Circular refers to the notification and review system. Review of the grant application by the clearinghouse establishes contact in the areawide 208 planning process between the designated planning agency and other governmental units in furthering intergovernmental coordination and review of the areawide 208 plans.

The areawide 208 planning agency must notify the State and areawide planning and development clearinghouse in the jurisdiction of the planning area of its intent to apply for planning assistance. The grant application should satisfy the summary information required in the notification including: geographic location, description of work, environmental considerations, title of Federal program providing assistance, and the date of formal application.

Part IV of this Circular refers to coordination of planning in multijurisdictional areas. The objectives of this part include the encouragement of effective use of resources, minimizing inconsistencies, and eliminating duplication in local planning activities. This coordination can be helpful in precluding the funding of other projects that may conflict with the 208 areawide plan.

The planning agency response to this requirement, as shown in the accompanying example, is a statement from the A-95 Clearinghouse Agency(s) acknowledging review of the grant application and recommending its approval by EPA.

If the 208 planning agency is also the regional A-95 clearinghouse, then only State A-95 clearinghouse review is necessary.

# EXAMPLE

TO: Mr. John Green, Regional Administrator  
Environmental Protection Agency

FROM: State A-95 Clearinghouse

SUBJECT: A-95 Review Comments  
Section 208 Water Quality Management  
Grant Application from the Harbor  
Area Council of Governments,  
Designated Agency

The State A-95 Clearinghouse has reviewed the above noted application and finds it consistent with regional plans. It wishes to submit favorable review comments on this proposal and recommends its favorable and expeditious review by the EPA as a matter of high regional concern.

Prior to the June 12 meeting, at which the project was reviewed, conferences were held, or written and verbal communications were had, with the following staff personnel:

City of Collingswood	Planning Director Waste Water Division Director of Public Works City Manager's Office
Tuller County	Planning Director Administrative Assistant Hydrologist
City and County Health Department	Director of Environmental Health
Town of Woodland Park	Town Manager
Teller County	Administrative Assistant
City of Fountain	Town Clerk
City of Manitou Springs	City Manager

From these conferences and communications no adverse comments were received, either verbally or in writing.

## 1. GRANT APPLICATION REQUIREMENTS (continued)

### C. Policy Advisory Committee

Each 208 areawide agency must provide for meaningful intergovernmental input in the 208 planning process. An outline of the methods and operating procedures for disseminating information and incorporating input into decisions should be included in the grant application.

The primary mechanisms and minimum requirement for intergovernmental input is the Policy Advisory Committee. The Policy Advisory Committee should facilitate cooperation between areawide water quality planning and related Federal, State and local planning programs. The Committee must include representatives of the State(s) and the public. It may also include representatives of the Department of Agriculture, Department of Interior and other Federal or local agencies that can contribute to the areawide planning process.

Existing Policy Advisory Committees that meet these criteria should be used wherever possible. The grant application should indicate:

- the name of the committee
- its composition including the name of member agencies
- the anticipated frequency of meetings or schedules of meetings related to key milestones in the planning process
- the function of the committee
- the organizational location of the committee with respect to the planning agency.

In politically complex areas where a policy advisory committee cannot include all groups which should have inputs into the planning process, other existing forums or special 208 technical advisory committees should also be used to include those not formally included in the policy advisory committee.

Areawide Planning Advisory Committee

An Areawide Planning Advisory Committee has been created in conformance with the 208 program requirements. As stated in these requirements, the public and Federal and State agencies must also be given the opportunity to participate; thus, the following agencies have agreed to become actively involved in the planning process through the Advisory Committee:

Federal: U.S. Department of Agriculture-Soil Conservation Service  
U.S. Army- Corps of Engineers  
U.S. Department of Interior-Bureau of Outdoor Recreation  
National Park Service

State: State Water Control Board  
State Health Department  
Division of State Planning & Community Affairs

Local: Regional Planning Agency  
County Sanitation Department

Public: Metro League of Women Voters  
Chamber of Commerce

The functions of the Committee include: approving public coordination and information programs, providing overall policy decision making inputs, assisting in identifying major problem areas and primary alternatives, reviewing alternative recommendations and projections, advising on data acquisition programs, reviewing major milestones, and reviewing inputs from related programs (e.g., land use plans).

The Committee will report directly to the Director of the 208 Regional Planning Agency. It will meet monthly during the first year of the planning period to review initial policy alternatives and control strategies. Thereafter, the Committee will meet quarterly. The quarterly meetings will coincide with the progress reports submitted to EPA and will provide the Committee with planning progress for their review.

## **I. GRANT APPLICATION REQUIREMENTS (continued)**

### **B. Relationships with Other Programs**

The grant application must provide evidence that the proposed planning process takes into account the relationships with affected State, local, Federal programs and with other applicable resource and developmental planning programs. The basic areas of coordination are: (1) State Water Quality Management Planning; (2) 201 facilities planning; and (3) other environmental activities.

#### **1. State Water Quality Management Planning**

Coordination with the State is absolutely essential to the required integration of the areawide and State water quality management processes. The grant application should indicate how the designated areawide 208 agency will assure that its plans will proceed in a timely manner and be coordinated with water quality management planning developed by the State. It should also indicate those key decision points at which the State enters the 208 areawide water quality management process.

# EXAMPLE

## Coordination with State Water Quality Management Planning

The following liaison tasks, are considered to be State responsibilities in the designated areawide water quality management process and will be specifically identified in a contract with the State to be prepared during preparation of the final work plan:

### 1. Program Assistance

- Information on State requirements, regulations and guidelines
- Review of planning process
- Definition of new or revised State legislation

### 2. Technical Assistance

- Information on water quality standards
- Information on waste load allocations
- Information on permit conditions
- Information on water quality data
- Information on facilities planning

### 3. Coordination

- with State water quality management planning process
- with Phase I Water Quality Management plans
- with other environmental laws
- with other State resource programs
- with contiguous areawide planning activities
- with advisory committee

### 4. Review and Certification

- refined work plan
- milestones and interim reports
- final plan

In addition to these responsibilities, there are many other tasks which could be incorporated into the contract on a case by case basis depending on our needs and the State's availability.

1. GRANT APPLICATION REQUIREMENTS (continued)

D. Relationships with other Programs

2. Coordination with 201 Facilities Planning

Coordination with Section 201 facilities planning requires particular attention in the areawide 208 planning process. Since 201 and 208 planning programs have a number of similar requirements, particularly in reference to description and selection of service areas and treatment systems, there is a great opportunity for overlap and conflict between these planning efforts unless they are carefully monitored and coordinated.

EPA Program Guidance Memorandum, AM-2, dated March 21, 1975, contains a detailed discussion on the relationship between 208 Areawide and 201 Facilities Planning Programs. The current policy generally recognizes the controlling nature of an approved 208 plan and specifies that facility planning presently underway is expected to be accepted and incorporated into the 208 plan that is being developed.

Coordination with 201 Planning

It is the policy of this agency that 201 facilities planning should be carried out with 201 funds wherever possible, but that a maximum effort be made to insure coordination between two separately funded but potentially duplicative planning programs.

A. In those communities where an adequate 201 plan has been completed or is substantially underway, the 208 plan will assume the plan as a given, or fixed alternative. This will apply to the following communities: Springdale, Acton, Somerset, Parker City.

B. In those communities in which Step I 201 planning will take place during the 208 planning period, a memorandum of understanding will be negotiated between the State, the 201 planning agency, and the areawide planning agency, in order to insure that common tasks are not performed twice, and to coordinate the use of assumptions on population and economic projections, land use, wastewater generation, etc. The following communities will be doing (or are likely to do) Step I 201 planning over the next 2 years: Tallis, Richmond, Danville, Plainfield.

C. In those communities where Step I planning is not likely to start during the 208 period, the areawide plan will set the parameters for subsequent 201 planning.



I. GRANT APPLICATION REQUIREMENTS (continued)

D. Relationships with Other Programs

3. Other Environmental Activities

The areawide planning process must take into consideration other planning activities that may influence the water quality environment of the area. The grant application should identify proposed coordination of the 208 planning effort with other planning activities, including:

State and local land use and development plans	HUD 701-Water, Sewer and Flood Insurance plans
River Basin plans	Areawide Transportation plans
Air Quality Maintenance Area planning	State Coastal Zone Management plans
Solid Waste Management plans	COE-Urban Studies Program
Water Supply Planning	USDA-Forest Service and Soil Conservation Service
	Historic District planning

The coordination with these activities should include the proposed use of (1) consistent data bases, including growth projections (2) complimentary strategies (3) periodic 208 areawide plan reviews by other agencies to meet their environmental or environmentally related objectives, and (4) periodic reviews of other areas' planning activities to ensure the consideration of their impact on water quality.

The response to coordination requirements, shown in the accompanying example, should list the specific steps that are planned to accomplish the coordination between the 208 areawide planning and other environmentally related planning efforts.

### Statement of Coordination with Other Environmental Plans

The proposed planning process and work plan outline accounts for previous environmental planning, as well as the coordination with ongoing efforts. The planning agency pledges its support of a coordinated planning program, which will account for, at minimum, the following major environmental planning/study efforts affecting the 208 Area:

<u>Study Title</u>	<u>Lead Agency</u>
Jones River Basin Study	State Water Control Board
NPDES Permit Studies	State Water Control Board
Coastal Zone Management Study	Division of State Planning and Community Affairs
Water Quality Monitoring Program	State Water Control Board
Jones River Basin Study	Corps of Engineers
Norma River Basin Study	State Water Quality Agency
Area Transportation Plan	Department of Highways
Air Quality Maintenance Area Studies	State Air Pollution Control Board
Regional Comprehensive Planning Programs	Peninsula Planning District

The lead agencies coordinate their efforts with applicable Federal agencies (e.g., Div. of State Planning and Community Affairs with NOAA on Coastal Zone Management).

The river basin studies will provide the inputs for revisions to the waste load allocations and the area's water quality standards. The permit study will support the point source control strategy alternatives with information on the effluent loads of major point sources. The monitoring program will help establish the feedback mechanism to evaluate control actions. Coordination with air pollution plans will establish consistent projections for growth to meet both air and water standards. Coastal zone and regional plans will be used as basic land use inputs to determine patterns of development and projections of land use.

I. GRANT APPLICATION REQUIREMENTS (continued)

E. Continuing Planning

1. Financially Self-Sustaining Process
2. Annual Updates

The 208 program requirements call for a statement to be included in the grant application which indicates that the continuing planning process, after the initial preparation and approval of an areawide plan, will be financially self-sustaining. The grant application should indicate the mechanisms to achieve this goal.

The approved plan must be reviewed and updated annually. If substantial revisions result, the entire planning report should be revised accordingly. Relatively minor revisions resulting from such an update can be documented in an addendum to the initial report. The continuing planning may be performed by a planning staff attached to the designated management agency(s) or by the designated planning agency in coordination with the management agency(s). The applicable organizational structure must be documented in the final plan along with the financial arrangements to pay for the continuing planning process.

Some of the financial mechanisms to be considered are:

- funding contributions of member agency or government units
- general revenue funds allocated to planning and related activities
- user charges for waste treatment facilities
- general obligation bonds

A brief discussion of the funding mechanisms to be considered, as shown in the accompanying example, should emphasize the intent of the planning agency to accomplish a financially self-sustaining planning effort.

## Continuing Planning

In support of the continuing areawide planning by the COG, both of the Planning District Commissions in the 208 area pursue programs of comprehensive planning for their respective sub-regions, under the authority of the State Area Development Act. This Act requires the maintenance of continuing process by each Commission established under the Act. The funds for this planning effort are established by charter agreement among the participating units of local government in each sub-region. The Sanitation District also carries out a number of elements of the continuing planning program, particularly in the areas of water quality monitoring to supplement State data, special problem studies, and on-going facilities planning and design. The funds for operation of these functions come from the normal user revenues generated by the District services.

The COG budget is also supported by grants from State and Federal agencies, but approximately 50% of the budget is provided by local member contributions. This local contribution can be used to fund continuing planning process. During the preparation of the plan, a number of management alternatives will be examined. The chosen management scheme will address the question of continued funding of the planning process (e.g., industrial user charges).

The annual update of the plan will be performed by the COG in conjunction with the selected management agency or agencies. The effectiveness of the update will depend on the evaluation and monitoring tools developed as part of the plan. Changes in land use and socio-economic parameters, together with appropriate water quality and facility variables, will be used in the update and a public hearing will be held prior to adoption of the updated plan.

The COG recognizes the need for financing the basic elements of a continuing planning process and pledges to cooperatively pursue the establishment of such financing for the 208 program.

## I. GRANT APPLICATION REQUIREMENTS (continued)

### F. Outline of Work Plan

The bulk of the 208 grant application package consists of the work plan outline wherein the applicant describes the activities, schedules, resources and procedures it will bring to bear in preparing the areawide plan. Although this work plan will be refined during a period of up to one year from the date of the Regional Administrator's approval of the designation, the outlined work plan should not be undertaken as a simple exercise to complete the grant application process. Rather, it should represent a carefully prepared conceptualization of 208 planning for the designated area. It should be developed in sufficient detail to provide the State and EPA with a clear indication of the proposed project's direction and to enable the State and EPA to adequately evaluate the proposed grant request.

Explanations and examples of required work plan outline elements are presented in Chapter II.

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1. GRANT APPLICATION REQUIREMENTS (continued)  
G. State Certification

The State certification is intended to assure EPA that the grant application and work plan outline have been coordinated between the designated planning agency and the State. In their review, the State should pay particular attention to all State requirements that may be applicable to the activities proposed in the application and the work plan outline, including relationship with the State river basin plans and other State water resource and water quality requirements. The State certification should acknowledge:

- The technical and procedural adequacy of the work plan outline to accomplish the objectives of the 208 areawide planning. The determination of adequacy should evaluate if the work plan outline includes such things as sufficient technical staff, awareness of major problems, sufficient public participation, and consideration of alternative solutions.
- The assurance that the work plan outline activities do not duplicate past or existing water quality management activities, including facility planning activities.
- The actual State recommendation that the grant application and work plan outline should be approved by EPA.

Although only the positive aspects of the State certification have been listed, the certification could indicate that the State does not recommend the work plan for approval by EPA. Reasons for the disapproval should be provided.

The State response should be a brief statement similar to the accompanying example. This statement is the acknowledgement of the State review and its summary findings as to approval or disapproval of the grant application and work plan outline.

Regional Administrator  
U.S. Environmental Protection Agency, Region III  
Curtis Building  
6th & Walnut Streets  
Philadelphia, Pennsylvania 19106

Dear Sir:

I have reviewed the Warden County application for a grant under Section 208 of the Federal Water Pollution Control Act, and find:

- (i) that the proposed work complies with all State requirements, including the applicable 303(e) plan prepared under 40 CFR Part 131;
- (ii) that the proposed planning work program is adequate and necessary to accomplish the development of a plan under Section 208;
- (iii) that, insofar as is known, the planning will not duplicate any work which has been done or is being done to meet the facilities planning requirements of Sections 35.917-35.917-9 of 40 CFR, Part 35.
- (iv) that the State certifies that the grant application should be approved by EPA.

Sincerely yours,



R. Smith, Director  
Environmental Control  
State of Delaware  
Dover, Delaware



## **II. WORK PLAN OUTLINE**

EPA Regulations 40CFR Part 35.208-2 require an outline of work plan which will be submitted pursuant to 40CFR 35.220.

The following material covers what must be submitted in a work plan outline based on the content requirements of the final work plan (40CFR 35.220).

### **A. Work Performed to Date**

The work plan outline should include a list of previous or on-going work and results that will be available to the planning process. For most metropolitan areas a wide variety of related planning work, data, and pertinent information has been gathered and would prove useful to the 208 areawide planning. These related activities should include those of local government units, State governments, agencies and commissions, and Federal or Federally sponsored activities. Of particular interest is information from completed and on-going basin planning, facilities planning, and Corp of Engineers Urban Studies.

The work plan outline response, as shown in the example, is a list of activities, report titles, maps, computer programs or files, etc. Included is a brief statement on the work content. If relevant studies exist in the area but are not to be used in the areawide plan, this should be noted with a justification for not using the information. During the refinement of the work plan, this list should be revised as more existing planning information becomes available to the designated areawide agency.

## Work Performed to Date

Several plans and studies have been prepared or are in preparation by RCOG and other agencies that will be used as input to the 208 planning effort. Included in these are the following items:

- (a) The 1990 Regional Sewer Plan by the Valley Sanitary Sewer Commission is adopted but is in need of updating and major expansion and revision. It will be used as a source document for land-use inputs and facility plans.
- (b) The Interim Water Quality Management Plan by RCOG is based on the regional plan and will be used as a source document for the revision of waste load allocations and the standard setting process.
- (c) The 1990 Regional Land Use Plan by the County Planning Board is the basis for all functional elements in that it provides land use and population estimates and forecasts. This plan is now undergoing major revisions. It will be used as the major source of area growth patterns.
- (d) Current Population Estimates (1974) by the State Department of Water Resources will be used as the population source document for estimates of municipal facility reviews.
- (e) Alternative Population and Employment Forecasts by the Department of Labor will be used as the source document for control totals on future major employment sectors and population (by age and sex). It will be used as an input to regional economic forecasts.
- (f) Housing Market Analysis (1974) by RCOG is the source document for current housing stock and control totals for future housing demand (by type of units). It will be used as a source of sewer service projections.
- (g) Facility Plans (1974) by the Sanitary Sewer Commission are currently in the planning phase at Store Point and Wilkes. The data collected for these studies will be incorporated in the areawide plan.
- (h) On-going studies describing the natural environment and policies for the preservation thereof include the Moment, Fountain, Sand and Jimmy Camp Creeks Flood Plain analyses, the reports on land capability and ecology prepared by RCOG, the various maps and unpublished work on soils, topography, drainage basins, developing areas, etc.

In addition, the following information will be obtained from several levels of local and State governments:

- State monitoring programs
- Current 303(e) plans
- Results from permit applications
- Development information from communities including zoning laws, land use plans, sewerage maps, etc.

## **II. WORK PLAN OUTLINE (continued)**

### **B. Proposed Planning Process**

The second part of the work plan outline is a description of the proposed planning process developed pursuant to 40CFR Part 130.10. This section of the Regulations specifies that a planning process must include: (1) public participation; (2) adequate intergovernmental inputs; (3) coordination with other planning activities; (4) preparation, adoption, and revision of Water Quality Management plans; and (5) the establishment and implementation of regulatory programs.

Previously discussed requirements of the grant application submission address items 2 and 3 above (see Section I of this Handbook). Thus, the work plan outline should address items 1, 4, and 5. These requirements may be satisfied by submitting the following information in the work plan outline:

- Objectives of the Planning Process
- Proposed Outputs of the Planning Process
- Proposed Public Participation Programs

#### **1. Objectives of the Planning Process**

The aim of the planning process is to formulate an areawide water quality management plan that can be implemented. The planning process must integrate technical means for pollution control with management arrangements capable of implementing the controls, and provide for public participation in plan development. The overall objective is to establish continuing institutional arrangements for decision making and management aimed at achieving water quality goals and standards. More specifically:

- The planning agency must coordinate with State water quality management planning and other planning programs in identifying and evaluating feasible measures to control point and nonpoint sources of pollution.

- Individual programs must be directed at standards that incorporate 1983 goals of this Act and desires of the public.

- Planning efforts should be placed in priority, stressing the most serious water quality problems and most institutionally feasible controls. Those problems for which there are no, or only limited, feasible solutions should be given lower planning priority. Non-structural solutions should be considered wherever possible.

- Interim planning outputs, especially those related to continuing municipal treatment works construction, should be singled out for early completion.

- Management analysis should start early in the process to insure adequate time to develop and implement a plan.

EPA has published water quality criteria information under Section 304(a) of the Act for the establishment of State water quality standards. The criteria generally represent minimum acceptable levels of water quality for related uses, unless local circumstances are shown to support less restrictive criteria for specific parameters. Exceptions to the 1983 water quality goal of swimmable and fishable waters may be allowed under either: (i) naturally occurring conditions, (ii) mutually conflicting uses of the waters or (iii) technological infeasibility.

Antidegradation statements included in present standards provide that no degradation of high quality waters will be allowed except to allow necessary and justifiable economic and social development. The objectives of the 208 areawide plan should take into consideration the State's policy and strategy for anti-degradation. For high quality waters, the State has the opportunity to determine whether to allow degradation down to the 1983 goal or to provide for more stringent levels of protection, up to no discharge, in order to protect present quality. Alternatively, the State may choose to allow degradation of waters with a water quality level presently above the 1983 goal. In no instance, however, is the water quality to be degraded to a level where the 1983 goal is no longer sustainable. The State's planning process, in coordination with the local planning agencies, will be the basis for applying these guidelines to individual bodies of water.

Objectives of the Planning Process

COG: The following objectives have been adopted by the

- Coordinate with State water quality management planning and other planning activities
- Encourage public participation in decision making
- Develop regulatory programs to prevent and control point and nonpoint sources of pollution
- Develop a management system for continued environmental decision making and management
- Set those arrangements into operation by the end of the planning period
- Establish self-sustaining funding for continued environmental planning and management.

More specifically, the COG will address these objectives with the following program elements.

1. Water Quality Standards. The COG will furnish the public with information as to the types of actions or controls and the technical feasibility of achieving these standards. It will consult with the State and with the public to determine the locally desired uses of waters. After this consultation, the COG will represent the area in the standard setting process with the State. This activity has been given high priority.
2. Municipal Facilities. The COG, in consultation with operational agencies and local governments, will determine service areas for municipal treatment priorities. Since 3 construction grants are needed prior to June of 1976, specific sub-priorities have been developed for this program.

3. Waste Load Allocations. The COG has agreed to work with the State to obtain revisions, based on the tentative standards, to provide waste load allocations for all sources. Revised allocations are planned for April 1977.
4. Pretreatment Regulations. The COG and the operating agencies will jointly develop a set of pretreatment requirements in coordination with EPA's pretreatment regulations, and a program to carry out those requirements. This program is to be completed by the Spring of 1977.
5. Land-Use. In view of the rapid growth of the fringe area, the COG believes that particular emphasis must be placed on (i) developing additional land development controls to guide subdivisions and to minimize the storm drainage problem; (ii) determining preliminary routing, sizing and timing of major sewer interceptors; and (iii) updating land use plans to determine sewer interceptors and treatment facility requirements for each subarea.
6. Nonpoint Sources. The COG does not anticipate any work on silviculture, mining, or salt water intrusion since these problems are not encountered in the area nor will it formulate strategies for regulating construction activities since the State is instituting a Statewide control program. After consultation with the State, it has been decided that a program controlling urban runoff and runoff from solid waste disposal sites will be completed during the planning period. The COG will collect sufficient data to determine the magnitude of the remaining nonpoint source problems and their possible solutions. The schedule for further nonpoint source work will be determined jointly with the State Water Pollution Control Administration.

7. Preservation and Protection. The COG is mindful of the streams in the area that presently have water quality above the 1983 goal for "swimmable and fishable" waters. In order to preserve and protect these waters, the COG will include in its planning efforts the investigation of zoning which permits no discharges into those streams, the allowance of additional discharges provided they are equal to the quality of the water, and the provision of growth up to an established maximum stream load.

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## II. WORK PLAN OUTLINE (continued)

### B. Proposed Planning Process

#### 2. Proposed Outputs of the Planning Process

The specific outputs of the planning process should relate directly to the water quality objectives of the area, the institutional setting and the particular pollution problems encountered in the area. In addition, close coordination with the State water quality planning office must be maintained to insure that the areawide 208 plan meets State requirements and can be incorporated into the State water quality management process.

Individual areawide 208 plans will not be uniform in nature, but tailored to each area's needs and problems. After assessing water quality objectives, available means for reaching those objectives, and the likelihood of support and implementation, the local agency should set realistic priorities for the solution of the most significant water quality problems. EPA policy encourages concentration on key problem areas.

Recognizing that problems, priorities, and State/local agreements will vary from place to place, 208 area-wide plan outputs shall include consideration of the following elements:

1. planning boundaries
2. water quality assessment and segment classification
3. inventories and projections
4. nonpoint assessment
5. water quality standards
6. total maximum daily loads\*
7. point source load allocations\*
8. municipal waste treatment systems needs
9. industrial waste treatment systems needs
10. nonpoint source control needs
11. residual waste control and land disposal needs
12. urban and industrial storm water needs
13. target abatement dates
14. regulatory programs
15. management agencies
16. environmental, social, economic impacts

A list of suggested outputs associated with each of these elements is presented in the following example. The local agency in agreement with the State may use this list in selecting and further defining the proposed outputs. The list of outputs should be in sufficient detail to help determine the program budget and present a clear indication of program direction.

\* These items will not be determined by designated areawide planning agencies unless the State has delegated such responsibilities to the designated agency. Where such delegation has not taken place the State shall determine these items for the designated planning agency.

## Analytical Steps and Planning Outputs

1. Working maps indicating
  - a. the designated areawide planning district
  - b. state identified areas in need of municipal facilities planning
  - c. water quality and effluent limited segments
  - d. all significant dischargers
  - e. fixed monitoring stations
2. Water quality assessment and segment classification considering
  - a. all existing and potential sources of pollution
  - b. upstream sources of pollution
  - c. in-stream water quality
  - d. specific water quality parameters needed in the maximum daily load allocation process.
3. Demographic and economic inventories and projections with
  - a. a ranked list of municipal and industrial polluters
  - b. a summary of existing land uses
  - c. disaggregated 20-year growth projections
  - d. projected municipal and industrial wasteloads
  - e. projected land use patterns
4. Nonpoint source assessment including
  - a. description of problems, sources and segments affected
  - b. identification of sources outside the designated area
5. Revision of water quality standards
6. Maximum allowable pollution loads and thermal limits for each water quality criterion being violated or expected to be violated over the next 20 years taking into account
  - a. applicable water quality standards
  - b. seasonal variations
  - c. dissipative capacity of water
  - d. margin of safety given limited knowledge of some problem
  - e. potential growth

(a description of all mathematical models used will be furnished)

## EXAMPLE

7. Point source allocations for each pollutant by water quality segment over the 5-year planning period, taking into account
  - a. total allocation for the 5-year period
  - b. anticipated growth
  - c. NPDES permitting process
8. Analysis of municipal waste treatment systems needs by 5-year increments over a 20-year period including discussion of
  - a. load reductions necessary to attain water quality standards and effluent limitations
  - b. population to be served
  - c. cost and availability of land
  - d. results of Step I and II planning underway
9. Calculation of industrial waste treatment system needs including
  - a. anticipated industrial point source wasteload reductions needed to meet standards
  - b. consideration of alternatives to municipal treatment of industrial sources
10. Nonpoint source analysis of pollutants to be considered under the State/EPA agreement including
  - a. identification of all best management practice measures necessary to control problems
  - b. evaluation of those measures in terms of past history of use, time needed to establish them, regulatory programs to achieve them, management program to administer them and cost of the program by 5-year increments
11. Residual waste and land disposal needs including
  - a. specification of control measures needed, and
  - b. a control implementation strategy
12. Analysis of urban and industrial storm water system needs, controls and costs for
  - a. existing urban and industrial storm water systems
  - b. future service areas anticipated over the next 20 years

## EXAMPLE

13. Target abatement dates for all major sources of pollution including
  - a. interim and final completion dates
  - b. specifications for a tracking system
14. Outline of regulatory programs including
  - a. description of existing controls to be utilized
  - b. description of necessary additional controls and method of obtaining them
15. Specification of all management agencies to
  - a. construct, operate and maintain all treatment works
  - b. implement all point and nonpoint control programs
16. An assessment of the initial plan and major alternatives of the planning process including identification of
  - a. plan schedule
  - b. effectiveness in meeting water quality goals
  - c. direct costs
  - d. social, economic and environmental impacts

II. WORK PLAN OUTLINE (continued)

B. Proposed Planning Process

3. Public Participation

A program for public involvement should be formulated as soon after designation of the 208 agency as possible. The program, an integral part of the planning process, should outline the specific means for public participation at each step in the process, including development and modification of the work plan. The planning process should be designed so that progression from one stage to another cannot take place without well-defined feedback from the public.

- The program should be an active one. Since the optimum degree of public involvement will usually not occur spontaneously, simply providing information to those who ask for it is not adequate. An active program is needed to seek out those who can provide useful inputs, as well as those who will be affected by the plan (e.g., League of Women Voters, Chamber of Commerce, conservation groups).

- The program should include adequate provision for disseminating information to the public. One of the greatest inhibitors to active public involvement in planning programs is the lack of readily available information. To preclude a lack of information in public participation programs, all data and information available to planners must be easily accessible to the public. Depositories of documents and data should be clearly identified to the public. Assistance should be provided in locating specific documents or data retained in the depository; reproduction equipment should be available for use at a moderate cost. Mailing lists and publications should also be used if appropriate.

- The program should be allocated adequate time and funding within the overall planning effort. Planning and operating an effective program will probably require the full-time efforts of one, and perhaps more, persons. Costs of the program should be included in the planning budget.

- The planning agency should designate and identify to the public the person or persons directly responsible for the public involvement program.

- The program should be responsive to all interested citizens. Participation in 208 planning should not be dominated by any one interest group or individual. This can best be done by including without exception in mailings, notifications, etc., all parties who express interest in the project or who have been involved in community issues related to water quality planning and management. Another arrangement would feature a fully funded citizen's advisory group acting in partnership with the planning and management agencies.

The proposed schedule should structure public involvement around key stages in the planning process, such as establishment of goals, refinement of work plan, design of alternatives, impact assessment, acceptance of final plan, plan revision, etc.

## Public Participation Summary

- **Information Material**

Periodic press releases will be made during the Section 208 planning program.

Public meetings on the plan and its progress will be held. Notification of said meetings will be published in the local newspaper three times, on days the agency is advised that readership would be best. Thirty days notice will be given before the hearing is held.

Summaries of the plan and program reports will be made available to the public and media.

- **Assistance to the Public**

Upon request, the designated agency will provide, insofar as possible, any group or individual with information and technical material.

- **Consultation**

Each affected jurisdiction will be contacted and given copies of the resolutions. A Citizen's Advisory Committee will be established, composed of representatives of affected agencies, and will be enlarged on commencement of the planning program. During the project, it is expected that the Committee will meet at least bimonthly to review progress and to provide feedback to the planning process.

- **Notification**

A list of interested and affected people and agencies will be maintained in the offices of the designated agency. This list will be used to send out information, etc., on the project.

- **Access to Information**

Copies of all pertinent data and water quality material are being and will continue to be kept on file with the designated agency. Reasonable cost reproduction is already available.

- **Enforcement**

Should any citizen wish to make suggestions or report violation of water quality management regulations, they will be welcome. The item will be reviewed by the staff of the designated agency and its consultant. If imminent danger to life and limb exists, the appropriate regulatory body will be notified. The suggestion or report will be placed on the agenda for the next regular Citizen's Advisory Committee meeting. If necessary, a report will be made to the governing board of the RCOG, but in any event, disposition of the item will be reported to the individual or agency involved.

- **Rule Making**

Prior to the adoption of any rule or regulations, a public meeting will be held (more than one if deemed necessary) and the proposal will be made available to the public.

- **Public Information Assistance**

To ensure that the public and elected officials understand the plan and the planning process, a public educational consultant will be retained to assist in the preparation of releases, reports, programs, etc.

## II. WORK PLAN OUTLINE (continued)

### 6. Necessary Actions by Other Agencies

If the designated planning agency anticipates the need for planning support from other local or State agencies, then those agencies and their contributions should be identified in the work plan outline. The work plan outline should indicate how the support will be coordinated, either during the planning phase or during both the planning and implementation phases. It should also include documentation of acceptance by the affected agency of such work or action. Documentation may take the form of memorandum of understanding, etc.

The examples shown in response to this requirement are letters of understanding between local and State agencies and the designated 208 planning agency agreeing to participate in the areawide planning process.

During refinement of the work plan, the tasks identified for these other agencies will be defined in detail and formally included in the detailed project scheduling.

TO: Mr. T. Rolf, Director  
FROM County Planning Agency  
SUBJECT: Areawide 208 Planning Participation

The County Planning Agency is pleased to support your request for revised land use plans. The Agency agrees to participate with RPG in preparing the necessary inputs to the Section 208 areawide plan and to make the applicable changes to the 1977 county land use plan. These changes consist of revisions to current maps to show the areawide land use features on a 1" = 2000 ft. scale on all census tracts within the SMSA.

The County Planning Agency will meet with the areawide planning advisory committee to lay the groundwork for discussion of major land use policy issues. Following these meetings the County Planning Agency will work with the land use task force of the RPG planning staff to develop the details of recommended land use controls. More specific land use planning activities to be performed by the County Planning Agency will be defined in the on-going work with the task force. The results of these discussions will be factored into the overall planning schedule.



## EXAMPLE

TO: Mr. T. Rolf, Director  
Regional Planning Group

FROM: State Water Control Board

SUBJECT: Areawide 208 Planning Participation

The State Water Control Board will assist the Regional Planning Group providing information to the 208 areawide planning program. The initial support will be in revising the waste load allocations, in schedules of compliance, and in the coordination of the water quality standards to be achieved by the areawide plan.

More specifically, the direct planning input to be provided by the State will consist of the following work elements.

- Classify stream segments.
- Assemble existing water quality data and note applicable standards.
- Assemble existing inventory of discharges.
- Assemble estimates of existing population, employment, and land use for the next 20 years.
- Disaggregate basin data by segments.
- Assemble existing water quality models.
- Refine waste load allocations.
- Model existing discharges and stream segments.
- Analyze results of revised waste load allocations.
- Document allocations and compliance schedules.

These elements will be included in a contract to be worked out during the refinement of your work plan. The State will also perform the coordination, review, and certification efforts required to integrate your areawide planning process with the State water quality management plan.

The Board, as a member of the Areawide Planning Advisory Committee, will participate in the policy sessions to determine the priority of major control alternatives.

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## II. WORK PLAN OUTLINE (continued)

### D. Schedule

The work plan outline must present a preliminary schedule demonstrating interrelationships of proposed work elements and anticipated dates of completion. Chapter 3 of the "Guidelines for Areawide Waste Treatment Management Planning" (August 1975) includes a suggested flow chart of the major activities to be undertaken during the planning period. Using this flow chart as a starting point, the designated Agency will develop its own proposed systematic schedule of activities, each with its link to other activities, in-house or consultant resources, time frame for completion, and milestones. This preliminary schedule will be presented in the work plan outline.

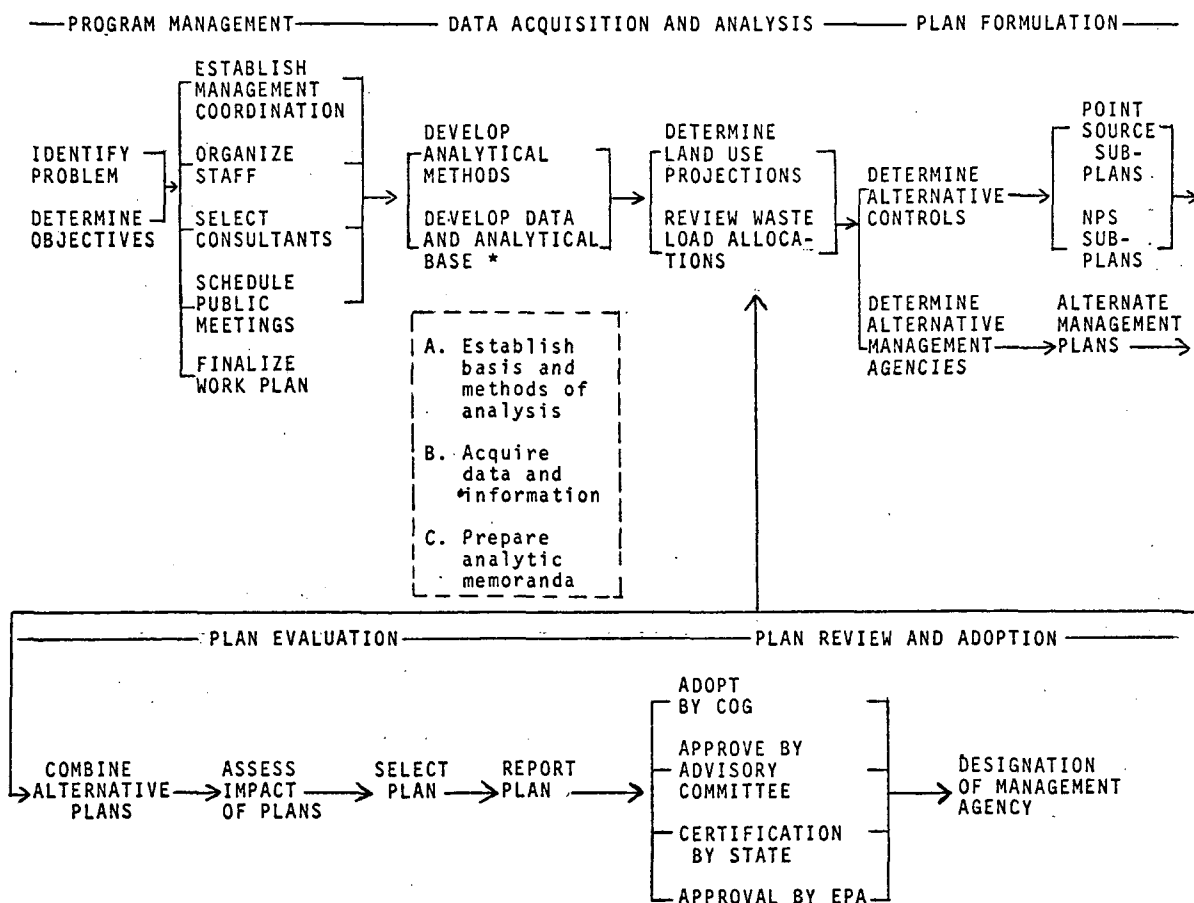
While this preliminary schedule will be refined during preparation of the final work plan following grant award, the proposed planning activities should still be thought out in enough detail at this stage to enable the preparation of a reasonable planning schedule. In most cases, this will require a break-down of activities into tasks. By assigning time and resource needs to each task, their schedule and interrelationships can be displayed systematically in a flow chart.

The tasks listed in the schedule should be related to the budgets (discussed in Section II E) and especially to the outputs of the planning process (discussed in Section II B.2). The work plan outline should reflect an output oriented process with activities leading towards products.

In the accompanying example, a top level block diagram is shown. Only a portion of the task schedule is shown with one of the items expanded to include the task description. The level of detail in the diagrams or task descriptions submitted in the work plan outline should be worked out between the areawide planning agency and the EPA Regional office.

## Detailed Schedule

The COG has developed an initial network for the purposes of scoping the planning program. The following block diagram represents the major work elements under which we have identified basic tasks. The initial network is available for EPA review.



\* Task Element Number II is expanded in more detail in the following example.

## Preliminary Schedule

Accompanying the initial network the COG has prepared a project work schedule by title of project task and by task description.

PROJECT WORK SCHEDULE

Project Task	Man-Months		Months from Project Start									
	In-House	Consultant	1	2	3	4	5	6	7	8	9	10
Periodic Milestones	-	-			o	•			*			•
					ø			ø		ø		
I. Program Initiation	-	-										
A. Establish the Water Quality Task Force	0.5		.....									
B. Establish program management and recruit staff	0.5		.....									
C. Prepare consultants work scope	1.0	6.0	.....									
D. Finalize Work Plan	5.0		.....									
II. Development of Data & Analytical Base												
A. Establish basis and methods of analysis	-	-										
1. Evaluate and extend sub-area delineation	3.0	1.0	.....									
2. Develop and enhance data processing	14.0	2.0	.....									
3. Develop small area allocation method	4.0	0.0	.....									
4. Establish a surveillance system	2.0	3.0	.....									
B. Acquire data and information*	-	-										
1. Collect population, employment and land use data	6.0	0.0	.....									
2. Acquire NPDES data	3.0	0.0	.....									
3. Acquire water quality sampling data	6.0	8.0	.....									

•  
•  
•  
etc.

\*Task element II.B. is expanded in the following example.

### Legend

- - Reports to State, EPA, Advisory Committee
- o - Public Information Report
- ø - Public Meeting
- \* - Program Review

## Planning Schedule

For each of the items in the preceding project task list, the COG has outlined a description of the activity and has estimated the manpower requirements and resultant costs. For example:

### II.B ACQUIRE DATA AND INFORMATION

#### B.1 Collect Population, Employment and Land Use Data

This information is available at scattered locations in the area. The COG maintains such files, but they will be supplemented by additional collection efforts through the County Sanitation District, State Department of Labor Statistics, and the four county planning organizations.

Manpower - 6 man months @ \$1,500/mm = \$9,000

#### B.2 Acquire NPDES Data

Information from the U.S. EPA and State discharge permits will be acquired early in the project, and at intervals thereafter, for data regarding present dischargers and actions required during the permit period.

Manpower - 3 man months @ \$1,500/mm = \$4,500

#### B.3 Acquire Water Quality Sampling Data

The proposed sampling program consists of determining the water quality runoff from each of the eight identified hydrologic watersheds within the planning area. The existing continuous water quality recorder operated by the State on mile 46.2 of the Green River will be supplemented by the planning agency with two more continuous recorders - one at the mouth of Sand Creek and the other at the mouth of Mud Creek. These three recorders will divide the planning area into approximately three equal areas and will provide diurnal and seasonal water quality data together with data over a range of hydrologic events throughout the two year planning period. In addition, grab samples will be taken periodically (an average of once a month) at 8 other locations within the planning area during the first year to determine more localized water quality information. The State University laboratories will be used to analyze the samples taken.

Equipment	- 2 continuous recorders and operation	\$ 8,000
	- lab tests - 100 samples @ 50/sample	5,000
Manpower	- 14 man months @ \$1,500/mm =	21,000
	Total	\$34,000

#### B.4 Etc.

## II. WORK PLAN OUTLINE (continued)

### E. Resource Budget

The budget for the planning process should be itemized in accordance with the project tasks defined in the preliminary schedule. For each task in the schedule estimates should be made of the types of skills and man-days necessary to complete the task. These estimates should then be converted into costs by tasks with appropriate personnel salary rates, fringe benefits, travel expenses, special equipment, materials, and supplies. Contracts or consulting services should be identified separately from local planning agency staff. The consulting services must also be related to specific tasks and products.

All cost information included in a grant application is subject to a cost analysis. Therefore, it should be specific and complete and in accordance with EPA form number 5700-33 described in Section I, A. The EPA Regional offices have additional guidance and examples for the preparation of cost information.

The accompanying example represents the summary sheet of a work plan outline budget. Under each of the major headings an itemization must be submitted in accordance with the tasks described in Section II.D. The itemization should conform to this summary example in terms of the cost categories listed.

# EXAMPLE

## PROPOSED BUDGET BY WORK ELEMENT

WORK ELEMENTS	SALARIES	FRINGE (13.5%)	TRAVEL	SUPPLIES & EQUIPMENT	CONTRACTUAL	OTHER DIRECT	TOTAL DIRECT	INDIRECT (30%)	TOTAL
Finalize Work Plan	5,523	746					6,269	1,881	8,150
Land Use Planning	33,141	4,474					37,615	11,285	48,900
Pop. & Eco. Projections	18,808	2,539			10,000		31,346	9,404	40,750
Water Quality	50,873	6,868			17,500		75,231	22,569	97,800
Nonpoint Source	44,186	5,965					50,154	15,046	65,200
Point Source	77,330	10,440					87,769	26,331	114,100
Institutional Planning	22,568	3,047			12,000		37,615	11,285	48,900
Public Participation	48,627	6,565	7,500				62,692	18,808	81,500
Program Management	72,931	9,846	4,800	19,000			106,577	31,973	138,550
State Coordination	4,202	567	1,500				6,269	1,881	8,150
Urban & Storm Drainage	26,242	3,543			14,100		43,885	13,166	57,050
Facilities Planning	71,806	9,694					81,500	24,450	105,950
							TOTAL		\$815,000



## II. WORK PLAN OUTLINE (continued)

### F. Disbursement and Milestones

In order to be effective, the final work plan will have target completion dates for the various outputs as well as interim milestones. These milestones will be used to evaluate program progress and, where necessary, to make the changes to the work plan. The milestones will also be related to the disbursement schedule\* to insure the responsible expenditure of Federal funds.

The disbursement from the planning agency to the local staff, contractors, consultants, and other agencies should track the progress being made on the schedule with the available funds. Quarterly progress report of plan accomplishments will be submitted to the EPA Regional Administrator.

At this stage, the work plan outline will include a preliminary disbursement schedule relating estimated disbursements to progress. Each item in the milestone list should be related to the project task in the proposed work schedule. The accompanying example indicates the level-of-detail which is appropriate for the grant application

\*Note: Additional information on grant disbursement through letters-of-credit is available in EPA-AM memorandum No. 13 entitled "Implementation of Letter of Credit for 208 Grants", dated October 22, 1975.

# EXAMPLE

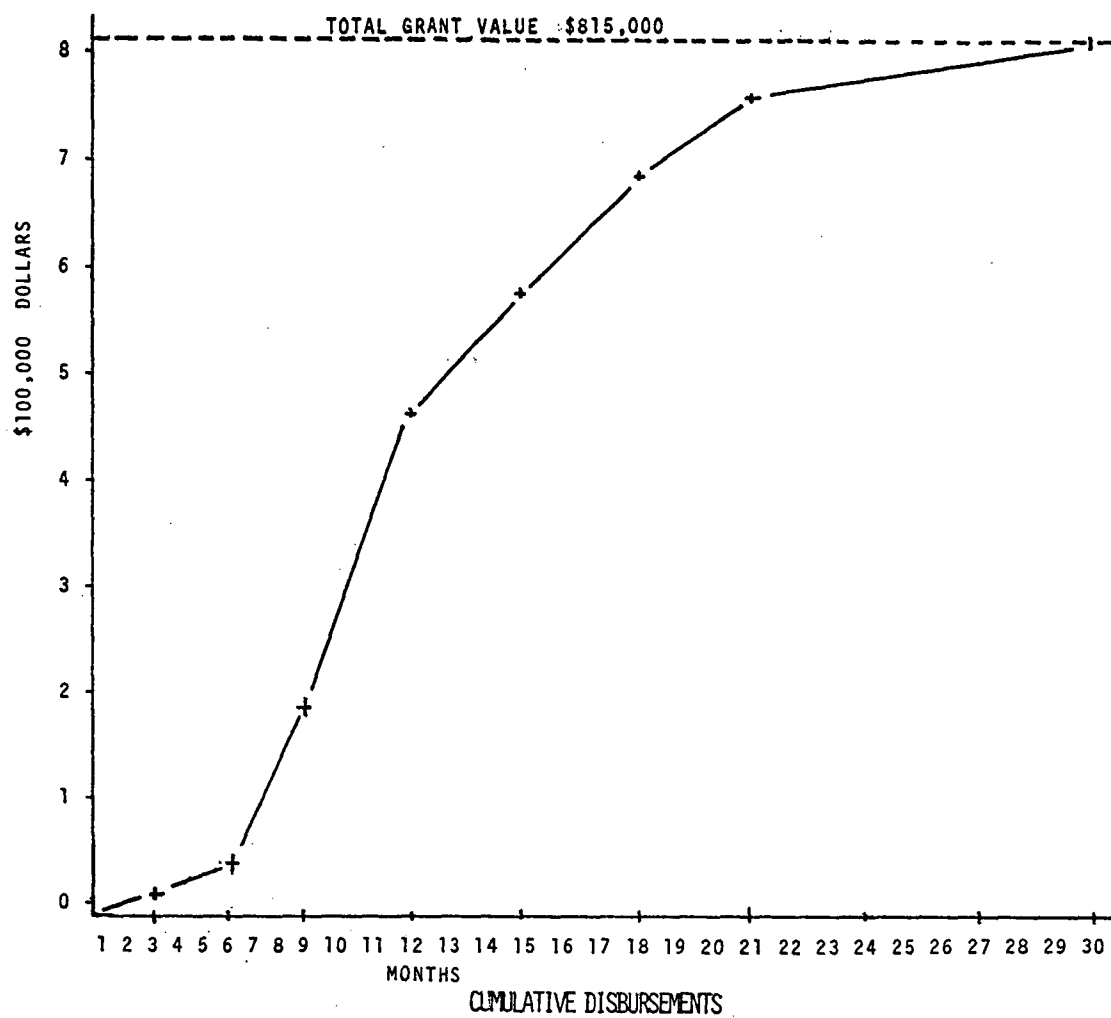
## Disbursements and Milestones

A final quarterly disbursement chart will be prepared after detailed scopes are set up for in-house work and consultant services. Quarterly progress reports will be prepared through the DWR program management system and submitted to the Regional Administration of U.S. EPA. These reports will show actual versus planned expenditures and mark progress against major milestones. The table below shows a preliminary list of milestones to be confirmed after the grant award and set up of detailed scopes.

Month	Task	Description
1	IB, IC	Establish task force and management control Plan public involvement
3	IVG1	Complete characterization of flows and loads from continuous sources
6	ID	Complete revisions to initial work plan; select and contract consultants
9	IIC	Depict environmental background data
11	IVA-D	Complete water quality sampling
15	IIID1	Recommend land use strategies to achieve water quality objectives
15	VIA-D	Complete verification of all models needed for study of alternatives
15	IVG2	Complete estimates of flows and loads from intermittent point sources
15	V D	Set final water quality objectives for study
18	VIIIG, VIIIH	Screen sub-plans for continuous and intermittent sources to select leading alternatives
19	IXD	Develop alternative management plans
19	VIII I, VII K	Produce and test areawide technical plans
20	XI	Complete evaluation and select areawide plan
21	IXE	Detail management policies for selected plan
22	XII	Complete assessment
24	XIII	Prepare final report and submit for review
30		Final approval and certification

continued . . .

# EXAMPLE



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### III. REFINEMENT OF WORK PLAN

Refined Work Plans are to be developed after grant award and must be submitted within the time frame specified in the grant conditions.

These refinements supplement the work plan outline contained in the application for funds and demonstrate the basis for effective project management. They must:

1. Provide any information needed to overcome deficiencies in meeting grant application criteria;
2. Demonstrate the correction of any deficiencies or uncertainties in the grant application which have been identified by the State or EPA;
3. Provide for meeting any grant conditions established by EPA which affect the plan of work, schedule, budget and/or accounting procedures;
4. Meet fully the criteria provided by the EPA Regional Office. The example shown on the opposite page illustrates one such set of criteria.

During this stage of the planning process, it is critical that the designated areawide planning agency work closely with both the State and EPA to insure a final product reflecting both the State and areawide water quality management process. In addition, the refinement process should include input from the Policy Advisory Committee, technical advisory committees established as part of the areawide planning process, and other interested individuals or groups.

## Refined Work Plan Criteria

- A. Identify the membership of the Areawide Planning Advisory Committee;
- B. Describe the intended operation of the Areawide Planning Advisory Committee including frequency of meetings, and committee responsibilities.
- C. Ranking waste management or receiving water quality problems in the area according to their relative seriousness and urgency and including:
  1. an identification of the geographic coverage of each water quality problem
  2. a brief identification of the extent to which each problem will be addressed in the planning process.
- D. Briefly describe and evaluate prior investigations and the adequacy of presently available data for formulating plans regarding each waste problem to be addressed by the planning process and identify the major information deficiencies.
- E. Provide a more detailed plan of work:
  1. Describe the goals and objectives of the planning process. These goals and objectives must focus on the water quality problems to be dealt with in the planning process and must reflect the priority of these problems.
  2. Describe each task or activity with:
    - a) Level of detail, accuracy and/or completeness required for each analysis.
    - b) Identification of the extent, nature and purpose of any computerized mathematical modeling to be done including a description of whether such modeling involves the development of new models or the extension and refinement of existing models.
    - c) Where appropriate and to the extent feasible, an identification of the alternatives to be considered and the main technical procedures to be used.
    - d) Identification of the geographic area to be covered in carrying out each task.
  3. A concise listing of all outputs (draft, interim, or final), including reports, technical memos, working papers, policy papers, etc., and a brief description of each output. The expected publication date must also be shown.

## EXAMPLE

4. A schedule and a chart, PERT, CPM or other, which is sufficient to clearly identify:
  - a) all significant tasks or activities included in the plan of work by name and number.
  - b) the sequence of undertaking and completing tasks and activities.
  - c) the relationship and/or interdependence of tasks and activities.
  - d) the schedule, to at least a monthly level of detail, for undertaking and completing each task and/or activity.
  - e) each interim and final product or report including those required to be submitted to the State and/or EPA.
5. Description of specific procedures which will be used to evaluate compliance with proposed budgets and schedules on no less than a monthly basis (procedures should cover all portions of the planning effort including that conducted by the grantee, contractors and other agencies accepting responsibilities).
6. Description of procedures for coordinating 208 planning with:
  - a) Facilities planning, funded partially or wholly by a Step 1 grant, either underway or expected to be initiated in the future.
  - b) HUD 701 and land use planning.
  - c) Air quality maintenance planning.
  - d) Coastal Zone Management and shoreline management planning.
  - e) Planning pursuant to Section 209 and State Water Quality Management planning under the Act.
  - f) Other water quality related planning.
- F. Describe the specific procedures to be followed in assuring adequate public participation during plan development, review and adoption.

continued ...

## EXAMPLE

- G. Generally describe the proposed content of the quarterly milestone reports. As a minimum, the milestone report must contain a discussion of current progress and expenditures for each task as compared with projected progress and expenditures outlined in the work plan. Lack of scheduled progress or cost overruns are to be discussed in detail and a program described for correcting any problems. Reports are to contain a brief but comprehensive discussion of work performed during the quarter and other pertinent information.
- H. Identify all organizations other than the applicant whose participation is necessary to carry out the plan of work including:
  - 1. Tasks or activities to be wholly conducted by other public agencies.
  - 2. Description of the action(s) expected on the part of each identified public agency where less than total responsibility for a task or activity is assigned (exclude incidental and minor coordination).
  - 3. Listing of tasks or portions of tasks to be accomplished by consultants under contract.
- I. Document that each identified agency has accepted responsibility for the described action(s) (documentation regarding review of the plan by local officials is not required).
- J. Provide a manpower and cost-distribution table.



### § 35.208-2 Application requirements.

(a) Each agency applying for section 208 planning grants shall meet the following application requirements:

(1) Applications shall be made to EPA on such forms as the Administrator may prescribe pursuant to § 30.315 of this Chapter.

(2) Evidence shall be provided that all requirements of OMB Circular No. A-95 have been met.

(3) A statement shall be provided indicating that provisions have been made or will be made for the establishment of the following appropriate advisory groups:

(i) For State planning areas, a policy advisory committee for each approved planning area; the membership and role of this committee shall be consistent with § 130.16(c) of this Chapter;

(ii) For areawide planning areas, a policy advisory committee whose membership shall be consistent with § 130.16(d) of this Chapter.

(4) A statement shall be provided that the proposed activity takes into account the relationship with affected State, local and Federal programs, and with other applicable resource and developmental planning programs as set forth in § 130.-34(a) of this Chapter.

(5) A statement shall be included indicating that the planning process will become financially self-sustaining and provide for annual update of the plan once the initial plan is developed and approved.

(6) An outline of the work plan which the applicant will submit pursuant to § 35.220 herein shall be provided by State and designated areawide planning agencies.

(7) A statement indicating how matching funds, if required, will be provided.

(b) Areawide planning agencies designated by the Governor(s) shall provide, in addition to the requirements set forth in § 35.208-2(a), a certification document submitted by the State planning agency designated pursuant to § 130.12 of this Chapter, which document shall include a statement that the State has reviewed the application and finds that:

(1) The proposed work complies or does not comply with all State requirements, including any applicable plan(s) prepared pursuant to Part 131 of this Chapter;

(2) The proposed planning work program is or is not adequate and necessary to accomplish the development of a plan pursuant to Part 131 of this Chapter;

(3) Insofar as is known, the planning will or will not duplicate any work which has been done or is being done to meet the facilities planning requirements of § 35.917-35.917-0 of this Part and other water quality management planning requirements of Part 131 of this Chapter; and

(4) That the State either recommends or does not recommend that the grant application should be approved by EPA.

(c) State planning agencies shall submit, in addition to the requirements of § 35.208-2(a), evidence of compliance with the procedures of § 130.13 of this Chapter, including evidence that adequate communication was made with chief elected officials of local units of government in the designation of local areas.

### § 35.220 Work plan development.

#### § 35.220-1 Applicability.

The specific requirements of this section are applicable only to work plans related to grants awarded after June 30, 1975.

#### § 35.220-2 Content.

(a) Planning in State planning areas. State planning agencies must submit a work plan based on the approved continuing planning process, including the State/EPA agreement, prepared pursuant to § 130.10 of this Chapter, and which is consistent with the requirements herein and the requirements of § 130.11 of this Chapter. The work plan shall be included as an element of the State program plan submitted pursuant to section 106 of the Act which will set forth a work schedule, cost and resource budget and disbursement schedule.

(b) Planning in areawide planning areas. Designated areawide planning agencies must submit a work plan which contains:

(1) A description of all work performed to date which will be used in the plan development;

(2) A description of the proposed planning process developed pursuant to § 130.10 of this Chapter which will be utilized to (i) identify and evaluate feasible measures to control point and nonpoint pollution sources, which measures may take into account all source location and review measures necessary to meet State implementation plan requirements in the area, (ii) develop an integrated areawide plan to control these sources, and (iii) establish an areawide management program (including financing) for plan implementation;

(3) A description of any necessary action in the planning to be taken by agencies other than the applicant and procedures to be used in coordination of such activities; documentation of the acceptance by the affected responsible agency of such required work or action shall be included and presented with the work plan;

(4) A schedule showing required interrelationships of work to be accomplished and anticipated dates of completion;

(5) A cost and resource budget, including work to be done under contract or by interagency agreement, and

(6) A proposed disbursement schedule with specific progress milestones related to disbursements.

#### § 35.220-3 Submission.

As expeditiously as possible, grantees conducting State and areawide planning must submit to the Regional Administrator a written work plan meeting the requirements of § 35.220-2. For areawide planning agencies, the work plan shall be submitted not later than twelve months from the date of the Administrator's approval of the designation. A copy of the areawide planning agency's work plan and future significant modifications thereto shall be provided to the State planning agency designated pursuant to

§ 130.12 of this Chapter for review and comment. Pursuant to § 35.220-3, submission and approval of the work plan is a precondition to release of grant funds for further areawide planning pursuant to Part 131 of this Chapter.

#### § 35.220-4 Funding for work plan development.

Where the grant agreement, subject to provisions of § 35.212, provides for work plan development, the grantee will obligate generally not to exceed five percent (5%) of the total award for that purpose. Further additional obligation is not authorized until approval of the work plan is granted by the Regional Administrator. Where work plan development is set as a milestone in the grant agreement, the decision on size of the initial advance will take into account this five percent (5%) limitation.

#### § 130.10 - Planning process requirements.

(a) The State and designated area-wide planning agencies shall establish a planning process which provides for the establishment of necessary institutional arrangements and management programs to make and implement coordinated decisions designed to achieve water quality goals and standards. The planning process shall include:

(1) Public participation during plan development, review, and adoption in accordance with section 101(e) of the Act and in accordance with Part 105 of this Chapter;

(2) Adequate intergovernmental input in the development and implementation of water quality management plans as described in § 130.17;

(3) The coordination and integration of the water quality management planning in State planning areas and in designated areawide planning areas as described in § 130.33, and coordination of water quality management planning with related Federal, State, interstate, and local comprehensive, functional, and other developmental planning activities, including land use and other natural resources planning activities, as described in § 130.34;

(4) The preparation, adoption, and revision, of water quality management plans for the appropriate areas and waters within the State that fulfill the requirements contained in Part 131 of this Chapter;

(5) The establishment and implementation of regulatory programs identified in approved water quality management plans prepared pursuant to Part 131 of this Chapter;

#### § 131.11 - Plan content.

Recognizing that the level of detail may vary according to the water quality problems, the following elements shall be included in each water quality management plan unless a certification pursuant to § 130.11(b) of this Chapter provides otherwise:

(a) *Planning boundaries.* A delineation, on a map of appropriate scale, of the following: (1) The approved State planning areas included in the State planning process submitted and approved pursuant to § 130.41 of this Chapter and areawide planning areas designated pursuant to § 130.13 of this Chapter.

(2) Those areas in which facilities planning has been deemed necessary by the State pursuant to § 35.917-2 of this Chapter.

(3) The location of each water quality and effluent limitation segment identified in § 131.11(b) (2).

(4) The location of each significant discharger identified in § 131.11(c).

(5) The location of fixed monitoring stations.

(Note: Such monitoring station locations may be omitted if such locations are available in the EPA water quality information system).

(b) *Water quality assessment and segment classifications.* (1) An assessment of existing and potential water quality problems within the approved planning area or designated areawide planning area, including an identification of the types and degree of problems and the sources of pollutants (both point and nonpoint sources) contributing to the problems. The results of this assessment should be reflected in the State's report required under Section 305(b) of the Act.

(2) The classification of each segment as either water quality or effluent limitation as defined in § 130.2(c) of this Chapter.

(3) Segments shall include the surrounding land areas that contribute or may contribute to alterations in the physical, chemical, or biological characteristics of the surface waters.

(d) Water quality problems generally shall be described in terms of existing or

potential violations of water quality standards.

(iii) Each water quality segment classification shall include the specific water quality parameters requiring consideration in the total maximum daily load allocation process.

(iv) In the segment classification process, upstream sources that contribute or may contribute to such alterations should be considered when identifying boundaries of each segment.

(v) The classification of segments shall be based on measurements of in-stream water quality, where available.

(c) *Inventories and projections.* (1) An inventory of municipal and industrial sources of pollutants and a ranking of municipal sources which shall be used by the State in the development of the annual State strategy described in § 130.20 of this Chapter and the "project priority list" described in § 35.915(c) of this Chapter. The inventory shall include a description, by parameter, of the major waste discharge characteristics of each significant discharger of pollutants based on data from the National Pollutant Discharge Elimination System and the associated compliance monitoring systems, whenever available.

(2) A summary of existing land use patterns.

(3) Demographic and economic growth projections for at least a 20-year planning period disaggregated to the level of detail necessary to identify potential water quality problems.

(4) Projected municipal and industrial wasteloads based on § 131.11(c) (1) and (3).

(5) Projected land use patterns based on § 131.11(c) (2) and (3).

(d) *Nonpoint source assessment.* An assessment of water quality problems caused by nonpoint sources of pollutants.

(1) The assessment shall include a description of the type of problem, an identification of the waters affected (by segment or other appropriate planning area), an evaluation of the seriousness of the effects on those waters, and an identification of nonpoint sources (by category as defined in § 131.11(j)) contributing to the problem.

(2) Any nonpoint sources of pollutants originating outside a segment which materially affect water quality within the segment shall be considered.

(3) The results of this assessment should be reflected in the States' report required under Section 305(b) of the Act.

(e) *Water quality standards.* The applicable water quality standards, including the Statewide antidegradation policy, established pursuant to Section 303(a), (b), and (c) of the Act and any plans for the revision of such water quality standards.

(f) *Total maximum daily loads.* (1) For each water quality segment, or appropriate portion thereof, the total allowable maximum daily load of relevant pollutants during critical flow conditions for each specific water quality criterion being violated or expected to be violated.

(1) Such total maximum daily loads shall be established at levels necessary to achieve compliance with applicable water quality standards.

(ii) Such loads shall take into account:

(A) Provision for seasonal variation; and

(B) Provision of a margin of safety which takes into account any lack of knowledge concerning the relationship between effluent limitations and water quality.

(2) For each water quality segment where thermal water quality criteria are being violated or expected to be violated, the total daily thermal load during critical flow conditions allowable in each segment.

(i) Such loads shall be established at a level necessary to assure the protection and propagation of a balanced, indigenous population of fish, shellfish, and wildlife.

(ii) Such loads shall take into account:

(A) Normal water temperature;

(B) Flow rates;

(C) Seasonal variations;

(D) Existing sources of heat input; and

(E) The dissipative capacity of the waters within the identified segment.

(iii) Each estimate shall include an estimate of the maximum heat input that can be made into the waters of each segment where temperature is one of the criteria being violated or expected to be violated and shall include a margin of safety which takes into account lack of knowledge concerning the development of thermal water quality criteria for protection and propagation of fish, shellfish and wildlife in the waters of the identified segments.

(3) For each water quality segment, a total allocation for point sources of pollutants and a gross allotment for nonpoint sources of pollutants.

(i) A specific allowance for growth shall be included in the allocation for point sources and the gross allotment for nonpoint sources.

(ii) The total of the allocation for point sources and the gross allotment for nonpoint sources shall not exceed the total maximum daily load.

(4) Where predictive mathematical models are used in the determination of total maximum daily loads, an identification and brief description of the model, and the specific use of the model.

(NOTE: Total maximum daily loads shall not be determined by designated areawide planning agencies except where the State has delegated such responsibility to the designated agency. In those cases where the responsibility has not been delegated, the State shall determine total maximum daily loads for the designated areawide planning area).

(5) No point source load allocation developed pursuant to this section shall be less stringent than effluent limitations standards, or prohibitions required to be established pursuant to Sections 301, 302, 304, 306, 307, 311, and 316 of the Act.

(g) *Point source load allocations.* (1) For each water quality segment, the in-

dividual load allocation for point sources of pollutants, including thermal load allocations, for the next five-year period of the plan.

(NOTE: In those segments where water quality standards are established at levels less stringent than necessary to achieve the 1983 water quality goals specified in Section 101(a)(2) of the Act, the Regional Administrator may request the State to provide appropriate information, such as wasteload allocation information which may be relevant in making water quality related effluent limitation determinations pursuant to Section 302 of the Act).

(2) The total of such pollutant load allocations or effluent limitations for all individual point sources in the water quality segment shall not exceed the total allocation for the five-year period for all point sources of pollutants for each segment determined pursuant to § 131.11 (f)(3).

(3) Each pollutant load allocation established pursuant to this paragraph shall incorporate an allowance for anticipated economic and population growth over at least a five-year period and an additional allowance reflecting the precision and validity of the method used in determining such allowance.

(4) Establishment of pollutant load allocations shall be coordinated with the development of terms and conditions of permits under the National Pollutant Discharge Elimination System and with any hearings pursuant to Section 302 and 316(a) of the Act relating to a source discharging to or otherwise affecting the segment.

(NOTE: Point source load allocations shall not be determined by designated areawide planning agencies except where the State has delegated such responsibility to the designated agency. In those cases where the responsibility has not been delegated, the State shall determine point source load allocations for the designated areawide planning area).

(h) *Municipal waste treatment systems needs.* (1) The municipal wastewater collection and treatment system needs by 5-year increments, over at least a 20-year period including an analysis of alternative waste treatment systems, requirements for and general availability of land for waste treatment facilities and land treatment and disposal systems, total capital funding required for construction, and a program to provide the necessary financial arrangements for the development of such systems.

(2) The identification of municipal waste treatment systems needs shall take into consideration:

(i) Load reductions needed to be achieved by each waste treatment system in order to attain and maintain applicable water quality standards and effluent limitations.

(ii) Population or population equivalents to be served, including forecasted growth or decline of such population over at least a 20-year period following the scheduled date for installation of the needed facility.

(iii) The results of preliminary and completed planning conducted under

Step I and Step II grants pursuant to Title II of the Act.

(NOTE: In the absence of the Title II planning described above, the State is expected to develop the necessary estimates and analyses required under § 131.11(h)(1)).

(i) *Industrial waste treatment systems needs.* (1) The anticipated industrial point source wasteload reductions required to attain and maintain applicable water quality standards and effluent limitations for at least a 20-year planning period (in 5-year increments).

(2) Any alternative considerations for industrial sources connected to municipal systems should be reflected in the alternative considerations for such municipal waste treatment system.

(j) *Nonpoint source control needs.* (1) For each category of nonpoint sources of pollutants to be considered in any specified area as established in the State/EPA agreement (see § 130.11 of this Chapter), an identification and evaluation of all measures necessary to produce the desired level of control through application of best management practices (recognizing that the application of best management practices may vary from area to area depending upon the extent of water quality problems).

(2) The evaluation shall include an assessment of nonpoint source control measures applied thus far, the period of time required to achieve the desired control (see § 131.11(m)), the proposed regulatory programs to achieve the controls (see § 131.11(n)), the management agencies needed to achieve the controls (see § 131.11(o)), and the costs by agency and activity, presented by 5-year increments, to achieve the desired controls, and a description of the proposed actions necessary to achieve such controls.

(3) The nonpoint source categories shall include: (i) Agriculturally related nonpoint sources of pollution including runoff from manure disposal areas, and from land used for livestock and crop production;

(ii) Silviculturally related nonpoint sources of pollution;

(iii) Mine-related sources of pollution including new, current and abandoned surface and underground mine runoff;

(iv) Construction activity related sources of pollution;

(v) Sources of pollution from disposal on land in wells or in subsurface excavations that affect ground and surface water quality;

(vi) Salt water intrusion into rivers, lakes, estuaries and groundwater resulting from reduction of fresh water flow from any cause, including irrigation, obstruction, groundwater extraction, and diversion; and

(vii) Sources of pollution related to hydrologic modifications, including those caused by changes in the movement, flow, or circulation of any navigable waters or groundwaters due to construction and operation of dams, levees, channels, or flow diversion facilities.

(NOTE: Nonpoint source control needs need not be determined by designated areawide planning agencies where the Governor has determined pursuant to Section 200(b)(4)

of the Act that the State will develop non-point source control requirements on a Statewide basis.)

(k) **Residual waste control needs; land disposal needs.** (1) An identification of the necessary controls to be established over the disposition of residual wastes which could affect water quality and a description of the proposed actions necessary to achieve such controls.

(2) An identification of the necessary controls to be established over the disposal of pollutants on land or in subsurface excavations to protect ground and surface water quality and a description of the proposed actions necessary to achieve such controls.

(NOTE: Residual waste control needs need not be determined by designated areawide planning agencies where the Governor has determined pursuant to Section 208(b) (4) of the Act that the State will develop residual waste control requirements pursuant to Section 208(b) (2) (J) and (K) on a Statewide basis.)

(l) **Urban and industrial stormwater systems needs.** (1) An identification of the required improvements to existing urban and industrial stormwater systems, including combined sewer overflows, that are necessary to attain and maintain applicable water quality standards.

(2) An identification of the needed urban and industrial stormwater systems for areas not presently served over at least a 20-year planning period (in 5-year increments) that are necessary to attain and maintain applicable water quality standards, emphasizing appropriate land management and other non-structural techniques for control of urban and industrial stormwater runoff.

(3) A cost estimate for the needs identified in (1) and (2) above, the reduction in capital construction costs brought about by nonstructural control measures, and any capital and annual operating costs of such facilities and practices.

(m) **Target abatement dates.** Target abatement dates or schedules of compliance for all significant dischargers, nonpoint source control measures, residual and land disposal controls, and stormwater system needs, including major interim and final completion dates, and requirements that are necessary to assure an adequate tracking of progress toward compliance.

(n) **Regulatory programs.** (1) A description of existing State/local regulatory programs which are being or will be utilized to implement the State water quality management plan. The description shall include the regulatory approach to be employed, the statutory basis for the program, and relevant administrative and financial program aspects.

(2) A description of necessary additional State/local regulatory programs to be established in order to implement the State water quality management plan. The description shall include the proposed regulatory approach, the necessary legislation, and anticipated administrative and financial capabilities.

(3) The regulatory programs described in § 131.11(n) (1) and (2) should generally take full advantage of existing legislative authorities and administrative capabilities. However, such programs shall assure that:

(i) To the extent practicable, waste treatment management including point and nonpoint source management shall be on a Statewide and/or an areawide basis and provide for the control or abatement of all sources of pollution including in-place or accumulated deposits of pollutants;

(ii) The location, modification and construction of any facilities, activities, or substantive changes in use of the lands within the approved planning area, which might result in any new or deleterious discharge directly or indirectly into navigable waters are regulated; and

(iii) Any industrial or commercial wastes discharged into any publicly owned treatment works meet applicable pretreatment requirements.

(o) **Management agencies.** (1) The identification of those agencies recommended for designation by the Governor pursuant to § 130.15 of this Chapter to carry out each of the provisions of the water quality management plan. The identification shall include those agencies necessary to construct, operate and maintain all treatment works identified in the plan and those agencies necessary to implement the regulatory programs described in § 131.11(n).

(2) Depending upon an agency's assigned responsibilities under the plan, the agency must have adequate authority and capability:

(i) To carry out its assigned portions of an approved State water quality management plan(s) (including the plans developed for areawide planning areas designated pursuant to Section 208(a) (2), (3), or (4) of the Act) developed under this part;

(ii) To effectively manage waste treatment works and related point and non-point source facilities and practices serving such area in conformance with the approved plan;

(iii) Directly or by contract, to design and construct new works, and to operate and maintain new and existing works as required by any approved water quality management plan developed under this part;

(iv) To accept and utilize grants or other funds from any source for waste treatment management or nonpoint source control purposes;

(v) To raise revenues, including the assessment of user charges;

(vi) To incur short and long term indebtedness;

(vii) To assure, in implementation of an approved water quality management plan, that each participating community pays its proportionate share of related costs;

(viii) To refuse to receive any wastes from a municipality or subdivision thereof, which does not comply with any provision of an approved water quality management plan applicable to such areas; and

(ix) To accept for-treatment industrial wastes.

(p) **Environmental, social, economic impact.** An assessment of the environmental, social, and economic impact of carrying out the plan.