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# **Office of Water Operating Guidance and Accountability System**

## **Fiscal Year 1983**

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## I INTRODUCTION

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### A. Purpose

The Office of Water Operating Guidance and Accountability System for FY 1983 serves the following three major functions: (1) provides national program directions for implementation; (2) establishes a basis for the negotiation of grant funds between Regions and States; and (3) outlines the measures that will be used by Headquarters for accountability purposes.

This guidance does not cover all activities necessary for program implementation; it concentrates only on national priorities. This guidance does cover a wide range of activities, and States are not expected to address every national priority. Rather, Regions and States should use this guidance as they negotiate FY 1983 work programs and should address those priorities applicable to their own situation.

EPA recognizes the ability of Regional and State program managers to operate their continuing base level water quality programs, but expects that a portion of Federal grant funds will be directed toward the national program directions covered in this guidance. The national program directions are the only activities Headquarters will track for accountability purposes. These national program directions are also the areas the Regions and States may choose to address if they are preparing FY 1983 State/EPA Agreements.

### B. Summary

#### Clean Water Act

In FY 1983, several major activities will take place as the Office of Water, along with the Regions and States, implements the Clean Water Act. There will be a continued emphasis on State assumption and maintenance of programs. Greater attention will be placed on adequate planning in advance of water quality decision-making. Since technology-based controls will largely be established, States are expected to examine their programs for making water quality based decisions through standards attainability analyses, ranking priority waterbodies, and conducting total maximum daily load calculations under section 303(d). Implementing the water monitoring strategy will help ensure the effectiveness of water quality standards and the water quality based approach.

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In coordination with up-front planning, EPA is stressing the importance of ensuring the financial capability of grantees to achieve implementation and to produce environmental results. The construction grants program will stress improved management, restoration of uses, and reorientation of the project priority list toward priority waterbodies. The Agency will continue to review advanced treatment projects to determine whether they will result in significant water quality improvements.

With the issuance of effluent guidelines and the development of water quality based information, there will be an emphasis on reducing the number of expired industrial permits. The overriding principles for issuance of National Pollutant Discharge Elimination System (NPDES) permits are that they be based on good science, they be of lasting value and not subject to frequent change, and that ample opportunity for input is provided. These principles are included in the second round permitting policy which further clarifies how the principles apply to industrial dischargers whose permits are in need of renewal or possible modification. In FY 1983, EPA will also seek to improve the compliance rate, particularly for municipal dischargers.

#### Safe Drinking Water Act

The continuing priorities in FY 1983 under the Safe Drinking Water Act are the Public Water Systems Supervision program and the Underground Injection Control (UIC) program.

In the Public Water Systems Supervision program, EPA has three major priorities for the Regions and States: (1) to extend the coverage of the trihalomethane (THM) regulation to systems serving 10,000 to 75,000 people and to ensure that the microbiological quality of the water is fully protected in the process; (2) to respond effectively to incidents of the detection of significant ground water contamination with unregulated contaminants; and (3) to continue to improve compliance by small systems with the existing standards, giving highest priority to the most serious threats to public health.

In the Underground Injection Control program, the major FY 1983 priorities are: (1) to encourage additional States to assume primacy (primary enforcement responsibility); (2) to begin direct implementation by EPA in non-primacy States and on Indian lands; and (3) to provide oversight and assistance to primacy States as needed.

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Ocean Dumping and Discharge Regulation

In FY 1983, EPA Regions will assume the responsibility of reviewing applications for and issuing 301(h) waiver permits. This activity will be based on technical studies performed at the Headquarters level for the 70 communities which prepared final applications. In addition, the 1981 amendments to the Clean Water Act removed several prohibitions in EPA's 301(h) regulations and reopened the application process to additional coastal communities. This will greatly increase EPA's workload, and will require a re-evaluation of Agency resources for this activity.

In FY 1983, under the Marine Protection Research and Sanctuaries Act (MPRSA) EPA Regions will implement revised ocean dumping regulations. The Agency can expect some increase in applications for ocean dumping of materials which pass the scientific criteria. Also, as a result of the recent *New York City v. EPA* court decision, the Agency will no longer automatically prohibit dumping of materials which fail the criteria but will need to consider the environmental consequences and need for ocean disposal versus the environmental consequences and costs of land-based disposal alternatives. This decision has added impetus to the scientific review of the current testing and monitoring procedures, including a consideration of modifications to the regulation's bioassay test procedures.

In FY 1983, EPA Regions will assume the responsibility for reviewing applications for and issuing 301(h) waiver permits.

Ground Water Protection Policy

In FY 1983, EPA will implement a new ground water protection policy. This policy will call for major efforts to enhance the coordination of EPA and State activities to protect ground water quality through the implementation of the Clean Water Act, Safe Drinking Water Act, Resource Conservation and Recovery Act, the Underground Injection Control program, Superfund, and related programs.

Accountability

The activities that will be tracked in the Office of Water Accountability System are based on the national program directions highlighted above and covered in detail in Section II. The Office

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of Water will provide direct input to the Administrator's Management Accountability System. All of the major water program directions of the Administrator's System are reflected in the Office of Water System; for example, State delegation and management of the construction grants program.

Funding

Using the available funding sources, States and local governments should develop and maintain a base level water quality program. Each State should define its base program depending upon its individual situation. While EPA recognizes the need to maintain a base level program, States should direct a portion of their available resources toward priority waterbodies to undertake the water quality planning activities necessary to make implementation decisions.

## II NATIONAL PROGRAM DIRECTIONS - IMPLEMENTATION

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The following section discusses national program directions within the Office of Water. This section is organized by statutory act or major policy area. Each program direction includes a brief background discussion and then lays out FY 1983 Regional/State activities and Headquarters activities. Each Headquarters activity is referenced to a specific quarter in FY 1983 in which it will be complete or available.

### A. Clean Water Act

#### 1. Overview

The Clean Water Act recognizes that it is the primary responsibility of the States to prevent, reduce, and eliminate water pollution. The States determine the desired uses for their waters; set standards; identify current uses; and, where uses are being impaired or threatened, develop plans for the protection or restoration of the designated use. States implement the plans through control programs such as permitting, enforcement, construction of municipal wastewater treatment works, and nonpoint source control practices. The Act also calls for the reliance on technology-based effluent limitations for control of industrial and municipal point sources of water pollution. If designated uses will not be attained through the technology limits established, the States must either seek a greater level of control or re-examine the attainability of designated uses.

EPA is dedicated to and recognizes the importance of completing guidelines for uniform technology-based controls. Under this technology-based approach, the Agency establishes standards for major industries discharging directly into navigable waters or indirectly into publicly-owned treatment works (POTWs) by issuing standards based on best practicable technology (BPT), best available technology economically achievable (BAT), best conventional technology (BCT), as well as new source performance standards (NSPS), and pretreatment standards for new and existing sources. EPA has completed most of the technical and economic studies which provide the basis for these effluent guidelines, and EPA plans to promulgate guidelines for all major industries by 1984.

Along with completion of its effort to establish the uniform technology-based BAT guidelines, EPA will emphasize the implemen-



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tation of a water quality based approach to pollution control. A water quality based approach will allow States to focus on their priority waterbodies and to provide adequate water quality protection beyond what will be achieved through technology-based controls. Where designated uses are being attained, EPA maintains its anti-degradation policy. In re-emphasizing a water quality based approach, certain basic questions must be considered:

1. What is the use to be protected?
2. To what extent does pollution contribute to the impairment of the use?
3. What is the level of point source pollution control necessary to restore or enhance the use?
4. What is the level of nonpoint source pollution control necessary to restore or enhance the use?

Answering these questions is critical to defining what is actually meant by the terms "use" and "water quality problem" and to developing plans to resolve problems. States and locals should understand and utilize the answers to these questions as they undertake their water quality based approach. In undertaking this approach, States must first identify water quality limited waterbodies under section 303(d) and prioritize these waterbodies, taking into account the severity of pollution and the uses of the water. This priority ranking provides a framework within which States can consider their most pressing water quality needs and identify subsequent water quality management (WQM) activities necessary to meet their water quality goals.

Following this priority ranking, States should define their water quality goals by setting attainable standards for their waters under section 303(c). In FY 1983, EPA is encouraging States to select priority waterbodies or segments for review, rather than review all State water quality standards every three years. In FY 1983, the Agency also encourages development of site-specific criteria, by which a State may modify the EPA laboratory-derived section 304(a)(1) criteria to reflect local environmental conditions. States may also conduct a use attainability analysis to fully consider the environmental and economic factors impacting the attainment of their water quality standards.

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Once standards are set, States should prepare wasteload allocations (WLAs) and total maximum daily loads (TMDLs), emphasizing priority segments first.

Using the information generated in setting water quality standards, the States will certify or issue National Pollutant Discharge Elimination System (NPDES) permits. In developing and issuing permits, permit writers should use the following three principles: (1) permits are of lasting value; (2) permits are based on good science; and (3) ample opportunities for input are provided. Permit limits are based on effluent guidelines, on total maximum daily loads and wasteload allocations, and on best professional judgment where national standards are not established. The two largest implementation problems for the NPDES permit program are: (1) the volume of permits that need to be reissued; and (2) the uncertainty involved in developing BAT limits in the absence of promulgated guidelines. EPA has developed a second round industrial permitting strategy to address these implementation problems. The second round permitting strategy focuses on issuing permits where BAT guidelines have been issued or will never be issued and in areas with known or suspected impairment of use attributable to water pollution. Permits should also be issued where serious violations are obviously occurring.

Monitoring is the basis for the above mentioned activities. EPA is developing a monitoring strategy which will place greater attention on: (1) generating a data base adequate to support critical decisions; (2) encouraging local government and industry involvement in data gathering; (3) increasing EPA's involvement in technical guidance and support; (4) encouraging the use of selective biological surveys as opposed to widespread chemical sampling; and (5) measuring the results of clean-up programs. The principal objective of the monitoring strategy is to develop and use data to set standards and treatment requirements where costs bear a reasonable relationship to benefits on a site-specific basis. The section 305(b) report will be the basic document identifying each State's water quality status and needs. The 305(b) report will also enable States and EPA to monitor progress toward achieving water quality goals and environmental results.

2. National Program Directions

a. Water Quality Management Planning

The revised Water Quality Management (WQM) regulations (Part 130) will stress the continued importance of the planning process in water quality decision-making. The planning process outlined in the Clean Water Act provides a framework for water quality decision-making.

Each State should develop its planning agenda based upon its individual planning needs for its priority waterbodies. States should coordinate with designated areawide agencies while designing their planning agenda. The two major emphases for FY 1983 in planning are: (1) the examination by States of their continuing planning process (CPP) document; and (2) utilization of WQM plans, through consistency reviews, to make proper implementation decisions.

Regional/State Activities

In FY 1983, States and Regional Offices will ensure that the planning process is properly described and operational.

- o States should update their CPP as necessary, giving special attention to the following process descriptions:
  - determining priority waterbodies
  - identifying water quality limited segments
  - conducting TMDLs and WLAs
  - revising water quality standards
  - conducting water quality monitoring activities and developing monitoring strategies
  - developing the construction grants priority list
  - reviewing NPDES permits and construction grant awards for consistency with WQM plans
  - completing the FY 1984 305(b) report.
- o Regions and States should agree upon the process by which WQM plans will be used to review NPDES permit and construction grant decisions. Areawide agencies with certified and approved plans must be afforded a consistency review as part of their planning commitment. If the

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areawide plan is silent on this review, the State should carry-out the consistency review.

- Regions and States should continue to develop and implement nonpoint source controls programs in priority waterbodies.

Headquarters Activities

In FY 1983, Headquarters will:

- Provide guidance to assist States in updating their CPPs. (First Quarter)
- Coordinate WQM-related guidance to assure consistency with the revised WQM regulations and this document and clarify interrelationships of such guidance. (First Quarter)

b. Monitoring

EPA and the States must ensure that environmental decisions are based on sound scientific data and information. EPA believes that the amount of good quality, local site-specific information will be strongly influenced by the degree to which local participants, including areawide agencies, municipalities, and the regulated community, are involved in the design and implementation of monitoring programs. Therefore, EPA Headquarters, with assistance from Regional and State staff, is developing a water monitoring strategy which will greatly improve the quality of information available for water quality decisions and will make more effective use of local, State, and Federal resources for collecting, analyzing, and interpreting monitoring data. This strategy will stress the following changes to existing State monitoring programs: (1) an emphasis on biosurveys and bioassays to facilitate the analysis of impaired aquatic life uses; (2) increased emphasis on local participation in the design and implementation of monitoring programs; (3) increased use of intensive surveys to help analyze causes and effects of water quality problems; and (4) decreased emphasis on routine ambient chemical-by-chemical monitoring.

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Regional/State Activities

In FY 1983, the States, with assistance from EPA Regional Offices, should:

- Develop and implement monitoring strategies to make the best use of limited monitoring resources and to collect the information needed for developing realistic site-specific controls. The strategies should address: (1) identifying priority waterbodies; (2) collecting data to make water quality standards and TMDLs/WLAs decisions; and (3) establishing cooperative sampling and analysis programs with local, State, and Federal participants.
- Participate with EPA Headquarters in revising the Basic Water Monitoring Program.
- Agree with the Regional Office on the format and content of the State section 305(b) reports due April 1, 1984.
- Implement quality assurance procedures.

Headquarters Activities

In FY 1983, EPA Headquarters will:

- Complete its revision of user-oriented guidance, the Basic Water Monitoring Program, to assist States in managing their water monitoring programs. (Third Quarter)
- Provide technical guidance and assistance for local cooperative sampling programs. (Third Quarter)
- Provide guidance on the use of the Aquatic Life Survey and other approaches to assist in preparing section 305(b) reports and other requirements. (Second Quarter)

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c. Water Quality Standards

The implementation of a revised water quality standards regulation will provide a general mechanism for the States to use in integrating programs authorized by the Clean Water Act. The "Municipal Wastewater Treatment Construction Grant Amendments of 1981" link construction grant decisions to water quality standards by requiring that after December 1984, a State must complete its revision of the water quality standard for any segment affected by a construction grant before the grant is awarded. The changes in the water quality standards program will provide a general process for determining the attainable uses of a waterbody, will be scientifically based, and will also give States increased flexibility to consider both economic and environmental factors relating to the attainment of designated water uses. Once a State determines that a use is being attained, that use cannot be lowered. The result of these efforts will be to more effectively direct public and private funds for environmental clean up.

Regional/State Activities

In FY 1983, States and Regional Offices will implement the revised water quality standards regulations.

- Regions and States will analyze the attainability of uses based on environmental, technical, and economic factors.
- Regions and States will review and possibly modify the existing water quality standards for priority waterbodies.
- States must develop and adopt a Statewide anti-degradation policy to maintain those water uses which are currently being attained.

Headquarters Activities

In FY 1983, EPA Headquarters will continue to implement the revised water quality standards regulation by assisting the States and Regional Offices in determining attainable water quality standards for specific sites through guidance documents and water quality standards reviews. Headquarters will:

- Provide guidance and technical assistance for designating appropriate attainable uses (including environmental benefits assessments) and for developing criteria, pro-

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protective of these uses, which reflect local environmental conditions. (Second Quarter)

- Develop guidance for conducting waterbody surveys and assessments for analyzing the attainability of uses. (First Quarter)
- Issue sediment criteria identifying harmful levels of pollutants in sediment which would be released into the aquatic environment and impair water quality uses. (Fourth Quarter)

d. Priority Waterbodies

The States and EPA need to focus their attention and resources on those waterbodies which: (1) have the greatest water quality problems in terms of impaired water uses; (2) have a high existing or potential economic or social value; and (3) provide the greatest margin of environmental protection for the resources expended. Priorities may include segments where advanced treatment and combined sewer overflow funding decisions are pending, permit revisions are scheduled or toxics have been identified or are suspected of precluding a use and are posing an unreasonable risk to human health. This prioritization will enable the States and EPA to assure that water quality based control decisions in these areas, including standards setting, planning, and permitting, are made on the basis of sound scientific data. States, through their negotiations with EPA Regions concerning their CPP and their sections 106 and 205(j) work programs, should update and submit a list of priority waterbodies within the State which will receive attention for water quality based controls. This list will be included in the States' CPP submissions and section 305(b) report. The list will be used to set priorities for: (1) collection of field data needed to make decisions; (2) revision of water quality standards; (3) establishment of TMDLs/WLAs; (4) issuance of water quality based permits; and (5) construction grants.

Regional/State Activities

In FY 1983, the States, with assistance from EPA Regional Offices, will:

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- Identify and prioritize waterbodies using the 305(b) report where possible. These lists should be submitted to EPA to aid in the prioritization of the FY 1984 State and EPA activities.

Headquarters Activities

In FY 1983, EPA Headquarters will provide guidance and technical assistance to Regions and States, including:

- Completion of technical guidance on techniques which may be useful for screening and identifying water quality limited waterbodies. (Third Quarter)
- Provide limited assistance in the use of the River Reach File and the Aquatic Life Survey to help organize information on waterbodies in a format useful for screening and priority ranking. (On-going)
- Assist Regions and States in addressing significant water quality and public health concerns, particularly showing progress to date in priority waterbodies and measuring future improvements. (On-going)

e. Total Maximum Daily Loads (TMDLs)/Wasteload Allocations (WLAs) (303(d))

The development of TMDLs is a key step in the process of planning for appropriate levels of controls to achieve designated uses. EPA is reasserting this basic requirement of section 303(d) because it strongly believes that the data collection and analysis to produce TMDLs and WLAs provide the primary information needed to answer three of the basic questions posed in the overview: To what extent does pollution contribute to the impairment of the use? To what extent will control of pollution from point sources restore or enhance the use? From nonpoint sources? Section 303(d) provides the overall planning context which enables the States to develop reasonable permit limits derived from water quality criteria necessary to meet designated uses. Alternative forms of setting limitations, such as the use of biological monitoring as a surrogate, can be developed.



Regional/State Activity

In FY 1983, the States, with assistance from the Regions, should undertake the following activities:

- Conduct TMDLs/WLAs in priority waterbodies.
- States, working with the Regional Offices, are encouraged to update their CPP to cover:
  - a description of the States' process for conducting TMDLs/WLAs, including public involvement
  - an agreement on the Regional Office review role
  - a schedule of implementation, based upon priority waterbody determination
  - integration of the State implementation of TMDLs/WLAs, where the Region is the permitting authority
  - a description of other accepted methods for setting discharge limits, including bio-monitoring.
- Identify the extent uses are being impaired by point and nonpoint sources.

Headquarters Activities

In FY 1983, EPA Headquarters will continue to:

- Issue detailed technical guidance on conducting TMDLs/WLAs, including guidance for toxic pollutants. (First Quarter)
- Issue guidance for use of biological monitoring in setting permit conditions. (Third Quarter)

f. Advanced Treatment Reviews

In response to Congressional direction, the Agency conducts reviews of Advanced Treatment (AT) projects to determine whether proposed AT projects will result in significant water quality improvements. During FY 1983, the Agency will conduct the AT reviews in accordance with the revised AT Review Policy, which reflects the Agency experience over the past three years in conducting AT reviews. Before grants are awarded for AT projects, justification criteria contained in the new policy must be met, including an assessment of the significance of the water quality improvements that takes into account the designated use being

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impaired, the effect point source pollutants have on the impairment of the use, and the contributions toward restoration of the use that the project will make. AT reviews will ensure that significant improved uses of receiving waters will result from funded AT projects, while avoiding unnecessary municipal and Federal expenditures when reasonable benefits cannot be demonstrated.

Regional/State Activities

In FY 1983, the Regions and States will:

- Identify municipal dischargers that will require the construction of AT facilities, based on identified water quality limited stream segments.
- Determine a need for revised WLAs and establish a priority ranking for those stream segments. Notify potential grantees of pending WLA revisions and provide an opportunity for the grantee to develop scientific site-specific data to support the proposed effluent limitations.
- Conduct AT project reviews for projects with incremental AT costs of less than \$3 million in accordance with the revised AT Review Policy.
- Submit AT projects with incremental AT costs of greater than \$3 million to Headquarters in a timely fashion.
- Conduct analyses of water quality improvements from AT facilities, under a program of "before and after" studies.

Headquarters Activities

In FY 1983, Headquarters will:

- Review all AT projects with incremental AT costs of greater than \$3 million. (On-going)
- Evaluate Regional and State AT project reviews under the revised AT Review Policy for consistency. (Third Quarter)

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- Issue methodology for reviewing and revising existing AT permits. (First Quarter)
- Issue guidance and coordinate analyses of water quality improvement from AT facilities, under a program of "before and after" studies. (Second Quarter)
- Issue updated technical guidance for use by Regions and States in analyzing and justifying AT projects. (Third Quarter)

g. State Delegation

A central feature of EPA's management approach is to transfer authority and program responsibilities to the States. Encouraging State implementation is a central element in EPA's philosophy of dealing with water quality problems closer to the level where they exist, thereby enhancing not only the knowledge of the problem but also the concern for improvements. EPA is revising the NPDES program approval regulations to simplify equivalency requirements and to provide more flexibility.

Regional/State Activities

In FY 1983, Regions must continue to work with the States to identify and remove remaining barriers to State assumption and maintenance of programs.

- Working with the States, the Regions should develop a strategy to assist States in assuming and maintaining program delegation for all programs by expediting program development, review, and approval processes. This should include an analysis of the impacts of the new regulations.
- In the NPDES program, the Regions should work to approve State program submissions requesting full NPDES program administration and work to approve program modification requests for implementing the pretreatment and Federal facilities programs.
- Regions are expected to complete delegation of all construction grant activities which may be delegated

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to the States or assign them to the Corps of Engineers (COE) in 25 States.

Headquarters Activities

Headquarters will undertake a number of activities to assist Regions and States in the transfer of program authority. Headquarters will:

- Revise and implement the permit regulations to provide more flexibility for States to receive program authorization. (Fourth Quarter)
- Implement a fast track program approval procedure for NPDES. (Fourth Quarter)
- Develop, with Region and State participation, a policy statement on roles and responsibilities under delegation, including Office of Water oversight guidelines. (Second Quarter)
- In coordination with this document and the Accountability System, perform national oversight of construction grant State delegation consistent with the revised 205(g) regulations. (On-going)
- Provide guidance to the Regions on the extent and structure of State delegation and oversight. (Second Quarter)

h. Construction Grants Management

During FY 1983, EPA will continue the FY 1982 environmental and management emphasis for the construction grants program to implement the Clean Water Act amendments and new Agency management initiatives. The regulations and guidance for the 1981 amendments will be completed in FY 1982, with full implementation in FY 1983. Major emphasis will be placed on water quality/public health improvements and restoration of uses in project priority and funding decisions. There will be a shift of major management responsibility to the States, as well as a reorientation of Federal, State, and local management activities to reflect the 1981 amendments and

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management initiatives, particularly in the areas of the elimination of Step 1 and 2 grants, fulfilling National Environmental Policy Act (NEPA) requirements and meeting the 45-day EPA review of grants. The Agency will be emphasizing results-oriented management and efficient use of EPA, State, and Corps of Engineers resources.

Regional/State Activities

In concert with the water quality standards, water quality management, and permit programs, a coordinated program of improving water quality/public health in critical waterbody areas involving municipal wastewater treatment funding will be implemented. Specific priority activities are as follows:

- Develop Regional/State agreements to identify phased/segmented projects and State funding strategies.
- Develop a method for implementing Regional and State programs to:
  - utilize Corps of Engineers resources fully and effectively
  - eliminate the backlog of projects in need of completion and closeout
  - manage obligations and outlays
  - address Federal grant award responsibilities, including NEPA, innovative/alternative technology program, and advanced treatment projects
  - complete 45-day approval of grants
  - bring all completed facilities into compliance with design/permit requirements within one year of construction completion.
- Ensure selection of affordable and operable technologies for small communities taking into consideration the revised treatment definition for secondary.
- Implement procedures to maintain program integrity (i.e., prevent waste, fraud, and mismanagement in the program).
- Review and revise State construction grant priority systems to ensure incorporation of State's priority waterbodies.

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- Identify priority waterbodies where existing impaired uses may be improved significantly by municipal construction.

Headquarters Activities

The Headquarters activities primarily involve national management, oversight, and assistance to Regions and States. Specific activities are as follows:

- Provide national management of obligations and outlays. (Monthly)
- Provide national management of procedures to eliminate backlog in the program (i.e., completions/closeouts, audits, change orders, claim resolution). (Quarterly)
- Oversee programs to ensure technologically appropriate projects, including effective use of I/A and small community setasides. (On-going)
- Issue guidance for reviewing, revising, and developing priority systems and lists. (First Quarter)
- Provide oversight/assistance on phased/segmented projects and other Step 2+3/3 assistance to Regions/States. (On-going)

i. Financial Management Capability

The construction and operation of a wastewater treatment facility to meet the enforceable requirements of the Clean Water Act is often the largest capital improvement and public enterprise undertaken by a community. Financial issues related to costs, revenues, structure of the financing, debt recovery, expansion, and impact on users are critical to the successful operation of the treatment works and the achievement of intended environmental results.

The Clean Water Act requires applicants for construction grant awards to have the "... managerial and financial capability to ensure adequate construction, operation, and maintenance of treat-

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ment works throughout the applicant's jurisdiction, as determined by the Administrator." The requirement for applicants to demonstrate financial management capability is in the construction grants regulations. To implement this requirement the Agency has drafted a policy statement on financial management capability that affects proposed projects, projects under construction, and operational facilities. One major purpose of the policy is to ensure that grantees are aware of a project's costs and its financial impacts on the community and its residents before applying for a grant for building municipal treatment works. Also, if an operational treatment plant is in significant non-compliance with its NPDES permit, the State may review the adequacy of the operator's revenue system. Applicable laws and regulations must also be followed when acquiring real property for projects receiving Federal funds.

Regional/State Activities

The States will have the primary responsibility for assuring the demonstration of financial management capability. Draft worksheets and guidance have been prepared concurrently with the policy statement.

- States should modify the worksheets to more fully meet their needs to tailor national guidance in accordance with States statutes.
- Regions and States should conduct reviews of all Step 3 grantees and make a determination that the applicant has demonstrated financial and management capability to construct, operate, and maintain the proposed facilities.
- Regions and States should screen all PL 92-500 facilities under construction or operational and all projects proposed for Step 3 funding, 1 MGD and less to assess appropriateness of technology.
- Regions and States should notify all grantees of the financial management capability policy and subsequent demonstration.
- Regions and States should screen and review all projects calling for land acquisition for adherence to Federal laws.

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Headquarters Activities

EPA Headquarters will focus on providing assistance to Regions on financial management issues and evaluating Regional performance. Headquarters will:

- Review Regional/State land acquisition activities. (Third Quarter)
- Prepare guidance further defining Regional roles/responsibilities, and conduct additional workshops/seminars on financial management capability, as resources permit. (Third Quarter)
- Assist with identifying and trouble-shooting high-cost projects. (On-going)
- Disseminate information on appropriate technologies for small communities. (On-going)

j. Permitting

In FY 1983, EPA and the States will be faced with a number of competing needs, including: (1) issuance of permits to protect the environment; (2) removing the legal vulnerability of dischargers from expiring permits (especially where NPDES States do not have provisions to extend expired permits); (3) reducing uncertainties of permit requirements and timing for permit issuance; and (4) developing permits that reflect good science and limitations that will not be subject to frequent change. In addressing these needs, the permit should represent the final step in a series of actions and considerations including, for example, BAT guidelines promulgation and a thorough analysis of waterbodies with suspected or actual water use impairment.

EPA recently completed a detailed policy for second round permitting. This policy requires the use of procedures reflecting the best science available. Major emphasis is placed on development of a priority listing of industrial facilities discharging to areas where water impairment exists or is suspected. Permits in areas where water use impairment is known should be issued expeditiously. Regions and States should also address areas where water use impairment is suspected. In these areas, additional chemical and



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biological monitoring requirements may be required in permits, and a more thorough analysis of water use impairment must be made. Once sufficient information exists, permit limitations should be developed and the permit modified accordingly. As BAT guidelines are promulgated in FY 1983, permits should also be issued to reflect these requirements. In addition to this major emphasis placed on industrial permitting, it will also be necessary to focus on modification, as appropriate, of municipal permits to reflect the amendment to section 301(i) of the Clean Water Act, to reflect the new definition of secondary treatment, and to implement the pretreatment program. We are also encouraging the Regions and States to use general or areawide permits, where appropriate, to cover many facilities with similar operations and waste-stream discharges.

Permits are a management tool to ensure that municipalities are moving forward on a schedule to meet the enforceable provisions of the Clean Water Act. Special attention will be given to coordinating municipal permit compliance schedules with grant agreements and conditions and in tracking the grantee's progress according to these schedules.

Regional/State Activities

Industrial Permits

- Regions will work with States to develop and update, as necessary, a strategy to reduce the number of expired permits, which includes priority lists for industrial permit reissuance by NPDES States.
- Regions and States will issue permits in accordance with the priority lists and promulgated effluent guidelines.
- Regions will issue general permits, as appropriate, to facilities with similar discharges and monitoring needs.
- States will develop and/or modify second round permitting strategies by the end of FY 1983 to address FY 1984 permit issuance.

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Municipal Permits

- In early FY 1983, Regions will develop priority lists of those permits requiring modification or issuance by EPA.
- Regions will work with States to develop priority lists of those permits requiring modification of issuance by NPDES States.
- To the extent possible, Regions will modify municipal permits to reflect 301(i), revised secondary treatment definition, and required pretreatment schedules.
- Regions should ensure that technically sound water quality based permits are issued for AT facilities.
- Regions and States will coordinate schedules for construction with permit compliance schedules to ensure consistency and track implementation progress.

Headquarters Activities

Industrial

- Headquarters will expedite procedures for general permit promulgation and will develop a national model for general permits for appropriate industrial categories. (First Quarter)
- Headquarters will continue to develop and promulgate effluent guidelines for major industries in FY 1983. (On-going)
- Headquarters will provide technical guidance and assistance to Regional and State permit writers in interpreting the guidelines. (On-going)

Municipal

- Headquarters will revise the definition of secondary treatment to incorporate changes mandated by the 1981 amendments. (Second Quarter)
- Headquarters will provide guidance and assistance to Regions and States concerning the implementation of the general pretreatment program, especially in response

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to the Regulatory Impact Assessment (RIA) recommendations.  
(Second Quarter)

k. Compliance

A major emphasis is to improve the compliance rate for municipal permittees. This effort will focus on implementing the Municipal Compliance Improvement Strategy (MCIS). The major emphasis is to assure that federally funded treatment facilities are operated and maintained properly and, in the case of non-compliance, that municipalities take adequate steps to correct design or other deficiencies. EPA has the responsibility to assure that all municipalities involved in the construction grants program are adequately prepared to manage the operation and maintenance of their newly constructed facilities in compliance with applicable NPDES permit requirements throughout the useful life of the facility. Where significant non-compliance persists, administrative enforcement and, if necessary, formal enforcement action should be initiated.

Also of importance will be to maintain, or improve, the relatively high compliance rate of industrial dischargers and to track compliance and take appropriate enforcement action to ensure compliance with schedules in newly issued second round industrial permitting.

Regional/State Activities

- Regions will work with States to develop State-by-State compliance strategies, including plans for inspections and follow-up instances of non-compliance.
- Regions will increase use of administrative enforcement tools to resolve instances of non-compliance where other assistance/administrative actions are unsuccessful.  
(In this regard, special attention will be given to the Municipal Compliance Improvement Strategy.)
- Regions will develop referrals for court action and provide technical support on enforcement litigation where negotiations and administrative enforcement do not result in compliance.

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- Regions will maintain and improve the quality of data in the Permit Compliance System (PCS) which will be used as the official source of information on the status of NPDES permits.
- Regions will provide guidance to States on the operations and maintenance (O&M) provisions of 1981 amendments (principally performance certification) and assist States to establish or improve O&M programs.
- Regions will selectively audit State Management Systems developed under the Enforcement Management System (EMS), the Municipal Management Strategy (MMS), and any other compliance-related activities.
- Regions will track performance of newly completed grant funded publicly owned treatment works (POTWs) for the first year of operation.

Headquarters Activities

Headquarters is responsible for national management of compliance-related activities providing guidance and oversight of Regional and State programs. Headquarters will:

- Provide guidance to assist the Regions in increasing the effectiveness of compliance inspections to improve the enforcement presence. (Second Quarter)
- Provide guidance to Regional Offices and States regarding performance aspects of the construction grants program, including engineering performance certification issues to improve compliance. (Third Quarter)
- Participate in the Office of Research and Development (ORD) program to provide feedback on POTW design problem information to Architectural/Engineering firms. (On-going)
- Selectively audit Regional Enforcement Management System (EMS) and other NPDES compliance and administrative enforcement activities. (On-going)

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- Provide guidance on how to deal with compliance and enforcement of existing permits in light of a revised definition of secondary treatment. (Dependent upon issuance of revised definition of secondary treatment)

**B. Safe Drinking Water Act**

**1. Overview**

The Safe Drinking Water Act provides the framework for a national program to assure the safety of drinking water supplies. The Act established programs to protect public health by ensuring the quality of drinking water provided by the Nation's public water systems and to regulate injection wells to avoid contamination of ground water sources of drinking water. The legislation provides for delegation of implementation responsibilities for both programs to the States.

In the Public Water Systems Supervision program, EPA has three major FY 1983 priorities for the States and Regions: (1) to extend the coverage of trihalomethane (THM) regulation to systems serving 10,000 to 75,000 people and to ensure that the microbiological quality of the water is fully protected in the process; (2) to effectively respond to incidents of the detection of significant contamination of ground water sources with unregulated contaminants; and (3) to continue to improve compliance by small systems with the existing standards, giving highest priority to the most serious threats to public health. The program has been underway for a number of years and already includes a high level of State delegation.

The Act also sets up a program to protect underground sources of drinking water from endangerment through well injection. This program is in a much earlier stage of implementation. Program regulations were promulgated in 1980, a legal challenge was settled, and the regulations amended early in 1981. The Underground Injection Control (UIC) program establishes an analogous Federal-State relationship for implementation. EPA expects additional States to assume primacy during FY 1982; however, it is likely that some States will still be working toward it in FY 1983. Thus, the major FY 1983 priorities are: (1) to continue to encourage additional States to assume primacy; (2) to begin direct implementation by EPA in non-primacy States and on Indian lands; and (3) to provide oversight and assistance to primacy States as needed.

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2. National Program Directions

a. Public Water Systems Supervision Program

The Safe Drinking Water Act gives EPA the responsibility of establishing standards for ensuring the safety of the drinking water while encouraging the States to accept primary enforcement responsibility (primacy) for implementing these programs. If a State does not elect to assume primacy, EPA must implement a program in the State. In FY 1983, EPA will emphasize State primacy of the drinking water program in the seven States which do not already have the program. EPA must also provide oversight and technical assistance to States with primacy.

Regional/State Activities

The Regions/States will:

- Foster the monitoring for THMs in systems serving between 10,000 and 75,000 people (required by existing regulation). Provide technical assistance on monitoring for THMs and make sure that the effectiveness of disinfection is not endangered by attempts to control THMs.
- Respond to the detection of instances of serious ground water contamination impacting public water supplies. This will require the capacity to analyze and confirm samples, to assess the seriousness of the health threat (using EPA's Health Advisories where appropriate), to investigate the possible sources of the contamination, to evaluate alternatives for affected public water systems, and to ensure that serious health risks are dealt with effectively.
- Improve compliance with existing drinking water standards, particularly among small systems, using the approach outlined in EPA's Compliance Strategy. The strategy will stress voluntary compliance and will emphasize prioritization of follow-up based on the seriousness of the related public health risks.

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- Implement a program in non-primacy States and on Indian lands.
- Encourage the remaining seven non-primacy States to assume primacy.
- Investigate persistent violators and initiate legal action against recalcitrant violators of the Primary Drinking Water regulations in non-primacy areas, as appropriate.
- Initiate emergency enforcement actions where necessary.

Headquarters Activities

Headquarters will continue to:

- Support Regional ground water contamination activities by developing additional health advisories and treatment information on unregulated contaminants. (On-going)
- Foster public debate in the control of Volatile Organic Chemicals (VOCs) which include the contaminants most frequently detected at high levels in ground water sources (follow-up on recent Advanced Notice of Proposed Rulemaking (ANPRM) on VOCs). (On-going)
- Develop guidance on compliance data, verification, analysis, and use. (First Quarter).

b. Underground Injection Control (UIC) Program

In FY 1983, EPA will actively work with the States in their efforts to assume primacy by providing technical assistance and review of program plans. In those States which will not assume primacy and on Indian lands, the Regions are developing the necessary framework for direct Federal implementation of the UIC program. By FY 1983, forty States are expected to have primacy for the UIC program. It will be the first full year of Regional implementation in non-primacy States and on Indian lands.

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Regional/State Activities

Activities in FY 1983 will focus on:

- Continuing to encourage additional States to assume primacy.
- Directly implementing programs in non-primacy States and on Indian lands, including issuing permits for new and existing injection wells that are required to have permits under the UIC regulations and enforcing the regulations in non-primacy States. These activities will occur in an environment of limited resources, making hard choices and clear priorities necessary.
- Developing a Regional strategy for oversight of primacy States and providing assistance where requested.

Headquarters Activities

FY 1983 will be the first full year of implementation of the UIC program. While a number of guidance documents have been developed to support Regional implementation activities, Headquarters will:

- Continue to expedite review of State primacy applications. (On-going)
- Assist Regions in establishing direct implementation program and issuing permits in non-primacy States and on Indian lands. (On-going)
- Review data collected by the States and Regions to determine whether regulatory changes are desirable or necessary. (On-going)
- Develop guidance on implementation issues including data management, permit issuance, compliance tracking, inspections, and enforcement. (On-going)

C. Ocean Dumping and Discharge Regulation

1. Overview

The Marine Protection Research and Sanctuaries Act (MPRSA)



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authorizes the Agency to issue ocean dumping permits to potential users able to meet environmental criteria and other statutory factors, including the need for the proposed dumping. The Agency's approach to implementing this statute is provided in the ocean dumping regulations. The regulations will undergo re-examination in FY 1982 and FY 1983. MPRSA reauthorization is expected in late FY 1982 or FY 1983. The Agency may seek authority to recover the Agency's program costs for ocean disposal.

Under section 301(h) of the Clean Water Act, EPA is authorized to grant waivers from secondary treatment requirements to municipalities which can demonstrate that their discharges will not harm aquatic life or jeopardize other beneficial water uses. Under the 1977 amendments, EPA has been evaluating 30 major 301(h) waiver applications. Congress recently amended the law to remove some of the prohibitions in EPA's 301(h) regulations, to prohibit discharge of sludge, and to reopen the application period for a year.

2. National Program Directions

a. Marine Protection Strategy

In FY 1983, the Office of Water will develop a marine strategy which will identify the relationships between the Office of Water's marine programs--including ocean dumping, 403(c), incineration-at-sea, and 301(h). This will include criteria, standards, and monitoring activities for estuarine waters. The objective of this effort is to provide for a well-coordinated, integrated marine program. In addition, the Agency is re-examining the ocean dumping regulation. Environmental and economic tradeoffs will be considered on a case-by-case basis in assessing the need for and acceptability of waste for ocean disposal and in determining unreasonable degradation to marine waters. Emphasis will be placed on: (1) improving the Agency's scientific capability to predict the effects of ocean dumping of materials; (2) completing the environmental impact statements for dredged material sites and improving guidance for characterizing appropriate types of dredged materials for appropriate sites and methods; and (3) improving the Regions capability to conduct reviews. EPA will initiate development of an integrated sludge strategy which will provide, among other things, a better basis for evaluating sludge disposal options--including ocean dumping.

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Regional/State Activities

The Regional Offices and States will implement the marine protection strategy by:

- Reviewing applications to COE for ocean dumping of dredged materials for compliance with ocean dumping criteria.
- Managing ocean dump sites assigned to the Region in accordance with 40 CFR 228.
- Processing applications and issuing permits for ocean dumping of non-dredged material.
- Issuing general/individual NPDES permits for offshore discharges.
- Determining unreasonable degradation and irreparable harm of the marine waters using 403(c) criteria for the issuance of NPDES permits to ocean waters.

Headquarters Activities

In FY 1983, EPA Headquarters will:

- Complete revisions to the ocean dumping regulation and provide technical assistance to interpret the revised 403(c) guidance. (Second Quarter)
- Implement the strategy which will provide for a coordinated marine program. (First Quarter)
- Provide guidance and technical analysis to the States in determining the impacts of dischargers on marine waters in support of ocean discharge NPDES activities, 301(h) waivers, and the water quality criteria program. (First Quarter)
- Review quantitative criteria and modify as necessary for the selection of ocean disposal sites for dumping dredged material and initiate development of criteria for other types of waste material which pass the environmental criteria (e.g., sewage sludge, industrial wastes). (Second Quarter)

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- Develop and implement a monitoring program for ocean dumping related activities. (First Quarter)
- Develop guidance and assistance to the Regions in the determination of unreasonable degradation and irreparable harm of the marine waters for the issuance of NPDES permits. (Third Quarter)
- Determine environmental indices for assessing impacts of dumping particular wastes. (Third Quarter)
- Review and make determinations for research and emergency permit applications for ocean dumping. (On-going)
- Complete site designation process for historic ocean dump sites. (On-going)
- Develop vessel certification and incineration-at-sea protocol. (First Quarter)
- Develop permits for incineration-at-sea. (On-going)
- Develop a system for classifying and evaluating marine "areas of biological concern." (Second Quarter)
- Develop section 403(c) permit conditions for deep sea-bed mining. (First Quarter)
- Develop 403(c) permit conditions for Ocean Thermal Energy Conversion (OTEC) activities. (Third Quarter)

b. 301(h) Waivers

Legislative changes and proposed regulatory revisions will now allow between 500 and 1,000 new and revised applications for 301(h) waivers to be submitted. In FY 1983, we expect to process 30 major applications (over 50,000 population or 5 MGD) and 200 minor applications nationwide. The expressed policy in the proposed regulations for the 301(h) program will delegate application decision responsibility to EPA Regional Offices. Monitoring will be implemented to ensure that permit conditions are adhered to and that environmental changes will be detected promptly. Toxic

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control programs will also be implemented, where necessary, to prevent degradation from such discharges.

Regional/State Activities

- States will review waiver application to ensure conformance to State water quality standards or other regulations and work with applicants to resolve areas of disagreement.
- States will issue a statement of support/non-support for waivers.
- Regions, where appropriate, are responsible for waiver processing, decision making, and permit issuance including accepting and processing applications, issuing draft permits, conducting adjudiciary hearings, revising the decision document, and issuing final permits.

Headquarters Activities

Headquarters will be responsible for developing and coordinating an effective and consistent waiver process among its Regional Offices. Our proposed approach will be to:

- Provide nationally coordinated contractual assistance for waiver application evaluation. (On-going)
- Provide national data storage and evaluation services. (On-going)
- Coordinate task force reviews of major/controversial applications with assistance from the EPA ORD. (On-going)
- Train Regional Staff for delegated responsibilities and demonstrate alternative treatment technology to applicants. (First Quarter)

D. Ground Water Protection Policy

1. Overview

EPA now has several statutory programs directed at control of ground water contamination: Clean Water Act, Safe Drinking

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Water Act, Resource Conservation and Recovery Act (RCRA), Superfund, and UIC. In addition, many States have programs and authorities directed at other sources of contamination. In an effort to coordinate these many efforts, EPA is working to develop a new ground water protection policy which is expected to be approved by the Administrator shortly. EPA will begin its implementation in FY 1983. Based on this policy, the Regions will work toward coordination of their activities related to ground water quality protection and the States will be encouraged to do so as well, on a voluntary basis.

2. National Program Direction

a. Ground Water Protection Policy and Coordination

In FY 1983, EPA will begin implementing the Agency ground water protection policy. The Agency is focusing on establishing a framework to obtain maximum health and environmental benefits and to eliminate organizational fragmentation and possible duplication of efforts.

Regional/State Activities

The States will have the major role in the implementation of the ground water protection policy. The Regions will:

- Work to ensure consistency and coordination of activities related to ground water, including Hazardous Waste, Superfund, and UIC programs.
- Encourage States, on a voluntary basis, to develop strategies to coordinate their activities in this area.
- Participate in formulating specific Agency approaches to enhance protection of ground water quality using the full array of tools available under existing legislation. Regions will be included in the development of technical approaches.

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Headquarters Activities

The Office of Water expects to play a key role in this Agency-wide effort. Activities are likely to include:

- Developing approaches for attaining the anticipated goal of ground water protection based on protection of present and future uses. This will include a public dialogue on ways this goal could be implemented in EPA programs and on a State or local level (e.g., exemption of aquifers, ground water classification, etc.). (On-going)
- Identifying and solving inconsistencies in various regulatory activities relative to this goal in the Hazardous Waste, Superfund, UIC, and other Agency programs. (Fourth Quarter)
- Further work with ORD to develop the Agency's research strategy related to ground water protection and to provide better scientific and technical information for dealing with these problems in the future. (On-going)
- Working with other Federal agencies such as the United States Geological Service (USGS) and the Bureau of Indian Affairs (BIA) to coordinate approaches. (On-going)

### III ACCOUNTABILITY SYSTEM

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#### A. Purpose

The purpose of the Office of Water Accountability System is to: (1) evaluate Regional Office performance; and (2) provide Headquarters managers with programmatic information necessary to make future policy decisions. The System will track the national program directions highlighted in detail in Section II.

#### B. Relationship to Administrator's Management Accountability System

The Office of Water Accountability System ties in with the overall Administrator's Management Accountability System. It focuses on program performance and environmental results. The information necessary to satisfy the Administrator's Management Accountability System will be a subset of the quantitative measures contained in this System and will be collected quarterly and provided to the Office for Policy and Resource Management. The Office of Water is in the process of negotiating goals, objectives, and measures that will be tracked in the Administrator's System for FY 1983. Examples of the types of items that will be provided by the Office of Water Accountability System for the Administrator's System for FY 1983 include status of State delegation and POTW and industrial compliance.

#### C. Structure

The Office of Water Accountability System consists of several related components, including:

National program directions are major areas of policy emphasis for implementation in FY 1983. These national program directions are organized by the Clean Water Act, the Safe Drinking Water Act, the Ocean Dumping and Discharge Regulation, and the Ground Water Protection Policy.

Activity areas are State and Regional Office initiatives to implement the national program directions. The Regions will not be expected to address every area (i.e., ocean dumping) during the Program Review. Rather they should use these areas as a guide to address program activities applicable to their own situation. Regions will be asked during the Program Review to indicate which activity area(s) are not relevant.

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Reporting requirements provide the key data and information base for evaluating performance. There are two types of reporting requirements: quantitative and qualitative measures. (See Appendix A.)

- Quantitative measures focus on information needed for program management and do not include workload/budget related information. The budget and workload model information will be collected separately through the budget process. Most of the information needed to satisfy these measures will be obtained through existing management information systems and documents.
- Qualitative measures are those questions which will be asked during the Program Review. The measures are management related. For example, Regional Office oversight of delegated programs or linkages of water quality standards efforts to permits, permits to construction grants. Reporting on every qualitative measure is not mandatory.

It is understood that the Regions must prioritize activities and tailor programs to meet their water quality needs. The lack of Regional activity in certain national program directions may be explained as sound management. However, Regions will be expected to discuss their decision-making process during the Regional Office visit.

The Office of Water has attempted to integrate environmental progress reporting requirements into the System; for example, number of water quality limited segments and percent meeting designated uses. However, the majority of the measures are program management oriented. State section 305(b) reports will serve as the primary document to track water quality results.

#### **D. FY 1983 Implementation Process**

The following briefly describes the proposed methods for implementing the Office of Water Accountability System:



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- Prior to each fiscal year, a limited number of construction grants or other program outputs, such as permits, will be negotiated between Headquarters and the Regions. For any outputs negotiated by Headquarters in advance, Headquarters will provide suitable justification.
- Quarterly information from the Office of Water Accountability System will be submitted to the Office of Policy and Resource Management for inclusion in the Administrator's Management Accountability System.
- During the first and second quarters of the fiscal year, Headquarter's staff will: (1) extract quantitative data from management information systems (e.g., Permits Compliance System (PCS), Grants Information Control System (GICS), and Federal Reporting Data System (FRDS)) operated by the Offices of Water Program Operations, Water Regulations and Standards, Water Enforcement and Permits, and Drinking Water; (2) review documents such as 106/205(j) work programs and State sections 305(b) reports; (3) review annual plans and evaluation results from delegation agreements under 205(g); (4) review other data provided by Regional Offices as necessary; and (5) prepare materials summarizing Headquarters understanding of Regional Office progress to be used as a basis for conducting the Regional Office visits.
- There will be one visit per year in each Region, covering all Office of Water programs. These Regional Office visits will be in the third quarter of the fiscal year (April to June). The Assistant Administrator and management from each program area will participate in these visits. Headquarters will schedule each visit over a three-day period to provide for thorough discussions of all program and related issues.
- The first two days of discussion will focus on national program directions/activity areas. Headquarters Division level managers and Regional Office staff will meet to discuss: (1) Regional Office management; (2) problems and successes in implementing programs, particularly regarding results; and (3) how program efforts are

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integrated to accomplish the evaluation objectives. It is likely that the review will include both joint sessions on cross-cutting issues and separate program meetings.

- As part of the Regional Program Reviews, a "Case Study" session will be held to focus on integrated program management approaches undertaken by the Region to solve problems in high priority waterbodies.
- The Assistant Administrator and the Office Directors will meet with the Regional Administrator and Regional management on the third and final day of the visit to discuss preliminary evaluation results and methods to resolve issues. A portion of the day will also be set aside to obtain perceptions on Headquarters performance and future program directions and policy, including a discussion of the FY 1984 Office of Water Operating Guidance and Accountability System. State participation, while voluntary, is strongly encouraged for this session.
- Headquarters will prepare a report following each visit. These reports will be used by Headquarters as a basis to refocus management priorities and resources for the balance of the year as necessary and by Regions to strengthen Regional management of the program. They will also be used as input into future program planning and policy decisions. An annual report will be prepared summarizing the findings of the Regional evaluations.
- A list of commitments agreed upon by Headquarters during the Regional visit will also be included in the trip report. Headquarters will report quarterly on the status of those commitments to the Regions.
- Throughout the year as the Regional Offices conduct overviews of their State water programs, they should provide a copy of the report summarizing the discussions to the Assistant Administrator for Water.

#### IV OFFICE OF WATER FY 1983 FUNDING POLICY

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##### A. Clean Water Act

The Clean Water Act lays out a water quality management program for States and local governments to use in addressing water pollution control activities. The Clean Water Act includes a number of funding sources which should be effectively utilized and coordinated to avoid duplication. Using these funding sources, States and locals should develop and maintain a base level water quality program which covers the entire range of eligible activities -- i.e., standards development, permitting, compliance, general administration, etc. Within this base program, EPA FY 1983 funding policy stresses flexibility and funding priority to water quality activities on priority waterbodies. Each State should define its base program depending upon its own situation.

While EPA recognizes the need to maintain a base level program, States should direct a portion of their available resources toward priority waterbodies to undertake the necessary water quality planning activities to make implementation decisions. EPA recognizes that each State will have different priorities and needs for WQM funds and will select its priority activities accordingly. States and Regions should use these national program directions as a guide as they negotiate work programs and allocate funds. The Accountability System will track how the States spend their funds, particularly in terms of the increment devoted to national program directions.

In FY 1983, States and local governments should consider the following funding priorities:

- Using sections 106, 205(j), and non-construction grants management 205(g) funds, States must operate a base level water quality program, covering the entire program from problem identification to implementation and evaluation.
- Section 205(j) funds should not be considered a replacement for section 106 funds. States in consultation with areawides should carefully plan for and coordinate the use of section 205(j) funds, especially in support of a water quality based approach which demands water quality planning, standards, and monitoring.

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- Regions should negotiate with the States the increment above the base level which will be directed toward national program directions, outlined in Section II of this document. The national program directions include prioritizing waterbodies, permitting, and financial capability.
- Highest priority for the use of 205(g) funds is construction grants management.
- Section 201 funds are implementation-oriented and support the planning, design, and construction of municipal treatment plants.

**B. Safe Drinking Water Act**

Public water systems grants are used by primacy States to support a wide range of activities to assure the provision of safe drinking water. States should use these grants to: (1) take appropriate actions in cases where water supplies, especially from ground water, are found to be contaminated with unregulated contaminants such as the volatile organics; (2) improve the level of compliance with existing standards, especially by small systems with persistent violations having major public health significance; and (3) extend the THM monitoring to systems serving 10,000 to 75,000 people and assist systems exceeding the maximum contaminant level (MCL) to comply.

Underground water source protection grants support the entire range of State implementation activities under the UIC program. In particular, States should use UIC grants to: (1) review and permit new Class I, II, and III wells and existing Class I and III wells; (2) close shallow hazardous waste disposal wells; (3) conduct review and mechanical integrity testing of existing Class II wells and surveillance and inspection of permitted and closed wells; and (4) assess the impact of Class V wells on ground water quality. Section 1425 States do not have to repermit existing Class II wells but must review and ensure that mechanical integrity tests are conducted.

## **APPENDIX A**

### **ACTIVITIES AND REPORTING MEASURES**

The following includes quantitative and qualitative evaluation measures. These measures will be used during the Office of Water Accountability System Program Reviews. See Section III for a detailed description on how the System works.



NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2a. WATER  
QUALITY  
MANAGEMENT

Update and Improve State  
Continuing Planning  
Process (CPP)

Water Quality Management  
Plans Used for Consistency

- How is the CPP used in the overall management process?
- Are permits and construction grants decisions made in context of the WQM Plan?
- What is process for State/Areaawides consistency review? Are 205(j) and 106 work programs coordinated?
- What is the process for State and locals working jointly to define use of 205(j) funds?
- Discuss nonpoint source (NPS) control program approaches by State.

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2b. MONITORING

Implement the Monitoring  
Strategy

- To what extent is there local/ industrial support for and participation in data collection efforts both for identifying problem areas and monitoring to determine whether uses are being met? To what extent have the States made an effort to work with industry to improve monitoring programs?
- What is the State's oversight role in locally collected data?
- How have Region/States coordinated monitoring activities with other State and Federal agencies?
- How is the monitoring data used? Are biological surveys conducted? For what purpose? How do the States/Region determine the need for biological and toxic monitoring?
- What quality assurance/quality control (QA/QC) procedures are in effect to support such data collection activities?
- What is the mix between fixed station trend monitoring and intensive surveys? What efforts are being made to eliminate unneeded fixed stations?
- Have States incorporated their monitoring strategy in their CPP? If not, why?
- How do intensive surveys which have been conducted relate to priorities (WQS, TMDLs, etc.)?



NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

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A2b. MONITORING  
(Continued)

Improve State Section  
305(b) Report

- What problems are being encountered in implementing the new strategy? What is the Region/State approach to solve them?
- To what extent do Region/States monitor to determine whether uses are being met?
- What is the quality of State Section 305(b) Reports?
- What is being done to encourage effective use as well as quality of State Section 305(b) Reports?

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2c. WATER  
QUALITY  
STANDARDS

Implement the Revised Water  
Quality Standards  
Regulation

- To what extent are revisions to standards based on criteria modification and use attainability studies? Are water quality standards revisions targeted to priority waterbodies? What difficulties have the Region/States encountered in conducting these studies and how have they dealt with them? What have been the results of these studies (redesignated uses, more stringent limitations, etc.)?
- What steps has the Region taken to work with States to implement these new approaches?
- Discuss State anti-degradation policy.

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2d. PRIORITY  
WATERBODIES

Identify and Prioritize  
Water Quality Limited  
Waterbodies

# of water quality limited  
segments and % Meeting  
designated uses (by State)

# of water quality effluent  
limited segments and %  
meeting designated uses (by  
State)

- What is the Region/State process for determining water quality limited segments and setting priorities for control? Is it driven by AWT decisions, permit reissuance, etc., determinations?
- Do State Section 305(b) Reports identify and prioritize waterbodies?
- To what extent are intensive surveys employed in these determinations? Are biological assessments included?

A-7

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*****
*QUANTITATIVE MEASURES DATA SOURCES*
*-----*
* State 305(b) Reports          *
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2e. TOTAL  
MAXIMUM  
DAILY LOADS/  
WASTELOAD  
ALLOCATIONS  
(303(d))

Conduct TMDLs/WLAs

- To what extent are the States conducting TMDLs/WLAs? Are they conducted in priority waterbodies? How are these funded? What difficulties have been encountered and how have the Region/States solved them?
- What is the process for approving TMDLs/WLAs? How well is it working?
- Are TMDLs/WLAs for toxic pollutants being developed? If so, how many are pollutant-specific? How many are based on bioassays? Biological surveys?
- What steps is the Region taking to reach agreement with the States on TMDL/WLA procedures?
- How critical are the NPS problems identified?
- How are they being addressed?
- To what extent are uses being impaired by PS/NPS pollution?

Identify Uses Being  
Impaired by Point Source/  
Nonpoint Source (PS/NPS)  
Pollution

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

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A2f. ADVANCED  
TREATMENT  
REVIEWS

Conduct AT Reviews

- Is the Region following procedures, including technical criteria of AT policy?
- Is the Region/State conducting analyses of water quality improvements from AT facilities under a program of before and after studies?
- Has the Region identified all proposed AT facilities and coordinated necessary actions (monitoring WQS reviews, WLAs, facilities planning) to ensure timely reviews?

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2g. STATE  
DELEGATION

NPDES State Program  
Approval

# of Approved State Programs

- Full NPDES Program
- Pretreatment Program  
Modifications
- Federal Facilities  
Modifications

- What are the obstacles to State NPDES Assumption; pretreatment program; Federal Facility Program?
- What is Region doing to encourage State assumption?

Complete Delegation of the  
Construction Grants Program

# of States with Delegation  
Agreements

% of program workload dele-  
gated to schedule submitted  
at beginning of the year

- What are the obstacles to total State delegation of the Construc-  
tion Grants Program?
- What is Regional Strategy to over-  
come obstacles?
- Have the existing functional  
agreements been revised to reflect  
the new law and regulations?

A-10

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\*QUANTITATIVE MEASURES DATA SOURCES\*

\*-----\*

\* Supplied by Region \*

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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2h. CONSTRUCTION  
GRANTS  
MANAGEMENT

Implement a Regional Manage-  
ment and Oversight  
System

Plan vs. actual workyears  
and expenditures from Corps  
during the year (3)

- Is the COE adequately carrying out its assigned responsibilities? Are commitments on national priorities included in State/Corps oversight systems?

% of records with errors in edit sections of CGMS audit system to total records in data base (1)

- What are State/Corps oversight procedures to guard against waste, fraud, and mismanagement?
- What is the strategy for having Step 3 grant applications from delegated States approved within 45 days?

Manage Program to Meet  
Outlay and Obligation  
Projections

% of cumulative net monthly outlays to cumulative net commitment (2)

% of cumulative net quarterly obligations to cumulative net obligation commitment (2)

Complete and Closeout  
Projects

# of physical completions (plan vs. actual) during FY 1983 (1)

- What was the proportion of backlog projects completed during FY 1983?

# of administrative completions (plan vs. actual) during FY 1983 (1)

- Were projects administratively completed in a timely manner (generally 6 months after physical completion)?

# of audits resolved (plan vs. actual) during FY 1983 (1)

- Are audits being resolved within 120 days of audit completion per EPA Order 2750.2A?

# of closeout (plan vs. actual) during FY 1983 (1)

- Were projects closed out in a timely manner (generally 3 months after audit exceptions are resolved)?

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\*QUANTITATIVE MEASURES DATA SOURCES\*

\*-----\*

\*(1) Grants Information Control \*

\* System \*

\*(2) Financial Management System \*

\*(3) Supplied by Region \*

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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2h. CONSTRUCTION  
GRANTS  
MANAGEMENT  
(Continued)

Assist States in Revising  
Priority Systems and  
Municipal Management System (MMS),  
Where Necessary, and in  
Addressing Significant Water  
Quality/Public Health (WQ/PH)  
Problems

Show Progress in Each State  
Since 1972 in Selected  
Priority WQ/PH Areas and  
Identify Remaining Priority  
Areas

- Have State priority systems been reviewed to determine the extent to which WQ/PH concerns were incorporated?
- Have projects involving significant WQ/PH problems been identified?
- Have significant projects been tracked and expedited through MMS?
- Are the PL 92-500 supported construction in selected priority areas?
- Have WQ/PH improvements in selected priority areas been assessed and documented?
- Have the water quality areas been identified where existing impaired uses can be significantly improved by municipal construction?
- Have systems been developed for reporting the results of municipal construction?



NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2i. FINANCIAL  
MANAGEMENT  
CAPABILITY

Ensure that Projects are  
Technologically Appropriate  
and Within the Financial  
Capability of the Community  
and Users

# and % of small community  
projects prior to Step 3  
grant award screened for  
technical appropriateness

# and % of small community  
projects under construc-  
tion or operation screened  
for technical appropriate-  
ness

# and % of projects with  
financial capabilities  
demonstrated

- What are the alternatives selected?  
Are they technologically appro-  
priate?
- Do applicants have sufficient  
financial management capabilities?
- What actions are taken when a  
potential problem project is iden-  
tified?
- How is the Federal interest  
adequately protected for all real  
property acquired with Federal  
funds?

A-13

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\* Supplied by Region \*  
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\* \*  
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2j. PERMITTING

Issue/Reissue Industrial  
Permits

# of major industrial faci-  
lities for which the permit  
is expired or will expire  
this fiscal year

# of permits issued to major  
industrial facilities during  
fiscal year

- What priority procedures does the Region/State use in establishing industrial permit issuance schedules? (i.e., are Regions following second round permit policy?) How do the priority procedures result in direction of resources to highest water quality problems?  
--in approved NPDES States  
--in non-approved States
- What is States strategy for permit issuance?
- Do the Regions/States identify major industrial permits which will expire each year?
- How are water quality related permit limitations developed?  
--in approved NPDES States  
--in non-approved States

A-14

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\* Permits Compliance System \*  
\* \*  
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\* \*  
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2j. PERMITTING  
(Continued)

Issue/Reissue Municipal  
Permits

# of major municipal facilities for which the permit is expired or will expire this fiscal year (1)

# of major permits issued to major municipal facilities during fiscal year (1)

# of local pretreatment programs submitted for review (2)  
--# approved  
--# denied

# of States with strategy for permit issuance (2)

- What progress is being made by both Region and State adhering to approved agreements? Discuss problems/successes.

- What priority procedures does the Region/State use in establishing municipal permit issuance schedules? How do the priority procedures and modifications result in direction of resources to highest water quality problems?  
--in approved NPDES States  
--in non-approved States

Issue/Reissue General  
Permits

# of general permits issued/reissued \*\* (2)

- What types of problems have Regions encountered in issuing general permits? Explain.

Adjudicatory Hearings

# of adjudicatory hearings requested; held; denied  
--municipal  
--non-municipal (3)

- What were major issues?

A-15

\*\*\*\*\*  
\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\*(1) PCS \*  
\*(2) Region Supplied -\*\*PCS to be \*  
\* modified to incorporate \*  
\*(3) Monthly/Quarterly Status of \*  
\* Hearings \*  
\*\*\*\*\*

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2k. COMPLIANCE

Identify Municipal and  
Industrial Compliance  
Problems and Guide  
Corrective Actions

# and % of major POTWs not in  
compliance with

--construction schedules

- at start of FY
- as of (date)

--final effluent limits

- at start of FY
- as of (date)

# and % major non-municipals  
not in compliance with

--construction schedules

- at start of FY
- as of (date)

--final effluent limits

- at start of FY
- as of (date)

Provide Guidance and  
Assist States to Establish  
O&M Programs

- What progress is being made by both Region and State adhering to approved agreements? Discuss problems/successes.
- How do you determine when to take an action and what action to take against a permittee in non-compliance?
- Discuss reasons for non-compliance.
- How is Enforcement Management System (EMS) used to identify, monitor, and expedite critical projects toward compliance?
- How useful and effective are diagnostic on-line POTW evaluations for improving compliance? Is POTW size a significant factor in the effectiveness of diagnostics? Explain.
- What type of inspection activities are Regions conducting (CEIs, CSIs, PAIs) of major municipal and non-municipal facilities?
- Have the Region or States established a separate identifiable O&M program, adequately staffed and funded?
- What is done to assure that grantees are fully prepared to assume responsibility of operating and maintaining their POTWs?
- Are performance certification requirements being implemented in all States? What are the results to date?

A-16

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\*QUANTITATIVE MEASURES DATA SOURCES\*

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\* Quarterly Non-Compliance Report \*

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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2k. COMPLIANCE  
(Continued)

- Is every proposed project reviewed to assure that the user charge system will adequately provide for the required operation, maintenance, and replacement costs of the POTW?
- Has the Region made progress in delegating the O&M program to the States? How are the State O&M programs evaluated?
- Discuss any problems with O&M delegation to the State.
- Are compliance inspections of grant-funded POTWs followed up with appropriate action?
- Are Regional information systems linked to national systems?
- Are State information systems linked to national systems?

Improve Quality  
of Data

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

A2k. COMPLIANCE  
(Continued)

Initiate Enforcement Actions  
as Required to Obtain  
Compliance with NPDES  
Permits

# of administrative enforce-  
ment actions (AOs and NOV's)  
issued by Region (1)  
--municipal (major/minor)  
--non-municipal (major/minor)

# of referrals generated  
by Region (1)

# of administrative enforce-  
ment actions resolved (by  
Region) (1)

- What procedures are used by  
Regions/States to coordinate inter-  
program activities and to set  
priorities for initiating enforce-  
ment actions?

- Is there a link between water  
quality problem areas and Region/  
State formal enforcement actions?

- To what extent are enforcement  
actions linked to data generated  
from the discharge monitoring  
report (DMR) and DMR quality assur-  
ance program?

- To what extent are Regions using  
Enforcement Management System  
(EMS)?

Initiate Administrative  
Enforcement Actions as  
Required to Obtain Compli-  
ance with non-NPDES  
Requirements of CWA

# of §311(6)(A) oil and  
hazardous substances spills  
referred to USCG (2)

# of AOs issued for unautho-  
rized discharge of dredge  
and or fill material (2)

- Is there a trend of increased num-  
bers of hazardous substances spills  
being reported and investigated?

- Is the average quantity of spilled  
material increasing, decreasing, or  
staying the same?

A-18

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\*(1) Water Enforcement Action \*  
\* Report \*  
\*(2) Status Update Report \*  
\* \*  
\* \*  
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

B2a. PUBLIC  
WATER  
SUPPLY

Program Management

# of States which have  
assumed primacy

- What plans have been developed for additional States assuming primacy?
- Are there any States that intend to withdraw from primacy?
- What plans have been developed, if any, for direct implementation of PWS programs withdrawn from primacy States?
- What State requests for assistance are not accomplished due to resource cuts? How are these decisions made?
- What activities are not getting done due to grant reductions?
- What are State perceptions of the Regional program?
- What management systems are used to track State grant expenditures? What do Regions do with information?

Implementation of  
Trihalomethanes (THM)  
Regulations

% of States with approved  
program amendments

# of States with certified  
laboratories for THM

# and % of systems subject  
to regulation (1) \*\*

# and % of systems in vio-  
lation of MCL

# of systems with variances  
or exemptions

- What problems have States encountered in implementing THM Regulations? How has Region responded to problems? Solutions?
- What forms of assistance has the Region provided to States analysis, lab capability, and techniques? Is it effective?
- If a variance or exemption was issued by a primacy agency, was it coordinated with the Region? What was the Region's role?

A-19

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\*QUANTITATIVE MEASURES DATA SOURCES\*

\*-----\*

\*(1) FRDS \*

\* Supplied by Region \*

\* \*\*System being modified to \*

\* incorporate \*

\* \*

\*\*\*\*\*

NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

B2a. PUBLIC  
WATER  
SUPPLY  
(Continued)

Compliance with NIPDW  
Regulations

Trends in compliance (1979-  
1982) for the Region and  
State

# and % of persistent  
violations by community  
systems (1) \*\*

# and % of systems with  
serious or persistent  
violations that have  
enforceable compliance  
schedules

# of variances and exemptions  
(V/E) issued and/or reviewed

- What provisions have States (State by State) included in work plans to reduce persistent maximum containment level (MCL) and monitoring violations?
- Do the reports submitted to EPA accurately reflect the drinking water quality? What action has EPA taken to verify the accuracy of the data? (by State)
- How do States determine priorities for follow-up?
- Has the Region identified special compliance problem areas? What steps were taken to remedy problems in primacy and non-primacy States?
- What feedback has the Region given to State regarding compliance?
- Has a V/E review been conducted? What are its findings?

A-20

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\*(1) FRDS \*  
\* Supplied by Region \*  
\* \*\*System being modified to \*  
\* incorporate \*  
\* \*  
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

B2b. UNDERGROUND  
INJECTION  
CONTROL

UIC Delegation

# of State Program Approvals

% of compliance with  
schedules

# and % of permits issued  
by delegated States by  
class of well for exist-  
ing wells

# and % of existing Class  
II wells for which mechani-  
cal integrity tests that  
have been performed

- Are Regional Office's State by State delegation strategies being implemented?
- If slippage is encountered, why?
- What can be done to expand delegation?
- What types of problems are delegated States encountering?
- What types of assistance are being requested?
- What problems are there in grant awards and oversight?

Direct Implementation

# and % of programs  
promulgated

- How is the Region progressing against its implementation plan for non-primacy State and Indian lands? What types of problems are being encountered? What are the plans to address these problems?
- How are resources used to meet priority objectives?

A-21

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\* Supplied by Region \*  
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

B2b. UNDERGROUND  
INJECTION  
CONTROL  
(Continued)

A-22

Issue Permits/Assure  
Compliance

# and % of permits issued  
within allowed time (2)

# and % of major viola-  
tions resolved or on  
compliance schedules (2)

# and % of major UIC  
permit violations (2)

# of inspections

# of formal enforcement  
actions (1)

- To what extent is UIC integrated into Regional management systems?
- Is there a balanced UIC program in place? What are the major priority areas/activities within the State programs? Why?
- To what extent is there coordination with other RO Divisions?
- Are States or EPA conducting mid-course evaluations? What problems have they encountered?
- Have UIC permits been issued in a timely manner? Is there a backlog? If so, how does the Region plan to eliminate the backlog?
- Have there been any enforcement problems? How were they handled?
- Is program (inventory, reports, compliance) up to date? Explain.
- What is Regional strategy for use of formal and informal enforcement actions?

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\*(1) FURS \*  
\*(2) Supplied by Region \*  
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

C2a. MARINE  
PROTECTION  
STRATEGY

Implement Ocean Dumping/  
Ocean Discharge Program

# of permit applications  
processed and permits  
issued  
--ocean dumping  
--ocean discharge (# of  
general permits)

- What problems has the Region encountered in reviewing applications and issuing permits? How has the Region attempted to resolve them?
- Has there been a significant increase in permit applications for ocean dumping?
- What efforts are undertaken by the Region to determine whether ocean discharge permit conditions are being met?

A-23

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*QUANTITATIVE MEASURES DATA SOURCES*
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* Permits Compliance System      *
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

C2b. SECTION 301(h) 301(h) Marine Waivers  
WAIVERS

# of tentative decisions and  
draft permits issued

# of 301(h) final permits  
issued

- What progress is being made by both Region and State adhering to approved agreements? Discuss problems/successes.
- What priority procedures does the Region/State use in establishing 301(h) review schedules? How do the priority procedures result in direction of resources to highest water quality problems?

A-24

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\* Supplied by Region \*  
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NATIONAL  
DIRECTIONS

ACTIVITIES

QUANTITATIVE MEASURES

QUALITATIVE MEASURES

D2a. GROUND WATER  
PROTECTION  
POLICY AND  
COORDINATION

Response to Ground Water

# of ground water  
contamination incidents  
tracked by Regions during  
FY 1983

- What procedures has the Region established to coordinate ground water protection programs?
- Is there effective Region/State coordination with regard to ground water related issues impacting drinking water supplies?
- Is there adequate Region/State support to respond to ground water problems? Explain procedures, technical expertise, and timeliness of response.
- What procedures have Regions/States developed to deal with on-going ground water contamination problems impacting drinking water sources once they have been identified?

A-25

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\*QUANTITATIVE MEASURES DATA SOURCES\*  
\*-----\*  
\* Supplied by Region \*  
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## APPENDIX B

### DEFINITION OF TERMS

Administrator's Management Accountability System focuses on corrective actions, tracks progress against goals, identifies problems/successes, spotlights key programs for selected performance in depth, (i.e., delegation of construction grants program), improves program performance, and stresses results not process.

Administrator's Policy Guidance for FY 1983 sets forth the Agency's policy directions. It is intended to provide the directions, themes, and approaches for EPA staff to use to conduct the Agency's activities.

Office of Water Operating Year Guidance and Accountability System for FY 1983 supplements the Administrator's Policy Guidance in setting forth key Office of Water activities in FY 1983 and ties in with the overall Administrator's Management Accountability System which focuses on key items and environmental outcomes. The Guidance provides directions and themes for conducting and managing programs under the Clean Water Act, the Safe Drinking Water Act, and the Ocean Dumping and Discharge Regulation and Ground Water Protection Policy. The Accountability System will assist EPA managers in evaluating the impact of national program policy directions on State water programs and will demonstrate environmental results.

National program directions are the major areas of policy emphasis for implementation in FY 1983.

Activity areas are Regional and State initiatives to implement the national program directions.

Reporting requirements provide the key data and information base for evaluating performance. There are two types of reporting requirements: quantitative and qualitative measures.

- Quantitative measures focus on information needed for program management and do not include workload/budget related information. The budget and workload model information will be collected separately through the budget process.
- Qualitative measures are limited to those questions which can realistically be asked during the Program Review. The measures are management related.

**APPENDIX C**  
**LIST OF ABBREVIATIONS**

ANPRM	Advanced Notice of Proposed Rulemaking
AT	Advanced Treatment
BAT	Best Available Technology Economically Achievable
BCT	Best Conventional Technology
BIA	Bureau of Indian Affairs
BPT	Best Practicable Technology
COE	Corps of Engineers
CPP	Continuing Planning Process
EMS	Enforcement Management System
EPA	Environmental Protection Agency
FRDS	Federal Reporting Data System
GICS	Grants Information Control System
MCIS	Municipal Compliance Improvement Strategy
MCL	Maximum Contaminant Level
MMS	Municipal Management Strategy
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NSPS	New Source Performance Standards
O&M	Operations and Maintenance
ORD	Office of Research and Development
OTEC	Ocean Thermal Energy Conversion
PCS	Permits Compliance System
POTWs	Publicly Owned Treatment Works
RIA	Regulatory Impact Analysis
THM	Trihalomethanes
TMDLs	Total Maximum Daily Loads
UIC	Underground Injection Control
USGS	United States Geological Survey
VOCs	Volatile Organic Chemicals
WLAs	Wasteload Allocations
WQM	Water Quality Management