



**SUPPLEMENT  
NO. 2  
NOVEMBER 1976**

# **Municipal Wastewater Treatment Works Construction Grants Program**

## **References**

**Regulations**

**·Guidance**

**·Procedures**



**MCD 02 .2**

United States Environmental Protection Agency  
Washington, D.C. 20460



**TO HOLDERS OF THE UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY MANUAL OF REFERENCES (MCD-02):**

**PLEASE FILE THE ATTACHED CONSTRUCTION GRANTS  
PROGRAM REQUIREMENTS MEMORANDA 76-3, 76-4, 76-5 IN  
SECTION II OF THE MANUAL.**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 16 1976

Construction Grants  
Program Requirements Memorandum No.  
PRM # 76-3

SUBJECT: Presentation of Local Government Costs of Wastewater  
Treatment Works in Facility Plans

FROM: John T. Rhett, Deputy Assistant Administrator  
for Water Program Operations (WH-546)

A handwritten signature in black ink that reads "John T. Rhett".

TO: Regional Administrators

ATTN: Water Division Directors

I. PURPOSE

This memorandum provides Agency policy concerning the presentation of local Costs of wastewater treatment works in Facility Plans and public disclosure of this information.

II. DISCUSSION

Section 35.917-1(h) of the Construction Grant Regulations requires that a facility plan include a "brief statement demonstrating that the authorities which will be implementing the plan have the necessary legal, financial, institutional, and management resources available to insure the construction, operation and maintenance of the proposed treatment works." Further, Section 35.925-5 requires that the Regional Administrator shall, before awarding grant assistance, determine "that the applicant has:

- (a) agreed to pay the non-Federal project costs and
- (b) has the legal, managerial and financial capability to insure adequate construction operation, and maintenance of the treatment works throughout the applicants jurisdiction."

The financial assurances would have little basis unless those served by the treatment works are informed of their costs. The quality review of facility plans during the past year has shown that many lack financial information on non-Federal debt service or operation and maintenance costs and that, even where such data are presented, these costs are not usually translated into charges for a typical residential customer. Some EPA regions have indicated that most residents to be served by grant funded treatment works will be unaware of their financial obligations until construction of the works is 80% complete and user charges have been determined.

This problem would be eliminated and the goals of public participation served better by including an estimate of project costs to users and taxpayers in the facility plan. Such a public estimate would also create a climate favoring careful consideration of the least cost alternatives, including greatest possible use of existing public and private facilities.

### III. POLICY

#### A. Financial Information

The facility plan shall present the cost information listed below. These may be only rough estimates, and may be presented as a range of possible costs when major unknowns exist such as whether or not substantial parts of the project are grant eligible.

1. Estimated total capital costs for the recommended treatment works, a breakdown of estimated eligible and ineligible costs, and the estimated Federal, State, local governmental and industrial shares of the capital costs.

2. The expected method of local financing and estimated annual debt service charges or taxes (based on the expected interest rate for municipal borrowing) on the total local capital cost of the recommended treatment works.

3. Estimated annual operation and maintenance costs and the estimated industrial and local government's shares thereof for the recommended treatment works.

4. The estimated monthly charge for operation and maintenance, the estimated monthly debt service charge, the estimated connection charge, and the total monthly charge to a typical residential customer.

to navigable waters, defined in Section 502(7) of P.L. 92-500 as "waters of the United States, including the territorial seas". The United States District Court for the District of Columbia in NRDC v. Callaway, et al., 392 F. Supp. 687, 7 ERC 1784 (D.D.C. March 27, 1975) has recently interpreted the statutory definition of navigable waters to extend 404 regulatory jurisdiction beyond the limits of traditional navigability. Traditional navigability serves as the jurisdictional boundary for the Corps Section 10 regulatory program under the Rivers and Harbors Act of 1899. The discharge of dredged or fill material into "waters of the United States" requires a Section 404 permit. A discharge into traditional navigable waters will require a Section 10 permit as well as a 404 permit. In cases where both types of permits are required, the Corps will generally consolidate the requirements of both into a single document. The issuance of a Section 10 permit is in most cases based on identical criteria to the issuance of a 404 permit.

The Corps has published interim final regulations governing the issuance of 404 and Section 10 permits in 33 CFR Part 209.120, Permits for Activities in Navigable Waters or Ocean Waters, Federal Register, Vol. 40, No. 144, July 25, 1975. EPA has published its discharge guidelines for 404 permits in 40 CFR Part 230, Discharge of Dredged or Fill Material, Federal Register, Vol. 40, No. 173, September 5, 1975, (interim final).

Generally, a 404 permit will be required for an activity involving the discharge of dredged or fill material into most rivers, lakes and streams, their tributaries and contiguous or adjacent wetlands, and into coastal waters and their contiguous or adjacent wetlands. A Section 10 permit will generally be required for discharges into wetlands below mean high tide on coastal areas or into rivers, lakes and streams presently or historically used or susceptible to use for navigation. A detailed definition of all water areas affected by the 404 and Section 10 requirements is found in 209.120(d) of the Corps regulation, 33 CFR Part 209. Wetlands are defined generally as those areas that are periodically inundated and that are characterized by the presence of aquatic vegetation.

Section 404/Section 10 permits will be required for the placement of fill material involved with the construction of treatment plants, interceptors and other sewers, and outfall pipes if such facilities are located in or cross over any of the water bodies or wetlands areas listed above. A Section 10 permit will also be required for the placement of structures in traditional navigable waters, such as outfall pipes, even if no discharge of dredged or fill material is required for such structures. The Corps regulations, however, provide for a phased implementation of the 404 program over a two year period, and discharges of fill material into certain water areas may not require a 404 permit if conducted prior to certain dates. Section 209.120(e) of the Corps regulation describes the phased approach. District offices of the Corps should be contacted as to this.

Section 209.120(i)(2)(ix) of the Corps regulations provides for the issuance of general 404/Section 10 permits for "certain clearly defined categories of structures or work, including discharges of dredged or fill material....." General permits may be issued on a state-wide or other areawide basis, and once issued, individual activities within those categories and areas will not require the issuance of additional permits provided that they are substantially similar in nature and cause only minimal adverse individual or cumulative effects on the environment. The construction of interceptor sewers and outfall pipes may be categories of activities for which general permits could be issued in certain areas.

The Corps of Engineers applies a number of criteria to determine whether a 404/Section 10 permit should be issued. The general test which the Corps uses in making its decision is based on a determination of the probable impact of the proposed structure or work and its intended use on the public interest. Applications for permits for sewage treatment facilities will be judged by the same standard. In most cases, a facility's beneficial environmental impacts on water quality should support the issuance of a permit. In some cases, however, significant adverse environmental impacts of a project may merit the denial of a permit and consideration of an alternative site proposal.

EPA is required to conduct an evaluation of the environmental impacts of its construction grants projects under the National Environmental Policy Act. The Corps must also comply with NEPA in issuing Section 10 and Section 404 permits. The Corps, however, will defer to EPA as lead agency to conduct the NEPA evaluation, and where necessary, EPA will prepare an Environmental Impact Statement for construction grants projects which also require a 404/Section 10 permit. The EPA evaluation, therefore, must address the environmental considerations affecting the 404/Section 10 permit. The Corps will review the EPA evaluation and advise EPA of additional information for inclusion in the evaluation necessary to make a 404/Section 10 determination.

#### IMPLEMENTING PROCEDURE

Regional offices should apply the following procedures to assure early compliance with 404/Section 10 permit requirements for construction grants projects:

##### I. Projects in Facility Planning Stage

###### 1. Consultation with Corps

All Step 1 grantees should be instructed to consult with the Corps immediately upon identifying a project alternative which might require siting any portion of that project in a wetlands area or other navigable waters.

B. Public Disclosure

The above information for the proposed plan shall be presented during the public hearing on the facility plan.

IV. IMPLEMENTATION

This policy shall apply to all facility plans for which public hearings are held on or after January 2, 1977.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 14 1976

PROGRAM REQUIREMENTS MEMORANDUM  
PRM #76 -4

SUBJECT: Coordination of Construction Grants Program with  
EPA-Corps of Engineers Section 404/Section 10 Permit  
Programs

FROM: John T. Rhett, Deputy Assistant Administrator  
for Water Program Operations (WH-546)

*John T. Rhett*

TO: Regional Administrators, I - X

ATTN: Water Division Directors

PURPOSE

A Section 404 or a Section 404/Section 10 permit for the discharge of dredged or fill material may be required for the construction of EPA assisted wastewater treatment facilities if they are to be built in wetlands or other water areas. This memorandum sets out EPA policy as to the coordination of the construction grants and Section 404/Section 10 permit programs. The Corps of Engineers has concurred with this policy statement.

DISCUSSION

The Corps of Engineers issues permits under Section 404 of P.L. 92-500 and Section 10 of the Rivers and Harbors Act which regulate the discharge of dredged and fill material into navigable waters. Under the 404 program, the Corps is responsible for issuing permits which must conform with discharge criteria established in guidelines published by EPA. Additionally, EPA has authority under Section 404(c) to prohibit the issuance of a 404 permit by the Corps if it determines the proposed discharge will have an unacceptable adverse effect on certain environmental areas. Under the Section 10 program, the Corps has sole responsibility for management of the program, and EPA does not have veto authority over the issuance of a permit.

The primary difference between the Section 404 and Section 10 programs is the extent of their jurisdiction over the various types of water bodies including wetlands. Jurisdiction under Section 404 extends



Consultation should take place at the earliest possible stage of the facility planning process. The grantee should discuss with the Corps whether a 404/Section 10 permit will be required and, if so:

- a. Whether the Corps would be likely to issue a permit for dredged material or fill discharge in that area, or whether the Corps or other Federal and State agencies would favor an alternative location.
- b. What environmental factors should be examined in the facility plan/environmental assessment which would provide the Corps with information necessary to make a final decision on the permit application after it is submitted.

## 2. 404/Section 10 Application

The Step 1 grantee should be instructed to submit a formal application for a 404/Section 10 permit at the point in the facility planning process that a final project alternative is selected involving a wetlands or other navigable waters location. The grantee should later notify the Corps when the project facility plan has been approved by EPA.

## 3. Compliance with NEPA

During the facility plan approval process, EPA should coordinate its decision on whether to issue a notice of intent and prepare an EIS or to issue a negative declaration with the Corps. EPA has lead agency responsibility for NEPA compliance for grants projects that also require a 404/Section 10 permit. However, care should be taken to consult the Corps as to all environmental issues surrounding a grants project in order to avoid duplicative environmental reviews and to facilitate Corps decision making on the 404/Section 10 permit. The Corps may undertake further NEPA review, however, if it needs additional environmental information to make an informed decision on the 404/Section 10 permit application.

## 4. EIS Preparation

When an EIS is to be prepared on grants projects also requiring a 404/Section 10 permit, EPA will be responsible for its preparation as the lead agency but should seek input from the Corps at all stages of preparation and review of the EIS.

## 5. 404/Section 10 Permit Requirement for Step 2 Grant

When required, an issued 404/Section 10 permit or a determination by the Regional Administrator that the Corps is prepared to issue a 404/Section 10 permit, shall be a prerequisite to the award of a Step 2 grant.

#### 6. EPA 404(b) and (c) review

EPA review of 404 permit applications under 404(b) and (c) should be coordinated with the grants program at the regional level to avoid possible delays. Regional Administrators are required to review all 404 permits issued for grants projects as well as non-EPA projects to assure that the projects comply with the EPA 404 guidelines. Consequently, grant personnel should coordinate early with 404 program review personnel to insure full consideration in the grants program of the criteria used in the EPA 404 review and awareness in the 404 program of the timing of the grants process.

#### II. Projects in Step 2 and 3 Stages

For construction grants projects which have already proceeded past the planning stage, EPA should insist that all grantees immediately consult with the Corps to determine whether 404/Section 10 permits are required for their projects. When a 404/Section 10 permit is required, EPA should work with the Corps and the grantee to expedite the permit issuance process.

#### III. General Permits

Regional offices should work with their States and the appropriate Corps offices to investigate the possibilities of acquiring general permits from the Corps for certain categories of interceptors and outfalls which may have minimal environmental impacts for all grantees within a State or within a certain area of a State. General permits for such activities may be properly considered for issuance by the District Engineers under both Section 404 and Section 10. Regional construction grants personnel should coordinate their efforts in this area with the regional EPA 404 offices. Section 209.120(i)(2)(ix) of the Corps regulations sets forth requirements for the issuance of general permits.

Observance of these procedures should help to assure that the Section 404/Section 10 permit requirements do not act as a source of delays for the grants program. It is particularly essential that the Corps of Engineers be consulted early as to any potential 404/Section 10 problems. Early consultations should help to maintain good working relations between the two agencies and to expedite both the grants and the 404/Section 10 permit programs.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 16 1976

PROGRAM REQUIREMENTS MEMORANDUM  
PRM #76-5

SUBJECT: Flood Insurance Requirements

FROM: Deputy Assistant Administrator  
for Water Program Operations

TO: Regional Administrators  
ATTN: Water Division Directors

*John T Rhett*

PURPOSE:

This Program Requirements Memorandum summarizes National Flood Insurance Program requirements applicable to the construction grants program. It supersedes Program Guidance Memoranda 25, 25A and 54.

DISCUSSION:

The National Flood Insurance Act of 1968 (42 U.S.C. 4001-4127) as expanded and amended by the Flood Disaster Protection Act of 1973 (P.L. 93-234) provides for low cost flood insurance for projects in flood-prone areas through the means of a subsidy. A prerequisite for this assistance is the enactment by local jurisdictions of certain minimum flood plain management measures to reduce or avoid future flood damage within their flood-prone areas. When adequate flood plain management measures have been adopted and approved by the Department of Housing and Urban Development, HUD announces the community's eligibility for the sale of flood insurance and the community is then participating in the program.

The HUD Mandatory Purchase of Flood Insurance Guidelines were printed in the Federal Register on July 17, 1974 (39 FR 26186-93), and were supplemented on April 14, 1975, (40 FR 16710).

POLICY:

The Act requires local jurisdictions encompassing designated special flood hazard areas to participate in the program and purchase flood insurance as a condition of receiving any form of Federal or Federally-related assistance for construction purposes or for the acquisition of any real or non-expendable personal property in an identified special flood hazard area if the total cost of such activities is \$10,000

per structure or more. Each community has until one year after notification of identification as a flood-prone community to enter the flood insurance program (i.e., become a "participating" or "eligible" community) or become ineligible for any Federal financial assistance for acquisition or construction in the flood hazard area.

A community which has not entered the flood insurance program within one year after notification of flood-prone status will be ineligible to receive a Step 3 grant until it does enter the program if the insurable portion of the proposed project is in a designated flood hazard area.

Communities which have not yet been surveyed for flood-prone status, or which have been surveyed but were notified of flood-prone status less than a year before, do not have to be participating in the flood insurance program to obtain a Step 3 grant. Upon completion of the year after the notification, however, each community in this latter category must participate in the flood insurance program prior to obtaining any further grants for construction in flood hazard areas.

Grants may be awarded to non-participating communities where the project is outside a designated area.

Where the prospective grantee is a "participating" community but the grant would include the construction of an insurable facility in a designated area of a non-participating neighboring jurisdiction (and more than a year has elapsed since identification of the flood hazard area) the failure of the neighboring jurisdiction to participate in flood insurance prevents the award of the grant.

#### IMPLEMENTING PROCEDURE:

##### A. Insurance Requirements

Environmental Protection Agency grant regulations and procedures, 40 CFR 30.405-10, (40 FR 20232, May 8, 1975), require that the grantee or the construction contractor (whichever party or parties has insurable interest) must acquire any flood insurance made available to it under the National Flood Insurance Act of 1968, as amended, if the value of insurable improvements is \$10,000 per structure or more. Such insurance must be purchased beginning with the period of construction and maintained for the entire useful life of the project. HUD has interpreted the statute as providing insurance only for grant projects involving a new or reconstructed surface structure which is walled and roofed.

The amount of insurance required is the total project cost, excluding facilities which are uninsurable under the National Flood Insurance Program such as bridges, dams, water and sewer lines (above or below

ground) and underground structures and excluding the cost of the land, or the maximum limit of coverage made available to the grantee under the National Flood Insurance Act, whichever is less. The present maximum limit for non-residential structures is \$200,000 on the structure and \$200,000 on contents.

The grantee must certify, along with the first payment request involving reimbursement for insurable construction, that he has purchased the required flood insurance. The evidence of such insurance must be available at all times for submission to the Project Officer on request or for review in the grantee's offices.

Flood insurance is required for buildings during the course of construction as well as for building materials or equipment stored in a fully-enclosed structure adjacent to the building site, if the materials or equipment are scheduled to be incorporated into structures which are eligible for insurance. The amount of flood insurance required at any given time need not exceed the amount of the grantee's total disbursement for insurable construction to date. While underground structures are not insurable, foundations and footings of a structure which is primarily above-ground are insurable and are subject to the insurance purchase requirement since they are the initial stages of construction of the above-ground portions of the structure.

If a Step 3 grant is made to a grantee which has previously been assisted with respect to the same facility, the grantee must purchase flood insurance on the previously assisted facility as well as on the new construction. The amount of flood insurance required should be based upon its current value, however, and not on the amount of assistance previously provided.

Flood proofing does not eliminate nor reduce the requirement for program participation or insurance but could affect the rate charged for insurance.

The required insurance premium for the period of construction is an allowable project cost.

B. List of Communities Ineligible for Step 3 Grants

A cumulative list of ineligible communities (i.e. those which were designated as flood-prone a year or more before but have not met the above requirement and are therefore prohibited from receiving a Step 3 grant for projects in designated flood hazard areas) is published during the first week in each month by HUD in the Federal Register under the title "National Flood Insurance Program, Flood-prone Areas of Communities



Subject to July 1, 1975, Prohibition of Federal and Federally-Related Assistance." This list will also contain the names of the communities that face a qualification deadline sometime during that month. In addition, an updated listing will be published on a weekly basis removing the names of those communities that have subsequently qualified.

In addition, each Regional Office receives HUD's book-size monthly list of communities participating, suspended, withdrawn and not participating (with flood hazard area identified) in the program. The Regional Office may request HUD/FIA Washington to place additional names on the mailing list for this publication if more copies are needed.

#### C. Regional Office Responsibilities

The Regional Office shall discuss flood insurance requirements with all grant applicants at the pre-application conference. It should be stressed that non-participating communities which have been designated flood-prone for a year or more under the Flood Disaster Protection Act will not be able to receive Step 3 grant assistance for a project in the designated flood-prone area until they have entered the flood insurance program, and that to qualify they must develop flood plain management strategies in compliance with HUD guidelines as set forth in Title 24 of the Code of Federal Regulations, Chapter 10, Subchapter B, commencing at Part 1909. They will, however, be able to receive grant funds for Steps 1 and 2 without such participation.

Each region has the responsibility to make each community with a Step 1 or Step 2 grant aware of the National Flood Insurance Program and its requirements relative to Step 3 grant assistance.

Before awarding any Step 3 grant, the region shall check the most current list of ineligible communities and communities about to become ineligible to determine if the applicant or grant project is among them.

#### D. Environmental Impact of Projects on Flood Plains

The environmental impact of projects on flood plains should be analyzed in accordance with other facility planning guidance.

#### E. Sources of Maps and Other Program Information

Flood hazard areas are shown on Flood Hazard Boundary Maps or Flood Insurance Rate Maps issued by HUD at intervals. These maps are maintained on file within each eligible community in a repository designated by the chief executive officer. Maps, literature and policy application forms and manuals are available from any National Flood Insurers Association

servicing company. HUD Regional Flood Insurance Specialists are located in each HUD Regional Office and should be utilized by EPA personnel to answer questions relating directly to the operation of the flood insurance program. Addresses of HUD Regional Flood Insurance Specialists and State Coordination Agencies for Flood Insurance are attached as a portion of the EPA Grants Information Guide, National Flood Insurance Program. If these sources cannot assist, contact the Federal Insurance Administration, HUD, Washington, D.C. 20410, 202-755-5581 or toll free 800-424-8872 or 8873.

F. Assistance From Headquarters

Any questions on the application of the policy to specific projects should be referred to the Facility Requirements Branch, (202-426-9404), Office of Water Program Operations or to the Grants Policy and Procedures Branch (202-755-0860), Grants Administration Division, OPM.

Attachment

REFERENCES:

The National Flood Insurance Act of 1968 (42 U.S.C. 4001-4127)  
 The Flood Disaster Protection Act of 1973 (PL 93-234)  
 HUD Mandatory Purchase of Flood Insurance Guidelines, 1974, (39 FR 26186-93), (40 FR-16710)  
 EPA Grant Regulations and Procedures (40 FR 20232, May 8, 1975) (40 CFR 30.405-10)  
 National Flood Insurance Program, Flood Prone Areas of Communities  
 Federal Register-Monthly  
 Title 24, CFR, Chapter 10, Subchapter B, 1909-



**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**WASHINGTON, D.C. 20460**

**GRANTS ADMINISTRATION DIVISION**

**GRANTS INFORMATION GUIDE**

**NATIONAL FLOOD INSURANCE PROGRAM**

**General**

The National Flood Insurance Program is a Federally-subsidized program authorized by the National Flood Insurance Act of 1968 (42 U.S.C. 4001-4127) to protect property owners who previously had been unable to get coverage through the private insurance industry. It is administered by the Federal Insurance Administration, Department of Housing and Urban Development. The program, for the first time, made flood insurance available to individuals at affordable rates. In return for the Federal subsidy, State and local governments are required to adopt certain minimum floodplain management measures to reduce or avoid future flood damage within their floodprone areas.

The Flood Disaster Protection Act of 1973 (P.L. 93-234, December 31, 1973) greatly expanded the available limits of flood insurance coverage and imposed additional requirements on property owners and communities.

The Act required the purchase of flood insurance on and after March 2, 1974, as a condition of receiving any form of Federal or Federally-related assistance for construction purposes or for the acquisition of any real or nonexpendable personal property in an identified special flood hazard area that is located within any community currently participating in the National Flood Insurance Program. A "participating community," also known as an "eligible community," is a community in which the Federal Insurance Administration has authorized the sale of flood insurance under the National Flood Insurance Program.

For any community that was not participating in the program at the time the assistance was approved, the statutory requirement for the purchase of flood insurance did not apply. However, beginning July 1, 1975, or one year after notification of identification as a flood-prone community, whichever is later, the requirement applies to all identified special flood hazard areas within the United States, which have been delineated on Flood Hazard Boundary Maps or Flood Insurance Rate Maps issued by the Department of Housing and Urban Development. Thereafter, no EPA financial assistance can legally be approved for real or nonexpendable personal property or for construction purposes in these areas unless the community has entered the program and flood insurance is purchased.

**Regulations**

HUD regulations governing the National Flood Insurance Program are set forth in Title 24 of the Code of Federal Regulations, Chapter 10, Subchapter B, commencing at Part 1909.

Supersedes information sheet  
dated August 8, 1974

Issue Date: July 1, 1975  
Grants Information Branch (PM816)

The final EPA general grant regulations published on the Federal Register on May 8, 1974, include the requirements for the purchase of flood insurance as a condition of EPA assistance (40 CFR 30.405-10.)

#### EPA Grantee Requirements

##### 1. Wastewater treatment construction grants.

The grantee or the construction contractor, as appropriate, must acquire flood insurance made available to it under the National Flood Insurance Act of 1968, as amended, beginning with the period of construction and maintain such insurance for the entire useful life of the project if the total value of insurable improvements is \$10,000 or more. The amount of insurance required is the total project cost, excluding facilities which are uninsurable under the National Flood Insurance Program and excluding the cost of the land, or the maximum limit of coverage made available to the grantee under the National Flood Insurance Act, whichever is less. The required insurance premium for the period of construction is an allowable project cost.

##### 2. Other grant programs.

The grantee must acquire and maintain any flood insurance made available to it under the National Flood Insurance Act of 1968, as amended, if the approved project includes (a) any incidental construction-type activity, or (b) any acquisition of real or nonexpendable personal property, and the total cost of such activities and acquisitions is \$10,000 or more. The amount of insurance required is the total cost of any insurable, nonexpendable personal or real property acquired, improved, or constructed, excluding the cost of land, as a direct cost under the grant, or the maximum limit of coverage made available to the grantee under the National Flood Insurance Act, as amended, whichever is less, for the entire useful life of the property. The required insurance premium for the period of project support is an allowable project cost.

If EPA provides financial assistance for nonexpendable personal property to a grantee that the Agency has previously assisted with respect to real estate at the same facility in the same location, EPA must require flood insurance on the previously-assisted building as well as on the personal property. The amount of flood insurance required on the building should be based upon its current value, however, and not on the amount of assistance previously provided.

#### Sources of insurance policies, maps, and program information

1. Insurance policies under the National Flood Insurance Program can be obtained from any licensed property insurance agent or broker serving the eligible community, or from the National Flood Insurers Association (NFIA) servicing company for the State. A current listing of servicing companies is enclosed.

2. Flood Hazard Boundary Maps are the first maps prepared in the identification process. These indicate the locations of identified special flood hazard areas and are always maintained on file within each eligible (participating) community in a repository designated by the mayor or chief executive officer, usually the building inspector's office or the city clerk's office. The address of such repository is published at 24 CFR 1914 and is amended regularly in the Federal Register. The Flood Insurance Rate Maps are issued later following a detailed study of the flood hazard area. These maps delineate degrees of flood hazard and include more precise area identification.

3. Maps, literature, and policy application forms and manuals are available for distribution from any NFIA servicing company. The servicing companies are also equipped to answer questions on eligibility of communities, scope of coverage, and maximum amounts of insurance available with respect to particular types of buildings.

4. Questions that cannot be answered by individual agents or brokers or by the appropriate servicing company may be referred to the National Flood Insurers Association, 1755 Jefferson Davis Highway, Alexandria, Va., 22202, telephone 703-920-2070; to the flood insurance representative at the nearest HUD regional office (list enclosed); or to the Federal Insurance Administration, HUD, Washington, D.C. 20410, 202-755-5581, or toll free 800-424-8872 (8873).

5. Communities may obtain assistance from the appropriate State Coordinating Agency in adopting the required flood plain management regulations and qualifying for the program. A list of the State Coordinating Agencies is also attached.

6. Copies of statutes, program regulations, and community eligibility application forms may be obtained from HUD regional offices or directly from the Federal Insurance Administration in Washington, D. C.



Department of Housing And Urban Development  
REGIONAL FLOOD INSURANCE SPECIALISTS

REGION I

John F. Kennedy Federal Building  
Room 405A  
Boston, Massachusetts 02203  
Telephone: (617) 223-2616 or 2709  
(For Connecticut, Maine, Massachusetts,  
New Hampshire, Rhode Island, Vermont)

REGION II

26 Federal Plaza  
New York, New York 10007  
Telephone: (212) 264-4756 or 8021  
(For New Jersey, New York,  
Puerto Rico)

REGION III

Curtis Building  
Sixth and Walnut Streets  
Philadelphia, Pennsylvania 19106  
Telephone: (215) 597-9581  
(For Delaware, District of Columbia,  
Maryland, Pennsylvania, Virginia,  
West Virginia)

REGION IV

1371 Peachtree Street, N.E.  
Atlanta, Georgia 30309  
Telephone: (404) 526-2391  
(For Alabama, Florida, Georgia,  
Kentucky, Mississippi, North  
Carolina, South Carolina, Tennessee)

REGION V

300 South Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 353-0757  
(For Illinois, Indiana, Michigan,  
Minnesota, Ohio, Wisconsin)

REGION VI

New Federal Building  
1100 Commerce Street  
Dallas, Texas 75202  
Telephone: (214) 749-7412  
(For Arkansas, Louisiana, New  
Mexico, Oklahoma, Texas)

REGION VII

Federal Office Building  
911 Walnut Street  
Kansas City, Missouri 64106  
Telephone: (816) 374-2161  
(For Iowa, Kansas, Missouri,  
Nebraska)

REGION VIII

Federal Building  
1961 Stout Street  
Denver, Colorado 80202  
Telephone: (303) 837-2347  
(For Colorado, Montana, North  
Dakota, South Dakota, Utah,  
Wyoming)

REGION IX

450 Golden-Gate Avenue  
P. O. Box 36003  
San Francisco, California 94102  
Telephone: pending  
(For Arizona, California, Hawaii,  
Nevada)

REGION X

Room 3068 Arcade Plaza Building  
1321 Second Avenue  
Seattle, Washington 98101  
Telephone: (206) 442-1026  
(For Alaska, Idaho, Oregon,  
Washington)

Department of Housing And Urban Development  
STATE COORDINATING AGENCIES FOR FLOOD INSURANCE

ALABAMA

Alabama Development Office  
Office of State Planning  
State Office Building  
501 Dexter Avenue  
Montgomery, Alabama 36104

ALASKA

Department of Community and  
Regional Affairs  
Division of Community Planning  
Pouch B  
Juneau, Alaska 99811

ARIZONA

Arizona State Land Department  
1624 W. Adams, Room 400  
Phoenix, Arizona 85007

ARKANSAS

Division of Soil and Water  
Resources  
State Department of Commerce  
1920 West Capitol Avenue  
Little Rock, Arkansas 72201

CALIFORNIA

Department of Water Resources  
Post Office Box 388  
Sacramento, California 95802

COLORADO

Colorado Water Conservation Board  
Room 102  
1845 Sherman Street  
Denver, Colorado 80203

CONNECTICUT

Department of Environmental  
Protection  
Division of Water and Related  
Resources  
Room 207, State Office Building  
Hartford, Connecticut 06115

DELAWARE

Division of Soil and Water  
Conservation  
Department of Natural Resources  
and Environmental Control  
Tatnall Building, Capitol  
Dover, Delaware 19901

FLORIDA

Department of Community Affairs  
2571 Executive Center Circle East  
Howard Building  
Tallahassee, Florida 32301

GEORGIA

Department of Natural Resources  
Office of Planning and Research  
270 Washington Street, S. W. Rm. 707  
Atlanta, Georgia 30334

HAWAII

Division of Water and Land  
Development  
Department of Land and Natural  
Resources  
P. O. Box 373  
Honolulu, Hawaii 96809

IDAHO

Department of Water Administration  
State House - Annex 2  
Boise, Idaho 83707

ILLINOIS

Governor's Task Force on Flood  
Control  
300 North State St.  
P. O. Box 475, Rm. 1010  
Chicago, Illinois 60610

INDIANA

Division of Water  
Department of Natural Resources  
608 State Office Building  
Indianapolis, Indiana 46204

IOWA

Iowa Natural Resources Council  
James W. Grimes Building  
Des Moines, Iowa 50319

KANSAS

Division of Water Resources  
State Department of Agriculture  
State Office Building  
Topeka, Kansas 66612

KENTUCKY

Division of Water  
Kentucky Department of Natural  
Resources  
Capitol Plaza Office Tower  
Frankfort, Kentucky 40601

LOUISIANA

State Department of Public Works  
P. O. Box 44155  
Capitol Station  
Baton Rouge, Louisiana 70804

MAINE

Office of Civil Emergency  
Preparedness  
State House  
Augusta, Maine 04330

MARYLAND

Department of Natural Resources  
Water Resources Division  
State Office Building  
Annapolis, Maryland 21401

MASSACHUSETTS

Division of Water Resources  
Water Resources Commission  
State Office Building  
100 Cambridge Street  
Boston, Massachusetts 02202

MICHIGAN

Water Resources Commission  
Bureau of Water Management  
Stevens T. Mason Building  
Lansing, Michigan 48926

MINNESOTA

Division of Waters, Soils and  
Minerals  
Department of Natural Resources  
Centennial Office Building  
St. Paul, Minnesota 55101

MISSISSIPPI

Mississippi Research and Develop-  
ment Center  
P. O. Drawer 2470  
Jackson, Mississippi 39205

MISSOURI

Department of Natural Resources  
Division of Program and Policy  
Development  
State of Missouri  
308 East High Street  
Jefferson, Missouri 65101

MONTANA

Montana Dept. of Natural Resources  
and Conservation  
Water Resources Division  
32 South Ewing Street  
Helena, Montana 59601

NEBRASKA

Nebraska Natural Resources  
Commission  
Terminal Building, 7th Floor  
Lincoln, Nebraska 68508

NEVADA

Division of Water Resources  
Department of Conservation  
and Natural Resources  
Nye Building  
Carson City, Nevada 89701

NEW HAMPSHIRE

Office of Comprehensive Planning  
Division of Community Planning  
State House Annex  
Concord, New Hampshire 03301

NEW JERSEY

Bureau of Water Control  
Department of Environmental  
Protection  
P. O. Box 1390  
Trenton, New Jersey 08625

NEW MEXICO

State Engineer's Office  
Bataan Memorial Building  
Santa Fe, New Mexico 87501

NEW YORK

New York State Department of  
Environmental Conservation  
Division of Resources Management  
Services  
Bureau of Water Management  
Albany, New York 12201

NORTH CAROLINA

Division of Community Assistance  
Department of Natural &  
Economic Resources  
P. O. Box 27687  
Raleigh, North Carolina 27611

NORTH DAKOTA

State Water Commission  
State Office Building  
900 E. Boulevard  
Bismarck, North Dakota 58501

OHIO

Ohio Dept. of Natural Resources  
Flood Insurance Coord. Building  
Fountain Square  
Columbus, Ohio 43224

OKLAHOMA

Oklahoma Water Resources Board  
2241 Northwest Fortieth Street  
Oklahoma City, Oklahoma 73112

OREGON

Executive Department  
State of Oregon  
Salem, Oregon 97310

PENNSYLVANIA

Department of Community Affairs  
Commonwealth of Pennsylvania  
Harrisburg, Pennsylvania 17120

PUERTO RICO

Puerto Rico Planning Board  
1570 Ponce de Leon Avenue  
Stop 22  
Santurce, Puerto Rico 00908

RHODE ISLAND

R. I. Statewide Planning Program  
265 Melrose Street  
Providence, Rhode Island 02907

SOUTH CAROLINA

South Carolina Water Resources  
Commission  
P. O. Box 4515  
Columbia, South Carolina 29240

SOUTH DAKOTA

State Planning Bureau  
Office of Executive Management  
State Capitol  
Pierre, South Dakota 57501

TENNESSEE

Tennessee State Planning Office  
660 Capitol Hill Building  
Nashville, Tennessee 37219

TEXAS

Texas Water Development Board  
P. O. Box 13087  
Capitol Station  
Austin, Texas 78711

UTAH

Department of Natural Resources  
Division of Water Resources  
State Capitol Building, Rm. 435  
Salt Lake City, Utah 84114

VERMONT

Management & Engineering Division  
Water Resources Department  
State Office Building  
Montpellier, Vermont 05602

VIRGINIA

Bureau of Water Control  
Management  
State Water Control Board  
Post Office Box 11143  
Richmond, Virginia 23230

WASHINGTON

Department of Ecology  
Olympia, Washington 98501

WEST VIRGINIA

Office of Federal-State Relations  
Division of Planning & Development  
Capitol Building, Rm. 150  
Charleston, West Virginia 25305

WISCONSIN

Department of Natural Resources  
P. O. Box 450  
Madison, Wisconsin 53701

WYOMING

Wyoming Disaster and Civil  
Defense Agency  
P. O. Box 1709  
Cheyenne, Wyoming 82001

Department of Housing And Urban Development  
National Flood Insurance Program  
List of Servicing Company Offices  
March 1, 1975

ALABAMA

The Hartford Insurance Group  
Hartford Building  
100 Edgewood Avenue  
Atlanta, Georgia 30301  
Phone: (404) 521-2059

ALASKA

Industrial Indemnity Co. of Alaska  
P. O. Box 307  
Anchorage, Alaska 99510  
Phone: (907) 279-9441

ARIZONA

Aetna Technical Services Inc.  
Suite 901  
3003 North Central Avenue  
Phoenix, Arizona 85012  
Phone: (602) 264-2621

ARKANSAS

The Travelers Indemnity Company  
700 South University  
Little Rock, Arkansas 72203  
P. O. Box 51  
Phone: (501) 664-5085

CALIFORNIA-NORTHERN

Fireman's Fund American Insurance  
Companies  
P. O. Box 3136  
San Francisco, California 94119  
Phone: (415) 421-1676

CALIFORNIA-SOUTHERN

Fireman's Fund American Insurance  
Companies  
P. O. Box 2323  
Los Angeles, California 90051  
Phone: (213) 381-3141

COLORADO

CNA Insurance  
1660 Lincoln-Suite 1800  
Denver, Colorado 80203  
Phone: (303) 266-0561

CONNECTICUT

Aetna Insurance Company  
P. O. Box 1779  
Hartford, Connecticut 06101  
Phone: (203) 523-4861

DELAWARE

General Accident F & L Assurance  
Corp. Ltd.  
414 Walnut Street  
Philadelphia, Pennsylvania 19106  
Phone: (215) 238-5000

FLORIDA

The Travelers Indemnity Company  
1516 East Colonial Drive  
Orlando, Florida 32803  
Phone: (305) 896-2001

GEORGIA

The Hartford Insurance Group  
Hartford Building  
100 Edgewood Avenue  
Atlanta, Georgia 30301  
Phone: (404) 521-2059

HAWAII

First Insurance Co. of Hawaii, Ltd.  
P. O. Box 2866  
Honolulu, Hawaii 96803  
Phone: (808) 548-511

IDAHO

Aid Insurance Company  
Snake River Division  
1845 Federal Way  
Boise, Idaho 83701  
Phone: (208) 343-4931

ILLINOIS

State Farm Fire & Casualty Co.  
Illinois Regional Office  
2309 E. Oakland Avenue  
Bloomington, Illinois 61701  
Phone: (309) 557-7211

INDIANA

United Farm Bureau Mutual Insurance Co.  
130 East Washington Street  
Indianapolis, Indiana 46204  
Phone: (317) 263-7200

IOWA

Employers Mutual Casualty Company  
P. O. Box 884  
Des Moines, Iowa 50304  
Phone: (515) 280-2511



#### KANSAS

Royal-Globe Insurance Companies  
1125 Grand Avenue  
Kansas City, Missouri 64141  
Phone: (816) 842-6116

#### KENTUCKY

CNA Insurance  
580 Walnut Street  
Cincinnati, Ohio 45202  
Phone: (513) 621-7107

#### LOUISIANA

Aetna Technical Services, Inc.  
P. O. Box 61003  
New Orleans, Louisiana 70160  
Phone: (504) 821-1511

#### MAINE

Commercial Union Insurance Company  
c/o Campbell, Payson & Noyes  
27 Pearl St., Box 527 Pearl St. Station  
Portland, Maine 04116  
Phone: (207) 774-1431

#### MARYLAND

U.S. Fidelity & Guaranty Company  
P. O. Box 1138  
Baltimore, Maryland 21203  
Phone: (301) 539-0380

#### MASSACHUSETTS-EASTERN

Commercial Union Insurance Company  
1 Beacon Street  
Boston, Massachusetts 02108  
Phone: (617) 725-6128

#### MASSACHUSETTS-WESTERN

Aetna Insurance Company  
P.O. Box 1779  
Hartford, Connecticut 06101

#### MICHIGAN

Insurance Company of North America  
Room 300-Buhl Building  
Griswold & Congress Streets  
Detroit, Michigan 48226  
Phone: (313) 963-4114

#### MINNESOTA-EASTERN

The St. Paul Fire & Marine  
Company  
P. O. Box 3470  
St. Paul, Minnesota 55165  
Phone: (612) 222-7751

#### MINNESOTA-WESTERN

The St. Paul Fire & Marine 1  
Company  
7900 Xerxes Avenue South  
Minneapolis, Minnesota 55431  
Phone: (612) 835-2600

#### MISSISSIPPI

The Travelers Indemnity Company  
5360 Interstate 55 North  
P. O. Box 2361  
Jackson, Mississippi 39205  
Phone: (601) 956-5600

#### MISSOURI-EASTERN

MFA Insurance Companies  
1817 West Broadway  
Columbia, Missouri 65201  
Phone: (314) 445-8441

#### MISSOURI-WESTERN

Royal-Globe Insurance Companies  
1125 Grand Avenue  
Kansas City, Missouri 64141  
Phone: (816) 842-6116

#### MONTANA

The Home Insurance Company  
8 Third Street N.-P.O. Box 1031  
Great Falls, Montana 59401  
Phone: (406) 761-8110

#### NEBRASKA

Royal-Globe Insurance Companies  
1125 Grand Avenue  
Kansas City, Missouri 64141  
Phone: (816) 842-6116

#### NEVADA

The Hartford Insurance Group  
P. O. Box 500  
Reno, Nevada 89504  
Phone: (702) 329-1061

**NEW HAMPSHIRE**

Commercial Union Insurance Company  
1 Beacon Street  
Boston, Massachusetts 02108  
Phone: (617) 725-6128

**NEW JERSEY**

Great American Insurance Company  
5 Dakota Drive  
Lake Success, New York 11040  
Phone: (201) 224-4200

**NEW MEXICO**

CNA Insurance  
1660 Lincoln St., Suite 1800  
Denver, Colorado 80203  
Phone: (303) 266-0561

**NEW YORK**

Great American Insurance Company  
5 Dakota Drive  
Lake Success, New York 11040  
Phone: (516) 775-6900

**NORTH CAROLINA**

Kemper Insurance  
1229 Greenwood Cliff  
Charlotte, North Carolina 28204  
Phone: (704) 372-7150

**NORTH DAKOTA**

The St. Paul Fire & Marine Insurance  
Company  
254 Hamm Building  
408 St. Peter Street  
St. Paul, Minnesota 55102  
Phone: (612) 227-9581

**OHIO-NORTHERN**

Commercial Union Insurance Company  
1300 East 9th St.  
Cleveland, Ohio 44114  
Phone: (216) 522-1060

**OHIO-SOUTHERN**

CNA Insurance  
580 Walnut Street  
Cincinnati, Ohio 45202  
Phone: (513) 621-7107

**OKLAHOMA**

Republic-Vanguard Insurance Group  
P. O. Box 3000  
Dallas, Texas 75221  
Phone: (214) 528-0301

**OREGON**

State Farm Fire & Casualty Company  
4600 25th Avenue, N.E.  
Salem, Oregon 97303  
Phone: (503) 393-0101

**PENNSYLVANIA**

General Accident F & L Assurance  
Corp., Ltd.  
414 Walnut Street  
Philadelphia, Pennsylvania 19106  
Phone: (215) 238-5512

**PUERTO RICO**

I.S.O. of Puerto Rico  
Penthouse 7th Ochoa Bldg.  
7th floor, P.O. Box 1333  
San Juan, Puerto Rico 00902  
Phone: (809) 723-0000

**RHODE ISLAND**

American Universal Insurance Co.  
144 Wayland Avenue  
Providence, Rhode Island 02904  
Phone: (401) 351-4600

**SOUTH CAROLINA**

Maryland Casualty Company  
P. O. Box 11615  
Charlotte, North Carolina 28209  
Phone: (704) 525-8330

**SOUTH DAKOTA**

The St. Paul Fire & Marine Insurance Co.  
254 Hamm Building  
408 St. Peter Street  
St. Paul, Minnesota 55102  
Phone: (612) 227-9581

**TENNESSEE**

CNA Insurance  
110-21st Avenue South  
Nashville, Tennessee 37203  
Phone: (615) 327-0061