

Sewage Sludge Interim Permitting Strategy

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SEWAGE SLUDGE INTERIM PERMITTING STRATEGY

STATEMENT OF POLICY

In order to implement the requirements of Section 405(d)(4) of the Clean Water Act, it is EPA policy that:

1. All NPDES permits issued or reissued to POTWs after February 4, 1987 shall at a minimum: require that the permittee comply with all existing federal regulations governing the use and disposal of sewage sludge, and with applicable 40 CFR Part 503 Standards for the Use and Disposal of Sewage Sludge when promulgated; contain a statement that upon promulgation of 40 CFR Part 503 the permit may be reopened and modified or revoked and reissued to incorporate applicable requirements of 40 CFR Part 503; and require that the permittee notify the permit authority of any significant change in its sludge use or disposal practices.
2. Priority POTWs for the purposes of interim sludge permitting are "Class 1 sludge management facilities," defined as POTWs 1) that are required to have pretreatment programs, or 2) that have any other known or suspected problems with their sludge. Sludge incinerators are presumed to have "known or suspected problems" unless available information shows no cause for concern.
3. The following POTWs should be considered "priorities" for purposes of interim sludge permitting: "Class 1 sludge management facilities" (as defined by 40 CFR 122.2); POTWs that incinerate their sludge; and POTWs with known or suspected problems with their sludge quality or sludge use and disposal practices.
4. All NPDES permits issued to priority POTWs after February 4, 1987 shall contain, in addition to the minimum conditions in Paragraph 1, additional conditions developed on a case-by-case basis to ensure protection of the public health and environment.
5. Permit writers should use EPA's "Guidance for Writing Case-by-Case Permit Requirements for Municipal Sewage Sludge" for developing case-by-case permit conditions for priority POTWs.
6. All permits issued or reissued to POTWs should contain sludge monitoring requirements in accordance with the Sewage Sludge Interim Permitting Strategy.
7. States are encouraged to participate to the fullest extent possible in interim sludge permitting.

8. The proposed 40 CFR Part 503 numeric limits for the use and disposal of sewage sludge should not be relied on for developing interim permit conditions, because these numeric limits may change as a result of public comment or peer review. However, other information and methodologies found in the proposed Part 503 rule and preamble, and its Technical Support Documents, may be used if the permit writer determines their appropriateness for the sludge practice at issue.
9. States may obtain formal approval of their sludge programs prior to promulgation of the Part 503 standards. They may also elect to participate in interim permitting through agreements with their EPA Regional offices, pursuant to the Sewage Sludge Interim Permitting Strategy.
10. Where the State is issuing sludge permits pursuant to an agreement with the EPA Regional office, the Region will review all permits issued to priority facilities to determine if the permit meets CWA requirements. If the permit satisfies the CWA, the Region shall so certify and attach the certification to the permit.

I

INTRODUCTION

Section 405 of the Clean Water Act embodies Congress' concern with the environmental threats posed by unsafe sewage sludge use and disposal. Congress re-emphasized its concern in 1987 by amending this section to require EPA to develop detailed technical standards for sludge use and disposal that would be adequate to protect public health and the environment from sludge pollutants. The technical standards (to be codified at 40 CFR Part 503) will, when promulgated, identify pollutant levels of concern in sludge for the major use and disposal methods. However, before the standards are finalized, we need a program to identify and address potential problems that may be caused by contaminated or improperly disposed sludge, and to prepare for the implementation of the standards.

In the 1987 amendments to the Clean Water Act Congress recognized the need to take immediate action to regulate sludge. CWA Section 405(d)(4), as amended, requires that prior to the sludge standards, EPA must "impose sludge conditions in [NPDES] permits issued to [POTWs] ... or take such other measures as the Administrator deems appropriate to protect public health and the environment from any adverse effects which may occur from toxic pollutants in sewage sludge." Thus, the amendments direct EPA to protect the environment from unsafe sludge, and initiate sludge permitting. This phase of the program, which began with passage of the Water Quality Act on February 4, 1987, is referred to as the "interim" sludge program and is the primary subject of this Strategy.

The Act establishes a two-phase approach to regulating sludge use and disposal. The first phase, interim implementation, commenced with the passage of the amendments. The second phase, long-term implementation, begins with final promulgation of the first round of the technical standards. Those standards are to identify toxic pollutants of concern in sewage sludge, and specify numerical pollutant limits and management practices for sludge to ensure environmentally-sound use and disposal. The Clean Water Act requires that users and disposers of sewage sludge comply with the standards within one year from promulgation (two years if construction is required). The Act also requires that the standards be incorporated into permits issued to POTWs and other treatment works treating domestic sewage. The proposed standards were published on February 6, 1989 at 54 FR 5746; final regulations are scheduled to be promulgated in October 1991.

The purpose of interim implementation is to establish a program for long-term implementation, and to ensure that the environment is protected from improper sludge use and disposal

prior to promulgation of the technical standards. This Strategy provides the details of implementing the interim phase. The requirement to take immediate action to regulate sludge use and disposal takes on critical importance since technical regulations are not scheduled to be promulgated until 1991.

This document explains EPA's approach to sludge permitting prior to issuance of the technical standards. To best achieve the objectives of the Clean Water Act, the interim program utilizes existing experience, expertise, and permitting processes to focus permitting efforts on the facilities which, on the basis of available information, are thought to present greater risk. There are three principal components to the Interim Strategy:

1. All NPDES permits issued to POTWs after February 4, 1987 are to contain certain basic requirements for managing sludge. Many of these requirements were included as part of the May 2, 1989 Sludge State Program and Permitting Final Rule.
2. For certain "priority" ("Class 1") POTWs, additional permit conditions developed on a case-by-case basis are needed to satisfy CWA Section 405(d)(4).
3. Permits containing sludge conditions are to be issued by EPA, or by a State pursuant to a State/EPA agreement, or by a State program that has been approved pursuant to 40 CFR Parts 123 or 501, as appropriate.

Part II of this Strategy identifies permit conditions that are to be included in all POTWs' NPDES permits as they are reissued. The most significant change in the final Interim Strategy from the draft that was made available for public comment in a May 31, 1988 Federal Register notice is the discussion of standard permit requirements. The Sludge State Program and Permitting Requirements Final Rule, among other things, codifies the interim requirements of CWA Section 405(d)(4), and establishes standard requirements and application deadlines for including sludge conditions in all POTW permits. Thus, many of the permitting provisions in the draft Interim Strategy are now regulatory requirements. Part II describes the new requirements, additional recommendations, and sludge monitoring provisions.

A discussion of "Class 1" POTWs and the development of additional, case-by-case conditions for these facilities is found in Part III.

Part IV discusses State/EPA coordination on sludge permit issuance during this interim period. Many States currently have sludge permit programs. One of the objectives of this Interim Strategy is to build on these existing programs as much as

possible, while meeting the requirements of the Act. The purpose of this is to take advantage of the State experience and expertise in sludge control and reduce redundant and unnecessary permitting. Thus, where a State has a sludge permitting program in place but is not yet seeking formal approval, the Strategy provides for CWA Section 405(d)(4) interim permitting under a State/EPA Agreement. These agreements should be in place by December 30, 1989.

In summary, EPA and the States need to begin immediately to identify and address potential sludge problems, to lay the foundation for an effective permitting program that protects the environment and promotes resource recovery. EPA's statutory responsibility to take interim measures with respect to sludge requirements for POTWs became effective upon enactment of the Water Quality Act on February 4, 1987. This Strategy is designed to carry out these objectives as quickly as possible, focusing on the facilities of concern and building on existing experience and expertise. Throughout the interim period, the Office of Water Enforcement and Permits (OWEP) will be providing additional information and guidance on sludge program implementation through permits. OWEP is currently providing both technical guidance and contractor assistance to Regions and NPDES States to conduct permit writing. OWEP also has been holding permit writers workshops for the Regions and States on developing interim permit conditions. Implementation of this Strategy not only enables EPA and the States to carry out the immediate responsibilities under the Act to protect public health and the environment, but also furthers the objectives of facilitating compliance with the technical standards when promulgated and approving State programs to carry out the requirements of Section 405.

II

GENERAL REQUIREMENTS FOR ALL POTW PERMITS

This Part describes the requirements for sludge permitting that were promulgated on May 2, 1989 (54 FR 18716) and became effective on June 1, 1989. These regulations, called the sludge State program and permitting regulations, among other things codify the requirements for interim sludge permitting in CWA Section 405(d)(4). (See §122.1(g)(5)). In addition, this Part contains some additional recommendations for standard interim conditions for all POTWs. (Part III discusses additional permit conditions for "Class 1" facilities.)

All reissued POTW permits must include some general requirements for sludge use and disposal, whether or not the facility needs additional case-by-case limits. These are the minimum provisions necessary to begin permit coverage of sludge use and disposal practices in anticipation of the long-term program, and to enable sufficient oversight of these activities in the interim. Most of these provisions are now required specifically by regulation. See 54 FR 18716 (May 2, 1989). The four primary areas each permit must address are: compliance with existing requirements; reopening the permit when the 503 regulations are promulgated; notification of change in sludge practices; and sludge quality monitoring. Attachment 1 contains a list of NPDES boilerplate conditions revised to include sludge conditions in accordance with the May 2, 1989 final rule, establishing new sludge permitting requirements.

Application Deadline

Section 122.21, which contains the NPDES permit application requirements, was revised by the May 2, 1989 notice to include permit application deadlines and application requirements for sludge. Under §122.21(c)(2), all POTWs with NPDES permits must submit information (including: sludge production, sludge use and disposal practices, and existing information on sludge quality, as set forth in §501.15(a)(2)) with their application for NPDES permit renewal, or 120 days after promulgation of the technical sludge standards, whichever occurs first. (All other "treatment works treating domestic sewage" do not need to submit an application for sludge permit coverage until 120 days after promulgation of applicable sludge technical standards, unless requested by the permit authority where necessary to protect public health and the environment. §122.21(c)(2)(ii).)

Boilerplate Conditions

The first standard permit condition is a compliance provision: the permit must require the POTW to comply with all existing requirements for sludge use and disposal.

§122.44(b)(2). For example, a POTW that applies its sludge to land is subject to the applicable requirements of 40 CFR Part 257. This compliance must be required in the permit and monitored by permit oversight.

Permit writers should ascertain the existence of any other permit governing the facility's sludge use or disposal practices before developing sludge conditions for the NPDES permit, whether the facility is a priority or not. Under the new regulations, applicants are required to submit a list of other permits governing their sludge management activities issued or applied for under other laws (§122.21(d)(3)(ii); §501.15(a)(2)(v)). For example, an incinerator may currently be subject to a permit under the Clean Air Act, a landfill under a RCRA permit, or the facility may be subject to a State permit. If these are adequate to satisfy Section 405(d), the NPDES permit need only reference the other permit, and add any additional requirements if necessary to protect public health and the environment. Also, in the course of developing the other permit, the permitting agency may have information on the sludge quality or use and disposal practices that may save the NPDES permit writer considerable time and effort.

This compliance provision also requires compliance with the sludge technical standards by the deadlines established in those standards. This provision restates (and puts the permittee on notice of) the CWA Section 405 requirement that users and disposers of sewage sludge comply with the technical standards for sludge use and disposal by the statutory compliance deadlines (i.e., within one year after promulgation of the standards, or within two years if the standards require construction), even if the permit has not been modified to include such requirements. See §122.41(a)(1). Any "permit-as-shield" provision in the permit also should be revised to indicate that compliance with "interim" permit conditions does not excuse noncompliance with subsequently promulgated technical sludge standards. See §122.5.

Another permit condition is a reopener clause, which authorizes reopening a permit to include technical standards if the technical standards are more stringent or more comprehensive than the conditions in the permit. See §122.44(b)(2) and (c)(4). This enables, but does not require, reopening the permit if the permit writer feels it is necessary to incorporate final Part 503 requirements. Consistent with the sludge State program and permitting regulations, reopening the permit when the technical standards are promulgated is discretionary with the permitting authority, not mandatory. Thus, the permitting authority will have flexibility to establish permitting priorities for implementing the technical standards. OWEPA anticipates issuing additional guidance on this subject when Part 503 is promulgated.

The reopener provision notifies the permittee of future legal obligations under the Act, and of the potential need to modify the permit to incorporate Part 503 requirements once they are promulgated. The reopener provision also enables the permitting authority to develop permit conditions to assure compliance with the technical standards by the deadlines established in Section 405(d)(2) of the CWA. Revisions to §122.62(a)(7) now specifically authorize permit modifications pursuant to the reopener provision. The statement of basis or fact sheet for the permit should include a reference to the compliance provision and any other provisions that are in the permit to implement Section 405.

A notification provision, now codified in revisions to §122.41(l)(1)(iii), must be included in all reissued permits. This requires the permittee to give notice to the permitting authority when a significant change in the sludge use or disposal practice occurs (or is planned) that could require permit modification under 40 CFR 122.62(a)(1). The permittee need not notify the permit authority of every change, however slight, to its sludge use and disposal activities. However, a change in the POTW's sludge disposal methods, for example from landfilling to land application, is certainly significant as it could be cause for permit modification. Notice of, and possible permit modification for, new use or disposal sites not previously identified to the permitting authority (except land application sites covered by an approved land application plan) is also required (§122.41(l)(i)(iii)).

In addition to the standard sludge boilerplate conditions described above, (see Attachment 1 for permit language), the preamble to the recent revisions to the Part 122 regulations explains that many of the standard permit conditions that apply to effluent discharge activities will also apply to sludge use and disposal activities (e.g., duty of proper operation and maintenance; entry and inspection duties). Conversely, a few of the Part 122 regulations have been revised to limit their applicability only to effluent discharge activities (e.g., the "anti-backsliding" provision in §122.41(l)). Additionally, several provisions remained unchanged because the existing language was sufficient to include or exclude sludge use and disposal activities, as appropriate. The preamble discussion at 54 FR 18743 explains which provisions apply and do not apply to sludge activities. Permit writers should make revisions to the standard boilerplate conditions consistent with the revised regulations.

Monitoring Conditions

Another important component of interim permitting is sludge quality monitoring. Sludge monitoring to establish baseline data on each facility for future permit requirements is especially

critical as most interim permits, at least in the beginning, will contain few, if any, concentration limits for pollutants in sludge (and therefore, compliance monitoring will yield only limited information). Thus it is important for fulfilling the statutory requirement to protect public health and the environment that the permit writer have current information on pollutant concentrations, to alert the permit writer as to excessive loadings that may make a given sludge use or disposal method unsafe.

The regulations now require sludge monitoring and reporting at a frequency dependent on the nature and effect of the permittee's sludge use or disposal activities, but at least once a year (§122.44(i)(2)). This means that where the permit contains pollutant limits (e.g., the permit to a POTW that applies its sludge to land must contain the 40 CFR Part 257 limits for cadmium and PCBs, and pathogen requirements), the permit must require the permittee to sample and analyze those pollutants at least once a year. Beyond compliance monitoring, the regulations do not specify which pollutants in sludge must be monitored in the interim before promulgation of the technical standards. Similarly, the sludge application requirements do not specify standard monitoring results which must be submitted for permit issuance (although they do require applicants to submit all available data).

Because the regulations only require compliance monitoring, and because compliance monitoring, given the fact that few permits are likely to contain pollutant limits, will not yield enough information, the permit writer should require monitoring of additional pollutants, based on his/her best professional judgment. In some cases the permit may already require sludge sampling and analysis, and the permit writer may have a good idea as to the quality of the sludge and the levels of pollutants it contains. In the absence of such information, EPA recommends that at a minimum, the permit writer include the following monitoring requirements in the permit:

- o For Class 1 POTWs, an annual scan of the 126 priority pollutants, and more frequent monitoring of the pollutants for which numeric limits have been proposed for the POTW's particular use or disposal practice in the proposed Part 503 regulations (see Attachment 4).
- o For non-Class 1 POTWs with industrial users, a priority pollutant scan at the time of permit application, and annual monitoring of the pollutants for which numeric limits have been proposed for the POTW's particular use or disposal practice in the proposed Part 503 regulations (see Attachment 4).

- o For non-Class 1 POTWs with no industrial users, annual monitoring of six metals: cadmium, copper, chromium, lead, nickel, and zinc.

Of course, monitoring requirements would be tailored to the particular POTW and would take into consideration site-specific factors, such as the types of industrial wastes the POTW receives. At the discretion of the permit authority, if a pollutant is not detected or is detected at low levels that clearly show no cause for concern after repeated tests, future testing for those pollutants need not be required unless a change occurs at the POTW.

The reason for monitoring for the pollutants proposed to be limited in the Part 503 proposed rules is so the POTW and the permit authority will have sufficient information on sludge quality with regard to those pollutants when the Part 503 rules are finalized. This is particularly important in light of the one-year compliance deadline mandated by the Clean Water Act. (Note that once the Part 503 regulations are promulgated, monitoring parameters will be governed by those rules (and 40 CFR Part 122.44(i)(2)). The Guidance for Writing Case-by-Case Permit Conditions for Municipal Sewage Sludge (described in Part III) contains further recommendations for developing conditions for additional baseline monitoring for pollutants of concern and compliance monitoring for each major use and disposal practice. (A list of the pollutants proposed to be regulated in 40 CFR Part 503, by use or disposal method, is provided in Attachment 4.)

This Strategy recommends that non-Class 1 POTWs with no industrial users at a minimum sample for six metals that are commonly found in sewers at significant levels due to commercial and domestic discharges to the treatment works. If the permit writer has pre-existing data on the sludge quality of the facility that shows no cause for concern with particular pollutants for that POTW's sludge practices (i.e., routine readings of particular pollutants which are very low or not detected), monitoring for that pollutant does not need to be continued unless there is a change at the POTW. Another exception is for POTWs that use wastewater stabilization lagoons as the sole treatment process. For these facilities, where the sludge will not be removed from the lagoon during the permit term, the permit need not contain any sludge monitoring provisions unless the permit writer determines they are needed. (If such permit does not require monitoring, it should contain a requirement that the permittee notify the permit authority if it happens that the sludge is pumped out of the lagoon within a one-year period.)

The permit should also specify appropriate sampling protocols. To develop these requirements, permit writers are directed to two sources. The first is entitled "POTW Sludge

Sampling and Analysis Guidance Document," EPA, Office of Water Enforcement and Permits, 1989. This document is designed to provide information on the sampling and analysis of municipal sewage sludge, and contains discussions of procedures and protocols, and current developments on specific topics such as pathogen equivalency determinations. The second document is entitled "Sampling Procedures and Protocols for the National Sewage Sludge Survey," EPA, Office of Water Regulations and Standards, 1988. The sampling procedures and protocols included in this document were compiled specifically for the National Sewage Sludge Survey, which the Agency has initiated to gather additional information on the pollutants in sewage sludge to support the Part 503 rulemaking.

The permit also should specify the acceptable analytical methods. A notice published at 53 FR 39133 (October 5, 1988) lists all pollutants, and the methods used to analyze them, that were tested in the national sewage sludge survey. The question of appropriate analytical methods for determining pollutant concentrations in sewage sludge has been an ongoing one. Methods 624 and 625, found in 40 CFR Part 136, are essentially adapted from wastewater analytical methodologies. These methods have been in longer use and thus are more widely available. EPA's newer isotope dilution, gas chromatography/mass spectrometry (GC/MS) methods 1624 and 1625 have been developed specifically for sewage sludge. The permit writer may specify these methods or other EPA-approved methods, or methods that are deemed comparable based on their precision, accuracy, lab availability, interlab variability, and the level of detection needed to monitor compliance.

Most of the general monitoring and recordkeeping requirements in Part 122 apply to sludge monitoring and recordkeeping (e.g., §§122.41(j) and 122.48). There are two important differences, however. First, the regulations do not currently prescribe specific monitoring reporting forms. Instead, the permitting authority has discretion to determine an appropriate form (§122.41(l)(4)(i)), which should be specified in the permit. Second, the record retention time for sludge records is five years, rather than the three-year period that applies to effluent discharge recordkeeping. (§122.21(p) and §122.41(j)(2)). (The rule provides a longer record retention time for sludge because of the need to track cumulative loadings for metals in sludge that is applied to land over a longer period. The five-year record retention time will enable this information to be "carried over" when the permit is reissued.)

Summary

In sum, to fulfill the objectives that Congress has established in Section 405(d), we must begin as soon as possible to establish permit requirements for sludge. All POTW permits

must include compliance provisions, notification language, and monitoring requirements as described above and specified in the regulations, and should include sludge quality monitoring as set forth in this Strategy. In addition, case-by-case permit requirements will need to be developed as appropriate. This is discussed in Part III.

III

CASE-BY-CASE CONDITIONS FOR CLASS 1 POTWS

The previous section discusses basic permit requirements for all NPDES permits issued or reissued to POTWs after February 4, 1987. There are situations, however, where more comprehensive, site-specific permit coverage may be warranted. This may mean more frequent monitoring or other site-specific conditions such as management practices or numeric limitations developed on a case-by-case basis. This gives rise to two questions: which POTWs should receive more comprehensive permit coverage during this interim period, and what should be included in the permits issued to such facilities.

Identifying Permitting Priorities: Class 1 Sludge Management Facilities

A major purpose of requiring case-by-case sludge limits only for certain POTWs is to target available resources for sludge permitting on critical sites. In earlier versions of this Strategy, which generally referred to POTWs with known or suspected problems with sludge quality or use/disposal practices, or those warranting more comprehensive sludge permit conditions for other reasons. The draft Strategy suggested that pretreatment POTWs, POTWs incinerating their sludge, POTWs using or disposing of sludge in ecologically-sensitive areas such as estuaries, and new POTWs should be evaluated closely to determine if they should be included in the priority category.

The recently promulgated sludge management regulations also identify a group of POTWs targeted for closer oversight because of the greater potential for their sludge use and disposal to adversely affect public health or the environment. These are called "Class I sludge management facilities." Thus, this definition and the earlier "priority" POTW designation serve similar purposes and are based on the same rationale. To facilitate long-term implementation, "Class I sludge management facilities" will be presumed to need case-by-case sludge interim limits (i.e., they should be considered permitting priorities), unless the permitting authority determines, based on information about the facility's sludge quality and use or disposal practices, that the sludge is adequately controlled already. In this Strategy, the terms "priority" and "Class 1" facility are used interchangeably.

A Class I sludge management facility is defined as:

...any POTW identified under 40 CFR 403.8(a) as being required to have an approved pretreatment program (including such POTWs located in a State that has elected to assume local program responsibilities

pursuant to 40 CFR 403.10(e)) and any other treatment works treating domestic sewage classified as a Class I sludge management facility . . . because of the potential for its sludge use or disposal practices to adversely affect public health and the environment.

Pretreatment POTWs were included in the definition of "Class I sludge management facility" in response to numerous requests for more specificity in defining priorities. In addition, the same factors that determine whether a POTW should be required to develop a local program (i.e., size, industrial users subject to pretreatment standards, or necessary to prevent pass-through or interference with the POTW's operations) also suggest that sludges from pretreatment POTWs have a greater potential for having significant impacts on public health and the environment.

"Class I sludge management facility" also includes other treatment works with known or potential sludge problems. In assessing the risks associated with the various sludge use and disposal options, EPA has found that the potential risk levels are highest for incinerators. In addition, in a recent Agency study of comparative risks, sewage sludge incinerators were identified as one of the potentially more harmful sludge use and disposal practices. Overall, the risk was assessed to be in the middle range in comparison to other environmental problems. See "Unfinished Business: A Comparative Assessment of Environmental Problems," U.S. EPA, Office of Policy, Planning and Evaluation, February 1987. Because of this, POTWs using incineration should be presumed to need case-by-case sludge permit limits, unless the permit writer has information demonstrating that there is no cause for concern. (Note: Most POTWs incinerating their sludge are also pretreatment POTWs. Therefore, only those POTWs using incineration which are not required to have pretreatment programs will need to be considered additionally. See Attachment 3.)

Attachment 2 contains listings of pretreatment permits that have expired or expire in FY89 and FY90. A separate listing shows the POTWs that incinerate their sludge and gives the expiration dates for the NPDES permits.

Other POTWs may have known or potential sludge use and disposal problems. A POTW in non-compliance with existing federal regulations (e.g., 40 CFR Part 257) is one example. When the NPDES permit is due to be reissued, the permitting authority will need to make a determination whether the facility will need case-by-case limits. Case-by-case limits should not be rejected simply because the permitting authority has no knowledge of any sludge problems. Instead, the permit writer should take reasonable steps to ascertain the nature of the facility's sludge and sludge disposal practices. Under the May 2, 1989 sludge management regulations, POTWs are required to submit basic background information and available monitoring results on their

sludge and use and disposal methods with their NPDES permit renewal application. 40 CFR 122.21(c)(2). Other available information also should be examined, such as pretreatment audit reports and investigations into interference problems at the POTW, to see if any problems with sludge have been identified. Also, POTWs conducting sludge use or disposal in ecologically sensitive areas, such as estuaries, may warrant more comprehensive sludge permit conditions beyond the basic boilerplate and monitoring requirements.

Permits issued to POTWs with new sludge treatment facilities should also be carefully considered for development of case-by-case sludge conditions. Although known problems may not exist, preventing problems through careful controls at new facilities is generally easier for both the permitting authority and permittee than taking remedial action after a problem has developed. (Note: this paragraph does not refer to situations where a POTW has switched to another existing facility, for example, to a different monofill, but rather, refers to treatment facilities that are newly constructed.)

One commenter on the draft strategy suggested that the nine sewerage authorities in New York and New Jersey that dispose of their sewage sludge in the ocean should also be identified as a "priority" for interim sludge permitting. The Marine Protection, Research and Sanctuaries Act of 1972 (MPRSA) regulates ocean disposal, and prohibits ocean dumping without a permit issued pursuant to MPRSA. In November 1988, Congress passed the Ocean Dumping Ban Act, amending MPRSA. Among other things, the purpose of this Act is to terminate the ocean-dumping of sewage sludge by December 1991. The significance of this legislation for the implementation of Section 405 of the CWA is that after December 31, 1991, it will be unlawful to dispose of sewage sludge in the ocean, and those POTWs that currently ocean-dispose of their sewage sludge will have to develop land-based sludge management alternatives, which will be subject to the jurisdiction of Section 405 of the Clean Water Act. Prior to the termination of dumping, State and Regional NPDES and sludge permit writers should work with the POTWs and MPRSA authorities to identify the quality of the sewage sludge and assist the POTWs in developing land-based sludge use or disposal methods. This involvement is not for purposes of regulating the practice of ocean disposal, which will be effected through the MPRSA permit process, but rather, to assist the facility in implementing land-based disposal methods that will meet the requirements of CWA Section 405.

Case-by-Case Permit Conditions

To assist permit writers in developing more comprehensive permit conditions for Class 1 facilities, EPA has developed a "Guidance for Writing Case-by-Case Permit Requirements for

Municipal Sewage Sludge" ("CbC Guidance"). The purpose of the guidance is to assist permit writers in developing appropriate permit conditions for sludge and EPA permit writers in reviewing State permits issued to Class 1 POTWs.

As stated earlier, the most important task for the interim period is to ensure that existing requirements are written into permits. Use of the CbC Guidance ensures that existing applicable federal and State requirements are incorporated into permits issued to Class 1 POTWs. Its use should help to promote timely compliance with the Part 503 sludge regulations when issued, by those POTWs most likely to cause adverse effects from pollutants in sewage sludge. (The Part 503 sludge regulations will require compliance within one year from promulgation.) In addition, compliance with the monitoring requirements specified will provide information on sludge quality and the use and disposal practices at the POTW, and help to identify potential problems.

As a "best professional judgment" guidance document, the CbC Guidance presents: 1) a compilation of existing federal and State requirements for sludge; 2) existing guidance; and 3) recommendations for permit writers to consider writing into permits on a case-by-case basis using their best professional judgment. The CbC Guidance sets forth existing requirements for each of the major sludge use and disposal practices. Additionally, the Guidance contains recommendations for further permit conditions. In general these recommendations consist of management practices, although some recommended numeric limits are given, based on existing guidance. The CbC Guidance states that EPA permit writers must write existing federal sludge requirements into NPDES permits or incorporate them by reference to other permits.

The Guidance may be used by Regional and State permit writers to assist them in arriving at appropriate permit limits for priority facilities, and by the Regions in reviewing State-issued permits. The fact sheet or statement of basis accompanying the permit must explain the basis for arriving at the sludge requirements. EPA and States may take further action beyond what may be specified in the guidance, where appropriate to protect public health and the environment where particular problems are identified and a basis for the requirements is established.

Interim Conditions and the Proposed 503 Standards. EPA recently proposed technical standards for the use and disposal of sewage sludge (54 FR 5746; February 6, 1989). This rulemaking is being developed to meet the requirement in Section 405(d) that EPA promulgate regulations identifying sewage sludge use and disposal methods and concentrations of pollutants that interfere with each method. The proposed Part 503 regulations address sewage sludge incineration, land application, landfilling,

distribution and marketing, and surface disposal. EPA has also developed technical support documents for each method.

The Interim Strategy and the CbC Guidance are designed primarily for use before issuance of the final technical standards. The focus of the interim program is on identifying and addressing, through permits, existing or potential problems with sludge use or disposal, in the absence of promulgated technical standards. In developing permit limits for POTWs in the interim, the primary source of information for permit writers should be the Case-by-Case Guidance. Information from other sources, of course, may be considered and evaluated by the permit writer in the exercise of his or her best professional judgment. These include, for example, the proposed 503 rule and preamble, its technical support documents, and available information from the National Sewage Sludge Survey.

The proposed 503 standards are currently undergoing public comment and peer review. These processes, as well as the results of the National Sewage Sludge Survey may result in final standards that are significantly different from the proposal. In light of these circumstances, reliance on the proposed standards should be limited. The permit writer should not rely on the proposed numeric limits in developing case-by-case sludge conditions unless the permit writer can independently establish the appropriateness of such conditions based on the circumstances of the particular sludge practice at issue. As previously noted, any sludge conditions, other than those based on existing regulations, must have a sound technical basis explained in the fact sheet that accompanies the permit.

IV

STATE AND EPA COORDINATION ON INTERIM SLUDGE PERMITTING

EPA seeks to encourage States with existing, effective sludge management programs to carry out the program for implementing interim sludge permitting under the CWA to the extent that they are willing and able to do so. This Part describes the minimum requirements necessary for State interim permitting, and the procedures for establishing State/EPA coordination in the permitting process.

EPA interprets CWA Section 405(d)(4) to allow State/EPA coordination, whereby States with existing effective sludge management programs could carry out interim sludge permitting. This is beneficial for the national sludge program because States with effective programs are more likely to know which particular facilities or practices may be causing problems. Moreover, involving States now serves the dual purpose of minimizing disruption to existing State programs and reducing duplication of effort by EPA and the States.

The sludge State program and permitting regulations, promulgated on May 2, 1989, provide for formal submission of State sludge programs for review and approval by EPA. States may, but do not need to, seek formal approval, pursuant to the May 2, 1989 rules, during the interim phase to carry out interim and long-term permitting. They may also opt to rely on more informal arrangements with the EPA Regions, as this Part explains. States that are not yet seeking formal approval are encouraged to use this interim period to evaluate their programs in light of the requirements for approvable sludge State programs to identify areas where their programs may need to be changed or augmented in order to be approved.

Establishing State/EPA Coordination

A. Minimum Requirements

The 1987 CWA amendments give EPA the flexibility to rely on State sludge management activities to carry out the objectives of the Act for interim sludge requirements. Where the State chooses to participate in the interim program through an agreement, the Agency will take steps to ensure that any measures are adequate to protect public health and the environment by overseeing State efforts. To accomplish this, this Strategy adopts a two-pronged approach which targets facilities of concern for oversight.

For all NPDES POTWs that are defined as Class 1, the Region will review the sludge requirements in each State-issued permit (or other individual control mechanisms) to make sure they incorporate existing federal requirements and meet the objectives

of the Clean Water Act. The CbC Guidance is intended to assist the Regions in this review. The review of the sludge conditions could be built into the Region's process for reviewing State permits issued to NPDES majors.

Section 405(d)(4) authorizes only the Administrator to impose conditions in NPDES permits or take other appropriate measures. Thus, to be recognized under Section 405(d)(4), conditions imposed by States must be approved/adopted by EPA. To accomplish this, three steps are required. First, a State which issues a Class 1 permit would state in the public notice of the draft permit that the permit (or facility-specific plan) will contain sludge requirements to implement the requirements of Section 405 of the CWA and therefore will be federally enforceable pursuant to Section 309 of the Act. Second, the Region must review the permit and determine whether it satisfies the requirements of the interim program. Finally, the Region must affirmatively approve the permit by issuing a letter or certification to the State permitting agency. This written documentation of EPA approval should also be attached to the permit. (A sample certification letter is in Attachment 5.) Following these steps should enable EPA to take action to enforce interim sludge requirements in these permits where appropriate (e.g., joint enforcement actions with the State, cases of national significance, etc).

The public notice and permit-by-permit EPA approval requirements applicable to permits for Class 1 POTWs will not be required for non-Class 1 POTW permits. However, for interim implementation purposes, a State must be able to impose the minimum requirements for these other permits set out in Part II. EPA will also oversee the State's activities in imposing the minimum requirements on non-Class 1 permits. However, oversight will not be required on a permit-by-permit, or individual POTW, basis, but may be accomplished through other means, such as periodic file or permit reviews and annual program reviews.

B. State Eligibility

Any State with an effective sludge permitting program may participate in the implementation of interim sludge requirements, regardless of that State's NPDES participation or status. In seeking State involvement, EPA will need to determine the extent to which the State is willing and able to implement this Strategy for carrying out the responsibilities created by Section 405(d)(4). State participation should be encouraged to the maximum extent possible. Where States either cannot (for example, because they lack legal authority) or will not participate, EPA will remain responsible for imposing sludge requirements. Where the State will not undertake sludge permitting and EPA is the NPDES permitting authority, the EPA permit writer

would simply include sludge requirements in the reissued NPDES permit. Where the State has NPDES authority, EPA would issue a "sludge rider" to the State-issued NPDES permit or issue a separate Section 405 sludge permit. (Attachment 6 contains a model EPA "sludge rider".) Wherever possible, State and EPA sludge permitting activities should be coordinated to assure consistency and minimize duplication of efforts. (See, for example, 40 CFR 124.4 on joint permitting procedures.) In most cases, interim implementation will require the combined efforts of States and EPA Regional Offices to protect the environment adequately and put an effective sludge program in place. The degree of participation will likely vary from State to State. States need not assume full responsibility for interim permitting in order to participate. For example, a State may currently regulate only one disposal practice. In that case, the State could agree to cover interim sludge permitting for that particular practice, and EPA would issue permits for the other use and disposal practices.

C. Procedures for Establishing State/EPA Coordination

Establishing State/EPA coordination in interim permitting involves two steps: (1) the State must identify the extent to which it is able and willing to participate; and (2) the State and the Region would execute an agreement establishing the responsibilities of EPA and the State in the interim sludge permitting process.

Regional offices should contact each State about its capacity to undertake interim implementation activities. Execution of an agreement will be necessary with any State that agrees to participate. This agreement could be part of the Section 106 planning process or any other appropriate vehicle that defines EPA/State roles in program implementation.

(1) State's Declaration

Initially, the State should identify the capacity of its existing program to regulate the sludge use and disposal practices of its POTWs in comparison to the minimum requirements established in the CbC Guidance and Parts II and III of this Strategy. Generally, EPA will rely on the State's declaration of its capacity (i.e., resources and legal authority to impose and enforce interim sludge requirements). As noted above, a State need not assume full responsibility for all sludge permitting in order to participate. For example, a State may currently regulate only land application of sludge. The State could agree to be responsible for permitting only the POTWs which use this disposal method now. Later, if the State's program expands to include regulation of other disposal options, it could expand its role in interim implementation. EPA will encourage States that cannot assume full sludge permitting immediately to increase

their permitting capabilities over time. Where a POTW uses more than one disposal option and the State does not regulate all options, EPA must "fill in the gaps" either by issuing a sludge rider to the State-issued permit (see Attachment 6) or a separate Section 405 permit. If known in advance, this specific situation should be addressed in the State/EPA sludge agreement.

(2) State EPA Sludge Agreement

After the State has expressed its willingness to participate in interim implementation, the Region should enter into an agreement with the State establishing their respective responsibilities for interim implementation of sludge requirements, especially permitting responsibilities and information exchange between the State and the Region. The agreement also may include provisions about other aspects of EPA-State coordination of sludge management activities as well (e.g., coordination of inspections and enforcement actions). The agreement may be flexible in many respects, but it should clearly identify permitting responsibilities of the State and EPA in establishing sludge requirements.

The agreement may be an annual workplan negotiated as part of the Section 106 process, but the Region and State should consider documenting longer term understandings for development of a full State program with EPA's assistance. The agreement may be executed as a revision to an existing agreement or as a separate agreement. In NPDES States, revisions to the NPDES Memorandum of Agreement (MOA) may also be necessary if it conflicts with any of the provisions described below. Also, if the MOA waives EPA review of minor POTW permits, this waiver would have to be modified to facilitate review of permits for minor POTWs which are classified as Class 1 permits for sludge purposes and thus require EPA review. See §123.24(d).

The State/EPA sludge agreement should include provisions to address the following:

- o Identification of the POTW permits the State will be responsible for, those EPA will be responsible for, and those for which EPA and the State will assume joint responsibility;
- o For permits for which EPA assumes responsibility, a description of how the Region will issue the sludge permit (i.e., by issuing a "sludge rider" to the State-issued NPDES permit, through joint issuance of the permit or by issuing a separate EPA NPDES sludge permit);
- o Provisions for joint issuance of permits, where appropriate;

- o Provisions for EPA review and comment on all Class 1 permits drafted by the State, and agreement that if EPA determines that State limits are not adequate in any specific case, EPA will issue a "sludge rider" or separate sludge permit to the POTW;
- o For sludge Class I permits with sludge conditions the State issues, agreement by the State to include in the public notice of the draft permit, in addition to other information that may be required by State or federal requirements, a statement that the draft permit includes conditions implementing interim sludge requirements pursuant to Section 405(d) of the CWA and, therefore, will be federally enforceable pursuant to Section 309 of the CWA after review and approval by EPA (see Attachment 7 for language);
- o State's agreement to include in permits issued to non-Class 1 POTWs the minimum conditions described in the "Sewage Sludge Interim Permitting Strategy";
- o Provisions that establish the State's compliance monitoring and enforcement activities for the permits it agrees to issue (See Attachment 7);
- o An agreement to share, upon request, the results of any sludge monitoring activities (e.g., self-monitoring and inspection reports);
- o Provisions that recognize that the agreement is not a substitute for formal program approval and that EPA approval of the State sludge program will be needed for purposes of long-term implementation (i.e., after final promulgation of the Part 503 technical criteria, which is scheduled for 1991); and
- o Any agreements concerning activities to build up the State program in preparation for obtaining formal program approval.

A model State/EPA sludge agreement is found in Attachment 7.

Even when a State with an existing sludge management program does not actively participate in interim permitting, EPA permit writers should look to the State as a valuable resource and consider adopting by reference existing State permits and/or requirements. As with State requirements affirmatively approved by EPA, including State requirements in the NPDES permit means that EPA is adopting those requirements as its own and therefore must be prepared to enforce and defend them.

D. Timetable

It is crucial that Regions and States begin now to work out the details for establishing State participation in interim implementation. The State/EPA sludge agreements should be executed as soon as possible, but no later than December 31, 1989. A copy of any agreements should be sent to the Cynthia Dougherty, Director, Permits Division, Office of Water Enforcement and Permits.

Attachment 1

Boilerplate Revisions for Sludge

ATTACHMENT 1

BOILERPLATE REVISIONS FOR SLUDGE (Based on May 2, 1989 Final Regulations)

The following boilerplate provisions for NPDES permits issued to POTWs should be changed in accordance with the final rule published on May 2, 1989 (54 FR 18716), which establishes new sludge permitting requirements.

- o §122.41(a)(1). Requires compliance with standards for sewage sludge use or disposal established under section 405(d) of the CWA by the deadlines established in the standards, even if the permit has not been modified to include the new standards.
- o §122.41(d). States that the "duty to mitigate" includes the duty to take all reasonable steps to minimize or prevent any sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.
- o §122.41(j)(2). States that records of monitoring required by the permits related to sludge use and disposal activities must be kept at least 5 years (or longer as required by 40 CFR Part 503).
- o §122.41(j)(4). States that sludge monitoring procedures shall be those specified in 1) Part 503; 2) Part 136; or 3) other procedures specified in permit (in that order of "preference" depending on the availability and applicability of a particular method at the time the permit is issued).
- o §122.41(l)(1)(iii). Requires notice to the permitting authority of planned changes in the facility when the "alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan."
- o §122.41(l)(4)(i). States that sludge monitoring results are to be reported on a form provides or approved by the permitting authority.
- o §122.41(l)(4)(ii). Requires the permittee to submit results of sludge monitoring done more frequently than required by the permit.

In addition to boilerplate revisions, other revisions in the May 2, 1989 final rule govern the development of key sludge permit conditions, including:

- o §122.5. Exclusion of section 405(d) requirements from the permit as shield provision and creation of a limited affirmative defense for compliance with permit conditions implementing a technical standards. (Note: The affirmative defense does not apply to interim limits.)
- o §122.21(p). Requirement that sludge application information be retained for five years.
- o §122.44(b)(2). Requirement that permits include any applicable technical sewage sludge standards; authorization of CbC limits in the absence of applicable technical standards; provision for modifying or revoking and reissuing a permit to include a more stringent, subsequently promulgated technical standard.
- o §122.44(c)(4). Requirement that permit contain a reopener provision for subsequently promulgated technical standards.
- o §122.44(i)(2). Requirement that permit contain provisions for monitoring and reporting at a frequency dependent on the nature and effect of the sewage sludge use or disposal practice, but minimally as specified in 40 CFR Part 503, but in no case less than once a year.
- o §122.62(a)(1). Authorizes modification or revocation and reissuance of the permit for changes in sludge use or disposal practices.
- o §122.62(a)(7). Authorizes modification or revocation and reissuance of the permit in accordance with the reopener provision required by §122.44(c)(4).
- o §122.62(a)(18). Authorizes modification or revocation and reissuance of the permit to incorporate, revise, or add a land application plan.

A final revision in the May 2, 1989 rule worth noting is to §122.41(l)(1), the "anti-backsliding" provision. This provision was revised so as to limit "anti-backsliding" requirements only to surface water discharges. Therefore, it does not apply to sludge use and disposal activities.

Attachment 2

Expired and Expiring Permits for Pretreatment POTWs

09/27/89

**PRETREATMENT POTM'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90**

QL *****

REGN	NPID	FNMS	MADI	PRET	PERE
10	AK0023481	FAIRBANKS, CITY OF	MAJOR	Y	01/30/90
06	AR0033270	FORT SMITH, CITY OF ("P" STREE	MAJOR	C	08/29/89
06	AR0020702	BATESVILLE, CITY OF	MAJOR	Y	09/17/89
06	AR0022039	WEST MEMPHIS, CITY OF	MAJOR	Y	03/29/90
06	AR0022403	BENTONVILLE, CITY OF	MAJOR	Y	07/11/90
06	AR0021806	LITTLE ROCK, CITY OF	MAJOR	Y	07/21/90
06	AR0022107	CLARKSVILLE, CITY OF	MAJOR	Y	08/08/90
06	AR0021768	CITY CORPORATION	MAJOR	Y	08/30/90
06	AR0020273	SILOAM SPRINGS, CITY OF	MAJOR	Y	09/20/90
06	AR0022063	SPRINGDALE, CITY OF	MAJOR	Y	09/20/90
06	AR0022560	BLITHEVILLE, CITY OF (FACILITY	MAJOR	Y	09/27/90
09	AZ0022070	MESA, CITY OF	MINOR	C	
09	AZ0020443	YUMA, CITY OF	MAJOR	Y	10/01/79
09	AZ0020346	WILLIAMS, CITY OF	MINOR	C	01/31/89
09	AZ0021073	CASA GRANDE, CITY OF	MAJOR	Y	08/31/89
09	AZ0020330	TOLLESON, CITY OF	MAJOR	Y	08/31/90
09	CA0030679	LIVERMORE-AMADOR MTP	MINOR	C	
09	CA0110406	SAN FRANCISCO C & C	MINOR	C	
09	CA0053013	L.A. CNTY SAN. DIST.	MAJOR	Y	06/10/82
09	CA0053056	LOS ANGELES, CITY OF	MAJOR	C	07/01/83
09	CA0106034	JURUPA COMMUNITY S.D	MINOR	Y	06/01/84
09	CA0037591	UNION SAN. DIST.	MINOR	Y	06/19/84
09	CA0106267	NORCO, CITY OF	MINOR	Y	01/01/85
09	CA0037559	ORO LOMA SAN DIST.	MINOR	Y	08/05/85
09	CA0106036	IRVINE RANCH M.D.	MINOR	Y	09/01/85
09	CA0053953	LOS ANGELES, CITY OF	MAJOR	C	01/10/88
09	CA0056359	THOUSAND OAKS, CITY	MINOR	C	04/10/88
09	CA0107409	SAN DIEGO, CITY OF	MAJOR	Y	06/30/88
09	CA0048097	MONTEREY REG. MPCA	MAJOR	C	10/01/88
09	CA0048062	SANTA CRUZ, CITY OF	MINOR	C	01/01/89
09	CA0048101	SALINAS, CITY OF	MINOR	Y	02/01/89
09	CA0055221	SIMI VALLEY CNTY SD	MAJOR	Y	02/10/89
09	CA0053651	SAN BUENAVENTURA	MAJOR	Y	03/10/89
09	CA0048143	SANTA BARBARA MTP	MAJOR	Y	05/10/89
09	CA0037737	NO. SAN MATEO CNTY	MAJOR	Y	06/20/89
09	CA0030610	SAN FRANCISCO C & C	MAJOR	C	06/20/89
09	CA0037672	SAN FRANCISCO C & C	MAJOR	C	07/10/89
09	CA0053597	CAHARILLO S.D. M.R.P	MAJOR	Y	08/10/89
09	CA0053619	L.A. CNTY SAN. DIST.	MAJOR	C	08/10/89
09	CA0053710	L.A. CNTY SAN. DIST.	MAJOR	C	08/10/89
09	CA0053961	OJAZ VALLEY SANITARY DISTRICT	MAJOR	Y	08/10/89
09	CA0054011	L.A. CNTY SAN. DIST.	MAJOR	C	08/10/89
09	CA0054119	L.A. CNTY SAN. DIST.	MAJOR	C	08/10/89
09	CA0054216	L.A. CNTY SAN. DIST.	MAJOR	C	08/10/89
09	CA0054313	L.A. CNTY SAN. DIST.	MAJOR	C	08/10/89
09	CA0056014	LAS VIRGENES MUNI.	MAJOR	Y	08/10/89
09	CA0079260	YUBA CITY	MAJOR	Y	09/01/89

C = COVERED UNDER AN APPROVED PRETREAT. PROGRAM
R = REQUIRED PRETREAT. PROGRAM NOT YET IN PLACE
Y = AN APPROVED PRETREATMENT PROGRAM IS IN PLACE

09/27/89

**PRETREATMENT POTN'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90**

QL *****

REGN	NPID	PNMS	MAOI	PRET	PERE
09	CA0037702	EDMUD	MAJOR	Y	09/19/89
09	CA0037711	SEWERAGE AGCY OF SOUTHRN MARIN	MAJOR	Y	09/19/89
09	CA0078940	TURLOCK, CITY OF	MAJOR	Y	09/30/89
09	CA0000018	SAN BERNARDINO, CITY	MINOR	C	10/01/89
09	CA0037541	SAN MATEO, CITY OF	MAJOR	Y	10/17/89
09	CA0037640	CENTRAL CONTRA COSTA	MAJOR	Y	10/17/89
09	CA0037753	MARIN CO. S.D. NO.5	MAJOR	C	10/17/89
09	CA0077691	VACAVILLE, CITY OF	MAJOR	Y	11/01/89
09	CA0078794	SACRAMENTO, CNTY OF	MINOR	C	11/01/89
09	CA0107395	ENCINA WPCF	MAJOR	Y	12/23/89
09	CA0079171	WEST SACRAMENTO	MAJOR	Y	01/01/90
09	CA0105287	CHINO BASIN M.H.D.	MAJOR	C	01/01/90
09	CA0055531	BURBANK, CITY OF PHD	MAJOR	Y	01/10/90
09	CA0030310	SAN FRANCISCO C & C	MAJOR	C	01/16/90
09	CA0040127	LOHPOC, CITY OF	MAJOR	Y	02/01/90
09	CA0049224	SAN LUIS OBISPO	MAJOR	Y	02/01/90
09	CA0037010	PETALUMA, CITY OF	MAJOR	Y	02/20/90
09	CA0110604	ORANGE CNTY S.D. #2	MAJOR	Y	02/21/90
09	CA0079189	VISALIA, CITY OF MCP	MAJOR	Y	03/01/90
09	CA0102709	SOUTH TAHOE P.U.D.	MAJOR	Y	03/15/90
09	CA0037950	NOVATO SAN. DIST.	MAJOR	Y	04/20/90
09	CA0107611	ALISO WATER MGMT ASY	MAJOR	Y	04/22/90
09	CA0105392	SAN BERNARDINO, CITY	MAJOR	Y	05/01/90
09	CA0030024	FAIRFIELD, CITY OF	MAJOR	Y	05/15/90
09	CA0056227	LOS ANGELES, CITY OF	MAJOR	C	06/10/90
09	CA0037780	BURLINGAME CITY OF	MAJOR	Y	06/19/90
09	CA0022764	SANTA ROSA, CITY OF	MAJOR	Y	07/01/90
09	CA0059021	VENTURA R.C.S.D.	MINOR	Y	07/10/90
09	CA0079134	TRACY, CITY OF	MAJOR	Y	08/01/90
09	CA0077602	SACRAMENTO, CNTY OF	MAJOR	Y	09/01/90
09	CA0079472	NEWMAN, CITY OF	MAJOR	Y	09/01/90
09	CA0040160	GOLETA SAN. DIST.	MAJOR	Y	09/04/90
09	CA0079049	DAVIS, CITY OF	MAJOR	Y	10/01/90
09	CA0105279	CHINO BASIN M.H.D.	MAJOR	Y	10/01/90
08	C00026471	LONGMONT-CITY OF-UTIL DEPT	MAJOR	Y	06/30/87
08	C00032999	ENGLEWOOD & LITTLETON-CITIES O	MAJOR	Y	06/30/88
08	C00036787	NORTHGLENN CITY OF	MAJOR	Y	09/30/88
08	C00026701	LOVELAND- CITY OF	MAJOR	Y	03/31/89
08	C00026739	COLORADO SPRINGS- CITY (ACTVD SLUD	MAJOR	Y	06/30/89
08	C00026425	FT. COLLINS- CITY OF	MAJOR	Y	09/30/89
08	C00040250	GREELEY, CITY OF	MAJOR	Y	09/30/89
08	C00020737	SO FT COLLINS SANIT DIST	MAJOR	Y	03/31/90
03	DE0020249	BRIDGEVILLE STP	MAJOR	Y	01/23/89
03	DE0020320	WILMINGTON, CITY OF WILMINGTON	MAJOR	Y	09/19/90
04	FL0040771	SARASOTA - WHITAKER BAYOU	MAJOR	C	
04	FL0024791	SARASOTA MTP	MAJOR	Y	07/01/80
04	FL0020451	PANAMA CITY-ST ANDREWS STP	MAJOR	Y	04/30/89

09/27/89

PRETREATMENT POTN'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90

QL *****

REGN	NPIS	FMS	MAJZ	PRET	PERE
04	FL0021369	BRADENTON WTP	MAJOR	Y	06/30/89
04	FL0026480	JAX DISTRICT II STP # 2	MAJOR	C	09/30/89
04	FL0028061	HILLSBOROUGH CO-SOUTHWEST WTP	MAJOR	Y	09/30/89
04	FL0026331	BAY COUNTY WASTE TRTMT-PANAMA	MAJOR	R	10/31/89
04	FL0020206	PORT ST. JOE	MAJOR	R	10/31/89
04	FL0027251	GAINESVILLE-MAIN ST WTP 1&2	MAJOR	Y	10/31/89
04	FL0026258	HOLLYWOOD WTP	MAJOR	Y	09/30/90
04	FL0031771	BROWARD CO-NO RES PLT-WWTP	MAJOR	Y	09/30/90
04	FL0039772	LAKELAND STP	MAJOR	Y	09/30/90
04	GA0032492	CHATSWORTH WPCP	MAJOR	Y	01/14/90
04	GA0021814	TOCCOA-EASTANDOLLEE CR WPCP	MAJOR	Y	07/30/90
04	GA0025348	SAVANNAH PRESIDENT ST. WPCP	MAJOR	Y	07/30/90
04	GA0031101	WASHINGTON WPCP	MAJOR	Y	09/19/90
09	HI0020036	HONOLULU, C & C OF	MINOR	C	08/31/82
09	HI0020141	HONOLULU, C & C OF	MAJOR	C	01/31/87
09	HI0020150	HONOLULU, C & C OF	MAJOR	C	01/31/87
09	HI0020117	HONOLULU, C & C OF	MAJOR	Y	04/30/88
07	IA0030620	ANKENY CITY OF (EAST) STP	MAJOR	Y	04/30/87
07	IA0044130	DES MOINES CITY OF STP	MAJOR	Y	06/30/87
07	IA0023434	MUSCATINE CITY OF STP	MAJOR	Y	03/01/89
07	IA0036633	CEDAR FALLS CITY OF STP	MAJOR	Y	07/31/89
07	IA0027219	FORT MADISON CITY OF STP	MAJOR	Y	09/03/90
10	ID0020753	AMERICAN FALLS, CITY OF	MINOR	Y	12/03/86
10	ID0023817	REXBURG, CITY OF	MAJOR	Y	12/19/89
10	ID0021261	IDAHO FALLS, CITY OF	MAJOR	Y	06/08/90
10	ID0022063	NAHPA, CITY OF	MAJOR	Y	06/26/90
10	ID0020099	BURLEY, CITY OF	MAJOR	Y	09/30/90
05	IL0020390	DUPAGE COUNTY-NORDIC SW8 TRMT	MINOR	C	10/01/79
05	IL0020321	DECATUR S.D.-MAIN	MAJOR	Y	04/30/88
05	IL0036308	PEORIA, CITY OF	MINOR	C	03/01/89
05	IL0033812	ADDISON-NORTH	MAJOR	Y	04/01/89
05	IL0036302	ROCK ISLAND, CITY OF	MAJOR	C	07/01/89
05	IL0027201	ROCKFORD SANITARY DISTRICT	MAJOR	Y	07/31/89
05	IL0027367	ADDISON-SOUTH	MAJOR	C	12/01/89
05	IL0027723	THORN CREEK BASIN SAN DIS	MAJOR	Y	01/01/90
05	IL0035092	NSSD-GURNEE	MAJOR	C	01/01/90
05	IL0021073	BELLEVILLE, VILLAGE OF	MAJOR	Y	03/01/90
05	IL0020007	GENEVA, CITY OF	MAJOR	Y	04/01/90
05	IL0023022	DEKALB S.D. MAIN STP	MAJOR	Y	04/01/90
05	IL0026352	CAROL STREAM, VILLAGE OF	MAJOR	Y	04/01/90
05	IL0029105	HERRIN, CITY OF	MAJOR	Y	04/01/90
05	IL0020010	AURORA SAN DIST STP	MAJOR	Y	06/01/90
05	IL0023469	WEST CHICAGO STP	MAJOR	Y	06/01/90
05	IL0033481	GRANITE CITY	MAJOR	Y	06/01/90
05	IL0030244	NSSD-WALKEGAN	MAJOR	C	07/01/90
05	IL0031356	TAYLORVILLE SAN DIS	MAJOR	Y	07/01/90
05	IL0036340	MROGC - EGAN	MAJOR	C	07/01/90

09/27/89

PRETREATMENT POTM'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90

QL *****

REGN	NPID	PNMS	MADI	PRET	PERE
05	IL0021407	SAUGET, VILLAGE OF	MAJOR	Y	07/31/90
05	IL0045148	SAUGET, VILLAGE OF	MAJOR	C	07/31/90
05	IL0021971	SPRINGFIELD SANITARY DIST-SU	MAJOR	Y	08/01/90
05	IL0030171	NSSD-CLAVEY ROAD	MAJOR	Y	09/01/90
05	IL0053457	CRYSTAL LAKE STP #3	MINOR	C	10/01/90
05	IN0023752	MICHIGAN CITY WASTEWATER PLANT	MAJOR	Y	08/31/89
05	IN0025753	GOSHEN MUNICIPAL STP	MAJOR	Y	08/31/89
05	IN0023884	NEW ALBANY MUNICIPAL STP	MAJOR	Y	09/30/89
05	IN0025474	ELKHART MUNICIPAL STP	MAJOR	Y	11/30/89
05	IN0025666	MADISON MUNICIPAL STP	MAJOR	Y	12/31/89
05	IN0031020	VINCENNES MUNICIPAL STP	MAJOR	Y	12/31/89
05	IN0032191	FORT WAYNE MUNICIPAL STP	MAJOR	Y	01/31/90
05	IN0020991	PLYMOUTH MUNICIPAL STP	MAJOR	Y	02/28/90
05	IN0022934	FRANKFORT MUNICIPAL STP	MAJOR	Y	02/28/90
05	IN0023914	NEW CASTLE MUNICIPAL STP	MAJOR	Y	02/28/90
05	IN0024660	VALPARAISO MUNICIPAL STP	MAJOR	Y	02/28/90
05	IN0024741	HABASH MUNICIPAL STP	MAJOR	Y	02/28/90
05	IN0020427	BREMEN	MAJOR	Y	04/30/90
05	IN0032336	CONNERSVILLE MUNICIPAL STP	MAJOR	Y	04/30/90
05	IN0032468	LAFAYETTE MUNICIPAL STP	MAJOR	Y	06/30/90
05	IN0020451	NORTH VERNON MUNICIPAL STP	MAJOR	Y	07/31/90
05	IN0024392	PRINCETON MUNICIPAL STP	MAJOR	Y	07/31/90
05	IN0032573	COLUMBUS MUNICIPAL STP	MAJOR	Y	07/31/90
05	IN0032956	EVANSVILLE STP--WESTSIDE	MAJOR	Y	07/31/90
05	IN0020636	KENDALLVILLE MUNICIPAL STP	MAJOR	Y	08/31/90
05	IN0023183	INDIANAPOLIS-BELMONT MUN. STP	MAJOR	Y	08/31/90
07	KY0042625	INDEPENDENCE CITY OF INTP	MAJOR	Y	07/09/90
04	KY0042995	JAMESTOWN STP	MAJOR	Y	08/13/87
04	KY0022411	MORRIS FARM STP	MAJOR	Y	11/18/87
04	KY0041098	HORSE CAVE WATER & SEWER	MINOR	Y	04/12/88
04	KY0021466	CAMPBELL/KENTON S/D #1-DRY CR	MAJOR	Y	10/12/89
04	KY0022861	FRANKFORT MUNICIPAL SEWER BD	MAJOR	Y	10/12/89
04	KY0073372	OWENSBORO STP (EAST)	MAJOR	C	10/23/89
04	KY0020093	OWENSBORO STP (WEST)	MAJOR	Y	10/24/89
04	KY0021504	LEXINGTON-WEST HICKMAN STP	MAJOR	C	10/24/89
04	KY0025194	JEFFERSONTOWN STP	MAJOR	Y	10/26/89
04	KY0022942	MADISONVILLE STP	MAJOR	Y	05/23/90
04	KY0020133	CORBIN STP	MAJOR	Y	05/31/90
04	KY0022420	HITE CREEK STP	MAJOR	C	07/06/90
04	KY0077801	SOUTHERN CAMPBELL CO IND PARK	MINOR	Y	08/07/90
04	KY0020130	GEORGETOWN STP	MAJOR	Y	09/28/90
06	LA0042188	SHREVEPORT, CITY OF (N HIGHLAN	MAJOR	C	11/06/89
06	LA0041394	SHREVEPORT CITY OF (LUCAS)	MAJOR	Y	01/10/90
06	LA0041009	ALEXANDRIA, CITY OF (HUDSON BL	MAJOR	Y	08/30/90
06	LA0041254	CROWLEY, CITY OF	MAJOR	Y	08/30/90
06	LA0038741	MONROE, CITY OF (MPC CNTR)	MAJOR	Y	09/27/90
01	MA0100382	FALL RIVER STP	MAJOR	Y	04/01/88

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**PRETREATMENT POTW'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90**

QL *****

REGN	NPID	PWID	MAJ	PRET	PERE
01	MA0100009	GREATER LAWRENCE SD	MAJOR	Y	08/02/88
01	MA0100035	ATTLEBORO STP	MAJOR	Y	08/06/88
01	MA0101005	PITTSFIELD SEWER COMMISSION	MAJOR	Y	03/02/89
01	MA0101010	MILLERS FALLS VILLAGE	MAJOR	Y	03/10/89
01	MA0100510	HOOSAC WPCP	MAJOR	Y	06/27/89
01	MA0101010	BROCKTON	MAJOR	R	07/16/89
01	MA0101681	HAVERHILL WPAF	MAJOR	Y	10/02/89
01	MA0101648	SOUTH DEERFIELD	MAJOR	Y	10/31/89
01	MA0100633	LOWELL MSS	MAJOR	R	11/01/89
01	MA0101168	PALMER	MAJOR	Y	01/24/90
01	MA0100137	MONTAGUE	MAJOR	Y	02/19/90
01	MA0101748	AMESBURY	MAJOR	Y	03/29/90
01	MA0100809	WARE WPCP	MAJOR	Y	04/06/90
01	MA0101478	EASTHAMPTON WTP	MAJOR	Y	06/18/90
01	MA0101800	WESTFIELD WPCP	MAJOR	Y	06/21/90
01	MA0100625	GLoucester	MAJOR	Y	06/26/90
01	MA0101201	WEST FITCHBURG WTP	MAJOR	C	07/16/90
01	MA0101810	NORTHAMPTON MUNI TREAT PLANT	MAJOR	Y	08/07/90
01	MA0100455	SOUTH HADLEY WTP	MAJOR	Y	08/29/90
01	MA0101808	CHICOPEE	MAJOR	Y	08/29/90
01	MA0101638	HOLYOKE MUNI TREAT PLANT	MAJOR	Y	08/29/90
01	MA0101824	GREAT BARRINGTON	MAJOR	Y	09/09/90
01	MA0101052	ERVING (T)	MAJOR	R	09/26/90
01	MA0101613	SPRINGFIELD-BONDZ ISLAND STP	MAJOR	Y	09/29/90
01	MA0100906	FITCHBURG, EAST WTP	MAJOR	Y	09/30/90
01	MA0102369	UPPER BLACKSTONE WPAF	MAJOR	Y	09/30/90
03	MD0020800	POINT OF ROCKS FREDERICK CO. D	MINOR	C	04/01/79
03	MD0023132	MARYLAND CITY WASTEWATER TREAT	MINOR	C	11/15/79
03	MD0022535	JOPPATONNE STP.-MD ENV.SERVICE	MINOR	C	03/31/80
03	MD0021733	WASHINGTON SUBURBAN SAN. COMM.	MINOR	C	06/30/87
03	MD0020174	DEPT OF PUBLIC WORKS-LITTLE PA	MAJOR	Y	12/31/87
03	MD0021644	BROADNECK WRP	MAJOR	Y	04/30/89
03	MD0020729	NEW MARKET SEWER SYSTEM	MINOR	C	08/31/89
03	MD0021535	MAYOR/CITY COUN BACK RIV WMTF	MAJOR	Y	04/30/89
03	MD0020681	ELKTON SENIORS TREATMENT PLANT	MAJOR	Y	02/28/90
03	MD0021610	FREDERICK CITY WMTF	MAJOR	Y	03/31/90
03	MD0021571	SALISBURY CITY WASTEWATER TRTH	MAJOR	Y	04/30/90
03	MD0021790	HAYRE DE GRACE WMTF TREAT PLT	MAJOR	Y	04/30/90
03	MD0021045	CHARLES CNTY SAN DIST MATTANOM	MAJOR	R	08/18/90
03	MD0021590	CUMBERLAND STP	MAJOR	Y	09/30/90
01	ME0101445	HARTLAND POLLUTION CONTROL FAC	MAJOR	Y	04/29/89
01	ME0100137	CAMDEN TOWN OF	MAJOR	Y	12/26/89
01	ME0100040	BIDDEFORD WMTF	MAJOR	Y	12/27/89
01	ME0100072	BREMER CITY OF	MAJOR	Y	12/31/89
01	ME0100633	SOUTH PORTLAND CITY OF	MAJOR	Y	02/11/90
01	ME0101470	LEXISTON AUBURN WPCA	MAJOR	Y	02/22/90
01	ME0100854	KENNEBEC SANITARY DISTRICT	MAJOR	Y	02/28/90

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**PRETREATMENT POTW'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90**

01 *****

REGN	NPID	FNMS	MAJZ	PRET	PERE
01	ME0100013	AUGUSTA SANITARY DISTRICT	MAJOR	Y	03/29/90
01	ME0100075	PORTLAND WATER DISTRICT	MAJOR	Y	03/29/90
01	ME0100098	ROCKLAND CITY OF	MINOR	Y	03/28/90
01	ME0100307	LISBON TOWN OF	MAJOR	Y	06/27/90
01	ME0100046	WESTBROOK WMTF	MINOR	Y	08/28/90
05	MI0020443	EVART WMTF	MINOR	Y	06/30/83
05	MI0020672	HARBOR BEACH WMTF	MINOR	Y	11/30/87
05	MI0023647	MT CLEMENS WMTF	MAJOR	Y	04/30/88
05	MI0022802	DETROIT WMTF	MAJOR	Y	07/31/88
05	MI0024139	STANDISH WWSL	MINOR	Y	07/31/88
05	MI0020737	CHELSEA WMTF	MINOR	Y	09/30/88
05	MI0023604	MILFORD WMTF	MINOR	Y	12/31/88
05	MI0023931	ROCHESTER WMTF	MAJOR	Y	12/31/88
05	MI0024344	OAKLAND CO DFW-WIXOM WMTF	MAJOR	Y	12/31/88
05	MI0020478	SPARTA WMTF	MINOR	Y	01/31/89
05	MI0020342	MANISTEE WMTF	MINOR	Y	06/30/89
05	MI0021571	MILAN WMTF	MINOR	Y	06/30/89
05	MI0023108	HOLLAND WMTF	MAJOR	Y	07/31/89
05	MI0024023	SALINE WMTF	MAJOR	Y	07/31/89
05	MI0022152	ADRIAN AREA WMTF	MAJOR	Y	08/31/89
05	MI0023001	GLADWIN WMTF	MINOR	Y	08/31/89
05	MI0023256	JACKSON WMTF	MAJOR	Y	08/31/89
05	MI0023299	KALAMAZOO WMTF	MAJOR	Y	08/31/89
05	MI0025577	SAGINAW WMTF	MAJOR	Y	08/31/89
05	MI0020494	PLAINFIELD WMTF	MINOR	Y	09/30/89
05	MI0021000	SOUTHERN CLINTON CO WMTF	MAJOR	Y	09/30/89
05	MI0022276	BATTLE CREEK WMTF	MAJOR	Y	09/30/89
05	MI0023302	MIDLAND WMTF	MAJOR	Y	09/30/89
05	MI0023744	OTSEGO WMTF	MINOR	Y	09/30/89
05	MI0024298	HARREN WMTF	MAJOR	Y	09/30/89
05	MI0029173	MUSKEGON CO WHITEHALL WMTF	MAJOR	Y	09/30/89
05	MI0020311	LOWELL WMTF	MAJOR	Y	10/01/89
05	MI0020397	GREENVILLE WMTF	MAJOR	Y	10/01/89
05	MI0020460	CAPEER WMTF	MAJOR	Y	10/01/89
05	MI0020503	TECUMSEH WMTF	MAJOR	Y	10/01/89
05	MI0020881	SELDING WMTF	MAJOR	Y	10/01/89
05	MI0027401	TRAVERSE CITY WMTF	MAJOR	Y	10/01/89
05	MI0020320	SOUTH HAVEN WMTF	MAJOR	Y	10/31/89
05	MI0020401	MONROE METRO WMTF	MAJOR	Y	10/31/89
05	MI0020036	REED CITY WMTF	MINOR	Y	11/30/89
05	MI0020401	DUNDEE WMTF	MINOR	Y	11/30/89
05	MI0021156	WAYNE CO-WYANDOTTE WMTF	MAJOR	Y	11/30/89
05	MI0022161	ALBION WMTF	MAJOR	Y	01/31/90
05	MI0023707	PETOSKEY WMTF	MINOR	Y	01/31/90
05	MI0020575	HASTINGS WMTF	MAJOR	Y	02/28/90
05	MI0020435	MASON WMTF	MINOR	Y	03/31/90
05	MI0023540	MARSHALL WMTF	MAJOR	Y	03/31/90

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PRETREATMENT POTW'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90

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REGN	NPID	FNMS	MADI	PRET	PERE
05	MI0023901	ZILWALKEE-CARROLLTON TWP WMTF	MAJOR	Y	03/31/90
05	MI0020606	MARYSVILLE WMTF	MAJOR	Y	05/31/90
05	MI0020708	CHARLOTTE WMTF	MINOR	Y	05/31/90
05	MI0021041	IONIA WMTF	MAJOR	Y	05/31/90
05	MI0021474	BOYNE CITY WMTF	MINOR	Y	06/30/90
05	MI0025431	MENOMINEE WMTF	MAJOR	Y	06/30/90
05	MI0022233	AU GRES WMSL	MINOR	Y	07/31/90
05	MI0023973	SAGINAW TWP WMTF	MAJOR	Y	07/31/90
05	MI0020601	MORENCI WMSL	MINOR	Y	08/31/90
05	MI0021679	ROMEO WMTF	MINOR	Y	09/30/90
05	MI0024252	VASSAR WMTF	MINOR	Y	09/30/90
05	MI0021245	GRAND HAVEN-SPRING LAKE WMTF	MAJOR	Y	10/01/90
05	MI0028910	ESSEXVILLE WMTF	MINOR	Y	10/01/90
05	MI0023027	GRANDVILLE WMTF	MAJOR	Y	10/01/90
05	MI0023025	PONTIAC WMTF	MAJOR	Y	10/01/90
05	MI0024392	WYOMING WMTF	MAJOR	Y	10/01/90
05	MI0026069	GRAND RAPIDS WMTF	MAJOR	Y	10/01/90
05	MI0024339	WEST BAY CO REGIONAL WMTF	MAJOR	Y	10/01/90
05	MI0042701	KALAMAZOO LAKE HAT & SA WMTF	MINOR	Y	10/01/90
05	MN0029015	MWCC/MC-METROPOLITAN	MAJOR	Y	06/30/87
05	MN0024619	ROCHESTER	MAJOR	Y	12/31/88
05	MN0051204	OMATONNA	MAJOR	Y	06/30/89
05	MN0049704	WESTERN LAKE SSO	MAJOR	Y	10/31/89
05	MN0029912	MWCC/MC-BAYPORT	MINOR	C	03/31/90
05	MN0029921	MWCC/MC-ANDOKA	MAJOR	C	03/31/90
05	MN0029963	MWCC/MC-CHASKA	MAJOR	C	06/30/90
05	MN0030147	WINONA	MAJOR	Y	06/30/90
05	MN0048045	MWCC/MC-EMPIRE	MAJOR	Y	06/30/90
05	MN0029990	MWCC/MC-STILLWATER	MAJOR	C	07/31/90
05	MN0030015	MWCC/MC-SAVAGE	MINOR	C	09/30/90
07	MO0024903	KC, PLATTE COUNTY	MINOR	C	11/08/84
07	MO0039136	CARTHAGE	MAJOR	Y	01/01/88
07	MO0040043	MARSHFIELD	MAJOR	Y	01/01/88
07	MO0004352	KSO, KERAHEC BOTTOMS	MINOR	C	02/03/88
07	MO0022301	MT. VERNON	MAJOR	Y	08/18/88
07	MO0004393	HARRISBURG M.	MINOR	C	04/26/89
07	MO0032003	MARSHALL	MAJOR	Y	06/21/89
07	MO0040321	MACON (W)	MINOR	C	06/21/89
07	MO0009601	INDEPENDENCE CITY OF ROCK	MAJOR	Y	07/05/89
07	MO0000443	KSO, BAUPHANTNER	MAJOR	C	08/30/89
07	MO0020077	KSO-EARTH CITY WMTF	MINOR	C	09/05/89
07	MO0020019	MOBERLY M.	MINOR	C	09/13/89
07	MO0039740	TRENTON	MAJOR	Y	10/11/89
07	MO0097037	COLUMBIA, HINKSON PERCHE	MAJOR	Y	10/11/89
07	MO0040313	KC, FISHING R.	MINOR	C	10/25/89
07	MO0024961	KC, TODD CR.	MAJOR	C	11/08/89
07	MO0042579	CASSVILLE	MINOR	Y	11/08/89

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PRETREATMENT POTM'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90

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REGN	NPID	PNMS	MADI	PRET	PERE
07	MO0040730	BOONVILLE	MAJOR	Y	11/22/89
07	MO0050379	MONROE CITY	MINOR	Y	11/22/89
07	MO0049808	SPRINGFIELD SM.	MAJOR	Y	12/06/89
07	MO0093899	WENTZVILLE	MAJOR	Y	12/09/89
07	MO0099468	ST. CLAIR	MINOR	Y	12/09/89
07	MO0101087	LBVSO, L BLUE R.	MAJOR	Y	12/20/89
07	MO0103349	TURKEY CREEK	MAJOR	Y	12/20/89
07	MO0025003	KANSAS CITY IND. PARK	MINOR	C	12/22/89
07	MO0040509	CAMDENTON 82	MINOR	C	02/28/90
07	MO0040593	CAMDENTON 84	MINOR	C	02/28/90
07	MO0040607	CAMDENTON 85	MINOR	C	02/28/90
07	MO0023081	ST. JOSEPH AIRPORT	MINOR	C	03/28/90
07	MO0050381	ST. CHARLES, MO. R.	MAJOR	Y	03/31/90
07	MO0020709	CENTRALIA	MINOR	Y	04/25/90
07	MO0036757	ALMORA	MAJOR	Y	05/09/90
07	MO0056154	CAPE GIRARDEAU	MINOR	C	05/09/90
07	MO0049506	KIRKSVILLE	MAJOR	Y	06/20/90
07	MO0094046	JEFFERSON CITY	MAJOR	Y	06/20/90
07	MO0040569	CAMDENTON 81	MINOR	C	06/15/90
07	MO0049531	KC, BIRMINGHAM	MAJOR	C	06/29/90
07	MO0050500	CAPE GIRARDEAU	MAJOR	Y	09/05/90
07	MO0023043	ST. JOSEPH	MAJOR	Y	09/19/90
07	MO0023027	SEDALIA NORTH	MAJOR	Y	09/26/90
04	NC0020708	MALLACE WMTF, TOWN OF	MINOR	Y	03/31/83
04	NC0020640	WASHINGTON WMTF, TOWN OF	MAJOR	Y	02/29/80
04	NC0020712	HOOKERTON WMTF, TOWN OF	MINOR	Y	07/31/80
04	NC0057011	ORIENTAL WMTF	MINOR	Y	10/31/80
04	NC0023286	CAROLINA BEACH WMTF, TOWN OF	MAJOR	Y	01/21/89
04	NC0021010	CLARKTON WMTF, TOWN OF	MINOR	Y	01/31/89
04	NC0057606	STANTONSBURG WMTF, TOWN OF	MINOR	Y	01/31/89
04	NC0020490	LINCOLNTON WMTF, TOWN OF	MAJOR	Y	02/28/89
04	NC0020589	HENDERSON NUTBURN CREEK WMTF	MAJOR	Y	03/31/89
04	NC0021423	SPRUCE PINE WMTF, TOWN OF	MINOR	Y	03/31/89
04	NC0024220	HIGH POINT, WEST SIDE WMTF	MAJOR	Y	03/31/89
04	NC0020330	DURHAM (END WMTF)	MAJOR	Y	03/31/89
04	NC0044440	CHERRYVILLE WMTF, TOWN OF	MAJOR	Y	03/31/89
04	NC0057151	MARS HILL WMTF, TOWN OF	MINOR	Y	03/31/89
04	NC0020290	BURNSVILLE WMTF, TOWN OF	MINOR	Y	04/30/89
04	NC0020401	HICKORY NORTHEAST WMTF	MAJOR	Y	04/30/89
04	NC0020881	CARTHAGE WMTF, TOWN OF	MINOR	Y	04/30/89
04	NC0031079	MARION CORPENING CREEK WMTF	MAJOR	Y	04/30/89
04	NC0024970	CITY OF CHARLOTTE-MCALPINE	MAJOR	Y	05/31/89
04	NC0035066	CHATHAM COUNTY-BYNUM WMTF	MINOR	Y	05/31/89
04	NC0050342	WINSTON-SALEM (LOWER MUDDY CK)	MAJOR	Y	05/31/89
04	NC0023264	CONOVER WMTF-FAIRGROVE	MINOR	Y	06/30/89
04	NC0024112	THOMASVILLE WMTF, TOWN OF	MAJOR	Y	06/30/89
04	NC0026000	TABOR CITY WMTF, TOWN OF	MAJOR	Y	06/30/89

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**PRETREATMENT POTH'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90**

QL *****

REGN	NPID	FMS	MAOI	PRET	PERE
04	NC0036869	CONCORD (ROCKY RIVER WMTF)	MAJOR	Y	06/30/89
04	NC0040021	YANCEYVILLE WMTF, TOWN OF	MINOR	Y	06/30/89
04	NC0055700	LEXINGTON REGIONAL WMTF	MAJOR	Y	06/30/89
04	NC0020481	WEST JEFFERSON WMTF, TOWN OF	MINOR	Y	07/31/89
04	NC0021369	COLUMBUS WMTF, TOWN OF	MINOR	Y	07/31/89
04	NC0036668	KENANSVILLE WMTF, TOWN OF	MINOR	Y	07/31/89
04	NC0052469	EASTERN BAND CHEROKEE NEM WMTF	MINOR	Y	08/26/89
04	NC0021334	SOUTHPORT WMTF, TOWN OF	MINOR	Y	08/31/89
04	NC0024333	MONROE WMTF, CITY OF	MAJOR	Y	08/31/89
04	NC0023461	BAKERSVILLE WMTF, TOWN OF	MINOR	Y	08/31/89
04	NC0027103	PEMBROKE WMTF, TOWN OF	MINOR	Y	08/31/89
04	NC0048079	CARY-NORTH WMTF, TOWN OF	MAJOR	Y	08/31/89
04	NC0020891	STATESVILLE-THIRD CRK WMTF	MAJOR	Y	09/30/89
04	NC0025984	FOREST CITY WMTF, (TOWN OF)	MAJOR	Y	09/30/89
04	NC0026689	DENTON WMTF, TOWN OF	MINOR	Y	09/30/89
04	NC0021113	BURGAN WMTF, TOWN OF	MINOR	Y	10/31/89
04	NC0021229	OLD FORT WMTF	MINOR	Y	10/31/89
04	NC0023965	WILMINGTON-NORTHSIDE WMTF	MAJOR	Y	10/31/89
04	NC0023973	WILMINGTON-SOUTHSIDE WMTF	MAJOR	Y	10/31/89
04	NC0024937	CHUD-SUGAR CREEK WMTF	MAJOR	Y	12/31/89
04	NC0020427	ROCKINGHAM WMTF, CITY OF	MAJOR	Y	01/31/90
04	NC0021903	WARSAW WMTF, TOWN OF	MINOR	Y	01/31/90
04	NC0023736	LENOIR-GUNPOWDER CRK WMTF	MAJOR	Y	01/31/90
04	NC0023906	WILSON WMTF, TOWN OF	MAJOR	Y	01/31/90
04	NC0025020	WENDELL WMTF, TOWN OF	MINOR	Y	01/31/90
04	NC0026849	CLAREMONT WMTF-SOUTH	MINOR	Y	01/31/90
04	NC0032662	CLAREMONT WMTF-NORTH	MINOR	Y	01/31/90
04	NC0024949	CHUD-IRWIN CREEK	MAJOR	Y	03/31/90
04	NC0023402	ENFIELD WMTF, TOWN OF	MINOR	Y	03/31/90
04	NC0040534	BREVARD NEM WMTF, CITY OF	MAJOR	Y	03/31/90
04	NC0026751	WINDSOR WMTF, TOWN OF	MAJOR	Y	04/30/90
04	NC0020800	ANDREWS TREATMENT PLANT (TOWN)	MAJOR	Y	05/31/90
04	NC0021768	ROCKWELL - SOUTHSIDE WMTF	MINOR	Y	05/31/90
04	NC0029572	FARMVILLE WMTF, TOWN OF	MAJOR	Y	05/31/90
04	NC0025036	HOT SPRINGS WMTF, TOWN OF	MINOR	Y	06/30/90
04	NC0026051	DURHAM CO TRIANGLE WMTF	MAJOR	Y	06/30/90
04	NC0030716	CENTRAL JOHNSTON COUNTY WMTF	MAJOR	Y	06/30/90
04	NC0020141	BOILING SPRINGS EAST WMTF	MINOR	Y	07/31/90
04	NC0020214	SYLVA WMTF, TOWN OF	MINOR	Y	07/31/90
04	NC0020362	HALSTONBURG WMTF, TOWN OF	MINOR	Y	07/31/90
04	NC0025071	EDEN-MEBANE BRIDGE WMTF	MAJOR	Y	07/31/90
04	NC0026557	BRYSON CITY WMTF, TOWN OF	MINOR	Y	07/31/90
04	NC0063096	HOLLY SPRINGS-UTLEY BRANCH	MINOR	Y	07/31/90
04	NC0020044	WILLIAMSTON WMTF, TOWN OF	MAJOR	Y	08/31/90
01	NH0100668	ROCHESTER	MAJOR	Y	06/11/87
01	NH0100071	EXETER WTP	MAJOR	Y	03/27/89
01	NH0100161	HERRINACK WTP	MAJOR	Y	02/27/90

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**PRETREATMENT POTM'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90**

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REGN	NPID	FNPS	MADI	PRET	PERE
01	NH0100170	NASHUA STP	MAJOR	Y	06/14/90
01	NH0100449	MANCHESTER	MAJOR	Y	06/14/90
01	NH0100333	CONCORD PENACOOK	MAJOR	C	06/19/90
01	NH0100960	WINDSOR-WEBS1	MAJOR	Y	06/19/90
01	NH0100277	SOMERSWORTH WTP	MAJOR	Y	06/21/90
02	NJ0027014	JERSEY CITY STP	MAJOR	C	01/30/82
02	NJ0027022	JERSEY CITY STP	MAJOR	C	01/30/82
02	NJ0020020	BERGEN COUNTY S T P	MAJOR	Y	09/30/85
02	NJ0024606	GLOUCESTER COUNTY UA	MAJOR	Y	08/31/86
02	NJ0026085	HOBOKEN STP	MAJOR	R	10/30/86
02	NJ0035301	STONY BROOK RSA'S	MINOR	C	04/14/89
02	NJ0035319	STONY BROOK RSA'S	MINOR	C	04/14/89
02	NJ0026102	CAMDEN COUNTY MUA	MAJOR	Y	08/20/89
02	NJ0022349	ROCKAWAY VALLEY RES S.A.	MAJOR	Y	09/14/89
02	NJ0024664	SOMERSET RARITAN VALLEY S.A.	MAJOR	Y	02/28/90
02	NJ0026301	HAMILTON TOWNSHIP WTP	MAJOR	Y	04/30/90
02	NJ0020141	MIDDLESEX COUNTY UTILITIES	MAJOR	Y	07/31/90
02	NJ0020923	TRENTON SEWAGE TREATMENT	MAJOR	Y	08/31/90
09	NV0020133	LAS VEGAS, CITY OF	MAJOR	Y	06/30/82
09	NV0021261	CLARK CNTY SD #1	MAJOR	Y	01/16/88
02	NY0026620	GLEN COVE SEWAGE TREATMENT PLA	MAJOR	Y	07/01/87
02	NY0026336	NIAGARA FALLS (C) WASTEWATER T	MAJOR	Y	11/01/87
02	NY0026514	BATAVIA (C) WATER POLLUTION CO	MAJOR	Y	06/01/88
02	NY0027610	NETZEL ROAD	MAJOR	C	06/01/89
02	NY0026441	INWOOD SEWAGE TREATMENT PLANT	MAJOR	C	08/01/89
02	NY0027723	HEADONBROOK-LIMESTONE	MAJOR	C	09/01/89
02	NY0022740	SUFFERN (V) STP	MAJOR	Y	10/01/89
02	NY0024414	BINGHAMTON-JOHNSON CITY JNT SD	MAJOR	Y	12/01/89
02	NY0026497	NEW ROCHELLE S.D.	MAJOR	C	12/01/89
02	NY0026719	BLIND BROOK SD STP	MAJOR	C	12/01/89
02	NY0021610	WEBSTER (T) WATER POLL CTRL FA	MAJOR	Y	05/01/90
02	NY0025960	CANANDAIGUA (C) STP	MAJOR	Y	07/01/90
02	NY0025950	AMHERST SD #16 STP	MAJOR	Y	08/01/90
02	NY0035742	MILTON STREET STP	MAJOR	Y	08/01/90
02	NY0026310	NEWMURGH WATER POLL CONTRL FLT	MAJOR	Y	09/01/90
02	NY0027570	JAMESTOWN (C) WMTF	MAJOR	Y	09/01/90
02	NY0026450	NCS002 BAY PARK WATER POLL CTL	MAJOR	Y	10/01/90
02	NY0026859	NCS003 CEDAR CREEK WATER POLL	MAJOR	C	10/01/90
02	NY0027961	DUNKIRK (C) WMTF	MAJOR	Y	10/01/90
02	NY0028048	GATES-CHILI-ODDEN S.D. WMTF	MAJOR	C	10/01/90
02	NY0028410	BIRD ISLAND WMTF	MAJOR	Y	10/01/90
02	NY0028533	HAVERSTRAW JOINT REGIONAL STP	MAJOR	Y	10/01/90
02	NY0095401	ERIE CO/SOUTHTONNS SEM TRT FAC	MAJOR	Y	10/01/90
05	OH0031062	EUCLID, CITY OF	MAJOR	R	06/30/82
05	OH0028110	HILLARD, CITY OF	MAJOR	Y	05/11/88
05	OH0023388	LOGAN, CITY OF	MAJOR	Y	06/27/88
05	OH0027987	WARREN, CITY OF	MAJOR	Y	07/11/88

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REGN	NPID	PWMS	MAJ	PRET	PERE
05	OH0028816	MASSILLON, CITY OF	MAJOR	Y	09/10/88
05	OH0049361	CLERMONT CO.-NINE MILE CREEK	MINOR	C	04/01/89
05	OH0024929	DELPHOS, CITY OF	MAJOR	Y	08/20/89
05	OH0037249	MAHONING COUNTY - BOARDMAN	MAJOR	Y	08/27/89
05	OH0049387	CLERMONT CO.-LOWER MIDDLE FORK	MAJOR	Y	09/22/89
05	OH0025429	GREENVILLE, CITY OF	MAJOR	Y	10/20/89
05	OH0027952	HAPAKONETA, CITY OF	MAJOR	Y	10/20/89
05	OH0024066	BELLEFONTAINE, CITY OF	MAJOR	Y	10/29/89
05	OH0023833	AKRON, CITY OF	MAJOR	Y	11/25/89
05	OH0026093	LORAIN, CITY OF	MAJOR	Y	11/25/89
05	OH0024778	COSHOCOTON, CITY OF	MAJOR	Y	12/28/89
05	OH0024406	CHILLICOTHE, CITY OF	MAJOR	Y	01/06/90
05	OH0025301	GREENE COUNTY - BEAVERCREEK	MAJOR	Y	02/24/90
05	OH0040892	GREENE COUNTY - SUGARCREEK	MAJOR	C	02/24/90
05	OH0024689	VILLAGE OF NEWCOMERSTOWN	MINOR	Y	03/08/90
05	OH0026727	NEW PHILADELPHIA, CITY OF	MAJOR	Y	03/25/90
05	OH0025138	PINDLAY, CITY OF	MAJOR	Y	04/28/90
05	OH0025278	MIAMI CONSERV. DIST.-FRANKLIN	MAJOR	R	05/05/90
05	OH0026069	LIMA, CITY OF	MAJOR	Y	05/05/90
05	OH0025291	FREMONT, CITY OF	MAJOR	Y	05/10/90
05	OH0024911	DELAWARE, CITY OF	MAJOR	Y	06/03/90
05	OH0024309	CAMBRIDGE, CITY OF	MAJOR	Y	06/07/90
05	OH0028002	WASHINGTON C.H., CITY OF	MAJOR	Y	06/07/90
05	OH0024448	CIRCLEVILLE, CITY OF	MAJOR	Y	06/23/90
05	OH0024732	COLUMBUS, CITY OF-JACKSON PIKE	MAJOR	Y	07/08/90
05	OH0024741	COLUMBUS, CITY OF - SOUTHERLY	MAJOR	C	07/08/90
05	OH0025763	HEATH, CITY OF	MAJOR	R	08/19/90
05	OH0026189	GENEVA, CITY OF	MAJOR	Y	09/09/90
05	OH0026672	BELLEVUE, CITY OF	MAJOR	Y	09/09/90
05	OH0034223	LUCAS CO. - MAUMEE RIVER	MAJOR	Y	09/15/90
05	OH0052914	OREGON, CITY OF	MAJOR	Y	09/15/90
05	OH0024007	BARBERTON, CITY OF	MAJOR	Y	09/16/90
05	OH0024699	DEFIANCE, CITY OF	MAJOR	Y	09/20/90
05	OH0026522	MIDDLETOWN, CITY OF	MAJOR	Y	09/21/90
05	OH0025448	HANDELTON, CITY OF	MAJOR	Y	09/23/90
05	OH0027910	VAN HERT, CITY OF	MAJOR	Y	09/27/90
06	OK0031801	MIAMI, CITY OF (NORTH PLANT)	MINOR	C	08/29/89
06	OK0029131	MUSKOGEE, CITY OF	MAJOR	Y	10/29/89
06	OK0026093	SHAMTEE, CITY OF (MAIN STP)	MAJOR	Y	04/17/90
06	OK0030844	SAND SPRINGS, CITY OF (POLLUTIO	MAJOR	Y	06/24/90
06	OK0026000	SAPULPA, CITY OF (SOUTH STP)	MAJOR	C	07/11/90
06	OK0026069	PONCA CITY, CITY OF	MAJOR	Y	08/08/90
06	OK0026018	CHICKASHA, CITY OF (MA)	MAJOR	Y	08/30/90
10	OR0032352	NEWBERG, CITY OF	MINOR	Y	
10	OR0026263	MEDFORD, CITY OF	MAJOR	Y	04/30/87
10	OR0026301	KLAMATH FALLS, CITY OF	MAJOR	Y	01/31/88
10	OR0026440	LA GRANDE, CITY OF	MAJOR	Y	03/31/88

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REGN	NPID	FMS	MAJ	PRET	PERE
10	OR0026361	CORVALLIS, CITY OF	MAJOR	Y	05/31/88
10	OR0031284	METRO WASTEWATER MANAGEMENT CO	MAJOR	Y	07/31/88
10	OR0031289	TRI-CITY SERVICE DISTRICT	MAJOR	Y	07/31/88
10	OR0026857	NEWBERG, CITY OF	MAJOR	Y	11/30/88
10	OR0026148	OAK LODGE SANITARY DISTRICT	MAJOR	Y	01/31/89
10	OR0020214	CANBY, CITY OF	MINOR	Y	02/28/89
10	OR0026191	MCMINNVILLE, CITY OF	MAJOR	Y	05/31/89
10	OR0026221	CLACKAMAS COUNTY SERVICE DIST	MAJOR	Y	05/31/89
10	OR0031356	ROSEBURG URBAN SANITARY AUTHORITY	MAJOR	Y	05/31/89
10	OR0020168	UNIFIED SEWERAGE AGENCY OF MA	MAJOR	C	07/31/89
10	OR0026905	PORTLAND, CITY OF	MAJOR	C	07/31/89
10	OR0023582	COOS BAY, CITY OF	MAJOR	C	11/30/89
10	OR0023361	NORTH BEND, CITY OF	MAJOR	Y	01/31/90
10	OR0023374	COOS BAY, CITY OF	MAJOR	Y	01/31/90
10	OR0028801	ALBANY, CITY OF	MAJOR	Y	03/31/90
03	PA0025941	CANNONSBURG -HOUSTON STP	MAJOR	Y	07/26/89
03	PA0026492	SCRANTON SEWER AUTH.	MAJOR	Y	11/05/89
03	PA0026727	TYRONE BOROUGH SEWER AUTH-STP	MAJOR	Y	12/13/89
03	PA0026743	LANCASTER SEWER AUTH-STANLEY D	MAJOR	Y	12/20/89
03	PA0027073	LACKAMANNA RIVER BASIN SEWER A	MAJOR	C	01/30/90
03	PA0027065	LACKAMANNA RIVER BASIN SEWER A	MAJOR	Y	01/31/90
03	PA0027081	LACKAMANNA RIVER BASIN SEWER A	MINOR	C	01/31/90
03	PA0027090	LACKAMANNA RIVER BASIN SEWER A	MAJOR	C	01/31/90
03	PA0027189	LOWER ALLEN TOWNSHIP AUTHORITY	MAJOR	Y	02/04/90
03	PA0028976	UPPER MORELAND-HATBORO SEWAGE	MAJOR	Y	02/07/90
03	PA0026877	CARLISLE STP	MAJOR	Y	02/15/90
03	PA0021681	HAMBURG BORO	MAJOR	Y	02/28/90
03	PA0026497	BUTLER AREA SEWER AUTH-MTR POL	MAJOR	Y	03/07/90
03	PA0027049	WILLIAMSPORT SAN AUTH(WEST)	MAJOR	Y	03/18/90
03	PA0027087	WILLIAMSPORT SAN AUTH(CENTRAL)	MAJOR	C	03/18/90
03	PA0027391	UPPER ALLEGHENY STP	MAJOR	R	03/28/90
03	PA0026387	ST. MARYS BOROUGH MUN. AUTH.	MAJOR	Y	03/29/90
03	PA0026123	COLUMBIA WASTEWATER TREATMENT	MAJOR	Y	03/29/90
03	PA0026483	AMBLER WASTE WATER TREATMENT P	MAJOR	Y	03/29/90
03	PA0026049	LATROBE MUNICIPAL AUTHORITY-ST	MAJOR	Y	03/27/90
03	PA0026913	MCKEESPORT STP	MAJOR	Y	03/27/90
03	PA0020125	MONACA BOROUGH MUNICIPAL AUTHORITY	MAJOR	Y	03/28/90
03	PA0026484	DERRY TOWNSHIP MUN. AUTH.	MAJOR	Y	03/29/90
03	PA0026786	POTTSTOWN BORO COUNCIL-MNTR.TR	MAJOR	Y	03/29/90
03	PA0020644	MIDDLETON WASTEWATER TREATMENT	MAJOR	R	04/23/90
03	PA0026816	EAST NORRISTON-PLYMOUTH JOINT S	MAJOR	Y	04/23/90
03	PA0027197	HARRISBURG WATER AND SEWER AUT	MAJOR	Y	04/23/90
03	PA0023831	DANVILLE MUN AUTH	MAJOR	Y	04/29/90
03	PA0025917	CHALFONT NEW BRITAIN JOINT SEW	MAJOR	Y	04/30/90
03	PA0020346	PUNXSUTANEY, MUN. AUTH. OF TH	MAJOR	Y	05/15/90
03	PA0027421	NORRISTOWN BOROUGH WASTEWATER	MAJOR	Y	05/16/90
03	PA0027316	LEBANON CITY AUTHORITY-SEWAGE	MAJOR	Y	05/17/90

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PRETREATMENT POTHS BY REGION
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REGN	NPID	FMS	MAOI	PRET	PERE
03	PA0026557	SUNBURY CITY MUN AUTH	MAJOR	Y	06/03/90
03	PA0026361	LOWER LACKAWANNA VALLEY SAN. A	MAJOR	Y	06/16/90
03	PA0021075	MYERSTOWN BOROUGH	MAJOR	Y	06/24/90
03	PA0027456	GREATER GREENSBURG SEWAGE AUTH	MAJOR	R	06/27/90
03	PA0026034	JOHNSTOWN, CITY OF	MAJOR	Y	06/28/90
03	PA0027111	NEW KENSINGTON CITY MUNICIPAL	MAJOR	Y	06/28/90
03	PA0024759	CURWENSVILLE MUNICIPAL AUTHORITY	MINOR	Y	07/25/90
03	PA0021181	DOYLESTOWN BOROUGH (GREEN ST S	MINOR	C	08/05/90
03	PA0037150	PENN TOWNSHIP SEWAGE TREATMENT	MAJOR	Y	09/11/90
03	PA0026794	CONSHOHOCKEN SEN TREAT. PLT.	MAJOR	Y	09/19/90
03	PA0020446	PENNRIDGE AUTHORITY	MAJOR	R	09/23/90
03	PA0026131	UPPER MERION TWP. AUTH-TROUT R	MAJOR	C	09/23/90
03	PA0070271	MAIDENCREEK TOWNSHIP AUTHORITY	MINOR	Y	09/24/90
03	PA0021580	CATASAUQUA BOROUGH AUTHORITY	MAJOR	Y	09/25/90
03	PA0024180	BERKS MONTGOMERY MUNICIPAL AUT	MAJOR	Y	09/26/90
03	PA0026042	BETHLEHEM AUTHORITY-WASTEWATER	MAJOR	Y	09/27/90
03	PA0026247	HATFIELD TWP. MUN. AUTH.	MAJOR	Y	09/27/90
03	PA0025984	ALLEGHENY COUNTY SAN. AUTH.	MAJOR	Y	09/30/90
03	PA0026000	ALLENTOWN CITY AUTHORITY-WASTE	MAJOR	Y	09/30/90
03	PA0026212	WASHINGTON-EAST WASHINGTON JT.	MAJOR	Y	09/30/90
03	PA0026450	BRISTOL TOWNSHIP	MAJOR	Y	09/30/90
03	PA0027235	EASTON CITY	MAJOR	Y	09/30/90
01	RI0100315	NARRAGANSETT BAY COMMISSION	MAJOR	Y	04/03/84
01	RI0100484	RI PORT AUTHORITY-QUONSET WMTF	MAJOR	Y	01/01/88
01	RI0100072	BLACKSTONE VALLY DISTRICT CORN	MAJOR	Y	11/23/88
01	RI0100005	BRISTOL WMTF	MAJOR	Y	12/27/88
01	RI0100064	WESTERLY WMTF	MAJOR	Y	08/14/90
01	RI0100374	SOUTH KINGSTOWN WMTF	MAJOR	Y	08/23/90
04	SC0023965	WCBSA/FOUNTAIN INN A-FRONTAGE	MINOR	C	05/01/88
04	SC0025178	BENNETTSVILLE TOWN OF	MAJOR	Y	11/30/88
04	SC0021709	GREENWOOD/WILSON CREEK PLANT	MAJOR	Y	02/28/89
04	SC0027707	SUNTER/POCATAHIGO RIVER PLT	MAJOR	Y	04/30/89
04	SC0024481	ORANGEBURG WM TREATMENT PLANT	MAJOR	Y	06/30/89
04	SC0031831	GAFFNEY TOWN OF/THICKETTY CRK	MAJOR	Y	06/30/89
04	SC0023035	EASLEY/GOLDEN CREEK LAGOON	MINOR	C	09/30/89
04	SC0020481	HONEA PATH/CORNER LAGOON	MINOR	Y	10/31/89
04	SC0021172	UNION/TOSCHS CREEK PLANT	MAJOR	C	10/31/89
04	SC0025135	ANDREWS TOWN OF	MAJOR	Y	10/31/89
04	SC0039424	DARLINGTON/WMTF-BLACK CRK	MAJOR	Y	10/31/89
04	SC0021300	LYMAN TOWN OF	MAJOR	Y	12/31/89
04	SC0021539	PAGELAND/SOUTHEAST OX POND	MINOR	Y	12/31/89
04	SC0020472	HONEA PATH/CHICKOLA HILL LAGN	MINOR	C	01/31/90
04	SC0021211	GREAT FALLS TOWN OF	MAJOR	R	01/31/90
04	SC0021461	PICKENS/TOWN CREEK PLANT	MINOR	Y	01/31/90
04	SC0020443	ROCK HILL/MANCHESTER CREEK	MAJOR	Y	03/01/90
04	SC0021601	INDIAN CITY OF	MINOR	Y	04/30/90
04	SC0020249	CHERAM TOWN OF	MAJOR	Y	05/31/90

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REGN	NPID	FNMS	MADI	PRET	PERE
04	SC0025330	ECWASA/BROOKS AVE PLANT	MAJOR	Y	05/31/90
04	SC0025442	ECWASA/TRENTON CITY LAGOON	MINOR	C	06/30/90
04	SC0039453	EASLEY/MIDDLE BRANCH WWT	MAJOR	Y	06/30/90
04	SC0020214	WARE SHOALS/DAIRY STREET PLANT	MAJOR	Y	09/30/90
04	SC0024287	WCRSA/HAULDIN RD PLT	MAJOR	Y	09/30/90
04	SC0039918	ALLENDALE TOWN OF	MAJOR	Y	09/30/90
04	TN0025364	RIPLEY STP	MINOR	Y	04/30/89
04	TN0025411	ADAMSVILLE-LAGOON	MINOR	Y	04/30/89
04	TN0020672	ROGERSVILLE STP	MAJOR	Y	05/31/89
04	TN0021229	GREENEVILLE STP	MAJOR	Y	05/31/89
04	TN0024813	JACKSON U D STP	MAJOR	Y	07/02/89
04	TN0024961	SPRINGFIELD STP	MAJOR	Y	07/02/89
04	TN0021679	BROWNSVILLE STP	MAJOR	Y	07/31/89
04	TN0022888	LEWISBURG STP	MAJOR	Y	07/31/89
04	TN0025437	HARRIMAN STP	MAJOR	Y	08/17/89
04	TN0020516	RED BANK STP	MAJOR	Y	08/24/89
04	TN0020982	COVINGTON STP	MAJOR	Y	09/04/89
04	TN0024244	JOHNSON CITY BRUSH CR. STP	MAJOR	Y	09/23/89
04	TN0024201	ATHENS UTILITIES BOARD	MAJOR	Y	09/28/89
04	TN0023531	BRISTOL STP #2	MAJOR	Y	11/14/89
04	TN0020079	MARYVILLE STP	MAJOR	Y	12/17/89
04	TN0020532	LAFOLLETTE STP	MAJOR	R	12/17/89
04	TN0020541	SHYRNA	MAJOR	Y	12/17/89
04	TN0020656	CLARKSVILLE STP	MAJOR	Y	12/17/89
04	TN0020800	MOUNT PLEASANT STP	MINOR	Y	12/17/89
04	TN0021920	OLD HICKORY U. D.	MAJOR	Y	12/17/89
04	TN0023449	TULLAHOMA STP	MAJOR	Y	12/17/89
04	TN0023477	DYERSBURG STP	MAJOR	Y	12/17/89
04	TN0024188	SHELBYVILLE STP	MAJOR	Y	12/17/89
04	TN0024198	COOKEVILLE STP	MAJOR	Y	12/17/89
04	TN0024996	CROSSVILLE STP	MAJOR	Y	12/17/89
04	TN0025054	PIKEVILLE STP	MINOR	Y	12/17/89
04	TN0021814	FAYETTEVILLE STP	MAJOR	Y	12/30/89
04	TN0023819	LINDEN STP	MINOR	R	12/30/89
04	TN0034585	JASPER STP	MINOR	Y	12/30/89
04	TN0021580	UNION CITY STP	MAJOR	Y	01/30/90
04	TN0026174	HUNTINGDON-BARNETT ST LAGOON	MINOR	Y	02/27/90
04	TN0020141	GALLATIN STP	MAJOR	Y	03/28/90
04	TN0020702	NEWPORT STP	MAJOR	Y	03/28/90
04	TN0021181	HENDERSON LAGOON	MINOR	Y	03/28/90
04	TN0022531	LAURENCEBURG STP	MAJOR	Y	03/28/90
04	TN0023507	MORRISTOWN STP	MAJOR	Y	03/28/90
04	TN0023582	KNOXVILLE- KUMAHEE STP	MAJOR	Y	03/28/90
04	TN0024358	SEVIERVILLE STP	MAJOR	Y	03/28/90
04	TN0026034	HENDERSON-INDUSTRIAL PK LAGOON	MINOR	Y	03/28/90
04	TN0021016	DICKSON-JONES CREEK STP	MINOR	Y	04/29/90
04	TN0021342	ARLINGTON LAGOON #2	MINOR	Y	04/29/90

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REGN	NPID	FNMS	MADI	PRET	PERE
04	TN0021601	SMITHVILLE STP	MINOR	Y	04/29/90
04	TN0025101	LYNCHBURG STP	MINOR	Y	04/29/90
04	TN0036103	COLUMBIA STP	MAJOR	Y	04/29/90
04	TN0024188	OAK RIDGE STP	MAJOR	Y	06/27/90
04	TN0020095	KINGSPORT STP	MAJOR	Y	07/30/90
04	TN0020478	JAYTON STP	MAJOR	Y	07/30/90
04	TN0021687	PULASKI STP	MAJOR	Y	07/30/90
04	TN0026646	KUB - FORKS OF THE RIVER	MAJOR	Y	08/29/90
04	TN0020613	MCKENZIE STP	MAJOR	Y	09/29/90
04	TN0023515	ELIZABETHTON STP	MAJOR	Y	09/29/90
04	TN0025470	NIOTA STP	MINOR	Y	09/29/90
06	TX0009613	SAN ANTONIO, CITY OF (SOUTHWES	MINOR	C	
06	TX00052671	SAN ANTONIO, CITY OF (SAN PEDR	MINOR	C	07/01/77
06	TX0047384	MCKINNEY, CITY OF (NORTHSIDE)	MINOR	C	06/30/79
06	TX0047511	PORT ARTHUR, CITY OF (PORT ACR	MINOR	C	10/20/79
06	TX0025071	BRYAN, CITY OF (STP 80002)	MAJOR	C	03/31/80
06	TX00056723	CORSICANA, CITY OF (STP 80001)	MINOR	C	07/24/84
06	TX00055310	HOUSTON, CITY OF (NORTHGATE UD	MAJOR	C	10/13/87
06	TX0023931	N TEXAS HUD-FLOYDE BRANCH	MAJOR	Y	07/02/89
06	TX0022519	TERRELL, CITY OF (BACHELORS CR	MINOR	C	07/20/89
06	TX0072880	COESSA, CITY OF-EAST WATER REC	MAJOR	C	10/04/89
06	TX0047988	TYLER, CITY OF (SOUTHSIDE)	MAJOR	Y	10/25/89
06	TX0046990	BEAUMONT, CITY OF (HILLEBRANDT	MAJOR	Y	10/29/89
06	TX0062201	HOUSTON, CITY OF (SIMS BAYOU)	MAJOR	C	11/26/89
06	TX0096172	HOUSTON, CITY OF (69TH STREET)	MAJOR	C	11/26/89
06	TX0047261	ENNIS, CITY OF (OAK GROVE)	MAJOR	Y	01/07/90
06	TX0047082	CORPUS CHRISTI, CITY OF (ALLIS	MAJOR	C	01/10/90
06	TX0047104	CORPUS CHRISTI, CITY OF (LAGUN	MAJOR	C	01/10/90
06	TX0047449	MCALLEN, CITY OF	MAJOR	Y	01/10/90
06	TX0022527	TERRELL, CITY OF (KINGS CREEK)	MAJOR	Y	01/22/90
06	TX0047309	GALVESTON, CITY OF (MAIN)	MAJOR	Y	01/22/90
06	TX0063002	HOUSTON, CITY OF (WEST)	MAJOR	C	01/22/90
06	TX0022616	BRYAN, CITY OF (STP 80001)	MAJOR	Y	03/04/90
06	TX0023973	ABILENE, CITY OF	MAJOR	Y	03/04/90
06	TX0024325	SHERMAN, CITY OF	MAJOR	Y	03/04/90
06	TX0023435	PALESTINE, CITY OF (TOWN CREEK	MAJOR	Y	03/04/90
06	TX0047681	TEMPLE, CITY OF (DOHMER STP 8	MAJOR	Y	03/04/90
06	TX0036731	CORSICANA, CITY OF (STP 80002)	MAJOR	Y	03/19/90
06	TX0023779	MINERAL WELLS, CITY OF (FT MAL	MAJOR	Y	03/29/90
06	TX0025470	BRENNAN, CITY OF	MAJOR	Y	03/29/90
06	TX0063011	HOUSTON, CITY OF (NORTHWEST)	MAJOR	C	05/23/90
06	TX0026778	EL PASO, CITY OF (SOCORRO)	MAJOR	C	06/03/90
06	TX0024309	LUFKIN, CITY OF	MAJOR	Y	06/24/90
06	TX0047672	PASADENA, CITY OF (DEERMATER)	MAJOR	Y	06/24/90
06	TX0005895	SULPHUR SPRINGS, CITY OF	MAJOR	Y	06/24/90
06	TX0025194	SENA (OLD VICTORIA STP)	MAJOR	C	07/11/90
06	TX0026123	HOUSTON, CITY OF (PARKSLEN)	MAJOR	C	07/11/90

09/27/89

**PRETREATMENT POTW'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90**

01 *****

REGN	NPID	FMIS	MADI	PRET	PERE
06	TX0027731	HOUSTON, CITY OF (WCID 80090)	MAJOR	C	07/11/90
06	TX0027910	PARIS, CITY OF	MAJOR	Y	07/11/90
06	TX0048307	HOUSTON, CITY OF (BELTWAY CENT	MAJOR	C	07/11/90
06	TX0025100	GBRA (VICTORIA REGIONAL STP)	MAJOR	Y	08/08/90
06	TX0034800	HOUSTON, CITY OF (EASTHAVEN)	MAJOR	C	08/08/90
06	TX0047724	WEATHERFORD, CITY OF	MAJOR	Y	08/08/90
06	TX0047881	PASADENA, CITY OF (GOLDEN ACRE	MAJOR	C	08/08/90
06	TX0063037	HOUSTON, CITY OF (NORTHEAST)	MAJOR	C	08/08/90
06	TX0063410	PASADENA, CITY OF (VINCE BAYOU	MAJOR	C	08/08/90
06	TX0063665	GALVESTON, CITY OF (SEAWOLF)	MINOR	C	08/08/90
06	TX0057347	HOUSTON, CITY OF (WHITE OAK LD	MAJOR	C	08/30/90
06	TX0063045	HOUSTON, CITY OF (WCID 80047)	MAJOR	C	08/30/90
06	TX0063053	HOUSTON, CITY OF (FMWD 80023)	MAJOR	C	08/30/90
06	TX0047201	DENISON, CITY OF (IRON ORE)	MAJOR	Y	09/20/90
08	UT0020974	CENTRAL DAVIS CO SEWER	MAJOR	Y	03/31/89
08	UT0021628	S DAVIS CO SEWER - SOUTH	MAJOR	C	03/31/89
08	UT0020915	OREM CITY CORP	MAJOR	Y	08/30/89
08	UT0024384	SOUTH VALLEY WATER RECLAM FAC	MAJOR	Y	09/30/89
08	UT0023639	TIMPAHOGOS SPECIAL SERVICE DIS	MAJOR	Y	10/31/89
08	UT0020222	MORONI CITY CORP	MAJOR	Y	06/30/90
03	VA0021105	RAPIDAN SERVICE AUTHORITY	MINOR	Y	09/30/81
03	VA0027901	HARRISTON SERVICE CORPORATION	MINOR	C	06/30/82
03	VA0065366	RIVANNA WATER & SEWER AUTH-CRO	MINOR	C	03/31/86
03	VA0064637	AGUSTA COUNTY SERVICE AUTHORITY	MINOR	C	06/30/86
03	VA0025496	RIVANNA AUTH-BRONNSVILLE	MINOR	C	09/30/86
03	VA0025488	RIVANNA AUTH-CAMELOT	MINOR	C	10/28/88
03	VA0024970	LYNCHBURG CITY STP	MAJOR	Y	03/06/89
03	VA0067962	AGUSTA COUNTY SVC AUTH	MINOR	C	03/06/89
03	VA0025437	PETERSBURG WASTEWATER TREATMEN	MAJOR	Y	07/23/89
03	VA0060844	BLACKSBURG-VPI SA-STROUBLES CK	MAJOR	Y	04/14/89
03	VA0062685	PEPPER'S FERRY RGNL WSTMTR TMT	MAJOR	R	09/20/89
03	VA0025291	AUGUSTA CTY.SER.AUTH-FISHERSVZ	MAJOR	R	09/30/89
03	VA0060893	JAMVILLE-NORTH SIDE POLL CONTR	MAJOR	Y	12/31/89
03	VA0060194	CHESTERFIELD COUNTY OF	MAJOR	C	01/29/90
03	VA0025208	HAMPTON RDS.SAN.DIST-ARMY BASE	MAJOR	C	03/21/90
03	VA0025241	HAMPTON RDS.SAN.DIST-JAMES RV.	MAJOR	C	03/21/90
03	VA0025267	HAMPTON RDS.SAN.DIST-WILLIAMSB	MAJOR	C	03/21/90
03	VA0025283	HAMPTON RDS.SAN.DIST-BOAT HARB	MAJOR	C	03/21/90
03	VA0025275	HAMPTON RDS.SAN.DIST-CHESAPEAK	MAJOR	C	03/29/90
03	VA0024986	UPPER OCCOQUAN SEWAGE AUTH-BES	MAJOR	Y	05/08/90
03	VA0025151	MAYNESBORO DEPT OF UTILITIES-S	MAJOR	Y	05/20/90
03	VA0063177	RICHMOND CITY OF	MAJOR	Y	08/27/90
10	WA0037007	TACOMA, CITY OF 01(STP)CENTRL	MAJOR	Y	03/11/90
10	WA0020419	RICHLAND, CITY OF	MAJOR	Y	03/14/90
10	WA0037206	TACOMA, CITY OF 02(STP)WEST	MAJOR	C	06/05/90
10	WA0037214	TACOMA, CITY OF 03(STP)NORTH	MAJOR	C	06/05/90
05	WI0023370	BELOIT SEWER UTILITY	MAJOR	Y	12/31/88

09/27/89

PRETREATMENT POTW'S BY REGION
WITH PERMITS EXPIRING BEFORE 10/01/90

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REGN	NPID	PNMS	MAJ1	PRET	PERE
05	WI0023990	FOND DU LAC WASTEWATER TREATME	MAJOR	Y	03/30/89
05	WI0024401	MANITOWOC CITY	MAJOR	Y	03/31/89
05	WI0025411	SHEBOYGAN CITY	MAJOR	Y	03/31/89
05	WI0029801	LA CROSSE CITY	MAJOR	Y	03/31/89
05	WI0030350	JANESVILLE WATER POLLUTION CON	MAJOR	Y	03/31/89
05	WI0023850	EAU CLAIRE CITY	MAJOR	Y	06/30/89
05	WI0025194	RACINE WATER AND WASTEWATER UT	MAJOR	Y	06/30/89
05	WI0023787	DE PERE CITY	MAJOR	Y	09/30/89
05	WI0025763	WEST BEND, CITY OF	MAJOR	Y	09/30/89
05	WI0026088	NEENAH MENASHA SEWERAGE COMMS	MAJOR	Y	09/30/89
05	WI0031232	HEART OF THE VALLEY METRO SEW	MAJOR	Y	09/30/89
05	WI0025030	OSHKOSH CITY	MAJOR	Y	12/31/89
05	WI0028541	WATERTOWN CITY	MAJOR	Y	03/31/90
05	WI0026819	SOUTH MILWAUKEE WASTEWATER TRE	MAJOR	Y	06/30/90
03	WV0023159	Huntington, City of	MAJOR	Y	08/09/89
03	WV0023213	PARKERSBURG, CITY OF	MAJOR	Y	09/10/89
03	WV0023124	Morgantown, City of	MAJOR	Y	06/05/90
03	WV0023208	CHARLESTON, CITY OF	MAJOR	Y	07/26/90
03	WV0023230	WHEELING, CITY OF	MAJOR	Y	09/03/90
08	WY0022357	ROCK SPRINGS-CITY OF	MAJOR	R	05/31/90

SUB-TOTAL QUICK LOOK PRINT LINES: 772

Attachment 3
All Sludge Incinerators

ALL MUNICIPAL SEWAGE SLUDGE INCINERATORS
 * = NOT REQUIRED TO HAVE A PRETREATMENT PROGRAM
 C = COVERED UNDER AN APPROVED PRETREAT. PROGRAM
 R = REQUIRED PRETREAT. PROGRAM NOT YET IN PLACE
 Y = AN APPROVED PRETREATMENT PROGRAM IS IN PLACE

PERMIT NUMBER	FACILITY NAME SHORT	PRE-TRMT CD	MAJ/MIN	IND	FAC	INACT CD	EXPIRE DATE
CA0102687	LAKE ARROWHEAD S.D.		MINOR			INACTIVE	
MD0022761	MARLBORO MEADOWS SUBDIVISION-F		MINOR			ACTIVE	09/31/92
OR0027375	UNIFIED SEWERAGE AGENCY OF WA		MINOR			INACTIVE	12/31/81
VA0036537	WILLIAMSBURG WFP CITY OF		MINOR			ACTIVE	05/22/85
VA0050032	NEWPORT NEWS WTP-LEE HALL		MINOR			ACTIVE	08/09/90
NC0024538	SHELBY WMTF, CITY OF	Y	MINOR			ACTIVE	10/31/91
NC0030317	ROCKY MOUNT (TAR RIVER WMTF)	Y	MINOR			ACTIVE	09/30/93
AK0021466	WRENSHILL, CITY OF		MAJOR			ACTIVE	10/05/88
CT0101087	STAMFORD STP		MAJOR			ACTIVE	08/28/90
CT0101273	NEW CANAAN STP		MAJOR			ACTIVE	08/28/90
CT0100251	HARTFORD WDC STP		MAJOR			ACTIVE	11/07/90
CT0100641	NAUGATUCK SEWAGE TREATMENT PLA		MAJOR			ACTIVE	11/07/90
CT0100366	NEW HAVEN EAST SHORE STP		MAJOR			ACTIVE	11/12/90
CT0100625	WATERBURY STP		MAJOR			ACTIVE	12/19/90
CT0100307	MATTABASSETT DISTR. COMMISSION		MAJOR			ACTIVE	09/06/91
CT0100382	NEW LONDON/STP		MAJOR			ACTIVE	03/06/91
CT0101249	NORWALK STP		MAJOR			ACTIVE	09/17/92
CT0100609	VERNON WPCF		MAJOR			ACTIVE	01/04/94
GA0021458	ATLANTA- UTOY CREEK WPCF		MAJOR			ACTIVE	06/29/92
HI0020877	HONOLULU, C & C OF		MAJOR			ACTIVE	06/30/90
KS0038547	KANSAS CITY KS 828		MAJOR			ACTIVE	07/02/90
LA0036358	LAKE CHARLES, CITY OF (PLANT B		MAJOR			ACTIVE	09/15/89
LA0036366	LAKE CHARLES, CITY OF (PLANT C		MAJOR			ACTIVE	05/15/89
MD0020044	OCEAN CITY WASTE TREAT PL. WDR		MAJOR			ACTIVE	02/28/90
NE0112818	OMAHA PAPILLION CREEK PLANT		MAJOR			ACTIVE	10/31/93
NH0100346	LEBANON		MAJOR			ACTIVE	02/17/92
NJ0024473	ATLANTIC COUNTY UTILITIES AUTH		MAJOR			ACTIVE	03/31/90
NY0028052	DOUGLAS CO. SEWER		MAJOR			INACTIVE	
NY0026271	ARLINGTON STP		MAJOR			ACTIVE	02/01/90
NY0026778	PORT WASHINGTON WPCF		MAJOR			ACTIVE	04/01/92
CH0024660	NEORSO - WESTERLY		MAJOR			ACTIVE	07/28/92
OH0024651	NEORSO - SOUTHERLY		MAJOR			ACTIVE	09/25/93
PA0026735	SHATARA TWP AUTH-WTR.PULL.CONT		MAJOR			ACTIVE	07/27/89
PA0023256	UPPER GWYNEDO TOWNSHIP AUTHORIZ		MAJOR			ACTIVE	09/27/90
SC0021229	CHARLESTON/PLUM ISLAND PLANT		MAJOR			ACTIVE	12/31/90
TX0035220	QUAIL VALLEY UD		MAJOR			ACTIVE	08/17/92
VA0025101	MOONEY PRINCE AM. CO. UCCOQUAN		MAJOR			ACTIVE	06/28/91
WA0024058	EDMONDS, CITY OF		MAJOR			ACTIVE	08/01/90
WA0023744	BELLINGHAM, CITY OF		MAJOR			ACTIVE	03/16/93
WY0023302	CLARKSBURG SANITARY BOARD		MAJOR			ACTIVE	06/15/91
CA0079111	SACRAMENTO R.C.S.D	C	MAJOR			ACTIVE	12/01/90
LA0038109	NEW ORLEANS PAR-WESTBANK STP	C	MAJOR			ACTIVE	08/09/91
MD0021601	PATAPSCO WMTF	C	MAJOR			ACTIVE	12/31/92
MH0030007	HWCC/MC-GENECA	C	MAJOR			ACTIVE	09/30/92
MO0025151	MSO, LEMAY	C	MAJOR			ACTIVE	11/28/90
NY0026697	NEW ROCHELLE S.D.	C	MAJOR			ACTIVE	12/01/89
NY0028045	GATES-CHILI-ODDEN S.D. WMTF	C	MAJOR			ACTIVE	10/01/90
NY0029106	OSWEGO (C) WEST SIDE STP	C	MAJOR			ACTIVE	03/01/91
NY0026867	ALBANY CO SD SOUTH WMTF	C	MAJOR			ACTIVE	02/01/92
NY0108324	OSWINGO SANITARY SD WMTF	C	MAJOR			ACTIVE	04/01/92
NY0028339	FRANK E. VAN LARE STP	C	MAJOR			ACTIVE	03/01/93
NY0026786	PORT CHESTER SANITARY SD WMTF	C	MAJOR			ACTIVE	04/01/93
OH0024741	COLUMBUS, CITY OF - SOUTHERLY	C	MAJOR			ACTIVE	07/08/90
OH0045721	MAHONING CO - MEANDER CREEK	C	MAJOR			ACTIVE	03/28/91
OH0025470	HAMILTON CO.-MUDDY CREEK	C	MAJOR			ACTIVE	09/27/92
VA0025208	HAMPTON ROS.SAN.DIST-ARMY BASE	C	MAJOR			ACTIVE	03/21/90
VA0025275	HAMPTON ROS.SAN.DIST-CHESAPEAKE	C	MAJOR			ACTIVE	03/29/90
VA0025259	HAMPTON ROS.SAN.DIST-LAMBERTS	C	MAJOR			ACTIVE	10/17/90
VA0025372	FAIRFAX CO-LITTLE HUNTING CR	C	MAJOR			ACTIVE	04/30/91
OH0031062	EUCLID, CITY OF	R	MAJOR			ACTIVE	06/30/82
AK0022551	ANCHORAGE, MUNICIPALITY OF	Y	MAJOR			ACTIVE	10/15/98

ALL MUNICIPAL SEWAGE SLUDGE INCINERATORS
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PERMIT NUMBER	FACILITY NAME SHORT	PRE-TRMT CD	MAJ/MIN IND	FAC INACT CD	EXPIRE DATE
CA0037541	SAN MATEO, CITY OF	Y	MAJOR	ACTIVE	10/17/89
CA0037648	CENTRAL CONTRA COSTA	Y	MAJOR	ACTIVE	10/17/89
CA0102709	SOUTH YAHOE P.U.D.	Y	MAJOR	ACTIVE	03/15/90
CA0037834	PALO ALTO, CITY OF	Y	MAJOR	ACTIVE	12/21/91
CA0038369	SOUTH BAYSIDE SYSTEM	Y	MAJOR	ACTIVE	05/18/93
CA0107417	S.E.R.R.A.	Y	MAJOR	ACTIVE	08/29/93
FL0026000	JAX BUCKMAN ST STP #1	Y	MAJOR	ACTIVE	10/31/93
FL0021440	ESCAMBIA CNTY-MAIN STREET WTP	Y	MAJOR	ACTIVE	05/31/94
GA0025348	SAVANNAH PRESIDENT ST. WPCP	Y	MAJOR	ACTIVE	07/30/90
GA0024147	DEKALB CO-SNAPPINGER CH WPCP	Y	MAJOR	ACTIVE	05/22/91
GA0021482	ATLANTA-R M CLAYTON WPCP	Y	MAJOR	ACTIVE	06/29/92
GA0021156	GAINESVILLE FLAT CR WPCP	Y	MAJOR	ACTIVE	11/22/92
GA0026140	COBB CO-SUTTON WPCP	Y	MAJOR	ACTIVE	03/08/93
HI0020117	HONOLULU, C & C OF	Y	MAJOR	ACTIVE	04/30/88
IA0043052	DAVENPORT CITY OF STP	Y	MAJOR	ACTIVE	12/30/90
IA0042641	CEDAR RAPIDS CITY CF STP	Y	MAJOR	ACTIVE	12/31/90
IA0044458	DUBUQUE CITY OF STP	Y	MAJOR	ACTIVE	07/01/92
IN0023183	INDIANAPOLIS-BELMONT MUN. STP	Y	MAJOR	ACTIVE	08/31/90
KS0055492	JOHNSON CNTY LAND MISSION/TURK	Y	MAJOR	ACTIVE	06/10/91
KS0038563	KANSAS CITY KS WMTF #1	Y	MAJOR	ACTIVE	09/16/91
LA0038091	NEW ORLEANS, CITY OF (EAST BAN	Y	MAJOR	ACTIVE	07/16/94
MA0100382	FALL RIVER STP	Y	MAJOR	ACTIVE	04/01/88
MA0100447	GREATER LAWRENCE SD	Y	MAJOR	ACTIVE	08/02/88
MA0101588	CHICOPEE	Y	MAJOR	ACTIVE	08/29/90
MA0100908	FITCHBURG, EAST WMTF	Y	MAJOR	ACTIVE	09/30/90
MA0102369	UPPER BLACKSTONE WPAD	Y	MAJOR	ACTIVE	09/30/90
MA0100701	NEW BEDFORD WTP	Y	MAJOR	ACTIVE	12/16/91
MI0022802	DETROIT WMTF	Y	MAJOR	ACTIVE	07/31/88
MI0023299	KALAMAZOO WMTF	Y	MAJOR	ACTIVE	08/31/89
MI0024295	HARREN WMTF	Y	MAJOR	ACTIVE	09/30/89
MI0021156	WAYNE CO-WYANDOTTE WMTF	Y	MAJOR	ACTIVE	11/30/89
MI0023825	PONTIAC WMTF	Y	MAJOR	ACTIVE	10/01/90
MI0026069	GRAND RAPIDS WMTF	Y	MAJOR	ACTIVE	10/01/90
MI0023833	PORT HURON WMTF	Y	MAJOR	ACTIVE	10/01/91
MI0021164	TRENTON WMTF	Y	MAJOR	ACTIVE	10/01/92
MI0022853	EAST LANSING WMTF	Y	MAJOR	ACTIVE	10/01/92
MI0023400	LANSING WMTF	Y	MAJOR	ACTIVE	10/01/92
MI0022217	ANN ARBOR WMTF	Y	MAJOR	ACTIVE	10/01/93
MI0022926	FLINT WMTF	Y	MAJOR	ACTIVE	10/01/93
MI0042676	YCUA REGIONAL WMTF	Y	MAJOR	ACTIVE	10/01/93
MI0022284	BAY CITY WMTF	Y	MAJOR	ACTIVE	05/31/94
MN00219815	MNCC/MC-METROPOLITAN	Y	MAJOR	ACTIVE	06/30/87
MN0049786	WESTERN LAKE SD	Y	MAJOR	ACTIVE	10/31/89
MO0025178	MSD, BISSEL POINT	Y	MAJOR	ACTIVE	06/30/77
MO0089681	INDEPENDENCE CITY CF RUCK	Y	MAJOR	ACTIVE	07/05/89
MO0024911	KC, BLUE RIVER	Y	MAJOR	ACTIVE	01/30/91
NC0047384	GREENSBORO T. Z. OSBORNE WMTF	Y	MAJOR	ACTIVE	03/31/91
NH0100447	MANCHESTER	Y	MAJOR	ACTIVE	06/14/90
NJ0022349	ROCKAWAY VALLEY RES S.A.	Y	MAJOR	ACTIVE	09/14/89
NJ0024864	SOMERSET RARITAN VALLEY S.A.	Y	MAJOR	ACTIVE	02/28/90
NJ0020923	TRENTON SEWAGE TREATMENT	Y	MAJOR	ACTIVE	08/31/90
NJ0024813	NORTHWEST BERGEN COUNTY S.A.	Y	MAJOR	ACTIVE	02/28/91
NJ0028002	WAYNE, TOWNSHIP OF	Y	MAJOR	ACTIVE	05/31/91
NJ0029386	PEQUANNOCK LIN.PK.& FAIRF'LD S	Y	MAJOR	ACTIVE	07/31/91
NJ0031119	RIVER ROAD TREATMENT PLANT	Y	MAJOR	ACTIVE	08/31/93
NY0026620	GLEN COVE SEWAGE TREATMENT PLA	Y	MAJOR	ACTIVE	07/01/87
NY0029114	OSWEGO (C) EAST SIDE SEWAGE TR	Y	MAJOR	ACTIVE	03/01/89
NY0027961	DUNKIRK (C) WMTF	Y	MAJOR	ACTIVE	10/01/90
NY0028410	BIRD ISLAND WMTF	Y	MAJOR	ACTIVE	10/01/90
NY0095401	ERIE CO/SOUTHTOWN SSW TRY FAC	Y	MAJOR	ACTIVE	10/01/90
NY0028231	NORTHWEST QUAD.PURE WATERS DIS	Y	MAJOR	ACTIVE	11/01/90
NY0022403	LITTLE FALLS (C) WMTF	Y	MAJOR	ACTIVE	05/01/91
NY0021903	AUBURN (C) STP	Y	MAJOR	ACTIVE	09/01/91
NY0028248	SARATOGA CO SD# 1 WMTF	Y	MAJOR	ACTIVE	11/01/91
NY0025976	BEACON (C) WPCP	Y	MAJOR	ACTIVE	01/01/92
NY0026675	ALBANY CO SD NORTH WMTF	Y	MAJOR	ACTIVE	01/15/92
NY0026051	ORANGETOWN (T) SD#2 STP	Y	MAJOR	ACTIVE	04/01/92
NY0025984	WATERTOWN (C) WPCP	Y	MAJOR	ACTIVE	09/01/92
NY0020516	SCHENECTADY (C) WPC FACILITY	Y	MAJOR	ACTIVE	03/01/93
NY0022446	NEW WINDSOR (T) STP	Y	MAJOR	ACTIVE	05/01/93
NY0025788	ONEIDA COUNTY WPCP	Y	MAJOR	ACTIVE	06/01/93
NY0104809	SUFFOLK COUNTY SD#3-SOUTHWEST	Y	MAJOR	ACTIVE	08/01/93

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PERMIT NUMBER	FACILITY NAME SHORT	PRE-TRMT CD	MAJ/MIN IND	FAC INACT CD	EXPIRE DATE
CH0023033	AKRON, CITY OF	Y	MAJOR	ACTIVE	11/25/89
CH0024732	COLUMBUS, CITY OF-JACKSON PIKE	Y	MAJOR	ACTIVE	07/08/90
CH0025461	HAMILTON COUNTY MILL CREEK	Y	MAJOR	ACTIVE	10/14/91
CH0028126	WILLOUGHBY, CITY OF	Y	MAJOR	ACTIVE	08/17/92
CH0028223	YOUNGSTOWN, CITY OF	Y	MAJOR	ACTIVE	09/27/92
CH0024350	CANTON, CITY OF	Y	MAJOR	ACTIVE	03/14/94
PA0026921	GREATER HAZELTON SEWAGE TREATM	Y	MAJOR	ACTIVE	09/21/89
PA0026727	TYRONE BOROUGH SEWER AUTH-STP	Y	MAJOR	ACTIVE	12/13/89
PA0025976	UPPER MORELAND-HATEORO SEWAGE	Y	MAJOR	ACTIVE	02/07/90
PA0026484	DERRY TOWNSHIP MUN. AUTH.	Y	MAJOR	ACTIVE	03/29/90
PA0026816	EAST NORRITON-PLYMOUTH JOINT S	Y	MAJOR	ACTIVE	04/23/90
PA0026361	LOWER LACKAWANNA VALLEY SAN. A	Y	MAJOR	ACTIVE	06/16/90
PA0026034	JOHNSTOWN, CITY OF	Y	MAJOR	ACTIVE	06/28/90
PA0026247	HATFIELD TWP. MUN. AUTH.	Y	MAJOR	ACTIVE	09/27/90
PA0025984	ALLEGHENY COUNTY SAN. AUTH.	Y	MAJOR	ACTIVE	09/30/90
PA0026107	WYOMING VALLEY SANITARY AUTHON	Y	MAJOR	ACTIVE	10/30/90
PA0027103	DELAWARE CTY. REG. WATER QUAL	Y	MAJOR	ACTIVE	09/22/91
PA0026381	ERIE SEWER AUTH.	Y	MAJOR	ACTIVE	09/23/91
PA0026263	YORK CITY WASTEWATER TMT PLANT	Y	MAJOR	ACTIVE	03/31/92
PA0027026	KISKI VALLEY WTR POLL. CONTROL	Y	MAJOR	ACTIVE	08/18/93
RI0100013	CRANSTON	Y	MAJOR	ACTIVE	05/01/94
SC0020940	COLUMBIA/METRO PLANT	Y	MAJOR	ACTIVE	01/31/91
TH0023831	BRISTOL STP 02	Y	MAJOR	ACTIVE	11/14/89
TH0020079	MARYVILLE STP	Y	MAJOR	ACTIVE	12/17/89
TH0020782	NEWPORT STP	Y	MAJOR	ACTIVE	03/28/90
TH0020575	NASHVILLE CENTRAL STP	Y	MAJOR	ACTIVE	01/30/91
VA0006044	BLACKSBURG-VPI 3A-STROUBLES CK	Y	MAJOR	ACTIVE	08/14/89
VA0025143	ARLINGTON STP	Y	MAJOR	ACTIVE	06/26/91
VA0025364	FAIRFAX CO-LOWER POTOMAC POLL	Y	MAJOR	ACTIVE	06/27/91
VA0004430	HOPEWELL STP CITY OF	Y	MAJOR	ACTIVE	09/30/91
WA0024031	LYNWOOD, CITY OF	Y	MAJOR	ACTIVE	08/01/92
WA0024350	VANCOUVER, CITY OF (STP)WEST	Y	MAJOR	ACTIVE	10/06/92
WI0023787	DE PERE CITY	Y	MAJOR	ACTIVE	09/30/89
WI0023469	BROOKFIELD, FOX WATER POLLUTIO	Y	MAJOR	ACTIVE	06/30/93
WI0020991	GREEN BAY METROPOLITAN SEWERAG	Y	MAJOR	ACTIVE	12/31/93

Attachment 3

Pretreatment POTWs with Sludge Incinerators

09/28/89

PRETREATMENT POTHS WITH SEWAGE SLUDGE INCINERATORS
 C = COVERED BY A REQUIRED PRETREATMENT PROGRAM
 R = REQUIRED PROGRAM NOT YET IN PLACE
 Y = REQUIRED PROGRAM IN PLACE

QL *****

REGION	CD	PERMIT NUMBER	FACILITY NAME SHORT	PRE-TRMT CD	MAJ/MIN	IND	EXPIRE DATE
01		RI0100013	CRANSTON WMTF	Y	MAJOR		05/01/94
02		NY0020516	SCHENECTADY (C) MPC FACILITY	Y	MAJOR		03/01/93
02		NY0021903	AUBURN (C) STP	Y	MAJOR		09/01/91
02		NY0022403	LITTLE FALLS (C) WMTF	Y	MAJOR		05/01/91
02		NY0025700	ONEIDA COUNTY WPCP	Y	MAJOR		06/01/93
02		NY0025976	BEACON (C) WTP	Y	MAJOR		01/01/92
02		NY0025904	WATERTOWN (C) WPCP	Y	MAJOR		09/01/92
02		NY0026051	ORANGETOWN (T) SD82 STP	Y	MAJOR		04/01/92
02		NY0026620	GLEN COVE SEWAGE TREATMENT PLA	Y	MAJOR		07/01/87
02		NY0026667	ALBANY CO SO SOUTH WMTF	C	MAJOR		02/01/92
02		NY0026675	ALBANY CO SO NORTH WMTF	Y	MAJOR		01/15/92
02		NY0026045	GATES-CHILI-ORRIS S.D. WMTF	C	MAJOR		10/01/90
02		NY0026231	NORTHWEST QUAD. PURE WATERS DIS	Y	MAJOR		11/01/90
02		NY0026339	FRANK E. VAN LARE STP	C	MAJOR		03/01/93
02		NY0026410	BIRD ISLAND WMTF	Y	MAJOR		10/01/90
02		NY0095401	ERIE CO/SOUTHTOWNS SEM TRT FAC	Y	MAJOR		10/01/90
03		PA0026034	JOHNSTOWN, CITY OF	Y	MAJOR		06/28/90
03		PA0026107	WYOMING VALLEY SANITARY AUTHOR	Y	MAJOR		10/30/90
03		PA0026263	YORK CITY WASTEWATER TMT PLANT	Y	MAJOR		03/31/92
03		PA0026301	ERIE SEWER AUTH.	Y	MAJOR		09/23/91
03		PA0026361	LOWER LACKAWANNA VALLEY SAN. A	Y	MAJOR		06/16/90
03		PA0026404	DERBY TOWNSHIP MUN. AUTH.	Y	MAJOR		03/29/90
03		PA0026727	TYRONE BOROUGH SEWER AUTH-STP	Y	MAJOR		12/13/89
03		PA0026921	GREATER HAZELTON SEWAGE TREAT	Y	MAJOR		09/21/90
03		PA0027103	DELAWARE CTY. REG. WATER QUAL	Y	MAJOR		09/22/91
03		PA0027626	KISKI VALLEY MTR POLL. CONTROL	Y	MAJOR		08/18/93
03		VA0025143	ARLINGTON STP	Y	MAJOR		06/26/91
03		VA0025364	FAIRFAX CO-LOWER POTOMAC POLL	Y	MAJOR		06/27/91
03		VA0025372	FAIRFAX CO-LITTLE HUNTING CR	C	MAJOR		06/30/91
03		VA0066630	HOPIWELL STP CITY OF	Y	MAJOR		09/30/91
04		SC0020940	COLUMBIA/METRO PLANT	Y	MAJOR		01/31/91
04		SC0024703	NCSB / FELIX C DAVIS WMTF	Y	MAJOR		01/31/92
04		TH0020079	MARYVILLE STP	Y	MAJOR		12/17/89
04		TH0020702	NEWPORT STP	Y	MAJOR		03/28/90
04		TH0023531	BRISTOL STP 02	Y	MAJOR		11/14/89
05		OH0023033	AKRON, CITY OF	Y	MAJOR		11/25/89
05		OH0024350	CANTON, CITY OF	Y	MAJOR		03/14/90
05		OH0024732	COLUMBUS, CITY OF-JACKSON PIKE	Y	MAJOR		07/08/90
05		OH0024741	COLUMBUS, CITY OF - SOUTHERLY	C	MAJOR		07/08/90
05		OH0025461	HAMILTON COUNTY HILL CREEK	Y	MAJOR		10/14/91
05		OH0026223	YOUNGSTOWN, CITY OF	Y	MAJOR		09/27/92
05		OH0031062	EUCLID, CITY OF	R	MAJOR		06/30/82
05		WI0020991	GREEN BAY METROPOLITAN SEWERAG	Y	MAJOR		12/31/93
05		WI0023469	BROOKFIELD FOX WATER POLLUTION	Y	MAJOR		06/30/93
10		WA0024031	LYNNWOOD, CITY OF	Y	MAJOR		08/01/92
10		WA0024350	VANCOUVER, CITY OF (STP)WEST	Y	MAJOR		10/06/92

SUB-TOTAL QUICK LOOK PRINT LINES:

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09/28/89

PRETREATMENT POTHS WITH SEWAGE SLUDGE INCINERATORS
 C = COVERED BY A REQUIRED PRETREATMENT PROGRAM
 R = REQUIRED PROGRAM NOT YET IN PLACE
 Y = REQUIRED PROGRAM IN PLACE

QL *****

REGION	CO	PERMIT NUMBER	FACILITY NAME SHORT	PRE-TRMT CO	MAJ/MIN IND	EXPIRE DATE
01		MA0100701	HEM BEDFORD WTP	Y	MAJOR	12/16/91
01		MA0100906	FITCHBURG, EAST WMTF	Y	MAJOR	09/30/90
01		MA0101500	CHICOPEE	Y	MAJOR	08/29/90
01		MA0102369	UPPER BLACKSTONE WPAD	Y	MAJOR	09/30/90
02		NJ0020923	TRENTON SEWAGE TREATMENT	Y	MAJOR	08/31/90
02		NJ0022349	ROCKAWAY VALLEY RES S.A.	Y	MAJOR	09/14/89
02		NJ0024013	NORTHWEST BERGEN COUNTY S.A.	Y	MAJOR	02/28/91
02		NJ0024064	SOMERSET RARITAN VALLEY S.A.	Y	MAJOR	02/28/90
02		NJ0028002	MAYNE, TOWNSHIP OF	Y	MAJOR	05/31/91
02		NJ0031119	RIVER ROAD TREATMENT PLANT	Y	MAJOR	08/31/93
03		MD0021601	PATAPSCO WMTF	C	MAJOR	12/31/92
04		FL0026000	JAX BUCKMAN ST STP 01	Y	MAJOR	10/31/93
04		GA0021154	GAINESVILLE FLAT CR WPCP	Y	MAJOR	11/22/92
04		GA0021402	ATLANTA-R M CLAYTON WPCP	Y	MAJOR	06/29/92
04		GA0024147	DEKALB CO-SNAPPINGER CR WPCP	Y	MAJOR	05/22/91
04		GA0025340	SAVANNAH PRESIDENT ST. WPCP	Y	MAJOR	07/30/90
04		GA0026140	COBB CO-SUTTON WPCP	Y	MAJOR	03/08/93
04		NC0024530	SHELBY WMTF, CITY OF	Y	MINOR	10/31/91
04		NC0030317	ROCKY MOUNT (TAR RIVER WMTF)	Y	MINOR	09/30/93
04		NC0047304	GREENSBORO T. Z. OSBORNE WMTF	Y	MAJOR	03/31/91
05		IN0023103	INDIANAPOLIS-BELMONT HLM. STP	Y	MAJOR	08/31/90
05		MI0021156	MAYNE CO-MYANDOTTE WMTF	Y	MAJOR	11/30/89
05		MI0022217	ANN ARBOR WMTF	Y	MAJOR	10/01/93
05		MI0022204	BAY CITY WMTF	Y	MAJOR	05/31/94
05		MI0022602	DETROIT WMTF	Y	MAJOR	07/31/88
05		MI0022603	EAST LANSING WMTF	Y	MAJOR	10/01/92
05		MI0023299	KALAMAZOO WMTF	Y	MAJOR	08/31/89
05		MI0023025	PONTIAC WMTF	Y	MAJOR	10/01/90
05		MI0023033	PORT HURON WMTF	Y	MAJOR	10/01/91
05		MI0024298	WARREN WMTF	Y	MAJOR	09/30/89
05		MI0042676	YCUA REGIONAL WMTF	Y	MAJOR	10/01/93
05		MN0029015	MNCC/MC-METROPOLITAN	Y	MAJOR	06/30/87
05		MN0030007	MNCC/MC-SENECA	C	MAJOR	09/30/92
05		MN0049706	WESTERN LAKE SSD	Y	MAJOR	10/31/89
06		LA0030091	NEW ORLEANS, CITY OF (EAST BAN	Y	MAJOR	07/16/94
06		LA0030108	NEW ORLEANS FAR-WESTBANK STP	C	MAJOR	08/09/91
07		IA0042641	CEDAR RAPIDS CITY OF STP	Y	MAJOR	12/31/90
07		IA0043052	DAVENPORT CITY OF STP	Y	MAJOR	12/30/90
07		IA0044450	DUBUQUE CITY OF STP	Y	MAJOR	07/01/92
07		KS0058492	JOHNSON CNTY LAND MISSION/TURK	Y	MAJOR	06/10/91
07		MO0024911	KC, BLUE RIVER	Y	MAJOR	01/30/91
07		MO0025151	MSD, LINAY	C	MAJOR	11/20/90
07		MO0025170	MSD, BISSEL POINT	Y	MAJOR	12/01/92
07		MO0049601	INDEPENDENCE CITY OF ROCK	Y	MAJOR	07/05/89
09		CA0037341	SAN MATEO, CITY OF	Y	MAJOR	10/17/89
09		CA0037640	CENTRAL CONTRA COSTA	Y	MAJOR	10/17/89
09		CA0037830	PALO ALTO, CITY OF	Y	MAJOR	12/21/91
09		CA0079111	SACRAMENTO R.C.S.B	C	MAJOR	12/01/90
09		CA0102700	SOUTH YAMH P.U.B.	Y	MAJOR	03/15/90
09		HI0020117	HONOLULU, C & C OF	Y	MAJOR	04/30/80
10		AK0022552	ANCHORAGE, MUNICIPALITY OF	Y	MAJOR	10/15/90

SUB-TOTAL QUICK LOOK PRINT LINES:

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ATTACHMENT 4

LIST OF POLLUTANTS PROPOSED TO BE LIMITED IN 40 CFR PART 503

Incineration:

Arsenic
Beryllium
Cadmium
Chromium
Lead
Mercury
Nickel
Total hydrocarbons

Surface Disposal:

Arsenic
Benzene
Benzo(a)pyrene
Bis(2-ethylhexyl)phthalate
Cadmium
Copper
DDT/DDE/DDD (Total)
Dimethyl nitrosamine
Lead
Lindane
Mercury
Nickel
Polychlorinated byphenyls
Toxaphene
Trichloroethylene

Monofills

Arsenic
Benzene
Benzo(a)pyrene
Bis(2-ethylhexyl)phthalate
Cadmium
Chlordane
Copper
DDT/DDE/DDD (total)
Dimethyl Nitrosamine
Lead
Lindane
Mercury
Nickel
Polychlorinated byphenyls
Toxaphene
Trichloroethylene

Land Application:

Aldrin/dieldrin
Benzo(a)pyrene
Cadmium
Chlordane
Copper
DDT/DDE/DDD (total)
Heptachlor
Hexachlorobenzene
Hexachlorobutadiene
Lead
Lindane
Mercury
Nickel
Polychlorinated byphenyls
Selenium
Toxaphene
Zinc

Distribution & Marketing

Aldrin/dieldrin
Arsenic
Benzo(a)pyrene
Cadmium
Chlordane
Chromium
Copper
DDT/DDE/DDD (total)
Heptachlor
Hexachlorobenzene
Hexachlorobutadiene
Lead
Lindane
Mercury
Nickel
Polychlorinated byphenyls
Selenium
Toxaphene
Zinc

Co-Disposal

No pollutant limits
proposed

Attachment 5

**Model Certification of EPA Approval of
State-Issued Sludge Permits**

ATTACHMENT 5

CERTIFICATION OF APPROVAL

The U.S. Environmental Protection Agency has reviewed the requirements for sludge use and disposal in Permit No. _____ proposed to be issued to _____ and finds them adequate to protect public health and the environment in accordance with section 405(d) of the Clean Water Act, 33 U.S.C. §1251 et seq. Violations of the sludge conditions or use and disposal requirements in this permit may be enforced by EPA pursuant to section 309 of the Clean Water Act.

This certification of approval does not preclude future action to modify the permit to include different or additional sludge use or disposal requirements which are necessary to implement regulations promulgated by EPA pursuant to section 405(d) of the Clean Water Act. This certification will expire when the permit expires or is modified to include new or different sludge requirements, whichever occurs first.

Date

[signature of Regional Office
official responsible for
signing NPDES permits]

[NOTE: A letter or certification of approval should be used only when all State requirements are adequate. Where EPA is responsible for issuing sludge requirements (as per a joint permitting agreement with the State or when needed to supplement inadequate State requirements), it should issue a "sludge rider" to the State permit. See Attachment 6]

Attachment 6

Model EPA "Sludge Rider" to a State-Issued Permit

ATTACHMENT 6

SLUDGE ADDENDUM ISSUED BY
THE U.S. ENVIRONMENTAL PROTECTION AGENCY

[For use when EPA is responsible for sludge permit conditions and the State issues the NPDES permit or where EPA and the State jointly issue a permit with separate EPA and State sludge requirements.]

[Option A: Where EPA incorporates state sludge requirements]

1) Pursuant to Section 405(d)(4) of the Clean Water Act (33 U.S.C. 1251 et seq.), as amended by the Water Quality Act of 1987 (P.L. 100-4) ("CWA"), EPA has reviewed and approved the conditions in this permit regulating sludge use and disposal practices as adequate to protect public health and the environment. In addition to the conditions contained in Sections __, __, and ____ of this permit [in the ____ permit attached to this addendum], the permittee shall:

- a) [gap fillers from CBC or other interim guidance; NPDES
- b) reg. revisions at 54 FR 18716, May 2, 1989 (See Attachment 1)]
- c)

[Option B: Where EPA does not incorporate State requirements]

1) Pursuant to Section 405 of the Clean Water Act (33 U.S.C. 1251 et seq.), as amended by the Water Quality Act of 1987 (P.L. 100-4) ("CWA"), the permittee shall comply with the following terms and conditions governing sludge use and disposal practices.

- a) [contaminant levels, management practices, monitoring and reporting requirements from CBC and other guidance
- b) on interim sludge requirements; NPDES reg. revisions at 54 FR 18716. May 2, 1989 (See Attachment 1)]
- c)

2) Failure to comply with any of the conditions regulating sludge use and disposal practices referenced in paragraph 1 of this addendum is a violation of Section 405 of the Clean Water Act and is subject to a federal enforcement action in accordance with Section 309 of the CWA. Section 309 provides that any person who violates Section 405 or a permit implementing section 405 is subject to a civil penalty of up to \$25,000 per day for each violation. Any person who negligently violates Section 405 or a permit condition implementing section 405 is subject to a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or by imprisonment for not more than one year, or both. Any person who knowingly violates section 405 or a permit condition implementing section 405 is subject to a fine of not less than \$5,000 nor more than \$50,000 per day of violation, or by imprisonment for not more than three years, or both.

3) If an applicable management practice or numerical limitation for pollutants in sewage sludge promulgated under Section 405(d) of the CWA is more stringent than the sludge pollutant limit or management practice in this addendum, or controls a pollutant not limited in this addendum, this addendum may be modified or revoked and reissued to conform to the requirements promulgated under Section 405(d). However, the requirement to comply is not dependent on permit modification or reissuance. Compliance with any applicable sludge requirement promulgated under Section 405(d) is required by the deadlines specified those regulations.

4)(a) Copies of all reports relating to sludge use and disposal practices required by this [permit and] addendum shall be filed with:

_____ Branch
EPA Region _____

(b) All reports required by this addendum must be signed by the principal executive officer or ranking elected official who is responsible for signing reports required by the permittee's NPDES permit (see 40 CFR 122.22). The signature must be accompanied by the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(c) Section 309 of the CWA provides that any person who knowingly makes any false statements in any document required by the CWA or who knowingly falsifies or tampers with any monitoring device or method is subject to a fine of not more than \$10,000, or by imprisonment for not more than two years, or by both.

5) The permittee shall allow agents and authorized representatives of the U.S. Environmental Protection Agency, upon presentation of credentials, to:

(a) Enter upon the permittee's premises where a regulated

facility or activity is located or conducted, or where records required by this addendum are kept;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this addendum;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this addendum; and

(d) Sample or monitor at reasonable times, for the purposes of assuring compliance with the conditions of this addendum or as otherwise authorized by the Clean Water Act, any substances, parameters, or practices at any location.

6) Compliance with the terms and conditions of this Addendum does not relieve the permittee of its obligation to comply with any additional or more stringent requirements imposed by State or local law.

7) This addendum shall be effective on the date the final permit becomes effective. It will terminate upon the expiration of the permit or upon modification of the addendum to include new or different sludge requirements, whichever occurs first.

Date

[Signature of Regional Office
official responsible for
signing NPDES permits]

Attachment 7

Permitting Responsibility Flow Chart

ATTACHMENT 7

IMPLEMENTATION OF INTERIM SLUDGE REQUIREMENTS UNDER
SECTION 405(d) OF THE CLEAN WATER ACTAGREEMENT BETWEEN THE [STATE AGENCY]
AND
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION ____

I. GENERAL

This Agreement establishes how [State] and Region ____ of the United States Environmental Protection Agency will share responsibility for the implementation of interim sludge requirements for publicly-owned treatment works [POTWs] pursuant to Section 405(d)(4) of the Clean Water Act.

The [State Agency] agrees to follow EPA policy and Guidance which address the implementation of interim sludge requirements pursuant to Section 405(d)(4) to the extent authorized under State law and as described below. EPA agrees to provide the [State Agency] with technical and other assistance in developing sludge requirements for POTWS and undertaking other implementation activities to the extent resources allow.

II. PERMITTING RESPONSIBILITIESA. Designation of Class 1 Permits

The [State Agency] and EPA Region ____ together will develop a list of Class 1 POTWs in the State whose NPDES permits have expired or will expire during the term of this Agreement. This list will be developed using the "Sewage Sludge Interim Permitting Strategy." The [State Agency] and EPA Region ____ will confer as necessary to update the list (e.g., to add new facilities or existing facilities with newly-discovered problems.)

B. State Permitting Responsibilities

The [State Agency] agrees to include interim sludge use and disposal requirements in [NPDES or other State program] permits issued to the following categories of POTWs at the time the POTW's NPDES permit is due for reissuance:

[Here the Agreement should specify categories of POTWs, e.g., those that landfill their sludge.]

C. EPA Permitting Responsibilities

Region _ will be responsible for including interim sludge use and disposal requirements in NPDES permits (re)issued to the following POTWs:

[Specify categories of POTWs. Specific POTWs may be identified separately.]

D. Joint State/EPA Permitting Responsibilities

EPA Region _ and [State Agency] agree to assume joint responsibility for including sludge requirements in permits issued to the follow POTWs:

[Specify categories of POTWs. Specific POTWs may be identified separately.]

III. Permitting Procedures

A. Class 1 POTWs

1. The [State Agency] agrees to include in the permit: conditions applicable to all POTWs established in the "Sewage Sludge Interim Permitting Strategy"; conditions necessary to implement existing federal law; and any additional conditions necessary to protect public health and the environment from any adverse effects that may occur from toxic pollutants in sewage sludge.

2. The [State Agency] agrees to include in the public notice of the draft permit the following statement: "This permit includes requirements for sludge use and disposal that are intended to implement Section 405(d) of the Clean Water Act. Therefore, after review and approval by EPA and final issuance of the permit, these requirements [specify] will be federally enforceable pursuant to Section 309 of the Clean Water Act."

3. The [State Agency] will send copies of the draft permit, together with any fact sheet and other documentation of the basis for the sludge requirements, to EPA Region _, Water Permits Branch, no later than the time the permit is publicly noticed. [Note: The Agreement may also provide for EPA review of pre-public notice drafts of the permit.]

4. EPA Region _ will review the permit and determine if the requirements for sludge use and disposal are adequate for purposes of Section 405(d) of the Clean Water Act within the public comment period for the draft permit (but no less than 30 days). The period for EPA review may be extended by mutual agreement. If the sludge use and disposal requirements change

significantly as a result of public comment, the proposed permit shall be resubmitted to EPA for an additional 30-day review period.

5. If EPA determines that the sludge requirements in the permit are adequate, it will send written certification indicating its approval to the [State Agency]. A copy of the certification should be attached to the final permit.

6. If EPA determines that the sludge requirements in the permit are not adequate for purposes of §405(d), it will include the different or additional requirements it deems appropriate to protect public health and the environment in [a sludge addendum to the State-issued permit or in a separate EPA-issued sludge permit].

B. Joint Issuance Procedures

[The agreement should address who will have lead responsibility for drafting the sludge requirements and accompanying fact sheet, for issuing the public notice (including notice of federal enforceability), and for organizing public hearings.]

C. Non-Class 1 POTWS

1. The [State Agency] agrees to include in permits issued to non-Class 1 POTWs the minimum monitoring conditions and boilerplate provisions set forth in the "Sewage Sludge Interim Permitting Strategy."

2. EPA will oversee the imposition of interim requirements for non-priority POTW permits through general program review activities, such as the annual review, permit file reviews, and file audits.

IV. Sharing of Information

The [State Agency] and EPA Region _ agree to share, upon request, information concerning their sludge management programs, including copies of permits and the results of any sludge-related monitoring activities.

V. Compliance Monitoring and Enforcement

The [State Agency] will operate a timely and effective compliance monitoring system to track compliance of permittees with permit conditions. Compliance monitoring shall normally focus first on Class 1 POTWs in accordance with the priorities established in the "Sewage Sludge Interim Permitting Strategy."

A. Schedule Dates

The [State Agency] will track the submittal of all reports on date-related permit conditions. In order to determine the permittee's compliance status, the [State Agency] will conduct a timely and substantive review of all date-related permit conditions and reports and consider possible enforcement actions for failure to submit required reports.

B. Review of Self-Monitoring Reports

The [State Agency] will conduct a review of self-monitoring reports, and will evaluate the permittee's compliance status.

C. Facility Inspections

The State shall conduct periodic inspections to ensure that the permittee is in compliance with all permit conditions. The State shall include information as to the POTW's compliance with the sludge requirements of its permit in the inspections and reports of such inspections conducted to monitor compliance with NPDES requirements, unless such information is obtained pursuant to comparable compliance monitoring provisions under another permit program.

D. Enforcement

1. The [State Agency] is responsible for taking timely and appropriate enforcement action against permittees in violation of compliance schedules, numeric limitations, and all other permit conditions. This responsibility encompasses violations whether detected by the [State Agency] or EPA Region __ compliance monitoring and inspections.

2. EPA Region __ is responsible for providing oversight of [State Agency] enforcement activities and to initiate direct federal enforcement where appropriate.

VI. Duration/Modification of the Agreement

A. Duration

This Agreement covers only issuance of interim sludge requirements and is not a substitute for formal program approval. The Agreement will become effective when it is signed by the [State Director] and the EPA Water Management Division Director and will be in effect until terminated voluntarily by the parties, or by EPA upon promulgation of the technical sludge standards pursuant to CWA Section 405(d).

B. Modification

This agreement may be modified upon mutual consent of the parties, but may not be modified to exclude any provisions required by the "Sewage Sludge Interim Permitting Strategy."

DATE

STATE DIRECTOR
[State Agency]

DATE

WATER MANAGEMENT DIVISION
DIRECTOR, Region __

Attachment 8

Model State/EPA Sludge Agreement

ATTACHMENT 8

CWA SECTION 405, AS AMENDED BY THE WATER QUALITY ACT OF 1987

Sec. 405. Disposal of Sewage Sludge

(a) Notwithstanding any other provision of this Act, or any other law, in the case where the disposal of sewage sludge resulting from the operation of a treatment works as defined in section 212 of this Act (including the removal of in-place sewage sludge from one location and its deposit at another location) would result in any pollutants from such sewage sludge entering the navigable waters, such disposal is prohibited except in accordance with a permit issued by the Administrator under section 402 of this Act.

(b) The Administrator shall issue regulations governing the issuance of permits for the disposal of sewage sludge subject to subsection (a) of this section and section 402 of this Act. Such regulations shall require the application to such disposal of each criterion, factor, procedure, and requirement applicable to a permit issued under section 402 of this title.

(c) Each State desiring to administer its own permit program for disposal of sewage sludge subject to subsection (a) of this section within its jurisdiction may do so in accordance with section 402 of this Act.

(d) Regulations --

(1) Regulations. -- The Administrator, after consultation with appropriate Federal and State agencies and other interested persons, shall develop and publish, within one year after the date of the enactment of this subsection and from time to time thereafter, regulations providing guidelines for the disposal of sludge and the utilization of sludge for various purposes. Such regulations shall --

(A) identify uses for sludge, including disposal;

(B) specify factors to be taken into account in determining the measures and practices applicable to each such use or disposal (including publication of information on costs);

(C) identify concentrations of pollutants which interfere with each such use or disposal.

The Administrator is authorized to revise any regulation issued under this subsection.

(2) Identification and Regulation of Toxic Pollutants. --

(A) On Basis of Available Information. --

(i) Proposed Regulations. -- Not later than November 30, 1986, the Administrator shall identify those toxic pollutants which, on the basis of available information on their toxicity, persistence, concentration, mobility, or potential for exposure, may be present in sewage sludge in concentrations which may adversely affect public health or the environment, and propose regulations specifying acceptable management practices for sewage sludge containing each such toxic pollutant and establishing numerical limitations for each such pollutant for each use identified under paragraph

(1)(A).

(ii) Final Regulations. -- Not later than August 31, 1987, and after opportunity for public hearing, the Administrator shall promulgate the regulations required by subparagraph (A)(i).

(B) Others. --

(i) Proposed Regulations. -- Not later than July 31, 1987, the Administrator shall identify those toxic pollutants not identified under subparagraph (A)(i) which may be present in sewage sludge in concentrations which may adversely affect public health or the environment, and propose regulations specifying acceptable management practices for sewage sludge containing each such toxic pollutant and establishing numerical limitations for each pollutant for each such use identified under paragraph **(1)(A).**

(ii) Final Regulations. -- Not later than June 15, 1988, the Administrator shall promulgate the regulations required by subparagraph **(B)(i).**

(C) Review. -- From time to time, but not less often than every 2 years, the Administrator shall review the regulations promulgated under this paragraph for the purpose of identifying additional toxic pollutants and promulgating regulations for such pollutants consistent with the requirements of this paragraph.

(D) Minimum Standards; Compliance Date. -- The management practices and numerical criteria established under subparagraphs (A), (B), and (C) shall be adequate to protect public health and the environment from any reasonably anticipated adverse effects of each pollutant. Such regulations shall require compliance as expeditiously as practicable but in no case later than 12 months after their publication, unless such regulations require the construction of new pollution

control facilities, in which case the regulations shall require compliance as expeditiously as practicable but in no case later than two years from the date of their publication.

(3) **Alternative Standards.** -- For purposes of this subsection, if, in the judgment of the Administrator, it is not feasible to prescribe or enforce a numerical limitation for a pollutant identified under paragraph (2), the Administrator may instead promulgate a design, equipment, management practice, or operational standard, or combination thereof, which in the Administrator's judgment is adequate to protect public health and the environment from any reasonably anticipated adverse effects of such pollutant. In the event the Administrator promulgates a design or equipment standard under this subsection, the Administrator shall include as part of such standard such requirements as will assure the proper operation and maintenance of any such element of design or equipment.

(4) **Conditions on Permits.** -- Prior to the promulgation of the regulations required by paragraph (2), the Administrator shall impose conditions in permits issued to publicly-owned treatment works under section 402 of this Act or take such other measures as the Administrator deems appropriate to protect public health and the environment from any adverse effects which may occur from toxic pollutants in sewage sludge.

(5) **Limitations on Statutory Construction.** -- Nothing in this section is intended to waive more stringent requirements established by this Act or any other law.

(e) **Manner of Sludge Disposal.** -- The determination of the manner of disposal or use of sludge is a local determination, except that it shall be unlawful for any person to dispose of sludge from a publicly owned treatment works or any other treatment works treating domestic sewage for any use for which regulations have been established pursuant to subsection (d) of this section, except in accordance with such regulations.

(f) **Implementation of Regulations.** --

(1) **Through Section 402 Permits.** -- Any permit issued under section 402 of this Act to a publicly owned treatment works or any other treatment works treating domestic sewage shall include requirements for the use and disposal of sludge that implement the regulations established pursuant to subsection (d) of this section, unless such requirements have been included in a permit issued under the appropriate provisions of subtitle C of the Solid Waste Disposal Act, part C of the Safe Drinking Water Act, the Marine Protection, Research, and Sanctuaries Act of 1972, or the Clean Water Act, or under State permit programs approved by the Administrator,

where the Administrator determines that such programs assure compliance with any applicable requirements of this section. Not later than December 15, 1986, the Administrator shall promulgate procedures for approval of State programs pursuant to this paragraph.

(2) Through Other Permits. -- In the case of a treatment works described in paragraph (1) that is not subject to section 402 of this Act and to which none of the other above listed permit programs nor approved State permit authority apply, the Administrator may issue a permit to such treatment works solely to impose requirements for the use and disposal of sludge that implement the regulations established pursuant to subsection (d) of this section. The Administrator shall include in the permit appropriate requirements to assure compliance with the regulations established pursuant to subsection (d) of this section. The Administrator shall establish procedures for issuing permits pursuant to this paragraph.

(g) Studies and Projects. --

(1) Grant Program; Information Gathering. -- The Administrator is authorized to conduct or initiate scientific studies, demonstration projects, and public information and education projects which are designed to promote the safe and beneficial management or use of sewage sludge for such purposes as aiding the restoration of abandoned mine sites, conditioning soil for parks and recreation areas, agricultural and horticultural uses, and other beneficial purposes. For the purposes of carrying out this subsection, the Administrator may make grants to State water pollution control agencies, other public or nonprofit agencies, institutions, organizations, and individuals. In cooperation with other Federal departments and agencies, other public and private agencies, institutions, and organizations, the Administrator is authorized to collect and disseminate information pertaining to the safe and beneficial use of sewage sludge.

(2) Authorization of Appropriations. -- For the purposes of carrying out the scientific studies, demonstration projects, and public information and education projects authorized in this section, there is authorized to be appropriated for fiscal years beginning after September 30, 1986, not to exceed \$5,000,000.

[In addition, Section 406(e) of PL 100-4 stipulates:

"(e) Removal Credits. -- The part of the decision of Natural Resources Defense Council, Inc. v. U.S. Environmental Protection Agency, No. 84-3530 (3d Cir. 1986), which addresses section 405(d) of the Federal Water Pollution

Control Act is stayed until August 31, 1987, with respect to -- (1) those publicly owned treatment works the owner or operator of which received authority to revise pretreatment requirements under section 307(b)(1) of such Act before the date of the enactment of this section, and (2) those publicly owned treatment works the owner or operator of which has submitted an application for authority to revise pretreatment requirements under such section 307(b)(1) which application is pending on such date of enactment and is approved before August 31, 1987. The Administrator shall not authorize any other removal credits under such Act until the Administrator issues the regulations required by paragraph (2)(A)(ii) of section 405(d) of such Act, as amended by subsection (a) of this section."]