APPENDIX E

United States
Environmental Protection
Agency
Office of Water (4203)

EPA 833-B-94-004
July 1994

E PA NPDES and Sewage Sludge Program Authority

A Handbook for Federally Recognized Indian Tribes

Table of Contents

Introduction 3
What Are the NPDES and Sewage Sludge Programs? 5
What Is a Permit and How Is It Developed, Issued, and Enforced? 9
What Are the Roles of Federally Recognized Tribes In Administering NPDES and/or Sewage Sludge Programs? 15
What Are the Advantages and Disadvantages of Obtaining Authorization for NPDES and/or Sewage Sludge Programs? 17
How Can a Federally Recognized Tribe Obtain Authority to Operate an NPDES and/or Sewage Sludge Program? 23
What Assistance Is Available to Tribes? 27
Additional Resources 31

Introduction

Section 518 of the Clean Water Act (CWA) directs EPA to promulgate regulations on how Federally recognized American Indian Tribes can obtain authority to run their own wastewater and sewage sludge programs. On December 22, 1993, EPA published in the Federal Register [58 FR 67966] a rule citing the requirements for determining whether a Federally recognized Tribe is eligible for "Treatment in a Similar Manner as a State."[1] The rule also specified the procedures for obtaining authorization from EPA for the National Pollutant Discharge Elimination System (NPDES) and sewage sludge programs.

This handbook provides general information on the NPDES wastewater and sewage sludge programs for Federally recognized Tribes. It:

- Discusses Treatment in a Similar Manner as a State programmatic requirements and the definition of Federally recognized Tribes,
- Describes the NPDES and the National Sewage Sludge Programs,
- Discusses the advantages and disadvantages in assuming these programs, and
- Outlines the steps a Tribe would take to qualify for Treatment in a Similar Manner as a State.

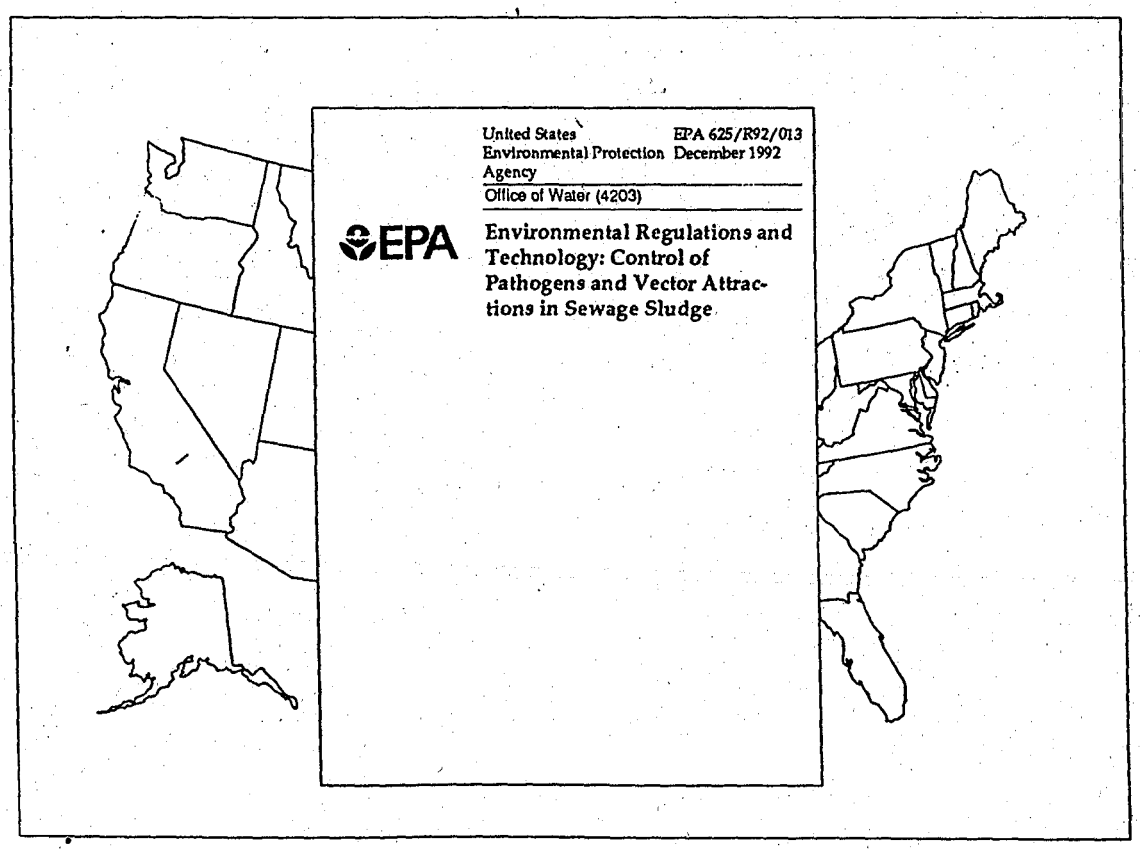
The handbook also addresses these questions:

- What are the NPDES and National Sewage Sludge Programs?
- What is a permit and how is it developed, issued, and enforced?
- What are the roles of Federally recognized Tribes in administering an NPDES and/or sewage sludge program?
- What are the advantages and disadvantages of obtaining authorization for an NPDES and/or sewage sludge program?

1. EPA has proposed regulations (59 FR 13820, March 23, 1994) to simplify the demonstration Tribes must make for Treatment in a Similar Manner as a State under various environmental programs, including CWA programs. Until this rule is promulgated, the December 22, 1993, rule and its provisions will apply.

- How can a Federally recognized Tribe obtain authority to operate an NPDES and/or sewage sludge program?
- What EPA assistance is available to Tribes?

At the end of the handbook is a list of EPA sources and staff available to assist Tribes in applying for Treatment in a Similar Manner as a State and developing successful NPDES and/or sewage sludge programs.



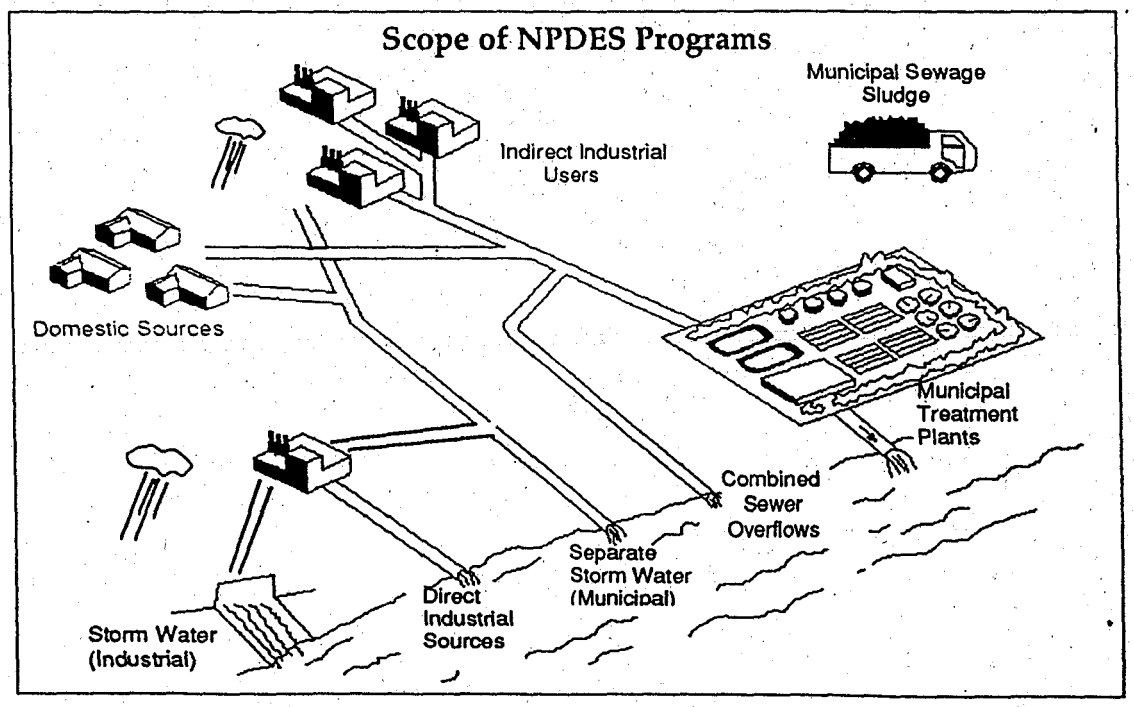
What Are the NPDES and Sewage Sludge Programs?

The CWA's goal is to restore and maintain the chemical, physical, and biological integrity of the nation's waters. To do that, several regulatory programs limit the amount and type of pollutants discharged into navigable waters, so that fish, shellfish, wildlife, and recreational opportunities are protected. Two of these programs are administered by EPA, or by authorized States and Federally recognized Tribes approved by EPA: the NPDES permit program and the National Sewage Sludge Program.

The process by which States or Federally recognized Tribes obtain EPA approval to operate an NPDES and/or sewage sludge program is known as "authorization." Authorization is discussed in detail on page 15 of this handbook.

The National Pollutant Discharge Elimination System (NPDES) Program

Established under CWA Section 402, the NPDES program regulates pollutant discharges from point sources to waters of the United States. "Point source" generally means the end of a pipe or ditch from which wastewater enters a stream, a lake, a river, or the ocean.



Under the NPDES program, EPA or authorized States and Tribes issue permits to:

- Wastewater treatment facilities,
- Industrial facilities,
- Mining operations, and
- Many animal feedlots.

NPDES permits include:

- Basic facility information and certification,
- Limits on chemical/biological contaminants in the effluent,
- Monitoring and reporting requirements, and
- Other special conditions necessary to protect the nation's waters.

The National Pretreatment Program

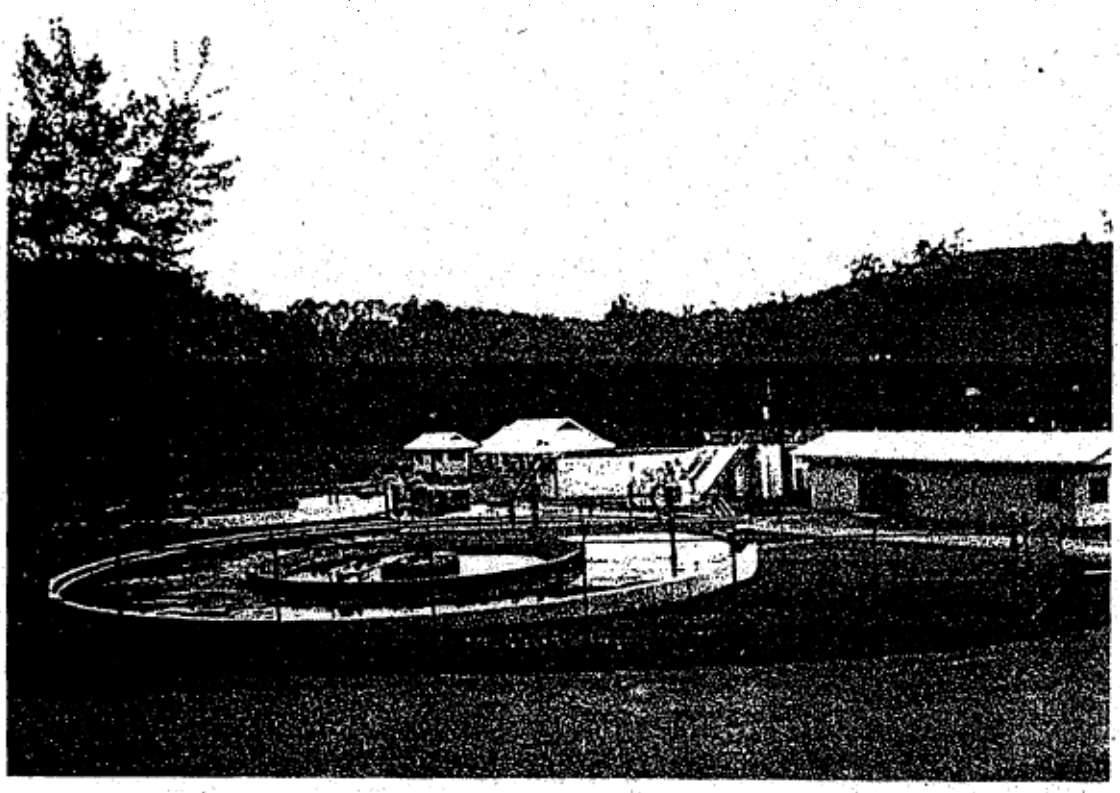
The National Pretreatment Program is the part of the NPDES program that regulates industrial discharges to municipal wastewater treatment works. Most treatment works cannot handle industrial wastes, which can interfere with treatment plant operations, or pass through the plant untreated and contaminate nearby water bodies. Because of this, significant industrial users who release wastewater into municipal treatment works must obtain pretreatment permits, which specify pollutant limits that must be met before wastewater can be discharged to a municipal treatment works.

The National Sewage Sludge Program

Generally, wastewater treatment separates the solid material from the liquid. The liquids are then treated and discharged as "effluent." The remaining solids are known as sewage sludge (or "biosolids"). Sewage sludge is typically:

- Applied to land (to fertilize crops or other vegetation or to stabilize the soil),
- Sent to a surface disposal site or municipal solid waste landfill, or
- Incinerated.

The National Sewage Sludge Program regulates the use and disposal of sewage sludge. Regulations under the program require sewage sludge to meet numeric pollutant limits, management practices, and requirements to reduce pathogens and attractiveness to nuisance vectors (such as insects and rodents) before it is used or disposed. Monitoring, recordkeeping, and reporting are also required.



In many cases, the sewage sludge use or disposal standards are included in NPDES permits or separate "sludge-only" permits issued to facilities that generate, treat, or dispose of sewage sludge. Facilities that do not have sewage sludge permits must comply with the standards directly.

The National Sewage Sludge Program also regulates the use or disposal of domestic septage (e.g., pumpings from a septic tank). Septage with a commercial or industrial component is not covered by the program. Septage placed on a surface disposal site must meet vector attraction reduction requirements, while septage applied to the land is subject to an annual application rate, pathogen reduction requirements, and vector attraction requirements. Septage haulers typically do not need to apply for permits, but must comply with the applicable regulations.

What Is a Permit and How Is It Developed, Issued, and Enforced?

In general, a permit sets conditions under which an activity that otherwise would be illegal is allowed. However, there is no right to a permit, and permits can be revoked for cause (e.g., noncompliance). An NPDES permit sets conditions and limits which, as long as they are met, make discharging pollutants legal. A "sludge-only" permit sets requirements for the use or disposal of sewage sludge. (NPDES permit limits are based on technology and/or water quality. Sewage sludge limits are generally risk-based.)

Technology-based NPDES Limits

Technology-based limits can consist of:

- Federal effluent limitation guidelines,
- State or Tribal regulations, and
- The Best Professional Judgment of the permit writer.

EPA has developed effluent limitation guidelines for certain classes of industry so that permits issued across the country have a uniform basis. States, localities, and authorized Tribes may impose stricter limits to attain or maintain the beneficial uses of the receiving water. In some cases where effluent limitations guidelines have not been developed and specific State/local/Tribal provisions do not apply, a permit writer may use Best Professional Judgment to determine appropriate permit limits. In any case, these limits cannot be less stringent than the Federal limits.

Water Quality-based NPDES Limits

Water quality-based limits are used when limits more stringent than technology-based effluent guidelines are necessary to protect a "designated use" of the receiving waters (40 CFR 122.44(d)(1)). Water quality-based limitations must control all pollutants which will cause, have the reasonable potential to cause, or contribute to a violation of any State or Tribal water quality standard (40 CFR 122.44(d)(1)(i)). Designated uses are usually established on a stream segment basis and may include such things as:

- Municipal water supply,
- Water contact recreation,
- Ground water recharge,

- Industrial process supply, or
- Wildlife habitat.

Sewage Sludge Limits

Sewage sludge permit limits are based on the requirements of Section 405 of the CWA. The standards for sewage sludge use or disposal are codified at 40 CFR Part 503. These requirements vary with the different sewage sludge use or disposal practices employed, but generally include limits on specific pollutants, pathogen and vector attraction reduction measures, and management practices. A State or Tribal sewage sludge program may be part of an approved NPDES program or a separate program. States and Tribes are free to set more stringent standards.

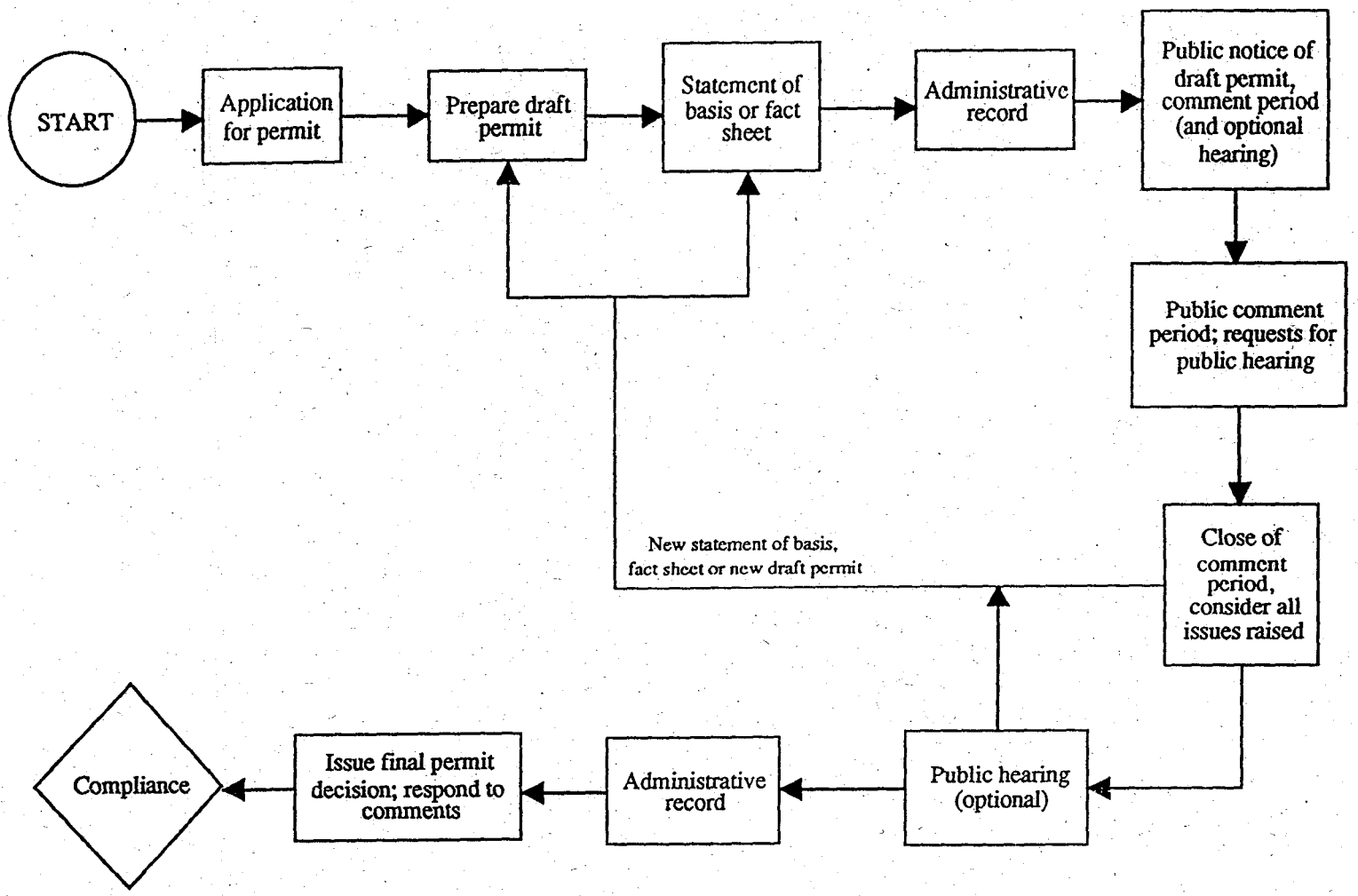
The Permit Issuance Process

The basic steps in the permitting process are:

- Application for a permit by the discharger or sewage sludge user or disposer,
- Development of the draft permit and fact sheet by EPA or the authorized State or Tribe,
- Notice to the public and period for public comments,
- Establishment of the Administrative Record,
- Award of final permit, and
- Compliance.

These steps are explained in greater detail on page 12. In addition, they are summarized in Figure 1 ("NPDES Permitting Procedures").

Figure 1: NPDES Permitting Procedures



Permit Application

All potential permittees must complete Form 1, a permit application that requests general information such as facility name, address, and ownership. Form 1 directs applicants to additional relevant application forms.

Development of Draft Permit and Fact Sheet

Once the application is submitted, EPA or the authorized State or Tribe must develop a draft permit and fact sheet. This draft permit must contain:

- A cover sheet,
- Pollutant limits for effluent or sewage sludge,
- Monitoring conditions,
- Standard conditions, and
- Any necessary special conditions.

The fact sheet typically explains the source of the pollutant limits and special conditions. For example, a fact sheet might cite the effluent limitations guidelines that apply to the class of permittee or the applicable Tribal water quality standard.

Monitoring conditions specify the analytical method, sample type, and frequency for sampling the effluent or sewage sludge to determine compliance with the permit limits.

Standard conditions appear in almost all permits; they usually include such things as reporting and records retention requirements.

Special conditions are additional conditions unique to certain dischargers.

Public Notice

The next step in the permitting process is public notice of the draft permit and a public comment period. Anyone who may be affected by the conditions of the permit has the opportunity to provide input to the permitting process. Generally, the public notice appears in the local newspaper, and the public comment period can last 30 to 90 days. Hearings may be held in response to public interest.

Administrative Record

The administrative record consists of all documents related to development of the permit, including:

- The draft permit,
- Copies of the applicable effluent limits or water quality standards,
- The comments raised during the public notice period, and
- Formal responses to the public comments received.

Final Permit

After considering the issues raised by the public comments, a final permit is issued to the applicant, which contains the information found in the draft permit and revisions made as a result of input received during the public notice and comment period.

Compliance

Once the final permit has been issued to the discharger, sewage sludge user, or disposer, the permittee must comply with the pollutant limits, monitoring and reporting requirements, and other specified conditions. It is then the responsibility of the permitting authority (EPA, authorized State, or authorized Tribe) to monitor the permittee's compliance. The permitting authority reviews the permittee's monitoring reports for accuracy and conducts periodic compliance inspections of the facility.

What Are the Roles of Federally Recognized Tribes In Administering NPDES and/or Sewage Sludge Programs?

There are two stages of requirements in assuming program administration responsibility:

- Those necessary to obtain authorization from EPA (such as satisfying §518 of the CWA), and
- Those performed after receiving authorization.

To achieve authorization, a Tribe must develop enforceable regulations for the NPDES (including pretreatment) or sewage sludge program. These regulations must be at least as strict as the Federal regulations. The Tribe must also develop a program to administer the NPDES and/or sewage sludge program before authorization is granted.

Once the Tribe receives authorization, it will be responsible for implementing the program (including issuing NPDES and/or sewage sludge permits). The authorized Tribe will also conduct compliance and monitoring activities.

Role of EPA

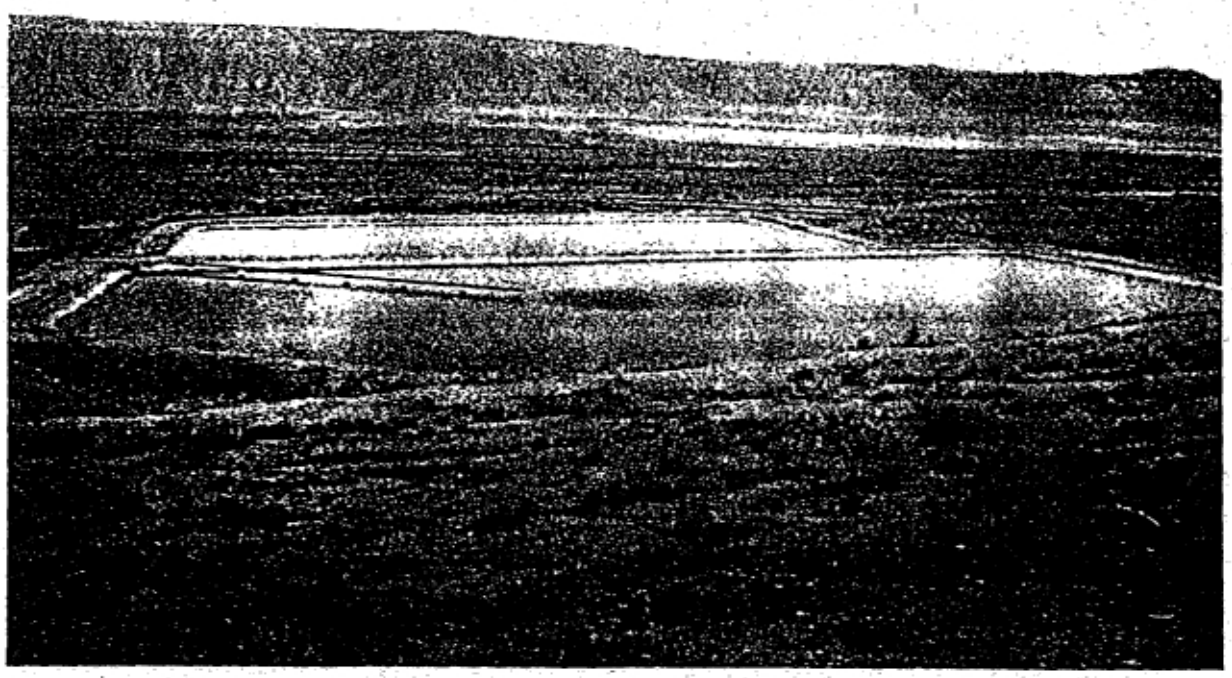
EPA's role changes as a Tribe assumes greater authority for the CWA programs on the reservation. Prior to authorization, EPA will:

- Issue permits,
- Conduct compliance and monitoring activities,
- Provide the necessary enforcement for the program, and
- Provide technical assistance and training to Tribes attempting to gain Treatment in a Similar Manner as a State.

After Tribal authorization, EPA will:

- Evaluate and oversee the Tribe's NPDES and/or sewage sludge program,
- Oversee grant programs (such as CWA §104(b)(3) and 106 grants), and
- Provide administrative and legal support and continued technical assistance and training.

EPA also will provide enforcement as necessary, according to a Memorandum of Agreement worked out between the Tribe and the EPA Region. Such EPA enforcement may be necessary in cases where Tribal authority is limited, such as for criminal enforcement actions.



What Are the Advantages and Disadvantages of Obtaining Authorization for NPDES and/or Sewage Sludge Programs?

EPA recognizes that it is important for Tribes to:

- Consider which environmental programs would be most beneficial, and
- Target Tribal efforts and resources towards those specific programs.

Major issues that Tribes should consider when deciding whether to apply for authorization include:

- The benefits of self-determination,
- Improved administrative, regulatory, and technical capabilities, and
- The costs in personnel and financial resources.

Self-Determination

Obtaining authorization to regulate reservation waters may support Tribal self-determination in several ways. For example, it gives the Tribe increased authority over what happens on its lands. The Tribe may impose its own water pollution control priorities by establishing Tribal regulations that are as (or more) stringent than Federal regulations. In addition, the Tribe will implement the program and carry out enforcement actions, as appropriate.

Administrative, Regulatory, and Technical Capabilities

Administering an NPDES and/or sewage sludge program provides important administrative, regulatory, and technical opportunities for a Tribe. The process of obtaining authorization to administer these programs will:

- Broaden the scope of government,
- Build institutional capabilities, and
- Increase the Tribe's experience in:
  - ✧ Developing and overseeing large programs, and
  - ✧ Implementing an information management system.

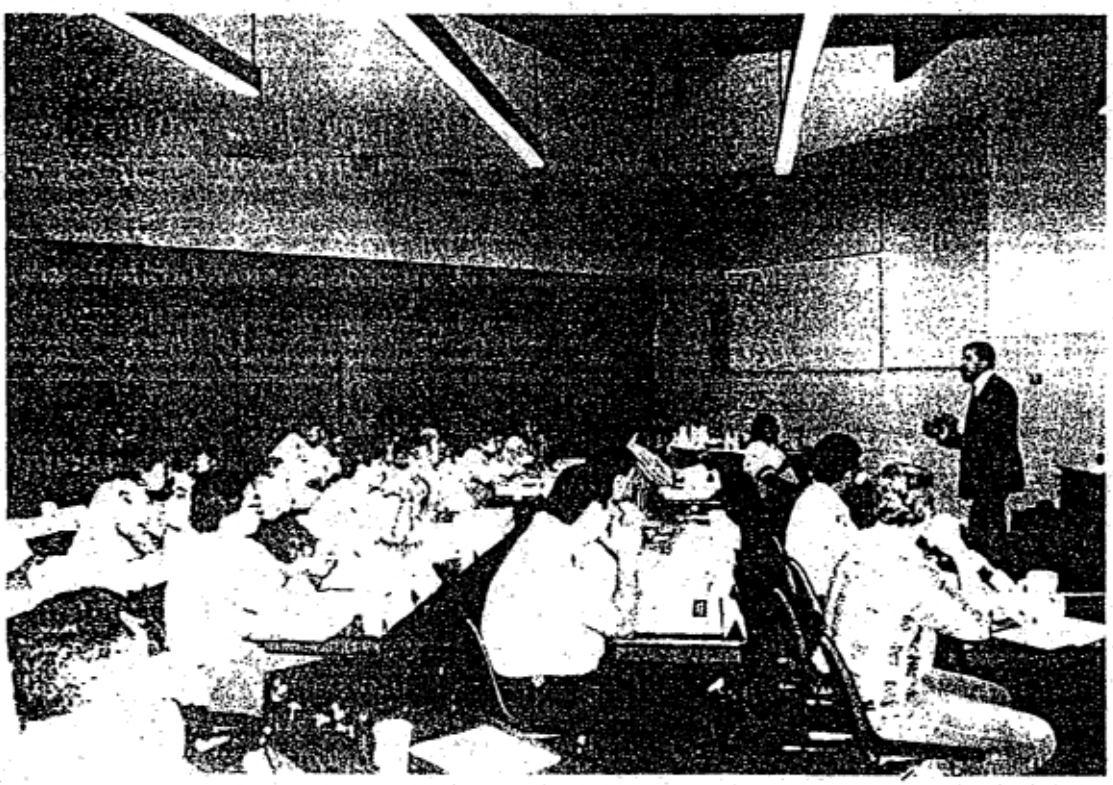
These programs will enable all members of the Tribe to gain an understanding of water pollution and other environmental issues.

Tribal authority also imposes administrative, regulatory, and technical burdens. For example, the Tribe must write necessary statutes and regulations. It may also need to create or expand an independent bureaucracy to establish and regulate the NPDES and/or sewage sludge program.

Tribal governments must ensure that regulatory and regulated entities are separate, in order to avoid conflicts of interest when the Tribe owns or operates a discharger or sewage sludge facility that would be regulated by the NPDES and/or sewage sludge program. Tribes may also have to provide training for engineers, attorneys, permit writers, and other specialists needed to manage effective and comprehensive programs.

Personnel and Financial Resources

Assuming responsibility for an NPDES and/or sewage sludge program may have material advantages for a Tribe. For example, it may generate revenue from permit fees and enforcement penalties. It may also attract or discourage certain industry on Tribal lands. Program authorization may also provide job opportunities for Tribal members.



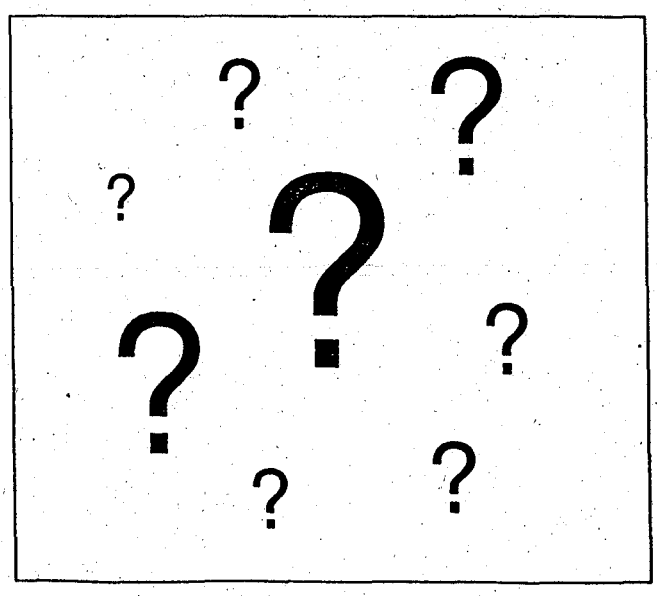
However, there may also be some disadvantages to program assumption. For example, program development entails certain costs, such as the labor cost to develop the initial submission and training costs for new personnel. In addition, program revenues will not necessarily cover program costs and also will not be available until after the program is implemented.

Questions to Ask

Applying for Treatment in a Similar Manner as a State and assuming authority for the NPDES and/or sewage sludge program is entirely voluntary. EPA recognizes that each Tribe must evaluate its own circumstances.

The following questions outline the major issues involved in seeking authorization and managing an effective NPDES and/or sewage sludge program. A Tribe's answers to these questions may highlight possible areas of concern before a Treatment in a Similar Manner as a State application is submitted or an NPDES and/or sewage sludge program is developed.

- Do the Tribe and its members want to expand the Tribal regulatory role and ability to protect public health and the environment?
- Does the Tribe have, or expect to develop, the necessary infrastructure, and is the Tribe prepared to promulgate comprehensive NPDES and/or sewage sludge regulations?
- Does the Tribe have the organizational ability to develop and maintain an independent regulatory body?
- Is the Tribe prepared to support this type of program for many years?
- Does the Tribe have, or plan to attain, the financial resources to support the development and continued operation of an NPDES and/or sewage sludge program?
  - ✧ Does the Tribe have the revenue to hire and train the staff necessary to run an NPDES and/or sewage sludge program?
  - ✧ Is the Tribe willing to commit to long-term financial support of the program?



When to Apply for Authorization

A Tribe should seek authorization if, after considering all of the benefits and costs, it has determined that authorization is in its best interest. Issues that should be considered include:

- The desire to further Tribal autonomy and self-determination,
- The ability to play a larger role in the protection of Tribal interests, and
- The strengthening of Tribal government.

At the same time, the Tribe must consider the need to develop and maintain the necessary components of running an NPDES and/or sewage sludge program. This may include:

- Researching current environmental statutes and regulations to determine how they will affect the NPDES and/or sewage sludge program and to identify program needs,
- Enacting new statutes and regulations,
- Creating or expanding an organization to run the program, and
- Hiring and training program personnel.

The Tribe must also consider the long-term financial support of the program. The decision to seek authorization is one that will have environmental and economic impacts for many years.

How Can a Federally Recognized Tribe Obtain Authority to Operate an NPDES and/or Sewage Sludge Program?

States (including Territories) and Tribes may acquire authority for the NPDES and/or sewage sludge programs under Sections 402(b), 405, and 518 of the CWA. To acquire this authority, a Tribe must:

- File for NPDES and/or sewage sludge Treatment in a Similar Manner as a State status. The Treatment in a Similar Manner as a State application can be filed simultaneously with an NPDES or sewage sludge program application. Tribes that have previously filed a successful Treatment in a Similar Manner as a State application for another CWA or Safe Drinking Water Act program may need only to update their approved Treatment in a Similar Manner as a State application.

- Develop necessary statutes and regulations, a program description, a Memorandum of Agreement, and an Attorney General's statement.

- After approval, receive authorization and fully implement the programs.

Treatment in a Similar Manner as a State Under the Clean Water Act

A Tribe must meet four criteria to be eligible for Treatment in a Similar Manner as a State:

- Existing substantial governmental duties and powers,

- Defined jurisdiction over water resources,

- Demonstrated Tribal capability, and

- Federal recognition by the U.S. Department of the Interior.

Federal Recognition

To receive Treatment in a Similar Manner as a State status, a Tribe must provide EPA with certification that it is recognized as a Tribe by the Department of the Interior. Any Tribe on the list of Federally recognized Tribes periodically published by the Secretary of the Interior satisfies this requirement. If a Tribe does not appear on the Secretary's list because the list has not been updated, the Tribe may provide appropriate documentation to verify to EPA that it is Federally recognized.

Substantial Governmental Duties and Powers

The Tribe must also demonstrate that it has a governing body and the ability to carry out the program for which it is seeking authorization. EPA defines "substantial governmental duties and powers" to mean that the Tribe is currently performing governmental functions to promote the public health, safety, and welfare within a defined geographical area. The Tribe may demonstrate this by submitting a narrative statement that:

- Describes the form of Tribal government,
- Describes the essential governmental functions performed (such as levying taxes and exercising police power), and
- Identifies the legal authority for performing these functions (e.g., the Tribal constitution).

Jurisdiction Over Water Resources

The Tribe must further demonstrate legal jurisdiction over water resources. In general, these water resources will be located on Tribal lands, but may, in some instances, include those on trust land set apart for use by American Indians. EPA suggests that Tribes, in their Attorney General statements, outline all bases for concluding that the Tribe has adequate authority to regulate all claimed water resources under the CWA.

Tribal Capability

Finally, the Tribe must demonstrate that it is capable of effectively implementing the program in a manner consistent with the terms and purposes of the CWA and applicable regulations.

The five factors that EPA will consider when evaluating a Tribe's demonstration of capability are:

- The Tribe's previous management experience,
- Existing environmental or public health programs it administers,
- Existing mechanism(s) to carry out the executive, legislative, and judicial functions of the Tribal government,
- The relationship between regulated entities and the administrative agency.

of the Tribal government designated as the primacy agency, and

- The technical and administrative capabilities of the staff to administer and manage the program.

Tribes should note that this demonstration does not change the traditional requirement for assumption of an NPDES and/or sewage sludge program that the program be fully effective at the time of approval.

If a Tribe satisfies these criteria and is found eligible for Treatment in a Similar Manner as a State, the Tribe is eligible to assume NPDES and/or sewage sludge program authority. All applicants for NPDES and/or sewage sludge program authorization, including States and Tribes, must meet applicable NPDES and/or sewage sludge program regulatory requirements.

NPDES and/or Sewage Sludge Program Development

To develop an NPDES and/or sewage sludge program, a Tribe must:

- Adopt Tribal legal authority (statutes and regulations) that meets the minimum Federal requirements, and
- Establish procedures to implement these authorities.

Because Tribal criminal authority is restricted by Federal law, Tribes are not required to have comprehensive criminal enforcement capabilities. (The rule establishing requirements for Tribes to be Treated in a Similar Manner as States includes provisions requiring a Tribe to refer criminal enforcement matters to the EPA Regional Administrator in a timely and appropriate manner when Tribal enforcement authority does not exist.)

A Tribe must also develop capabilities to implement the program. These may include:

- Providing training for engineers and permit writers, or
- Sending such personnel to EPA- or State-sponsored training courses.

Program development may also include establishing a separate administrative agency in order to ensure that a conflict of interest does not arise between dischargers or sewage sludge users or disposers and the regulating agency.

Procedure for Applying for NPDES and/or Sewage Sludge Program Authorization

Tribes must submit a program request to EPA for approval. The submittal must include:

- A letter from the Tribe to EPA requesting authorization,
- A complete program description which explains program operation and covers, for example:
  - ✧ Routine administrative procedures and operation of the scope, structure, coverage, and processes of the program,
  - ✧ A list of agencies which will have responsibility for administering the program and their organizational charts and jurisdiction,
  - ✧ A list of the staff who will administer the program, including the number of employees, occupations, and general duties of the staff,
  - ✧ A workload analysis that estimates the administrative and technical costs of the program for its first two years,
  - ✧ A description of the sources of funding for the first two years of the program, including any estimate of Federal funding,
  - ✧ Copies of sample permits, applications, and reporting forms, and
  - ✧ Descriptions of applicable Tribal regulations or laws which address the procedures for permitting, administrative and judicial review, compliance, and enforcement of NPDES and/or sewage sludge program permits.
- Copies of applicable Tribal statutes and regulations,
- A signed Memorandum of Agreement with the Regional Administrator concerning cooperative program responsibilities, and
- A certification from the Tribal Attorney General (or equivalent) that the Tribe has adequate legal authority to administer the program.

What Assistance Is Available to Tribes?

EPA will provide technical assistance to Tribes interested in obtaining authorization or desiring more information about the NPDES and/or sewage sludge programs. Types of available assistance include:

- Regulation development support,
- Guidance on program submittals,
- Sample Treatment in a Similar Manner as a State packages, and
- EPA Regional and Headquarters NPDES and Sewage Sludge Program Coordinators.

Regulation development support includes:

- Samples of appropriate language for Tribal NPDES and/or sewage sludge programs,
- A technical review by EPA personnel of proposed Tribal statutes and regulations, and

EPA Regional and Headquarters NPDES Program Coordinators

Region	Coordinator		
Region I (CT, ME, MA, NH, RI, VT)	Doug Corb	617-565-3519	Water Management Division, Wastewater Management Branch
Region II (NJ, NY, PR, VI)	Phil Sweeney	212-264-2911	Water Management Division, Water Permits and Compliance Branch
Region III (DE,DC, MD,PA,VA,WV)	Ken Cox	215-597-8211	Water Management Division, Permits Enforcement Branch
Region IV (AL, FL, GA, KY, MS, NC, SC, TN)	Jim Patrick	404-347-3012	Water Management Division, Permits Section
Region V (IL, IN, MI, MN, OH, WI)	Claudia Johnson-Schultz	312-886-6108	Water Division
Region VI (AR, LA, NM, OK, TX)	Jayne Fontenot	214-655-7190	Water Management Division, NPDES Permits Branch
Region VII (IA, KS, MO, NE)	Don Toensing	913-551-7446	Water Management Division, Water Compliance Branch
Region VIII (CO, MT, ND, SD, UT,WY)	Janet Lacombe	303-293-1593	Water Management Division, NPDES Branch
Region IX (AZ, CA, HI, NV, AS, GU)	Terry Oda	415-744-1923	Water Management Division, Permits and Compliance Branch
Region X (AK, ID, OR, WA)	Linda Liu	206-553-1447	Water Division, Wastewater Management and Enforcement Branch
EPA Headquarters	Laura Phillips	202-260-9522	Office of Wastewater Management, NPDES Program Branch

- In some cases, on-site support from EPA personnel.

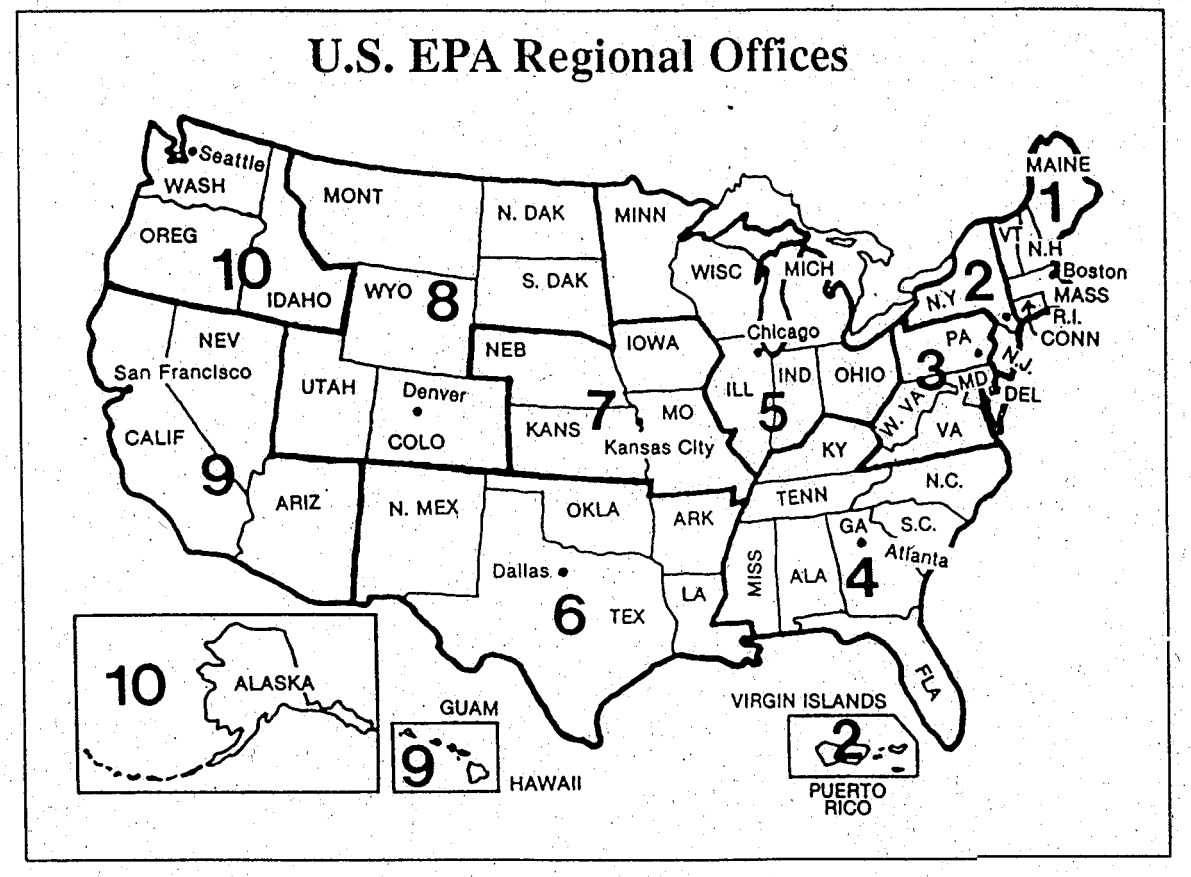
EPA will also provide guidance on program submittals. For example, EPA could provide Tribes with examples of successful program submittals from small States. In addition, EPA can provide sample Treatment in a Similar Manner as a State applications.

The EPA Regional and Headquarters NPDES and Sewage Sludge Program Coordinators are also available to answer questions about the programs.

In addition, EPA has developed several guidance documents on the NPDES and sewage sludge programs. Information on obtaining these documents is explained on page 31.

EPA Regional and Headquarters Sewage Sludge Program Coordinators

Region	Coordinator		
Region I (CT, ME, MA, NH, RI, VT)	Thelma Hamilton	617-565-3569	Water Management Division, Municipal Evaluation Section
Region II (NJ, NY, PR, VI)	Alia Roufaeal	212-264-8663	Water Management Division
Region III (DE,DC, MD,PA,VA,WV)	Ann Carkhuff	215-597-9406	Water Management Division, Permits Enforcement Branch
Region IV (AL, FL, GA, KY, MS, NC, SC, TN)	Vince Miller	404-347-2391	Water Management Division, Municipal Facilities Branch
Region V (IL, IN, MI, MN, OH, WI)	Ash Sajjad	312-886-6112	Water Division, Water Quality Branch
Region VI (AR, LA, NM, OK, TX)	Stephanie Kordzi	214-655-7520	Water Management Division
Region VII (IA, KS, MO, NE)	John Dunn	913-551-7594	Water Management Division, Water Compliance Branch
Region VIII (CO, MT, ND, SD, UT,WY)	Bob Brobst	303-293-1627	Water Management Division, NPDES Branch
Region IX (AZ, CA, HI, NV, AS, GU)	Lauren Fondahl	415-744-1909	Water Management Division, Pretreatment Section
Region X (AK, ID, OR, WA)	Dick Hetherington	206-553-1941	Water Division, Wastewater Management and Enforcement Branch
EPA Headquarters	Wendy Bell	202-260-9534	Office of Wastewater Management, Pretreatment and Multi-media Branch



U.S. EPA Region 1:	JFK Federal Building, One Congress Street, Boston, MA 02203
U.S. EPA Region 2:	26 Federal Plaza, New York, NY 10278
U.S. EPA Region 3:	841 Chestnut Building, Philadelphia, PA 19107
U.S. EPA Region 4:	345 Courtland St., N.E., Atlanta, GA 30365
U.S. EPA Region 5:	77 West Jackson Blvd., Chicago, IL 60604-3507
U.S. EPA Region 6:	1445 Ross Ave., Suite 1200, Dallas, TX 75202-2733
U.S. EPA Region 7:	726 Minnesota Ave., Kansas City, KS 66101
U.S. EPA Region 8:	999 18th Street, Suite 500, Denver, CO 80202-2405
U.S. EPA Region 9:	75 Hawthorne St., San Francisco, CA 94105
U.S. EPA Region 10:	1200 Sixth Ave., Seattle, WA 98101

Additional Resources

Unless otherwise indicated, to obtain a copy of the following documents, first contact the EPA Office of Water Resource Center at the telephone number and address listed below. If the document is not available from the Resource Center, then contact your Regional NPDES or Sewage Sludge Program Coordinator (listed on pages 27 and 28).

Office of Water Resource Center
U.S. Environmental Protection Agency
Mail Code 4100
401 M Street, SW
Washington, DC 20460
(202)260-7786

NPDES Program

- NPDES State Program Guidance (July 1986)
- Training Manual for NPDES Permit Writers (January 1993)
- Overview of the Storm Water Program (March 1993)
- NPDES Storm Water Program: Question and Answer Document, Volume 1 (Also available from National Technical Information Service (NTIS), 1-800-553-6847; and from Education Resources Information Center (ERIC), (614)292-6717), (EPA/833/F-93-002), (March 1992)
- NPDES Storm Water Program: Question and Answer Document, Volume 2 (Also available from NTIS and ERIC), (EPA/833/F-93-002B), (July 1993)
- EPA's Enforcement Management System (1989)
- Implementing State/Federal Partnerships in Enforcement (June 1984)
- Quarterly Non-Compliance Report (QNCR) Guidance (March 1986)

- NPDES Compliance and Inspection Manual (May 1988)

Pretreatment Program

- Guidance on Development of Enforcement Response Plan (ERP) (September 1989)
- Industrial User Inspections/Sampling Manual for POTWs (April 1994)
- Industrial User Permitting Guidance Manual (Also available from NTIS and ERIC), (EPA/833/R-89-001), (1990)
- Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program (Also available from NTIS and ERIC), (EPA/833/B-87-202), (1987)

The National Sewage Sludge Program

- Part 503 Information Packet (Also available from National Small Flows Clearinghouse (NSFC) #WWPCGN5O, 1-800-624-8301), (1994)
- Sludge Compliance and Enforcement Strategy (Contact Regional Coordinator), (May 1993)
- Environmental Regulations and Technology: Control of Pathogens and Vector Attractions in Sewage Sludge (Also available from Center for Environmental Research Information (CERI), (513)569-7562), (EPA/625/R-92/013), (December 1992)
- POTW Sludge Sampling and Analysis Guidance Document (Only available from NTIS, PB #93-227957), (August 1989)
- A Plain English Guide to the EPA Part 503 Biosolids Rule (July 1994)

- Preparing Sewage Sludge for Land Application or Surface Disposal: A Guide for Preparers of Sewage Sludge on the Monitoring, Recordkeeping, and Reporting Requirements of the Federal Standards for the Use or Disposal of Sewage Sludge, 40 CFR Part 503 (Also available from NSFC and NTIS)

- Surface Disposal of Sewage Sludge: A Guide for Owners/Operators of Surface Disposal Facilities on the Monitoring, Recordkeeping, and Notification Requirements of the Federal Standards for the Use or Disposal of Sewage Sludge, 40 CFR Part 503 (June 1994)

- Land Application of Sewage Sludge: A Guide for Land Appliers on the Recordkeeping and Notification Requirements of the Federal Standards for the Use or Disposal of Sewage Sludge, 40 CFR Part 503 (July 1994)

- Domestic Septage Regulatory Guidance: A Guide to the EPA Part 503 Rule (Also available from NSFC, NTIS, and ERIC)

- State Sludge Management Program Guidance Manual (October 1990)

Indian-Specific Policy

- EPA Indian Policy (July 1984 and November 1984)

- Interim Guidance on Review of Indian Lands - Enforcement Actions (October 1992)