Appendix B. Pre-Approved Document Types

The documents are grouped, based on the need type that they are most commonly used to support, into the following five sections: (1) Documents with no specific emphasis; (2) wastewater treatment; (3) non-point source (NPS); (4) stormwater; and (5) small communities. The grouping is to ease the documentation process and is not meant to limit which types of documents can be used for which type of need.

The document descriptions include:

- Document Name
- Updated CWNS 2008 document number in parenthesis **(#)**
- Legacy (CWNS 2004) document numbers in brackets *[#]*
- An indication of whether or not the document can be used to justify needs (demonstrate a water-quality or water related public health problem) and/or costs.
- An indication of whether or not the document type is footnotable. Footnotable documents do not need to be sent to EPA for review and are retained in the state's files. To be footnotable, the document type must (1) say "yes" next to Footnotable and (2) be for a facility/project that has total needs of less than $20 million (2008 dollars).
- The percentage of the needs that were justified with the document type in 2004.
- A description of the document type, which may include specific information for some needs categories.
- In some cases, suggestions for related document types that may provide needs or costs justifications

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Documents with no specific emphasis on the type of need

Intended Use Plan (01) *[8, 11]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: 4.7*

The Intended Use Plan (IUP), which is prepared annually, uses state-assigned criteria to rank projects for which federal funding assistance is being sought during the current federal fiscal year. The primary purpose of the IUP is to identify proposed annual intended uses of the Clean Water State Revolving Fund (CWSRF) money. A section 212 project listed in the IUP must be on the State Priority List to be eligible for CWSRF funding. A section 319 or 320 activity is not required to be on the State Priority List unless the activity is considered to be "nontraditional" NPS pursuant to the Funding Framework. However, such activities must be listed on a state's IUP for funding to occur.

For CWNS, some states need to consider only their most recent IUP, because their states roll unfunded projects from previous IUPs forward to the most current IUP. Other states need to consider several IUPs, because unfunded projects are not rolled forward but are still considered active. States may use any IUP that EPA has accepted since the close of data collection for the previous CWNS Report to Congress (February 18, 2005 for CWNS 2008) to document need and cost (with the exception of project refinancing or set-asides) if the need still exists as of January 1, 2008 and the information is current. States must contact EPA before using IUPs accepted by EPA before February 18, 2005, and they will be considered on a case-by-case basis. For states that voluntarily use an Integrated Planning and Priority Setting System (IPPS), only the portion of the document that

presents the separate IUP exhibit should be considered an IUP for purposes of the CWNS. If the full scope of the project is to be funded over several years, the total amount should be entered for costs.

State and Federal Loan and Grant Applications (02) *[10, 28]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: N/A*

Federal or equivalent state grant applications may be used to document needs and to update costs for the categories for which the grant or loan money is requested. Applications should contain a clearly written narrative that defines the specific project and the water quality or public health problem. The application's supporting documentation must be submitted. Examples are EPA's 319 Nonpoint Source Grants, Housing and Urban Development's (HUD) Community Development Block Grant, and Rural Utilities Service funding.

Loan and grant application forms are acceptable **for documenting need** if the form and/or supporting materials contain the following minimum elements:

- Signatures (same rules as Document Type 71)
- Costs, by Needs Category
- Description of needs and project benefits
- Time horizon of needs
- Contact information (same as Document Type 71)
- Population estimates for wastewater treatment projects (same as Document Type 71)
- A local government official's signature ("Local" means city, community, town, borough, village, township, parish, or county.). A local government official does not mean just the elected representative (e.g., Mayor); it can be any other qualified official (e.g., public works manager)

Grant and loan applications are acceptable **for documenting cost** if a cost estimate prepared and signed by an engineer or engineer circuit rider is attached. The cost estimate must include the engineer's rationale for the estimate; it need not be as detailed as that found in a facility plan.

If the grant or loan application package includes a Final Engineer's Estimate (23), Preliminary Engineer's Estimate (22), Facility Plan (21), or other of the pre-approved documents, the costs should be entered under these other document categories and not as Document Type 02.

CWSRF Loan Applications (03) *[10]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: N/A*

CWSRF applications may be used to document needs and costs for the categories for which the loan money is requested. Applications should contain a clearly written narrative that defines the specific project and the water quality or public health problem.

Non-governmental Grant Applications (04) *[10]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: N/A*

Grant applications written to non-governmental organizations may be used to document needs and to update costs for the categories for which the grant money is requested. The applicant can be either a local government or a non-governmental organization. Applications should contain clearly written narrative that defines the specific project and the water quality or public health problem. All supporting documentation to the grant application must be submitted. Some examples are applications to foundations and other non-governmental funders at the local, state (e.g., Maryland's Chesapeake

Bay Trust), regional (e.g., Charles Stewart Mott Foundation), and national level (e.g., National Fish and Wildlife Foundation).

Grant application forms are acceptable **for documenting need** if the form or supporting materials contain the following minimum elements:

- Signatures (same rules as Document Type 71)
- Costs, by Needs Category
- Description of needs and project benefits
- Time horizon of needs
- Contact information (same as Document Type 71)
- Population estimates for wastewater treatment projects only (same as Document Type 71)
- For applications submitted by local governments: The signature of a local government official. ("Local" means city, community, town, borough, village, township, parish, or county.). A local government official does not mean just the elected representative (e.g., Mayor); it can be any other qualified official (e.g., public works manager)
- For applications submitted by non-governmental organizations: The signature of a local government official (any qualified official at the city, community, town, borough, village, township, parish, or county level) is required for wastewater treatment projects.

Grant applications are acceptable **for documenting cost** if a cost estimate that has been prepared and signed by an engineer or engineer circuit rider is attached. The cost estimate need not be as detailed as that found in a facility plan, but it must include the engineer's rationale for the estimate.

If the grant or loan application package includes a Final Engineer's Estimate, a Preliminary Engineer's Estimate, a Facility plans, or other of the pre-approved documents, the costs should be entered under these other document categories and not as Document Type 02.

Cost of Previous Comparable Construction (05) *[5]*
Need: No *Costs: Yes* *Footnotable: No* *% 2004 needs: 3.0*

This document type can be used to justify costs but not needs. The approach used to create each document **must be pre-approved by EPA Region & headquarters before entering the information into the system.**

This estimate of cost must be based on at least three projects that:

- Were bid or completed within the last two years
- Are similar in size, scope, and geographic area (e.g., county, watershed). The size of the project (e.g., population served, pipe lengths, flow treated) must be within plus or minus 25 percent of the size of the sample. Generally, projects should be in the same county or watershed. In some cases, it may be appropriate to use Document Type 05 to determine costs for larger geographic areas (e.g. region, state).
- Have detailed construction cost data are available.

The document date entered in the system should be the date when EPA headquarters approved the use of the document. The base date should be the date the state judges to be the best fit for the group of documents that are being used. Note: Some adjustments might be needed during the Review Process. Ideally, the base date should be the date of one of the documents used for the analysis.

Depending on the Category of cost, certain specific rules apply to the use of Document Type 05. The specific rules are presented below:

- Categories I and II: The flow treated should be within plus or minus 25 percent of the size of the sample.

- Categories III and IV needs documented with pipe lengths/replacement rates: For each combination of pipe type/grade, a comparative cost estimate must have well documented costs per unit length for each type/grade combination used in the sample. For these categories the soil conditions of the project must be approximately the same as those for the sample

- Category V: Document Type 05 cannot be used to justify category V needs.

- Category VI: The size of the Best Management Practices (BMPs) must be within plus or minus 25 percent of the size of the sample.

- Category VII: Extrapolating will be permitted for estimating BMPs in reasonably analogous watersheds (e.g., similar land use, weather patterns, and/or hydrology) and in areas with a reasonably analogous pollution sources (e.g., grazing, abandoned mine drainage) requiring the same BMPs. Proportional extrapolations of costs (i.e., if the cost to implement a program in a 10,000 acres watershed is $1,000,000 then the cost in a 20,000 acres watershed must be $2,000,000) are only acceptable if they are for the implementation of a specific solution that is directly related to areas, for example acquisition of easements, conservation tillage, nutrient management on agriculture fields, or riparian buffers.

- Category X: The flow treated should be within plus or minus 25 percent of the size of the sample.

- Category XII: Same rules as Category VII apply.

State-Approved Area-wide or Regional Basin Plan (06) *[9]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: 7.8*

Clean Water Act section 208 and 303(e) Regional Basin Plans are broad-based water quality management plans written primarily to identify future planning for areas within a state. These reports study large areas such as basins or counties and usually recommend general solutions to current or anticipated wastewater needs within the planning area. Only section 208 and 303(e) documents that contain site-specific information and a description of a need may be accepted as documentation of need. Documentation of cost is assessed on a case-by-case basis depending on the amount of detail reported and the source of the information.

State-Approved Local Comprehensive Water and Sewer Plan (07) *[15]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: 1.1*

These plans are similar to State-Approved Area-wide Basin Plans (06). These local plans also cover fairly large areas and might not contain project-specific information. The plans must clearly identify a water quality or health-related problem and must be project-specific to be acceptable as documentation.

Total Maximum Daily Load (TMDL) (08) *[18]*
Need: Yes *Costs: No (With exceptions)* *Footnotable: No* *% 2004 needs: <0.1*

A TMDL is an estimation of the maximum amount of a pollutant that an impaired waterbody (listed on a state's 303(d) list) can receive and still meet water quality standards. It includes an allocation of the allowable pollutant discharge amount from different point and NPS. Project-specific needs should be identified.

TMDL Reports or TMDL Implementation Plans containing cost data will be reviewed on a case-by-case basis. Costs reported in TMDL implementation plans are usually estimated by (1) identifying/quantifying the corrective actions that are needed; (2) researching the unit costs; and (3) multiplying the unit cost by the number of units required. Only costs reported in the TMDL implementation plans should be assigned to this document type.

A good example of an implementation plan with acceptable cost information is the Portneuf River Total Maximum Daily Load Agricultural Implementation Plan. See table A-9. http://www.deq.state.id.us/water/data_reports/surface_water/tmdls/portneuf_river/portneuf_river_implementation_plan_entire.pdf

National Estuary Program Comprehensive Conservation and Management Plan (09) *[27]*

Need: Yes *Costs: No (With exceptions)* *Footnotable: No* *% 2004 needs: 0.3*

A Comprehensive Conservation and Management Plan (CCMP) is a management plan developed for an estuary that has been nominated for the CWA section 320 National Estuary Program (NEP). The CCMP summarizes findings, determines environmental quality goals and objectives, identifies and establishes priorities for addressing problems, identifies action plans and compliance schedules for pollution control and resource management, and ensures that designated uses of the estuary are protected.

CCMPs are developed by the twenty-eight estuaries (in eighteen states and Puerto Rico) in the NEP. All 28 CCMPS have been completed and approved by EPA; some NEPs are revisiting and updating their CCMPs. They vary in format and detail and can be used by states to document needs, particularly non-point source needs. Some of the CCMPs are posted at: http://www.epa.gov/owow/estuaries/list.htm

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23).

Nutrient Criteria Studies (10) *[n/a]*

Need: Yes *Cost: No* *Footnotable: No*

Clean Water Act Section 304(a) directs EPA to develop scientific information on pollutants and to publish "criteria guidance." The criteria guidance, often expressed as pollutant concentration levels, will result in attainment of the state's designated use for the waterbody (e.g. fishing, swimming). These concentration levels generally are the same for all types of waterbodies nationwide. States consider these EPA "criteria guidance" when they adopt water quality standards for waterbodies. A water quality standard commonly includes a designated use for the waterbody and criteria (i.e. concentration levels) for a range of pollutants that will assure that the waterbody will support the designated use.

In the case of nutrients, however, there is a great deal of variability in inherent nutrient levels and nutrient responses throughout the country. This natural variability is due to differences in geology,

climate, and waterbody type. Because of this variation, EPA's custom of developing scientific information about a pollutant and recommending a single pollutant concentration number to support a designated use for nationwide application is not appropriate for nutrients. EPA believes that distinct geographic regions and types of waterbodies need to be evaluated differently and that recommended nutrient concentration levels need to reflect geographic variation and waterbody types.

EPA requires states develop nutrient criteria plans for incorporation into their water quality standards development efforts. In many cases, these studies contain description of water quality problems that can be used to justify a need.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23).

Impaired Waters or TMDL Listing (11) *[n/a]*
Need: Yes *Costs: No* *Footnotable: N/A* *% 2004 needs: --*

EPA maintains a database of impaired waters and impaired waters with Total Maximum Daily Loads (TMDLs). Facilities/projects discharging into impaired waters can justify their needs if the projects specifically address the pollutant causing the impairment. Within the data entry system, states will directly link the facilities/projects to the database of impaired waters based on the discharge location (i.e., receiving water). There will be no need to submit documentation; a valid link fulfills the need justification requirements.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23).

State Needs Surveys & other State forms (12) *[29, S2]*
Need: Yes *Costs: No (with exceptions)* *Footnotable: Yes* *% 2004 needs: 0.2*

States must send state-specific forms (document type 12) to the EPA Regional CWNS Coordinator and EPA headquarters for approval prior to using these forms for data collection.

State forms are acceptable **for documenting need** if they contain the following minimum elements:

- Costs, by Needs Category
- Description of Needs & Project Benefits
- Time Horizon of Needs
- Contact Information (same as Doc Type 71)
- Population Estimates (same as Doc Type 71)
- A local government official's signature to certify that the community has the water quality needs described in the form. ("Local" means city, community, town, borough, village, township, parish, or county.). A local government official does not mean just the elected representative (e.g., Mayor); it can be any other qualified official (e.g., public works manager)

For communities with populations of fewer than 10,000 persons, State Need Surveys are acceptable **for documenting cost** if a cost estimate that has been prepared and signed by an engineer or engineer circuit rider is attached and **other acceptable documentation types are not available**. The cost

estimate need not be as detailed as that found in a facility plan, but it must include the engineer's rationale for the estimate.

For specific communities with populations of 3,500 or less and under extraordinary circumstances, states may apply to EPA headquarters for pre-approval on ability for a state registered engineer (PE) or circuit rider to sign the cost or need justification for document type 12. States should send written statements to EPA headquarters with the community's details and why local signatures are not available. Requests to EPA headquarters should be done individually for each community. States should wait until EPA headquarters approves the request before entering needs or cost information into the database.

EPA-headquarters Approved (99) *[99]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: 3.9*

Unique documents require special headquarters approval. If a document meets all criteria but is not listed as a Pre-Approved Document, States may send at least two examples to their EPA Regional CWNS Coordinator for review prior to data entry. If the EPA Regional CWNS Coordinator believes that the documents might be acceptable, he or she will forward them to EPA headquarters for final determination.

Documents with Emphasis on Wastewater Treatment Needs

Capital Improvement Plan (CIP) (20) *[1]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: 37.3*

A CIP, sometimes referred to as a Master Plan, is a fiscal planning document used by local governments (e.g., authorities, cities, counties, districts) designed to anticipate capital improvement projects or equipment and schedule them over a period of time. The planning period of CIPs can span from 1 to 20 years. Most CIPs contain project- and cost-specific information.

A CIP is an acceptable form of documentation to justify a need and the appropriate project-specific costs. However, they can only be used to justify a need if the document addresses why the project is needed. When using CIPs to justify needs, keep the following items in mind:

- Inclusion in a CIP is not by itself a justification for need. If the CIP does not contain a satisfactory description of an existing problem, additional documentation to support such need should be provided with associated costs in order to justify need and cost.
- Some CIPs include projects needed as a result of projected growth. Projected growth can only be used to justify need when the existing treatment plant, collection system or pollution control system cannot handle either the projected capacity or meet the required treatment levels.
- CIPs frequently describe areawide projects with little specific detail, which makes the assignment of the correct needs category difficult.

Facility Plan (21) *[6]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: 15.3*

The Facility Plan contains project-specific information. Typically several alternatives are presented, including one recommended alternative.

Only information covering the recommended alternative may be used to document a need and a cost estimate. Also, the funding status of the project should be checked to make sure that the need has not already been satisfied.

Preliminary Engineer's Estimate (22) *[7]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: N/A*

Preliminary Engineer's Estimate is a preliminary engineering study to assess the scope and feasibility of the project before more detailed planning occurs. This documentation type encompasses documents ranging from a memo to a formal Engineer's Preliminary Estimate or Engineer's Preliminary Study. As long as the need is project-specific and the document identifies a current problem, the document is acceptable.

The Preliminary Engineer's Estimate document must be an official project description that precedes a facility plan or a Final Engineer's Estimate.

Final Engineer's Estimate (23) *[4]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: 5.1*

A Final Engineer's Estimate contains a specific description of the project scope and a list of work to be done, along with detailed itemized costs.

Note that this document is not the same as a Preliminary Engineer's Estimate. A Final Engineer's Estimate is an excellent source of accurate cost information. The Final Engineer's Estimate is typically submitted as a result of detailed facility design. Lowest responsive, responsible bids are equivalent to Final Engineer's Estimates.

Sewer System Evaluation Documents (24) *[2, 3, 16]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: 0.9*

Sewer System Evaluation Documents include Infiltration/Inflow (I/I) Analysis and Sewer System Evaluation Survey (SSES).

An I/I Analysis is a document that identifies excessive flow problems due to infiltration or inflow into the sewerage. The problems are usually identified by the use of television inspection of the sewer, smoke testing, flow metering, or physical survey. The recommendations section of the report should be checked to determine the recommended solution to the problem. In some cases, the report might recommend a "no action" alternative, because it is more cost-effective not to correct the excessive I/I problem. In such cases, no costs would be reported from this document but could still be reported from other documents. The I/I Analysis may be contained within a Facility Plan, a Sewer System Evaluation Survey, or a Combined Sewer Overflow Report; if that is the case, it should be reported under these documents and not as Document Type 24.

An SSES is a document that contains the results of a sewer system survey, manhole inspection, smoke testing, and flow monitoring. It is used to evaluate the physical condition of a sewer system and identifies areas of combined sewers, downspout connections, and locations where the sewer system is at capacity. Recommendations may include replacing areas with larger-diameter pipe, grouting joints, and separating sewers in areas of combined sewers. In many cases a combined ewer overflow (CSO) study is placed in this category. This is appropriate unless it is a CSO Long Term Control Plan (LTCP) which has its own document categories (Document Types 32 and 33).

Diagnostic Evaluation (25) *[12]*
Need: Yes *Costs: No* *Footnotable: No* *% 2004 needs: <0.1*

A diagnostic evaluation is usually performed when a facility cannot achieve effluent discharge permit limits or when it experiences design, operational, analytical, or financial problems that limit the performance of the facility. This type of evaluation may be used to document a need if the results indicate that construction is necessary to achieve compliance. Operation and maintenance (O&M) related problems do not document a need.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23).

Sanitary Survey (26) *[14]*
Need: Yes *Costs: No* *Footnotable: No* *% 2004 needs: 0.1*

A sanitary survey is a logical, investigative approach to gather information to evaluate the condition of existing Onsite Wastewater Treatment Systems (OWTS). These surveys are performed to document the condition of existing OWTS for facility planning purposes and to locate sources of water pollution and public health problems.

The sanitary survey must document high, areawide failure rates that are considered serious enough to be a health hazard (such as ground water contamination caused by malfunctioning OWTSs) in order to document a need. The documentation must clearly state that OWTS failures are contributing to a water pollution or health-related problem. The fact that an area has soils unsuitable for OWTSs does **not** document the need for sewers or a treatment plant. **Communities with populations of fewer than 10,000 persons are able to use a letter from a registered state or county Sanitarian or Professional Engineer with documentation or other evidence of a site visit that supports the determination of need.** EPA will review such documentation on a case-by-case basis.

Related Documents for Costs Justification: Cost of Previous Comparable Construction (05) is commonly used in conjunction with this document type.

State-Approved Municipal Wasteload Allocation Plan (27) *[17]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: <0.1*

A Municipal Wasteload Allocation Plan is a water quality analysis done to determine the level of treatment required by a specific project, which is ultimately translated into an effluent limits or BMP in the National Pollution Discharge Elimination System (NPDES) permit. This plan may be used to justify the need for a treatment plant enlargement or upgrade as long as the study identifies a specific wastewater treatment point source and appropriate design flows and treatment levels. This plan may be used to document a need and may be used to update costs if the project descriptions identify specific costs.

New Municipal, State, or Federal Regulation (28) *[35]*
Need: Yes *Costs: No* *Footnotable: No* *% 2004 needs: --*

This documentation is only for new municipal, state or federal regulations, not future or proposed regulations. New regulations can justify a need but not cost.

This documentation should include a copy of the regulation and a signed, written statement from a qualified municipal or state employee indicating which facilities are affected. States need only to reference federal regulations and do not need to submit them.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23). Note that state-generated general cost factors applied to all affected facilities are not acceptable for documenting costs.

Future or Proposed Municipal, State, or Federal Regulation (29) *[n/a]*
Need: Unofficial Only *Costs: No* *Footnotable: No* *% 2004 needs: n/a*

This documentation is for future or proposed municipal, state or federal regulations that are in the process of being enacted. This documentation should include a copy of the regulation and a signed, written statement from a qualified municipal or state employee indicating which facilities are affected.

This document type is only for Unofficial Needs.

Administrative Orders, Court Orders, or Consent Decrees (30) *[13]*
Need: Yes *Costs: No* *Footnotable: No* *% 2004 needs: <0.1*

These official documents are usually issued as the result of continued violation of an NPDES permit or other pollution control requirements. The order or decree must state a need for construction to correct the violation in order to document the need.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23).

NPDES or State Permit Requirement (with Schedule) (31) *[21]*
Need: Yes *Costs: No* *Footnotable: No* *% 2004 needs: <0.1*

The National Pollutant Discharge Elimination System (NPDES) is a permitting program implemented under authority of the Clean Water Act (CWA) that is designed to control point source discharges of pollution. All point sources discharging to waters of the United States are required to have an NPDES permit establishing effluent limitations (and other permit conditions) designed to protect the designated uses of the receiving waterbody. Municipal and industrial stormwater point sources are included in this permitting system, as well as ocean dischargers. Facilities may submit this documentation type is they (1) are not meeting effluent limitations and are on compliance schedules; or (2) are **required** to plan because they are at or near plant capacity

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23).

CSO Long-Term Control Plan (LTCP) (32) *[36]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: N/A*

EPA requires communities with combined sewer systems to comply with the Combined Sewer Overflows (CSO) Control Policy. To achieve this, most communities are required to develop and

implement a Long-Term Control Plans (LTCPs) that will ultimately provide for full compliance with the Clean Water Act, including attainment of water quality standards. These plans may be used to justify needs and costs for Category V (Combined Sewer Overflows) needs only. Documentation must be submitted to EPA.

Only LTCPs not yet approved by the state or EPA should be entered as this document type; plans approved by either EPA or the state should use Document Type 33.

Approved CSO Long-Term Control Plan (LTCP) (33) *[36]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: N/A*

EPA requires communities with combined sewer systems to comply with the Combined Sewer Overflows (CSO) Control Policy. To achieve this, most communities are required to develop and implement a Long-Term Control Plans (LTCPs) that will ultimately provide for full compliance with the Clean Water Act, including attainment of water quality standards. These plans may be used to justify needs and costs for Category V (Combined Sewer Overflows) needs only.

Only state-approved or EPA-approved LTCPs should be entered as this document type. LTCPs in Alaska, Idaho, Massachusetts, New Hampshire, New Mexico, District of Columbia, and the territories (except the Virgin Islands) must to be EPA-approved to be considered Document Type 33. Plans not yet approved by either EPA or the state should use Document Type 32.

CSO Cost Curve Needs (98) *[98]*
Need: N/A *Costs: Yes* *Footnotable: N/A* *% 2004 needs: 12.2*

States should use cost curves only when no other documents justifying needs in Category V: Combined Sewer Overflows (CSO), are available. CSO cost curves are available within the data entry system.

Though not actually a document, these cost curves are an approximation of costs to control CSOs. Because CSOs are public health threats, the needs to control them are automatically justified. EPA developed a cost-estimating methodology that approximates the CSO Control Policy presumption approach by estimating control costs for primary clarification and disinfection of 85 percent of the annual system wide runoff volume of each CSO community. The key parameters used to estimate CSO needs are combined sewer population and combined sewer area.

Documents with Emphasis on Nonpoint Source Needs

Watershed-Based Plans (40) *[n/a]*
Need: Yes *Costs: Yes* *Footnotable: No* *% 2004 needs: N/A*

Watershed-Based Plans that have not received section 319 grant funding or have not been reviewed by EPA can be used to document needs and costs if they meet the seven CWNS documentation criteria.

Section 319 Funded or EPA Reviewed Watershed-Based Plans (41) *[n/a]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: N/A*

A “319 Watershed-Based Plan” is a plan that meets all nine minimum elements prescribed in EPA’s "Supplemental Guidelines for the Award of Section 319 Nonpoint Source Grants to States and Territories in FY 2003” which is available at: http://www.epa.gov/owow/nps/Section319/319guide03.html.

Other Watershed-Based Plans not funded with 319 monies, nor reviewed by EPA are not Footnotable and should instead use Document Type 40.

Approved State Annual 319 Workplans (42) *[40]*
Approved State 319 Project Implementation Plans (43) *[41]*

42: Need: Yes	*Costs: No (With exceptions)*	*Footnotable: No*	*% 2004 needs:<0.1*
43: Need: Yes	*Costs: Yes*	*Footnotable: Yes*	*% 2004 needs:0.4*

These are Nonpoint Source Management Program Workplans and project implementation plans approved for section 319(h) funding.

State Annual 319(h) Workplans are essentially the 319(h) grant applications that states need to develop and have approved to obtain money from EPA. 319(h) Project Implementation Plans are specific plans for each NPS project on which the state has proposed to spend money.

These documents are acceptable for documenting need and cost, but only the Approved State 319 Project Implementation Plans may be footnoted. The state might have to provide any supporting documentation used to develop the costs in the documents if such detail is not available in the documents themselves. In addition to sending the Approved State Annual 319(h) Workplans or 319(h) Project Implementation Plans, the states must document the EPA region's approval of the State Annual 319(h) Workplan or each individual 319(h) Project Implementation Plan. The most recent Approved State Annual 319(h) Workplans for the state may be used as standard documentation. Earlier years' Approved State Annual 319(h) Workplans may be used only after a review of each project in the plan to determine whether the needs have been met as of January 1, 2008.

The word "approved" for each of these documents is key; this document type is only for Annual 319(h) Workplans or 319(h) Project Implementation Plans approved by the state’s EPA region.

319(h) Project Implementation Plan or State Annual 319(h) Workplan not approved by the state’s EPA region may still potentially be used as a document to justify needs and costs. There are many different reasons why a 319(h) Project Implementation Plan may not be approved by the region for eventual inclusion in the State Annual 319(h) Workplan. Lack of approval does not necessarily mean that the need or cost is not valid. "Unapproved" 319(h) Project Implementation Plans and State Annual 319(h) Workplans need to be reviewed on a case-by-case basis for inclusion in the CWNS and may not be submitted as Document Type 42 or 43.

Nonpoint Source Management Program/Assessment Report (44) *[23]*

Need: Yes	*Costs: No (With exceptions)*	*Footnotable: No*	*% 2004 needs: 0.1*

A Nonpoint Source Management Program is a 4-year plan developed by a state to address NPS pollution problems. Elements in the program include identification of the best management practices (BMPs) and measures to reduce pollutant loading, programs to achieve implementation, a schedule with annual milestones, costs and identification of specific projects, certification that the laws of the

state will provide adequate authority to implement the plan, and sources of funding and assistance. A NPS Assessment Report assesses the extent of pollution due to diffuse or NPS within a state. The report identifies navigable waters that require nonpoint source controls to achieve CWA water quality standards, sources and amounts of such pollution, and state and local control programs. It also describes the process that will be used to identify BMPs.

Related Documents for Costs Justification: Cost of Previous Comparable Construction (05) is commonly used in conjunction with this document type. States could use state-developed and EPA pre-approved methodology to justify the costs.

Nonpoint Source Management Program/Ground Water Protection Strategy Report (45) *[24]*
Need: Yes *Costs: No (With exceptions)* *Footnotable: No* *% 2004 needs: <0.1*

States can use a Comprehensive Ground Water Protection Strategy to document NPS needs if the strategy is part of a NPS Management Program. The goals of this major federal initiative addressing ground water protection are to strengthen state ground water programs; deal with significant, poorly addressed ground water problems; create a policy framework within EPA for the guidance of ground water policy; and strengthen the ground water organization within EPA. Included in such a strategy are programs established under the Safe Drinking Water Act (SDWA) such as regulation of the injection of wastes into deep wells, the Well-Head Protection Program, and the Sole Source Aquifer program. Provisions in RCRA for leaking underground storage tanks, goals in CERCLA for contaminated ground water sites, and state grant programs in the CWA for ground water protection activities are covered by this strategy.

Related Documents for Costs Justification: Cost of Previous Comparable Construction (05) is commonly used in conjunction with this document type. States could use state-developed and EPA pre-approved methodology to justify the costs.

Nonpoint Source Management Program/Wellhead Protection Program and Plan (46) *[25]*
Need: Yes *Costs: No (With exceptions)* *Footnotable: No* *% 2004 needs: --*

A Wellhead Protection Plan may be used to document NPS needs if it is part of a NPS Management Program. As part of at state's overall ground water protection strategy, each state must delineate wellhead protection areas for wells or well fields used for public water supply. Contaminant sources within the wellhead protection area must be identified and a management plan developed to protect the water supply in that area from contamination. Contingency plans for each public water supply system must be developed to ensure an appropriate response in the event that contamination occurs, and standards must be established for locating new wells so as to minimize the potential for contamination of the water supply.

Related Documents for Costs Justification: Cost of Previous Comparable Construction (05) is commonly used in conjunction with this document type. States could use state-developed and EPA pre-approved methodology to justify the costs.

Nonpoint Source Management Program/Delegated Underground Injection Control Program Plan (47) *[26]*
Need: Yes *Costs: No (With exceptions)* *Footnotable: No* *% 2004 needs: --*

A state may document needs to address NPS aspects of a Delegated Underground Injection Control Program Plan if the plan is part of the state's NPS Management Program. As part of the SDWA, EPA

and state Underground Injection Control Programs were established to protect potential underground sources of drinking water from contamination by injection wells.

Related Documents for Costs Justification: Cost of Previous Comparable Construction (05) is commonly used in conjunction with this document type. States could use state-developed and EPA pre-approved methodology to justify the costs.

Source Water Assessment/Source Water Protection Plans (48) *[n/a]*
Need: Yes *Cost: No* *Footnotable: No* *% 2004 needs: --*

Under the SDWA, states are required to develop comprehensive Source Water Assessment Programs (SWAP) that identify the areas that supply public tap water; inventory contaminants and assess water system susceptibility to contamination; and inform the public of the results. Once completed, assessments can be used to focus prevention resources on drinking water protection, and EPA has strongly encourages linking the source water assessments to implementation of source water protection programs.

Source Water Assessments identify the major potential sources of contamination to drinking water supplies. This information is used to determine how susceptible the water system is to contamination, and could be helpful in justifying CWNS needs. States must use the system or town specific assessment to justify the needs, not the statewide summary.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), eFOTOGs (50), State/Federal Agricultural Cost-Share Program Cost Tables (51), or other NPS documents that has cost information to develop innovative methodologies to justify NPS needs. These innovative methodologies should be pre-approved by EPA before entering the costs in the system. In cases where the purchase of land or development rights is justified, professional appraisals (52) could be used to justify costs.

NRCS Conservation Plans and Farm Plans (49) *[n/a]*
Need: Yes *Cost: No (with exceptions)* *Footnotable: No* *% 2004 needs: --*

Natural Resource Conservation Service (NRCS) Farm Plans and Conservation Plans are documents developed by NRCS (or Conservation Districts) and farmers or landowner. They are a series of actions developed to meet a farmer's goals while protecting water quality and the natural resources. Some of the things considered in a plan are farm size, soils type, slope of the land, proximity to streams or water bodies, type of livestock or crops, the farmer's goals, resources such as machinery or buildings and finances available. Farm Plans and Conservation Plans recommend practices to improve farm productivity, reduce the impact on the natural resources, and address potential water quality concerns.

Only those practices recommended to address potential water quality problems should be included in the CWNS. Some plans might include cost information. When using Conservation Plans or Farm Plans, states must be aware that some of the estimates of areas needing treatment and conservation practices are to protect the agricultural capability of the soil, not water quality. Therefore, they should not be included in the CWNS.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), eFOTOGs (50), State/Federal Agricultural Cost-Share Program Cost Tables (51), or other NPS documents that has cost information

to develop innovative methodologies to justify NPS needs. These innovative methodologies should be pre-approved by EPA before entering the costs in the system.

Electronic Field Office Technical Guide (eFOTOG) (50) *[n/a]*
Need: No (with exceptions) *Cost: Yes* *Footnotable: No* *% 2004 needs: --*

eFOTOG are the primary scientific references for NRCS. They contain technical information about the conservation of soil, water, air, and related plant and animal resources. eFOTOG used in each field office are localized so that they apply specifically to the geographic area for which they are prepared. Section I of the eFOTOGs contains conservation practice costs, which might include the unit cost of some agricultural BMPs. See http://www.nrcs.usda.gov/technical/efotg/.

In general, eFOTOG do not provide acceptable needs information. However, EPA will accept this document as a justification for a need in a case by case basis. When using eFOTOG information, states must be aware that most of the estimates of areas needing treatment and conservation practices are to protect the agricultural capability of the soil, not water quality related. Therefore, they should not be included in the CWNS.

Related Documents for Needs Justification: Documents commonly used in conjunction with NRCS Conservation Plans and Farm Plans (49) or other NPS documents to develop innovative methodologies to justify NPS needs. These innovative methodologies should be pre-approved by EPA before entering the costs in the system.

State/Federal Agricultural Cost-Share Program Cost Tables (51) *[n/a]*
Need: No *Cost: Yes* *Footnotable: No* *% 2004 needs: --*

Some state and federal programs address agriculture's contribution to the NPS water pollution problem by providing financial incentives to farmers to install BMPs on their property.

The Agriculture Cost Share Program is one of the most common financial incentives used. Participating farmers receive a percentage of predetermined average costs of installed best management practices (BMPs) with the remaining fraction paid by farmers directly or through in-kind contributions. Each program has cost tables of the predetermined average costs for BMPs and/or summaries of projects implemented by county. These unit costs can be used to estimate the total cost of a project

Related Documents for Needs Justification: Documents commonly used in conjunction with NRCS Conservation Plans and Farm Plans (49) or other NPS documents to develop innovative methodologies to justify NPS needs. These innovative methodologies should be pre-approved by EPA before entering the costs in the system.

Professional Appraisals (52) *[n/a]*
Need: No *Cost: Yes* *Footnotable: No* *% 2004 needs: --*

The purchase of land or easements—usage rights—are increasingly being used to protect water quality or human health by preserving a determined level of ecosystem functions. Appraisals of the land or easements to be purchased can be used to justify costs, provided that the need is justified by another document(s).

State coordinators should be aware that these costs will be accepted only in those situations where the easement or land purchase is done with the primary purpose to solve a water quality of human health

problem; situations where water quality or human health benefits are just one of a set of benefits are not eligible.

Related Documents for Needs Justification: Documents commonly used in conjunction with NRCS Conservation Plans and Farm Plans (49), Source Water Assessment/Source Water Protection Plans (48), or other NPS documents to develop innovative methodologies to justify NPS needs. These innovative methodologies should be pre-approved by EPA before entering the costs in the system.

Documents with Emphasis on Stormwater Needs

Municipal Stormwater Management Plan (60) *[22]*
Need: Yes *Costs: No (With exceptions)* *Footnotable: No* *% 2004 needs: 0.41*

A Municipal Storm Water Management Plan is a plan submitted as part of a municipality's NPDES stormwater permit application. It includes a description of the structural and source control measures to be implemented to (1) reduce pollutants in runoff from commercial and residential areas that are discharged from the storm sewer, (2) detect and remove illicit discharges and improper disposal into storm sewers, (3) monitor pollutants in runoff from industrial facilities that discharge to municipal separate storm sewers, (4) reduce pollutants in construction site runoff that is discharged to municipal separate storm sewers, and (5) enhance municipal maintenance, public education, and public involvement.

Related Documents for Costs Justification: Documents commonly used in conjunction with this document type include Cost of Previous Comparable Construction (05), CIPs (20), or engineer's estimates (22 and 23).

Need for Small Communities (fewer than 10,000 persons)

Documentation Types 71–72: The following paragraphs describe alternative documentation types for small communities. **Note: These documentation types are applicable only to communities with populations of fewer than 10,000 persons and may be used *only* if other acceptable documentation types are not available**. This population is the sum of the present resident population receiving treatment, present resident population serviced by individual sewage disposal systems, and the present resident population not receiving collection. (The present resident population receiving treatment is equal to the present resident population receiving collection plus any upstream population serviced by other facilities in the sewershed.)

Small Community Needs Form (71) *[30]*
Need: Yes *Costs: Yes* *Footnotable: Yes* *% 2004 needs: 0.2*

For communities with populations of fewer than 10,000 persons, use of a standard survey form developed by EPA is acceptable for documenting need (and cost) as long as signatures are included. If costs are not included, cost curves can be used.

For specific communities with populations of 3,500 or less and under extraordinary circumstances, states may apply to EPA headquarters for pre-approval on ability for a state registered engineer (PE) or circuit rider to sign the cost or need justification for document type 71. States should send written statements to EPA headquarters with the community's details and why local signatures are not

available. Requests to EPA headquarters should be done individually for each community. States should wait until EPA headquarters approves the request before entering needs or cost information into the database.

Information from an Assistance Provider (72) *[31]*
Need: Yes *Costs: No* *Footnotable: No* *% 2004 needs: <0.1*

For communities with populations of fewer than 10,000 persons, a statement of need from a technical assistance provider (e.g., state training center, health department, circuit rider), along with a soils/geologic report and health department report, may document need. Local official and service provider signatures must be included. Cost curves can be used to document costs.