

Appendix H

List of Acceptable Documentation Types

Table H-1 lists the document types that were acceptable for justifying needs or costs for the CWNS 2000, as well as the percent of total needs that were documented with each document type.

Table H-1. CWNS 2000 List of Acceptable Documentation Types

Documentation Type	Allowable for Justification of		Percent of Total Documented Needs in Table A-1
	Need	Cost	
<p>1. Capital Improvement Plan</p> <p>A capital improvement plan is a fiscal planning document used by cities that usually spans 1 to 20 years. It contains project- and cost-specific information and is sometimes referred to as a Master Plan. The capital improvement plan must adequately address why the project is needed and provide costs that are project-specific.</p>	Yes	Yes ^a	41.0
<p>2. Infiltration/Inflow (I/I) Analysis</p> <p>An I/I analysis is a document that identifies excessive flow problems due to infiltration or inflow into the sewage conveyance system. The I/I analysis itself may be contained in a facility plan, a sewer system evaluation survey, or a CSO report.</p>	Yes	Yes	0.1
<p>3. Sewer System Evaluation Survey (SSES)</p> <p>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. In many cases a CSO study is placed in this category.</p>	Yes	Yes	1.0
<p>4. Final Engineer's Estimate</p> <p>The final engineer's report is typically submitted as a result of a detailed facility design. It contains a specific description of the project scope and a list of work to be done with detailed itemized costs.</p>	Yes	Yes	5.4
<p>5. Cost of Previous Comparable Construction</p> <p>This estimate of cost must be based on the cost of a recently completed project that is similar in size, scope, and location and for which detailed construction cost data are available. This document may be used to justify costs if stringent guidelines are followed and the costs are project-specific.</p>	No	Yes ^a	1.7
<p>6. Facility Plan</p> <p>Excerpts from a facility plan are acceptable forms of documentation to justify a need and to update cost estimates. The facility plan contains project-specific information, and 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.</p>	Yes	Yes	14.3
<p>7. Plan of Study</p> <p>This documentation type must be an official project description. Any type of preliminary engineering study done before more detailed planning to assess the scope and feasibility of the project is categorized as a Plan of Study. It may be used only to document the need. EPA cost curves will be used to estimate the costs based on the project description.</p>	Yes	No	0.1
<p>8. State Priority List/Intended Use Plan</p> <p>The 1-year fundable plus 4-year planning portion of the FY2000 or FY2001 list may be used to document need as long as it was accepted by the Region. The cost estimate report on the priority list may be used to document a cost estimate for the facility if the project is in the fundable portion of the priority list. Projects on the fundable portion of the current intended use plan may also be used for cost estimates.</p>	Yes	Yes ^b	7.5
<p>9. State-Approved Area-wide or Regional Basin Plan</p> <p>The Clean Water Act's section 208 and 303 Regional Basin Plans are broad-based water quality management plans written to identify future planning for areas in a State. Only section 208 and 303 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.</p>	Yes	Yes ^a	2.3

continued

Table H-1. (continued)

Documentation Type	Allowable for Justification of		Percent of Total Documented Needs in Table A-1
	Need	Cost	
<p>10. Federal or State Grant Application Form or State Revolving Fund Loan Application</p> <p>Federal or equivalent State grant applications or State Revolving Fund applications may be used to document needs and to update costs for the categories in which the grant money is requested. Applications should contain sufficient clearly written narrative that defines the specific project and the water quality and/or public health problem. If an equivalent State grant program application is used as documentation, <i>the form must be submitted.</i></p>	Yes	Yes	2.7
<p>11. Municipal Compliance Plan (MCP)</p> <p>An MCP is developed when a municipality needs to construct a wastewater treatment facility to achieve compliance. The MCP should describe the necessary treatment technology and estimated cost, outline the proposed sources and methods of financing the proposed facility (both construction and operation and maintenance), and provide a schedule for achieving compliance as soon as possible.</p>	Yes	Yes	0.5
<p>12. Diagnostic Evaluation Results of Municipal Wastewater Treatment Plants Demonstrating Need for Construction</p> <p>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.</p>	Yes	No	<0.1
<p>13. Administration Order/Court Order/Consent Decree Demonstrating Need to Construct</p> <p>These official documents are usually issued as the result of continued violation of a 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. Cost curves may be used to calculate associated costs.</p>	Yes	No	<0.1
<p>14. Sanitary Survey or Certification from a Health Official</p> <p>A Sanitary Survey is a logical, investigative approach to gather information to evaluate the condition of existing on-site wastewater systems. The sanitary survey must document high area-wide failure rates that are considered serious enough to be a health hazard (such as ground water contamination caused by malfunctioning septic tanks) to document a need. The documentation must clearly state that on-site failures are contributing to a water pollution or health-related problem. EPA reviews this documentation on a case-by-case basis.</p>	Yes	No	0.1
<p>15. State-Approved Local/County Comprehensive Water and Sewer Plans</p> <p>These plans are similar to State-Approved Area-Wide Basin Plans. These local plans also cover fairly large areas and might not contain project-specific information. These local plans must clearly identify a water quality or health-related problem and must be project-specific to be acceptable as documentation.</p>	Yes	Yes ^a	2.0
<p>16. State Certification of Excessive Flow</p> <p>This document may be used to demonstrate that a need exists for infiltration/inflow correction.</p>	Yes	No	NU
<p>17. State Approved Municipal Wasteload Allocation Plan</p> <p>A Municipal Wasteload Allocation Plan is a water quality analysis used to determine the level of treatment required by a specific project, which is ultimately translated into an effluent limitation for the NPDES permit. These plans may be used to justify the need for a treatment plant enlargement or upgrade as long as the study identifies a specific sewage 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.</p>	Yes	Yes ^a	0.1
<p>18. For EPA Use Only</p> <p>States should not use this documentation code.</p>	NA	NA	NU

continued

Table H-1. (continued)

Documentation Type	Allowable for Justification of		Percent of Total Documented Needs in Table A-1
	Need	Cost	
<p>21. National Pollutant Discharge Elimination System (NPDES) or State Permit Requirements (with Schedule)</p> <p>NPDES is a permitting program implemented under authority of the Clean Water Act and designed to control point source discharges of pollution. Facilities not meeting effluent limitations and compliance schedules or facilities required to plan because they are at or near plant capacity may submit documentation under documentation type 21.</p>	Yes	No	0.2
<p>22. Municipal Storm Water Management Plan</p> <p>A Municipal Storm Water Management Plan is a plan that describes a proposed municipal storm water management program as part of a municipality's NPDES storm water permit application. It includes a description of structural and source control measures that are 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, and (4) reduce pollutants in construction site runoff that is discharged to municipal separate storm sewers.</p>	Yes	Yes	0.5
<p>23. Nonpoint Source Management Plan/Assessment Report</p> <p>A Nonpoint Source Management Plan is a 4-year plan developed by a State to address NPS pollution problems. Elements of the plan include identification of the 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 Nonpoint Source Assessment Report assesses the extent of pollution due to diffuse or nonpoint sources within a State. The report identifies navigable waters that require NPS controls to achieve Clean Water Act 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. EPA will consider other documentation, such as NPS grant applications and States' surveys, on a case-by-case basis.</p>	Yes	No ^c	1.0
<p>24. Nonpoint Source Management Plan/Ground Water Protection Strategy</p> <p>States may use a Comprehensive Ground Water Protection Strategy to document NPS needs if the strategy is part of a Nonpoint Source 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, such as regulation of the injection of wastes into deep wells, the Wellhead Protection Program, and the Sole Source Aquifer Program. Provisions in the Resource Conservation and Recovery Act for leaking underground storage tanks, goals in the Comprehensive Environmental Response, Compensation, and Liability Act for contaminated ground water sites, and State grant programs in the Clean Water Act for ground water protection activities are covered by this strategy.</p>	Yes	No ^c	<0.1
<p>25. Nonpoint Source Management Plan/Wellhead Protection Program and Plan</p> <p>A Wellhead Protection Plan may be used to document NPS needs if it is part of a Nonpoint Source Management Program. As part of its 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.</p>	Yes	No ^c	NU

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Table H-1. (continued)

Documentation Type	Allowable for Justification of		Percent of Total Documented Needs in Table A-1
	Need	Cost	
<p>26. Nonpoint Source Management Plan/Delegated Underground Injection Control Program Plan</p> <p>A State may document needs to address NPS aspects of a Delegated Underground Injection Control Program Plan if it is part of the State's Nonpoint Source Management Program. As part of the Safe Drinking Water Act, EPA and State Underground Injection Control Programs were established to protect potential underground sources of drinking water from contamination by injection wells.</p>	Yes	No ^c	NU
<p>27. Estuary Comprehensive Conservation and Management Plan</p> <p>A CCMP is a management plan developed for an estuary that has been nominated for the Clean Water Act section 320 National Estuary Program. The CCMP summarizes findings, identifies and establishes a priority for addressing problems, determines environmental quality goals and objectives, identifies action plans and compliance schedules for pollution control and resource management, and ensures that designated uses of the estuary are protected.</p>	Yes	No ^c	<0.1
<p>28. Funding Applications (<i>applicable only for communities with populations of less than 3,500</i>)</p> <p>All applications for funding (with signed agency review sheets, e.g., Rural Economic and Community Development—formerly Farmers Home Administration, Community Development Block Grant—Housing and Urban Development) other than State Revolving Funds are acceptable for need. The application is acceptable for cost if an engineering report is reviewed by qualified State project staff. (See documentation type 10 for State Revolving Fund loan applications.)</p>	Yes	Yes	<0.1
<p>29. State Needs Surveys (<i>applicable only for communities with populations of less than 3,500</i>)</p> <p>All State Needs Surveys are acceptable for documenting <i>need</i> if</p> <ul style="list-style-type: none"> • A local government official's signature is included ("local" means city, community, town, borough, village, or county). • Information describing the problem is attached. • Information describing prior or ongoing planning efforts and descriptions of the cost-effective control option are offered. <p>State Needs Surveys are acceptable for documenting <i>cost</i> 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. Qualified State project staff must also sign a Statement of Cost Reasonableness after reviewing the estimate.</p>	Yes	Yes	0.4
<p>30. Model Survey (<i>applicable only for communities with populations of less than 3,500</i>)</p> <p>Use of a standard or "model" survey form (only for populations of fewer than 3,500) is acceptable for documenting need (and cost) as long as appropriate signatures are included. If costs are not included, cost curves may be used.</p>	Yes	Yes	0.4
<p>31. Information from an Assistance Provider (<i>applicable only for communities with populations of fewer than 3,500</i>)</p> <p>A Statement of Need from a technical assistance provider (e.g., State training center, health department, circuit rider), along with a soils/geologic report, would document need for communities. Local official and provider signatures must be included. Cost curves may be used to document costs.</p>	Yes	No	<0.1
<p>36. Combined Sewer Overflow Long-Term Control Plan (LTCP)</p> <p>A plan, comparable to a facility plan, which describes long-term control measures for CSO. Quality may vary across States. Documentation must be submitted.</p>	Yes	Yes	2.2
<p>40. Approved State Annual 319 Workplans</p> <p>These are Nonpoint Source Management Program workplans approved for section 319(h) funding.</p>	Yes	Yes	<0.1

continued

Table H-1. (continued)

Documentation Type	Allowable for Justification of		Percent of Total Documented Needs in Table A-1
	Need	Cost	
41. Approved State 319 Project Implementation Plans These are Nonpoint Source Management Program project implementation plans approved for section 319(h) funding.	Yes	Yes	0.1
98. Combined Sewer Overflow Cost Curves 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.	Yes	Yes	16.3
99. EPA-HQ Approved These are documents preapproved by EPA headquarters.	Yes	Yes	0.3
S1. Regulation Changes This is an SSE document type for needs related to regulatory changes. Because this is a document type for SSEs, the need it supports is not eligible for State Revolving Fund assistance and the document does not undergo review.	NA	NA	NA
S2. State Survey Forms This is an SSE document type for survey forms specific to a particular State. Because this is a document type for SSEs, the need it supports is not eligible for State Revolving Fund assistance and the document does not undergo review.	NA	NA	NA
S3. Extended Priority List This is an SSE document type for a document that is on a State extended priority list. Because this is a document type for SSEs, the need it supports is not eligible for State Revolving Fund assistance and the document does not undergo review.	NA	NA	NA

Notes: NA = not applicable.
NU = not used.

^a Documentation will be reviewed by EPA to make sure that costs are within acceptance ranges.

^b Only the 1-year fundable portion may be used to justify cost.

^c Documentation might have information that may be used to justify cost. Cost justification for Categories I through VII must be project-specific and distributable among Categories I through VII.