

**Information Collection Request for the
National Wastewater Operator Training and
Technical Assistance Program
Section 104(g)(1) of the Clean Water Act**

**EPA ICR No. 1977.03
OMB Control No. 2040-0238**

May 2, 2008

**U.S. Environmental Protection Agency
Office of Wastewater Management
Municipal Assistance Branch
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1.0 IDENTIFICATION OF THE INFORMATION COLLECTION

1.a Title of the Information Collection

National Wastewater Operator Training and Technical Assistance Program Section 104(g)(1) of the Clean Water Act (Renewal).

EPA ICR No.: 1977.03

OMB Control No.: 2040-0238

1.b Short Characterization/Abstract

In 1982 Congress recognized the need for wastewater operator training. Sections 104(g)(1) and 308 of the Clean Water Act (CWA) authorize this Information Collection Request (ICR) regarding the Wastewater Operator Training and Technical Assistance Program, otherwise known as the 104(g) Program. The purpose of the 104(g) Program is to provide an adequate supply of trained personnel to operate and maintain existing and future treatment works and related activities, and to enhance substantially the proficiency of those engaged in such activities. The statute calls upon U.S. EPA, in cooperation with state and interstate agencies, municipalities, educational institutes, and other organizations, to develop training and retrain people in the field of, or who are entering into the field of, operations and maintenance of treatment works and related activities.

2.0 NEED FOR AND USE OF THE COLLECTION

2.a Need and Authority for the Collection

Sections 104(g)(1) and 308 of the Clean Water Act provide the authority for the Wastewater Operator Training Program. The U.S. EPA has made the decision to collect information to track data pertaining to the 104(g) Program. The goal of this collection is to evaluate the outcomes and environmental benefits of the 104(g) Program's assistance activities. This information will also help assistance providers to improve the outreach activities that are provided through the 104(g) Program.

2.b Practical Utility of the Data and Users of the Data

U.S. EPA uses the information collected to update its 104(g) Program database that contains information on the wastewater treatment plants assisted by the 104(g)

Program. The database is used as a source of information to monitor the pollutant reduction progress, compliance status, and other environmental outcomes and benefits to the wastewater treatment plants assisted through the 104(g) Program.

3.0 NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3.a Non-duplication

U.S. EPA has researched and discussed the data collection responsibilities with the Wastewater Operator Training and Technical Assistance Program's training centers. There are no other reporting requirements of this nature being conducted by these centers. Our research revealed no duplicative reporting requirements.

3.b Public Notice Required Prior to ICR Submission to OMB

In compliance with the 1995 Paperwork Reduction Act, any agency developing a non-rule related ICR must solicit public comments for a 60-day period prior to submitting the ICR to Office of Management and Budget (OMB). The comments, which are used partly to determine realistic burden estimates for respondents, must be considered when completing the Supporting Statement that is submitted to OMB. EPA published the Federal Register notice for this draft ICR renewal on January 23, 2008, (Federal Register Vol. 73, No. 15, pages 3956-3958) to seek public comments. No comments were received during the comment period.

3.c Consultations

Participant trainers of the National Operator Training Program were consulted for comments on this information collection request. The following people were contacted by email:

Phillip Preston, Indiana Department of Environmental Management, Ph: 317-232-8728

Richard Weigand, West Virginia Environmental Training Center, Ph: 304-372-7878

Bill Patenaude, Rhode Island Department of Environmental Management,
Ph: (401) 222-4700

Brett Ward, University of Tennessee Municipal Technologies Advisory Services,
Ph: 865-974-0411

Steve Duerre, Minnesota Pollution Control Agency, Ph: 651-296-9264

Bill Engel, Director University of Florida TREEO Center, Ph: 352-392-9570

Robert Gott, Program Coordinator, New Mexico, Ph: 352-392-9570

Doug Hill, Michigan Department of Environmental Quality, Ph: 517- 373-4754

Larry Murphree, Environmental Trainer, Mississippi, Ph: 662-234-3733

Six of the above trainers responded. Two respondents from Mississippi consider the actual burden to be more than in the ICR because of difficulties in gathering the information from their main offices, where all the records are kept. One respondent indicates that the reporting requirements are appropriate for the 104(g) Program because the pollutant reduction data is necessary to demonstrate the effectiveness of the program. The last three respondents feel that the required reporting burden is either less than or is same as the one reported in the ICR, and stated that we should collect additional information about biosolids, total phosphorus violations, and staffing problems.

3.d Effects of Less Frequent Data Collection

The EPA collects the information three times a year for the Wastewater Operator Training and Technical Assistance Program ICR. The EPA Office of Wastewater Management collects annual pollutant load reduction information. The EPA Regions, under grant conditions, require semi-annual, mid-fiscal year (May) and the end of the fiscal year (November), reporting on the status of any given year's assistance projects. The pollution reduction information is essential to illustrate the environmental benefits of the 104(g) Program. The EPA collects this information to track the number of facilities assisted and the status of the projects. Thus, EPA ensures that the training center grantees' commitments to the EPA Regions are met. If EPA collects data less frequently, it would impair EPA's ability to monitor the grantee's progress per the grant conditions and may be detrimental to the 104(g) Program.

3.e General Guidelines

This ICR is consistent with 5CFR 1320.5(D)(2), and adheres to all guidelines for information collection requests.

3.f Confidentiality

Where information submitted in conjunction with this ICR contains trade secrets or similar confidential business information, the respondent has the authority to request that this information be treated as confidential business information. All data so designated will be handled pursuant to 40 CFR Part 2. This information will be maintained according to procedures outlined in EPA's Security Manual Part III, Chapter 9, dated August 9, 1976. Pursuant to Section 308(b) of the CWA, effluent data may not be treated as confidential.

3.g Sensitive Questions

The reporting requirements addressed in this ICR do not include sensitive

questions.

4.0 THE RESPONDENTS AND THE INFORMATION REQUESTED

4.a Respondents and NAICS Codes

The following is a list of North American Industry Classification System (NAICS) codes associated with the Wastewater Operator Training Program:

924110 - Environmental Protection Program Administration
611310 - Colleges
611210 - Junior Colleges

4.b Information Requested

4.b(i) Data Items, including Record-keeping Requirements

Reporting:

- 1) Spreadsheet reporting categories:
 - A.) Number of Facilities that have Completed Assistance: achieved compliance, maintained compliance, improved performance, and no improvement; and
 - B.) Number of Facilities that are Continuing Assistance: achieved compliance, maintained compliance, improved performance, and no improvement.
- (See Attachment 1 for spreadsheet and guidance.)
- 2) Database reporting categories for each facility assisted:
EPA Region, Facility Name, Facility Street Address, City/Town, State, Zip Code, Start Assistance Date, Compliance Status at the Start, Compliance Achieved Date, Conclusion Assistance Date, Type of Facility, Top Five Performance Limiting Factors, Repeat Assistance Facility, If Repeat - Date of Last Assistance, Tribal Assistance, Design Size of the Plant, Comments, Other Benefits, Permit Number, Biological Oxygen Demand Average Start, Total Suspended Solids Average Start, Nitrogen Average Start, Biological Oxygen Demand Average End, Total Suspended Solids Average End, Nitrogen Average End, Longitude, Latitude, and Annual Average Flow.

(See Attachment 2 for database and guidance.)

U.S. EPA requires that the Wastewater Operator Training and Technical Assistance Program training center grantees report this information. It will be to the training center grantee's benefit to keep the requested information on hand after reporting, but it will not be required by the U.S. EPA. The 104(g) Program's trainers will use the reporting requirements covered by this ICR to measure an assisted facility's improvement and the subsequent environmental benefits of the assistance efforts.

4.b(ii) *Respondent Activities*

Under the grant compliance requirements, the EPA Regions require the respondents to submit status data semi-annually on a spreadsheet created by EPA. The training center grantee will submit the information electronically to the corresponding U.S. EPA Regional Office, with a copy to U.S. EPA Headquarters. The information collected is based on the trainer's activity at the assisted site. The trainer knows the status of the facility being assisted, and hence, no extraneous paper work will be required.

The respondents, under the grant conditions, will be required to submit the pollutant data information on an annual basis in the format established by U.S. EPA. This information will be submitted electronically from the training center grantee to the corresponding U.S. EPA Regional Office, with a copy to U.S. EPA Headquarters. The majority of the information collected will be obtained while the trainer is at the facility being assisted. The pollution reduction information will be obtained via either an on-site visit or the telephone.

5.0 THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5.a *Agency Activities*

In collecting and analyzing the information associated with Wastewater Operator Training Program ICR, the U.S. EPA will compile and maintain up to five years of data. The spreadsheet forms and 104(g) Program database format will be created by U.S. EPA and sent to the 104(g) Program's training center grantees. The U.S. EPA will review the provided information, and create an annual accomplishment report that will be placed on the EPA's website.

5.b *Collection Methodology and Management*

The data will be entered into the spreadsheet form and the database form by the 104(g) Program training centers, the information will be submitted electronically to the appropriate U.S. EPA Regional Office, with a copy to U.S. EPA Headquarters. The U.S.

EPA will ensure the accuracy and completeness of information collected by reviewing each submittal upon receipt. The data will be stored at U.S. EPA Headquarters' Wastewater Operator Training Program coordinator's desk top computer. The public may access the data upon request to the U.S. EPA.

5.c *Small Entity Flexibility*

The Wastewater Operator Training Program ICR does not have a significant economic impact on a substantial number of small entities. Therefore, this section does not apply to this ICR.

5.d *Collection Schedule*

Information will be collected three times a year for the Wastewater Operator Training Program ICR. Annual reporting for the database information is required in November of each year. Semi-annual reporting for the status of any given year's assistance projects in spreadsheet format is required mid-fiscal year (May) and the end of the fiscal year (November).

6.0 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

The total number of respondents is estimated to be the forty-six 104(g) Program training center grantees. The responses are collected three times per year. The projected combined annual cost of this ICR to all forty-six 104(g) training center grantee respondents and the federal government will be approximately \$24,600. The average annual cost to each 104(g)(1) training center will be \$312.20, for a total cost of \$14,361.20 per year. The average annual cost to EPA's Regional Offices and Headquarters will be \$930.88, for a total cost of \$10,239.68 per year. The projected combined annual burden hours of this ICR will be 498 hours. The average annual burden hours to each State or training center grantee will be 7 hours, for a total of 322 hours per year for all 46 public respondents. The average annual burden hours to each EPA Regional Office and Headquarters will be 16 hours, for a total of 176 burden hours.

Data will be collected on an annual basis, in November of each year, for the database collection, and data for the spreadsheet information will be collected on a semi-annual basis, in May and November of each year. This information collection is required under the grant requirements; EPA expects that 100% of the 104(g) training centers will respond to this collection request. All forty-six (46) training centers grantees and U.S. EPA have the necessary equipment, desk-top computers with appropriate software to collect and manage this information. There will be no additional start-up or maintenance costs associated with this project to perform this information collection request. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This

includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information; and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

Salaries for the 104(g) Program training center grantee staff are based on the Bureau of Labor statistics weekly earnings as of October, 2007. The U.S. EPA salaries are based on the 2007 federal salary, GS-level 13 step 5. A loaded wage estimate was calculated by multiplying the federal wage by 1.6.

The cost imposed on the training center grantees to the requirements discussed in this ICR is a function of the burden placed on them for record keeping and reporting the information described above and the wages of a typical worker performing these activities.

Estimates of civilian salaries associated with this information collection have been prepared using the Bureau of Labor's statistics for October, 2007. This information is on the Bureau of Labor's web-page at the following Internet address:

<http://www.bls.gov/news.release/ecec.t02.htm>

- \$ This ICR estimates the average loaded annual salary for a civilian professional employee is \$89,200 per year, at the hourly rate of \$44.60; and
- \$ U.S. EPA estimates that the total annual civilian employee response cost is \$14,361.20 for record keeping and reporting.

Estimates of the federal government respondent costs associated with this information collection have been prepared using the Federal Salary Table 2007. This information is on the Office of Personnel Management's web-page at the following Internet address: http://opm.gov/oca/07tables/html/gs_h.asp

- \$ The average annual salary for a federal employee working on data collection and submission for this ICR is estimated to be equivalent to a GS-13, Step 5, and a loaded salary of \$116,360 per year, at the hourly rate of \$58.18; and
- \$ EPA estimates that the total annual federal employee response cost is \$10,239.68 for record keeping and reporting.

6.a Estimating Respondent Burden

Activity: Spreadsheet	No. of Respondents	No. of Hours/ Respondent	Total Annual Hours
Training center grantees, civilian professional specialty and technical staff; record keeping and reporting for the spreadsheet (semi-annual).	46	2	92
Activity: Database	No. of Respondents	No. of Hours/ Respondent	Total Annual Hours
Training center grantees, civilian professional specialty and technical staff; record keeping and reporting for the database (annual).	46	5	230

6.b Estimating Respondent Burden and Cost

Activity: Spreadsheet	Response Hours	Cost Per Hour	Total Annual Labor Cost
Training center grantees, civilian professional specialty and technical staff; record keeping and reporting for the spreadsheet (semi-annual).	92	\$44.60	\$4,103.20
Activity: Database		Cost Per Hour	Total Annual Labor Cost
Training center grantees, civilian professional specialty and technical staff; record keeping and reporting for the database (annual).	230	\$44.60	\$10,258.00
Total	322		\$14,361.20

6.c Estimating Agency Burden and Cost

Activity: Spreadsheet	No. of Respondents	No. of Person Hours Per Respondent	Cost Per Hour	Total Annual Hours	Total Annual Labor Cost
U.S. EPA staff; record keeping and reporting for the spreadsheet (semi-annual).	11	8	\$58.18	88	\$5,119.84
Activity: Database	No. of Respondents	No. of Hours per Respondent	Cost Per Hour	Total Annual Hours	Total Annual Cost
U.S. EPA staff; record keeping and reporting for the database (annual).	11	8	\$58.18	88	\$5,119.84
Total			\$58.18	176	\$10,239.68

\$ Total annual hours per each EPA respondent is 16 hours.

6.d Estimating Respondent Universe and Total Burden Hours and Costs

Activity: Spreadsheet	No. of Respondents	No. of Person Hours	Cost Per Hour	Total Annual Hours	Total Annual Labor Cost
Training center grantees, civilian professional specialty and technical staff; record keeping and reporting for the spreadsheet (semi-annual).	46	2	\$44.60	92	\$4,103.20
U.S. EPA staff; record keeping and reporting for the spreadsheet (semi-annual).	11	8	\$58.18	88	\$5,119.84
SUB-TOTALS				180	\$9,223.04

Activity: Database	No. of Respondents	No. of Person Hours	Cost Per Hour	Total Annual Hours	Total Annual Labor Cost
Training center grantees, civilian professional specialty and technical staff; record keeping and reporting for the database (annual).	46	5	\$44.60	230	\$10,258.00
U.S. EPA staff; record keeping and reporting for the database (annual).	11	8	\$58.18	88	\$5,119.84
SUB-TOTALS				318	\$15,377.84

6.e Bottom Line Burden Hours and Cost Tables

	No. of respondents includes the 46 grantees and the 10 EPA Regional Offices and EPA Headquarters	Total Annual Hours	Total Annual Labor Cost
State Respondents	46	322	\$14,361.20
EPA Burden for 10 Regions + HQ	11	176	\$10,239.68
TOTALS:	57	498	\$24,600.88

6.f Reasons for Change in Burden

There is no change in the burden hours from the previous ICR approved by the OMB as the 104(g) Program and the number of reporting States or training centers remains the same. Increase in the cost is due to the increase in the wages of the professional staff.

6.g Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to be seven hours per respondent for 46 respondents with a total burden of 322 hours. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2003-0078, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Water Docket is (202) 566-2426. An electronic version of the public docket is available through <http://www.regulations.gov>. Use <http://www.regulations.gov> to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OW-2003-0078 and OMB control number 2040-0238 in any correspondence.

Attachment 1

National Wastewater Operator Training and Technical Assistance Program Excel Reporting Spreadsheet

Region
State
Grant amount

Training Completed

Achieved Compliance
Maintained Compliance
Improved Performance
No Improvement

Training Ongoing

Achieved Compliance
Maintained Compliance
Improved Performance
No Improvement

Total

Carry-overs from previous year

Number new projects

Diagnostic Evaluations

New Initiatives (BNR)
Continuing Work (BNR)

Attachment 1 continued

Wastewater Operator Training Program / 104(g) Excel Spreadsheet Reporting

Definitions of Categories / Reporting Fields for Training Completed Facilities:

Achieved Compliance: Starts with the facility out of compliance with its NPDES permit at the beginning of the compliance assistance. After the facility has completed its assistance, the facility was in compliance with its NPDES permit. In order to be rated as achieved compliance at the end of assistance, the facility needs to be in compliance with all elements of its NPDES permit for three consecutive months.

Maintained Compliance: Starts with the facility in compliance with its NPDES permit at the beginning of the compliance assistance. However, the facility is demonstrating performance problems which could lead to non-compliance with its NPDES permit. After the facility completed its assistance, the facility has halted any further deterioration in performance, improved its performance, and continued to stay in compliance with its NPDES permit. The underlying theme with compliance maintenance facilities is that there is “something wrong” with performance but it is not “wrong” enough to exceed NPDES permit levels.

Improved Performance: Starts with the facility out of compliance with its NPDES permit at the beginning of the compliance assistance. However, compliance assistance is leading the facility to better operation and maintenance. After the assistance has been completed at the facility, “total” compliance may have not been achieved on a consistent basis, but the facility is definitely operating better. The facility has reduced periods of non-compliance, reduced levels of pollutants discharged, or has had significant increases in efficiencies such as: lower energy usage, better (and often lower) chemical usage for proper operation, and adequate financial support enabling operators to better address problems in a more timely fashion. The facility may not be in “total” compliance with its NPDES permit, but it has “significantly” increased its performance. The facility has completed its compliance assistance training with the Program and may still be out of compliance, this is due to circumstances beyond the Program’s control such as, the need for an upgrade to the treatment facility.

No Improvement: Starts with the facility out of compliance with its NPDES permit at the beginning of the compliance assistance training, and continues to be out of compliance with little or no improvement. The facility has opted to discontinue its participation in the Program.

Definitions of Categories / Reporting Fields for Training Continuing Facilities:

Achieved Compliance: Starts with the facility out of compliance with its NPDES permit at the beginning of the compliance assistance. Even though the facility has achieved compliance, it is continuing its assistance to ensure a permanent compliance status.

Maintained Compliance: Starts with the facility in compliance with its NPDES permit at the beginning of the compliance assistance. However, the facility is demonstrating performance problems, which could lead to non-compliance with its NPDES permit. After the facility has completed its assistance, the facility has halted any further deterioration in performance, improved its performance, and has continued to stay in compliance with its NPDES permit.

Improved Performance: Starts with the facility out of compliance with its NPDES permit at the beginning of the compliance assistance. However, the assistance is leading the facility to better operation and maintenance. After the assistance has been completed at the facility, “total” compliance may have not been achieved, but the facility is definitely operating better. The facility has reduced periods of non-compliance, reduced levels of pollutants discharged, or has had significant increases in efficiencies such as; lower energy usage, better (and often lower) chemical usage for proper operation, and adequate financial support enabling operators to better address problems in a more timely fashion. The facility may not be in “total” compliance with its NPDES permit, but it has “significantly” increased its performance. The facility is continuing its compliance assistance efforts with the Program and the trainer is working on bringing the facility into “total” compliance with its NPDES permit, but has not achieved this status on a consistent basis.

No Improvement: Starts with the facility out of compliance with its NPDES permit at the beginning of the compliance assistance training, and continues to be out of compliance with little or no improvement. The facility has decided to continue to work with the Program to solve its compliance problems.

Attachment 2

Fields requested in MS Access Database

ID
Region
Facility Name
Facility Street Address
City/Town
State
Zip code
Start Assist Date
Compliance status at start
Conclusion Assist Date
Type of Facility
Performance Limiting Factors (in order of priority)
Repeat Assist Facility
If repeat, last assist date
Tribal assistance
Design size of plant (MGD)
Comments
Other Benefits
Permit Number
CBOD/BOD AVG - Start
CBOD/BOD AVG - End
Lbs of CBOD/BOD reduced
Nitrogen AVG - Start
Nitrogen AVG - End
Lbs of Nitrogen reduced
TSS AVG - Start
TSS AVG - End
Lbs of TSS reduced
Annual AVG Flow (MGD)

Attachment 2 continued

104(g)(1) DATABASE GUIDANCE

The following information corresponds to the data input form of the 104(g)(1) Program database.

(1a) COMPLIANCE ACHIEVED DATE: The assistance work at the facility has resulted in the facility being in compliance for at least ninety (90) days. The date entered into this field should be the day the facility continuously achieved compliance for ninety (90) days. If the compliance achieved date is entered so must the compliance achieved date.

(1b) CONCLUSION ASSISTANCE DATE: Enter the date that the assistance work has been completed at the facility. This date will be the same as or most likely after the compliance achieved date.

(2) TYPE OF FACILITY: Choose the one option that most applies to the facility using the drop-down box.

Options: AL, AS, CS, EA, L, OD, PO, RBC, SBR, SP, TF, TF/SC, WTL, OTH

AL	-	Aerated Lagoon
AS	-	Activated Sludge
CS	-	Contact Stabilization
EA	-	Extended Aeration
L	-	Lagoon
OD	-	Oxidation Ditch
PO	-	Primary Treatment Only
SBR	-	Sequencing Batch Reactors
RBC	-	Rotating Biological Contactors
SP	-	Stabilization Pond
TF	-	Trickling Filter
TF/SC	-	Trickling Filter/Solids Contact
WTL	-	Wetlands to Lagoons
OTH	-	Other {Type OTH in this field and use the comment field (4) to explain.}

(3) PERFORMANCE LIMITING FACTORS = PLFs:

Options: A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z

Up to four letters can be assigned to each facility based on the "performance limiting factors" that were found at each facility that most contributed to its non-compliance or its poor state of O&M. These should be listed from top to bottom from the PLF that most contributed to the PLF that least contributed to the facility's non-compliance or poor state of O&M. Use your best judgement in applying these factors.

- A - Poor understanding and application of process control by operator
- B - Staffing (too few staff , low pay, turnover, etc.)
- C - Support from municipality (administrative and technical)
- D - Operating budget and user charge system
- E - Operability/maintainability considerations (process flexibility, automation, standby units, alternate power source)
- F - Inflow and infiltration
- G - Lagoon leakage
- H - Process design errors (clarifiers, aerators, disinfection, etc.)
- I - Over loaded
- J - Under loaded
- K - Solids handling and sludge disposal
- L - Pretreatment, industrial dischargers, and toxics
- M - O&M manual (lack of or deficient)
- N - QA/QC problems
- O - Spare parts inventory
- P - Chemical inventory
- Q - Laboratory deficiencies (process control / NPDES testing)
- R - NPDES reporting / record keeping

- S - Equipment / unit processes broken down/inoperable
- T - Hydraulic related problems
- U - Poor aeration system
- V - Sludge accumulation
- W - Job description (performing operator evaluations without a written operator job description)
- X - Illegal dischargers / non-dischargers
- Y - Algae problems in lagoons
- Z - Other (Type OTH in this field and use the comment field (5) to explain.)

(4) REPEAT ASSISTANCE FACILITY: Indicate with either a yes or no, if this facility has been assisted by the program in the past five years. A drop-down box is present for easier data entry purposes.

(*) LAST ASSISTANCE DATE: Applies only to Repeat Assistance Facilities. If applicable indicate the date of the last conclusion assistance date - (1b) at this facility, otherwise leave blank.

(5) COMMENTS: Pertinent facility information, the type of facility - (2) or the need to expand on the type of facility, or PLFs - other (3).

(6) OTHER BENEFITS: Energy savings, cost savings, chemical addition savings, etc.

(7) POLLUTANT (CBOD/BOD, NITROGEN, & TSS) AVG. - Start: The average of the effluent monthly averages of the particular pollutant (CBOD/BOD, Nitrogen, & TSS) on the facility's Discharge Monitoring Report for the three months prior to the start of assistance date.

(8) POLLUTANT (CBOD/BOD, NITROGEN, & TSS) AVG. - End: The average of the effluent monthly averages of the particular pollutant (CBOD/BOD, Nitrogen, & TSS) on the facility's Discharge Monitoring Report for the three months after the conclusion of assistance date (1b).

(9) ANNUAL AVERAGE FLOW {MGD}: The annual average of the effluent flow, in millions of gallons per day, during the assistance period.

The Pounds of CBOD/BOD Reduced , Pounds of Nitrogen Reduced, and Pounds of TSS Reduced are fields that will automatically calculate information, data input is not required./home/ec2-user/sec/disk/omb/icr/200806-2040-002/doc/7555201