



Permitting for Environmental Results (PER)

NPDES Profile: Pacific Island Territories

PROGRAM RESPONSIBILITY

State of Pacific Island Territories: NPDES authority for the Pacific Island Territories

EPA Region 9: NPDES authority for base program, general permitting, federal facilities, pretreatment, biosolids

Program Integrity Profile

This profile characterizes key components of the National Pollutant Discharge Elimination System (NPDES) program, including program administration and implementation, environmental outcomes, enforcement, and compliance. EPA considers profiles to be an initial screen of NPDES permitting, water quality, enforcement, and compliance programs based on self evaluations by the states and a review of national data. EPA will use the profile to identify program strengths and opportunities for enhancements. For more information, contact John McCarroll, EPA Region 9, (415) 972-3774.

Section I. Program Administration

1. Resources and Overall Program Management

The EPA Region 9 Pacific Islands Office (PIO) manages the Region's environmental programs in American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands (CNMI) and provides assistance to other Pacific Island territories. Other groups provide assistance in specific technical and programmatic areas. For instance, the Clean Water Act (CWA) Standards & Permits Office is responsible for issuing NPDES permits, but the primary liaison and coordination functions with the territorial agencies and permittees are largely the responsibility of the PIO. However, for compliance monitoring and enforcement, the PIO is the lead office. An organizational chart is provided at the end of this profile.

Region 9 provides funding to American Samoa, Guam, and the CNMI on an annual basis through CWA section 106 Surface Water Grants. The PIO negotiates annual workplans with each of the Pacific Island territories of Guam, CNMI, and American Samoa. Each of the program offices works with the PIO to ensure that regional and national program priorities are included in the workplan. The PIO meets with the Pacific Island territories on at least a semi-annual basis to oversee implementation of the workplan, as well as inspecting facilities covered by the NPDES and other programs. The PIO is also in contact with the environmental agencies on a weekly basis. All significant program issues are coordinated with the respective program office.

Table 1. NPDES Universe in the Pacific Island Territories

	Major Facilities ¹	Minor Facilities w/Individual Permits ¹	Minor Facilities Covered by General Permits	SIUs (including CIUs)	CAFOs
American Samoa	4	2	0	NA	0
Commonwealth of the Northern Mariana Islands	2	0	10	NA	0
Guam	6	14	0	NA	0
% of National Universe	< 1%	< 1%	< 1%	< 1%	< 1%

1: PCS. 9/30/04

The PIO dedicates approximately 1 FTE to support the NPDES program. This includes compliance inspections and enforcement actions. The CWA Standards & Permits Office assigns about 1 FTE to issue permits and to support and assist the PIO office.

2. State Program Assistance

EPA provides assistance to State programs in several ways. The PIO meets semi-annually, on-site, with State program staff and managers to discuss NPDES compliance, water quality, and program issues. EPA provides on-site training for inspectors and enforcement staff, and other formal program-specific training, and less formal training during joint EPA/State inspection of facilities. State program staff also take advantage of off-island technical training. Compliance assistance is also provided through weekly program conference calls. The PIO has established close working relationships with State program offices and staff that facilitate NPDES program implementation. None of the Territories have expressed an interest in obtaining authorization for implementing the NPDES program.

3. EPA Activities in Indian Country

Not applicable because there is no Indian Country in the Pacific Island Territories.

4. Legal Authorities

EPA is conducting a comprehensive review of the State's legal authorities. This review has not yet been completed. As a result, EPA is reserving this section of the profile; when the legal reviews are complete, EPA will update profiles to include the results of the reviews.

EPA Region 9 implements the NPDES program in the Pacific Island territories using its authorities under the Clean Water Act.

5. Public Participation

An evaluation of the State's legal authorities regarding public participation will be included in the legal authority review. As noted above, the legal authority review section of this profile is reserved pending completion of the legal authority review.

Region 9 complies with the NPDES regulations for ensuring sufficient public participation in the NPDES permitting process by adhering to the following procedures:

- Notices of proposed action are made available for public comment in a local newspaper with a minimum comment period of 30 days. EPA also sends out the draft permit and fact sheet to the U.S. Fish and Wildlife Service and the National Marine Fisheries Service, and any other entity who may be interested in or affected directly by the permit.
- Any person may comment to EPA in writing regarding the proposed action. EPA will review the comments and respond in accordance with chapter 40 of the Code of Federal Regulations (CFR) section 124.17. Responses are retained in individual permit files for the public record. If any information submitted during the public comment period raises substantial new questions about the draft permit, a new draft permit with a revised fact sheet may be prepared, or a final permit with changes explained may be issued. If the permit is modified significantly in response to comments, the comment period may be reopened (but limited to the new findings) and the proposed permitting action may be re-public noticed.
- During the public comment period, any interested party may request a public hearing, although there has been no such request for permits issued in the Pacific Island territories. EPA would evaluate and decide on a request for a public hearing, based on a review of issues raised and the amount of public interest. The public may also appeal a final permitting decision if they have provided comments and followed the procedure by raising their concerns in a timely manner.
- All information related to the issuance of or compliance with NPDES permits are accessible by the public upon request. Significant permits are made available at our Web site, <http://www.epa.gov/region9/water/npdes/index.html>. All major permits issued since November 2002 are available on EPA's Web site, <http://cfpub.epa.gov/npdes/permitissuance/genpermits.cfm>.

6. Permit Issuance Management Strategy

The Region was able to address the significant backlog of NPDES permits with the exception of the two Guam CWA section 301(h) permits (major facilities) which are expired more than 10 years. As permit renewal dates come due, the permits are assigned to Water Division permit writers for application review and permit reissuance. Over the next two years most of the Pacific Island territories NPDES permits (approximately 20) will be coming up for renewal. There is no need for a strategy because of the relatively small number of permits. The Region has been able to maintain a current permit rate of 90%.

As mentioned above, two outstanding Guam CWA section 301(h) permits have been expired for more than 10 years. The permittee, Guam Waterworks Authority (GWA), is under a Federal Stipulated Order

for Preliminary Relief (June 2003) which, in part, requires GWA to complete designs for the extension of the ocean outfalls for both facilities and perform additional baseline survey monitoring for the new outfall locations and establishes a deadline of June 2006 to complete these activities. GWA proposed the extension of their ocean outfalls for both facilities to comply with CWA section 301(h) requirements in response to EPA’s tentative denial of their renewal application in 1997. These two Guam permits are on the Region’s priority list to address by September 2006.

The status of the NPDES permits is as follows:

Table 2. Percentage of Facilities Covered by Current Permits in the Pacific Island Territories

		2000	Nat'l Avg.	2001	Nat'l Avg.	2002	Nat'l Avg.	2003	Nat'l Avg.
American Samoa	Major Facilities	25%	74%	100%	76%	100%	83%	100%	84%
	Minor Facilities Covered by Individual Permits	0%	69%	0%	73%	0%	79%	100%	81%
	Minor Facilities Covered by Individual or Non-Stormwater General Permits	NA	NA	NA	NA	0%	85%	100%	86%
CNMI	Major Facilities	50%	74%	100%	76%	100%	83%	100%	84%
	Minor Facilities Covered by Individual Permits	0%	69%	NA	73%	NA	79%	NA	81%
	Minor facilities Covered by Individual or Non-Stormwater General Permits	NA	NA	NA	NA	100%	85%	100%	86%
Guam	Major Facilities	14%	74%	67%	76%	67%	83%	67%	84%
	Minor Facilities Covered by Individual Permits	55%	69%	93%	73%	0%	79%	100%	81%
	Minor Facilities Covered by Individual or Non-Stormwater General Permits	NA	NA	NA	NA	0%	85%	100%	86%

Source: PCS, 12/31/00; 12/31/01; 12/31/02; 12/31/03 (Values in the National Data Sources Column of the Management Report, Measures #19 and #20, are PCS data as of 6/30/04.)

7. Data Management

In FY 2004, the Region began improving data entry for Pacific Island Territory NPDES permits into EPA's Permit Compliance System (PCS). Prior to this time, due to priorities and resources, only facility data was entered into PCS. During FY 2005, the Region will begin entering all required Water Enforcement National Database (WENDB) data elements, including locational data for facilities and outfalls, into PCS.

PCS data is loaded monthly into the integrated data for enforcement analysis (IDEA) system. The Region does a quality assurance/quality control review at least quarterly. The reviews consist of runs of PCS data, Integrated Compliance Information System (ICIS), and Superdocket to compare data inputs for accuracy, timeliness, and to correct any discrepancies.

Section II. Program Implementation

1. Permit Quality

All Regional permit writers are provided training through the national Permit Writers' Training Course, and also participate in permit writers workshops to ensure that they keep abreast of recent issues of concern and EPA policies. The Region reviews the permits it issues on an ad hoc basis to check for quality. The Region does not have a formal practice of performing permit quality reviews, but relies on the review of senior permit writers or the Office Chief before public notice and during the permit finalization stage.

Fact sheets prepared in support of permits contain all the necessary information to support development of effluent limitations and other requirements included in the permits. In addition, for the four CWA section 301(h) waiver permits, documentation to grant or deny the waiver is provided in a supporting technical report.

Whole effluent toxicity (WET) testing is not routinely required in the small number of NPDES permits issued in the Pacific Island territories for several reasons: the closest commercial laboratory able to conduct routine toxicity testing using EPA-approved WET methods is located in Hawaii; import restrictions on some non-native test species utilized in EPA's WET methods; and logistical and cost issues related to the routine off-island transport of effluent samples to Hawaii or mainland commercial laboratories for WET compliance monitoring.

Nevertheless, WET requirements, including effluent limits, are included in several major NPDES permits issued in the Pacific Island territories (e.g., some CWA section 301(h) permittees) where such testing has been conducted by the EPA Region 9 Laboratory and commercial laboratories. Although the Region does not expect that development of WET testing capabilities in the Pacific Island territories will proceed at a rapid pace, the Region, in coordination with EPA's Office of Research and Development (ORD) scientists, has developed a fertilization toxicity test method which uses a tropical sea urchin species (*Tripneustes gratilla*). The Region plans to incorporate this new toxicity test into EPA's West Coast marine chronic toxicity test methods manual during the coming year and will conduct training sessions on the new method later this year for the Pacific Islands territories.

2. Pretreatment

There are no publicly owned treatment works (POTWs) in the Pacific Island territories that are required to operate a pretreatment program. POTWs are required, through their NPDES permits, to inventory users of their systems and initiate outreach/educational information on the discharge of substances to the sewer system and the effects they could have on the treatment system and the environment. No significant industrial users (SIUs) have been identified to date.

3. Concentrated Animal Feeding Operations

There are no CAFOs in the Pacific Island territories.

4. Stormwater

There are no Phase I municipal separate stormwater system (MS4) permits in Pacific Island territories. The only Phase II MS4 is Saipan, CNMI for which the Region intends to issue an individual permit. PIO is working with the local authority to develop an application, and the Region will work with the authority to develop the capacity to administer the program. The Region has issued the construction and multi-sector general permits to cover the Pacific Island territories, and has received several stormwater NOIs for Guam and CNMI. Guam has 16 (14 construction and 2 industrial) and CNMI has 5 (2 construction and 3 industrial)

5. Combined Sewer Overflows/Sanitary Sewer Overflows

The PIO is working with the local environmental agencies and utilities to address sanitary sewer overflows (SSOs). There are no combined sewer overflows (CSOs). Pacific Island utilities are required to report SSOs in accordance with NPDES permit conditions. Pacific Island environmental agencies have monitoring programs and publish notifications in newspapers or post notices whenever waters become contaminated by sewage.

EPA relies on the personal knowledge of the PIO staff to track informally the trends in SSOs and identify problems. EPA has not developed a formal tracking system, because the number of facilities with SSOs is so small. EPA's recent enforcement action against Guam requires the Guam Waterworks Authority to assess and correct sewer system deficiencies to address SSOs.

6. Biosolids

The biosolids program is implemented through the NPDES program. All sludge generated goes to designated land fills. The Pacific Island territories' environmental agencies are primarily involved in tracking facilities and compliance.

Section III. NPDES Compliance Monitoring and Enforcement Response

In a separate initiative, EPA's Office of Enforcement and Compliance Assurance, EPA Regions, and the Environmental Council of the States have developed a tool for assessing State performance in enforcement and compliance assurance to ensure that States meet agreed-upon minimum performance levels and provide a consistent level of environmental and public health protection nationwide. OECA will use the State profiles to focus these efforts and identify areas needing further discussion and evaluation. Where the State (such as the Pacific Island Territories) is not authorized to implement the NPDES program, OECA will use the above process to evaluate Regional performance in implementing the NPDES compliance and enforcement programs.

1. Enforcement Program

PIO implements the enforcement program in the Pacific Island territories. PIO conducts frequent on-site visits for technical assistance, compliance inspections, and enforcement. PIO typically follows standard EPA Region 9 NPDES compliance and enforcement procedures. PIO works closely and provides hands-on program management with State environmental agencies and regulated entities. PIO NPDES inspection policy is to target major facilities on an annual basis and minor facilities on a less frequent basis, unless the facility is in significant non-compliance. Implementation of this inspection policy is dependent on PIO resources. PIO works closely with the State environmental agencies in prioritizing annual inspections and enforcement. PIO's inspection and enforcement policy is to focus on facilities of concern. In some cases PIO is inspecting major POTW's of concern on a semi-annual basis (Guam Waterworks Authority and Commonwealth Utilities Corporation) due to operation and maintenance and compliance issues. Although trend data may be lacking with respect to Pacific Island data, inspections are being performed and coordinated with State environmental agencies on a regular basis. The local environmental agencies also perform NPDES inspections of major and minor facilities.

Where facilities are determined to be in non-compliance, PIO policy is to first look at compliance assistance to help the facility comply with regulatory requirements and improve performance. Formal enforcement actions such as notice of violations (NOVs) and Administrative Orders (AOs) are taken when compliance assistance is determined to be not effective, the situation warrants, or the facility is in significant non-compliance, as in the case of the PIO's suit against the Guam Waterworks Authority (GWA) for CWA and Safe Drinking Water Act (SDWA) non-compliance in June 2003. Prior to the suit against GWA, the PIO issued AOs for five of GWA's sewage treatment plants (early 1990s) and an Order of Consent (2001) to GWA for non-compliance that covered all of its wastewater system. The PIO also issued an AO to the Commonwealth Utilities Corporation (CUC) for one of its treatment plants in 1999 for NPDES non-compliance, and has issued NOVs for sewage overflows. In 2002, PIO issued NOVs to nine minor facilities for significant non-compliance with NPDES permit effluent limitations and provided compliance assistance to those facilities which will be resolved in 2005.

The Region's application of EPA's CWA penalty policy takes into consideration the uniqueness of the islands and their limited economic, technical, managerial, and operational capacity. Where up-front penalties are assessed, PIO policy follows EPA's penalty policy and uses supplemental environmental

projects (SEPs) whenever possible. As an example, the PIO suit against the Guam Department of Public Work for the unpermitted discharge of leachate (CWA case) included a SEP.

2. Record Keeping and Reporting

NPDES compliance files are kept for each permitted facility by the PIO. Compliance files consist of the NPDES permit, discharge monitoring reports (DMRs), permittee and EPA correspondence, and inspection reports. All DMRs are currently reviewed by PIO for compliance. All NPDES reporting is directed to the PIO. The PIO in coordination with Water Division is setting up the Pacific Islands NPDES permits for entry into Region 9's PCS system to be completed in 2005. Upon PCS setup all Pacific Island's NPDES DMR data will be inputted to PCS for compliance monitoring.

3. Inspections

The PIO also conducts periodic compliance inspections, and issues NOVs. The only federal facility with an NPDES permit in the Pacific Island territories is in Guam and is a major facility. The PIO is responsible for inspecting the federal facility. The goal is to inspect the facility annually. Local environmental agencies also assist in inspecting major and minor facilities on an annual basis.

4. Compliance Assistance

PIO program managers and technical staff are senior, professional staff that are well integrated with the programs and the communities. PIO staff review DMRs and visit the islands frequently, coordinating with island environmental agencies. The PIO engages in compliance and technical assistance directly and indirectly to the islands. PIO has a strong policy toward compliance assistance through the use of technical training, peer review and assistance to improve environmental performance. As an example, the PIO coordinated, through the American Water Works Association (AWWA) and the Water Environment Federation (WEF), implementation of a Qualserve peer review of GWA in 2002 and CUC in 2005. PIO frequently assists island utility agencies' development of technical and operational capacity by coordinating with other wastewater professionals to work with the utilities via on-site visits to provide technical assistance and training. PIO also uses its annual Pacific Islands Environmental Conference as a venue to further assist utilities by bringing out utility experts and establishing networks with other professionals, organizations, and utilities. PIO's senior staff frequently facilitates resolution of technical and engineering issues related to compliance and infrastructure projects to move utilities and other regulated facilities toward compliance. The benefits of compliance assistance activities are demonstrated by incremental improvements toward compliance with regulations and improvements in managerial and operational capacity.

Section IV. Related Water Programs and Environmental Outcomes

1. Monitoring

Guam EPA, CNMI Department of Environmental Quality, and American Samoa EPA have monitoring staff that regularly monitor surface water quality. They all implement efficient beach and coastal monitoring programs. American Samoa and Guam are initiating stream monitoring using an Environmental Monitoring and Assessment Program (EMAP) probabilistic design, and compatible protocols. EPA ORD and Region 9 have provided technical and financial support for these sampling efforts. Guam is also currently conducting coastal offshore monitoring using the probabilistic design, with support from EPA's Office of Research and Development (ORD) and Region 9. American Samoa, CNMI, and Guam participate in the comprehensive watershed management program within their respective environmental agencies.

2. Environmental Outcomes

Of the assessed waters, perhaps 75% overall are fully supporting water quality standards and 25% are impaired, usually due to nutrients and bacteria. About 50% of the waters are regularly assessed. Specific numbers are only available for American Samoa, in which 75% of stream miles have been assessed for both recreation and aquatic life and 44% of the assessed miles are impaired for swimming.

3. Water Quality Standards

EPA reviews and approves each water quality standards action taken by American Samoa, CNMI, and Guam under CWA section 303(c). The process involves working with each of the Pacific Island territories while the territory is amending its water quality standards and thoroughly reviewing the triennial submissions prior to approval. Through this process EPA ensures that the water quality standards conform to federal requirements and that implementation procedures are developed, where necessary, thus, ensuring that the standards are implementable in permits. Moreover, the fact that the water quality standards and permit programs are in the same office in the Region, ensures close coordination between standards development and permitting needs.

American Samoa has adopted enterococcus criteria for marine waters, while CNMI and Guam have adopted enterococcus for both fresh and marine waters¹. All three territories have adopted nutrient criteria². Region 9 has not encountered any particular difficulty in implementing any of the Pacific Island territories' water quality standards.

¹ The National Data Sources column of the Management Report for CNMI, measure #52, shows that CNMI did not have WQS for enterococci, as of January 28, 2004. The standard was adopted September 30, 2004 and later approved by EPA.

² The National Data Sources Column of the Management Report for all three territories, measure #53, indicates that nutrient criteria were not in place, as of January 13, 2004. The standards were adopted in March 2001 in American Samoa, July 2002 in Guam, and September 2004 in CNMI.

4. Total Maximum Daily Loads

In American Samoa, the total maximum daily load (TMDL) and permit staff are working together regarding planning of controls necessary to deal with accumulation of metals in fish tissue in Pago Pago Harbor (and assessing the relationship to ship and cannery facilities). In the CNMI and Guam, the TMDL effort and NPDES program are coordinated with each other as they are managed by the same agency. However, no TMDL has been completed in the Pacific Island territories.

5. Safe Drinking Water Act

Relevant programs under SDWA, including the Underground Injection Control (UIC) program, as well as Clean Water Act programs, such as nonpoint source (NPS) and water quality standards, come under Watershed Management and the 6217/319 Coastal Nonpoint Source Pollution Prevention Program.

PIO Organizational Chart

John McCarroll	Manager	415-972-3774
Carl Goldstein	American Samoa, US Army Kwajalein, Wake Island program manager	972-3767
Michael Lee	Wastewater issues, Guam, CNMI	972-3769
Mariela Lopez	Environmental intern (UC Berkeley)	972-3771
Ben Machol	Guam program manager	972-3770
Norwood Scott	Waste (solid and hazardous) issues, Tanks (under and above ground)	972-3373
Patricia Young	CNMI and Palau program manager	972-3775 FAX: 415-947-3560

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American Samoa

		Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
					State Activities	EPA Activities	State Activities	EPA Activities
NPDES Progress								
Universe	1	# major facilities (6,690 total)	I.1		n/a	n/a	4	
	2	# minor facilities covered by individual permits (42,057 total)	I.1		n/a	n/a	2	
	3	# minor facilities covered by non-storm water general permits (39,183 total)	I.1		n/a	n/a	0	
	4	# priority permits (TBD)	I.6			n/a	--	
	5	# pipes at facilities covered by individual permits (142,761 total)	I.7		n/a	n/a	--	
	6	# industrial facilities covered by individual permits (32,505 total)	I.1		n/a	n/a	4	
	7	# POTWs covered by individual permits (15,197 total)	I.1		n/a	n/a	2	
	8	# pretreatment programs (1,482 total)	II.2		n/a	n/a	0	
	9	# Significant Industrial Users (SIUs) discharging to pretreatment programs (22,158 total)	II.2		n/a	n/a	0	
	10	# Combined Sewer Overflow (CSO) permittees (831 total)	II.5		n/a	n/a	0	
	11	# CAFOs (current and est. future) (17,672 total)	II.3		n/a	n/a	--	
	12	# biosolids facilities (TBD '05)	II.6			n/a	--	
NPDES Program Administration	13	State or Region assessment of State NPDES program (none (N)/assessment (A)/profile (P))	I.1	50 states 2004	n/a	n/a	P	
	14	% pipes at facilities covered by individual permits w/ lat/long in PCS	I.7		46.3%	n/a	--	
	15	State CAFO legal authority expected (mo/yr)	II.3	2005	n/a	n/a	n/a	
	16	# Withdrawal petitions/legal challenges (22 total)	I.4		n/a	n/a	n/a	
	17	DMR data entry rate	I.7		95%	n/a	0%	
	18	# permit applications pending (1,011 total)	I.6		n/a	n/a	0	
NPDES Program Implementation	19	% major facilities covered by current permits	I.6	90%	83.7%	n/a	100.0%	
	20	% minor facilities covered by current individual or non-storm water general permits	I.6	90% 12/04	87.0%	n/a	100.0%	
	21	# major facilities w/permits expired >10 yrs. (56 total)	I.6		n/a	n/a	0	
	22	% priority permits issued as scheduled (TBD '05)	I.6	95% 2005		n/a	--	
	23	% pretreatment programs inspected/audited during 5 yr. inspection period	II.2		85.3%	n/a	n/a	
	24	% SIUs w/control mechanisms	II.2		99.2%	n/a	n/a	
	25	% of CSO permittees with long-term control plans developed or required	II.5	75% 2008	82.2%	n/a	n/a	
	26	% CAFOs covered by NPDES permits	II.3		35%	n/a	--	
	27	% biosolids facilities that have satisfied part 503 requirements (TBD '05)	II.6			n/a	--	
	28	# Phase I storm water permits issued but not current (76 total)	II.4		n/a	n/a	0	
	29	# Phase I storm water permits not yet issued (5 total)	II.4		n/a	n/a	0	
	30	Phase II storm water small MS4 permits current (Y/N/D (draft)) (35 States)	II.4	100% states 2008	n/a	n/a	n/a	
	31	Phase II storm water construction permit current (Y/N/D (draft)) (49 States)	II.4	100% states 2008	n/a	n/a	Y	
NPDES Compliance Monitoring and Enforcement Response	32	% major facilities inspected	III.3		71%	0%	0%	
	33	(inspections at minors) / (total inspections at majors and minors)	III.3		76%	n/a	n/a	
	34	% major facilities in significant non-compliance (SNC)	III.1		20%	n/a	0%	
	35	% SNCs addressed by formal enforcement action (FEA)	III.1		14%	n/a	n/a	
	36	% SNCs returned to compliance w/o FEA	III.1		70%	n/a	n/a	
	37	# FEAs at major facilities (666 total)	III.1		n/a	0	0	
	38	# FEAs at minor facilities (1,660 total)	III.1		n/a	0	0	

Explanation of Column Headers:

Profile Section: For each measure, this column lists the section of the profile where the program area (including any additional data for the measure) is discussed.

National Data Sources: The information in these two columns is drawn from two types of sources:

(1) EPA-managed databases of record for the national water program, such as PCS, the National Assessment Database, and the National TMDL Tracking System. NPDES authorities are responsible for populating PCS with required data elements and for assuring the quality of the data. EPA is working to phase in full use of NAD and NTTs as national databases.

(2) Other tracking information maintained by EPA Headquarters for program areas such as CAFOs, CSOs, and storm water.

The [definitions document](#) accompanying this Management Report provides a detailed definition of each data element in the National Data Sources columns.

Additional Data: These columns provide additional data in cases where information from other data sources differs from information in the National Data Sources column for reasons such as different timing of the data "snapshot." Additional data should generally adhere to the same narrative definitions as data in the National Data Sources, and should be derived using similar processes and criteria. Our goal is to work with the States on these discrepancies to ensure consistent and accurate reporting. A State contact is available who can respond to queries. The profiles discuss each additional data element.

State Activities: Information in these columns reflects activities conducted by the State program. (Shaded cells in these columns indicate that the work may not be entirely the State's responsibility, but a breakdown of the data into EPA and State responsibilities is unavailable.)

EPA Activities: Information in these columns reflects activities conducted by the EPA Region within the State.

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American Samoa

		Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
					State Activities	EPA Activities	State Activities	EPA Activities
Water Quality Progress								
Universe	39	River/stream miles (3,419,857 total)	IV.2		n/a	142,457	n/a	
	40	Lake acres (27,775,301 total)	IV.2		n/a	120,292	n/a	
	41	Total # TMDLs in docket at end of FY 2003 (52,795 total)	IV.4		n/a	1	--	
	42	# TMDLs committed to in FY 2003 management agreement (2,435 total)	IV.4		n/a	n/a	n/a	
	43	# Watersheds (2,341 total)	IV.2		n/a	--	--	
Water Quality Administration	44	On-time Water Quality Standards (WQS) triennial review completed (42 States)	IV.3		n/a	Y	n/a	
	45	# WQS submissions that have not been fully acted on after 90 days (32 total)	IV.3	<25% submissions	n/a	n/a	0	
Water Quality Implementation	46	State is implementing a comprehensive monitoring strategy (Y/N) (TBD)	IV.1	all states 2005	--	--	--	
	47	% river/stream miles assessed for recreation	IV.2		13.8%	75.0%	n/a	
	48	% river/stream miles assessed for aquatic life	IV.2		22.0%	75.0%	n/a	
	49	% lake acres assessed for recreation	IV.2		49.4%	--	n/a	
	50	% lake acres assessed for aquatic life	IV.2		48.5%	--	n/a	
	51	# outstanding WQS disapprovals (23 total)	IV.3		n/a	0	n/a	
	52	WQS for E. coli or enterococci for coastal recreational waters (12 States)	IV.3	35 states 2008	n/a	Y	n/a	
	53	WQS for nutrients or Nutrient Criteria Plan in place (13 States)	IV.3	25 states 2008	n/a	N	n/a	Y
	54	Cumulative # TMDLs completed through FY 2003 (10,807 total)	IV.4		n/a	--	--	
	55	# TMDLs completed in FY 2003 (2,929 total)	IV.4		n/a	0	0	
Environmental Outcomes	56	# TMDLs completed through FY 2003 that include at least one point source WLA (5,036 total)	IV.4		n/a	--	--	
	57	% Assessed river/stream miles impaired for swimming in 2000	IV.2		--	44.0%	n/a	
	58	% Assessed lake acres impaired for swimming in 2000	IV.2		--	3.4%	n/a	
	59	# Watersheds in which at least 20% of the water segments have been assessed and, of those assessed, 80% or more are meeting WQS (440 total)	IV.2	600 2008	n/a	--	--	

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NPDES Management Report, Fall 2005

Guam

			Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
						State Activities	EPA Activities	State Activities	EPA Activities
NPDES Progress									
Universe	1	# major facilities (6,690 total)	I.1		n/a	n/a	6		
	2	# minor facilities covered by individual permits (42,057 total)	I.1		n/a	n/a	14		
	3	# minor facilities covered by non-storm water general permits (39,183 total)	I.1		n/a	n/a	0		
	4	# priority permits (TBD)	I.6			n/a	--		
	5	# pipes at facilities covered by individual permits (142,761 total)	I.7		n/a	n/a	--		
	6	# industrial facilities covered by individual permits (32,505 total)	I.1		n/a	n/a	14		
	7	# POTWs covered by individual permits (15,197 total)	I.1		n/a	n/a	5		
	8	# pretreatment programs (1,482 total)	II.2		n/a	n/a	0		
	9	# Significant Industrial Users (SIUs) discharging to pretreatment programs (22,158 total)	II.2		n/a	n/a	0		
	10	# Combined Sewer Overflow (CSO) permittees (831 total)	II.5		n/a	n/a	0		
	11	# CAFOs (current and est. future) (17,672 total)	II.3		n/a	n/a	--		
	12	# biosolids facilities (TBD '05)	II.6			n/a	--		
NPDES Program Administration	13	State or Region assessment of State NPDES program (none (N)/assessment (A)/profile (P))	I.1	50 states 2004	n/a	n/a	P		
	14	% pipes at facilities covered by individual permits w/ lat/long in PCS	I.7		46.3%	n/a	--		
	15	State CAFO legal authority expected (mo/yr)	II.3	2005	n/a	n/a	n/a		
	16	# Withdrawal petitions/legal challenges (22 total)	I.4		n/a	n/a	n/a		
	17	DMR data entry rate	I.7		95%	n/a	0%		
	18	# permit applications pending (1,011 total)	I.6		n/a	n/a	0		
NPDES Program Implementation	19	% major facilities covered by current permits	I.6	90%	83.7%	n/a	66.7%		
	20	% minor facilities covered by current individual or non-storm water general permits	I.6	90% 12/04	87.0%	n/a	100.0%		
	21	# major facilities w/permits expired >10 yrs. (56 total)	I.6		n/a	n/a	2		
	22	% priority permits issued as scheduled (TBD '05)	I.6	95% 2005		n/a	--		
	23	% pretreatment programs inspected/audited during 5 yr. inspection period	II.2		85.3%	n/a	n/a		
	24	% SIUs w/control mechanisms	II.2		99.2%	n/a	n/a		
	25	% of CSO permittees with long-term control plans developed or required	II.5	75% 2008	82.2%	n/a	n/a		
	26	% CAFOs covered by NPDES permits	II.3		35%	n/a	--		
	27	% biosolids facilities that have satisfied part 503 requirements (TBD '05)	II.6			n/a	--		
	28	# Phase I storm water permits issued but not current (76 total)	II.4		n/a	n/a	0		
	29	# Phase I storm water permits not yet issued (5 total)	II.4		n/a	n/a	0		
	30	Phase II storm water small MS4 permits current (Y/N/D (draft)) (35 States)	II.4	100% states 2008	n/a	n/a	n/a		
	31	Phase II storm water construction permit current (Y/N/D (draft)) (49 States)	II.4	100% states 2008	n/a	n/a	Y		
NPDES Compliance Monitoring and Enforcement Response	32	% major facilities inspected	III.3		71%	0%	67%		
	33	(inspections at minors) / (total inspections at majors and minors)	III.3		76%	n/a	33%		
	34	% major facilities in significant non-compliance (SNC)	III.1		20%	n/a	0%		
	35	% SNCs addressed by formal enforcement action (FEA)	III.1		14%	n/a	n/a		
	36	% SNCs returned to compliance w/o FEA	III.1		70%	n/a	n/a		
	37	# FEAs at major facilities (666 total)	III.1		n/a	0	0		
	38	# FEAs at minor facilities (1,660 total)	III.1		n/a	0	0		

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NPDES Management Report, Fall 2005

Guam

		Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
					State Activities	EPA Activities	State Activities	EPA Activities
Water Quality Progress								
Universe	39	River/stream miles (3,419,857 total)	IV.2		n/a	--	n/a	
	40	Lake acres (27,775,301 total)	IV.2		n/a	--	n/a	
	41	Total # TMDLs in docket at end of FY 2003 (52,795 total)	IV.4		n/a	6	--	
	42	# TMDLs committed to in FY 2003 management agreement (2,435 total)	IV.4		n/a	n/a	n/a	
	43	# Watersheds (2,341 total)	IV.2		n/a	--	--	
Water Quality Administration	44	On-time Water Quality Standards (WQS) triennial review completed (42 States)	IV.3		n/a	Y	n/a	
	45	# WQS submissions that have not been fully acted on after 90 days (32 total)	IV.3	<25% submissions	n/a	n/a	0	
Water Quality Implementation	46	State is implementing a comprehensive monitoring strategy (Y/N) (TBD)	IV.1	all states 2005	--	--	--	
	47	% river/stream miles assessed for recreation	IV.2		13.8%	0.0%	n/a	
	48	% river/stream miles assessed for aquatic life	IV.2		22.0%	0.0%	n/a	
	49	% lake acres assessed for recreation	IV.2		49.4%	--	n/a	
	50	% lake acres assessed for aquatic life	IV.2		48.5%	--	n/a	
	51	# outstanding WQS disapprovals (23 total)	IV.3		n/a	0	n/a	
	52	WQS for E. coli or enterococci for coastal recreational waters (12 States)	IV.3	35 states 2008	n/a	Y	n/a	
	53	WQS for nutrients or Nutrient Criteria Plan in place (13 States)	IV.3	25 states 2008	n/a	N	n/a	Y
	54	Cumulative # TMDLs completed through FY 2003 (10,807 total)	IV.4		n/a	--	--	
	55	# TMDLs completed in FY 2003 (2,929 total)	IV.4		n/a	0	0	
Environmental Outcomes	56	# TMDLs completed through FY 2003 that include at least one point source WLA (5,036 total)	IV.4		n/a	--	--	
	57	% Assessed river/stream miles impaired for swimming in 2000	IV.2		--	--	n/a	
	58	% Assessed lake acres impaired for swimming in 2000	IV.2		--	--	n/a	
	59	# Watersheds in which at least 20% of the water segments have been assessed and, of those assessed, 80% or more are meeting WQS (440 total)	IV.2	600 2008	n/a	--	--	

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NPDES Management Report, Fall 2005

Northern Marianas Islands

		Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
					State Activities	EPA Activities	State Activities	EPA Activities
NPDES Progress								
Universe	1	# major facilities (6,690 total)	I.1		n/a	n/a	2	
	2	# minor facilities covered by individual permits (42,057 total)	I.1		n/a	n/a	0	
	3	# minor facilities covered by non-storm water general permits (39,183 total)	I.1		n/a	n/a	10	
	4	# priority permits (TBD)	I.6			n/a	--	
	5	# pipes at facilities covered by individual permits (142,761 total)	I.7		n/a	n/a	--	
	6	# industrial facilities covered by individual permits (32,505 total)	I.1		n/a	n/a	0	
	7	# POTWs covered by individual permits (15,197 total)	I.1		n/a	n/a	2	
	8	# pretreatment programs (1,482 total)	II.2		n/a	n/a	0	
	9	# Significant Industrial Users (SIUs) discharging to pretreatment programs (22,158 total)	II.2		n/a	n/a	0	
	10	# Combined Sewer Overflow (CSO) permittees (831 total)	II.5		n/a	n/a	0	
	11	# CAFOs (current and est. future) (17,672 total)	II.3		n/a	n/a	--	
	12	# biosolids facilities (TBD '05)	II.6			n/a	--	
NPDES Program Administration	13	State or Region assessment of State NPDES program (none (N)/assessment (A)/profile (P))	I.1	50 states 2004	n/a	n/a	P	
	14	% pipes at facilities covered by individual permits w/ lat/long in PCS	I.7		46.3%	n/a	--	
	15	State CAFO legal authority expected (mo/yr)	II.3	2005	n/a	n/a	n/a	
	16	# Withdrawal petitions/legal challenges (22 total)	I.4		n/a	n/a	n/a	
	17	DMR data entry rate	I.7		95%	n/a	--	
	18	# permit applications pending (1,011 total)	I.6		n/a	n/a	0	
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