



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF WATER

**MEMORANDUM**

**SUBJECT:** Information Concerning 2022 Clean Water Act Section 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions

**FROM** John Goodin, Director  
Office of Wetlands, Oceans, and Watersheds

**TO:** Water Division Directors, Regions 1 – 10

I am pleased to provide you with information to assist you and the states and territories (hereinafter referred to as “states”) in your EPA Region to prepare for timely submittal and review of the 2022 Integrated Reports (IRs) developed in accordance with Clean Water Action (CWA) Sections 303(d), 305(b), and 314. This memorandum includes: 1) a compilation of strategies to achieve timely submittal of state IRs and timely EPA review of CWA Section 303(d) lists; 2) an update on EPA’s Assessment and Total Maximum Daily Load Tracking and Implementation System (ATTAINS); 3) a discussion of IRs in the context of the 50<sup>th</sup> Anniversary of the CWA and evaluating the accomplishments of state and EPA efforts to implement the CWA Section 303(d) Program Vision; and 4) a focus on the role that the 2022 IRs may play in communicating Vision priorities.

Timely submittal of IRs and action on CWA Section 303(d) lists are critical to meet states’ and EPA’s responsibilities under the CWA and are central to demonstrating success in accomplishing state and EPA strategic goals for restoring and maintaining the nation’s waters. Furthermore, timely submittal and action provide the public and other stakeholders with the most up-to-date information on the water quality condition of waters in each state. Among other things, they ensure that EPA includes states’ most current water quality information in its periodic updates to the CWA Section 106 allocation variable portion formula and biennial CWA Section 305(b) national water quality report to Congress. This memorandum was developed in part to help advance the efforts of a State-EPA Water Quality Reporting Workgroup, a collaboration among EPA, individual states, the Environmental Council of States, and the Association of Clean Water Administrators; the memorandum provides information useful to states and EPA Regions to help meet the workgroup’s goal that “all States submit 2022 CWA 303(d) lists by April 1, 2022, and EPA acts on all State submittals within 30 days.”

We are issuing the 2022 IR memorandum a year in advance of the 2022 IR reporting deadline (April 1, 2022) to allow states and EPA the opportunity to consider the four topics discussed in the memorandum for the 2022 reporting cycle. This memorandum is not regulation and does not impose legally binding requirements on EPA or states. EPA recommends that states prepare their 2022 IRs consistent with previous IR memoranda and this memorandum, which will be available at:

<https://www.epa.gov/tmdl/integrated-reporting-guidance-under-cwa-sections-303d-305b-and-314>.

Please share this memorandum with your state members.

I appreciate your continued hard work and dedication in working with states to develop IRs to help EPA report to the public the status of the nation's waters, and for being a part of the mission set forth by the CWA almost 50 years ago. If you have any questions or comments concerning this memorandum, please contact me or have your staff contact Emily Cira in the Watershed Branch at [cira.emily@epa.gov](mailto:cira.emily@epa.gov) or (202) 566-2835.

Attachment

cc: Lab Services and Applied Sciences Division Directors  
Regional Section 303(d) Coordinators  
Regional Data Management Coordinators  
Regional Monitoring Coordinators  
Don Welsh, Environmental Council of the States  
Julia Anastasio, Association of Clean Water Administrators

## INFORMATION CONCERNING 2022 CLEAN WATER ACT SECTIONS 303(d), 305(b), AND 314 INTEGRATED REPORTING AND LISTING DECISIONS

### 1. Compilation of practices to achieve on-time submittal of Integrated Reports and EPA review of Section 303(d) lists

The U.S. Environmental Protection Agency (EPA) and states need to continue efforts to provide on-time state Integrated Report (IR) submittals (all 56 states and territories<sup>1</sup> by April 1, 2022) and EPA action on state Clean Water Act (CWA) Section 303(d) lists (CWA 303(d) lists) within 30 days of their submission. See 40 CFR Sections 130.7(d) and 130.10(a)(1), and CWA Sections 303(d)(2) and 305(b)(1). While states and EPA have made some progress toward timely submittal and action over the years, there are still challenges and opportunities for improvement. Beginning in FY18, EPA started to systematically track timeliness of state submissions and EPA actions at a national level as part of Agency efforts to promote continuous improvement. EPA has implemented strategies, including some listed below, to reduce the backlog of EPA actions on CWA 303(d) lists (where EPA has not taken action within 30 days); this backlog has been reduced from 25 pending actions at the beginning of FY18 to zero in FY21 (one as of March 1, 2021). Since 2018, the number of overdue state submissions has been cut by half. Nonetheless, as of March 1, 2021, less than 60 percent of states had submitted their 2020 IRs and several states had yet to submit their IRs from earlier cycles.

Timely submittal of IRs and action on CWA 303(d) lists are critical to meet states' and EPA's responsibilities under the CWA and are central to demonstrating success in accomplishing state and EPA strategic goals for restoring and maintaining the quality of the nation's waters. Furthermore, timely submittal and action provide the public and other stakeholders the most up-to-date information on the water quality condition of waters in each state and ensure that EPA includes states' most current water quality information in its biennial national water quality report to Congress.

For the 2022 reporting cycle, below is a compilation of some of the practices that various states and EPA Regions have employed to help facilitate the submission of IRs and action on CWA 303(d) lists in a timely manner.<sup>2</sup> While the integrated reporting process includes a number of common elements, a uniform approach to adoption of particular strategies and timelines for IR development and action on CWA 303(d) lists is not feasible given state-specific differences in water quality standards (WQS), assessment methodologies, review and comment schedules, and state processes and rules. EPA Regions should evaluate these and other practices, work with their states, and jointly pursue an approach that works best with state-specific circumstances. EPA has collaborated with several states, the Environmental Council of States, and the Association of Clean Water Administrators to develop a "State-Region Milestone Targets Template," and encourages EPA Regions to engage in a dialogue with each state, using the template to facilitate development of tailored plans for state submittal of timely 2022 CWA 303(d) lists and timely EPA action on those lists.

- **Open communication between states and EPA.** Open communication between states and EPA Regions is the cornerstone of a cooperative relationship. By maintaining close communication and enhancing early engagement throughout the IR cycle, states and EPA can ensure that there are no

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<sup>1</sup> In the remainder of this document, *states* refer to states, territories, and authorized tribes unless otherwise noted.

<sup>2</sup> Many of these practices are discussed in more detail in previous Integrated Reporting Memoranda, which may be found at <https://www.epa.gov/tmdl/integrated-reporting-guidance-under-cwa-sections-303d-305b-and-314>.

surprises in submitted IRs and that states and EPA can work through complex issues before final IRs are submitted. Early upload of IR data through the Assessment, Total Maximum Daily Load Tracking and Implementation System (ATTAINS) (prior to final submittal and/or during public comment) is one tool states can use to facilitate this communication and to address any data discrepancies before the official submittal deadline. States and EPA Regions have the opportunity to document agreements in writing on selected topics, including through the use of the template identified above.

- **Clarity in state requests for data/information and public participation.** As part of the IR development process, states are required to assemble and evaluate all readily available water quality-related data and information, and to provide for public participation in the development of their IRs. By including expectations for data and information that may be submitted or referenced, a state may reduce the time needed to evaluate and use data and information and develop an appropriate response to public comments.
- **State use of a “cut-off” date.** Establishing a reasonable “cut-off” date (e.g., a deadline for submittal of the data and information or public comment opportunity) can be a useful approach for timely completion of an IR. For example, setting a “cut-off” date for data and information used in preparation of a draft CWA 303(d) list, after which additional data or information would be considered in preparing a subsequent draft CWA 303(d) list, can encourage third-parties to submit timely data and information and facilitate the timely completion of the state’s remaining process. If electing to use a “cut-off” date, a state should clearly explain that data and information submitted after that date would be considered during the next listing cycle.
- **Leveraging on-time IR submittals with formal agreements.** Formal mechanisms between states and EPA Regions such as Memoranda of Agreements, annual workplans, Continuing Planning Process updates, Performance Partnership Agreements, and/or CWA Section 106 grant annual commitments can be used to formalize a coordinated approach and help emphasize the importance of timely IR submittals at all appropriate management levels within a state and EPA Region.
- **Combined state IR submissions.** States are required to maintain a biennial reporting cycle of submitting IRs by April 1 of even-numbered years. If a state is significantly behind in submitting an IR, one option to catch-up with a late submission while also meeting the reporting deadline for the current IR cycle is to combine the IR submissions (for example, submit a combined 2020/2022 IR by April 1, 2022). Articulation of this strategy is not intended to obviate the requirement to submit an IR every two years, nor is it intended to offer an opportunity to slow down preparation of CWA 303(d) lists moving forward. Rather, the strategy of combining IRs has been employed for states to catch-up on their past CWA 303(d) lists, submit their current cycle IR on-time, and maintain the biennial reporting cycle with an April 1 deadline moving forward. EPA recognizes that states have a variety of state-specific processes and circumstances to address when developing their IRs and are in varying stages of the IR development process – thus, EPA acknowledges that use of this strategy will be evaluated on a case-by-case basis. To facilitate use of this strategy, EPA has added the functionality to ATTAINS to support combined IR cycle submissions. A combined submission would reflect the most current assessment determinations (i.e., it would not include different assessment determinations for the cycles covered in the submission). States interested in submitting a combined IR to get back on track with the April 1 reporting deadline should work closely with

their regional listing and data management contacts to evaluate feasibility of this option in particular circumstances.

- **Combined EPA actions.** EPA Regions may consider a combined action on CWA 303(d) lists. For example, EPA Regions may consider taking a combined action on a state's CWA 303(d) list from a previous cycle (i.e., a backlogged CWA 303(d) list EPA has not acted on yet) and the state's CWA 303(d) list from the current cycle. Also, EPA Regions would take a combined action on a state's CWA 303(d) lists where the state submits a combined (i.e., multi-cycle) IR.
- **Inclusion of key supporting information in state IR submissions.** Along with providing up front all required information in the IR submittal (such as a technical rationale for any decision not to use available data or information in a listing decision), providing recommended elements (such as summary rationales for each delisting) with the IR submission can facilitate EPA's timely action on the CWA 303(d) list. This practice may reduce or eliminate the time states may need to spend responding to EPA's requests for additional information (40 CFR 130.7(b)(6)(iv)), particularly if this information has not been previously discussed between a state and EPA Region. Generally, where states provide clear explanations for their impairment determinations, including clear responses to public comments, EPA is in a better position to act quickly on the CWA 303(d) list. States and EPA Regions should discuss these expectations prior to the submittal deadline.
- **Take a partial approval/further review pending action.** The "partial approval/further review pending" action is a tool EPA Regions may choose to use to expedite approval of states' CWA 303(d) lists where a single waterbody (or small number of waterbodies) remains the subject of discussion on its status. As described in EPA's earlier IR memoranda, "Regions may consider a partial approval...and defer action on a small set of waters if additional discussion between EPA and the state is expected to resolve the disposition of those waters."<sup>3</sup> EPA introduced this tool to avoid circumstances under which states and EPA may enter into protracted discussions over the status of a few waters in the state and either the state would delay its submission, or EPA would delay its action pending resolution of the issue.
- **State use of EPA support.** In addition to the day-to-day interactions with states on IR issues, EPA provides other means of support to states covering a variety of topics related to the IR process. For example, EPA hosts workshops such as the National Training Workshop for CWA Section 303(d) Listing and Total Maximum Daily Load (TMDL) Staff, the National Water Quality Data Management Training Workshop, and the National Aquatic Resource Surveys national and regional training meetings. In addition, EPA Regions have annual or periodic meetings with their states to discuss monitoring, assessment, listing, and reporting issues. These venues provide valuable opportunities to share information among states, regional offices, and headquarters, but are also opportunities for states to support each other, by building connections and sharing information.
- **States and EPA exercise opportunities for process improvement.** Process improvement methods can be used to identify, analyze, and improve existing processes within and across an organization to meet defined goals and objectives. For example, Lean Management System principles are currently being implemented across EPA through the EPA Lean Management System (ELMS) as a means to

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<sup>3</sup> *Information Concerning 2010 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions* at 6 (providing additional detail on the use of the deferral approach).

promote continuous improvement. Lean events and ELMS tools and resources have been useful for both state and EPA offices in helping streamline the CWA Section 303(d)/Section 305(b) IR process by identifying and addressing procedural challenges and redundancies. EPA may be able to provide support for Lean events and ELMS resources. EPA will consider facilitating discussions/presentations on successful Lean processes for IRs, including lessons learned, at an upcoming national meeting with states. For more information contact an ELMS Champion in your EPA Region or see the EPA Lean Management System Fact Sheet.<sup>4</sup>

## 2. ATTAINS Update

Commencing with the 2018 cycle, EPA expects all IR submissions will be submitted electronically to EPA via ATTAINS, an online system for accessing information about the conditions in the nation's surface waters. ATTAINS holds 1) the submittal of the CWA 303(d) list and supporting information along with the associated EPA action, and 2) the CWA Section 305(b) assessed waters information.

EPA recognizes and appreciates the commitment states have placed on the transition to the new ATTAINS for reporting both assessment unit level decisions and statewide statistical survey results. As of March 2021, 54 out of 56 states and territories have provided electronic data through ATTAINS, and although some of these data have followed an earlier paper submission it is a good indicator of the efforts the states and EPA Regions have invested in transitioning to ATTAINS. Electronic IR submission has a number of advantages such as allowing EPA and states to process and transmit information in a more timely manner for stakeholders through How's My Waterway, contributing to the National Water Quality Inventory Report to Congress, and supporting analysis of actions to protect and restore waters and track progress toward that goal. In addition, electronic reporting helps ensure data is correct and consistent through time and increases capabilities in state programs due to the availability of data in an electronic, web-friendly format. EPA will continue to work with states to transition to ATTAINS, assist states in correcting any errors, and provide training to state staff on how to enter data into the system. Regional data management coordinators<sup>5</sup> are available to provide training or other tailored assistance. Development of additional functionality and iterative improvements in ATTAINS is an ongoing process in coordination with states and EPA Regions through the ATTAINS Design Team.

An additional benefit of moving to electronic reporting is reducing the size of the narrative report. However, some states may choose to provide additional pertinent information in the narrative report. To further assist states and EPA Regions in the submittal and review process using ATTAINS, and to meet a request from states and EPA Regions, Table 1 shows how ATTAINS can support integrated reporting. The table also summarizes the relationship between data and information reporting elements in ATTAINS and under CWA Sections 303(d), 305(b) and 314. For additional information on these reporting elements, see *Guidance for 2006 Assessment, Listing, and Reporting Requirements Pursuant to Sections 303(d), 305(b), and 314 of the Clean Water Act*.<sup>6</sup>

ATTAINS also serves as a national repository for approved TMDL documents and other accepted plans (e.g., "Alternative Restoration Approaches" and "Protection" plans). Complete submission of this information into ATTAINS will foster greater transparency of data across states, provide consistent

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<sup>4</sup> <https://www.epa.gov/aboutepa/epa-lean-management-system-elms-fact-sheet>

<sup>5</sup> <https://www.epa.gov/waterdata/data-management-coordinators-dmc>

<sup>6</sup> <https://www.epa.gov/sites/production/files/2015-10/documents/2006irg-report.pdf>

information to the public, and ensure accurate performance measures calculations for EPA. Whether this information is entered by the state or EPA varies by region. States are advised to contact their regional data management coordinator or TMDL lead for additional information.

EPA also strongly encourages states to continue to develop and submit geospatial representations of any assessment units that are reflected in their IRs, have approved TMDLs, and/or have other accepted plans. Accurate submission of this information in combination with the assessment information in ATTAINS will foster greater availability and transparency of data across states and be used to complete measures calculations for state and EPA Strategic Plans and other core performance measures. Submission of geospatial data will ensure accurate representation of associated waterbodies through web services and applications like How's My Waterway.

### **3. 50<sup>th</sup> Anniversary of the Clean Water Act**

States and EPA will mark the 50<sup>th</sup> Anniversary of the CWA in 2022. This milestone anniversary is a great opportunity for state and EPA water programs to tell the story of progress made over the past 50 years to restore and protect the nation's waters and what challenges remain to be addressed. Timely information from the 2022 IR cycle, complemented by results from the EPA, state, and tribal National Aquatic Resource Surveys, will be important for informing the public on the current status of the nation's waters at local, state, and national levels.

The 50<sup>th</sup> Anniversary of the CWA also coincides with evaluating the accomplishments of states' and EPA's efforts to implement the Section 303(d) Program's Long-Term Vision.<sup>7</sup> Timely IR submittals and EPA action on CWA 303(d) lists for the 2022 reporting cycle are necessary for meeting state's and EPA's responsibilities under the CWA and will help document Program achievements of the Long-term Vision. Furthermore, achieving on-time submittals will set the stage for the Program to maintain a consistent track record of timeliness into the next era of the Program and the CWA.

### **4. Early Planning and Engagement in Defining Vision Priorities**

Consistent with the CWA Section 303(d) Program Vision issued in December 2013, states identified long-term priorities through FY22. Setting long-term CWA Section 303(d) priorities provided states an opportunity to strategically focus their efforts and demonstrate progress over time in achieving environmental results. EPA encourages states to continue to communicate and actively engage with the public and other implementation partners on the process for identifying Vision priorities. The 2022 IR provides states with an opportunity to continue to communicate about their CWA Section 303(d) Vision priorities, including priorities post-FY22.<sup>8</sup>

EPA will continue to support states in identifying priorities that reflect a meaningful plan or roadmap on how best to meet their on-going CWA Section 303(d) Program requirements. EPA encourages states to consider various factors – ranging from public interest, equity, environmental considerations such as environmental justice and climate change, and resource implications, in addition to the statutory factors

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<sup>7</sup> <https://www.epa.gov/tmdl/new-vision-implementing-cwa-section-303d-impaired-waters-program-responsibilities>

<sup>8</sup> We recognize state CWA 303(d) Programs have several important tasks for 2022 – including submitting their CWA 303(d) lists on time and putting in place long-term Vision TMDLs and other plans by the end of FY2022 – and thus may need to place less priority on a detailed treatment of future Vision priorities in 2022 IRs.

of severity of the pollution and uses of impaired waters – to inform their Vision priorities. Multiple resources and tools are available for states to use to conduct their analyses. For example, EPA's Recovery Potential Screening (RPS) Tool<sup>9</sup> and Watershed Index Online (WSIO)<sup>10</sup> are useful resources for comparing restorability of impaired waters across various watersheds. Additionally, the Environmental Law Institute's Overview of State CWA 303(d) Program Vision Prioritization Frameworks<sup>11</sup> can provide additional information to help guide program planning and implementation post-FY22. For additional information on prioritization, including the distinction between the long-term priorities under the 2013 Vision and the required priority ranking of listed waters, see *Information Concerning 2016 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions*.<sup>12</sup>

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<sup>9</sup> <https://www.epa.gov/rps>

<sup>10</sup> <https://www.epa.gov/wsio/watershed-index-online-wsio-national-watershed-data-library-and-tool>

<sup>11</sup> <https://www.eli.org/freshwater-ocean/state-and-territorial-prioritization-frameworks>

<sup>12</sup> [https://www.epa.gov/sites/production/files/2015-10/documents/2016-ir-memo-and-cover-memo-8\\_13\\_2015.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/2016-ir-memo-and-cover-memo-8_13_2015.pdf)



**TABLE 1. RELATIONSHIP OF ATTAINS TO INTEGRATED REPORT ELEMENTS**

<b>Reporting Element</b>	<b>Format</b>
<b>Executive Summary</b>	Reports can be generated in ATTAINS; additional narrative can be uploaded to ATTAINS
<b>Part A. Introduction</b>	Narrative; upload to ATTAINS
<b>Part B. Background Information</b>	
<b>B.1 Total Waters</b>	Summary tables can be generated in ATTAINS; additional narrative can be uploaded to ATTAINS
<b>B.2 Water Pollution Control Program</b>	
<ul style="list-style-type: none"> <li><i>Description of CWA pollution control programs</i></li> </ul>	Narrative; upload to ATTAINS
<ul style="list-style-type: none"> <li><i>An estimate of the extent to which CWA control programs have improved water quality or will improve water quality, and recommendations for future actions necessary and identifications of waters needing action. (40 CFR 130.8(b)(2))</i></li> </ul>	Summaries can be generated in ATTAINS; additional narrative discussion can be uploaded to ATTAINS
<ul style="list-style-type: none"> <li><i>A description of the nature and extent of nonpoint source pollution and recommendations of programs needed to control each category of nonpoint sources, including an estimate of implementation costs (40 CFR 130.8(b)(4))</i></li> </ul>	Narrative; upload to ATTAINS
<ul style="list-style-type: none"> <li><i>An estimate of the environmental, economic and social costs and benefits needed to achieve the objectives of the CWA and an estimate of the date of such achievement (40 CFR 130.8(b)(3))</i></li> </ul>	Narrative; upload to ATTAINS
<b>B.3 Special State Concerns and Recommendations</b>	Narrative; upload to ATTAINS
<b>Part C. Surface Water Monitoring and Assessment</b>	
<b>C.1 Monitoring Program</b>	Narrative; upload to ATTAINS
<b>C.2 Assessment Methodology</b>	
<ul style="list-style-type: none"> <li><i>Description of data and information used to make attainment determinations (40 CFR 130.7(b)(6)(ii))</i></li> </ul>	Narrative; upload to ATTAINS
<ul style="list-style-type: none"> <li><i>Description of how data and information was used to make attainment determinations (40 CFR 130.7(b)(6)(i))</i></li> </ul>	Narrative; upload to ATTAINS
<ul style="list-style-type: none"> <li><i>A rationale for any decision to not use any existing and readily available data and information (40 CFR 130.7(b)(6)(iii))</i></li> </ul>	Narrative; upload to ATTAINS
<ul style="list-style-type: none"> <li><i>Description of changes in assessment methodology since the last reporting cycle</i></li> </ul>	Narrative; upload to ATTAINS
<b>C.3 Assessment Results</b>	
<ul style="list-style-type: none"> <li><i>Five-part categorization of waters</i></li> </ul>	Captured in ATTAINS

**TABLE 1. CONTINUED**

<b>Reporting Element</b>	<b>Format</b>
<ul style="list-style-type: none"> <li><i>Description of water quality of all waters of the US and the extent to which the quality of waters provides for protection and propagation of a balanced population of shellfish, fish, and wildlife and allows recreational activities in and on the water (e.g., results of probability-based/statistical surveys) (40 CFR 130.8 (b)(1))</i></li> </ul>	Captured in ATTAINS
<ul style="list-style-type: none"> <li><i>Changes from previous CWA 303(d) list (e.g. the water bodies/pollutants that have been added and the water bodies/pollutants that have been delisted and the reason for their delisting)</i></li> </ul>	Reports can be generated in ATTAINS
<ul style="list-style-type: none"> <li><i>A list of water quality-limited waters (impaired and threatened) still requiring a TMDL, pollutants causing the impairment, priority ranking for TMDL development (including waters targeted for TMDL development within the next two years) (40 CFR 130.7(b))</i></li> </ul>	Captured in ATTAINS including the priority ranking for TMDL development; additional priority ranking narrative may be uploaded to ATTAINS
<ul style="list-style-type: none"> <li><i>Status of TMDL development</i></li> </ul>	Captured in ATTAINS; additional narrative can be uploaded to ATTAINS
<ul style="list-style-type: none"> <li><i>Summaries of designated use support</i></li> </ul>	Summary reports can be generated in ATTAINS
<ul style="list-style-type: none"> <li><i>Any other reasonable information requested by the EPA Regional Administrator (40 CFR 130.7(b)(6)(iv))</i></li> </ul>	May be captured in “rationale” field or additional narrative uploaded
<ul style="list-style-type: none"> <li><i>An assessment of the water quality of all publicly owned lakes, including the status and trends of such water quality as specified in section 314(a)(1) of the Clean Water Act (40 CFR 130.8(b)(5))</i></li> </ul>	Captured in ATTAINS including TMDLs, TMDL Alternatives/4bs and protection approaches; reports can be generated in ATTAINS; additional narrative can be uploaded
<b>C.4 Wetland Program</b>	Narrative; upload to ATTAINS
<b>C.5 Trend Analysis of Surface Waters Including Publicly Owned Lakes</b>	Reports can be generated in ATTAINS; additional narrative to assess trend analysis can be uploaded
<b>C.6 Public Health Issues</b>	Summary reports can be generated in ATTAINS; additional narrative can be uploaded
<b>Part D. Ground Water Monitoring and Assessment</b>	
<ul style="list-style-type: none"> <li><i>Description of the nature and extent of ground-water pollution and recommendations of State plans or programs needed to maintain or improve ground-water quality (40 CFR 130.8(c))</i></li> </ul>	Narrative; upload to ATTAINS
<b>Part E. Public Participation</b>	
<ul style="list-style-type: none"> <li><i>Description of required public participation process (e.g., 40 CFR 130.7(a))</i></li> </ul>	Narrative; upload documentation to ATTAINS
<ul style="list-style-type: none"> <li><i>Comments received and responsiveness summary</i></li> </ul>	Narrative; upload to ATTAINS