



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

DEC 13 1985

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Loss of Authorization by Rule in Direct Implementation States - Compliance Status Follow-up

FROM: Michael B. Cook, Director *Michael Cook*
Office of Drinking Water (WH-550)

TO: Water Division Directors
Regions I-X

On October 24, 1985, Victor Kimm and Glenn Unterberger sent you a guidance memorandum which described the Agency's approach for handling cases involving loss of authorization by rule for owners and operators who failed to submit inventory information pursuant to 40 CFR §144.26. Under this guidance, violation letters were to be sent to owners and operators who did not receive notice of the June 25, 1985, deadline for submitting inventory information and who failed to submit the required information, informing them of their obligation and the need for a permit if they desired to continue to operate. These letters were to have been mailed on or about November 8, 1985.

According to information received at Headquarters, the Regions responded to this request by mailing 338 violation letters for failure to submit inventory information, 15 letters for incomplete or inadequate information, and 125 letters to non-filers who may need to submit inventory information. This was an excellent effort and I appreciate your prompt response.

We need your continued assistance in following-up on these violation letters. The October 24, 1985, memorandum requested the submission of a compliance status report from each of you by December 20, 1985. Once we have received this information we will be contacting you to identify potential enforcement candidates for our UIC Enforcement Initiative.

Again, I appreciate your strong support in helping to get the UIC compliance and enforcement program off to a running start and look forward to working with you to establish a strong enforcement presence for this new and important Agency program. My staff contact on this project is Don Olson, who can be reached at FTS 382-5558. If I or Don can be of any assistance to you, please call us.

cc: Glenn Unterberger, OECM-Water