

Applying for a Water Pollution Control Revolving Loan Fund: Toolkit for Local Leaders

Created by law students in the Mississippi Delta Project, a Student Practice Organization of Harvard Law School, in partnership with the Mississippi Center for Justice.

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Introduction

Who is this toolkit for?

If you represent or are employed by a Mississippi county, municipality, public utility, authority, district, political subdivision, or other governmental unit created under state law, and you are seeking to control water pollution in your community, through projects such as wastewater treatment plant upgrades and repairs, sewer rehabilitations and replacements, new effluent pump stations, or new sewer collection areas then you may be interested in applying for funding through the Mississippi Department of Environmental Quality's ("MDEQ") Water Pollution Control Revolving Loan Fund ("WPCRLF").

Importantly, if your community is classified as small and low-income (population less than 4,000 people, median per capita income \$40,000 or less) then you could qualify for "principal forgiveness" under the Revolving Loan Fund. This means that 75% of a loan taken out through the program would be forgiven, with the maximum amount of forgiveness being \$2 million.

What is in this toolkit?

The following information is intended to provide an overview and general guidance to entities and individuals interested in learning more about the process for applying for WPCRLF funding for their community. The information is based on publicly available documents published by MDEQ and follow-up conversations conducted by the authors with MDEQ over the 2020-2022 academic years. While the authors of this guide strove to be thorough and accurate, details concerning particular situations may be summarized or omitted to manage the document's length. Applicants should contact MDEQ concerning their specific circumstances.

This toolkit is organized into four main sections: a description of **what the WPCRLF is** and **what it does**, a description of the **application process**, a brief description of a **typical application timeline**, and several additional resources and appendices.

The information provided in this document does not, and is not intended to, constitute legal advice; instead, all information and content are for general informational purposes only, and may not constitute the most up-to-date information.

Overview of the WPCRLF

What is the Water Pollution Control Revolving Loan Fund?

The WPCRLF is a loan program aimed at helping communities and public utilities improve infrastructure related to water pollution. The loan program is funded by both the Environmental Protection Agency and state match funding. The program is administered by state agencies. In Mississippi, MDEQ administers the loan program.

Who can apply for a loan?

Any Mississippi county, municipality, public utility, authority, district, political subdivision or other government units created under state law. Unincorporated communities can qualify for funding through their county or through their utility district.

What is a brief overview of the application process?

All of the following components are needed in order for an applicant to be placed on the Priority List and receive a WPCRLF loan. The [Application Process Details](#) are described in greater detail below (page 9). If you have questions about the application process, please contact someone at MDEQ (see [Bibliography & Additional Resources](#), page 18) — they are there to help you navigate this process!

I. Pre-Planning

1. Familiarize yourself with the loan and MDEQ
2. Research additional funding
3. Arrange a pre-planning conference
4. Hire a consulting engineer

II. Create a Facilities Plan

1. Submit a Ranking Form
2. Develop a Facilities Plan
3. Submit the Facilities Plan to proper agencies
4. Hold a public hearing
5. Submit the Facilities Plan to MDEQ

III. Submit a Loan Application

1. Complete and compile all document requirements
2. Submit completed application

What kinds of projects does the WPCRLF support?

Broadly stated, WPCRLF supports water control projects involving wastewater, stormwater, or non-point sources. Specific types of projects funded in the past include (among others):

- New Collection–Existing Buildings (e.g., sewer collection)
- Wastewater Overflow/Bypass Elimination Projects (e.g., sanitary sewer improvements and rehabilitation)
- Existing Facilities Upgrade (e.g., replacing and rehabilitating pump stations; sewer system improvements; wastewater treatment facility upgrades; plans to clean, replace or upgrade facilities, sewer rehabilitation)
- New Facilities (Developmental) Projects (e.g., pump station and improvement projects, pipeline upgrades, interceptors, pump stations, force mains)

What is the cap on loan funding?

There is no cap on the loan award an eligible applicant can receive. WPCRLF loans will cover 100% of allowable costs, and there is no match requirement.

How do municipalities pay back loans?

Loans are often paid back through taxes, bond issues, or other municipal project financing mechanisms. Because these funding mechanisms can be difficult, especially for small municipalities, applicants should first explore opportunities to pursue grant funding before taking on new loans. Applicants should carefully consider their options for paying back loans before going through the WPCRLF process.

Is forgiveness available for loans?

Yes. For certain communities, forgiveness of 75% of the loan principal is forgivable, up to \$2 million. Municipalities on the Small/Low-Income priority list are eligible for forgiveness. To be eligible, a project must:

- Serve a project area of 4,000 or less;
- Serve a project area with a median income of \$40,000 or less;
- Be in WPCRLF priority categories 3 through 8.¹

¹ Eligible Categories are: Raw Discharge Correction Projects; Existing Facilities Upgrade (Not Meeting Final Limits) Projects; Non-Point Source and Storm Water Pollution Correction Projects; New Collection – Existing Buildings Projects; Wastewater Overflow/Bypass Elimination Projects; Existing Facilities Upgrade (Meeting Final Limits) Projects. Projects that are not eligible are New Facilities Projects, Industrial Projects.

Can a municipality use grants in conjunction with SRF loans?

Yes. MDEQ works with other funding sources to allocate loans for projects. Grants can cover part of the overall cost of a project, thus reducing the amount of loans needed to cover the remaining cost of the project. Some common sources are:

- [Community Development Development Block Grant Program \(CDBG\)](#)
- [Appalachian Regional Commission \(ARC\) Grant Program on Jointly Funded Wastewater Projects](#) (to begin applying, contact region manager [Mike Armour](#))
- [Rural Utilities Service \(RUS\) Grant and Loan Program on Jointly Funded Wastewater Projects](#)

Note that MDEQ will not award a WPCRLF loan to a jointly funded project until the other funding source(s) have provided their award or provided assurance that the award will be made within a compatible timeframe for the project. Grants can be used to cover part of the overall cost, but they cannot be used to pay off the loans. In order to ensure timely receipt of your WPCRLF loan, you should work on securing grant funding before or as you are completing your WPCRLF application process. Of course, if outside sources end up covering the full cost of your project, you can withdraw your WPCRLF application, as municipalities often do when met with that situation.

Every year, typically in February, MDEQ publishes a “coordination schedule” that gives specific deadlines by which applicants need to secure their third-party funding and submit that documentation to MDEQ. Some flexibility may be granted if you reach out to MDEQ directly about the circumstances surrounding your application.

Is Asset Management Required?

A Fiscal Sustainability Plan is a required component of a loan application. The Fiscal Sustainability Plan Certification is available as Attachment 1 to MDEQ’s [Guidance for Water Pollution Control Revolving Loan Fund Projects Funded Beginning Federal FY 2016](#).

Municipalities should consult with MDEQ as to the specifics of what will be required for their individual Fiscal Sustainability plan.

Does MDEQ take into account past financial history such as loan history, bankruptcy, or bond issues?

This information will likely be required as part of the Fiscal Sustainability Plan, which is required as part of loan applications. Applicants should consult with MDEQ as to the specifics of what credit history will be included in their plan.

If an applicant is delinquent on a previous Revolving Fund loan, the applicant will not be eligible for a new Revolving Fund loan until they get caught up on the delinquent loan. Applicants should consult with MDEQ on how other delinquent loans could affect their eligibility. If an applicant has existing debt with Rural Utilities Service, they should also submit a copy of their Facilities Plan to Rural Utilities Service and request its approval to incur this additional debt.

Can WPCRLF loans fund existing debt?

Debts incurred prior to loan award can be funded by a WPCRLF loan provided all of the following conditions are met:

- The debt is for planning, design, or construction relating to a construction contract within the year before the loan is awarded;
- The project complies with all WPCRLF regulations and receives MDEQ approval;
- The prospective loan recipient agrees that it proceeds at its own risk until loan funding is awarded;
- The prospective loan recipient agrees that it is not receiving a commitment from MDEQ to receive loan funding by incurring pre-award costs.

Will my loan be awarded?

Through the WPCRLF program, MDEQ has historically funded all projects with a complete application. Past decisions to *not* fund projects have generally been because an application was late or incomplete (e.g., missing an item from the checklist below). Such applications are placed at the top of the list for funding for the next year so long as any deficiencies have been addressed. Therefore, to receive funding for your water pollution control project as soon as possible, it is very important to make sure that project applications are complete and submitted before the deadline. This toolkit serves to help you do just that.

What are these different “plans” and “lists”? (Key Terms)

Facilities Plan	Completed by the loan applicant, the Facilities Plan provides comprehensive details regarding the project for which funding is sought and is submitted to MDEQ.
Priority List	A list, compiled by MDEQ, of applicants that have completed all loan application requirements (and obtained all necessary approvals) and are ready to proceed, ranked by category and then, within each category, by additional multi-factor criteria.
Planning List	A list, compiled by MDEQ, of applicants that have begun the application process but are not on track to complete all requirements by that year’s deadline.
Intended Use Plan	Published by MDEQ, the Intended Use Plan outlines how Mississippi will use federal funds in a given year to support water pollution control through the revolving fund.

Application Process Details

Summary of Application Process:

The Revolving Loan application process can be broken down into three phases: (A) familiarizing yourself with the application process and securing outside funding, (B) hiring and working with your consulting engineer to develop a Facilities Plan, and (C) submitting the plan and other application documents (these application documents are generally much simpler to complete than the Facilities Plan). You will compile your loan application information the year before you expect to receive funding. If you want to fund a project for 2024, you will submit your first documentation in October 2023. For a more complete sense of the application timeline, see [Application Timeline](#) below.

STEP 1: Pre-Planning

A. **Familiarize yourself** with the loan and MDEQ.

1. Review MDEQ's online resources: [Website for MDEQ, Water Pollution Control Revolving Loan Fund](#)

B. Consider securing **other sources of funding**, some of which may help you fund up-front WPCRLF application costs (such as professional services). For a full list of allowable costs, review [Appendix A](#). Note that even if you do not secure third-party funding to pay for up-front application costs, these costs will ultimately be reimbursed by the loan. For example, you will need to pay for an engineer to work on your Facilities Plan with you, but the cost of paying that engineer is factored into the final loan payment.

1. [Community Development Block Grant Program \(CDBG\)](#)
2. [Appalachian Regional Commission \(ARC\) Grant Program on Jointly Funded Wastewater Projects](#) (to begin applying, contact region manager [Mike Armour](#))
3. [Rural Utilities Service \(RUS\) Grant and Loan Program on Jointly Funded Wastewater Projects](#)
4. [Delta Regional Authority Economic Development Assistance Program](#)

C. Consider arranging a **pre-planning conference** with the MDEQ Department staff. Contact information is provided in [Bibliography & Additional Resources](#), page 18.

- D. **Hire a consulting engineer** registered in Mississippi. You will work with the consulting engineer to compile the Facilities Plan. This is the most time-intensive part of the application process as it requires a specific procurement process (see below). While securing an engineer is a project expense, many engineers do not expect to be paid until the loan funding is secured, though you should set payment schedule expectations with the engineer you hire.

Contracts for engineering services need to comply with federal procurement processes according to 40 U.S.C. § 1101. Under 40 U.S.C. § 1101 the procurement process requires the following:

- a. A public announcement for the solicitation of the engineering contract (a Request for Qualifications)
- b. An evaluation and ranking of the submitted qualifications statements based on established, publicly available criteria. This criteria should be related to the competence and qualifications of the engineering services required.
- c. Discussions with a minimum of three firms concerning project concepts and service method alternatives
- d. Selection of a minimum of three most highly qualified firms
- e. Contract negotiation with the most highly qualified firm to determine fair and reasonable compensation based on the project scope and the estimated value of services. If a contract cannot be negotiated with the most qualified firm, negotiation continues in order of qualification.

See **Bibliography & Additional Resources**, page 18, for contact information for the American Council of Engineering Companies of Mississippi.

STEP 2: Submit Facilities Plan Documentation:

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- A. **Submit a Ranking Form** requesting placement on the Priority List.

1. The Ranking Form is used to prioritize different projects for funding. Submitting this form, along with the other required documents, will determine the amount of your loan and its relative priority compared to other projects.

2. The Ranking Form can be submitted prior to the facilities plan, but the Facilities Plan and all other required documents must be sent by the deadline for the project to be considered for finding prioritization.
3. For the [Ranking Form](#) you will need the following information:
 - i. Basic information about you, your organization, your consulting engineer, and your legal counsel, if known;
 - ii. Brief description of each project for which you are seeking funding;
 - iii. Information on any existing, unsewered buildings that are intended to be served, if any;
 - iv. Name and NPDES permit number of any existing treatment facility discharges that will be eliminated, if any;
 - v. Estimated waste water flow;
 - vi. Estimated cost breakdown of the project and any other potential funding sources;
 - vii. Estimated timeline of completion.

B. Develop Facilities Plan with your consulting engineer.

1. The Facilities Plan will provide details on your community's need for the project, explain the existing state of the planning area, run through any further legal requirements that may pertain to your particular project, include a financial analysis of the project, etc. A full Facilities Plan checklist is available [here](#). More guidance and required documents can be found here: [Guidance for Water Pollution Control Revolving Loan Fund Projects Funded Beginning Federal FY 2016](#). Note that there may be more up to date checklists on [MDEQ's website](#).
2. Collect technical documents. You will work very closely with your consulting engineer to compile these documents.
 - i. Planning area map, including information as laid out in section III of the Facilities Plan;
 - ii. Waste flow laid projections as detailed in section IV of the Facilities Plan;

- iii. Cost effectiveness analysis as applicable in section V of the Facilities Plan;
- iv. For treatment project, a site plan including the layout of existing and proposed facilities and either (1) a buffer zone (minimum 150 feet from the water's edge) or (2) documentation that the adjacent property is zoned or used for commercial or industrial use, or (3) a schedule to acquire waivers from adjacent landowners and to request a Permit Board variance from the buffer zone requirement;
- v. Any further permit applications or surveys that may be required (e.g., U.S. Army Corps of Engineers, Mississippi Natural Heritage Program);
- vi. Financial analysis of the project as detailed in section VII and attachment 2 of the facilities plan;
- vii. Soil and groundwater review as detailed in attachment 1 of the Facilities Plan.

C. **Submit the Facilities Plan** to the Intergovernmental Review (IGR) agencies. You will work with your engineer to ensure that your Plan has all the information these agencies need to comment on your project. The IGR agencies are:

- 1. **Mississippi Department of Archives and History**: will review whether an archaeological/cultural resources survey is required.
- 2. **Mississippi Department of Wildlife Fisheries & Parks (Natural Heritage Program)**: will review whether a vegetative/wildlife survey is required.
- 3. **U.S. Army Corps of Engineers**: will review whether Section 10 or Section 404 permits are required.
- 4. **Mississippi Department of Marine Resources**: will check whether any state permits within their jurisdiction are required.
- 5. **U.S. Forest Service (only for projects in the Wild/Scenic River Basin)**: will review compliance with the Wild/Scenic River Act.
- 6. **U.S. Fish and Wildlife Services (USFWS)**: will review that your project complies with the Endangered Species Act, the Fish and Wildlife Coordination Act, the Migratory Bird Treaty Act, and the Coastal Barrier Resources Act (if your project is located in a coastal county).

7. **U.S. Environmental Protection Agency Region 4 Grants and Drinking Water Protection Branch:** will review information related to the regional aquifer.

- i. Only applicable for projects in the Southern Hills Regional Aquifer System, which is the area between the Mississippi and Pearl Rivers, including Warren and Hinds Counties south to the Louisiana State Line.

- D. **Hold a public hearing.** Public participation is a requirement under section VIII of the Facilities Plan and you will need to provide proof of such a public notice or hearing.

1. Publish Notice. After receiving IGR comments, publish at least one notice of public hearing in a newspaper of general circulation in the project area with at least 30 days' notice. The notice and hearing must give the public an opportunity to comment on the proposed project and to examine all environmental review documents.
 2. Hold the public hearing.
 3. Submit information on the public comment period or hearing, including a copy of the public notice for the proposed project, copies of any comments received from the public, and a summary of how each comment was addressed to MDEQ.

- E. **Submit complete Facilities Plan** to MDEQ. The submission deadline is usually in October the year before you expect to receive funding. However, even if you do not submit your Facilities Plan by this deadline, MDEQ will place your project on a planning list. The projects on the planning list may still receive funding for the upcoming year. If they do not receive funding, then they are placed at the top of the Priority List for the next year.

1. Facilities Plan must include comments from the IGR agencies.
 2. Facilities Plan must include Cost and Effectiveness Certification document, available as Attachment 7 to MDEQ's [Guidance for Water Pollution Control Revolving Loan Fund Projects Funded Beginning Federal FY 2016](#).
 3. If the applicant has existing debt with the Rural Utilities Service (formerly Farmers Home Administration), a copy of the Facilities Plan should be submitted to the Rural Utilities Service, along with a request for their approval to incur this additional debt.

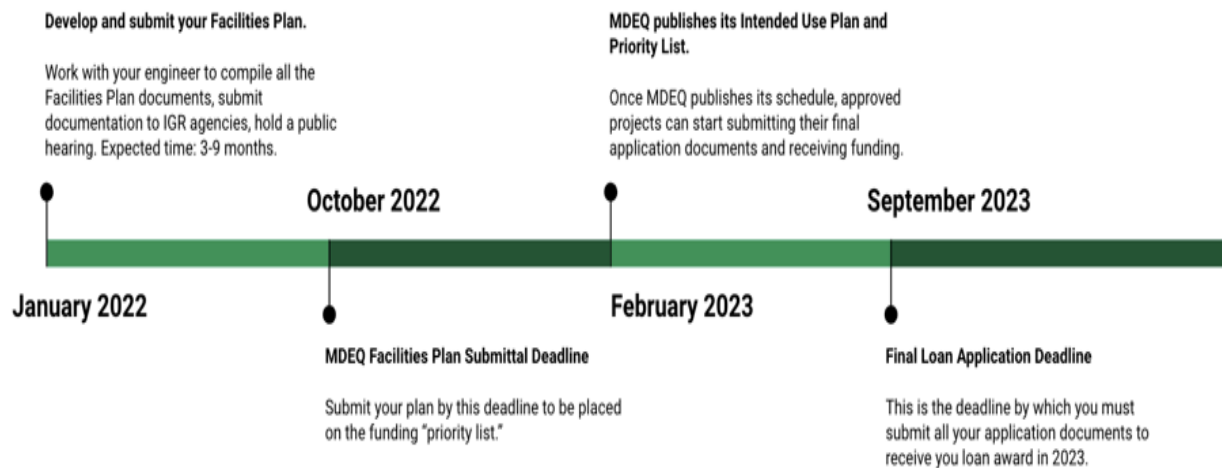
STEP 3: Submit Loan Application

- A. **Complete other Application Forms:** After submitting the Facilities Plan to MDEQ, you can start filling out and submitting the rest of the necessary application documents. These are largely standard forms and should not take a substantial amount of time to complete. These documents include:
1. **Fiscal Sustainability Plan Certification** - This document requires that an authorized representative and the consulting engineer certify that the loan applicant will either complete a fiscal sustainability plan before the construction is 90% complete or has already completed such a plan. To qualify, the fiscal sustainability plan must include an inventory of critical assets that are a part of the treatment works; an evaluation of the condition and performance of inventoried assets or asset groupings; a certification that the recipient has evaluated and will be implementing water and energy conservation efforts as part of the plan; and a plan for maintaining, repairing, and, as necessary, replacing the treatment works and a plan for funding such activities. The **Fiscal Sustainability Plan Certification** is available as Attachment 1 to MDEQ's [Guidance for Water Pollution Control Revolving Loan Fund Projects Funded Beginning Federal FY 2016](#).
 2. **Certification Letter from USFWS** - The loan recipient must submit a map and description of the proposed project to the U.S. Fish & Wildlife Service (USFWS), Mississippi Ecological Services Field Office. The comments received in return from USFWS, with regards to the Endangered Species Act, Fish and Wildlife Coordination Act, Migratory Bird Treaty Act, and (only for projects located in Jackson, Harrison, and Hancock Counties) Coastal Barrier Resources Act, must be included in the application. If the USFWS mandates any mitigation actions, the loan recipient must take those actions as soon as possible and resubmit the relevant information to USFWS.
 3. **Generally Accepted Accounting Principles Certification** - This document requires signatures from an authorized representative and the City Clerk, Town Clerk, or Chief Financial Officer certifying that the loan recipient will maintain project accounts in compliance with generally accepted accounting principles, including standards related to the reporting of infrastructure assets. The **Generally Accepted Accounting Principles Certification** is available as

Attachment 2 to MDEQ's [Guidance for Water Pollution Control Revolving Loan Fund Projects Funded Beginning Federal FY 2016](#).

4. **Federal/State Procurement Certification** - This document must be signed by an authorized representative and legal counsel of the loan recipient confirming that they have complied with all of the applicable requirements of 40 U.S.C. § 1101 for the procurement of program management, construction management, feasibility studies, preliminary engineering, design engineering, surveying, mapping, or A/E services as defined in 40 U.S.C. § 1102(2)(A-C). The document also certifies that the loan recipient has complied with all of the requirements of state public purchasing law. The **Federal/State Procurement Certification** is available as Attachment 8 to MDEQ's [Guidance for Water Pollution Control Revolving Loan Fund Projects Funded Beginning Federal FY 2016](#).
- B. **Submit completed loan application** to MDEQ.
- C. **Receive Funding!**
1. Most applicants receive their funding on a monthly basis, but some will elect to receive it on a quarterly basis.

Application Timeline



Sample Timeline

Every year, MDEQ sets a deadline by which projects must submit their Facilities Plan. MDEQ ranks the projects that submit their Facilities Plan by the deadline in order of funding priority. The Facilities Plan submittal deadline is usually in **October or late November**. Note that even if your project is at the bottom of the priority list, you are **likely to receive funding for that fiscal year**. If you do not receive funding for that year, your project will be toward the top of the Priority List for the next year. Projects that submit their Facilities Plan after the MDEQ deadline will be placed on the **Planning List**. These projects **may still receive funding for the upcoming fiscal year**, depending on whether there are enough leftover funds. If these projects do not receive funding, they are placed back on the Priority List for the next year.

Most of the work you need to do for your project comes **before the Facilities Plan deadline**. You will work with your engineer to compile all the necessary documents. Note that for the public hearing requirement, there is a minimum **30-day notice** before you can hold the hearing. Note that after submitting your plan to the inter-governmental agencies, you can expect the agencies to take **2-3 months** to respond with comments on your plan.

After you put together your Facilities Plan, you will submit it to MDEQ to review. You will then work with MDEQ to address any issues they identify with your plan. This back and forth with MDEQ takes **between a week and a month**. You will then officially submit the plan to MDEQ. The total time it takes to develop and officially submit the Facilities Plan is

between three months (for simpler projects) and nine months (for complex projects).

After the Facilities Plan submittal deadline in October or November, MDEQ will then release its **Intended Use Plan**, which includes the Priority List. This plan is usually released in **February**, but note that COVID-19 delayed MDEQ's release until May 2021. MDEQ reserves funding for projects on the priority list. This is also when MDEQ releases its Coordination Schedule, which sets the deadlines by which projects receiving third-party funding have to submit information to MDEQ.

If MDEQ reserves funding for your project, you have **until September 30** to finish your loan application and submit the final application to MDEQ. Once the loan is awarded, it will take **around a week** to get the loan award processed through MDEQ's office and to the applicant.

Bibliography & Additional Resources

MISS. DEP'T OF ENVTL. QUALITY, [GUIDANCE FOR WATER POLLUTION CONTROL REVOLVING LOAN FUND PROJECTS FUNDED BEGINNING FEDERAL FY 2016](#) (2015).

MISS. DEP'T OF ENVTL. QUALITY, FY 2021 FUNDING NOTIFICATION MEMO (2020) (FY 2022 Funding Notification Memo now available at <https://www.mdeq.ms.gov/wp-content/uploads/2020/08/FY2022-Funding-Notification-Memo.pdf>).

MISS. DEP'T OF ENVTL. QUALITY, WATER POLLUTION CONTROL REVOLVING LOAN FUND (WPCRLF) PROGRAM: FY-19 INTENDED USE PLAN (2019) (Final FY 2021 Intended Use Plan (IUP) available at <https://www.mdeq.ms.gov/wp-content/uploads/2020/07/Final-FY21-IUP.pdf>).

Additional resources available at MDEQ webpage, *Water Pollution Control (Clean Water) Revolving Loan Fund (WPCRLF) Program*, <https://www.mdeq.ms.gov/about-mdeq/grants-loans-and-trust-funds-available-through-mdeq/water-pollution-control-clean-water-revolving-loan-fund-wpcrlf-program/>.

For any further questions you may have, please contact:

Mississippi Department of Environmental Quality ("MDEQ")

Main Phone Line: (601) 961-5171

Website: <https://www.mdeq.ms.gov/about-mdeq/grants-loans-and-trust-funds-available-through-mdeq/water-pollution-control-clean-water-revolving-loan-fund-wpcrlf-program/>

Ask about the "**Clean Water Revolving Loan Fund**" or ask for the **Construction Branch Chief**.

For consulting engineers:

American Council of Engineering Companies of Mississippi

Website: <http://www.acecms.org/>

Phone: (601) 420-2002

Executive Director, Craig Carter

Email: craig@acecms.org

Appendix 1: Checklist of Documents

- **Ranking Form**
- **Facilities Plan** including:
 - Comments from USFWS
 - Cost and Effectiveness Certification Document
 - IGR Agency Comments
 - Copy of Public Notice for Proposed Project
 - Copies of any comments received from the public
 - Summary of how each comment was addressed
 - (if within Southern Hills Regional Aquifer System) Comments from EPA
- **Loan Application** including:
 - Fiscal Sustainability Plan
 - Certification letter from USFWS with regards to Fish and Wildlife Coordination Act, Migratory Bird Treaty Act, and—for projects located in Jackson, Harrison, and Hancock Counties—the Coastal Barrier Resources Act
 - Generally Accepted Accounting Principles document
 - Proposed user charge system and ordinance
 - All construction phase engineering services contracts (proposed and executed)
 - All other contracts (proposed or executed, such as administrative, legal, design, etc.)
 - Copies of IGR Agency comments, permits, or clearance letters
 - Governing Body Resolution (authorizing application and designating an individual or office as authorized representative)
 - Interlocal agreements (proposed or existing)
 - Department Forms
 - Federal/State Procurement Certification document showing compliance with 40 U.S.C. § 1101
 - Allowable Cost Certification (NPELF76)
 - Legal Certification (NPELF69)
 - Executed Pre-award Compliance Review Report (EPA Form 4700-4, should be sent to MDEQ)
 - Waste Disposal Permit Applications
 - If applicable:
 - Financial Capability Summary (if loan requested is significantly greater than the facilities plan)
 - Assurances from other funding sources