



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Apr -6 2007

Certified Mail No. P 432 844 908
Docket No. CWA-405-9-07-01

David Craddick
General Manager
Guam Waterworks Authority
578 N. Marine Corps Dr.
Tamuning, GU 96913-4111

Re: Finding of Violation and Order for Compliance under sections 308
and 309(a) of the Clean Water Act, EPA Docket No. CWA-405-9-07-01

Dear Mr. Craddick:

Based on a review of the Guam Waterworks Authority's (GWA's) 2006 annual biosolids report, EPA has determined that GWA improperly land applied 1,046 dry metric tons of biosolids to several farms in Guam. Land application of biosolids must meet the requirements in EPA's Standards for the Use or Disposal of Sewage Sludge (40 CFR 503). EPA identified a number of violations of 40 CFR 503, including GWA's failure to demonstrate pathogen reduction, failure to monitor pollutants in the biosolids, failure to ensure that the nitrogen loading rates were not exceeded, and failure to ensure that crop harvesting restrictions were met.

EPA issues the enclosed Findings of Violation and Order for Compliance pursuant to sections 308 and 309(a) of the Clean Water Act. The Order requires GWA to refrain from further land application of its sewage sludge until GWA monitors its biosolids and demonstrates that the biosolids meets EPA's standards. This Order also requires GWA to report information about its biosolids land application and disposal practices so we can assess the threat to public health or the environment created by these disposal practices. Finally, GWA is required to notify owners of the sites that received sewage sludge of site and harvesting restrictions.

If you have any questions regarding the enclosed Finding of Violation and Order, please contact Michael Lee of the Pacific Islands Office at (415) 972-3769 or Lauren Fondahl of the Clean Water Act Compliance Office at (415) 972-3514.

Sincerely,

**<Original signed by
Nancy Woo for>**

Alexis Strauss
Director
Water Division

Enclosure: Finding of Violation and Order

cc: Lorilee Crisostomo, Guam EPA