



**End of Year Report for 2005 and Update for Federal Fiscal Year 2006 to the  
PERFORMANCE PARTNERSHIP AGREEMENT**

**between the**

**VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

**and the**

**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 1**

**for**

**FEDERAL FISCAL YEARS 2004, 2005 AND 2006**

**January, 2006**

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## **Part I - Statement of purpose**

The Vermont Department of Environmental Conservation and the Environmental Protection Agency (EPA) currently have an approved Performance Partnership Agreements (PPA) for fiscal years 2004, 2005 and 2006. This report is the End of Year Report for year 2005, and an update for year 2006 of the PPA.

The end of year report and updates are provided in each division program Performance Based Budgets (PBBs) accompanying this report. The PBB documents summarize the intended results of each division program, the annual performance measures and proposed accomplishments. Annual performance measures include both proposed and actual values for a given measure. In addition to the PBBs, individual responses to questions raised by EPA are provided in Part VII of this report and an update on the status of Quality Assurance Project Plans is provided in Appendix A.

This year, federal fiscal year 2006, EPA has generated a two documents outlining their priorities for Vermont; “Vermont PPA Priorities & Commitments List – June 27, 2005” and “Permit Integrity Profile Action Items for Vermont”. The Vermont Department of Environmental Conservation negotiated an agreement on these items and transmitted them in a letter dated September 27, 2005. In the interest in keeping all workplan related documents in one place; these documents are included in Appendix B.

## **Part II - Programs Covered by the Agreement**

This agreement covers these federal programs:

1. Water Pollution Control (CWA Section 106, surface and ground water)
2. Nonpoint Source Management (CWA Section 319)
3. Water Quality Cooperative Agreements (CWA Section 104(b)(3))
4. Wetlands Program Development (CWA Section 104(b)(3))
5. Public Water System Supervision (SDWA Sections 1443(a) and 1451(a)(3))
6. Underground Water Source Protection (UIC) (SDWA Section 1443(b))
7. Resource Conservation and Recovery Grant (RCRA) (SWDA Section 3011(a))
8. Underground Storage Tank Grant (UST) (SWDA Section 9010)
9. Pollution Prevention Incentive Grant (PPIS) (PP Act Section 6605)
10. Clean Air Act Grant (CAA Section 105)

### **Part III - Reporting**

The PPA/PPG process is designed to reduce the level of EPA oversight and state reporting through the use of mutually agreeable priorities and environmental indicators. DEC already submits a significant amount of information to EPA under national and regional reporting requirements. In addition to those data, the department agrees to submit a mid-year report, consisting of a brief narrative discussing those activities where satisfactory progress has not been made toward meeting defined indicators or proposed accomplishments.

An end-of-year report and update for the coming year is submitted, following the end of the federal fiscal year. This report will be similar to the end-of-year reports submitted under previous PPAs, will summarize progress in special attention areas and discuss areas where we failed to meet established indicators or are experiencing difficulties in making anticipated progress. Updates to performance measures and proposed accomplishments also will be included as appropriate.

At least monthly, contact will be made between the EPA's Vermont state program unit manager and the DEC's representatives to discuss any areas that have been raised by their respective staff member that could affect the agreement. Staff-level workgroups will be formed, as needed, to cover areas of EPA assistance to the state on defined issues. Normal reporting of data required to support national databases, such as PCS and SDWIS, will continue under this agreement, as will normally required program reporting, such as 305(b) and enforcement-related actions. Vermont's list of high-priority, targeted, impaired waters will be submitted as required by Section 303(d).

#### **Schedule of Reporting Dates and Milestones**

<b>Date</b>	<b>Milestones</b>
May 2006	Submit mid-year report for 2006 consisting of a brief narrative discussing activities where satisfactory progress has not been made toward meeting defined indicators or proposed accomplishments.
May 2007	Begin discussion with EPA and stakeholders for the 2007 to 2009 PPA.
Sept 2007	Submit 2007 PPG and 2007 to 2009 PPA.
December 2006	Submit end-of-year PPG report for 2006.

## **Part IV - Reopening Agreement and Resource Shortfalls**

Although the parties have agreed to a three-year agreement, either EPA or the DEC can request to reopen discussions about this agreement. In general, reopening the agreement should be limited to a major omission or a new or unanticipated requirement or change in FFY 2006. EPA's Enforcement Office only negotiates its activities annually. Therefore, the compliance-related sections of this agreement cover FFY 2006 only. DEC expects that the programs may need to make mid-course adjustments as appropriate. If the adjustments are minor and are mutually agreeable, we do not anticipate amending the PPA, we will handle this through written correspondence between EPA and DEC. If the adjustments are significant, then the parties will reopen the agreement.

## **Part V - Dispute Resolution**

The department and EPA agree that the following process will be used to resolve any disputes that cannot be settled by consensus agreement, although both parties agree that every effort will be made to resolve all issues in a timely fashion without resorting to this process.

1. The dispute shall be defined in writing by both parties, with the issues and obstacles clearly stated by both parties.
2. Written disputes shall be submitted to the Vermont state program unit manager and the department's commissioner.
3. The Vermont state program unit manager and DEC commissioner shall discuss the dispute and reach a decision within two weeks of the submission.
4. If agreement cannot be reached at this level, the dispute shall be raised to a higher level in each organization following the same process.

## Part VI - Performance-based Budgets

Performance-based budgets (PBBs) attached to this report contain a summary of the work planned for the next three years. These documents and department program outcomes comprise the agreements for the 2004 to 2006 work plan. The budget for the PBBs is the Performance Partnership Grant. PBBs funded in part by this grant are noted with an asterisk (\*) below and included in this submittal.

Department Program	Division Program	Letter
Air	<a href="#">Air Pollution Control</a>	A*
Surface Water	ANR Engineering Services	B
	Aquatic Nuisance Management	C
	Dam Safety Program	D
	<a href="#">Direct and Indirect Discharge Management</a>	E*
	<a href="#">Flow Management</a>	F*
	Residuals Management	G
	<a href="#">Riparian Corridor Management</a>	H*
	<a href="#">Stormwater Management</a>	I*
	<a href="#">Surface Water Monitoring and Assessment</a>	J*
	Water Pollution Control Projects Implementation	K
	<a href="#">Watershed Planning and Projects</a>	L*
	<a href="#">Wetlands Management</a>	M*
Drinking Water	Drinking Water System Project Implementation	N
	<a href="#">Public Drinking Water Engineering and Financial Services</a>	O*
	<a href="#">Public Drinking Water Operations and Compliance</a>	P*
	<a href="#">Public Drinking Water Support and Planning</a>	Q*
Groundwater and Earth Resources	<a href="#">Drinking Water Resource Management</a>	R*
	<a href="#">Wastewater and Water; and UIC Permits</a>	S*
	Vermont Geological Survey	T
Waste	Contaminated Sites Management	U
	<a href="#">Pollution Prevention</a>	V*
	<a href="#">Hazardous Waste Management</a>	W*
	Solid Waste Reduction and Management	X
	<a href="#">Underground Storage Tanks</a>	Y*
	Hazardous Material Spills Response	Z
Management and Support Services	Department Operational Services	AA
	Laboratory Services	BB
	Permit and Compliance Assistance	CC
	<a href="#">Enforcement</a>	DD*

**APPENDIX A**  
**LIST OF ACTIVE QUALITY ASSURANCE PROJECT PLANS**

**Updated November 22, 2005**

## Water Quality Division

Program	Project #	Project Manager	Yr QAPP written / last updated	EPA Approval in Place?	Scheduled Update?
<b>Core Programs</b>					
Spring Phosphorus Program	1	Kamman	1996	Yes	2004
Lake Assessment Program	2	Kamman	2005	Yes	2010
Water Level Monitoring Program	3	Hanna	None		
The Lake Champlain Long-Term Monitoring Program	4	Smeltzer	2005	Yes	2006
The Long-Term Monitoring (LTM) Acid Lakes Program	5	Kellogg	2005	yes	
The Stream Geomorphic Assessment Program	6	Kline	2003	yes	??
The Fish Contaminant Monitoring Program	7	Langdon	2002	Yes	??
<b>Diagnostic Studies</b>					
Individual lake diagnostic studies	8	Kamman	Small lake studies are now covered under the 2003 Lake Assessment QAPP (project 2).		
REMAP Mercury	9	Kamman	2000	Yes	NA

Program	Project #	Project Manager	Yr QAPP written / last updated	EPA Approval in Place?	Scheduled Update?
<b>Project</b>					
<b>Ag. Best Management Practice Effectiveness Monitoring</b>	10	USGS		USGS project. EPA approval not required.	
<b>Urban Best Management Practice Effectiveness Monitoring</b>	11	USGS		USGS project. EPA approval not required.	
<b><i>Biomonitoring</i></b>					
<b>Ambient Biomonitoring Network (ABN) Program</b>	12	Fiske/ Langdon	1994	Yes	??
<b>Lake Bioassessment Project</b>	13	Kamman	Procedures as in Project 2		
<b>Aquatic Macrophyte Monitoring Program</b>	14	Warren	1995	Yes	
<b>Aquatic Nuisance Species Searches and Surveys</b>	15	Bove	Procedures as in Project 17		
<b>Lake Champlain Zebra Mussel Monitoring Program</b>	16	Stangel/ Smeltzer	2005	Yes	2006

Program	Project #	Project Manager	Yr QAPP written / last updated	EPA Approval in Place?	Scheduled Update?
<b>Vermont Wetlands Bioassessment Project</b>	17	Burnham/ Popp	1999	Yes	Project Completed
<b>Biodiversity Monitoring Program</b>	Procedures as in Project 12				
<b>Northern Leopard Frog Surveys in the Lake Champlain Basin</b>	18	Levey	2001	Yes	NA
<b>Follow-up Biological Monitoring Projects</b>					
<b>SONAR</b>	19	Kellogg/ Bove	Procedures and assessment protocols same as project 13		
<b>CuSO4 Treatments</b>	20	Kellogg	Procedures and assessment protocols same as project 13		
<b><i>Citizen Programs:</i></b>					
<b>The Vermont Lay Monitoring Program</b>	21	Picotte	2004	Yes	
<b>Volunteer Acid Precipitation Monitoring Program</b>	22	Pembroke	None in place	no EPA funding	
<b>LaRosa Laboratory Volunteer Monitoring Analytical Grants Project</b>	23	Kamman	2005	Not subject to EPA Review per VT Program Liaison E. Beck	2006

Program	Project #	Project Manager	Yr QAPP written / last updated	EPA Approval in Place?	Scheduled Update?
<b>Nutrient Criteria Development Project</b>	24	Kamman	2004	Yes	
<b>Urban Stream Water Quality Monitoring Project</b>	25	Kellogg	2005	Yes	

#### Water Supply Division

No formal Quality Assurance Plan in effect in the Division. The Vermont Department of Health has a QAPP for water supply sampling work.

Program	Project #	Project Manager	Yr QAPP written / last updated	EPA Approval in Place?	Scheduled Update?
<b>New England States' Common Sample Collection &amp; Preservation Manual for Drinking Water</b>	1	Vermont Department of Health	10/1/2000	Yes	

#### Wastewater Management Division

No formal Quality Assurance Plan currently in affect or needed. The Division has several guidance documents covering the development of quality assurance manuals and for laboratory work done by treatment facilities regulated under the NPDES program.

#### Waste Management Division

Program	Project #	Project Manager	Yr QAPP written / last	EPA Approval in Place?	Scheduled Update?
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			updated		
<b>Site Management</b>					
<b>CERCLA Site Assessment Program</b>	1	Timothy Cropley	June 5, 2002	Yes	Yearly review for necessary updates
<b>LUST Trust Program</b>	1	Timothy Cropley	Expected in July 2003	No	Yearly review for necessary updates

Air Pollution Control Division

Program	Project #	Project Manager	Yr QAPP written / last updated	EPA Approval in Place?	Scheduled Update?
<b>Criteria Pollutants not including PM 2.5</b>	None	Ben Whitney	2003	Yes	As necessary
<b>PM 2.5</b>	None	George Apgar	2002	Yes	Annually
<b>PM 2.5 specification through EPA PM 2.5 Specification Trends Program</b>	None	George Apgar	2003	Yes	As necessary
<b>PM 2.5 Specification through IMPROVE Program</b>		George Apgar	2003	Yes	As necessary
<b>PM 2.5 continuous monitoring</b>	None	George Apgar	In Development for approval later this year	No	As necessary
<b>Air Toxics: VOCs, Carbonyls and Toxic Elements</b>	None	Robert Lacaillade	2004	Yes 3/30/04	As necessary

Program	Project #	Project Manager	Yr QAPP written / last updated	EPA Approval in Place?	Scheduled Update?
<b>Laboratory Services</b>	078	Gerald Divincenzo	1/12/2000	Yes	As required

## APPENDIX B



Agency of Natural Resources

Environmental Conservation

<http://www.anr.state.vt.us/dec/dec.htm>

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September 27, 2005

Gerald C Potamis, P. E., Manager  
VT State Program Unit  
EPA Region 1 - New England  
1 Congress Street  
Suite 1100 (CVT)  
Boston, MA 02114-2023

RE: Vermont 2004 to 2006 Performance Partnership Agreement – FFY 2006 Update

Dear Mr. Potamis,

As requested, Vermont agrees to update our 2004 to 2006 Performance Partnership Agreement to include the attached "Vermont PPA Priorities & Commitments List – June 27, 2005" and "Permit Integrity Profile Action Items for Vermont", with the changes negotiated between EPA Region 1 – New England and Vermont Department of Environmental Conservation staff.

Please see a copy of the "Vermont PPA Priorities & Commitments List – June 27, 2005" and "Permit Integrity Profile Action Items for Vermont" for reference. The table below lists the "Negotiated Changes" which are referenced to these documents.

Reference	Negotiated Change
P 1, Sub. Obj. 1.1.1 Vt 2	Vermont DEC will work with New Hampshire and New York to establish and implement an ozone and PM 2.5 forecasting capability by May 1, 2006.
P 2, Obj. 1.2 NE 1	Vermont DEC does not have authority to address indoor air in Vermont, this issue is addressed by the Department of Health in Vermont. Indoor air quality should not be part of the Vermont PPA as it is not part of the Clean Air Act.
P 2, Sub. Obj. 2.1.1 VT 1	The Vermont Department of Health is the laboratory certification officer in Vermont.
P 3, Sub. Obj. 2.2.1, NE2	Continue to implement ADB, with a goal of full implementation for lakes by April 1, 2007, and rivers by April 1, 2008
P 4, <i>STORET</i> , NE 1	Continue to annually submit physical and chemical monitoring data to Storet.
P 5, Sub. Obj. 3.1.1 VT 1	Vermont received subsequent authorization in August 2005 and will be updating our RCRA rules in FFY 2007 if significant new federal rules have been adopted.
P 6-7, Obj. 4.1	Vermont Agency of Agriculture, Markets and Food, and Vermont Department of Health implement these activities in Vermont.
P 7, Sub. Obj. 4.3.1	Not applicable, Vermont does not have estuaries at this time.
Action Item 1	The completion date entry should be changed to say: Region/VT to come to an understanding as to what the final goal should be for CSO work and the process that will be used to demonstrate whether or not the goal has been met.
Action Item 3	Action item completed.
Action Item 5	The entry in the milestone column should be changed to say EPA will meet with VT by March 2006 to discuss the assessment process that EPA will use.
Action Items 6 & 7	The action item should be rewritten to say: Due to uncertainty about EPA's ultimate response to the recent court decision, it is not possible to define action items and a completion date at this time. In the milestone column insert "The Region will provide status reports to VT every 3 months on EPA's progress in making needed decisions regarding the future federal CAFO program".

Vermont will be submitting a federal fiscal year 2005 end-of-year report to EPA Region 1 - New England in November of this year.

Sincerely,

Jeffery Wennberg, Commissioner

pc: Winslow Ladue

2006	<b>FINAL Vermont PPA Priorities &amp; Commitments List - Jun 27, 2005</b>	<b>EPA Contacts</b>
	<b>GOAL 1: CLEAN AIR &amp; GLOBAL CLIMATE CHANGE</b>	
	<b>Objective 1.1 Healthier Outdoor Air</b>	
	<b>Sub-Objective 1.1.1 More People Breathing Cleaner Air</b>	
	<i>Ground Level Ozone &amp; Fine PM</i>	
NE 1	In order to provide public real-time air quality information, continue to submit ozone and PM2.5 data and ozone and PM2.5 forecasts to the Data Management Center	Manager: Dave Conroy, 617-918-1661, Tech: Anne McWilliams 617-918-1697
NE 2	Participate in Northeast Diesel Collaborative	Manager: Dave Conroy 617-918-1661, Tech: Lucy Edmondson 617-918-1004
NE 3	Depending on litigation outcomes, address need to adopt, or show equivalency to, EPA's first set of NSR reforms.	Manager: Dan Brown 617-918-1048, Tech: Brendan McCahill 617-918-1652
VT 1	Continue to review and update as necessary Vermont's 2002 emissions data as reported in EPA's national emissions inventory database.	Manager: Dave Conroy 617-918-1661, Tech: Bob McConnell 617-918-1046
VT 2	Submit ozone and PM2.5 data and ozone and PM2.5 forecasts to the Data Management Center	Manager: Dave Conroy, 617-918-1661, Tech: Anne McWilliams 617-918-1697
VT 3	Submit wood furniture rule SIP revision to EPA.	Manager: Dave Conroy 617-918-1661, Tech: Anne Arnold 617-918-1047
	<i>Regional Haze</i>	
NE 1	Participate in the northeast regional haze planning organization Mid-Atlantic and Northeast States Visibility Union (MANE VU).	Manager: Dave Conroy 617-918-1661, Tech: Anne McWilliams 617-918-1697
NE 2	Based on MANE VU template, develop regional haze SIP, with BART provisions, for submittal to EPA by December 2007.	Manager: Dave Conroy 617-918-1661, Tech: Anne McWilliams 617-918-1697
	<i>Title V Permits</i>	
NE 1	Complete issuance of initial Title V permits.	Manager: Dan Brown 617-918-1661, Tech: Donald Dahl 617-918-1657, Ida McDonnell 617-918-1653

NE 2	Issue renewal permits	Manager: Dan Brown 617-918-1661, Tech: Donald Dahl 617-918-1657, Ida McDonnell 617-918-1653
VT 1	Work with EPA to review State Title V Program	Manager: Dan Brown 617-918-1661, Tech: Donald Dahl 617-918-1657, Ida McDonnell 617-918-1653
<b>Sub-Objective 1.1.2 Reduced Risk from Toxic Air Pollutants</b>		
<i>Air Toxics</i>		
NE 1	Continue delegation and implementation of MACT standards.	Manager: Dan Brown 617-918-1048, Tech: Susan Lancey 617-918-1656
NE 2	Explore strategies to reduce human health risks indicated by state and national air toxics assessment analyses, including through coordination with indoor air quality programs.	Manager: Dan Brown 617-918-1048, Tech: Susan Lancey 617-918-1656, Marybeth Smuts 617-918-1512
NE 3	Participate in NEG/ECP mercury task force and work to implement strategies under mercury action plan.	Manager: Dave Conroy 617-918-1661, Tech: Jeri Weiss 617-918-1568
NE 4	By September 2006, submit section 111(d) plans for mercury emissions from power plants.	Manager: Dan Brown 617-918-1048, Tech: Donald Dahl 617-918-1657

2006	<b>FINAL Vermont PPA Priorities &amp; Commitments List - Jun 27, 2005</b>	<b>EPA Contacts</b>
<b>Objective 1.2 Healthier Indoor Air</b>		
NE 1	Work with EPA to implement Tools for Schools and Environmental Tobacco Smoke projects	Manager: Dan Brown 617-918-1048, Tech: Eugene Benoit 617-918-1639, Marybeth Smuts 617-918-1512
<b>Objective 1.3 Protect the Ozone Layer</b>		
<b>Objective 1.4 Radiation</b>		
<b>Sub-Objective 1.4.1 Enhance Radiation Protection</b>		
<b>Sub-Objective 1.4.2 Maintain Emergency Response Readiness</b>		
	EPA will continue to work with the New England states on Homeland Security and emergency response readiness issues through routine, day-to-day coordination and the existing Regional Response Team mechanism.	Manager: Art Johnson 617-918-1251, Tech: Anthony Honnellio 617-918-1456

	<b>Objective 1.5 Reduce Greenhouse Gas Intensity</b>	
NE 1	Participate in NEG/ECP climate change steering committee and work to implement strategies under Climate Change Action Plan	Manager: Dave Conroy 617-918-1661, Tech: Bill White 617-918-1333, Norm Willard 617-918-1812
	<b>Objective 1.6 Enhance Science &amp; Research</b>	
	<b>Sub-Objective 1.6.1 Provide Science to Support Air Program</b>	
	<i>Air Monitoring</i>	
NE 1	Monitoring Network: Implement initial EPA approved changes to the air monitoring network to transition from the traditional NAMS/SLAMS framework to the National Core (Ncore) framework for ambient air monitoring in the US as detailed in the National Ambient Air Monitoring Strategy - Final Draft," April 2004.	Norm Beloin 617-918-8387
NE 2	Air Monitoring Data -- Operate EPA-approved network, enter the air monitoring, precision and accuracy data into AQS within 90 days of the end of each calendar quarter and submit the annual SLAMS report by July 1.	Norm Beloin 617-918-8387
NE 3	Toxics Air Monitoring -- Continue operation of the toxics air monitoring sites including mercury monitoring sites and enter the data into AQS.	Norm Beloin 617-918-8387
NE 4	Quality Assurance -- Update all approved QAPPs annually. Submit a revised PM2.5 quality assurance project plan.	Norm Beloin 617-918-8387
	<b>Sub-Objective 1.6.2 Conduct Air Pollution Research</b>	
	<b>GOAL 2: CLEAN &amp; SAFE WATER</b>	
	<b>Objective 2.1 Protect Human Health</b>	
	<b>Sub-Objective 2.1.1 Water Safe to Drink</b>	
	<i>Certification of Drinking Water Labs</i>	
VT 1	Maintain laboratory certification for state labs; follow up on any action items resulting from laboratory audits; maintain required schedule for private laboratory inspections	Manager: Alan Peterson 617-918-8322, Tech: Art Clark, 617-918-8374
	<i>Source Water Protection</i>	
VT 1	Continue to support implementation of local programs and, where appropriate, continue to integrate source water protection implementation into other programs appropriate (e.g., UIC, stormwater)	Manager: Karen McGuire 617-918-1711, Tech: Kira Jacobs 617-918-1817
VT 2	Complete SWAPs	Manager: Karen McGuire 617-918-1711, Tech: Kira Jacobs 617-918-1817

	<i>Drinking Water</i>	
VT 1	Continue to implement all health based standards with a goal of meeting a target of 93% of the population served by community water systems meeting all applicable standards through effective treatment and source water protection	Manager: Karen McGuire 617-918-1711, Tech: Tony Ciccarelli 617-918-1609
VT 2	LT2/Stage2: coordinate with the Region on early implementation issues	Manager: Karen McGuire 617-918-1711, Tech: Kevin Reilly 617-918-1694
VT 3	Sanitary surveys: conduct sanitary surveys of CWSs once every three years and surveys of NCWSs once every five years	Manager: Karen McGuire 617-918-1711, Tech: Tony Ciccarelli 617-918-1609
VT 4	Data verifications: follow-up/correction of deficiencies noted in DVs	Manager: Karen McGuire 617-918-1711, Tech: Tony Ciccarelli 617-918-1609
VT 5	Security/Emergency Response: continue to coordinate with EPA on security workshops and drills	Manager: Jane Downing 617-918-1571, Tech: Kevin Reilly 617-918-1694
VT 6	Continue to follow-up on any LCR action items	Manager: Karen McGuire 617-918-1711, Tech: Ellie Kwong 617-918-1592
VT 7	Maintain timely and accurate reporting to SDWIS	Manager: Karen McGuire 617-918-1711, Tech: Josh Nemzer 617-918-1961
VT 8	Primacy: submit LT1 package and develop rule/policy for cross connection control	Manager: Karen McGuire 617-918-1711, Tech: Tony Ciccarelli 617-918-1609
	<i>UIC</i>	
VT 1	Continue to close identified Class V motor vehicle waste disposal wells; continue to report UIC activities to EPA per 7520 form (e.g., number of inspections conducted, number of permits issued, etc.)	Manager: Karen McGuire 617-918-1711, Tech: Dave Delaney 617-918-1614
	<b>Sub-Objective 2.1.2 Fish &amp; Shellfish Safe to Eat</b>	
	<b>Sub-Objective 2.1.3 Water Safe for Swimming</b>	
	<b>Objective 2.2 Protect Water Quality</b>	
	<b>Sub-Objective 2.2.1 Improve Water Quality on a Watershed Basis</b>	
	<b>Watershed Assessment/Monitoring</b>	
	<i>303(d)/305(b)</i>	
NE 1	Submit narrative 305(b) and 303(d) Integrated Report and electronic files as well as an updated CALM by April 1, 2006.	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377
NE 2	Fully implement ADB by Sept. 30, 2006	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377
NE 3	Georeference waters to NHD (1:100,000 or finer resolution)	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377

VT 1	Implement ADB and adopt an Integrated Report approach by Sept. 30, 2006	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377
	<i>Monitoring</i>	
NE 1	Implement final comprehensive water monitoring strategy covering lakes, rivers, estuaries, during FY2006	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377
NE 2	Report on outcomes of monitoring activities using FY2005 106 supplemental funding for monitoring by Sept. 30, 2006, and prepare workplan for FY2006 106 supplemental funds by May 15, 2006 (see regional 106 supplemental funding guidance attached).	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377

<b>2006 FINAL Vermont PPA Priorities &amp; Commitments List - Jun 27, 2005</b>		<b>EPA Contacts</b>
NE 3	Add draft wetlands coverage to strategies by Sept. 30, 2006	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377
	<i>STORET</i>	
NE 1	Begin providing routine annual (at minimum) uploads of physical, chemical and biological data to STORET by Sept. 30, 2006	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377
	<b>Watershed Protection</b>	
	<i>Water Quality Standards - Biological, Nutrient, Temperature</i>	
NE 1	Continue development of numerical biological criteria for streams and lakes/ponds	Manager: Katrina Kipp 617-918-8309, Tech: Hilary Snook 617-918-8670
NE 2	Continue efforts toward addressing flow quantity and water level issues to ensure protection of instream waters uses.	Manager: Stephen Silva 617-918-1561, Tech: Ralph Abele 617-918-1629
VT 1	Continue coordination with the Water Resources Board and EPA to resolve issues concerning the reclassification of waters to water management types.	Manager: Stephen Silva 617-918-1561, Tech: William Beckwith 617-918-1544
VT 2	Work with the Water Resources Board and EPA to resolve outstanding issues concerning VT's Limited Duration Activities provision and to develop and adopt an antidegradation implementation procedure.	Manager: Stephen Silva 617-918-1561, Tech: William Beckwith 617-918-1544
VT 3	Continue to develop nutrient criteria in accordance with the Nutrient Criteria Development and Adoption Plan	Manager: Stephen Silva 617-918-1561, Tech: Al Basile 617-918-1599
	<i>Protect and Improve Water Quality on a Watershed Basis</i>	
NE 1	Using the PPA process, 303(d) list, the nonpoint source RFP, and other state processes, identify priority watersheds and water bodies for the state to focus effort to protect and improve water quality.	Manager: Gerald Potamis 617-918-1651 or Lynne Hamjian 617-918-1601
NE 2	In those priority watersheds, leverage existing tools such as the state's TMDL, nonpoint source, water quality, permit, SRF grant, and source water assessment programs to concentrate implementation efforts and to measure improvements.	Manager: Gerald Potamis 617-918-1651 or Lynne Hamjian 617-918-1601

NE 3	Periodically provide input to EPA-New England on draft regional watershed game plan. Work collaboratively with the region to better measure and report results annually.	Manager: Gerald Potamis 617-918-1651 or Lynne Hamjian 617-918-1601
	<i>NPS 319</i>	
NE 1	Continue to use the 2004 Nonpoint Source Program and Grants Guidelines for States and Territories to identify eligible activities and program priorities. The areas listed below are of special concern to EPA:	Manager: Gerald Potamis 617-918-1651, Tech: Eric Perkins 617-918-1602
NE 2	Continue to work with other government agencies to influence the targeting of a portion of the Farm Bill Programs (e.g., EQIP) to areas of environmental concern (i.e., impaired waters, fragile waters in need of protection, and a watershed approach).	Manager: Gerald Potamis 617-918-1651, Tech: Eric Perkins 617-918-1602
NE 3	Continue to increase the NPS program performance in the restoration of impaired waters. EPA encourages each state to identify priority segments or watersheds for NPS funding as part of its RFP process.	Manager: Gerald Potamis 617-918-1651, Tech: Eric Perkins 617-918-1602
NE 4	Continue to enter all 319 grant dollars and mandatory data elements into the Grants Reporting Tracking System (GRTS) by March 30th of each year.	Manager: Gerald Potamis 617-918-1651, Tech: Eric Perkins 617-918-1602
NE 5	Continue to ensure that watershed based plans developed using incremental dollars portion of the 319 funds will contain the 9 (a- i) elements specified in the 2004 guidance.	Manager: Gerald Potamis 617-918-1651, Tech: Eric Perkins 617-918-1602
VT 1	Continue to ensure that all 319 projects will comply with EPA quality assurance requirements. States are encouraged to seek delegation for approval of QAPPs for all 319 project funded by them.	Manager: Gerald Potamis 617-918-1651, Tech: Eric Perkins 617-918-1602
	<i>NPDES Development</i>	

<b>2006</b>	<b>FINAL Vermont PPA Priorities &amp; Commitments List - Jun 27, 2005</b>	<b>EPA Contacts</b>
VT 1	Work with the Region to implement the "Opportunities for Enhancement" (also known as Action Items) that have been identified through the Permit Integrity Profile process. The State will, at a minimum, complete those items targeted for FY 06.	Manager: Roger Janson 617-918-1621
VT 2	The State will continue its progress to reduce and maintain the NPDES permit backlog to a level of no greater than 10%.	Manager: Roger Janson 617-918-1621
VT 3	The State will make every effort to assure that it will issue and maintain current at least 95% of the "Priority Permits" that it has identified for each fiscal years beginning with FY 05 and continuing into FY 06 and 07.	Manager: Roger Janson 617-918-1621
VT 4	The State will take all necessary steps to implement its strategy for issuing CAFO permits that meet the minimal requirements of the Federal program.	Manager: Roger Janson 617-918-1621
VT 5	Continue to implement delegated NPDES storm water program, including Phase II MS4 permits, construction permits and industrial permits.	Manager: David Webster 617-918-1577 Tech: Thelma Murphy 617-918-1615
VT 6	Issue the industrial and small construction permits.	Manager: David Webster 617-918-1577, Tech: Thelma Murphy 617-918-1615

	<i>TMDL Development</i>	
NE 1	Complete any remaining prior year TMDL commitments.	Manager: Stephen Silva 617-918-1561
NE 2	Commit to completion of an additional number of TMDLs for FY06, and provide a tentative list of waterbodies involved (future substitutions allowed).	Manager: Stephen Silva 617-918-1561
NE 3	Participate in Region 1/State TMDL Innovations effort to improve environmental effectiveness of the TMDL program.	Manager: Stephen Silva 617-918-1561
VT 1	Suggested TMDL commitment target range for FY06: 10-19	Manager: Stephen Silva 617-918-1561 Tech: Eric Perkins 617-918-1602
	<b>Sub-Objective 2.2.2 Improve Coastal &amp; Ocean Waters</b>	
	<b>Objective 2.3 Science &amp; Research</b>	
	Primarily Lead by EPA	
	<b>Sub-Objective 2.3.1 Apply Best Available Science</b>	
	Primarily Lead by EPA	
	<b>Sub-Objective 2.3.2 Conduct Leading Edge Research</b>	
NE 1	Participate as feasible in New England REMAP Lakes and Ponds Study (NELAP), Biological Condition Gradient (BCG) workgroup, other biological/water quality monitoring activities, and attend relevant regional meetings/conferences (e.g., NEAEB)	Manager: Katrina Kipp 617-918-8309, Tech: Hilary Snook 617-918-8670
NE 2	Participate as feasible in EPA national Wadeable Streams Assessment and national Lakes and Ponds Assessment	Manager: Katrina Kipp 617-918-8309, Tech: Hilary Snook 617-918-8670
NE 3	Participate as feasible in northeast Ecoregionalization Project, if funding is obtained	Manager: Katrina Kipp 617-918-8309, Tech: Diane Switzer 617-918-9377
	<b>GOAL 3: LAND PRESERVATION &amp; RESTORATION</b>	
	<b>Objective 3.1 Preserve Land</b>	
	<b>Sub-Objective 3.1.1 Reduce Waste Generation &amp; Increase Recycling</b>	
	<i>RCRA Authorization</i>	
VT 1	Submit draft rules covering EPA rules from 06/30/03 through 06/30/06 (8+ rules)	Manager: Ernest Waterman 617-918-1369 Tech: Sharon Leitch 617-918-1647

**2006VT** **FINAL Vermont PPA Priorities & Commitments List - Jun 27, 2005 EPA Contacts RCRA Permit Renewals** Renew TSDf permits at 2 of 4 sites on FFY06-08  
 1 NE 1 GPRa permit renewals baseline Manager: Ernest Waterman 617-918-1369 Tech: Sharon Leitch 617-918-1647 *Resource Conservation Challenge* Participate in  
 NE 1 discussions and possible collaboration on projects related to the RCC National Priority Areas( 35% recycling with focus on organics, paper and packaging,  
 NE 2 beneficial use with focus on coal combustion products, foundry sand and construction and demolition debris, reduction of toxics chemicals and electronics).  
 NE 3 Manager: Cynthia Greene 617-918-1813 **Sub-Objective 3.1.2 Manage Hazardous Wastes & Petroleum Products Properly UST PPG eligible - all states except**  
 NE 1 *Massachusetts; MA State Fire Marshal has its own categorical grant.* Improve UST Operational Compliance: (a) maintain or increase number of field inspections to  
 VT 1 determine significant operational compliance. Manager: Larry Brill 617-918-1301, Tech: Andrea Beland 617-918-1313 Improve UST Operational Compliance: (b)  
 continuing to improve operational compliance by 1% over rate of previous year. Manager: Larry Brill 617-918-1301, Tech: Andrea Beland 617-918-1313 Reduce  
 Number of Confirmed UST Releases Annually -Regional target of <400; between FY99 and FY04, confirmed releases averaged 522 (4% of National total).  
 Manager: Larry Brill 617-918-1301, Tech: Andrea Beland 617-918-1313 **Objective 3.2 Restore Land Sub-Objective 3.2.1 Prepare for & Respond to Intentional**  
**& Accidental Releases** EPA will continue to work with the New England states on Homeland Security and emergency response readiness issues through routine,  
 day-to-day coordination and the existing Regional Response Team mechanism. Manager: Art Johnson 617-918-1251, Dave McIntyre 617-918-1281, Steve Novick  
 617-918-1271, Tech: Cosmo Caterino 617-918-1264 **Sub-Objective 3.2.2 Clean Up & Reuse Contaminated Land** LUST Not PPG eligible - funds are in separate  
 LUST Trust Cooperative Agreement. Reducing the Clean-up Backlog: The National target for annual clean -ups completed of releases from leaking underground  
 storage tanks (LUSTs) is currently under negotiation. At midyear of FY05, cumulative number of 11,897 LUSTs clean-ups were completed in New England, with a  
 backlog of 4,094. Manager: Larry Brill 617-918-1301, Tech: Andrea Beland 617-918-1313 **Sub-Objective 3.2.3 Maximize Potentially Responsible Party**  
**Participation & Superfund Sites Objective 3.3 Enhance Science & Research Sub-Objective 3.3.1 Provide Science to Preserve & Remediate Land**  
**Sub-Objective 3.3.2 Conduct Research to Support Land Activities GOAL 4: HEALTHY COMMUNITIES & ECOSYSTEMS Objective 4.1 Chemical, Organism**  
**& Pesticide Risks Sub-Objective 4.1.1 Reduce Human Exposure to Toxic Pesticides** *Pesticides Program* Current measures specified in state-specific  
 workplans to maintain comprehensive pest management program. Primary coordination for VT State Program is pesticides and water quality issues. Manager: Kristi  
 N. Rea 617-918-1595, Tech: Robert Koethe 617-918-1535 **Sub-Objective 4.1.2 License Pesticides**

2006 <b>FINAL</b> Vermont PPA Priorities & Commitments List - Jun 27, 2005		EPA Contacts
	<b>Sub-Objective 4.1.3 Reduce Chemical &amp; Biological Risks</b>	
	<i>PCB Program</i>	
VT 1	Coordination by VT State cleanup programs and disposal/storage permits with TSCA PCB Program.	Manager: Kristi N. Rea 617-918-1595, Tech: Kim Tisa 617-918-1527
	<i>Lead Program</i>	
VT 1	Coordination on VT lead poisoning efforts and issues with EPA grantee (e.g. State Department of Public Health, or other entity) and with EPA NE Lead Program as appropriate.	Manager: Kristi N. Rea 617-918-1595, Tech: James Bryson 617-918-1524
	<i>Asbestos Program</i>	
VT 1	Coordination on VT asbestos issues with EPA grantee (e.g. State Departments of Public Health or other entity) and with EPA NE Asbestos Program as appropriate.	Manager: Kristi N. Rea 617-918-1603
	<b>Sub-Objective 4.1.4 Reduce Risk at Facilities</b>	
	<b>Objective 4.2 Communities</b>	
	<b>Sub-Objective 4.2.1 Sustain Community Health</b>	
	<b>Sub-Objective 4.2.2 Restore Community Health</b>	
	<i>Environmental Justice</i>	
NE 1	Identify agency or programmatic point(s) of contact to define and implement activities that advance EJ within state programs. Meet quarterly to review progress with regional EJ and/or other EPA program representatives.	Manager: Lois Adams 617-918-1591
	<b>Sub-Objective 4.2.3 Assess &amp; Clean Up Brownfields</b>	
	<i>Brownfields</i>	
NE 1	Each state receives funding from the Brownfields Program through a Brownfields State Response Program Cooperative Agreement issued under the new Brownfields law, (CERCLA, Section 128(a)). Using this funding, each state will continue to develop program capability and assist grantees.	Manager: Mary Sanderson 617-918-1381, Carol Tucker 617-918-1221, Tech: Diane Kelley 617-918-1424
	<b>Objective 4.3 Ecosystems</b>	
	<b>Sub-Objective 4.3.1 Protect &amp; Restore Ecosystems</b>	
	<i>National Estuary Program</i>	
NE 1	Provide administrative, technical, and financial support to the National Estuary Programs in your state.	Manager: Mel Cote, 617-918-1553, Tech: Margherita Pryor, 617-918-1597
NE 2	Disseminate national and regional guidance and award monies in a timely fashion.	Manager: Mel Cote, 617-918-1553, Tech: Margherita Pryor, 617-918-1597

	<b>Sub-Objective 4.3.2 Increase Wetlands</b>	
	<i>Wetlands</i>	
VT 1	For each year of the PPA the wetlands program will develop a work plan which identifies and describes how the program will work towards building and refining any element of a comprehensive wetland program specific to HQ and regional guidance on the subject.	Manager: Matt Schweisberg 617-918-1628, Tech: Beth Alafat 617-918-1399
VT 2	For each year of the PPA, produce the Annual Wetland Status and Trends Report which will assess strengths and deficiencies in the base program, identify areas of new or increased emphasis, recent program changes, innovations, emerging issues and future program objectives, and permitting information. Every five years (2005, 2010 etc.) look at trends and patterns for the previous five years.	Manager: Matt Schweisberg 617-918-1628, Tech: Beth Alafat 617-918-1399
VT 3	Continue to participate in the NEBAWWG biological monitoring and assessment initiative.	Manager: Matt Schweisberg 617-918-1628, Tech: Jeanne Voorhees 617-918-1686
	<b>Objective 4.4 Enhance Science &amp; Research</b>	

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	<b>Sub-Objective 4.1.1 Apply the Best Available Science</b>	
	<b>Sub-Objective 4.1.2 Conduct Relevant Research</b>	

**GOAL 5: COMPLIANCE & ENVIRONMENTAL STEWARDSHIP - Objectives 5.1 and 5.2**

Through this document, EPA New England's Office of Environmental Stewardship (OES) provides Guidance to the New England State Environmental Agencies on the preparation and submission of Compliance, Assistance and Innovative Program Strategies as part of their FY2006 Performance Partnership Agreements (PPAs) with EPA. This Guidance reflects the direction set by EPA in its FY2006 Update to the FY 2005 - 2007 Office of Enforcement and Compliance Assurance (OECA) National Program Guidance. The OECA Program Guidance provides a national, strategic context for compliance and assistance program implementation and is an important document for understanding regional-state relations.

**National FY2006 Priorities**

EPA's Office of Enforcement and Compliance Assurance (OECA) FY2006 national priorities are:  
 CWA - Wet Weather (CSOs, SSOs, CAFOs and Stormwater) CAA - New Source Review/Prevention of Significant Deterioration CAA - Air Toxics RCRA - Mineral Processing RCRA - Financial Assurance Tribal Oversight/State Reviews Petroleum Refining (not applicable in the Region)

FY2006 OES Cross-Office Priorities The following programs or sectors are either Integrated Strategies (involving aspects of traditional enforcement, assistance and innovative programs) or are newly-identified FY 06 priorities for the Office of Environmental Stewardship.

*Bacteria in Water Diesel Idling Lead Poisoning Tribal Healthcare Boat Building New Business in Old Mills Sand and Gravel*

OES will continue to utilize both compliance assistance and enforcement to institutionalize Environmental Justice (EJ) into the office's programs and daily activities. OES expects to increase targeting activities in communities or areas which display disproportionately high and adverse human health or environmental effects on minority and low-income populations.

### **General Guidance**

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### **FINAL Vermont PPA Priorities & Commitments List - Jun 27, 2005 EPA Contacts**

EPA believes that compliance activities are critically important for the accomplishment of two goals:

1. 1. To use as a tool in concert with other activities to achieve a specific environmental goal (such as protection of a specific watershed), and
2. 2. To undertake as a stand-alone measure to ensure compliance, achieve deterrence and go beyond compliance where possible .

#### **Cross-Cutting Priorities**

EPA encourages each state to include in its compliance strategy at least one initiative that is multimedia, sector-based, or place-based (community, geographic or ecosystem)

#### **Procedure for New Initiatives**

On occasion, OES or state environmental agencies begin new initiatives or programs after the completion of negotiations for one PPA (or amendment) and prior to the start of the negotiation for the next PPA (or amendment). This section describes steps that agencies should take in proposing and negotiating new initiatives or programs outside the PPA negotiation cycle.

New initiatives or programs can originate in OES or in a state environmental agency. For the purpose of this Guidance, "new initiatives or programs" shall be those

.a. which neither agency contemplated during the most recent PPA negotiations, and

. b. that either agency must implement prior to the next PPA negotiations, and+C25

c. that will have a significant impact (greater than 5%) on allocation of resources to programs and/or the outputs anticipated in the current PPA. When the Director of OES or a state enforcement coordinator identifies a new initiative or program, he/she will notify the other by letter within thirty days. The letter should describe the new initiative or program including why implementation must occur prior to the next PPA negotiation. The letter should also describe the resources needed to implement the new initiative or program and the impact on the programs or outputs in the current PPA.

Upon sending or receiving such a letter, the OES state PPA liaison will schedule a meeting or conference call within thirty days to discuss and resolve the issues with the State Enforcement Coordinator and other staff as appropriate.

Among possible adjustments may be a reallocation of resources, reduction of some types of outputs accompanied by matching increases in outputs for the new initiative or program or a decision to delay implementation and discuss the initiative in the next PPA cycle.

The OES state PPA liaison will document the results of the meeting as an addendum to the state PPA Compliance Strategy, signed by the OES PPA liaison and authorized state manager

#### **Enforcement and Compliance Assurance Goals and Expectations FINAL Vermont PPA Priorities & Commitments List - Jun 27, 2005 EPA Contacts**

States are asked to address the following national goals and regional expectations in the Compliance Strategy portion of the PPA.

Provide a credible deterrent and promote compliance by–

1) Correcting past and deterring future environmental harm by ensuring immediate, full, and continuous compliance with environmental protection laws;

2) Using an integrated range of enforcement and compliance assurance tools (compliance assistance, incentive policies and programs, compliance monitoring, civil and criminal enforcement actions); and

3) Applying these tools to noncompliance patterns and environmental/human health problems associated with sectors, communities, or geographic areas.

### EPA New England Enforcement and Compliance Expectations

- 1) Maintain and implement an adequate compliance monitoring capacity.
- 2) Maintain and implement an adequate capacity for enforcement response.
- 3) Maintain adequate communications and coordination with EPA, including regular updating of national data systems and regular discussions regarding compliance monitoring, and enforcement response activities.
  
- 4) Use performance measurement as a means of driving outcome-oriented results, identifying program priorities and informing resource allocation as outlined in the Office of Management and Budget Program Assessment Rating Tool (PART) Guidance (<http://www.whitehouse.gov/omb/part>).

### Significant Non-Compliance

As in prior years, EPA is asking each state to commit to identify and address significant noncompliers. The suggested language for inclusion in each compliance strategy remains the same:

“According to national enforcement policy, implementers of programs to enforce the Clean Air Act, the Clean Water Act, the Safe Drinking Water Act, and the Resource Conservation and Recovery Act are required to identify and address significant noncompliers to minimize or eliminate risk to human health and the environment. To this end, the state commits to (1) undertake targeting strategies and inspection protocols designed to identify significant noncompliance, (2) identify detected significant noncompliers in national enforcement databases, (3) communicate and coordinate with EPA on the enforcement action undertaken in response to the significant noncompliance, and (4) address these identified facilities with enforcement responses sufficient to ensure compliance and recovery of penalties. Monetary penalties recovered should be in accordance with federal and state penalty policies, but never less than the economic benefit of noncompliance and a gravity-based penalty sufficient to deter further noncompliance.”

### Compliance Assistance, P2, Innovative Programs, Sustainability Goals and Expectations **FINAL** Vermont PPA Priorities & Commitments List - Jun 27, 2005 EPA Contacts

2006	<b>FINAL</b> Vermont PPA Priorities & Commitments List - Jun 27, 2005	EPA Contacts
	We encourage states to include those activities that go beyond the bounds of federal regulatory authorities or grant funding. We invite states to join or coordinate with efforts ongoing in the Assistance and Pollution Prevention Office of EPA-New England. In the future, OES intends to strengthen its partnership with state agencies on the development and implementation of important regional strategies that incorporate	

considerations of assistance, sustainability and innovations.

1) Maintain adequate communications and coordination with EPA, including regular discussions regarding compliance assistance activities.

2) Use compliance assistance as one tool to encourage compliance.

3) Promote effective integration and coordination at the state among media compliance programs and between pollution prevention and enforcement staff.

#### **OES PPA Liaisons**

NE OES has designated a PPA liaison for each New England state. These individuals are OES managers. The liaisons represent all OES programs and are the primary points of contact for all PPA-related issues for their state. They will work closely with the Office of Ecosystem Protection (OEP) state director and the state agency enforcement and assistant coordinators. They will assist the state in developing its Compliance, Assistance and Innovative Programs Strategy, coordinate all OES review, comment and negotiation on PPA drafts and make recommendations to the OES and OEP Directors on concurrence with the PPA. Numerous other OES program managers and staff play a role reviewing and concurring with PPAs. They may contact their state counterparts to clarify and resolve PPA issues.

VT **Vermont DEC - Ken Rota - 617-918-1751 - Rota.Ken@EPA.gov**

General Fax for all OES PPA Liaisons - 617-918-1810

Direct Fax - 617-918-0 + last three numbers of telephone # above

Recommended Format for PPAs, Inspection Projections and End-of-Year Reports

As the PPAs have evolved during the past nine years, each New England state has developed a unique approach to describing its environmental compliance, assistance and innovation programs and strategies. OES recognizes that a standardized approach for presentation of compliance, assistance and innovation strategies in PPAs is not appropriate. In some cases states collect all information in a single compliance, assistance and innovation programs chapter. Other states spread this information across several media chapters.

Nonetheless, it is important for OES to understand state compliance, assistance and innovation program plans and commitments as a whole.

We request that each state provide its OES liaison with draft PPA documents formatted to facilitate the review process. You can accomplish this with a

compliance, assistance and innovation programs chapter; media chapters with compliance, assistance and innovation program sections; a supplemental compliance, assistance and innovation programs document that collects information located throughout a PPA; or some other approach that achieves this goal. What we are trying to avoid is reviewing draft documents in which the compliance, assistance and innovation program information is scattered in many of locations with no obvious way to review it as a whole. We encourage state enforcement coordinators to work out an acceptable approach with their OES liaison early in the drafting process.

### **Inspection Projections and End-of-Year Reports**

OES understands that each state has a different PPA cycle, ranging from one to three years and that the level of detail may vary depending on whether this is the first year or a subsequent one for a PPA. First-year PPAs should contain descriptions of the state's compliance, assistance and innovative programs, how they will implement both base programs and national, regional and state priorities, and the environmental outcomes they expect. This should include projections for FY 06 inspections.

For 2<sup>nd</sup> or 3<sup>rd</sup> year PPAs, states must provide FY 06 compliance plans either in end-of-year reports or under separate cover, by the end of the calendar year. **End-of-year or separate reports projecting compliance plans for FY2006 are due by December 31, 2005.** Compliance plan updates for FY 2006 should contain the following information:

Indicate significant changes to state priorities made from the previous year, and briefly describe the rationale for these changes.

Itemize projected objectives, inspections and assistance activities planned for the upcoming year.

EPA encourages states to identify a small number of outcome measures it plans to use for assessing improved performance or the environmental results of activities. As we strive to upgrade measurement from merely reporting the number of outputs performed, state inclusion of outcome measurement in end of year reports will help point the way.

Aside from updating the compliance plan, the main purpose of the end-of-year report is to capture state performance relative to commitments identified in the state's compliance strategy and significant environmental or compliance related outcomes. This sort of outcome information is not adequately collected through reports to national media data bases. The report should describe the outputs and outcomes for each of the strategic areas and priorities identified in the compliance strategy and assess the results achieved.

#### **FINAL Vermont PPA Priorities & Commitments List - Jun 27, 2005 EPA Contacts**

With regard to compliance activities as a tool, the state should describe how it integrates enforcement and compliance activities to achieve specific environmental goals and priorities. As an example, safe waste management is a federal and state environmental protection goal--states should describe the planned activities which contribute to achieving this goal, such as regulatory development, remediation schedules, permitting, assistance, and compliance monitoring and enforcement, etc.

Specific Guidance for Core Programs and Priorities To assist the states in understanding federal expectations for compliance, assistance and innovation activities, OES is providing the following information that describes national and regional priorities. We strongly encourage states to consider the appropriate state role in these priorities. The information provided describes:

A summary of the media-specific compliance, assistance, and innovation initiatives identified for the upcoming fiscal year by OECA in Washington, along with those initiatives that the region has decided will be priorities for EPA New England and recommended priorities for New England states.

A summary of the cross-cutting compliance initiatives currently being considered by EPA New England for the upcoming fiscal year. A summary of OES Integrated Strategies and Innovation, Assistance and Pollution Prevention Programs which the states may want to be aware of for coordination purposes.

**WATER: N=National Priority, R=Regional Priority, H=High Relative Priority, N=Negotiable**

*CSO Compliance*

Emphasis on dry weather discharges - N, R, H Ensure that Nine Minimum Controls (NMC) for each CSO community are in enforceable mechanisms - N, R, H

Assist Region 1 with report to EPA-HQ on implementation status of NMC and LTCP's for each CSO community -N, R, H CSO communities currently unaddressed - N, R, N

*SSO Compliance*

ID universe and conduct inventory of SSO's in Region - N, R, H Implement unauthorized discharges tracking system - R, H Upon finalization of the national multi-year (FY 05-07) SSO goal performance strategy (currently due out by July 1, 2005), ensure compliance of expected percentage of SSO Universe - N,R, H

*CAFO Strategy*

Identify the lead state agency for CAFO permits & inspections - N, R, N Provide the name and location of each CAFO, the # and type of animals managed, and the receiving water and watershed - N, N Discuss the permitting and inspections strategies - N, N

*Industrial Storm Water*

Discharges - sector-based targeting with watershed overlay - R, H

Develop and implement Phase II strategy with blend of assistance and enforcement - R, H

*Pretreatment*

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SIU: ID Significant Industrial Users in non-approved pretreatment programs; enforce against non - compliers -N, R, H for delegated states; N, R, N for non-delegated states Pretreatment Compliance Inspections - Region 1 expects 20% PCI's annually from non-delegated states - N, R, H for non-delegated states

*Core Water Program*

Major Coverage: Articulate Strategy for major source coverage if deviation from annual inspection; include

rationale for minor source substitutions - N, R, H

*DMR Data Integrity:*

1. 1. Enforce against significant non-reporters - N, R, H
2. 2. Maintain national data base - N, R, H Resolution of SNC's: Ensure <2% of all majors are on the exception list at any one time; provide Watch List explanations - N, R, H

**DRINKING WATER: N=National Priority, R=Regional Priority, H=High Relative Priority, N=Negotiable**

*Microbial Regulations*

Compliance and enforcement of Surface Water Treatment Rule (SWTR) - N, R, H Continue compliance and enforcement of Interim Enhanced SWTR and Disinfection Byproducts Rule - N, R, H

*Arsenic Rule*

Compliance and Enforcement of the Arsenic Rule - N, R, H

*Total Coliform Rule*

Compliance and enforcement of Total Coliform Rule (TCR) - N, R, H

*Lead and Copper Regulations*

Target based on risk to sensitive population - N, R, H SDWIS Data Integrity: Improve data quality/integrity. Enter data into state systems and transfer to SDWIS - N, R, H SNC Resolution: 100% of microbial, chemical, radiological, and large/medium systems that are in noncompliance with the Pb/Cu Rule and address 85% of small systems that are in noncompliance with Pb and Cu rule - N, R, H

**CLEAN AIR ACT: N=National Priority, R=Regional Priority, H=High Relative Priority, N=Negotiable**

*Diesel Emissions*

Diesel idling enforcement/compliance assistance and outreach - R, N

*Ozone Non-Attainment*

Focus on NOx and VOC reductions - R, N

*Emissions Compliance*

Stack test major sources that have not recently conducted testing - N, R, H

PSD/NSR Investigations - N, R, H

*Air Toxics*

Investigate major and area sources subject to NESHAPs - N, R, H

*Data Quality*

Ensure all compliance/emissions data is complete and accurate for Agency & public access (i.e., facility universes, classifications, inspections, compliance status, enforcement actions, HPV's, etc) - N, R, H

**FINAL Vermont PPA Priorities & Commitments List - Jun 27, 2005 EPA Contacts**

Respond in a timely manner to error corrections (Error Tracker/ECHO) - N, R, H

*Compliance Monitoring Strategy (The Compliance Monitoring Strategy (CMS) Policy was finalized in April 2001)*

- 1) Perform a full compliance inspection of Title V sources once every 2 years (This includes on-site or off-site inspections for certain types of facilities with comprehensive self-monitoring/reporting. Note: on-site inspections must occur once every 5 years.) ---(note: states can negotiate to extend inspection frequency on case-by-case or sector-by sector basis from 2 to 5 years) - N,R, H/N
- 2) Inspect Mega Facilities once every 3 years (Inspections of mega facilities are optional based on State/Local desire to split very large complexes into smaller sources and perform inspections over 3 years.) - N, R, H/N
- 3) Inspect very large synthetic minors (>=80% major threshold) once every 5 years - N, R, H
- 4) Investigations - N, R, H/N
- 5) Review all Title V required reports annually (Title V reports include: Annual Compliance Certifications; Semi-annual deviation reports; CEM/COM/Parameter EER reports; Prompt Reporting reports, etc.) - N, R, H

*HPV*

Identify HPV's in accordance with the HPV policy (note: states need to provide EPA with watch-list answer codes quarterly) - N, R, H

*Asbestos Demo/Reno - N, H*

**RCRA: N=National Priority, R=Regional Priority, H=High Relative Priority, M=Medium Priority, L=Low Priority, N=Negotiable**

TSDf's- Inspect 100% of Commercial TSDf's Annually, 50% of Other TSDf's - R, N, H

Financial Assurance Record Reviews - R, N, H

LQG's- Inspect 20%\* of universe (\* 20% LQG coverage rate) - R, N, N

SQG's - Never Inspected - R, N, M

Tips/Complaints\* (\* Tips/Complaint investigations Off-set Inspections)- R, N, H

DPW's/Municipalities - R, M, N

Colleges and Universities - R, M, N

Public Agencies - R, L, N

Boat Building/Marinas - R, M, N

Auto Crushers - R, L

Hazardous Waste Exports - R, N, H, N

Cement Manufacturers (Sand & Gravel) (\* Primarily sampling inspections for pH) - R, M

Illegal Operators- Inspect for sham recycling, foundries, improper dilution to avoid regulation, improper regulatory exclusions, etc. - R, N, H, N

Habitual Violators - R, N, H

SNCs- Report to RCRIS and take timely and appropriate action - R, N, H

**TSCA PCB- (CT, ME, NH): N=National Priority, R=Regional Priority, H=High Relative Priority, N=Negotiable**

“Use” violations - R, N

Investigate PCB spill situations - R, N

**TSCA Lead- (ME): N=National Priority, R=Regional Priority, H=High Relative Priority, N=Negotiable**

**Commitments List - Jun 27, 2005**

**EPA Contacts**

EPA - R, N  
 ty, R=Regional Priority, H=High Relative Priority, N=Negotiable

ional Priority, R=Regional Priority, H=High Relative Priority,

**UTION PREVENTION PROGRAMS: N=National Priority,  
 Priority, N=Negotiable**

y; Pharmaceutical Waste - R, N, N

ogy - R,N, N

N, N

e (Arsenic) - R, N, N

s - R, N, H

ors Assistance - R, N, N

t, N, N

l

; Measurement & Regional Coordination - R, N, H

/, Priority Chemicals, Beneficial Reuse, E-Waste - R, N, H

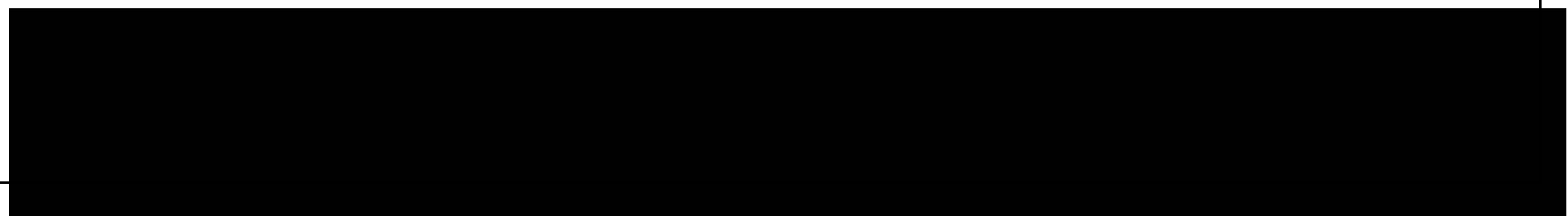
n - R, N, N

ort for Regional Innovations Workgroup - R, N, H

iology To Regional Problems - R, N, N

**earch**

ie spirit of the PPA. In keeping with this spirit the Region will work with d demands on the states. To address new, very high priority issues that included as part of this process permitting the Regional Office and/or ; to the PPA.	Manager: Robert Goetzl 617-918-1671, Tech: Deborah Harstedt 617-918-1085
ting progress and accomplishments under the workplan must be i. The process must be based on a negotiated schedule.	Manager: Robert Goetzl 617-918-1671, Tech: Deborah Harstedt 617-918-1085
e submitted within 90 days after the end of the annual grant period.	Manager: Robert Goetzl 617-918-1671, Tech: Deborah Harstedt 617-918-1085



2006	FINAL Vermont PPA Priorities & Commitments List - Jun 27, 2005	EPA Contacts
NE 1	Continue to implement the State Quality Management Plan (QMP) and submit an annual update letter to the EPA-NE Quality Assurance Unit documenting progress over the year and any changes made to the QMP.	Manager: Gerry Sotolongo 617-918-8311, Tech: Moira Lataille 617-918-8635
NE 2	Submit, to EPA-NE Quality Assurance Unit, an updated annual list of new and active approved Quality Assurance Project Plans (QAPPs), including Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs.	Manager: Gerry Sotolongo 617-918-8311, Tech: Alan Peterson 617-918-8322



Jeffrey Wennberg,

Commissioner Department of Environmental Conservation

103 South Main Street Waterbury, VT 05676

Dear Commissioner Wennberg:

The New England states, working in partnership with EPA-New England, pioneered the development of some of the first Performance Partnership Agreements (PPAs) in the country. These PPAs were guided by the principles set forth in the National Environmental Performance Partnership System (NEPPS). These include a joint commitment to work as partners to build trust and cooperation, to manage our collective resources to meet the highest environmental needs, to capitalize on each agency's strengths and expertise, and to communicate openly and frequently.

As you know, EPA issued comprehensive national guidance for all media programs this past April. At EPA-New England we are committed to continuing to improve our PPAs and to work with our states to better align environmental priorities. Towards that end, we are adopting a new approach to provide more specific and timely information to the environmental Commissioners about what EPA wants to have addressed in our PPAs.

EPA-New England has developed the enclosed *Priorities and Commitments List* to communicate the most important requirements and areas of emphasis for a substantial number of EPA programs covered under the PPA. In addition to the *Priorities and Commitments List*, I am also enclosing supplementary documents: a table showing Permit Integrity Profile Action Items for Vermont and Criteria for 106 Supplemental Funds for Monitoring Program Development. These enclosures, together with EPA's national program guidance, represent what is needed for Vermont to develop the annual update of the fiscal year 2004-2006 PPA. Please note we are requesting a written update of the state's commitments at the beginning of each year of the PPA agreement. These updates do not need to be lengthy but are particularly important now that the PPA staff and managers are more dispersed throughout EPA. We hope that our new approach will help EPA and the New England states achieve our mutual goal of having approved PPA updates and award-ready Performance Partnership Grants (PPGs) by the beginning of the Federal fiscal year which starts October 1st.

The *Priorities and Commitments List* highlights areas of emphasis for the PPA, but it does not include all the requirements that Vermont must address. There may be other important elements in the national program guidance such as core program requirements that must also be included in the PPA or addressed through other mechanisms (e.g., through supplemental work plans, participation in national databases, etc.).

The EPA regulation governing PPAs also requires that EPA and the states develop a

process for joint evaluation, and that a description of the evaluation process and a reporting schedule, including a required annual report, be included in the work plan. Gerald Potamis, EPA's Vermont State Director, has responsibility for managing the overall PPA and PPG processes for your State. Gerald Potamis will work with you to develop the required evaluation process and reporting schedule, and will also oversee the PPA negotiations. Specific grant commitments, however, should be negotiated by the managers responsible for the specific media programs within our respective offices.

I remain committed to EPA-State Performance Partnerships. I look forward to improving the grant negotiation process so we can use our resources effectively and efficiently to address the highest environmental priorities. Please do not hesitate to contact me or Gerald Potamis at (617) 918-1851 if you have any questions or suggestions.

Sincerely,

Robert W. Varney Regional Administrator

Enclosures

**Permitting for Environmental Results**

**Reporting Form for Water Program Actions**

EPA Region: **Region I** States: **Vermont 6/29/05 Program Category**

<b>Action Item</b>	<b>Program Category</b>	<b>Milestone Date</b>	<b>Completion Date</b>
<p>1. #1204 - CSOs: Not all permittees have NMCs or LTCPs required/ developed. All of Vermont's CSO communities have done considerable work to abate CSO discharges. Many of the Communities have small combined sewer systems where separation work has already been completed. The Region will work with Vermont during FY06 to evaluate the status of CSO abatement work in all CSO communities, to define procedures for verifying compliance with Vermont's water quality standards, and to determine what actions, if any, are necessary to address any outstanding issues identified through the review process (FY07).</p>	<p>(3) CSOs/SSOs</p>	<p>Region- Determine status, etc September  30, 2006</p>	<p>Region/VT Resolve Identified Issues  September 30, 2007</p>
<p>2. ID # 1065 - Data Management: Periodically, data errors appear in PCS due to problems with electronic data transfers from Vermont resulting in inaccurate SNC reports. Vermont has adapted its data management system which should help reduce late data transfers which in the past have led to inaccurate SNC reports. The Region currently enters all of Vermont's permit information and inspections into PCS. Measurement information is batch entered. The Region has advised Vermont that it will cease entering WENDB information into PCS on behalf of Vermont when Vermont is scheduled to transition into ICIS. The Region will work with Vermont staff to assure that this transition occurs in an orderly fashion.</p>	<p>(4) Data Management</p>		<p>FY06 and FY07</p>

<p>3. ID #86 - Permit Quality: Vermont's current NPDES application requirements do not require applicants for municipal NPDES permits to provide effluent monitoring data with the application. Instead Vermont requires municipal permittees to provide effluent monitoring data as part of permit effluent monitoring requirements such that the required information is available at the time of permit re-application. The Region will work with Vermont to ensure that Vermont's application requirements for NPDES permits are consistent with the federal NPDES application requirements found at title 40 of the Code of Federal Regulations (CFR), section 122.21.</p>	<p>(8) Permit Quality</p>		<p>September 30 2006</p>
<p>4. #96 - Storm Water: Vermont has yet to issue the storm water general permits for industrial activities and small site construction. Vermont expects to issue the permits during early FY06.</p>	<p>(12) Storm Water</p>		<p>Vermont January 1, 2006</p>
<p>5. ID #88 - WET: Limited amount of WET monitoring data are required to assess WET reasonable potential which established whether limits are warranted. For certain types of discharges the limited amount of WET monitoring data make it difficult to conduct WET reasonable potential determinations. The Region will complete an assessment of Vermont's current WET policies (FY06) and will work with Vermont to resolve any identified issues (FY07).</p>	<p>(14) WET</p>	<p>Regional assessment- June 30, 2006</p>	<p>Resolve issues September 30, 2007</p>
<p>6. ID#887 - CAFOs: Vermont does not expect to have its CAFO legal authorities revised by June 2005. Vermont has legislation pending to provide the necessary legal authorities for the Agency of Natural Resources (ANR) to develop and issue general permits for CAFOs (FY07).</p>			<p>Vermont September 30, 2007</p>
<p>7. ID#73 - CAFOs: See item 6 above. Vermont ANR will issue a general permit consistent with EPA requirements to cover CAFOs. The Region will work with Vermont to track progress (FY05, 06 and 07).</p>		<p>Region Track progress FY05,06 and 07.</p>	<p>Vermont September 30, 2007</p>

8. ID#1110 - Monitoring: The Region expects to			Vermont
receive Vermont's final monitoring strategy by September 30, 2005.			December 31, 2005

From the list provided below, please indicate which NPDES program category the corrective action will address.

- 1. 1. CAFOs 6. Monitoring 11. Standards
- 2. 2. Compliance Monitoring 7. Permit Issuance (incl. backlog) 12. Storm water
- 3. 3. CSOs/SSOs 8. Permit Quality 13. TMDLs
- 4. 4. Data Management 9. Pretreatment 14. WET
- 5. 5. Enforcement 10. Program Administration 15. Other

EPA Contact: **Roger Janson (617) 918-1621, janson.roger@epa.gov**

*EPA Headquarters Use*

Document #:  
Date Rec'd:  
Date entered into computer:

## **2005 §106 Supplemental Funds for Monitoring Program Development Proposed Criteria for Award Final 5/25/05**

OEME hopes this will be a first of succeeding allocations of funds directed toward strengthening state monitoring and assessment programs. As such, OEME believes it is in the interest of each state to focus on needs now that are important parts of the basic infrastructure of any state's enhanced program. Therefore, EPA places a high priority on these funds being used for the following (in order of significance):

1. 1. Completing data system implementation and maintenance for ADB and STORET
2. 2. Biomonitoring program implementation and sustainability
3. 3. Expanding coverage of monitored waters and water quality criteria
4. 4. Georeferencing waters to NHD (1:100,000 or finer resolution)

### **For States**

Prior to allocation of funds, each state must meet the following conditions:

1. 1. Submit to EPA a complete draft of the comprehensive water monitoring and assessment strategy, with final due September 20, 2005.
2. 2. In the strategy, identify high priority needs, with an associated cost and strategy for meeting these needs.
3. 3. Provide a brief work plan explaining how the supplemental funding will be used, taking into consideration EPA's priorities listed above, and what will be the tangible outcome(s) that indicates progress in implementation of the state's comprehensive strategy.

### **For NEIWPCC**

Prior to allocation of funds, NEIWPCC must meet the following conditions:

1. 1. Provide the results of a survey of state water monitoring program needs, for which the states indicate how NEIWPCC can provide support toward achieving monitoring program goals, in accordance with their monitoring strategies.
2. 2. Identify top priorities for which NEIWPCC expects it would be able to meet states needs, taking into consideration EPA New England's recommendations for states, as itemized above.
3. 3. Provide a work plan indicating how the funds will be used to support states, and what the tangible outcomes will be as a result of the funding.

### **Questions and Answers**

#### **How is the *Priorities and Commitments List* organized?**

This document is a PDF of an Excel spreadsheet. It is organized by EPA's Strategic Plan

Goals, Objectives and Sub-objectives. These goals are reflected by various colored bars on the left of the document. Entries listed as “NE” apply to all New England states. To view the “priorities and commitments” listed by Goal scroll down the document. EPA contacts are listed on the right side of the spreadsheet.

**Why did EPA New England develop the *Priorities and Commitments List* process?**

EPA New England developed this process to provide a consistent and clear approach to communicating to the states the most important priorities and commitments, from EPA’s perspective, that need to be included in the Performance Partnership Agreement negotiations. Previously EPA New England had approached each state negotiation process differently.

The *Priorities and Commitments List* does not include everything a state needs to do. There may be other important elements in the national program guidance such as core program requirements that must also be included in the PPA or addressed through other mechanisms (e.g., through supplemental work plans, participation in national databases, etc.) To develop this list each EPA New England program or goal lead was asked to submit the most important priorities and commitments to be negotiated for each New England state.

**Will the *Priorities and Commitments List* be reissued annually? If so, how will that impact multi-year PPA's?**

The *Priorities and Commitments List* will be produced annually in this format. It will serve as the kick-off document for a new PPA or an annual update to the PPA that is in mid-cycle. It will be produced after the final national program guidance has been issued and the states have had a chance to comment on it.

**What about emerging new work requiring state action that was not initially identified as priority work in the PPA?**

EPA New England will strive to honor the spirit of the PPA. In keeping with this spirit we will work with EPA HQ to limit the impact of unexpected demands on the states. To address new, very high priority issues that might emerge a re-opener clause will be included as part of this process permitting the Regional Office and/or the state to introduce necessary changes to the PPA.

**Does the list include activities from all offices within EPA New England, or only those that have PPA funded programs ?**

The list does include EPA New England priorities/initiatives (for example: EJ) and depending on the state, it may include issues related to program coordination and integration, in addition to those programs funded through the PPA.

**Does this list address accountability for environmental results and deliverables?**

Yes. A clear list of priorities and commitments can set the stage for improved accountability. The goal lead, or program manager entering information will have the option of also listing Program Activity Measures (PAMs) or environmental measures. The list is organized by goal and in this way it will attempt to foster the achievement of environmental results.

**Will this approach better inoculate PPAs from grant vulnerability assessments?**

Yes. The goal-oriented structure of the list will demonstrate our commitment to align the PPA's with National and regional goals. Creating annual workplans based on clear expectations, should also help. Adhering to a similar timeframe, an evaluation process, and existing reporting requirements should keep EPA in line with grant requirements.

**Acronym's in the PPA Priorities and Commitments List**

**AQS** - Air Quality System **BART**– Best Available Retrofit Technology **CAA** – Clean Air Act **CAFO** – Combined Animal Feeding Operation **CAIR** - Clean Air Interstate Rule **CALM** – Consolidated Assessment and Listing Methodology **CCMP** – Comprehensive Conservation and Management Plan **CEM/COM Parameter EER reports** – Continuous Emissions Monitoring/Continuous Opacity Monitoring, Excess Emissions Report **CO** -Carbon Monoxide **CSO** – Combined Sewer Overflow **DMR** – Discharge Monitoring Report **DPW** – Department of Public Works **DV**- Data Verification **ECHO** – Enforcement and Compliance History online **EJ** – Environmental Justice **EPA NE**- Environmental Protection Agency – New England **EQIP** – Environmental Quality Incentive Program **FIFRA** – Federal Insecticide, Fungicide, and Rodenticide Act **GRTS**- Grants Reporting and Tracking System **GWUDI** – Ground Water Under Direct Influence of surface water **HPV** – High production volume chemicals **HQ** – Headquarters **ICIS** – Integrated Compliance Information System **I/M** – Inspection/Maintenance **LCR** – Lead and Copper Rule **LOG** – Large Quantity Generator **LT 2** – Long Term 2 Enhanced Surface Water Treatment Rule **LTCP**- Long Term Control Plan **LUST** – Leaking Underground Storage Tank **MACT** – Maximum Available Control Technology **MANE VU**- Mid-Atlantic Visibility Union **MS4** – Municipal Separate Storm Sewer System **NAAQS** – National Ambient Air Quality Standards **NAMS/SLAMS** – National Air Monitoring Stations/State and Local Air Monitoring Stations **NDA** - No Discharge Area **NEAEB** – New England Association of Environmental Biologists **NEBAWWG** – New England Biological Assessment of Wetlands Work Group **NEG/ECP** – New England Governors and Eastern Canadian Premiers **NELAP** – New England Lakes and Ponds **NHD** - National Hydrography Dataset **NMC** – Nine Minimum Controls **NMFS** - National Marine Fisheries Service **NPDES** – National Pollutant Discharge Elimination System **NPS** - Non-point source **NSR** – New Source Review **OECA** – Office of Compliance Assistance **OEP** - Office of Environmental Protection **OES** – Office of Environmental Stewardship **OTC** - Ozone Transport Commission **PART** – Program Assessment and Rating Tool **PCB**- Polychlorinated biphenyls **PCI** – Pretreatment Compliance Inspection **PM** – Particulate Matter **PPA** – Performance Partnership Agreement **PPG** – Performance Partnership Grant **QAPP** - Quality Assurance Project Plan **QMP** – Quality Management Plan **RACT** – Reasonably Available Control Technology **RCC** – Resource Conservation Challenge **RCRA** – Resource Conservation and Recovery Act **RCRIS** – Resource Conservation and Recovery Information System **REMAP**- Regional Environmental Monitoring and Assessment Program **SDWIS** – Safe Drinking Water Information System **SIP** – State Implementation Plan **SIU** – Significant Industrial User **SNC** – Significant Non-Compliance **SQG** – Small Quantity Generator **SSO** – Sanitary Sewer Overflow **STORET**-STORage and RETreival system **SWTR** – Surface Water Treatment Rule **TCR** – Total Coliform Rule **TMDL** - Total Maximum Daily Load

**TSCA** - Toxic Substances Control Act **TSDF** – Treatment, Storage and Disposal Facility **UIC** – Underground Injection Control **UST** – Underground Storage Tank **VOC** – Volatile organic compounds **WQS** - Water Quality Standards