

Performance Partnership Agreement for Federal Fiscal Years 2016 - 2019

Between the Vermont Department of Environmental Conservation

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and the

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The Vermont Department of Environmental Conservation
and the
U.S. Environmental Protection Agency, Region I - New England

June 2017

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Execution of Agreement

This Performance Partnership Agreement (Agreement or PPA) between the Vermont Department of Environmental Conservation (VTDEC) and the U.S. Environmental Protection Agency, Region I - New England (EPA), covers the 4-year time period from October 1, 2015 to September 30, 2019. It is consistent with the principles embodied in the U.S. Environmental Protection Agency and the Environmental Council of the States joint agreement to develop an effective National Environmental Performance Partnership System (NEPPS).

By entering into this Agreement, both agencies commit to: 1) improving communications using agreed upon outcomes and environmental measures; 2) aligning and integrating both agency's goals objectives, and targets; 3) investing resources on the identified Areas for Collaboration; and 4) ensuring that limited staff and financial resources are used judiciously to address the most significant environmental and programmatic issues in the state and region.

The undersigned execute this Agreement between the VTDEC and the EPA for federal fiscal years 2016 - 2019. The Agreement, including the Areas for Collaboration, will be reviewed annually (as will the associated EPA Priorities & Commitments) and modified as necessary to ensure that it remains relevant and up-to-date.

Parties to the Agreement

The parties to the agreement will be the EPA and VTDEC. VTDEC will provide the major block of resources necessary to carry out the agreement. EPA will provide resources to manage the agreement and the Performance Partnership Grant (PPG) from the federal point of view. It is anticipated that the agreement will provide the opportunity for VTDEC and EPA to work more closely and cooperatively together in addressing the goals established in the P&C List. This PPA is intended to be a working document. It may be amended by mutual consent, as necessary, to ensure that it remains relevant, up-to-date, and reflective of any significant changes



Emily Boedecker
Commissioner

This, the 15 day of June, 2017.



Deborah A. Szaro
Acting Regional Administrator

This, the 15th day of June, 2017.

Overview of Performance Partnership Agreement

Goals, Roles & Contributions

The Vermont Department of Environmental Conservation (VTDEC) has entered into Performance Partnership Agreements (PPA) with the Environmental Protection Agency, Region I - New England (EPA) since federal fiscal year 1997. This agreement continues this process which serves as the workplan for grants from EPA to the state covering a portion of the cost of operating VTDEC's programs, as well as pass-through funds for other related projects. The development of the combined grants simplifies grant administration, provides the opportunity to prioritize the use of these funds as set forth in the PPA, and allows for fewer state and federal resources devoted to grant oversight, reporting, and administration.

This agreement covers a four-year period for federal fiscal years 2016, 2017, 2018 and 2019. Beginning in fiscal year 2016, the term of the Performance Partnership Grant (PPG) and the PPA have been synced and are both on the same four-year cycle. In addition, the EPA/Vermont Priorities and Commitment List (P&C List), has been changed from renegotiating annually to renegotiating every two years with the opportunity to reopen during the second year for any necessary adjustments. The most recent P&C List for federal fiscal years (FFY) 2016 and 2017, which includes FFY 2017 Reopeners, is included in Appendix A.

In recent years, EPA New England has broadened their approach in working with New England states to be a more collaborative partnership effort where EPA and the States pool their expertise, resources to work together to protect the environment and public health. Beginning in 2014, EPA has allowed for increased flexibility in state's commitments to assist states in addressing budget shortfalls, staffing challenges and emerging state priorities. The annual investment/disinvestment process has allowed Vermont the flexibility to amend commitments under the PPA to reflect priority investments in the most critical environmental areas.

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, DEC will provide EPA with two reports each year to document progress for items on the P&C List: a mid-year report and an end-of-year report. The mid-year report will focus on those activities and performance measures where satisfactory progress has not been made and will include proposed changes needed to address these exceptions. The end-of-year report will be submitted by January following the end of the federal fiscal year (September 30th). This report will summarize progress and discuss any areas where the department has failed to meet the established indicators or is experiencing difficulties in making the progress anticipated. During the year, EPA's Grant Manager and DEC's representatives will communicate at least monthly regarding any areas of concern that have been raised by their respective staffs and/or to discuss issues that could affect the agreement.

Staff level workgroups may be formed, as needed, covering areas of EPA assistance to the state on defined issues.

This reporting is intended to meet the requirements under 40 CFR Part 35 for a joint evaluation process for state grants, including PPGs. The elements are:

- (1) A discussion of accomplishments as measured against work plan commitments;
- (2) A discussion of the cumulative effectiveness of the work performed under all work plan components;
- (3) A discussion of existing and potential problem areas; and
- (4) Suggestions for improvement, including, where feasible, schedules for making improvements.

Further, if needed, VTDEC and EPA will convene a PPA meeting to discuss any issues that have arisen as part of this review process.

The department will continue normal reporting of data to national databases such as PCS-ICIS and SDWIS, as well as required program reporting such as 305(b) and enforcement related actions.

Schedule of Reporting Dates & Milestones:

<i>DATE:</i>	<i>MILESTONE:</i>
December 31, 2017	Submit End-of-Year report for FFY 2017.
June, 2018	Begin discussion with EPA and Stakeholders for the 2016–2019 PPA.
September, 2018	Submit Draft 2016–2019 PPA to EPA for review.
January, 2019	Submit End-of-Year report for FFY 2018
January, 2020	Submit End-of-Year report for FFY 2019

VT DEC & EPA Region 1 Strategic Plans

VTDEC Strategic Plan (2016-2018)

In January of 2016 VTDEC released their FY16-FY18 Strategic Plan. The plan is streamlined from previous strategic plans and focuses on measurable results, specifically on key performance measures and high level environmental indicators to measure how well all our combined efforts are improving the environment and quality of life for Vermonters. The plan focuses on four major outcomes as follows with an eye towards results-based accountability: clean air, clean water, healthy and safe communities and efficient and effective government. The full version of VTDEC’s strategic plan is included in Appendix B.

EPA Strategic Plan (2014-2018)

EPA’s strategic plan outlines five strategic goals for advancing EPA’s environmental and human health mission outcomes, as well as, five cross-cutting fundamental strategies. The cross-cutting strategies set expectations for changing the way EPA approaches its work. The strategies are geared to inform the work of all the EPA programs and to help meet the environmental challenges faced at this time. A synopsis of EPA’s strategic plan is included in Appendix C, the full plan is available at: www.epa.gov/planandbudget/strategicplan.html.

Common Themes in Strategic Planning

EPA and VTDEC share common goals for environmental and public health protection (Table 1). The differences in the plans are specifically how each organization’s plans to move towards achieving these common goals. VT DEC’s plan incorporates many state driven policies and priorities and, although these objectives and milestones don’t mirror those in EPA’s plan, both planning tools will result in many of the same shared outcomes and goals.

Table 1: *Side by side comparison of environmental and public health goals from EPA and VTDEC Strategic Plans*

VT DEC Strategic Plan (2016-2018)	US EPA Strategic Plan (2014 – 2018)
<i>3-year plan (July 2016 – June 2018)</i>	<i>4-year plan (October 2014 – September 2018)</i>
Goal 1: Reduced public health exposure and risk from air and climate pollution	Goal 1: Addressing Climate Change and Improving Air Quality
Goal 2: All Vermonters have safe drinking water	Goal 2: Protecting America’s Waters
Goal 3: Materials are sustainably managed and properties returned to productive use	Goal 3: Cleaning Up Communities and Advancing Sustainable Development
Goal 4: Protect, maintain, enhance and restore Vermont’s surface waters	Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution

Goal 5: Manage infrastructure to protect the health and safety of Vermonters	Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance
Goal 6: Develop and maintain a culture of continuous process improvement	Cross Agency Strategy 4: Embracing EPA as a High-Performing Organization

Environmental Equity/Justice in Vermont

The *Vermont* Department of *Environmental* Conservation (VT DEC) through the FFY 2016 – 2019 Performance Partnership Agreement (PPA), continues to ensure that environmental justice is an integral consideration in the development and implementation of all our programs.

Vermont is committed to the fair treatment of all of its citizens. Chapter 1 of Vermont’s constitution of 1777 constitution, a "Declaration of the Rights of the Inhabitants of the State of Vermont." This chapter was composed of 19 articles guaranteeing various civil and political rights in Vermont. The first article declared that "all men are born equally free and independent, and have certain natural, inherent and unalienable rights, amongst which are the enjoying and defending life and liberty; acquiring, possessing and protecting property, and pursuing and obtaining happiness and safety," echoing the famous phrases in the Declaration of Independence that declared that "all men are created equal" and possess "inalienable rights," including "life, liberty and the pursuit of happiness." The article went on to declare that because of these principles, "no male person, born in this country, or brought from over sea, ought to be holden by law, to serve any person, as a servant, slave or apprentice, after he arrives to the age of twenty-one Years, nor female, in like manner, after she arrives to the age of eighteen years, unless they are bound by their own consent." While this was the first such partial ban on slavery in the New World, it was not strongly enforced and slavery in the state persisted for at least another sixty years.

Article 7 states that the government shall be instituted for the common benefit of the people and for the peoples' defense and security. No one person, family, or group is to be singled out for more benefits of government over any other. The people have ultimate control of the government, and have an absolute right to change it in any way decided by the community.

It is these laws that lead VT DEC to establish Environmental Justice (EE/EJ) policies. There are three fundamental Environmental Justice principles: (1) To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations. (2) To ensure the full and fair participation by all potentially affected communities in the decision-making process. (3) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

The above statements guide the Environmental Equity/Environmental Justice (EE/EJ) work that we do. There is a growing body of evidence that suggests that, in certain instances around the

country, minority and lower income citizens or neighborhoods or communities have faced an inequitable share of the risks associated with environmental hazards. The core issue is the fairness in siting, monitoring, and/or clean-up of facilities and the regulation of activities that represent environmental hazards. The documentation on this issue suggests that for a variety of reasons, not necessarily discriminatory by intent, minority and lower income populations have sometimes borne a disproportionate share of the risks from activities which cause air, water, or soil pollution.

Much of our EE/EJ community considerations are based on communities that are socially-and economically-vulnerable. VT DEC fully acknowledges that Vermont's demographics are changing. The State's minority populations are mostly integrated into our larger municipalities and do not represent a significant at-risk demographic. In some of the State's rural communities, there are populations that are economically- and socially-vulnerable. EE/EJ considerations are addressed by looking at state economic data and by using the Environmental Protection Agency's EJ data. VT DEC also holds public information meetings so that residents can better understand proposed permits or modifications to permits.

Supporting Disadvantaged Communities

EPA and VT DEC also share a common goal to advance environmental justice. The agencies support the principle that all people have a right to be protected from environmental pollution, and to live in and enjoy a clean and healthy environment regardless of race, income, national origin or English language proficiency. In some of the State's rural communities, there are populations that are economically disadvantaged. In order to ensure safe drinking water to all Vermont's citizens, VT DEC has provided special considerations for disadvantaged communities in their Drinking Water Revolving Fund Program. VT DEC provides loan forgiveness for water infrastructure project principals, and for planning loans such as funds used to develop and implement an asset management plan. Forgiveness eligibility is based on affordability which considers income as a predictor of a household's ability to pay. For purposes of determining loan forgiveness, the Drinking Water State Revolving Fund (SRF) Program provides affordability criteria which uses a comparison of state community median household income to the median household income of the water system or town (s) in which the system exists. VT DEC's 2016 and 2017 Intended Use Plans for priority project SRF funding, provides for principal loan forgiveness for a number of municipal water systems.

Key Project Areas:

1. EJ 2020 – Work with Region I and the entire Agency to help EPA and VT DEC to integrate environmental justice into everything they do, cultivate strong partnerships to improve on-the-ground results, and chart a path forward for achieving better environmental outcomes and reducing disparities in the nation's most overburdened communities.
2. EJSCREEN – Where appropriate, use EPA's new environmental justice (EJ) mapping and screening tool called EJSCREEN to help to identify target communities and issues.

3. Title VI and Limited English Proficiency – VT DEC will continue to ensure that it as well as its subrecipients comply with Title VI of the Civil Rights Act of 1964 as well as Executive Order 13166's Limited English Proficiency Requirements. (See LEP.gov and EPA's civil rights webpage for additional information).
4. Public Health - Reduce public health exposure and risk from air and climate pollution.
5. Hazardous Waste and Brownfields – Continue to work to ensure fairness in siting, monitoring, and/or clean-up of facilities and the regulation of activities that represent environmental hazards. The documentation on this issue suggests that for a variety of reasons, not necessarily discriminatory by intent, minority and lower income populations have sometimes borne a disproportionate share of the risks from activities which cause air, water, or soil pollution.

Joint Areas for Collaboration

As evident in the strategic governing documents for each organization, protecting and improving both air and water quality, cleaning up communities and fostering sustainable development are common priorities. There are a number of opportunities for joint collaboration, however, the following issues have been identified are both critical and timely for additional attention by VTDEC and EPA. The separate, but closely-related Priorities and Commitments Lists that will be developed under the authority of the over-arching PPA during FFY 2016-2019 will document in writing the specific work tasks associated with each of the following Areas for Collaboration:

Implementation of the Lake Champlain TMDL and the Vermont Clean Water Act

Lake Champlain, the nation's 6th largest naturally formed lake, is an important resource for Vermont and the northeast region. The Lake is a major economic driver for tourism and recreation, provides drinking water for one-third of Vermont's population and provides critical habitat for numerous aquatic organisms. Under the Federal Clean Water Act, Lake Champlain is considered "impaired". In response to the degrading condition of the Lake, in 2015 Vermont adopted the Vermont Clean Water Act, a new law targeting both regulatory and municipal solutions to restoring the water quality statewide. After many years of negotiations, in 2016, Vermont finalized its Vermont Lake Champlain Phosphorus TMDL Phase 1 Implementation Plan in September 2016, which includes detailed commitments to achieve phosphorus reductions." The health of Lake Champlain is a priority for both EPA and VTDEC, as such, flexibility may be warranted in VTDEC's commitments to dedicate more resources to this critical effort.

Response to emerging contaminants

Emerging contaminants are newly recognized contaminants entering the environment through municipal, agricultural and industrial sources. "Emerging contaminants" can be broadly defined as any synthetic or naturally occurring chemical or any microorganism that is not commonly monitored in the environment, but has the potential to enter the environment and cause known or suspected adverse ecological and (or) human health effects.

These new contaminants represent a shift from traditional regulation because instead of coming from one identifiable source, these chemicals are often dispersed through the environment through a variety

of domestic, commercial and industrial uses. Responding to the detection of emerging contaminants in the environment is problematic because often the detection methods, as well as the environmental and health standards, are not completely developed. In many cases there is also a lack of understanding on the background environmental monitoring, identifying sources fate and transport of these contaminants in air and water, and the potential health impacts for humans and other organisms.

In 2016, the contaminant Perfluorooctanoic Acid (PFOA) was detected in drinking water in several communities in Vermont. Collaboration and assistance will be extremely crucial as VTDEC and EPA work towards providing clean drinking water to these communities.

Aging drinking water and wastewater infrastructure

Much of the drinking water and wastewater infrastructure in Vermont is over half of a century old. Public drinking water treatment plants and associated underground piping need repair to ensure we provide clean and adequate quantities of drinking water. Wastewater infrastructure including treatment and conveyance systems need upgrades to meet requirements of federal and state regulations. The Drinking Water and Clean Water State Revolving Loan Programs have been a successful mechanism to assist communities in these areas. VTDEC has recently launched an effort to assist communities with the development of “financial asset management plans” which are aimed at helping them plan fiscally and programmatically to prepare for needed upgrades and reduce the potential for emergency, or crisis situations. We anticipate that through these asset management plans, VTDEC will gain information about how much capital investment will be required to bring Vermont’s infrastructure up to modern standards and will look to collaborate with EPA for potential funding solutions and support.

Supporting and promoting adequate funding clean up Superfund Sites and assist in Brownfields Redevelopment

There are a number of active Superfund Sites in Vermont requiring remediation and additional corrective actions, including the Jard chemical site in Bennington; Commerce Street in Williston; Pine Street Barge Canal in Burlington; several old municipal landfills that received industrial wastes; and former copper mine sites. Vermont’s Environmental Contingency Fund (ECF), which provides funding for the state’s share of superfund remediation and ongoing operation costs is chronically underfunded. Over the past several years VTDEC has been exploring options and proposed solutions to provide the much-needed revenue resources to this fund.

Vermont’s Brownfield Program encourages brownfield reuse projects as a means of accomplishing positive environmental and human health impacts while advancing sound land-use practices. Reutilization of historically productive properties supports sustainable development trends and promotes community and economic growth. Over the past two years federal funding for the Brownfield Program has decreased, unfortunately resulting in fewer assessments of contaminated properties in Vermont. Given that the Brownfield Program remains a top priority for VTDEC, our collaboration with EPA on these efforts are more critical than ever to not only sustain, but ensure forward success.

Grants Management

This Performance Partnership Agreement (PPA) covers federal fiscal years 2016 – 2019 (October 1, 2015 to September 30, 2019). The PPA, together with work plans (as represented by the associated P&C Lists), set forth the goals, sub-goals, objectives, programs, activities, deliverables, and measures of progress to address the full range of cooperative federal-state environmental programs under the Department’s jurisdiction. The Priorities and Commitments List (P&C List) in Appendix A, is structured under EPA’s five strategic plan goals: (1) Air and Climate Change; (2) Water; (3) RCRA; (4) Chemical Safety and (5) Enforcement and Compliance and includes another section of Cross-Media Administration. Activities included range from implementing new federal regulations such as the Ground Water Rule for public drinking water systems or total maximum daily loads (TMDLs) for impaired bodies of water, to completing inspections for wastewater treatment and underground storage tank (UST) facilities. The list also covers several reporting requirements such as reporting emissions for specific pollutants under the National Ambient Air Quality Standards (NAAQS). The Performance Partnership Grant (PPG) is a key vehicle for implementing the Agreement, in combination with other federal and state funding sources. The PPG currently combines the following federally-funded programs:

1. Water Pollution Control (CWA Section 106, surface and ground water)
2. Nonpoint Source Management (CWA Section 319)
3. Public Water System Supervision (SDWA Sections 1443(a) and 1451(a)(3))
4. Underground Water Source Protection (UIC) (SDWA Section 1443(b))
5. Resource Conservation & Recovery (RCRA) (SWDA Section 3011(a))
6. Underground Storage Tank Grant (UST) (SWDA Section 9010)
7. Clean Air Act Grant (CAA Section 105)

Note that the Leaking Underground Storage Tank (prevention and cleanup) are funded separately from the PPA. The following federal programs may be added to the PPG with a workplan separate from this PPA:

- Pollution Prevention Incentive Grant (PPIS) (PP Act Section 6605)
- Water Quality Program Development (CWA Section 104(b)(3))

VTDEC Budget Overview:

VTDEC’s project operating budget for state fiscal year 2017 (SFY2017) is \$76.7 million dollars and is comprised of the following revenue sources: \$8 million state general fund; \$29.7 million special funds (including fees), \$32 million federal funds, \$7 million interdepartmental funds. The SFY2017 budget increased from \$52 million in SFY2016 to \$76.7 million in SFY2017 in large part because the State of Vermont now legislatively appropriate the spending authority for the Clean

Water and Drinking Water State Revolving Loan Programs in the VTDEC annual operating base budget. This change in practice stemmed from a VTDEC business process improvement effort which resulted in more efficient and transparent administrative processing as well as more timely availability of future project funds.

Consistent with ***GPI 12-06, Timely Obligation, Award, and Expenditure of USEPA Grant Funds***, for multi-year awards, VTDEC should apply for the total amount of funds expected for the period covered by the award and include any required match in the application. The work plan should also cover the same time period. USEPA will fund the application incrementally as funds become available.

During the 2016 federal fiscal year, \$4,831,300 was awarded from the EPA to VTDEC through the PPG. This amount could change slightly for Federal fiscal years 17-19 because new one-time funds became available from EPA through the Multi-Purpose Grant Program award in FFY16. VTDEC receives several other grant awards annually from EPA which have a significant focus on pass-through related efforts. These grant awards include the Clean Water and Drinking Water State Revolving Loan Fund Programs, Lake Champlain Basin Program, Leaking Underground Storage Tank Program, and the Brownfields Response Program.

To be allowable under Federal awards, costs must meet the following general criteria, found in 2 CFR Part 200 Subpart E – Cost Principles:

- Be necessary and reasonable for proper and efficient performance and administration of Federal awards.
- Be allocable to the Federal award under the provisions of this part.
- Be authorized or not prohibited under State or local laws or regulations.
- Conform to any limitations or exclusions set forth in these principles, Federal laws, terms and conditions of the Federal award, or other governing regulations as to types or amounts of cost items.
- Be consistent with policies, regulations, and procedures that apply uniformly to both the Federal award and other activities of the governmental unit.
- Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- Except as otherwise provided for in this part, be determined in accordance with generally accepted accounting principles.
- Not be included as a cost or used to meet cost sharing or matching requirements of any other Federal award in either the current or a prior period, except as specifically provided by Federal law or regulation.
- Be the net of all applicable credits.
- Be adequately documented.

Federal Regulations and Key Policies

All categorical environmental state grants, including PPGs, are governed by 40 CFR Part 35, State and Local Assistance, Subpart A, Environmental Program Grants (commonly referred to as Part 35); and all state grants are subject to 40 CFR Part 31, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments; all grants and agreements are also subject to 2 CFR Part 200 and 2 CFR Part 1500 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. PPGs and PPAs do not supersede any laws, regulations, or delegation agreements.

Some environmental program grants are awarded through a competitive process. An applicant and the Regional Administrator may agree to add funds available for a competitive grant to a Performance Partnership Grant. If this is done, the work plan commitments that would have been included in the competitive grant must be included in the Performance Partnership Grant work plan. After the funds have been added to the Performance Partnership Grant, the recipient does not need to account for these funds in accordance with the funds' original environmental program source, but remains accountable for delivering on work plan commitments.

Programmatic requirements. In order to include funds from an environmental program grant listed in §35.101 of this subpart in a Performance Partnership Grant, applicants must meet the requirements for award of each of the environmental programs from which funds are combined in the agency's Performance Partnership Grant, except the requirements at §35.268(b) and (c), 35.272, and 35.298 (c), (d), (e), and (g). These requirements can be found in the CFR beginning at §35.140.

PPG work plans are subject to the same requirements as any other grant work plan. The requirements can be found at 40 CFR 35.107. An approvable work plan must specify the following:

- The work plan components to be funded under the grant;
- The estimated work years and the estimated funding amounts for each work plan component;
- The work plan commitments for each work plan component and a time frame for their accomplishment;
- A performance evaluation process and reporting schedule in accordance with 40 CFR 35.115; and
- The roles and responsibilities of the recipient and USEPA in carrying out the work plan commitments.

The work plan must also be consistent with applicable federal statutes, regulations, circulars, Executive Orders, and USEPA delegations, approvals, or authorizations. The PPA or portion thereof that serves as a grant work plan must meet the same work plan requirements as for any state program grant. The portion(s) of a PPA that serve as a work plan must be clearly identified and distinguished from the rest of the PPA. The regulation at 40 CFR 35.107(c) states:

“An applicant may use a Performance Partnership Agreement or a portion of a Performance Partnership Agreement as the work plan for an environmental program grant if the portions of the Performance Partnership Agreement that serve as all or part of the grant work plan: (1) Are clearly identified and distinguished from other portions of the Performance Partnership Agreement; and (2) Meet the requirements in §35.107(b). A PPG work plan should be the product of joint planning, priority setting and mutual agreement between the state and USEPA. The PPG grant work plan is the result of negotiations between USEPA and state program managers and staff. Successful PPG work plan negotiations rely on a predictable process that fosters prompt resolution of issues, including elevation of issues to senior management levels if necessary. In successful work plan negotiations USEPA and the state will reach a mutual understanding and agreement about what will be accomplished under the agreement.”

Opportunities for Grant Process Streamlining (GPI 12-06, Timely Obligation, Award, and Expenditure of USEPA Grant Funds):

- ***Estimating Budgets:*** Consistent with applicable National Program Managers (NPM) Guidance, USEPA should request States to develop and/or submit their work plans and applications based on the previous year’s award amount or the amount derived from the President’s budget, whichever is higher. If amounts based on the President’s budget are not known, negotiations should be based on the previous year’s award amount.
- ***Focus Negotiations on New Priorities:*** Assuming that the level of funding is not significantly different from the previous year’s grant amount, the primary focus of work plan negotiations should be on new priorities consistent with applicable NPM guidance. Less emphasis should be placed on negotiating recurring activities/commitments where there is a satisfactory record of grant performance.
- ***Multi-Year Grant Awards:*** For multi-year grant awards, applicants should apply for the total amount of funds expected for the period covered by the award and include any required match in the application. The work plan should also cover the same time period. USEPA will fund the application incrementally as funds become available.
- ***Pen and Ink Changes:*** If the final amount of funding is lower than the amount applied for, Regions will work with States to identify necessary changes. The State will not need to submit a revised work plan or new application. Regions will document and date through pen and ink changes/email correspondence, agreed-upon revisions to the work plan, budget narrative, and application forms.

Environmental Results (USEPA Order 5700.7A1, Environmental Results Under USEPA Assistance Grants)

USEPA Order 5700.7A1 directs program offices to ensure that the work plan contains well-defined outputs and outcomes. For state assistance agreements under 40 CFR 35, Subpart A, program offices may satisfy this requirement by ensuring compliance with 40 CFR 35.107 as stated above. Prior to approving an assistance agreement work plan, program offices must ensure that they can link the work plan to USEPA’s Strategic Plan architecture.

The term “output” in USEPA Order 5700.7A1 means an environmental activity, effort, and/or associated work product related to an environmental goal or objective that will be produced or provided over a period of time or by a specified date. Outputs may be quantitative or qualitative but must be measurable during an assistance agreement funding period.

The term “outcome” means the result, effect or consequence that will occur from carrying out an environmental program or activity that is related to an environmental or programmatic goal or objective. Outcomes may be environmental, behavioral, health-related or programmatic in nature, must be quantitative and may not necessarily be achievable within an assistance agreement funding period. Note: These terms and their uses are similarly defined in 40 CFR 35.102.

Annual Work Plan Development:

Each year, VTDEC will work with EPA to develop, edit and enhance the Priorities and Commitments List (P&C) which serves as the major work plan and documented list of required programmatic deliverables under our grant. As a new e-Enterprise initiative for FFY16, EPA developed a SharePoint Site which is used by states including VTDEC to negotiate and communicate “real time” by sharing documents on-line. This process was used to develop the new 2-year P&C List for FFY16 and FFY17. Under this approach, there is an expectation that the negotiated work plan commitments will cover a two-year period absent changed circumstances, as defined below. The benefits of this approach include minimizing/eliminating the need for extensive work plan negotiations at the mid-point of a two-year cycle, with recurring commitments from year one typically carrying over into year two. This new platform allows program staff in both organizations to communicate directly on developing the list of commitments under the PPA and related PPG. It is a dynamic tool that not only saves staff time collectively, but it also encourages stronger communication by making it easier to correspond on things such as suggesting edits, additions and deletions, where appropriate. Adjustments to year-two commitments will be necessary if there are changed circumstances such as changes in Administrator/NPM priorities, revisions required by USEPA’s Annual Commitment process, a substantial reduction or increase in USEPA funding, and similar issues experienced at the state levels.

Tracking and Evaluating Performance:

VTDEC uses several tools to track performance of our programs. First, VTDEC will submit an End of Year report each year to update EPA on the status of commitments on the P&C List. These reports are specified on Page 4. Second, VTDEC’s new strategic plan includes both environmental indicators as well as key performance measures, this document will be updated annually and shared with EPA. Finally, the State of Vermont General Assembly requires “Performance Based Budgets” be submitted annually. In support of annual state budget proposals, VTDEC develops a package of annual performance measures encompassing efforts from all of our environmental medias. Beginning in SFY2014, VTDEC launched an effort to

improve how the Department tracks and measures the performance of our programs using Results Based Accountability (RBA). This challenges programs to answer the three primary questions used within the RBA framework: (1) How much did we do? (2) How well did we do it? and (3) Is anyone better off? Performance accountability and RBA are now widely throughout VTDEC's program administration and management; efforts range from including performance measures in our pass-through agreements (grants and contracts), to incorporating RBA into our strategic planning and annual budget development. A full copy of this report for the SFY2017 budget is available at: <http://dec.vermont.gov/sites/dec/files/co/documents/DEC-FY17-Performance-Measures.pdf>

Improving Performance through Lean Business Process Improvement:

VT DEC adopted Lean as a process improvement methodology and management philosophy in an effort to build a system of continuous improvement with the goal of better servicing the Vermont public through more efficient, timely and transparent processes. This initiative includes the deployment of a "Lean" process improvement methodology along with modern information technology tools.

When the term "Lean" was coined in the late 90's, it was predominantly associated with manufacturing. However, over the years Lean has transformed from a manufacturing strategy to a business strategy used in slightly different forms within other sectors such as healthcare and government. The VTDEC, following the lead of other state and federal agencies, adopted Lean in concept back in February 2013. With support from the VT General Assembly, the Department was able to secure financial and personnel resources to establish a formal structure for coordinating and overseeing Department-wide Lean efforts through its Business Transformation Initiative (BTI). To date we have initiated over 30 process improvement projects and continue to enhance and expand our efforts not only within VTDEC, but more broadly with cross agency efforts within VT and collaborations with other states and associations. Details of VTDEC's Lean Program are available at: <http://dec.vermont.gov/administration-innovation/lean>.

APPENDIX A

2016-2017 Priorities and Commitments List, including Reopener

No.	RO (Reopener New, Reopener Revised)	FY 2016 PPA Priorities & Commitments List	FY 2017 PPA Priorities & Commitments List	Approval: Initials, Date		VT DEC Contacts 802.XXX.XXXX	EPA Contacts 617.918.XXXX	Item-Specific Reopener	FY2017 Reopener Comments	Approval: Initials, Date	
				VT DEC	EPA					VT DEC	EPA
				GOAL 1: ADDRESSING CLIMATE CHANGE AND IMPROVING AIR QUALITY						GOAL 1: ADDRESSING CLIMATE CHANGE AND IMPROVING AIR QUALITY	
		Objective 1.1: Address Climate Change	Objective 1.1: Address Climate Change								
		GHG Actions in the Industrial Sector	GHG Actions in the Industrial Sector				Senior Program Manager: Dave Conroy - 1661				
1		Participate in conference calls set up by EPA related to RGGI and EPA's final Clean Power Plan.		HH, 9/22/15	DBC 9/25/15	Megan O'Toole 249-9882	Manager: Cynthia Greene -1813, Shutsu Wong -1078			HH, 11/14/16	DBC - 11/21/16
2		Participate in any continuing roundtable discussions among wastewater treatment facility operators, and work with both EPA and Efficiency Vermont on follow up activities related to these roundtables.	Participate in any continuing roundtable discussions among wastewater treatment facility operators, and work with both EPA and Efficiency Vermont on follow up activities related to these roundtables.	EK; 12/10/15	DBC 9/28/15	David DiDomenico 490-6184 and Paul Markowitz, Efficiency Vermont	Manager: Cynthia Greene -1813, Tech: Jason Turgeon -1637				DBC - 11/21/16
3		As resources allow, work with EPA on the implementation of the Greenhouse Gas Reporting Rule. Activities may include: 1) reviewing a list of VT facilities that may be subject to reporting rule but did not report; 2) answering and/or directing questions from facilities on the rule.	As resources allow, work with EPA on the implementation of the Greenhouse Gas Reporting Rule. Activities may include: 1) reviewing a list of VT facilities that may be subject to reporting rule but did not report; 2) answering and/or directing questions from facilities on the rule.	DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Cynthia Greene -1813, Shutsu Wong -1078			HH, 11/14/16	DBC - 11/21/16
		Objective 1.2: Improve Air Quality	Objective 1.2: Improve Air Quality								
		Ozone, PM _{2.5} , PM ₁₀ and CO	Ozone, PM _{2.5} , PM ₁₀ and CO								
4		Continue participation in EPA's AIRNOW program. Submit real-time pollutant data and provide forecasts and alerts. By Dec 31, 2015, enable Twitter notification features of EnviroFlash. Attend R1 air quality outreach and forecasting workshop, tentatively planned for Fall 2015, either in person or remotely. (FY'16-17 OAR NPM Guidance: 2.1.4.3 NAAQS Other, Activity 1, and 2.4.4 Ambient Monitoring, Activity 11.)	Continue participation in EPA's AIRNOW program. Submit real-time pollutant data and provide forecasts and alerts. Attend R1 air quality outreach and forecasting workshop in 2017, if held, either in person or remotely. (FY'16-17 OAR NPM Guidance: 2.1.4.3 NAAQS Other, Activity 1, and 2.4.4 Ambient Monitoring, Activity 11.)	HH, 9/22/15	DBC 9/15/15	Dan Riley 272-3695 Robert Lacaille 272-3093	Manager: Anne Arnold - 1047, Tech: Anne McWilliams -1697			HH, 11/14/16	DBC - 11/21/16
5		Submit 2014 emissions data for all sectors to EPA's NEI by January 15, 2016. (FY16-17 OAR NPM Guidance: 2.1.4.3 NAAQS Other, Activity 5.)	Submit 2014 point source emissions data to EPA's NEI by December 31, 2016 for "Type B" sources. (FY16-17 OAR NPM Guidance: 2.1.4.3 NAAQS Other, Activity 8.)	HH, 9/22/15	DBC 9/25/15	Jeff Merrell 272-3656 Dan Riley 272-3695	Manager: Anne Arnold - 1047, Tech: Bob McConnell -1046			HH, 11/14/16	DBC - 11/21/16
6	RR	Work with EPA on annual update to 4-year SIP Plan and target date for updated plan is April 30, 2016.	Work with EPA on annual update to 4-year SIP Plan and target date for updated plan is April 30, 2017.	HH, 9/22/15	DBC 9/25/15	Bennet Leon 249-4221	Manager: Anne Arnold - 1047	EPA plans to send draft of updated SIP plan to the state in Nov 2016, with a target to finalize in Dec 2016.		HH, 11/14/16	DBC - 11/21/16
7		Adopt regulations, submit negative declarations, or issue permits addressing the following CTGs issued by EPA in 2006: (1) Industrial Cleaning Solvents, (2) Flat Wood Paneling Coatings, and (3) Offset Lithographic Printing & Letterpress Printing. Provide appropriate documentation to EPA.		DE 9/22/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Anne Arnold - 1047, Tech: Ariel Garcia - 1660			DE, 11/14/16	DBC - 11/21/16
8		Adopt regulations, submit negative declarations, or issue permits addressing the following CTGs issued by EPA in 2008: (1) Miscellaneous Metal Products and Plastic Parts Coatings; (2) Automobile and Light-Duty Truck Assembly Coatings; (3) Fiberglass Boat Manufacturing Materials; and, (4) Miscellaneous Industrial Adhesives. Provide appropriate documentation to EPA.		DE 9/22/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Anne Arnold - 1047, Tech: Ariel Garcia - 1660			DE, 11/14/16	DBC - 11/21/16
9		Submit RACT SIP for 2008 ozone standard. SIP is due two years after designation (July 20, 2014) as stated in the implementation rule.		DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Anne Arnold - 1047, Tech: Ariel Garcia - 1660			DE, 11/14/16	DBC - 11/21/16
10		Re-evaluate RACT for the two major source facilities which are affected by the 2006 Flat Wood Paneling Coatings CTG: (1) Churchill Coatings Corporation in North Springfield, and (2) HBH Holdings, LLC in East Arlington and issue revised permits to either reflect new RACT or restrict potential emissions to non-major source levels. Provide appropriate documentation to EPA that all applicable major sources are addressed.		DE 9/22/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Anne Arnold - 1047, Tech: Ariel Garcia - 1660			DE, 11/14/16	DBC - 11/21/16
11			Following implementation of an electronic data collection and management system for the Vermont I/M program, submit an I/M SIP Revision reflecting changes to the program.	HH, 9/22/15	DBC 9/15/15	Tom Moye 279-5327	Manager: Anne Arnold - 1047, Tech: Ariel Garcia - 1660			HH, 11/14/16	DBC - 11/21/16
12		If not completed in FY'15, submit an infrastructure SIP for the 2008 ozone standard in accordance with EPA guidance (including the "transport" element.) (FY'16-17 OAR NPM Guidance: 2.1.4.1 NAAQS SIPs, Activity 2.)		HH, 9/22/15	DBC 9/15/15	Bennet Leon 249-4221	Manager: Anne Arnold - 1047, Tech: Richard Burkhart -1664			HH, 11/14/16	DBC - 11/21/16
13	RR	Review state ozone data and EPA guidance to prepare state recommendations for area designations for the potentially revised ozone NAAQS. (FY'16-17 OAR NPM Guidance: 2.1.4.2 NAAQS Designations, Activity 1.)	Submit state recommendations for area designations for the potentially revised ozone NAAQS. Recommendations are due one year after EPA issues a revised NAAQS. (FY'16-17 OAR NPM Guidance: 2.1.4.2 NAAQS Designations, Activity 1.)	HH, 9/22/15	DBC 9/15/15	Bennet Leon 249-4221	Manager: Anne Arnold - 1047, Tech: Richard Burkhart -1664	Submit state recommendations for the 2015 ozone NAAQS by Oct 1, 2016 and respond to EPA's 120-day proposed designation letter, as appropriate.		HH, 11/14/16	DBC - 11/21/16
14	RR	Consider joining EPA's PM Advance for purposes of addressing emissions of wood smoke, and notify EPA of the state's decision by December 31, 2015. If participating, send sign-up letter to EPA by March 31, 2016. (FY'16-17 OAR NPM Guidance: 2.1.4.3 NAAQS Other, Activities 2 and 9.)	If participating in PM Advance, send "path forward" to EPA by December 31, 2016. (FY'16-17 OAR NPM Guidance: 2.1.4.3. NAAQS Other, Activities 2 and 9.)	HH, 9/22/15	DBC 9/15/15	Brian Woods 272-4496	Manager: Anne Arnold - 1047, Tech: Alison Simcox - 1684	Pursuant to Multipurpose Grant (MPG) workplan, provide support for VT's PM Advance Program including staff time to develop and implement program, outreach/education in selected mountain valley locations, including mobile rapid deployment PM _{2.5} monitor. Develop PM Advance Program plan, and 3-5 associated strategies to reduce wood smoke related PM _{2.5} emissions in selected mountain valley locations. Send path forward to EPA by March 31, 2017.		HH, 11/14/16	DBC - 11/21/16

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				VT DEC	EPA					VT DEC	EPA
				GOAL 1: ADDRESSING CLIMATE CHANGE AND IMPROVING AIR QUALITY						GOAL 1: ADDRESSING CLIMATE CHANGE AND IMPROVING AIR QUALITY	
15		Submit infrastructure SIP for the 2012 PM _{2.5} NAAQS. SIP is due December 2015. (FY'16-17 OAR NPM Guidance: 2.1.4.2 NAAQS SIPs, Activity 2.)		HH, 9/22/15	DBC 9/15/15	Bennet Leon 249-4221	Manager: Anne Arnold - 1047, Tech: Alison Simcox - 1684			HH, 11/14/16	DBC - 11/21/16
		<i>Pb, NO₂ and SO₂</i>	<i>Pb, NO₂ and SO₂</i>				Senior Program Manager: Dave Conroy - 1661				
16		If not completed in FY'15, submit infrastructure SIP for the one hour NO ₂ standard. (FY'16-17 OAR NPM Guidance: 2.1.4.1 SIPs, Activity 2)		HH, 9/22/15	DBC 9/15/15	Bennet Leon 249-4221	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			HH, 11/14/16	DBC - 11/21/16
17		If not completed in FY'15, submit infrastructure SIP for the one hour SO ₂ standard. (FY'16-17 OAR NPM Guidance: 2.1.4.1 SIPs, Activity 2)		HH, 9/22/15	DBC 9/15/15	Bennet Leon 249-4221	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			HH, 11/14/16	DBC - 11/21/16
18	RR		By January 13, 2017, submit a designation request in accordance with EPA rules and guidance, including the final SO ₂ Data Requirements Rule. (FY'16-17 OAR NPM Guidance: 2.1.4.1 SIPs, Activity 3.)	HH, 9/22/15	DBC 9/15/15	Contact TBD	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657	VT should respond to EPA's 120-day proposed SO ₂ designation letter, as appropriate.		HH, 11/14/16	DBC - 11/21/16
		<i>Regional Haze</i>	<i>Regional Haze</i>				Senior Program Manager: Dave Conroy - 1661				
19		If not completed in FY'15, submit the Regional Haze Interim Progress Report SIP revision due August 31, 2014. (FY'16 - 17 NPM Guidance: 2.2.4 Regional Haze, Activity 3.)		HH, 9/22/15	DBC 9/15/15	Bennet Leon 249-4221	Manager: Anne Arnold - 1047, Tech: Anne McWilliams -1697			HH, 11/14/16	DBC - 11/21/16
20		Provide input to EPA's Regional Haze Rule revisions and/or guidance for the second planning period. (FY'16 - 17 OAR NPM Guidance: 2.2.4 Regional Haze, Activity 4)	If the MANE-VU states plan on adhering to the current deadline of July 31, 2018 for submission of the next Regional Haze SIP, submit a draft Regional haze SIP for the second planning period by September 30, 2017.	HH, 9/22/15	DBC 9/15/15	Bennet Leon 249-4221	Manager: Anne Arnold - 1047, Tech: Anne McWilliams -1697			HH, 11/14/16	DBC - 11/21/16
		<i>Title V / NSR Permits</i>	<i>Title V / NSR Permits</i>				Senior Program Manager: Dave Conroy - 1661				
21		During FY'16, ensure that 100 percent of Title V significant modifications are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 1 and 2)	During FY'17, ensure that 100 percent of Title V significant modifications are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 1 and 2)	DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			DE, 11/14/16	DBC - 11/21/16
22		During FY'16, ensure that 100 percent of new Title V operating permits are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 1 and 2)	During FY'17, ensure that 100 percent of new Title V operating permits are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 1 and 2)	DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			DE, 11/14/16	DBC - 11/21/16
23		Title V renewals: Document the number of expired Title V permits as of Oct. 1, 2015 and reduce the total universe by 10% during the fiscal year. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 1 and 2)	Title V renewals: Document the number of expired Title V permits as of Oct. 1, 2016 and reduce the total universe by 10% during the fiscal year. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 1 and 2)	DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			DE, 11/14/16	DBC - 11/21/16
24		During FY'16, issue all major NSR permits within 12 months of receiving a complete permit application. Provide necessary data to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activity 4)	During FY'17, issue all major NSR permits within 12 months of receiving a complete permit application. Provide necessary data to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activity 4)	DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			DE, 11/14/16	DBC - 11/21/16
25		During FY'16, ensure that data are submitted to EPA's RACT, BACT, LAER Clearinghouse for new major sources and major modifications within 90 days of permit issuance. Provide the data documenting the timeliness of the submissions every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 5 and 6)	During FY'17, ensure that data are submitted to EPA's RACT, BACT, LAER Clearinghouse for new major sources and major modifications within 90 days of permit issuance. Provide the data documenting the timeliness of the submissions every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activities 5 and 6)	DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			DE, 11/14/16	DBC - 11/21/16
26		Participate with EPA in title V permit program evaluations, set targets to respond to EPA's evaluation report, and implement recommendations. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activity 3.)		DE 9/10/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			DE, 11/14/16	DBC - 11/21/16
27		Re-evaluate existing Vermont NSR rule language and revise agreed upon provisions in the interim as appropriate and establish a framework and timeline for more substantive revisions to achieve full approval. In the interim, ensure all Vermont major and minor source permits meet all substantive EPA permitting requirements.	Work with EPA to revised NSR rules meeting EPA requirements.	DE 9/22/2015	DBC 9/15/15	Doug Elliott 377-5939	Manager: Ida McDonnell -1653, Tech: Donald Dahl -1657			DE, 11/14/16	DBC - 11/21/16

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				VT DEC	EPA					VT DEC	EPA
				GOAL 1: ADDRESSING CLIMATE CHANGE AND IMPROVING AIR QUALITY							
		<i>Air Monitoring</i>	<i>Air Monitoring</i>					Senior Program Manager Katrina Kipp - 8309			
28		Air Monitoring Network: Submit to EPA by July 1, 2016 the annual air monitoring network plan (40 CFR 58.10). State Plan should be made available for public and EPA review by May 31, 2016 at the latest. The Plan should include ensuring monitoring networks are consistent with the requirements of recent NO ₂ , SO ₂ , CO, lead and ozone NAAQS rules, in particular. (OAQPS M08)(FY'16-17 OAR NPM Guidance, 2.4.4 Ambient Air Monitoring, and 2016 Ambient Monitoring Appendix found on AMTIC: www.epa.gov/ttn/amtic/files/policy/2016NPMGuidanceMonitoringAppendix.pdf)	Air Monitoring Network: Submit to EPA by July 1, 2017 the annual air monitoring network plan (40 CFR 58.10). State Plan should be made available for public and EPA review by May 31, 2017 at the latest. The Plan should include ensuring monitoring networks are consistent with the requirements of recent NO ₂ , SO ₂ , CO, lead and ozone NAAQS rules, in particular. (OAQPS M08)(FY'16-17 OAR NPM Guidance, and 2017 Ambient Monitoring Appendix to be found on AMTIC.)	BW 9/22/15	DBC 9/15/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
29		Air Monitoring Network: Operate EPA-approved network (SLAMS, PAMS, PM), enter the air monitoring, precision and accuracy data into AQS within 90 days (180 days for PAMS) of the end of each calendar quarter (40 CFR 58.12, 58.14, & 58.16) (OAQPS M11, OAQPS M12) and submit the Annual Air Quality Data certification by May 1, 2016 (40 CFR 58.15) (OAQPS M06) (FY'16-17 OAR NPM Guidance, 2.4.4 Ambient Air Monitoring, and 2016 Ambient Monitoring Appendix found on AMTIC.)	Air Monitoring Network: Operate EPA-approved network (SLAMS, PAMS, PM), enter the air monitoring, precision and accuracy data into AQS within 90 days (180 days for PAMS) of the end of each calendar quarter (40 CFR 58.12, 58.14, & 58.16) (OAQPS M11, OAQPS M12) and submit the Annual Air Quality Data certification by May 1, 2017 (40 CFR 58.15) (OAQPS M06)(FY'16-17 OAR NPM Guidance, and 2017 Ambient Monitoring Appendix to be found on AMTIC.)	BW 9/22/15	DBC 9/15/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
30		Quality Assurance: Ensure all approved QAPPs are reviewed by November 1, 2015, and confirm this in writing to EPA. Major changes will require a QAPP revision. Ensure adequate, independent QA audits of NAAQS monitors or participate in NPAP and PEP QA programs. (OAQPS M10)(FY'16-17 OAR NPM Guidance: 2.4.4 Air Monitoring.)	Quality Assurance: Ensure all approved QAPPs are reviewed by November 1, 2016, and confirm this in writing to EPA. Major changes will require a QAPP revision. Ensure adequate, independent QA audits of NAAQS monitors or participate in NPAP and PEP QA programs. (OAQPS M10)(FY'16-17 OAR NPM Guidance: 2.4.4 Air Monitoring, and Ambient Monitoring Appendix to be found at AMTIC.)	BW 9/22/15	DBC 9/15/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
31		Toxics Air Monitoring: Continue operation of the toxics air monitoring sites and enter the data into AQS. State should analyze data collected. (OAQPS M20)(FY'16-17 NPM Guidance: 2.6.4 Air Monitoring for Toxics, and 2016 Ambient Monitoring Appendix found on AMTIC.)	Toxics Air Monitoring: Continue operation of the toxics air monitoring sites and enter the data into AQS. State should analyze data collected. (OAQPS M20)(FY'16-17 NPM Guidance: 2.6.4 Air Monitoring for Toxics, and 2017 Ambient Monitoring Appendix to be found on AMTIC.)	BW 9/22/15	DBC 9/15/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
32		Technical Systems Audit: Participate and respond to EPA in a Technical Systems Audit (TSA) for VT DEC during FY'16. (OAQPS M07)		BW 9/22/15	DBC 9/15/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
33			Air Monitoring Network: Implement requisite changes to air monitoring network consistent with final ozone NAAQS rule from October, 2015. Anticipated changes include lengthened ozone season, and revisions to PAMS program. (FY'16-17 OAR NPM Guidance, and 2017 Ambient Monitoring Appendix to be found on AMTIC.)	BW 9/22/15	DBC 9/15/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
34		Programmatic forum: EPA Region 1 will work with NESCAUM and the states to establish a programmatic forum to discuss ambient air monitoring issues, initiatives and new requirements. Topics to be discussed include implementation of changes due to revised ozone rule, including PAMS, national priorities such as near road monitoring, regional priorities such as wood smoke /elevated PM in areas of concern, and fiscal limitations and constraints.		HH, 9/22/15	DBC 9/25/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
35		Technical forum: EPA Region 1 will help facilitate scheduling of at least one technical forum during FY '16 to help ensure the technical air monitoring staff are properly trained and best practices are shared among all air staff in each State and tribe in EPA Region 1.		HH, 9/22/15	DBC 9/25/15	Robert Lacaillade 272-3093	Tech: Bob Judge -8387			HH, 11/14/16	DBC - 11/21/16
35b	RN						Tech: Bob Judge -8387	Pursuant to MPG workplan, purchase ambient air monitoring equipment and supplies/standards to support and enhance VT's air quality monitoring network. Funding will help fund the purchase of much needed updated monitoring equipment and associated peripherals to allow for the continued monitoring of VT's air quality. Funding will also assist VT in meeting EPA QA and audit requirements. Equipment and supplies may include the following or their equivalent: MetOne BAMS (3); API (e.g. 700, T400, T300U) to improve data quality at SLAMS sites; Thermo 2025i for Underhill and Rutland; and Aglaire data logger at Underhill NCore site.		HH, 11/14/16	DBC - 11/21/16

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				VT DEC	EPA					VT DEC	EPA
		GOAL 2: PROTECTING AMERICA'S WATERS	GOAL 2: PROTECTING AMERICA'S WATERS								
		<i>Source Water Protection</i>	<i>Source Water Protection</i>			VT DW & GW Protection Division Director: Bryan Redmond - 585-4900	Senior Program Manager: Jane Downing -1571				
1		Continue to support implementation of local source water protection programs and, where appropriate, continue to integrate source water protection implementation into other programs appropriate (e.g., UIC, stormwater). (SP-4) State expects to begin increasing technical assistance, outreach, and education source water capabilities in the coming years to improve utilizing the multi-barrier approach to safe drinking water.	Continue to support implementation of local source water protection programs and, where appropriate, continue to integrate source water protection implementation into other programs appropriate (e.g., UIC, stormwater). (SP-4) State expects to begin increasing technical assistance, outreach, and education source water capabilities in the coming years to improve utilizing the multi-barrier approach to safe drinking water.	RP; 12/10/15	LMG; 9/9/2015	Rodney Pingree -585-4912	Manager: Jane Downing -1571 Tech: Kira Jacobs - 1817				
		<i>Drinking Water</i>	<i>Drinking Water</i>			VT DW & GW Protection Division Director: Bryan Redmond - 585-4900	Senior Program Manager: Jane Downing -1571		FY17 Note: VT DEC DW & GW Protection Division Director contact name/info updated in each repeated area.		
2		Work to achieve target of 92% of the population served by CWSs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 2.1.1)	Work to achieve target of 92% of the population served by CWSs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 2.1.1)	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Lynn Gilleland - 1516				
3		Work to achieve target of 90% of CWSs that provide drinking water that meets all applicable health-based standards through approaches including effective treatment and source water protection. (SP-1)	Work to achieve target of 90% of CWSs that provide drinking water that meets all applicable health-based standards through approaches including effective treatment and source water protection. (SP-1)	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Lynn Gilleland - 1516				
4		Work to achieve target of 95% of "person months" (i.e., all persons served by CWSs times 12 months) during which CWSs provide drinking water that meets all applicable health-based drinking water standards. (SP-2)	Work to achieve target of 95% of "person months" (i.e., all persons served by CWSs times 12 months) during which CWSs provide drinking water that meets all applicable health-based drinking water standards. (SP-2)	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Lynn Gilleland - 1516				
5		Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primacy approval.	Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primacy approval.		LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Denise Springborg				
		RTCR Rule: Work on preparations to submit a complete primacy package application by extension deadline in Feb. 2017	RTCR Rule: Work on preparations to submit a complete primacy package application by extension deadline in Feb. 2017	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Denise Springborg				
6		LT2/Stage2: implement rules and work with Region to make any changes necessary to obtain final primacy approval.	LT2/Stage2: implement rules and work with Region to make any changes necessary to obtain final primacy approval.	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Kevin Reilly - 1694				
7		Lead and Copper Rule (LCR): Implement rule and work towards primacy package approval for both LCR MR (2002) and LCR STR (2007). Continue to follow-up on any LCR action items.	Lead and Copper Rule (LCR): Implement rule and work towards primacy package approval for both LCR MR (2002) and LCR STR (2007). Continue to follow-up on any LCR action items.	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Ellie Kwong -1592				
8	RR	Sanitary surveys: All CWS have undergone a sanitary survey within 3 years of the last survey. Three year cycle for surveys conducted at CWSs will be measured based on the period 1/1/13 through 12/31/15; ensure 100% of CWSs served by surface water/GWUDI are surveyed in this time period. For Groundwater Rule, complete a survey for all groundwater CWS on a three year cycle and all NTNCWSs on a five year cycle (i.e., ~50 NTNCWS/year). Report all surveys to (SDW1a)	Sanitary surveys: All CWS have undergone a sanitary survey within 3 years of the last survey. Three year cycle for surveys conducted at CWSs will be measured based on the period 1/1/13 through 12/31/15; ensure 100% of CWSs served by surface water/GWUDI are surveyed in this time period. For Groundwater Rule, complete a survey for all groundwater CWS on a three year cycle and all NTNCWSs on a five year cycle (i.e., ~50 NTNCWS/year). Report all surveys to (SDW1a)	TR 12/10/2105	LMG; 9/9/2015	Patrick Smart -461-5661	Manager: Jane Downing -1571 Tech: Lynn Gilleland - 1516	See note in FY16-17 negotiations.	[Please use this revised text for FY17:] "Sanitary surveys: All CWS have undergone a sanitary survey within 3 years of the last survey. Three year cycle for surveys conducted at CWSs will be measured based on the period 1/1/14 through 12/31/16; ensure 100% of CWSs served by surface water/GWUDI are surveyed in this time period. For Groundwater Rule, complete a survey for all groundwater CWS on a three year cycle and all NTNCWSs on a five year cycle (i.e., ~51 NTNCWS/year). Report all surveys to (SDW1a)"	TR - 12/2/2016	LMG - 1/18/17

9	RR	Sanitary surveys: All TNCWSs will meet the five year cycle (~143/yr) with progress and capacity evaluated at the mid-year point. Report all surveys to SDWIS. (SDW1a)	Sanitary surveys: All TNCWSs will meet the five year cycle (~143/yr) with progress and capacity evaluated at the mid-year point. Report all surveys to SDWIS. (SDW1a)	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Lynn Gilleland - 1516		(Please use this revised text for FY17:) Sanitary surveys: All TNCWSs will meet the five year cycle (~146/yr) with progress and capacity evaluated at the mid-year point. Report all surveys to SDWIS. (SDW1a)	BLM 12/5/2016	LMG - 1/18/17
10		All Hazards/Climate Resiliency: continue to help water systems prepare/protect infrastructure and water quality impacted by extreme weather events; coordinate with EPA on related workshops and exercises; and provide technical assistance to drinking water systems. State will report the number of drinking water systems receiving technical assistance. (SDW-21).	All Hazards/Climate Resiliency: continue to help water systems prepare/protect infrastructure and water quality impacted by extreme weather events; coordinate with EPA on related workshops and exercises; and provide technical assistance to drinking water systems. State will report the number of drinking water systems receiving technical assistance. (SDW-21).	LC 12/10/2105	LMG; 12/21/2015	Lynette Claudon - 490-6226	Manager: Jane Downing -1571 Tech: Lynn Gilleland - 1516				
11		Maintain timely and accurate reporting to SDWIS and otherwise comply with 40 CFR 142.15. State will also work towards preparing to migrate data from SDWIS State and state-developed data systems to SDWIS Prime during FY 2016.	Maintain timely and accurate reporting to SDWIS and otherwise comply with 40 CFR 142.15. State will also work towards preparing to migrate data from SDWIS State and state-developed data systems to SDWIS Prime during FY 2017.	BLM; 09/09/2015	LMG; 9/9/2015	Ben Montross - 498-8981	Manager: Jane Downing -1571 Tech: Emanuel Souza - 1594				
12		Coordinate with EPA on mid-year and year-end PWSS reviews, including status of various rule implementation, GPRA progress, and resource issues.	Coordinate with EPA on mid-year and year-end PWSS reviews, including status of various rule implementation, GPRA progress, and resource issues.	EPD; 12/10/2015	LMG; 9/9/2015	Ellen Parr Doering - 236-1483	Manager: Jane Downing -1571 Tech: Lynn Gilleland - 1516				
13		Work to achieve target of 100% of the FY2016 and FY2017 EPA Region 1 Drinking Water Annual Commitment Measures for Vermont thru timely and appropriate actions as discussed in EPA's 12/8/09 Drinking Water Enforcement Response Policy that address and/or return public water systems identified by the Enforcement Targeting Tool to compliance.	Work to achieve target of 100% of the FY2016 and FY2017 EPA Region 1 Drinking Water Annual Commitment Measures for Vermont thru timely and appropriate actions as discussed in EPA's 12/8/09 Drinking Water Enforcement Response Policy that address and/or return public water systems identified by the Enforcement Targeting Tool to compliance.	BLM; 09/09/2015	JChow 9/9/15	Ben Montross - 498-8981	Manager: Denny Dart - 918-1850 Tech: Ken Rota - 918-1751				
		<i>UIC</i>	<i>UIC</i>			VT DW & GW Protection Division Director: Byran Redmond - 585-4900	Senior Program Manager: Jane Downing-1571				
14		Continue to identify and to close motor vehicle waste disposal wells and large capacity cess pools; report number identified and number closed (UIC National Measure SDW-8). Continue to report UIC activities (e.g., number of inspections conducted, number of permits issued, number of wells closed, UIC enforcement activity, etc.) to EPA per 7520 forms or equivalent through the National Exchange Network.	Continue to identify and to close motor vehicle waste disposal wells and large capacity cess pools; report number identified and number closed (UIC National Measure SDW-8). Continue to report UIC activities (e.g., number of inspections conducted, number of permits issued, number of wells closed, UIC enforcement activity, etc.) to EPA per 7520 forms or equivalent through the National Exchange Network.	DA 9/11/15	DS 9/11/15	Darlene Autery - 477-3441/Mary Clark 585-4890	Manager: Denise Springborg - 1681; Contact: Andrea Traviglia - 1993				
15	RR	Prepare supporting documents for the UIC primacy package, including the Crosswalk document, and review with EPA.	Submit the UIC primacy package to the EPA.	DA 9/11/15	DS 9/11/15	Darlene Autery - 477-3441/Mary Clark 585-4890	Manager: Denise Springborg - 1681; Contact: Andrea Traviglia - 1993	RR	Submit and review UIC Rule rewrite in preparation of future UIC package submittal	DMA, 11/4/2016	DCS 1/18/17
16		Review existing inventory procedures, identify inventory collection gaps and implement improvements for registering UIC Class V wells in accordance with 40 CFR 144.26(a) inventory collection requirements and the state's Exchange Network grant.	Continue to implement improvements for registering UIC Class V wells in accordance with 40 CFR 144.26(a) inventory collection requirements and the state's Exchange Network grant.	DA 9/11/15	DS 9/11/15	Darlene Autery - 477-3441/Mary Clark 585-4890	Manager: Denise Springborg - 1681; Contact: Andrea Traviglia - 1993				
		Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems	Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems								
		<i>Water Monitoring</i>	<i>Water Monitoring</i>			Pete LaFlamme 490-6190	Senior Program Manager Katrina Kipp -8309				
17		Continue implementing comprehensive water monitoring strategy covering lakes, rivers, estuaries and wetlands.	Continue implementing comprehensive water monitoring strategy covering lakes, rivers, estuaries and wetlands.	NCK - 9/10/15	KK 9/18/15	Neil Kamman - 490-6137	Manager: Katrina Kipp -8309 Tech: Diane Switzer -9377			NCK - 9/10/15	
18		Conduct statewide probabilistic survey and assessment of at least one water resource and at least one designated use with applicable water quality standard. Provide schedule and progress report for multi-year surveys.	Conduct statewide probabilistic survey and assessment of at least one water resource and at least one designated use with applicable water quality standard. Provide schedule and progress report for multi-year surveys.	NCK - 9/10/15	KK 9/18/15	Neil Kamman- 490-6137	Manager: Katrina Kipp -8309 Tech: Diane Switzer -9377			NCK - 9/10/15	
19		Report on outcomes of monitoring activities using FY2015 106 supplemental funding for monitoring by Dec. 31, 2016, and prepare workplan for FY2016 106 supplemental funds by April 15, 2016.	Report on outcomes of monitoring activities using FY2016 106 supplemental funding for monitoring by Dec. 31, 2017, and prepare workplan for FY2017 106 supplemental funds by April 15, 2017.	NCK - 9/10/15	KK 9/18/15	Neil Kamman - 490-6137	Manager: Katrina Kipp -8309 Tech: Diane Switzer -9377			NCK - 9/10/15	
20		Participate as feasible in New England-wide projects and activities, and attend relevant regional meetings/conferences (e.g., NEAEB).	Participate as feasible in New England-wide projects and activities, and attend relevant regional meetings/conferences (e.g., NEAEB).	NCK - 9/10/15	KK 9/18/15	Rich Langdon -490-6147	Manager: Katrina Kipp -8309 Tech: Hilary Snook -8670			NCK - 9/10/15	
21		Participate in or coordinate with EPA Office of Water's National Aquatic Resource Surveys (NARS) and submit workplan reflecting level of participation.	Participate in or coordinate with EPA Office of Water's National Aquatic Resource Surveys (NARS) and submit workplan reflecting level of participation.	NCK - 9/10/15	KK 9/18/15	Neil Kamman - 490-6137	Manager: Katrina Kipp -8309 Tech: Hilary Snook -8670			NCK - 9/10/15	

		303(d)/305(b)	303(d)/305(b)				Pete LaFlamme --490-6190	Senior Program Managers: Katrina Kipp -8309 & Ralph Abele -1629				
22		Submit 305(b)/303(d) Integrated Report by April 1, 2016.	Submit electronic updates to the 305(b)/303(d) Integrated Report by April 1, 2017.	NCK - 9/10/15	KK 9/18/15	Neil Kamman - 490-6137	Neil Kamman - 490-6137	Senior Program Managers: Katrina Kipp -8309 & Ralph Abele -1629			NCK - 9/10/15	
23		Update CALM as needed by Oct. 31, 2015.	Update CALM as needed by Oct. 31, 2017.	NCK - 9/10/15	KK 9/18/15	Neil Kamman - 490-6137	Neil Kamman - 490-6137	Senior Program Managers: Katrina Kipp -8309 & Ralph Abele -1629			NCK - 9/10/15	
24		Georeference waters to NHD (1:24,000 or finer resolution) if not already done.	Georeference waters to NHD (1:24,000 or finer resolution) if not already done.	NCK - 9/10/15	KK 9/18/15	Neil Kamman - 490-6137	Neil Kamman - 490-6137	Manager: Katrina Kipp -8309 Tech: Diane Switzer -9377			NCK - 9/10/15	
	RN					Tim Clear -490-6135	Tim Clear -490-6135	Manager: Katrina Kipp -8309 Tech: Diane Switzer -9377	ATTAINS Implementation: Attend EPA data systems meeting on Nov. 29, 2016 at EPA lab and national ATTAINS workshops during FY2017, including in Shepherdstown, WV. Begin implementing ATTAINS by March 30, 2017 and complete transfer of state ADB assessment information into ATTAINS by July 1, 2017.	Changed contact to Tim Clear	TC - 12/2/2016	KK 12/27/16
		STORET/WQX (Water Quality Exchange)	STORET/WQX (Water Quality Exchange)				Pete LaFlamme --490-6190	Senior Program Manager Katrina Kipp -8309				
25		Provide annual uploads of physical, chemical and biological monitoring data to WQX (STORET).	Provide annual uploads of physical, chemical and biological monitoring data to WQX (STORET).	NCK - 9/10/15	KK 9/18/15	Neil Kamman - 490-6137	Neil Kamman - 490-6137	Manager: Katrina Kipp -8309 Tech: Diane Switzer -9377			NCK - 9/10/15	
		Water Quality Standards - Biological, Nutrient, Temperature	Water Quality Standards - Biological, Nutrient, Temperature				Neil Kamman - 490-6137 - Pete LaFlamme --490-6190	Senior Program Manager: Ralph Abele-1629				
26		Continue development of numerical biological criteria for streams and lakes/ponds. Consider options for using NWCA dataset to begin developing wetlands biocriteria.	Continue development of numerical biological criteria for streams and lakes/ponds. Consider options for using NWCA dataset to begin developing wetlands biocriteria.	NCK - 9/10/15	KK 9/18/15	Rich Langdon - 490-6147	Rich Langdon - 490-6147	Manager: Katrina Kipp -8309 Tech: Hilary Snook -8670			NCK - 9/10/15	
27		Continue efforts toward addressing flow quantity, water level and temperature issues to ensure protection of instream waters uses. EPA will continue efforts toward addressing flow quantity and water level issues to ensure protection of instream water users and quality with VTDEC, VTFW, and other state and federal agencies	Continue efforts toward addressing flow quantity, water level and temperature issues to ensure protection of instream waters uses. EPA will continue efforts toward addressing flow quantity and water level issues to ensure protection of instream water users and quality with VTDEC, VTFW, and other state and federal agencies	MK; 12/10/2015	RWA 12/8/15	Mike Kline -490-6155	Mike Kline -490-6155	Manager: Ralph Abele-1629 Tech: Ralph Abele -1629				
28		Continue ongoing WQS reviews, activities, and work with EPA to resolve outstanding issues. (WQ-03a, WQ-04a)	Continue ongoing WQS reviews, activities, and work with EPA to resolve outstanding issues. (WQ-03a, WQ-04a)	NCK - 9/10/15	RWA12/8/15	Pete LaFlamme 490-6190 - Neil Kamman - 490-6137	Pete LaFlamme 490-6190 - Neil Kamman - 490-6137	Manager: Ralph Abele-1629 Tech: TBD			NCK - 9/10/15	
29		[Antidegradation placeholder]				Pete LaFlamme 490-6190	Pete LaFlamme 490-6190	Manager: Ralph Abele-1629 Tech: TBD	Begin Development of anti-degradation implementation rule	Necessary changes to Vermont Water Quality Standards passed through formal rulemaking; time is not ripe to update Vermont's interim anti-deg procedure into formal rule	MLB - 12/2/2016	RWA-1/24/17
		TMDL Development	TMDL Development									
30		Work toward completion of any remaining prior year TMDL commitments.	Work toward completion of any remaining prior year TMDL commitments.	TC - 9/11/15	RWA 12/8/15	Tim Clear-490-6135	Tim Clear-490-6135	Manager: Ralph Abele-1629 Tech: Eric Perkins -1602			TC - 9/11/15	
31		By 07/31/15, provide EPA R1 with a draft list of 303(d) Vision priority waters, scheduled for 2016-2022 timeframe, and electronic data for entry into ATTAINS database by EPA HQ. (WQ27)		TC - 9/11/15	RWA 12/8/15	Tim Clear-490-6135	Tim Clear-490-6135	Manager: Ralph Abele-1629 Tech: Eric Perkins -1602			TC - 9/11/15	
32		By 09/30/15, agree on FY16 waterbody commitments for TMDL development (future substitutions allowed), TMDL alternatives, and protection plans, as appropriate. During FY16 and before 09/30/16, submit TMDLs to EPA for review and approval, along with TMDL alternatives and protection plans as per the state's schedule for 303(d) Vision priorities (WQ-27) and other planned activities. (WQ-28)	By 09/30/16, agree on FY17 waterbody commitments for TMDL development (future substitutions allowed), TMDL alternatives, and protection plans, as appropriate. During FY17 and before 09/30/17, submit TMDLs to EPA for review and approval, along with TMDL alternatives and protection plans as per the state's schedule for 303(d) Vision priorities (WQ-27) and other planned activities. (WQ-28)	TC - 9/11/15	RWA 12/8/15	Tim Clear-490-6135	Tim Clear-490-6135	Manager: Ralph Abele-1629 Tech: Eric Perkins -1602			TC - 9/11/15	

33	By 03/30/16, complete public review of 303(d) Vision priorities (WQ-27) and other planned activities (WQ-28), and schedule; By 05/31/16, submit to EPA the final list of 303(d) Vision priorities (WQ-27) and other planned activities (WQ-28), schedule, and response to public comments. (EPA anticipates an "open season" in the ATTAINS database to accommodate 303(d) Vision priority updates/revisions circa May 2016.)	Circa fall 2016, if needed, and following public and EPA review, submit electronic data to EPA during the FY17 "open season" in ATTAINS to accommodate any essential revisions to 303(d) Vision priorities (WQ-27) and other planned activities. (WQ-28)	TC - 9/11/15	JH 12/17	Tim Clear-490-6135				TC - 9/11/15
34	If the State chooses to pursue partial credit for progress on priority TMDLs, TMDL alternatives, and protection plans, then notify EPA R1 of milestones achieved (planning, developing) for entry into ATTAINS by October 31, 2016.	If the State chooses to pursue partial credit for progress on priority TMDLs, TMDL alternatives, and protection plans, then notify EPA R1 of milestones achieved (planning, developing) for entry into ATTAINS by October 31, 2017.	TC - 9/11/15	RWA 12/8/15	Tim Clear-490-6135				TC - 9/11/15
35	Participate in Region 1/State/NEIWPCC TMDL efforts to improve environmental effectiveness of the TMDL program.	Participate in Region 1/State/NEIWPCC TMDL efforts to improve environmental effectiveness of the TMDL program.	TC - 9/11/15	RWA12/8/15	Tim Clear-490-6135				TC - 9/11/15
	<i>Watershed Approach</i>	<i>Watershed Approach</i>			Pete LaFlamme 490-6190	Senior Program Manager Johanna Hunter - 1041 or Mel Coté - 1553			
36	Submit a list of water bodies and HUC-12 watersheds to EPA by 9/30/15 that the state is working to fully or partially restore by 2016. (SP-10, SP-11, SP-12)	Submit a list of water bodies and HUC-12 watersheds to EPA by 9/30/16 that the state is working to fully or partially restore by 2017. (SP-10, SP-11, SP-12)	RH; 12/10/2105	JH 12/17	Tim Clear -490-6135	Manager: Johanna Hunter - 1041 Tech: Eric Perkins - 1602			
37	In these priority water bodies and watersheds, work to leverage existing tools and resources such as the state's TMDL, nonpoint source, water quality, permit, SRF, and source water assessment programs to concentrate implementation efforts and to measure improvements. Report progress on restoring these priority waters and watersheds by 1/30/2016. (SP-10, SP-11, SP-12)	In these priority water bodies and watersheds, work to leverage existing tools and resources such as the state's TMDL, nonpoint source, water quality, permit, SRF, and source water assessment programs to concentrate implementation efforts and to measure improvements. Report progress on restoring these priority waters and watersheds by 1/30/2017. (SP-10, SP-11, SP-12)	RH; 12/10/2105	JH 12/17	Tim Clear -490-6135	Manager: Johanna Hunter - 1041 Tech: Eric Perkins - 1602			
	<i>NPS 319</i>	<i>NPS 319</i>			Pete LaFlamme -490-6190	Senior Program Manager: Johanna Hunter - 1041			
38	National Guidelines: Use the Nonpoint Source Program and Grants Guidelines for States and Territories released on April 12, 2013, to identify eligible activities, program priorities, programmatic conditions, and reporting requirements. At least 50% of 319 funding will be used for watershed-based plan (WBP) implementation unless DEC can show evidence of state funded projects as leverage. One nine-element WBP per state will be submitted annually to the Region for review; all alternative watershed-based plans will be submitted to the Region for review and approval. States will target 319 funding toward restoration of priority segments, waters bodies or watersheds, and protection of documented high priority healthy and threatened waters.	National Guidelines: Use the Nonpoint Source Program and Grants Guidelines for States and Territories released on April 12, 2013, to identify eligible activities, program priorities, programmatic conditions, and reporting requirements. At least 50% of 319 funding will be used for watershed-based plan (WBP) implementation unless DEC can show evidence of state funded projects as leverage. One nine-element WBP per state will be submitted annually to the Region for review; all alternative watershed-based plans will be submitted to the Region for review and approval. States will target 319 funding toward restoration of priority segments, waters bodies or watersheds, and protection of documented high priority healthy and threatened waters.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins - 1602		Changed contact to Emily Bird	
39	Attendance at NPS meetings/training: A representative of the state's NPS program is expected to attend NPS and GRTS national and regional meetings convened by EPA unless prevented by state-wide travel bans. States shall utilize s.319 funds to cover travel expenses for NPS program staff to participate in regional and national GRTS training meetings, national NPS conferences, and regional meetings and conferences, unless other state funds are available for this purpose. State workplans should ensure that adequate 319 funding is set aside annually for this purpose.	Attendance at NPS meetings/training: A representative of the state's NPS program is expected to attend NPS and GRTS national and regional meetings convened by EPA unless prevented by state-wide travel bans. States shall utilize s.319 funds to cover travel expenses for NPS program staff to participate in regional and national GRTS training meetings, national NPS conferences, and regional meetings and conferences, unless other state funds are available for this purpose. State workplans should ensure that adequate 319 funding is set aside annually for this purpose.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins - 1602		Changed contact to Emily Bird	
40	Working with USDA and other agencies: Continue to work with government agencies to address and improve areas of environmental concerns; e.g., impaired waters, depleted or altered stream flows, etc. Cooperate with USDA through participation on the State Technical Committee to look for opportunities to leverage Farm Bill funds for high priority water restoration projects, including 319-related projects. In FY16 participate in the NRCS Water Quality Initiative. Collaborate on planning for monitoring one small NRCS WQI watershed (contingent upon NRCS providing adequate information to develop a targeted monitoring plan). Coordinate with partners to implement the NWQI monitoring plan contingent on the continued participation and support of NRCS in this initiative.	Working with USDA and other agencies: Continue to work with government agencies to address and improve areas of environmental concerns; e.g., impaired waters, depleted or altered stream flows, etc. Cooperate with USDA through participation on the State Technical Committee to look for opportunities to leverage Farm Bill funds for high priority water restoration projects, including 319-related projects. In FY17, participate in the National Water Quality Initiative with NRCS, identify results from the previous year's participation in it, and identify next steps. Collaborate on planning for monitoring one small NRCS WQI watershed (contingent upon NRCS providing adequate information to develop a targeted monitoring plan). Coordinate with partners to implement the NWQI monitoring plan contingent on the continued participation and support of NRCS in this initiative.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins - 1602		Changed contact to Emily Bird	

41		Success Stories: Submit success stories for waterbodies that have been fully or partially delisted in previous years, and/or that show improvement in water quality or demonstrate ecological restoration (WQ-10). To do this, identify water bodies that were recently partially or fully delisted, or that demonstrate water quality or habitat improvement, and investigate whether local, state, federal or private NPS mitigation occurred that might make these waterbodies a candidate for a NPS Success Story. Using EPA's guidance (http://water.epa.gov/polwaste/nps/success319/info.cfm#cat1), prepare and submit to EPA a success story for all candidate water bodies by June 1st. See http://water.epa.gov/polwaste/nps/success319/ for examples of success stories and other information.	Success Stories: Submit success stories for waterbodies that have been fully or partially delisted in previous years, and/or that show improvement in water quality or demonstrate ecological restoration (WQ-10). To do this, identify water bodies that were recently partially or fully delisted, or that demonstrate water quality or habitat improvement, and investigate whether local, state, federal or private NPS mitigation occurred that might make these waterbodies a candidate for a NPS Success Story. Using EPA's guidance (http://water.epa.gov/polwaste/nps/success319/info.cfm#cat1), prepare and submit to EPA a success story for all candidate water bodies by June 1st. See http://water.epa.gov/polwaste/nps/success319/ for examples of success stories and other information.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins -1602		Changed contact to Emily Bird		
42		GRTS: Within 90 days of receipt of a categorical grant or receipt of final 319 funding under a PPG award, enter into the Grants Reporting Tracking System (GRTS) all 319 grant mandatory data elements except for best management practices data and load reduction model and data. By February 15th, complete annual GRTS reporting by entering all remaining mandatory BMP and load reduction data (if applicable). Provide timely review of national GRTS reports prepared for the state.	GRTS: Within 90 days of receipt of a categorical grant or receipt of final 319 funding under a PPG award, enter into the Grants Reporting Tracking System (GRTS) all 319 grant mandatory data elements except for best management practices data and load reduction model and data. By February 15th, complete annual GRTS reporting by entering all remaining mandatory BMP and load reduction data (if applicable). Provide timely review of national GRTS reports prepared for the state.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins -1602		Changed contact to Emily Bird		
43		Annual Report: In accordance with the CWA and following the current Nonpoint Source Program and Grants Guidelines, report annually on progress made in implementing the state's NPS Management Program, including a summary of major accomplishments and completed milestones, a description of 319-funded statewide programs and completed 319-funded watershed projects, a list of active 319 projects with expected completion dates, a brief summary of water quality improvements (e.g. restoration of impaired waters or other notable environmental results) and NPS pollutant load reductions (total phosphorus, nitrogen, and sediment reductions for the state, from the previous February's GRTS reporting). Where information is not yet available on load reductions and water quality improvement where implementation is underway, surrogate measures of environmental progress should be used.	Annual Report: In accordance with the CWA and following the current Nonpoint Source Program and Grants Guidelines, report annually on progress made in implementing the state's NPS Management Program, including a summary of major accomplishments and completed milestones, a description of 319-funded statewide programs and completed 319-funded watershed projects, a list of active 319 projects with expected completion dates, a brief summary of water quality improvements (e.g. restoration of impaired waters or other notable environmental results) and NPS pollutant load reductions (total phosphorus, nitrogen, and sediment reductions for the state, from the previous February's GRTS reporting). Where information is not yet available on load reductions and water quality improvement where implementation is underway, surrogate measures of environmental progress should be used.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins -1602		Changed contact to Emily Bird		
44		Workplan: Submit an annual workplan that is responsive to Regional guidance and that describes 319-related work, including how the state is organized to implement the NPS management plan and achieve its broad goals (e.g., staffing, training, technology transfer, financial assistance, public outreach, etc.), as well as proposed projects and activities for the year consistent with management plan priorities and milestones.	Workplan: Submit an annual workplan that is responsive to Regional guidance and that describes 319-related work, including how the state is organized to implement the NPS management plan and achieve its broad goals (e.g., staffing, training, technology transfer, financial assistance, public outreach, etc.), as well as proposed projects and activities for the year consistent with management plan priorities and milestones.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins -1602		Changed contact to Emily Bird		
45		Progress and Performance Review: EPA will use information provided by the state (annual report, workplan, GRTS entry, success stories) to determine whether the State has made satisfactory progress in implementing its NPS Management Program in accordance with CWA Section 319(h)(8). If appropriate, EPA will request additional information to assist with the determination. EPA will complete an annual checklist on Progress and Performance and document its findings.	Progress and Performance Review: EPA will use information provided by the state (annual report, workplan, GRTS entry, success stories) to determine whether the State has made satisfactory progress in implementing its NPS Management Program in accordance with CWA Section 319(h)(8). If appropriate, EPA will request additional information to assist with the determination. EPA will complete an annual checklist on Progress and Performance and document its findings.	RH; 12/10/2105	JH 11/2/15	Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins -1602		Changed contact to Emily Bird		
	RN					Emily Bird - 490-083	Manager: Johanna Hunter - 1041 Tech: Eric Perkins -1602	Develop criteria for determining NPS threatened waters. Create list based on criteria to identify priority NPS threatened surface waters. Output is the number of waters identified on the list; this number is unknown.	multi-purpose grant. Changed contact to Emily Bird	EB - 11/12/16	EP - 04/11/17
		<i>NPDES Development</i>	<i>NPDES Development</i>				Senior Program Managers: David Webster -1791				
46		Action Items to be implemented: Ensure Vermont permits contain citations to the current 2002 EPA WET test methods and ensure a sufficient amount of WET monitoring data is required to assess WET reasonable potential, and to establish limits if necessary. If these action items has not been completed in FY2015, complete documentation in FY2016. (Action Items VT-11-02 and 88, and in recent draft PQR)	Action Items to be implemented: Ensure Vermont permits contain citations to the current 2002 EPA WET test methods and ensure a sufficient amount of WET monitoring data is required to assess WET reasonable potential, and to establish limits if necessary. If these action items has not been completed in FY2016, complete documentation in FY2016. (Action Items VT-11-02 and 88, and in recent draft PQR)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791		Contact name changed to Mary Borg		

47		The State will continue its best efforts to reduce the NPDES backlog towards a level of not greater than 10% (the national goal) by completing permits for NPDES permits over the next 5 years, such that the backlog is reduced each of these years from FY14 to FY19. (WQ-12a)	The State will continue its best efforts to reduce the NPDES backlog towards a level of not greater than 10% (the national goal) by completing permits for NPDES permits over the next 5 years, such that the backlog is reduced each of these years from FY14 to FY19. (WQ-12a)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: Dave Webster -1791	Contact name changed to Mary Borg		
48		The State will maintain the pretreatment permit backlog to a level of no greater than 10%,(WQ-14).	The State will maintain the pretreatment permit backlog to a level of no greater than 10%,(WQ-14).	EFK 9/9/15	JP/MS - 10/1/15	Mary Borg - 490-6101	Managers: Mark Spinale - 1547, Tech, Jay Pimpare - 1531	Contact name changed to Mary Borg		
49		The state will inspect and sample Significant Industrial Users (SIUs) at 100% coverage annually.	The state will inspect and sample Significant Industrial Users (SIUs) at 100% coverage annually.	EFK 9/9/15	JP/MS - 10/1/15	Mary Borg - 490-6101	Managers: Mark Spinale -1547, Jay Pimpare - 1531	Contact name changed to Mary Borg		
50		The State will make every effort to issue the targeted number of priority permits for FY2016 which will be established in the last months of FY2015. There are likely to be about 11 priority permits in VT for FY2016. (WQ-19a)	The State will make every effort to issue the targeted number of priority permits for FY2017 which will be established in the last months of FY2016. There are likely to be about 10 priority permits in VT for FY2017. (WQ-19a)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
51		Continue to implement delegated NPDES storm water program, including Phase II MS4 permits, construction permits and industrial permits. (WQ-13b)	Continue to implement delegated NPDES storm water program, including Phase II MS4 permits, construction permits and industrial permits. (WQ-13b)	PM. 9/2/15	OK. dw 9/3/15	Padraic Monks -490-6169	Manager: David Webster -1577 Tech: Thelma Murphy - 1615			
52		Action Item to be implemented: Ensure the permit limits are derived to meet the Phosphorus and Nitrogen Criteria in current State Surface WQs when the permits are reissued. (40 CFR 122.44(d)) (VT-11-03).	Action Item to be implemented: Ensure the permit limits are derived to meet the Phosphorus and Nitrogen Criteria in current State Surface WQs when the permits are reissued. (40 CFR 122.44(d)) (VT-11-03).	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
53		Action Items to be implemented: Vermont needs to conduct a Reasonable Potential Analysis (RPA) for nutrients in all municipal permits and in industrial permits that discharge a significant level of nutrients. Each RPA needs to be based on worst case permitted/discharge levels of nutrients and upstream levels of nutrients that are representative of the flow condition under which criteria are being evaluated and should not be overridden by bioassessment data from just a single downstream site. (from recent draft PQR)	Action Items to be implemented: Vermont needs to conduct a Reasonable Potential Analysis (RPA) for nutrients in all municipal permits and in industrial permits that discharge a significant level of nutrients. Each RPA needs to be based on worst case permitted/discharge levels of nutrients and upstream levels of nutrients that are representative of the flow condition under which criteria are being evaluated and should not be overridden by bioassessment data from just a single downstream site. (from recent draft PQR)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
54		Action Item to be implemented: Ensure that permit reference applicable effluent limit guidelines (ELGs) for industrial permits. (40 CFR 124.56) If this action item has not been completed in FY2015, complete documentation in FY2016. (VT-11-01)	Action Item to be implemented: Ensure that permit reference applicable effluent limit guidelines (ELGs) for industrial permits. (40 CFR 124.56) If this action item has not been completed in FY2015, or FY2016, complete documentation in FY2017. (VT-11-01)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
55		Action Item to be implemented: Include the basis for technology-based permit requirements in fact sheets or the administrative record, including discussion of applicable, industry-specific ELG (and subpart) or, in the absence of an ELG, the basis for limitations based on best professional judgment. (from recent draft PQR)	Action Item to be implemented: Include the basis for technology-based permit requirements in fact sheets or the administrative record, including discussion of applicable, industry-specific ELG (and subpart) or, in the absence of an ELG, the basis for limitations based on best professional judgment. (from recent draft PQR)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
56		Action Item to be implemented: Ensure the permit fact sheets confirm and demonstrate consideration of water quality-based effluent limitation for permit limit derivation and present the selection of the more stringent effluent limitation. (40 CFR 122.44(d)) If this action item has not been completed in FY2015, complete documentation in FY2016. (VT-11-04)	Action Item to be implemented: Ensure the permit fact sheets confirm and demonstrate consideration of water quality-based effluent limitation for permit limit derivation and present the selection of the more stringent effluent limitation. (40 CFR 122.44(d)) If this action item has not been completed in FY2016, complete documentation in FY2017. (VT-11-04)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
57	Removed	Note: Action Item related to Waste Management Zones has been addressed and removed by EPA.	Note: Action Item related to Waste Management Zones has been addressed and removed by EPA.	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
58		Action Items to be implemented: Ensure the permit fact sheets are consistent with regulatory requirements that specifically describes the basis for permit requirements and decisions including (1) decisions of whether nutrients discharged have a reasonable potential to cause or contribute to an exceedance of Water Quality Standards and (2) the calculations for nutrient limits. If this action item has not been completed in FY2015, complete documentation in FY2016. (VT-11-06)	Action Items to be implemented: Ensure the permit fact sheets are consistent with regulatory requirements that specifically describes the basis for permit requirements and decisions including (1) decisions of whether nutrients discharged have a reasonable potential to cause or contribute to an exceedance of Water Quality Standards and (2) the calculations for nutrient limits. If this action item has not been completed in FY2016, complete documentation in FY2017. (VT-11-06)	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		
59		If not in FY15, develop a defensible phosphorous allocation in the Lake Champlain watershed based on the Lake Champlain TMDL and/or other information, to meet nutrient State Water Quality Standards in the receiving streams and lake. Develop the proposed dates for issuing the permits included in that allocation, including final permits in FY2015, FY2016 and FY2017.	If not in FY16, develop a defensible phosphorous allocation in the Lake Champlain watershed based on the Lake Champlain TMDL and/or other information, to meet nutrient State Water Quality Standards in the receiving streams and lake. Develop the proposed dates for issuing the permits included in that allocation, including final permits in FY2016 and FY2017.	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791	Contact name changed to Mary Borg		

60		Incorporating on your state agency website (or the R1 EPA NPDES Permitting website) state-issued IPs, Draft IPs, Fact sheets, GPs, the covered GP permittees, the dates of authorization for each GP permittee, and possibly the NOIs for each GP	Incorporating on your state agency website (or the R1 EPA NPDES Permitting website) state-issued IPs, Draft IPs, Fact sheets, GPs, the covered GP permittees, the dates of authorization for each GP permittee, and possibly the NOIs for each GP	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791		Contact name changed to Mary Borg		
61		If not completed in FY15, reissue Construction Stormwater General Permit (CGP) (expiration date of 2/5/2013), incorporating any applicable ELGs or limits from the C&D (Construction and Development) rule which became effective on February 1, 2010. The reissued CGP should include requirements to prevent spills and leaks (consistent with 40 CFR § 450.21(d)(3)) and to minimize exposure of likely sources of pollution to precipitation and stormwater (consistent with 40 CFR § 450.21(d)(1)). (Last sentence from recent draft PRQ)	If not completed in FY15 or FY16, reissue Construction Stormwater General Permit (CGP) (expiration date of 2/5/2013), incorporating any applicable ELGs or limits from the C&D (Construction and Development) rule which became effective on February 1, 2010. The reissued CGP should include requirements to prevent spills and leaks (consistent with 40 CFR § 450.21(d)(3)) and to minimize exposure of likely sources of pollution to precipitation and stormwater (consistent with 40 CFR § 450.21(d)(1)). (Last sentence from recent draft PRQ)	PM. 9/2/15	OK. dw 9/3/15	Padraic Monks -490-6169	Managers: David Webster -1791				
62		Reissue Industrial Stormwater General Permit (expiration date of 8/4/16).	Reissue Industrial Stormwater General Permit (expiration date of 8/4/16), if not reissued in FY16.	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791		Contact name changed to Mary Borg		
63		If not completed in FY2015, continue participating with EPA in finalizing a Permit Quality Review (PQR) for the VT NPDES program, which included a site visit in Nov. 2014.	If not completed in FY2015 or FY2016, continue participating with EPA in finalizing a Permit Quality Review (PQR) for the VT NPDES program, which included a site visit in Nov. 2014.	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791		Contact name changed to Mary Borg		
64		Note: Action Item related to NPDES MOA revision removed by EPA, but can be retained if requested by VT.	Note: Action Item related to NPDES MOA revision removed by EPA, but can be retained if requested by VT.	MB; 12/10/2105		Mary Borg 490-6101	Managers: David Webster -1791	Develop an updated MOA for EPA/State NPDES coordintion in conjunction with VT's update of its NPDES Rules.	Vermont's NPDES MOA is out of date; Vermont plans on updating its NPDES Rule in 2017-2018 and it makes sense to update the NPDES MOA at the same time. DW - OK we could add back in something like this for FY17 (or hold off for FY18): "Develop an updated MOA for EPA/State NPDES coordintion in conjunction with VT's update of its NPDES Rules."	MB 4/11/17	DW 4/11/17
65		For permittees subject to CWA §316(b), VT will provide timely information to the federal Endangered Species Act (ESA) Services (NOAA and USFWS), including permit applications for a 60 day review, as provided in the new Cooling Water Intake Structure (CWIS) Existing Facility Rule.	For permittees subject to CWA §316(b), VT will provide timely information to the federal Endangered Species Act (ESA) Services (NOAA and USFWS), including permit applications for a 60 day review, as provided in the new Cooling Water Intake Structure (CWIS) Existing Facility Rule.	EFK 9/9/15	OK. dw 9/10/15	Mary Borg - 490-6101	Managers: David Webster -1791		Contact name changed to Mary Borg		
		<i>Wetlands</i>	<i>Wetlands</i>								
66		Update annually a tracking report on gains and losses on wetlands state-wide. Every five years (2010, 2015, etc) report on trends and patterns for the previous five years. (WT-SP22)	Update annually a tracking report on gains and losses on wetlands state-wide. Every five years (2010, 2015, etc) report on trends and patterns for the previous five years. (WT-SP22)	LVPL 9/11/15	JL (9/17)	Laura Lapierre - 490-6177	Manager: Jackie Leclair - 1549 Tech: Beth Alafat - 1399				
67		Continue to participate in the NEBAWWG biological monitoring and assessment effort.	Continue to participate in the NEBAWWG biological monitoring and assessment effort.	LVPL 9/11/15	JL (9/17)	Laura Lapierre - 490-6177	Manager: Jackie Leclair - 1549 Tech: Beth Alafat - 1399				
68		Continue implementing the wetlands component of Comprehensive Surface Water Monitoring Strategy. (WT-4)	Continue implementing the wetlands component of Comprehensive Surface Water Monitoring Strategy. (WT-4)	LVPL 9/11/15	JL (9/17)	Laura Lapierre - 490-6177	Manager: Jackie Leclair - 1549 Tech: Beth Alafat - 1399				
69		Participate in annual meeting with EPA to discuss progress of the state wetland program, WPDG's , and Wetland Program Plan.	Participate in annual meeting with EPA to discuss progress of the state wetland program, WPDG's , and Wetland Program Plan.	LVPL 9/11/15	JL (9/17)	Laura Lapierre - 490-6177	Manager: Jackie Leclair - 1549 Tech: Beth Alafat - 1399				
70		Support the Region 1 wetland program priority in 2016 and 2017: Ensure that wetland complexes of high ecological value, blocks of unfragmented habitat, and/or areas that provide resilience for wetland impacts from climate change are protected, and that natural stream flow regimes and riparian corridors are maintained and connected to protect aquatic resources across New England.	Support the Region 1 wetland program priority in 2016 and 2017: Ensure that wetland complexes of high ecological value, blocks of unfragmented habitat, and/or areas that provide resilience for wetland impacts from climate change are protected, and that natural stream flow regimes and riparian corridors are maintained and connected to protect aquatic resources across New England.	LVPL 9/11/15	JL (9/17)	Laura Lapierre - 490-6177	Manager: Jackie Leclair - 1549 Tech: Beth Alafat - 1399				
		<i>Lake Champlain</i>	<i>Lake Champlain</i>				Senior Program Manager: Mel Coté - 1553				
71		On August 15, 2015, USEPA released the Draft Lake Champlain TMDL Phase I Implementation Plan (link below) with the public comment period through September 15, 2015. The final plan is due December 2015, and the link may be updated then. http://www.watershedmanagement.vt.gov/erp/champlain/docs/Ph%201_plan_Version_4.pdf#zoom=100 Following EPA issuance of the Lake Champlain TMDL, proceed with implementation consistent with the schedule included in Vermont's Phase 1 Plan (to be made final in early 2016)	Continue Lake Champlain TMDL implementation consistent with the schedule and actions included in the 2016 Phase 1 Plan.	MS; 12/10/15	JH 12/17	Kari Dolan - 490-6113	Manager: Johanna Hunter -1041; Tech MaryJo Feuerbach - 1587		Contact name changed to Kari Dolan	MLB - 12/2/16	

		<i>Emergency Preparedness</i>	<i>Emergency Preparedness</i>				Senior Program Manager: Carol Tucker -1221			
11		EPA will continue to work with Vermont on Homeland Security and emergency response readiness issues through routine, day-to-day coordination and the existing Regional Response Team mechanism. DEC will help EPA understand the role of other Vermont state and local agencies regarding emergency response readiness. This will be accomplished by facilitating meetings and using other mechanisms to introduce EPA emergency response staff and managers to their new Vermont counterparts.	EPA will continue to work with Vermont on Homeland Security and emergency response readiness issues through routine, day-to-day coordination and the existing Regional Response Team mechanism. DEC will help EPA understand the role of other Vermont state and local agencies regarding emergency response readiness. This will be accomplished by facilitating meetings and using other mechanisms to introduce EPA emergency response staff and managers to their new Vermont counterparts.	TJC, 9/9/2015	CT 12/15/15	Tim Cropley - 249-5346	Managers: Bill Lovely -1240; Ted Bazenas -1230			
		<i>RCRA Training & Meetings</i>	<i>RCRA Training & Meetings</i>			Marc Roy - 522-0275	Senior Program Manager: Beth Deabay -1343			
12		Attend EPA sponsored regional and national RCRA meetings and training as appropriate.	Attend EPA sponsored regional and national RCRA meetings and training as appropriate.	MR, 9/9/15	BD 9/9/15	Marc Roy-522-0275	Manager: Beth Deabay -1343 Tech: Sharon Leitch -1647			
		<i>Corrective Action Sites</i>	<i>Corrective Action Sites</i>			Marc Roy-522-0275	Senior Program Manager: Beth Deabay -1343			
13		Achieve Human Exposures Controlled Under Current Conditions at zero (0) facilities. (CA1)	Achieve Human Exposures Controlled Under Current Conditions at zero (0) facilities. (CA1)	MR, 9/9/15	BD 9/9/15	Marc Roy-522-0275	Manager: Dan Wainberg -1283, Tech: Juan Perez -1354			
14		Achieve Contaminated Ground Water Migration Under Control at zero (0) facilities. (CA2)	Achieve Contaminated Ground Water Migration Under Control at zero (0) facilities. (CA2)	MR, 9/9/15	BD 9/9/15	Marc Roy-522-0275	Manager: Dan Wainberg -1283, Tech: Juan Perez -1354			
15		Achieve site-wide Remedy Selection at zero (0) facilities.	Achieve site-wide Remedy Selection at zero (0) facilities.	MR, 9/9/15	BD 9/9/15	Marc Roy-522-0275	Manager: Dan Wainberg -1283, Tech: Juan Perez -1354			
16		Achieve Construction Complete at zero (0) facilities. (CA5)	Achieve Construction Complete at zero (0) facilities. (CA5)	MR, 9/9/15	BD 9/9/15	Marc Roy-522-0275	Manager: Dan Wainberg -1283, Tech: Juan Perez -1354			
17		Assessment of financial assurance current status for all new remedies.	Assessment of financial assurance current status for all new remedies.	MR, 9/9/15	BD 9/9/15	Marc Roy-522-0275	Manager: Dan Wainberg -1283, Tech: Juan Perez -1354			
18		Verify adequacy of financial assurance instrument for all remedies.	Verify adequacy of financial assurance instrument for all remedies.	MR, 9/9/15	BD 9/9/15	Marc Roy-522-0275	Manager: Dan Wainberg -1283, Tech: Juan Perez -1354			
		<i>LUST</i>	<i>LUST</i>			Chuck Schwer - 249-5324	Senior Program Manager: Beth Deabay - 1343			
19		<i>Not PPG eligible - funds are in separate LUST Trust Cooperative Agreement.</i>	<i>Not PPG eligible - funds are in separate LUST Trust Cooperative Agreement.</i>							
20		Contribute to the national target for reducing the percent of open sites awaiting cleanup at LUST facilities (target is 13%). Annually, reduce the number of confirmed releases not yet cleaned up by 1 percent. (ACS Code: 111 / 3.3)	Contribute to the national target for reducing the percent of open sites awaiting cleanup at LUST facilities (target is 13%). Annually, reduce the number of confirmed releases not yet cleaned up by 1 percent. (ACS Code: 111 / 3.3)	MM 9/10/2015	BD 9/9/15	Matthew Moran - 522-5729	Manager: Beth Deabay -1343 Tech: Joan Coyle -1303			
21		Contribute to the national target for annual cleanups completed of releases from leaking underground storage tanks (LUSTs) (target is 8,600). Specific number of LUST cleanups completed for Vermont in FY16 will be negotiated separately. (ACS Code: 112 / 3.3)	Contribute to the national target for annual cleanups completed of releases from leaking underground storage tanks (LUSTs) (target is 8,600). Specific number of LUST cleanups completed for Vermont in FY17 will be negotiated separately. (ACS Code: 112 / 3.3)	MM 9/10/2015	BD 9/9/15	Matthew Moran - 522-5729	Manager: Beth Deabay -1343 Tech: Joan Coyle -1303			
		<i>Objective 3.4: Strengthen Human Health and Environmental Protection in Indian Country</i>	<i>Objective 3.4: Strengthen Human Health and Environmental Protection in Indian Country</i>							
22		No specific PPA related action for the State	No specific PPA related action for the State							

No.	RO (Reopener New, Reopener Revised)	2016 PPA Priorities & Commitments List	2017 PPA Priorities & Commitments List	Approval: Initials, Date		VT DEC Contacts 802.XXX.XXXX	EPA Contacts 617.918.XXXX	Item-Specific Reopener	FY2017 Reopener Comments	Approval: Initials, Date	
				VT DEC	EPA					VT DEC	EPA
		GOAL 4: ENSURING THE SAFETY OF CHEMICALS AND PREVENTING POLLUTION	GOAL 4: ENSURING THE SAFETY OF CHEMICALS AND PREVENTING POLLUTION								
		No specific PPA related action for the State	No specific PPA related action for the State								
		Objective 4.2: Promote Pollution Prevention	Objective 4.2: Promote Pollution Prevention								
1		As a follow up to the June OES planning meeting, participate in the fall New England Pollution Prevention and Assistance Forum.	As a follow up to the June OES planning meeting, participate in the fall New England Pollution Prevention and Assistance Forum.	LM, 9/4/2015		Lynn Metcalf - 522-0469	Tom D'Avanzo 8-1801				

No.	RO (Reopener New, Reopener Revised)	2016 PPA Priorities & Commitments List	2017 PPA Priorities & Commitments List	Approval: Initials, Date		VT DEC Contacts 802.XXX.XXXX	EPA Contacts 617.918.XXXX	Item-Specific Reopener	FY2017 Reopener Comments	Approval: Initials, Date	
				VT DEC	EPA					VT DEC	EPA
		GOAL 5: PROTECTING HUMAN HEALTH AND THE ENVIRONMENT BY ENFORCING LAWS AND ASSURING COMPLIANCE	GOAL 5: PROTECTING HUMAN HEALTH AND THE ENVIRONMENT BY ENFORCING LAWS AND ASSURING COMPLIANCE								
1		Submit annual Compliance Plans containing descriptions of the state's, assistance and innovative programs, including projections for priority activities.	Submit annual Compliance Plans containing descriptions of the state's, assistance and innovative programs, including projections for priority activities.			Kim Greenwood 272-0423	Tom D'Avanzo 8-1801				
2		Submit annual 2015 End of Year report on Compliance monitoring and Enforcement accomplishments, activities and results.	Submit annual 2015 End of Year report on Compliance monitoring and Enforcement accomplishments, activities and results.	GK; 12/10/2015	td 12/18/15	Kim Greenwood 272-0423	Tom D'Avanzo 8-1801				
3		Serve as an EPA contact for development of any plans for the state's assistance and innovation programs.	Serve as an EPA contact for development of any plans for the state's assistance and innovation programs.	CH; 12/10/2105	td 12/18/15	Carey Hengstenberg - 595-1632	Tom D'Avanzo 8-1801				
4		At end of year 2014, provide a discussion on any plans that might have developed under Item 137, or provide a negative declaration.	At end of year 2014, provide a discussion on any plans that might have developed under Item 137, or provide a negative declaration.			Carey Hengstenberg - 595-1632	Tom D'Avanzo 8-1801				
5		Identify/address/resolve HPVs in accordance with EPA's Timely and Appropriate Enforcement Response to High Priority Violators (the HPV policy), August 2014. Inform the EPA Region 1 liaison in person, by phone, or by email within 45 days of identifying/addressing/ resolving an HPV.	Identify/address/resolve HPVs in accordance with EPA's Timely and Appropriate Enforcement Response to High Priority Violators (the HPV policy), August 2014. Inform the EPA Region 1 liaison in person, by phone, or by email within 45 days of identifying/addressing/ resolving an HPV.	JWakefield 9/9/15	JChow 9/9/15	John Wakefield - 279-5674	Manager: Steve Rapp - 1551				
7		Enter/send information necessary to satisfy the inspection, testing, compliance monitoring, and enforcement minimum data requirements (MDRs) to EPA's national data systems of record, every 60 days, or as specified in program guidance. For a list of CAA required data elements, see http://www2.epa.gov/compliance/guidance-minimum-data-requirements-mdrs-caa-stationary-sources-compliance For a list of RCRA required data elements, see: http://www.epa.gov/waste/infosources/data/index.htm For a list of CWA required data elements, see: http://www.gpo.gov/fdsys/pkg/FR-2013-07-30/pdf/2013-17551.pdf TABLE 2—REQUIRED NPDES DATA	Enter/send information necessary to satisfy the inspection, testing, compliance monitoring, and enforcement minimum data requirements (MDRs) to EPA's national data systems of record, every 60 days, or as specified in program guidance. For a list of CAA required data elements, see http://www2.epa.gov/compliance/guidance-minimum-data-requirements-mdrs-caa-stationary-sources-compliance For a list of RCRA required data elements, see: http://www.epa.gov/waste/infosources/data/index.htm For a list of CWA required data elements, see: http://www.gpo.gov/fdsys/pkg/FR-2013-07-30/pdf/2013-17551.pdf TABLE 2—REQUIRED NPDES DATA	JWakefield 9/9/15	JChow 9/9/15	John Wakefield - 279-5674 Amber van Zuilen 490-6111	Manager: Steve Rapp 1551 Manager: Mary Jane O'Donnell 1371 Manager: Denny Dart 1850				
8	RR	By November 30, 2015 submit the FY15 annual End-of-Year reports for CAA, CWA and RCRA CMS accomplishments. Include reporting on alternative plans, where applicable.	By November 30, 2016 submit the FY16 annual End-of-Year reports for CAA, CWA and RCRA CMS accomplishments. Include reporting on alternative plans, where applicable.	JWakefield 9/9/15	JChow 9/9/15	John Wakefield - 279-5674 Amber van Zuilen 490-6111	Manager: Steve Rapp 1551 Manager: Mary Jane O'Donnell 1371 Manager: Denny Dart 1850	Based on discussions with VTDEC in Sept 2016, edits to this P&C item were proposed to more accurately reflect end of year reporting requirements.	By November 30, 2016 submit complete the FY16 annual end-of-year reporting End-of-Year reports for CAA, CWA and RCRA CMS accomplishments. Include reporting on alternative plans, where applicable.	AVZ 12/2/2016 JW 12/5/2016	JChow 11/21/16
6		As soon as possible in the year, but no later than July 30, 2016, submit a draft FY17 Alternative Compliance Monitoring Strategy. This is only required if the state is seeking flexibility under an alternative CMS plan. By September 30, 2016 submit a final FY17 Compliance Monitoring Plans for CAA, RCRA and CWA containing descriptions of the state's compliance program including projections for inspections and other priority activities. See the most recent OECA National Program Manager's Guidance Addendum and the CAA, CWA and RCRA Compliance Monitoring Strategies. The Compliance Monitoring Plans for FY16 are prepared and finalized in FY15. http://www2.epa.gov/planandbudget/national-program-manager-guidances http://www.epa.gov/compliance/resources/policies/monitoring/	As soon as possible in the year, but no later than July 30, 2017, submit a draft FY18 Alternative Compliance Monitoring Strategy. This is only required if the state is seeking flexibility under an alternative CMS plan. By September 30, 2017 submit a final FY18 Compliance Monitoring Plans for CAA, RCRA and CWA containing descriptions of the state's compliance program including projections for inspections and other priority activities. See the most recent OECA National Program Manager's Guidance Addendum and the CAA, CWA and RCRA Compliance Monitoring Strategies. The Compliance Monitoring Plans for FY17 are prepared and finalized in FY16. http://www2.epa.gov/planandbudget/national-program-manager-guidances http://www.epa.gov/compliance/resources/policies/monitoring/	JWakefield 9/9/15	JChow 9/9/15	John Wakefield - 279-5674 Amber van Zuilen 490-6111	Manager: Steve Rapp 1551 Manager: Mary Jane O'Donnell 1371 Manager: Denny Dart 1850				
9		By September 30, 2016 report on progress in addressing any recommendations identified by the State Review Framework (SRF).	By September 30, 2017 report on progress in addressing any recommendations identified by the State Review Framework (SRF).	JWakefield 9/9/15	JChow 9/9/15	John Wakefield - 279-5674 Amber van Zuilen 490-6111 Kim Greenwood - 272-0423	Manager: Steve Rapp 1551 Manager: Mary Jane O'Donnell 1371 Manager: Denny Dart 1850				

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				VT DEC	EPA					VT DEC	EPA
		EVALUATION, REPORTING & QUALITY ASSURANCE	EVALUATION, REPORTING & QUALITY ASSURANCE								
		<i>Re-Opener Clause</i>	<i>Re-Opener Clause</i>				Senior Program Manager: Kristi Rea - 1595				
1		The Regional Office will strive to honor the spirit of the PPA. In keeping with this spirit the Region 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.	The Regional Office will strive to honor the spirit of the PPA. In keeping with this spirit the Region 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.	CAH, 9/9/15	MAO 9/11/15	Carey Hengstenberg -595-1632	Kristi Rea -1591 & Michael Ochs-1133				
		<i>Performance Partnership</i>	<i>Performance Partnership</i>				Senior Program Manager: Kristi Rea - 1595				
2		A process for jointly evaluating and reporting progress and accomplishments under the workplan must be developed and described in the workplan. The process must be based on a negotiated schedule. (40CFR35.115).	A process for jointly evaluating and reporting progress and accomplishments under the workplan must be developed and described in the workplan. The process must be based on a negotiated schedule. (40CFR35.115).	CAH, 9/9/15	MAO 9/11/15	Carey Hengstenberg -595-1632	Kristi Rea -1591 & Michael Ochs-1133				
3		An annual written progress report must be submitted within 90 days after the end of the annual grant period. (40CFR35.115, 40CFR31.40).	An annual written progress report must be submitted within 90 days after the end of the annual grant period. (40CFR35.115, 40CFR31.40).	CAH, 9/9/15	MAO 9/11/15	Carey Hengstenberg -595-1632	Kristi Rea -1591 & Michael Ochs-1133				
		<i>QMP QAPP</i>	<i>QMP QAPP</i>				Senior Program Manager: John Smaldone -8312				
4		Continue to implement the State Quality Management Plan (QMP) and submit an Annual Quality System Status Report to the EPA NE Quality Assurance Unit documenting progress, activities, and status of the organization's quality system. The report will be submitted within 90 days of the end of the Federal Fiscal Year (by January 1st) and is comprised of three parts: Part A, Part B and Part C. Part A includes quality assessments conducted during the past year; identification of areas for improvement within the system; and descriptions, as applicable, of other relevant quality-related topics such as training, development of guidance, and best practices. Part B summarizes changes made to the QMP. Part C updates the State Quality Assurance Project Plan (QAPP) inventory list. This includes Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary data sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.	Continue to implement the State Quality Management Plan (QMP) and submit an Annual Quality System Status Report to the EPA NE Quality Assurance Unit documenting progress, activities, and status of the organization's quality system. The report will be submitted within 90 days of the end of the Federal Fiscal Year (by January 1st) and is comprised of three parts: Part A, Part B and Part C. Part A includes quality assessments conducted during the past year; identification of areas for improvement within the system; and descriptions, as applicable, of other relevant quality-related topics such as training, development of guidance, and best practices. Part B summarizes changes made to the QMP. Part C updates the State Quality Assurance Project Plan (QAPP) inventory list. This includes Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary data sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.	JN; 12/10/15	JRS- 9/3/15	Jean Nicolai -585-4888	Lead: John Smaldone - 8312 Tech: Ann Jefferies - 8373 & Bryan Hogan - 8634				
5		Maintain accreditation for the DEC laboratory and follow up promptly on any action items resulting from NELAP assessments of the laboratory.	Maintain accreditation for Vermont Agriculture and Environmental laboratory to support DEC laboratory needs and follow up promptly on any action items resulting from NELAP assessments of the laboratory.	DN - 1/4/2016	JRS- 12/18/15	VAEL Chemistry Supervisor: Dan Needham - 585-9808	Senior Program Manager: John Smaldone -8312 Tech: Ann Jefferies -8373				
6		Review the State QMP and summarize changes made to the QMP in Part B of the Annual Quality system Status Report.	Review the State QMP and summarize changes made to the QMP in Part B of the Annual Quality system Status Report.	JN; 12/10/15	JRS- 9/3/15	Jean Nicolai 585-4888	Manager: John Smaldone - 8312 Tech: Ann Jefferies - 8373 & Bryan Hogan - 8634				
7		Update the State Quality Assurance Quality Assurance Project Plan inventory list, in Part C of the Annual Quality System Status Report, with new and active QAPPs, including Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.	Update the State Quality Assurance Quality Assurance Project Plan inventory list, in Part C of the Annual Quality System Status Report, with new and active QAPPs, including Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.	JN; 12/10/15	JRS- 9/3/15	Jean Nicolai 585-4888	Manager: John Smaldone - 8312 Tech: Ann Jefferies - 8373 & Bryan Hogan - 8634				

APPENDIX B
Vermont DEC 2016-2018 Strategic Plan



Department of Environmental Conservation
Strategic Plan 2016 – 2018

January 11, 2016

Amended June 9, 2016



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Department Mission

To preserve, enhance, restore, and conserve Vermont's natural resources, and protect human health for the benefit of this and future generations.

Department Strategic Planning Process

We initiated our planning process with the Department's executive management team in May 2015, developing a set of high-level strategic priorities for the Department. The draft plan was reviewed and further refined by management and supervisors over the course of the following six months. During the planning process, Department management focused on incorporating Results Based Accountability (RBA) into our plan to measure how well the strategies adopted by this plan are working. This is a streamlined approach, presented in simple language and includes overall population-based indicators along with more specific program-level performance measures. We plan to track progress on our indicators and performance measures annually and make adjustments to the plan, as necessary to achieve our performance targets.

Population-Based Outcomes & Indicators

Clean Air

- Total greenhouse gas (GHG) emissions per capita
- Total concentration of mobile source air pollutants
- Total number of days with air quality alerts

Clean Water

- Percent of Vermont's inland waters that meet water quality standards
- Percent of Lake Champlain that meets water quality standards meeting water quality standards
- Total phosphorus loading to Lake Champlain from Vermont sources (metric tons/year)

Healthy and Safe Communities

- Disposal rate of municipal solid waste (lbs./person/day)
- Total number of acres that has been or will be cleaned up/redeveloped based on sites enrolled in the Brownfields Program
- Percent of communities with asset management plans related to environmental infrastructure
- Annual number of dams reporting an upgrade in condition
- Percent of land in Vermont preserved to reduce flood and fluvial erosion hazards
- Percent of public water systems in compliance with health based standards

Efficient and Effective Government

- Number of Lean (process improvement) events successfully completed across state government

Department of Environmental Conservation Goals (2016 - 2018)

Goal 1: Reduced public health exposure and risk from air and climate pollution

- A. Strategy: Support clean and efficient wood burning

Performance Measure 1: Number of uncertified wood stoves replaced with new certified units

Performance Measure 2: Percentage of monitoring locations where particulate Concentration trends (PM2.5) are decreasing during the heating season

- B. Strategy: Advance clean car initiatives, and other programs to reduce mobile source emissions

Performance Measure 1: Number of plug-in hybrid and all-electric vehicles registered

Performance Measure 2: Proportion of air pollutants from mobile sources based on EPA's National Emissions Inventory (NEI) 3-year schedule

Performance Measure 3: Number of charging stations funded in part by the Department

Goal 2: All Vermonters have safe drinking water

- A. Strategy: Ensure communities have technical and managerial capability to provide long-term public health protection through public drinking water systems

Performance Measure 1: Percent of drinking water systems with asset management plans for their water systems

Performance Measure 2: Percent of public water systems in compliance with health-based standards

- B. Strategy: Promote public trust as an integral part of groundwater management and protection

Performance Measure 1: Number of towns with groundwater protection included in their town plans.

Performance Measure 2: Cumulative number of groundwater samples collected analyzed for arsenic, radionuclides, nitrates, manganese, and other emerging contaminants.

Performance Measure 3: Annual percentage of wastewater systems permitted by the On-site Program since 1989 that have not failed.

Goal 3: Materials are sustainably managed and properties returned to productive use

- A. **Strategy:** Ensure that all communities have approved Solid Waste Implementation Plans to fully implement Universal Recycling Law

Performance Measure 1: Number of Solid Waste Planning entities with approved Solid Waste Implementation Plans

Performance Measure 2: Amount of public and private funding dedicated toward Universal Recycling Infrastructure

- B. **Strategy:** Secure adequate funding to support and promote superfund cleanups and Brownfields redevelopment

Performance Measure 1: Amount of funds available each year for Brownfields

Performance Measure 2: Amount of funds available each year and Superfund cleanups

Performance Measure 3: Amount of funds leveraged for Brownfields redevelopment

Goal 4: Protect, maintain, enhance and restore Vermont's surface waters

- A. **Strategy:** Protect our surface waters through flood resiliency and resource protection; protect and restore wetlands, lakes, floodplains and rivers through conservation and protection strategies

Performance Measure 1: Number of acres protected

Performance Measure 2: Number of new reclassifications or designations for protection

- B. **Strategy:** Maintain water quality and resources through regulatory programs and technical assistance

Performance Measure 1: Percent wastewater treatment facility permit applications backlogged

Performance Measure 2: Number of wastewater compliance and inspection-related site visits

Performance Measure 3: Number of stormwater compliance and inspection-related site visits

Performance Measure 4: Number of entities receiving technical assistance

- C. Strategy: Enhance flow protection at existing wetlands, shorelands and rivers projects

Performance Measure 1: Number of projects with enhanced protection

Performance Measure 2: Number of river enhancement projects

- D. Strategy: Restore water quality through timely implementation of Total Maximum Daily Loads (TMDLs) for Lake Champlain, Long Island Sound, Lake Memphremagog, and Lake Carmi and the Vermont Clean Water Act (Act 64)

Performance Measure 1: Funding awarded for priority projects

Performance Measure 2: Percent of required pollutant reduction achieved on VTrans highways and related facilities

Performance Measure 3: Percent of required pollutant reduction achieved on developed land (non-road)

Goal 5: Manage infrastructure to protect the health and safety of Vermonters

- A. Strategy: Reduce potential for dam failure risks

Performance Measure 1: Annual number of dams rated in poor condition that have been upgraded to fair or good condition

Performance Measure 2: Annual number of dams in fair condition that have been upgraded to good condition

Goal 6: Develop and maintain a culture of continuous process improvement

- A. Strategy: Increase number of electronic transactions

Performance Measure 1: percent of submittals received electronically (permit applications, reporting and certification programs)

Performance Measure 2: Number of unique visitors on the Department's main web page

- B. Strategy: Implement Permit Process Improvement plan to increase transparency, provide opportunities for public input earlier in decision making, timely decisions

Performance Measure 1: Number of different public notice processes used by the Department

C. Strategy: Develop and apply diversified portfolio of Lean tools and evaluate effectiveness.

Performance Measure 1: Cumulative number of Lean events initiated by the Department

Performance Measure 2: Percent of major Lean projects implemented by the Department

Performance Measure 3: Percent of Department employees who have received formal training in Lean principles and techniques

APPENDIX C

USEPA's 2014-2018 Strategic Plan

EPA will inform VT DEC if there are any substantive changes or amendments to the current 2014-2018 EPA Strategic Plan. USEPA's FY 2014-2018 Strategic Plan presents five strategic goals for advancing USEPA's environmental and human health mission outcomes, as well as, five cross-cutting fundamental strategies. The cross-cutting strategies set explicit expectations for changing the way USEPA approaches its work. The strategies are geared to inform the work of all the USEPA programs and to help meet the environmental challenges faced at this time. The goals and objectives are listed here, followed by the cross-cutting strategies. For more details, as well as strategic measures that have been identified to track progress, please see the full plan at www.epa.gov/planandbudget/strategicplan.html.

Goal 1: Addressing Climate Change and Improving Air Quality

Reduce greenhouse gas emissions and develop adaptation strategies to address climate change and protect and improve air quality

Objectives:

- **Address Climate Change.** *Minimize the threats posed by climate change by reducing greenhouse gas emissions and taking actions that help to protect human health and help communities and ecosystems become more resilient to the effects of climate change*
- **Improve Air Quality.** *Achieve and maintain health and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants*
- **Restore the Ozone Layer.** *Restore and protect the earth's stratospheric ozone layer and protect the public from harmful effects of ultraviolet (UV) radiation*
- **Reduce Unnecessary Exposure to Radiation.** *Minimize releases of radioactive material and be prepared to minimize exposure through response and recovery actions should unavoidable releases occur.*

Goal 2: Protecting America's Waters

Protect and restore waters to ensure that drinking water is safe and sustainably managed, and that aquatic ecosystems sustain fish, plants, wildlife, and other biota, as well as economic, recreational, and subsistence activities.

Objectives:

- **Protect Human Health.** *Achieve and maintain standards and guidelines protective of human health in drinking water supplies, fish, shellfish, and recreational waters, and protect and sustainably manage drinking water resources.*
- **Protect and Restore Watersheds and Aquatic Ecosystems.** *Protect, restore, and sustain the quality of rivers, lakes, streams, and wetlands on a watershed basis, and sustainably manage and protect coastal and ocean resources and ecosystems.*

Goal 3: Cleaning Up Communities and Advancing Sustainable Development

Clean up communities, advance sustainable development, and protect disproportionately impacted low-income and minority communities. Prevent releases of harmful substances and clean up and restore contaminated areas.

Objectives:

- **Promote Sustainable and Livable Communities.** *Support sustainable, resilient, and livable communities by working with local, state, tribal, and federal partners to promote smart growth, emergency preparedness and recovery planning, redevelopment, and the equitable distribution of environmental benefits.*
- **Preserve Land.** *Conserve resources and prevent land contamination by reducing waste generation and toxicity, promoting proper management of waste and petroleum products, and increasing sustainable materials management.*
- **Restore Land.** *Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites for reuse.*
- **Strengthen Human Health and Environmental Protection in Indian Country.** *Directly implement federal environmental programs in Indian country and support federal program delegation to tribes. Provide tribes with technical assistance and support capacity development for the establishment and implementation of sustainable environmental programs in Indian country.*

Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution

Reduce the risk and increase the safety of chemicals and prevent pollution at the source.

Objectives:

- **Ensure Chemical Safety.** *Reduce the risk and increase the safety of chemicals that enter our products, our environment, and our bodies.*

- **Promote Pollution Prevention.** *Conserve and protect natural resources by promoting pollution prevention and the adoption of other sustainability practices by companies, communities, governmental organizations, and individuals.*

Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

Protect human health and the environment through vigorous and targeted civil and criminal enforcement. Use Next Generation Compliance strategies and tools to improve compliance with environmental laws.

Objective:

- **Enforce Environmental Laws to Achieve Compliance.** *Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities to achieve compliance. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide. Use Next Generation Compliance strategies and tools to improve compliance and reduce pollution.*

USEPA Cross-Cutting Fundamental Strategies

USEPA has developed a set of cross-cutting strategies that stem from Administrator Gina McCarthy's priorities and are designed to fundamentally change how USEPA works both internally and externally to achieve the mission outcomes articulated under the five strategic goals.

These cross cutting strategies are:

Working Toward a Sustainable Future

Advance sustainable environmental outcomes and optimize economic and social outcomes through Agency decisions and actions, which include expanding the conversation on environmentalism and engaging a broad range of stakeholders.

Working to Make a Visible Difference in Communities

Align community-based activities to provide seamless assistance to communities, both urban and rural, while maximizing efficiency and results. Expand support of community efforts to build healthy, sustainable, green neighborhoods and reduce and prevent harmful exposures and health risks to children and underserved, overburdened communities.

Launching a New Era of State, Tribal, Local, and International Partnerships

Strengthen partnerships with states, tribes, local governments, and the global community that are central to the success of the national environmental protection program through consultation, collaboration, and shared accountability. Modernize the USEPA–state relationship, including revitalizing the National Environmental Performance Partnership System and jointly pursuing E-Enterprise, a transformative approach to make environmental information and data more

accessible, efficient, and evidence-based through advances in monitoring, reporting, and information technology.

Embracing USEPA as a High-Performing Organization

Maintain and attract USEPA's diverse and engaged workforce of the future with a more collaborative work environment. Modernize our business practices, including through E-Enterprise, and take advantage of new tools and technologies. Improve the way we work as a high-performing Agency by ensuring we add value in every transaction with our workforce, our co-regulators, our partners, industry, and the people we serve.