

Water Quality Division Environmental Performance Partnership Agreement

Calendar Year 2016

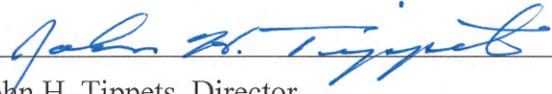


**Idaho Department of Environmental Quality
United States Environmental Protection Agency Region 10**

December 2015

Water Quality Division Environmental Performance Partnership Agreement

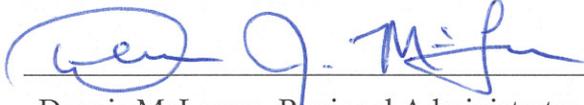
The following Performance Partnership Agreement (PPA) between the United States Environmental Protection Agency (EPA) Region 10 and the Idaho Department of Environmental Quality (DEQ) will serve as the work plan for DEQ's Water Quality Division. This PPA is effective for calendar year 2016 and covers the period from January 1 through December 31, 2016. The agreement aligns DEQ and EPA Region 10 priorities and defines expected environmental outcomes. Through this agreement, DEQ and EPA can work together more efficiently in managing Idaho's water resources.



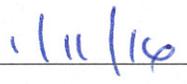
John H. Tippetts, Director
Idaho Department of Environmental Quality



Date



Dennis McLerran, Regional Administrator
US Environmental Protection Agency, Region 10



Date

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Introduction

The United States Environmental Protection Agency (EPA) and states share responsibility for environmental protection. This Performance Partnership Agreement (PPA) describes how the Idaho Department of Environmental Quality (DEQ) Water Quality Division and EPA Region 10 will work together to protect Idaho's water quality.

The goal of a PPA is to bring more flexibility, accountability, and innovation into the state and federal relationship. In particular, these agreements are intended to increase environmental protection by focusing on overall environmental goals and results of government programs. In the PPA process, DEQ and EPA discuss environmental conditions and program needs, agree on priorities, develop approaches to address priorities, determine roles and responsibilities, and choose program measures.

This agreement details how DEQ and EPA will work together to accomplish common water quality goals. The two agencies will continue to focus on integrating key program areas that form the foundation of Idaho's Water Quality Program. Core programs include safe drinking water, ground water, water quality standards, water quality monitoring and assessment, water body and watershed restoration, wastewater and drinking water infrastructure, and National Pollutant Discharge Elimination System (NPDES) permits and compliance. DEQ is the lead agency for most of these programs, except for NPDES in which EPA is the lead. This year DEQ will continue the process of developing an application for NPDES delegation. Each Water Quality Program component identifies the expected environmental results as well as the DEQ and EPA work commitments to be completed during calendar year (CY) 2016.

To present a comprehensive overview of DEQ's efforts to protect water quality, this PPA describes additional DEQ Water Quality Division activities funded by other federal and nonfederal funds. In CY 2016, federal grant work plans will continue to focus on optimizing the use of DEQ Water Quality Division staff to perform more critical water quality work in-house.

Strategic Priorities

EPA and DEQ were guided in these PPA negotiations by their respective strategic plans and priorities. DEQ and EPA strategic plans are available for review on each agency's website. These strategic plans are broad-based and address more than just water quality strategies and priorities. Figure 1 below illustrates the relationship of DEQ and EPA planning processes, including strategic priorities, to the PPA. The PPA offers an opportunity to identify common ground among these priorities and for the agencies to identify opportunities to work collaboratively on some priorities. The following sections describe each agency's strategic priorities. These sets of priorities establish the framework for developing this PPA. Specifically, this PPA incorporates EPA's priorities and targets that correspond to DEQ's priorities and objectives.

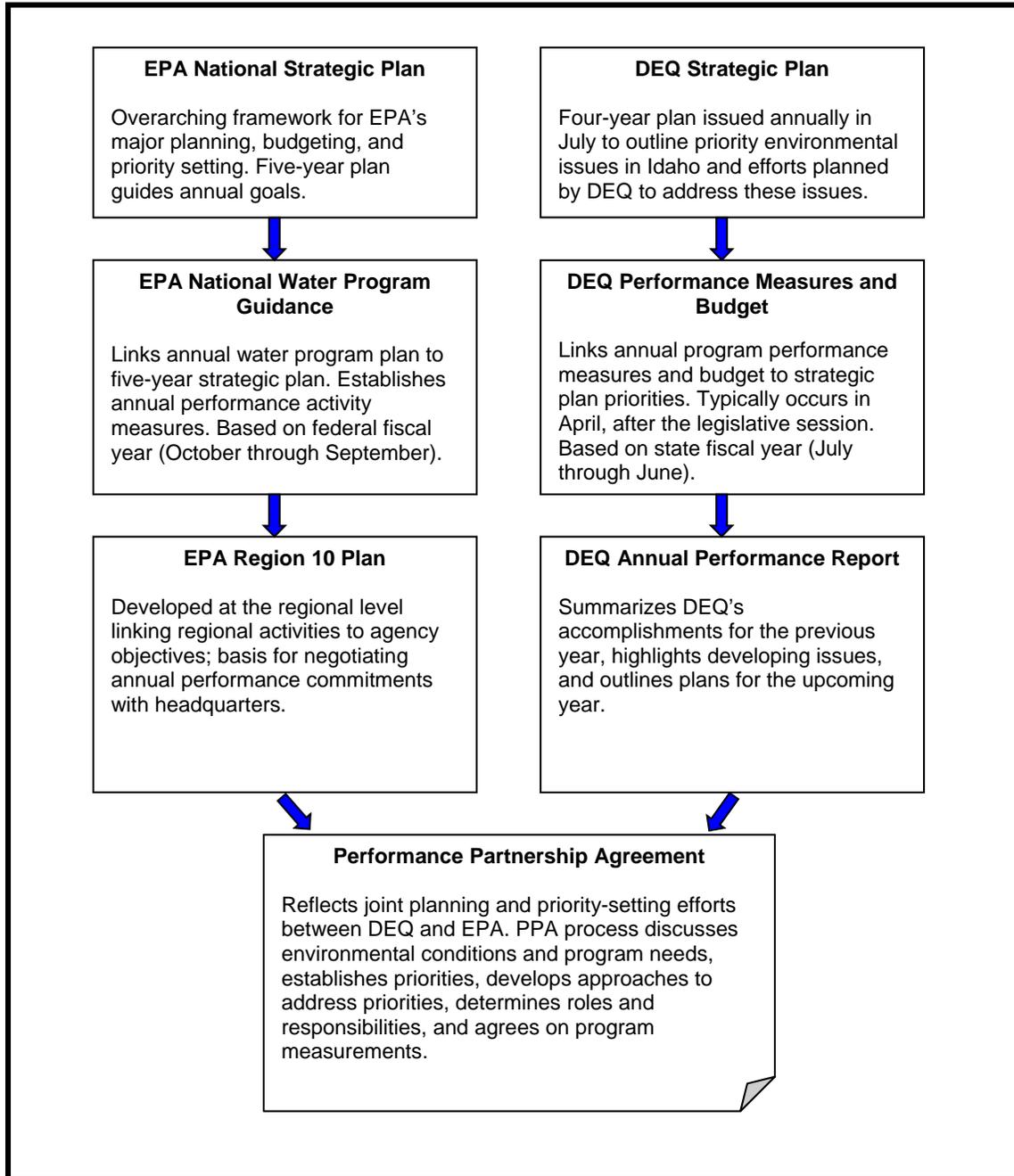


Figure 1. Relationship of DEQ and EPA planning processes to the Performance Partnership Agreement.

DEQ's Strategic Priorities

DEQ has adopted a strategic plan for 2016 through 2019, available at deq.idaho.gov/media/60176852/deq-strategic-plan-16-19.pdf. DEQ's mission is to protect human health and preserve the quality of Idaho's air, land, and water for use and enjoyment today and in the future. DEQ uses environmental outcomes as one method to evaluate the effectiveness of its programs. Specific Water Quality Division objectives include the following:

- Monitor and assess water quality conditions to determine compliance with standards and support of beneficial uses.
- Complete reviews, guidance, and plans for improving and maintaining water quality.
- Implement pollution reduction actions needed to meet water quality standards and support beneficial uses.
- Develop the Idaho Pollutant Discharge Elimination System program.
- Ensure customers served by regulated public water systems are receiving safe and reliable drinking water.
- Assist public water system owners in protecting their drinking water sources from contamination.
- Provide financial assistance to public water systems for facility improvements and source water protection.

EPA's Strategic Priorities

The EPA National Water Program Guidance provides an overarching document of national goals, priorities, and performance measures aimed at making significant progress toward protecting human health and improving water quality. This national program guidance is augmented by the National Program Manager Guidance for enforcement activities in all media. Both documents can be found at <http://www2.epa.gov/planandbudget>.

EPA's fiscal year 2014–2018 strategic plan, available at <http://www.epa.gov/planandbudget/strategicplan>, captures national goals and describes priorities, strategies, and expectations. EPA Region 10 strives to integrate state and regional priorities with EPA's national strategic planning objectives. The 2011–2015 strategy for EPA Region 10 is available at <http://yosemite.epa.gov/R10/extaff.nsf/reports/regional-strategy>.

EPA Region 10's strategy aligns with the EPA administrator's five strategic goals and four cross-agency strategies, several of which are directly related to this PPA. For example, the goal, Protecting America's Waters, and the cross-agency strategy, Working Toward a Sustainable Future, include work activities pertaining to water quality. EPA's commitment to partnering and finding workable solutions through the PPA process is articulated in the Launching a New Era of State, Tribal, Local, and International Partnerships cross-agency strategy.

EPA Region 10 identifies the following priorities specific to Idaho water quality for 2016:

- Work with DEQ and Idaho interests on the state's development of NPDES authorization rules and guidance.
- Work with DEQ to build Idaho's capacity for NPDES implementation, through training and collaborative work in permits and inspection efforts.
- Coordinate with DEQ on water quality standards litigation and rulemakings.

- Work with DEQ to revise the human health criteria for toxics in response to EPA’s disapproval action.
- Issue draft NPDES permits and §401 certifications for the Boise River.
- Issue draft NPDES permits and §401 certifications for the Mid-Snake River.
- Work with DEQ towards implementing EPA’s §303(d) program vision.
- Work with DEQ to establish protocols for identifying existing uses for man-made waters.
- Work with DEQ and other state agencies to effectively coordinate the implementation of several important general NPDES permits.
- Work with DEQ to implement the Revised Total Coliform Rule for the drinking water program.
- Coordinate with DEQ on the “Making a Visible Difference” project that EPA has initiated with Nampa to focus on stormwater program outreach to the Hispanic community.

General Water Quality Agreements

Information and Document Sharing Expectations

DEQ will submit annual reports to EPA that provide data on the measures indicated in the PPA, unless this information is provided in grant reports. DEQ and EPA will inform each other regarding correspondence about grants, agreements, or products or services rendered from other local, state, and federal agencies or private entities that concern activities covered under this agreement.

Training and Technical Assistance

Each agency, within its resource limitations, will provide training and technical assistance to the other agency upon request.

Joint Evaluation of Performance

Unless stipulated otherwise in the PPA or individual grant conditions, DEQ and EPA will perform semiannual reviews for all PPA commitments. These reviews are planned for midyear in May 2016 and near the conclusion of the annual PPA. This joint evaluation of performance will discuss program accomplishments as measured against work plan commitments, existing and potential problem areas, and suggestions for improvement. As a result of these performance evaluations, DEQ and EPA will collaborate on preparing brief progress reports covering their respective commitments in the PPA.

Roles and Responsibilities

Roles and responsibilities for EPA and DEQ are specified in the Program Commitment sections of this PPA.

Terms and Conditions

DEQ and EPA will follow all terms and conditions outlined in the operating agreements, yearly grant agreements, and federal and state statutes and regulations. For the purposes of quantification of effort, 2,080 person hours is one *full-time equivalent* (FTE), also known as one *work year*. As required by 40 CFR 35, the following federal sources of funding have been identified in this PPA:

- | | |
|--|--|
| • Surface Water §106 | Reuse permit program; NPDES inspections/capacity development/certifications; wastewater plans/specifications; monitoring initiatives |
| • Ground Water §106 | Ground Water Program-related activities |
| • Nonpoint Source (NPS) §319 | TMDL; NPS; restoration and management plans |
| • §604(b)/205(j) | On-Site Wastewater Program |
| • Total Maximum Daily Load (TMDL) grant | Key watershed TMDL projects |
| • State and Tribal Assistance Grants (STAG) administration 3% | Public works construction oversight |
| • Drinking Water—Public Water System Supervision (PWSS) | Drinking Water Program administration |
| • Drinking Water State Revolving Fund (SRF) capitalization grant | Drinking Water Loans; Loan Program administration; and eligible set-aside activities |
| • Clean Water State Revolving Fund (CWSRF) capitalization grant | Wastewater Loans and Loan Program administration |

Outcomes

Environmental outcomes are described in the individual program sections.

Component 1. Surface Water Assessment and Protection Programs

Program Goal

The goal of DEQ's Surface Water Program is to restore impaired water bodies to conditions supporting designated and existing beneficial uses. DEQ also works to improve surface water quality in areas with endangered species issues. These goals are accomplished through the following activities: monitoring and data collection, assessment, Integrated Report publication (formerly called the §305(b) report and §303(d) list), water quality standards development, and total maximum daily load (TMDL) development. Monitoring and data collection are proposed to continue in CY 2016 at levels similar to CY 2015 but with expanded monitoring to support TMDL 5-year reviews.

Program Activities

Where possible, complete remaining TMDLs per the 2002 Idaho TMDL Settlement Agreement. Complete 5-year reviews of completed TMDLs. Continue monitoring and assessment activities as budget allows; develop water quality standards. Revise Idaho's Water Quality Trading Guidance and Lower Boise Trading Framework as necessary. Finalize the Mixing Zone Guidance.

Program Contacts

Surface Water Program Manager, DEQ, (208) 373-

David Croxton, EPA, (206) 553-6694

Angela Chung, EPA, (206) 553-6511

Program Commitments

Priorities

- Complete 173 TMDLs (see list below). TMDLs covering waters identified in the 2002 Settlement Agreement will be noted in the submittal letter to EPA.
 - Middle Fork Salmon/Chamberlain (Crooked River)
 - Upper North Fork Clearwater (Lake Creek)
 - Palouse
 - Lower Boise River Tributaries Total Phosphorus
 - Brownlee (Weiser Flat bacteria)
 - Bruneau (temperature)
 - Upper Snake Rock (Mud Creek)
 - Curlew Valley
 - Upper Salmon
 - Willow Creek

- Medicine Lodge
- Little Lost River (addendum)
- Designated management agencies (DMAs) with watershed advisory group (WAG) input will develop implementation plans as their budget allows to implement approved TMDLs.
- Complete six EPA-funded TMDL 5-year reviews for CY 2016 (see list below) and coordinate monitoring activities to support CY 2016 and CY 2017 reviews.
 - Pend Oreille Lake Tributaries and Cocolalla Lake
 - Jim Ford and Tributaries
 - Boise-Mores Creek
 - Big Wood
 - Bear River
 - Upper and Lower Henry’s Fork
 - Identify priority watersheds for restoration, consistent with EPA’s TMDL vision (Water Quality Measure 27).
- Coordinate with WAGs, EPA, and DMAs regarding 5-year reviews as appropriate.
- Coordinate monitoring activities with other state, federal, and private entities. Provide necessary information, including monitoring data, to demonstrate meeting EPA National Management Measures (SP-10 and SP-12).
- Continue to update and modify water quality standards as needed.

Outcome

Surface water assessment and protection outcomes will increase the percentage of waters that support beneficial uses and decrease the percentage of waters that do not support beneficial uses.

Total Maximum Daily Loads

1.1.a Restore beneficial uses and meet water quality standards in water quality limited water bodies.

Approach

Complete remaining subbasin assessments and TMDLs pursuant to the 2002 Idaho TMDL Settlement Agreement. See Outputs item (a) below.

Outputs

- a. Complete 173 TMDLs (see list above). Settlement TMDLs will be noted in the submittal letter to EPA.
- b. Share prepublic comment period drafts of TMDLs with EPA.
- c. Share draft of the TMDL data entry form with EPA prior to final TMDL submittal.
- d. Continue to perform pre- and post-TMDL monitoring visits, as the budget allows, to support TMDL development and adaptive management.
- e. Continue effort to complete Lower Boise River (LBR) tributary TMDLs for Indian Creek; Willow Creek; Five, Ten, and Fifteen Mile Creeks; and Sand Hollow Creek.

- f. Develop a policy to address tribal waters and their status as part of the 2014 Integrated Report.

Schedule

Subbasin assessment and TMDL completions for CY 2016 are as outlined above.

Funding

These activities are funded by state monies appropriated through the Idaho Legislature. Presently, DEQ devotes approximately 34,087 person hours (approximately 16.4 work years) and \$210,789 in operating funds to support this effort. Successful achievement of these activities will depend on additional funding and collaborative efforts with other agencies. TMDL implementation plan development efforts conducted by DEQ staff are funded by state general funds and some federal §319 funds.

Contacts

Surface Water Program Manager, DEQ, (208) 373-

David Croxton, EPA, (206) 553-6694

1.1b Complete 5-year reviews of existing TMDLs and better coordinate with EPA, WAGs, and DMAs regarding 5-year reviews.

Approach

Idaho Code §39-3611(7) advised DEQ to complete TMDL 5-year reviews for selected TMDLs. DEQ will coordinate monitoring activities to support the reviews and begin data collection for 5-year reviews to be completed in CY 2016.

Outputs

- a. Prioritize existing TMDLs for completion of 5-year reviews. Complete six TMDL reviews during CY 2016 (see list above).
- b. Consult with WAGs on 5-year review as required by Idaho Code §39-3611(7) and share drafts with EPA for review. EPA shall provide comments, if any, within 30 days.
- c. In the event a 5-year review indicates lack of progress towards meeting the allocations and water quality targets set forth in the TMDL, DEQ will work with the WAGs and DMAs to determine the next steps. DEQ may initiate a process consistent with Idaho Code §39-3611(7) to consider revisions to the TMDL as funding, technical resources, and workload priorities allow.
- d. Initiate monitoring in CY 2016 of six more prioritized subbasins for the purpose of developing data for 5-year TMDL reviews to be completed by May CY 2017.

Schedule

Review of EPA-approved TMDLs must be conducted every 5 years per Idaho Code §39-3611(7). During CY 2106, DEQ has resources to complete reviews of six EPA-approved

TMDLs by the end of the calendar year. During CY 2016, DEQ will conduct monitoring of six more subbasins for 5-year reviews to be completed in CY 2017.

Funding

Some of the activities in CY 2014 were funded by \$117,999.66 provided by EPA to support TMDL 5-year review monitoring. Additional funding, estimated at approximately \$120,000 per year, would be required to support the same level of 5-year review monitoring in CY 2015 and 2016. For CY 2015, DEQ is going to use EPA §106 monitoring initiatives monies to complete monitoring and 5-year reviews. No funding has been determined for CY 2016–2017. Presently, DEQ devotes approximately 4,620 person hours (approximately 2.2 work years) and \$71,148 in operating funds to support this effort. Successful achievement of these activities will depend on additional funding and collaborative efforts with other agencies. TMDL implementation plan development efforts conducted by DEQ staff are funded by state general funds and some federal §319 funds.

1.1.c Revise DEQ’s Water Quality Trading Guidance as necessary.

Approach

The Willamette Partnership is coordinating efforts by Idaho, Washington, and Oregon in the development of joint regional water quality trading guidelines and best practices. EPA serves in an advisory capacity in this effort. Subsequent to this process, DEQ may revise its Water Quality Trading Guidance as DEQ deems appropriate as a result of the EPA and multistate coordination.

Outputs

- a. Pilot best practice recommendations in DEQ’s Water Quality Trading Guidance.
- b. Pilot best practice recommendations in DEQ LBR Trading Framework.
- c. The CY 2015 Joint Regional Agreement Pilots may be incorporated into DEQ’s Water Quality Trading Guidance and the LBR Trading Framework after a public comment period, and adopted formally as guidance.

Schedule

The Joint Regional Agreement recommendations for best practices will be finalized by late CY 2016, and DEQ may initiate any necessary changes to the DEQ Water Quality Trading Guidance and or LBR Trading Framework in CY 2016.

Funding

The output identified in (a) and (b) above is funded through a partnership grant while (c) will be funded through Idaho general fund dollars as available

Monitoring and Assessment

1.2 Assess monitoring data for beneficial use status.

Approach

Continue to develop and maintain capacity for reporting §305(b) information in the Integrated Report. Continue electronic reporting of Integrated Reports using EPA's assessment database.

Outputs

- a. Provide draft 2014 Integrated Report for public comment by January 2016 after meeting with basin advisory group (BAG) and WAGs per §39:3601 et seq. in May 2015.
- b. Develop report on stream diatom index performance; include results in 2016 Integrated Report. Share the results with EPA.
- c. Share the draft Idaho Lakes Monitoring Methods document with EPA from data collected in 2012. Continue completing this work under the EPA federal fiscal year (FFY) 2010 §106 monitoring initiative strategies grant.
- d. Implement at least six Beneficial Use Reconnaissance Program (BURP) ambient monitoring crews during the 2016 field season, with the possibility of a seventh crew.
- e. DEQ will continue to use the Water Quality Exchange Network node to move BURP data to the STORET data warehouse twice per year.
- f. Assist in identifying water quality improvements meeting EPA National Management Measures (SP-10, SP-12, and WQ-21).
- g. Continue development of the Water Body Assessment Guidance, 3rd edition, under the EPA FFY 2012–2013 §106 monitoring initiative strategy grant.
- h. Report results of the nutrient effects project. Enhance the public interface of the surface water database application. These projects are funded by EPA's FFY 2011 §106 monitoring initiative strategy funds.
- i. Work with the University of Idaho to implement the monitoring plan, quality assurance project plan (QAPP), and standard operating procedure to collect data to evaluate the Idaho Department of Lands new shade rule.

Schedule

Scheduling and logistics will be a key aspect in successfully completing the BURP and National Wetland Survey monitoring projects in CY 2016. Timely receipt of semiannual reports prescribed by the terms and conditions of the §106 monitoring initiative strategy grants is necessary to effectively manage grant funds. DEQ will evaluate data received during the call for data for use in the 2014 Integrated Report.

Funding

DEQ estimates approximately 23,815 person hours (equivalent to 11.5 work years) and \$264,257 in operating funds to support the effort in this PPA cycle. Funding sources are state general fund dollars and EPA §106 monitoring initiative and National Rivers and Streams Assessment (NRSA) grants.

Contacts

Surface Water Program Manager, DEQ, (208) 373-

Gretchen Hayslip, EPA, (206) 553-1685

David Croxton, EPA, (206) 553-6694

Water Quality Standards

1.3 Develop scientifically based functional water quality standards to address program needs and to ensure protection of Idaho water.

Approach

DEQ and EPA will work collaboratively to develop revised water quality standards and implementation guidance. DEQ will request applicant status, participate in Endangered Species Act consultations, and submit rulemaking dockets approved by the Idaho Legislature for EPA action. EPA will review and consult on submittals of revisions to Idaho water quality standards.

Outputs

- a. DEQ anticipates submitting a rule regarding use attainability analysis (UAA) to the 2016 Idaho Legislature.
- b. DEQ has begun a CY 2015 rulemaking on aquatic life copper criteria and expects to publish a proposed rule by May 2016.
- c. DEQ will propose revisions to DEQ's human health (toxic) criteria based on Idaho specific data (e.g., Fish Consumption Rate (FCR)). The resulting rule is anticipated to be ready for the 2016 Legislative session.
- d. DEQ will submit a final mixing zone rule package including revised Mixing Zone Guidance to EPA by January 2016.
- e. DEQ expects to submit a final report to EPA on UAA reviews of Blackbird, West Fork Blackbird, and Bucktail Creeks by January 2016.
- f. DEQ expects to finalize the Antidegradation Guidance by March 2016.
- g. Continue discussions with EPA and Manmade Waters work group on how to handle discharges to canals and drains.
- h. Continue discussions with EPA on federal lawsuits involving Idaho water quality standards.

Schedule

DEQ anticipates the items listed in Outputs will be completed and submitted to EPA by dates specified above.

Funding

These water quality standards activities will be funded by monies appropriated through the Idaho Legislature. DEQ estimates approximately 13,525 person hours (equivalent to 6.5 work years) to support this effort. Achievement of future goals will depend on the

availability of additional resources and collaborative efforts with other agencies. DEQ anticipates adding additional FTEs to accomplish the outputs in d and e above.

Contacts

Surface Water Program Manager, DEQ, (208) 373-

Angela Chung, EPA, (206) 553-6511

Michael Lidgard, EPA, (206) 553-1755 (mixing zone analyses and §401 certification)

1.4 Component commitments.

DEQ Commitments

Refer to sections 1.1, 1.2, and 1.3 regarding TMDL, monitoring and assessment, and water quality standards activities.

- a. Continue leading the selenium site-specific criteria development work group.
- b. Continue to coordinate with EPA on current lawsuits and settlement agreements, which include timelines for human health criteria development, and challenges to EPA's approvals of Idaho's arsenic human health criteria and temperature water quality standards.
- c. Continue dialogue with EPA on inclusion of Idaho mercury fish tissue criterion in NPDES permits and TMDLs.
- d. Share prepublic comment period drafts of TMDLs.
- e. Share drafts of each 5-year review with EPA for review and comment.
- f. Continue efforts to complete a nutrient TMDL for LBR and listed tributaries.
- g. Implement BURP ambient monitoring across the state.
- h. Strengthen working relationship on an ongoing basis.
- i. Both EPA and DEQ will make appropriate staff assignments to each TMDL.
- j. Report overall Surface Water Program progress semiannually to EPA, regarding water quality standards submittal and approval actions, TMDLs, Integrated Report, monitoring, and PPA commitments.
- k. Coordinate review and selection of nonpoint source (NPS) projects and activities directed to priority watersheds, taking into account multiple available funding sources.
- l. Continue support of the watershed approach, using basin monitoring efforts, state program integration, and stormwater planning to emphasize NPS Program results.
- m. Work together on policy for tribal waters and their status for the 2014 Integrated Report.
- n. Identify priority watersheds for restoration, consistent with EPA's TMDL vision (Water Quality Measure 27).

EPA Commitments

- a. Produce draft TMDLs for the Nez Perce Tribe on the Lower Clearwater River (hydrologic unit code 17060306) (Appendix N, 2010 Integrated Report).
- b. Issue Jordan Creek mercury TMDL.

- c. Participate early, to the extent possible, in high-priority rulemaking proceedings negotiated by DEQ for water quality standards.
- d. Approve or disapprove all TMDLs and water quality standards submitted by DEQ on a timely basis.
- e. Act on the current Integrated Report within statutory time frames.
- f. Continue to review and act on DEQ-submitted TMDLs and provide Idaho TMDL Settlement Agreement parties with copies of EPA-approved TMDLs and corresponding action letters on a timely basis.
- g. Improve coordination of NPDES permitting with DEQ mixing zone authorization and TMDL completion.
- h. Continue EPA technical support to DEQ for mercury TMDL development.
- i. Review and comment on revisions to Water Body Assessment Guidance, 3rd edition, as they are completed.
- j. Provide technical assistance to DEQ, as needed, in evaluating fish consumption information and revision to the human health criteria.
- k. Review and provide timely comments on DEQ 5-year reviews.
- l. Continue to provide timely updates on EPA lawsuits and settlement agreements involving Idaho's water quality standards.
- m. Provide contract support for the Lake Walcott data assessment.

Component 2. Watershed Protection Program

2.1 Manage §319 Nonpoint Source Program.

Approach

Implement the §319 NPS Program through the EPA-approved 2015 Idaho NPS Management Plan and 2004 EPA §319 guidance. The Idaho NPS Management Plan is available at deq.idaho.gov/media/60153107/idaho-nonpoint-source-management-plan.pdf.

Outputs

- a. Successfully award and complete implementation project grants initiated under §319 contracts. These grants are contingent upon approved TMDLs or other water quality priorities and will be based on the amount of funding available, and the time frame funds are released to the state. The §319 Idaho NPS Management Plan will be used as a guidance document for this activity.
- b. Administer grants in accordance with relevant grant conditions, using the Grant Reporting and Tracking System (GRTS) to report program activities on all mandatory elements, including estimated project load reductions (for nitrogen, phosphorus, and sediment as applicable). DEQ will enter all GRTS load reduction estimates for previous year projects by February 15, 2016, and all other GRTS mandatory elements by April 1, 2016, under the national deadlines.
- c. Complete and submit an annual performance and progress report for the NPS Management Program and §319 grant.
- d. Update the NPS memorandums of understanding as necessary.
- e. Perform §319 project evaluations using the Idaho NPS Management Plan as guidance. DEQ and EPA will continue to work together on the process and documentation for use of §319 funds, implementing the nine-element watershed-based plan (including qualifying TMDL implementation plans) in impaired waters.
- f. With EPA assistance, work to identify and integrate outside funding with §319 funding to provide increased funding for implementation work in priority watersheds, per DEQ's 2016–2019 Strategic Plan.
- g. As requested, help identify potential success stories under EPA criteria. Success stories are a means to document the national NPS Program measure WQ-10 (if partial or full water body restoration is achieved) or progress toward restoration (non-WQ-10). For those stories that qualify, and with EPA's support, seek to develop a minimum of two WQ-10 success stories yearly. DEQ and EPA will continue to work together to assess and target monitoring needs to document NPS water quality improvements under the strategic program measures.
- h. Continue to develop a process to ensure that approvable §319-funded project work plans fully evaluate alternative designs or measures that best address the primary long-term water quality objectives of the proposal.

Schedule

Activities conducted under the §319 NPS Program will follow milestones identified in the §319 NPS grant work plan.

Funding

EPA funds approximately 60% of the §319 NPS Program, while 40% in matching funds comes from state and local sources. DEQ estimates approximately 10,600 person hours (approximately 5.10 work years) and approximately \$400,000 from the federal §319 grant to support §319 DEQ administrative activities. DEQ and EPA agree to work in partnership to meet and address these funding challenges.

Contacts

Tim Wendland, DEQ, (208) 373-0439

Dave Pisarski, DEQ, (208) 373-0464

Bill Stewart, EPA, (208) 378-5753

2.2 Component commitment.**EPA Commitments**

EPA will work with DEQ to find the most expeditious mechanisms to use the state's full §319 allocation while minimizing the need for carryover funds between grants.

Component 3. Reuse Permit Program

Program Goal

The goal of the Reuse Permit Program is to ensure recycled water is used in a manner that protects human health and the environment with respect to surface water and ground water. DEQ also supports the ultimate goal of the NPDES Program by encouraging the elimination of pollutant discharges to waters of the United States.

Program Activities

Process reuse permits, perform compliance oversight of reuse-permitted facilities, assist public health districts in the on-site wastewater program, develop program guidance materials, and ensure statewide consistency.

Program Contacts

Chas Ariss, P.E., DEQ, (208) 373-0561

Michael Lidgard, EPA, NPDES Unit, (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison, (208) 378-5616

Program Commitments

Priorities

- Conduct 50 reuse permit inspections.
- Issue 20 protective reuse permits.
- Conduct timely review of reuse permit annual reports.

Outcome

The outcome and goal of the Reuse Permit Program is to decrease the number of wastewater facilities that discharge to waters of the United States.

3.1 Process 20 reuse permits by December 31, 2016.

Approach

Priority will be given to new facilities, industrial facilities with expired permits, facilities with inadequate reuse permit limits, and facilities with the potential to impact impaired water bodies.

Outputs

- a. Issue reuse permits.
- b. Transmit to EPA, on a semiannual basis, a list of permits issued.

Schedule

DEQ will report on the number of reuse permits issued from January 1 to June 30, 2016, by July 31, 2016.

DEQ will transmit to EPA a list of all reuse permits issued in CY 2016 within 30 days of the end of the calendar year.

Funding

State monies and federal (EPA) grants, including Surface Water §106, fund this activity. Staff in DEQ’s State Office Water Quality Division and six DEQ regional offices will complete this activity.

| Activity | Level of Effort |
|------------------|-----------------|
| Reuse Permitting | 7.5 FTE |

Contacts

Chas Ariss, P.E., DEQ, (208) 373-0561

Michael Lidgard, EPA, NPDES Unit, (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison, (208) 378-5616

3.2 Provide compliance oversight of reuse permitted facilities.

Approach

Provide oversight of permits for compliance with permit conditions by conducting field inspections and reviewing annual reports. Perform enforcement and compliance actions as needed.

Outputs

- a. Complete 50 inspection reports.
- b. Complete 60 annual report reviews.
- c. Report progress semiannually on the number of inspections and annual report reviews completed.

Schedule

All performance measures will be met by the end of the calendar year.

Funding

This activity is funded by state funds and federal (EPA) grant monies, including Surface Water §106 funds. Staff in DEQ’s Technical Services Division, state office Water Quality Division, and six regional offices will complete this activity.

| Activity | Level of Effort |
|-----------------------|------------------------|
| Compliance activities | 4.0 FTE |

Contacts

Chas Ariss, P.E., DEQ, (208) 373-0561

Michael Lidgard, EPA, NPDES Unit, (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison, (208) 378-5616

3.3 Develop program guidance materials and ensure statewide consistency.

Approach

Staff in DEQ's state office Water Quality Division will be responsible for developing materials for regional offices to use in implementing the Reuse Permit Program in the field, including direction, guidance, and tracking systems. A guidance development work group, comprised of DEQ representatives, stakeholders, consultants, and individuals, is currently revising the guidance. Higher priority items are being revised first. The effort is expected to be ongoing for several years. Guidance topics that are being worked on include forest application rates; irrigation guidance; rapid infiltration; quality assurance project plan; and plan of operations. An annual permit writer workshop is held with DEQ staff to ensure statewide consistency. Additionally, DEQ coordinates an annual water reuse conference to inform the regulated community and consultants about the latest trends in Recycled Water Rules, implementation, and case studies.

Outputs

- a. Provide copies of the most current draft guidance semiannually and final guidance once finalized.
- b. Provide reuse training to new and existing staff as funding is available.
- c. Hold reuse permit writer workshop.
- d. Sponsor and host the annual water reuse conference and related workshops.

Schedule

All performance measures will be met by the end of the calendar year.

Funding

This activity is funded by state funds and federal (EPA) grant monies, including Surface Water §106. Primarily staff in DEQ's state office Water Quality Division will complete this activity with support from DEQ's Technical Services Division and the six regional offices.

| Activity | Level of Effort |
|---|-----------------|
| Develop guidance and ensure consistency | 1.7 FTE |

Contacts

Chas Ariss, P.E., DEQ, (208) 373-0561

Michael Lidgard, EPA, NPDES Unit, (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison, (208) 378-5616

3.4 Water Quality §106 grant performance measures—provide annual performance measure report.

Approach

An annual performance measure report will be provided by DEQ to indicate progress in eliminating pollutants from surface water by reuse permit program activities. Overall, surface water is improved by the reduction of pollutant discharges, ultimately contributing to the goal of the NPDES Program to eliminate pollutant discharge.

Outputs

- a. Total gallons annually of wastewater with pollutants eliminated from discharge to surface water by reusing water. Pounds of pollutants removed will also be provided if available for the following constituents: nitrogen, phosphorus, and chemical oxygen demand. A qualitative description will be provided for the various types of reuse permits issued by DEQ to address public health risks.
- b. Total number of facilities that reuse water, thereby reducing the number of new facilities requiring NPDES permits and reducing the backlog of expired and new NPDES permits issued by EPA.

Schedule

The annual performance measure report will be provided within 60 days after the end of the calendar year.

Funding

Funding for this activity consists of 208 person hours (0.1 work years) from Water Quality §106 funds.

Contacts

Chas Ariss, P.E., DEQ, (208) 373-0561

Michael Lidgard, EPA, NPDES Unit, (206) 553-1755

Maria Lopez, EPA, Idaho NPDES Liaison, (208) 378-5616

3.5 Manage the On-Site Wastewater Program; revise the *Technical Guidance Manual for Individual and Subsurface Sewage Disposal Systems*, assist the public health districts in issuing on-site permits; review large soil absorption system plans and specifications; and perform nutrient-pathogen evaluations.

Approach

DEQ’s state office provides guidance materials and overall management activities related to this program through funding of the §604(b) grant. The regional offices will be responsible for reviewing plans and specifications and ground water impact studies.

Outputs

- a. Revise the Technical Guidance Manual.
- b. Provide public health district training, audits, and program reviews.
- c. Review plans and specifications for large soil absorption systems.
- d. Assist in the review of nutrient-pathogen evaluations.

Schedule

Activities will be completed on an as-needed basis. Plans and specifications and nutrient-pathogen evaluations will be completed within 42 days of submittal if possible.

Funding

Funding for this activity includes Water Quality §106 funds, federal (EPA) §604(b) grant, and state funds.

| Activity | Level of Effort |
|--|-----------------|
| On-site coordination, plan reviews, other guidance, and training | 2.22 FTE |

Contacts

Chas Ariss, P.E., DEQ, (208) 373-0561

Tyler Fortunati, DEQ, (208) 373-0140

Bevin Horn, EPA, Grants and Strategic Planning Unit, (206) 553-1566

Michael Cox, EPA, Grants and Planning Unit, (206) 553-4269

Maria Lopez, EPA, Idaho NPDES Liaison, (208) 378-5616

3.6 Component commitment.

EPA Commitment

Encourage water reuse where it is a preferable alternative to wastewater discharge to waters of the United States.

Component 4. Ground Water Program

Program Goal

The goals of the DEQ Ground Water Program are to protect and improve the quality of the state's ground water and ensure that existing and future beneficial uses including drinking water, agricultural, industrial, and aquaculture water supplies are met. All ground water must be protected against contamination as a valuable public resource per Idaho's "Ground Water Quality Rule" (IDAPA 58.01.11). The quality of degraded ground water must be restored where feasible and appropriate to support designated beneficial uses.

Since October 2005, the Ground Water Program also coordinates source water assessment and protection activities to protect public sources of drinking water.

Program Activities

Coordinate all ground water and source water protection-related programs funded by EPA in Idaho, develop and implement Ground Water Quality Improvement Plans (GWQIPs) in priority areas of the state, develop guidance for interpreting the Ground Water Quality Rule, and implement Idaho's source water protection strategies.

Perform other activities related to the Ground Water Program and source water protection such as rule interpretation and implementation, project and contract management, policy development and implementation, public education and outreach, regional/local ground water monitoring, source water assessments for new sources, and source water protection plans and projects.

The number of staff allocated to the Ground Water Program during state fiscal year (SFY) 2016 was reduced from 17.2 FTEs in SFY 2015 to 16.3 FTEs in SFY 2016. Federal G106 funding remained constant at 2.2 FTEs. The number of FTEs funded by the state general fund during SFY 2016 was reduced by approximately 0.6 FTEs. The number of hours funded by the SRF set aside to fund Source Water Protection was reduced by approximately 0.3 FTEs.

All tasks will continue to be implemented as required by statute, rule, or agreement. However, to accommodate the reduction in staff hours, lower priority activities will receive fewer resources or be delayed.

Program Contacts

Ed Hagan, DEQ, (208) 373-0356

Susan Eastman, EPA, (206) 553-6249

Program Commitments

Priorities

- Coordinate and integrate development and implementation of GWQIP in nitrate priority areas (NPAs) with Source Water Protection Plans to more efficiently use limited resources.
- Continue ground water monitoring in NPAs and other areas of concern throughout the state to determine the nature and extent of contamination, set a baseline for effectiveness of best management practices (BMPs), and evaluate ground water quality improvement activities.
- Implement the Ground Water Quality Rule and the Idaho Ground Water Quality Plan with other designated agencies through participation in the Idaho Ground Water Protection Interagency Agreement. Signatory parties to the agreement include DEQ, (Idaho Department of Water Resources (IDWR), Idaho State Department of Agriculture (ISDA), Idaho Public Health Districts, and Idaho Soil and Water Conservation Commission.
- Populate DEQ's ground water quality database with new ground water quality data. Continue refinements to DEQ's online mapping applications for the ground water quality database and technical reports to increase accessibility for the public.
- Approve ground water quality monitoring programs at managed aquifer recharge sites in accordance with the Idaho wastewater rule, "Land Application of Wastewater(s) or Recharge Water" (IDAPA 58.01.16.600).
- Assist interested parties with implementing source water protection efforts. One avenue of assistance includes distributing source water protection grants to organizations such as the Idaho Rural Water Association to assist communities with development and implementation of source water protection plans and the Idaho Water Resources Research Institute to assist with education and outreach efforts.
- Provide education and outreach, including general ground water education to the public. Promote ground water BMPs to landowners and stakeholders, educate local governments about the responsibilities for ground water protection, and assist with developing ordinances for source water and ground water protection.
- Provide technical hydrogeological support and regulatory assistance to other DEQ programs and state agencies.

Outcomes

- Increased number of NPAs with decreasing nitrate concentration trends.
- Minimized risk to public health by implementing measures defined in rules related to managed aquifer recharge, mining, and oil and gas activities.
- Minimized risk to public health for populations served by community water systems through implementation of Idaho's source water protection strategies.
- Increased availability of source water assessment information and ground water quality data through online applications and education and outreach to increase public awareness of the source of drinking water and importance of ground water protection to protect drinking water quality.

Program Indicators

Program indicators are the number of improvement plans/strategies implemented in areas with degraded ground water quality, as well as percentages of community water systems and/or populations served by community water systems implementing ground water/source protection strategies.

4.1 Manage, oversee, and provide administrative support to the Ground Water Program, and coordinate other ground water activities.

Approach

DEQ will administer the Idaho Ground Water Program to ensure statewide consistency with the DEQ state office and regional offices.

Outputs

- a. Coordinate Ground Water §106 grant and PPA activities with regional offices during development of their annual work plans and budgets.
- b. Coordinate with EPA to develop the ground water tasks and language in the 2017 PPA and annual Ground Water §106 work plan and budget.
- c. Coordinate Ground Water §106 grant activities with DEQ programs that regulate activities impacting ground water such as water reuse, brownfields projects, and ground water remediation projects.
- d. Conduct monthly program conference calls with DEQ regional office Ground Water Program staff and DEQ Technical Services Division personnel.
- e. Organize and conduct Ground Water Program meetings.
- f. Organize and coordinate training for program staff as needed.
- g. Develop midyear and annual Ground Water §106 grant and PPA reports.
- h. Revise and develop the ground water portion of DEQ's strategic plan.

Schedule

The schedule will include quarterly coordination calls and semiannual grant reporting calls with EPA. DEQ will contact EPA's project officer to discuss any issues that will affect the successful completion of the grant commitments as soon as DEQ becomes aware of issues.

Funding

This activity will be funded with a combination of EPA Ground Water §106 funds and state funds. DEQ staff working on this activity will consist of the state office program manager, regional office managers, regional office technical leads, and administrative support. The projected level of effort for this activity is estimated to be 1.1 work year (of which approximately 0.5 work years is funded from the federal Ground Water §106 grant). State general funds will fund 0.6 work years of effort.

Contacts

Ed Hagan, DEQ, (208) 373-0356

Susan Eastman, EPA, (206) 553-6249

4.2 Coordinate ground water implementation strategies for a comprehensive program with state and federal agency partners.**Approach**

DEQ will coordinate activities with other agencies for protecting ground water.

Outputs

- a. Chair the Ground Water Monitoring Technical Committee.
- b. Participate in interagency coordination efforts as needed to fulfill DEQ's obligations as required by statute and the Idaho Ground Water Quality Plan. Existing committees in which DEQ participates when active include Agricultural Ground Water Coordination Committee, Idaho Ground Water Education Committee, and Idaho Pesticide Management Plan Rule Advisory Group.
- c. Implement the 2008 Idaho Ground Water Protection Interagency Cooperative Agreement and other existing cooperative agreements. Signatory parties to the Idaho Ground Water Protection Interagency Cooperative Agreement include DEQ, IDWR, ISDA, Idaho Public Health Districts, and Idaho Soil and Water Conservation Commission.

Schedule

Ground Water Monitoring Technical Committee meetings are held approximately every 6 months. Other interagency meetings do not occur on a regular basis.

Funding

This activity will be funded with a combination of EPA Ground Water §106 funds and state funds. DEQ staff working on this activity will consist of the state office program manager and staff, regional office managers, and regional office technical leads. The projected level of effort for this activity is estimated to be 0.3 work years (of which approximately 0.2 work years is funded from the federal Ground Water §106 grant). State general funds will fund 0.1 work years of effort. This represents a reduction of 0.1 FTE from the previous year.

Contacts

Ed Hagan, DEQ, (208) 373-0250

Susan Eastman, EPA, (206) 553-6249

- 4.3. Interpret and implement the Idaho Ground Water Quality Rule, develop guidance, and develop policy. Provide hydrogeological support to other DEQ programs and agencies as needed. Provide support for DEQ Quality Management Plan (QMP) implementation.**

Approach

Continue implementing the Idaho Ground Water Quality Plan. Coordinate Ground Water Quality Rule interpretation and implementation with DEQ's state office and regional offices.

Outputs

- a. Develop or modify guidance documents for interpreting the Idaho Ground Water Quality Rule as needed. Activities may include modifying the guidance for recharge by land application; finalizing guidance for preparing applications for points of compliance for mining; and potentially initiating guidance for ground water protection during natural gas development activities; and social and economically justifiable ground water degradation.
- b. Continue to provide hydrogeological support for implementing and enforcing the Ground Water Quality Rule to DEQ staff in other programs and in the regional offices. Assist other state agencies, the general public, and the regulated community as needed. Activities may include setting mining points of compliance; and reviewing permit applications and fresh water protection plans for oil and gas activities.
- c. Continue to provide revisions to DEQ's QMP and assist with developing statewide generic QAPPs and project-specific field sampling plans.

Schedule

Final outputs are scheduled for December 31, 2016, and may be subject to change, depending on allocation of state resources and priorities.

Funding

This activity will be funded with a combination of EPA Ground Water §106 funds and state general funds. DEQ staff working on this activity will consist of the state office program manager and staff and, to a lesser extent, regional office technical leads. The projected level of effort for this activity is estimated to be 1.7 work years (of which approximately 0.8 work years is funded from the federal Ground Water §106 grant). State general funds will fund 0.9 work years of effort. This represents a reduction of 0.1 FTE from the previous year.

Contacts

Ed Hagan, DEQ, (208) 373-0356

Susan Eastman, EPA, (206) 553-6249

4.4 Implement ground water quality improvement activities, including improvement plans, in priority areas of the state.

Approach

DEQ is focusing on combining GWQIPs with source water protection efforts at the county level. By developing county-level information, multiple NPAs within a county can be addressed. DEQ will continue to work with the public and relevant agencies in the area to develop ground water quality improvement strategies. DEQ is educating local governments about their authorities and responsibilities for implementing source water and ground water protection activities.

Outputs

- a. GWQIPs that are consistent with the Idaho Ground Water Quality Plan, Ground Water Quality Rule, and DEQ policy PM-004, “Policy for Addressing Degraded Ground Water Quality Areas” and contain effective strategies for restoring degraded areas.
- b. Provide education and information to elected officials, such as county commissioners, or local advisory groups, on ground water degradation and the need for source water and ground water protection. Implementation efforts will be directed toward more populous counties containing a large number of source water protection areas and NPAs. Counties exhibiting a desire to implement protection activities will also be prioritized for assistance. Efforts will be directed toward areas where public water systems with high susceptibility scores are clustered.

Schedule

Final outputs are scheduled for December 31, 2016, and may be subject to change, depending on allocation of state resources and priorities.

Funding

This activity will be funded with state funds. DEQ staff working on this activity will consist of regional office managers and regional office technical leads. The projected level of effort for this activity is estimated to be 0.8 work years of effort. State general funds will fund this effort. This represents a reduction of 0.2 FTE from the previous year.

Contacts

Toni Mitchell, DEQ, (208) 373-0250

Susan Eastman, EPA, (206) 553-6249

4.5 Conduct ground water quality monitoring projects and manage ground water quality data.

Approach

DEQ will work with the public and coordinate with relevant agencies in the area to develop and implement ground water quality monitoring studies. Ground water quality

monitoring projects will be coordinated with existing projects underway by other agencies.

Outputs

- a. Develop and conduct local or regional monitoring projects to determine baseline ground water quality, to follow up on detections of concern or complaints, or to evaluate impacts of BMPs or land-use changes on ground water quality.
- b. Continue to populate the DEQ ground water quality database with new ground water quality data. Implement improvements to the database to increase efficiency of data entry. Continue improvements for DEQ's online mapping application to include greater constituent query capabilities and increased data download features.
- c. Prepare an annual report of ground water quality data collected by DEQ or DEQ contractors with public funds during CY 2015.
- d. Participate in the concentrated animal feeding operation (CAFO) site advisory team comprised of members from DEQ, ISDA, and IDWR. The CAFO site advisory team provides suitability determinations for counties to use when considering conditional use or livestock confinement operation permits.
- e. Maintain and update database containing ISDA dairy inspection ground water monitoring results of samples with nitrate at or above 10 milligrams per liter.

Schedule

Activities are anticipated to be complete by December 31, 2016. Monitoring projects are not yet identified for CY 2016.

Funding

This activity will be funded with a combination of EPA Ground Water §106 funds and state funds. DEQ staff working on this activity will consist of state office program staff, regional office technical leads, and technical services staff. The projected level of effort for this activity is estimated to be 1.8 work years (of which approximately 0.3 work years is funded from the federal Ground Water §106 grant). State general funds will fund 1.5 work years of effort. This is a decrease of 0.2 work years from the previous year. This represents a reduction of 0.2 FTE from the previous year.

Contacts

Kathryn Elliott, DEQ, (208) 373-0191

Susan Eastman, EPA, (206) 553-6249

4.6 Manage and implement ground water quality protection strategies for managed aquifer recharge.

Approach

Continue oversight of ground water quality monitoring activities at managed aquifer recharge sites. Coordinate with DEQ regional offices and other agencies to interpret the Ground Water Quality Rule and authorities under Section 600 of the "Wastewater Rules"

(IDAPA 58.01.16) for land application of recharge water. Recharge activities are increasing due to legislation passed in 2014 providing \$5 million annually to support statewide aquifer stabilization and authorizing one-time funding of \$4 million to develop infrastructure for managed aquifer recharge activities.

Outputs

- a. Continue to work with IDWR at existing and proposed Idaho Water Resources Board recharge sites to develop ground water quality monitoring plans and monitor ground water quality potentially impacted by aquifer recharge activities.
- b. Meet with IDWR on a quarterly basis to improve coordination and ensure managed aquifer recharge activities are conducted in accordance with state water quality regulations. Discuss development of a managed recharge application process to facilitate interagency cooperation.
- c. Review and make recommendations for water quality monitoring plans for land application by recharge water projects conducted by entities other than the Idaho Water Resource Board.
- d. Review and provide comments to the IDWR Underground Injection Control (UIC) Program on injection well permits related to aquifer recharge and tracer tests as requested. Work with the IDWR UIC program to encourage using monitoring requirements that are consistent with DEQ requirements.

Schedule

Final outputs are scheduled for December 31, 2016, and are subject to change depending on allocation of state resources and priorities.

Funding

This activity will be funded with a combination of EPA Ground Water §106 funds and state funds. DEQ staff working on this activity will consist of state office program staff, regional office managers, regional technical leads, and administrative support. The projected level of effort for this activity is estimated to be 0.5 work years (of which approximately 0.2 work years are funded from the federal Ground Water §106 grant). State general funds will fund 0.3 work years of effort. This represents an increase of 0.1 FTE from the previous year.

Contacts

Toni Mitchell, DEQ, (208) 373-0250

Susan Eastman, EPA, (206) 553-6249

4.7 Conduct public education and outreach activities, provide staff training, and implement program.**Approach**

Continue education and outreach activities to encourage voluntary implementation of ground water protection activities. Activities will be coordinated with other agencies such as IDWR and the Idaho Soil and Water Conservation Commission (ISWCC).

Outputs

- a. Provide informational presentations and technical assistance and respond to public information requests. A monthly average of 10 public information requests is anticipated for each regional office and the state office.
- b. Conduct workshops and open houses and participate in fairs and other community events.
- c. Participate in ground water quality education activities geared toward school teachers and students.
- d. Promote adoption of BMPs for ground water and work more closely with the Idaho Soil and Water Conservation Commission to provide information to the agricultural community.
- e. Promote use of online mapping applications for ground water quality database, technical reports, and NPAs. Direct public records requests for such data to online applications.

Schedule

Final outputs are scheduled for December 31, 2016, and are subject to change depending on allocation of state resources and priorities.

Funding

This activity will be funded with a combination of EPA Ground Water §106 funds and state funds. DEQ staff working on this activity will consist of state office program staff, regional office managers, regional technical leads, and administrative support. The projected level of effort for this activity is estimated to be 1.6 work years (of which approximately 0.2 work years are funded from the federal Ground Water §106 grant). State general funds will fund 1.4 work years of effort. This represents a reduction of 0.1 FTE from the previous year.

Contacts

Ed Hagan, DEQ, (208) 373-0356

Susan Eastman, EPA, (206) 553-6249

4.8 Conduct source water protection activities.

Approach

DEQ will coordinate activities with other agencies, cities, and counties, as well as the Idaho Rural Water Association source water protection staff. DEQ will continue to sponsor and/or participate in regional source water protection educational outreach and training events. If funding is available, a small number of source water protection grants will be awarded to contractors through request for proposal (RFP) process.

Outputs

- a. Number of source water assessments completed for new sources.
- b. Number of source water protection plans completed and/or recertified.
- c. Number of source water protection projects completed.
- d. Number of outreach or educational events.

DEQ will annually provide EPA with a list of completed source water assessments and source water protection plans, an example of one completed source water protection project, and a list of completed projects for the year. DEQ will provide EPA with a summary of the status of the grant program that includes a review of grant accomplishments and descriptions of any new projects if grants are awarded.

Schedule

Final outputs scheduled for June 30, 2016.

Funding

This activity will be funded by the EPA State Revolving Fund (SRF) wellhead 10% set-aside (1452(g)(2)). DEQ staff working on this activity will consist of state office program staff, and regional office staff, estimated at a level of approximately 7.6 work years. This represents a reduction of approximately 0.3 FTE from the previous year.

Contacts

Amy Williams, DEQ, (208) 373-0115

Susan Eastman, EPA, (206) 553-6249

4.9 Component commitments.

DEQ and EPA Commitments

- a. Review Ground Water Program progress on a semiannual basis. DEQ will contact the EPA project officer to discuss any issues that will affect the successful completion of the grant commitments as soon as DEQ becomes aware of issues.
- b. Continue to improve, maintain, and protect the quality of ground water in Idaho and seek additional resources to implement actions to accomplish that goal.
- c. Continue coordination and communication across program boundaries.

- d. Focus resources in prioritized areas with significant ground water quality degradation and in areas with a high density of public water system wells with high source water assessment susceptibility scores.
- e. Continue to share strategies on successful BMP implementation to reduce nitrate concentrations in areas with degraded ground water.

Component 5. NPDES Program

Program Goal

The goal of the NPDES Program is to maintain or improve the waters of the United States, which include surface waters of the state, and eliminate pollutant discharge. EPA currently retains primacy for the NPDES Program in Idaho although DEQ has initiated the process to develop a permit program. EPA is responsible for issuing and enforcing all NPDES permits. DEQ is responsible for certifying compliance of all NPDES permits with water quality standards and performing a negotiated number of compliance inspections per year for EPA. DEQ conducts approximately 50 NPDES inspections per year. DEQ will continue to maintain the capacity to perform tasks identified in the PPA.

Program Activities

- Perform NPDES compliance inspections.
- Review plans for wastewater facilities construction.
- Certify NPDES permits.
- Track and communicate NPDES-related enforcement actions with EPA.
- Maintain DEQ capacity to perform NPDES compliance inspections.
- Implement the authorization agreement between DEQ and EPA regarding issuance of EPA inspector credentials under the federal Clean Water Act.
- Continue development of an Idaho Pollutant Discharge Elimination System (IPDES) program and the elements of an NPDES program application.

Program Contacts

Mary Anne Nelson, DEQ (208) 373-0291

Stephen Berry, DEQ (208) 373-0269

Surface Water Program Manager, DEQ, (208) 373-

Michael Lidgard, EPA, (206) 553-1755

Jeff Kenknight, EPA, (206) 553-6641

Program Commitments

Priorities

- Complete approximately 50 quality assurance (QA)-reviewed NPDES inspections in CY 2016.
- Using the EPA/DEQ agreed-upon post-inspection follow-up letter template, submit to NPDES compliance inspections completed for municipalities and aquaculture facilities after inspections have been QA reviewed and finalized.

- Complete QA-reviewed complaint response inspections as directed by EPA in CY 2016.
- EPA will provide DEQ with a plan for CY 2016–2017 to issue NPDES permits, as well as an annual schedule for CY 2016.
- Use EPA’s plan and DEQ’s §401 guidance to prepare §401 certifications.
- Implement the authorization agreement between DEQ and EPA regarding issuance of EPA inspector credentials.
- Continue development of the IPDES Program with an anticipated application submittal date of September 1, 2016.

Outcomes

- Fifty QA-reviewed NPDES compliance inspections completed.
- Post-inspection follow-up letters for NPDES compliance inspections completed for municipalities and aquaculture facilities using EPA/DEQ agreed-upon post-inspection follow-up letter template.
- QA-reviewed NPDES complaint response inspections, if they arise and as directed by EPA.
- NPDES certifications performed in a timely manner.
- Maintain the training of DEQ inspectors to be credentialed as specified in EPA Order 3500.1.
- Continue guidance development and capacity building process for IPDES Program development. Hire new staff to develop program and prepare the memorandum of agreement (MOA) and program application for 2016 submittal.

5.1 NPDES activities—perform NPDES inspections; certify NPDES permits; review plans and specifications for wastewater facilities construction; track sanitary sewer overflows; and notify EPA of enforcement actions of interest.

Approach

To assist in improving waters of the United States, which include surface waters of the state, DEQ will perform compliance inspections for EPA; provide water quality certifications; and review plans and specifications for wastewater facilities construction.

Outputs

- a. Inspection list: EPA and DEQ will negotiate an enforcement confidential DEQ inspection list by December 15 each year. The enforcement confidential list will include the facility name, NPDES permit number, DEQ regional office conducting the inspection, and quarter in which the inspection will occur.
- b. Perform inspections consistent with the negotiated annual inspection list. Copies of DEQ’s regional office inspection reports will be e-mailed to Stephen Berry, Stephen.berry@deq.idaho.gov as TRIM links, and e-mailed to Maria Lopez, lopez.maria@epa.gov. Maria Lopez will forward the inspection reports to the appropriate EPA Region 10 staff.
- c. Using the EPA/DEQ agreed-upon template, finalize and transmit post-inspection follow-up letters to municipalities and aquaculture facilities. Post-inspection follow-up letters will be sent to NPDES municipal and aquaculture facilities following the

- completion of the QA reviewed inspection report. Copies of post-inspection follow-up letters will be submitted to Maria Lopez who will forward the letters to appropriate EPA Region 10 staff.
- d. Perform complaint response inspections as needed, and submit reports and associated forms as required for all NPDES inspections. These complaint inspections may be completed by suitably qualified DEQ staff.
 - e. Provide comments on preliminary draft permits and draft §401 certifications as appropriate, and final §401 certifications for proposed final permits.
 - f. Provide plan approval letters for wastewater facilities construction and copy Maria Lopez, EPA, Idaho Operations Office on these letters.
 - g. Provide quarterly reports that include a list of inspections conducted and a list of inspection reports completed during the period. The lists shall include the facility name, permit number, report date, and inspection date. Quarterly reports shall be e-mailed to Maria Lopez, lopez.maria@epa.gov.
 - h. Notify EPA of sanitary sewer overflows (sanitary sewer overflows and collection system backups) and enforcement actions of interest. Enforcement actions of interest include biosolids, septage, and unauthorized discharges from reuse facilities to surface waters. Notification shall be e-mailed to Maria Lopez, lopez.maria@epa.gov.
 - i. Prepare an annual sanitary sewer overflow report. The report will include a list of all sanitary sewer overflow events by NPDES permitted and unpermitted facilities, estimated volume, responsible party, receiving water (if any), and solutions. The annual report shall be e-mailed to Maria Lopez, lopez.maria@epa.gov, and e-mailed with a TRIM link to Chas Ariss, chas.ariss@deq.idaho.gov and Mary Anne Nelson, Mary.Anne.Nelson@deq.idaho.gov.
 - j. Conduct QA review of all NPDES inspections, including complaint response inspections, by a senior inspector or engineering manager.
 - k. Work with EPA to obtain and maintain EPA credentials for Idaho inspectors that conduct inspections on EPA's behalf. This output will include submittal of training documents as specified in EPA Order 3500.1 in their entirety for new inspectors seeking credentials. The training documents, including certificates shall be submitted to the NPDES compliance and enforcement manager upon making an application for inspector credentials. Additionally, inspectors who already possess credentials shall complete the following annual refresher requirements by October 1 each calendar year: 8-Hour Health and Safety Refresher, 3500.1 Program-Specific Refresher Training, and 3500.1 Inspection Skills Refresher Training. A certificate or other proof of completion is required for all the annual refresher training requirements. The certificates must be submitted in their entirety to the NPDES compliance and enforcement manager by October 1 of each calendar year. DEQ will also provide a current list of credentialed inspectors and staff seeking to become qualified to receive credentials to the NPDES compliance and enforcement manager no later than May 1, 2016.
 - l. Participate in Idaho NPDES primacy discussions.

Schedule

Engineering plans and specifications will be reviewed within 42 days (45 days for aquaculture facilities). Water Quality §401 certifications will be issued within 60 days.

NPDES compliance inspections will be conducted within the period scheduled, and NPDES compliance inspection reports will be completed within 60 days after the inspections are completed and, if possible, within 30 days, if no sampling is performed.

Funding

This activity will be funded by state and federal (EPA) grant monies, including Surface Water §106 funds. Staff in DEQ’s Technical Services Division, state office Water Quality Division, and six regional offices will complete these activities. The level of effort projected for this activity is 16,432 person hours (approximately 7.9 work years).

| Activity | Level of Effort |
|---|-----------------|
| NPDES inspections, sanitary sewer overflow reporting, enforcement coordination, and 8 to 10 complaint response inspections. | 2.0 FTE |
| Review wastewater plans | 5.4 FTE |
| Certify permits | 0.5 FTE |

Contacts

Mary Anne Nelson, DEQ (208) 373-0291

Chas Ariss, P.E., DEQ, (208) 373-0561

Michael Lidgard, EPA, (206) 553-1755

Jeff Kenknight, EPA, (206) 553-6641

5.2 Coordinate biosolids and stormwater activities.

Approach

Coordinate responses to questions on stormwater and biosolids programs with EPA, other state agencies, and the regulated community.

Outputs

- a. DEQ will continue to provide compliance assistance to EPA’s permit writer, particularly related to reissuance of the stormwater construction general permit, the multisector general permit, and assistance to local municipalities complying with municipal separate storm sewer system (MS4) NPDES permits.
- b. Depending on EPA-sponsored training, DEQ will begin to develop inspection capabilities for other sectors during this PPA cycle. EPA will provide training as resources allow to DEQ inspectors.
- c. DEQ will review proposals for land application of biosolids and domestic septage and will approve or disapprove land application sites in accordance with state regulations (IDAPA 58.01.16.650 and IDAPA 58.01.15).
- d. DEQ will revise and promote DEQ’s Catalog of Stormwater BMPs as needed.
- e. DEQ will provide basic information and referrals on stormwater issues.

- f. DEQ will provide draft and final §401 certifications as appropriate for MS4 stormwater permits and statewide stormwater general permits.

Schedule

Activities will be completed on an as-needed basis.

Funding

Activities are funded in part by a federal Water Quality §106 grant.

| Activity | Level of Effort |
|------------|------------------------------------|
| Biosolids | 0.75 FTE |
| Stormwater | Not budgeted as separate line item |

Contacts

Chas Ariss, P.E., DEQ, (208) 373-0561

Michael Le, EPA, Biosolids, (206) 553-1099

Misha Vakoc, EPA, Stormwater, (206) 553-6650

Jeff Kenknight, EPA, (206) 553-6641

5.3 Development of an Idaho Pollutant Discharge Elimination System Program.

Approach

DEQ will continue the development of an IPDES program and application consistent with the requirements of the Clean Water Act, federal regulations, and state authority. The application is targeted for completion and submittal to EPA by September 1, 2016, consistent with state legislation.

Outputs

- a. DEQ will coordinate a technical advisory committee to work through the development of guidance documents necessary for implementation of the IPDES program. DEQ will also hire staff in 2016 to assist in program development as previously authorized by state legislation.
- b. EPA will provide support to the development of the work products cited above. EPA support will include review of draft documents for consistency with national regulations and policy, provide examples of work products used elsewhere in Region 10 and nationally as necessary, and provide other input as requested by DEQ. EPA Region 10 will also involve appropriate EPA headquarters offices, including the Office of Water, Office of General Council, and Office of Compliance and Enforcement, with the goal of producing work products that are complete and ultimately can meet EPA approvability criteria.
- c. EPA and DEQ will begin to build NPDES capacity in Idaho in advance of program approval. Efforts in 2016 will focus on drafting and reviewing the program description and associated guidance documents. Once the application for program

- approval has been submitted, DEQ and EPA will develop strategies such as training, work share, and work-shadowing efforts for example.
- d. EPA and DEQ will negotiate terms of the MOA. Efforts in 2016 will focus on crafting a final draft MOA that may be submitted with the application for delegated authority.

Schedule

Development of guidance documents will begin in late 2015. Legislative review of the rules regarding the IPDES program will be in early 2016. Negotiations on the MOA will begin in late 2015 and continue until the application is submitted in September 2016.

Contacts

Mary Anne Nelson, DEQ, (208) 373-0291

Karen Burgess, EPA, (206) 553-1644

5.4 Component commitments.

EPA Commitments

- a. Work with DEQ to determine the annual NPDES compliance inspection schedule by November 15.
- b. Implement EPA's CY 2016–2017 operating plan to reduce the backlog of expired NPDES permits and issue permits to new sources. This plan, with the list of targeted permits, will be shared with DEQ and will be updated yearly so that DEQ can properly manage §401 certification and mixing zone evaluation responsibilities.
- c. Provide a schedule of Phase 2 MS4 stormwater, construction, and all other stormwater-related permitting activities by January 2016.
- d. EPA shall provide DEQ with specific points of contact within the EPA Center for Excellence in Biosolids for technical assistance and guidance in addressing biosolid issues in Idaho.

DEQ Commitments

- a. Submit completed NPDES compliance inspection reports and complaint response inspection reports in a timely manner to Maria Lopez, lopez.maria@epa.gov, EPA.
- b. On a quarterly basis, provide a report to Maria Lopez, EPA, summarizing inspections conducted.
- c. Complete NPDES draft permit reviews and §401 certifications.
- d. Review wastewater construction plans.
- e. Review proposals for land application of biosolids and domestic septage and approve or disapprove land application sites in accordance with state regulations.
- f. Assist EPA in implementing the Phase 2 MS4 Stormwater Program in Idaho by providing input into permitting.
- g. Track sanitary sewer overflows and report to EPA on an annual basis.
- h. Communicate enforcement actions of interest with EPA.
- i. Maintain NPDES credentialing program at DEQ to provide an avenue for new employees to become credentialed inspectors.

Component 6. Drinking Water and Wastewater Loan Programs

Program Goal

The goal of the Drinking Water and Wastewater Loan Programs is to improve environmental protection and public health through construction, operation, maintenance, and management of drinking water, NPS, and point source treatment facilities.

Program Activities

- Manage the Drinking Water and Water Pollution Control Loan Programs.
- Fund NPS projects.
- Manage the state grant programs for drinking water and wastewater projects.
- Manage congressionally mandated projects funded through State and Tribal Assistance Grants (STAG).

Program Contacts

Tim Wendland, DEQ, (208) 373-0439

Cyndi Grafe, Drinking Water, EPA, (208) 378-5771

Bryan Fiedorczyk, Wastewater, EPA, (206) 553-0506

Joel Salter, EPA, (503) 326-2653

Kenneth J. Fisher, EPA, (907) 586-7658

Program Commitments

Priorities

- Fully utilize capacity development set-aside resources made available to issue drinking water planning grants and loan funds to improve drinking water system infrastructure.
- Fully utilize wastewater loan fee resources made available to issue planning grants, loan funds to improve wastewater system infrastructure, and issue NPS sponsorship loans for purposes that could include point source solutions to NPS problems and agricultural activities. Coordinate with the §319 NPS Program and TMDL Program.
- Report on environmental and public health outcomes by completing an environmental or public health benefits evaluation for each project in EPA's environmental benefits system for the Clean Water State Revolving Fund (CWSRF) or public health benefits system for the Drinking Water State Revolving Fund (DWSRF).
- Implement, monitor, and control procedural frameworks to achieve the following:
 - Sponsor NPS projects through §212 point source loans.
 - Provide facility planning grants that allow optional environmental assessments.
 - Investigate the feasibility of using bonding to meet growing wastewater loan demand.

6.1 Manage the Drinking Water and Wastewater Loan Programs.

Approach

For each loan program, execute loan commitments for at least an amount equal to that required and defined in federal statute. Maintain correct federal and state funding ratios by drawing federal funds for each loan program in the proper proportional amounts.

Outputs

- a. Negotiate loan agreements regarding projects listed on the Intended Use Plans in a timely manner for amounts consistent with federal requirements.
- b. Prepare annual reports for CWSRF and DWSRF.
- c. Gather and assess comments relating to web-based loan handbooks. Make minor corrections to the handbooks on an ad hoc basis, while collecting substantive comments for a follow-up public comment period.
- d. Support CWSRF administrative costs, planning efforts, and wastewater operator training efforts with CWSRF loan fee revenues.
- e. Transfer excess DWSRF 4% administrative set-aside funds into the loan fund.
- f. Report CWSRF fee use in the CWSRF annual report.
- g. Negotiate changes to State Environmental Review Process (SERP) and Operating Agreements to incorporate changes in the *NEPA* environment that have occurred since the SERP was originally crafted.

Schedule

Loans are negotiated throughout the state fiscal year (SFY), which ends June 30. The Water Pollution Control annual report is due 90 days after the end of the SFY, and the Drinking Water Annual Report is due 120 days after the end of the SFY.

Funding

This activity will be funded by the 4% administrative set-aside portion of both SRFs, loan fees, and one-time state funds. Eight work years will be budgeted to the SRFs. This includes DEQ's state office Water Quality Division, Technical Services Division, and regional office staff.

Contacts

Tim Wendland, DEQ, (208) 373-0439

Cyndi Grafe, Drinking Water, EPA, (208) 378-5771

Bryan Fiedorczyk, Wastewater, EPA, (206) 553-0506

6.2 Fund nonpoint source projects.**Approach**

Fund nonpoint source projects to improve surface water quality in areas where TMDLs have been developed and approved, and fund ground water quality improvement projects in areas where ground water is degraded.

Outputs

A priority list for SFY 2016 was prepared and issued for public comment.

Schedule

The Board of Environmental Quality will act upon the proposed SFY 2017 Intended Use Plan, May 2016.

Funding

DEQ staff time used for making NPS sponsorship project loans will be charged against the 4% CWSRF set-aside for administration and state appropriation.

Contacts

Tim Wendland, DEQ, (208) 373-0439

Bryan Fiedorczyk, Wastewater, EPA, (206) 553-0506

6.3 Conduct planning grant programs for drinking water and wastewater projects.**Approach**

Develop an annual wastewater and drinking water grant project priority list.

Outputs

- a. Compile priority lists of grant projects in May 2016.
- b. Review applications from potential applicants expected to submit grant applications during SFY 2016.
- c. Report DWSRF set-aside expenditures for this activity via the DWSRF program annual report.

Schedule

Grants are negotiated throughout the SFY, which ends June 30.

Funding

Funding for grant program's staff is provided through the CWSRF and DWSRF fee revenues and DWSRF set-asides. Approximately 4.4 work years statewide is typically budgeted.

Contacts

Tim Wendland, DEQ, (208) 373-0439

Cyndi Grafe, Drinking Water, EPA, (208) 378-5771

Bryan Fiedorczyk, Wastewater, EPA, (206) 553-0506

6.4 Manage congressionally mandated STAG-funded projects.**Approach**

Manage congressionally mandated STAG-funded projects to ensure timely project completion.

Outputs

Process reimbursement requests, review change orders, conduct project inspections, and prepare closeout packages, as detailed in the 2011 DEQ 3% set-aside program grant (scope of work) documents. It is expected that the final Special Appropriation Act Project grants will be finalized during CY 2016.

Funding

Funding for DEQ staff time for administration and oversight of these EPA wastewater and drinking water construction grant projects will come from the 3% set-aside monies in the respective grants awarded to DEQ.

Contacts

Tim Wendland, DEQ, (208) 373-0439

Joel Salter, EPA, (503) 326-2653

6.5 Monitor implementation of the Clean Water Act reauthorization changes.**Approach**

Monitor implementation of Clean Water Act reauthorization CWSRF impacts in loan agreements signed post-October 1, 2014.

Outputs

- a. Market changes to stakeholders.
- b. Prepare statute and rule changes to incorporate Clean Water Act reauthorization changes.
- c. Amend CWSRF Operating Agreement to incorporate Clean Water Act reauthorization.

Funding

Funding for this evaluation will consist of 4% CWSRF and DWSRF administration set-aside funds.

Contacts

Tim Wendland, DEQ, (208) 373-0439

Bryan Fiedorczyk, EPA, (206) 553-0506

6.6 Component commitments.**DEQ Commitments**

- a. Follow all terms and conditions outlined in the operating agreements, yearly capitalization grant agreements, federal statutes, regulations, and published national guidance and policies for both SRF loan programs.
- b. Submit annual SRF reports to EPA as required.
- c. Complete annual development, review, and modification of the Intended Use Plans for both SRF loan programs.
- d. Pursue including NPS projects in traditional CWSRF loans.

EPA Commitments

- a. Conduct timely annual reviews and written reports of both SRF loan programs.
- b. Provide DEQ with advice and consultation as requested and updated program guidance from EPA headquarters as it becomes available.
- c. Provide timely, informative, and accurate advice regarding SRF program implementation and development questions from DEQ.

Component 7. Safe Drinking Water Program

Program Goal

The goal of DEQ's Safe Drinking Water Program is to assist and support public water systems to ensure the reliable delivery of safe drinking water.

Objectives

- Public water systems that are located, designed, constructed, operated, maintained, and protected to reliably meet drinking water health-based standards.
- Public water systems serving drinking water that meets all health-based standards.

Program Contacts

Jerri Henry, DEQ, (208) 373-0471

Marie Jennings, Drinking Water Unit Manager, EPA, (206) 553-1893

Peter Contreras, Office of Compliance and Enforcement, Ground Water Unit Manager, EPA, (206) 553-6708

Outcomes, Targets, and Activities

7.1 Public health outcomes and indicators.

- a. Successfully address statewide compliance issues according to EPA's 2009 Drinking Water Enforcement Response Policy (ERP).
- b. Absence of reported waterborne disease outbreaks.

7.2 Outcome and output targets.

- a. Percent of *person months* (i.e., all persons served by community water systems over 12 months—EPA's Strategic Target SP-2) during which community water systems provide drinking water that meets all applicable health-based drinking water standards. Target = 95%.

The state acknowledges the additional EPA national performance measures to assess public water systems serving drinking water that meets all health-based standards (Subobjective 2.1.1, percent of the *population*, and Strategic Target SP-1, percent of *community water systems*). For the state reporting measure, DEQ uses the *percent of person months*. However, the state reviews and tracks the other national quarterly performance measure results provided by EPA.

- b. *Timely and appropriate* response (2009 ERP) of 100 public water systems listed on the Enforcement Targeting Tool (ETT) (2009 ERP) list between July 2015 and June 2016.

7.3 Activities/performance measures.

| | |
|---|---|
| <p>Objective 1: Public water systems that are located, designed, constructed, operated, maintained, and protected to reliably meet drinking water health-based standards.</p> | <p>Objective 2: Public water systems serving drinking water that meets all health-based drinking water standards.</p> |
| <p>Activities/performance measures for contamination prevention and supporting activities:</p> <ul style="list-style-type: none"> • Number of sanitary surveys completed • Percentage of public water systems with current sanitary surveys • Percentage of community water systems that have current sanitary surveys (3-year frequency, except 5-year frequency for outstanding performers) • Number of engineering projects completed • Number of outreach products | <p>Activities/performance measures for compliance indicators and supporting activities:</p> <ul style="list-style-type: none"> • Percentage of public water systems in significant compliance with health-based drinking water standards • Number of acute microbial and surface water treatment failure events resolved • Number of chemical maximum contaminant level events addressed • Percentage of systems with a consent order in compliance with the terms of their consent order |

Program Commitments

7.4 DEQ and EPA drinking water partnership commitments and schedule.

- a. Coordinate quarterly with EPA’s Office of Compliance and Enforcement to discuss the ETT and compliance issues.
- b. Coordinate at least twice per year to discuss Drinking Water Program performance. At least one of the meetings will be face-to-face. Timing usually coincides with the Idaho PPA schedule and DWSRF annual review (spring/fall).
- c. Maintain collaboration on state laboratory certification.
- d. Cooperate and coordinate on issues related to the new rule implementation.
- e. Cooperate to resolve data quality issues.
- f. Consult in situations concerning imminent and substantial endangerment to public as outlined in 7.6.h below.

7.5 DEQ agrees to the following:

- a. Perform the primary responsibility to enforce the Safe Drinking Water Act (SDWA) and associated regulations where recognized through approval of state regulations, acceptance of state programs, and formal delegation of authority from EPA.
- b. Timely upload the Safe Drinking Water Information System (SDWIS/state) data to EPA.
- c. Provide EPA with performance measure reports in the format used by DEQ twice per year.
- d. Implement new rules on schedule unless formal extension agreements are made in accordance with 40 CFR 142.12.

- e. Take timely and appropriate enforcement actions to address SDWA violations 2009 (ERP). Provide quarterly report on the status of public water systems identified as a *priority* for returning to compliance or an enforcement response. Provide copies of enforcement orders upon EPA's request.
- f. Respond to findings in the EPA annual program evaluation by addressing recommendations and implementing necessary actions as appropriate.

7.6 EPA agrees to the following:

- a. Develop standard operating procedures to provide courtesy notifications and collaborate with DEQ regarding action EPA takes in Idaho related to safe drinking water.
- b. Provide DEQ quarterly with the ETT list and national performance measure results for Idaho.
- c. Submit Drinking Water Program requests for information and work tasks with and through the DEQ state program office only.
- d. Reduce administrative demands on the state by limiting reporting requirements to semiannual reports and obtaining necessary reports and information from SDWIS when possible.
- e. Provide rule interpretation and assistance, advance notification of training opportunities, and updates of Unregulated Contaminant Monitoring Rule implementation and other relevant issues.
- f. Attend Idaho Drinking Water Advisory Committee meetings via teleconference or in person as time permits.
- g. Annually review and evaluate Idaho's progress in implementing the provisions and requirements of this agreement and other agreements documenting delegations of responsibility from EPA to the state.
- h. EPA may become involved in SDWA enforcement at public water systems when an imminent and substantial endangerment to public health exists (SDWA Section 1431); the state requests EPA's enforcement support; or EPA deems that the state's response to addressing a noncompliant public water system has not been timely or appropriate. After consultation with the state, EPA also reserves its right to consider enforcement against public water systems, which are not identified as a *priority* for enforcement under the ERP where the state has not taken timely or appropriate action.

7.7 Safe Drinking Water Program resources matrix.

| Activities | PWSS Base Grant | DWSRF 2% Technical Assistance Set-Aside (1452(g)) | DWSRF Capacity Development Set-Aside (1452(k)) | PWSS 10% Set-Aside (1452(g)(2)) | Hours (FTEs) |
|---|-----------------|---|--|---------------------------------|----------------|
| Report data to EPA using SDWIS/state | X | — | — | X | 8,773 (4.22) |
| Submit primacy applications for, and implement requirements of new state rules | X | — | — | — | 5,110 (2.46) |
| Address compliance for surface water systems | X | — | — | — | 344 (0.17) |
| Conduct sanitary surveys | X | — | X | — | 6,535 (3.14) |
| Implement capacity development strategy | X | — | X | — | 1,403 (0.67) |
| Review plans and specifications | X | X | — | — | 14,843 (7.14) |
| Provide drinking water engineering services and support | X | — | — | — | 603 (0.29) |
| Perform drinking water primacy core activities (public education, fee assessments, public health district contract management, laboratory certification program, consumer confidence reports, annual confidence reports, drinking water security, and drinking water operating licenses). | X | — | — | X | 21,391 (10.28) |

| Idaho DEQ | EPA Region 10 |
|--|---|
| Jerri Henry, Drinking Water Program Manager (208) 373-0471 | Marie Jennings, Unit Drinking Water Manager (206) 553-1893 |
| Curtis Stoehr, Field Services Lead and Capacity Development/OpCert (208) 373-0542 | Kenneth Fisher, operator certification, capacity development, Area-Wide Optimization Plan (907) 586-7658 |
| Bryan Zibbell, Rule/Policy and Compliance/Enforcement Lead (208) 373-0343 | Eric Winiacki, compliance and enforcement measures and ETT list, water team security (206) 553-6904 Adam Baron, (206) 553-6361 |
| Megan Larson, Regulatory Specialist IOC, SOC, VOC, Lead and Copper Rule, Radionuclides Rule (208) 373-0475 | Cyndi Grafe, Idaho Field Operations Idaho PWSS project officer and Revised Total Coliform Rule (208) 378-5771 |
| VACANT, Rules Coordinator Surface water treatment rules, disinfection byproduct rules, engineering rules | Rick Green, Grants and Loans DWSRF and Set-Asides Project Officer (206) 553-8504 |
| Monica Van Bussum, SDWIS/State Coordinator; TCR/RTCR, GWR Lead (208) 373-0111 | TBD, Microbial Rules, Ground Water Rule, Disinfection Byproduct Rules, Lead and Copper Rule, Consumer Confidence Rule, Public Notification Rule, Revised Total Coliform Rule |
| Tamarra Golightly, Administrative Assistant (208) 373-0409 | Jane Schuster, SDWIS/Federal (206) 553-1096 |
| | Fredianne Gray, Chemical Rules, Unregulated Contaminant Monitoring Regulations, laboratory certifications, contaminant candidate list, nitrates, Radionuclides Rule (206) 553-6387 |