2007-2009

EnPPA

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Environmental Performance Partnership Agreemen

Indiana Department of Environmental Management
and
U.S. Environmental Protection Agency Region 5

Authorizing Signatures

The Indiana Department of Environmental Management and U.S. Environmental Protection Agency, Region 5 2007-2009 Environmental Performance Partnership Agreement is approved on the date of the last signature received.

For the State of Indiana:

Thomas W. Easterly, Commissioner
Indiana Department of Environmental Management

JUNE 29, 2007
Date

For the U.S. Environmental Protection Agency, Region 5:

Mary A. Gade, Regional Administrator
U.S. Environmental Protection Agency, Region 5

July 11, 2007
Date

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Environmental Performance Partnership Agreement
between
Indiana Department of Environmental Management
and
U.S. Environmental Protection Agency Region 5
July 1, 2007 – June 30, 2009

Purpose of the EnPPA

The Indiana Department of Environmental Management (IDEM) and the United States Environmental Protection Agency (USEPA) Region 5 are entering into their sixth (6th) Environmental Performance Partnership Agreement (EnPPA). The biennial agreement identifies program specific priorities and program specific joint priorities between the two (2) agencies. The purpose of this agreement is:

1. To determine a specific list of program elements for primary focus;
2. To develop a general plan of action for each element listed;
3. To describe the roles and responsibilities of each agency in addressing each element;
4. To set the term of this agreement from July 1, 2007, to June 30, 2009.

The EnPPA is a product of the National Environmental Performance Partnership System (NEPPS), a joint initiative of the USEPA and Environmental Council of States (ECOS). The EnPPA, formed under NEPPS, is designed to provide states and USEPA with flexibility in achieving environmental results and to enhance accountability in achieving environmental progress. The Performance Partnership Grant (PPG) is the federal grant used to fund many of the EnPPA activities.

Scope of the EnPPA

The EnPPA, including the general work plans, primarily focuses on activities that are funded by PPG dollars. The scope of the EnPPA by no means fully encompasses the entire work load of each agency, but is intended to compliment IDEM's strategies and USEPA's regional work plan. It is designed to be a concise strategic document to be used to focus limited resources on specific outcomes. In addition to the general work plans described within the EnPPA, IDEM has more detailed work plans to be used internally to address and complete the elements committed to within this agreement.

The Federal funding component of this EnPPA is equivalent to the level of effort requisite to accomplish the initiatives set forth in this agreement. In the event of a Federal funding shortfall IDEM reserves the right to renegotiate the EnPPA agreement with the USEPA Region 5 to determine which programs can be scaled back to match funding resources so as not to impose undue financial hardship on the State of Indiana.

Grants Covered Under the EnPPA

IDEM in keeping with recent national trends includes the use of a Performance Partnership Grant (PPG) structure as part of its Performance Partnership Agreement (PPA). The PPG structure has successfully provided IDEM more flexibility in the use of Federal financial resources to address environmental issues using a multifaceted approach, and has reduced the administrative burden of having numerous specific categorical grants tied to work plans. The PPG allows for the continuance of key resource investments that have already been determined to be priority

activities. The Federal and the state funding in the current PPG are $24.14 million and $19.57 million respectively. The proposed general categories are as follows:

1. Clean Water Act (CWA) Section 106-activities under CFDA 66.419;
2. Public Water System Supervision (PWSS)-activities under CFDA 66.432;
3. Watershed Section 319(h)-activities under CFDA 66.460;
4. Air Section 105-activities under CFDA 66.001;
5. Air $PM_{2.5}$ Section 103-activities under CFDA 66.034;
6. Underground Storage Tank-activities under CFDA 66.805 & 66.816;
7. Resource Conservation Recovery Act (RCRA) (Hazardous Waste Permitting and Great Lakes Initiative)-activities under CFDA 66.801 & 66.808;
8. Polychlorinated Biphenyl(s) PCB-activities under CFDA 66.701;
9. Corrective Action-activities under CFDA 66.801.

Non-PPG grant activity covered in the EnPPA include components from the following sources:

1. Wetlands Development Grant Program CVA 104 (b)(3)–activities under CFDA 66.479;
2. Outreach Operator Training 104(g)(1)-activities under CFDA 66.467;
3. Counter Terrorism SDWA 1442–activities under CFDA 66.474;
4. Clean School Bus USA-activities under CFDA 66.036.

With the receipt, and use, of Federal funds towards an endeavor, comes the responsibility of the recipient to track the success of the program and to show results. To achieve the goals of transparent grants management, IDEM has incorporated standard operating procedures (SOPs), a grants management policy and a grant data tracking system to direct the application, receipt, use and closeout of all grants the Agency receives. This approach will provide for easy information sharing and interaction between the awarding agencies and IDEM.

Development and Elements of the EnPPA

The development process:

1. **Initial List**: An initial list of EnPPA priorities began with IDEM team members discussing and listing the past, present and future goals of each program area.
2. **Draft Priority List**: The draft priority list was developed from the initial list, focusing on those priorities that were funded primarily by USEPA grants.
3. **Draft EnPPA**: The draft EnPPA was developed from the priority list and presented to USEPA Region 5 during a kick-off meeting held in Chicago on April 10, 2007.
4. **Program Work Group Discussion**: Program groups from both agencies met jointly to discuss work plans, goals and EnPPA priorities. (The joint land group meeting, via teleconference, was held on March 21, 2007, the air group meeting was held on March 19, 2007 and the water group meeting, via teleconference, was held on March 21, 2007.)
5. **Final EnPPA**: The final EnPPA was a result of shared discussions and mutual agreement between the agencies.

The elements:

1. The elements of the EnPPA provide a framework for accountabilities by clearly identifying IDEM and USEPA actions, roles and specific program area contacts.

2. The elements of the EnPPA require a joint assessment. The joint assessment will be an annual discussion between IDEM and USEPA at the end of year one. The joint assessment will highlight successful program achievements; identify areas that need improvement and/or additional resources; provide a mechanism for discussions and adjustments in specific program directions or approaches.
3. The reporting elements of the EnPPA will be interpreted into a formal closure report.
4. The EnPPA is viewed as a "living document" that is flexible and can be modified, upon agreement, to reflect changes in IDEM and USEPA needs.

Roles of IDEM and USEPA

This agreement defines the roles that both IDEM and USEPA Region 5 will undertake to meet the program commitments. IDEM and USEPA recognize the primary role of IDEM in administering Federal environmental programs delegated to the state under Federal law and in carrying out state programs prescribed under State law. USEPA Region 5's role in assisting IDEM includes: addressing multi-State or national issues directly; implementing programs not delegated to IDEM; and working on targeted sectors, watersheds or airsheds in conjunction with IDEM. Several activities are common to both IDEM and USEPA R5, such as permitting, compliance, enforcement, monitoring and outreach.

Compliance and Enforcement Assurance

Program specific compliance and enforcement activities accomplished during the term of this EnPPA are included in the detailed branch level priorities and the State program specific plans. The following tenets serve as the foundation for IDEM-USEPA relationships with respect to Compliance and Enforcement activities:

- Utilize the most effective application of compliance tools to encourage regulated facilities to maintain and, where possible, exceed compliance with environmental laws (e.g., compliance assistance, compliance assurance, administrative/civil enforcement and criminal prosecution).
- Utilize joint preplanning to coordinate priorities, maximize agency resources, avoid duplication of efforts, eliminate "surprises" and institutionalize communication.
- Manage for internal and/or external environmental results.

In addition to providing guidance to IDEM, USEPA has a continuing role in environmental protection in the State of Indiana. USEPA carries out its responsibilities in a variety of ways, including:

- Acting as an environmental steward, ensuring that national standards for the protection of human health and environment are implemented, monitored and enforced consistently in all States.
- Assisting in conducting inspections and enforcement actions.
- Providing compliance and technical assistance to the State and its regulated entities.
- Providing science based information to the State and its regulated entities.

Under this EnPPA agreement, IDEM and USEPA retain their authorities and responsibilities to conduct enforcement and compliance assistance. Enforcement will be accomplished in the spirit of cooperation and trust. Specific Federal enforcement and compliance assistance responsibilities include, but are not limited to, the following:

- Working on National Priorities and Regional Priorities.

- Ensuring a level playing field and National consistency across State boundaries.
- Addressing Interstate and international pollution (e.g., watersheds and ambient air).
- Addressing criminal violations.
- Conducting enforcement to assure compliance with Federal consent decrees, consent agreements, Federal interagency agreements, judgments and orders.
- Conducting State reviews in accordance with the National State Review Framework.

Quality Management Plans

IDEM has a Quality Management Plan (QMP) in place effective through April 17, 2012. The Agency QMP describes the organizational structure of the Agency quality system; quantifies the level of Agency resources committed to Quality Assurance/Quality Control (QA/QC) issues; documents Agency quality system QA/QC policies and practices; catalogs Agency QA/QC-related training, purchasing and document and record management practices; describes Agency planning tools and explains implementation practices; and establishes Agency quality system assessment and improvement strategies.

The Agency has in place Agency-wide QA/QC policies, standard operating procedures (SOPs) and quality assurance project plans (QAPPs). Under the Agency "Policy, SOP, and QAPP Documentation Policy," each QA-related policy and each program-level SOP must be reviewed every two (2) years, and revised to reflect any changes to associated statutes, rules or processes. Meanwhile, consistent with USEPA's approval of the IDEM QMP, IDEM will continue to submit project and program Quality Assurance Project Plans (QAPPs) to USEPA for all applicable environmental programs including Superfund pre-remedial and remedial activities under 40 CFR 35 Subpart O and Superfund removal program under 40 CFR 300. IDEM's submissions during the coming year to USEPA Region 5 Waste, Pesticides and Toxics Division (WPTD) will include inspection program QAPPs for IDEM's Leaking Underground Storage Tank (LUST), RCRA Subtitle C, TSCA PCB and Asbestos programs.

Reporting

IDEM will continue to report to USEPA the necessary information as required and agreed upon, including required timelines. It is recognized that reporting requirements beyond those specifically mentioned in this agreement do exist. Those requirements often relate to populating national databases or to tracking performance against priority activities identified in the internal IDEM work plans. These requirements may be embodied in a variety of existing agreements and are not reiterated in this agreement. IDEM will reference its web site and other existing reports as supporting documentation for the EnPPA and the PPG. Both IDEM and USEPA will report through the Joint Assessment Process.

Joint Priorities and Action Items

Joint priorities represent a subset of environmental program responsibilities that IDEM and USEPA Region 5 agree represent investment priorities for the EnPPA period for various reasons, for example:

1. The program is an important, newly developing initiative that requires the attention of both IDEM and USEPA Region 5 to adequately develop.
2. The program area is at risk of inadequately functioning, and the deficiency represents a significant vulnerability to the integrity of the environmental protection program.

3. The program represents a long-term strategic investment opportunity.

The program offers the opportunity to demonstrate innovations to promote environmental improvements or enable efficiency enhancements.

IDEM and USEPA Region 5 met and identified Joint Priorities.

Joint Priorities

Water
- Work on impaired waters (targeted watersheds) through program implementation, coordination with partners and monitoring to meet water quality standards on a waterbody and watershed basis;
- Issuance of expired permits and addressing Combined Sewer Overflow (CSOs), Long Term Control Plans (LTCPs) and Sanitary Sewer Overflow (SSOs);
- Sustainable Infrastructure.

Air
- Midwest Diesel, Renewable Fuels and High Efficiency Energy Generation Initiatives;
- Air Toxics Study in Southwest Indianapolis;
- Identification and assessment of $PM_{2.5}$ sources;
- Develop legal mechanism to issue permits for emission control projects that are required to meet the Clean Air Interstate Rule (CAIR) and the Clean Air Mercury Rule (CAMR) requirements that may cause collateral emission increases.

Waste/ Land
- Indiana Harbor and Shipping Canal & Grand Calumet River, are areas of concern;
- Re-evaluate recycling model for determination of proper diversion rates;
- Increase inspection of Resource Conservation Recovery Act (RCRA) non-notifiers.

ECAT/ OPPTA
- Comprehensive Local Environmental Action Network (CLEAN) Program;
- Environmental Resource Plan (ERP) model initiatives, all three (3) programs;
- Inspection and Permitting Flexibility Strategy, all three (3) programs.

Agency/ Homeland Security
- USEPA and IDEM will work jointly to develop an Incident Debris Plan;
- USEPA and IDEM will work jointly in the development, monitoring and marketing of the Indiana Water/Wastewater Agency Response Network (INWARN) system;
- USEPA and IDEM will work jointly to develop a mechanism to address permits, variances and waivers during an emergency crisis.

IDEM and USEPA met and identified Action Items. Action Items are items that can be worked on independently and are not necessarily addressed within the EnPPA.

Action Items

Water
- Work on impaired waters (specific watershed approach) through program implementation, coordination with partners and monitoring to meet water quality standards on a waterbody and watershed basis;
- Long Term Control Plans (LTCPs) IDEM to continue to review, approve and monitor implementation, USEPA to review consent decree process;
- Integrated Compliance Information System (ICIS) data transfer from Permit Compliance System (PCS).

Air	- Transition of lead program to Indiana State Department of Health (ISDH); - Clean Air Interstate Rule (CAIR), Clean Air Mercury Rule (CAMR) implementation; - State Implementation Plan (SIP) approval.
Waste/ Land	- Determine 2008 Government Performance and Results Act (GPRA) Baseline; - Energy Policy Act of 2005 implementation; - Resource Conservation Recovery Act (RCRA) non-notifiers.
ECAT/ OPPTA	- Develop resource flexibility strategy; - Lean concepts and permitting roadmap; - Environmental Resource Program (ERP) model and permit flexibility initiatives, all three (3) programs.

Joint Planning and Evaluation Process

IDEM and USEPA Region 5 both agree that it is important to clearly articulate how all the components of the performance partnership are evaluated. In order to evaluate this agreement and complete the previous one, both agencies will participate in a joint planning and evaluation process. The process timelines is as follows:

Actions	Deadlines
2007-2009 EnPPA Begins	July 1, 2007
Final Environmental Conditions Report (2005-2007 EnPPA)	September 30, 2007
USEPA Evaluation of State's Final Report (2005-2007 EnPPA)	December 2007
Joint Assessment Process	June 2008
Joint Assessment Process Conditions Report	Sept. 30, 2008
USEPA Region 5's Evaluation of Report	December 2008
Senior Management Planning Meeting (2009-2011 EnPPA)	April 2009
IDEM/USEPA Program-to-Program Meetings (2009-2011 EnPPA)	April/May 2009
Workplan Negotiation (2009-2011 EnPPA)	April 2009
Workplan Finalized (2009-2011 EnPPA)	May 2009
Draft EnPPA Finalized (2009-2011 EnPPA)	June 2009
2009-2011 EnPPA Begins	July 1, 2009
2007-2009 EnPPA Final Environmental Conditions Report	Sept. 30, 2009

The joint assessment process for this agreement will:

- Provide general discussion, measurements of outcomes and analyze the environmental and programmatic results of each element;
- Identify emerging issues, environmental trends and strategies for improvement;
- Provide flexibility in both form and substance, as warranted by program performance;
- Seek to eliminate duplicative or unnecessary efforts and reporting;
- Respond with appropriate solutions, including redirecting goals and resources;
- Encourage IDEM to find innovative program implementation alternatives, as long as the desired result is able to be measured and achieved.

The success of each outcome of this agreement relies on clear, constructive communication and the commitment of IDEM and USEPA Region 5 to work together to implement IDEM's **Plan-Do-Check-Improve** model, to solve problems and improve the programs. If any differences exist on specific issues or problems, IDEM and USEPA Region 5 should move quickly to resolve them at the staff level or elevate the issue through the dispute resolution process in order to gain resolution.

Mutual Accountability

The approach from direct oversight to mutual accountability and joint assessment is a shift from the traditional approach. IDEM and USEPA Region 5 will jointly assess each program element and determine the appropriate course change, as needed. USEPA Region 5 will review and act on new regulations in program areas that impact Indiana's authorization or where Federal statute or regulation requires USEPA review and approval of State actions (e.g., water quality standards).

Dispute Resolution Process

IDEM and USEPA Region 5 will use the following agreed-upon dispute resolution process to handle the conflicts that may arise as we execute this agreement. We will treat the resolution process as an opportunity to improve our joint efforts and not as an indication of failure. For the purpose of this agreement, the following definitions will apply:

Dispute: Any disagreement over an issue that prevents a matter from going forward.
Resolution Process: A process whereby the parties move from disagreement to agreement over an issue.

Informal Dispute Resolution Guiding Principles

- Recognize conflict as a normal part of the state/federal relationship;
- Approach disagreement as a mutual problem requiring efforts from both agencies to resolve;
- Approach the conflict as an opportunity to improve joint efforts;
- Aim for resolution at the staff level, while keeping management informed;
- Disclose underlying assumptions, frames of reference and other driving forces;
- Clearly differentiate positions and check understanding of content and process with all appropriate or affected parties;
- Document discussions to minimize future misunderstandings;
- Pay attention to time frames and/or deadlines and escalate quickly when necessary.

Formal Conflict Resolution

There are several formalized programmatic conflict resolution procedures that may need to be invoked if the informal route has failed to resolve all issues. Examples include:

- 40 CFR 31.70 (outlines the formal grant dispute procedures);
- National Pollutant Discharge Elimination System (NPDES) conflict resolution procedure;
- Superfund program dispute resolution contract that provides neutral third parties to facilitate conflict resolution for projects accepted into the program.

For matters involving this agreement, the following procedures will be utilized:

1. Principle: Disputes should be resolved at the front line or staff level, when feasible.

2. Time frame: Disputes should be resolved as quickly as possible but within two (2) weeks of the issue arising at the staff level. If unresolved at the end of two (2) weeks, the issue should be raised to the next level of each agency.
3. Escalation: When there is no resolution of the issue and the two (2) weeks have passed, there should be comparable escalation in each agency, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each agency, until resolution is obtained.

Environmental Conditions in Indiana

To put the elements of this agreement into context, it is useful to review the progress achieved in each program area and the current status of our waters, air and land in Indiana. A summary of Indiana's environmental conditions are as follows and are used as the basic elements listed in each area work plan:

Water

Indiana surface waters today are decidedly cleaner than they were decades ago. Indiana's probabilistic surface water monitoring strategy has allowed a comprehensive, basin-scale assessment of all Indiana rivers and streams. To date, IDEM has site-specifically assessed approximately 36% of Indiana's stream miles for recreational uses and has found that 32% (7,652 miles) of those assessed are fully supporting of full body contact recreational uses. Approximately 53% of Indiana's stream miles have been assessed for aquatic life use support, and 82% of these (13,641 miles) were found to be fully supporting of healthy aquatic communities (macro invertebrates and/or fish).

IDEM continues to identify general causes and sources of surface water impairments within the State. Many of the specific outputs listed within the water work plan section of this agreement are intended to focus and address water impairments. The 2006 303(d) List of Impaired Waters identifies waterbodies not meeting Indiana's water quality standards. IDEM teams are continuing to develop total maximum daily load calculations (TMDLs), as required by Section 303(d) of the Clean Water Act (CWA), to identify sources contributing to the impairment of Indiana's surface water. IDEM continues to target impaired waterbodies for water quality improvement projects and provides support for those projects that will reduce non-point source pollution through utilization of the 319 grant funds.

IDEM recognizes the need to timely issue NPDES permits and maintain adequate compliance and enforcement of those permits to reduce water impairment resulting from point sources. During the 2005-2007 EnPPA cycle, IDEM completely eliminated the backlog of expired municipal NPDES permits and significantly reduced the number of expired industrial NPDES permits. IDEM has an aggressive goal to completely eliminate the backlog of expired NPDES permits with this EnPPA cycle.

IDEM understands the importance of having LTCPs in place to reduce the incidence of CSO, which also contribute to the impairment of Indiana's waters. Thirty-three (33) Indiana CSO

communities have approved LTCPs in enforceable documents.

IDEM utilizes regulatory, compliance and enforcement tools to ensure compliance with NPDES permits and long term control plans (LTCPs). IDEM continues to provide compliance assistance and other tools to help regulated communities gain a comprehensive understanding of rules, regulations and expectations, thus improving their ability to comply with applicable requirements.

Reduction of impairments is critical for the protection of Indiana's public water drinking supplies. IDEM has assessed most of Indiana's public drinking water sources. These assessments provide an inventory of potential contaminants and a determination of water system susceptibility to contamination. IDEM will work with public water supply systems to help them understand the assessment information and develop and implement plans to protect drinking water sources. Additionally, IDEM utilizes regulatory, compliance and enforcement tools to ensure the safety of Indiana's public drinking water supplies.

IDEM's Office of Water Quality (OWQ) is committed to meet its obligations outlined within this agreement. OWQ is working to identify additional resources necessary to meet those commitments, including trade-offs that may result in discussions during the execution of this agreement.

Air

Indiana's air quality has improved significantly in the last seventeen (17) years. Regulatory programs aimed at emission reductions for vehicles and industry have reduced smog and dust levels throughout the State. Voluntary programs such as ozone education and awareness, diesel retrofits and anti-idling policies have played an important role in improving Indiana's air quality. Air quality in Indiana now meets health standards set by the USEPA for ozone, sulfur dioxide, nitrogen dioxide, carbon monoxide, lead and coarse particles of dust and soot (PM_{10}), as measured by air quality monitors located across the State.

USEPA has adopted protective health standards for ozone, based on an 8-hour measurement, and standards for fine particles ($PM_{2.5}$). Initially, Indiana had twenty-four (24) counties or portions of counties that were designated non-attainment for the 8-hour ozone standard and seventeen (17) counties or portions of counties designated non-attainment for the annual $PM_{2.5}$ standard. Currently, Indiana has requested that all counties be designated attainment for the 8-hour ozone standard. Only two (2) of the original seventeen (17) counties designated by USEPA as non-attainment for $PM_{2.5}$ do not meet the current standard, and based upon the most current measured air quality, only four (4) of these counties do not meet the new standards.

Levels of air toxic chemicals are also of concern in Indiana. IDEM has been operating an air toxics monitoring network to measure and track hazardous air pollutants since 1999. IDEM has adopted into State law the national emission standards for hazardous air pollutants, which provide industry-specific control technology requirements, so that the State can enforce them. IDEM has worked to provide compliance assistance to industries subject to the standards. IDEM has developed risk assessment capabilities to investigate air toxics risks at the community level. IDEM also has facilitated voluntary programs to reduce the risks of diesel emissions, such as the

School Transportation Association of Indiana's anti-idling policy, and school bus and municipal fleet diesel retrofits.

In summary, IDEM's Office of Air Quality (OAQ) challenges include working with USEPA to achieve anticipated outcomes as a result of completing the priorities listed in the OAQ section of this agreement.

Land

Considerable progress has been made by IDEM's Office of Land Quality (OLQ). Regulations, compliance and enforcement programs aimed at addressing entities that treat, store, generate or dispose of contaminates have had significant impact on improving the quality of land in Indiana.

In addition to other programs, IDEM has and will continue to focus on corrective actions at hazardous waste facilities and leaking underground storage tanks (USTs). Considerable resources have been focused to obtain and address the environmental indicators established through the GRPA.

Additionally, significant resources will be focused to implement the Energy Policy Act of 2005. The OLQ staff is committed to continuous improvement through adaptation and development of rules and policies, including the reorganization of roles within the department to further refine protection and as a response to new technologies. Through OLQ's compliance assistance efforts, the expected outcomes include providing the regulated communities with a comprehensive understanding of rules, regulations and expectations, thus improving their ability to comply with applicable requirements.

Outlook

Indiana, in partnership with USEPA and other stakeholders, can be proud of its environmental record, but must be ready for continuing challenges. This agreement, addressing near-term focus points and program specific elements and corresponding work plans, is designed to outline those commitments. The outcomes are intended to improve environmental conditions in the State of Indiana and provide a mechanism to track the improvement.

Office of Water Quality (OWQ)

Impaired Waters List & Water Quality Report

Contact(s): a) Jody Arthur, & Marylou Renshaw b) Dennis Clark, Lee Bridges & Art Garceau	USEPA Contact(s): a) Kevin Pierard & Jonathan Burian, b) Linda Holst, Ed Hammer & Sarah Lehmann	Due Date: a) April 1, 2008 b) December 31, 2007 & December 31, 2008

USEPA Role: a) Timely review and comment on materials submitted. Provide guidance on report/list development. Provide continued support and guidance on the use of the Assessment Database. b) Provide assistance in analyzing and reporting probabilistic information; provide assistance in combining probability monitoring with other monitoring designs.

☐ a) Use the Assessment Database (ADB) to submit the Integrated Report (IR), including 303(d) list of impaired waters by established deadlines for all relevant information. Upgrade Assessment Database to ADB 2. Provide additional Integrated Report (IR) information (e.g., assessment methodology) in other appropriate formats as required by the IR Guidance.

Status:

☐ b) Monitor waters, utilizing the probabilistic monitoring design to provide sufficient data to adequately assess the status of Indiana's surface water quality, following the schedule identified in the IDEM Monitoring Strategy.

Status:

Total Maximum Daily Loads (TMDLs)

Contact(s): a) & c) Marylou Renshaw & Andrew Pelloso b) & d) Dennis Clark, Lee Bridges & Art Garceau	USEPA Contact(s): a) Kevin Pierard b-d) Linda Holst, Sarah Lehmann & Ed Hammer	Due Date: a) September 1, 2007 & September 1, 2008 b) December 31, 2007 & December 31, 2008

USEPA Role: a) Timely review and comment, and contractor assistance, b) Provide guidance/other information on identifying causes/sources of impairment.

☐ a) TMDLs on waterbody segments – seventy-five (75) TMDLs will be developed during 2007, with the number for 2008 to be determined.

Status:

☐ b) Stressor ID/Source Identification Studies – Monitor waters to provide information on sources and causes of impairments for use in the development of total maximum daily loads (TMDLs) and/or watershed plans. Follow the plans outlined in the IDEM Monitoring Strategy.

Status:

☐ c) Target resources to the five (5) accountability projects (projects identified for tracking in USEPA's Accountability Framework to capture the impact and benefits associated with non-TMDL activities).and five (5) SP-12 Watersheds (watersheds selected to demonstrate improved water quality conditions in impaired watersheds using the watershed approach) in order to eliminate one (1) or more impairments within a reasonable time period.

Status:

☐ d) IDEM will target Non-point Source (NPS) incremental funding to watersheds with impaired waters on the 303(d) list to support accountability projects/SP-12 watersheds.

Status:

☐ e) Document attainment of all water quality standards in waterbodies previously identified as impaired.

Status:

Wetland and Stream Impacts

Contact(s):Marylou Renshaw & James Robb	USEPA Contact(s): Kevin Pierard	Due Date: a) Ongoing, b) March 31, 2008

USEPA Role: Provide program assistance. Evaluate stream mining projects for possible enforcement referrals to EPA or the Corps of Engineers.

☐ a) Review applications and issue appropriate permits for wetland and stream impacts.
Status:

☐ b) In cooperation with the USEPA, provide the Corps with text to include in Corps non-jurisdictional wetland determinations to assure that the requirement to seek IDEM isolated wetland permit is specified.
Status:

☐ c) In cooperation with the Corps of Engineers and USEPA, develop a Memorandum Of Agreement (MOU) for shared responsibilities.
Status:

Office of Water Quality (OWQ) Permits

Contact(s): a) Paul Higginbotham & Jerry Dittmer b) Paul Higginbotham & Beth Tallon c) Randy Braun d) Marylou Renshaw, Randy Braun & Beth Tallon	USEPA Contact(s): a) Peter Swenson b) Peter Swenson c)-d) Brian Bell	Due Date: See below

USEPA Role: Provide timely review, technical assistance and comment and identify issues at an early stage in the process.

☐ a) Municipal NPDES Permits – Issue 95% of all identified priority backlogged NPDES permits, issue new permits within statutory timeframes.

- Issue municipal priority permits within requested timeframes.

Status:

- Maintain the backlog of municipal permits at 10% or less.

Status:

- Issue new Municipal NPDES Permits within statutory timeframes.

Status:

☐ b) Industrial NPDES Permits – Issue 95% of all identified priority backlogged NPDES permits, issue new permits within statutory timeframes.

- Issue industrial priority permits within requested timeframes.

Status:

- Reduce the backlog of major industrial permits to 10% or less by December 31, 2007.

Status:

- Reduce the backlog of minor industrial permits to 10% or less by December 31, 2007.

Status:

- Issue new Industrial NPDES Permits within statutory timeframes.

Status:

- Re-issue all identified major Industrial permits which have expired for more than ten (10) years by the end of calendar year 2007 (December 31, 2007).

Status:

☐ c) Storm Water – Ensure general storm water permits for industries, construction sites and municipalities are issued and renewed in a timely manner.
Status:

☐ d) Industrial Storm Water – Continue implementation of industrial storm water

Environmental Resource Program (ERP) initiative as resources allow.

Status:

Combined Sewer Overflow (CSO) and Sanitary Overflow (SSO), Long Term Control Plans (LTCP)

Contact(s): Paul Higginbotham & Cyndi Wagner	USEPA Contact(s): Peter Swenson & Pat Kuefler	Due Date: See below

USEPA Role: USEPA will be the lead on certain environmentally significant CSO communities, working in partnership with IDEM to reach agreement on approvable long-term control plans and implementation schedules. These include the communities of Evansville, Jeffersonville, Indianapolis, Ft. Wayne, Gary, Hammond, Mishawaka, South Bend and Elkhart, and oversight of Anderson (under the existing Federal consent decree). USEPA will continue the review of Huntington, Kokomo, Muncie, New Castle, Terre Haute, Fairmount, Hartford City and Monticello Long Term Control Plans. USEPA will provide timely review and comment on technical non-rule policy and other documents submitted by IDEM and identify issues of concern at an early stage in the review process.

☐ a) Review and approve CSO LTCPs.

- By the end of September 30, 2007, and consistent with the IDEM/USEPA CSO agreement, 65% of all permitted CSOs have one of the following: lodged Federal consent decree, an approved LTCP with an enforceable schedule, or a state judicial mechanism to develop and implement an LTCP.

Status:

- By the end of September 30, 2008, and consistent with the IDEM/USEPA CSO agreement, 75% of all permitted CSOs have approved LTCP through permitting/enforcement.

Status:

☐ b) By December 31, 2007, review and as needed, revise the existing State SSO strategy.

Status:

Integrated Compliance Information System – National Pollution Discharge Elimination System (ICIS-NPDES)

Contact(s): Debbie Dubenetzky & Jeff Ewick	USEPA Contact(s): James Coleman	Due Date: Ongoing

USEPA Role: Active involvement including conference calls, meetings, and other activities to address the problems associated with the transition from PCS to ICIS.

Complete PCS modernization.

☐ a) Work with USEPA to solve problems involving loss of data due to migration of data from PCS to ICIS.

Status:

National Pollution Discharge Elimination System (NPDES) Compliance

Contact(s): a, e, & f) Debbie Dubenetzky & Barb McDowell; b, c) Debbie Dubenetzky & Don Daily; d) Debbie Dubenetzky, Barb McDowell & Jeff Ewick	USEPA Contact(s): James Coleman, Carol Staniec & Patrick Kuefler	Due Date: a, b, c, e) Annual Basis d, f) Ongoing

USEPA Role: 1) Complete development of the Compliance Monitoring Strategy by July 1, 2007. This strategy contains goals for inspection coverage for all varieties of NPDES facilities, defines inspection types and coding, and presents expectations for state development of comprehensive monitoring strategies. 2) Review IDEM's compliance monitoring strategy in a timely fashion, so that it is available for inspection planning in FY 2008.

Maintain an adequate enforcement and compliance assistance program to help ensure that NPDES violations are prevented and if violations occur, they are adequately addressed.

☐ a) Inspections

- Prepare a draft comprehensive inspection strategy including inspections of NPDES. IDEM intends to focus traditional NPDES inspections on minor semi-public facilities. Confined Animals Feeding Operations (CAFO) inspection commitments are listed in the

OLQ section of the EnPPA.

Status:

- Respond to 100% of complaints.

Status:

☐ b) State Review Framework

- IDEM and USEPA R5 will work together to follow-up on any outstanding State Review Framework issues by December 31, 2007.

Status:

☐ c) Operator Assistance (OATS)

- Provide on-site operator assistance to communities through USEPA 104(g) grant and document pollutant discharge reductions as a result of this assistance.

Status:

☐ d) Quality Assurance/Quality Control (QA/QC)

- Conduct QA/QC reviews of submitted self-monitoring data to evaluate reliability.

Status:

- Continue to assist USEPA R5 in implementation of Federal DMR QA program.

Status:

☐ e) Operation and Maintenance (O&M) Awards

- Nominate eligible Indiana wastewater treatment facilities to USEPA R5 for consideration of a regional or national USEPA R5 O&M award (Contingent on data availability from ICIS.)

Status:

☐ f) Significant Non-Compliers (SNC)

- Maintain the SNC rate for majors below 10%, and the size of the active exceptions list below 2%, both as measured on a quarterly basis and below 17% on an annual basis.

Status:

- Monitor facilities on the Watch List and take action as appropriate.

Status:

Safe Drinking Water Act (SDWA)		
Contact(s): a) Pat Carroll & Stacey Jones; b, c, d, e) Pat Carroll & Al Lao f) Pat Carroll & Liz Melvin	USEPA Contact(s): Charlene Denys & Tom Poy	Due Date: a, b, c, d) Ongoing e) Annually f) Ongoing & End of SFY 2009
USEPA Role: a) Review and approve rules, b) Maintain and update the SDWIS database including the state version, SDWIS-state, c) provide compliance assistance, e) take necessary enforcement action to help reduce the level of non-compliance among small water systems, and f) provide support for continued development and improvement of the electronic sanitary survey form		

☐ a) Implement new Federal safe drinking water rules, including re-codifying State rules.

Status:

☐ b) Submit all required Federal reporting requirements within the required reporting period. This will be done through the Annual Resource Deployment Plan (ARDP) where items overlap.

Status:

☐ c) Maintaining Safe Drinking Water Information System (SDWIS) Database

- Maintain Public Water Supply Supervision Program by maintaining a database management system (SDWIS) that accurately tracks the inventory (including routine updates of system information), violations and enforcement, sampling information and compliance determination for all safe drinking water contaminants.

Status:

☐ d) Monitoring and Reporting Violations.

- All Public Water System's (PWS's) with violations will first receive a violation letter. For Community and Non-transient, Non-community Systems, the certified operator will also receive a violation letter. Systems that do not correct the violation after receiving the violation letter will be referred to the Office of Enforcement for appropriate actions consistent with Agency policies and procedures. In cases where the system has a certified operator, the operator will also be referred for enforcement.

Status:

☐ e) Maximum Contaminant Level (MCL) Violations

- PWSs that report information will be in compliance with 95% of pre-1994 rule and 80% of post-1994 rule requirements annually.

Status:

☐ f) Sanitary Surveys at Public Water Supply Systems

- Complete sanitary surveys at 1/3 of the regulated communities and 1/5 of the non-communities systems annually.

Status:

☐ g) At risk public water supply system

- Develop a strategy to increase technical, financial and managerial assistance to improve compliance for "at risk" SNC public water supply systems.

Status:

Source Water Protection		
Contact(s): Pat Carroll & Jim Sullivan	USEPA Contact(s): Tom Poy & Bill Spaulding	Due Date: a) Annually b) SFY 2008/SFY 2009
USEPA Role: Provide program assistance		

☐ a) Complete and distribute source water assessments (SWA) for new non-community public water systems

- Complete and distribute forty (40) SWAs in SFY 2008.

Status:

- Complete and distribute fifty (50) SWAs in SFY 2009.

Status:

☐ b) Promote the Hoosier Water Guardian Program (HWGP) to community water systems

- During SFY 2008, distribute HWG Program information to all operating CWS with goal of accepting at least twenty-five (25) applications for the program by the end of FY 2009.
- During FY 2008, review and accept ten (10) community water system applications into the HWG program during this time period.

Status:

- During FY 2009, review and accept fifteen (15) additional Community Water System (CWS) applications into the HWG Program

Status:

☐ c) Complete Phase II wellhead protection plan (Phase II WHPP) reviews of submitted community water systems.

- During FY 2008, complete five (5) Phase II WHPP reviews.

Status:

- During FY 2009, complete twenty (20) Phase II WHPP reviews.

Status:

Surface Water Quality Monitoring Strategy

Contact(s): Dennis Clark, Art Garceau, Lee Bridges & Syed Ghiasuddin	USEPA Contact(s): Linda Holst, Sarah Lehmann & Ed Hammer	Due Date: See below

USEPA Role: a) Provide assistance in revising monitoring strategy. Review and provide comments on draft and final products, b) Work with IDEM to implement the strategy and identify resources to address identified gaps, c) Work with IDEM to identify resources to address issues identified in the strategy and provide technical assistance/guidance as requested. Work with IDEM to identify portions of the strategy that could not be implemented and reasons why, d) Provide meeting support and travel support as available. Act as lead for developing agendas and provide assistance in identifying appropriate speakers for SWiMS sessions

☐ a) Implement the 2006-2010 Water Monitoring Strategy in the 2007 and 2008 monitoring seasons.

Status:

☐ b) Participate in Bio-assessment Consistency Workgroup and SWiMS meetings/activities as resources allow.

Status:

☐ c) Upload water quality data to USEPA R5's national STORET warehouse at least once a year if there are no irresolvable technical difficulties that would prevent the upload. If IDEM Information Technology/OWQ staff is having technical difficulties uploading the data, they will inform R5 Water Quality Branch Staff of those technical difficulties.

Status:

☐ d) Complete all activities funded by the FY06 Monitoring Initiative funds. Provide separate reports on these activities.

Status:

Water Quality Standards

Contact(s): a) Martha Clark Mettler b) Dennis Clark	USEPA Contact(s): Linda Holst, David Pfeifer & Candice Bauer	Due Date: Ongoing

USEPA Role: Participate in the anti-degradation workgroup, and any nutrient workgroups or meetings, as requested by IDEM. Review draft IDEM work products and provide timely comments. To the extent that resources are available, assist IDEM with travel support for Regional meetings (RTAG, WQS).

☐ a) Work with external stakeholders to complete revised anti-degradation rulemaking by June 30, 2009. Revised rule language will be second noticed by December 30, 2007.

Status:

☐ b) Implement nutrient criteria development plan, participating in Regional activities (Regional Technical Assistance Group (RTAG) meetings and conference calls), provide USEPA R5 with revisions by August 1st of each fiscal year.

Status:

☐ c) Complete adoption of revised water quality criteria for sulfate to protect aquatic life.

Status:

☐ d) Finalize and submit chloride variance rule to USEPA for review and approval under Section 303 (c) of the Clean Water Act.

Status:

☐ e) Finalize and submit revised E. coli bacteria rules.

Status:

Sustainable Infrastructure

Contact(s): Bruno Pigott & Martha Clark Mettler USEPA Contact(s): Jodi Traub Due Date: See below.

USEPA Role: Provide technical assistance, ideas and information about how other states are implementing sustainable infrastructure programs.

☐ a) IDEM will work to develop a strategy to implement a sustainable infrastructure initiative by December 31, 2008.
Status:
☐ b) IDEM will begin to implement a sustainable infrastructure initiative by December 31, 2008.
Status:

Office of Air Quality (OAQ)

$PM_{2.5}$ Emissions in Dubois County

IDEM Contact(s): Richard Zeiler USEPA Contact(s): John Mooney Due Date: Ongoing

USEPA Role: Advise, funding and review

To better understand the relationship between air quality and $PM_{2.5}$ emissions in Dubois County IDEM is conducting a comprehensive air quality assessment of Dubois County.
☐ a) Inspect local and regional regulated entities and identify local and regional sources that are known that have not been identified previously as contributing to $PM_{2.5}$ emissions.
Status:
☐ b) Investigate the use of stack testing to identify potential processes that may contribute to $PM_{2.5}$ in the county.
Status:
☐ c) Investigate the use of additional monitoring stations, air modeling and source identification to target $PM_{2.5}$ sources.
Status:
☐ d) Conduct modeling to differentiate contributing sources of $PM_{2.5}$ including transport and airsheds, mobile source emissions, regulated sources and sources typically unregulated including residential sources.
Status:

Permits Branch

Title V Operating Permits (TVOPs)

IDEM Contact(s): Nisha Sizemore USEPA Contact(s): Pamela Blakley Due Date: June 30, 2009

USEPA Role: Provide program assistance

Issue All TVOPs received prior to January 1, 2007.
☐ a) Track progress on initial TVOP applications received prior to January 1, 2001.
Status:
☐ b) Track progress on TVOP applications received prior to January 1, 2005.
Status:
☐ c) Track progress on TVOP applications received prior to January 1, 2007.
Status:
☐ d) Renew Title V operating permits -Work on pending TVOP renewals so that any timely submitted TVOP renewal applications are issued prior to expiration of current TVOP and late

applications are issued within nine (9) months of receipt.
Status:

☐ e) Provide quarterly updates to the RACT/BACT/LAER Clearinghouse.
Status:

☐ f) Provide semi-annual updates to the TOPS database.
Status:

Title V Operating Permitting (TVOP) Program

IDEM Contact(s): Nisha Sizemore USEPA Contact(s): Pamela Blakley Due Date: To be established

USEPA Role: Work with IDEM, USEPA, and OAQPS to grant TV program approval.

☐ a) Approval of Indiana's TVOP program.
Status:

Determine How to Issue Permits for CAIR and CAMR Emission Control Projects with Collateral Emission Increases

IDEM Contact(s): Commissioner Easterly USEPA Contact(s): Steve Rothblatt Due Date: To be established

USEPA Role: Obtain legal and policy determinations from USEPA senior management regarding options for permitting these projects.

☐ a) Clearly articulate the issue from IDEM's perspective by August 15, 2007.
Status:

☐ b) Share the issue articulation and any USEPA response with other States through the ECOS air committee and LADCO.
Status:

☐ c) Work with others to address any legal issues that the States and USEPA are unable to solve that will allow installation of mandated pollution control projects that at least theoretically may cause a significant emissions increase.
Status:

Minor New Source Review (NSR) Rules into the State Implementation Plan (SIP)

IDEM Contact(s): Nisha Sizemore USEPA Contact(s): Pamela Blakley Due Date: To be established

USEPA Role: Work with IDEM, USEPA and OAQPS to approve the SIP revision.

☐ a) Approval of Indiana's minor NSR rules into the SIP.
Status:

Approve New Source Review (NSR) Reform Rules into the State Implementation Plan (SIP)

IDEM Contact(s): Nisha Sizemore USEPA Contact(s): Pamela Blakley Due Date: To be established

USEPA Role: Work with IDEM, USEPA, and OAQPS to approve the SIP revision

☐ a) Approve Indiana's version of the December 31, 2001 New Source Review Reform Rules into the SIP.
Status:

Air Compliance Branch and Office of Enforcement Air Section

Compliance Monitoring Strategy (CMS) for Title V and Federally Enforceable State Operating Permit (FESOP)		
Contact(s): Phil Perry & Craig Henry	USEPA Contact(s): Brent Marable	Due Date: June 30, 2009
USEPA Role: Review CMS and work closely with IDEM/OAQ staff to insure any issues are satisfactorily addressed.		

Develop and implement the CMS for Title V and FESOP source inspections and compliance evaluations.

☐ a) Develop the Compliance Monitoring Strategy (CMS) with USEPA R5 by August 31, 2007 and August 31, 2008.

Status:

☐ b) Implement the CMS for inspections and compliance evaluations.

- Conduct full compliance evaluations of 70% of Part 70 sources once every two (2) years.
- Conduct full compliance evaluation of the remaining 30% of the Part 70 sources once every three (3) years except for Part 70 gas compressor station and gas turbine sources. A full compliance evaluation of all Part 70 gas compressor stations and gas turbine sources will be conducted once every five (5) years. Mega-sites will be identified in the CMS and a full compliance evaluation of those sites will be conducted once every three (3) years.
  - * Note - Those sources that will be part of the remaining 30% of the Part 70 sources that will have full compliance evaluations once every three (3) years and include EPA's National Performance Track member and Indiana Environmental Stewardship Program members. The remaining Part 70 sources will be prioritized for full compliance evaluations with those that maintain in compliance status prioritized as part of the 30%. In those years where full compliance evaluations are not conducted, partial compliance evaluations will be completed including review of annual compliance certifications, review of quarterly deviation reports, review of emergency reports and review of the various emissions reports.
- Conduct full compliance evaluations of all FESOP sources once every five (5) years except, as noted in the CMS.
- Track and review Title V and FESOP annual compliance certifications.

Status:

☐ c) Upload compliance and enforcement information from Air Compliance Enforcement System (ACES) to meet USEPA's Minimum Data Requirements (MDR) within the sixty (60) day standard required for reporting by the 2005 AFS Information Collection Request (ICR). Ensure the information provided is complete, accurate and timely consistent with USEPA policies and the ICR.

Status:

☐ d) Develop a High Priority Violator (HPV) checklist to be used in conjunction with all violations identified at "major" stationary sources (as defined by the Clean Air Act Amendment of 1990 (CAA)). Provide the HPV checklist and provide training on the identification of HPVs to all inspectors, stack test reviewers, enforcement staff and local agencies.

Status:

☐ e) Develop a referral process by which Construction and Operation Without a Permit (CWOP/OWOP) violations identified in permit applications or through the permit review process will be referred to the Air Compliance Branch.

Status:

☐ f) Respond to complaints including those referred from USEPA. Inspections are conducted where necessary.

Status:

☐ g) IDEM will provide training to all case managers on the use of injunctive relief.

Status:

☐ h) Prepare enforcement cases according to IDEM guidance and HPV criteria. Participate in enforcement conferences and follow up on the requirements of Agreed Orders.

Status:

☐ i) IDEM will review findings and prepare enforcement cases according to the HPV Policy and the Civil Penalty Policy for noncompliance with statutes, rules or permits.

Status:

☐ j) Develop legal mechanism to issue permits for emission control projects that are required to meet the Clean Air Interstate Rule (CAIR) and the Clean Air Mercury Rule (CAMR) requirements that may cause collateral emission increases.

Status:

Compliance Monitoring Strategy (CMS) for Asbestos

Contact(s): Phil Perry & Dan Stamatkin	USEPA Contact(s): Brent Marable	Due Date: June 30, 2009

USEPA Role: Review IDEM asbestos periodic and end-of-year reports and work closely with OAQ staff to insure any issues are raised and satisfactorily addressed.

☐ a) Develop an annual CMS for inspections and compliance evaluation of asbestos notifications, licensed asbestos contractors and stationary asbestos sources. The CMS will target and prioritize asbestos inspections, utilize resources effectively and make necessary policy adjustments as needed. Priorities include complaints, new contractors, contractors previously issued warning and violation letters/Notice of Violations (NOVs), and schools.

Status:

☐ b) Implement an annual CMS for inspections of licensed asbestos contractors.

Status:

☐ c) Respond to asbestos complaints including those referred from USEPA.

Status:

☐ d) Provide quarterly reports to USEPA of the asbestos activities.

Status:

Air Monitoring Branch

Conduct Ambient Air Quality Monitoring Throughout Indiana

IDEM Contact(s): Richard Zeiler & Steve Lengerich	USEPA Contact(s): Loretta Lehrman & Michael Compher	Due Date: Ongoing

USEPA Role: Regulatory advice, funding and review

☐ a) Operate monitors for National Ambient Air Quality Standards (NAAQS) pollutants, $PM_{2.5}$ speciation and PAMS according to 40 CFR 58, approved monitoring plans, and QMP/QAPPS.

Status:

☐ b) Submit annual network plan required by 40 CFR 58.10 by July 1 of the prior year, unless another schedule has been approved by Region 5.

Status:

☐ c) Coordinate monitoring and QA activities with local agencies.

Status:

☐ d) Improve certification lab operation by the continued use of the most current lab standards, and continued use of state-of-the-art techniques to produce the most accurate certifications possible.

Status:

☐ e) Investigate new analytical methods of testing through new equipment.

Status:

☐ f) Ensure adequate, independent QA audits of NAAQS monitors.

Status:

☐ g) Conduct Pilot for precursor gases monitoring for $PM_{2.5}$ and submit data to the Air Quality System (AQS).

Status:

☐ h) Conduct Aethalometer monitoring.

Status:

☐ i) Operate, evaluate and improve monitoring procedures and data reporting of the Photo-chemical Analytical Monitoring Stations (PAMS) monitoring in Northwest Indiana.

Status:

☐ j) Assist in the changeover to IMPROVE—style carbon samplers at $PM_{2.5}$ speciation trends and supplemental sites.

Status:

Monitor for Air Toxics

IDEM Contact(s): Steve Lengerich & Balvant Patel	USEPA Contact(s): Loretta Lehrman & Motria Caudill	Due Date: Ongoing
USEPA Role: Risk assessment and data analysis advice, special grant funding, and review		

Conduct effective non-criteria pollutant monitoring

☐ a) Maintain Indiana Air Toxic Monitoring Program.

Status:

☐ b) Monitor air toxics at School #21 in Indianapolis.

Status:

☐ c) Conduct toxics monitoring at Whiting High School in Whiting.

Status:

☐ d) Conduct air toxics monitoring and community assessments efforts in Southwest Indianapolis.

Status:

☐ e) Conduct RadNet monitoring in Indianapolis. One site is currently operated by Indianapolis Office of Environmental Services and will continue through June 30, 2009.

Status:

Make Air Monitoring Information Publicly Available

IDEM Contact(s): Steve Lengerich	USEPA Contact(s): Loretta Lehrman & Pat Schraufnagel	Due Date: Ongoing
USEPA Role: Advise, funding and review		

Assess and modify Indiana's air monitoring program and make monitoring information available to the public.

☐ a) Perform a QA network evaluation.

Status:

☐ b) Work with Lake Michigan Air Directors Consortium (LADCO) and USEPA R5 to implement a Regional Monitoring Strategy. Implement monitoring revisions identified for action through October 2007.

Status:

☐ c) Begin the first 5-year cycle network assessment required by July 1, 2010.

Status:

☐ d) Conduct data analysis to determine improvement, degradation, etc. of air quality.

Status:

☐ e) Perform annual industry and local agency evaluations (systems audit).

Status:

☐ f) Review and update OAQ Quality Assurance Manual.

Status:

☐ g) Submit National Ambient Air Quality Standards (NAAQS) pollutant data, PAMS and QA data to AQS according to schedule in 40 CFR 58.

Status:

☐ h) Produce daily and hourly ozone and $PM_{2.5}$ data and maps to be posted on the internet as per USEPA Ozone and $PM_{2.5}$ Mapping Projects.

Status:

☐ i) Maintain Air Quality Index (AQI) reporting in designated cities.

Status:

☐ j) Certify NAAQS pollutant data in AQS and provide supporting documentation by the schedule in 40 CFR 58.

Status:

☐ k) Ozone, $PM_{2.5}$ and Meteorological data should be submitted to AIRNOW.

Status:

LEADS ® (Leading Environmental Analysis and Display System)		
IDEM Contact(s): Steve Lengerich	USEPA Contact(s): Loretta Lehrman & Michael Compher	Due Date: Ongoing
USEPA Role: Advise, funding and review		

Collect real-time air quality information using LEADS ®.

☐ a) Reconfigure continuous monitoring sites to install automatic calibration equipment (completion date by June 30, 2008).

Status:

☐ b) Deploy LEADS® at all continuous monitoring site locations (completion date June 30, 2008).

Status:

☐ c) Provide current data from all active continuous monitoring sites to the public via the Agency web (completion date by June 30, 2008).

Status:

☐ d) Provide past data from active continuous monitoring sites and past data from recently discontinued sites (completion date by December 31, 2008).

Status:

☐ e) Develop any newly identified data reports for public and Agency use (June 30, 2009).

Status:

Air Programs Branch

8-hour ozone State Implementation Plans (SIPs)

IDEM Contact(s): Scott Deloney & Pat Daniel USEPA Contact(s): John Mooney Due Date: One (1) year after submittal

USEPA Role: Timely guidance, review and approval

☐ a) Work with USEPA to obtain approval of attainment demonstration for Lawrenceburg Township in Dearborn County (submitted June 15, 2007).

Status:

☐ b) Work with USEPA to obtain approval of re-designation SIPs.

- Lake/Porter County (July 2007);
- LaPorte County (June 2007);
- St. Joseph/Elkhart County (June 2007);
- Central Indiana (August 2007).

Status:

$PM_{2.5}$ State Implementation Plans (SIPs)

IDEM Contact(s): Scott Deloney & Pat Daniel USEPA Contact(s): John Mooney Due Date: April 5, 2008

USEPA Role: Timely guidance, review and approval

☐ a) Prepare and submit attainment demonstrations for $PM_{2.5}$ as applicable.

Status:

- Public comment period to commence by February 2008.

Status:

- Final Submittal to be made by April 5, 2008.

Status:

Ozone and $PM_{2.5}$ Re-designation Petition and Maintenance Plans

IDEM Contact(s): Scott Deloney USEPA Contact(s): John Mooney Due Date: Ongoing

USEPA: Timely guidance, review and approval

Perform and submit re-designation petitions and maintenance plans as applicable:

☐ a) Public comment period to commence within eight (8) months of QA/QC of monitoring data.

Status:

☐ b) Final submittal to USEPA to be made within ten (10) months of QA/QC of monitoring data.

Status:

Preliminary Designation Recommendation State Implementation Plans (SIPs)

IDEM Contact(s): Scott Deloney USEPA Contact(s): John Mooney Due Date: See below

USEPA Role: Timely guidance, review and approval

Conduct analysis, develop and submit designation recommendations to USEPA concerning daily $PM_{2.5}$ standard.

☐ a) Initial analysis complete by November 2007.

Status:

☐ b) Initial recommendations submitted by December 2007.
Status:

Regional Haze State Implementation Plans (SIP)		
IDEM Contact(s): Ken Ritter & Chris Pederson	USEPA Contact(s): John Mooney & Pamela Blakely	Due Date: One (1) year after IDEM completes submittal to USEPA
USEPA Role: Timely guidance		

☐ a) Consult with States containing Class I areas upon which Indiana sources have a visible impact.
Status:
☐ b) Work with Midwest Regional Planning Organization (MRPO) to develop TSD to support Indiana SIP.
☐ c) Adopt Best Available Retrofit Technology (BART) into state rules
- First Notice July 2006;
- Second Notice March 2007;
- Third Comment Period July 2007;
- Final Adoption October 2007.

Status:
☐ d) Submit Regional Haze SIP, including complete BART rule, by December 2007.
Status:

Obtain USEPA Approval of Outstanding Rules and SIPs		
IDEM Contact(s): Pat Troth	USEPA Contact(s): John Mooney & Pamela Blakely	Due Date: 1 year after IDEM complete submittal to USEPA
USEPA role: Timely guidance, review and approval		

Work with USEPA to gain approval of the following pending rules or plan submittals and future rules and plan submittals:
☐ a) Title V Program (March 2002)
Status:
☐ b) NOx SIP Call, Phase II (March 2006)
Status: Anticipate approval in September 2007
☐ c) Holy Cross (November 2005)
Status: Anticipate approval in September 2007
☐ d) Vertellus (April 2005, address this in update to 326 IAC 6.5)
Status: IDEM is considering withdrawal
☐ e) NSR Reform (September 2004)
Status:
☐ f) Crane (January 2003)
Status: IDEM is considering withdrawal
☐ g) Lead Smelters (February 2002)
Status: Anticipate approval in September 2007
☐ h) Minor NSR (February 1999)
Status:
☐ i) Clean Air Mercury Rule (CAMR)
- Adopt CAMR into state rule (October 2007);
- USEPA approval of CAMR.

Status:

☐ j) Approve Regional Haze SIP and BART rule (to be submitted December 2007)

Status:

☐ k) Adopt BART rule into state rule

- First Notice July 2006;
- Second Notice March 2007;
- Third Comment Period July 2007;
- Final Adoption October 2007.

Status:

☐ l) Update of 326 IAC 6.5 and 326 IAC 6.8

- First notice November 2004;
- Second Notice October 2005;
- Preliminary Adoption August 2007;
- Third Comment Period September 2007;
- Final Adoption November 2007.

Status:

☐ m) Compliance Monitoring Rule

- First Notice December 2005
- Second Notice July 2007
- Preliminary Adoption October 2007
- Third Comment Period November 2007
- Final Adoption January 2008

Status:

☐ n) Volatile Organic Compounds (VOC) Rules

1) Auto Refinishing

- First Notice January 2007;
- Second Notice August 2007;
- Preliminary Adoption October 2007;
- Third Comment Period November 2007;
- Final Adoption January 2008.

Status:

2) Architectural and Industrial Maintenance Coatings

- First Notice January 2007;
- Second Notice August 2007;
- Preliminary Adoption October 2007;
- Third Comment Period November 2007;
- Final Adoption January 2008.

Status:

3) Consumer Products

- First Notice June 2007;
- Second Notice August 2007;
- Preliminary Adoption October 2007;
- Third Comment Period November 2007;
- Final Adoption January 2008.

Status:

4) Organic Solvent Degreasing Operations

- First Notice June 2007;
- Second Notice August 2007;
- Preliminary Adoption October 2007;
- Third Comment Period November 2007;
- Final Adoption January 2008.

Status:

5) Stage I Vapor Recovery

- First Notice June 2007;
- Second Notice August 2007;
- Preliminary Adoption October 2007;
- Third Comment November 2007;
- Final Adoption January 2008.

Status:

☐ o) Permitting Rules

Article 2 Revisions for USEPA required changes and consistency with federal rules

Status:

☐ p) Hydronic Heaters/Outdoor Boiler Rule

- First Notice December 2005;
- Second Notice July 2007.

Status:

Southwest Indianapolis Air Toxics Study		
IDEM Contact(s): Brian Wolff	USEPA Contact(s): Motria Caudill & George Bollweg	Due Date: See below
USEPA Role: Technical support and funding, if available		

☐ a) Ensure ongoing Community Involvement;

- Participate in neighborhood association meetings;
- Participate in industry sponsored community meetings;
- Maintain a project specific website;
- Develop and circulate a project brochure (English and Spanish);
- Sponsor community meetings to communicate results of study.

Status:

☐ b) Conduct HAPs, metals and chromium monitoring from October 2006 through September 2008. Data will be analyzed monthly and posted within three (3) months of collection.

Status:

☐ c) Technical Advisory Group to convene regular meetings throughout study. First meeting held in August 2006.

Status:

☐ d) Request for emissions data from source July 2007

Status:

☐ e) HAPs Modeling December 2007

Status:

☐ f) Model to monitoring comparison March 2008

Status:

☐ g) Risk Characterization complete June 2008

Status:

☐ h) Communication of results to stakeholders, in 2008
Status:
☐ i) Interim report issued October 2008
Status:
☐ j) Final report issued October 2008
Status:

Office of Land Quality (OLQ)

Resource Conservation Recovery Act (RCRA) Corrective Action		
IDEM Contact(s): Vic Windle & Mike Sickels	USEPA Contact(s): Hak Cho	Due Date: June 30, 2008 & June 30, 2009
USEPA Role: Contractor support for sampling and risk review at selected sites.		

Meet the requirements of the Resource Conservation and Recovery Act (RCRA) Government Performance and Results Act (GPRA).
☐ a) IDEM will work with USEPA to finalize the assignment for leads for obtaining the 2008 GPRA Environmental Indicators and establish reasonable deadlines for specific facilities. IDEM will issue permits and orders that will help achieve USEPA's 2008 GPRA goals.
Status:
☐ b) Hazardous Waste (HW) Permit staff will complete the following Environmental Indicators (EI): CA 725 for 95% of the 2008 GPRA baseline facilities and CA 750 for 80% of the 2008 GPRA baseline facilities by September 30, 2008, and CA 725 for 98% of the 2008 GPRA baseline facilities and CA 750 for 85% of the 2008 GPRA baseline facilities by September 30, 2009.
Status:
☐ c) IDEM will assume the corrective action lead on an additional six (6) USEPA lead transfers of 2008 GPRA baseline facilities by September 30, 2008, and an additional six (6) transfers by September 30, 2009.
Status:
☐ d) IDEM will issue permits and orders in an effort to achieve USEPA's 2008 GPRA corrective action goals for the following environmental indicators: CA 400 for 30% of the baseline facilities, and completing CA 550 for 20% of the baseline facilities by September 30, 2008, and CA 400 for 35% of the 2008 GPRA baseline facilities and CA 550 for 25% of the 2008 GPRA baseline facilities by September 30, 2009.
Status:
☐ e) IDEM will work with USEPA to finalize the 2020 GPRA baseline facilities list, establish goals for the 2020 GPRA baseline facilities list for CA 725, CA 750, CA 400 and CA 550 and establish specific goals for the land revitalization initiative.
Status:
☐ f) Create a strategy to review and inspect RCRA non-notifiers.
Status:

Hazardous Waste Permitting and Post-Closure

IDEM Contact(s): Vic Windle	USEPA Contact(s): Dale Meyer	Due Date: June 30, 2008 & June 30, 2009

USEPA Role: Provide program assistance

Complete hazardous waste facility permitting actions in accordance with USEPA GPRA goals. Priority will be given to permit application submittals that are subject to Indiana's permit accountability statute.

☐ a) Issue permit renewals to 100% of the baseline facilities by September 30, 2008.

Status:

☐ b) Bring 95% of the non- bankrupt baseline facilities "under control" (permit or order) by September 30, 2008.

Status:

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Generators

IDEM Contact(s): John Crawford	USEPA Contact(s): Lorna Jereza	Due Date: June 30, 2008 & June 30, 2009

USEPA Role: Conduct inspections at, at least six large quantity generators (LQGs).

Annually, IDEM will inspect generators identified in the RCRAInfo database.

☐ a) At least 15% of the large quantity generator (LQG) universe that exists as of June 1 of that respective year will be inspected to determine the percentage in compliance.

Status:

☐ b) A number of inspections equivalent to 5% of the LQG's (approximately twenty-seven (27) inspections, based on an LQG universe of approximately 525) will be conducted through a non-notifier initiative. IDEM has identified a large number of manufacturing facilities (over 500) that have not notified as RCRA generators. To assure that this non-notifier universe is properly managing manufacturing waste, IDEM will implement an initiative based on the Environmental Results Program (ERP) approach. The non-notifier universe will be provided with regulatory fact sheets, guidance documents, self-certification checklists, and other compliance assistance resources, with an emphasis on proper waste determinations and generator status confirmation. Facilities will be encouraged to self-certify their compliance status, or self-disclose any existing violations. A minimum of twenty-seven (27) facilities will be inspected by IDEM as a quality assurance measure. As a result of the initiative, IDEM will obtain a better understanding of the compliance status of non-notifiers, and the facilities will have opportunities to assure ongoing compliance with applicable regulations. In some cases, specific violations or practices may be identified and corrected, and the status of some facilities may change. IDEM will track responses, the method used to determine their compliance status, changes in generator status, specific violations or practices which are identified and corrected, and a variety of other data.

Status:

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Treatment, Storage and Disposal facilities (TSDs)

IDEM Contact(s): Rosemary Cantwell | USEPA Contact(s): Lorna Jereza | Due Date: June 30, 2008 & June 30, 2009

USEPA Role: USEPA R5 will independently inspect the boiler and industrial furnace units at five (5) TSDs, and inspect two additional operating TSDs for all permit requirements. EPA will perform annual inspections at all operating TSDs owned or operated by State and Local Governments.

☐ a) Each fiscal year, IDEM will inspect 50% of all TSDs with a current operating permit for active permitted units.

Status:

☐ b) IDEM will perform inspections annually at operating TSDs owned or operated by the Federal Government.

Status:

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Enforcement

IDEM Contact(s): Nancy Johnston | USEPA Contact(s): Lorna M. Jereza | Due Date: June 30, 2008 & June 30, 2009

USEPA Role: Issue enforcement responses to RCRA violations detected by USEPA, or referred to USEPA by IDEM, in accordance with USEPA's 2003 Hazardous Waste Civil Enforcement Response Policy, USEPA's RCRA Civil Penalty Policy and relevant USEPA enforcement strategies.

☐ a) Issue enforcement responses to RCRA violations in accordance with IDEM's enforcement response strategy and USEPA's 2003 Hazardous Waste Civil Enforcement Response Policy.

Status:

Underground Storage Tank (UST) Inspections

IDEM Contact(s): Skip Powers & Craig Schroer | USEPA Contact(s): Dale Meyer | Due date: April 30, 2008 & April 30, 2009; June 30, 2008 & June 30, 2009

USEPA R5 will work cooperatively with IDEM on the primary provisions of the Underground Storage Tank (USTs) Provisions of the Energy Policy Act of 2005, such as the three (3) year inspection cycle. It is the USEPA R5's current understanding that IDEM will work toward meeting the provisions of the Act, but request that IDEM advise the USEPA R5 if the situation changes. Additional underground storage tank provisions of the Energy Policy Act may be found at the website maintained by USEPA's Office of Underground Storage Tanks at http://www.eps.gov/oust/fedlaws/epact _05.htm . IDEM is encouraged to visit this website where final guidance for delivery prohibition and secondary containment are posted and draft guidance for several other provisions are available.

☐ a) Work to ensure all new and unregistered tanks are properly registered.

Status:

☐ b) The state's goal is to increase compliance by at least one percent (1%) each year as measured by Significant Operating Compliance (SOC).

Status:

☐ c) In FY 2006, the state had two-hundred-eighteen (218) new releases; IDEM's objective is to continue reducing that number.

Status:

☐ d) Conduct 1390 UST inspections of federally regulated facilities each fiscal year for a total of 2780 to determine the percentage in compliance. Facilities with UST violations will receive appropriate enforcement responses consistent with State enforcement policies.

Status:

☐ e) Complete and submit to USEPA R5 the UST Semi-annual Performance Measures Report (STARS). The report will be submitted in October and April each fiscal year. The State UST database will be maintained and kept up-to-date with new tank notifications, closures and change-in-service notifications.

Status:

☐ f) IDEM will inform USEPA R5 quarterly of the State status of the implementation of the Energy Policy Act of 2005.

Status:

Polychlorinated Biphenyl (PCB) Inspections

IDEM Contact(s): John Crawford	USEPA Contact(s): Kendall Moore	Due Date: June 30, 2008 & June 30, 2009

USEPA Role: Review IDEM's PCB inspection reports and, if necessary, issue the appropriate enforcement response.

☐ a) Basic PCB screenings will be incorporated into generator and complaint inspections where appropriate.

Status:

☐ b) Conduct twenty-four (24) PCB inspections for FY 2008 and twenty-four (24) PCB inspections for FY 2009.

Status:

☐ c) Participate in USEPA's current tablet computer and electronic inspection pilot program.

Status:

☐ d) Continue to oversee PCB cleanups and provide technical assistance to the regulated community.

Status:

Resource Conservation Recovery Act (RCRA) RCRAInfo

IDEM Contact(s): Greg Overtoom	USEPA Contact(s): Jane Ratcliffe	Due Date: Monthly

USEPA Role: Provide program assistance

Resource Conservation and Recovery Act (RCRA) information will be input into the RCRAInfo database on a monthly basis.

☐ a) IDEM will begin integrating the Indiana RCRA Activities Tracking System (IRATS) into the Agency's Environmental Information System (EIS), IDEM's new Agency-wide database. IRATS integration is dependent upon other Agency EIS related priorities, but IRATS is tentatively scheduled for integration into the EIS in 2009. Once fully integrated the EIS will be used to track all RCRA related regulatory activities and IRATS will be decommissioned. The handler data flow from IRATS to RCRAInfo via IDEM's National Environmental Information Exchange Network (NEIEN) node developed in 2005-2007 will be modified to use the EIS data rather than IRATS.

Status:

☐ b) IDEM will develop field-based electronic forms for collecting RCRA compliance inspection information and synchronizing that information to IRATS and EIS once the integration is complete.

Status:

Rule Development

IDEM Contact(s): Mike Dalton	USEPA Contact(s): Rich Traub	Due Date: FY 2008 - 2009

USEPA Role: Many rule updates are promulgated by USEPA and IDEM mutually agreed upon time frames. Regarding the Research, Development, and Demonstration rule (RDD), USEPA will provide assistance where applicable.

Develop equivalent legislation, regulations and program revision applications for RCRA and

Hazardous and Solid Waste amendments (HSWA) / non-HSWA provisions for which the state is prepared to seek authorization and submit current and future authorization packages within a mutually agreed upon time frame.

☐ a) IDEM will promulgate and pursue authorization for all RCRA Subtitle C annually and Subtitle I rules as needed.

Status:

Confined Animal Feeding Operations (CAFO) Inspections		
IDEM Contact(s): Charles Grady	USEPA Contact(s): Steve Jann & Pat Kuefler	Due Date: June 30, 2008 & June 30, 2009
USEPA Role: Provide training on conducting CAFO inspections to IDEM staff, as requested. USEPA R5 will be lead on enforcement where there is non-compliance with existing Federal orders or where non-compliance is documented through a Federal lead inspection.		

☐ a) Conduct compliance inspections at 20% of all CAFOs each fiscal year.

Status:

☐ b) Issue NPDES Permits to all CAFOs.

Status:

Office of Pollution Prevention & Technical Assistance (OPPTA)

Collaborative Supplemental Environmental Projects (SEPs)		
Contact(s): Dan Murray & Kyle Endris	USEPA Contact(s): Andy Anderson	Due Date: See below
USEPA Role: Provide resource flexibility to accomplish this goal and lend support and collaborative resources to develop and implement initiatives to each agency's expectations.		

☐ a) Develop a state regional collaborative process to work with interested Indiana citizens and entities to identify, assess and develop feasible environmentally beneficial projects for inclusion in IDEM's Supplemental Environmental Project (SEP) library. Expectations are that the IDEM SEP library will contain Indiana regionally chosen projects for use in IDEM enforcement proceedings by July 2009.

Status:

Financial Mechanisms to Promote Implementation of Environmentally Beneficial Projects		
Contact(s): Dan Murray	USEPA Contact(s): Marilou Martin	Due Date: See below
USEPA Role: Provide resource flexibility to accomplish this goal and lend support and collaborative resources to develop and implement initiative to each agency's expectations.		

☐ a) Develop state sponsored financial assistance program for Indiana regulated entities. Develop an external workgroup to research and analyze existing financial mechanisms and strategies used by governmental and private entities to fund voluntary environmental projects. The workgroup would develop ideal environmental financial assistance program for consideration by Indiana's Executive and Legislative Branches of government, if necessary. Expectations are that the program will be proposed for consideration by July 2009.

Status:

Comprehensive Local Environmental Action Network (CLEAN) Program		
Contact(s): Dan Murray & Stacey Martindale	USEPA Contact(s): Karen Vasquez	Due Date: See below
USEPA Role: Provide continued support and resources per MOU.		

☐ a) Focus program resources on marketing CLEAN and working with communities to assist them in becoming eligible for the program. A Memorandum or Understanding (MOU) is in place for USEPA R5 to partner with IDEM to promote CLEAN and work with interested communities. Per the MOU, USEPA R5 and IDEM will continue to solicit communities, market the CLEAN program and assist interested communities to develop their Quality of Life Plan and application to join CLEAN.

Status:

Measurement of Solid Waste Diversion and Recycling		
Contact(s): Bruce Palin, Dan Murray & Monica Hartke-Tarr	USEPA Contact(s): Margaret Guerriero	Due Date: See below
USEPA Role: Provide resources to accomplish this goal and lend support to develop and implement revised measurement of state's solid waste diversion and recycling efforts and programs.		

☐ a) Research existing approach, data, systems and activities relative to solid waste disposal, reduction, reuse and recycling in an effort to measure and report results of these activities. Develop state solid waste diversion and recycling measurement approach to enable IDEM to accurately report the amount of solid waste that is diverted from disposal or recycled. Expectations are that the revised measurement and reporting process will be developed by July 2008 and measurement numbers using this new approach will be reported by July 2009.

Status:

Homeland Security

Homeland Security		
Contact(s): Max Michael & Laura Steadham	USEPA Contact(s): Roger Kanera	Due Date: To be established
USEPA Role: Guidance and federal coordination.		

Assist in the coordination for preventing, protecting against, responding to and recovering from man-made or natural threats and events to people, property and the economy.

☐ a) Provide Agency representation for the Indiana Counter Terrorism and Security Council (CTASC) as required by IC 10-19-8.

Status:

☐ b) Support the coordination of counter terrorism activities performed by the CTASC for terrorist activities targeted at drinking water utilities and assist to improve the state's ability to respond to a terrorism incident at a drinking water facility.

Status:

☐ c) Provide Agency representation for the Indiana Emergency Response Commission (IERC). The IERC is required by the Superfund Amendment and Reauthorization Act (SARA) Title III and the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 to maintain Title III records in Indiana with the local emergency planning committees.

Status:

☐ d) Annually review and provide comments on the Indiana Strategy for Homeland Security.

Status:

☐ e) Participate in Homeland Security tabletop exercises.

Status:

☐ f) Develop an incident debris plan. In the event of a significant natural or man-made disaster, work with appropriate agencies to ensure the proper management and disposition of incident debris (including biological or infectious debris, and decontamination related waste) in a manner

that is protective of human health and the environment.

Status:

Indiana Water/Wastewater Agency Response Network (INWARN)		
Contact(s): Bruno Pigott	USEPA Contact(s): Ralph Dollhopf	Due Date: To be established
USEPA Role: Guidance and federal coordination.		

The Indiana Water/Wastewater Agency Response Network (INWARN) is a formalized system of members of the water/wastewater regulated community that have come together to address mutual aid during man-made and natural disasters.

☐ a) Support and assist drinking water and wastewater utilities, in developing and establishing INWARN to facilitate utilities accessibility to aid during natural and man-made disasters.

Status:

☐ b) Support INWARN efforts, as requested, to market the INWARN mutual aid system to Indiana drinking water and wastewater utilities in order to maximize participation in and effectiveness of INWARN.

Status:

BioWatch		
Contact(s):Dick Zeiler & Steve Lengerich	USEPA Contact(s): Ralph Dollhopf	Due Date: To be established
USEPA Role: Guidance and federal coordination.		

☐ a) Conduct BioWatch monitoring in Indianapolis at eight (8) locations.

Status: