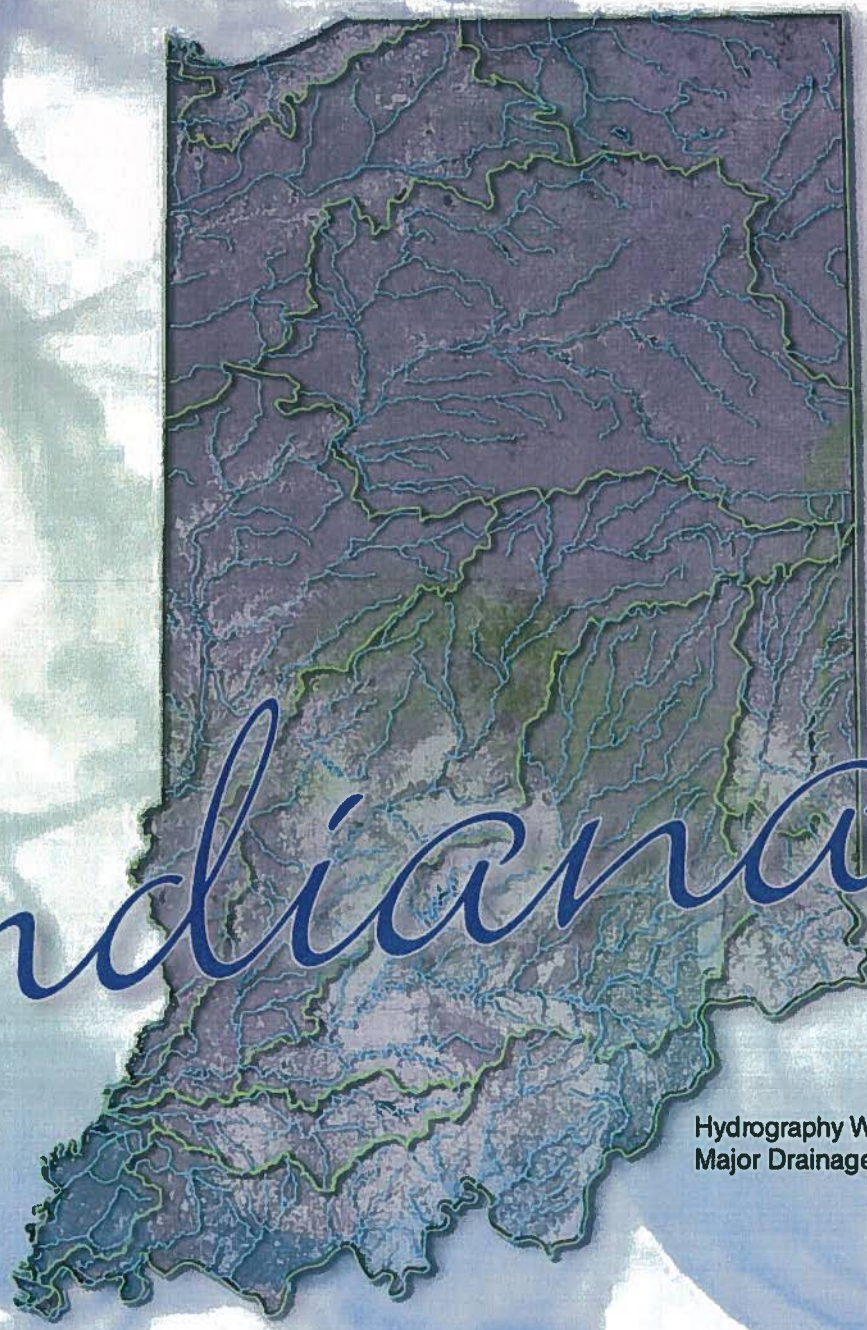
2011-2013

EnPPA

Indiana



Hydrography Watersheds and Major Drainage Ways

Environmental Performance Partnership Agreement

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 2011-2013 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 27, 2011
Date

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

Susan Hedman, Regional Administrator
U.S. Environmental Protection Agency, Region 5

6-30-11
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, 2011 – June 30, 2013

Purpose of the EnPPA

The Indiana Department of Environmental Management (IDEM) and the United States Environmental Protection Agency, Region 5 (U.S. EPA R5) have entered into their eighth Environmental Performance Partnership Agreement (EnPPA). This biennial agreement identifies program specific priorities and program specific joint priorities between the two 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, 2011 to June 30, 2013.

The EnPPA is a product of the National Environmental Performance Partnership System (NEPPS), a joint initiative of the U.S. EPA and Environmental Council of States (ECOS). The EnPPA, formed under NEPPS, is designed to provide states and U.S. EPA 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 does not encompass the entire work load of each agency, but is intended to compliment IDEM's strategies and U.S. EPA'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.

Grants Covered Under the EnPPA

IDEM 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. All personnel cost for the 2011-2013 Performance Partnership Grant (PPG) will be provided in detail by individual program function in the budget narrative portion of the 2011-2013 PPG grant application. 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. Air Section 105-activities under CFDA 66.001;
4. Resource Conservation Recovery Act (RCRA)-activities under CFDA 66.801 and 66.808;

5. Polychlorinated Biphenyl(s) (PCB)-activities under CFDA 66.701;
6. 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. Underground Storage Tank (UST)--activities under CFDA 66.805 and 66.816;
3. Outreach Operator Training 104(g)(1)--activities under CFDA 66.467;
4. Counter Terrorism Safe Drinking Water Act (SDWA) 1442--activities under CFDA 66.474;
5. Clean School Bus USA--activities under CFDA 66.036;
6. Biowatch-activities under Department of Homeland Security CFDA 97.091;
7. Diesel Emissions Reduction Act, CFDA 66.040;
8. Air $PM_{2.5}$ Section 103--activities under CFDA 66.034.

Fiscal Responsibility

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 grants 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 U.S. EPA grants.
3. **Draft EnPPA**: The draft EnPPA was developed from the priority list and presented to U.S. EPA R5 during a kick-off meeting held in Merrillville on May 6, 2011.
4. **Program Work Group Discussion**: Program groups from both agencies met jointly to discuss work plans, goals and EnPPA priorities. (The joint group meeting for Air Quality was held on May 18, 2011, program to program discussions were held for Land and Water.)
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 U.S. EPA 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 U.S. EPA 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 U.S. EPA needs.

Roles of IDEM and U.S. EPA

This agreement defines the roles that both IDEM and U.S. EPA R5 will undertake to meet the program commitments. IDEM and U.S. EPA 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. U.S. EPA R5'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 U.S. EPA R5, such as permitting, compliance, enforcement, monitoring, and outreach.

Enforcement and Compliance 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-U.S. EPA 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, U.S. EPA has a continuing role in environmental protection in the State of Indiana. U.S. EPA 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 U.S. EPA 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 IDEM Quality Assurance Annual Reports were sent to U.S. EPA R5 on the following dates:

- 2007-2008 Quality Assurance Annual Report sent June 11, 2008;
- 2008-2009 Quality Assurance Annual Report sent June 8, 2009;
- 2009-2010 Quality Assurance Annual Report sent on June 18, 2010.

A revised QMP will be submitted for U.S. EPA approval during the 2011-2013 EnPPA reporting period.

Reporting

IDEM will continue to report to U.S. EPA 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 website and other existing reports as supporting documentation for the EnPPA and the PPG. Both IDEM and U.S. EPA will report through the Joint Assessment Process.

Reporting through the Joint Environmental Conditions and the Final Conditions Report the following status tools for each performance measure are used:

1. Complete. The performance measure elements have been completed.
2. In progress. The performance measure is progressing towards a specific goal or objective.
3. Ongoing. The performance measure is progressing and will be a continuing measure in the next EnPPA cycle.
4. Incomplete. The performance measure has not been adequately addressed.
5. Project withdrawn. The performance measure has been withdrawn due to the stated reasons or fiscal constraints.

If IDEM is presented with a funding shortfall for any performance measure funded by federal dollars agreed upon in the Performance Partnership Agreement (PPA), or negotiated in the EnPPA, both parties reserve the right to renegotiate and discuss removal of performance measures from the EnPPA.

IDEM has listed the link to the U.S. EPA Strategic Goals for 2011-2015 for each performance measure along with the funding source. The funding sources indicate the following:

1. PPG. Funds come from the Performance Partnership Grant (PPG), including the State and federal match portions.
2. State. Funds come from the State of Indiana and no federal funds are received to support this measure.

3. Federal. Funds come from a federal grant other than the PPG, and when possible the specific grant is listed.

Joint Priorities and Action Items

Joint priorities represent a subset of environmental program responsibilities that IDEM and U.S. EPA R5 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 U.S. EPA R5 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 U.S. EPA R5 have identified the following Joint Priorities:

Air Quality Program Joint Priorities

IDEM will perform a detailed evaluation of the "high risk facilities" identified by the 2005 National Air Toxics Assessment (NATA). The evaluation of facilities will be prioritized based on level of potential risk and environmental justice-related statistics.

Land Quality Joint Priorities

Indiana Harbor, Shipping Canal and Grand Calumet River--work together to assure the timely cleanup of contaminated reaches of the Grand Calumet River, including review and approval of design plans for sediment cleanup and River restoration. Cooperate with the USACE to permit the Confined Disposal Facility (CDF) and allow the dredging of the Indiana Harbor to take place on schedule. Assure the remediation of contaminated former General Motors Corporation (GMC) sites in Indiana through the Response of Auto Communities Environmental Response (RACER) Trust and GMC bankruptcy settlement funds--Assure the appropriate remediation of contaminated former GMC sites in Indiana takes place through the established Trusts (RACER and GM--Anderson Insurance Proceeds.) Work together to assure available resources set aside for site cleanup and redevelopment are used appropriately and in compliance with the law.

Identify contaminated or formerly contaminated sites that may be suitable for renewable energy opportunities--In September of 2008, U.S. EPA launched an initiative titled. "Re-Powering America's Land: Sitting Renewable Energy on Potentially Contaminated Land and Mine Sites." The purpose of this initiative is to encourage and enable owners and potentially responsible parties (RP) to site renewable energy facilities on current and former contaminated properties across the country. There are many hurdles, technical, financial, political and legal, that must be addressed in order to site renewable energy facilities on these properties. U.S. EPA R5 and Indiana will work together to identify contaminated or formerly contaminated sites that are suitable for renewable energy properties.

Water Quality Joint Priorities

Develop and implement a schedule for conversion of general permits-by-rule to administratively issued general permits; by September 2011 Indiana will provide for U.S. EPA review a schedule for the agency's planned process for administrative issuance of general permits.

Homeland Security Joint Priorities

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

IDEM and U.S. EPA R5 will hold a COOP development training workshop and participate in a joint COOP exercise--Continuity of planning facilitates the performance of agency essential functions during all--hazards emergencies or other situations that may disrupt normal operations. The ultimate goal of continuity is the continuation of mission essential functions. Continuity planning is simply the good business practice of ensuring the execution of mission essential functions through all circumstances. Today's threat environment and the potential for non-notice emergencies, including localized acts of nature, accidents, technological emergencies, and military or terrorist related incidents, have increased the need for robust continuity capabilities and planning that enable agencies to continue their essential functions across a broad spectrum of emergencies.

Pollution Prevention Joint Priorities

Measurement of Solid Waste Diversion and Recycling--Continue to research and consider measurement options that will enable IDEM to accurately report the amount of solid waste that is diverted from disposal or recycled. Provide comment to U.S. EPA on the development of a national measurement methodology for solid waste recycling. Consider participation in pilot or demonstration projects to evaluate measurement systems.

IDEM and U.S. EPA R5 have met and identified the following Action Items. Action Items are items that can be worked on independently and are not necessarily addressed within the EnPPA.

Air Quality Program Action Items

Implementation of the Midwest Clean Diesel Initiative (MCDI) and Diesel Emission Reduction Act (DERA).

Cross Program Action Items

Update and reassess the agency's Environmental Justice Policy based on federal policy. Explore opportunities to work together in support of the Level 2 CARE grant in Gary and the sustainable development efforts in Indianapolis. Consider a possible joint enforcement targeting/ enforcement sweep in an area IDEM and U.S. EPA will identify together.

Update the IDEM Quality Management Plan (QMP)

Ensure the designated program system meet and comply with the Cross Media Electronic Reporting Regulation (CROMERR). This is for states that administer authorized programs under Title 40 and receive or wish to receive reports or documents electronically under those authorized programs.

Joint Planning and Evaluation Process

IDEM and U.S. EPA R5 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 timeline is as follows:

Actions	Deadlines
2011-2013 EnPPA Begins	July 1, 2011
Final Environmental Conditions Report (2009-2011 EnPPA)	Sept. 30, 2011
U.S. EPA Evaluation of State's Final Report (2009-2011 EnPPA)	Dec. 2011
Joint Assessment Process	June 2012
Joint Assessment Process Conditions Report	Sept. 30, 2012
U.S. EPA R5's Evaluation of Report	Dec. 2012
Senior Management Planning Meeting (2013-2015 EnPPA)	Feb 2013
IDEM/U.S. EPA Program-to-Program Meetings (2013-2015 EnPPA)	Feb/March 2013
Work Plan Negotiation (2013-2015 EnPPA)	April 2013
Work Plan Finalized (2013-2015 EnPPA)	May 2013
EnPPA and PPG Finalized (2013-2015 EnPPA)	June 2013
2013-2015 EnPPA Begins	July 1, 2013
2011-2013 EnPPA Final Environmental Conditions Report	Sept. 30, 2013

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 U.S. EPA R5 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 U.S. EPA R5 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 U.S. EPA R5 will jointly assess each program element and determine the appropriate course change, as needed. U.S. EPA R5 will review and act on new regulations in program areas that impact Indiana's authorization or where federal statute or regulation requires U.S. EPA review and approval of state actions (e.g., water quality standards).

Dispute Resolution Process

IDEM and U.S. EPA R5 will use the following agreed-upon dispute resolution process to handle the conflicts that may arise as this agreement is executed. The resolution process will be treated 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 timeframes 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. Timeframe: Disputes should be resolved as quickly as possible but within two weeks of the issue arising at the staff level. If unresolved at the end of two 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 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

While objective environmental quality measurements show that Hoosiers and our environment are safer today than at any time since data has been collected, a number of environmental challenges remain to be addressed. IDEM's history shows that IDEM can continue to build on their improvements in order to protect Hoosier health and our environment. Below IDEM would like to share some of the steps they've taken to provide a cleaner, healthier Indiana for our residents.

Air

Indiana's air quality has improved significantly in the last 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. In 2009, for the first time since air quality standards were developed in the 1970s, all Hoosiers were breathing air that met current health based standards. In 2010, the U.S. EPA set a new standard to further reduce exposure to lead in the air we breathe; as a result, approximately 700 Hoosiers currently

may be exposed to lead concentrations considered unacceptable under the new health standard. IDEM is working to ensure that these Hoosiers again have air that meets all health based standards.

Indiana operates and maintains more ambient air quality monitors per capita than other Midwestern states. A strong air quality monitoring network provides relevant data to communities and helps Indiana track the health-based air quality standards. With one ozone monitor for every 154,000 Hoosiers, Indiana's network is the most robust of its neighbors. Ohio has the closest ratio to Indiana, with one monitor for every 230,000 Buckeyes.

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 these federal standards, reducing Hoosier exposure to harmful air toxics. IDEM has worked to provide compliance assistance to industries subject to these new standards. Risk assessment capabilities have also been developed to investigate air toxics and better understand risks at the community and state level.

Recently, IDEM conducted a detailed air toxics study in Southwest Indianapolis, finding that concentration levels were acceptable and similar to other Midwest areas. U.S. EPA additionally began a nationwide initiative to obtain air quality at schools, with IDEM participating with monitoring at four Indiana schools. 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.

IDEM's air permitting program has made tremendous progress in reducing permit backlog and issuing permits in a timely fashion. In 2009, all original backlogged permits were completed, and IDEM continued to lower the average number of days for permit completion from 141 to 127 days. U.S. EPA was instrumental in accomplishing these improvements. Further efficiency improvements are planned for the air permit program.

IDEM will continue to work to reduce pollutant levels so every Hoosier has healthy air to breathe. IDEM's Office of Air Quality (OAQ) challenges include working with the U.S. EPA to achieve anticipated outcomes as a result of completing the priorities listed in the OAQ section of this agreement.

Non-PPG State Activities

Open Burning Permits
Asbestos Accreditation
Rule Revisions
Community Outreach Efforts
Area Source National Emissions Standards Hazardous Air Pollutants (NESHAPs)
Government Efficiency
Air $PM_{2.5}$ Section 103-activities under CFDA 66.034
Title V Air Permit Program
Diesel Emission Reduction Act (DERA)
Asbestos Hazard Emergency Response Act (AHERA) Asbestos in Schools

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. IDEM encourages responsible management of regulated facilities--one example is the Clean Yard Program, which educates and encourages auto salvage facilities to go above and beyond the requirements of the law. Currently, 12 facilities have been recognized, with another 47 applications under review.

In addition to other programs, IDEM has and will continue to focus on corrective actions at hazardous waste facilities and leaking underground storage tanks. Considerable resources have been focused to obtain and address the environmental indicators established through the Government Performance and Results Act. In addition to corrective actions, IDEM is working to establish preemptive processes. New rules have been implemented to help strengthen the protection of underground storage tanks, and a free training program for owners and operators is currently in development. A non-notifier program was also implemented, in partnership with the Indiana Manufacturer's Association, to contact unregistered manufacturing facilities and provide compliance assistance.

There are currently 1,988 animal operations permitted in Indiana and inspected on a routine basis. These include 631 concentrated animal feeding operations (CAFOs) and 1,357 smaller feeding operation called confined feeding operations (CFOs). Indiana's standards for CAFOs are stricter than federal regulations. While the federal regulations for CAFOs do not contain standards for the construction of manure storage facilities, Indiana has had construction standards and requirements in place since the mid-1970s. Additionally, though not required by U.S. EPA, IDEM also regulated CFOs under a state rule. IDEM's CFO program includes operational requirements for the land application of manure.

Indiana uses six main programs to ensure the cleanup of contamination. The Emergency Response program, which receives over 3,000 calls annually, addresses contamination from spills that are often completely cleaned up during the initial response. If the contamination cannot be cleaned up through emergency response action, the responsibility is transferred to one of IDEM's other cleanup programs. IDEM works through the federal Superfund program, and its state counterpart, the State Cleanup Program. Hazardous waste cleanup falls under the state's Resource Conservation and Recovery Act program, which is regulated under the Federal Act and the Underground Storage Tank Program also deals with contamination from petroleum. Indiana also has a Voluntary Remediation Program that allows responsible parties to clean up contaminated properties under IDEM supervision. In the last several years, hundreds of contaminated sites have been addressed through the diligent work of IDEM staff.

A major priority for IDEM has been work on the Grand Calumet River and Indiana Harbor Shipping Canal. Currently, a project in the West Branch of the Grand Calumet River is underway to remove 131,000 cubic yards of contaminated sediment. Following the dredging a reactive cap will be added, sealing off remaining contaminants. This project, planned for completion in 2011, is only the first of several in the Area of Concern. Construction and remediation is scheduled to start in 2011 in 25 acres of Roxanna Marsh; an additional segment of the West Branch is under consideration; and a project in the East Branch of the Grand Calumet River will restore not only a portion of the stream, but an additional 80 acres of wetlands.

Along with educating and providing technical assistance to businesses, and communities, IDEM's work to issue permits, conduct inspections, respond to accidental spills and oversee cleanups continues to foster marked improvement in the state's land quality each year.

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.

Non-PPG State Activities

- Solid waste processing facilities
- Solid waste disposal sites
- Waste tire processing and storage sites
- Waste tire transporters
- Vegetative compost sites
- Septage haulers and land application sites
- Confined feeding operations that are smaller than CAFOs
- Auto salvage sites
- Industrial waste generators
- Open dump complaints
- Voluntary Remediation Program and State Clean Up
- Underground Storage Tank Excess Liability Trust Fund Program
- Methamphetamine Clean Up
- Twenty-four/Seven Emergency Response Program

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. Based on the proposed 2010 303(d) List of Impaired Waters, IDEM has assessed over 33,473 stream miles, which is over 83% of the streams in Indiana. IDEM has site-specifically assessed approximately 41.8% of Indiana's stream miles for recreational uses and has found that 24.4% (4,104 miles) of those assessed are fully supporting of full body contact recreational uses. Approximately 48.9% of Indiana's stream miles have been assessed for aquatic life use support, and 71% of these (13,941 miles) were found to be fully supporting of healthy aquatic communities (macro invertebrates and/or fish). Prior to 2005, only 18,400 stream miles had been assessed.

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 on and address water impairments. The proposed 2010 303(d) List of Impaired Waters, currently under review with U.S. EPA, identifies waterbodies not meeting Indiana's water quality standards. IDEM continues to develop total maximum daily load (TMDL) calculations, as required by Section 303(d) of the Clean Water Act, 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 nonpoint source pollution through utilization of the 319 grant funds.

Watershed management has become the heart of successful water quality restoration and protection. Coordinated efforts between IDEM and local communities and targeted use of 319 grant funds have helped launch projects estimated to prevent over 500,000,000 pounds of sediment, 332,000 pounds of phosphorus and 546,000 pounds of nitrogen from entering rivers and streams annually. Assessments of segments of Big Walnut Creek, Clifty Creek, and Pigeon Creek show quality has improved significantly, and previously polluted portions of these streams now meet water quality standards. Additionally, the creation of the comprehensive www.watersheds.IN.gov continues to provide resources for Hoosiers to learn how they can improve water quality in the state.

IDEM recognizes the need to timely issue National Pollutant Discharge Elimination System (NPDES) permits and maintain adequate compliance and enforcement of those permits to reduce water impairments resulting from point sources. During the 2009-2011 EnPPA cycle, IDEM reduced the number of expired industrial NPDES permits to just two, complex renewals for steel mills. Additionally, IDEM has made significant progress on the initiative to have long term control plans (LTCPs) in place to reduce the incidence of combined sewer overflows (CSOs), which also contribute to the impairment of Indiana's waters. Currently 104 Indiana CSO communities have approved plans to develop and/or implement a LTCP, and are under timelines detailed in enforceable documents.

Reduction of impairments is critical for the protection of Indiana's public water supply systems (PWSSs). IDEM has assessed most of Indiana's PWSSs to inventory potential contaminants and determine water system susceptibility to contamination. IDEM works with PWSSs 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. Currently, over 99% of the population served by community systems receives drinking water that meets all state and federal requirements.

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.

State Activities not included in this PPG:

- Overall program leadership, operational and administrative support
- State construction permits for wastewater
- Data support, QA/QC and GIS
- Operator assistance at wastewater treatment plants
- Wastewater operator certification
- Ground water programs
- State construction permits for water, capacity development for drinking water systems and drinking water operator certification
- 319 Nonpoint Source (NPS) Reduction Grant Program and 205(j) Water Quality Planning Grant Program
- State Revolving Fund (SRF) loan program

Outlook

Indiana, in partnership with U.S. EPA 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.

Air Quality

Air Permits Branch

Title V Operating Permits (TVOPs)		A-1
Contact(s): Matt Stuckey	U.S. EPA Contact(s): Pamela Blakley	Due Date: June 30, 2012
U.S. EPA Role: Provide program assistance.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: State

Issue all TVOPs in a timely manner consistently with federal and state requirements:

a) Track progress of all TVOP applications received by IDEM.
Status:

b) Timely issuance of all Title V operating permits – IDEM will ensure that progress is made on all pending initial TVOP applications.
Status:

c) Timely issuance of all Title V permit renewals – IDEM will ensure progress is made on all pending TVOP renewal applications so that these renewals are issued prior to the expiration of their current TVOP or for late applications are issued within nine months of receipt of the application.
Status:

d) Provide quarterly updates to the Reasonably Available Control Technology/Best Available Control Technology/Lowest Achievable Emission Rate (RACT/BACT/LAER) Clearinghouse.
Status:

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

Title V Operating Permitting (TVOP) Program		A-2
Contact(s): Matt Stuckey	U.S. EPA Contact(s): Pamela Blakley	Due Date: To be established.
U.S. EPA Role: Work with IDEM, U.S. EPA and OAQPS to grant TV program approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: State

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

b) U.S. EPA will provide support and guidance to IDEM on permitting high efficiency energy generation initiatives.
Status:

c) U.S. EPA will provide support to IDEM in developing and issuing flexible permits.
Status:

Article 2 Rule Revisions		A-3
Contact(s): Matt Stuckey	U.S. EPA Contact(s): Pamela Blakley	Due Date: To be established.
U.S. EPA Role: Work with IDEM, U.S. EPA and external stakeholders to evaluate, develop and approve, revisions to Indiana's air permitting rules (326 IAC 2).		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: < 10% PPG/State

a) U.S. EPA will assist IDEM in its efforts to assess current air permitting regulations and determine areas that require revisions to provide more clarity, consistency and allow for efficient implementation of these regulations. U.S. EPA will provide guidance and assistance to ensure that the revisions will ultimately be approvable as part of Indiana's SIP.
Status:

Air Compliance and Enforcement Branch

Compliance Monitoring Strategy (CMS) for Title V and Federally Enforceable State Operating Permit (FESOP)		A-4
Contact(s): Phil Perry	U.S. EPA Contact(s): Brent Marable, Debra Flowers, & Rochelle Marceillars	Due Date: September 30, 2013
U.S. EPA Role: Review Clean Air Act Stationary Source Compliance Monitoring Strategy (CMS) Policy and work closely with OAQ staff to ensure any issues are satisfactorily addressed.		

Goal 5: Enforcing environmental laws.
Objective 5.1: Enforce environmental laws.
Funding: PPG

Develop and implement the CMS plan for Title V and FESOP source inspections and FESOP source and compliance evaluations consistent with the September 2010 Clean Air Act Stationary Source Compliance Monitoring Strategy.

a) Submit CMS plan for review and negotiation with U.S. EPA by August 31, 2011, and August 31, 2012. Implementation of the final CMS plan will begin the upcoming FY12 on October 1, 2011, and October 1, 2012. The CMS plan should meet the 2011 CAA Stationary Source CMS policy. The CMS source category and frequency flags in AFS will be completed by IDEM for the Title V major and synthetic minor with the potential to emit at or above 80% major source threshold (SM80) source universe by December 15, 2011, and December 15, 2012.
Status:

b) U.S. EPA shall submit a written response to IDEM concerning the CMS plan by December 31, 2011, and December 31, 2012.
Status:

c) Implement the CMS plan for full compliance evaluations:
- Conduct full compliance evaluations of Part 70 sources once every two years, except mega-sites, gas compressor stations, and gas turbines facilities.
- Mega-sites will be identified in the CMS plan and a full compliance evaluation of those sites will be conducted once every three years.
- Gas compressor stations and gas turbines facilities will be identified in the CMS plan and full compliance evaluations of those sites will be conducted once every five years.
- Conduct full compliance evaluations of all FESOP sources once every five years except, as noted in the CMS.

- 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.

Status:

d) Submit compliance and enforcement information to meet U.S. EPA's Minimum Data Requirements (MDRs) within the 60 day standard required for reporting by the 2005 and 2008 Air Facility System (AFS) Information Collection Request (ICR), 1998 Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, and the 1986 Guidance on Federal Reportable Violations (FRVs) for stationary sources. Ensure data is complete, accurate, and timely; consistent with U.S. EPA policies and ICR.

Status:

e) Respond to complaints including those referred from U.S. EPA. Inspections are conducted where necessary.

Status:

f) U.S. EPA will provide compliance and enforcement support, guidance, and make training available to IDEM staff as needed.

Status:

g) Prepare enforcement cases according to IDEM's Compliance and Enforcement Response Nonrule Policy (CERP) and guidance, and U.S. EPA's Timely and Appropriate Enforcement Response to High Priority Violations Policy. IDEM will review findings and prepare enforcement cases according to the HPV Policy, IDEM CERP and guidance, and the IDEM Civil Penalty Nonrule Policy for noncompliance with statutes, rules, or permits.

Status:

h) Participate in enforcement/settlement negotiation conferences and follow-up on the requirements of IDEM's agreed and/or commissioners orders.

Status:

i) U.S. EPA and IDEM will conduct monthly conference calls to discuss planning, program progress, compliance and enforcement issues, HPV, data management and reporting, and efforts to resolve violations. For state lead HPV cases unaddressed over the 270 day timeframe, U.S. EPA and IDEM will determine which agency is best suited to take or maintain the lead for the case and what will be the best method of returning the source back into compliance. Any data issues will also be discussed on these monthly conference calls.

Status:

j) IDEM will track and update U.S. EPA quarterly on the recommendations made from the Round 3 State Review Framework until completion.

Status:

k) IDEM will provide to U.S. EPA quarterly updates of the status code and explanation for HPV sources listed on U.S. EPA Headquarters Watch List as a state lead. The Watch List ensures timely and appropriate response to significant noncompliers or longstanding violators through better data analysis and routine discussions between U.S. EPA Headquarters OECA, U.S. EPA R5, and/or IDEM.

Status:

Compliance Monitoring Strategy (CMS) for Asbestos		A-5
Contact(s): Phil Perry & Dan Stamatkin	U.S. EPA Contact(s): Brent Marable, Debra Flowers, and Rochelle Marceillars	Due Date: September 30, 2013
U.S. EPA Role: Review delegation authority to implement and enforce the 40 CFR, Part 61, National Emission Standards for Asbestos. Work closely with OAQ staff to ensure any issues are raised and satisfactorily addressed.		

Goal 5: Enforcing environmental laws.
Objective 5.1: Enforce environmental laws.
Funding: PPG

Implement a compliance and enforcement program for asbestos inspections and compliance evaluation of asbestos notifications, licensed asbestos contractors, and stationary asbestos sources.

a) Submit annual reports to U.S. EPA on asbestos demolition/renovation notifications submitted by the owner/operator, compliance evaluations conducted, and enforcement actions initiated by IDEM. The report will be submitted alphabetically by owner/operator and includes the numbers of asbestos demolition/renovation notifications received, warning letters, NOV's, referrals, agreed orders, state court orders/decrees, and penalties assessed.
   Status:

Air Monitoring Branch

Conduct Ambient Air Quality Monitoring Throughout Indiana		A-6
Contact(s): Richard Zeiler & Steve Lengerich	U.S. EPA Contact(s): Loretta Lehrman	Due Date: Ongoing.
U.S. EPA Role: Regulatory advice, funding, and review.		

Goal 1:Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

a) Operate monitors for National Ambient Air Quality Standards (NAAQS) pollutants and Photochemical Assessment Monitoring Stations (PAMS) according to 40 CFR 58, approved monitoring plans, and the quality management plan/quality assurance project plans (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 U.S. EPA R5.
   Status:

c) 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:

d) Investigate new analytical methods of testing through new equipment.
   Status:

e) Ensure adequate, independent QA audits of NAAQS monitors.
   Status:

f) Conduct speciation monitoring for $PM_{2.5}$ and submit data to the Air Quality System (AQS).
   Status:

g) Conduct aethalometer monitoring.
   Status:

h) Operate, evaluate, and improve monitoring procedures and data reporting of the PAMS monitoring in Northwest Indiana.
Status:

i) Continue to use the Interagency Monitoring of Protected Visual Environmental (IMPROVE)-style carbon samplers at $PM_{2.5}$ speciation trends and supplemental sites.
Status:

j) Continue to operate the source and population-oriented monitors for the revised Lead (Pb) Standard.
Status:

k) Continue to operate NCore site in Indianapolis.
Status:

l) Site new NAAQS stations as required for SO_2 source-oriented monitoring.
Status:

m) Site new NAAQS stations are required for near-roadway NO_2 and CO monitoring to be operational by January 1, 2013.
Status:

Monitor for Air Toxics		A-7
Contact(s): Steve Lengerich, Balvant Patel, & Brian Wolff	U.S. EPA Contact(s): Loretta Lehrman, Motria Caudill, & Carl Nash	Due Date: Ongoing.
U.S. EPA Role: Risk assessment and data analysis advice, special grant funding and review. Collaborate with IDEM as appropriate to evaluate and mitigate localized air toxics.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

Conduct effective non-criteria pollutant monitoring.

a) Maintain Indiana Air Toxic Monitoring Program.
Status:

b) Conduct toxics monitoring at Whiting High School in Whiting.
Status:

c) Conduct RadNet monitoring in Indianapolis.
Status:

d) IDEM and U.S. EPA will continue to collaborate in the evaluation of localized air toxics data as warranted. Assessments shall include a determination of visible pollution prevention measures to assist in mitigation as appropriate.
Status:

Make Air Monitoring Information Publicly Available		A-8
Contact(s): Steve Lengerich	U.S. EPA Contact(s): Loretta Lehrman & Pat Schraufnagel	Due Date: Ongoing.
U.S. EPA Role: Advice, funding, and review.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

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

a) Perform a quality assurance (QA) network evaluation.
Status:

b) Conduct data analysis to determine improvement, degradation, etc. of air quality.
Status:

c) Perform annual industry evaluations (systems audit).
Status:

d) Annually review and update OAQ Quality Assurance Manual.
Status:

e) Submit National Ambient Air Quality Standards (NAAQS) pollutant data, Photo-chemical Analytical Monitoring Stations (PAMS) and QA data to Air Quality Standard (AQS) according to schedule in 40 CFR 58.
Status:

f) Produce daily and hourly ozone; and $PM_{2.5}$ data and maps to be posted on the Internet as per U.S. EPA Ozone and $PM_{2.5}$ Mapping Projects.
Status:

g) Maintain air quality index (AQI) reporting in designated cities.
Status:

h) Certify NAAQS pollutant data in AQS and provide supporting documentation by the schedule in 40 CFR 58.
Status:

i) Ozone, $PM_{2.5}$ and meteorological data should be submitted to AIRNOW.
Status:

Leading Environmental Analysis and Display System (LEADS ®)		A-9
Contact(s): Steve Lengerich	U.S. EPA Contact(s): Loretta Lehrman	Due Date: Ongoing.
U.S. EPA Role: Advise, funding, and review.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

Collect real-time air quality information using LEADS ®.

a) Maintain automatic calibration equipment at all continuous monitoring sites.
Status:

b) Deploy LEADS® at all newly established continuous monitoring site locations.
Status:

c) Provide current data from all active continuous monitoring sites to the public via the agency website.
Status:

d) Provide past data from active continuous monitoring sites and past data from recently discontinued sites.
Status:

Persistent Bioaccumulative Toxics Great Lakes Air Deposition		A-10
Contact(s): Brian Wolff	U.S. EPA Contact(s): Erin Newman	Due Date: Ongoing.
U.S. EPA: Timely guidance, review, and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

IDEM will undertake several activities to evaluate persistent bioaccumulative toxics (PBTs):

a) IDEM will support emissions inventory work regarding PBTs.
Status:

b) IDEM will use staff time to identify and quantify source types and emissions that contribute PBTs to lakes through atmospheric deposition.
Status:

c) IDEM will analyze and interpret historic PBT monitoring information in Indiana.
Status:

d) U.S. EPA will provide timely guidance, review, and approval.
Status:

Air Programs Branch

Ozone and $PM_{2.5}$ Re-designation Petitions and Maintenance Plans		A-11
Contact(s): Scott Deloney	U.S. EPA Contact(s): John Mooney	Due Date: Ongoing.
U.S. EPA: Timely guidance, review and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

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

a) Public comment period to commence within eight months of quality assurance/quality control (QA/QC) of monitoring data.
Status:

b) Final submittal to U.S. EPA to be made within 10 months of QA/QC of monitoring data.
Status:

c) U.S. EPA will provide timely guidance, review, and approval.
Status:

Preliminary Designation Recommendations for SO_2		A-12
Contact(s): Sarah Raymond	U.S. EPA Contact(s):John Mooney	Due Date: See below.
U.S. EPA Role: Timely guidance, review and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

Conduct analysis, develop, and submit designation recommendations to U.S. EPA concerning SO_2 standard.

a) Provide initial recommendations by June 2011.
- May 2011 ready for senior management review.

Status:

Rule and State Implementation Plan Preparation – for SO_2		A-13
Contact(s): Chris Pederson	U.S. EPA Contact(s):John Mooney	Due Date: See below.
U.S. EPA Role: Timely guidance, review, and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

Conduct modeling analysis, establish emission limitations, and monitoring requirements to support approval attainment and maintenance SIPs.

a) First notice for rulemaking May 2011.
Status:

b) Modeling complete August 2011.
Status:

c) Second notice of rulemaking November 2011.
Status:

d) SIPs submitted June 2013.
Status:

e) U.S. EPA will provide timely guidance, review, and approval.
Status:

Article 2 Revisions		A-14
Contact(s): Scott Deloney	U.S. EPA Contact(s): Pamela Blakley	Due Date: See below.
U.S. EPA Role: Timely guidance, review, and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

a) IDEM requested U.S. EPA R5 involvement in the Article 2 rulemaking activities. This includes the Article 2 initiative short-term and long term rules, the permitting fee rulemaking, a rulemaking that pertains to SSOAs and permits by rule, and any other Article 2 rulemaking to obtain U.S. EPA approval of Indiana's permitting program.
Status:

b) IDEM will ensure early coordination and consultation with U.S. EPA R5.
Status:

c) U.S. EPA will provide timely guidance, review, and approval.
Status:

Lead Designations and Implementation Plans		A-15
Contact(s): Scott Deloney	U.S. EPA Contact(s: John Mooney	Due Date: See below.
U.S. EPA Role: Timely guidance, review, and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

Conduct analysis, develop, and submit designation recommendations to U.S. EPA concerning the 2008 lead NAAQS.

a) Provide U.S. EPA with attainment demonstration for Muncie area by June 2012.
Status:

Ozone Designations		A-16
Contact(s): Scott Deloney	U.S. EPA Contact(s): John Monney	Due Date: See below.
U.S. EPA Role: Timely guidance, review, and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

Conduct analysis, develop, and submit designation recommendations to U.S. EPA concerning the 2011 ozone NAAQS.

b) Provide initial ozone designation recommendations by March 2012 (assuming standard is issued in July 2011).
Status:

Greenhouse Gas (GHG) Tailoring Rule for Prevention of Significant Deterioration (PSD) and Title V		A-17
Contact(s): Chris Pederson	U.S. EPA Contact(s): John Mooney	Due Date: To be established.
U.S. EPA Role: Timely guidance, review, and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG/State Fees (Title V Ineligible)

a) IDEM will submit final rules for approval by U.S. EPA.
Status:

b) Approval of PSD GHG Tailoring Rule provision into the SIP.
Status:

c) Approval of Title V program revisions to address the GHG Tailoring Rule.
Status:

$PM_{2.5}$ PSD/New Source Review (NSR) Rules		A-18
Contact(s): Chris Pederson	U.S. EPA Contact(s): John Mooney	Due Date: To be established.
U.S. EPA Role: Timely guidance, review, and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: PPG

a) IDEM will adopt PSD/NSR rule revisions to implement $PM_{2.5}$ and submit those rules for approval by U.S. EPA, upon receipt of necessary guidance from U.S. EPA.
Status:

b) Approval of PSD/NSR $PM_{2.5}$ provisions into the SIP.
Status:

Environmental Justice		A-19
Contact(s): Brian Wolff	U.S. EPA Contact(s): Carlton Nash	Due Date: June 2012
U.S. EPA Role: Provide guidance to IDEM upon request.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: Federal

IDEM will perform a detailed evaluation of the "high risk facilities" identified by the 2005 National Air Toxics Assessment (NATA). The evaluation of facilities will be prioritized based on level of potential risk and environmental justice-related statistics. Action steps of this project include:

a) IDEM will evaluate and verify emission-related information and inputs used in the 2005 NATA for each high risk facility identified. IDEM will then use the most current information available to identify the level of risk that is most representative for each facility. IDEM will use U.S. EPA's "high risk" threshold to determine whether further evaluation is warranted.
   Status:

b) IDEM will prioritize the remaining facilities based on a scale weighted by a combination of environmental justice factors and the potential risk posed by the applicable facility.
   Status:

c) IDEM will perform local scale air dispersion modeling and air toxics screening analyses to evaluate in greater detail the potential risk posed by each facility. The results from this task will be reprioritized based on the weighted scale used in step b.
   Status:

d) IDEM will assess the compliance status of each source based on the identified level of priority. Also based on the prioritized results, IDEM will explore potential pollution prevention and risk reduction opportunities.
   Status:

e) IDEM will prepare a report outlining the results of the project, which shall include observations and conclusions regarding environmental justice implications associated with the risk of air toxics exposure, the accuracy of the 2005 NATA for sources evaluated as part of this project, and the benefits associated with risk reduction initiatives (if applicable.)
   Status:

Air Toxics in Schools Initiative		A-20
Contact(s): Brian Wolff	U.S. EPA Contact(s): Motria Caudill	Due Date: To be established.
U.S. EPA Role:		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: Federal

a) U.S. EPA and IDEM will evaluate historic particulate filters for metal concentrations (primarily manganese and lead). This evaluation will support a trend analysis and site comparison of key compounds associated with the School Air Toxics Initiative.
   Status:

b) IDEM will provide assistance to U.S. EPA as needed regarding the review, interpretation, and communication of risk and air toxics monitoring results for Indiana schools included in the U.S. EPA Schools Air Toxics Initiative.
   Status:

Land Quality

Resource Conservation Recovery Act (RCRA) Corrective Action		L-1
Contact(s): Vic Windle & Mike Sickels	U.S. EPA Contact(s): Hak Cho and George Hamper	Due Date: See below
U.S. EPA Role: Contractor support for sampling and risk review at selected sites.		

Goal 3: Cleaning up communities and advancing sustainable development.
Objective 3.2: Preserve land.
Funding: PPG

Meet the requirements of the Resource Conservation and Recovery Act (RCRA) Government Performance and Results Act (GPRA).

a) IDEM will work with U.S. EPA to establish reasonable deadlines for specific facilities. IDEM will issue permits, orders, and voluntary agreements that will help achieve U.S. EPA's 2020 GPRA goals.
   Status:

b) For the 2020 Universe facilities IDEM will achieve the following GPRA correction action goals:
   - By September 30, 2011: 74% of the CA725, 66% for the CA750 and 41% for CA550.
     Status:
   - By September 30, 2012: 76% of the CA725, 69% for the CA750 and 45% for CA550.
     Status:
   - By June 30, 2013: 77% of the CA725, 70% for the CA750 and 46% for CA550.
     Status:

c) IDEM will work with U.S. EPA to establish specific goals for the land revitalization initiative.
   Status:

Hazardous Waste Permitting and Post-Closure		L-2
Contact(s): Vic Windle	U.S. EPA Contact(s): Jae Lee	Due Date: June 30, 2011 & June 30, 2013
U.S. EPA Role: Provide program assistance.		

Goal 3: Cleaning up communities and advancing sustainable development.
Objective 3.2: Preserve land.
Funding: PPG

Complete hazardous waste facility permitting actions in accordance with U.S. EPA Government Performance and Results Act (GPRA) goals. Priority will be given to permit application submittals that are subject to Indiana's permit accountability statute. U.S. EPA is in the process of developing 2011-2015 permit and renewal baselines. The baseline will be completed by the end of June 2011.

a) Issue permit renewals to 100% of the 2011-2015 baseline facilities whose expiration dates are before September 3, 2013, by September 30, 2013.
   Status:

b) Bring 98% of the 2011-2015 baseline facilities "under control" (permit or order) by September 30, 2013.
   Status:

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Generators		L-3
Contact(s): John Crawford	U.S. EPA Contact(s): Lorna Jereza	Due Date: July 1, 2011-June 30, 2013
U.S. EPA Role: Conduct inspections at, at least six large quantity generators (LQGs). Inspect other installations handling hazardous waste: Criteria for U.S. EPA's selection of installations include: (a) Requests from IDEM, (b) Installations subject to open Federal enforcement judicial and/or administrative decrees/orders, (c) Installations that have not been inspected in the past, (d) Installations under regional and national priority sectors and/or initiatives.		

Goal 3: Cleaning up communities and advancing sustainable development.
Objective 3.2: Preserve land.
Funding: PPG

Annually, IDEM will conduct a Compliance Evaluation Inspection (CEI) at generators identified in the RCRAInfo database.

a) At least 20% of the large quantity generator (LQG) universe that exists as of June 1 of that respective year will be inspected.
Status:

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Treatment, Storage, and Disposal Facilities (TSDs)		L-4
Contact(s): Theresa Bordenkecher	U.S. EPA Contact(s): Lorna Jereza	Due Date: July 1, 2011-June 30, 2013
U.S. EPA Role: U.S. EPA R5 will independently inspect the boiler and industrial furnace units at all four TSDs every other year, and inspect at least two additional operating TSDs for all permit requirements for each year. U.S. EPA will perform annual inspections at all operating TSDs owned or operated by state and local governments.		

Goal 3: Cleaning up communities and advancing sustainable development.
Objective 3.2: Preserve land.
Funding: PPG

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		L-5
Contact(s): Nancy Johnston	U.S. EPA Contact(s): Lorna M. Jereza	Due Date: July 1, 2011-June 30, 2013
U.S. EPA Role: Issue enforcement responses to RCRA violations detected by U.S. EPA, or referred to U.S. EPA by IDEM, in accordance with U.S. EPA's 2003 Hazardous Waste Civil Enforcement Response Policy, U.S. EPA's RCRA Civil Penalty Policy, and relevant U.S. EPA enforcement strategies.		

Goal 3: Cleaning up communities and advancing sustainable development.
Objective 3.2: Preserve land.
Funding: PPG

a) Issue enforcement responses to RCRA violations in accordance with IDEM's enforcement response strategy and U.S. EPA's 2003 Hazardous Waste Civil Enforcement Response Policy.
Status:

Polychlorinated Biphenyl (PCB) Inspections		L-6
Contact(s): John Crawford	U.S. EPA Contact(s): Kendall Moore	Due Date: July 1, 2011-June 30, 2013
U.S. EPA Role: Review IDEM's PCB inspection reports and, if necessary, issue the appropriate enforcement response. Provide technical assistance and guidance on federal PCB regulations. Conduct mid-year and year-end reviews. Provide continuing, refresher training to experienced inspectors and basic field investigation training to new inspectors.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.

Objective 4.1: Ensure chemical safety.
Funding: PPG

a) Conduct 29 TSCA PCB inspections for FY12 and 27 PCB inspections for FY13.
Status:

b) Inspection reports will include penalty calculations when violations are identified.
Status:

c) IDEM will continue to participate in U.S. EPA's current electronic inspection pilot program. IDEM will research, procure, and assess an additional electronic field data collection system on a pilot basis. IDEM will provide feedback on issues and/or improvements that can be made to hardware and software for this e-field activity.
Status:

d) Continue to oversee PCB cleanups and provide technical assistance to the regulated community. Provide a yearly summary report detailing the status of oversight activities for each fiscal year.
Status:

e) Work with PTCS in the annual targeting of facilities for TSCA PCB inspections, including critical points within natural gas pipeline transmission and distribution systems.
Status:

f) IDEM will provide a quarterly inspection summary in lieu of individual FITS forms.
Status:

Resource Conservation Recovery Act (RCRA) RCRAInfo		L-7
Contact(s): Greg Overtoom	U.S. EPA Contact(s): Allen Melcer	Due Date: Monthly.
U.S. EPA Role: Provide program assistance.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.1: Ensure chemical safety.
Funding: PPG

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

a) IDEM will migrate the Indiana RCRA Activities Tracking System (IRATS) into the agency's Environmental Information System (EIS), IDEM's agency-wide database. IRATS migration into the EIS is tentatively scheduled for the fourth quarter of 2011. 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 the EIS integration will be completed during the 3rd quarter of 2011.
Status:

c) Develop Biennial Report online reporting application and migrate to EIS for the 2012 reporting year.
Status:

d) IDEM is committed to continuing to work with U.S. EPA on completing the switch to the Exchange Network as the means for regulatory reporting wherever it makes good business sense.

Status:

Rule Development		L-8
Contact(s): Mike Dalton	U.S. EPA Contact(s):Mary Setnicar	Due Date: June 30, 2013
U.S. EPA Role: Many rule updates are promulgated by U.S. EPA and IDEM mutually agreed upon time frames. Regarding the Research, Development and Demonstration Rule (RDD), U.S. EPA will provide assistance where applicable.		

Goal 5: Enforcing environmental law.
Objective 5.1: Enforce environmental law.
Funding: PPG

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 timeframe.

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		L-9
Contact(s): Charles Grady & Mike Dunn	U.S. EPA Contact(s): Steve Jann & Pat Kuefler	Due Date: June 30, 2012 and June 30, 2013
U.S. EPA Role (Water Division): Provide training on conducting CAFO inspections to IDEM staff, as requested. U.S. EPA R5 will be leading on enforcement where there is non-compliance with existing federal orders or where non-compliance is documented through a federal lead inspection.		

Goal 3: Cleaning up communities and advancing sustainable developments.
Objective 3.2: Preserve land.
Funding: PPG

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

Status:

b) Issue NPDES permits to all CAFOs within Indiana's statutory timeframes.

Status:

Water Quality

Impaired Waters List and Water Quality Report		W-1
Contact(s): a) Marylou Renshaw & Jody Arthur b) Marylou Renshaw, Cyndi Wagner & Lee Bridges	U.S. EPA Contact(s): a) Peter Swenson & Jonathan Burian, b) Linda Holst, Ed Hammer, & Mari Nord	Due Date: a) April 1, 2012 b) December 31, 2011 & December 31, 2012
U.S. EPA 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.		

Goal 2: Protecting America's waters.
Objective 2.2: Protect and restore watersheds and aquatic eco-systems.
Funding: PPG

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. Complete quality assurance of information in ADB to ensure consistency with 303(d) list and other IR categories. Provide additional IR information (e.g., assessment methodology, GIS files) in other appropriate formats as required by the IR Guidance (U.S. EPA PAM WQ-7).
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. During the current sampling season (summer 2011) IDEM will sample a minimum of 38 sites in the White River, West Fork basins. Next sampling season (summer 2012) IDEM will sample a minimum of 38 sites in the Patoka River basin. (U.S. EPA PAM WQ-5)
Status:

Total Maximum Daily Loads (TMDLs)		W-2
Contact(s): a) & c) Marylou Renshaw & Bonnie Elifritz b) Marylou Renshaw, Cyndi Wagner, & Lee Bridges	U.S. EPA Contact(s): a) Peter Swenson b) Linda Holst & Ed Hammer	Due Date: a) September 30, 2011 & 2012 b) December 31, 20011 & 2012
U.S. EPA Role: a) Timely review and comment, and contractor assistance, b) Provide guidance/other information on identifying causes/sources of impairment.		

Goal 2: Protecting America's waters.
Objective 2.2: Protect and restore watersheds and aquatic eco-systems.
Funding: State

a) Total maximum daily loads (TMDLs) on water body segments – 90 TMDLs will be developed by September 30, 2011, and another 75 will be developed by September 30, 2012, with the number for 2013 to be determined in accordance with the pace set by U.S. EPA.
Status:

b) Targeted monitoring studies - Monitor waters to provide information on sources and causes of impairments for use in the development of TMDLs and/or watershed plans. Depending on resources and following the plans outlined in the IDEM Monitoring Strategy, IDEM will do one to ten studies per sampling season.
Status:

Wetland and Stream Impacts and Storm Water Permits		W-3
Contact(s): Mary Hollingsworth & Randy Braun	U.S. EPA Contact(s): a) Peter Swenson b)Brian Bell	Due Date: a) & b) Ongoing.
U.S. EPA Role: Provide program assistance.		

Goal 2: Protecting America's waters.
Objective 2.2: Protect and restore watersheds and aquatic eco-systems.
Funding: Federal/State (Wetlands Mapping Impacts Grant)

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

b) Storm water permits – Review applications and issue appropriate permits for construction, municipal and industrial discharges of storm water.
Status:

Office of Water Quality (OWQ) Permits		W-4
Contact(s): a) Paul Higginbotham & Jerry Dittmer b) Paul Higginbotham & Stan Rigney	U.S. EPA Contact(s): a) Kevin Pierard b) Kevin Pierard	Due Date: See below.
U.S. EPA Role: Provide timely review, technical assistance, and comment and identify issues at an early stage in the process. Review and provide timely feedback 60 days after receipt of permit to ensure that IDEM reissues these permits by December 31, 2011. Review NPDES discharge permits greater than 5 MGD in the Lake Michigan basin and all direct dischargers to Lake Michigan.		

Goal 2: Protecting America's waters.
Objective 2.1: Protect human health.
Funding: State

a) Municipal National Pollutant Discharge Elimination System (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:
   - Maintain the backlog of industrial permits to 10% or less.
     Status:
   - Issue new industrial NPDES permits within statutory timeframes.
     Status:
   - Re-issue all identified major industrial permits which have expired for more than 10 years by the end of calendar year, December 31, 2011.
     Status:
   - Re-issue all identified major industrial permits which have expired for more than 10 years by end of calendar year, December 31, 2011; includes Arcelor Mittal East IN0000175 and Arcelor Mittal West IN0000205
     Status:

Compliance Monitoring Strategy (CMS) for Wet Weather Programs, Combined Sewer Overflow (CSO) Long Term Control Plans (LTCP), Sanitary Sewer Overflow (SSO) and Storm Water		W-5
Contact(s): a) & b)Paul Higginbotham & Jerry Dittmer c) Debbie Dubenetzky & Mark Stanifer, d), e), f) & g) Mary Hollingsworth & Randy Braun	U.S. EPA Contact(s):Kevin Pierard, Jack Bajor & Patrick Kuefler	Due Date: See below.
U.S. EPA Role: U.S. EPA 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. U.S. EPA will provide timely review and comment on technical non-rule policy and other documents submitted by IDEM.		

Goal 5: Enforcing environmental laws.
Objective 5.1: Enforce environmental laws.

Funding: State

Implement the state-specific CMS for National Wet Weather Priorities. CAFO inspections will be conducted by the Office of Land Quality (see L-9).

a) IDEM will participate in the review and approval of the LTCPs and consent decree issues in CSO cases under federal lead, including Evansville, Jeffersonville, Gary, Hammond, Mishawaka, South Bend, Elkhart, Anderson, Fort Wayne and Indianapolis.
   Status:

b) IDEM will continue LTCP compliance implementation.
   - Monitoring milestone dates in the LTCP through site visits, and review of documentation.
   - Monitoring compliance with limits (as applicable) through review of submitted monitoring reports.
   - Reviewing periodically the approved LTCPs.
   - Setting meetings (as needed) with communities and their consultants on the status of the implementation of the LTCPs.
   - Confirm, by September 30, 2011, the elimination of CSO outfalls within one mile or less of drinking water intakes.

   Status:

c) There is no set inspection frequency or goal for SSO inspections. Inspections will be scheduled as needed, based on information about overflow occurrences.
   Status:

d) IDEM will administer storm water programs by performing compliance inspections in the following areas: Construction/land disturbance, industrial and municipal separate storm sewer systems (MS4s).
   - Construction/Land Disturbance (327 IAC 15-5): Inspect permitted construction sites and review storm water pollution prevention plans, giving highest importance to those projects for which the agency has received complaints.

   Status:

   - Municipal Separate Storm Sewer System (327 IAC 15-13): Inspections of Phase I MS4s should be conducted on an as needed basis, and before October 2012. By October 2014, conduct an appropriate combination of audits and inspections to determine compliance of Phase II MS4s.

   Status:

   - IDEM will evaluate and develop a process to complete audits of the illicit discharge and post-construction minimum control measures.

   Status:

   - IDEM will evaluate and refine their audit standard operating procedure, and ascertain the time requirements in order to set annual audit goals.

   Status:

   - Industrial Storm Water (327 IAC 15-6): Inspections will include operational facilities as well as facilities that have claimed an exemption, and/or facilities that have been the subject of complaints.

   Status:

e) Evaluate storm water violations and take timely action in accordance with the state's NPDES enforcement management system.
Status:

f) Track storm water compliance monitoring and compliance assurance actions in accordance with established data requirements and reporting timeframes.
Status:

g) Report storm water CMS inspection numbers at mid-year, and at the end of the federal fiscal year. Review plans and commitments prior to the beginning of the federal fiscal year, and at mid-year. Variations from the inspection frequencies and proposed revisions to numerical end-of-year commitments will be justified (i.e. issues related to staffing, funding, etc.).
Status:

Joint State/U.S. EPA R5 Clean Water Act Enforcement and Permitting Work Plan		W-6
Contacts: a) Debbie Dubenetzky & Mark Stanifer b) Paul Higginbotham	U.S. EPA Contacts: James Coleman, Jack Bajor, & Patrick Kuefler	Due Date: Annual Basis.
U.S. EPA Role: Lead, assist, or work share as specified in the annual work plan. R5 will submit a summary report to headquarters on behalf of the state by December 31, 2011 and annually thereafter. Take action to improve performance if IDEM is not meeting performance expectations. Ensure compliance with all federal consent decrees and administrative orders.		

Goal 5: Enforcing environmental laws.
Objective 5.1: Enforce environmental laws.
Funding: Federal/State (Permitting and Enforcement Grant)

U.S. EPA and IDEM, working together, will conduct a CWA annual planning process to identify and discuss national, regional and state priorities versus available resources at both the state and federal levels consistent with CWA Action Plan guidance to be concluded no later than September 30th. The resulting collaborative annual work plans will use all available mechanisms to get work done, such as federal and state work sharing, innovative approaches to monitoring facilities, or addressing violations, etc.

a) Cooperate in developing and implementing the annual Joint State/U.S. EPA R5 CWA Enforcement and Permitting Work Plan.
- Participate in annual planning meetings to develop collaborative annual work plans which may be conducted during the initiation and/or midterm EnPPA evaluations.

Status:

- Participate in routine and regular meetings to discuss progress toward meeting annual permitting and enforcement commitments, and how the state has been performing overall in the NPDES program.

Status:

b) Track priorities established and selected for each FFY. Select priorities for FFY11-13 include focusing on:
- Significant noncompliance (SNC) by major and minor facilities.
- Hands-on operator assistance to mixed ownership and state facilities.
- Reducing SNC violations for late or missing discharge monitoring reports (DMRs).
- Non-SNC violations and state agreed order compliance schedules.
- Reducing sanitary sewer overflows (SSOs).
- Industrial pretreatment.
- Update permit templates as needed.
- Timely permit issuance.
- Expired permits that are 10 years or older are reissued.

- IDEM nutrient monitoring strategy to reduce nitrogen and phosphorous loadings to water bodies.

  Status:

Compliance Monitoring Strategy (CMS) for Core National Pollution Discharge Elimination System (NPDES) Programs		W-7
Contact(s): a) Debbie Dubenetzky & Don Daily; b) Debbie Dubenetzky c) – i) Debbie Dubenetzky & Gary Starks	U.S. EPA Contact(s): James Coleman, Jack Bajor, & Patrick Kuefler	Due Date: a, b, c, d, g, h) Annual Basis e, f, i) Ongoing.
U.S. EPA Role: Provide program assistance.		

Goal 5: Enforcing environmental laws.
Objective 5.1: Enforce environmental laws.
Funding: State

U.S. EPA's national CMS began October 1, 2009 and ends September 30, 2013, with implementation over five annual inspection cycles. Indiana's continuing state-specific CMS for purposes of this EnPPA agreement, runs from October 1, 2011 through September 30, 2013. The goal is to 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) NPDES Compliance Inspections from October 1, 2011 through September 30, 2013:
   - Majors: Conduct compliance evaluation inspections (CEI) or compliance sampling inspections (CSI) at 50% of major NPDES facilities annually. The goal is that 100% of the universe will receive a CEI or CSI inspection every two years in accordance with the national CMS.

     Status:
   - Minors: Municipal and Industrial "IN0" Facilities: Traditional minor NPDES facilities, for purposes of the EnPPA, include individual non-major municipal and industrial facilities beginning with "IN0." Conduct inspections at 50% of "traditional" minor NPDES facilities annually. Half of those inspections are to be CEIs or CSIs. The goal is that 100% of the universe will receive some type of inspection every two years and 100% of the universe will receive a CEI or CSI inspection every four years.

     Status:
   - Minors – Industrial Pretreatment "INP": Conduct CEI at 100% of the universe every two years.

     Status:
   - Minors – State and Federal "IN0" facilities: Conduct CEI at 100% of the universe every two years.

     Status:
   - Major and Minor Mixed Ownership or Semi-Public Facilities: Conduct CEI or CSI at 50% of mixed ownership NPDES facilities annually. The goal is 100% of the universe will receive a CEI or CSI inspection every two years.

     Status:
   - Respond to 100% of complaints.

     Status:

b) Pretreatment Audits:
   - Conduct nine industrial pretreatment audits annually (20% of approved local pretreatment programs).

Status:

c) Quality assurance/quality control (QA/QC):
- Conduct QA/QC reviews of submitted self-monitoring data to evaluate reliability.

Status:

d) Significant non-compliers (SNC):
- Goals are to 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. SNC rate and active exceptions list shall be below 17% on an annual basis.

Status:

- Monitor facilities on the watch list and take action as appropriate.

Status:

e) Evaluate all violations and take timely action in accordance with the state's NPDES enforcement management system.

Status:

f) Enter waste water compliance monitoring and compliance assurance actions into ICIS-NPDES in accordance with established data requirements and reporting timeframes.

Status:

g) Report waste water CMS inspection numbers at mid-year, and at the end of the federal fiscal year. Review plans and commitments prior to the beginning of the federal fiscal year, and at mid-year. Variations from the inspection frequencies and proposed revisions to numerical end-of-year commitments will be justified (i.e. issues related to staffing, funding, new priorities, etc.).

Status:

h) Cooperate in the State Review Framework (SRF) Indiana review by providing data, in-person management, and staff interviews, etc., needed to assess IDEM's performance of compliance monitoring and enforcement activities in accordance with negotiated commitments. Address concerns identified during SRF reviews.

Status:

Safe Drinking Water Act (SDWA)		W-8
Contact(s): a) Pat Carroll & Stacey Jones; b, c, d, e) Pat Carroll & Al Lao f) Pat Carroll & Liz Melvin	U.S. EPA Contact(s): Tom Poy	Due Date: a, b, c, d) Ongoing e) Annually f) Ongoing.
U.S. EPA 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.		

Goal 2: Protect America's waters.
Objective 2.1: Protect human health.
Funding: PPG

a) Implement new federal safe drinking water rules, including re-codifying state rules as outlined in the Annual Resource Deployment Plan (ARDP).

Status:

a) 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:

b) 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:

c) Monitoring and reporting violations - All public water systems (PWSs) with violations will first receive a violation letter. Systems that do not correct the violation after receiving the violation letter will be referred to the Enforcement Section for appropriate actions consistent with agency policies and procedures.
Status:

d) 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:

e) Sanitary surveys at public water supply systems - Complete sanitary surveys at public water systems consistent with SDWA and as outlined in the ARDP.
Status:

Surface Water Quality Monitoring Strategy		W-9
Contact(s):a), b) & d) Marylou Renshaw, Cyndi Wagner, & Lee Bridges c) Andrew Pelloso	U.S. EPA Contact(s): Linda Holst, Mari Nord, & Ed Hammer	Due Date: a)-d) Annually.
U.S. EPA Role: a) Provide assistance in revising monitoring strategy. Review and provide comments on draft and final products. Work with IDEM to implement the strategy and identify resources to address identified gaps. 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. Provide meeting support and travel support as available.		

Goal 2: Protect America's waters.
Objective 2.2: Protect and restore watersheds and aquatic ecosystems.
Funding: PPG

a) Implement the 2011-2019 Water Monitoring Strategy in the 2011 and 2012 monitoring seasons. (U.S. EPA PAM WQ-5) IDEM will use the EnPPA update reporting procedures to provide information on progress, including the number of sites sampled, per basin, major rivers or basins surveyed, number of stations sampled, and types of data collected. IDEM will use the EnPPA update reporting procedures to provide information on progress, including the number of sites sampled, per basin, major rivers or basins surveyed, number of stations sampled, and types of data collected.
Status:

b) Participate in regional monitoring newsletter, webinars and activities as resources allow.
Status:

c) IDEM will by June 2011 establish and then implement a regular schedule to upload water quality data to U.S. EPA R5 national STORET through an updated AIMS database.
Status:

d) Provide separate, timely reports, as required by the grant agreements, on all activities funded by the monitoring initiative funds (specific activities identified in separate amended grant work plans including implementation of the national surveys and monitoring strategy activities).
Status:

Water Quality Standards		W-10
Contact(s): a) Martha Clark Mettler b) Shivi Selvaratnam c) Paul Higginbotham	U.S. EPA Contact(s): Linda Holst, David Pfeifer, Kathy Mayo (anti-deg), Holly Wirick (UAAs), & Brian Thompson (nutrients)	Due Date: Ongoing.
U.S. EPA Role: Participate in the anti-degradation workgroup, use attainability analysis (UAA) discussions, 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).		

Goal 2: Protect America's waters.
Objective 2.2: Protect and restore watersheds and aquatic ecosystems.
Funding: Federal Water Quality Grants

IDEM will work to complete timely WQS revisions.

a) Work with external stakeholders to complete revised anti-degradation implementation rulemaking. IDEM's goal is to have revised rule language primarily adopted by December 30, 2011.
   Status:

b) Implement nutrient criteria development plan (U.S. EPA PAMs WQ-1a and WQ-3a), participate in regional activities (Regional Technical Assistance Group (RTAG) meetings and conference calls), and provide U.S. EPA R5 with revisions to the nutrient criteria development plan by August 1st of each fiscal year (U.S. EPA PAM WQ-1b). IDEM's goal is to have rule language for a WQS for phosphorus in lakes at least preliminarily adopted by June 30, 2012.
   Status:

c) Work collaboratively with U.S. EPA to establish guidance, policies, and procedures on timing of UAAs and components/characteristics of approvable proposed designated use changes for communities that are implementing long term control plans to address CSOs, and seeking or planning to seek CSO limited use designated uses.
   Status:

d) Work collaboratively with U.S. EPA and CSO communities, which are developing UAAs to support adoption of a wet weather limited use designation, to ensure that there is sufficient coordination, to minimize unnecessary duplication of effort, and to ensure the UAAs are consistent with state and federal requirements.
   Status:

e) Initiate scoping and establish a 3-year plan for the next complete triennial review of water quality standards.
   Status:

Homeland Security

Homeland Security		H-1
Contact(s): Max Michael & Laura Steadham	U.S. EPA Contact(s): Roger Kanerva	Due Date: To be established.
U.S. EPA Role: Guidance and federal coordination.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: Federal

Goal 2: Protect America's waters.
Objective 2.1: Protect human health.
Funding: Federal

Assist in the coordination for preventing, protecting against, responding to, and recovering from, natural or man-made 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 assists 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) Continue to review and improve the state's incident debris plan and process as needed. 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:

   - Incorporate new tools such as the Disaster Debris Recovery Network mapping tool and work with U.S. EPA R5 to ensure the information for Indiana faculties is regularly updated.

   Status:

Indiana Water/Wastewater Agency Response Network (INWARN)		II-2
Contact(s): Bruno Pigott, & Sherri Winters	U.S. EPA Contact(s): Roger Kanerva	Due Date: To be established.
U.S. EPA Role: Guidance and federal coordination.		

Goal 2: Protect America's waters.
Objective 2.1: Protect human health.
Funding: Federal

The INWARN is a formalized system of members of the water/wastewater regulated community that have come together to address mutual aid during natural and man-made 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		II-3
Contact(s): Dick Zeiler & Steve Lengerich	U.S. EPA Contact(s): Ralph Dollhopf	Due Date: To be established.
U.S. EPA Role: Guidance and federal coordination.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: Federal

a) Conduct BioWatch monitoring in Indianapolis at eight locations.
Status:

Office of Compliance Support

Reduction of Carbon Footprint and Toxic Chemicals		P-1
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.2: Promote pollution prevention.
Funding: State Grant

a) Encourage local businesses and industries to reduce their carbon footprint through projects implemented by participating in voluntary recognition programs.
Status:

b) Reduce toxic chemicals by promoting waste minimization to businesses in Indiana.
Status:

Greening Facilities and Venues		P-2
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.2: Promote pollution prevention.
Funding: Federal/State

a) Provide technical assistance to community leaders in greening efforts. Primary focus will be working with the City of Indianapolis and athletic organizations as the city hosts the 2012 Super Bowl.
Status:

Unwanted Medicines Disposal Guidance in Indiana		P-3
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.2: Promote pollution prevention.
Funding: Federal

a) Provide guidance for proper disposal of unwanted medicines and develop guidelines for collections conducted by law enforcement, solid waste management districts, pharmacies, municipalities, as well as local drug taskforces.
Status:

Measurement of Solid Waste Diversion and Recycling		P-4
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide technical assistance and lend support to accomplish this goal.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.2: Promote pollution prevention.
Funding: Federal/State

a) Continue to research and consider measurement options that will enable IDEM to accurately report the amount of solid waste that is diverted from disposal or recycled. Provide comment to U.S. EPA on the development of a national measurement methodology for solid waste recycling. Consider participation in pilot or demonstration projects to evaluate measurement systems.
Status:

Demonstration Water Preservation and Pollution Prevention in Indiana--2011 P2 Grant Project		P-5
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.2: Promote pollution prevention.
Funding: PPG

a) Demonstrate measureable reductions in water usage and water pollutants while achieving cost savings at participating entities. These reductions will be achieved by the implementation of a process for identifying water preservation and pollution prevention opportunities at participating industrial facilities.
Status:

Environmental Justice (EJ)		P-6
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Lara Lasky	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		

Goal 3: Cleaning up communities and advancing sustainable development.
Objective 3.3: Promote sustainable and livable communities.
Funding: Federal

a) Framing EJ with sound science (fact-based decision-making) and sound policy (the Constitution's equal protection clause) and aiding all communities to make informed decisions about their environment, health, and well-being. IDEM is in a position to provide leadership in EJ policy development based on IDEM's principle that "All Hoosiers deserve clean air, water, and land."
Status:

b) Reviewing U.S. EPA's "Plan EJ 2014" for advancing environmental justice across the agency—comparing and integrating federal with state initiatives when feasible.
Status:

c) Reviewing grant and cooperative agreement opportunities to better focus IDEM's EJ outreach initiatives to local communicates on targeted issues.
Status:

d) Updating IDEM's website section on EJ.
Status: