Performance Partnership Agreement
for Federal Fiscal Years 2016 - 2019

Between the Vermont Department of Environmental Conservation
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Montpelier, VT 05620
http://dec.vermont.gov

and the

United States Environmental Protection Agency
Region I - New England
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Boston, MA 02109-3912
http://www.epa.gov/aboutepa/epa-region-1-new-england

Prepared by:

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

June 2017
# Table of Contents

Vermont Department of Environmental Conservation Performance Partnership Agreement

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Execution of Agreement</td>
<td>1</td>
</tr>
<tr>
<td>Overview of Performance Partnership Agreement Goals, Roles &amp; Contributions</td>
<td>2</td>
</tr>
<tr>
<td>VT DEC &amp; EPA Region 1 Strategic Plans</td>
<td>4</td>
</tr>
<tr>
<td>Grants Management</td>
<td>9</td>
</tr>
<tr>
<td>APPENDIX A: 2016-2017 Priorities and Commitments List, including Reopener</td>
<td></td>
</tr>
<tr>
<td>APPENDIX B: Vermont DEC 2016-2018 Strategic Plan</td>
<td></td>
</tr>
<tr>
<td>APPENDIX C: USEPA’s 2014-2018 Strategic Plan Summary</td>
<td></td>
</tr>
</tbody>
</table>
Execution of Agreement

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

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

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

Parties to the Agreement

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

Emily Boedecker
Commissioner
This, the 15th day of June, 2017.

Deborah A. Szaro
Acting Regional Administrator
This, the 15th day of June, 2017.
Overview of Performance Partnership Agreement
Goals, Roles & Contributions

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

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

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

Reporting

The PPA/PPG process is designed to reduce the level of EPA oversight and state reporting through the use of mutually agreeable priorities and environmental indicators. DEC already submits a significant amount of information to EPA under national and regional reporting requirements. In addition, DEC will provide EPA with two reports each year to document progress for items on the P&C List: a mid-year report and an end-of-year report. The mid-year report will focus on those activities and performance measures where satisfactory progress has not been made and will include proposed changes needed to address these exceptions. The end-of-year report will be submitted by January following the end of the federal fiscal year (September 30th). This report will summarize progress and discuss any areas where the department has failed to meet the established indicators or is experiencing difficulties in making the progress anticipated. During the year, EPA's Grant Manager and DEC's representatives will communicate at least monthly regarding any areas of concern that have been raised by their respective staffs and/or to discuss issues that could affect the agreement.
Staff level workgroups may be formed, as needed, covering areas of EPA assistance to the state on defined issues.

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

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

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

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

**Schedule of Reporting Dates & Milestones:**

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<tr>
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</thead>
<tbody>
<tr>
<td>June, 2018</td>
<td>Begin discussion with EPA and Stakeholders for the 2016–2019 PPA.</td>
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<td>September, 2018</td>
<td>Submit Draft 2016–2019 PPA to EPA for review.</td>
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<tr>
<td>January, 2019</td>
<td>Submit End-of-Year report for FFY 2018</td>
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<tr>
<td>January, 2020</td>
<td>Submit End-of-Year report for FFY 2019</td>
</tr>
</tbody>
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VT DEC & EPA Region 1 Strategic Plans

VTDEC Strategic Plan (2016-2018)

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

EPA Strategic Plan (2014-2018)

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

Common Themes in Strategic Planning

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

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

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<tr>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>3-year plan (July 2016 – June 2018)</td>
<td>4-year plan (October 2014 – September 2018)</td>
</tr>
<tr>
<td>Goal 1: Reduced public health exposure and risk from air and climate pollution</td>
<td>Goal 1: Addressing Climate Change and Improving Air Quality</td>
</tr>
<tr>
<td>Goal 2: All Vermonters have safe drinking water</td>
<td>Goal 2: Protecting America’s Waters</td>
</tr>
<tr>
<td>Goal 3: Materials are sustainably managed and properties returned to productive use</td>
<td>Goal 3: Cleaning Up Communities and Advancing Sustainable Development</td>
</tr>
<tr>
<td>Goal 4: Protect, maintain, enhance and restore Vermont’s surface waters</td>
<td>Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution</td>
</tr>
<tr>
<td>Goal 5: Manage infrastructure to protect the health and safety of Vermonters</td>
<td>Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance</td>
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<td>Goal 6: Develop and maintain a culture of continuous process improvement</td>
<td>Cross Agency Strategy 4: Embracing EPA as a High-Performing Organization</td>
</tr>
</tbody>
</table>

Environmental Equity/Justice in Vermont

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

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

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

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

The above statements guide the Environmental Equity/Environmental Justice (EE/EJ) work that we do. There is a growing body of evidence that suggests that, in certain instances around the
country, minority and lower income citizens or neighborhoods or communities have faced an inequitable share of the risks associated with environmental hazards. The core issue is the fairness in siting, monitoring, and/or clean-up of facilities and the regulation of activities that represent environmental hazards. The documentation on this issue suggests that for a variety of reasons, not necessarily discriminatory by intent, minority and lower income populations have sometimes borne a disproportionate share of the risks from activities which cause air, water, or soil pollution.

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

**Supporting Disadvantaged Communities**

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

**Key Project Areas:**

1. **EJ 2020** – Work with Region I and the entire Agency to help EPA and VT DEC to integrate environmental justice into everything they do, cultivate strong partnerships to improve on-the-ground results, and chart a path forward for achieving better environmental outcomes and reducing disparities in the nation’s most overburdened communities.

2. **EJSCREEN** – Where appropriate, use EPA’s new environmental justice (EJ) mapping and screening tool called EJSCREEN to help to identify target communities and issues.
3. Title VI and Limited English Proficiency – VT DEC will continue to ensure that it as well as its subrecipients comply with Title VI of the Civil Rights Act of 1964 as well as Executive Order 13166’s Limited English Proficiency Requirements. (See LEP.gov and EPA’s civil rights webpage for additional information).

4. Public Health - Reduce public health exposure and risk from air and climate pollution.

5. Hazardous Waste and Brownfields – Continue to work to ensure fairness in siting, monitoring, and/or clean-up of facilities and the regulation of activities that represent environmental hazards. The documentation on this issue suggests that for a variety of reasons, not necessarily discriminatory by intent, minority and lower income populations have sometimes borne a disproportionate share of the risks from activities which cause air, water, or soil pollution.

Joint Areas for Collaboration

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

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

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

Response to emerging contaminants

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

These new contaminants represent a shift from traditional regulation because instead of coming from one identifiable source, these chemicals are often dispersed through the environment through a variety
of domestic, commercial and industrial uses. Responding to the detection of emerging contaminants in the environment is problematic because often the detection methods, as well as the environmental and health standards, are not completely developed. In many cases there is also a lack of understanding on the background environmental monitoring, identifying sources fate and transport of these contaminants in air and water, and the potential health impacts for humans and other organisms.

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

**Aging drinking water and wastewater infrastructure**

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

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

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

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

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

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

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

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

VTDEC Budget Overview:

VTDEC’s project operating budget for state fiscal year 2017 (SFY2017) is $76.7 million dollars and is comprised of the following revenue sources: $8 million state general fund; $29.7 million special funds (including fees), $32 million federal funds, $7 million interdepartmental funds. The SFY2017 budget increased from $52 million in SFY2016 to $76.7 million in SFY2017 in large part because the State of Vermont now legislatively appropriate the spending authority for the Clean
Water and Drinking Water State Revolving Loan Programs in the VTDEC annual operating base budget. This change in practice stemmed from a VTDEC business process improvement effort which resulted in more efficient and transparent administrative processing as well as more timely availability of future project funds.

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

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

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

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

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

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

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

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

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

The work plan must also be consistent with applicable federal statutes, regulations, circulars, Executive Orders, and USEPA delegations, approvals, or authorizations. The PPA or portion thereof that serves as a grant work plan must meet the same work plan requirements as for any state program grant. The portion(s) of a PPA that serve as a work plan must be clearly identified and distinguished from the rest of the PPA. The regulation at 40 CFR 35.107(c) states:
“An applicant may use a Performance Partnership Agreement or a portion of a Performance Partnership Agreement as the work plan for an environmental program grant if the portions of the Performance Partnership Agreement that serve as all or part of the grant work plan: (1) Are clearly identified and distinguished from other portions of the Performance Partnership Agreement; and (2) Meet the requirements in §35.107(b). A PPG work plan should be the product of joint planning, priority setting and mutual agreement between the state and USEPA. The PPG grant work plan is the result of negotiations between USEPA and state program managers and staff. Successful PPG work plan negotiations rely on a predictable process that fosters prompt resolution of issues, including elevation of issues to senior management levels if necessary. In successful work plan negotiations USEPA and the state will reach a mutual understanding and agreement about what will be accomplished under the agreement.”

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

- **Estimating Budgets:** Consistent with applicable National Program Managers (NPM) Guidance, USEPA should request States to develop and/or submit their work plans and applications based on the previous year’s award amount or the amount derived from the President’s budget, whichever is higher. If amounts based on the President’s budget are not known, negotiations should be based on the previous year’s award amount.

- **Focus Negotiations on New Priorities:** Assuming that the level of funding is not significantly different from the previous year’s grant amount, the primary focus of work plan negotiations should be on new priorities consistent with applicable NPM guidance. Less emphasis should be placed on negotiating recurring activities/commitments where there is a satisfactory record of grant performance.

- **Multi-Year Grant Awards:** For multi-year grant awards, applicants should apply for the total amount of funds expected for the period covered by the award and include any required match in the application. The work plan should also cover the same time period. USEPA will fund the application incrementally as funds become available.

- **Pen and Ink Changes:** If the final amount of funding is lower than the amount applied for, Regions will work with States to identify necessary changes. The State will not need to submit a revised work plan or new application. Regions will document and date through pen and ink changes/email correspondence, agreed-upon revisions to the work plan, budget narrative, and application forms.

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

USEPA Order 5700.7A1 directs program offices to ensure that the work plan contains well-defined outputs and outcomes. For state assistance agreements under 40 CFR 35, Subpart A, program offices may satisfy this requirement by ensuring compliance with 40 CFR 35.107 as stated above. Prior to approving an assistance agreement work plan, program offices must ensure that they can link the work plan to USEPA’s Strategic Plan architecture.
The term “output” in USEPA Order 5700.7A1 means an environmental activity, effort, and/or associated work product related to an environmental goal or objective that will be produced or provided over a period of time or by a specified date. Outputs may be quantitative or qualitative but must be measurable during an assistance agreement funding period.

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

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

Tracking and Evaluating Performance:
VTDEC uses several tools to track performance of our programs. First, VTDEC will submit an End of Year report each year to update EPA on the status of commitments on the P&C List. These reports are specified on Page 4. Second, VTDEC’s new strategic plan includes both environmental indicators as well as key performance measures, this document will be updated annually and shared with EPA. Finally, the State of Vermont General Assembly requires “Performance Based Budgets” be submitted annually. In support of annual state budget proposals, VTDEC develops a package of annual performance measures encompassing efforts from all of our environmental medias. Beginning in SFY2014, VTDEC launched an effort to
improve how the Department tracks and measures the performance of our programs using Results Based Accountability (RBA). This challenges programs to answer the three primary questions used within the RBA framework: (1) How much did we do? (2) How well did we do it? and (3) Is anyone better off? Performance accountability and RBA are now widely throughout VTDEC’s program administration and management; efforts range from including performance measures in our pass-through agreements (grants and contracts), to incorporating RBA into our strategic planning and annual budget development. A full copy of this report for the SFY2017 budget is available at: http://dec.vermont.gov/sites/dec/files/co/documents/DEC-FY17-Performance-Measures.pdf

**Improving Performance through Lean Business Process Improvement:**

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

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

2016-2017 Priorities and Commitments List, including Reopener
<table>
<thead>
<tr>
<th>No.</th>
<th>Objective</th>
<th>Fiscal Year Plan</th>
<th>FY 2016 PPA Priorities &amp; Commitments List</th>
<th>FY 2017 PPA Priorities &amp; Commitments List</th>
<th>Approval</th>
<th>Initials, Date</th>
<th>VT DEC</th>
<th>EPA</th>
<th>VT DEC Contents</th>
<th>EPA Contents</th>
<th>ROM-Specific Responder</th>
<th>Approval Date, Initials, Date</th>
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<tbody>
<tr>
<td>1</td>
<td>GHG Actions in the Industrial Sector</td>
<td>Objective 1.4: Addressing Climate Change and Improving Air Quality</td>
<td>GHG Actions in the Industrial Sector</td>
<td>Objective 1.4: Addressing Climate Change and Improving Air Quality</td>
<td>Manager: Anne Arnold -</td>
<td>HH, 9/22/15 DBC 9/25/15</td>
<td>Megan O'Toole 249-8083</td>
<td>Manager: Cynthia Greene - 6184, Shutsu McWilliams - 6184, Technical Advisor - 1637</td>
<td>EPA website</td>
<td>VT 622.XXXXXXX</td>
<td>EPA website</td>
<td>VT 627.818.XXXXXX</td>
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<tr>
<td>2</td>
<td>Participate in meeting with EPA to address issues related to reducing GHG emissions.</td>
<td></td>
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<td></td>
<td></td>
<td>HH, 8/28/15 DBC 8/29/15</td>
<td>Jennifer O'Sullivan 249-9063</td>
<td>Manager: Cynthia Greene - 6184, Shutsu McWilliams - 6184, Technical Advisor - 1637</td>
<td>EPA website</td>
<td>VT 622.XXXXXXX</td>
<td>EPA website</td>
<td>VT 627.818.XXXXXX</td>
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<td>3</td>
<td>Work with EPA to draft annual updates to 2014 SIP Plan and target date for updated plan is</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>DE, 9/10/2015 DBC 9/15/15</td>
<td>Doug Elliott 377-0569</td>
<td>Manager: Cynthia Greene - 6184, Shutsu McWilliams - 6184</td>
<td>VT 622.XXXXXXX</td>
<td>EPA website</td>
<td>VT 622.XXXXXXX</td>
<td>HH, 11/24/16 DBC - 11/21/16</td>
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<td>VT DEC Contents</td>
<td>EPA Contents</td>
<td>Rom-Specific Responder</td>
<td>FY2018 Responder Comments</td>
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<td>15</td>
<td>submit infrastructure SIP for the 2012 PM2.5 NAAQS, SIP and/or guidance for the second</td>
<td>submit infrastructure SIP for the one hour SO2 standard. (FY'16-17 OAR NPM Guidance: 2.1.4 SIPs, Activity 2.)</td>
<td>HH, 9/22/15</td>
<td>OCR</td>
<td>Vermont LEAP 269-262</td>
<td>EPA</td>
<td>Vermont LEAP 269-262</td>
<td>Manager: Ida McDonnell</td>
<td>9/22/15</td>
<td>OCR</td>
<td>9/22/15</td>
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<td>16</td>
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<td>17</td>
<td>If not completed in FY'15, submit infrastructure SIP for the one hour SO2 standard. (FY'16-17 OAR NPM Guidance: 2.1.4 SIPs, Activity 2.)</td>
<td>If not completed in FY'15, submit the Regional Haze Interim Progress Report SIP revision due June 1, 2016. (FY'16-17 OAR NPM Guidance: 2.2 Regional Haze, Activity 3.)</td>
<td>HH, 9/22/15</td>
<td>OCR</td>
<td>Vermont LEAP 269-262</td>
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<td>Manager: Ida McDonnell</td>
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<td>OCR</td>
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<td>18</td>
<td>If not completed in FY'15, submit infrastructure SIP for the one hour NO2 standard. (FY'16-17 OAR NPM Guidance: 2.1.4 SIPs, Activity 2.)</td>
<td>If not completed in FY'15, submit regional haze SIP for the second planning period. (FY'16-17 OAR NPM Guidance: 2.1.4 SIPs, Activity 2.)</td>
<td>HH, 9/22/15</td>
<td>OCR</td>
<td>Vermont LEAP 269-262</td>
<td>EPA</td>
<td>Vermont LEAP 269-262</td>
<td>VT should respond to EPA's 120 day proposed 602 designation letter, as appropriate.</td>
<td>9/22/15</td>
<td>OCR</td>
<td>9/22/15</td>
<td>OCR</td>
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<td>19</td>
<td>Regional Haze regional haze rules revisions and/or guidance for the second planning period. (FY'16-17 OAR NPM Guidance: 2.2 Regional Haze, Activity 4.)</td>
<td>Title V / NSR Permits Title V / NSR Permits</td>
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<td>20</td>
<td>During FY'16, ensure that 100 percent of new Title V operating permits are issued within 12 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activity 4)</td>
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<td>DE, 9/10/15</td>
<td>DBC</td>
<td>Doug Dahl - 1657</td>
<td>EPA</td>
<td>DE, 9/10/15</td>
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<td>Doug Dahl - 1657</td>
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<td>21</td>
<td>During the PA planning period 2016, continue to improve permit application processing times for major Title V title V permits. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activity 5)</td>
<td>During FY'17, ensure that 100 percent of new Title V operating permits are issued within 12 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activity 4)</td>
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<td>Doug Dahl - 1657</td>
<td>EPA</td>
<td>DE, 9/10/15</td>
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<td>Review all major Title V permit applications within 12 months of receiving a complete permit application. Provide necessary data to document the goal every six months. (FY'16-17 OAR NPM Guidance: 2.3.4 Title V and NSR, Activity 4)</td>
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<td>9/10/15</td>
<td>DBC</td>
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GOAL 1: ADDRESSING CLIMATE CHANGE AND IMPROVING AIR QUALITY

Air Monitoring: Submit to EPA by July 1, 2016 the annual air monitoring network plan (40 CFR §101). State Plan should be made available for public and EPA review by May 1, 2016 on the internet. The plan should include ensuring monitoring networks are consistent with the requirement of NAAQS, SO2, CO, lead and ozone NAAQS, in particular. (OAQPS M01F16-17 OAR NPM Guidance, 2.4 Ambient Air Monitoring, and 2016 Ambient Monitoring Appendix found on AMTIC. www.epa.gov/ttn/amtic/files/policy/2016NPMGuidanceMonitoringAppendix.pdf)

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Air Monitoring Network: Operate EPA-approved networks (SLAMS, PAMS, PM), enter the air monitoring, precision and accuracy data into AQDS within 60 days of the data collection. (OAQPS M06) and submit the Annual Air Quality Data Certification by May 1, 2016 (40 CFR §101). (OAQPS M08) Air Monitoring Network: Operate EPA-approved network (SLAMS, PAMS, PM), enter the air monitoring, precision and accuracy data into AQDS within 60 days of data collection. (OAQPS M06) and submit the Annual Air Quality Data Certification by May 1, 2017 (40 CFR §101). (OAQPS M08)

Quality Assurance: Ensure all approved QAPPs are reviewed by November 1, 2015, and perform the testing to EPA. Major changes will require a QAPP revision. (FY'16-17 OAR NPM Guidance, and 2016 Ambient Monitoring Appendix found on AMTIC.)

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Quality assurance: Ensure adequate, independent QA audits of NAAQS monitors or participate in NPAP and PEP QA programs. (OAQPS M01F16-17 OAR NPM Guidance, 2.4.4 Ambient Air Monitoring, and 2016 Ambient Monitoring Appendix found on AMTIC.)

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GOAL 1: ADDRESSING CLIMATE CHANGE AND IMPROVING AIR QUALITY

No specific PPA related action for the State

Objective 1.3: Restore the Ozone Layer

No specific PPA related action for the State

Objective 1.4: Reduce Unnecessary Exposure to Radiation

No specific PPA related action for the State

Support EPA’s efforts to produce an accurate National Emissions Inventory (NEI) for Hazardous Air Pollutants (HAPs). This includes collecting HAP data from sources and submitting this data to EPA by January 15, 2017. By Dec 31, 2016, submit a brief summary of implementation activities completed.

In FY 2016, EPA Region 1 will work with all six New England states to discuss potential partial and/or temporary delegation options of the wood heater NSPS rules, outreach to retailers on EPA’s new and amended wood heater requirements, and on potential Joint Public Rulemaking to develop a model rule for New England.

During FY 2016, EPA Region 1 will work with all six New England states to discuss potential partial and/or temporary delegation options of the wood heater NSPS rules, outreach to retailers on EPA’s new and amended wood heater requirements, and on potential Joint Public Rulemaking to develop a model rule for New England.

During FY 2016, submit a negative declaration that no landfills exist in VT that are subject to the EGs.

Pursuant to the final Emission Guidelines for Municipal Solid Waste Incinerators (EGs) for Hazardous Air Pollutants (HAPs), the EGs includes major sources and area sources. In addition, review and comment on RTR review (RTR) program to determine whether the sources identified are covered by the standard.

The date by which VT is asking EPA to submit a summary of implementation activities completed is being revised to September 30, 2016. By Dec 31, 2016, submit a brief summary of implementation activities completed. (FY'16-17 OAR NPM Guidance: 2.5.4 Air Toxics, Activity 3.)

During FY 2016, submit a draft state plan for EPA review by May 2017.
### GOAL 2: PROTECTING AMERICA'S WATERS

#### 508b.

<table>
<thead>
<tr>
<th>No.</th>
<th>Issue</th>
<th>Priority</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Drinking Water Protection</td>
<td>Priority</td>
<td>Continue to support implementation of local source water protection programs and where appropriate, continue to integrate source water protection implementation into other programs appropriate (e.g., EIP, stormwater). (SP-6) State expects to begin increasing technical assistance, outreach, and education programs to water resources professionals in the coming years to improve utilizing the multi-barrier approaches to safe drinking water.</td>
</tr>
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</tr>
<tr>
<td>3</td>
<td>Drinking Water Protection</td>
<td>Priority</td>
<td>Work to achieve target of 90% of the population served by CWs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 1a) Work to achieve target of 90% of the population served by CWs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 1a) Work to achieve target of 90% of the population served by CWs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 1a) Work to achieve target of 90% of the population served by CWs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 1a) Work to achieve target of 90% of the population served by CWs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 1a) Work to achieve target of 90% of the population served by CWs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 1a)</td>
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<td>4</td>
<td>Drinking Water Protection</td>
<td>Priority</td>
<td>Four year surveys for all groundwater CWS (and receive Q2) during which CWs provide drinking water that meets all applicable health-based drinking water standards. (SP-2) Four year surveys for all groundwater CWS (and receive Q2) during which CWs provide drinking water that meets all applicable health-based drinking water standards. (SP-2) Four year surveys for all groundwater CWS (and receive Q2) during which CWs provide drinking water that meets all applicable health-based drinking water standards. (SP-2) Four year surveys for all groundwater CWS (and receive Q2) during which CWs provide drinking water that meets all applicable health-based drinking water standards. (SP-2) Four year surveys for all groundwater CWS (and receive Q2) during which CWs provide drinking water that meets all applicable health-based drinking water standards. (SP-2) Four year surveys for all groundwater CWS (and receive Q2) during which CWs provide drinking water that meets all applicable health-based drinking water standards. (SP-2)</td>
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<tr>
<td>5</td>
<td>Source Water Protection</td>
<td>Priority</td>
<td>Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primary approval. Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primary approval. Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primary approval. Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primary approval. Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primary approval. Groundwater Rule: Implement GWR and work with Region to make any changes necessary to obtain final primary approval.</td>
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<td>6</td>
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<td>Sanitary Survey: All CWs have undergone a sanitary survey within 3 years of the last survey. Three year cycle for surveys conducted at CWs will be measured based on the period 1/1/11 through 12/31/13; ensure 100% of CWs served by surface water/GSEW are surveyed in this time period. For Groundwater Rule, complete a survey for all groundwater CWs on a three year cycle and all N GRNWs on a five year cycle (i.e., “35 N GRNW/year”). Report all surveys to SDW4a.</td>
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Submit and review UIC Rule rewrite in VT DW & GW.

Participate in or coordinate with EPA Office of Water's National Aquatic Resource relevant regional meetings/conferences (e.g., NEAEB).


Provide schedule and progress report for multi-year surveys.

Conduct statewide probabilistic surveys and assessment of at least one water resource at least one designated use with applicable water quality standard.

Provide schedule and progress report for multi-year surveys.


Participate in the Environment Network grant.

Continue implementing comprehensive water monitoring strategy covering lakes, rivers, estuaries and wetlands.

Conduct statewide probabilistic surveys and assessment of at least one water resource at least one designated use with applicable water quality standard.

Provide schedule and progress report for multi-year surveys.


Participate in New England-wide projects and activities, and attend relevant regional meetings/conferences (e.g., NEACO).

Participate in or coordinate with EPA Office of Water's National Aquatic Resource Surveys (NARS) and submit workplan reflecting level of participation.

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Participate in Region 1/State/NEIWPCC TMDL efforts to improve environmental effectiveness of the TMDL program.

Submit a list of water bodies and HUC-12 watersheds to EPA by 9/30/15 that the state is working to fully or partially restore by 1/30/2016. (SP-10, SP-11, SP-12)

In these priority water bodies and watersheds, work to leverage existing tools and resources such as the state’s TMDL, nonpoint source, water quality, permit, SRF, and source water assessment programs to concentrate implementation efforts and to measure improvements. Report progress on restoring these priority waters and watersheds by 1/30/2016. (SP-10, SP-11, SP-12)

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Success Stories: Submit success stories for waterbodies that have been fully or partially deleted in previous years, and that show improvement in water quality or demonstrate ecological restoration (MQ-10). To do this, identify water bodies that were recently partially or fully deleted, or that demonstrate water quality or habitat improvement, and investigate whether local, state, federal or Indian NPDES mitigation occurred that might make these waterbodies a candidate for a NPS Success Story. Using EPA's guidance (http://water.epa.gov/powaste/npd/success319/inforfmt.html), prepare and submit to EPA a success story for each water body by June 1st. See http://water.epa.gov/powaste/npd/success319/330/ for examples of success stories and other information.

GRTS: Within 90 days of receipt of a categorical grant or receipt of final 319 funding under a PPG award, enter into the Grants Reporting Tracking System (GRTS) all 319 grant mandatory data elements except for best management practices data and load reduction model and data. By February 15th, complete annual GRTS reporting by entering all remaining mandatory BMP and load reduction data (if applicable). Provide timely review of national GRTS reports and national GRTS program audits in accordance with the CWA and following the current Nonpoint Source Program and Grants Guidelines. Report annually on progress made in implementing the state's NPS Management Program, including a summary of major accomplishments and completed milestones, a description of 319-funded statewide programs and completed 319-funded watershed projects, a list of active 319 projects with expected completion date, a brief summary of water quality improvements (e.g. restoration of impaired waters or other notable environmental results) and NPS pollutant load reductions (total phosphorus, nitrogen, and sediment reductions for the state, from the previous February's GRTS reporting). Where information is not yet available on load reductions and water quality improvement where implementation is underway, surrogate measures of environmental progress should be used.

Annual Report: Submit an annual report that is responsive to Regional guidance and that describes 319-related work, including how the state is organized to implement the NPS management plan and achieve its broad goals (e.g., staffing, training, technology transfer, financial assistance, public outreach, etc.), as well as proposed projects and activities for the year consistent with management plan priorities and milestones.

Progress and Performance Review: EPA will use information provided by the state (annual report, workplan, GRTS entry, success stories) to determine whether the State has made satisfactory progress in implementing its NPS Management Program in accordance with CWA Section 319(6)(B). If appropriate, EPA will request additional information to assist with the determination. EPA will complete an annual checklist on Progress and Performance and document its findings.

Action Items to be implemented: Ensure Vermont permits contain citations to the current 2010 EPA WET test methods and ensure a sufficient amount of WET monitoring data is required to assess WET reasonable potential, and to establish limits if necessary. If these action items have not been completed in FY2015, complete documentation in FY2016. (Action items VT-11-02 and BB, and in recent draft QPR)

Action Items to be implemented: Ensure Vermont permits contain citations to the current 2012 EPA WET test methods and ensure a sufficient amount of WET monitoring data is required to assess WET reasonable potential, and to establish limits if necessary. If these action items have not been completed in FY2015, complete documentation in FY2016. (Action items VT-11-02 and BB, and in recent draft QPR)

Contact name changed to Mary Borg
The State will continue its best efforts to reduce the EFDES building backlog toward a level of not greater than 10% (the national goal) by completing permits for EFDES permits over the next 3 years, such that the backlog is reduced each of these years from FY12 to FY15, FY16, and FY17.

The State will maintain the prepermit permit backlog to a level of no greater than 10%. (WQ-14)

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The state will inspect and sample Significant Industrial Users (SIUs) at 100% coverage annually.

Continuous to implement delineated EFDES storm water programs, including Phase II M4 permits, construction permits and industrial permits. (WQ-18)

Action Items to be implemented: Ensure the permit limits are derived to meet the Phosphorous and Nitrogen Criteria in current State Surface WQSs when the permits are renewed. (40 CFR 122.44(d)) (VT-11-03).

Action Items to be implemented: Ensure that permit reference applicable effluent limit guidelines (ELGs) for industrial permits. (40 CFR 124.56) If this action item has not been completed in FY2015, or FY2016, complete documentation in FY2016. (WQ-13b)

Action Items to be implemented: Ensure the permit fact sheets confirm and demonstrate consideration of water quality-based effluent limitation for permit limit derivation and present the selection of the more stringent effluent limitation. (40 CFR 122.44(d)) If this action item has not been completed in FY2015, complete documentation in FY2016. (WQ-13b)

Action Items to be implemented: Ensure that permits are reissued. (40 CFR 122.44(d)) If this action item has not been completed in FY2015, complete documentation in FY2016. (VT-11-01)

The State will make every effort to issue the targeted number of priority permits for FY2016 which will be established in the last months of FY2015. There are likely to be about 31 priority permits in VT for FY2016. (WQ-16a)

Phosphorus and Nitrogen Criteria in current State Surface WQSs when the permits are renewed. (40 CFR 122.44(d)) (VT-11-03).

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Action Items to be implemented: Include the basis for technology-based permit requirements in fact sheets or the administrative record, including discussion of applicable, industry-specific ELG (and subpart) or, in the absence of an ELG, the basis for limitations based on best professional judgment. (from recent draft PQR)

Action Items to be implemented: Ensure the permit fact sheets are consistent with regulatory requirements that specifically describe the basis for permit requirements and decisions including (1) decisions of whether nutrients discharged have a reasonable potential to cause or contribute to an exceedance of Water Quality Standards and (2) the calculations for nutrient limits. If this action item has not been completed in FY2016, complete documentation in FY2017.

The State will implement delegated EFDES storm water programs, including Phase II M4 permits, construction permits and industrial permits. (WQ-18)

Action Items to be implemented: Include the basis for technology-based permit requirements in fact sheets or the administrative record, including discussion of applicable, industry-specific ELG (and subpart) or, in the absence of an ELG, the basis for limitations based on best professional judgment. (from recent draft PQR)

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The State will maintain the prepermit permit backlog to a level of no greater than 10%. (WQ-14)

The state will inspect and sample Significant Industrial Users (SIUs) at 100% coverage annually.

Continuous to implement delineated EFDES storm water programs, including Phase II M4 permits, construction permits and industrial permits. (WQ-18)
Incorporating on your state agency website (or the RI EPA NPDES Permitting website) state issued PRQs, Draft PRQs, Fact sheets, Q&As, the covered GP’s permits, the dates of authorization for each GP permittee, and possibly the NQs for each GP.

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Objective 3.2: Preserve Land
Continue to inspect federally regulated UST facilities at least once every 3 years. (ACS Code: ST6 / 3.2)

Objective 3.3: Restore Land
Draft USTCA Program Approval
Revise USTCA Program Approval
- Initials, Date

New, 0.5% over rate of previous year. (ACS Code: ST6 / 3.2)

Improve UST Operational Compliance: (b) continue to improve operational inspections to determine significant operational compliance.

Post the annual USTCA public record which will include: the number, sources, and causes of underground storage tank releases; the record of compliance by UST owner/operators, and by state program agencies responsible for the USTs.

Continue with implementation of operator training program.

VT will initiate rulemaking to adopt portions of the solvent wipes and DSW rules and to complete other rule maintenance.

As resources allow, in coordination with EPA New England, identify any ongoing EJ issues and implement new activities that will advance environmental justice within state programs. And, continue to participate on the state EJ quarterly calls.

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<th>Emergency Preparedness</th>
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<th>Senior Program Manager: Carol Tucker</th>
<th>10/10</th>
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<tbody>
<tr>
<td>12</td>
<td>Achieve Contaminated Ground Water Migration Under Control at zero (0) facilities. (CA1)</td>
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<td>TBD 12/5/15</td>
</tr>
<tr>
<td>13</td>
<td>Achieve Human Exposures Controlled Under Current Conditions at zero (0) facilities. (CA2)</td>
<td>Achieve Human Exposures Controlled Under Current Conditions at zero (0) facilities. (CA2)</td>
<td>TBD 12/5/15</td>
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<tr>
<td>14</td>
<td>Achieve site-wide Contingency site selection at zero (0) facilities.</td>
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<tr>
<td>15</td>
<td>Achieve corrective action complete at zero (0) facilities.</td>
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<td>TBD 12/5/15</td>
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<tr>
<td>16</td>
<td>Assessment of financial assurance current status for all new remedies.</td>
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<td>TBD 12/5/15</td>
</tr>
<tr>
<td>17</td>
<td>Verify adequacy of financial assurance instrument for all new remedies.</td>
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<td>TBD 12/5/15</td>
</tr>
<tr>
<td>18</td>
<td>RCRA Training &amp; Meetings</td>
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<tr>
<td>19</td>
<td>Attend EPA sponsored regional and national RCRA meetings and training as appropriate.</td>
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<td>22</td>
<td>No specific PPA related action for this topic.</td>
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</tr>
</tbody>
</table>
No specific PPA related action for the State

Objective 4.2: Promote Pollution Prevention

As a follow up to the June OES planning meeting, participate in the fall New England Pollution Prevention and Assistance Forum.

LM, 9/4/2015

Lynn Metcalf - 522-0469
Toni D’Avanzo: 8-1801
GOAL 5: PROTECTING HUMAN HEALTH AND THE ENVIRONMENT BY ENFORCING LAWS AND ASSURING COMPLIANCE

GOAL 5: PROTECTING HUMAN HEALTH AND THE ENVIRONMENT BY ENFORCING LAWS AND ASSURING COMPLIANCE

1. All annual compliance monitoring reports, descriptions of the state’s assistance and innovative programs, including projections for priority activities.
3. Serve as EPA contact for development of any plans for the state’s assistance and innovative programs.
4. At end of year 2016, provide a discussion on any plans that might have developed under item 117, or provide a negative declaration.
5. Submit version FY17 Alternative Compliance Monitoring Strategy. This is only required if the state is seeking flexibility under an alternative CMS plan.
6. By September 30, 2017 report on progress in addressing any recommendations made in the most recent OECA National Program Manager’s Guidance Addendum and the CAA, RCRA and CWA containing descriptions of the state’s compliance program accomplishments.

LAWS AND ASSURING COMPLIANCE

GOAL 5: PROTECTING HUMAN HEALTH AND THE ENVIRONMENT BY ENFORCING LAWS AND ASSURING COMPLIANCE

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1. Review the State QMP and summarize changes made to the QMP in Part B of the Annual Quality System Status Report.

2. A process for jointly evaluating and reporting progress and accomplishments under the workplan must be developed and described in the workplan. The process must be based on a negotiated schedule.

3. Continue to implement the State Quality Management Plan (QMP) and Maintain accreditation for the DEC laboratory and follow up promptly on any action items resulting from NELAP assessments of the laboratory.

4. An annual written progress report must be submitted within 90 days after the end of the annual grant period. (40CFR35.115).

5. The report will be submitted within 90 days of the end of the Federal Fiscal Year documenting progress, activities, and status of the organization’s quality system.

6. An annual written progress report must be submitted within 90 days after the end of the Federal Fiscal Year to the EPA NE Quality Assurance Unit.

7. Continue to implement the State Quality Management Plan (QMP) and maintain the Annual Quality System Status Report to the EPA NE Quality Assurance Unit documenting progress, activities, and status of the organization’s quality system.

8. A process for jointly evaluating and reporting progress and accomplishments under the workplan must be developed and described in the workplan. The process must be based on a negotiated schedule.

9. A process for jointly evaluating and reporting progress and accomplishments under the workplan must be developed and described in the workplan. The process must be based on a negotiated schedule.

10. An annual written progress report must be submitted within 90 days after the end of the annual grant period. (40CFR35.115).

11. The report will be submitted within 90 days of the end of the Federal Fiscal Year documenting progress, activities, and status of the organization’s quality system.

12. An annual written progress report must be submitted within 90 days after the end of the Federal Fiscal Year to the EPA NE Quality Assurance Unit.

13. Continue to implement the State Quality Management Plan (QMP) and Maintain accreditation for the DEC laboratory and follow up promptly on any action items resulting from NELAP assessments of the laboratory.

14. An annual written progress report must be submitted within 90 days after the end of the Federal Fiscal Year to the EPA NE Quality Assurance Unit.

15. Continue to implement the State Quality Management Plan (QMP) and Maintain accreditation for the DEC laboratory and follow up promptly on any action items resulting from NELAP assessments of the laboratory.

16. An annual written progress report must be submitted within 90 days after the end of the Federal Fiscal Year to the EPA NE Quality Assurance Unit.

17. Continue to implement the State Quality Management Plan (QMP) and Maintain accreditation for the DEC laboratory and follow up promptly on any action items resulting from NELAP assessments of the laboratory.

18. An annual written progress report must be submitted within 90 days after the end of the Federal Fiscal Year to the EPA NE Quality Assurance Unit.

19. Continue to implement the State Quality Management Plan (QMP) and Maintain accreditation for the DEC laboratory and follow up promptly on any action items resulting from NELAP assessments of the laboratory.

20. An annual written progress report must be submitted within 90 days after the end of the Federal Fiscal Year to the EPA NE Quality Assurance Unit.
# Table of Contents

Department Mission ..................................................................................................................................... 1

Department Strategic Planning Process ....................................................................................................... 1

Population-Based Outcomes & Indicators .................................................................................................... 2

Clean Air .................................................................................................................................................... 2

Clean Water .............................................................................................................................................. 2

Healthy and Safe Communities ................................................................................................................. 2

Efficient and Effective Government .......................................................................................................... 2

Department of Environmental Conservation Goals (2016 -2018) ........................................................... 3

Goal 1: Reduced public health exposure and risk from air and climate pollution........................ 3

Goal 2: All Vermonters have safe drinking water ................................................................................. 3

Goal 3: Materials are sustainably managed and properties returned to productive use .................... 4

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

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

Goal 6: Develop and maintain a culture of continuous process improvement ................................. 5
Department Mission
To preserve, enhance, restore, and conserve Vermont's natural resources, and protect human health for the benefit of this and future generations.

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

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

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

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

**Efficient and Effective Government**
- Number of Lean (process improvement) events successfully completed across state government
Department of Environmental Conservation Goals (2016 - 2018)

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

A. **Strategy:** Support clean and efficient wood burning

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

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

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

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

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

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

Goal 2: All Vermonters have safe drinking water

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

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

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

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

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

   *Performance Measure 2:* Cumulative number of groundwater samples collected analyzed for arsenic, radionuclides, nitrates, manganese, and other emerging contaminants.
Performance Measure 3: Annual percentage of wastewater systems permitted by the On-site Program since 1989 that have not failed.

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

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

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

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

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

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

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

Performance Measure 3: Amount of funds leveraged for Brownfields redevelopment

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

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

Performance Measure 1: Number of acres protected

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

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

Performance Measure 1: Percent wastewater treatment facility permit applications backlogged

Performance Measure 2: Number of wastewater compliance and inspection-related site visits
**Performance Measure 3:** Number of stormwater compliance and inspection-related site visits

**Performance Measure 4:** Number of entities receiving technical assistance

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

   **Performance Measure 1:** Number of projects with enhanced protection

   **Performance Measure 2:** Number of river enhancement projects

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

   **Performance Measure 1:** Funding awarded for priority projects

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

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

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

A. **Strategy:** Reduce potential for dam failure risks

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

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

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

A. **Strategy:** Increase number of electronic transactions

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

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

B. **Strategy:** Implement Permit Process Improvement plan to increase transparency, provide opportunities for public input earlier in decision making, timely decisions
C. **Strategy:** Develop and apply diversified portfolio of Lean tools and evaluate effectiveness.

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

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

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

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

USEPA’s 2014-2018 Strategic Plan

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

Goal 1: Addressing Climate Change and Improving Air Quality

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

Objectives:

- **Address Climate Change.** Minimize the threats posed by climate change by reducing greenhouse gas emissions and taking actions that help to protect human health and help communities and ecosystems become more resilient to the effects of climate change

- **Improve Air Quality.** Achieve and maintain health and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants

- **Restore the Ozone Layer.** Restore and protect the earth’s stratospheric ozone layer and protect the public from harmful effects of ultraviolet (UV) radiation

- **Reduce Unnecessary Exposure to Radiation.** Minimize releases of radioactive material and be prepared to minimize exposure through response and recovery actions should unavoidable releases occur.

Goal 2: Protecting America’s Waters

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

- **Protect Human Health.** Achieve and maintain standards and guidelines protective of human health in drinking water supplies, fish, shellfish, and recreational waters, and protect and sustainably manage drinking water resources.

- **Protect and Restore Watersheds and Aquatic Ecosystems.** Protect, restore, and sustain the quality of rivers, lakes, streams, and wetlands on a watershed basis, and sustainably manage and protect coastal and ocean resources and ecosystems.

Goal 3: Cleaning Up Communities and Advancing Sustainable Development

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

Objectives:

- **Promote Sustainable and Livable Communities.** Support sustainable, resilient, and livable communities by working with local, state, tribal, and federal partners to promote smart growth, emergency preparedness and recovery planning, redevelopment, and the equitable distribution of environmental benefits.

- **Preserve Land.** Conserve resources and prevent land contamination by reducing waste generation and toxicity, promoting proper management of waste and petroleum products, and increasing sustainable materials management.

- **Restore Land.** Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites for reuse.

- **Strengthen Human Health and Environmental Protection in Indian Country.** Directly implement federal environmental programs in Indian country and support federal program delegation to tribes. Provide tribes with technical assistance and support capacity development for the establishment and implementation of sustainable environmental programs in Indian country.

Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution

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

Objectives:

- **Ensure Chemical Safety.** Reduce the risk and increase the safety of chemicals that enter our products, our environment, and our bodies.
- **Promote Pollution Prevention.** Conserve and protect natural resources by promoting pollution prevention and the adoption of other sustainability practices by companies, communities, governmental organizations, and individuals.

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

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

Objective:

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

**USEPA Cross-Cutting Fundamental Strategies**

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

These cross cutting strategies are:

**Working Toward a Sustainable Future**

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

**Working to Make a Visible Difference in Communities**

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

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

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

Embracing USEPA as a High-Performing Organization

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