

# **Performance Partnership Agreement for Federal Fiscal Years 2020 - 2023**

## **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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**Prepared by:**

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

**May 2020**

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## EXECUTION OF THE AGREEMENT

This Performance Partnership Agreement (Agreement or PPA) between the Vermont Department of Environmental Conservation (VT DEC) and the U.S. Environmental Protection Agency, Region I - New England (EPANE), covers the time period from October 1, 2019 to September 30, 2023. 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 Vermont Department of Environmental Conservation and the EPANE for federal fiscal years 2020 - 2023. The Agreement, including the Areas for Collaboration, will be reviewed annually (as will the associated EPANE Priorities & Commitments Lists and Vermont Department of Environmental Conservation Comprehensive Work Plans), and modified as necessary to ensure that it remains relevant and up-to-date.

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Peter Walke  
Commissioner  
VT Department of Environmental Conservation  
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Dennis Deziel  
Regional Administrator  
U.S. EPA Region I - New England  
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Boston MA 02109-3912

This, the \_\_\_ day of May, 2020.

This, the \_\_\_ day of May, 2020.

## **II. OVERVIEW**

### **A. Guiding Principles**

The Vermont Department of Environmental Conservation (VT DEC) has entered into Performance Partnership Agreements (PPA) with the Environmental Protection Agency, Region I - New England (EPANE) 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 VT DEC'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 including for federal fiscal years (FFY) 2020, 2021, 2022 and 2023. 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 being renegotiated annually to being renegotiated every two years with the opportunity to reopen during the second year for any necessary adjustments. The most recent P&C List for FFY2020 and FFY2021 is included in Appendix A.

### **B. Roles/Contributions of Each Agency**

As in past agreements, the concept that strong environmental protection relies on effective State, Tribal and Local partnerships remains especially relevant today. Good government, as well as the reality of scarce resources, requires that VT DEC and EPANE work in concert with local governments, and our sister states and federal agencies that constitute our country's environmental protection enterprise, to ensure the efficiency, efficacy, and coordination of our overlapping and complementary efforts. Work must be shared, roles must be refined, and stronger, more efficient and cost-effective partnerships must be built to ensure our continued joint success. Under this agreement, Vermont Department of Environmental Conservation and EPA New England will collaborate to achieve shared initiatives and priorities. This will be accomplished through regular communication between technical staff on specific issues and VT DEC and EPANE.

### **C. Strategic Investment/Disinvestment Process**

In previous agreements, EPANE Senior Leadership and the Commissioners of the New England state environmental agencies periodically entered into specific negotiations around high-priorities and major shifts in commitments. To date, the strategic investment/disinvestment work has given state partners the flexibility to identify priority investments and disinvestments to support the most critical environmental and public health priorities— operationalizing NEPPS in a new way. In FY2016, all states elected not to have a separate process. Instead, any necessary disinvestment will be addressed and documented in their respective two-year P&C Lists going forward, and any related comprehensive work plans.

While the development of the FFY 2020-2023 PPA did not entail a separate strategic investment/disinvestment exercise, this general approach is well embedded in the process for identifying

potential Areas for Collaboration (see Section V), as well as the process for negotiating the two-year P&C Lists and any comprehensive work plans generated.

### III. VT DEC and EPANE - Strategic Priorities

In this section, summarized versions of VT DEC and EPANE Strategic Priorities and Plans are provided. More detailed versions of the current VT DEC and EPA Strategic Plans are presented in the attached Appendices and identify the current environmental goals of both agencies.

#### A. VT DEC's Strategic Priorities

In 2018, VT DEC established [Mission Driven Priorities](#) that focus on five key areas: Water, Land, Air, Communities and Customers. These priorities guide the DEC in the execution of our regulatory, assistance and outreach programs. Strategies and reporting on our progress on these priorities is included in DEC's annual [Environmental Indicators and Trends Report](#).

##### **Our Water**

- Ensure safe, affordable and sustainable drinking water.
- Protect, maintain, enhance and restore water quality in rivers, wetlands and lakes.
- Manage Vermont's groundwater as a public resource for all.

##### **Our Land**

- Support the re-use and development of previously contaminated sites.
- Minimize exposure to hazardous materials.
- Increase recycling and diversion of waste from households and businesses.

##### **Our Air**

- Improve public health by reducing emission of air toxics.
- Support climate policy with scientific analysis and timely emissions tracking.
- Maintain and improve Vermont's air quality and increase visibility across our landscape.

##### **Our Communities**

- Provide financial, technical and planning assistance to help communities protect Vermont's land, air and water.
- Support municipal investment in drinking water and wastewater infrastructure.
- Increase community resilience with natural hazard prevention, planning and response.

##### **Our Customers**

- Help Vermonters understand the environmental impact of personal and community decisions through communication, assistance, and enforcement.
- Deliver clear, fair, and predictable permitting decisions for applicants.
- Provide accurate environmental information and data to educate, guide and engage Vermonters.

## B. EPANE's Strategic Priorities

EPANE's Strategic Plan charts the course for advancing USEPA's priorities and mission to protect human health and the environment. The FY2018-2022 USEPA Strategic Plan<sup>2</sup> ("EPA Plan") was developed in accordance with the Government Performance and Results Modernization Act of 2011 and identifies the measurable environmental and human health outcomes the public can expect during the period from 2018-2022 along with describing how USEPA intends to achieve those results. The EPA Plan represents commitment to core values of science, transparency, accountability and the rule of law in managing environmental programs.

The EPA Plan identifies three strategic goals along with supporting objectives, which are as follows:

- Goal 1: A Cleaner, Healthier Environment: Deliver a cleaner, safer, and healthier environment for all Americans and future generations by carrying out the Agency's core mission.
  - Objective 1.1 – Improve Air Quality
  - Objective 1.2 – Provide for Clean and Safe Water
  - Objective 1.3 – Revitalize Land and Prevent Contamination
  - Objective 1.4 – Ensure Safety of Chemicals in the Marketplace
- Goal 2: More Effective Partnerships: Provide certainty to states, localities, tribal nations, and the regulated community in carrying out shared responsibilities and communicating results to all Americans.
  - Objective 2.1 – Enhance Shared Accountability
  - Objective 2.2 – Increase Transparency and Public Participation
- Goal 3: Greater Certainty, Compliance, and Effectiveness: Increase certainty, compliance, and effectiveness by applying the rule of law to achieve more efficient and effective agency operations, service delivery, and regulatory relief.
  - Objective 3.1 – Compliance with the Law
  - Objective 3.2 – Create Consistency and Certainty
  - Objective 3.3 – Prioritize Robust Science
  - Objective 3.4 – Streamline and Modernize
  - Objective 3.5 – Improve Efficiency and Effectiveness

The EPA Plan prioritizes environmental justice and focuses on urban, rural, and economically disadvantaged communities to ensure that everyone, regardless of age, race, economic status, or ethnicity, has access to clean water and clean air as well as the opportunity to live, work, and play in healthy communities. In addition, the EPA Plan includes USEPA's Agency Priority Goals (APG), a component of the Administration's performance management framework which supports improvement in near-term outcomes related to the Strategic Plan. More information on the Agency's APGs is available at <https://www.performance.gov/>. USEPA's FFY2018 – FFY2019 Agency Priority Goals include the following:

- APG-1: Improve air quality by implementing pollution control measures to reduce the number of nonattainment areas;
- APG-2: Empower communities to leverage USEPA water infrastructure investments;

- APG-3: Accelerate the pace of cleanups and return sites to beneficial use in their communities;
- APG-4: Meet new statutory requirements to improve the safety of chemicals in commerce;
- APG-5: Increase environmental law compliance rate;
- APG-6: Accelerate permitting-related decisions.

### C. Cross-Walk Between USEPA’s and VT DEC’s Priorities

State Priorities	Our Water	Our Land	Our Air	Our Communities	Our Customers
<b>USEPA Goals</b>					
<b>Goal 1:</b> Core Programs	X	X	X		
<b>Goal 2:</b> Cooperative Federalism				X	X
<b>Goal 3:</b> Rule of Law					X

## IV. Grants Management

### A. Budget Narrative

This Performance Partnership Agreement (PPA) covers a four-year period including federal fiscal years (FFY) 2020, 2021, 2022 and 2023, with a start date of October 1, 2019 and end date of September 30, 2023. The PPA, together with work plans as represented by the associated Priorities and Commitments (P&C Lists) and related comprehensive VT DEC work plans, 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 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:

- Air Pollution Control – CAA Section 105
- Water Pollution Control – CWA Section 106
- Nonpoint Source Management -- CWA Section 319(h)
- Public Water System Supervision --SDWA Section 1443(a)
- Underground Water Source Protection – SDWA Section 1443(b)
- Hazardous Waste Management – SWDA Section 3011(a)
- State Underground Storage Tanks – SWDA Sec. 2007(f)(2) SWDA Section 9010
- Multipurpose grants to states and tribes– Consolidated Appropriations Act, 2018 & 2019 (P.L. 115-141) and (P.L. 116-6))

The PPA and the associated work plans also include additional non-PPG funded work that is necessary to accomplish the environmental and public health goals set forth in VT DEC Strategic Priorities and EPA Plan. VT DEC and EPANE will continue to explore opportunities for grant efficiencies, and measurement of environmental results.

Consistent with ***GPI 12-06, Timely Obligation, Award, and Expenditure of USEPA Grant Funds***, for multi-year awards, VT DEC 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 cover the same time period. USEPA will fund the application incrementally as funds become available.

To be allowable under Federal awards, costs must meet the following general criteria, found in 2 CFR §200 (Subpart E), *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Award*:

Be necessary and reasonable for proper and efficient performance and administration of Federal awards.

- Be allocable to Federal awards under the provisions of this Circular.
- 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 Federal awards 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 Circular, 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 See also §200.306 Cost sharing or matching paragraph (b).
- Be the net of all applicable credits.
- Be adequately documented. See also §200.300 through §200.309 – Standards for Financial and Program Management.

## **B. Federal Regulations and Key Policies**

All categorical environmental state grants, including PPGs are governed by [40 CFR §35](#) – State and Local Assistance, Subpart A – Environmental Program Grants and subject to both 2 CFR §200 – Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards and 2 CFR §1500 Subpart E, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. PPGs and PPAs do not supersede any laws, regulations, or delegation agreements.

VT DEC and EPANE may agree to add competitive grant funding to a Performance Partnership Grant. In these circumstances, the competitive grant work plan commitments are added to the Performance Partnership Grant work plan. After the funds have been added to the Performance Partnership Grant, VT DEC 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, VT DEC 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 defined in the following section, which are referenced in 40 CFR §35.140:

- 40 CFR §35.268(b) – Award Limitations, Financial Assistance to Persons
- 40 CFR §35.268(c) – Award Limitations, Administrative Costs
- 40 CFR §35.272 – Funding Coordination
- 40 CFR §35.298 (c) – Award Limitations
- 40 CFR §35.298 (d) – Award Limitations
- 40 CFR §35.298 (e) – Award Limitations
- 40 CFR §35.298 (g) – Award Limitations

PPG work plans are subject to the same requirements as any other grant work plan as defined in [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. VT DEC and EPANE agree to clearly identify the portion of the PPA that is serving as the and distinguish this portion from the rest of the PPA. This is defined in [40 CFR §35.107\(c\)](#) and is as follows:

“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 5700.7, Environmental Results Under USEPA Assistance Grants)**

[USEPA Order 5700.7](#) 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, EPA program offices must ensure that they can link the work plan to USEPA's Strategic Plan architecture.

The term "output" in USEPA Order 5700.7 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.

## **C. Range of Activities**

VT DEC will use the Performance Partnership Grant, subject to the requirements below, to fund any activity that is eligible for funding under at least one of the environmental programs from which funds are combined into the grant.

VT DEC will use the Performance Partnership Grant to fund multi-media activities that are eligible and have been agreed to by the Commissioner and the Regional Administrator. The range of activities vary as needed by program, but may include staff time for program design and implementation to achieve measurable environment and public health results. Examples of activities include multi-media permitting and, sampling, analysis, ecosystem management, community-based environmental protection, and/or other innovative approaches and activities.

## **D. Work Plan Development Process**

VT DEC will work with EPANE annually to develop, edit and enhance the Priorities and Commitments List (P&C) that serves as the major work plan and documented list of required programmatic deliverables under our grant. VT DEC will use the UPANE SharePoint Site to negotiate and communicate “real time” through the sharing of documents on-line. This process was used to develop the new two-year P&C List for FFY20 and FFY21. 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 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 items such as suggesting edits, additions and deletions. 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, or similar issues experienced at the state levels.

## **E. Reporting & Measures for Evaluating Performance**

For this Agreement, the Department of Environmental Conservation (VT DEC) will continue to produce regular (at least annual) status reports for the elements outlined in the P&C Lists, and status reports for identified Areas for Collaboration. VT DEC and EPANE agree to meet as needed to discuss progress and address any areas of concern.

VT DEC’s annual assessments (also known as “End-of-Year” Progress Reports) are expected to summarize results, track progress on identified P&C List Commitments and Areas for Collaboration, identify areas where progress met or exceeded expectations, as well as areas where there may have been difficulty in achieving projected outcomes. This report is submitted by December 31<sup>st</sup> for the period ending September 30<sup>th</sup> of the prior federal fiscal year.

This reporting is intended to meet the requirements under 40 CFR §35 of a joint evaluation process for state grants, including Performance Partnership Grants (PPGs) including:

- 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.
- 5) Further, if needed, VT DEC and EPANE will convene a PPA meeting to discuss any issues that have arisen as part of this review process.
- 6) VT DEC 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.

VT DEC and EPANE agree to develop and to continuously improve a process for jointly evaluating and reporting progress and accomplishments that comply with 40 CFR §31.115.

## **V. Areas for Collaboration**

### **A. Areas for Collaboration Development Process**

The concept of including a small number of Areas for Collaboration (AFCs) in each multi-year PPA has been introduced. In order to maintain a high level of attention on the new AFCs, and to gain the greatest benefits of a cooperative, problem-solving approach, close communication between both agencies is necessary throughout the Agreement period. Appropriate staff from the two organizations will provide coordinated, narrative updates to senior leadership at least annually to ensure that desired progress is being made on the selected AFCs. At the end of each year, the Areas for Collaboration will be reviewed and amended, as necessary.

The exclusion of a particular issue or program area from the “Areas for Collaboration” section does not indicate a low priority or that significant work is not being accomplished in that area. All core VT DEC and EPANE services are ongoing and remain essential to protecting the environment and public health in Vermont and in New England.

### **B. Description of Areas for Collaboration**

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

Lake Champlain, the nation’s sixth 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.” In 2019, the state of Vermont passed Act 76 which creates a long-term funding source for clean water work throughout the state of Vermont and changes how clean water projects are funded, administered, and implemented. The health of Lake Champlain is a priority for both EPA and VT DEC, and as such, flexibility may be warranted in VT DEC’s commitments to dedicate more resources to this critical effort.

**VT DEC/EPANE Technical Contacts:**

VT DEC Technical Contact(s): Emily Bird

EPANE Technical Contact(s): Erik Perkins

Addressing Aging drinking water and wastewater infrastructure

Much of the drinking water and wastewater infrastructure in Vermont is over half of a century old. Public drinking water treatment plants and associated underground piping needs 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. Over the past several years, VT DEC 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, VT DEC 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 EPANE for potential funding solutions and/or support.

**VT DEC/EPANE Technical Contacts:**

VT DEC Technical Contact(s): Eric Blatt

EPANE Technical Contact(s): Katie Marrese, Jamie Bourne

Supporting and promoting clean-up of 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, VT DEC 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 several years federal funding for the Brownfield Program has decreased, resulting in fewer assessments of contaminated properties in Vermont. Given that the Brownfield Program remains a top priority for VT DEC, our collaboration with EPANE on these efforts are more critical than ever to sustain and ensure forward success.

**VT DEC/EPANE Technical Contacts:**

VT DEC Technical Contact(s): Patricia Coppolino

EPANE Technical Contact(s): Frank Gardner, Dan Keefe

## VI. Environmental Justice

### A. Introduction

The VT DEC, through the FFY 2020 – 2023 Performance Partnership Agreement (PPA), continues to ensure that environmental justice is an integral consideration in the development and implementation of all of our programs.

*Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin (including limited English proficiency), or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.* ([Source: U.S. Environmental Protection Agency](#)). Environmental justice is based on the principle that everyone deserves a healthy environment and that environmental benefits and burdens should be shared equitably.

Many of VT DEC's programs already engage with communities in ways that promote environmental justice, from providing infrastructure support to economically disadvantaged communities to testing for lead in drinking water in all Vermont schools and childcare centers. VT DEC is committed to protecting Vermont's most vulnerable populations and ensuring meaningful public participation in our decision making.

As VT DEC begins to develop an adopt a formal Environmental Justice Policy. there are three fundamental Environmental Justice principles that will be addressed:

- (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 principles guide the Environmental Equity/Environmental Justice (EE/EJ) work of VT DEC. There is a growing body of evidence that suggests that 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 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.

## **Supporting Disadvantaged Communities**

EPA and VT DEC 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 and longer loan terms than for non-disadvantaged communities for water infrastructure projects, 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 applies affordability criteria which include 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 FFY2019 Intended Use Plan includes funding for disadvantaged communities. Additionally, the definition of a disadvantaged municipality is codified in State law at 24 VSA §4752(12).

## **B. Key Project Areas**

1. EJ Policy – VT DEC will work with EPA, communities and key stakeholders such as non-profits and educational institutions to develop and implement an Environmental Justice Policy that will ensure that environmental justice is incorporated into all of our programs. VT DEC will continue to 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, VT DEC will use EPA's new environmental justice (EJ) mapping and screening tool EJSCREEN to help to identify target communities and issues.
3. Title VI and Limited English Proficiency – VT DEC will continue to ensure that 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 strive 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.

## **APPENDICES**

***Appendix A***

**2020-2021 Priorities and Commitments List**

No.	Strategic Linkage	New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
			<i>Ozone, PM<sub>2.5</sub>, PM<sub>10</sub> and CO</i>	<i>Ozone, PM<sub>2.5</sub>, PM<sub>10</sub> and CO</i>
1	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Continue participation in EPA's AIRNOW program. Submit real-time pollutant data and provide forecasts and alerts. Attend R1 air quality outreach and forecasting workshop in 2019, if held, either in person or remotely. (FY'20-21 OAR NPM Guidance: NAAQS, A.4.2. #8 and NAAQS A.1.1.3 Other #3)	Continue participation in EPA's AIRNOW program. Submit real-time pollutant data and provide forecasts and alerts. Attend R1 air quality outreach and forecasting workshop, if held, either in person or remotely and, if resources allow, the EPA National Air Quality Conference. (FY'20-21 OAR NPM Guidance: NAAQS, A.4.2. #8 and NAAQS A.1.1.3 Other #3)
2	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Submit air emissions data for 2018 for large, Type A point sources to EPA's NEI by 12/31/2019. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.3. Other #3)	Submit air emissions data for 2019 for large, Type A point sources to EPA's NEI by 12/31/2020. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.3. Other #3)
3	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Work with EPA on annual update to the SIP Plan. Target date for updated plan is December 31, 2019.	Work with EPA on annual update to the SIP Plan. Target date for updated plan is December 31, 2020.
4	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Following implementation of an electronic data collection and management system for the Vermont I/M program, submit an I/M SIP Revision reflecting changes to the program. (FY'20-21 OAR NPM Guidance: Mobile Source Programs, II.A.8.1, #1)	Following implementation of an electronic data collection and management system for the Vermont I/M program, submit an I/M SIP Revision reflecting changes to the program. (FY'20-21 OAR NPM Guidance: Mobile Source Programs, II.A.8.1, #1)
6	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Same	Submit infrastructure SIP, including the transport element, for the 2015 Ozone NAAQS. SIP was due Oct. 1, 2018. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.1 #1)	Submit infrastructure SIP for the 2015 Ozone NAAQS. SIP is due Oct. 1, 2018. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.1 #1)
7	Goal 1: Core Mission Objective 1.1: Improve Air Quality	New	Work on outreach and educational efforts to address wood smoke issues. By April 30, 2020, submit a brief summary of outreach and educational activities completed. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.3. #9)	Work on outreach and educational efforts to address wood smoke issues. By April 30, 2021, submit a brief summary of outreach and educational activities completed. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.3. #9)
8	Goal 1: Core Mission Objective 1.1: Improve Air Quality	New	Work with Region 1 on VT's PM Advance Program and to implement VT's 2018 Path Forward. This can include outreach/education in selected mountain valley locations, deployment of a mobile PM <sub>2.5</sub> monitor, or other woodsmoke mitigation activities listed in your Path Forward. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.3. #9)	Work with Region 1 on VT's PM Advance Program and to implement VT's 2018 Path Forward. This can include outreach/education in selected mountain valley locations, deployment of a mobile PM <sub>2.5</sub> monitor, or other woodsmoke mitigation activities listed in your Path Forward. (FY'20-21 OAR NPM Guidance: NAAQS, A.1.2.3. #9)
			<i>Pb, NO<sub>2</sub> and SO<sub>2</sub></i>	<i>Pb, NO<sub>2</sub> and SO<sub>2</sub></i>
			<i>Regional Haze</i>	<i>Regional Haze</i>
9	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Continue to develop a Regional Haze SIP for the second regional haze planning period, due July 31, 2021. (FY'20-21 OAR NPM Guidance: Regional Haze, A.2.2 #3)	Submit Regional Haze SIP for the second regional haze planning period, due July 31, 2021. (FY'20-21 OAR NPM Guidance: Regional Haze, A.2.2 #3)
			<i>Title V / NSR Permits</i>	<i>Title V / NSR Permits</i>
10	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	During FY'20, ensure that 100 percent of Title V significant modifications are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #1 and #2)	During FY'21, ensure that 100 percent of Title V significant modifications are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #1 and #2)
11	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	During FY'20, ensure that 100 percent of new Title V operating permits are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #1 and #2)	During FY'21, ensure that 100 percent of new Title V operating permits are issued within 18 months of receiving a complete permit application. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #1 and #2)
12	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Title V renewals: Document the number of expired Title V permits as of Oct. 1, 2019 and reduce the total universe by 10% during the fiscal year. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #1 and #2)	Title V renewals: Document the number of expired Title V permits as of Oct. 1, 2020 and reduce the total universe by 10% during the fiscal year. Provide necessary data through the TOPS Tracking Form to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #1 and #2)
13	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	During FY'20, issue all major NSR permits within 12 months of receiving a complete permit application. Provide necessary data to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2.4.)	During FY'21, issue all major NSR permits within 12 months of receiving a complete permit application. Provide necessary data to document the goal every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2.4.)
14	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	During FY'20, ensure that data are submitted to EPA's RACT, BACT, LAER Clearinghouse for new major sources and major modifications within 90 days of permit issuance. Provide the data documenting the timeliness of the submissions every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #5 and #6)	During FY'21, ensure that data are submitted to EPA's RACT, BACT, LAER Clearinghouse for new major sources and major modifications within 90 days of permit issuance. Provide the data documenting the timeliness of the submissions every six months. (FY'20-21 OAR NPM Guidance: Title V & NSR Permitting, A.3.2., #5 and #6)
15	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	<del>Update New Source Review (NSR) regulations to incorporate federal NSR reform provisions.</del>	<del>Update New Source Review (NSR) regulations to incorporate federal NSR reform provisions.</del>
			<i>Air Monitoring</i>	<i>Air Monitoring</i>

No.	Strategic Linkage	New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
16	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Air Monitoring Network: Submit to EPA by July 1, 2020 the annual air monitoring network plan (40 CFR 58.10). State Plan should be made available for public and EPA review by May 31, 2020 at the latest. The Plan should include ensuring monitoring networks are consistent with the requirements of recent NO <sub>2</sub> , SO <sub>2</sub> , CO, lead and ozone NAAQS rules, in particular. <b>(FY'20-21 OAR NPM Guidance: Ambient Air Monitoring for Criteria Pollutants, A.4.2, #4)</b>	Air Monitoring Network: Submit to EPA by July 1, 2021 the annual air monitoring network plan (40 CFR 58.10). State Plan should be made available for public and EPA review by May 31, 2021 at the latest. The Plan should include ensuring monitoring networks are consistent with the requirements of recent NO <sub>2</sub> , SO <sub>2</sub> , CO, lead and ozone NAAQS rules, in particular. <b>(FY'20-21 OAR NPM Guidance: Ambient Air Monitoring for Criteria Pollutants, A.4.2, #4)</b>
17	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Air Monitoring Network: Operate EPA-approved network (SLAMS, PM), enter the air monitoring, precision and accuracy data into AQS within 90 days (180 days for PAMS) of the end of each calendar quarter (40 CFR 58.12, 58.14, & 58.16) and submit the Annual Air Quality Data certification by May 1, 2020 (40 CFR 58.15). <b>(FY'20-21 OAR NPM Guidance: Ambient Air Monitoring for Criteria Pollutants, A.4.2, #1, #6, and #7)</b>	Air Monitoring Network: Operate EPA-approved network (SLAMS, PM), enter the air monitoring, precision and accuracy data into AQS within 90 days (180 days for PAMS) of the end of each calendar quarter (40 CFR 58.12, 58.14, & 58.16) and submit the Annual Air Quality Data certification by May 1, 2021 (40 CFR 58.15). <b>(FY'20-21 OAR NPM Guidance: Ambient Air Monitoring for Criteria Pollutants, A.4.2, #1, #6, and #7)</b>
18	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Quality Assurance: Submit QAPP updates for all gaseous and PM criteria pollutants by November 1, 2019. Ensure adequate, independent QA audits of NAAQS monitors or participate in NPAP and PEP QA programs. <b>(Final FY 2020-2021 OAR NPM Guidance: Ambient Air Monitoring for Criteria Pollutants, A.4.2, #1)</b>	Quality Assurance: Submit QAPP updates for all gaseous and PM criteria pollutants by November 1, 2020. Ensure adequate, independent QA audits of NAAQS monitors or participate in NPAP and PEP QA programs. <b>(Final FY 2020-2021 OAR NPM Guidance: Ambient Air Monitoring for Criteria Pollutants, A.4.2, #1)</b>
19	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Same	Toxics Air Monitoring: Continue operation of the toxics air monitoring sites and enter the data into AQS. State should analyze data collected. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.6.2, #1)</b>	Toxics Air Monitoring: Continue operation of the toxics air monitoring sites and enter the data into AQS. State should analyze data collected. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.6.2, #1)</b>
20	Goal 1: Core Mission Objective 1.1: Improve Air Quality	New	Air Monitoring Network: Send at least 2 State staff members to National Ambient Air Monitoring Conference expected in August 2020. <b>(FY '20 Ambient Air Monitoring Appendix to NPM Guidance.)</b>	
21	Goal 1: Core Mission Objective 1.1: Improve Air Quality	New	Air Monitoring Network: Conduct and submit Five Year Network Assessment to ensure all air monitoring objectives are met. Should conduct public notice (along with ANP) and must be submitted to EPA by July 1, 2020. <b>(FY'20-21 OAR NPM Guidance: Ambient Air Monitoring for Criteria Pollutants, A.4.2 #5)</b>	
22	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Technical forum: EPA Region 1 will help facilitate scheduling of at least one technical forum during FY '20 to help ensure the technical air monitoring staff are properly trained and best practices are shared among all air staff in each State and tribe in EPA Region 1.	Technical forum: EPA Region 1 will help facilitate scheduling of at least one technical forum during FY '21 to help ensure the technical air monitoring staff are properly trained and best practices are shared among all air staff in each State and tribe in EPA Region 1.
			<i>Air Toxics</i>	<i>Air Toxics</i>
23	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Participate in a regional air toxics workshop if held by EPA Region 1 in FY 2020 to discuss various NESHAP implementation issues.	Participate in a regional air toxics workshop if held by EPA Region 1 in FY 2021 to discuss various NESHAP implementation issues.
24	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Same	Continue delegation and implementation of federal requirements under section 112, 129, and 111(d), as appropriate, for major sources rules, area source rules, and residual risk rules. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.5.2., #1 and #2)</b>	Continue delegation and implementation of federal requirements under section 112, 129, and 111(d), as appropriate, for major sources rules, area source rules, and residual risk rules. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.5.2., #1 and #2)</b>
25	Goal 1: Core Mission Objective 1.1: Improve Air Quality	New	In coordination with the EPA, develop a plan to ensure that only heaters compliant with the 2015 NSPS are being sold by retailers. As appropriate, pursue enforcement actions. Provide EPA with an update of these activities by the end of FY2020. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.5.2, #1)</b>	In coordination with the EPA, develop a plan to ensure that only heaters compliant with the 2015 NSPS are being sold by retailers. As appropriate, pursue enforcement actions. Provide EPA with an update of these activities by the end of FY2021. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.5.2, #1)</b>
26	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Same	Participate in NESCAUM Air Toxics and Public Health Subcommittee and participate in the Vermont Asthma Advisory Panel if meetings are held to implement air toxics reduction strategies.	Participate in NESCAUM Public Health Subcommittee and participate in the Vermont Asthma Advisory Panel to implement air toxics reduction strategies.
27	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Same	Review and comment on the draft 2017 National Air Toxics Assessment (NATA) if it is available for comment. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.5.2., #4)</b>	Review and comment on the draft 2017 National Air Toxics Assessment (NATA) if it is available for comment. <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.5.2., #4)</b>
28	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Submit air toxics emissions inputs for events (such as forest fires) to EPA's NEI by December 15, 2018; submit data for point, onroad, nonroad, CMV, and rail emissions inventory data to EPA's NEI by January 15, 2019; submit inputs for nonpoint categories 1,2a, and 2b by March 31, 2019; submit inputs for nonpoint category 3 by May 31, 2019. These submittals are for sectors for which the state has prepared calendar year 2017 emission estimates. <b>(Final FY 2018-2019 OAR NPM Guidance: NAAQS, 2.1.1.3 Other, #5)</b> <b>This commitment does not apply in FY20, reporting of HAP emissions is typically only done once every 3 years. This item will appear on the FY2022 list.</b>	Submit air toxics emissions inputs for events (such as forest fires) to EPA's NEI by December 15, 2018; submit data for point, onroad, nonroad, CMV, and rail emissions inventory data to EPA's NEI by January 15, 2019; submit inputs for nonpoint categories 1,2a, and 2b by March 31, 2019; submit inputs for nonpoint category 3 by May 31, 2019. These submittals are for sectors for which the state has prepared calendar year 2017 emission estimates. <b>(Final FY 2018-2019 OAR NPM Guidance: NAAQS, 2.1.1.3 Other, #5)</b> <b>This commitment does not apply in FY21, reporting of HAP emissions is typically only done once every 3 years. This item will appear on the FY2022 list.</b>

No.	Strategic Linkage	New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
29	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Same	As resources allow, review sources lists provided by EPA under the residual risk and technology review (RTR) program to determine whether the sources identified are covered by the standard. In addition, review and comment on RTR emissions data for sources in the state.	As resources allow, review sources lists provided by EPA under the residual risk and technology review (RTR) program to determine whether the sources identified are covered by the standard. In addition, review and comment on RTR emissions data for sources in the state.
30	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Revised	Pursuant to the final Emission Guidelines for Municipal Solid Waste Landfills submit in the first quarter a negative declaration in lieu of state plan <b>(FY'20-21 OAR NPM Guidance: Air Toxics Program Implementation, A.5.2., #1)</b>	
			<i>GHG Reporting</i>	<i>GHG Reporting</i>
31	Goal 1: Core Mission Objective 1.1: Improve Air Quality	Same	As resources allow, work with EPA on the implementation of the Greenhouse Gas Reporting Rule. Activities may include: 1) reviewing a list of VT facilities that may be subject to reporting rule but did not report; 2) answering and/or directing questions from facilities on the rule.	As resources allow, work with EPA on the implementation of the Greenhouse Gas Reporting Rule. Activities may include: 1) reviewing a list of VT facilities that may be subject to reporting rule but did not report; 2) answering and/or directing questions from facilities on the rule.

No.	Strategic Linkage	New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
			<i>Source Water Protection</i>	<i>Source Water Protection</i>
1	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Meet minimums of 95% of CWS and 95% of the population where risk to public health is minimized through source water protection. Continue to support implementation of local source water protection programs and, where appropriate, continue to integrate source water protection implementation into other programs appropriate (e.g., UIC, stormwater). (SP-4a & b)	Meet minimums of 95% of CWS and 95% of the population where risk to public health is minimized through source water protection. Continue to support implementation of local source water protection programs and, where appropriate, continue to integrate source water protection implementation into other programs appropriate (e.g., UIC, stormwater). (SP-4a & b)
			<i>Drinking Water</i>	<i>Drinking Water</i>
2	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Work to achieve target of 92% of the population served by CWSs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 2.1.1)	Work to achieve target of 92% of the population served by CWSs having drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. (SDW 2.1.1)
3	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Work to achieve target of 92% of CWSs that provide drinking water that meets all applicable health-based standards through approaches including effective treatment and source water protection. (SP-1)	Work to achieve target of 92% of CWSs that provide drinking water that meets all applicable health-based standards through approaches including effective treatment and source water protection. (SP-1)
4	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	RTCR Rule: Work on preparations to submit a complete primacy package application by implementation agreement deadline.	RTCR Rule: Work on preparations to submit a complete primacy package application by implementation agreement deadline.
5	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Sanitary surveys: 100% of all CWS have undergone a sanitary survey within 3 years of the last survey (or every 5 years for outstanding performers or gw systems approved by state for 4-log treatment). Ensure 100% of CWSs served by surface water/GWUDI are surveyed in this time period. For Groundwater Rule, complete a survey for all groundwater CWS on a three year cycle and all NTNCWSs on a five year cycle (i.e., ~50 NTNCWS/year). Report all surveys to SDWIS (SDW1a)	Sanitary surveys: 100% of all CWS have undergone a sanitary survey within 3 years of the last survey (or every 5 years for outstanding performers or gw systems approved by state for 4-log treatment). Ensure 100% of CWSs served by surface water/GWUDI are surveyed in this time period. For Groundwater Rule, complete a survey for all groundwater CWS on a three year cycle and all NTNCWSs on a five year cycle (i.e., ~50 NTNCWS/year). Report all surveys to SDWIS (SDW1a)
6	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Sanitary surveys: 100% of all TNCWSs will meet the five year cycle (~143/yr?) with progress and capacity evaluated at the mid-year point. Report all surveys to SDWIS. (SDW1a)	Sanitary surveys: 100% of all TNCWSs will meet the five year cycle (~143/yr?) with progress and capacity evaluated at the mid-year point. Report all surveys to SDWIS. (SDW1a)
7	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	All Hazards/Climate Resiliency: continue to help water systems prepare/protect infrastructure and water quality impacted by extreme weather events; coordinate with EPA on related workshops and exercises; and provide technical assistance to drinking water systems. State will report the number of drinking water systems receiving technical assistance. (SDW-21).	All Hazards/Climate Resiliency: continue to help water systems prepare/protect infrastructure and water quality impacted by extreme weather events; coordinate with EPA on related workshops and exercises; and provide technical assistance to drinking water systems. State will report the number of drinking water systems receiving technical assistance. (SDW-21).
8	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Maintain timely and accurate reporting to SDWIS and otherwise comply with 40 CFR 142.15. State will also work towards preparing to migrate data from SDWIS State and state-developed data systems to SDWIS Prime.	Maintain timely and accurate reporting to SDWIS and otherwise comply with 40 CFR 142.15. State will also work towards preparing to migrate data from SDWIS State and state-developed data systems to SDWIS Prime.
9	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Coordinate with EPA on mid-year and year-end PWSS reviews, including status of various rule implementation, GPRA progress, and resource issues.	Coordinate with EPA on mid-year and year-end PWSS reviews, including status of various rule implementation, GPRA progress, and resource issues.
10	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Work to achieve target of 100% of the FY2020 EPA Region 1 Drinking Water Annual Commitment Measures for Vermont thru timely and appropriate actions as discussed in EPA's 12/8/09 Drinking Water Enforcement Response Policy that address and/or return public water systems identified by the Enforcement Targeting Tool to compliance.	Work to achieve target of 100% of the FY2021 EPA Region 1 Drinking Water Annual Commitment Measures for Vermont thru timely and appropriate actions as discussed in EPA's 12/8/09 Drinking Water Enforcement Response Policy that address and/or return public water systems identified by the Enforcement Targeting Tool to compliance.
11	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Continue regional quarterly status reporting on COM & NTNC Lead & Copper Rule compliance and meet state commitments in response to EPA Deputy Assistant Administrator's February 2016 request (e.g. data transparency, etc.)	Continue regional quarterly status reporting on COM & NTNC Lead & Copper Rule compliance and meet state commitments in response to EPA Deputy Assistant Administrator's February 2016 request (e.g. data transparency, etc.)

12	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Work to achieve 97% of COM and NTNC systems meeting the lead Action Level.	Work to achieve 97% of COM and NTNC systems meeting the lead Action Level.
13	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Work to strengthen water systems' technical, managerial, and financial capacity and continue to maintain an effective operator certification program.	Work to strengthen water systems' technical, managerial, and financial capacity and continue to maintain an effective operator certification program.
			<i>UIC</i>	<i>UIC</i>
14	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Continue to identify and to close motor vehicle waste disposal wells and large capacity cess pools; report number identified and number closed (UIC National Measure SDW-8). Continue to report UIC activities (e.g., number of inspections conducted, number of permits issued, number of wells closed, UIC enforcement activity, etc.) to EPA per 7520 forms or equivalent through the National Exchange Network.	Continue to identify and to close motor vehicle waste disposal wells and large capacity cess pools; report number identified and number closed (UIC National Measure SDW-8). Continue to report UIC activities (e.g., number of inspections conducted, number of permits issued, number of wells closed, UIC enforcement activity, etc.) to EPA per 7520 forms or equivalent through the National Exchange Network.
15	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Submit the UIC primacy package to the EPA.	Submit the UIC primacy package to the EPA.
16	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Continue to implement improvements for registering UIC Class V wells in accordance with 40 CFR 144.26(a) inventory collection requirements and the state's Exchange Network grant.	Continue to implement improvements for registering UIC Class V wells in accordance with 40 CFR 144.26(a) inventory collection requirements and the state's Exchange Network grant.
			<i>Water Monitoring</i>	<i>Water Monitoring</i>
17	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Continue implementing comprehensive water monitoring strategy covering lakes, rivers, estuaries and wetlands.	Continue implementing comprehensive water monitoring strategy covering lakes, rivers, estuaries and wetlands.
18	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Conduct statewide probabilistic survey and assessment of at least one water resource and at least one designated use with applicable water quality standard. Provide schedule and progress report for multi-year surveys.	Conduct statewide probabilistic survey and assessment of at least one water resource and at least one designated use with applicable water quality standard. Provide schedule and progress report for multi-year surveys.
19	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Report on outcomes of monitoring activities using FY2019 106 supplemental funding for monitoring by Dec. 31, 2020, and prepare workplan for FY2020 106 supplemental funds by April 15, 2020.	Report on outcomes of monitoring activities using FY2020 106 supplemental funding for monitoring by Dec. 31, 2021, and prepare workplan for FY2021 106 supplemental funds by April 15, 2021.
20	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Participate as feasible in New England-wide projects and activities, and attend relevant regional meetings/conferences.	Participate as feasible in New England-wide projects and activities, and attend relevant regional meetings/conferences.
21	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Participate in or coordinate with EPA Office of Water's National Aquatic Resource Surveys (NARS) and submit workplan reflecting level of participation.	Participate in or coordinate with EPA Office of Water's National Aquatic Resource Surveys (NARS) and submit workplan reflecting level of participation.
			<i>303(d)/305(b)</i>	<i>303(d)/305(b)</i>
22	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Submit 2020 305(b)/303(d) Integrated Report by April 1, 2020.	Submit electronic updates to the 305(b)/303(d) Integrated Report by April 1, 2021.
23	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Update CALM as needed by Dec. 31, 2019.	Update CALM as needed by Dec. 31, 2021.
24	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Georeference waters to NHD (1:24,000 or finer resolution) if not already done.	Georeference waters to NHD (1:24,000 or finer resolution) if not already done.
			<i>STORET/WQX (Water Quality Exchange)</i>	<i>STORET/WQX (Water Quality Exchange)</i>
25	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Provide annual uploads of physical, chemical and biological monitoring data to WQX (STORET).	Provide annual uploads of physical, chemical and biological monitoring data to WQX (STORET).
			<i>Water Quality Standards - Biological, Nutrient, Temperature</i>	<i>Water Quality Standards - Biological, Nutrient, Temperature</i>
26	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Continue development of numerical biological criteria for streams and lakes/ponds.	Continue development of numerical biological criteria for streams and lakes/ponds.

27	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Continue efforts toward addressing flow quantity, water level and temperature issues to ensure protection of instream waters uses. EPA will continue efforts toward addressing flow quantity and water level issues to ensure protection of instream water users and quality with VTDEC, VTFW, and other state and federal agencies.	Continue efforts toward addressing flow quantity, water level and temperature issues to ensure protection of instream waters uses. EPA will continue efforts toward addressing flow quantity and water level issues to ensure protection of instream water users and quality with VTDEC, VTFW, and other state and federal agencies.
28	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Continue ongoing WQS reviews, activities, and work with EPA to resolve outstanding issues. (WQ-03a, WQ-04a)	Continue ongoing WQS reviews, activities, and work with EPA to resolve outstanding issues. (WQ-03a, WQ-04a)
			<i>TMDL Development</i>	<i>TMDL Development</i>
29	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Work toward completion of any remaining prior year TMDL commitments.	Work toward completion of any remaining prior year TMDL commitments.
30	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	By 08/31/19, provide EPA R1 with a draft list of 303(d) Vision priority waters, scheduled for 2019-2022 timeframe, and electronic data for entry into ATTAINS database by EPA HQ. (WQ27)	By 08/31/20, provide EPA R1 with a draft list of 303(d) Vision priority waters, scheduled for 2019-2022 timeframe, and electronic data for entry into ATTAINS database by EPA HQ. (WQ27)
31	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	By 09/30/19, agree on FY20 waterbody commitments for TMDL development (future substitutions allowed), TMDL alternatives, and protection plans, as appropriate. During FY20 and before 09/30/20, submit TMDLs to EPA for review and approval, along with TMDL alternatives and protection plans as per the state's schedule for 303(d) Vision priorities (WQ-27) and other planned activities. (WQ-28)	By 09/30/20, agree on FY21 waterbody commitments for TMDL development (future substitutions allowed), TMDL alternatives, and protection plans, as appropriate. During FY21 and before 09/30/21, submit TMDLs to EPA for review and approval, along with TMDL alternatives and protection plans as per the state's schedule for 303(d) Vision priorities (WQ-27) and other planned activities.
32	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Circa fall 2019, if needed, and following public and EPA review, submit electronic data to EPA during the FY19 "open season" in ATTAINS to accommodate any essential revisions to 303(d) Vision priorities (WQ-27) and other planned activities.	Circa fall 2020, if needed, and following public and EPA review, submit electronic data to EPA during the FY19 "open season" in ATTAINS to accommodate any essential revisions to 303(d) Vision priorities (WQ-27) and other planned activities.
33	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	If the State chooses to pursue partial credit for progress on priority TMDLs, TMDL alternatives, and protection plans, then notify EPA R1 of milestones achieved (planning, developing) for entry into ATTAINS by October 31, 2020.	If the State chooses to pursue partial credit for progress on priority TMDLs, TMDL alternatives, and protection plans, then notify EPA R1 of milestones achieved (planning, developing) for entry into ATTAINS by October 31, 2021.
34	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	Participate in Region 1/State/NEIWPCC TMDL efforts to improve environmental effectiveness of the TMDL program.	Participate in Region 1/State/NEIWPCC TMDL efforts to improve environmental effectiveness of the TMDL program.
			<i>NPS 319</i>	<i>NPS 319</i>
35	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	National Guidelines: Use the Nonpoint Source Program and Grants Guidelines for States and Territories released on April 12, 2013, to identify eligible activities, program priorities, programmatic conditions, and reporting requirements. At least 50% of 319 funding will be used for implementing watershed-based plans (WBP) to protect or restore priority waters unless DEC can show evidence of state funded projects as leverage. One nine-element WBP per state will be submitted annually to the Region for review; all alternative watershed-based plans will be submitted to the Region for review and approval. Continue to work with USDA through participation on the State Technical Committee and to support the National Water Quality Initiative, including monitoring. Complete annual Grants Reporting and Tracking System (GRTS) reporting by February 28th, and enter all mandatory GRTS data elements within 90 days of a categorical grant or final PPG award. Submit an annual work	National Guidelines: Use the Nonpoint Source Program and Grants Guidelines for States and Territories released on April 12, 2013, to identify eligible activities, program priorities, programmatic conditions, and reporting requirements. At least 50% of 319 funding will be used for implementing watershed-based plans (WBP) to protect or restore priority water bodies unless DEC can show evidence of state funded projects as leverage. One nine-element WBP per state will be submitted annually to the Region for review; all alternative watershed-based plans will be submitted to the Region for review and approval. Continue to work with USDA through participation on the State Technical Committee and to support the National Water Quality Initiative, including monitoring. Complete annual Grants Reporting and Tracking System (GRTS) reporting by February 28th, and enter all mandatory GRTS data elements within 90 days of a categorical grant or final PPG award. Submit an annual work
36	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Same	NPS meetings/training: A representative of the state's NPS program is expected to attend national and regional NPS and GRTs training workshops, conferences and meetings convened by EPA unless prevented by state-wide travel bans. Annual state work plans should include adequate 319 funds to cover travel expenses for NPS program staff to participate unless state funds are available for this purpose.	NPS meetings/training: A representative of the state's NPS program is expected to attend national and regional NPS and GRTs training workshops, conferences and meetings convened by EPA unless prevented by state-wide travel bans. Annual state work plans should include adequate 319 funds to cover travel expenses for NPS program staff to participate unless state funds are available for this purpose.
37	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Revised	Success Stories: Submit success stories for impairments eliminated in previous years (Type 1 stories) and/or that show improvement in water quality (Type 2 stories) or demonstrate ecological restoration (Type 3 stories). To do this, identify impairments eliminated or waterbodies with demonstrated water quality or habitat improvements, and investigate whether local, state, federal or private NPS mitigation occurred that might make these waterbodies a candidate for a NPS Success Story. Using EPA's guidance ( <a href="https://www.epa.gov/nps/about-nonpoint-source-pollution-success-stories#How">https://www.epa.gov/nps/about-nonpoint-source-pollution-success-stories#How</a> ), prepare and submit to EPA candidate success stories (via the Grants Reporting Tracking System portal) by July 15th. See <a href="https://www.epa.gov/nps/success-stories-about-restoring-water-bodies-impaired-nonpoint-source-pollution">https://www.epa.gov/nps/success-stories-about-restoring-water-bodies-impaired-nonpoint-source-pollution</a> for examples of success stories and other information.	Success Stories: Submit success stories for impairments eliminated in previous years (Type 1 stories) and/or that show improvement in water quality (Type 2 stories) or demonstrate ecological restoration (Type 3 stories). To do this, identify impairments eliminated or waterbodies with demonstrated water quality or habitat improvements, and investigate whether local, state, federal or private NPS mitigation occurred that might make these waterbodies a candidate for a NPS Success Story. Using EPA's guidance ( <a href="https://www.epa.gov/nps/about-nonpoint-source-pollution-success-stories#How">https://www.epa.gov/nps/about-nonpoint-source-pollution-success-stories#How</a> ), prepare and submit to EPA candidate success stories (via the Grants Reporting Tracking System portal) by July 15th. See <a href="https://www.epa.gov/nps/success-stories-about-restoring-water-bodies-impaired-nonpoint-source-pollution">https://www.epa.gov/nps/success-stories-about-restoring-water-bodies-impaired-nonpoint-source-pollution</a> for examples of success stories and other information.

38	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Same	Annual Report: In accordance with the CWA and following the current Nonpoint Source Program and Grants Guidelines, report annually on progress made in implementing the state's NPS Management Program, including a summary of major accomplishments and completed milestones, a description of 319-funded statewide programs and completed 319-funded watershed projects, a list of active 319 projects with expected completion dates, a brief summary of water quality improvements (e.g. restoration of impaired waters or other notable environmental results) and NPS pollutant load reductions (total phosphorus, nitrogen, and sediment reductions for the state, from the previous February's GRTS reporting). Where information is not yet available on load reductions and water quality improvement where implementation is underway, surrogate measures of environmental progress should be used.	Annual Report: In accordance with the CWA and following the current Nonpoint Source Program and Grants Guidelines, report annually on progress made in implementing the state's NPS Management Program, including a summary of major accomplishments and completed milestones, a description of 319-funded statewide programs and completed 319-funded watershed projects, a list of active 319 projects with expected completion dates, a brief summary of water quality improvements (e.g. restoration of impaired waters or other notable environmental results) and NPS pollutant load reductions (total phosphorus, nitrogen, and sediment reductions for the state, from the previous February's GRTS reporting). Where information is not yet available on load reductions and water quality improvement where implementation is underway, surrogate measures of environmental progress should be used.
39	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		New	Management Program Update: By October 1, 2020, have an updated and EPA-approved NPS Management Program in place including annual milestones for 2021-2025.	
40	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Revised	Satisfactory Progress Review: EPA will use information provided by the state (annual report, workplan, GRTS entry, success stories) to determine whether the State has made satisfactory progress in implementing its NPS Management Program in accordance with CWA Section 319(h)(8). If appropriate, EPA will request additional information to assist with the determination. EPA will complete an annual checklist on Progress and Performance and document its findings.	Satisfactory Progress Review: EPA will use information provided by the state (annual report, workplan, GRTS entry, success stories) to determine whether the State has made satisfactory progress in implementing its NPS Management Program in accordance with CWA Section 319(h)(8). If appropriate, EPA will request additional information to assist with the determination. EPA will complete an annual checklist on Progress and Performance and document its findings.
				<i>NPDES Development</i>	<i>NPDES Development</i>
41	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	Action Items to be implemented: Ensure Vermont permits contain citations to the current 2002 EPA WET test methods. Assess RP for WET consistent with Federal Regulations, and incorporate requirements such as representative monitoring and inclusion of acute and chronic WET limits in permits where RP is demonstrated. (Action Items VT-11-02 and 88, and in recent draft PQR)	Action Items to be implemented: Ensure Vermont permits contain citations to the current 2002 EPA WET test methods. Assess RP for WET consistent with Federal Regulations, and incorporate requirements such as representative monitoring and inclusion of acute and chronic WET limits in permits where RP is demonstrated. (Action Items VT-11-02 and 88, and in recent draft PQR)
42	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Revised	The State will continue its best efforts to reduce the NPDES backlog towards a level of not greater than 10% (the national goal) by completing permits for NPDES permits over the next 5 years, such that the backlog is reduced each of these years from FY20 to FY25.	The State will continue its best efforts to reduce the NPDES backlog towards a level of not greater than 10% (the national goal) by completing permits for NPDES permits over the next 5 years, such that the backlog is reduced each of these years from FY20 to FY25.
43	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	The State will maintain the pretreatment permit backlog to a level of no greater than 10%, (WQ-14).	The State will maintain the pretreatment permit backlog to a level of no greater than 10%, (WQ-14).
44	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	The state will inspect and sample Significant Industrial Users (SIUs) at 100% coverage annually.	The state will inspect and sample Significant Industrial Users (SIUs) at 100% coverage annually.
45	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Revised	DEC will work with EPA to develop and finalize a planned approach for permit review.	DEC an EPA will implemnt the agreed upon approach for permit review.
46	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Revised	Continue to implement delegated NPDES storm water program, including Phase II MS4 permits, construction permits and industrial permits.	Continue to implement delegated NPDES storm water program, including Phase II MS4 permits, construction permits and industrial permits.
47	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	Action Item to be implemented: Ensure the permit limits are derived to meet the Phosphorus and Nitrogen Criteria in current State Surface WQSS when the permits are reissued. (40 CFR 122.44(d)) (VT-11-03).	Action Item to be implemented: Ensure the permit limits are derived to meet the Phosphorus and Nitrogen Criteria in current State Surface WQSS when the permits are reissued. (40 CFR 122.44(d)) (VT-11-03).
48	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	DEC will continue to revise and improve its reasonable potential analysis procedures.	DEC will continue to revise and improve its reasonable potential analysis produres.

49	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	Action Item to be implemented: Include the basis for technology-based permit requirements in fact sheets or the administrative record, including discussion of applicable, industry-specific ELG (and subpart) or, in the absence of an ELG, the basis for limitations based on best professional judgment. (from recent PQR) (VT-11-01)	Action Item to be implemented: Include the basis for technology-based permit requirements in fact sheets or the administrative record, including discussion of applicable, industry-specific ELG (and subpart) or, in the absence of an ELG, the basis for limitations based on best professional judgment. (from recent PQR) (VT-11-01)
50	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Revised	The State will continue to work to meet the E-Reporting Rule Phase 1 requirements to upload state NPDES inspections, enforcement actions and penalties. State will continue to work to meet Phase 2 deadline of 12/21/2023 for electronic notices of intent (NOIs) and all other reporting covered in Phase 2.	The State will continue to work to meet the E-Reporting Rule Phase 2 deadline of 12/21/2023 for electronic notices of intent (NOIs) and all other reporting covered in Phase 2.
51	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Revised	Issue permits which include phosphorous effluent limits consistent with allocation in the Lake Champlain TMDL and TMDL Implementation Plan to meet nutrient State Water Quality Standards in the receiving streams and lake. Issuing the permits included in that allocation, including final permits in FY2020 and FY2021.	Issue permits which include phosphorous effluent limits consistent with allocation in the Lake Champlain TMDL and TMDL Implementation Plan to meet nutrient State Water Quality Standards in the receiving streams and lake. Issuing the permits included in that allocation, including final permits in FY2020 and FY2021
52	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	Incorporating on your state agency website (or the R1 EPA NPDES Permitting website) state-issued IPs, Draft IPs, Fact sheets, GPs, the covered GP permittees, the dates of authorization for each GP permittee, and possibly the NOIs for each GP.	Incorporating on your state agency website (or the R1 EPA NPDES Permitting website) state-issued IPs, Draft IPs, Fact sheets, GPs, the covered GP permittees, the dates of authorization for each GP permittee, and possibly the NOIs for each GP.
53	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	If not completed in FY17 or FY18, reissue Construction Stormwater General Permit (CGP) (expired 2013). The reissued permit should include limits from the C&D (Construction and Development) rule which became effective on February 1, 2010. These new enhanced environmental protections are applicable to construction stormwater discharges. The construction general permit should include requirements to prevent spills and leaks (consistent with 40 CFR § 450.21(d)(3)) and to minimize exposure of likely sources of pollution to precipitation and stormwater (consistent with 40 CFR § 450.21(d)(1)). (VT-15-13, VT-15-14)	If not completed in FY17 or FY18, reissue Construction Stormwater General Permit (CGP) (expired 2013). The reissued permit should include limits from the C&D (Construction and Development) rule which became effective on February 1, 2010. These new enhanced environmental protections are applicable to construction stormwater discharges. The construction general permit should include requirements to prevent spills and leaks (consistent with 40 CFR § 450.21(d)(3)) and to minimize exposure of likely sources of pollution to precipitation and stormwater (consistent with 40 CFR § 450.21(d)(1)). (VT-15-13, VT-15-14)
54	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	VT DEC should ensure that permits contain all federal standard conditions and that standard conditions reflect the correct requirements. (VT-15-03)	VT DEC should ensure that permits contain all federal standard conditions and that standard conditions reflect the correct requirements. (VT-15-03)
55	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	VT DEC should ensure applications, including a copy of all submitted data, are submitted on-time (i.e. – at least 180 days prior to permit expiration) and are included in the administrative record. Also, VT DEC should review Schedule A and B application forms to ensure applicants are required to submit additional information, including data analyses and outfall location information, to comply with NPDES regulations at 40 CFR 122.21. (VT-15-02, VT-15-01)	VT DEC should ensure applications, including a copy of all submitted data, are submitted on-time (i.e. – at least 180 days prior to permit expiration) and are included in the administrative record. Also, VT DEC should review Schedule A and B application forms to ensure applicants are required to submit additional information, including data analyses and outfall location information, to comply with NPDES regulations at 40 CFR 122.21. (VT-15-02, VT-15-01)
56	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Revised	If not in FY19, reissue Industrial Stormwater General Permit (expiration date of 8/4/16).	If not in FY20, reissue Industrial Stormwater General Permit (expiration date of 8/4/16).
57	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Revised	<del>Future MS4 permits should contain clear milestones for complete-system inspection and requirements and milestones for illicit connection removal. Also, the construction site stormwater runoff control minimum control measure needs to include a requirement that the permittee develop an ordinance or other mechanism imposing sanctions or enforcement policies to ensure compliance. Also future MS4 permits should contain a requirement to train employees on stormwater management under the pollution prevention minimum control measure as required by 40 CFR 122.34(b)(6).? (VT 11, VT 15 10, VT 15 12)</del>	<del>Future MS4 permits should contain clear milestones for complete-system inspection and requirements and milestones for illicit connection removal. Also, the construction site stormwater runoff control minimum control measure needs to include a requirement that the permittee develop an ordinance or other mechanism imposing sanctions or enforcement policies to ensure compliance. Also future MS4 permits should contain a requirement to train employees on stormwater management under the pollution prevention minimum control measure as required by 40 CFR 122.34(b)(6).? (VT 11, VT 15 10, VT 15 12)</del>
58	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	The State will continue to work to meet the E-Reporting Rule Phase 2 deadline of 12/21/2020 for electronic notices of intent (NOIs) and all other reporting covered in Phase 2.	The State will continue to work to meet the E-Reporting Rule Phase 1 requirement that all state NPDES inspections, enforcement actions and penalties be reflected in the national ICIS data system. The state will continue to work to meet the E-Reporting Rule Phase 2 deadline of 12/21/2023 for electronic notices of intent (NOIs) and all other reporting covered in Phase 2.
59	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	Note: Action Item related to State NPDES Rule Updates and/or MOA revision can be added if requested by VT.	Note: Action Item related to State NPDES Rule Updates and/or MOA revision can be added if requested by VT.

60	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water	Goal 3: Rule of Law & Process Objective 3.4: Streamline & Modernize	Same	For permittees subject to CWA §316(b), VT will provide timely information to the federal Endangered Species Act (ESA) Services (NOAA and USFWS), including permit applications for a 60 day review, as provided in the new Cooling Water Intake Structure (CWIS) Existing Facility Rule.	For permittees subject to CWA §316(b), VT will provide timely information to the federal Endangered Species Act (ESA) Services (NOAA and USFWS), including permit applications for a 60 day review, as provided in the new Cooling Water Intake Structure (CWIS) Existing Facility Rule.
				<i>Wetlands</i>	<i>Wetlands</i>
61	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Same	Update annually a tracking report on gains and losses on wetlands state-wide. Every five years (2010, 2015, etc) report on trends and patterns for the previous five years. (WT-SP22)	Update annually a tracking report on gains and losses on wetlands state-wide. Every five years (2010, 2015, etc) report on trends and patterns for the previous five years. (WT-SP22)
62	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Same	Continue to participate in the NEBAWWG biological monitoring and assessment effort.	Continue to participate in the NEBAWWG biological monitoring and assessment effort.
63	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Same	Continue implementing the wetlands component of Comprehensive Surface Water Monitoring Strategy. (WT-4)	Continue implementing the wetlands component of Comprehensive Surface Water Monitoring Strategy. (WT-4)
64	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Same	Participate in annual meeting with EPA to discuss progress of the state wetland program, WPDG's , and Wetland Program Plan.	Participate in annual meeting with EPA to discuss progress of the state wetland program, WPDG's , and Wetland Program Plan.
65	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Same	Support the Region 1 wetland program priority in 2018 and 2019: Ensure that wetland complexes of high ecological value, blocks of unfragmented habitat, and/or areas that provide resilience for wetland impacts from climate change are protected, and that natural stream flow regimes and riparian corridors are maintained and connected to protect aquatic resources across New England.	Support the Region 1 wetland program priority in 2020 and 2021: Ensure that wetland complexes of high ecological value, blocks of unfragmented habitat, and/or areas that provide resilience for wetland impacts from climate change are protected, and that natural stream flow regimes and riparian corridors are maintained and connected to protect aquatic resources across New England.
				<i>Lake Champlain</i>	<i>Lake Champlain</i>
66	Goal 1: Core Mission Objective 1.2: Provide for Clean & Safe Water		Same	Continue Lake Champlain TMDL implementation consistent with the schedule and actions included in the 2016 Phase 1 Plan.	Continue Lake Champlain TMDL implementation consistent with the schedule and actions included in the 2016 Phase 1 Plan.

No.	Strategic Linkage		New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
				No specific PPA related action for the State	No specific PPA related action for the State
				<b>Objective 4.2 Promote Pollution Prevention</b>	
1	Goal 1: Core Mission Objective 1.4: Ensure Safety of Chemicals in Marketplace	Goal 2: Cooperative Federalism Objective 2.1: Enhance Shared Accountability	Revised	As follow-up to the annual June State/EPA planning meeting, the State will participate in the annual Assistance and Pollution Prevention Forum, as resources permit.	As follow-up to the annual June State/EPA planning meeting, the State will participate in the annual Assistance and Pollution Prevention Forum, as resources permit.
2	Goal 1: Core Mission Objective 1.4: Ensure Safety of Chemicals in Marketplace	Goal 2: Cooperative Federalism Objective 2.1: Enhance Shared Accountability	New	Work with EPA to manage deliverables for the "Pollution Prevention Strategies for Breweries, Dairy Producers and Specialty Foods Producers" projects which will provide pollution prevention technical assistance to the Vermont business sectors listed above to reduce the strength and volume of process wastewater, implement energy efficiency measures, conserve water and reduce solid and hazardous waste.e Vermont brewery industry to reduce the strength and volume of brewery discharges of wastewater pollutants, implement energy efficiency, water conservation and waste reduction projects.	Should the state be awarded P2 grant funds in FY20 for FY21-FY22 project work, a new commitment may be included for FY21 when the P&C list is reopened.

No.	Strategic Linkage	New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
			<i>Environmental Justice</i>	<i>Environmental Justice</i>
1	Goal 2: Cooperative Federalism Objective 2.2: Increase Transparency & Public Participation	Revised	As resources allow, in coordination with EPA New England, identify any ongoing and implement new activities that will advance environmental justice within state programs. Continue to participate on the state EJ quarterly calls. Document EJ success stories and activities and share with the community as resources allow.	As resources allow, in coordination with EPA New England, identify any ongoing and implement new activities that will advance environmental justice within state programs. Continue to participate on the state EJ quarterly calls. Document EJ success stories and activities and share with the community as resources allow.
1b	Goal 2: Cooperative Federalism Objective 2.2: Increase Transparency & Public Participation	New	Continue to collaborate with local partners and educate staff in water, air and RCRA programs on Environmental Justice, including training on any new state or federal policies.	
1c	Goal 2: Cooperative Federalism Objective 2.2: Increase Transparency & Public Participation	New	Draft an Environmental Justice Policy for the Department which addresses environmental justice related to planning and permitting for programs in air, water and RCRA.	Adopt Environmental Justice Policy for the Department which addresses environmental justice related to planning and permitting for programs in air, water and RCRA.
			<i>Sustainable Materials Management</i>	<i>Sustainable Materials Management</i>
2	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	VT will continue to work on projects that reduce or divert municipal solid waste from incineration and landfills while supporting a sustainable materials approach. This approach, emphasizing the value of materials, will lead to increasing source reduction, reuse, recycling and composting. As part of this work, the state will enter solid waste data as part of the State Data Measurement sharing Program.	VT will continue to work on projects that reduce or divert municipal solid waste from incineration and landfills while supporting a sustainable materials approach. This approach, emphasizing the value of materials, will lead to increasing source reduction, reuse, recycling and composting. As part of this work, the state will enter solid waste data as part of the State Data Measurement sharing Program.
			<i>RCRA Authorization</i>	<i>RCRA Authorization</i>
3	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	VT will seek authorization of updated rules.	VT will initiate rulemaking for the next set of rules.
			<i>RCRA Permit Renewals</i>	<i>RCRA Permit Renewals</i>
4	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Revised	Renew two (2) permits on FY 18-22 permit renewal baseline	Renew zero (0) permits on FY 18-22 permit renewal baseline
			<i>UST</i>	<i>UST</i>
			<i>STAG funds are included in the PPG to cover costs for UST Program activities that are ineligible with LUST Prevention (LP) Funds. LP funds are not PPG eligible - funds are in separate cooperative agreement.</i>	<i>STAG funds are included in the PPG to cover costs for UST Program activities that are ineligible with LUST Prevention (LP) Funds. LP funds are not PPG eligible - funds are in separate cooperative agreement.</i>
5	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Improve UST Operational Compliance: (a) maintain or increase number of field inspections to determine significant operational compliance.	Improve UST Operational Compliance: (a) maintain or increase number of field inspections to determine significant operational compliance.
6	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Improve UST Operational Compliance: (b) continue to improve operational compliance by 0.5% over rate of previous year.	Improve UST Operational Compliance: (b) continue to improve operational compliance by 0.5% over rate of previous year.
7	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Continue to inspect federally regulated UST facilities at least once every 3 years.	Continue to inspect federally regulated UST facilities at least once every 3 years.
8	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Reduce Number of Confirmed UST Releases Annually.	Reduce Number of Confirmed UST Releases Annually.
9	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Continue with implementation of operator training program.	Continue with implementation of operator training program.
10	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Post the annual USTCA public record which will include: the number, sources, and causes of underground storage tank releases; the record of compliance by USTs; and data on the number of UST equipment failures in State.	Post the annual USTCA public record which will include: the number, sources, and causes of underground storage tank releases; the record of compliance by USTs; and data on the number of UST equipment failures in State.
			<i>Emergency Preparedness</i>	<i>Emergency Preparedness</i>
11	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	EPA will continue to work with Vermont on Homeland Security and emergency response readiness issues through routine, day-to-day coordination and the existing Regional Response Team mechanism. DEC will help EPA understand the role of other Vermont state and local agencies regarding emergency response readiness. This will be accomplished by facilitating meetings and using other mechanisms to introduce EPA emergency response staff and managers to their new Vermont counterparts.	EPA will continue to work with Vermont on Homeland Security and emergency response readiness issues through routine, day-to-day coordination and the existing Regional Response Team mechanism. DEC will help EPA understand the role of other Vermont state and local agencies regarding emergency response readiness. This will be accomplished by facilitating meetings and using other mechanisms to introduce EPA emergency response staff and managers to their new Vermont counterparts.
			<i>RCRA Training &amp; Meetings</i>	<i>RCRA Training &amp; Meetings</i>
12	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Attend EPA sponsored regional and national RCRA meetings and training as appropriate.	Attend EPA sponsored regional and national RCRA meetings and training as appropriate.
			<i>Corrective Action Sites</i>	<i>Corrective Action Sites</i>

13	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Achieve Human Exposures Controlled Under Current Conditions at zero (0) facilities. (CA1)	Achieve Human Exposures Controlled Under Current Conditions at zero (0) facilities. (CA1)
14	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Achieve Contaminated Ground Water Migration Under Control at zero (0) facilities. (CA2)	Achieve Contaminated Ground Water Migration Under Control at zero (0) facilities. (CA2)
15	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Achieve site-wide Remedy Selection at zero (0) facilities.	Achieve site-wide Remedy Selection at zero (0) facilities.
16	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Achieve Construction Complete at zero (0) facilities. (CA5)	Achieve Construction Complete at zero (0) facilities. (CA5)
17	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	New	Achieve Sitewide Ready For Anticipated Use (RAU) at zero (0) facilities.	Achieve Sitewide Ready For Anticipated Use (RAU) at one (1) facility.
18	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	New	Achieve performance standards attained or corrective action process terminated at one (1) facility (CA6)	Achieve performance standards attained or corrective action process terminated at one (1) facility (CA6)
19	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Same	Financial Assurance - verify adequacy/assess current status for sites where FA is required - Ensure RCRAinfo FA data is up-to-date and complete (incl. checking the FA audit report)	Financial Assurance - verify adequacy/assess current status for sites where FA is required - Ensure RCRAinfo FA data is up-to-date and complete (incl. checking the FA audit report)
			LUST	LUST
			<i>Not PPG eligible - funds are in separate LUST Trust Cooperative Agreement.</i>	<i>Not PPG eligible - funds are in separate LUST Trust Cooperative Agreement.</i>
20	Goal 1: Core Mission Objective 1.3: Revitalize Land & Prevent Contamination	Revised	Contribute to the national target for annual cleanups completed of releases from leaking underground storage tanks (LUSTs) (target is 11,200). Specific number of LUST cleanups completed for Vermont in FY20 will be negotiated separately. State will continue to collaborate with EPA on opportunities for additional LUST cleanups complete. (ACS Code: 112 / 1.3).	Contribute to the national target for annual cleanups completed of releases from leaking underground storage tanks (LUSTs) (target is 11,200). Specific number of LUST cleanups completed for Vermont in FY21 will be negotiated separately. State will continue to collaborate with EPA on opportunities for additional LUST cleanups complete. (ACS Code: 112 / 1.3).

No.	Strategic Linkage	New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
			<b>GOAL 6 - EVALUATION, REPORTING &amp; QUALITY ASSURANCE</b>	
			<i>Re-Opener Clause</i>	<i>Re-Opener Clause</i>
1	Goal 2: Cooperative Federalism Objective 2.1: Enhance Shared Accountability	Goal 3: Rule of Law & Process Objective 3.2: Create Consistency and Certainty	Same The Regional Office will strive to honor the spirit of the PPA. In keeping with this spirit the Region will work with EPA HQ to limit the impact of unexpected demands on the states. To address new, very high priority issues that might emerge a re-opener clause will be included as part of this process permitting the Regional Office and/or the state to introduce necessary changes to the PPA.	The Regional Office will strive to honor the spirit of the PPA. In keeping with this spirit the Region will work with EPA HQ to limit the impact of unexpected demands on the states. To address new, very high priority issues that might emerge a re-opener clause will be included as part of this process permitting the Regional Office and/or the state to introduce necessary changes to the PPA.
			<b>CLIMATE ADAPTATION</b>	<b>CLIMATE ADAPTATION</b>
2	Goal 2: Cooperative Federalism Objective 2.1: Enhance Shared Accountability	Goal 3: Rule of Law & Process Objective 3.2: Create Consistency and Certainty	Revised Participate in New England State and EPA quarterly calls to share actions on priority areas and implementation strategies.	Participate in New England State and EPA quarterly calls to share actions on priority areas and implementation strategies.
			<i>Performance Partnership</i>	<i>Performance Partnership</i>
3	Goal 2: Cooperative Federalism Objective 2.1: Enhance Shared Accountability	Goal 3: Rule of Law & Process Objective 3.2: Create Consistency and Certainty	Same A process for jointly evaluating and reporting progress and accomplishments under the workplan must be developed and described in the workplan. The process must be based on a negotiated schedule. (40CFR35.115).	A process for jointly evaluating and reporting progress and accomplishments under the workplan must be developed and described in the workplan. The process must be based on a negotiated schedule. (40CFR35.115).
4	Goal 2: Cooperative Federalism Objective 2.1: Enhance Shared Accountability	Goal 3: Rule of Law & Process Objective 3.2: Create Consistency and Certainty	Same An annual written progress report must be submitted within 90 days after the end of the annual grant period. (40CFR35.115, 40CFR31.40).	An annual written progress report must be submitted within 90 days after the end of the annual grant period. (40CFR35.115, 40CFR31.40).
			<i>QMP QAPP</i>	<i>QMP QAPP</i>
5	Goal 3: Rule of Law & Process Objective 3.3: Prioritize Robust Science		Same Continue to implement the State Quality Management Plan (QMP) and submit an Annual Quality System Status Report to the EPA NE Quality Assurance Unit documenting progress, activities, and status of the organization's quality system. The report will be submitted within 90 days of the end of the Federal Fiscal Year (by January 1st) and is comprised of three parts: Part A, Part B and Part C. Part A includes quality assessments conducted during the past year; identification of areas for improvement within the system; and descriptions, as applicable, of other relevant quality-related topics such as training, development of guidance, and best practices. Part B summarizes changes made to the QMP. Part C updates the State Quality Assurance Project Plan (QAPP) inventory list. This includes Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary data sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.	Continue to implement the State Quality Management Plan (QMP) and submit an Annual Quality System Status Report to the EPA NE Quality Assurance Unit documenting progress, activities, and status of the organization's quality system. The report will be submitted within 90 days of the end of the Federal Fiscal Year (by January 1st) and is comprised of three parts: Part A, Part B and Part C. Part A includes quality assessments conducted during the past year; identification of areas for improvement within the system; and descriptions, as applicable, of other relevant quality-related topics such as training, development of guidance, and best practices. Part B summarizes changes made to the QMP. Part C updates the State Quality Assurance Project Plan (QAPP) inventory list. This includes Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary data sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.
6	Goal 3: Rule of Law & Process Objective 3.3: Prioritize Robust Science		Same Maintain accreditation for the DEC laboratory and follow up promptly on any action items resulting from NELAP assessments of the laboratory.	Maintain accreditation for Vermont Agriculture and Environmental laboratory to support DEC laboratory needs and follow up promptly on any action items resulting from NELAP assessments of the laboratory.
7	Goal 3: Rule of Law & Process Objective 3.3: Prioritize Robust Science		Same Review the State QMP and summarize changes made to the QMP in Part B of the Annual Quality system Status Report.	Review the State QMP and summarize changes made to the QMP in Part B of the Annual Quality system Status Report.
8	Goal 3: Rule of Law & Process Objective 3.3: Prioritize Robust Science		Same Update the State Quality Assurance Quality Assurance Project Plan inventory list, in Part C of the Annual Quality System Status Report, with new and active QAPPs, including Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.	Update the State Quality Assurance Quality Assurance Project Plan inventory list, in Part C of the Annual Quality System Status Report, with new and active QAPPs, including Sampling and Analysis Plans/QAPP Addendums approved under generic Program QAPPs. All projects that involve environmental data produced from models, compiled from secondary sources such as databases or literature, or collected directly from measurements to describe environmental processes and conditions shall have approved Quality Assurance Project Plans before the initiation of any work.

No.	Strategic Linkage	New, Same, Revised	FY 2020 PPA Priorities & Commitments List	FY 2021 PPA Priorities & Commitments List
1	Goal 3: Rule of Law & Process Objective 3.1: Compliance with the Law	Same	Submit annual Compliance Plans containing descriptions of the state's, assistance and innovative programs, including projections for priority activities.	Submit annual Compliance Plans containing descriptions of the state's, assistance and innovative programs, including projections for priority activities.
2	Goal 3: Rule of Law & Process Objective 3.1: Compliance with the Law	Same	Submit annual End of Year report on Compliance monitoring and Enforcement accomplishments, activities and results.	Submit annual End of Year report on Compliance monitoring and Enforcement accomplishments, activities and results.
3	Goal 3: Rule of Law & Process Objective 3.1: Compliance with the Law	Same	Serve as an EPA contact for development of any plans for the state's assistance and innovation programs.	Serve as an EPA contact for development of any plans for the state's assistance and innovation programs.
4	Goal 3: Rule of Law & Process Objective 3.1: Compliance with the Law	Revised	<del>At end of year 2014, provide a discussion on any plans that might have developed under Item 137, or provide a negative declaration.</del>	<del>At end of year 2014, provide a discussion on any plans that might have developed under Item 137, or provide a negative declaration.</del>
5	Goal 3: Rule of Law & Process Objective 3.1: Compliance with the Law	Same	Identify/address/resolve HPVs in accordance with EPA's Timely and Appropriate Enforcement Response to High Priority Violators (the HPV policy), August 2014. Inform the EPA Region 1 liaison in person, by phone, or by email within 45 days of identifying/addressing/ resolving an HPV.	Identify/address/resolve HPVs in accordance with EPA's Timely and Appropriate Enforcement Response to High Priority Violators (the HPV policy), August 2014. Inform the EPA Region 1 liaison in person, by phone, or by email within 45 days of identifying/addressing/ resolving an HPV.
6	Goal 3: Rule of Law & Process Objective 3.1: Compliance with the Law	Same	Enter/send information necessary to satisfy the inspection, testing, compliance monitoring, and enforcement minimum data requirements (MDRs) to EPA's national data systems of record, every 60 days, or as specified in program guidance.  For a list of CAA required data elements, see <a href="http://www2.epa.gov/compliance/guidance-minimum-data-requirements-mdrs-caa-stationary-sources-compliance">http://www2.epa.gov/compliance/guidance-minimum-data-requirements-mdrs-caa-stationary-sources-compliance</a>  For a list of RCRA required data elements, see: <a href="https://www.epa.gov/compliance/guidance-rcrainfo-data-appendix-2003-enforcement-response-policy">https://www.epa.gov/compliance/guidance-rcrainfo-data-appendix-2003-enforcement-response-policy</a>  For a list of CWA required data elements, see: <a href="https://www.epa.gov/compliance/guidance-addendum-appendix-c-pcs-policy-statement-minimum-ins-and-data-elements">https://www.epa.gov/compliance/guidance-addendum-appendix-c-pcs-policy-statement-minimum-ins-and-data-elements</a>	Enter/send information necessary to satisfy the inspection, testing, compliance monitoring, and enforcement minimum data requirements (MDRs) to EPA's national data systems of record, every 60 days, or as specified in program guidance.  For a list of CAA required data elements, see <a href="http://www2.epa.gov/compliance/guidance-minimum-data-requirements-mdrs-caa-stationary-sources-compliance">http://www2.epa.gov/compliance/guidance-minimum-data-requirements-mdrs-caa-stationary-sources-compliance</a>  For a list of RCRA required data elements, see: <a href="https://www.epa.gov/compliance/guidance-rcrainfo-data-appendix-2003-enforcement-response-policy">https://www.epa.gov/compliance/guidance-rcrainfo-data-appendix-2003-enforcement-response-policy</a>  For a list of CWA required data elements, see: <a href="https://www.epa.gov/compliance/guidance-addendum-appendix-c-pcs-policy-statement-minimum-ins-and-data-elements">https://www.epa.gov/compliance/guidance-addendum-appendix-c-pcs-policy-statement-minimum-ins-and-data-elements</a>
7	Goal 3: Rule of Law & Process Objective 3.1: Compliance with the Law	Same	By November 30, complete the prior federal fiscal year annual end-of-year reporting on CAA, CWA and RCRA inspections agreed to under compliance monitoring strategies (CMS). Include reporting on alternative CMS plans, where applicable.	By November 30, complete the prior federal fiscal year annual end-of-year reporting on CAA, CWA and RCRA inspections agreed to under compliance monitoring strategies (CMS). Include reporting on alternative CMS plans, where applicable.

8	<p>Goal 3: Rule of Law &amp; Process Objective 3.1: Compliance with the Law</p>	Same	<p>As soon as possible in the year, but no later than July 30, submit a draft Alternative Compliance Monitoring Strategy for the upcoming fiscal year. This is only required if the state is seeking flexibility under an alternative CMS plan.</p> <p>By September 30, submit final Compliance Monitoring Plans for CAA, RCRA and CWA for the upcoming federal fiscal year, containing descriptions of the state's compliance program including projections for inspections and other priority activities. See the most recent OECA National Program Manager's Guidance Addendum and the CAA, CWA and RCRA Compliance Monitoring Strategies. The Compliance Monitoring Plans should be prepared and finalized by the start of the federal fiscal year.</p> <p><a href="https://www.epa.gov/compliance/compliance-monitoring-programs">https://www.epa.gov/compliance/compliance-monitoring-programs</a></p>	<p>As soon as possible in the year, but no later than July 30, submit a draft Alternative Compliance Monitoring Strategy for the upcoming fiscal year. This is only required if the state is seeking flexibility under an alternative CMS plan.</p> <p>By September 30, submit final Compliance Monitoring Plans for CAA, RCRA and CWA for the upcoming federal fiscal year, containing descriptions of the state's compliance program including projections for inspections and other priority activities. See the most recent OECA National Program Manager's Guidance Addendum and the CAA, CWA and RCRA Compliance Monitoring Strategies. The Compliance Monitoring Plans should be prepared and finalized by the start of the federal fiscal year.</p> <p><a href="https://www.epa.gov/compliance/compliance-monitoring-programs">https://www.epa.gov/compliance/compliance-monitoring-programs</a></p>
9	<p>Goal 3: Rule of Law &amp; Process Objective 3.1: Compliance with the Law</p>	Same	<p>By September 30 of each year, report on progress in addressing any recommendations identified by the State Review Framework (SRF). <a href="https://www.epa.gov/compliance/state-review-framework-compliance-and-enforcement-performance">https://www.epa.gov/compliance/state-review-framework-compliance-and-enforcement-performance</a></p>	<p>By September 30 of each year, report on progress in addressing any recommendations identified by the State Review Framework (SRF). <a href="https://www.epa.gov/compliance/state-review-framework-compliance-and-enforcement-performance">https://www.epa.gov/compliance/state-review-framework-compliance-and-enforcement-performance</a></p>

*Appendix B*

**Vermont Department of Environmental Conservation – 2018  
Mission Driven Priorities**

# DEC's Mission-Driven Priorities



## OUR WATER



Ensure safe, affordable and sustainable drinking water.



Protect, maintain, enhance and restore water quality in rivers, wetlands and lakes.



Manage Vermont's groundwater as a public resource for all.

## OUR LAND



Support the re-use and development of previously contaminated sites.



Minimize exposure to hazardous materials.



Increase recycling and diversion of waste from households and businesses.

## OUR AIR



Improve public health by reducing emission of air toxics.



Support climate policy with scientific analysis and timely emissions tracking.



Maintain and improve Vermont's air quality and increase visibility across our landscape.

## OUR COMMUNITIES



Provide financial, technical and planning assistance to help communities protect Vermont's land, air and water.



Support municipal investment in drinking water and wastewater infrastructure.



Increase community resilience with natural hazard prevention, planning and response.

## OUR CUSTOMERS



Help Vermonters understand the environmental impact of personal and community decisions through communications, assistance, and enforcement.



Deliver clear, fair, and predictable permitting decisions for applicants.



Provide accurate environmental information and data to educate, guide and engage Vermonters.