# *PERFORMANCE PARTNERSHIP AGREEMENT*

**between the**

**FLORIDA**
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**and the**

**U.S. ENVIRONMENTAL PROTECTION AGENCY,**
**REGION IV: SOUTHEAST**

**FEDERAL FISCAL YEARS 2021, 2022 AND 2023**

**August 1, 2020**

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## Statement of Purpose

The Florida Department of Environmental Protection (DEP) has entered the Performance Partnership Grant (PPG) with the Environmental Protection Agency (EPA) since federal fiscal year 2012. Based on the success of that effort, DEP is entering into a Performance Partnership Agreement (PPA) to further increase the efficiency and flexibility needed to accomplish Florida and federal environmental goals. This PPA complements the PPG process by serving as the work plan for EPA grants awarded to the state. The development of the performance partnerships simplifies grant administration, provides the opportunity to prioritize the use of these funds as set forth in the PPA, and allows for a reduction in the state and federal resources devoted to grant oversight, reporting, and administration.

This agreement covers a three-year period for federal fiscal years 2021, 2022 and 2023. Although the agreement will cover a three-year period, DEP will apply for its grants annually.

The focus of the PPA is the EPA/Florida Priorities and Commitment List (P&C List). DEP and EPA are committed to working together to develop a simplified P&C List that includes Florida, regional and national environmental priorities. The P&C List will be updated annually on an as-needed basis.

## Parties to the Agreement

The parties to the agreement will be the EPA and DEP. DEP will provide most of the resources necessary to carry out the agreement. EPA will provide resources to manage the agreement and the Performance Partnership Grant (PPG) from the federal point of view. It is anticipated that the agreement will provide the opportunity for DEP and EPA to work more closely and cooperatively to achieve the goals outlined within the agreement.

## Programs Covered by the Agreement

The following federal programs are covered by this agreement.

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

## Reporting

The PPA/PPG process is designed to reduce the level of EPA oversight and state reporting using mutually agreeable priorities and environmental indicators. DEP already submits a significant amount of information to EPA under national and regional reporting requirements. In addition, DEP will provide EPA with an end-of-year report and (as circumstances dictate) a mid-term report. The mid-year report will focus on those activities and performance measures where satisfactory progress has not been made and will include proposed changes needed to address these exceptions. The end-of-year report will be submitted by January following the end

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of each federal fiscal year for which this agreement is in place. This report will summarize progress and discuss any areas where DEP has failed to meet the established indicators or is experiencing difficulties in making the progress anticipated.

During the year, EPA's and DEP's representatives will communicate routinely regarding any areas of concern that have been raised by their respective staffs and/or to discuss issues that could affect the agreement.

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

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

If there are any conflicts between this agreement and the P&C List contained in Appendix A, this agreement will govern. Further, if needed, DEP and EPA will convene a PPA meeting to discuss any issues that have arisen as part of this review process. EPA and DEP will hold such a PPA meeting at least once in the three-year cycle of the PPA.

DEP will continue normal reporting of data to national databases, as well as continue required program reporting and enforcement related actions.

**Schedule of Reporting Dates and Milestones**

The dates below relate specifically to PPA reporting such as progress and accomplishment reporting. These dates do not replace or eliminate agreed-upon reporting and data submissions for specific commitments as outlined in the P&C List.

| DATE | MILESTONE |
|---|---|
| August 1, 2020 | Submit Draft of the FFY 2021 P&C List / PPG Application |
| November 1, 2020 | Submit finalized PPA |
| December 31, 2020 | Submit End-of-Year report for FFY 2020 PPA |
| April 1, 2021 | Begin FFY 2022 P&C List negotiations |
| May 30, 2021 | Submit Mid-Year report for FFY 2021 (if applicable) |
| August 1, 2021 | Submit Draft of the FFY 2022 P&C List / PPG Application |

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|---|---|
| November 1, 2021 | Submit finalized PPA |
| December 31, 2021 | Submit End-of-Year report for FFY 2021 PPA |
| April 1, 2022 | Begin FFY 2023 P&C List negotiations |
| May 30, 2022 | Submit Mid-Year report for FFY 2022 (if applicable) |
| August 1, 2022 | Submit Draft of the FFY 2023 P&C List / PPG Application |
| November 1, 2022 | Submit finalized PPA |
| December 31, 2022 | Submit End-of-Year report for FFY 2021 PPA |
| April 1, 2023 | Begin FFY 2024 P&C List negotiations |
| May 30, 2023 | Submit Mid-Year report for FFY 2023 (if applicable) |
| August 1, 2023 | Submit Draft of the FFY 2024 P&C List / PPG Application |

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**Reopening the Agreement**

Although the PPA has a three-year term, either EPA or DEP can request reopening the PPA by notifying the other party in writing at least 60 days in advance. In general, reopening the agreement will be limited to addressing major omissions, new or unanticipated requirements, sudden and significant changes in funding levels or available resources, resolving major legal proceedings, or any combination of these. DEP and EPA can annually renegotiate or update portions of the PPA on an as needed basis. If the adjustments are minor and are mutually agreeable, the PPA shall be revised or updated by written correspondence between the parties. If the adjustments are significant, then the parties will need to reopen the agreement.

**Dispute Resolution**

DEP and EPA agree that the following process will be used to resolve any disputes that cannot be settled by consensus agreement, although both parties agree that every effort will be made to resolve all issues in a timely fashion without resorting to this process.

1. The dispute shall be defined in writing by both parties, with the issues and obstacles clearly stated by both parties.
2. Written disputes shall be submitted to the DEP Deputy Secretary and the EPA's Senior Program Manager for Region IV.
3. The above parties shall discuss the dispute and attempt to reach a decision within two weeks of the submission.
4. If agreement cannot be reached at this level within the two-week timeframe, the dispute shall be raised to a higher level in each organization following the same process.

**Comparison of Florida Department and Division Programs with EPA Strategic Plan Goals**

| Grant | DEP Division/Office | DEP Program | EPA Strategic Goals *FY 2011-2015 EPA Strategic Plan* | EPA Objectives *FY 2011-2015 EPA Strategic Plan* |
|---|---|---|---|---|
| CAA (Section 105) | • Division of Air Resource Management<br>• Regulatory District Offices | • Air Resource Management<br>• Compliance Assurance | • Goal 1: Addressing Climate Change and Improving Air Quality<br>• Goal 5: Enforcing Environmental Laws | • Objective 1.2: Improve Air Quality<br>• Objective 5.1: Enforce Environmental Laws |
| RCRA | • Division of Waste Management<br>• Regulatory District Offices | • Hazardous Waste<br>• Compliance Assurance | • Goal 3: Cleaning up Communities & Advancing Sustainable Development<br>• Goal 5: Enforcing Environmental Laws | • Objective 3.2: Preserve Land<br>• Objective 3.3: Restore Land<br>• Objective 5.1: Enforce Environmental Laws |
| UIC | • Division of Water Resource Management<br>• Regulatory District Offices | • Underground Injection Control<br>• Compliance Assurance | • Goal 2: Protecting America's Waters | • Objective 2.1: Protect Human Health |
| PWSS (Drinking Water) | • Division of Water Resource Management<br>• Regulatory District Offices | • Drinking Water<br>• Compliance Assurance | • Goal 2: Protecting America's Waters<br>• Goal 5: Enforcing Environmental Laws | • Objective 2.1: Protect Human Health<br>• Objective 5.1: Enforce Environmental Laws |
| CWA (Section 106) | • Division of Water Resource Management<br>• Division of Environmental Restoration & Assessment<br>• Office of Water Policy<br>• Regulatory District Offices | • Assessment<br>• Groundwater<br>• Monitoring<br>• NPDES Permitting<br>• Stormwater<br>• Total Maximum Daily Loads (TMDL)<br>• Watershed Protection<br>• Water Quality Standards<br>• Enforcement<br>• Compliance Assurance | • Goal 2: Protecting America's Waters<br>• Goal 5: Enforcing Environmental Laws | • Objective 2.2: Protect and Restore Watersheds and Aquatic Ecosystems<br>• Objective 5.1: Enforce Environmental Laws |

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# APPENDICES

Appendix A: EPA/DEP Priorities and Commitment List

Appendix B: EPA/DEP Priorities and Commitment List Contacts

Appendix C: LOS Work Plan

Appendix D: LOS Compliance/RCRA Permitting and Corrective Action
LOS WP Compliance

Appendix E: General PPA Information

Appendix F: DEP Strategic Priorities

Appendix G: DEP Demonstration of Quality Assurance Competency Letter and Attachments

Appendix H: Acronyms

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**Signature Page**

The Florida Department of Environmental Protection and USEPA Region IV are pleased to enter into this FFY 2021-2023 Environmental Performance Partnership Agreement. This agreement continues our efforts to establish more effective working relationships between DEP and EPA.

For the Florida Department of Environmental Protection

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Deputy Secretary, Regulatory Programs Date Signed

For USEPA Region IV: Southeast

_____ _____

Regional Administrator Date Signed

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# APPENDIX A

## EPA/FLORIDA PRIORITIES AND COMMITMENT LIST

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# APPENDIX B

## EPA/FLORIDA PRIORITIES AND COMMITMENT LIST CONTACTS

| | DEP Contact | | EPA Contact |
|---|---|---|---|
| **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | |
| ***Objective 1.1: Improve Air Quality*** | | | |
| **CAA** | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | • *Implement the NAAQS*<br>• *Delegation and Implementation* | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov |
| | Syed Arif<br>850-717-9039<br>Syed.Arif@dep.state.fl.us | • *Implement NSR Programs*<br>• *Air Toxics: MACT Standards* | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov |
| | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@dep.state.fl.us | • *Ambient Air Monitoring*<br>• *Reduce Air Toxics* | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov |
| **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | |
| ***Objective 1.2: Provide for Clean and Safe Water*** | | | |
| **UIC** | Cindy Fischler<br>850-245-8658<br>Cindy.Fischler@floridadep.gov | • *Underground Injection Control* | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov |
| **PWSS** | Jamie Shakar<br>850-245-8626<br>Jamie.Shakar@floridadep.gov | • *Source and Drinking Water* | Allison Humphris<br>404-562-9305<br>Humphris.Allison@epa.gov |
| **106** | Mary K. Smith<br>850-245-8591<br>Mary.K.Smith@floridadep.gov | • *NPDES CAFO* | Tara Houda<br>404-562-9762<br>Houda.Tara@epa.gov |
| | Nancy Ross<br>850-245-8649<br>Nancy.Ross@floridadep.gov | • *DWP - Whole Effluent Toxicity* | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov |
| | Marc Harris<br>850-245-8590<br>Marc.Harris@floridadep.gov<br>Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov | • *DWP - Publicly Owned Treatment Works* | Tara Houda<br>404-562-9762<br>Houda.Tara@epa.gov |
| | Borja Crane-Amores<br>850-245-7520<br>Borja.CraneAmores@floridadep.gov | • *NPDES Stormwater* | Mike Mitchell<br>404-562-9303<br>Mitchell.Michael@epa.gov |
| | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us<br>Denise Miller | • *Monitoring Program* | Chris McArthur<br>404- 562-9391<br>mcarthur.christopher@epa.gov |

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|---|---|---|---|
| | 850-245-8516<br>Denise.Miller@dep.state.fl.us<br>Jay Silvanima<br>850-245-8512<br>James.Silvanima@dep.state.fl.us | | |
| **106** | Erin Rasnake<br>850-245-8338<br>Erin.Rasnake@dep.state.fl.us | ● *303(d) TMDL Program* | Laila Hudda<br>404-562-9007<br>Hudda.Laila@epa.gov |
| **106** | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us<br><br>Kevin O'Donnell<br>850-245-8469<br>Kevin.ODonnell@dep.state.fl.us<br><br>Ansel Bubel<br>850-245-8072<br>Ansel.Bubel@dep.state.fl.us | ● *303(d) TMDL Program: State Prioritization Framework*<br>● *303(d) TMDL Program: TMDL Alternatives* | Laila Hudda<br>404-562-9007<br>Hudda.Laila@epa.gov |
| | Kevin Coyne<br>850-245-8555<br>Kevin.Coyne@dep.state.fl.us | ● *305(b)/303(d) Assessment Program: BMAP & Restoration Effectiveness* | Catherine York<br>404-562-8065<br>York.Catherine@epa.gov |
| | Julie Espy<br>850-245-8416,<br>Julie.Espy@dep.state.fl.us<br><br>Kevin O'Donnell<br>850-245-8469<br>Kevin.Odonnell@dep.state.fl.us | ● *305(b)/303(d) Assessment Program* | Catherine York<br>404-562-8065<br>York.Catherine@epa.gov |
| | Marc Harris<br>850-245-8590<br>Marc.Harris@floridadep.gov<br>Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov | ● *NPDES Permitting* | Bridget Staples<br>404-562-9783<br>Staples.Bridget@epa.gov |
| | Jamie Shakar<br>850-245-8626<br>Jamie.Shakar@floridadep.gov<br>Cindy Fischler<br>850-245-8658<br>Cindy.Fischler@floridadep.gov | ● *Groundwater Program* | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov |
| | Jay Silvanima,<br>850-245-8507<br>James.Silvanima@dep.state.fl.us | ● *Groundwater Program: Monitoring Network* | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov |
| | Jamie Shakar<br>850-245-8626<br>Jamie.Shakar@floridadep.gov | ● *Source Water Protection* | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov |

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|---|---|---|---|
| | Kevin Coyne<br>850-245-8555<br>Kevin.Coyne@dep.state.fl.us | • *Watershed Protection* | Tiana Blount<br>404-562-9219<br>Blount.Tiana@epa.gov |
| | Daryll Joyner<br>850-245-8431<br>Daryll.Joyner@dep.state.fl.us<br>Ken Weaver<br>850-245-8414<br>Kenneth.Weaver@dep.state.fl.us | • *Water Quality Standards Program* | Katherine Snyder<br>404-562-9840<br>Snyder.katherine@epa.gov |
| **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | |
| ***Objective 1.3: Revitalize Land and Prevent Contamination*** | | | |
| **RCRA** | Michell Smith<br>850-245-8721<br>Michell.M.Smith@dep.state.fl.us | • *RCRA Authorizations*<br>• *RCRA Training and Meetings* | Dee Rodgers-Smith<br>404-562-8688<br>Rodgers-Smith.Delores@epa.gov |
| **RCRA** | Michell Smith<br>850-245-8721<br>Michell.M.Smith@dep.state.fl.us | • *Permit Renewals* | Dee Rodgers-Smith<br>404-562-8688<br>Rodgers-Smith.Delores@epa.gov |
| **RCRA** | Michell Smith<br>850-245-8721<br>Michell.M.Smith@dep.state.fl.us | • *Corrective Action: Environmental Indicators* | Keriema Newman<br>404-562-8859<br>Newman.Keriema@epa.gov |
| **GOAL 3: GREATER CERTAINTY, COMPLIANCE, and EFFECTIVENESS** | | | |
| ***Objective 3.1: Compliance with the Law*** | | | |
| **CAA** | Syed Arif<br>850-717-9039<br>Syed.Arif@dep.state.fl.us | • *Asbestos*<br>• *CAA - Compliance & Enforcement* | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov |
| **CAA** | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | • *Emission Inventories*<br>• *Air Planning* | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov |
| **RCRA** | Kim Walker<br>850-245-8790<br>kim.walker@dep.state.fl.us | • *RCRA Coordination* | Dee Rodgers-Smith<br>404-562-8688<br>Rodgers-Smith.Delores@epa.gov |
| **RCRA** | Glen Perrigan<br>850-245-8749<br>Glen.Perrigan@dep.state.fl.us | • *RCRA - Compliance & Enforcement* | Larry Lamberth<br>404-562-8590<br>Lamberth.Larry@epa.gov |
| **RCRA** | Tim Bahr<br>850-245-8709<br>tim.bahr@dep.state.fl.us | • *Waste Application Enhancements (State Priorities)* | Larry Lamberth<br>404-562-8590<br>Lamberth.Larry@epa.gov |
| **PWSS** | Jamie Shakar<br>850-245-8626<br>Jamie.Shakar@floridadep.gov | • *PWSS - Compliance & Enforcement* | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov |

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|---|---|---|---|
| | Dan P. Willis<br>850-245-8344<br>Dan.P.Willis@floridadep.gov | ● *PWSS Application Enhancements (State Priorities)* | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov |
| **106** | Jennifer Walters<br>850-245-7640<br>Jennnifer.Walters@floridadep.gov<br>Leo Garcia<br>850-245-8584<br>Leandro.Garcia@floridadep.gov | ● *106 Compliance Assurance* | Tara Houda<br>404-562-9762<br>Houda.Tara@epa.gov |
| **EVALUATION, REPORTING & QUALITY ASSURANCE** | | | |
| **106** | Jese Madden<br>850-245-8342<br>Jessica.S.Madden@dep.state.fl.us<br><br>Nia Wellendorf<br>850-245-8190<br>Nijole.Wellendorf@FloridaDEP.gov | ● *303(d) TMDL Program*<br>● *305(b)/303(d) Assessment Program*<br>● *Monitoring Program: Joint Evaluation/ Progress Report*<br>● *Water Quality Standards Program* | Jennifer Shadle<br>404-562-9436<br>Shadle.Jennifer@epa.gov |
| | Julie Espy<br>850-245-8416,<br>Julie.Espy@dep.state.fl.us<br><br>Kevin O'Donnell<br>850-245-8469<br>Kevin.Odonnell@dep.state.fl.us | ● *305(b)/303(d) Assessment Program: Reporting (ADB)*<br>● *305(b)/303(d) Assessment Program: State's Evaluation* | Catherine York<br>404-562-8065<br>York.Catherine@epa.gov |

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# APPENDIX C

## LOS WORK PLAN

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# APPENDIX D

## LOS COMPLIANCE/RCRA PERMITTING AND CORRECTIVE ACTION WORK PLAN (FY2019 RCRA Workplan Final)

## LOS WP COMPLIANCE

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# APPENDIX E

## PPA GENERAL INFORMATION

Since 1995, the EPA and states have been working under a performance-based system of environmental protection designed to improve the efficiency and effectiveness of state-EPA partnerships. By focusing EPA and state resources on the most pressing environmental problems and taking advantage of the unique capacities of each partner, performance partnerships can help achieve the greatest environmental and human health protection. The Florida Department of Environmental Protection (DEP) Performance Partnership Agreement (PPA) is an example of this state-EPA partnership.

The PPA is an agreement between the DEP and the EPA Region 4 which documents the work that DEP will perform under a specific group of federal grants, and serves as a joint DEP/EPA planning, program coordination and grant support tool. The federal grants for the programs included in the PPA are combined into a single federal grant: The Performance Partnership Grant (PPG). By bundling the separate grants into a single award, DEP has more flexibility in allocating the grant funds, and it reduces duplicative administrative requirements. The PPA is not intended to document all programs, issues, and projects that either DEP or EPA are working to accomplish. The PPA, and especially its major component the Priorities and Commitment List (P&C List), reflects a critical distillation of broad national program guidance from the EPA as determined by the EPA Region 4. The PPA reflects the most important elements of work funded by the EPA through the PPA/PPG. A significant percentage of the work done by DEP is not funded by the above grants and is not included in the P&C List.

The PPA has a three-year term. The current PPA entered between DEP and the EPA began October 1, 2018 (the beginning of the federal fiscal year) and continues until September 30, 2020 (the end of the federal fiscal year). This PPA corresponds to the federal fiscal years 2018-2020. The PPA is updated as needed to incorporate any changes that have occurred, or are anticipated.

A major component of the PPA is the P&C List, which is typically developed at the federal level by National Program Managers. The EPA regional offices receive the priorities and then determine how to implement them in each state. The P&C List for DEP is then developed annually in coordination with the EPA Region 4. The P&C List does not include all the work done by DEP, only the work funded by the PPG. DEP has other sources of funding (such as EPA grants not included in the PPG, permit fees and state funding) that are not related to the PPA. These other sources of funding have their own requirements and are not documented in the PPA.

In addition, DEP agrees to provide EPA Region 4 with a mid-year report, as required, and an end of year report that documents progress for the P&C List tasks. These progress reports are in addition to specific reports that a program may be required to provide to the EPA as documented in the P&C List. Many programs are also required to provide the EPA with data that is entered into national databases.

The appendices to the PPA include the P&C List, P&C List Contacts, Level of Service Workplan, Level of Service Compliance/RCRA Permitting, DEP Strategic Priorities, List of Acronyms, and the DEP Demonstration of Quality Assurance Competency Letter and Attachments developed to ensure the quality of the data collected for projects funded by federal grants.

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# APPENDIX F

## DEP STRATEGIC PRIORITIES

The Florida Department of Environmental Protection's vision is to create strong community partnerships, safeguard Florida's natural resources and enhance its ecosystems.

To achieve this vision, six strategic goals have been developed. They are:

1). Focus taxpayer resources on projects that provide a direct benefit to the environment and local communities;

2). Establish and consistently use clear metrics to evaluate and strengthen DEP's programs, activities and services;

3). Partner with communities and businesses to protect natural resources and promote economic growth.

4). Improve the quality of natural resources through long-term planning, restoration and maintenance;

5). Empower employees to solve problems through innovation and efficiency; and,

6). Proactively communicate a clear and consistent message both internally and externally.

The department's Regulatory arm will continue its priority of providing "Regulatory Consistency" and has implemented a number of cross-media improvements. These include:

a) Breaking down the silos in DEP's compliance and enforcement programs by combining the programs organizationally;
b) Establishment of a high-level management position within each District Office (referred to as the Assistant Director), responsible for all media compliance and enforcement in the region of the State covered by the District Office;
c) Implementation of bi-weekly coordination meetings between each Assistant Director to enhance regulatory consistency across all regions of the State;
d) Standardizing DEP's compliance and enforcement guidelines across each and every media; and
e) Development of a career path for all permit writers and inspectors including cross-media training requirements.

The above enhancements have allowed DEP to replicate its best practices across all media. Additionally, these changes have brought attention to a major opportunity for step-change improvements in regulatory consistency by better leveraging IT resources to modernize our electronic compliance and enforcement databases and field inspection tools.

The Air program has implemented "AirCom," a statewide compliance and enforcement database application used to record compliance and enforcement activities. The system was designed to modernize, enhance and consolidate existing compliance and enforcement applications to meet federal reporting requirements by implementing business rules to improve data quality, support data evaluation and provide robust reporting capabilities. Replication of AirCom within the Hazardous Waste and Drinking Water programs will allow for similar improvements and successes, as well as measurable efficiencies following implementation. DEP has included these proposed projects as new stand-alone commitments within the Priorities & Commitments List. The projects will be staffed and funded via a shifting of resources within the Priorities and Commitment List as negotiated with the EPA.

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# APPENDIX G

## DEP Demonstration of Quality Assurance Competency Letter and Attachments

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# APPENDIX H

## ACRONYMS

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| **ACTS/NARS** | Asbestos Contractor Tracking System/National Asbestos Registry System |
| **ADB** | Assessment Database |
| **AERR** | Air Emissions Reporting Requirements |
| **AFO** | Animal Feeding Operation |
| **AFS** | Air Facility System |
| **ANCR** | Annual Noncompliance Report |
| **AO** | Administrative Order |
| **AOC** | Abnormal Operating Conditions |
| **APP** | Aquifer Protection Program |
| **AQI** | Air Quality Index |
| **AQS** | Air Quality Systems |
| **ARMS** | Air Resource Management System |
| **ASDWA** | Association of State Drinking Water Administrators |
| **AU** | Assessment Unit |
| **AWOP** | Area Wide Optimization Program |
| **BACT** | Best Achievable Control Technology |
| **BMAP(s)** | Basin Management Action Plan(s) |
| **CAA** | Clean Air Act |
| **CAFO(s)** | Concentrated Animal Feeding Operation(s) |
| **CAP** | Criteria Air Pollutants |
| **CD** | Capacity Development |
| **CERCLA** | Comprehensive Environmental Response, Compensation, and Liability Act |
| **CESQG** | Conditionally Exempt Small Quantity Generator |
| **CFR** | Code of Federal Regulations |
| **CME** | Comprehensive Monitoring Evaluation |
| **CMS** | Compliance Monitoring Strategy |
| **CSO** | Combined Sewer Overflow |
| **CWA** | Clean Water Act |
| **CWS** | Community Water Systems |
| **DEAR** | Division of Environmental Assessment and Restoration |
| **DMR** | Discharge Monitoring Report |
| **DWP** | Domestic Wastewater Program |
| **DWRM** | Division of Water Resource Management |
| **EI** | Environmental Indicators |
| **EIS** | Emissions Inventory System |
| **EMS** | Enforcement Management Strategy |
| **EPA** | U.S. Environmental Protection Agency |

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| **ERC** | Environmental Resource Commission |
| **ERP** | Emergency Response Plan |
| **ETT** | Enforcement Targeting Tool |
| **FAC** | Florida Administrative Code |
| **FDACS** | Florida Department of Agriculture and Consumer Services |
| **FDEP** | Florida Department of Environmental Protection |
| **FDOH** | Florida Department of Health |
| **FFY** | Federal Fiscal Year |
| **FL** | Florida |
| **FLUWID** | Florida Unique Well Identification Program |
| **FSR** | Financial Status Report |
| **FWL** | Facilities Watch List |
| **FY** | Fiscal Year |
| **GIS** | Geographic Information System |
| **GP** | General (Generic) Permits |
| **gpd** | Gallons per Day |
| **GPRA** | Government Performance Results Act |
| **GRTS** | Grants Report Tracking System |
| **HQ** | Headquarters |
| **ICIS** | Integrated Compliance Information System |
| **IR** | Integrated Report |
| **IU** | Industrial User |
| **IWP** | Industrial Wastewater Program |
| **LAER** | Lowest Achievable Emission Rate |
| **LQG** | Large Quantity Generator |
| **MACT** | Maximum Advanced Control Technology |
| **MOA** | Memorandum of Agreement |
| **MS4** | Municipal Separate Storm Sewer System |
| **MSAs** | Metropolitan Statistical Areas |
| **NAAQS** | National Ambient Air Quality Standards |
| **NATA** | National Air Toxics Assessment |
| **NATTS** | National Air Toxics Trends Site |
| **NCAPS** | National Corrective Action Prioritization System |
| **NEI** | National Emissions Inventory |
| **NESHAP** | National Emissions Standards for Hazardous Air Pollutants |
| **NHD** | National Hydrography Database |
| **NNC** | Numeric Nutrient Criteria |
| **NOD** | Notice of Deficiency |
| **NOI** | Notice of Intent |
| **NOV** | Notice of Violation |
| **NPDES** | National Pollutant Discharge Elimination System |
| **NPS** | National Pretreatment Standards |
| **NSPS** | New Source Performance Standards |
| **NSR/PSD** | New Source Review/Prevention of Significant Deterioration |
| **O&M** | Operation and Maintenance |
| **OSHA** | Occupational Safety and Health Administration |

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|---|---|
| **CI** | Pretreatment Compliance Inspection |
| **$PM_{2.5}$** | Particulate Matter (2.5 microns or smaller in diameter) |
| **PMOS** | Permit Management Oversight System |
| **POTW** | Publicly Owned Treatment Works |
| **PTC** | Pretreatment Coordinator |
| **PWSS** | Public Water System Supervision |
| **QA/QC** | Quality Assurance/Quality Control |
| **QAPP(s)** | Quality Assurance Project Plan(s) |
| **QMP** | Quality Management Plan |
| **QNCR** | Quarterly Noncompliance Report |
| **QR** | Quarterly Report |
| **R4** | Region 4 |
| **RACT** | Reasonably Achievable Control Technology |
| **RBLC** | RACT/BACT/LAER Clearinghouse |
| **RCRA** | Resource Conservation and Recovery Act |
| **RCRAInfo** | Resource Conservation and Recovery Act Information database |
| **RIDE** | Requisite ICIS Data Elements |
| **RNC** | Reportable Non-Compliance |
| **SDWA** | Safe Drinking Water Act |
| **SDWIS/FED** | Safe Drinking Water Information System/Federal |
| **SDWP** | Source and Drinking Water Program |
| **SEV** | Single Event Violations |
| **SIP** | State Implementation Plan |
| **SIU** | Significant Industrial User |
| **SLAMS** | State & Local Air Monitoring Station |
| **SNC** | Significant Non-Compliance |
| **SOP** | Standard Operating Procedures |
| **SPMs** | Special Purpose Monitors |
| **SQG** | Small Quantity Generator |
| **SSAC** | Site Specific Alternative Criteria |
| **SSO** | Sanitary Sewer Overflow |
| **STORET** | Storage and Retrieval Systems |
| **SW** | Stormwater |
| **SWAPP** | Source Water Assessment and Protection Program |
| **TIE/TRE** | Toxicity Identification Evaluation/Toxicity Reduction Evaluation |
| **TMDL** | Total Maximum Daily Load |
| **TSD** | Treatment, Storage, and Disposal |
| **UCMR** | Unregulated Contaminant Monitoring Rule |
| **UIC** | Underground Injection Control |
| **USGS** | U.S. Geological Survey |
| **WENDB** | Water Enforcement National Database |
| **WET** | Whole Effluent Toxicity |
| **WQBEL** | Water Quality Based Effluent Limitations |
| **WQS** | Water Quality Standards |
| **WQX** | Water Quality Exchange |
| **WWTP** | Wastewater Treatment Plant |

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| Grant | Program | Division | FFY 2020 Task No. | DEP 2020 PPA Priorities & Commitments List | Schedule/ Due Date | Florida DEP August 2019 Proposed Changes | EPA Comment | DEP Contact | EPA Contact | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | | | | |
| | | | | **Objective 1.1: Improve Air Quality** | | | | | | |
| | | | | ***Implement the NAAQS - Some P&C's were deleted or moved to Appendix C*** | | | | | | |
| CAA | B&D | DARM | IAQ-1 | As appropriate, address any area violating the PM2.5 NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office through the reporting database. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-2 | As appropriate, address any area violating the 8-hr Ozone NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office through the reporting database. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-3 | As appropriate, address any area violating the 2008 Lead NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office through the reporting database. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-4 | As appropriate, address any area violating the other NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office through the reporting database. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-5 | For any area where modeling of actual SO2 emissions serve as the basis for designating such area as attainment for the 2010 SO2 NAAQS, the air agency shall submit an annual report to the EPA Regional Administrator by July 1 of each year, either as a stand-alone document made available for public inspection, or as an appendix to its Annual Monitoring Network Plan (also due on July 1 each year under 40 CFR 58.10), that documents the annual SO2 emissions of each applicable source in each such area and provides an assessment of the cause of any emissions increase from the previous year. | Submittal consistent with timeframes specified in EPA's Data Requirements Rule for the 2010 SO2 NAAQS | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-6 | Continue to develop and implement standards, plans, strategies, and actions to preserve air quality in attainment areas and prevent further degradation in areas with the potential to be designated nonattainment in the future. Continue screening of monitoring data for early indication of nonattainment. For areas that violate after the designation, work with Region 4 to develop a plan to expeditiously bring each area back into attainment. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-7 | Consistent with the national allocation of section 105 grant resources and the states' and locals' voluntary withholding of 105 grant resources for special projects, continue developing regional planning capabilities for National Ambient Air Quality Standards (NAAQS) and regional haze, including emission inventory development, building air quality modeling capacity, other technical analyses and collaboration with other agencies. The state and local contact or section chief in the Air Regulatory Management Section should be notified, at the mid-year point and a month prior to the end of the grant period, via e-mail of how the state or local agency is meeting this grant condition, specifying applicable specific grants or programs. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| | | | | ***Implement NSR Programs*** | | | | | | |
| CAA | P&C | DARM | IAQ-8 | Issue major NSR/Prevention of Significant Deterioration (PSD) permits and minor source permits that comply with CAA requirements and enter Best Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) determinations for major sources in the Reasonably Available Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC). | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | IAQ-9 | Upon receipt of an NSR/PSD permit application for a major source, submit a copy to EPA. If your agency has a completeness determination process, notify EPA when each NSR/PSD permit application is deemed complete. Upon public notice of a draft NSR/PSD permit for a major new source or modification, submit a copy to EPA of any documents relevant to the preliminary determination and draft NSR/PSD permit. Upon issuance of a final major source permit, submit a copy to EPA of any documents relevant to the final determination and final permit. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| | | | | ***Ambient Air Monitoring - Some P&C's were deleted or moved to Appendix C or Appendix D*** | | | | | | |
| CAA | AM | DARM | IAQ-10 | Operate all criteria pollutant monitors and perform requisite data review and quality assurance/quality control elements in compliance with the requirements of the CFR and other applicable federal policy and guidance. This commitment includes all reporting and data certification requirements (e.g., annual State and Local Air Monitoring Station (SLAMS) reports and data certifications due by May 1 each year). | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-11 | The agency will collect strip chart data or its electronic equivalent for quality assurance purposes. Electronic strip chart data must be collected on a 1-minute timeframe or less. This data must be retained for a minimum of three (3) complete monitoring years. | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-12 | Develop and submit for approval a statewide ambient monitoring network plan. The network plan should be consistent with requirements outlined in 40 CFR Parts 50, 53, and 58. Local Agencies will coordinate with the State in the development of this plan. The annual network plan is to be submitted on or by July 1 of each year incorporating any changes, real or proposed. Include in the annual ambient monitoring network design plan a certified evaluation of the Agency's ambient monitors and auxiliary support equipment and categorize the condition of the equipment as "Good," "Fair," or "Poor." Please indicate which equipment pieces are not in everyday use (e.g., spare/back-up equipment stored in a lab or warehouse.) Auxiliary equipment includes items such as calibrators, data loggers, meteorological equipment, modems, etc. The agency is requested to replace equipment categorized as "Poor." | Annually - July 1st | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-13 | Maintain an approved quality management plan (QMP) for activities involving the collection and use of air quality environmental data. The QMP will be submitted at least 180 days prior to the expiration of the current QMP electronically to R4QMP@epa.gov or in hard copy to: EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, GA 30605, Attn: Regional Quality Assurance Manager. QMPs must address EPA Requirements for Quality Management Plans (EPA QA/R-2, http://www.epa.gov/quality/qsdocs/r2-final.pdf). Six months prior to expiration of QMP and QAPPs, states submit an updated QMP or QAPP for review and approval. This time frame was discussed at the recent meeting with the state air directors. This time frame is intended to provide enough time for all documents to be reviewed and approved prior to expiration of the plans that are in place. | 180 days prior to expiration of QMP and QAPPs | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-14 | For all new pollutants to be monitored and methods to be used, a quality assurance project plan (QAPP) must be submitted for approval 180 days prior to collection of environmental data. Electronic copies may be submitted to R4airqa@epa.gov and hard copies to: EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, GA 30605, Attn: Quality Assurance Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf). | 180 days prior to collection of new environmental data | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-15 | Maintain an approved quality assurance project plan (QAPP) for the criteria pollutant network. QAPPs will be reviewed and submitted for approval in accordance with the following: 1. QAPPs will be reviewed annually by each agency. The review will be documented in an email to R4airqa@epa.gov The email should state the date of the review and whether the QAPP is adequate as written or requires changes. If revised, the QAPP will be submitted to EPA for approval within 180 days following the date of the email.<br>2. QAPPs expire every five (5) years and thus will be reviewed, revised and submitted to EPA for approval 180 days prior to expiration of the current QAPP.<br>3. Submit standard operating procedures (SOPs) associated with the QAPPs. SOPs will be referenced during the QAPP review; however, SOPs will not be reviewed or approved.<br>Electronic copies may be submitted to R4airqa@epa.gov and hard copies to: EPA Region 4, Laboratory Services and Applied Science Division, Athens, GA 30605, Attn: Superfund and Air Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf. | 180 days prior to expiration of QMP and QAPPs | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-16 | Maintain up-to-date standard operating procedures (SOPs) for instrumentation and quality system processes (e.g., data handling and validation, document control, etc.) in support of criteria pollutant monitoring activities, and as appropriate any air toxics monitoring activities conducted by your agency. SOPs for newly acquired instrumentation should be developed within 180 days from the startup of the equipment. Please submit courtesy copies of all SOPs either electronically at R4AirQA@epa.gov or by mail to EPA Region 4, Labratory Services and Applied Science Division, 980 College Station Road, Athens, Georgia 30605, attn: Quality Assurance Section Chief. | No later than 180 days from the startup of newly acquired equipment | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-17 | For all SLAMS and SPMs meeting the requirements of 40 CFR 58, notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutants, including PM2.5. For the 8 hour ozone NAAQS, report all 4th maximum concentrations that are at or above the level of the standard (agencies meet this commitment for monitors whose data are reported to AIRNow). | No later than 30 days after determination of exceedance/violation | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>(404) 562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-18 | Comply with the requirements in 40 CFR Section 50.14 regarding treatment of data influenced by exceptional events. (Note: EPA Region 4 will neither review nor concur on either State or Local requests to exclude data unless the State is in compliance with the appropriate requirements.) | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-19 | In conjunction with the AQI, State Agencies are encouraged to submit an Air Quality Forecast for MSAs greater than 350,000 people to the EPA AIRNow Web site. The Air Quality Forecast should be submitted daily to the AIRNow Web site before 3:55 p.m. EDT. The Air Quality Forecast, like the AQI, will be based on the primary criteria pollutant. Unlike the AQI, an index value is not required to be reported as a forecast. Instead of the index value, the AQI descriptor value of Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, or Very Unhealthy should be used. | Daily before 3:55 pm | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-20 | Support staff participation at the following meetings:<br>A.The annual Region 4 Ambient Air Monitoring WorkShop; and<br>B.The National Ambient Air Monitoring Conference. | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-21 | SLAMS data for each criteria pollutant monitor must be at a minimum 75% complete on a quarterly and annual basis. Additionally, ozone data must be 90% or more complete on a three year average basis. Notify EPA immediately if a problem arises that will prevent the agency from meeting a data completeness requirement for any pollutant. Provide reasons why the data completeness requirement will not be met, a schedule for correcting the problem, and corrective actions that will be taken to avert the problem from recurring. Notify EPA by mail or e-mail no more than 90 days after the end of the quarter of any monitor not meeting the 75% data recovery requirement. Data recovery may become part of a regional/national statistical report published by EPA. | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-22 | As part of the QA competency demonstration submittal (Reporting Requirement 19-14) that your agency submits to EPA with its annual grant application package, provide a listing of all QA documents (QMPs, QAPPs, and SOPs) for the criteria pollutants network maintained by your agency, and the date that each document was most recently revised and approved (EPA approval only required for QMPs and QAPPs). | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-23 | Collect ambient air quality data for toxics from monitoring sites as appropriate for special studies funded under this agreement. Include any planned air toxics monitoring in the ambient monitoring network design plan that is submitted to EPA in July annually. If no monitoring is planned, respond to this commitment by stating, "No air toxics monitoring will be performed." | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-24 | Maintain an approved quality assurance project plan (QAPP) for the air toxics network. QAPPs will be reviewed and submitted for approval in accordance with the following:<br>1. QAPPs will be reviewed annually by each agency. The review will be documented in an email to R4airqa@epa.gov. The email should state the date of the review and whether the QAPP is adequate as written or requires changes. If revised, the QAPP will be submitted to EPA for approval within 180 days following the date of the email.<br>2. QAPPs expire every five (5) years and thus will be reviewed, revised and submitted to EPA for approval 180 days prior to expiration of the current QAPP.<br>3. Submit standard operating procedures (SOPs) associated with the QAPPs. SOPs will be referenced during the QAPP review; however, SOPs will not be reviewed or approved.<br>4. If no monitoring is planned, respond to this commitment by stating, "No air toxics monitoring will be performed."<br>Electronic copies may be submitted to R4airqa@epa.govand hard copies to: EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, GA 30605, Attn: Quality Assurance Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf. | 180 days prior to expiration of QAPPs | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-25 | If applicable, encourage laboratories conducting analyses for air toxics to participate in any available national or regional inter-laboratory proficiency testing programs and audits and make identified modifications to enhance data quality. | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-26 | If applicable, enter quality assured and associated QA/QC data into the AQS database system no later than 180 days from the end of the quarter for all ambient air toxics monitoring data collected. | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-27 | As part of the QA competency demonstration submittal (Reporting Requirement 20-14) that your agency submits to EPA with its annual grant application package, provide a listing of all QA documents (QMPs, QAPPs, and SOPs) for the air toxics pollutants network maintained by your agency, and the date that each document was most recently revised and approved (EPA approval only required for QMPs and QAPPs). | | | | Sandra Veazey<br>850-717-9042<br>Sandra.Veazey@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | AM | DARM | IAQ-28 | Assume delegation and implementation of all promulgated CAA Section 111, 112, and 129 rules and standards (NESHAP and NSPS) within 9 to 12 months of EPA's promulgation, as appropriate, if a rulemaking is required to task delegation via the Agency's CAA Title V approval process. Notify Region 4 by submitting rule adoption documentation within 60 days of adoption. Notwithstanding the above, FDEP may decline delegation of one or more of the area source MACT regulations. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-29 | Work towards establishing the programmatic expertise to address the risk-based components of CAA Sections 111, 112, and 129, by pursuing risk training when appropriate. | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-30 | Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and provide copies of approvals to the Region upon issuance (see 40 CFR Part 63.91(g)(1)(ii)). | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | B&D | DARM | IAQ-31 | Prepare and submit CAA Sections 111(d) and 129 State Plans and letters of certification in accordance with regulatory timeframes. In addition, collect and transmit data reflecting the status of Sections 111(d) and 129 plans annually, consistent with 40 CFR 60.25(e) and (f). | | | | Hastings Read<br>850-717-9017<br>Hastings.Read@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| | | | | **GOAL 3: GREATER CERTAINTY, COMPLIANCE, AND EFFECTIVENESS** | | | | | | |
| | | | | **Objective 3.1: Compliance with the Law** | | | | | | |
| CAA | P&C | DARM | | ***Asbestos - Some P&C's were either deleted or moved to Appendix C*** | | | | | | |
| CAA | P&C | DARM | M&E-1 | Ensure enforcement and compliance monitoring is consistent with the Compliance Monitoring Strategy Policy revised and reissued on July 14, 2014 and the Timely and Appropriate Enforcement Response to High Priority Violations Policy revised and reissued on August 25, 2014. Ensure complete accurate and timely data support of the Integrated Compliance Information System (ICIS-Air). | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | M&E-2 | Resolve violations of any rule for which EPA has delegated authority to the state or local agency. At EPA's request, the state or local program may also choose to resolve violations of those federal rules that they have not adopted. Federally Reportable Violations should be reported to ICIS-Air in accordance with the Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources revised and reissued on September 23, 2014. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | M&E-3 | Respond to complaints regarding NESHAP asbestos demolition/renovation projects. Florida's contractor certification program is administered by the Florida Department of Business and Professional Regulation. EPA will notify FDEP of any asbestos complaints referred to EPA. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | M&E-4 | As necessary, FDEP will observe asbestos work practices in progress to assess compliance with the asbestos NESHAP requirements. FDEP will maintain capable staff who have the equipment and proper training for entering the containment areas if necessary. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | M&E-5 | Report the following asbestos NESHAP activities at least forty-five (45) days after each fiscal six-month period 1) number of notifications received; 2) number of inspections; 3) non-notifier activity if applicable; 4) number of non-penalty enforcement actions; 5) number of enforcement actions with an assessed penalty; and 6) total penalty assessment. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | M&E-6 | Maintain a State/Local health and safety plan for asbestos demolition/renovation inspectors. Plan to include medical monitoring, protective equipment, and training as minimum requirements. Alternatively, implement EPA's "Health and Safety Guidelines for EPA Asbestos Inspectors," dated March 1991. These documents will be reviewed by EPA during state program visits. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | M&E-7 | Recommend (where appropriate) cases and provide support to the EPA Criminal Enforcement Program. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| | | | | ***Emission Inventories - P&C's were either deleted or moved to Appendix C*** | | | | | | |
| | | | | ***Air Planning - Some P&C's were either deleted or moved to Appendix C*** | | | | | | |
| | | | CCI-1 | Review the National Air Toxic Assessment (NATA) results during the year the EPA Office of Air Quality Planning and Standards (OAQPS) requests it and make revisions to your agency's inventory. Support the Emission Inventory System (EIS) in reporting the National Emissions Inventory (NEI) for hazardous air pollutants. The EPA requests that state, local, and tribal air agencies submit emissions information updates for major point sources to EIS database annually or as requested by OAQPS. Information on the EIS Gateway can be found at: https://www.epa.gov/air-emissions-inventories. The state and local NEI/NATA contact in the Air Data and Analysis Section should be notified via e-mail when the 2019 submittal is made to the EIS. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| | | | CCI-2 | Develop and submit to EPA, emissions inventory information for all applicable point sources, criteria air pollutants (CAP) and time frames consistent with the Air Emissions Reporting Requirements (AERR) Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The CAPs point source emissions inventories should be submitted to EPA Headquarters through the Emissions Inventory System (EIS) Gateway no later than January 15, 2020. Early submittals are recommended. Information on the EIS Gateway can be found at: https://www.epa.gov/air-emissions-inventories. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2019 submittal is made to the EIS. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| | | | CCI-3 | Submit a draft Performance Partnership Agreement for FDEP's regulatory programs. | | | | John Dawson<br>850-717-9085<br>John.Dawson@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov" | |
| CAA | B&D | DARM | CCI-4 | Participate with EPA in an end of year evaluation of performance to be completed by March 1st. This evaluation will be based on an annual summary report submitted by the agency by December 31, and on progress reports received throughout the year. In accordance with 40 CFR 35.115 and the EPA Policy on Managing Unliquidated Obligations and Ensuring Progress under EPA Assistance Agreements, the joint evaluation process will include:<br>A. discussions of accomplishments as measured against work plan commitments;<br>B. discussions of the cumulative effectiveness of the work performed under all work plan components;<br>C. discussions of existing and potential problem areas;<br>D. suggestions for improvement, including, where feasible, schedules for making improvements; and<br>E. discussions of how effectively grant funds were managed and utilized, taking into account any accumulation of unliquidated obligations. | March 1, 2021 | | | John Dawson<br>850-717-9085<br>John.Dawson@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |
| CAA | P&C | DARM | CCI-5 | Agency's expectations of EPA (Optional)<br>1) EPA will provide sufficient technical support in order for FDEP to meet those commitments requiring electronic transfer of information.<br>2) EPA will notify FDEP Tallahassee of issues within Florida that come to EPA's attention.<br>3) EPA will allow flexibility regarding the objectives and commitments above, so that Florida may effectively direct its resources based on its specific and changing needs. | | | | Syed Arif<br>850-717-9039 Syed.Arif@FloridaDEP.gov | Angela Isom<br>404-562-9092<br>Isom.Angela@epa.gov | |

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| Grant | Program | Division | FFY 2020 Task No. | DEP 2020 PPA Priorities & Commitments List | Schedule/ Due Date | Florida DEP August 2019 Proposed Changes | EPA Comment | DEP Contact | EPA Contact | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | | | | |
| | | | | **Objective 1.3: Revitalize Land and Prevent Contamination** | | | | | | |
| | | | | ***~~RCRA Authorization - Some P&C's were either deleted or moved to Appendix C~~*** | | | ~~This was not found in Appendix C~~ | | | |
| | | | | ***RCRA Training and Meetings - Some P&C's were either deleted or moved to Appendix C*** | | | | | | |
| | | | | ***Permit Renewals - Some P&C's were either deleted or moved to Appendix C*** | | | | | | |
| RCRA | HazWst | DWM | p.8 Permitting | Implement an effective permitting program for all facilities, emphasizing: permit renewal obligations, emergency permits, and EPA identification number notifications/registrations. | | | | Michell Smith,<br>850-245-8721,<br>Michell.M.Smith@dep.state.fl.us | Carlos Merizalde (404) 562-8606<br>Merizalde.Carlos@epa.gov | |
| | | | | ***Corrective Action: Environmental Indicators*** | | | | | | |
| RCRA | HazWst | DWM | p.8 Permitting | Institutional controls will be implemented, inspected and updated as needed. Institutional controls will also be entered into RCRAInfo as they are approved. | | | | Michell Smith,<br>850-245-8721,<br>Michell.M.Smith@dep.state.fl.us | Brian Bastek, RCRA Corrective Action Florida<br>(404) 562-8511<br>Bastek.Brian@epa.gov | |
| RCRA | HazWst | DWM | p.12 Corr Act | Focus on meeting the goals of the GPRA, focusing on the 2020 Baseline Environmental Indicators. | See RCRA Permitting Tables in Work Plan Appendix | | | Michell Smith,<br>850-245-8721,<br>Michell.M.Smith@dep.state.fl.us | Brian Bastek, RCRA Corrective Action Florida<br>(404) 562-8511<br>Bastek.Brian@epa.gov | |
| RCRA | HazWst | DWM | p.12 Corr Act | By 2019 control all identified unacceptable human exposures from site contamination to at or below health-based levels for current land and/or groundwater use conditions at 94% of 2020 Corrective Action Baseline (i.e., CA725). 2. By 2019 control the migration of contaminated groundwater through engineered remedies or natural processes at 88% of 2020 Corrective Action Baseline (i.e., CA750). 3. By 2019 complete construction of remedies at 69% of 2020 Corrective Action Baseline (i.e., CA550). 4. By 2019 attain corrective action performance standards at 32% of 2020 Corrective Action Baseline (i.e., CA900/999). | See RCRA Permitting Tables in Work Plan Appendix | | | Michell Smith,<br>850-245-8721,<br>Michell.M.Smith@dep.state.fl.us | Brian Bastek, RCRA Corrective Action Florida<br>(404) 562-8511<br>Bastek.Brian@epa.gov | |
| RCRA | HazWst | DWM | p.13 Corr Act | Develop and implement state remediation orders for facilities where corrective action is required. | As required | | | Michell Smith,<br>850-245-8721,<br>Michell.M.Smith@dep.state.fl.us | Brian Bastek, RCRA Corrective Action Florida<br>(404) 562-8511<br>Bastek.Brian@epa.gov | |
| RCRA | HazWst | DWM | p.13 Corr Act | Use grant funds for a contract with the University of Florida to serve as an outsource partner to fill the Department's absence of in house expertise on human health or ecological risk assessment. | Ongoing | | | Michell Smith,<br>850-245-8721,<br>Michell.M.Smith@dep.state.fl.us | Robert Reimer<br>(404) 562-8484<br>Reimer.Robert@epa.gov | |
| RCRA | HazWst | DWM | | FDEP and EPA to collaborate on resolving the status of facility permit information in RCRAInfo. | Ongoing | | | Michell Smith,<br>850-245-8721,<br>Michell.M.Smith@dep.state.fl.us | Robert Reimer<br>(404)-562-8484<br>Reimer.Robert@epa.gov | |
| | | | | **GOAL 3: GREATER CERTAINTY, COMPLIANCE, AND EFFECTIVENESS** | | | | | | |
| | | | | **Objective 3.1: Compliance with the Law** | | | | | | |
| | | | | ***RCRA Coordination*** | | | | | | |
| RCRA | HazWst | DWM | p.3 Dev&Adm | The Department will continue to provide information in response to EPA requests and will work with EPA to gather and analyze data for the biennial reports. | Ongoing | | | Kim Walker (850) 245-8934<br>kim.walker@dep.state.fl.us | Robert Reimer<br>(404) 562-8484<br>Reimer.Robert@epa.gov | |
| RCRA | HazWst | DWM | p.3 Dev&Adm | During Legislative Session, information and updates on bills which may affect the Department's hazardous waste program will be provided to EPA. | As needed | | | Kim Walker (850) 245-8934<br>kim.walker@dep.state.fl.us | Robert Reimer<br>(404) 562-8484<br>Reimer.Robert@epa.gov | |
| | | | | ***RCRA - Compliance & Enforcement*** | | | | | | |
| RCRA | HazWst | DWM | p.2 General Strategy | Expand the variety of compliance assistance tools available to Florida small businesses (i.e.VSQG and SQGs) to familiarize them with the RCRA regulations and improve their compliance. Inspect all environmentally significant facilities, annually or biennially, based on facility status. FDEP will continue to operate its enforcement program in accordance with EPA's 2015 Compliance Monitoring Strategy (CMS) for RCRA Subtitle C Program, National Program Manager's Guidance (NPMG), 2003 Hazardous Waste Enforcement Response Policy (ERP), June 2003 RCRA Civil Penalty Policy, and Supplemental Environmental Project Policy to complete and track appropriate case development and data management activities. Address significant non- compliers (SNCs) with timely and appropriate enforcement response in accordance with the ERP and the most recent MOA. Continue targeted inspection efforts to visit previously uninspected generators. | Ongoing | | | Glen Perrigan<br>850-245-8749<br>glen.perrigan@dep.state.fl.us | Parvez Mallick<br>(404) 562-8610<br>Mallick.Parvez@epa.gov | |
| RCRA | HazWst | DWM | p.1 Program Goal p.5 Enf&Comp p.6 Enf&Comp | Inspect generators, transporters, and TSD facilities to monitor their compliance with the applicable regulations, permit compliance schedules, and permit conditions. Direct compliance-monitoring activities and compliance assistance toward those handlers presenting the greatest degree of environmental risk to groundwater and drinking water. FFY2020 inspection targets will be based on the commitment level (percentages) provided in Appendix D: Work Plan Compliance LOS, and the corresponding facility/inspection commitments will be generated and provided to EPA based on the inventory of facilities at the beginning of FFY2020 (as of November 1, 2019). Minimimum annual inspections commitments as established in the Level of Service. In addition, FDEP will include the following in selecting which facilities to be inspected in FFY2020:<br>- Never inspected regulated generators;<br>- Conduct complaint investigations as necessary to ensure compliance with RCRA;<br>- Facilities that certified closure and are subject to post-closure ground water monitoring. | Inspection Level of Service in Appendix C | | | Glen Perrigan<br>850-245-8749<br>glen.perrigan@dep.state.fl.us | Parvez Mallick<br>(404) 562-8610<br>Mallick.Parvez@epa.gov | |
| | | | | ***Waste Application Enhancements (State Priorities)*** | | | | | | |

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| Grant | Program | Division | FFY 2020 Task No. | DEP 2020 PPA Priorities & Commitments List | TO ADD<br>Basis for Commitment | Schedule/ Due Date | Florida DEP August 2019 Proposed Changes | EPA Comment | DEP Contact | EPA Contact | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | | | | | |
| | | | | **Objective 1.2: Provide for Clean and Safe Water** | | | | | | | |
| | | | | ***Source and Drinking Water - Some P&C's were deleted or moved to Appendix C*** | | | | | | | |
| PWSS | DrinkingWtr | DWRM | P-1 | Revise current primacy programs to adopt new Federal Drinking Water regulations to implement the Safe Drinking Water Act and the amendments of 1996. Compliance with Primary Drinking Water Regulations Implementation (EPA State Program Manager to ensure that the State is on track with any tasks or actions the State will be using to ensure compliance with the Primary Drinking Water Regulations.) Commitments: Revise and/or adopt regulations in accordance with the SDWA. Submit a primacy application for EPA review and approval. The DEP districts and DOH delegated offices are responsible for conducting Sanitary Surveys and do so every three years for CWSs and NTNCs, and every five years for TNCs. Sanitary Surveys are supplemented with follow-up inspections and complaint investigations as necessary, and annual inspections as resources allow. Oversight is provided at DEP headquarters.State Approved Rules:<br>*CCR; *APA; *Arsenic;<br>*FBRR<br>*New PWS Definition<br>*Operator Cert./ERG<br>*Radionuclide<br>*LCMR<br>*IESWTR<br>*Stage 1 DBPR<br>*LT1 IESWTR<br>*LCR STR<br>*Ground Water Rule<br>*Long Term 2 IESWTR<br>*Stage 2 DBPR<br>State Interim Primacy, Under EPA Review:<br>*rTCR<br>*PN | 40 CFR 141<br>40 CFR 142<br>EPA Strategic<br>Plan References:<br>1.2, SP-1 and<br>SP-2 | Within two years of the Federal Rule adoption date or an extension request of two additional years. | | Recommend replacing language: (EPA State Program Manager to ensure that the State is on track with the compliance and implementation of these requirements) with the following instead: Ensure ongoing compliance with Primary Drinking Water Regulations by implementing State-Approved Rules for which State has received final primacy. Recommendation to move the following language to P3: "The DEP districts and DOH delegated offices are responsible for conducting Sanitary Surveys and do so every three years for CWSs and NTNCs, and every five years for TNCs. Sanitary Surveys are supplemented with follow-up inspections and complaint investigations as necessary, and annual inspections as resources allow. Oversight is provided at DEP headquarters." | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-3 | Maintain a systematic sanitary survey program and follow up on any discrepancies discovered during sanitary surveys as required by regulation. Conduct sanitary surveys based on the cycle for water system size, source water, and type. State provides through SDWIS the completed sanitary surveys for the current year from which EPA can obtain a complete listing. | Regional Priority<br>141.21(d), 142.16(b)(3) and<br>142.16(o)<br>EPA Strategic Plan References:<br>1.2 | Annually – September 30 | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-6 | Maintain a water system design and construction plan and specification review program. State can verify to EPA through state regulations/laws on-line. State responsible for ensuring compliance. | 142.10(b)(5)<br>EPA Strategic Plan References:<br>1.2, SP-1 and SP-2 | Annually on 9/30 | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-7 | Ensure newly permitted public water systems have design/construction capable of compliance with SDWA regulations. State responsible for ensuring compliance. | Program Priorities Guidance<br>EPA Strategic Plan References:<br>1.2, SP-1 and SP-2 | Annually on 9/30 | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-9 | Ensure analytical methods are being applied to demonstrate compliance with the regulations. State responsible for ensuring compliance. | 141 Subpart C<br>EPA Strategic Plan References:<br>1.2, SP-1 and SP-2 | Annually on 9/30 | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-13 | Establish and follow quality assurance procedures to ensure that data entered into SDWIS/FED is of the highest reliability and maximum value to the public. Work with regional staff on trouble shooting errors. | EPA Strategic Plan References:<br>1.2, SP-1 and SP-2 | Ongoing | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-14 | Participate in Program Reviews, attend the two State Directors' Meetings, the Data Managers' Users Conference, AWOP quarterly meetings and comprehensive performance evaluations as needed, "new initiative training" such as SDWIS, ERPs, and new rule training, and the ASDWA annual meeting. Attend meetings and training to remain current with PWSS program requirements as appropriate, consistent with DEP's mission and priorities. Attend meetings and training to remain current with PWSS program requirements. DEP staff will participate in training and travel opportunities as funds and travel restrictions allow. | EPA Strategic Plan References:<br>1.2, SP-1 and SP-2 | Ongoing | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-15 | Develop and implement a Capacity Development strategy to assist public water systems in acquiring and maintaining technical, managerial, and financial capacity. Annual Report to EPA. Provide updates and reports to Drinking Water Section Capacity Development Coordinator and cc State Program Manager. | §1420 (c)<br>EPA Strategic Plan References:<br>1.2, SP-1 and SP-2 | 90 days after end of reporting period:<br>December 31 | | Recommend: next Triennial Capacity Development Report will be submitted by 9/30/20 | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-17 | Operator Certification Program: Perform Internal and External Program Reviews. | F.R. Vol. 64, Number 24<br>EPA Strategic Plan Reference: 1.2 | Internal Review (every 3 years) due 5/1/2020 -<br>External Review (every 5 years) due 5/1/2022 | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | P-19 | The State commits to accept for use only data that is generated in accordance with applicable methods and procedures presented or cited in 40 CFR Part 141, 40 CFR Part 142, 40 CFR Part 143, state PWSS Program primacy applications approved by EPA, and the EPA-approved Quality Management Plan. Commitments: Annual State QA data certification letter to accompany PWSS program grant application. State to provide to EPA Drinking Water Grants Coordinator an Annual Data Quality Certification Letter. | EPA Order 5360.1 A1<br>40 CFR §31.45<br>No measure associated with this activity | Annually on 10/1 | | Submit QA Annual Certification for the PWSS program, prior to award | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | | NEW TASK: Assist EPA with ensuring that CWSs serving >3300 people certify completion of a water system risk assessment and emergency response plan in accordance with applicable deadlines established under Section 2013 of AWIA. | SDWA §1433, AWIA Section 2013 requirement that all CWSs complete a water system risk assessment between March 2020 to June 2021, depending on system size | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| | | | | ***DWP - Whole Effluent Toxicity - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***NPDES CAFO - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***DWP - Publicly Owned Treatment Works - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | **GOAL 3: GREATER CERTAINTY, COMPLIANCE, AND EFFECTIVENESS** | | | | | | | |
| | | | | **Objective 3.1: Compliance with the Law** | | | | | | | |
| | | | | ***PWSS - Compliance & Enforcement - Some P&C's were either deleted or moved to Appendix C*** | | | | | | | |
| PWSS | DrinkingWtr | DWRM | E-2 | Provide appropriate and required information when referring enforcement cases to EPA to include:<br>• Public Water System Name and Identification Number<br>• Public Water System Owner/Operator Name<br>• Ownership Information – The State will submit available evidence/documentation on ownership and whether ownership has ever been contested or even raised as an issue at the State level.<br>• Public Water System Current Address<br>• Public Water System Telephone Number<br>• Public Water System Population and Type of System<br>• Number of Service Connections<br>• Actual Count<br>• Factoring Method<br>• Evidence of Violations – At the time of referral, the State shall submit to EPA the entire file (or a copy of that file) that is pertinent to the case. EPA will work with the State to achieve the most efficient method for securing a copy of the file. Before and enforcement action is issued, EPA needs to ensure that there is evidence in the Region 4 office to support every violation listed – either hard copy evidence or a tabular summary from the State of its violation information.<br>• Copies of all State enforcement actions<br>• Date Case Referred by State Drinking Water Program (complete package with letter of referral by the State)<br>• Date of most recent Sanitary Survey (please provide a copy to EPA) | SDWA 1414(b)(2)<br>EPA Strategic Plan Reference:<br>3.1; SDWA 02 | As needed | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov | |
| PWSS | DrinkingWtr | DWRM | E-3 | Address with a formal enforcement action or return to compliance the number of priority systems equal to the number of PWS's that have a score of 11 or higher on the July 2017 ETT report (for FY18), July 2018 report (for FY19), and July 2019 report (for FY20). Note: All data pertaining to compliance status (i.e. formal enforcement activity or Return to Compliance) must be uploaded to SDWIS-Fed in time to show in the October 2018 ETT list (for FY18), October 2019 ETT List (for FY19), or October 2020 ETT list (for FY20) in order to be counted towards this commitment. (For most states this would be the August 15 upload unless a state is doing uploads more frequently than quarterly). | National Priority ACS Commitment<br>EPA Strategic Plan Reference:<br>3.1; SDWA 02 | Within two quarters for those systems being identified as priorities | | For clarity, it may be helpful to remove the dates of ETT reports that pertain to previous-year's PWSS PPA Workplans | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov | |
| PWSS | DrinkingWtr | DWRM | E-4 | Take immediate action to address 100% of health-based and major monitoring/reporting violations for acute contaminants for PWSs with an ETT score of ≥ 11. | National Priority<br>Regional Priority<br>EPA Strategic Plan Reference:<br>3.1; SDWA 02 | Within two quarters for those systems being identified as priorities | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov | |
| PWSS | DrinkingWtr | DWRM | E-5 | Address PWSs with an ETT score of < 11 on an ongoing/rolling basis. | National Priority<br>Regional Priority<br>EPA Strategic Plan Reference:<br>3.1; SDWA 02 | As appropriate | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov | |
| PWSS | DrinkingWtr | DWRM | E-6 | The State will escalate its response to violations in accordance with its enforcement management system to ensure return to compliance. | National Priority<br>Regional Priority<br>EPA Strategic Plan Reference:<br>3.1; SDWA 02 | As appropriate | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Amanda Driskell<br>404-562-9735<br>Driskell.Amanda@epa.gov | |
| | | | | ***PWSS Application Enhancements (State Priorities)*** | | | | | | | |
| PWSS | DrinkingWtr | DWRM | | Implement enhancements and infrastructure upgrades to the existing PWS application to enable Florida's inspectors to record and document findings while in the field and conducting inspections.<br><br>Phase 1, Web Form Upgrades: Update the field inspection application infrastructure to replace the existing system's web forms with a modernized web interface that is consistent with the look and functionality of other programmatic applications being used by the Department's inspection staff. | State Priority | 30-Jun | | | Dan P. Willis<br>850-245-8344<br>Dan.P.Willis@dep.state.fl.us | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | | Implement enhancements and infrastructure upgrades to the existing PWS application to enable Florida's inspectors to record and document findings while in the field and conducting inspections.<br><br>Phase 2, Disconnected process enhancement: Enhance the field inspection application system by replacing the existing system's functions for capturing and later uploading inspection information, when the field device in not able to receive a cellular connection, with one that is portable and independent of the field devices' operating system platform. | State Priority | 30-Jun | | | Dan P. Willis<br>850-245-8344<br>Dan.P.Willis@dep.state.fl.us | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | | Implement enhancements and infrastructure upgrades to the existing PWS database application to allow for electronic reporting of analytical sampling data from certified laboratories to the state in accordance with DEP's paperless initiative. This project will also maintain data integrity and increase efficiency in reporting. | State Priority | *In-process* | | | Dan P. Willis<br>850-245-8344<br>Dan.P.Willis@dep.state.fl.us | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | | Implement enhancements and infrastructure upgrades to the existing PWS database application to allow for electronic application for Water main extension permits to the state within the Enterprise Self Service Authorization system in accordance with DEP's paperless initiative. This project will also maintain data integrity and increase efficiency and speed of the application process. | State Priority | *In-process* | | | Dan P. Willis<br>850-245-8344<br>Dan.P.Willis@dep.state.fl.us | Allison Humphris<br>404-562-9305<br>Humphris.allison@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 3 | Protect ground water and source water areas by reducing the occurrence of ground water pollution. | NPG<br>Measure<br>SDWSP4a and<br>SDWSP4b | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 4 | Develop and implement ground water quality standards/ risk based rules. | NPG<br>Measure<br>SDW-SP4a and SDW-4b | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 5 | Consider development and implementation of a plan to characterize the states ground water resources. | Program priority | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 6 | Consider designing and implementing a State ground water monitoring program. | Program priority | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 9 | States are encouraged to participate in the Source Water Collaborative.<br>http://www.sourcewatercollaborative.org/ | NPG | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 10 | States should consider placing a high priority on (a) waterbodies where state or local source water assessments have identified highly threatening sources of contamination that are subject to CWA and (b) the development and implementation of TMDLs to address impairments of the public water supply use. In particular, States should consider the relationship between point source dischargers and drinking water intakes in setting permit requirements and inspection and enforcement priorities. | NPG | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 12 | Education and Outreach: DEP ground water staff will continue to maintain program web pages. The web pages provide information on the wellhead protection and source water assessment and protection programs, ground water standards, and ground water assessments for individual basins in Florida. | State Program priority | On-going | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 13 | Provide cross–program/cross agency coordination. | State Program priority | on-going | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 13 | Cross–program/cross agency coordination (continued):<br>• The Source and Drinking Water Program will hold Water Well Contractor Work Group meetings with representatives from the water management districts, FDOH, the Florida Ground Water Association and private water well contractors. Water well permitting, construction requirements, contractor licensing, rules and other related issues were discussed at these meetings as appropriate, consistent with DEP's mission and priorities. Grant funds support travel and one environmental specialist position to perform technical review and data management. FDEP staff will continue to participate in training and travel opportunities as funds and travel restrictions allow. Continue to implement the FLUWID. The objective of the program is to assign a unique alphanumeric code to water wells using a FLUWID tag affixed to a well head to facilitate well identification and interagency exchange of water well data. Grant funds support the purchase of FLUWID tags.<br>• The Ground Water Regulatory Section will continue to maintain the Water Well Contractor Violation clearinghouse. The clearinghouse is used by the FDEP and the water management districts to track water well contractors, license numbers, violations of the water well construction rules, disciplinary action, and fines. The clearinghouse also tracks non-licensed water well construction activities, violation and fines. The clearinghouse is updated weekly. The Source and Drinking Water Program will continue to oversee and maintain the contract for the Water Well Contractor Continuing Education Program.<br>Output: (a) Report activities (other than source water/wellhead protection) that involve and promote coordination/collaboration with other programs and agencies.<br>Outcome: (b) Protection of ground water and public health. | State & EPA program priority | | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 14 | Data management/ GIS: FDEP will continue to maintain data on ambient ground water and springs water quality data that represents FDEP-collected data. Periodic downloads of ground water and spring data from the 5 water management districts and the USGS will also be obtained and used for assessment purposes. FDEP will continue GIS-based SWAPP assessments. SWAPP results and data are maintained in an Oracle database that is used to provide data for the SWAPP website. | State program priority | on-going | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 15 | Environmental Justice: All environmental regulations under development in Florida are discussed during public workshops to engage local citizens into the public policy forum. | State & EPA program priority | on-going | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| PWSS | DrinkingWtr | DWRM | 18 | The State shall commit to fund travel for appropriate staff to attend Regional/National meetings (e.g., State Water Directors meeting) that focus on ground water and source water protection issues as appropriate, consistent with DEP's mission and priorities. Meetings lead to increased knowledge concerning the protection of ground water and source water, including other States' activities. | Requested by State | On going | | | Jamie Shakar 850-245-8626<br>jamie.shakar@dep.state.fl.us ~~Joni Synatschk 850-245-8599~~<br>~~Joni.Synatschk@dep.state.fl.us~~ | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |

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| Grant | Program | Division | FFY 2020 Task No. | DEP 2020 PPA Priorities & Commitments List | TO ADD<br>Basis for Commitment | Schedule/ Due Date | Florida DEP August 2019<br>Proposed Changes | EPA Comments | DEP Contact | EPA Contact | 2020 Mid-Year report<br>"Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | | | | | |
| | | | | **Objective 1.2: Provide for Clean and Safe Water** | | | | | | | |
| | | | | ***Underground Injection Control - Some P&C's were deleted or moved to Appendix C*** | | | | | | | |
| UIC | APP | DWRM | Admin-1 | Administration - The State commits to fund travel for appropriate staff to attend Regional/National meetings and training (e.g., State/EPA UIC meeting, and training courses) that focus on underground injection as appropriate, consistent with DEP's mission and priorities. | Requested by State | On going | | | ~~Joni Synatschk 850-245-8596~~<br>~~Joni.Synatschk@floridadep.gov~~<br>Cindy Fischler 850-245-8658<br>Cindy.Fischler@floridadep.gov | Jason Meadows,<br>404-562-9399,<br>Meadows.jasonb@epa.gov | |
| UIC | APP | DWRM | Permit-1 | Permits - The State will review hazardous determination for all non-municipal Class I facilities during permit modifications or renewals. | EPA Region 4 Requirement | On going | | | ~~Joni Synatschk 850-245-8596~~<br>~~Joni.Synatschk@floridadep.gov~~<br>Cindy Fischler 850-245-8658<br>Cindy.Fischler@floridadep.gov | Jason Meadows,<br>404-562-9399,<br>Meadows.jasonb@epa.gov | |
| UIC | APP | DWRM | Enfrc-1 | Enforcement Actions - The State will seek penalties for violations in a manner which deters violations. | EPA Region 4 Requirement | On going | | | ~~Joni Synatschk 850-245-8596~~<br>~~Joni.Synatschk@floridadep.gov~~<br>Cindy Fischler 850-245-8658<br>Cindy.Fischler@floridadep.gov | Jason Meadows,<br>404-562-9399,<br>Meadows.jasonb@epa.gov | |
| UIC | APP | DWRM | PI, T, TA-1 | Public Information, Training and Technical Assistance - The State will conduct outreach programs to inform the public of all types of UIC wells and regulations. (Does not include permitting and enforcement/compliance activities). | EPA Region 4 Requirement | On going | | | ~~Joni Synatschk 850-245-8596~~<br>~~Joni.Synatschk@floridadep.gov~~<br>Cindy Fischler 850-245-8658<br>Cindy.Fischler@floridadep.gov | Jason Meadows,<br>404-562-9399,<br>Meadows.jasonb@epa.gov | |

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| Grant | Program | Division | FFY 2020 Task No. | DEP 2020 PPA Priorities & Commitments List | TO ADD<br>Basis for Commitment | Schedule/ Due Date | Florida DEP August 2019<br>Proposed Changes | EPA Comment | DEP Contact | EPA Contact | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | | | | | |
| | | | | **Objective 1.2 – Provide for Clean and Safe Water** | | | | | | | |
| | | | | ***DWP - Whole Effluent Toxicity - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***NPDES CAFO - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***DWP - Publicly Owned Treatment Works - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| 106 | Enforcement | DWRM | 9.d | SIUs Discharging to Unapproved POTWs<br>If SIUs are actively discharging, or pursuing discharge, to POTWs without active approved programs, then the State Industrial Pretreatment Program shall perform the oversight activities required by 40 CFR 403.10(f)(2)(i) until the NPDES permit(s) for such POTWs reflect active approved programs. | 40 C.F.R. § 403 | | | | Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov | Alenda Johnson<br>404-562-9761<br>Johnson.Alenda@epa.gov | |
| 106 | Enforcement | DWRM | 9.f | Compliance/Enforcement Actions<br>Copies of inspection/audit reports or enforcement actions issued by the state or local Industrial Pretreatment Program will be provided to the EPA PTC upon request. | 40 C.F.R. § 403 | Upon request | | | Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov | Alenda Johnson<br>404-562-9761<br>Johnson.Alenda@epa.gov | |
| | | | | ***NPDES Stormwater - Some P&C's were deleted or moved to Appendix C*** | | | | | | | |
| 106 | Enforcement | DWRM | 1 | For the following categories of NPDES permits, the State agrees to provide permit issuance and expiration dates. For any permits that have or will be expiring, the State agrees to indicate the anticipated dates by which such permits will be noticed as draft for public review/comment and issued as final:<br>(a) MS4s for phase I municipalities<br>(b) MS4s for phase II municipalities (general and/or individual permits)<br>(c) construction general permits | EPA 2013 Strategic Plan References: WQ 12a,<br>WQ-13(a,c) | On-going | | | Borja Crane-Amores<br>850-245-7520<br>Borja.CraneAmores@floridadep.gov | Mike Mitchell<br>404-562-9303<br>Mitchell.Michael@epa.gov | |
| 106 | Enforcement | DWRM | 2 | For each of the following permit types that has been expired for more than one year as of October 1st, the State agrees to issue the final permit and provide mid and end of year reports that describe the steps/measures that the State is taking to reissue the permit, along with the status of the draft permit and proposed issuance date:<br>(a) MS4s for phase I municipalities;<br>(b) MS4s for phase II municipalities (general and/or individual permits); and<br>(c) construction general permits. | EPA 2013 Strategic Plan References: WQ 12a,<br>WQ-13(a,c) | On-going | | | Borja Crane-Amores<br>850-245-7520<br>Borja.CraneAmores@floridadep.gov | Mike Mitchell<br>404-562-9303<br>Mitchell.Michael@epa.gov | |
| | | | | ***Monitoring Program - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***NPDES Permitting - Some P&C's were either deleted or moved to Appendix C*** | | | | | | | |
| 106 | NPDES Permitting | DWRM | 3 | ~~The State agrees to implement the permit related requirements of the NPDES Memorandum of Agreement (MOA) between the State and EPA Region 4 as detailed in Section II, III and IV and IX. In particular, all draft permit packages submitted to EPA for review shall contain the information specified in Section IV.B.2. of the MOA. For a current copy of the MOA, see: http://www.epa.gov/compliance/resources/policies/state/moa/~~<br><br>~~Complete permit review packages.~~<br><br>Recommendation change: The State agrees to implement the permit related requirements of the NPDES Memorandum of Agreement (MOA) between the State and EPA Region 4. For a copy of current MOA, see:<br>http://www.epa.gov/compliance/memorandum-agreements-between-epa-and-states-authorized-implement-national-pollutant<br>Basis for Task: Program requirement (40 CFR Section 123.24)<br><br>Output: Complete permit review packages | Program requirement | On-going | | Recommendation change: The State agrees to implement the permit related requirements of the NPDES Memorandum of Agreement (MOA) between the State and EPA Region 4. For a copy of current MOA, see:<br>http://www.epa.gov/compliance/memorandum-agreements-between-epa-and-states-authorized-implement-national-pollutant<br>Basis for Task: Program requirement (40 CFR Section 123.24)<br>Output: Complete permit review packages | Marc Harris<br>850-245-8590<br>Marc.Harris@floridadep.gov;<br>Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov | Bridget Staples<br>404-562-9783<br>staples.bridget@epa.gov;<br>Jennifer Shadle<br>404-562-9436<br>shadle.jennifer@epa.gov | |
| ~~106~~ | ~~NPDES Permitting~~ | ~~DWRM~~ | ~~4~~ | ~~As per Section IV.C.1.j. of the State/EPA MOA, the State agrees to send selected NPDES draft permits for EPA's review in consideration of identified regional and/or national priorities or initiatives. Just as for the required permit categories, the State agrees to send the same information required under the MOA, including submission of a copy of the final permit after issuance.~~<br><br>~~EPA will track draft permits received.~~ | ~~Program Priority<br>WQ-19a~~ | ~~On-going~~ | | Recommendation: delete due to National Water Program Guidance | ~~Marc Harris<br>850-245-8590<br>Marc.Harris@floridadep.gov;<br>Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov<br>Borja Crane-Amores<br>850-245-7520<br>Borja.CraneAmores@dep.state.fl.us~~ | ~~Bridget Staples<br>404-562-9783<br>staples.bridget@epa.gov;<br>Jennifer Shadle<br>404-562-9436<br>shadle.jennifer@epa.gov<br>Mike Mitchell<br>404-562-9303<br>Mitchell.Michael@epa.gov~~ | |
| ~~106~~ | ~~NPDES Permitting~~ | ~~DWRM~~ | ~~6~~ | ~~The State should consider the relationship between point source dischargers and drinking water intakes in setting permit requirements, and provide update on any activities related to the task.~~ | ~~Program Priority<br>WQ-19a~~ | ~~Ongoing~~ | | Recommendation: delete due to National Water Program Guidance | ~~Marc Harris<br>850-245-8590<br>Marc.Harris@floridadep.gov;<br>Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov~~ | ~~Bridget Staples<br>404-562-9783<br>staples.bridget@epa.gov;<br>Jennifer Shadle<br>404-562-9436<br>shadle.jennifer@epa.gov~~ | |
| 106 | NPDES Permitting | DWRM | 17 | ~~NEW TASK: To improve permit quality, the State agrees to implement essential action items identified in the Permit Quality Review (PQR) report and to evaluate recommended action items. Essential action items are those that address deficiencies or non-conformance with federal regulations. In the 2012-2017 PQR cycle, these items were classified as "Category 1". In addition, recommendations previously identified as either "Category 2" or "Category 3" have been consolidated into a single "recommended" category.~~<br><br>NEW TASK: To improve permit quality, the State agrees to implement essential action items identified in the draft 2018-2023 Permit Quality Review (PQR) report as they become finalized and to likewise evaluate recommended action items. Essential action items are those that address deficiencies or non-conformance with federal regulations. In the 2012-2017 PQR cycle, these items were classified as "Category 1" and EPA considers all 2012-2017 Category 1 action items to be resolved. In addition, 2012-2017 recommendations previously identified as either "Category 2" or "Category 3" have been consolidated into a single "recommended" category and EPA requests that the state agrees to continue to evaluate these recommended action items. | Basis for Task: Program requirement (to confirm compliance with<br>40 CFR Parts 122 - 133 and 400 – 699) | Output: Effective NPDES permits. Report annually by September 30th | | Per email dated 2/26 from Marc Harris the state and EPA agrees on the new language | Marc Harris<br>850-245-8590<br>Marc.Harris@floridadep.gov;<br>Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov | | |
| 106 | NPDES Permitting | DWRM | Task #??? | NEW TASK: By June 12, 2020, the State agrees to either update their NPDES permit application forms to incorporate changes to EPA's application regulations finalized on February 12, 2019 (84 FR 3324) or to transition to the new EPA forms effective June 12, 2019. To the extent the State has state-specific forms, these forms should also be reviewed to determine whether the instructions and formatting should be modified to increase the clarity of required information. | Program requirement (84 FR 3324) | **Output:** Effective NPDES permits | | FDEP 05/04/20 Comment - DEP's understanding is that the form review must be completed by June 2020. Beyond that, rulemaking for Chapters 62-600 and 62-620 of the Florida Administrative Code (F.A.C.) would need to be initiated to incorporate required form changes.<br><br>This was discussed during the EPA/FDEP call on 2/25/20 and was accepted, but this item is missing from the FDEP FY20 PPA Priorities Comment Compiled Summary and does not contain a Task #. | Marc Harris<br>850-245-8590<br>Marc.Harris@floridadep.gov;<br>Abel Agosto<br>850-245-8603<br>Abel.Agosto@floridadep.gov<br>Borja Crane-Amores<br>850-245-7520<br>Borja.CraneAmores@dep.state.fl.us | | |
| 106 | NPDES Permitting | DWRM | 19 | NEW TASK: The State agrees to update MS4 Phase II General Permits during the next permit cycle. Updates must have clear and enforceable permit requirements and ensure compliance with the Remand Rule (effective January 9, 2017). | Program requirement (81 FR 89320) | **Output:** Effective NPDES permits,, **Ongoing** | | New Task - EPA accepts FDEP's comments per call 2/25/20 | Borja Crane-Amores<br>850-245-7520<br>Borja.CraneAmores@dep.state.fl.us | | |
| 106 | NPDES Permitting | DWRM | 20 | NEW TASK: The State agrees to promote the use of green infrastructure and to consider incorporating green infrastructure requirements in stormwater permits. The State agrees to provide educational information to all permittees to encourage implementation of best management practices that include infiltration, evapotranspiration, harvesting and/or reusing storm water from new and redeveloped sites after construction is completed. | EPA's National Water Program Guidance Section 106 Supplemental Grant Guidance to States, Interstate Agencies, and Tribes for Fiscal Years 2020 and 2021; Water Infrastructure Improvement Act (01/2019), H.R.7279 (4-5), Section 5 | **Output:** Effective NPDES permits. **Ongoing** | | New Task - EPA accepts FDEP's comments per call 2/25/20 | Borja Crane-Amores<br>850-245-7520<br>Borja.CraneAmores@dep.state.fl.us | | |
| ~~106~~ | ~~NPDES Permitting~~ | ~~DWRM~~ | ~~21~~ | ~~New Task: The State agrees to enter accurate permitting and other data into PCS-ICIS or Permitting Management Oversight System (PMOS) in compliance with NPDES Electronic Reporting Rule. The State also agrees to enter and maintain minimum data elements as defined in Appendix A to 40 CFR Part 127.~~<br><br>~~The State will electronically transmit data to EPA within 40 days of when the State completes the activity or receives a report submitted by a regulated entity [40 CFR Part 127.23(c)(1)].~~ | ~~Program requirement (40 CFR Parts 9, 122, 123, 124, 127, 403, 501, and 503)~~ | ~~**Output:** Database integrity and ability to report on national goals as they relate to the NPDES permitting program.~~<br>~~**Electronically transmit data to EPA within 40 days, on-going**~~<br><br>~~**PMOS reporting can be via ICIS**~~ | | New Task - EPA accepts FDEP's comments per call 2/25/20<br><br>FDEP 05/04/20 Comment - if the changed was accepted per the 2/25/20 call, then this item should be removed. | | | |
| | | | | **GOAL 3: RULE OF LAW AND PROCESS** | *40 CFR Parts 122 - 133 and 400 – 699)* | | | | | | |
| | | | | **Objective 3.1: Compliance with the Law** | **Output: Effective NPDES permits** | | | | | | |
| | | | | ***106 Compliance Assurance - Some P&C's were deleted or moved to Appendix C*** | | | | | | | |
| 106 | Enforcement | DWRM | 6 | Copies of Inspection Reports and Enforcement Actions will be pulled from OCULUS by EPA. If EPA is unable to pull data from Oculus, then copies of Inspection Reports will be submitted in either hard copy or electronic form. | Regional Priorities | As requested | | | Jennifer Walters<br>850-245-7640<br>Jennifer.Walters@floridadep.gov | Tara Houda<br>404-562-9762<br>Houda.Tara@epa.gov | |
| 106 | Enforcement | DWRM | 18 | Submit an updated EMS to EPA if any revisions are made to the EMS. | Regional Priority | Submit Updated EMS. 60 days after finalizing revisions | | | Jennifer Walters<br>850-245-7640<br>Jennifer.Walters@floridadep.gov | Tara Houda<br>404-562-9762<br>Houda.Tara@epa.gov | |
| 106 | Enforcement | DWRM | 19 | Provide assistance on National Wet Weather Enforcement Strategy Implementation. EPA's wet weather initiatives are: CSOs, SSOs, stormwater, and CAFOs. EPA must conduct inspections and enforcement in these initiative areas. The States are requested to partner with EPA in the initiatives and assist EPA in reaching our goals. | Goal 3 of the Strategic Plan | As initiatives are conducted | | | Jennifer Walters<br>850-245-7640<br>Jennifer.Walters@floridadep.gov | Tara Houda<br>404-562-9762<br>Houda.Tara@epa.gov | |
| ~~106~~ | ~~Enforcement~~ | ~~DWRM~~ | ~~20~~ | ~~Consider the relationship between point source dischargers and drinking water intakes in setting inspection and enforcement priorities. Provide update on any activities related to this task.~~ | ~~National Program Guidance and Additional Program Guidance for Section 106~~ | | | New Task - EPA accepts FDEP's comments to remove | ~~Jennifer Walters<br>850-245-7640<br>Jennifer.Walters@floridadep.gov~~ | ~~Tara Houda<br>404-562-9762<br>Houda.Tara@epa.gov~~ | |
| | | | | **EVALUATION, REPORTING & QUALITY ASSURANCE** | | | | | | | |
| | | | | ***Underground Injection Control - P&C's were deleted or moved to Appendix C*** | | | | | | | |

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| Grant | Program | Division | FFY 2020 Task No. | DEP 2020 PPA Priorities & Commitments List | TO ADD<br>Basis for Commitment | Schedule/ Due Date | Florida DEP August 2019 Proposed Changes | EPA Comment | DEP Contact | EPA Contact | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | **GOAL 1: A CLEANER, HEALTHIER ENVIRONMENT** | | | | | | | |
| | | | | **Objective 1.2: Provide for Clean and Safe Water** | | | | | | | |
| | | | | ***DWP - Whole Effluent Toxicity - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***Monitoring Program - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| 106 | Monitoring | DEAR | 13 | State's Evaluation: The State will evaluate its monitoring and assessment program through processes/activities such as staff input, peer review, etc. and document how well the state's monitoring designs and systems meet its objectives and decision needs. Output: Brief summary of the results/findings of the State self-assessment of monitoring & assessment program. For | Program Priority & Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003); 40 CFR 130 | Annually on 12/31 | | | Julie Espy, (850) 245-8416, Julie.Espy@dep.state.fl.us Jay Silvanima, (850) 245-8507, James.Silvanima@dep.state.fl.us | Christopher J. McArthur, (404) 562-9391, mcarthur.christopher@epa.gov | |
| | | | | ***303(d) TMDL Program - Some P&C's were deleted or moved to Appendix C*** | | | | | | | |
| 106 | TMDL-303d | DEAR | 4 | **TMDL Alternatives (Optional):**<br>Based on the new CWA 303(d) Vision, a State has the option to pursue approaches other than TMDLs to meet water quality standards for impaired waterbodies. In these cases, the State will provide to EPA the information to support these alternatives for the 303(d) List. Alternatives may include, but are not limited to, Category 5R or Category 4B listings. | EPA Strategic Plan<br>Program Activity Measure (PAM)<br>WQ-27<br>EPA Long-Term Vision | Alternatives should be submitted to EPA in accordance with the State's TMDL Development | | | Erin Rasnake 850-245-8338<br>Erin.Rasnake@dep.state.fl.us;<br>Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us; | Laila Hudda<br>404-562-9007<br>hudda.laila@epa.gov | |
| 106 | TMDL-303d | DEAR | 5 | **Final TMDL Submittals:**<br>The State will submit to EPA final TMDLs, which include: (1) a responsiveness summary; (2) technical support information such as the applicable water quality standard, source assessment, data analysis, water quality monitoring and modeling assumptions, and calculation | EPA Strategic Plan<br>Program Activity Measure (PAM)<br>WQ-27<br>EPA Long-Term Vision | Final TMDLs should be submitted to EPA in accordance with the State's TMDL | | | Erin Rasnake 850-245-8338<br>Erin.Rasnake@dep.state.fl.us;<br>Ansel Bubel<br>850-245-8072 Ansel.Bubel@dep.state.fl.us | Laila Hudda<br>404-562-9007<br>hudda.laila@epa.gov | |
| 106 | TMDL-303d | DEAR | 6 | **TMDL Status Updates:**<br>The State will participate in regular conference calls with EPA to discuss TMDLs scheduled for development in FY19 and any revisions to the FY19 Development Schedule dates and cause for revision. | Program Priority | Ongoing | | | Erin Rasnake 850-245-8338<br>Erin.Rasnake@dep.state.fl.us;<br>Ansel Bubel<br>850-245-8072 Ansel.Bubel@dep.state.fl.us | Laila Hudda<br>404-562-9007<br>hudda.laila@epa.gov | |
| | | | | ***305(b)/303(d) Assessment Program*** | | | | | | | |
| 106 | TMDL-303d | DEAR | 1 | BMAP & Restoration Effectiveness:<br>The State will monitor watersheds where water restoration projects (e.g., FDEP-adopted Basin Management Action Plans) have been planned and/or implemented to validate/ verify WQ changes in those waterbody segments. Using data obtained before and after project | Program Priority\<br>2.2.1<br>SP-10<br>SP-11 | Annually on 12/31 | | | Kevin Coyne<br>850-245-8555<br>Kevin.Coyne@dep.state.fl.us | Catherine York<br>404-562-8065<br>york.catherine@epa.gov | |
| 106 | Assessment | DEAR | 2 | Third Party Data:<br>To enhance limited monitoring resources, and reduce duplication of efforts, the State will scientifically review "all existing and readily-available" data (FDEP & third party), for compelling evidence of water quality impairment or improvement and will use these data as indicators of water quality as appropriate. Where warranted, the State will monitor to supplement the available data to meet data requirements and thresholds for determining the waterbody's use support status and to confirm the actual water quality condition. The State will encourage other agencies and organizations to target monitoring to define baseline conditions or watershed improvement/restoration, where such monitoring is judged appropriate by State. | Program Priority<br>2.2.1 | Biennially on 4/1 | | Recommend task modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br><br>Integrated Report (IR) and the Consolidated Assessment and Listing Methodology (CALM): In even calendar years, the State shall submit its biennial 305(b) report and Section 303(d) List as part of the Integrated 305(b)/303(d) Report (IR). The state will also provide updates to and refine the comprehensive, scientifically valid assessment and listing methodology documentation to support the state's determination to list or not list waters [40 CFR 130.7 (b)(6) (i- iv)]. The documentation should include:<br>1) explain how the State identifies and considers all existing and readily available data and information;<br>2) articulate the basics of the quality assurance and quality control criteria used to evaluate data submitted by outside entities; and<br>3) explain the analytical approaches, including statistical analyses, used to infer true segment conditions from all valid existing and readily available information.<br><br>The State will document updates to the CALM used to develop their IR. As recommended in EPA IR guidance, the CALM should document the listing/delisting decision process and should be consistent with applicable water quality standards and with sound science and statistics. Prior to submission of its IR, the decision process the State describes in the methodology should provide all stakeholders with the opportunity to understand exactly how assessment decisions are made.<br><br>Basis for Task: 40 CFR 130.7 and 40 CFR 130.8; IR Guidance<br>Output: The State's IR and CALM.<br><br>CALM<br>10/1, odd numbered years; IR: 4/1, even numbered years<br>DEP held a teleconference on January 30 with EPA Region IV staff to discuss uploading the "starting point" for the initial ATTAINS. DEP is working on this upload and will follow up with EPA on next steps for EPA's approval and additional information needed. DEP is working on the 2020 IR report for submittal by April 1, 2020. As part of the ATTAINS upload, DEP has provided EPA an assessment and listing guidance document to support the state's decision to list waters on the 303(d) list and those waters not being listed. DEP has not migrated to the CALM and is interested in working with EPA on how the format of documentation, elements needed, and coordination efforts to accomplish this task | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us;<br>Kevin O'Donnell<br>850-245-8469<br>Kevin.Odonnell@dep.state.fl.us | Catherine York<br>404-562-8065<br>york.catherine@epa.gov | |
| 106 | Assessment | DEAR | 3 | Public Water Supply Monitoring and Data Use:<br>EPA encourages states to allocate a reasonable share of water quality monitoring resources to assess attainment of the public water supply use. States should consider using water quality or compliance monitoring data collected by public water systems in assessing the quality, and | National Program Guidance and Additional Program Guidance for Section 106 | Annually on 12/31 | | | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us;<br>Kevin O'Donnell | Catherine York<br>404-562-8065<br>york.catherine@epa.gov | |
| | | | | Moved - Now in Monitoring - Line 293 | | | | | | | |
| 106 | Assessment | DEAR | 5 | Data Management, Assessment Database (ADB):<br>The State will record assessment decisions for Assessment Unit's (AU) using the most current version of ADB or an ADB-equivalent database. ADB equivalent databases must conform to | 2006 IR Guidance and Updates | Annually on 4/1 | | | Julie Espy 850-245-8416<br>Julie.Espy@dep.state.fl.us Kevin O'Donnell<br>850-245-8469 Kevin.Odonnell@dep.state.fl.us | Catherine York<br>404-562-8065<br>york.catherine@epa.gov | |
| 106 | Assessment | DEAR | 6 | Data Analysis and Assessment Methods:<br>The State will document updates to, and refine, its comprehensive, scientifically valid assessment methods for data and/or waterbody type, including use of State and third party data, considering trends, and incorporating the full range of available data. Output: The State's current Listing and Assessment Methodology | Program Priority & Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | Annually on 10/1 | | | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us;<br>Kevin O'Donnell<br>850-245-8469<br>Kevin.Odonnell@dep.state.fl.us | Catherine York<br>404-562-8065<br>york.catherine@epa.gov | |
| 106 | Assessment | DEAR | 7 | Reporting - § 305(b) or (ADB):<br>In even calendar years, the State shall submit its biennial 305(b) report and Section 303(d) List pursuant to CWA § 305(b) as part of the Integrated 305(b)/303(d) Report.<br><br>Each year, the State shall submit its annual electronic update of key monitoring information along with ADB-compatible assessment data, including any 303(d) List updates, for all the waters assessed during the previous year. The geo-referenced data files will include the minimum data elements in accordance with the Appendices A & B of the 2006 Integrated Report Guidance.<br>EPA has been and will continue to provide assistance in consolidating and updating FDEP's assessment data to input into the new ATTAINS system. Once the consolidation and the upload of the recently approved list into the ATTAINS system is complete, the state will be responsible to update their data in ATTAINS. | CWA § 303(d) and 305(b), IR Guidance, 40 CFR 130.8(d)<br>SP-10<br>SP-11 | Biennially on 4/1 | | Recommend task language modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br><br>Integrated Reporting (IR) Assessment Attribute Data and Geo-referencing:<br>The State will provide electronic documentation of State water quality assessment decisions, attribute data, and geospatial data. This should consist of a complete database using required EPA data elements and schema, including waterbody segmentation changes for current and previous cycles. The State will also provide geo-referenced data files depicting the location of every Assessment Unit in the assessment database, submitted in the form of point, line and/or polygon Geographic Information System (GIS) layers or NHD reach indexing tables.<br><br>For the 2020 IR cycle, the redesigned Assessment and Total Maximum Daily Load (TMDL) Tracking and Implementation System (ATTAINS) system will replace the existing Assessment Database (ADB) systems, as well as incorporate the ATTAINS Web Express system used for submitting data to EPA and entering State statistical survey summary information. This system will provide one interface and data model for all IR information and will allow states to enter data via batch upload, direct data entry or through Exchange Network (EN) web services. States are encouraged to submit attribute data in draft form to ATTAINS as the system will streamline EPA review of the 303(d) List and will be the system of record for tracking strategic plan measures.<br><br>Basis: 40 CFR 130.7 and 130.8; IR Guidance;<br>Output: IR Assessment Attribute Data and GIS files in ATTAINS<br>DEP held a teleconference on January 30 with EPA Region IV staff to discuss uploading the "starting point" for the initial ATTAINS. DEP is working on this upload and will follow up with EPA on next steps for EPA's approval and additional information needed. DEP is finalizing the 2020 IR report and submittal is | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us;<br>Kevin O'Donnell<br>850-245-8469<br>Kevin.Odonnell@dep.state.fl.us | Catherine York<br>404-562-8065<br>york.catherine@epa.gov | |
| 106 | Assessment | DEAR | 8 | State's Evaluation: The State will evaluate its monitoring and assessment program through processes/activities such as staff input, peer review, etc. and document how well the state's monitoring designs and systems meet its objectives and decision needs. | Program Priority & Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | Annually on 12/31 | | | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us;<br>Kevin O'Donnell<br>850-245-8469 | Catherine York<br>404-562-8065<br>york.catherine@epa.gov | |
| | | | | ***Groundwater Program - Some P&C's were either deleted or moved to Appendix C*** | | | | | | | |
| 106 | GRDWTR | DEAR | 2 | Use a portion of the water quality monitoring resources to assess attainment of public water supply use and consider using water quality or compliance monitoring data collected by public water systems in assessing water quality and determining impairment. | Office of Water National Program Guidance (NPG) | | | | Julie Espy<br>850-245-8416<br>Julie.Espy@dep.state.fl.us;<br>Kevin O'Donnell | Jason Meadows<br>404-562-9399<br>Meadows.JasonB@epa.gov | |
| | | | | ***Watershed Protection*** | | | | | | | |
| 106 | GRDWTR | DEAR | 1 | Watershed Protection: The State commits, as appropriate and as resources allow, to direct 106 funded program activities to support development and implementation of BMAPs to result in | EPA Strategic Plan: Provide for Clean and Safe Water (Objective 1.2). | Ongoing | | | Kevin Coyne<br>850-245-8555 | Veronica Fasselt<br>404-562-9471 | |
| 106 | GRDWTR | DEAR | 1 | Assist EPA to identify SP-10, SP-11, and SP-12 accomplishments in Florida. Work with the Watershed Coordinator to provide draft SP-12 success stories. | EPA Strategic Plan: Provide for Clean and Safe Water (Objective 1.2).<br>(Measures SP-10, 11, 12) | Ongoing | | | Kevin Coyne<br>850-245-8555<br>Kevin.Coyne@dep.state.fl.us; | Veronica Fasselt<br>404-562-9471<br>fasselt.veronica@epa.gov | |
| | | | | ***Water Quality Standards Program - Some P&C's were either deleted or moved to Appendix C*** | | | | | | | |
| 106 | WQSP | DEAR | 4 | Toxic and Conventional Pollutant Criteria:<br>The State will review and revise as necessary the criteria for toxic pollutants currently adopted by the State in accordance with the EPA's updated human health and aquatic life criteria. In addition, the State will provide a progress report regarding DEP's consideration/adoption of any designated use changes for specific waterbodies, if applicable. For both criteria and designated uses, the state will engage public participation under the requirements of 40 CFR part 25. Updated EPA criteria recommendations can be found on the EPA's website at http://water.epa.gov/scitech/swguidance/standards/criteria/current/index.cfm. | Program Priority<br>303(c)<br>WQ-3a | Three years after the previous triennial review | | DEP is addressing EPA recommendations for aquatic life-based water quality criteria as part of the ongoing Triennial Review of Water Quality Standards, but revisions to human health-based water quality criteria are on hold pending a state-wide survey of fish consumption rates, which is being conducted under contract by UF. We are following public participation requirements for the Triennial Review rulemaking. | Daryll Joyner 850-245-8431<br>daryll.joyner@dep.state.fl.us<br>Ken Weaver<br>850-245-8414<br>Kenneth.Weaver@dep.state.fl.us | Katie Snyder,404-562-9840,<br>Snyder.Katherine@epa.gov | |
| ~~106~~ | ~~WQSP~~ | ~~DEAR~~ | ~~NEW TASK~~ | ~~Site Specific Criteria: The State will continue to develop site-specific water quality criteria to better protect the waterbodies in Florida and engage public participation under the requirements of 40 CFR part 25.~~ | ~~303(c)~~ | ~~As appropriate~~ | | EPA agrees to delete per call 2/25/20 | Daryll Joyner 850-245-8431<br>daryll.joyner@dep.state.fl.us<br>Ken Weaver<br>850-245-8414<br>Kenneth.Weaver@dep.state.fl.us | Katie Snyder,404-562-9840,<br>Snyder.Katherine@epa.gov | |
| | | | | **EVALUATION, REPORTING & QUALITY ASSURANCE** | | | | | | | |
| | | | | ***Underground Injection Control - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***303(d) TMDL Program - P&C's were deleted or moved to Appendix C*** | | | | | | | |
| | | | | ***Monitoring Program - Some P&C's were deleted or moved to Appendix C*** | | | | | | | |
| 106 | Monitoring | DEAR | 4 | Monitoring Workplan:<br>The State shall submit its projected annual monitoring and assessment workplan for the current fiscal year period, consistent with the comprehensive monitoring strategy, including §106, 104, 604 and other monitoring activities. This plan should contain the number of sites to be sampled for each of the following water quality data: ambient water chemistry, biology, habitat, fish tissue, toxicity and sediment chemistry. Output: Provide all monitoring Workplan documents that were created or updated in the previous fiscal year and confirm the applicability of any unchanged documents, including Strategic Monitoring Plans and Status & | Program Priority, 40 CFR 130, WQ-SP13a.N11 | Before April 01, annually | | | Julie Espy 850-245-8416<br>Julie.Espy@dep.state.fl.us; Kevin O'Donnell<br>850-245-8469 Kevin.Odonnell@dep.state.fl.us Jay Silvanima<br>850-245-8512 James.Silvanima@dep.state.fl.us | Christopher J. McArthur, (404) 562-9391,<br>mcarthur.christopher@epa.gov | |
| | | | | ***Water Quality Standards Program - P&C's were deleted or moved to Appendix C*** | | | | | | | |

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| Grant | Program | FFY 2020 Task No. | Report Title | Report Type/Description | Basis for Reporting Requirement | Submittal Frequency | Deadlines | Where/How to Submit | Florida DEP August 2019 Proposed Changes | EPA Comments | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| ALL | ALL | | PPG Financial Status Report | Submit the final Financial Status Report (FSR) for all grants covered under the PPG. | 40 CFR §30.52 | Annually | December 31st | | | | |
| CAA | DARM | IAQ-5 | Data Requirements Rule Update | Submit an annual report to the EPA Regional Administrator by July 1 of each year that documents the annual SO2 emissions of each applicable source in each such area and provides an assessment of the cause of any emissions increase from the previous year. | 40 CFR §51.1205 | Annually | July 1st | Submit to EPA R4's Regional Administrator | | | |
| CAA | DARM | IAQ-8 | Update RACT/BACT/LEAR Clearinghouse (RBLC) | Update the database to reflect PSD permitting activities by entering BACT/LAER determinations for major sources. | CAA 112 | As Required | After PSD permit is finalized | Update RBLC | | | |
| CAA | DARM | IAQ-10 | Air Monitoring Data Certification | Letter attesting that the previous year's ambient data has been uploaded to AQS and it has gone through the normal validation process; applicable AQS reports must be included. | 40 CFR 58.15 | Annually | May 1st | Submit to EPA R4's Regional Administrator | | | |
| CAA | DARM | IAQ-11 | CAA Monitoring Data | Data used to propose and make designations or findings of attainment. | 40 CFR 58.16 | Quarterly | Within 90 days after the end of the quarterly reporting period:<br>March 31st<br>June 30th<br>September 30th<br>December 31st | Upload into AQS | | | |
| CAA | DARM | IAQ-12 | CAA Monitoring Network Plan | The statewide ambient monitoring network plan provides an evaluation of the regulatory requirements of the network and provides intended actions, real or proposed, during the next 18 months to address those requirements. The plan should be consistent with requirements outlined in 40 CFR Parts 50, 53, and 58. Local Agencies will coordinate with the State in the development of this plan. Include in the annual ambient monitoring network design plan a certified evaluation of the Agency's ambient monitors and auxiliary support equipment and categorize the condition of the equipment as "Good," "Fair," or "Poor." Please indicate which equipment pieces are not in everyday use (e.g., spare/back-up equipment stored in a lab or warehouse.) Auxiliary equipment includes items such as calibrators, data loggers, meteorological equipment, modems, etc. The agency is requested to replace equipment categorized as "Poor." Also included in the plan is any planned air toxics monitoring, and if no monitoring is planned, clearly state, "No monitoring will be performed." | 40 CFR 58.10 | Annually | July 1st | Submit to EPA R4's Regional Administrator | | | |
| CAA | DARM | IAQ-13 | CAA Quality Management Plan | QMP will be submitted to EPA for approval at least 180 days prior to the expiration | 40 CFR Part 58 | As Required | As Required | Submit to EPA R4 LSASD | | | |
| CAA | DARM | IAQ-15 IAQ-24 | CAA Quality Assurance Plan | QAPP will be submitted to EPA for approval within 180 days of expiration | 40 CFR Part 58 | As Required | As Required | Submit to EPA R4 LSASD | | | |
| CAA | DARM | IAQ-21 | CAA Monitoring Data | Notify EPA by mail or e-mail no more than 90 days after the end of the quarter of any monitor not meeting the 75% data recovery requirement. | Corrected timeframe/EPA contact information | Corrected timeframe/EPA contact information | If applicable, notify EPA within 90 days after the end of the quarterly reporting period. | Submit to EPA R4's Daniel Garver | | | |
| CAA | DARM | IAQ-26 | CAA Ambient Air Toxics Monitoring Data | If applicable, for all ambient air toxics monitoring data collected, enter quality assured and associated QA/QC data into the AQS database system no later than 180 days from the end of the quarter. | Prior Air Planning Agreement | Quarterly | Within 180 days after the end of the quarterly reporting period:<br>April 30th<br>July 31st<br>October 31st<br>January 31st | Upload into AQS | | | |
| CAA | DARM | IAQ-28 | Delegation of NSPS and NESHAP | Notify Region 4 by submitting rule adoption documentation within 60 days of adoption. | Changed dates/EPA contact information | Changed dates/EPA contact information | Within 60 days of adoption | Submit to EPA R4's Katy Lusky | | | |
| CAA | DARM | IAQ-30 | Alternative Monitoring & Testing Procedures for MACT sources | Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and provide copies of approvals to the Region upon issuance.<br>This reporting requirement commitment, provides that FDEP will be reporting semi-annually the number of alternative monitoring & testing procedures processed/approved. This report will serve as a check and balance to help EPA ensure that we have received copies of all the Part 63 approvals reflected in the semi-annual reports. | 40 CFR 63.91(g)(1)(ii) | Upon issuance | Upon issuance | Submit to EPA R4's Katy Lusky | | | |
| CAA | DARM | IAQ-31 | 111(d) and 129 State Plan Annual Report | Submit annual reports on progress of sections 111(d) and 129 plans | 40 CFR 60.25(e) and (f) | Annually | November 15th | Submit to EPA R4's Katy Lusky | | | |
| CAA | DARM | M&E-1 M&E-2 | CAA Compliance and Enforcement Data | Compliance and Enforcement data upload into ICIS, including Federally Reportable Violations. Data used for EPA's Enforcement and Compliance History Online (ECHO). | Section 114(a)(1) CAA | Annually | January 30th | Upload into ICIS | | | |
| CAA | DARM | M&E-5 | Asbestos NESHAP Activities | Report the following asbestos NESHAP activities 1) number of notifications received; 2) number of inspections; 3) non-notifier activity if applicable; 4) number of non- penalty enforcement actions; 5) number of enforcement actions with an assessed penalty; and 6) total penalty assessment. | 40 CFR 35.107 and 35.115 | Semi-Annually | 45 days after each fiscal 6-month period:<br>May 15th<br>November 15th | Submit to EPA R4's Pamela Storm | | | |
| CAA | DARM | CCI-1 | Emissions Inventory System Upload - Hazardous Air Pollutants | The EPA requests that State, Local, and Tribal Air Agencies submit emissions information updates for major point sources to EIS database annually or as requested by the EPA Office of Air Quality Planning and Standards. Information on the EIS Gateway can be found at: http://www.epa.gov/ttn/chief/eis/gateway/index.html. The State and Local National Air Toxics Assessment (NATA / NEI) contact in the Air Data and Analysis Section should be notified via e-mail upon submittal to EPA. | Air Emissions Reporting Requirements (AERR) (40 CFR Part 51 Subpart A)<br>CAA 112 | Annually | January 15th | Upload into EIS, and for major point sources notify the State and Local contact in the Air Toxics Assessment and Implementation Section via e-mail upon submittal to EPA (Sally Dombrowski, Emissions Inventory and Analysis Group), or for CAP point source emissions inventory notify the Chief of the Air Quality Modeling and Transportation Section. | | | |
| CAA | DARM | CCI-2 | Emissions Inventory System Upload - Criteria Air Pollutants | Develop and submit to EPA, emissions inventory information for all applicable point sources, CAP pollutants and time frames consistent with the AERR Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The CAPs point source emissions inventories should be submitted to EPA Headquarters through the EIS Gateway by no later than December 31st each year. Early submittals are recommended. Information on the EIS Gateway can be found at: http://www.epa.gov/ttnchie1/eis/gateway/. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2017 submittal is made to the EIS. | Air Emissions Reporting Requirements (AERR) (40 CFR Part 51 Subpart A) | Annually | January 15th | Upload into EIS, and for major point sources notify the State and Local contact in the Air Toxics Assessment and Implementation Section via e-mail upon submittal to EPA (Sally Dombrowski, Emissions Inventory and Analysis Group), or for CAP point source emissions inventory notify the Chief of the Air Quality Modeling and Transportation Section. | | | |
| CAA | DARM | CCI-4 | Annual Summary Report (105) | The Annual Summary Report outlines the accomplishments of the agency over the previous year by evaluating the performance of:<br>● Implementing the NAAQS;<br>● Implementing the Regional Haze Program;<br>● Attaining and Maintaining the Other NAAQS;<br>● Supporting NAAQS Cross Cutting Issues;<br>● Implementing the New Source Review (NSR) Programs;<br>● Implementing the Ambient Air Monitoring Program;<br>● Reducing Air Toxics;<br>● Implementing the Compliance Monitoring and Enforcement Programs (includes a narrative summary of compliance assistance activities for non major sources); and<br>● Developing Emission Inventories. | 40 CRF 35.115 | Annually | December 31st | Submit to EPA R4's Administrative Project Officer | | | |
| CAA | DARM | Added | 5-year Network Assessment Plan | Plan provides an evaluation of the strengths and weaknesses of the network and provides intended actions for the next 5 years to address any concerns. | 40 CFR 58.10 | Every 5 years | July 1, 2020 | Submit to EPA R4's Regional Administrator | | | |

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| Grant | Program | FFY 2020 Task No. | Report Title | Report Type/Description | Basis for Reporting Requirement | Submittal Frequency | Deadlines | Where/How to Submit | Florida DEP August 2019 Proposed Changes | EPA Comments | DWM RESPONSE | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ALL | ALL | | PPG Financial Status Report | Submit the final 2020 Financial Status Report (FSR) for all grants covered under the PPG. | 40 CFR §30.52 | Annually | December 31st | | | | | |
| RCRA | DWM | p.3 Dev&Adm | RCRA End-of-Year | Submit 2020 End-of-Year Report summarizing the state's accomplishments to include:<br>• Program Development and Authorization accomplishments;<br>• Compliance Monitoring & Enforcement accomplishments;<br>• Permitting accomplishments;<br>• Corrective Action accomplishments;<br>• Actual versus Estimated Costs;<br>• Compliance Assistance Outreach;<br>• TSD Inspection Lists;<br>• Training Summary & Details. | 2 CFR 35.115<br>2 CFR 200.328 | Annually | December 31st | Submit to the RCRA Program and Materials Management Branch Chief | | The state's schedule for submitting Checklists that the state plans to seek authorization for and the schedule for submitting draft statutory and/or regulatory changes for EPA to review were deleted from this section. This information is also not listed in "2020 Appendix A final draft". | This program authorization checklist measure was not applicable to Florida since the Department filed its program revision application for these regulations in September 2019. FDEP submitted Program Revision Application for Clusters 26 & 27 on September 24, 2019. | |
| RCRA | DWM | p.3 Dev&Adm | RCRA Biennial Report | Report data received from the regulated community addressing the requirements of RCRA 3002(a)(6) and RCRA 3004(a)(2). | 40 CFR 262 | Biennially | November 2019 | Upload into RCRAInfo | | | | |
| RCRA | DWM | p.13 Corr Act | RCRA Permitting and Corrective Actions Data | Report to EPA via translation of the state's permitting and corrective actions data to RCRAInfo. | 2 CFR 200.328 | On going | | Upload into RCRAInfo | | Does not contain any RCRA permitting projections nor commitments. In order to set the FY2020 RCRA permitting commitments with the EPA HQs, Region 4 needs commitment numbers from our States. Region 4 requests from Florida to provide the number of RCRA permit renewals that the State would commit to issuing during FY2020. The list of facility names should be provided with the response to this comment. Also, does not contain any GPRA corrective action projections nor commitments. In order to finalize the FY2020 GPRA corrective action national targets with EPA HQs, Region 4 requests annual commitments from our States. Region 4 requests that Florida provide the number of GPRA commitments for corrective action (CA725, CA750, CA550, CA800, CA900/999) that the State projects as accomplishments during FY2020. The list of facility names should be provided with the | FDEP FFY2020 Permitting, GPRA, and Compliance commitments are listed in Appendix D. | |
| RCRA | DWM | p.3 Dev&Adm | RCRA Compliance and Enforcement Data | Report to EPA via translation of the state's compliance and enforcement data to RCRAInfo. | 2 CFR 200.328 | At least Monthly | | Upload into RCRAInfo | | | | |

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| Grant | Program | FFY 2020 Task No. | Report Title | Report Type/Description | Basis for Reporting Requirement | Submittal Frequency | Deadlines | Where/How to Submit | Florida DEP August 2019 Proposed Changes | EPA Comments | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| ALL | ALL | | PPG Financial Status Report | Submit the final Financial Status Report (FSR) for all grants covered under the PPG. | 40 CFR §30.52 | Annually | December 31st | | | | |
| UIC | DWRM | S,I,QA-4<br>Rprt-3<br>Rprt-4<br>Rprt-5<br>Rprt-6 | UIC Quarterly Program Reports | Submit UIC's Quarterly Program Report to include:<br>● Mechanical Integrity (MI)<br>> number of MI tests conducted,<br>> number of deep injection wells (Class I, II and III) that lost MI between April 1st and March 31st of the grant's FY,<br>> number that lost MI between said dates returned to compliance within 180 days; and<br>● Quarterly Exceptions report. | 40 CFR §144.8<br>SDW-07 | Quarterly | January 25th<br>April 25th<br>July 25th<br>October 25th | Submit to Jason Meadows in EPA R4's UIC Program | | | |
| UIC | DWRM | ClassV-2<br>ClassV-3 | UIC Semi-Annual Program Reports | Submit UIC's Semi-Annual Program Report to include items in the *UIC Quarterly Program Reports* in addition to:<br>● Compliance Evaluation;<br>● Compliance Evaluation, Significant Non-Compliance | 40 CFR §144.8<br>SDW-08 | Semi-Annually | October 25th<br>April 25th | Submit to Jason Meadows in EPA R4's UIC Program | | | |
| UIC | DWRM | Aqfr-1<br>ClassV-1<br>Data-1<br>Data-2<br>PI,T,TA-1<br>Rprt-1 | UIC Annual Program Report | Submit UIC's Annual Program Report to include items in the *UIC Quarterly and Semi-Annual Program Reports* in addition to a narrative to include:<br>● an inventory of all wells including well class, type and status;<br>● all aquifer identification and exemption activities;<br>● specific Class V initiatives;<br>● status of progress towards flowing data to the national database;<br>● public outreach activities conducted; and<br>● meetings and trainings attended. | 40 CFR §144.8<br>EPA Region 4 Requirement<br>EPA Headquarter Guidance | Annually | October 25th | Submit to Jason Meadows in EPA R4's UIC Program | | | |

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| Grant | Program | FFY 2020 Task No. | Report Title | Report Type/Description | Basis for Reporting Requirement | Submittal Frequency | Deadlines | Where/How to Submit | Florida DEP August 2019 Proposed Changes | EPA Comments | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| s | ALL | | PPG Financial Status Report | Submit the final Financial Status Report (FSR) for all grants covered under the PPG. | 40 CFR §30.52 | Annually | December 31st | | | | |
| PWSS | DWRM | P-15 | Capacity Development Report | Report to EPA on the implementation of the Capacity Development strategy to assist public water systems in acquiring and maintaining technical, managerial, and financial capacity. | §1420 (c)<br>EPA Strategic Plan References:<br>2.1.1, SP-1 and SP-2 | Annually | December 31st | Submit to the EPA Drinking Water Section Capacity Development Coordinator and copy the State Program Manager | | | |
| PWSS | DWRM | P-15 | Triennial Capacity Development Report | Report to the Governor every three years on the Capacity Development strategy to assist public water systems in acquiring and maintaining technical, managerial, and financial capacity. | §1420 (c)<br>EPA Strategic Plan References:<br>2.1.1, SP-1 and SP-2 | Every 3 years | September 30th | Submit to the Executive Office of the Governor and copy EPA | | | |
| PWSS | DWRM | P-17 | Operator Certification Program Annual Submittal | Submittal covers nine baseline standards established by EPA for state Operator Certification Programs. Internal and external program reviews are to be conducted every 3 & 5 years respectively. | F.R. Vol. 64, Number 24<br>EPA Strategic Plan Reference: 2.1.1 | Report due Annually; Program reviews are reported as part of the annual submittal during the year in which they are completed | May 1st | Submit to the EPA Drinking Water Section Operator Certification Coordinator and copy the State Program Manager | | | |
| PWSS | DWRM | P-12<br>E-1 | PWSS Inventory and Compliance & Enforcement Data Reporting | Report the State's PWSS inventory to the Safe Drinking Water Information System/Federal (SDWIS/FED), according to the Revised SDWIS/FED Inventory Reporting Requirements for SDWIS/FED. The inventory will be used to calculate the next fiscal year's grant allotment and will be frozen as of January 1st annually. Also report violations and enforcement actions via upload to SDWIS/FED. | 40 C.F.R. Parts 141 and 142<br>EPA Guidance "Consolidated Summary of Reporting Requirements for SDWIS/FED<br>EPA Strategic Plan Reference:<br>2.1.1, SP1, SP2<br>5.1.3; SDWA 02 | Inventory-Annually<br><br>Violations & Enforcement Actions-Quarterly, but no later than 45 days following the end of the quarter. | Annual: December 31st<br><br>Q1: February 15th<br>Q2: May 15th<br>Q3: August 15th<br>Q4: November 15th | Upload to SDWIS/FED | | | |
| PWSS | DWRM | E-7 | PWSS Priority List Status Report | Provide a written response to EPA regarding the status of PWSs identified as priorities by the Enforcement Response Policy's Enforcement Targeting Tool. | National Priority<br>Regional Priority<br>EPA Strategic Plan Reference:<br>5.1.3; SDWA 02 | Quarterly | Within 30 days of State's receipt of EPA's list | Submit to EPA Region 4 Drinking Water Section | | | |
| PWSS | DWRM | | | NEW TASK: PWSS End-of-Year Report": Provide voluntary updates on the status of assistance provided to EPA. | SDWA §1433, AWIA Section 2013 requirement that all CWSs complete a water<br>system risk assessment between March 2020 to June 2021, depending on system size | | December 31st | Submit to EPA Region 4 Drinking Water Section | | | |
| PWSS | DWRM | P-3<br>P-6<br>P-7<br>P-8<br>P-11<br>P-14<br>P-16<br>P-20 | PWSS End-of-Year Report | Submit PWSS' End-of-Year Report to include:<br>● sanitary surveys based on the cycle for water system size, source water, and type;<br>● water system design and construction plan and specification review program activities;<br>● a summary ensuring newly permitted public water systems have design/construction capable of compliance with present and future SDWA regulations;<br>● activities related to the maintenance of records for all rule/policies;<br>● a summary of the community PWSs that are allowed to monitor less frequently than monthly and non-community PWSs that are allowed to monitor less frequently than quarterly (*Reduced monitoring only allowed by FDEP for transient non-community water systems from a quarterly to an annual basis (2012 FL Statute change* );<br>● meetings and trainings attended;<br>● summary of voluntary commitments related to the UCMR 4 Partnership Agreement, as resources allow; and<br>● an updated list of public water systems (including location) that monitor ambient/raw water so that the monitoring data may be considered in assessing water quality and determining impairment. | 142.15(c)(2) (P-11) 141 Subpart D and 142 Subpart B (P-8)<br>142.10(b)(5)(P-6)<br>Regional Priority<br>141.21(d), 142.16(b)(3) and 142.16(o) (P-3)<br>EPA Strategic Plan References:<br>2.1.1, SP-1 and SP-2 (P-7), (P-14)<br>Program Priorities Guidance<br>EPA National Program Guidance<br>Coordinates with CWA 106 Workplan Task A-2 (P-20)<br>Partnership Agreement<br>141 Subpart E<br>EPA Strategic Plan Reference:<br>2.1.1 – optional participation (P-16) | Quarterly | September 30th | Submit to EPA Region 4 Drinking Water Section<br><br>EPA to pull completed sanitary surveys from SDWIS/FED | | | |
| 106 | DWRM | 8 | Substantial Implementation Report | Reports the percent of community water systems where risk to public health is minimized by source water protection and the percent of the population served by community water systems where risk to public health is minimized through source water protection. Definition of substantial implementation to determine "minimized risk". Narrative description and percent of CWS that have strategies in place and that are being implemented. | NPG Measure<br>SDW-SP4a and<br>SDW-SP4b | Annually | March 12th | Submit to EPA R4's Robert Olive | | | |
| 106 | DWRM | | | Submit the Groundwater Program's End-of-Year Comments to include:<br>● Ground Water Program participation/activities in relation to the State monitoring strategy;<br>● actions/measures that the State has taken to identify, prevent and abate sources of contamination/pollution;<br>● development, amendments, and rulemaking activities that are related to ground water resources;<br>● plans and activities designed to characterize ground water resources from a regional or statewide perspective;<br>● plans and activities to design and maintain a state ambient ground water monitoring network, while reporting results of monitoring program;<br>● other activities that seek to prevent, identify, reduce, or eliminate ground water pollution to include the objective, methods, deliverable outputs, and planned milestone schedule for each activity;<br>● activities to coordinate with surface water programs to ensure that potential contaminant sources are identified;<br>● specific activities to leverage resources using the multi-partner Source Water Collaborative;<br>● specific activities that support implementation of the State Source Water/Wellhead Protection Programs;<br>● description of activities relating to participation in education and outreach programs, as well as direct interactions with communities concerning activities/action plans to address ground water contamination;<br>● activities (other than source water/wellhead protection) that involve and promote coordination/collaboration with other programs and agencies; | | Annually | March 12th | Submit to EPA R4's Jason Meadows | | | |
| 106 | DWRM | 2<br>3<br>4<br>5<br>6<br>7<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>18 | 106 - Groundwater Program End-of-Year Comments | ● activities that specifically target and/or assist minority and low –income communities in ground water protection;<br>● activities that focus specifically on data acquisition, integrating ground water data with other environmental data, and/or increasing the accessibility of ground water data among different programs and agencies of the State and EPA; and<br>● a list of meeting attended that focus on ground water and source water protection issues. | NPG<br>Measure,<br>SDW-SP4a and SDW-4b<br>State & EPA Program Priorities | Annually | December 31st | Submit to EPA R4's Jennifer Shadle | | | |

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| Grant | Program | FFY 2020 Task No. | Report Title | Report Type/Description | Basis for Reporting Requirement | Submittal Frequency | Deadlines | Where/How to Submit | Florida DEP August 2019 Proposed Changes | EPA Comments | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| ALL | ALL | | PPG Financial Status Report | Submit the final Financial Status Report (FSR) for all grants covered under the PPG. | 40 CFR §30.52 | Annually | December 31st | | | | |
| ~~106~~ | ~~DWRM-STMWTR~~ | ~~1~~<br>~~2~~<br>~~5~~ | ~~NPDES Stormwater Annual Evaluation~~ | ~~The State will assist EPA to conduct Annual Evaluations of progress in implementing commitments by submitting the Stromwater Program's Annual Evaluation to include:~~<br>~~• the anticipated dates by which MS4s for phase I municipalities, MS4s for phase II municipalities (general and/or individual permits), and construction general permit permits will be noticed as draft for public review/comment and issued as final; or~~<br>~~• for each permit identified that has been expired for more than one year, provide the steps/measures that the State is taking to reissue the permit, the status of the draft permit, and proposed issuance date until the final permit is issued.~~ | ~~40 CFR 31.40(b)~~<br>~~40 CFR 35.115(a)~~<br>~~Strategic Plan References:~~<br>~~WQ-12a, WQ-13a, WQ-13c~~ | ~~Annually~~ | ~~December 31st~~ | ~~Submit to EPA R4's Water Division~~ | | Recommendation: delete due to National Water Program Guidance Change accepted | |
| ~~106~~ | ~~DWRM-STMWTR~~ | ~~3~~ | ~~Municipalities located in Targeted/Priority Watersheds Annual Reports~~ | ~~The State agrees to provide annual reports for municipalities located in targeted/priority watersheds.~~ | ~~Strategic Plan References:~~<br>~~SP-10, SP-11, SP-12~~ | ~~As Requested~~ | ~~Within 60 days of request~~ | ~~Submit to the requestor~~ | | Recommendation: delete due to National Water Program Guidance Change accepted | |
| 106 | ~~DWRM-STMWTR~~ | ~~4~~ | ~~Construction General Permit Activities~~ | ~~The State agrees to provide EPA with a list of the permitted activities covered by their construction general permit.~~<br>~~and include the following associated data:~~<br>~~— location of each activity (e.g., latitude, longitude).~~<br>~~— discharge information (e.g receiving waterbody or MS4 operator)~~ | ~~Strategic Plan References:~~<br>~~SP-10, SP-11, SP-12~~ | ~~As Requested~~ | ~~Within 60 days of the request~~ | ~~Submit to the requestor~~ | | Recommendation: delete due to National Water Program Guidance Change accepted | |
| 106 | DWRM-NPDESPermit | 5 | NPDES Permitting Annual Evaluation | The State will assist EPA to conduct Annual Evaluations of progress in implementing work plan commitments by providing status reports for each task under NPDES Permitting. | Program Priority<br>40 CFR 31.40 (b)<br>40 CFR 35.115 (a) | Annually | December 31st | Submit to the requestor | | | |
| 106 | DWRM-NPDESPermit | 1 | NPDES Permitting Electronic Reporting into ICIS | The State agrees to report % of all NPDES permits that are considered current (for this task, current = less than 180 days expired) by permit category and provide an explanation for any reported aggregate backlog greater than 15%:<br>a. Major municipals and industrials.<br>b. Minor municipals and industrials.<br>c. Individual concentrated animal feeding operations (CAFOs).<br>d. Non-stormwater general permits. | FY2015 KEY PERFORMANCE INDICATOR / Goal 2: Protecting America's Waters / Measure #5- NPDES Permits: percent of non-Tribal facilities covered by NPDES permits that are considered current.<br>Strategic Plan References: WQ-12a<br>WQ-13b<br>WQ-13d | Semi-Annually | June 1st<br>December 31st | Submit into ICIS | | | |
| ~~106~~ | ~~DWRM-NPDESPermit~~ | ~~2~~ | ~~NPDES Permitting Electronic Reporting into PMOS~~ | ~~The State agrees to keep the data in the Permit Management Oversight System (PMOS) up-to-date for high priority permits, MS4 permits, and for all general (generic) permits. Most importantly, issuance/expiration dates should be kept current. For general permits, also update the total # of facilities covered under each GP on a semi-annual basis.~~ | ~~Strategic Plan Reference:~~<br>~~WQ-12a~~<br>~~WQ-12b~~<br>~~WQ-13a~~<br>~~WQ-13b~~<br>~~WQ-13c~~<br>~~WQ-13d~~<br>~~WQ-19a~~ | ~~Semi-Annually~~ | ~~June 1st~~<br>~~December 31st~~ | ~~Submit into PMOS~~ | | EPA is in agrement to delete, per call 2/25/2020 | |
| 106 | Enforcement | 1.b.<br>1.c. | Inspection Plan | Prepare and submit a Compliance Monitoring Strategy (Inspection Plan in MOA) for FY19 (10/01/18-09/30/19). The Strategy shall be consistent with EPA Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy 2014 Revision if finalized prior to January 1, 2015. If the 2014 Revision is not finalized, then the Strategy shall be consistent with the Memorandum dated October 17, 2007. In this Strategy, the State should incorporate any compliance or enforcement topics or concerns developed as a part of the State's Priority Watershed Initiatives. | 40 C.F.R. § 123.26<br>FY-11-13 National Enforcement Initiatives Goal 5 of the 2011-2015 Strategic Plan<br>Draft or Finalized EPA Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy 2014 Revision | Semi-Annually | Draft: May 31st<br>Final: July 15th | Email to EPA R4's Tara Houda | | | |
| ~~106~~ | ~~Enforcement~~ | ~~2~~ | ~~Quarterly Noncompliance Report~~ | ~~Submit the Quarterly Noncompliance Report (QNCR) within 10 days of publication. Provide brief written annotations denoting compliance/ enforcement status when a QNCR listed permittee is determined to be in Significant Noncompliance (SNC) for 2 or more quarters by ICIS-NPDES. Execute and submit copies of draft and final enforcement actions, as requested.~~<br>~~*Dates dependent upon ICIS-NPDES operations; regulatory dates are noted.~~ | ~~40 C.F.R. § 123.45~~<br>~~Goal 2.2 and Goal 5 of the Strategic Plan~~ | ~~Quarterly~~ | ~~*Due dates are estimated and may vary depending on the generation and state notification date.~~<br>~~Q1: 12/15/19*~~<br>~~Q2: 03/17/20*~~<br>~~Q3: 06/16/20*~~<br>~~Q4: 09/15/20*~~ | ~~Email to EPA R4's Mary Mattox and Tara Houda~~ | | Change language in Col E: Region 4 will generate and review the Quarterly Noncompliance Report (QNCR) (major and minor facilities) and discuss any concerns with the State. This will provide the State an opportunity to correct any data discrepancies in ICIS before public dissemination of the report. Use of the QNCR will continue until such time that it is supplanted by the NPDES Noncompliance Report (NNCR).<br>EPA concurs with removing rows 10 & 11 since it appears to be the previous year's language that rows 18 & 19 were designed to replace. To fully address FDEP's comment, we would like to provide additional clarification that, at this time, the SNC list only includes individually permitted facilities, not ones under general permits. "Sources" does refer to "facilities".<br><br>FDEP 05/04/20 Comment – Since this change was accepted, this item now shows as "strikethrough". | |
| ~~106~~ | ~~Enforcement~~ | ~~3~~ | ~~SNC List (previously "Coordinator's Report")~~ | ~~The Coordinator's Report (previously Facilities Watch List) or equivalent oversight mechanism will be provided to the State on a quarterly basis. Within 15 days of being notified by EPA, the State shall execute a formal enforcement action, refer the facility to EPA for enforcement, or provide a written explanation of either why no formal action is appropriate or the type of formal action being taken, with a projected date of action. Execute and submit copies of draft and final enforcement actions, as requested.~~<br>~~*Due date may vary depending on the generation and state notification date.~~ | ~~National Initiative~~<br>~~Goal 2.2 and Goal 5 of the Strategic Plan~~ | ~~Quarterly~~ | ~~*Due dates are estimated and may vary depending on the generation and state notification date.~~<br>~~Q1: 01/04/20*~~<br>~~Q2: 03/30/20*~~<br>~~Q3: 06/29/20*~~<br>~~Q4: 09/28/20*~~ | ~~Email to EPA R4's Tara Houda~~ | | 1. Changed Report Title in Column D. 2. Change language in Col E: On a quarterly basis, Region 4 will provide the significant noncompliance (SNC) list for major and minor source permits to the State for comments and discussion. The State agrees to provide a written explanation for all major facilities on the report within 15 days of receipt. For the minor sources, the State agrees to work with EPA to address noncompliance issues in accordance with the SNC National Compliance Initiative (NCI) to reduce the SNC noncompliance rate. For major facilities, within 30 days of being notified by EPA of noncompliance or SNC list generation, the State agrees to execute a formal enforcement action, refer the facility to EPA for enforcement, or provide written explanation of either why no formal action is appropriate or the type of formal action being taken, with a projected date of action. The State will submit copies of draft and final enforcement actions, as requested. EPA concurs with removing rows 10 & 11 since it appears to be the previous year's language that rows 18 & 19 were designed to replace. To fully address FDEP's comment, we would like to provide additional clarification that, at this time, the SNC list only includes individually permitted facilities, not ones under general permits. "Sources" does refer to "facilities".<br><br>FDEP 05/04/20 Comment – Since this change was accepted, this item now shows as "strikethrough". | |
| 106 | Enforcement | 4 | Whole Effluent Toxicity Non-Compliance Report (WET Report) | The WET Report will be generated by EPA and provided to the State on a quarterly basis along with the FWL or equivalent oversight mechanism. Within 15 days of being notified by EPA of WET Report generation, the State shall provide a written explanation for all facilities on the report. This response shall include any additional test results for the facilities on the report that have not been entered into ICIS and/or have occurred since the date of the WET Report. The response shall also include a sufficient description of the enforcement history, present actions taken (formal and informal), including a summary of any TIE/TRE work conducted, and the dates that the violations were resolved or are expected to be resolved will be provided. The State shall execute and submit copies of draft and final enforcement actions, as requested. | Regional Priority<br>Goal 2 and Goal 5 of the Strategic Plan | Quarterly | *Due dates are estimated and may vary depending on the generation and state notification date:<br>Q1: 01/04/20*<br>Q2: 03/30/20*<br>Q3: 06/29/20*<br>Q4: 09/28/20* | Email to EPA R4's WET Coordinator Amanda Driskell and Tara Houda | | 1. Added Amanda Driskell as contact in Col I. 2. Change language in Col E: A WET report (sometimes referred to as the WET Watch List) will be generated by EPA and provided to the State on a quarterly basis along with the SNC list. The State agrees to provide a written explanation for all facilities on the report within 15 days of receipt. This response shall include any additional test results for the facilities on the report that have not been entered into ICIS and/or have occurred since the date of the WET Report. The response shall also include a sufficient description of the enforcement history, present actions taken (formal and informal), including a summary of any TIE/TRE work conducted, and the dates that the violations were resolved or are expected to be resolved. Change accepted | |
| 106 | Enforcement | 8.c. | CAFO/AFO Enforcement Actions | Submit hard or electronic copies of all CAFOs/AFOs enforcement actions including NODs, NOVs, AOs, AOCs and referrals. | 40 C.F.R. § 122.23<br>National Enforcement Initiatives | Quarterly | Q1: October 31st<br>Q2 : January 31st<br>Q3: April 30th<br>Q4: July 31st | Submit to EPA R4's Don Joe and Tara Houda | | | |
| 106 | g | 9.d.<br>9.e. | Industrial Pretreatment Program Quarterly Report | The Industrial Pretreatment Program shall submit a quarterly report (QR) electronically to the EPA PTC. The QR shall provide the total number of SIUs permitted by active approved POTW pretreatment programs as of the end of the quarter, provide an update on developing programs, and identify POTWs in reportable non-compliance (RNC) and significant non-compliance (SNC). For RNC/SNC, the criteria met for each designation will be delineated, and a description of the enforcement history, present actions, and dates that non-compliance was resolved or is expected to be resolved will be provided. The QR shall also identify each State-controlled SIU, as may occur, delineating the name, address, and receiving POTW; the SIU categorical status; the SIU notification date; and the ICIS NPDES reporting number. The QR will include State-SIU inspections and samplings completed during the quarter, and evaluate SNC pursuant to 40 CFR §403.10(f)(2)(ii) and §403.8(f)(2)(viii). For SIUs in SNC, the criteria met for each designation will be delineated, and a sufficient description of the enforcement history, present actions, and date4s that the SNC was resolved or is expected to be resolved will be provided.<br><br>Any SIUs discharging to POTWs without active approved programs shall be evaluated for SNC, reported to EPA as either "developing programs" or new State permitted SIUs, and published, pursuant to 40 CFR 403.10(f)(2)(i).<br><br>The first QR of the year, due by February 28th, shall also include a detailed listing of the active approved POTW pretreatment programs and developing programs including: Town name, POTW name(s) and associated NPDES permit number(s). For programs with multiple POTWs, the listing will also identify the key permit number for the program which is used for coding activities in ICIS-NPDES. Information for developing programs shall also include the SIU names, addresses, categorizations (if applicable); and if discharging, the SIU permit numbers used in ICIS-NPDES, the SIU permit expiration dates, and the average daily process flows (gpd). | 40 C.F.R. § 403<br>Goal 2.2 and Goal 5 of the Strategic Plan | Quarterly | Q1 : February 28th<br>Q2: May 31st<br>Q3: August 31st<br>Q4: November 30th | Submit to EPA R4's Pretreatment Coordinator electronically | | | |
| 106 | Enforcement | 9.b. | Industrial Pretreatment Program Oversite Schedule | Oversight Schedule for FY19<br>In fourth quarter, submit a schedule electronically to the EPA PTC of the POTW pretreatment program PCI and Audits to be conducted in the next inspection year (FY19). If subsequent changes to the schedule occur, then they shall also be submitted electronically to the EPA PTC with line-item explanations.<br><br>This schedule (for FY19) shall reflect that 20% or more of active approved POTW programs shall receive an Audit by the end of FY19, so that all such programs are audited within each 5 year permit term. During each audit, assessment of the POTW's inspection procedures will be made by an oversight inspection of at least two industrial users discharging to the POTW, unless the POTW has less than two industrial users.<br><br>This schedule shall also reflect that at least 80% or more of active approved POTW programs shall receive a PCI by the end of FY19, so that each program receives at least four PCIs within 5 years. | 106 | Enforcement | Q4: November 30th | Submit to EPA R4's Pretreatment Coordinator electronically | | | |
| 106 | Enforcement | 8.a.<br>9.a.<br>9.c.<br>9.d.<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17 | ICIS-NPDES Reporting | Enter and maintain the following data into ICIS-NPDES:<br>● CAFO facilities with NPDES permits and the date of the most recent inspection<br>● PCIs and audits of active approved POTW pretreatment programs, including associated data such as number of SIUs and POTW compliance with Enforcement Response Plans;<br>● POTW pretreatment program performance reports per 40 CFR 403.12(i) shall be tracked, and 100% of submissions will be reviewed to determine if appropriate permitting and enforcement of SIUs is being accomplished by POTWs by the end of the FY19;<br>● oversight activity related to SIUs actively discharging, or pursuing discharge, to POTWs without active approved programs by the of FY19;<br>● all RIDE (or WENDB) data elements entered within 15 days after the fact, except as specified elsewhere;<br>● current effluent limits and monitoring requirements for all major dischargers within 30 days after the effective date of the permit;<br>● each month, maintain at least 95% data entry rate for DMR parameters for facilities currently tracked under WENDB requirements entered within 58 days after the end of each monitoring period;<br>● all inspection data for NPDES program areas entered within 30 days of completion of the inspection report, but no later than 45 days from the date of the inspection, and all other information (single event violations) must be entered within 90 days of inspection so that all information for the current FY is entered by no later than December 31st;<br>● all Single Event Violations, except those automatically identified by the system (e.g., if DMR data entered, effluent violations need not be identified as SEV) entered within 90 days of discovery of violation.;<br>● all formal and informal enforcement actions entered within 30 days of issuance of the enforcement action;<br>● penalties assessed and collected entered within 30 days of date of collection;<br>● NPDES permit and enforcement schedule data within 30 days of issuance; and<br>● completion of schedule milestones entered within 30 days of notification of completion. | 40 C.F.R.<br>§ 122.23<br>National Enforcement Initiatives<br>40 C.F.R. § 123.26<br>§ 403<br>Goal 5 of the Strategic Plan<br>National Policy | Ongoing | As noted in the description for each item | Upload or manually enter into ICIS-NPDES | | Recommend task modification to<br>reflect updated Agency regulations and/or National Water Program Guidance<br>priorities:<br>ICIS-NPDES Data<br>Entry.<br>State agrees to comply<br>with Phase 1 of the NPDES Electronic Reporting Rule [40 CFR Parts 9, 122,<br>123, 124, 127, 403, 501, and 503]. As data elements are available in<br>ICIS-NPDES, enter and maintain minimum data elements as defined in appendix A<br>to 40 CFR Part 127, including (but not limited to):<br>.<br>Basic permit, facility, permit<br>schedules, and narrative conditions for all NPDES permits;<br>.<br>Permitted features, limit sets, and<br>limits for all dischargers;<br>.<br>Discharge Monitoring Reports (DMRs) for all<br>dischargers (major and minor);<br>.<br>Compliance monitoring activities and<br>violation determinations;<br>.<br>Formal and informal enforcement actions,<br>enforcement schedules, enforcement limits;<br>.<br>Penalties assessed and collected;<br>.<br>NPDES permit and enforcement schedule<br>data; and<br>Single Event<br>Violations, except those automatically identified by the system (e.g. if DMR<br>entered, effluent violations need not be identified as SEV) Change accepted | |
| 106 | Enforcement | 18 | Enforcement Management Strategy | Submit an updated EMS to EPA if any revisions are made to the EMS. | Regional Priority<br>40 C.F.R. § 123.26 | As needed | 60 days after finalizing revisions | Email to EPA R4's Tara Houda | | | |
| 106 | Enforcement | 2 | NEW TASK | Region 4 will generate and review the Quarterly Noncompliance Report (QNCR) (major and minor facilities) and discuss any concerns with the State. This will provide the State an opportunity to correct any data discrepancies in ICIS before public dissemination of the report. Use of the QNCR will continue until such time that it is supplanted by the NPDES Non-Compliance Report (NNCR). | Added to include NPDES SNC NCI requirements, specifically inclusion of minor permits. | Quarterly | Schedule:<br>12/15/19*; 3/17/20*; 6/16/20*; 9/15/20*<br><br>*Due dates are estimated and may vary depending on the generation and state notification date. | Email to EPA R4's Mary Mattox and Tara Houda | | Change accepted<br><br>FDEP 05/04/20 Comment - the task number, explanation for the " * ", frequency, and EPA contact were missing and have been added as copied from row 10 above. | |
| 106 | Enforcement | 3 | NEW TASK | On a quarterly basis, Region 4 will provide the<br>SNC list for major sources and a high priority SNC list for minor source<br>permits to the State for comments and discussion. The State agrees to provide<br>a written explanation for all major facilities within 15 days of receipt. For<br>the minor sources, the State agrees to provide written explanation for<br>facilities listed in the high priority SNC list, which will be a subset of<br>all minor, individual permit facilities in SNC, within 15-30 days of receipt.<br>For major facilities, within 30 days of being notified by EPA of<br>noncompliance or SNC list generation, the State agrees to execute a formal<br>enforcement action, refer the facility to EPA for enforcement, or provide a<br>written explanation of either why no formal action is appropriate, or the<br>type of formal action being taken, with a projected date of action. For the<br>minor facilities, the state agrees to work with EPA to address the<br>noncompliance issues in accordance with the SNC National Compliance<br>Initiative (NCI) to reduce the SNC noncompliance rate. The State shall submit<br>copies of draft and final enforcement actions, as requested. | Added in accordance with NPDES SNC NCI implementation strategy | Quarterly | Schedule:<br>1/4/20*; 3/30/20*; 6/29/20*; 9/28/20*<br><br>*Due dates are estimated and may vary depending on the generation and state notification date. | Email to EPA R4's Tara Houda | | Change accepted<br><br>FDEP 05/04/20 Comment - the task number, explanation for the " * ", frequency, and EPA contact were missing and have been added as copied from row 11 above. | |
| 106 | Enforcement | | NEW TASK | ~~5 a. CORE PROGRAM AFO/CAFO Facilities The State agrees to notify Region 4 of any discovered unauthorized, or alleged unauthorized discharge to waters from any animal feeding operation regardless of whether such operation maintains a state issued NPDES permit to discharge to waters. The State agrees to submit reports of these findings no later than November 30 (for Jul - Sept); February 28 (for Oct - Dec); May 31 (for Jan – Mar); and August 31(for Apr – Jun) of each year.~~ 5 b. CORE PROGRAM – Stormwater The stormwater program will continue to use the Address Comparison Tool to help states identify an accurate universe of facilities that require an industrial stormwater permit and to look for corporate noncompliance across state lines. The region plans on making this tool available to all states, ideally by the end of FY19. Because of the significant environmental impacts that can be obtained thorough permit compliance, EPA's stormwater program will work with each state to strategically inspect MS4s, both Phase I and Phase II. 5 c. CORE PROGRAMS - Resource Extraction For fiscal years 2020-2021, EPA Region 4 has identified the resource extraction industry as having the potential to significantly contribute industrial pollutants to the nation's waters and has defined the industry to include coal mining, mineral mining, and metal mining. This includes a universe of approximately 5,000 facilities. Region 4 intends to work collaboratively with the State NPDES program throughout the targeting and inspection process. EPA is asking the states to provide assistance in understanding the multiple agencies involved in regulating the resource extraction industry. EPA will make additional efforts to coordinate and communicate with states where comprehensive environmental solutions require simultaneous compliance under the Clean Water Act from both authorized and nonauthorized programs. | | | | | | For the last several years, FDEP has been providing the documentation to meet this item. EPA's expectation for this year is that FDEP continues to provide exactly what they have provided for the last several years and EPA would like to clarify that we are not requesting a new product.<br><br>FDEP 05/04/20 Comment regarding Task 5a - If EPA is not requesting a new product, then why is Task 5a labeled as a "new task"? If FDEP is to continue to supply the same information that we have for the last several years as outlined in Task 8c above, then this item is duplicative and should be removed. | |

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| Grant | Program | FFY 2020 Task No. | Report Title | Report Type/Description | Basis for Reporting Requirement | Submittal Frequency | Deadlines | Where/How to Submit | Florida DEP August 2019 Proposed Changes | EPA Comments | 2020 Mid-Year report "Status Update" |
|---|---|---|---|---|---|---|---|---|---|---|---|
| ALL | ALL | | PPG Financial Status Report | Submit the final Financial Status Report (FSR) for all grants covered under the PPG. | 40 CFR §30.52 | Annually | December 31st | | | | |
| 106 | DEAR-GRDWTR | 1 | Integrated Water Quality Assessment Report | Integrated Reports and updates consistent with EPA's guidance for Assessment, Listing, and Reporting Requirements pursuant to Sections 303(d), 305(b), 314 of the Clean Water Act. Mechanism for monitoring improved water quality. | Water Pollution Control Act Grant Requirement | Biennially | April 1st, 2020 | Submit to EPA R4's Water Protection Division Director, Mary Walker | | | |
| ~~106~~ | ~~DEAR-Watershed~~ | ~~1~~ | ~~Watershed-Protection-Reporting~~ | ~~Report on activities and efforts to develop and implement BMAPs.~~ | ~~EPA Strategic Plan: Protect Human Health (Objective 2.1) and Water Quality (2.2). Improve Water Quality on a Watershed-Basis (2.2.1 – Measures SP-10, 11, 12)~~ | ~~Annually~~ | ~~December 31st~~ | ~~Submit to the requestor~~ | | Based on the modification to The EPA National Water Program Guidance, the Watershed tasks are no longer an Agency priority. Change accepted. | |
| 106 | TMDL-303d | 2 | TMDL Priority Ranking | The state will provide to EPA on even years concurrent with submittal of the 303(d) list a prioritization for developing TMDL for all waterbodies (and causes of impairment) on that Section 303(d) list. The prioritization should be consistent with State's long-term prioritization and EPA's guidance in the 2016 IRG Memo. | Section 303(d)(1)(A)<br>EPA Long-Term Vision Section 303(d)(1)(A)<br>EPA Long-Term Vision | Biennially, concurrent with submittal of the 303(d) list | submittal of the 303(d) list | Submit to EPA R4's TMDL Contact | | Recommend task<br>language modification to reflect updated Agency regulations and/or National<br>Water Program Guidance priorities:<br><br>Comprehensive TMDL Development Prioritization: The<br>State agrees to provide to EPA, on even years concurrent with submittal of the<br>303(d) list, a prioritization for developing TMDLs for all waterbodies (and<br>causes of impairment) on the Section 303(d) list. This prioritization should be<br>consistent with the state's long-term prioritization and EPA's guidance in the<br>IRG Memo.<br><br>Basis for Task: Statutory Requirement Section 303(d)(1)(A) and<br>EPA Long-Term Vision<br><br>Outputs: TMDL Development Ranking for all<br>current 303(d)-Listed Waters (Region 4 and the State should agree on the<br>appropriateness of these rankings.)<br><br>4/1 even years<br>Change accepted | |
| 106 | TMDL-303d | 3 | TMDL Development Schedule | The State will provide to EPA a TMDL Development Schedule for development of TMDLs and alternative restoration approaches, FY 19 and FY 20, identifying the specific waterbodies and pollutants of concern when identified and planned for TMDL development and the estimated date for submitting the TMDLs to EPA for approval. The State will provide EPA with an updated development schedule when significant changes occur.<br>EPA recognizes that State TMDL Programs are transitioning as consideration is given to how to achieve the new CWA 303(d) Vision and the associated goals and metric. EPA also recognizes that some flexibility will be needed in this schedule. | EPA Strategic Plan<br>Program Activity Measure<br>WQ-27<br>EPA Long-Term Vision | Annually | Draft FY 19 & FY 20 development schedule - October. The output (deliverable for this task is a development schedule, not measurement commitment) | Submit to EPA R4's TMDL Contact | | Recommend task language modification<br>to reflect updated Agency regulations and/or National Water Program Guidance<br>priorities:<br><br>Final TMDL and<br>Alternative Restoration Approach Submittals<br>The State agrees to<br>submit to EPA final TMDLs, which include: (1) a responsiveness summary; (2)<br>copies of all comment letters received (if requested by EPA); (3) technical<br>support information such as the applicable water quality standard, source<br>assessment, data analysis, water quality monitoring and modeling assumptions,<br>and calculation methods; and (4) as appropriate, the loading capacity<br>analysis (model), supporting input data, and a modeling report. In addition,<br>the state is encouraged to transmit all relevant geospatial data and<br>information for the TMDL to EPA.<br><br>Based on the Long-Term CWA 303(d)<br>Vision, a State has the option to develop an alternative restoration<br>approach comprised of pollution controls that, when implemented, will lead to<br>attainment of water quality standards. The State will provide to EPA the<br>required information to support these alternatives for the 303(d) List.<br><br>For guidance on<br>requirements for Category 5-alt or 4B listing, the State should refer to the<br>following EPA documents, respectively: (1) Integrated Report Memo Section on the CWA Vision Implementation,<br>(2) Voluntary Integrated Reporting Subcategory for Waterbodies with<br>Implementable Water Quality Restoration Activities and (3) Recommended | |
| 106 | TMDL-303d | 7 | TMDL Annual Evaluation | The State will assist EPA to conduct Annual Evaluations of progress in implementing work plan commitments by providing status reports for each task under 303(d) TMDL Program. | Program Priority<br>40 CFR 31.40 (b)<br>40 CFR 35.115 (a)<br>2.2.1 | Annually | December 31st | Submit to EPA R4's TMDL Contact | | | |
| 106 | TMDL-303d | | | NEW TASK:<br><br>For FY20 and the FY21<br>Development Schedule: The State agrees to provide EPA a list of all TMDLs and alternative restoration approaches, planned for the fiscal years 2020 and 2021, identifying the specific waterbody/impairments combinations. The state agrees to indicate which TMDLs and/or<br>alternative restoration approaches will address priority waters under the CWA Vision (i.e., WQ-27 universe).<br><br>The<br>State agrees to provide EPA with an<br>updated development schedule should significant changes occur. | 40 CFR §140.7(b)(4), EPA Strategic Plan Program Activity Measures (PAM) WQ-27 and WQ-28, EPA CWA Long-Term Vision | Output: Final Development Schedule for TMDLs and Alternative Restoration Approaches for the current two-year planning cycle.<br><br>Final Schedule for the current two-year planning cycle | 1-Oct | | | Change accepted per call 2/26/2020 | |
| 106 | TMDL-303d | | | NEW TASK: TMDL ProgressReport: TheState agrees to participate in regular conference calls with the Region andprovide a progress report on all TMDLs and alternative restoration approachesscheduled for development in the current fiscal year. This report will includeany revisions to the current fiscal year Development Schedule dates (Seeearlier Task above) and cause for revision. | Program Priority | | TMDL Progress Report<br>4/1 (written)<br>7/1 (written or verbal) | | | Change accepted | |
| 106 | TMDL-303d | | | NEW TASK: IntegratedReporting - §303(d), §305(b), Assessment Database CompatibleSpreadsheet, and Geo-referencing: TheState agrees to submit its biennial 303(d) List and enter data into ATTAINS. The state agrees to submit the Listin the even calendar years. | | | 303(d) list - 4/1 on even years | | | Change accepted | |
| 106 | WQSP | 2 | Water Quality Standards Rule Packages | Submit timely and complete water quality standards packages to EPA for review and approval. The submittal should include the minimum requirements contained in 40 CFR 131.6 and the record of public participation, as required by 40 CFR 131.20 and 40 CFR 25.<br>Outputs: Submission of timely and complete state water quality standard revisions that EPA can act upon within the CWA statutory deadline. | 40 CFR 131.6<br>40 CFR 131.20<br>40 CFR 25<br>WQ-3a<br>WQ-4a | Dependent on the State rulemaking process. | Consistent with the time frame for submittal required under 40 CFR 131.20. | Submit to EPA Region 4's Regional Administrator | | | |
| 106 | WQSP | 6 | WQSP | Submit a written status report of all WQS activities in the State, which will provide end-of-year comments on the following commitments: 1) Any Site-Specific Alternative Criteria; 2)<br>Status of Human Health-Based Criteria; and 3)<br>Any rulemaking to change the classification system or revise designated uses of specific waters. | Program Priority<br>40 CFR | Annually | December 31st | Submit to EPA Region 4's Regional Administrator | | | |
| 106 | WQSP | | WQSP | New Task:<br><br>Reporting<br>– The state agrees to submit a written status report of all WQS activities in the State. | Program<br>Priority | Output: Qualitative report of State WQS activities. Annually 12/31 | | | | New task - EPA agrees to delete per call on 2/25/20 | |
| 106 | Assessment | Assessment 1/ Monitoring 6 | BMAP Progress Reports | Identify FDEP reports (e.g., BMAP Progress Reports) which provide results for the water restoration projects where post project monitoring has been initiated or completed. Submit monitoring data and information to a national database (e.g.,WQX). Submit assessment results with IR Report. | Program Priority<br>2.2.1<br>SP-10<br>SP-11 | As required | Annually after Adoption | Post final to http://www.dep.state.fl.us/water/watersheds/bmap.htm | | | |
| 106 | Assessment | 5 | Assessment Database Reporting | Data Management, Assessment Database (ADB): ADB or an equivalent database using required EPA data elements and ADB schema. Geo-referenced data files depicting the location of every AU in the ADB or equivalent database will be submitted in the form of point, line and/or polygon Geographic Information System (GIS) layers or NHD reach indexing tables. EPA has been and will continue to provide assistance in consolidating and updating FDEP's assessment data to input into the new ATTAINS system. Once the consolidation and the upload of the recently approved list into the ATTAINS system in complete, the state will be responsible to update their data in ATTAINS. | 2006 IR Guidance and Updates | Annually | April 1st | Upload to the Assessment Database | | | |
| 106 | Assessment | Assessment7/<br><br>Assessment 2/ Monitoring 7 | Integrated Water Quality Assessment Report | Reporting - § 305(b) or (ADB): Output: 2016 annual electronic update.<br><br>Third Party Data:<br>Report use of third party data to support and supplement water quality monitoring, assessments and related activities. EPA has been and will continue to provide assistance in consolidating and updating FDEP's assessment data to input into the new ATTAINS system. Once the consolidation and the upload of the recently approved list into the ATTAINS system in complete, the state will be responsible to update their data in ATTAINS. | Program Priority<br>2.2.1<br>CWA § 303(d) and 305(b)<br>IR Guidance<br>40 CFR 130.8(d)<br>SP-10<br>SP-11 | Biennially | April 1st | Submit to Florida Assessment Coordinator at EPA, Catherine York via email or CD/DVD | | Recommend task modification to<br>reflect updated Agency regulations and/or National Water Program Guidance<br>priorities:<br><br>Integrated Report (IR) and the Consolidated Assessment<br>and Listing Methodology (CALM): In even calendar years, the State<br>shall submit its biennial 305(b) report and Section 303(d) List as part of<br>the Integrated 305(b)/303(d) Report (IR). The state will also provide updates<br>to and refine the comprehensive, scientifically valid assessment and listing<br>methodology documentation to support the state's determination to list or not<br>list waters [40 CFR 130.7 (b)(6) (i- iv)]. The documentation should include:<br>1) explain how the<br>State identifies and considers all existing and readily available data and<br>information;<br>2) articulate the<br>basis of the quality assurance and quality control criteria used to evaluate<br>data submitted by outside entities; and<br>3) explain the<br>analytical approaches, including statistical analyses, used to infer true<br>segment conditions from all valid existing and readily available information.<br><br>The State will<br>document updates to the CALM used to develop their IR. As recommended in EPA IR guidance, the<br>CALM should document the listing/delisting decision process and should be<br>consistent with applicable water quality standards and with sound science and<br>statistics. Prior to submission of its IR, the decision process the State describes in the | |
| 106 | Assessment | 6 | Data Analysis and Assessment Methods | The State will document updates to, and refine, its comprehensive, scientifically valid assessment methods for data and/or waterbody type, including use of State and third party data, considering trends, and incorporating the full range of available data. Output: The State's current Listing and Assessment Methodology | Program Priority & Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | Annually | October 1st | Submit to Florida Assessment Coordinator at EPA, Catherine York, with 303(d) submission | | | |
| 106 | Assessment | 9 | Assessment Program's 106 Annual Summary Report | Submit the Assessment Program's 106 Annual Summary Report to include end-of-year comments on the following commitments:<br>1) BMAP & Restoration Effectiveness<br>2) Third Party Data<br>3) Public Water Supply Monitoring and Data Use 4)<br>Data Management, Assessment Database (ADB) 5)<br>Data Analysis and Assessment Methods 6)<br>Reporting - 305(b) or (ADB) 7)<br>State's Evaluation | Program Priority<br>Regulatory Requirement<br>40 CFR | Annually | December 31st | Submit to Florida Assessment and 106 Coordinators at EPA, Catherine York and Jennifer Shadle via email | | | |
| 106 | Monitoring | 1 | State Monitoring Strategy | The State will annually review and maintain a comprehensive monitoring strategy containing all of the information as outlined in Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003). Strategy revisions such as refined objectives, designs, evaluation processes, general support and infrastructure needs, and other elements will be provided to EPA for review. | Program Priority & Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003); 40 CFR 130 | As needed | Upon changes made to Monitoring Program approaches | Submit to State Monitoring Coordinator at EPA, Chris McArthur | | | |
| 106 | Monitoring | 12 | WQX/STORET Reporting | The State is required to submit geo-referenced water quality data, such as: ambient water chemistry, biology, habitat, fish tissue, toxicity and sediment chemistry data. Data must include all sampling results for current cycle monitoring activities used to support the assessment information submitted for the fiscal year, which may include: Accepted, Validated, Preliminary, and Final monitoring results. (Note: Only monitoring results marked as "Final" in State WQX transmittal are made available to the public in STORET). Electronic updates will be submitted throughout the year to WQX/STORET utilizing EPA's established electronic data schema and data elements for submission. The State agrees to geo-reference their monitoring data to include station locations. EPA may determine that an alternate data submission satisfies the statutory annual requirement, which the State and EPA will identify and discuss before Section 106 funds are awarded. | Program Priority & Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | Annually | April 1st | WQX transmission to STORET data warehouse | | | |
| 106 | Monitoring | ? | Quality Assurance Project Plan | The State shall maintain an up-to-date Quality Assurance Project Plan (QAPP), which documents the results of a project's technical planning process, providing in one place a clear, concise, and complete plan for the environmental data operation and its quality objectives and identifying key project personnel. The State shall review, update, and submit the QAPP for approval at least once every 5 years, along with a log of proposed revisions identified as "major" or "minor". The State shall submit the QAPP for EPA approval prior to implementing any major changes to the monitoring program. | 2 CFR 1500.11; 40 CFR 35 | At least once every 5 years or when significant revisions are made | Significant changes must be approved by EPA prior to State's implementation of those changes | Project Officer (Jennifer Shadle) | | | |
| 106 | Monitoring | 3<br>4<br>5<br>14 | Annual Monitoring Progress Report | Submit the Monitoring Program's End-of-Year Comments to include:<br>● any specific monitoring program improvement(s), including those funded with supplemental monitoring initiative funds;<br>● any updates or revisions to Probability Network Design documents, and findings of Enhanced Network Designs; and<br>● confirm continued use of existing indicator capabilities and describe any revised or new, enhanced Indicator Capabilities. | Program Priority<br>Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003)<br>Program Priority<br>Regulatory Requirement<br>40 CFR 31.40 (b)<br>40 CFR 35.115 (a)<br>2.2.1; 40 CFR 130.4 | Annually | December 31st | Submit to State Monitoring Coordinator at EPA, Chris McArthur | | | |
| 106 | Monitoring | | | NEW TASK: Monitoring Design: The State agrees to enhance the networkdesigns for making statistically valid inferences about the condition of allstate water types, subject to availability of resources/funding. | Program<br>Priority and Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | | Output: Describe the design and rationale for monitoring networks (e.g. fixed stations, rotating basins, probabilistic design) Due 12/31 | Submit to State Monitoring Coordinator at EPA, Chris McArthur | | | |
| 106 | Monitoring | | | NEW TASK: Indicators: The State agrees to continuing development of monitoring indicator capabilities, subject to availability ofresources/funding. | Basis for Task: ProgramPriority and Elements of a State Water Monitoring and Assessment Program(EPA 841-B-03-003) | | Output: Describe plans for enhancing use of indicators (e.g., new waterbody types, new parameters, other biological assemblages) Due 12/31 | Submit to State Monitoring Coordinator at EPA, Chris McArthur | | | |
| 106 | Monitoring | | | NEW TASK: Data Management, Water Quality Exchange(WQX: The State agrees to submitgeo-referenced water quality monitoring data (e.g., water chemistry, biology, physicalparameters, fish tissue, habitat, toxicity, sediment chemistry, etc.) forelectronic submission on or before April 1st of each year. Annual electronic updates will be submittedusing WQX using EPA's established data formats and data elements for submission. | Basis for Task: Program<br>Priority and Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | | Output: Transmission of all State water quality monitoring data for current and previous Fiscal Years by April 1st annually. | Submit to State Monitoring Coordinator at EPA, Chris McArthur | | DEP: Will this replace Task 12? This is duplicative. | |
| 106 | Monitoring | | | NEW TASK: Program Evaluation: The State agrees to evaluate its monitoringprogram through processes/activities such as staff input, peer review, etc. anddocument how well the state's monitoring designs and systems meet its objectivesand decision needs. | Basis for Task: Program<br>Priority and Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | | Output: Provide a state self-assessment of monitoring program. Due 12/31 | Submit to State Monitoring Coordinator at EPA, Chris McArthur | | | |
| 106 | Monitoring | | | NEW TASK: Strategy Implementation: TheState agrees to planning for and implementing specific monitoring programimprovements, identified in the approved monitoring strategy, subject toavailability of resources/funding. | Program<br>Priority and Elements of a State Water Monitoring and Assessment Program (EPA 841-B-03-003) | | Description of specific monitoring program improvement(s). Identify future resource needs to fully implement monitoring program strategy. Due 12/ | Submit to State Monitoring Coordinator at EPA, Chris McArthur | | | |

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| INSPECTION LOS - FFY 2020 | DARM | | | RCRA | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Activity Type**<br>COLOR KEY:<br>Gold shading=required | **Air - Title V (FCE)** | **Air - Synthetic Non-Title V (FCE)** | **Air - Asbestos** | **HW - LQG** | **HW - SQGs** | **HW - CESQG** | **HW - Operating TSDs** | **HW - Remaining TSDs** | **HW - CME & O/M** | **HW - Remaining Land Disposal** | **HW - Federal TSDs** | **HW - State/Local TSDs** | **HW - Used Oil Processors** | **HW - Formal Enforcement** | **HW - Transporter/Transfer Facilities** |
| **Level of Service** | Each Facility Inspected Every 2 Years (~50% of Facilities/Year) | Each Facility Inspected Every 5 Years (~20% of Facilities/Year) | 100% of Complaints | 20% of Facilities (district # per RCRA workplan) | 3% of Facilities | 1% of Facilities | 50% of Operating Facilities | 50% of Remaining Facilities | Visit each facility once every three years | 50% of Remaining Facilities | 100% Annually | 100% Annually | 50% of Facilities (each facility every 2 years) | 33% of Formal Enforcement Facilities | 25% of Facilities (each facility every 4 years) |
| **Central District - site visits** | 24 | 1 | 0 | 19 | 24 | 30 | 2 | 0 | 3 | 2 | 3 | 1 | 3 | 2 | 7 |
| **total facilities for CD** | 43 | 42 | 0 | 94 | 796 | 2,983 | 4 | 0 | 3 | 3 | 3 | 1 | 5 | 7 | 27 |
| **Northeast District - site visits** | 37 | H | 3 | 15 | 12 | 21 | 1 | 0 | 4 | 2 | 2 | 4 | 2 | 2 | 8 |
| **total facilities for NED** | 70 | 28 | 3 | 73 | 395 | 2,143 | 3 | 0 | 4 | 5 | 2 | 4 | 4 | 6 | 32 |
| **Northwest District - site visits** | 18 | 3 | 7 | 5 | 4 | 16 | 1 | 0 | 3 | 2 | 2 | 0 | 1 | 1 | 4 |
| **total facilities for NWD** | 41 | 24 | 7 | 26 | 118 | 1,648 | 3 | 0 | 3 | 3 | 2 | 0 | 2 | 4 | 16 |
| **South District - site visits** | 11 | 3 | 0 | 4 | 10 | 22 | 0 | 0 | 1 | 1 | 1 | 0 | 0 | 1 | 4 |
| **total facilities for SD** | 21 | 11 | 0 | 22 | 339 | 2,232 | 0 | 0 | 1 | 1 | 1 | 0 | 0 | 2 | 15 |
| **Southeast District - site visits** | 13 | 3 | 0 | 20 | 32 | 48 | 2 | 0 | 2 | 1 | 0 | 0 | 4 | 2 | 14 |
| **total facilities for SED** | 23 | 13 | 0 | 102 | 1,065 | 4,859 | 3 | 0 | 2 | 2 | 0 | 0 | 9 | 6 | 55 |
| **Southwest District - site visits** | 22 | 20 | 0 | 23 | 23 | 31 | 2 | 1 | 2 | 3 | 0 | 0 | 4 | 5 | 6 |
| **total facilities for SWD** | 56 | 80 | 0 | 114 | 775 | 3,124 | 3 | 2 | 2 | 5 | 0 | 0 | 8 | 14 | 24 |
| **Tallahassee - site visits** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **total facilities for Tally** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Tallahassee Audits** | 12 | 12 | 0 | | | | | | | | | | | | |
| **Total Inspections** | **125** | **30** | **10** | **86** | **105** | **168** | **8** | **1** | **15** | **11** | **8** | **5** | **14** | **13** | **43** |
| **Total Number of Facilities** | **254** | **198** | **10** | **431** | **3,488** | **16,989** | **16** | **2** | **15** | **19** | **8** | **5** | **28** | **39** | **169** |
| **State or Federal** | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal |
| **Source of Inspection Requirement (i.e. MOA, 40 CFR 123, CWA 106 Workplan, etc)** | EPA Clean Air Act Stationary Source Compliance Monitoring Strategy, EPA State Review Framework | EPA Clean Air Act Stationary Source Compliance Monitoring Strategy, EPA State Review Framework | 7/15/14 PPA page 22, paragraph 3 | 40 CFR 271.15 and State Review Framework | 40 CFR 271.15 | 40 CFR 271.15 | RCRA § 3007(e) and State Review Framework | RCRA § 3007(e) and State Review Framework | 40 CFR 271.15 | RCRA § 3007(e) and State Review Framework | RCRA § 3007(c) and State Review Framework | RCRA § 3007(d) and State Review Framework | 40 CFR 271.15 | 40 CFR 271.15 | 40 CFR 271.15 |

| INSPECTION LOS - FFY 2020 | NPDES STORMWATER | | | | | | POTABLE WATER | | | WASTEWATER | | | | | | | | | | UIC | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Activity Type**<br>COLOR KEY:<br>Gold shading=required | **NPDES ST-Large CGP** | **NPDES ST - Small CGP** | **NPDES ST-MSGP** | **NPDES ST-NEX (no exposure)** | **MS4 Audit Phase I** | **MS4 Audit Phase II** | **PW - CWS Sanitary Survey** | **PW - NTNC Sanitary Survey** | **PW - TNC Sanitary Survey** | **WW - NPDES DW Major** | **WW - NPDES DW Minor** | **WW - NPDES DW SSO Major** | **WW - NPDES DW SSO Minor** | **WW- NPDES IW Major** | **WW- NPDES IW Minor** | **WW - NPDES Generic** | **WW - NPDES CAFOs** | **WW - NPDES Industrial Pretreatment Compliance Inspections** | **WW-NPDES Industrial Pretreatment Program Audits** | **UIC - Class I** | **UIC - Class I Mechanical Integrity Test** | **Major Class V** |
| **Level of Service** | 10% of active regulated construction sites | 10% of active regulated construction sites | 10% of universe / year | 10% of universe / year | 20% of universe annually | 14% of universe annually | 33% of facilities (each facility every 3 years) | 20% of facilities (each facility every 5 years) | 20% of facilities (each facility every 5 years) | 50% of facilities (each facility every 2 years) | 20% of facilities (each facility every 5 years) | 33% of facilities (each facility every 3 years) | 20% of facilities (each facility every 5 years) | 50% of facilities (each facility every 2 years) | 20% of facilities (each facility every 5 years) | 20% of facilities (each facility every 5 years) | 20% of Facilities (each facility every 5 years) | 80% of approved active programs every five years (i.e. at least four PCIs per program during each five years). | 20% of approved active programs (each program every 5 years) | 50% of facilities (each facility every 2 years) | 50% of facilities scheduled for testing (each facility every 2 years) | N/A |
| **Central District - site visits** | 38 | 35 | 45 | 18 | 0 | 0 | 147 | 31 | 127 | 6 | 3 | 4 | 3 | 2 | 2 | 17 | 0 | 0 | 0 | 5 | 3 | 11 |
| **total facilities for CD** | 623 | 539 | 527 | 181 | 22 | 55 | 441 | 156 | 634 | 12 | 14 | N/A | N/A | 4 | 13 | 84 | 0 | 21 | 21 | 10 | 6 | 14 |
| **Northeast District - site visits** | 38 | 35 | 45 | 18 | 0 | 0 | 68 | 24 | 104 | 13 | 7 | 9 | 7 | 8 | 4 | 12 | 2 | 0 | 0 | 0 | 0 | 1 |
| **total facilities for NED** | 328 | 247 | 478 | 199 | 5 | 19 | 203 | 122 | 518 | 26 | 34 | N/A | N/A | 16 | 19 | 58 | 11 | 7 | 7 | 0 | 0 | 6 |
| **Northwest District - site visits** | 38 | 35 | 45 | 18 | 0 | 0 | 57 | 10 | 31 | 7 | 2 | 5 | 2 | 5 | 2 | 11 | 0 | 0 | 0 | 6 | 2 | 0 |
| **total facilities for NWD** | 182 | 220 | 249 | 62 | 7 | 26 | 171 | 48 | 157 | 14 | 9 | N/A | N/A | 10 | 9 | 53 | 3 | 5 | 5 | 11 | 3 | 7 |
| **South District - site visits** | 38 | 35 | 45 | 18 | 0 | 0 | 25 | 9 | 26 | 4 | 2 | 3 | 0 | 1 | 0 | 11 | 0 | 0 | 0 | 19 | 5 | 27 |
| **total facilities for SD** | 231 | 210 | 283 | 243 | 28 | 18 | 75 | 45 | 131 | 9 | 3 | N/A | N/A | 2 | 9 | 54 | 2 | 3 | 3 | 54 | 10 | 55 |
| **Southeast District - site visits** | 38 | 35 | 45 | 18 | 0 | 0 | 29 | 4 | 22 | 6 | 1 | 4 | 1 | 3 | 9 | 18 | 4 | 0 | 0 | 81 | 9 | 15 |
| **total facilities for SED** | 349 | 498 | 454 | 160 | 106 | 17 | 86 | 22 | 111 | 12 | 6 | N/A | N/A | 7 | 45 | 92 | 21 | 16 | 16 | 123 | 18 | 22 |
| **Southwest District - site visits** | 38 | 35 | 45 | 18 | 0 | 0 | 60 | 21 | 66 | 9 | 2 | 6 | 2 | 8 | 6 | 19 | 1 | 0 | 0 | 11 | 1 | 11 |
| **total facilities for SWD** | 510 | 375 | 655 | 211 | 61 | 13 | 180 | 104 | 331 | 19 | 9 | N/A | N/A | 15 | 33 | 95 | 7 | 15 | 15 | 21 | 2 | 70 |
| **Tallahassee - site visits** | 0 | 0 | 0 | 0 | 46 | 21 | 0 | 0 | 0 | N/A | N/A | 0 | 0 | 13 | 0 | N/A | N/A | 53 | 14 | 0 | 0 | 0 |
| **total facilities for Tally** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | N/A | N/A | N/A | N/A | 26 | 5 | N/A | N/A | 0 | 0 | 0 | 0 | 0 |
| **Tallahassee Audits** | | | | | | | | | | | | | | | | | | | | | | |
| **Total Inspections** | **228** | **210** | **270** | **108** | **46** | **21** | **386** | **99** | **376** | **45** | **17** | **31** | **15** | **40** | **23** | **88** | **7** | **53** | **14** | **122** | **20** | **65** |
| **Total Number of Facilities** | **2,223** | **2,089** | **2,646** | **1,056** | **229** | **148** | **1,156** | **497** | **1,882** | **92** | **75** | **0** | **0** | **80** | **133** | **436** | **44** | **67** | **67** | **219** | **39** | **174** |
| **State or Federal** | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal | Federal |
| **Source of Inspection Requirement (i.e. MOA, 40 CFR 123, CWA 106 Workplan, etc)** | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CFR 142.16(b)(3)(i) | CFR 142.16(b)(3)(i) | CFR 142.16(b)(3)(i) | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | CWA 106 Workplan | | | |

**For facility FCE inspections, the total number of facilities in each district was updated based on 10/2019 numbers. Actual inspection levels are determined by the Compliance Monitoring Strategy (CMS) submitted to EPA.**

**DARM does not include approved Local Program data in the above table. Local Programs are responsible for an additional:**
**Title V: 98 facilities, 46 inspections**
**Syn. Non-Title V: 257 facilities, 78 inspections**
**Asbestos: 64 asbestos complaint inspections**

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**Table III-1: Work Plan Permitting LOS**

| Permitting Activities | FY-20 Commitments (Please furnish facility names) | Authorization Status (Y/N) | Requires Federal Permit Conditions (Joint Permit) (Y/N) | EPA Technical Support Requested (Y/N) |
|---|---|---|---|---|
| 1. 1. Part B application review and NOD or compliance action to notify applicant of deficiencies: | | | | |
| Post-Closure (PC100) | | | | |
| Storage/Treatment (OP100) | Cape Canaveral AFS | | | |
| | Safety-Kleen Systems, Inc - (Tallahassee -3-079-02) | | | |
| | Perma-Fix of Florida, Inc. | | | |
| | Eglin AFB | | | |
| | | | | |
| | Envirofocus Technologies, LLC | | | |
| Subpart X | Chemring Ordnance Inc. | | | |
| Incinerators/BIFs | | | | |
| Begin Alternate to PC Mechanism | | | | |
| HSWA Only | | | | |
| Enforceable Document | | | | |
| **2. 265 Closure Plan review and NOD or compliance action to notify applicant of deficiencies:** | | | | |
| - Land Disposal (CL320) | | | | |
| - Incinerators/BIF | | | | |
| - Storage/Treatment | | | | |
| - Equivalency Petitions | | | | |
| **3. Completeness Determinations: (Permit applications determined complete and technically adequate and ready to proceed with draft permit).** | | | | |
| Post-Closure (PC150) | | | | |
| Storage/Treatment (OP150) | NAS Key West | | | |
| | Cape Canaveral AFS | | | |
| | Safety-Kleen Systems, Inc - (Tallahassee -3-079-02) | | | |
| | Perma-Fix of Florida, Inc. | | | |
| | Eglin AFB | | | |
| | | | | |
| Subpart X | | | | |
| HSWA Only | | | | |
| Alternative to PC Mechanism | | | | |
| **4. Public Notices - Draft Permits (or alternate mechanisms)/Permit Denials/Closure Plans/Modifications** | | | | |
| - Post-Closure | | | | |
| - PC Plan; (CL340) | | | | |
| • Draft Permits: (PC160) | | | | |
| • Draft AOCs: | | | | |
| • Storage/Treatment Draft Permits: (OP160) | NAS Key West | | | |
| | Cape Canaveral AFS | | | |
| | Safety-Kleen Systems, Inc - (Tallahassee -3-079-02) | | | |
| | Perma-Fix of Florida, Inc. | | | |
| | Eglin AFB | | | |
| | | | | |
| • Subpart X | | | | |
| • Incinerators/BIFs | | | | |
| • HSWA Only | | | | |
| **5. Final Determinations - Permits Issued/ Permits Denied/Closure Plans Approved/Alternate Mechanisms:** | | | | |
| - Post-Closure | | | | |
| • PC Plan: (PC360) | | | | |
| • Permits: (PC200) | | | | |
| - Enforceable Documents in lieu of Permit | | | | |
| - Storage/Treatment (existing) Permits: (OP200) | NAS Key West | | | |
| | Cape Canaveral AFS | | | |
| | Safety-Kleen Systems, Inc - (Tallahassee -3-079-02) | | | |
| | Perma-Fix of Florida, Inc. | | | |
| - Closure Plans: (OP360) | | | | |
| - Incinerators/BIFs | | | | |
| - Subpart X | | | | |
| - HSWA Only | | | | |
| - New Facilities | | | | |
| **6. Modification – Approval/Denial – Permits and Closure Plans** | | | | |
| - Land Disposal | | | | |
| - Post-Closure (PC240/242) | | | | |
| - Storage/Treatment (OP240/242) | | | | |
| - Incinerators/BIFs | | | | |
| - Subpart X | | | | |
| - HSWA Only | | | | |
| **7. Closure Certifications** | | | | |
| - Land Disposal | | | | |
| (Interim CL370/380) | | | | |
| (Permitted PC370/380) | | | | |
| - Storage/Treatment (OP370/380) | | | | |
| - Subpart X | | | | |
| **8. Miscellaneous** | | | | |
| - Emergency Permits | | | | |
| - Temporary Authorizations | | | | |
| - Year Reviews | | | | |
| - Interim Measures (Work Plan) Approvals | | | | |

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**Table III-2: RCRA 2020 GPRA Permitting Commitments**

**Hazardous Waste Facilities: Units Issued Initial Permits, Issued Permit Renewals or having other Approved Controls in Place.**

| Combined FY 2022 GPRA Baseline =__# of fac.in Baseline | Commitments for: Initial Units (Permit or Other Approved Controls in Place per Unit); and permit Renewals (Permit or Other Approved Controls in Place all Units) | |
|---|---|---|
| | FY 2020 Commitment (Include Facility Names and ID Numbers) | Type of Permit/Control Operating (OP), Post Closure (PC), Corrective Action Only (CA) |
| Initial Control Units Baseline HW4 | | |
| Permit Renewals Baseline HW5 | | |

**Table IV-1: State Commitments (FY20) and Projections (FY21) for Achieving Key Corrective Action Facility Milestones by 2020**

| State 2020 Corrective Action Baseline: {*State Enters Value*} | | *RCRAInfo* Event Code | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | CA050 Assessments | CA075 NCAPS Rankings | CA725 Human Exposures Controlled | CA750 Groundwater Releases Controlled | CA550 Remedy Construction | CA800 Ready for Reuse[1] (Optional Reporting)[2] | CA900/CA999 Performance Standards Attained[3] |
| FY2020 | Commitment(s) | 0 | 0 | 1 | 1 | 1 | 2 | 0 |
| | Cumulative | 111/111 | 111/111 | 111/111 | 108/111 | 90/111 | 25/111 | 48/111 |
| | State % (i.e., Cumulative / Baseline) | **100%** | **100%** | **100%** | **97%** | **81%** | **23%** | **43%** |
| | See Section IV: FY 2020 National Program Guidance Measures from the Draft FY2020-2021 NPM Guidance for OLEM. The Measures are RSRAU for CA800, CA1 for CA725, CA2 for CA750, CA5RC for CA550, and CA6 for CA900/999. Note that these are National Targets. The Region 4 targets will be shared with the states once they have been negotiated. | | | | | | | |
| | | | | | | | | |
| FY2021 | Projection(s) | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| | Cumulative | 111/111 | 111/111 | 111/111 | 110/111 | 90/111 | 27/111 | 50/111 |
| | State's % | **100%** | **100%** | **100%** | **99%** | **81%** | **24%** | **45%** |

**Table IV-2: Facility Names and Quarterly Projections for State Commitments for Achieving Key Corrective Action Facility Milestones for FY2020**

| *RCRAInfo* Event Code | Facility Name(s) | EPA ID | Anticipated Quarter for Completion (Required for CA550 & CA800 (RAU)) |
|---|---|---|---|
| CA050 | | | |
| CA075 | | | |
| CA725 | Cook Lumber & Treating Inc | FLD032444093 | 4th Quarter |
| CA750 | Cook Lumber & Treating Inc | FLD032444093 | 4th Quarter |
| CA550 | | | |
| CA800 | Armstrong Wood Products | FLD099703613 | 4th Quarter |
| | Babcock Florida Company | FLD000016386 | 4th Quarter |
| CA900/999 | | | |

# FY20 FL PPA Regional Comments

## Appendix A

| Program | Task Number | Workplan Task | EPA Comment |
|---|---|---|---|
| CAA-105 | IAQ-5 | ~~Submit a SIP revision to address nonattainment requirements for the 2010 SO2 NAAQS for areas designated nonattainment in 2017. Submissions are due October 9, 2019.~~ | FDEP change to remove task accepted. |
| CAA-105 | IAQ-9 | Upon receipt of an NSR/PSD permit application for a major source, submit a copy to EPA. If your agency has a completeness determination process, notify EPA when each NSR/PSD permit application is deemed complete. Upon public notice of a draft NSR/PSD permit for a major new source or modification, submit a copy to EPA of any documents relevant to the preliminary determination and draft NSR/PSD permit. Upon issuance of a final major source permit, submit a copy to EPA of any documents relevant to the final determination and final permit. | FDEP change to add new task accepted. |
| CAA-105 | IAQ-13 | Maintain an approved quality management plan (QMP) for activities involving the collection and use of air quality environmental data. The QMP will be submitted at least ~~six months~~ 180 days prior to the expiration of the current QMP and address EPA Requirements for Quality Management Plans (EPA QA/R-2, http://www.epa.gov/quality/qs-docs/r2-final.pdf). For additional information and guidance see http://www.epa.gov/quality/qmps.html.<br>Six months prior to expiration of QMP and QAPPs, states submit an updated QMP or QAPP for review and approval. This time frame was discussed at the recent meeting with the state air directors. This time frame is intended to provide enough time for all documents to be reviewed and approved prior to expiration of the plans that are in place. | FDEP change accepted. |
| CAA-105 | IAQ-16 | Maintain up-to-date standard operating procedures (SOPs) for instrumentation and quality system processes (e.g., data handling and validation, document control, etc.) in support of criteria pollutant monitoring activities, and as appropriate any air toxics | FDEP change accepted. |

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| | | monitoring activities conducted by your agency. SOPs for newly acquired instrumentation should be developed within 180 days from the startup of the equipment. Please submit courtesy copies of all SOPs either electronically at R4AirQA@epa.gov or by mail to EPA Region 4, Laboratory Services and Applied Science Division, 980 College Station Road, Athens, Georgia 30605, attn: Quality Assurance Section Chief. | |
| CAA-105 | CCI-4 | Participate with EPA in an end of year evaluation of performance to be completed by ~~January 31st~~ March 1st. This evaluation will be based on an annual summary report submitted by the agency by December 31, and on progress reports received throughout the year. In accordance with 40 CFR 35.115 and the EPA Policy on Managing Unliquidated Obligations and Ensuring Progress under EPA Assistance Agreements, the joint evaluation process will include:<br>A. discussions of accomplishments as measured against work plan commitments;<br>B. discussions of the cumulative effectiveness of the work performed under all work plan components;<br>C. discussions of existing and potential problem areas;<br>D. suggestions for improvement, including, where feasible, schedules for making improvements; and<br>E. discussions of how effectively grant funds were managed and utilized, taking into account any accumulation of unliquidated obligations. | FDEP change accepted. |
| **Program** | **Task Number** | **Workplan Task** | **EPA Comment** |
| RCRA 3011 | Waste Application Enhancements | ~~Implement enhancements and infrastructure upgrades to the existing software application used by Florida's hazardous waste inspectors to record and document findings while in the field and conducting inspections.~~<br>~~Phase 1, Persistence Layer Upgrades: Update the field inspection application infrastructure to replace the existing system's persistence layer with an update persistence layer. This will allow for the application to communicate with databases without an issue.~~ | FDEP change to remove task accepted. |

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| Program | Task Number | Workplan Task | EPA Comment |
|---|---|---|---|
| CWA Section 106 (DWRM) | 3 | The State agrees to implement the permit related requirements of the NPDES Memorandum of Agreement (MOA) between the State and EPA Region 4 as detailed in Section II, III and IV and IX. In particular, all draft permit packages submitted to EPA for review shall contain the information specified in Section IV.B.2. of the MOA. For a current copy of the MOA, see: http://www.epa.gov/compliance/resources/policies/state/moa/<br><br>Complete permit review packages. | Recommended change: The State agrees to implement the permit related requirements of the NPDES Memorandum of Agreement (MOA) between the State and EPA Region 4. For a copy of current MOA, see: http://www.epa.gov/compliance/memorandum-agreements-between-epa-and-states-authorized-implement-national-pollutant<br>Basis for Task: Program requirement (40 CFR Section 123.24)<br>Output: Complete permit review packages |
| ~~CWA Section 106 (DWRM)~~ | ~~4~~ | ~~As per Section IV.C.1.j. of the State/EPA MOA, the State agrees to send selected NPDES draft permits for EPA's review in consideration of identified regional and/or national priorities or initiatives. Just as for the required permit categories, the State agrees to send the same information required under the MOA, including submission of a copy of the final permit after issuance.~~<br><br>~~EPA will track draft permits received.~~ | Recommendation: delete due to National Water Program Guidance<br><br>FDEP 05/04/20 Comment – Since this change was accepted, this item now shows as "strikethrough". |
| ~~CWA Section 106 (DWRM)~~ | ~~6~~ | ~~The State should consider the relationship between point source dischargers and drinking water intakes in setting permit requirements, and provide update on any activities related to the task.~~ | Recommendation: delete due to National Water Program Guidance<br><br>FDEP 05/04/20 Comment – Since this change was accepted, this item now shows as "strikethrough". |
| CWA Section 106 (DWRM) | 17 | NEW TASK: To improve permit quality, the State agrees to implement essential action items identified in the draft 2018-2023 Permit Quality Review (PQR) report as they become finalized and to likewise evaluate recommended action items. Essential action items are those that address deficiencies or non-conformance with federal regulations. In the 2012-2017 PQR cycle, these items were classified as "Category 1" and EPA considers all 2012-2017 Category 1 action items to be resolved. In addition, 2012-2017 recommendations previously identified as either "Category 2" or "Category 3" have been consolidated into a single "recommended" | Per email dated 2/26 from Marc Harris the state and EPA agrees on the new language.<br>Output: Effective NPDES permits. Report annually by September 30th |

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| | | category and EPA requests that the state agrees to continue to evaluate these recommended action items. | |
| CWA Section 106 (DWRM) | 19 | NEW TASK: The State agrees to update MS4 Phase II General Permits during the next permit cycle. Updates must have clear and enforceable permit requirements and ensure compliance with the Remand Rule (effective January 9, 2017). | New Task - EPA accepts FDEP's comments per call 2/25/20 |
| CWA Section 106 (DWRM) | 20 | NEW TASK: The State agrees to promote the use of green infrastructure and to consider incorporating green infrastructure requirements in stormwater permits. The State agrees to provide educational information to all permittees to encourage implementation of best management practices that include infiltration, evapotranspiration, harvesting and/or reusing storm water from new and redeveloped sites after construction is completed. | New Task - EPA accepts FDEP's comments per call 2/25/20 |
| ~~CWA Section 106 (DWRM)~~ | ~~21~~ | ~~New Task: The State agrees to enter accurate permitting and other data into PCS-ICIS or Permitting Management Oversight System (PMOS) in compliance with NPDES Electronic Reporting Rule. The State also agrees to enter and maintain minimum data elements as defined in Appendix A to 40 CFR Part 127.~~<br><br>~~The State will electronically transmit data to EPA within 40 days of when the State completes the activity or receives a report submitted by a regulated entity [40 CFR Part 127.23(c)(1)].~~ | New Task - EPA accepts FDEP's comments per call 2/25/20<br><br>FDEP 05/04/20 Comment – Since this change was accepted, this item now shows as "strikethrough". |
| **Program** | **Task Number** | **Workplan Task** | **EPA Comment** |
| CWA Section 106 (DEAR) | 2 | Third Party Data:<br>To enhance limited monitoring resources, and reduce duplication of efforts, the State will scientifically review "all existing and readily-available" data (FDEP & third party), for compelling evidence of water quality impairment or improvement and will use these data as indicators of water quality as appropriate. Where warranted, the State will monitor to supplement the available data to meet data requirements and thresholds for determining the waterbody's use support status and to confirm the actual water quality condition. The State will encourage other agencies and organizations to target monitoring to define baseline conditions or watershed | Recommend task modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br><br>Integrated Report (IR) and the Consolidated Assessment and Listing Methodology (CALM): In even calendar years, the State shall submit its biennial 305(b) report and Section 303(d) List as part of the Integrated 305(b)/303(d) Report (IR). The state will also provide updates to and refine the comprehensive, scientifically valid assessment and listing methodology |

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| | | improvement/restoration, where such monitoring is judged appropriate by State. | documentation to support the state's determination to list or not list waters [40 CFR 130.7 (b)(6) (i- iv)]. The documentation should include:<br>1) explain how the State identifies and considers all existing and readily available data and information;<br>2) articulate the basics of the quality assurance and quality control criteria used to evaluate data submitted by outside entities; and<br>3) explain the analytical approaches, including statistical analyses, used to infer true segment conditions from all valid existing and readily available information.<br><br>The State will document updates to the CALM used to develop their IR. As recommended in EPA IR guidance, the CALM should document the listing/delisting decision process and should be consistent with applicable water quality standards and with sound science and statistics. Prior to submission of its IR, the decision process the State describes in the methodology should provide all stakeholders with the opportunity to understand exactly how assessment decisions are made.<br><br>Basis for Task: 40 CFR 130.7 and 40 CFR 130.8; IR Guidance<br>Output: The State's IR and CALM.<br><br>CALM<br>10/1, odd numbered years; IR: 4/1, even numbered<br>Years |

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| CWA Section 106 (DEAR) | 7 | Reporting - § 305(b) or (ADB):<br>In even calendar years, the State shall submit its biennial 305(b) report and Section 303(d) List pursuant to CWA § 305(b) as part of the Integrated 305(b)/303(d) Report.<br><br>Each year, the State shall submit its annual electronic update of key monitoring information along with ADB-compatible assessment data, including any 303(d) List updates, for all the waters assessed during the previous year. The geo-referenced data files will include the minimum data elements in accordance with the Appendices A & B of the 2006 Integrated Report Guidance.<br>EPA has been and will continue to provide assistance in consolidating and updating FDEP's assessment data to input into the new ATTAINS system. Once the consolidation and the upload of the recently approved list into the ATTAINS system is complete, the state will be responsible to update their data in ATTAINS. | Recommend task language modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br><br>Integrated Reporting (IR) Assessment Attribute Data and Geo-referencing:<br>The State will provide electronic documentation of State water quality assessment decisions, attribute data, and geospatial data. This should consist of a complete database using required EPA data elements and schema, including waterbody segmentation changes for current and previous cycles. The State will also provide geo-referenced data files depicting the location of every Assessment Unit in the assessment database, submitted in the form of point, line and/or polygon Geographic Information System (GIS) layers or NHD reach indexing tables.<br><br>For the 2020 IR cycle, the redesigned Assessment and Total Maximum Daily Load (TMDL) Tracking and Implementation System (ATTAINS) system will replace the existing Assessment Database (ADB) systems, as well as incorporate the ATTAINS Web Express system used for submitting data to EPA and entering State statistical survey summary information. This system will provide one interface and data model for all IR information and will allow states to enter data via batch upload, direct data entry or through Exchange Network (EN) web services. States are encouraged to submit attribute data in draft form to ATTAINS as the system will streamline EPA review of the 303(d) List and will be the system of record for tracking strategic plan measures.<br><br>Basis: 40 CFR 130.7 and 130.8; IR Guidance; |

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| | | | Output: IR Assessment Attribute Data and GIS files in ATTAINS<br><br>DEP held a teleconference on January 30 with EPA Region IV staff to discuss uploading the "starting point" for the initial ATTAINS. DEP is working on this upload and will follow up with EPA on next steps for EPA's approval and additional information needed. ~~DEP is working on the 2020 IR report for submittal by April 1, 2020.~~ DEP is finalizing the 2020 IR report and submittal is anticipated to be in late April or early May" due to COVID response |
| CWA Section 106 (DEAR) | 4 | DEP is addressing EPA recommendations for aquatic life-based water quality criteria as part of the ongoing Triennial Review of Water Quality Standards, but revisions to human health-based water quality criteria are on hold pending a state-wide survey of fish consumption rates, which is being conducted under contract by UF. We are following public participation requirements for the Triennial Review rulemaking. | |
| CWA Section 106 (DEAR) | | New Task: Site Specific Criteria: The State will continue to develop site-specific water quality criteria to better protect the waterbodies in Florida and engage public participation under the requirements of 40 CFR part 25. | EPA agrees to delete per call 2/25/20 |
| **Program** | **Task Number** | **Workplan Task** | **EPA Comment** |
| PWSS SWDA Section 1443 & 1451 | P-1 | Revise current primacy programs to adopt new Federal Drinking Water regulations to implement the Safe Drinking Water Act and the amendments of 1996. Compliance with Primary Drinking Water Regulations Implementation (EPA State Program Manager to ensure that the State is on track with any tasks or actions the State will be using to ensure compliance with the Primary Drinking Water Regulations.) Commitments: Revise and/or adopt regulations in accordance with the SDWA. Submit a primacy application for EPA review and approval. The DEP districts and DOH delegated offices are responsible for conducting Sanitary Surveys and do so every three years for CWSs and NTNCs, and every five years for TNCs. | Recommend replacing language: (EPA State Program Manager to ensure that the State is on track with the compliance and implementation of these requirements) with the following instead: Ensure ongoing compliance with Primary Drinking Water Regulations by implementing State-Approved Rules for which State has received final primacy. Recommendation to move the following language to P3: "The DEP districts and DOH delegated offices are responsible for conducting Sanitary Surveys and |

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| | | | |
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| | | Sanitary Surveys are supplemented with follow-up inspections and complaint investigations as necessary, and annual inspections as resources allow. Oversight is provided at DEP headquarters. State Approved Rules:<br>*CCR; *APA; *Arsenic;<br>*FBRR<br>*New PWS Definition<br>*Operator Cert./ERG<br>*Radionuclide<br>*LCMR<br>*IESWTR<br>*Stage 1 DBPR<br>*LT1 IESWTR<br>*LCR STR<br>*Ground Water Rule<br>*Long Term 2 IESWTR<br>*Stage 2 DBPR<br>State Interim Primacy, Under EPA Review:<br>*rTCR<br>*PN | do so every three years for CWSs and NTNCs, and every five years for TNCs. Sanitary Surveys are supplemented with follow-up inspections and complaint investigations as necessary, and annual inspections as resources allow. Oversight is provided at DEP headquarters." |
| PWSS SWDA Section 1443 & 1451 | P15 | Develop and implement a Capacity Development strategy to assist public water systems in acquiring and maintaining technical, managerial, and financial capacity. Annual Report to EPA. Provide updates and reports to Drinking Water Section Capacity Development Coordinator and cc State Program Manager. | Recommend: next Triennial Capacity Development Report will be submitted by 9/30/20 |
| PWSS SWDA Section 1443 & 1451 | P19 | The State commits to accept for use only data that is generated in accordance with applicable methods and procedures presented or cited in 40 CFR Part 141, 40 CFR Part 142, 40 CFR Part 143, state PWSS Program primacy applications approved by EPA, and the EPA-approved Quality Management Plan. Commitments: Annual State QA data certification letter to accompany PWSS program grant application. State to provide to EPA Drinking Water Grants Coordinator an Annual Data Quality Certification Letter. | Submit QA Annual Certification for the PWSS program, prior to award |
| PWSS SWDA Section | E3 | Address with a formal enforcement action or return to compliance the number of priority systems equal to the number of PWS's that have a score of 11 or higher on the July 2017 ETT report (for FY18), July 2018 report (for FY19), and July 2019 report (for | For clarity, it may be helpful to remove the dates of ETT reports that pertain to previous-year's PWSS PPA Workplans |

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| 1443 & 1451 | | FY20). Note: All data pertaining to compliance status (i.e. formal enforcement activity or Return to Compliance) must be uploaded to SDWIS-Fed in time to show in the October 2018 ETT list (for FY18), October 2019 ETT List (for FY19), or October 2020 ETT list (for FY20) in order to be counted towards this commitment. (For most states this would be the August 15 upload unless a state is doing uploads more frequently than quarterly). | |
| PWSS SWDA Section 1443 & 1451 | PWSS Application Enhancements (State Priorities) | Implement enhancements and infrastructure upgrades to the existing PWS application to enable Florida's inspectors to record and document findings while in the field and conducting inspections.<br><br>Phase 1, Web Form Upgrades: Update the field inspection application infrastructure to replace the existing system's web forms with a modernized web interface that is consistent with the look and functionality of other programmatic applications being used by the Department's inspection staff. | FDEP change accepted |
| PWSS SWDA Section 1443 & 1451 | PWSS Application Enhancements (State Priorities) | Implement enhancements and infrastructure upgrades to the existing PWS application to enable Florida's inspectors to record and document findings while in the field and conducting inspections.<br><br>Phase 2, Disconnected process enhancement: Enhance the field inspection application system by replacing the existing system's functions for capturing and later uploading inspection information, when the field device in not able to receive a cellular connection, with one that is portable and independent of the field devices' operating system platform. | FDEP change accepted |
| PWSS SWDA Section 1443 & 1451 | PWSS Application Enhancements (State Priorities) | Implement enhancements and infrastructure upgrades to the existing PWS database application to allow for electronic reporting of analytical sampling data from certified laboratories to the state in accordance with DEP's paperless initiative. This project will also maintain data integrity and increase efficiency in reporting. | FDEP change accepted |
| PWSS SWDA Section 1443 & 1451 | PWSS Application Enhancements (State Priorities) | Implement enhancements and infrastructure upgrades to the existing PWS database application to allow for electronic application for Water main extension permits to the state within the Enterprise Self Service Authorization system in accordance with DEP's paperless initiative. This project will also maintain data integrity and increase efficiency and speed of the application process. | FDEP change accepted |

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| Appendix B | | | |
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| **Program** | **Task Number** | **Workplan Task** | **EPA Comment** |
| 106 | | DWP - Publicly Owned Treatment Works | EPA contact updated. |
| 106 | | Monitoring Program | EPA contact updated. |
| RCRA | | Permit Renewals | EPA contact updated. |
| **Appendix C** | | | |
| CAA-105 | IAQ-5 | ~~Submit a SIP revision to address nonattainment requirements for the 2010 SO2 NAAQS for areas designated nonattainment in 2017.~~ | FDEP change to remove task accepted. |
| CAA-105 | IAQ-31 | Submit annual reports on progress of sections 111(d) and 129 plans | FDEP change accepted. |
| CAA-105 | CCI-1 | The EPA requests that State, Local, and Tribal Air Agencies submit emissions information updates for major point sources to EIS database annually or as requested by the EPA Office of Air Quality Planning and Standards. Information on the EIS Gateway can be found at: http://www.epa.gov/ttn/chief/eis/gateway/index.html. The State and Local National Air Toxics Assessment (NATA / NEI) contact in the Air Data and Analysis Section should be notified via e-mail upon submittal to EPA. | FDEP change accepted. |
| CAA-105 | CCI-2 | Develop and submit to EPA, emissions inventory information for all applicable point sources, CAP pollutants and time frames consistent with the AERR Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The CAPs point source emissions inventories should be submitted to EPA Headquarters through the EIS Gateway by no later than December 31st each year. Early submittals are recommended. Information on the EIS Gateway can be found at: http://www.epa.gov/ttnchie1/eis/gateway/. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2017 submittal is made to the EIS. | FDEP change accepted. |
| **Program** | **Task Number** | **Workplan Task** | **EPA Comment** |
| RCRA Section 3011(a) | ALL | Submit the final 2020 Financial Status Report (FSR) for all grants covered under the PPG. | FDEP change accepted. |

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| RCRA Section 3011(a) | p.3 Dev&Adm | Submit 2020 End-of-Year Report summarizing the state's accomplishments to include:<br>• Program Development and Authorization accomplishments;<br>• Compliance Monitoring & Enforcement accomplishments;<br>• Permitting accomplishments;<br>• Corrective Action accomplishments;<br>• Actual versus Estimated Costs;<br>• Compliance Assistance Outreach;<br>• TSD Inspection Lists;<br>• Training Summary & Details. | The state's schedule for submitting Checklists that the state plans to seek authorization for and the schedule for submitting draft statutory and/or regulatory changes for EPA to review were deleted from this section. This information is also not listed in "2020 Appendix A final draft". |
| RCRA Section 3011(a) | p.13 Corr Act | Report to EPA via translation of the state's permitting and corrective actions data to RCRAInfo. | Does not contain any RCRA permitting projections nor commitments. In order to set the FY2020 RCRA permitting commitments with the EPA HQs, Region 4 needs commitment numbers from our States. Region 4 requests from Florida to provide the number of RCRA permit renewals that the State would commit to issuing during FY2020. The list of facility names should be provided with the response to this comment. Also, does not contain any GPRA corrective action projections nor commitments. In order to finalize the FY2020 GPRA corrective action national targets with EPA HQs, Region 4 requests annual commitments from our States. Region 4 requests that Florida provide the number of GPRA commitments for corrective action (CA725, CA750, CA550, CA800, CA900/999) that the State projects as accomplishments during FY2020. The list of facility names should be provided with the response to this comment. |
| **Program** | **Task Number** | **Workplan Task** | **EPA Comment** |
| ~~CWA Section 106 (DEAR)~~ | ~~DEAR - Watershed Task 1~~ | ~~Report on activities and efforts to develop and implement BMAPs.~~ | Based on the modification to The EPA National Water Program Guidance,<br>the Watershed tasks are no longer an Agency priority. Change accepted. |

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| CWA Section 106 (DEAR) | TMDL-303d – Task 2 | The state will provide to EPA on even years concurrent with submittal of the 303(d) list a prioritization for developing TMDL for all waterbodies (and causes of impairment) on that Section 303(d) list. The prioritization should be consistent with State's long-term prioritization and EPA's guidance in the 2016 IRG Memo. | Recommend task language modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br><br>Comprehensive TMDL Development Prioritization: The State agrees to provide to EPA, on even years concurrent with submittal of the 303(d) list, a prioritization for developing TMDLs for all waterbodies (and causes of impairment) on the Section 303(d) list. This prioritization should be consistent with the state's long-term prioritization and EPA's guidance in the IRG Memo.<br><br>Basis for Task: Statutory Requirement Section 303(d)(1)(A) and EPA Long-Term Vision<br><br>Outputs: TMDL Development Ranking for all current 303(d)-Listed Waters (Region 4 and the State should agree on the appropriateness of these rankings.)<br><br>4/1 even years<br>Change accepted |
| CWA Section 106 (DEAR) | TMDL-303d – Task 3 | The State will provide to EPA a TMDL Development Schedule for development of TMDLs and alternative restoration approaches, FY 19 and FY 20, identifying the specific waterbodies and pollutants of concern when identified and planned for TMDL development and the estimated date for submitting the TMDLs to EPA for approval. The State will provide EPA with an updated development schedule when significant changes occur.<br>EPA recognizes that State TMDL Programs are transitioning as consideration is given to how to achieve the new CWA 303(d) | Recommend task language modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br><br>Final TMDL and Alternative Restoration Approach Submittals<br>The State agrees to submit to EPA final TMDLs, which include: (1) a responsiveness summary; (2) |

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| | | Vision and the associated goals and metric. EPA also recognizes that some flexibility will be needed in this schedule. | copies of all comment letters received (if requested by EPA); (3) technical support information such as the applicable water quality standard, source assessment, data analysis, water quality monitoring and modeling assumptions, and calculation methods; and (4) as appropriate, the loading capacity analysis (model), supporting input data, and a modeling report. In addition, the state is encouraged to transmit all relevant geospatial data and information for the TMDL to EPA.<br><br>Based on the Long-Term CWA 303(d) Vision, a State has the option to develop an alternative restoration approach comprised of pollution controls that, when implemented, will lead to attainment of water quality standards. The State will provide to EPA the required information to support these alternatives for the 303(d) List.<br><br>For guidance on requirements for Category 5-alt or 4B listing, the State should refer to the following EPA documents, respectively: (1) Integrated Report Memo Section on the CWA Vision Implementation, (2) Voluntary Integrated Reporting Subcategory for Waterbodies with Implementable Water Quality Restoration Activities and (3) Recommended Structure for Category 4B Demonstrations. In addition, the state is encouraged to transmit all relevant geospatial data and information for the Alternative |

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| | | | Restoration Approach to EPA.<br><br>Basis for Task: 40 CFR §140.7(c)(1), EPA Strategic Plan<br>Program Activity Measure (PAM) WQ-27, EPA Long-Term Vision<br>Output:<br>Final TMDLs for<br>EPA approval, which include all required elements, a responsiveness summary, technical support information, and additional information when requested by<br>EPA. Alternative Restoration Approach documents (i.e., 5-alternative, 4B)<br><br>As completed per the Development Schedule<br>Change accepted |
| CWA Section 106 (DEAR) | TMDL-303d | NEW TASK:<br><br>For FY20 and the FY21<br>Development Schedule: The State agrees to provide EPA a list of all TMDLs and<br>alternative restoration approaches, planned for the fiscal years 2020 and 2021,<br>identifying the specific waterbody/impairments combinations. The state agrees<br>to indicate which TMDLs and/or<br>alternative restoration approaches will address priority waters under the CWA<br>Vision (i.e., WQ-27 universe).<br><br>The<br>State agrees to provide EPA with an<br>updated development schedule should significant changes occur. | Change accepted per call 2/26/2020 |
| CWA Section 106 (DEAR) | TMDL-303d | NEW TASK: TMDL Progress Report: The State agrees to participate in regular conference calls with the Region and provide a progress report on all TMDLs and alternative restoration approaches | Change accepted |

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| | | scheduled for development in the current fiscal year. This report will include any revisions to the current fiscal year Development Schedule dates (See earlier Task above) and cause for revision. | |
| CWA Section 106 (DEAR) | TMDL-303d | NEW TASK: Integrated Reporting - §303(d), §305(b), Assessment Database Compatible Spreadsheet, and Geo-referencing: The State agrees to submit its biennial 303(d) List and enter data into ATTAINS. The state agrees to submit the List in the even calendar years. | Change accepted |
| ~~CWA Section 106 (DEAR)~~ | ~~WQSP~~ | ~~Reporting~~<br>~~- The state agrees to submit a written status report of all WQS activities in the State.~~ | New task - EPA agrees to delete per call on 2/25/20 |
| CWA Section 106 (DEAR) | Assessment7<br><br>Assessment 2/ Monitoring 7 | Reporting - § 305(b) or (ADB): Output: 2016 annual electronic update.<br><br>Third Party Data:<br>Report use of third party data to support and supplement water quality monitoring, assessments and related activities.<br>EPA has been and will continue to provide assistance in consolidating and updating FDEP's assessment data to input into the new ATTAINS system. Once the consolidation and the upload of the recently approved list into the ATTAINS system in complete, the state will be responsible to update their data in ATTAINS. | Recommend task modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br><br>Integrated Report (IR) and the Consolidated Assessment and Listing Methodology (CALM): In even calendar years, the State shall submit its biennial 305(b) report and Section 303(d) List as part of the Integrated 305(b)/303(d) Report (IR). The state will also provide updates to and refine the comprehensive, scientifically valid assessment and listing methodology documentation to support the state's determination to list or not list waters [40 CFR 130.7 (b)(6) (i- iv)]. The documentation should include:<br>1) explain how the State identifies and considers all existing and readily available data and information;<br>2) articulate the |

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| | | | basics of the quality assurance and quality control criteria used to evaluate data submitted by outside entities; and 3) explain the analytical approaches, including statistical analyses, used to infer true segment conditions from all valid existing and readily available information.<br><br>The State will document updates to the CALM used to develop their IR. As recommended in EPA IR guidance, the CALM should document the listing/delisting decision process and should be consistent with applicable water quality standards and with sound science and statistics. Prior to submission of its IR, the decision process the State describes in the methodology should provide all stakeholders with the opportunity to understand exactly how assessment decisions are made.<br><br>Basis for Task: 40 CFR 130.7 and 40 CFR 130.8; IR Guidance<br>Output: The State's IR and CALM.<br><br>CALM 10/1, odd numbered years; IR: 4/1, even numbered years |
| **Program** | **Task Number** | **Workplan Task** | **EPA Comment** |
| ~~CWA Section 106 (DWRM)~~ | ~~DWRM-STMWTR 1-2-5~~ | ~~The State will assist EPA to conduct Annual Evaluations of progress in implementing commitments by submitting the Stromwater Program's Annual Evaluation to include:~~ | Recommendation: delete due to National Water Program Guidance |

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| | | ~~● the anticipated dates by which MS4s for phase I municipalities, MS4s for phase II municipalities (general and/or individual permits), and construction general permit permits will be noticed as draft for public review/comment and issued as final; or~~<br>~~● for each permit identified that has been expired for more than one year, provide the steps/measures that the State is taking to reissue the permit, the status of the draft permit, and proposed issuance date until the final permit is issued.~~ | Change accepted |
| ~~CWA Section 106 (DWRM)~~ | ~~DWRM-STMWTR 3~~ | ~~The State agrees to provide annual reports for municipalities located in targeted/priority watersheds.~~ | Recommendation: delete due to National Water Program Guidance<br><br>Change accepted |
| ~~CWA Section 106 (DWRM)~~ | ~~DWRM-STMWTR 4~~ | ~~The State agrees to provide EPA with a list of the permitted activities covered by their construction general permit and include the following associated data:~~<br>~~- location of each activity (e.g., latitude, longitude);~~<br>~~- discharge information (e.g receiving waterbody or MS4 operator)~~ | Recommendation: delete due to National Water Program Guidance<br><br>Change accepted |
| ~~CWA Section 106 (DWRM)~~ | ~~DWRM-NPDESPermit~~ | ~~The State agrees to keep the data in the Permit Management Oversight System (PMOS) up-to-date for high priority permits, MS4 permits, and for all general (generic) permits. Most importantly, issuance/expiration dates should be kept current. For general permits, also update the total # of facilities covered under each GP on a semi-annual basis.~~ | EPA is in agrement to delete, per call 2/25/2020 |
| ~~CWA Section 106 (DWRM)~~ | ~~Enforcement 2~~ | ~~Submit the Quarterly Noncompliance Report (QNCR) within 10 days of publication. Provide brief written annotations denoting compliance/ enforcement status when a QNCR-listed permittee is determined to be in Significant Noncompliance (SNC) for 2 or more quarters by ICIS-NPDES. Execute and submit copies of draft and final enforcement actions, as requested.~~<br>~~*Dates dependent upon ICIS-NPDES operations; regulatory dates are noted.~~ | Change language to: Region 4 will generate and review the Quarterly Noncompliance Report (QNCR) (major and minor facilities) and discuss any concerns with the State. This will provide the State an opportunity to correct any data discrepancies in ICIS before public dissemination of the report. Use of the QNCR will continue until such time that it is supplanted by the NPDES Noncompliance Report (NNCR).<br><br>EPA concurs with removing rows 10 & 11 since it appears to be the previous year's language that |

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| | | | rows 18 & 19 were designed to replace. To fully address FDEP's comment, we would like to provide additional clarification that, at this time, the SNC list only includes individually permitted facilities, not ones under general permits. "Sources" does refer to "facilities". |
| ~~CWA Section 106 (DWRM)~~ | ~~Enforcement 3~~ | ~~The Coordinator's Report (previously Facilities Watch List) or equivalent oversight mechanism will be provided to the State on a quarterly basis. Within 15 days of being notified by EPA, the State shall execute a formal enforcement action, refer the facility to EPA for enforcement, or provide a written explanation of either why no formal action is appropriate or the type of formal action being taken, with a projected date of action. Execute and submit copies of draft and final enforcement actions, as requested.~~<br>~~*Due date may vary depending on the generation and state notification date.~~ | 1. Changed Report Title.<br>2. Change language to: On a quarterly basis, Region 4 will provide the significant noncompliance (SNC) list for major and minor source permits to the State for comments and discussion. The State agrees to provide a written explanation for all major facilities on the report within 15 days of receipt. For the minor sources, the State agrees to work with EPA to address noncompliance issues in accordance with the SNC National Compliance Initiative (NCI) to reduce the SNC noncompliance rate. For major facilities, within 30 days of being notified by EPA of noncompliance or SNC list generation, the State agrees to execute a formal enforcement action, refer the facility to EPA for enforcement, or provide written explanation of either why no formal action is appropriate or the type of formal action being taken, with a projected date of action. The State shall submit copies of draft and final enforcement actions, as requested.<br><br>EPA concurs with removing rows 10 & 11 since it appears to be the previous year's language that rows 18 & 19 were designed to replace. To fully address FDEP's comment, we would like to provide additional clarification that, at this time, the SNC list only includes individually permitted |

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| | | | facilities, not ones under general permits. "Sources" does refer to "facilities".<br><br>FDEP 05/04/20 Comment – Since this change was accepted, this item now shows as "strikethrough". |
| CWA Section 106 (DWRM) | Enforcement 4 | The WET Report will be generated by EPA and provided to the State on a quarterly basis along with the FWL or equivalent oversight mechanism. Within 15 days of being notified by EPA of WET Report generation, the State shall provide a written explanation for all facilities on the report. This response shall include any additional test results for the facilities on the report that have not been entered into ICIS and/or have occurred since the date of the WET Report. The response shall also include a sufficient description of the enforcement history, present actions taken (formal and informal), including a summary of any TIE/TRE work conducted, and the dates that the violations were resolved or are expected to be resolved will be provided. The State shall execute and submit copies of draft and final enforcement actions, as requested. | 1. Added Amanda Driskell as contact.<br>2. Change language to: A WET report (sometimes referred to as the WET Watch List) will be generated by EPA and provided to the State on a quarterly basis along with the SNC list. The State agrees to provide a written explanation for all facilities on the report within 15 days of receipt. This response shall include any additional test results for the facilities on the report that have not been entered into ICIS and/or have occurred since the date of the WET Report. The response shall also include a sufficient description of the enforcement history, present actions taken (formal and informal), including a summary of any TIE/TRE work conducted, and the dates that the violations were resolved or are expected to be resolved.<br><br>Change accepted |
| CWA Section 106 (DWRM) | Enforcement<br>8.a.<br>9.a.<br>9.c.<br>9.d.<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17 | Enter and maintain the following data into ICIS-NPDES:<br>● CAFO facilities with NPDES permits and the date of the most recent inspection<br>● PCIs and audits of active approved POTW pretreatment programs, including associated data such as number of SIUs and POTW compliance with Enforcement Response Plans;<br>● POTW pretreatment program performance reports per 40 CFR 403.12(i) shall be tracked, and 100% of submissions will be reviewed to determine if appropriate permitting and enforcement of SIUs is being accomplished by POTWs by the end of the FY19;<br>● oversight activity related to SIUs actively discharging, or pursuing discharge, to POTWs without active approved programs by the of FY19; | Recommend task modification to reflect updated Agency regulations and/or National Water Program Guidance priorities:<br>ICIS-NPDES Data Entry.<br>State agrees to comply with Phase 1 of the NPDES Electronic Reporting Rule [40 CFR Parts 9, 122, 123, 124, 127, 403, 501, and 503]. As data elements are available in ICIS-NPDES, enter and maintain minimum data elements as defined in appendix A |

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| | | ● all RIDE (or WENDB) data elements entered within 15 days after the fact, except as specified elsewhere;<br>● current effluent limits and monitoring requirements for all major dischargers within 30 days after the effective date of the permit;<br>● each month, maintain at least 95% data entry rate for DMR parameters for facilities currently tracked under WENDB requirements entered within 58 days after the end of each monitoring period;<br>● all inspection data for NPDES program areas entered within 30 days of completion of the inspection report, but no later than 45 days from the date of the inspection, and all other information (single event violations) must be entered within 90 days of inspection so that all information for the current FY is entered by no later than December 31st;<br>● all Single Event Violations, except those automatically identified by the system (e.g., if DMR data entered, effluent violations need not be identified as SEV) entered within 90 days of discovery of violation.;<br>● all formal and informal enforcement actions entered within 30 days of issuance of the enforcement action;<br>● penalties assessed and collected entered within 30 days of date of collection;<br>● NPDES permit and enforcement schedule data within 30 days of issuance; and<br>● completion of schedule milestones entered within 30 days of notification of completion. | to 40 CFR Part 127, including (but not limited to):<br>·<br>Basic permit, facility, permit schedules, and narrative conditions for all NPDES permits;<br>·<br>Permitted features, limit sets, and limits for all dischargers;<br>·<br>Discharge Monitoring Reports (DMRs) for all dischargers (major and minor);<br>·<br>Compliance monitoring activities and violation determinations;<br>·<br>Formal and informal enforcement actions, enforcement schedules, enforcement limits;<br>·<br>Penalties assessed and collected;<br>·<br>NPDES permit and enforcement schedule data; and<br>Single Event Violations, except those automatically identified by the system (e.g. if DMR entered, effluent violations need not be identified as SEV)<br><br>Change accepted |
| CWA Section 106 (DWRM) | Enforcement 3 | Region 4 will generate and review the Quarterly Noncompliance Report (QNCR) (major and minor facilities) and discuss any concerns with the State. This will provide the State an opportunity to correct any data discrepancies in ICIS before public dissemination of the report. Use of the QNCR will continue until such time that it is supplanted by the NPDES Non-Compliance Report (NNCR). | Change accepted<br><br>FDEP 05/04/20 Comment – added Task number |

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| CWA Section 106 (DWRM) | Enforcement 4 | On a quarterly basis, Region 4 will provide the SNC list for major sources and a high priority SNC list for minor source permits to the State for comments and discussion. The State agrees to provide a written explanation for all major facilities within 15 days of receipt. For the minor sources, the State agrees to provide written explanation for facilities listed in the high priority SNC list, which will be a subset of all minor, individual permit facilities in SNC, within 15-30 days of receipt. For major facilities, within 30 days of being notified by EPA of noncompliance or SNC list generation, the State agrees to execute a formal enforcement action, refer the facility to EPA for enforcement, or provide a written explanation of either why no formal action is appropriate, or the type of formal action being taken, with a projected date of action. For the minor facilities, the state agrees to work with EPA to address the noncompliance issues in accordance with the SNC National Compliance Initiative (NCI) to reduce the SNC noncompliance rate. The State shall submit copies of draft and final enforcement actions, as requested. | Changed accepted<br><br>FDEP 05/04/20 Comment – added Task number |
| CWA Section 106 (DWRM) | Enforcement | ~~5 a. CORE PROGRAM - AFO/CAFO Facilities The State agrees to notify Region 4 of any discovered unauthorized, or alleged unauthorized discharge to waters from any animal feeding operation regardless of whether such operation maintains a state issued NPDES permit to discharge to waters. The State agrees to submit reports of these findings no later than November 30 (for Jul – Sept); February 28 (for Oct – Dec); May 31 (for Jan – Mar); and August 31(for Apr – Jun) of each year.~~<br>5 b. CORE PROGRAM – Stormwater The stormwater program will continue to use the Address Comparison Tool to help states identify an accurate universe of facilities that require an industrial stormwater permit and to look for corporate noncompliance across state lines. The region plans on making this tool available to all states, ideally by the end of FY19. Because of the significant environmental impacts that can be obtained thorough permit compliance, EPA's stormwater program will work with each state to strategically inspect MS4s, both Phase I and Phase II.<br><br>5 c. CORE PROGRAMS - Resource Extraction For fiscal years 2020-2021, EPA Region 4 has identified the | For the last several years, FDEP has been providing the documentation to meet this item. EPA's expectation for this year is that FDEP continues to provide exactly what they have provided for the last several years and EPA would like to clarify that we are not requesting a new product.<br><br>FDEP 05/04/20 Comment regarding Task 5a - If EPA is not requesting a new product, then why is Task 5a labeled as a "new task"? If FDEP is to continue to supply the same information that we have for the last several years as outlined in Task 8c, then this item is duplicative and should be removed. |

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| | | resource extraction industry as having the potential to significantly contribute industrial pollutants to the nation's waters and has defined the industry to include coal mining, mineral mining, and metal mining. This includes a universe of approximately 5,000 facilities. Region 4 intends to work collaboratively with the State NPDES program throughout the targeting and inspection process. EPA is asking the states to provide assistance in understanding the multiple agencies involved in regulating the resource extraction industry. EPA will make additional efforts to coordinate and communicate with states where comprehensive environmental solutions require simultaneous compliance under the Clean Water Act from both authorized and nonauthorized programs. | |

## Appendix D

| Program | Task Number | Workplan Task | EPA Comment |
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| App. D | | Appendix D - Enforcement | Commitment is for "10% of new NOIs received each year". This was discussed with FDEP in the past. The national Compliance Management Strategy requires 10% of the universe, not just those NOIs for that year. There are numerous construction projects that go on more than a year and if they are not part of the 10% then they would never be inspected.<br><br>There also is no stormwater universe reflected.<br><br>Per the CMS, Phase I and Phase II MS4s are required to determine compliance for each MS4 at least once every 5 years, therefore 20% per year is needed for Phase I and Phase II grant commitments. EPA compared FDEP's proposed percentages to the CMS commitments and notes that 14% of the MS4 Phase II universe equals 70% of the universe over 5 years instead of 100% of the universe as required by CMS. Based on the CMS commitment, EPA requests 20% for MS4 Phase IIs & accepts the 10% of CGP sites. EPA |

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| | | | would like to ensure that FDEP understands that 10% of CGP sites applies to all regulated construction sites, and not necessarily the static construction site universe number listed in the excel table.<br><br>FDEP 05/04/20 Comment - This Phase II MS4 inspection commitment of 14% of the universe has been in our 106 workplan since 2009. At this time, we are unable to commit to 20% as the NPDES Stormwater Program has two vacancies and is also expecting the universe to increase by 35% due to the upcoming census. This item can be re-visited in 2021.<br><br>During the 02/25/20 call, FDEP offered to increase to 16% as a compromise, but we never had a teleconference/email exchange with EPA program contacts to settle this matter. FDEP would also like to discuss the use of "off site desk audits" if the increase to 16% is acceptable and how to properly code those in ICIS.<br><br>The Compliance Monitoring Strategy (CMS) states, "To determine the applicable universe at the inspection planning stage, the 10% goal should be applied **to the estimated number of active regulated construction sites** in the state in the coming year." Based on this guidance, we've updated the commitment to read "10% of active regulated construction sites" and we've also updated the universes for each district office in Appendix D.<br><br>Since the CMS also states "The minimum recommended inspection frequency for this metric is a joint EPA and state goal to inspect at least 10% of the regulated construction sites annually". As such, we would like to see EPA |

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| | | | greatly increase the numbers of inspections they conduct in Florida in an effort to achieve our joint goal. |

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