

PERFORMANCE PARTNERSHIP AGREEMENT (PPA) FY 08
Between
THE DIVISION OF DRINKING WATER (STATE)
And
REGION VIII U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)

Preamble

This is a performance partnership agreement between the Division of Drinking Water hereinafter referred to as “State” and the Drinking Water Program within the Environmental Protection Agency’s Region VIII office, hereinafter known as “EPA”. The purpose of this agreement is to ensure, to EPA’s satisfaction, that the delegated drinking water programs are satisfactorily administered.

Maintain Core Programs

The State will maintain and implement the core programs, as required by federal and state statutes and rules, and as reflected in program authorizations and other formal agreements.

Maintain National Databases

The State commits to properly transfer data into regional and national data systems, where federally required data fields are kept current, and that the data is entered accurately and pursuant to definitions and policy. The State will use the SDWIS-State software to accomplish this task. Prior to each submittal, State will perform the error checks resident with FEDREP and make appropriate adjustments with the data to ensure an accurate submittal. EPA agrees to accept the error checked files submitted by State and release them to SDWIS-ODS. The State commits to maintain its database and assist, when requested to do so and as resources are available, those responsible for the national database. This includes data entry, quality assurance and data validation for assuring timely and complete updating of information for the purpose of data retrieval by EPA staff and managers.

The State commits to transmit water system inventory information and violation and enforcement data to SDWIS within 45 days after the end of each calendar quarter. For systems identified on the SNC lists, the State will look at all the violation and submit SDWIS “return to compliance” information where applicable.

The State will employ internal management practices to verify complete data reporting. EPA will review the results of the 2007 EPA Data Verification and create a plan with the State to resolve deficiencies identified in the DV. EPA’s Regional or Headquarters data management staff agrees to expeditiously correct any data transfer issues within their respective data systems and EPA Regional program staff agree to extend programmatic timelines as appropriate.

Implementing New EPA Rules

State will ensure new regulatory violations are tracked and reported to SDWIS the quarter after occurrence. When final guidance is issued, the State will start working on implementing reporting requirements. EPA Region VIII commits to provide the State the SDWIS reporting mechanism as soon as it's available from EPA HQ, prior to any new regulatory implementation date, if possible.

EPA Region VIII will provide information/instructions and/or documentation specific to the new codes used to report compliance assistance visits (a new code under sanitary surveys) and the State will report these visits as well as Sanitary Surveys on a quarterly basis to SDWIS. The State will also use the new SDWIS code to report follow-up visits for formal enforcement as they occur. If the State does not have an approved primacy package for any new rule the State commits, for rules that are enforceable by EPA, to provide EPA a list of violators within 60 days of identifying non-compliance. We have responded as requested.

EPA recognizes that State must go through an extensive process to adopt new regulations. Further, EPA recognizes that it is desirable for State to go through the process only once. Therefore, EPA commits to make its best effort to timely review and provide feedback on all interim primacy packages submitted so as to eliminate, where feasible, any potential changes to the final package submission. EPA and Utah recognize that the State has interim primacy consistent with SDWA 1413(c) from the date of submission of its final rule package.

TCR/SWTR

By November 15, 2007, the State will provide to EPA an updated list of all systems that are required to filter under SWTR, but are not yet filtering. This list shall differentiate non-filtering surface water systems, together with non-filtering subpart H ground water systems under surface water influence, into distinct categories. These will be: (i) those non-filtering systems to be reported to EPA as violators in the format used for quarterly CAP meetings and whose violations will be uploaded to the EPA drinking water national data base, (ii) those non-filtering systems not under any compliance schedule and to be reported to EPA along with documentation of the State's rationale, proposed action, and timeframe for securing an enforceable compliance schedule, (iii) those non-filtering systems legitimately still on compliance schedules and to be reported to EPA as such along with the schedules from their respective enforcement documents, and (iv) non-filtering systems to be reported to EPA as needing additional State action or State time in the initiation-to-completion timeline for intended groundwater-under-the-influence-of-surface-water assessments.

STATUS: *List has been updated regularly on a quarterly basis. New systems determined to be UDI are entered into SDWIS as UDI, older determination are in progress of being added. DDW staff have developed a template letter for classifying UDI source, as well as an excel spreadsheet to track the progress of MPA sampling and follow up on UDI sources.*

Safe Drinking Water Act Enforcement

The State commits to annotating the quarterly SNC lists, and will return the annotations to EPA within 30 days of receipt of the list and periodically thereafter as appropriate. EPA recognizes that it is its responsibility to deliver the list to the State in a timely manner to enable the State to meet its deadlines.

STATUS: *The State has responded as requested.*

The State commits to either: a) conduct formal enforcement, as appropriate, or b) refer the system to EPA for enforcement on all unresolved SNCs within six months of becoming identified as an SNC, with the goal of taking action before systems reach SNC status. It is possible that OECA will develop and implement a new SNC/Enforcement Response Policy and the PPA negotiations may have to take this into consideration. The State commits to addressing SNCs before they become Exceptions and the goal is to take action to prevent Exceptions.

STATUS: *The State is very proactive in contacting systems and working with other partners to prevent Exceptions.*

The State commits to providing EPA a copy of all settlement agreements for systems identified as SNC's, both administrative and judicial, including penalty calculations (documenting gravity and economic benefit calculations) and any penalty justifications. These will be provided no later than November 15, 2007.

STATUS: *The State has responded as requested.*

The State commits to reviewing and revising State enforcement escalation policies to ensure enforcement actions occur before a system becomes a SNC, the policies address all types of violations relating to EPA's regulations (including the Disinfection Byproducts, LT2 Surface Water Treatment Rule, etc.), and provide a response to these violations. The State commits to revise, incorporate EPA input into, finalize and implement the State's enforcement escalation policy by October 31, 2007. The State will include escalation of enforcement actions, for those systems that continue to violate, to penalize or AG referral in their escalation policy.

STATUS: *The State has responded to systems based on the system IPS score and discussions during the quarterly compliance meetings in the best manner to achieve a compliant system, including technical assistance, changing the system rating, administrative orders, bilateral compliance agreements and AG referrals.*

Until such time as a State's enforcement escalation policy is approved, EPA will evaluate State performance, and take direct enforcement actions as needed, in order to prevent SNCs from becoming Exceptions, or to address existing Exceptions.

The State will ensure that violation letters are sent to PWSs for each violation incurred utilizing management tools that could include evaluating the success of rule managers in completing this task

during their performance appraisal and spot-checking during the year to assist in determining this success. (UEOS oversight item.)

STATUS: *Rule managers have been evaluated and guidance given as appropriate.*

Safe Drinking Water Enforcement Oversight

The State agrees that EPA will use the new version of the Uniform Enforcement Oversight System (UEOS) for evaluating the State's enforcement performance in FY 2007. The State will be given the opportunity to reconcile the national database information and review a draft report of the assessment before the enforcement evaluation is finalized.

Except as noted below, the State shall commit to conducting sanitary surveys every three years for community surface water systems (or 33.3%) and every five years for non-community surface water and ground water systems or 20%). State reserves the right to survey those Subpart H systems deemed by State to be well maintained and operated, every five years rather than the three year frequency noted above. Sanitary survey reports are to be completed within 90 days of completion of field work. EPA will request copies of up to 25 sanitary survey reports after the end of the FY for the purpose of conducting an oversight evaluation. The State commits to entering all sanitary surveys and technical assistance visits into SDWIS by November 15, 2007 or provide EPA a list of sanitary surveys by PWS and source) completed in FY 2007.

STATUS: *The State has responded as requested.*

The default frequency for Utah has been every three years for all types of water systems. The State is in the process of developing a matrix of evaluating sanitary survey frequency based on system performance. This matrix consists of many factors indicative of system performance such as no significant deficiencies, low IPS points, no quality violation, no monitoring violation, etc. For the outstanding and well-performing water systems, the State may consider to conduct sanitary surveys at a lesser frequency such as once every five years.

The State will upload all enforcement actions and applicable return to compliance codes into SDWIS-Fed quarterly, and particularly by June 30, 2008 for all such actions completed by that date. This will enable EPA to complete its required reporting to EPA HQ by October 1, 2008. The State recognizes that not uploading enforcement actions not only creates false exceptions, but also provides a misrepresentation of the State's enforcement efforts to anyone using the national database. EPA will support the State's efforts in seeking a SDWIS automated return to compliance computer program.

STATUS: *The State has done this repeatedly.*

The State will develop management and employee tools for tracking systems that are under

enforcement which could include employees submitting a quarterly case status report to management for systems under enforcement.

STATUS: *The State has assigned a point person a tracking tool has been outlined pending replacement of programming staff.*

The State is aware that EPA will issue a press release twice each year listing the federal enforcement actions that EPA has taken in Utah for the previous six month period. EPA will confer with the State regarding the compliance status of EPA orders issued to Utah PWSs, will list the violations contained in the orders and their current compliance status (according to the SNC definition of compliance) in the enforcement press release, and will provide a courtesy copy of the press release 24 hours prior to the release.

As with all EPA press releases, the content will be non-negotiable unless it's a clerical error such as was fixed with the misspelling of Heber last time, and this agreement is only applicable to the 2008 PPA.

Sanitary Surveys

The State shall submit to the EPA Region VIII Drinking Water Program an evaluation of its program for conducting Subpart H System Sanitary Surveys in accordance with 40 CFR 142.16(b)(3) during calendar year 2007 as required by 40 CFR 142.15(a)(5) by February 15, 2008.

STATUS: *The State has responded as requested.*

DEPARTMENT OF ENVIROMENTAL QUALITY

DIVISION OF DRINKING WATER FY 2008 GOALS-END OF YEAR

I. ENVIRONMENT

Drinking Water

1. The Rules Section will work to improve the reporting of analytical data to Division of Drinking Water (DDW) by enabling the electronic transfer of laboratory analytical data.

Measures:

- a. By August 2007, the Rules Section will meet with the State Lab and ChemTech/Ford to explore the electronic transfer of analytical data and to outline the steps necessary by each party to be able to transfer the data.
- b. In October 2007, EPA will present a status report at the ASDWA annual conference on its efforts to standardize the electronic submittal of parametric data from certified laboratories to State Primacy Agencies' SDWIS databases.
- c. The Rules Section in conjunction with each laboratory will develop an outline of milestones that each entity must meet in order to facilitate electronic transfer of data by December 31, 2007.
- d. DDW, in consultation with the Drinking Water Board, will adopt rules by June 30, 2008, that require the electronic submission of analytical data consistent with EPA guidelines for processing directly into the SDWIS database.

STATUS: *This is an on-going task; many labs are submitting bacti data. The programming and process will need to be upgraded to work with SDWIS web release 2.*

2. The Field Services Section will establish logical grouping of water systems and rotation of surveyors amongst the grouping.

Measures:

- a. Field Services staff will identify system groupings by logical geographical areas and systems that can be "bundled" together for conducting sanitary surveys. This task will be completed by October 1, 2007.

STATUS: *This has been completed. There will be a phase in period because of the overlapping of surveys that have already been completed. Surveys that don't get completed during the assigned year also poses problem to phasing this program in.*

- b. Field Services staff will establish sanitary survey assignment groupings by logical geographical locations to achieve the most efficient use of surveyor time and travel. This will take into account multiyear scheduling to enable all systems within a geographical area to be surveyed the same year to the extent possible. This task will be completed by December 1, 2007.

STATUS: *This is complete.*

- c. Sanitary survey assignments will be rotated between local health departments, district engineers (where applicable) and Division sections so that a different group will conduct subsequent surveys. Calendar year 2008 survey assignments will be completed by January 1, 2008.

STATUS: *This has been done to the extent possible. The LHD's in Salt Lake, Davis, Tooele and Wasatch counties to all of the surveys. The Tri-county doesn't want to do any surveys. This poses some major problems in trying to implement a program of this nature. To accomplish this, the contracts with the LHD's would need to be renegotiated. Serious consideration needs to be made as to either the importance of grouping the surveys or having different eyes see the various water systems. In some cases a decision needs to be made as to which is more important.*

- d. A realignment schedule will be forwarded to EPA Region VIII so they can account for reasons why a three year frequency would not be met in favor of building efficiencies, as well as have the assurance that a given system would eventually be surveyed.

STATUS: *For the most part, the three year frequency is being met as far as scheduling them. The problem has been with staff and LHD's not following up and completing their surveys. The lack of follow through interferes with the three year scheduling, grouping and the systems being visited by different surveyors.*

II. CUSTOMER SERVICE

Drinking Water

3. The Construction Section will improve the State Revolving Loan Fund (SRF) Program to include: Allowance for funding of automated meters, require all applicants to complete a vulnerability assessment and emergency response plan, make adjustments to the interest rate point system, make applications available online, and consider ways to make the state and federal programs uniform.

Measures:

- a. Present recommendations to the Drinking Water Board in July 2007.

STATUS: *Draft rule amendments for R309-700 and 705 were presented to the Board in 2007 electronic application was made available online in April 2007. An interactive electronic application was made available online in March 2008, whereby the applicant could submit the application electronically and the information could be downloaded into the Division data base directly without someone entering the data by hand.*

- b. Revise recommendations per Board's request and present final amended rules to the Board at or prior to the October 12, 2007 Drinking Water Board meeting.

STATUS: *Revised draft rule amendments were presented to and adopted by the Board on July 11, 2008. The two rules are nearly identical, with the principle exceptions being differences specified and required by federal and state laws and regulations.*

- c. Publish amended rules with Division of Administrative Rules and complete rule making process at January 11, 2008 Board meeting.

STATUS: *Amended Rules R309-700 and 705 were filed with DAR on October 13, 2008. Both Rules will be presented to the Board on January 14, 2009 for adoption.*

- d. Modify internal SRF Program requirements and policies by March 1, 2008.

STATUS: *Both Rules will be presented to the Board on January 14, 2009.*

4. The Rules Section and the Field Services Section will implement a water system recognition program.

STATUS: *Kim and Patti talked things over concerning this. A decision would need to be made on how nominations are made and what criteria would qualify them. Steve, in Patti's section, would need to perform a query in the database for those systems qualifying for recognition. This item was postponed to the 2009 goals and reassigned to the Director for implementation.*

Measures:

- a. A DDW team will be established to research the type of awards and recognitions that have been presented in the past. This task will be completed by October 31, 2007.

- b. The Team will establish the types of awards and recognitions to be presented by November 30, 2007.

- c. Criteria for the awards and recognitions will be established by January 31, 2008.

- d. The team will present a proposal for a water system recognition program by February 28, 2008.
 - e. An implementation strategy and schedule will be established by April 1, 2008.
5. The Administrative Services Section will conduct a customer satisfaction survey.

Measures:

- a. Identify different kinds of surveys (web? mailings? other?) and determine which would reach our customers most effectively; interact with Department office as needed regarding feasibility of any web-based surveys by July 31, 2007.
- b. Identify areas of interactions with customers that need measurement. (Handling of phone calls? Accessibility of information? Courtesy? Others? Section-specific?) by August 31, 2007.
- c. Develop survey questions that will provide useful and accurate measurements of customer satisfaction in specific program areas (possibly with the assistance of the Office of Planning and Public Affairs) by October 31, 2007.
- d. Implement the survey by December 1, 2007.
- e. Evaluate/measure initial results by February 28, 2008.
- f. Propose possible changes in business practices, as needed, to address customer feedback. (Possibly in conjunction with Division retreat 2008.)

STATUS: *We successfully conducted the survey, and had approximately 100 responses to the survey. We are presently working on improvements related to comments received from our customers.*

6. The Division Director will make the weekly and monthly reports available to the Board, LHD, AWWA, and the RWAU with the appropriate links to webpage.

Measures:

By June 1, 2007, a group e-mail address will be developed for use by the Director in transmitting weekly and monthly reports.

STATUS: *This task was done for Board members.*

- b. By July 1, 2007, reports will be posted on the Division's web page.

STATUS: *This was not done.*

- c. By October 1, 2007, the Division will send a survey to its partners with the purpose of assessing the value of receiving the e-mails.

STATUS: *The Board finds the information helpful.*

- d. January 1, 2008, the Division will evaluate the results of the survey and evaluate the desirability of continuing the process.

STATUS: *This was not done.*

- 7. The Division's management team will evaluate the feasibility of producing a "Things we do" newsletter.

Measures:

- a. By July 31, 2007, the Division's management team will evaluate the feasibility of sending periodic newsletters to our customers reporting on the things we are doing, and make a decision on whether to proceed. The management team will also decide the format, periodicity, audience and its relationship with the OpenLine newsletter.

STATUS: *We did not pursue the newsletter, but a "Things We Do" page was included in the 2008 "Open Line" newsletter.*

- 8. The Field Services Section will publish the Annual newsletter on Listserve.

STATUS: *I spoke with Rich P. and he said the capability has been set established. Rich has been working with Brandon Smart on this project and is waiting on Brandon to finish setting it up. (This is just a comment from YY. I have doubts on how many people use Listserve. We can say that we evaluated how many people use the Listserve service before we decide whether to proceed with this. The OpenLine Newsletter has been such a success. How about a special edition of OpenLine (once a year as an annual report) instead of creating something new on Listserve?)*

Measures:

- a. Meet and gather an electronic version by December 31, 2007.
- b. Gather e-mail addresses to send to interested parties by March 31, 2008
- c. Finalize newsletter on Listserve by April 31, 2008.

III. STATE-BASED REGULATION OF ENVIRONMENTAL PROGRAMS

Drinking Water

9. The Rules Section will evaluate EPA's Groundwater Rule and formulate an implementation plan.

STATUS: *This is a continuing effort with many Division staff involved. The rule will touch on five existing Division programs and all are active on the implementation team. Rule impacts are being explored, solutions discussed and training planned.*

Measures:

- a. Rules Section Staff will identify the elements of the rule by July 31, 2007.
 - b. By October 31, 2007, the Rules staff will develop a plan and time schedule for the following activities: i) rule writing, review and adoption, ii) Sanitary Survey enhancements, iii) SDWIS tracking schema, iv) DDW and LHD surveyor training and v) public water system training.
 - c. The Division will implement the provisions of the plan and time schedule developed under item B above.
10. The Engineering Section will develop and adopt revisions to the Disinfection Rule and create companion guidance documents for ultra-violet, ozone, chlorine dioxide, chloramines and chlorination.

STATUS: *This is a continuing effort. The development of the Disinfection Rule has been delayed due to loss of key engineering staff in recent years. This goal is now included in the 2009 PPA. At this time, the rule draft is being evaluated internally. Our goal is to have the draft rule ready for external review in February 2009, and the initiate rule making will be at the May 2009 Board meeting.*

Measures:

- a. Complete first draft for internal review by April 1, 2007.
 - b. Send draft out and receive comments from water systems by June 30, 2007.
 - c. Complete final draft by August 30, 2007.
 - d. Present the rule to Drinking Water Board at the November meeting.
 - e. Provide training to water systems at various OpCert trainings, RWAU conferences and AWWA conferences.
11. The Rules Section will direct the development of a team to work with institutional water

system owners (UDOT, LDS, BSA, etc.) to enhance technical assistance and compliance.

STATUS: *This is an on-going effort, many groups have been identified and Division staff have been assigned . Most of the “Not Approved” systems have been addressed.*

Measures:

- a. Identify sets of systems with "institutional" ownership by July 31, 2007.
 - b. For each institutional owner, assemble a team of DDW staff to coordinate compliance activities by August 31, 2007.
 - c. For institutional owners with a system or systems on the Worst 25 list, negotiate and issue bilateral compliance agreements with deadlines and stipulated penalties by September 31, 2007.
 - d. For institutional owners with a system or systems with a "Not Approved" rating, negotiate and issue bilateral compliance agreements with deadlines by November 30, 2007.
12. The Rules Section will improve technical assistance on rules.

STATUS: *Training has been provided, templates developed and assistance given. More training and technical assistance is being planned for the next rule milestones and new rule requirements.*

Measures:

- a. SWTR and DBP rule manager will develop training materials to assist water systems to understand the various rule requirements by August 31, 2007.
 - b. By September 15, 2007, the Rules Section will schedule training to assist water systems on Schedules 3 & 4 to complete and submit their IDSE monitoring plans and systems on Schedules 1 & 2 to complete their IDSE reports.
 - c. By November 30, 2007, send each water system with a possible 2007 monitoring violation a courtesy letter to remind them to either take the appropriate sample or to send the appropriate data to the Division prior to logging an official violation.
 - d. By April 30, 2008, send each water system a copy of their monitoring schedule and Improvement Priority report.
13. The Engineering Section will develop a tracking scheme for rule exceptions to be used by personnel performing sanitary surveys.

STATUS: *This is on-going. A draft tracking system that is a stand alone version has been completed. The next steps are to populate the tracking system with the exceptions previously issued and to integrate the draft tracking system to become a part o DRU database.*

Measures:

- a. Meet and discuss Rule Exceptions and frame work for development within DRU by July 31, 2007.
- b. Develop a rule exception piece in the database by December 31, 2007.
- c. Incorporate the database with sanitary surveys by May 31, 2008.

IV. PARTNERSHIP WITH FEDERAL, STATE, LOCAL AND TRIBAL GOVERNMENTS

Drinking Water

14. The Administrative Services Section will work with LHDs, district engineers, county planners, and others to develop guidance relating to Source Protection and Capacity issues.

Measures:

- a. Planning: Identify at least three local planning groups for training/presentations source protection and capacity development issues by July 31, 2007.
- b. Implementation: Make at least three presentations and/or host poster sessions on source protection and capacity development issues, and financial assistance to local planning groups by March 31, 2008.
- c. Contact Utah League of Cities and Towns and see if information can be added to their planner resources page on drinking water issues by July 31, 2007.
- d. Work with DEQ's Office of Planning and Budget staff to add general information on source protection issues to the Critical Lands Planning Toolkit through the Utah Quality Growth Commission (Governors Office of Planning and Budget).
- e. Attend monthly Regional Planning Program meetings.
- f. Evaluate success of effort, and whether other opportunities exist by April 1, 2008.

STATUS: *All measures were successfully accomplished, and we continue to pursue this effort.*

15. The Administrative Services Section will advise and solicit help from other DEQ Divisions

on protecting Sensitive SPP.

Measures:

- a. Verify that all data security instructions are included in the metadata associated with each facility location and protection zone data layer complete by July 31, 2007.
- b. Contact GIS representatives and branch or section managers in other DEQ divisions to determine if it is required or would be beneficial for them to include public water sources and protection zones in their environmental evaluations. Complete by August 31, 2007.
- c. Instruct GIS personnel how to connect to DDW data through the DEQ network. Also instruct them regarding appropriate security measures. Complete by September 30, 2007.

STATUS: *These measures were generally accomplished, and we continue to pursue this effort.*

- 16. The Engineering Section will enable web access for partners (LHD's, DE's and water systems) to key data.

STATUS: *The DE's have access to the DDW databases. However, we found out that the speed of their connection is limited by the IT capacity of each local health department, since they are housed in the local health department's offices. The DEQ IT also has reservation about moving forward with this goal because of IT security and firewall concerns. This goal needs to be reevaluated. (Is this goal eliminated in the FY 2009 PPA?)*

Measures:

- a. Meet & discuss web access for our "partners" by June 30, 2007.
- b. Meet with Bill Crowther and Tad Wimmer by July 31, 2007 for the purpose of coordinating implementation.
- c. Enable access of key data to appropriate partners by December 31, 2007.

V. EMPLOYEES

Drinking Water

- 17. The Division Director will ensure that staff will become more proficient in program issues and cross-train one another.

Measures:

- a. By July 31, 2007, each manager will present a list to the Director of cross training needs within their respective sections.
- b. By August 31, 2007, a training calendar will be set with 45 minute training topics scheduled with the monthly staff meetings.
- c. By September 30, 2007, additional training classes will be scheduled to accommodate training needs that are longer than 45 minutes to accomplish.

The Engineering Section facilitated numerous trainings, and the entire Division was invited to each of these trainings. The training topics included new treatment technologies, well drilling regulations, well drilling methods, and virus inactivation, etc.

18. The Division's management team will ensure that staff enters data consistently to SDWIS, SARA and DRU. Establish standards for entering data and managing legal entities, water systems and facilities. Develop documentation and appropriate training.

Measures:

- a. Determine the data entry requirements for data entered to SDWIS, SARA and DRU, complete by July 31, 2007
- b. Meet with representatives from each section to determine the data entry standards that are already in use. This will include historically established standards and standards in the Division database policy document. Determine if additional standards are necessary. Include issues such as naming conventions and seasonality/activity status, complete by September 31, 2007
- c. Develop documentation and/or training, complete by December 31, 2007

STATUS: *Staff met throughout the Fall of 2008 to determine what data entry standards were necessary, and conducted several training sessions for the Division in December 2007. EPA has provided webinar training sessions through the fall of 2008 as well. The Engineering Staff received training in data entry to various DDW databases. Updating data in various databases is now a necessary step of the plan review process.*

The Division Director will check plan approval letters to ensure proper SDWIS data entry has occurred.

19. The Division Director will work with staff on ensuring that back-up capability exists for strategic functions (travel, SDWIS/SARA, DRU, Web, administrative approvals, and on-going rule implementation, etc.)

STATUS: *The Division Director will continue to stress this with Section Managers and*

progress is being made.

Measures:

- a. By July 1, 2007, the management team will decide the areas where back-up capability is needed and place appropriate assignments in performance plans.
- b. By mid June 2008, an evaluation will be made via individual performance reviews on the success of implementation.

VI. ENHANCE POLICYMAKERS' UNDERSTANDING OF ENVIROMENTAL ISSUES

20. The Division Director will work with other water agencies to develop a public education campaign to be ready for Drinking Water Week in May 2008.

STATUS: *The efforts of AWWA RWAU and water utilities were excellent, resulting in a successful water week.*

Measures:

- a. Meet with AWWA, RWAU and the Water Coalition by December 31, 2007 to evaluate past water week observance and plan for the 2008 Water Week.
 - b. By February 29, 2008, send a letter to community water utilities inviting their participation in Water Week 2008.
21. The Division Director will collaborate with Board members in support of joint goals.

STATUS: *The Division and the Drinking Water Board have started two significant initiatives as a result of the collaboration. One of these initiatives resulted in the funding of a contract to do work with local government to encourage responsible growth. The other initiative involves proper design of water system expansions to ensure that water utilities can meet the needs associated with growth.*

Measures:

- a. Starting with the Drinking Water Board meeting on May 11, 2007, the Board meeting and in all subsequent Board meetings, the Division Director will mention those Division issues that are or may be of interest to the Board. If appropriate, the Director will solicit input and support from the Board on joint goals.
22. The Division Director will invite local legislators to DW Board activities.

STATUS: *This has been done with limited success. Two Senators, in separate Board meetings did attend a meeting, and the Director did receive two phone calls asking*

about the outcome of the Board's action.

Measures:

- a. For the July 11, 2007 Board meeting and subsequent meeting thereafter, the Executive Secretary will prepare and send form letters to appropriate legislators regarding the Board's meetings.
23. The Division Director will work on securing a sustainable budget for the Division.

STATUS: *The Director did discuss options, but they were rejected. Later in the year the national economy took a down turn worsening the situation.*

Measures:

- a. By July 31, 2007, the Division Director will determine the viability of using the Department of Work Force Services funding to aid in providing operator certification training and backflow technician training.
- b. By September 30, 2007, the Division Director will commence working cooperatively work with the Water Coalition on funding sources for DDW.

VII. INFORMATION TECHNOLOGY

24. The Administrative Services Section will Plan for and implement the Department electronic document management system.

Measures:

- a. Scan backlog of water system documents (system files, source protection files) into Documentum by December 31, 2007.
- b. Implement use of Documentum to generate correspondence and documents by September 1, 2007.
- c. Begin planning for second phase of Documentum (establishing work flows) by September 30, 2007. (This is dependent on Department contractor and other divisions' implementation).
- d. Implement Phase II within the Division by April 30, 2008.

STATUS: *eDocs has been and continues to be successfully implemented in DDW.*

25. The Rules Section will complete, maintain and enhance the SDWIS/SARA database.

Measures:

- a. During the period between July 1, 2007 and October 1, 2007 all of the DDW's staff will become conversant with the SDWIS/SARA databases.
- b. Appropriate Division staff will begin outlining the steps necessary to move to SWRI, during the July through September 2007 timeframe and then work cooperatively with Tad Wimmer and Bob Shipman to ensure the ability of IT services to support the migration.
- c. Through September 30, 2007, the Rules Section will identify implementation glitches in SDWIS and SARA databases and identify corrective action to be forwarded to IT services for correction.

STATUS: *All measures are able to be accomplished are. The timeframe to move to SDWIS web release 2 has been moved to April 2009.*

CORE ACTIVITIES

Division of Drinking Water - FY 08 Core Activities		
Category	Activity	Responsibility
Philosophy, Culture	Customer service oriented	All
	Implementation of DEQ Operating principles	All
	Actively seek feedback from our customers	All
	Maintain good communication and partnerships with all of DDW's customers	All
	Effective inter-section communication	All
	Effective inter-divisional communication	All
Staff	Ensure staff are technically trained to accomplish mission	All
	Reward and recognize employees for excellent work	All
	Serve on national and state committees	All
	Employee job ownership/employee empowerment	All
	Secretaries forward calls to the proper staff member or agency	All
IT, Gov e-business	Internet homepage maintenance	All
	SDWIS data reporting	Rules
	Automate water treatment plant report transmission	Rules
	DAD development and maintenance	Engineering

	Implement geographic information system (GIS) applications	Administrative Services
	SDWIS database development and maintenance	Rules
Assistance Training	Staff assistance to Drinking Water Board	All
	Technical assistance to water operators	All
	General partnering (targeted training, cooperative follow-up, planning)	All
	Educate locally elected officials and their staff	All
	Water quality problems, technical assistance	All
	Perform feasibility studies	Engineering
	Support for Permanent Community Impact Board	Construction
	Technical assistance to water treatment plants	All
	Support local water quality alliances (also assigned to Special Services)	Engineering
	State water plan coordination	Engineering
	Training on capacity development and it's issues to consultants, district engineers, others	Engineering
	Ensure Drinking Water Board members have sufficient training to make policy decisions	All
Field Work	Sanitary survey scheduling	Field Services
	Sanitary survey performance and PDA troubleshooting, water system response	All
	Water treatment plant inspections	Engineering
	Construction inspections	Engineering
	Develop and obtain additional useful spatial data	All
	Special studies on water treatment techniques	Engineering
	Geologic evaluation of sources	Administrative Services
Regulatory	Write, implement and revise rules as needed	All
	New Source operating permits	All
	All sections have enforcement comp. With individual Rules	All
	Enforcement (AOs, BCAs, AG Referrals, Administrative Hearings, and Administrative Penalties, etc.)	All

Properly follow-up on assignments made at All
the Division's quarterly CAP meetings

Unified Enforcement Oversight System All

EPA annual compliance reporting Rules

Improvement Priority System Rules

Utah will implement appropriate prevention Rules
and enforcement actions on SNC and Not-
approved systems

Public Notice Rules

Consumer Confidence Reports Rules

Report every three years on assistance to Engineering
significant non-compliers from capacity
development program

Quarterly SNC list annotated and back to Rules
EPA within 30 days

Copy EPA with enforcement action All

Monitoring and MCL Compliance tracking Rules
and reporting

Plan reviews / Operating Permits Engineering

Grout Witnesses Engineering

Surface Water Treatment Rule tracking and Engineering /
reporting (also GWUDISW) Rules

Source protection program Administrative
Services

Capacity review for new systems Engineering

Assure that sampling and reporting is being Rules
done in a professional, timely and truthful
manner.

When EPA proposes a rule, we will study All
the impact, prepare appropriate comments,
and encourage the affected PWSs to
comment. Finalize each rule by developing
an appropriate State Rule, and implement.

Certification

Backflow Technician Certification Field Services
Operator Certification Field Services

Financial Assistance

Financial assistance programs Construction
Capacity assessments for financial aid Engineering
/Construction
Annual rates and needs survey Engineering

Misc

Emergency Response / System Field Services/
Security/Project Funding Engineering

Laboratory Coordination	Field Services
Annual report	Director
Support services (Purchasing, contracting, grants, travel, budget preparation, budget/expenditure tracking, and financial reporting, cash receipts, fee schedule)	Administrative Services
Support Board investigations on: Conservation; secondary systems; system security; master planning requirements; State SRF to mutual systems; 1/16 % sales tax issue.	Construction/ Engineering
Respond to GRAMA requests	All