

**PERFORMANCE PARTNERSHIP AGREEMENT (PPA) FY10**  
**between**  
**THE UTAH DIVISION OF DRINKING WATER (STATE)**  
**and**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION VIII**  
**FY 2010 GOALS - END OF YEAR REPORT**

Preamble: This is a performance partnership agreement between the Utah 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.

**STATUS:** *Utah is performing adequately.*

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 violations and submit SDWIS “return to compliance” information where applicable.

The State will employ internal management practices to verify complete data reporting. EPA and State will jointly discuss the 2008 EPA Data Verification audit. State will proceed with Goal Number 13 in an ordered fashion to resolve data quality errors. 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.

**STATUS:** *Utah's database maintenance has improved significantly.*

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 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.

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.

**STATUS:** *Current with rule adoption. Utah needs to enter failure to filter violations for a few systems.*

TCR/SWTR: State will provide updating information to EPA during the quarterly CAP meetings regarding the status of compliance of subpart H water systems.

**STATUS:** *Utah has improved documenting any deviations of the rules.*

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.

EPA will continue to encourage the State to ensure that violation letters are sent to PWSs for each violation incurred. This 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.

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. EPA will continue to participate in quarterly CAP calls with the State to discuss SNCs, and will obtain the State's plans for addressing all systems that are SNCs but not yet Exceptions, or that are already Exceptions. If the State does not plan to address SNCs prior to them becoming Exceptions or

existing Exceptions, or if the State does not meet its previous commitments to take enforcement actions, then EPA will take federal enforcement action. EPA may also issue NOV's for cases in which PWSs become Exceptions immediately due to late data entry or which would have been SNCs/Exceptions if all violations had been uploaded to SDWIS-Fed.

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. OECA is working with the Regions to develop a new Enforcement Response Policy (ERP) that will define significant non-compliers by system-based approach versus the current rule-based approach. It is expected that the new approach will run concurrently with the old approach during FY10, however, it is possible that the full implementation of the new ERP may occur later in the second half of FY10, and negotiations may have to take this into consideration. The State will escalate enforcement actions, for those systems that continue to violate, including pursuing penalties and AG referrals. 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.

The State will work on meeting its GIPRA Goals as stated below:

Sub-objective 2.1.1 - Percent of population served by Community Water Systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. - 90%

**STATUS:** *Achieved 93.3%.*

SP-1 - Percent of Community Water Systems that meet all health-based standards through approaches that include effective treatment and source water protection. - 90%

**STATUS:** *Achieved 90.9%.*

SP-2 - Percent of "person months" (i.e., all persons served by Community Water Systems times 12 months) during which Community Water Systems provide drinking water that meet all applicable health-based drinking water standards.- 95%

**STATUS:** *Achieved 98.9%.*

SDW-1a - Percent of Community Water Systems that have undergone a Sanitary Survey within the past three years (five years for outstanding performers) as required under the Interim Enhanced and Long Term 1 Surface Water Treatment rules. – 95%

**STATUS:** *Utah has greatly improved a timely response to the SNC list. More improvement needs to be done in certain rule areas.*

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 2009. 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. EPA will evaluate UEOS Question 6 to determine whether the State addressed each SNC prior to Exception status. EPA will conduct an on-site audit in FY 10 and focus on complete and accurate uploading of violations to SDWIS-Fed.

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. If EPA conducts a UEOS evaluation of targeted State sanitary surveys in FY10, EPA will request copies of up to 25 sanitary survey reports. The State commits to entering all sanitary surveys and technical assistance visits into SDWIS or provide EPA a list of sanitary surveys by PWS and source) completed in FY 10.

The State will upload all SNC related enforcement actions and applicable return to compliance (RTC) codes into SDWIS-Fed quarterly, and particularly by June 30, 2010, for all such actions completed by that date. This will enable EPA to complete its required reporting to EPA HQ by October 1, 2010. EPA encourages the State to develop management tools to ensure that enforcement actions are uploaded to SDWIS-Fed. This could include evaluating the success of the employee's responsible for this data entry during their performance appraisal.

EPA will also exert its influence with EPA HQ to encourage an automated RTC functionality into SDWIS-State and/or SDWIS-FED. Both the State and EPA 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 recognizes that entering enforcement actions involves: a) the recognition of an RTC condition, a less than intuitive task given the myriad number of samples received by State and the expansive number of applicable EPA rules, b) identifying all violations that qualify to be RTC'd, c) determining the violation ID numbers for each of those violations, and d) entering the appropriate enforcement action codes and attaching them to the previously identified violation ID's. EPA acknowledges that when State undertakes this overhead type of activity, State is serving the database so that the database can serve EPA. EPA recognizes that SDWIS-State, as it now exists without the RTC module, is not a tool to help State fulfill its requirement to report a

major portion of its enforcement actions. Consequently, EPA commits to exert its influence in promoting an RTC module for SDWIS-State and SDWIS-FED. Further, EPA commits to report its efforts in promoting the RTC functionality in SDWIS-State and SDWIS-FED to State at the end of the FY.

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.

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 6-month period. As with all EPA press releases, the content will be non-negotiable unless it's a clerical error and this agreement is only applicable to the 2010 PPA. EPA is aware the State may issue a response press release containing clarifying and correcting comments regarding EPA's press release if State see a need for it.

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.

***STATUS: Utah has greatly improved a timely response to the survey list. More improvement needs to be done in certain rule areas.***

Sanitary Surveys: The State shall submit to the Region 8 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 2009 as required by 40 CFR 142.15(a)(5) by February 15, 2010.

***STATUS: We reported in a timely fashion.***

Drinking Water Source Protection: The State is committed to reporting the status of source protection implementation in Utah to EPA annually. The State is participating and assisting in discussions regarding the feasibility of using SDWIS-State in the future to accomplish this reporting, and will continue to support that effort.

***STATUS: Utah is currently using SDWIS State for source protection reporting.***

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF DRINKING WATER**

**FY 2010 GOALS - END OF YEAR REPORT**

**I. ENVIRONMENT**

1. The Rules Section will work with the Administrative Services Section and the Engineering Section to finalize the Entry Point/Source Common Aquifer Sampling Policy and establish procedures approved by all managers in the Division for determining common aquifer status.

**STATUS:**     *Completed*

**Measures:**

- a. By August 31, 2009, finalize the current draft policy on entry point/source common aquifer sampling. Rules, Engineering, and Administrative Services sections must approve the required criteria for sources to be considered from a common aquifer.
  - b. By September 30, 2009, establish an implementation process for phasing in the common aquifer portion of this policy. Communicate new policies and implementation timeframe to water systems.
  - c. On-going beginning December 1, 2009, review existing groupings for validity formally acknowledge or revoke any groupings based on adopted policy.
2. The Rules Section will continue to enact the implementation plan for EPA's Groundwater Rule.

**STATUS:**     *Completed*

**Measures:**

- a. By July 31, 2009, the Rules Section staff will re-examine the implementation plan and time schedule for the following activities:
  - i) rule writing, review and adoption,
  - ii) Sanitary Survey enhancements,
  - iii) SDWIS tracking schema,
  - iv) UDDW and LHD surveyor training, and
  - v) public water system training.

- b. Rules section will continue to implement the plan and time schedule under item a. above.
  - c. By September 30, 2009, the Rules Section staff will send written notification to water systems of the pending compliance date of December 2009.
3. The Engineering Section will develop and adopt revisions to the Disinfection Rule.

**STATUS:** *Complete internal review by April 30, 2010. Solicit external review in the month of May. Initiate rulemaking in the month of July. Keep goal.*

**Measures:**

- a. By July 15, 2009, the Engineering staff will receive individual assignment for various disinfectants for conducting technical review of the existing disinfection rule and the draft revision of the existing rule.
- b. By November 30, 2009, complete the draft Disinfection Rule revisions for internal review.
- c. By December 31, 2009, send the revised draft to solicit comments from water systems and external experts.
- d. By February 28, 2010, complete the final draft. Present the conceptual Disinfectant Rule revisions to Drinking Water Board as an informational item in the following Board meeting.
- e. If the Drinking Water Board finds the rule revisions conceptually acceptable, seek approval of the Drinking Water Board to proceed with rule making.
- f. When applicable, provide training regarding the Disinfection Rule revisions to water systems and consultants at various water operator trainings, RWAU conferences, and AWWA conferences.

**II. CUSTOMER SERVICE**

4. The Rules Section will a team to work with institutional water system owners (UDOT, LDS, BSA, etc.) to enhance technical assistance, compliance assistance, enforcement response and facilitation of multiple system contacts.

**STATUS:** *Completed*

**Measures:**

- a. By July 31, 2009, evaluate and update if necessary the existing goals and objectives of the team contact concept.

- b. By August 31, 2009, identify any remaining institutional owners (BLM, USFS, Boy Scouts, LDS Church etc) assemble a team of UDDW staff to coordinate compliance activities.
  - c. By July 31, 2009, the Division management team will review the established Institutional Teams and confirm or assign new team leaders. Team leader assignments for future (new) teams will be will be made by the Division management team within 20 days of formation of the new team.
  - d. By August 15, 2009, Section managers will confirm or assign team members representing their Section to each Institutional Team. Team member assignments for future (new) teams will be will be made by the respective Section Managers within 20 days of formation of the new team.
  - e. By September 30, 2009, Institutional team leaders will contact their assigned Institutional groups and arrange, or offer to schedule a meeting with each institutional owner or group of owners for training sessions tailored to the specific needs of each group of systems and involve appropriate representation by UDDW staff.
5. The Engineering Section and Construction Assistance Section will develop a tracking scheme for rule exceptions to be used by personnel performing sanitary surveys.

**STATUS:** *Have completed Parts A and B. Part C will be completed by the end of May. Part D will be moved to the core activity.*

**Measures:**

- a. By December 31, 2009, determine extent of previous research made toward collecting historical exceptions.
  - b. By January 31, 2010, develop database structure to track new exceptions and import historical exceptions.
  - c. By March 31, 2010, import historical exceptions into database structure.
  - d. By April 30, 2010, training staff on data entry for new exceptions.
6. The Rules and Construction Assistance Section will investigate the feasibility of placing a UDDW “report” (non-sensitive information) request function on the Division’s web site which would enable the public to request a standard report from a pre-determined list of standard reports to be e-mailed to the requestor by the end of the next business day. The scheme needs to ensure a next business day response in spite of telecommuting, vacations, travel or illness of employees.

**STATUS:** *Incorporate this goal in an external partner access goal.*



**Measures:**

- a. By October 1, 2009, staff will obtain a list of all standard reports that would be helpful and useful to the public.
- b. By November 1, 2009, staff will create a list of first responders to each standard report and two backup people.
- c. By February 1, 2010, staff will investigate the best approach to allow these requests to be made and responded to.
- d. By May 1, 2010, if an appropriate solution is found, staff will create the link on the Division's website to enable the public to make the request.

**III. STATE-BASED REGULATION OF ENVIRONMENTAL PROGRAMS**

7. The Construction Assistance Section will implement changes to the State Revolving Loan Fund (SRF) Program.

**STATUS:** *Present non-substantive changes to the Drinking Water Board to meet current standards at the May 19, 2010 Drinking Water Board meeting.*

**Measures:**

- a. Present revised draft recommended changes to draft rule R309-800 (currently R309-352), Capacity Development Program, to the Drinking Water Board on November 18, 2009. The revision shall take into account Board discussion and recommendations given during the January 14, 2009 Board Meeting.
  - b. Finalize rule changes for R309-800 and present to the Drinking Water Board at its March 2010 Board Meeting for implementation.
8. The Division of Drinking Water will investigate how to increase the number of people authorized to witness the well sealing process for public drinking water wells by revising R309-515-6(5)(b) Grouting Inspection During Well Construction.

**STATUS:** *This goal is completed.*

**Measures:**

- a. Prepare a draft revision to the applicable rule by August 31, 2009.
- b. Invite critique of the draft revision from Division staff, appropriate staff of the Division of Water Rights, Utah Groundwater Association, the Consulting Engineers Council, Utah City Engineers Association, Rural Water Association of Utah, and Utah Geological Association by September 30, 2009.

- c. Revise the draft rule based on the feedbacks received by October 31, 2009. The revised draft will be provided to those interested and placed upon the next available Drinking Water Board agenda for its consideration.
  - d. After acceptance as a proposed rule by the DWB, Division staff will initiate the appropriate rulemaking process within one month following the Drinking Water Board's action.
9. The Field Services Section will work with our partners to provide technical assistance to public water systems for their cross connection control programs.

**STATUS:** *Goal completed*

**Measures:**

- a. By September 30, 2009 staff will meet with DDW partners and division staff to discuss plans for program development.
- b. By December 15, 2009, staff will develop training modules to be place on the training calendar for systems needing a cross connection control program.

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

10. The Rules and Field Services Sections will work to improve communications with Local Health Departments and establish other areas of contacts as needed.

**STATUS:** *Work is on-going. Initial intent of this goal will be completed by July 1, 2010. Rework goal for address maintenance and keep it on-going.*

**Measures:**

- a. By September 30, 2009, establish UDDW/LHD working group to address issue.
  - b. By November 30, 2009, identify critical and/or common areas of communication between the Division and LHDs.
  - c. By January 31, 2010, establish or re-establish an acceptable point of contact and method of contact for each area of communication (i.e.,: e-mail list, or call down list).
  - d. By March 31, 2010, implement the working group recommendations.
11. The Rules and Field Services Sections will explore improvements to the ESS and sanitary survey process.

**STATUS:** *Goal was completed in November 2009. Modify the goal to include Measure D, and do a review of the sanitary survey questions. Incorporate different disinfection technologies.*

**Measures:**

- a. By November 2009, a new policy will be written that requires DDW staff to notify the LHDs and DEs of any changes or significant findings during the survey.
  - b. By March 2010, provide training on Fluoridation in the Salt Lake and Davis county areas. This could be a separate training not related to sanitary survey training and may be provided by an outside source.
  - c. By September 2009, an updated policy will be written requiring proper notification of a Sanitary Survey that not only notifies the Water System but the LHD and DEs.
  - d. Once the change to SDWIS 2.2 is completed, DDW staff will determine if more information can be pulled across from SDWIS into ESS.
  - e. DDW staff will work with IT and the ESS contractor to resolve the major issues with ESS 4.1 and the 2009 question set by December 2009. Changes will be incorporated in the 2010 question set.
  - f. By December 2009, DDW will provide a list of items required to be sent back to DDW:
    - 1) Cover Letter,
    - 2) IPS,
    - 3) Inventory,
    - 4) Operator Certification report,
    - 5) Deficiency Report, and
    - 6) Source and Storage Calculation Sheet.
  - g. Investigate if there are PDA's that are easier to read in sunlight, and investigate the costs for replacement. A decision will be made on how to proceed by June 30, 2010.
12. The Rules Section will investigate and promote the enablement of web access of key data for our partners (LHDs, DEs, RWAU and water systems to enable all to see: monitoring schedules, IPS reports, Inventory reports and Operator CEUs).

**STATUS:** *Continue until this goal is completed.*

**Measures:**

- a. By July 1, 2009, UDDW staff will meet with IT staff to determine the best means of making drinking water data available to LHDs, DEs, RWAU and water systems.
  - b. By August 1, 2009, UDDW staff will select the best method for making data accessible and implement a plan for doing so.
  - c. By December 1, 2009, UDDW partners will be able to access the drinking water data.
13. The Rules Section will work cooperatively with EPA Region VIII on the development of an “Implementation and Data Quality Improvement Plan” which prioritizes issues affecting public health.

**STATUS:** *Carry this goal over, and define what EPA needs.*

**Measures:**

- a. By September 1, 2009, staff will involve EPA Region VIII on the use of EPA’s electronic data verification tool to obtain a list of the potential data errors.
- b. By October 31, staff will identify the various types of data quality errors and place them into logical groups.
- c. During the month of November 2009, staff will place the logical group of data quality errors into priority order and receive comments from EPA Region VIII regarding the priority order.
- d. As resources allow, during the remainder of the federal fiscal year, staff will work on changing processes, activities and/or procedures to achieve the greatest improvement of data quality.
- e. By September 30, 2010, staff will prepare a report on activities undertaken during the year. The report will also contain an explanation of the State’s selection rationale for both the logical groups selected and those not selected.

**V. EMPLOYEES**

14. All Sections will cooperatively work with staff on developing and maintaining a “Policy and Procedures” folder in eDocs for use by staff. The folder will be logically organized and will address common routinely dealt with issues. The folder will contain helpful charts, checklists and standard letter formats and paragraphs.

**STATUS:** *Goal is in progress.*

**Measures:**

- a. By September 30, 2009, identify critical division procedures/processes for inclusion. Make assignments to staff to develop flow charts illustrating these processes.
- b. By December 31, 2009, complete flow charts that document critical division processes.
- c. By January 30, 2010, include flow charts in eDocs.

**VI. ENHANCE POLICYMAKERS' UNDERSTANDING OF ENVIRONMENTAL ISSUES**

15. The Division Director will work on securing a sustainable budget for the Division.

**STATUS:** *Ken pursued this goal as far as possible.*

**Measures**

- a. By September 30, 2009 the Division Director will work with the new Executive Director of the Department to explore funding issues and potential fee options available to the Division.
- b. The Division Director will follow the direction given by the Executive Director.

**VII. INFORMATION TECHNOLOGY**

16. The Rules Section will work to improve the reporting of analytical data to UDDW by enabling the electronic transfer of laboratory analytical data to the Division.

**STATUS:** *Great strides have been made. Continue to facilitate.*

**Measures:**

- a. By July 1, 2009, IT and UDDW representatives will participate in a planning meeting to outline the steps necessary to install, and implement Lab to State as a public-facing website. The goal of the meeting will be to identify and plan for critical steps in the process, produce a working timeline, coordinate efforts with certified laboratories, and to identify the stakeholders and plan for their involvement in the process.
- b. Weekly meetings will be held to coordinate on-going implementation efforts.

- c. By July 1, 2009, documentation will be provided to the certified laboratories in the state detailing the structure of the XML or csv files and the Lab to State process.
  - d. When Lab to State is successfully deployed, training on its use will be provided to the laboratories and the rule managers by September 1, 2009.
17. The Construction Assistance Section will develop process and protocols to facilitate electronically additions to the SRF Needs list. Consider making a second SRF Needs List from sanitary surveys, MCL violations, and other staff activities and determine if/when it should be consolidated with the project priority list or main Needs List.

**STATUS:** Measures A and C have been completed. Modify measures B and D in next years goals. Revise the Project Priority List.

**Measures:**

- a. By October 31, 2009, determine extent of previous research and prior coordination made toward developing a database structure to hold the SRF Needs List.
  - b. By February 28, 2010, develop the main module to database structure to hold the SRF Needs List.
  - c. By April 30, 2010, develop individual modules for each component of the SRF Needs database.
  - d. By June 30, 2010, train staff on data entry.
18. The Engineering and Construction Assistance Sections will develop a mechanism to incorporate fire flow requirements into drinking water system capacity requirements and plan reviews.

**STATUS:** *Completed by May 31, 2010*

**Measures:**

- a. By October 31, 2009, the Division staff will have a scoping meeting with the State Fire Marshal to discuss our goal.
- b. Identify the State and local fire marshal's jurisdiction. Obtain a list or lists of fire authorities and their jurisdictions.
- c. Consult with competent fire authorities (in concert with drinking water providers) to identify critical and essential parameters for establishing capacity requirements.

- d. By November 30, 2009, DDW staff will conduct an internal meeting to discuss results and appropriate modifications to the measures and this goal.
  - e. If the discussion with the state fire marshal doesn't modify our course of action, we proceed with the following:
    - i. By January 31, 2010, send mass mailing to all systems asking who their local fire authority is and contact information. Make an online form available to collect the information of fire flow requirements.
    - ii. By March 31, 2010, send the mailing to the identified local fire authorities asking who is in their jurisdiction and what fire flow requirements are for each system in their jurisdiction.
    - iii. By May 31, 2010, create fields in the database to include information of fire authority, contact information, and, if applicable, fire suppression requirements.
    - iv. Populate fields in the database. This will be an on-going effort by Division staff.
19. The Division's management team will ensure that staff enters data consistently into SDWIS, SARA, eDOCS, and DRU. Establish standards for entering data and managing legal entities, water systems, and facilities. Develop documentation and appropriate training.

**STATUS:** *This goal is rolled into other goals.*

**Measures:**

- a. By September 30, 2009 appropriate staff will evaluate each database, including:
    - a) SDWIS (Rules Section, Engineering Section, Construction Assistance Section and Administrative Services Section), b) SARA (Rules Section), c) DRU (Engineering Section, Construction Assistance Section and Administrative Services Section) and eDOCS (Administrative Services Section, Rules Section, Engineering Section and Construction Assistance Section) and prepare instructions on data entry.
  - b. Beginning with the Division Staff meeting held in November 2009 training on data entry will be given.
20. The Field Services Section will evaluate the Montana Water Center's Operator Basics CD to see if the information on the CD is accurate and of value to place on the Division's website.

**STATUS:** *The goal is completed.*

**Measures:**

- a. By July 31, 2009, staff will investigate the accuracy of the CD and determine if it is a useful tool to help operators prepare for the exams and obtain CEU's by placing it on the Division's website.
- b. By August 31, 2009, staff will make recommendations to Management whether or not the CD should be placed on the Division's website.



CORE ACTIVITIES:

**Division of Drinking Water - FY 09 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 UDDW's customers	All
	Effective inter-section communication	All
	Effective inter-divisional communication	All
	The Division Director will invite local legislators to DW Board activities.	Division Director
	The Division Director will collaborate with Board members in support of joint goals	Division Director
	Actively protect public health through assurance of water system compliance, see division mission statement	All
	Employee job ownership/employee empowerment	All
Staff	Ensure staff are technically trained to accomplish mission	All
	Reward and recognize employees for excellent work	All
	managers have an open door policy (and keep staff issues and conversations private)	
	Serve on national and state committees	All
	Secretaries forward calls to the proper staff member or agency and staff will inform secretaries of schedule and whereabouts	All
	Ensure cross-training and back-up capability where appropriate	All
IT, Gov e-business	Internet website including in-use forms kept current, maintained and improved	Const Assist / All
	SDWIS data reporting	Rules
	Automate water treatment plant report transmission	Rules
	Implement geographic information system (GIS) applications, including support for outside partners and other DEQ Divisions	Admin Serv
	Maintain and enhance the divisions databases: SDWIS/SARA/DRU	Rules / All

	Plan for and implement the Department electron document management system	Admin Serv / All
Assistance and Training	Staff assistance to Drinking Water Board	Division Director / All
	Technical assistance to water operators	All
	General partnering (targeted training, cooperation, follow-up, & planning)	All
	Educate locally elected officials and their staff	All
	Water quality problems, technical assistance	All
	Perform Capacity development functions	Const Assist / All
	Provide support for the Permanent Community Impact Board	Const Assist
	Technical assistance to water treatment plants	Division Director / All
	Support local water quality alliances	Division Director / All
	Support water planning activities in cooperation with other agencies and local government and technical assistance partners, regarding source protection and system viability issues	All
	Provide training on physical facility capacity and it's issues for consultants, district engineers, others	Const Assist / Engineering
	Ensure Drinking Water Board members have sufficient training to make policy decisions	Division Director / All
Field Work	Sanitary survey scheduling with consideration for expertise rotation and geographic grouping. Perform Sanitary Surveys. Respond to water systems	Field Services
	Water treatment plant inspections	Engineering / Const Assist
	Construction inspections	Engineering / Const Assist
	Develop and obtain additional useful spatial data	All

	Special studies on water treatment technologies	Engineering
	Geologic evaluation of sources	Admin Serv

	Emergency Response / System Security/Project Funding	Field Services/ Engineering / Const Assist
	Assist water systems with developing and maintaining Cross Connection control programs	Field Services
Regulatory	Write, implement and revise rules as needed	All
	Plan review and operating permits	Engineering / Const Assist
	Enforcement & compliance by each section on its rules	All
	Enforcement (AOs, BCAs, AG Referrals, Administrative Hearings, Administrative Penalties, etc.)	Rules / All
	Properly follow-up on assignments made at the Division's quarterly CAP meetings	Rules / All
	Unified Enforcement Oversight System	Rules
	EPA quarterly reporting	Rules
	Improvement Priority System	Rules
	Implement appropriate prevention and enforcement actions on SNC and Not-approved systems	Rules
	Public Notice	Rules
	Consumer Confidence Reports	Rules
	Report every three years on assistance to significant non-compliers for the capacity development program	Const Assist
	Quarterly SNC list annotated and back to EPA within 30 days	Rules
	Copy EPA with enforcement action	Rules
	Monitoring and MCL Compliance tracking and reporting	Rules
	Grout Witnesses	Engineering / Constr Assist

	Surface Water Treatment Rule tracking and reporting (also GWUDISW)	Rules / Engineering / Field Services
	Source protection program	Admin Serv
	Capacity development review for new systems	Const Assist
	Assure that sampling and reporting is being done in a professional, timely and truthful manner.	Rules
	When EPA proposes a rule, we will study the impact, prepare appropriate comments, and encourage the affected PWSs to comment. Finalize each rule by developing an appropriate State Rule, and implement.	All
<b>Certification</b>	Backflow Technician Certification	Field Services
	Operator Certification	Field Services
<b>Financial Assistance</b>	Financial assistance programs	Const Assist
	Capacity assessments for financial assistance	Const Assist
	Annual rate and needs surveys	Const Assist
<b>Misc</b>	Laboratory Coordination	Field Services
	Support services (Purchasing, contracting, grants, travel, budget preparation budget/expenditure tracking, and financial reporting, cash receipts, fee schedule)	Admin Serv
	Support Board investigations on: Conservation; secondary systems; system security; master planning requirements; State SRF to mutual systems; 1/16 % sales tax issue.	Const Assist / Engineering / Field Services
	Respond to GRAMA requests	All
	Actively seek financial assistance to enable the division to pursue its mission	All