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# FY08 Colorado Performance Partnership Agreement -- End of Year Assessment

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An Assessment of Environmental  
Accomplishment and Challenges for the  
Period - October 1, 2007 through September  
30, 2008

January 2009

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## 1.0 Introduction to the End of Year Assessment --

The Colorado Performance Partnership Agreement (CEPPA) is an agreed-to plan between the Colorado Department of Public Health and Environment and Region 8 of the Environmental Protection Agency to address environmental issues and problems in Colorado. Thus, it reflects commitments made by both agencies to environmental management.

The CEPPA document:

- 1) Defines the roles of the Colorado Department of Public Health and Environment (CDPHE) and Region VIII EPA;
- 2) Identifies the overall priorities for environmental protection in Colorado; and,
- 3) Describes what the state and federal environmental program efforts will be to protect air, water and the land.

The purpose of this report is to describe the program accomplishments for the grant period from October 1, 2007 through September 30, 2008. The Colorado Performance Partnership Agreement (CEPPA) FY2008 includes work plans (air, water, waste and cross-media) and were completed with funding, in part, from the Performance Partnership Grant. as a part of the comprehensive environmental program plan for Colorado.

This report also is intended to fulfill the requirement of the PPG program grant awarded to the state by EPA for an end-of-year assessment. This was conducted during the period of December 2008-January 2009 by the CDPHE Environmental Programs. Areas assessed include all program activities and accomplishments for all media. This report will be used, along with other guidance, as part of the ongoing PPA update process.

This report is intended to provide an overview of the progress of environmental management in addressing air, water and waste issues in Colorado.

This initial assessment was completed by program staff in the Health Department and to some degree by EPA Region 8. This assessment is part of the continuing cycle of interagency planning and implementation to address the major environmental concerns in Colorado.



## 2.0 Strategic Directions, Priorities, and Values

### 2.8 Innovations, Indicators and Data Integration Work Plan

Innovations			
Short Term Goals	Objectives	Timeline	Performance Measures
Continue to take a lead role in supporting, testing, and implementing innovations	Invest in innovation and capacity building by continuing to create a work environment that supports innovation including, mainstream innovation into agency processes, and identifying and carrying out strategic resource investments and disinvestments to support and measure innovative work	Ongoing	Develop, begin implementing, and measure the EMS permit project (grant funded)
			Project completed and grant (PI978051-01) closed as of 07/25/07. Final report submitted to EPA 7/01/07.
			Implement ERP, including the SCORE project, into core programs as appropriate (i.e., small CAFOs)
			A state-only control regulation (groundwater protection) requirement for CAFOs conducted using an ERP approach starting in February 2007 to the present (in the enforcement phase for non-compliance).
Encourage greater compliance and protection of public health and environment by promoting the regulated community conduct a greater degree of self-policing	Identify programs and areas where self-audit principles can be incorporated, such as: EMS Permit Project, SCORE and ERP, COMPASS Projects, and Environmental Leadership Program	Ongoing	Integrate the Inspection Efficiency Cross-Media Project into core programs as appropriate
			Develop, discuss with EPA and implement into core programs a Cross-Media Evaluations in Settlement Agreement Policy
			Number of self-audit submittals provided to CDPHE
			Number of submittals qualifying for immunity or privilege
			Number resolved in a timely manner
			Measure relationship of audits to long-term facility compliance

Innovations			
Short Term Goals	Objectives	Timeline	Performance Measures
Development and implementation of EMS permit pilot project	Completed: staff training, regulation, criteria and policy, assistance to facilities in developing EMSs, flexibility negotiated, continual improvement goals, measurements and baselines completed for 5 partner companies, multiple stakeholder meetings, audit program completed	Ongoing	Completed
	Assist partners with ongoing development and review of EMSs		Continue to assist the 5 partner companies further improve and develop EMSs with continual improvement goals Working through the Environmental Leadership Program to encourage continued implementation and improvements to EMS goals and to mentor two of the project partners into the leadership program.
	Continue partnerships with NGOs, local governments, industry, and EPA		Convene at least 3 stakeholder meetings and compile comments during the final phase of project Completed
	Conduct EMS audits midway through project	2006	EMS and compliance audits at each facility either by CDPHE, contractor or someone external to facility Completed by a contractor
	Develop report by December 31, 2006	Dec 31, 06	Develop assessment of program with stakeholders Submit to legislature and provide to all stakeholders final report Completed. Report submitted to the legislature January 2007.
Continue to develop and implement new and innovative approaches to achieve environmental protection and solve environmental problems	Continue to implement the Environmental Problem Solving program	Ongoing	See Chapter 3
Implement Wastewater Treatment Facility Environmental Results Program	Validate self certification accuracy	Annually	Develop, begin implementing, and measure the EMS permit project (grant funded)

Innovations			
Short Term Goals	Objectives	Timeline	Performance Measures
	Maintain inspection-based compliance rate for majors.	Annually	Implement ERP, including the SCORE project, into core programs as appropriate (i.e., small CAFOs)
	Improve percentage of significant violations resolved at minor facilities.	Annually	Integrate the Inspection Efficiency Cross-Media Project into core programs as appropriate
Develop, implement and measure Stormwater Excellence Program	Under State 1 of the Pilot Program, provide guidance to the regulatory community that will assist them in achieving full compliance with State and local stormwater requirements for the construction industry.		Develop, discuss with EPA and implement into core programs a Cross-Media Evaluations in Settlement Agreement Policy
	Under Stage 2 of the Pilot Program, implement the program, followed by further evaluation and a determination of whether to continue with full implementation of the current program or modify the program.		Number of self-audit submittals provided to CDPHE Number of submittals qualifying for immunity or privilege Number resolved in a timely manner Measure relationship of audits to long-term facility compliance
Incorporate stewardship practices into environmental programs	Catalogue past, current and future pollution prevention and stewardship practices for each division	Ongoing	NUMBER OF SUBMITTALS QUALIFYING FOR IMMUNITY OR PRIVILEGE
	Identify additional practices and incorporate	Ongoing	NUMBER RESOLVED IN A TIMELY MANNER
Incorporate stewardship practices into CDPHE policies	Catalogue past, current and future pollution prevention and sustainability practices incorporated into CDPHE policies	Ongoing	MEASURE RELATIONSHIP OF AUDITS TO LONG-TERM FACILITY COMPLIANCE
	Review environmental policies and identify sustainability opportunities and incentives	Ongoing	See Chapters 3 and 4
	Develop, implement, and measure Stormwater Excellence Program	FY2006	Stage 1, 2, 3

Innovations			
Short Term Goals	Objectives	Timeline	Performance Measures
Provide businesses with a framework to implement sustainable practices through EMSs	Annually identify key business sectors with input from each divisions, TRI, EJ, etc. Set up partnerships with selected sectors and internal stakeholders	Ongoing	See Chapters 3 and 4
Develop, across the environmental programs, a standardized approach to data systems development, data collection, data integration, and data transfer to internal and external customers.	Develop and implement the project commitments as outlined in each EPA grant workplan.	Ongoing	Extensive performance measures are outlined in the workplans associated with each EPA data grant.



### 3.0 Compliance Assurance<sup>1</sup> and Environmental Stewardship

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<sup>1</sup> "Compliance assurance" encompasses compliance assistance, inspections, monitoring, reporting, record keeping, and enforcement elements of CDPHE programs.

### 3.8 Compliance Assurance and Environmental Stewardship Work Plan

Goal: Environmental Leadership Program			
Subgoals	Objectives	Timeline	Performance Measurements
Implement and enhance CDPHE's recognition of, rewards for and incentives program for environmental leadership in the protection of air, water, and land	Coordinate efforts between CDPHE and EPA to increase the efficiency and effectiveness of ELP, PT and other state leadership programs	On-going	Successful implementation of MOU - Completed, April 24, 2002
			Number of facilities utilizing MOU - 13
			Hours saved for facilities in application efforts 200
-- Improve, develop and implement CDPHE's Environmental Leadership Program	Implement and regularly review MOA or ELP policy with the environmental divisions	On-going	Environmental and resource benefits from implementation of MOU easier for companies to report and utilized and compile data for annual reporting (ongoing).
	Develop and implement agreed upon incentives for environmental leaders		Environmental and resource benefits from implementation of incentives 9 individual incentives for leaders and 10 group incentives
	Internal ELP Advisory Group provides regular guidance and assistance to the ELP in developing, implementing, and modifying the program	On-going	Number of hours of participation 8
			Advise and recommendations provided input for forms and applicants with compliance issues (ongoing)
			Increase in referrals to program –30-
	Utilize PPAB Committee plus other ELP members as external advisory board provides regular guidance and assistance to the ELP in developing, implementing, and modifying the program	On-going	Number of hours of participation 5
			Advise and recommendations provided – 3 referrals for the Bronze Level and input on the Platinum Level
-- Expand membership in both the Bronze, Silver and Gold levels of ELP, assist with the development of a Partnership Tier and Stewardship	Implement and regularly review ELP program criteria, including criteria for EMS, program entry, review processes, continual improvement, and auditing	On-going	Use of criteria guidance – Last updated June 2008

Tier for ELP	Provide ELP presentations to businesses, industry trade groups and organizations		Number of presentations 163 presentations and/or visits
	Develop additional Tiers (Partner and Platinum levels) and begin to implement, as resources allow	FY2007	See Chapter 4
-- Implement incentives program for ELP members	Review, approve or disapprove, and/or meet with the company on facility-specific incentives within 30 days of submittal of incentive request	On-going	Number of incentives received and provided – 10
			Hours saved for facility – n/a
			Environmental and resource benefits from incentives 4
	Implement awarded incentives in a timely, consistent manner		Implementation of incentives –10 all updated and completed
	Track and ensure divisions comply with incentives, including reduced inspections		Adequate implementation of incentives – all updated and current
Incorporate sustainability and leadership practices into current regulations -- Review environmental regulations and laws and identify stewardship opportunities and incentives, including incorporating P2, EMSs, and leadership principles	Identify possibilities for air, waste and water regulations, including cross media livestock programs, supporting renewable energy and energy efficiency through receiving credits for SIPs, and others	On-going	Number of sustainability and P2 regulatory provisions included in environmental regulations – 1
			Number of entities utilizing provisions (if possible) 4
			Environmental and resource benefits – in process
-- Implement a program for Sustainability staff to accompany various CDPHE divisional inspectors on inspections	Draft, negotiate and present proposals for FY2007	FY2007	On-going, 5 joint inspection completed this year.
		On-going	Measurements not available at this time.

<ul style="list-style-type: none"> <li>-- The program should be designed to open lines of communication/sharing of ideas between the Sustainability Program and compliance staff</li> </ul>	Send response letter back to facility within 30 days of each P2 "shadow inspection"	On-going	Timely responses were submitted to facility.
Incorporate stewardship practices into environmental programs and policies <ul style="list-style-type: none"> <li>-- Catalogue past, current and future pollution prevention and sustainability practices for each division and CDPHE</li> </ul>	Update a compendium of pollution prevention and sustainability activities conducted by each of the environmental divisions as a part of their regular responsibilities	On-going	On-going
			Measurements not available at this time.
			Information not available.
<ul style="list-style-type: none"> <li>-- Review environmental policies and identify and incorporate additional sustainability opportunities, incentives, and practices</li> </ul>	Identify and implement new practices and environmental and cost benefits from these practices	On-going	Information not available.
			Information not available.
Provide businesses with a framework to implement sustainable practices through EMSs <ul style="list-style-type: none"> <li>-- Annually identify key business sectors with input from each divisions, TRI, EJ, etc.</li> <li>-- Set up partnerships with selected sectors and internal stakeholders</li> </ul>	Identify sector(s) and work with partners	On-going	Cross Media Compliance Assistance Team currently working on identifying partners
	Develop EMS tools for sector(s)		Not available at this time.
	Provide training to sector if appropriate		
	Transition sector members to ELP Program		
	Track and measure results		Information not available at this time.
Develop, implement and integrate internal EMS into CDPHE programs and processes <ul style="list-style-type: none"> <li>-- Develop, implement, and measure economic and environmental benefits of CDPHE internal EMS</li> <li>-- Implement FY2006 objectives and targets</li> </ul>	Develop necessary policies	On-going	New printer purchasing policy developed.
	Train personnel on internal EMS and Greening Government		193 internal employees trained and 62 external state employees trained
	Development of aspect and impacts		Aspects and impacts identified
	Update and measure baseline for CDPHE		Baseline developed
	Development of objectives and targets		Development of objectives and targets completed through Greening Government Executive Order D 0011 07 and D 0012 07

	Implement energy efficiency projects	<p>Lighting retrofit at state lab – saves 5,657 kWh and \$365/yr. Equates to 4 ton reduction of CO<sub>2</sub>.</p> <p>CFL lightbulb challenge – Gave away 570 CFL's to employees. Average savings of 52W/bulb x 570 bulbs x 4 hrs/day x 365 days = 43,274 kWh saved. This equates to a reduction of approximately 31 tons of CO<sub>2</sub> using EPA's estimate of 1.43 pounds/kWh.</p> <p>Added new controls to steam boilers at state laboratory. Saves 1,531 therms per month. At \$0.57/therm this equates to \$10,400/yr savings.</p> <p>Re-sealed state laboratory roof with Top Guard 4000 sealant in white. Has a reflectivity index of 104.13. Will save energy to cool building in the summer.</p> <p>Purchased 7 Ford Escape Hybrids and 6 Toyota Prius for fleet. They replaced 13 conventional SUV's and sedans. This saved approximately 2,561 gallons of gasoline. It also reduced CO<sub>2</sub> emissions by 25.6 tons.</p> <p>CDPHE is entering into a Performance Contract with Long Energy to reduce energy consumption at the state laboratory.</p>
	Implement water conservation projects	<p>Track E-Star accomplishments for CDPHE</p> <p>Additional xeriscaping projects at the lab saved 260,000 gallons of water and \$1,040 in water costs.</p>
	Implement recycling program	<p>CDPHE recycled approximately 272,000 pounds of glass, aluminum, office paper, plastic, cardboard, newspaper, magazines, batteries and electronic equipment.</p> <p>Initiated employee/cafeteria composting program at facility in September of 2008. Will report on tons diverted next year.</p> <p>Donated or reused over 200 pounds of office supplies valued at \$700.</p>

	Implement paper conservation projects		Went from 3133 cases of paper in FY '07 to 2724 cases of paper in FY '08. This is a 409 case reduction and saved approximately \$12,270 dollars.
	Implement Human Resources Division projects		Measure environmental, resource and cost benefits Continue new employee orientation on Greening Government activities 4 times per year, reaching approximately 100 employees.
Environmental Problem Solving: Pharmaceuticals in the Environment (PIE)	Assist with the problem identification and outreach efforts surrounding PIE	FY2007	Number of people reached via outreach efforts 100 Number of facilities participating in PIE reduction efforts 4
<b>Goal: Implement Environmental Problem Solving Approach</b>			
Short Term Goals	Objectives	Timeline	Performance Measures
Continue to develop and implement new approaches to achieve environmental protection and solve environmental problems	Assess data to determine both the significance and scope of the problems affecting the well-being of Colorado's citizens	On-going	Assessment completed and valid use of data Determine data gaps Exploring nexus between environmental divisions and Office of Health Disparities. Consideration given to developing a workgroup to discuss issues and improve communication.
	Identify environmental trends and respond with innovative ideas	On-going	Trends identified
	Improve and enhance CDPHE's delivery of environmental services with cost effective and innovative approaches that encourage environmentally sustainable economic growth	On-going	Projects may include oil and gas, livestock operations, migrant farm workers, crematoriums (mercury and silver emission), meth labs, depending upon assessment and resource availability ERP approach used in 2007 for CAFO groundwater requirements.
Environmental Problem Solving: Mercury Project	Assist with problem identification and outreach efforts	On-going	Number of people reached via outreach efforts
Reduction of mercury entering the environment through pollution prevention (PBT project)	Mercury Manager will lead the dental mercury team along with health division and establish partnership with Colorado Dental Assn. to reach dentists	FY 2007	Partnership with CDA
			Number of dental offices reached and that install mercury capture systems in Pueblo
			Amount of mercury captured in Pueblo

	Continue to implement pilot project plan in Pueblo to significantly reduce mercury releases from dental offices through recognition and coordination with local POTWs		Development of recognition program and number of facilities recognized
	Promote medical mercury reduction by encouraging hospitals to join Hospitals for Healthy Environment and/or to implement mercury reduction projects	On-going	Number of hospitals joining H2E
			Amount of mercury removed from environment
	Continue mercury switch removal initiative working with scrap metal handlers Partner with scrap handling association and pilot a project in front range with handling operations	FY 2007	Number of switches removed at scrap handlers
			Amount of mercury removed from environment
			Change in stack test results at CF&I
			Number of facilities participating
	Expand and coordinate thermostat and thermometer exchange programs with locals in partnership with environmental organization	FY 2007	Number of thermometers and thermostats replaced
			Amount of mercury removed from environment
	Promote pollution prevention projects with Colorado crematoria to reduce mercury releases to the environment	FY 2007	Partnership with Colorado-based funeral associations; amount of mercury removed from the environment
<b>Goal: Cross Media Enforcement Team</b>			
<b>Short Term Goals</b>	<b>Objectives</b>	<b>Timeline</b>	<b>Performance Measures</b>
Implement cross media enforcement team	Continue to identify policies, programs and efforts that can be coordinated on cross media basis	On-going	Revised department's SEP Policy and the department's Policy on Settling Administrative and/or Civil Penalties Against Eligible Governmental Entities, 5/8/08.
	Continue to implement CDPHE's strategic goal of achieving a sustainable Colorado through performance-based programs	On-going	On-going, working on capturing the environmental and compliance benefits through efforts in an outcomes database.
	Ensure implementation of goals and objectives stated below if they fall within this team's purview, including increasing environmental benefits from enforcement and turning violators into leaders	On-going	Compliance with policies, goals and objectives is regular and consistent.
			On-going - updating goals and objectives

Integrate cross media inspections into programs	Integrate the Inspection Efficiency Cross-Media Project into core programs as appropriate – air and waste will continue and expand current program	On-going	Information not available at this time.
			Environmental and compliance benefits of inspections unavailable at this time
Protect public health and the environment through program improvements – compliance support in air, water and waste	Provide support and training to inspectors on a cross media basis (policy interpretation, settlement documents, assist in negotiation of settlements, enforcement database)	On-going	On-going, trainings provided as needed
	The State will maintain a high level of expertise to ensure that high quality inspections consistent with national guidance and statutory requirements are being conducted	On-going	Number of staff reached unavailable at this time
Support public health and the environment by promoting compliance of regulated facilities and conducting enforcement actions related to all sources for air, water and waste -- Ensure enforcement actions are timely and appropriate in accordance with the MOUs	Follow appropriate enforcement response agreement (see Attachment A MOA Between CDPHE and Region VIII for Administration of the RCRA Hazardous Waste Program, Attachment B EPA's Policy on the Clean Air Act Compliance Monitoring Strategy, and Attachment C Water)	On-going	Inspections met state and federal standards through random sampling
-- Require and document actions necessary to assure return to compliance consistent with the policies and MOUs in Attachments A, B, and C	Issue warning letters, compliance advisories, notices of violation, and compliance orders, request commission hearings and enter into settlement agreements, as appropriate to ensure a return to compliance	On-going	Actions were taken in a timely manner, in accordance with the attached MOAs and MOUs and policies
			On-going, working to capture the environmental and resource benefits in an outcomes database
			Timely return to compliance through each action
-- Document long-term maintenance of compliance after formal enforcement	Assess and determine whether to develop a reporting system to measure the long-term effectiveness of formal enforcement actions	On-going	Additional metrics are provided in the chapters below
-- Take formal enforcement actions, such as administrative orders, judicial referrals and referrals to EPA as	Include compliance schedules, assessment of penalties and escalation of enforcement action as appropriate for the violations and consistent	On-going	Ongoing
			On-going, working to capture the environmental and resource benefits in an outcomes database
			Timely return to compliance through each action

appropriate and within the time frames established in MOAs and policies, in Attachments A, B, and C	with MOUs and policies, in Attachments A, B, and C		Number of each action tracked by divisions
			Amount of penalties assessed and collected tracked by environmental divisions
-- Enforcement follow-up and other activities will be conducted in accordance with the MOA between the State and USEPA/Region 8 to assure return to compliance	Include use of compliance schedules, stipulated penalties, follow-up inspections and compliance assistance and/or escalation of enforcement response as appropriate consistent with MOUs and policies, in Attachments A, B, and C	On-going	On-going, working to capture the environmental and resource benefits in an outcomes database
			Stipulated penalties assessed and collected tracked by environmental divisions
			Measurement of repeat violations tracked by environmental divisions
-- Region 8 and CDPHE place a high priority on addressing enforcement "watch lists" which include unaddressed significant non-compliers	Review watch list	On-going	Facilities on watch-list with identified compliance issues are reviewed by environmental divisions
	Discuss unaddressed facilities with EPA		Return to compliance information not available
	Coordinate with the Region on a plan to address them (which may include work-sharing)		On-going, working on recording environmental benefits of return to compliance in outcomes database
Support protection of public health by responding to complaints	Respond to all complaints, including for federal and state-only programs, in a timely manner	On-going	Complaints responded to according to policies
	Work with the parties as appropriate to address the root cause of the complaint		Environmental benefits of addressing root cause of complaint cannot be measured at this time.
Protect public health and the environment through compliance inspections	Conduct the number and type of inspections as agreed upon between CDPHE and Region 8 pursuant to the air, water and waste program plans below in Chapters 5, 6, and 7 and considering the cross media programs that result in inspections	On-going	Number of inspections conducted in accordance with the agreement with EPA
			Environmental and compliance benefits of inspections cannot be measured at this time
Support public health and the environment through testing and evaluation of sources	Conduct and require testing and evaluation of sources pursuant to the air, water and waste program plans below in an appropriate and timely manner	On-going	Number of tests and evaluations observed and conducted recorded by environmental divisions
			Environmental and compliance benefits from tests and evaluations cannot be measured at this time

Promote pollution prevention and EMSs as an alternative in inspection and enforcement activities	Identify, promote, and include, where appropriate, specific pollution prevention and EMS options for the facility to use to achieve compliance to meet the goal of turning violators into leaders	On-going	Number of settlements with pollution prevention and EMSs as the compliance method cannot be measured at this time
			Environmental benefits of P2 and EMS compliance elements cannot be measured at this time
<p>Continued coordination between EPA and State to assure timely, joint review and uniform oversight of enforcement program</p> <p>-- Oversight reviews will be scheduled to provide feedback as part of the CEPPA Mid Year and End of Year reviews</p> <p>-- Make oversight an effective tool for improvement and minimize the redundancy of reports and reporting requirements</p> <p>--</p>	EPA conduct mid and end of year enforcement file reviews to review state's timeliness of enforcement actions and appropriate assessment and collection of penalties	Nov 2005	Met UEOS goals and objectives
	Quarterly or semi-annual coordination meetings to discuss the compliance and enforcement program	Quarterly	Met UEOS goals and objectives
	CDPHE shall make available the penalty calculations, including economic benefit calculations where appropriate, and a description of any SEPs, for CDPHE enforcement actions during the fiscal year	On-going	Met UEOS goals and objectives
	CDPHE divisions will revisit the Civil Penalty Policies to determine if the policy needs to be updated or if changes in the application of the policy need to take place	On-going	Met UEOS goals and objectives
Efficiently utilize administrative resources in ensuring small businesses and communities return to compliance using a cross-media approach.	Refer small businesses and communities to compliance assistance providers for cross-media assistance as an enforcement tool, as appropriate.	On-going	<p>Number entities that received compliance assistance from referrals is detailed in Chapter 5</p> <p>Number referred entities returned to compliance within 90 days by compliance assistance is detailed below</p> <p>Environmental and compliance benefits cannot be measured at this time</p>
	Return referrals to enforcement if compliance assistance cannot ensure compliance within designated timeframes.	On-going	Entities referred back to enforcement are handled by the environmental divisions
Develop, incorporate and implement Environmental Results Program into	Incorporate and implement ERP SCORE project into program	FY2007	Number of facilities submitting audits not available at this time

core programs and measure outcomes	<ul style="list-style-type: none"> <li>-- Develop and propose regulatory program to Hazardous Waste Commission</li> <li>-- Upon approval, implement program, including providing compliance assistance</li> </ul>		Environmental and Compliance benefits and staff resources saved are not available at this time
	Develop and implement ERP for small CAFOs in conjunction with Minnesota DEP	FY2007	Number of facilities submitting audits (self-certifications) - 204
	<ul style="list-style-type: none"> <li>-- Develop and propose regulatory program to Water Quality Control Commission</li> <li>-- Upon approval, implement program, including providing compliance assistance</li> </ul>		Compliance benefits – 100% response rate from CAFOs. Seepage standard will be in place for all lagoons used by CAFOs to store/treat process wastewater.
			Environmental benefits – greater protection of groundwater
			Staff resources saved – it would take five years to complete on-site inspections at every known Colorado CAFO. This project was managed by one staff starting in February 2007.
Encourage greater compliance with laws and rules protecting public health and the environment by promoting a greater degree of self-policing in the regulated community	Implement the Self-Audit Law consistent with Colorado's statute and the above stated agreement	On-going	Number of self-audit submittals provided to CDPHE - 6
			Number of submittals qualifying for immunity or privilege - 2
			Number resolved in a timely manner - 3
			Measure whether there is any relationship of audits to long-term facility compliance – n/a
			Environmental benefits – n/a
Garner greatest environmental benefit from enforcement resources through supplemental environmental projects program.	Promote SEPs in every settlement agreement above \$10,000 and those below \$10,000, as appropriate, including donations to communities, in accordance with the Department-wide SEP policy and CDPHE's Municipality Policy	On-going	Compliance benefits – n/a
			High percentage of settlement agreements in which SEPs are offered and then accepted – exact number unavailable at this time
			Environmental and natural resource benefits are detailed in each SEP Completion Report, available on request.
			Cost savings to facilities – information detailed in SEP Completion Report

	Solicit & research for other SEP ideas	On-going	On-going, idea inventory developed and maintained. 70 SEP ideas available
	Identify and include, where appropriate, specific options for pollution prevention and EMS SEPs	On-going	21 out of 33 completed SEPs contained P2 elements..
			Environmental benefits from pollution prevention SEPs is detailed in each SEP Completion Report
	Promote SEPs that address environmental issues, problems and concerns, including environmental justice	On-going	Environmental and natural resource benefits is detailed in each SEP Completion Report. Quantifiable benefits detailed below.
			Cost savings to facilities – unavailable at this time
			Promoted SEPs in EJ areas of Commerce City, Weld County and Pueblo.
			Qualitative measures for community benefits may be included in the SEP Completion Report

	Quantify environmental benefits of each SEP	On-going	<p>Outputs: 6,848 people reached via environmentally beneficial outreach and education efforts.</p> <p>50,422 people reached via environmentally beneficial advertisements</p> <p>3 children identified with elevated blood lead levels.</p> <p><u>Outcomes:</u> 38.4 Dth/day of natural gas conserved</p> <p>1546 yd<sup>3</sup> of glass aluminum, tin and newspaper recycled.</p> <p>22,630 lbs of #1 and #2 plastics recycled.</p> <p>614,051 gallons of water/yr conserved</p> <p>322,586 kWh/yr conserved through efficiency measures</p> <p>15,256 kWh/yr produced through renewable energy</p> <p>1,200 galls diesel fuel conserved per year</p> <p>12,000 lbs of batteries recycled</p> <p>1,200 CFLs recycled</p> <p>200 tons/year VOC reduced</p> <p>486 tons/year CO reduced</p> <p>6.25 tons/yr PM2.5 reduced</p> <p>24.5 tons/yr PM10 reduced</p> <p>32 tons NOx/yr reduced</p> <p>137 tons CH4/yr reduced</p>
Ensure that the unique concerns for municipalities are considered in CDPHE's enforcement activities.	<p>Recognize that municipalities are in a unique position in enforcement proceedings regarding the payment of cash penalties</p> <p>Provide municipalities the opportunity to determine whether it has the ability to pay the penalty through EPA's Munipay Model</p>	On-going	<p>SEP website being revised</p> <p>WQCD offers Municipalities the EPA's Munipay Model</p>

	If the entity has the ability to pay the penalty, CDPHE will provide it the opportunity to mitigate the entire penalty (civil and economic benefit) with a beneficial or supplemental environmental project through the Department-wide Municipality Policy.	On-going	Several municipalities were offered the ability to use CDPHE's Municipality Policy
Continue to take a lead role in supporting, testing, and implementing innovations.	Invest in innovation and capacity building by continuing to create a work environment that supports innovation including, mainstream innovation into agency processes, and identifying and carrying out strategic resource investments and disinvestments to support and measure innovative work.	On-going	Develop, begin implementing, and measure the EMS permit project (grant funded). Completed.
			Implement ERP, including the SCORE project, into core programs as appropriate (i.e., small CAFOs). CAFO ERP completed.
			Develop, discuss with EPA and implement into core programs, if appropriate, a Cross-Media Evaluations in Settlement Agreements Policy.
Cross Media Compliance Assistance Team			
Short Term Goals	Objectives	Timeline	Performance Measures
Cross Media Compliance Assistance Team shall develop a work plan, with goals, objectives and strategies, to achieve greater environmental and compliance benefits through compliance assistance	Coordinate compliance assistance efforts between programs, including sharing information, data, and referring facilities	On-going	Number of facilities provided cross media compliance assistance by media Animal Feeding Operations (air,, water, pests) - 20
	Develop and implement a sector strategy, including Compass type projects (see below)	On-going	See COMPASS below
	Cross train compliance assistance providers	On-going	Number of individuals trained and hours of training Environmental Agriculture Program – 4.5 trained, 10 hours
	Continue to hold regular workgroup meetings to discuss cross media opportunities	On-going	Outcomes and outputs of meetings – post achievements on Department's website
Efficiently utilize administrative resources in ensuring small businesses and communities return to compliance using a cross-media approach.	Refer small businesses and communities to compliance assistance program for cross-media assistance as an enforcement tool.	On-going	See Compliance & Enforcement above
	Return referrals to enforcement if compliance assistance cannot ensure compliance within designated timeframes.	On-going	See Compliance & Enforcement above

Identify and minimize where possible negative cross media transfers in compliance assurance activities.	Catalogue cross media transfers compliance assistance and inspectors are aware of from fieldwork.	FY2007 FY2008 On-going	Number of examples identified
			Estimated environmental outcomes of activities modified
			Development of Department policy to continue regular reviews
Implement sector-based compliance assistance (COMPASS) projects as appropriate.	Complete implement sector-based project for Auto Salvage industry	FY 2007	Number and percentage of facilities participating – Program 2 <sup>nd</sup> round tabled due to lack of sector interest and staff availability
			Environmental and natural resource benefits
			Compliance benefits
			Cost savings to facilities
	Complete implementation of sector-based project for Surface Coating industry	FY 2007	Number and percentage of facilities participating
			Environmental and natural resource benefits
			Compliance benefits
			Cost savings to facilities
	Complete implementation of sector-based project for Correctional Facilities	FY 2007	Number and percentage of facilities participating – Program on hold.
			Environmental and natural resource benefits
			Compliance benefits
			Cost savings to facilities
	Continue to implement sector-based project for Correctional Facilities  -- Review guidance materials and continue to improve	FY 2007	Number and percentage of facilities participating – On hold. Talks continue with new DOC "Green Team" to conduct compliance assistance outreach at more facilities.
			Environmental and natural resource benefits
			Compliance benefits

	<ul style="list-style-type: none"> <li>-- Enter into and implement MOA with other facilities</li> <li>-- Conduct on-site compliance assessment and provide cross media training</li> <li>-- Develop measurement tools for environmental and compliance outcomes</li> <li>-- Report to industry and public on website</li> </ul>		Cost savings to facilities
	Continue to develop other sector-based projects, with agreement from Region 8	FY 2007 FY2008	Number and percentage of facilities participating
			Environmental and natural resource benefits
			Compliance benefits
			Cost savings to facilities
Environmental Customer Assistance Center: Provide services to all stakeholders so that they can easily understand environmental issues; their environmental obligations; and, so that all Colorado citizens and organizations can contribute to identification and prioritization of health and environmental protection needs and solutions in Colorado in the most appropriate ways.	Serve as an initial contact for those seeking environmental information.	On-going	Measure the delivery of services and types of information requested.
	Provide services to all stakeholders so that they can easily understand environmental issues; their environmental obligations	On-going	Solicit, coordinate and follow-up with environmental divisions and others on requests for information and assistance.
			Continue to operate the Department's One Stop Environmental Permit Center.
			Communicate and follow through on requests for technical assistance and compliance assistance.
			Prepare and routinely update program contacts lists for circulation to regulated entities and the public.



## 4.0 SUSTAINABILITY DIVISION

### 4.9 Sustainability Division Work Plan

Sustainability Division Efforts (division wide efforts)			
Short Term Goals	Objectives	Timeline	Performance Measures
Participate and assist in leading CDPHE Environmental Coordinating Committee	Enabling group within CDPHE for cross media, sustainability and innovations Employee training objective	On-going	Success in various internal programs
Continue to expand, enhance and update Sustainability Division's website and resources	Maintain and review website to identify partners, projects, successes	On-going	Number of hits – 204,000 web hits for Sustainability Program web pages in FY08 Updated website – All 315 web page revisions throughout year.
	Expand the Internet library and resource center	On-going	Number of hits – see above
	Provide access to information on new products, production process techniques, technical reports, fact sheets, case studies, articles, alternative raw materials, and other materials	On-going	Enhance materials available for permit engineers and inspectors to provide to regulated entities Enhance the website library to link to greater number and variety of sustainability materials and sources 55 document additions or updates throughout year. Number of internet hits– see above
Increasing strategic and collaborative partnerships and enhance CDPHE ability to leverage resources:	Coordinate programs focused on concepts of leadership and sustainability	On-going	Number of programs aligning with CDPHE objectives Air, Land and Water Number of participants in such programs Drinking Excellence (9), Stormwater (2)
-- Participate in Colorado Environmental Partnership: leverage resources in providing education, assistance, and performance	Participate in selecting topics, find speakers, promote meetings, etc.		Number of programs aligning with CDPHE objectives Air, Land and Water Number of participants in such programs 80+

Sustainability Division Efforts (division wide efforts)			
Short Term Goals	Objectives	Timeline	Performance Measures
goals for industry, government and non-governmental organizations	Continue to work towards CEP as on-ramp for ELP		Number of programs aligning with EMSs 58 Number of participants in such programs 58
-- Collaborate with industry, not-for-profits, and governmental agencies in sustainability and energy education.	Coordinate with partners in the delivery of EERE information and the deployment of EERE technologies, including jointly applying for grants	On-going	Number of people reached 100 at DNC. Number of EERE projects Sustainability Program works with CEP, CASBA on Sustainability projects – 10
	Provide sustainability assistance and other support in partnership with CEBA, StEPP, CSBN, P3 Colorado, NEMPPA & CASBA, Alliance for Sustainable Colorado, & UCD		
	Continue partnership with OEMC, DOE, and NREL on energy related projects.		

Sustainability Division Efforts (division wide efforts)			
Short Term Goals	Objectives	Timeline	Performance Measures
<p>Participate in National, State and local efforts to promote sustainability and cross media concepts, ideas, and programs and continue and enhance partnerships with</p> <ul style="list-style-type: none"> <li>-- Federal Govt: R8, NREL, DOE, DOA, OPEI, OPPTS, OAQPS, OSWER, OECA</li> <li>-- State &amp; Local Partners: PPAB, ECOS, MSWG, DOA, GEO, CDOT, SBDC, SB National Steering Committee, Office of Economic Development, Governor's Advocate Corp, P2 Locals, State Council on Transportation &amp; Env't</li> <li>-- NGOs: Product Stewardship Institute, NPPR, Peaks-to-Prairies, Colorado Sustainable Business Network, P3 Colorado, NEMPPA, EC, TU, Sierra Club, ED, CEC, StEPP, CWA, Audubon Society</li> <li>-- Businesses &amp; Assns: CLA, CMA, CHA, Colorado Dental Assn, Colorado Auto Recyclers, Automotive Service Assn, Small Business Assn, Printers and Imaging Assn, Korean Drycleaners Assn, Colorado Fabricare Assn., National Ski Areas Association</li> <li>-- EPA Resource Conservation Challenge – serve on OSWER Steering Committee</li> </ul>	<p>Participate as Board member on Multi State Working Group (MSWG) to promote state programs that garner environmental performance</p> <p>Participate in ECOS semi-annual meetings and work groups to promote sustainability and cross media ideas, innovations, and efforts</p> <p>Partner with GEO on Greening Government Activities.</p> <p>Participate as a Board member on CEP to align efforts with CDPHE</p> <p>Participate with Council on Transp &amp; Env't to promote sustainability within CDOT</p> <p>Participate on NEPT's conference calls and meetings</p> <p>Providing advice and assistance to EPA's OSWER RCC Program</p> <p>Participate on EPA's OSWER RCC Advisory Council</p> <p>Participate on ASTSWMO Sustainability Task Force</p> <p>Participate on EPA's Innovation Action Council as appropriate</p> <p>Participate on ASHTO SEHD Advisory Council</p> <p>Participate on the City of Denver's Greenprint Advisory Council</p> <p>Participate in judging ski industry Golden Eagle Environmental Awards</p> <p>Participate on NPPR Sustainability Workgroup (co-chair), P2 Results Task Force and Data Collection Subcommittee</p> <p>Participate on Denver Democratic Convention Business Subcommittee</p> <p>Partner with the StEPP Foundation on SEPs</p>	<p>On-going</p>	<p>Resource constraints have placed involvement with MSWG on hold.</p> <p>Partnered with GEO on implementing Greening Government projects throughout the state.</p> <p>ELP Administrator is secretary to the board.</p> <p>Provided EMS training to CDOT officials</p> <p>ELP Administrator participates on regular basis. (1 time/month).</p> <p>Resource constraints have placed participation on hold.</p> <p>Resource constraints have placed participation on hold.</p> <p>Resource constraints have placed participation on hold.</p> <p>Resource constraints have placed participation on hold.</p> <p>Sustainability Program participates</p> <p>Sustainability Program participates</p> <p>Sustainability Program participates</p> <p>Sustainability Program participates</p> <p>6 StEPP projects completed – outcomes detailed in Chapter 3</p>

Sustainability Division Efforts (division wide efforts)			
Short Term Goals	Objectives	Timeline	Performance Measures
Continue to evaluate and demonstrate effectiveness and environmental outcomes from activities	Measure and track environmental benefits from each project implemented to assess the effectiveness of Sustainability Division activities, including activities performed in concert with other environmental divisions, such as SEPs	On-going	Measurement system established; Sustainability Outcomes Database designed and built; in final testing and debugging FY08.
Encourage, award, and educate on the use of sustainability practices throughout Colorado	Provide education and training to business, state and local government, and employees on sustainability practices	On-going	445 individuals reached through Greening Government and Sustainability training; 3 Sustainability Program staff participated in APCD/SBAP Greening Printing Training that reached ~20 printing businesses; 1 Sustainability Program staff participated in Green Credit Union Training that reached @ 20 board members; 1 Sustainability Program staff presented at Regulation for Airports workshop reaching about 100 airport staff; 1 Sustainability Staff member present to School of Mines Sustainability Program reaching about 20 students;  DNC Workshops – Restaurant Association, Hotel Association, Printers Association. “Going for Gold” Workshops – 3 trainings given.

Sustainability Division Efforts (division wide efforts)			
Short Term Goals	Objectives	Timeline	Performance Measures
-- Recognize sustainability related activities	Hold Annual Awards Event for sustainability and prevention champions, ELP and EPA awards (150 attendees) through partnership with CEP, EPA, and others  Judge nominations, develop awards, announce event with state-wide press release	Sept 2008	Number of attendees 200 Number of entities recognized 88 Quantity of benefits from entities recognized Offsite Recycling of liquids such as solvents, oil, etc. 255,403,441 gallons. Tons of Solid waste recycled – 1,098,477 tons Energy Reduction – 321,562,479 kWh. 11,024 Mmbtu Renewable Energy Purchased – 44,002MWh, 2,494,411MMBtus, 1,602,275 kWh (companies report in different metrics).
	Hold Spring CDPHE-wide Cherry Creek Cleanups along the creek designated for CDPHE (in conjunction with Earth Day)	April 2008	Number of participants at Spring Cherry Creek Cleanup around Earth Day (in April) – 34 participants at Clean-up, 300 + employees participated in Earth Day activities
-- Garner employee participation in environmental efforts	Hold Earth Day celebration annually in conjunction with the Fall Cherry Creek Cleanup (in conjunction with Pollution Prevention Week)	Sept. 2008	Number of participants at Fall Cherry Creek Cleanup (in September) – 10 participants
	Indicators development and measurement Electronic business Database for cross media and sustainability measures	FY2007-2008	Indicators work on-hold Under aNEIEN grant from EPA, CDPHE is working on the Sustainability Outcomes database referenced above, and a Cross Program Facility Report (CPFR) as the initial product of EcoQuery; bid specifications are in development, CPFR to be completed in FY 2009.
Develop Cross Media Data System			

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
Reduction of mercury entering the environment through pollution prevention (PBT project)	Participate in Mercury projects: switch, dental, thermostat, hospital, thermometer, crematorium	On-going	See above in Chapter 3
Development and implementation EMS permit pilot project	Participate in EMS permit pilot project	FY2007-2008	See above in Chapter 2 Completed
Agriculture Project: Promote pollution prevention and EMSs/environmental leadership within agricultural industry	Provide P2 technology / work practices ideas, EMS information, and alternative energy information, as necessary	On-going	Number in the industry provided outreach assistance - 163 Number implemented EMSs - 15 Number joining ELP - 15 Amount of natural resources conserved and environmental impacts mitigated – documented in EMS Permit Pilot project
	Serve as a liaison between agricultural sector and industry groups, EPA and CDPHE	On-going	Number of agricultural-related events attended - 75 Number of presentations provided to sector - 30 Environmental benefit/outcomes of liaison activities – new universal waste collection implemented at 1 CAFO (batteries, mercury containing lights, electronics, etc.)
	Implement chemical clean sweep – agricultural chemical roundup – if funding becomes available, including through SEPs	FY 2007	Number of chemicals collected – resources not available to implement project Number of farms/facilities contacted - 0 Number of participants in effort - 0

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
Environmental Education and Outreach Project: Promote energy and water conservation, sustainability, and other environmental issues to state employees and integrate into internal EMS	Continue to develop educational materials that include measures and steps state employees and other consumers can take to reduce energy and water usage, prevent air, water and waste pollution and promote sustainable practices; make the materials available on CO-TRAIN	On-going	193 employees reached. Seven presentations. (4 new employee trainings, 2 division presentations and one brown bag training.) 30 Sustainability Tips included in Weekly Broadcast e-mail sent to all 1,200 CDPHE employees throughout the year. 9 state employees
	Provide education and training to CDPHE and other state employees on sustainability, including air, water, energy, waste, and cost savings, through classroom and CO-TRAIN	On-going	137
Provide outreach and technical assistance on sustainability concepts to CDPHE, businesses, the regulated community, and the public	Sector-based compliance assistance projects	On-going	See above in Chapter 3
	Develop partnerships with key sectors	On-going	See above in Chapter 3
	Design, lead and/or participate in workshops, fairs, etc., to provide P2/ELP/Sustainability information to businesses and the public	On-going	Number of workshops and forums participated in – 2, CDOT Winter Conference and Energy Efficiency Workshop Number of participants - 50 Number of Evaluation Forms completed (where applicable) – None Participated in one EPA Lean and Green Assessment.
	Cross-training through shadow inspections: conduct 10 inspections annually	FY2007	Number of shadow inspections – 12 (Ag Program) 5 (Sustainability Program) Number of inspectors trained – 3.5 (Ag Program)
Implement CDPHE in-house EMS: maintain lead role in development and implementation	Coordinate efforts of EMS team, senior advisor, and management team(s)	Ongoing	2 contacts with EMS/Greening Government team and senior staff.

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
of internal EMS, including development of policies, coordination of training, coordination of aspects, objectives, and baselines development	Conduct gap analysis and improve documentation	FY2007	Documentation policy and procedures developed and implemented to ISO standard
	Develop EMS General Awareness training and presenting to new and existing staff	On-going	193 staff. 3 hours of training.
	Assist in maintaining baselines for affected divisions	On-going	Baselines completed.
	Coordinate the on-going procedure for aspects and impacts for CDPHE	On-going	Procedures developed Aspects identified
	Coordinate the on-going procedure for the identification of goals and objectives for CDPHE	On-going	Procedures developed Goals and objectives identified
	Implement selected projects in timely basis with clear measurable results, including: - Enhance CDPHE recycling program - Coordinate, participate on CDPHE paper reduction team: ensure teams develop and implement goals	On-going	8 projects completed  See Chapter 3.
Implement Governor's Greening Government Executive Order	Participate as one of 3 lead agencies in implementing Greening Government E.O.	On-going	Coordinate with Governor's Energy Office
	Hold regular meetings with other state agencies participating on the Greening Government team	On-going	Hold monthly Greening Government Council meetings. Approximately 15 attendees per meeting.
	Develop environmental policy	FY2007	Approval by Governor
	Develop baseline of environmental impacts (aspects and impacts)	FY2007	Baseline Completed
	Develop inventory of existing greening government projects	FY2007	Completed
	Identify targets and objectives	FY2007	Targets and objectives identified in Executive Order D 0011 07.

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
	Implement project to meet targets and objectives	On-going	Environmental outcomes currently being tracked.
	Provide assistance to all state agencies	FY2007	20
	Provide education and training for state employees		340
	Develop environmental preferential purchasing policies for state agencies		Legislation passed to address EPP.
	Develop a state-wide measurement tool and guidance		RFP sent out to develop tool.
	Report on projects and efforts	FY2007	Report on website
Partner with the Air Pollution Control Division	Support APCD in Oil and Gas P2 efforts	FY2007	Worked with APCD and Colorado Oil and Gas Commission to give details on SARA reporting and how it would affect the Oil and Gas industry in Colorado.
	Work with Governor's Energy Office to enhance the use of EE/RE in Colorado in air programs (SIPs, etc.)	On-going	Kilowatt hours of renewable energy developed Kilowatt hours of traditional forms of energy saved Developed system to track air emission benefits
	Work with APCD in implementing PPAB P2 report.	On-going	Environmental benefits Resource constraints have placed participation on hold.
Partner with the Consumer Protection Division to identify opportunities to incorporate cross media and pollution prevention into their programs	Work with Consumer Protection Division in implementing PPAB P2 plan.	On-going	Plan developed
			Replaced all CRT monitors with energy efficient LCD monitors. Approximately 20. Working with Department of Corrections on Greening Government/P2 activities.

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
Partner with the Hazardous Materials and Waste Management Division to incorporate cross media and pollution prevention into the programs	Work with Solid Waste Program as lead program to develop and implement a zero waste vision and goal for Colorado.	On-going	Vision developed and approved Working with Department of Health Care Policy and Financing as well as Department of Human Services on implementing solid waste reduction plans.
Partner with the Water Quality Control Division to highlight or incorporate prevention in the water programs	Stormwater Excellence Program	FY 2007 FY 2008	Projects identified and begin to implement
	Work with EPA HQ to ensure future and existing CAFO regulations allow for consideration of and mitigation of negative cross media impacts	FY 2007 FY 2008	See Chapter 2 above Success at federal level to regulate CAFOs on a cross media basis, including promoting composting and other prevention based solutions
	Work with Division to implement PPAB P2 plan	On-going	Resource constraints have placed participation on hold.
Cross-media Teams: continue to integrate sustainability concepts (including P2) into media divisions <ul style="list-style-type: none"> <li>• Cross Media Enforcement Team</li> <li>• Cross Media Compliance Assistance Team</li> <li>• Indicators/Measurement Team</li> <li>• Cross Media Inspector's Team</li> <li>• Cross Media Regulatory Team</li> <li>• Cross Media Permitting</li> </ul>	Participate in Cross-media Enforcement team	On-going	Progress on individual projects – see Chapter 3
	Participate in Cross-media Compliance Assistance Team	On-going	Progress on individual projects – see Chapter 3
	Participate in Environmental Indicators Team	On-going	Progress on individual projects – see Chapter 2
	Participate on Cross Media Inspector's Team	On-going	Progress on individual projects – see Chapter 3
	Identification and integration of P2 into regulations Cooperate with the PPAB in review of environmental regulatory programs, laws, and policies for sustainability opportunities and incentives	On-going	Number of regulations identified and proposals made to commissions Number of provisions included in regulations.

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
	Identification and integrations of P2 and sustainability into permitting	On-going	Number of permits where cross media considerations are included Environmental and economic benefits derived from sustainability and P2 in regulations Number of permitting programs with sustainability and P2
Consultation to Compliance Staff: promote P2 in enforcement programs	SEPs with P2 and sustainability measures	On-going	21 out of 34 completed SEPs with P2 elements. Environmental and cost benefits of P2 SEPs is detailed in each SEP Completion Report. For more SEP details, see Chapter 3.
	Inspections with sustainability and P2 assistance	On-going	Number of inspections where state offered P2 assistance or materials –worked with Frito Lay and New Belgium Brewing Company.
	Assist with updating SEP database for measurables	On-going	SEP database being revised using Sharepoint.
Participate on P2 Regional and National Programs -- P2 Locals meetings and coordination (activity shifting to local government Sustainability initiatives)	Provide the opportunity for quarterly local P2 programs Help organize meetings, promote, establish agendas, bring resources as appropriate Coordination and sharing of resources	On-going	Number of meetings - Assist in session development for National Environmental Partnership Summit Number of local entities represented – Activity on-hold waiting for key partner ( GreenPrint Denver) personnel changes Number of participants Environmental measurements if possible
-- Participate in NPPR activities	Semi-annual meetings in Fall and Spring	On-going	Participation in sessions and presentations - See NPPR activities above Participation in Fall event was conducted by conference call.

Cross Media and Pollution Prevention Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
-- Participate in Region VIII P2 Net activities	Conference calls/listserves of Healthcare P2 and sustainability groups		Participation and environmental measurements if possible Led by HMWMD staff (pharmaceutical initiative)
	Transfer of models to and from other states		Number of models or programs used in Colorado
	Quarterly conference calls Submit ideas for mini grants	On-going	Participation in meetings and on calls – Helped design and organize annual regional Roundtable, provided input for EPA Innovations conference on Sustainability Environmental benefits from grants
	Collaboration with the regional P2/P2Rx Center		Participation in meetings and on calls – Collaborating with Peaks to Prairies and NPPR Sustainability Workgroup to develop P2Rx Topic Hub on Sustainability; topic hub drafted by contractor and currently under review.

Pollution Prevention Advisory Board Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
Assist the Pollution Prevention Advisory Board (PPAB) in providing the maximum environmental benefit to CDPHE and other stakeholders:	Provide monthly meeting support, as well as support for various subcommittee meetings (Grants, Regulatory, Integration, External, GHG, ELP, and Executive)	On-going	Provided agenda, meeting logistics, minutes, and other documentation in a timely manner
	Advising CDPHE on continual improvement projects (including beyond compliance)		Advised Sustainability staff on earth day event outreach activities.
	Advising CDPHE on cross media compliance assurance (including permitting, compliance assistance, inspections, enforcement) programs		Advised the department on RMNP Nitrogen Deposition Plan and opportunities for funding an outreach program for residential fertilizer use.
	Advising CDPHE on internal and external outreach/ education programs		Advised Sustainability Program on Greening Government activities.

Pollution Prevention Advisory Board Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
	Development and implementation of state employee awards program for sustainability and P2 efforts		Employee incentive awards program is now apart of the Governor's Star Awards.
	Continue developing and implementing CDPHE Energy Efficiency and Greenhouse Gas Emissions Reduction Plan		The board provided financial support to the department to assist the Climate Change Coordinator to help implement the Governor's Climate Action Plan.
	Encouraging and advising on incorporation of sustainability and P2 into regulations		On-going
	Influencing legislative activities where appropriate		The board sent resolution to PUC in support of Xcel's 2007 Resource Plan.
	Developing and tracking indicators (health/environment) to measure effectiveness of sustainability programs		On-going
Administer the P2 Grants Program from the P2 Fund (~\$50,000 - \$100,000 annually)	Update Grant Announcement Update grants database Announce grant availability to ELP members first as an incentive Announce grant availability through email mailing and internet posting		No 2008/2009 P2 Grant Cycle. Grant process on-hold. Funding being directed to supporting Climate Change staffing, basic program support, ELP Leadership event and a statewide CFL and thermostat recycling program in partnership with Xcel, Encana and Ace Hardware stores.
Assist and support PPAB in grant review and selection process	Provide updated score sheets & submit proposals to committee Support committee in review process Prepare committee's grant selections/documentation for PPAB ratification of grant awards Notify grant recipients and prepare news release		No 2008/2009 P2 Grant Cycle, see above
Develop project schedule with grant recipients, support grant recipients and track project	Develop project schedule with grant recipients	On-going	No 2008/2009 P2 Grant Cycle, see above

Pollution Prevention Advisory Board Efforts			
Short Term Goals	Objectives	Timeline	Performance Measures
performance, make project results available to the public and develop P2 Grant Program Brochure to be updated with each new grant cycle	Support grant recipients and track project performance		A portion of the '09 grant fund given to CDPHE to fund the Climate Change Coordinator. Colorado is now a reporting member of The Climate Registry and is looking to launch an agricultural sequestration offset program. Other grant project performance is being tracked.
	Make project results available to the public		A press release was issued detailing the CFL recycling program. Climate change activities of the department as well as ELP information are available online.

TRI/SARA Program			
Subgoals	Objectives	Timeline	Performance Measures
Effectively and efficiently implement the EPCRA/SARA Title III TRI and Tier II programs Maintain the EPCRA/SARA Title III TRI and Tier II Databases	Receive and enter TRI and Tier II data from Colorado businesses (10,687 facilities; 17,385 chemical reports)	On-going	Timely and effective entering of data – Continues, EPA NEIEN grant has been received to upgrade SARA/P2 Fees business process and database, system will be designed and built in FY 2009.
	Develop and maintain the TRI/Tier II database	On-going	Database is searchable and maintained Continues
	Assess TRI fees, generate and mail bills, and monitor payments for annual data and submittals	Sept to Oct	Timely assessment of fees and mailing of bills Continues
	Utilize EPA internet based system for receipt of TRI reports	July	Electronic transfer of 90% of CO TRI data in FY08
Provide information internally, and to public and facilities on program	Respond to inquires regarding TRI reporting and payment requirements from Colorado businesses	On-going	Respond in timely manner Continues

TRI/SARA Program			
Subgoals	Objectives	Timeline	Performance Measures
	Respond to inquiries on information to the public and appropriate parties	On-going	Continues – Participated in 2 trainings by providing SARA compliance assistance (65 attendees); also participated with EPA Region 8 TRI staff in 10 TRI compliance assistance site visits.
	Generate chemical inventory reports for electronic transmittal to appropriate parties (LEPCs, CEPC, EPA, HMWMD Records Center, EMP)	December	Timely completion of report Continues Distribution of report
	Generate, distribute, and promote use of electronic annual TRI report	December	Timely completion of report – On-hold Number of hits on Internet – See above Internal use of data and reports
Promote the use of SARA and TRI/Risk Screening (RSEI) data in CDPHE's strategic planning and policy decisions	Review TRI & RSEI data to identify sectors with relatively more significant environmental impacts  Work with other environmental division (e.g., Cross Media Team) to incorporate TRI data in planning and decision-making	Fall of each year	Internal use of data and risk assessments – Waiting on EPA for additional years of TRI data to be processed into RSEI Reduction in quantity reported in Colorado

Environmental Leadership Program			
Subgoals	Objectives	Timeline	Performance Measures
Identify, recognize, and provide incentives to businesses and municipalities that are going beyond basic compliance with environmental requirements and are developing sustainable business practices	Grow the ELP while maintaining credibility of program and members	On-going	Number of member events held 1 Number of members participating offered to 200 Number of new services provided 20+ Policies, forms, etc are continually being updated – ongoing process.
	Provide member services and incentives (roundtables, workshops, networking opportunities, retreats, etc.)		
	Develop ELP e-Newsletter for members		
	Develop policies and administrative forms to support ELP (renewal, incentives, etc.)		

Environmental Leadership Program			
Subgoals	Objectives	Timeline	Performance Measures
Promote ELP to potential members through marketing and outreach	Provide ELP outreach to companies, trade associations, etc., including a combination of at least 35 presentations, recruitment meetings, and site visits with potential applicants annually	On-going	Number of presentations 163 Number of attendees 1926 Number of recruitment meetings 163
	Conduct seminars and/or provide training materials on EMS/ELP/P2/Sustainability to Colorado facilities and out of state entities	On-going	Number of presentations 20 Number of attendees 600 Number of entities reached 400
	Promote ELP programs internally and to local agencies for referrals	On-going	Number of referrals from state and local employees 80 Number of contacts with state and local employees 523 Number of new members as a result of internal referral 64 Environmental, economic and resource benefits from internal referrals n/a
Provide member services and mentoring Achievement Award members into ELP	Provide technical assistance and gap analysis for potential ELP members	On-going	Number of facilities provided assistance 26
			Environmental and resource benefits from assistance EMS Sector based equivalencies
	Provide EMS trainings, roundtables, workshops and other mentoring opportunities	On-going	Number of sessions and facilities participating 3 sessions and 79 facilities.
	Host a fall ELP/EMS training event for EAA/Gov. Challenge/CEP and other businesses and organizations	November	Number of attendees 40. CEP meeting.
	Develop an annual ELP progress report	December	Completion and electronic distribution of report goes to EPA and internal
	Expand ELP Website	On-going	Number of hits on website

Environmental Leadership Program			
Subgoals	Objectives	Timeline	Performance Measures
	Expand concepts of innovation including industrial ecology and environmental management systems with ELP members	On-going	Environmental and resource benefits from efforts new goals include community outreach and education activities, mentoring projects, third party audits for other facilities
Implement Gold Level ELP	Work with divisions to develop media-specific incentives for companies in the Gold Level	On-going	Number of incentives developed – no new developed, but maintained all in process ongoing Number of incentives implemented 10 Environmental, economic and resource benefits of incentives 5
	Expand membership in the Gold Level: enroll a minimum of 2 new participants annually	On-going	Number of new applicants 27 Number of EMSs assessed 27 Number of new members 15 Environmental, economic and resource benefits from all members Offsite Recycling of liquids such as solvents, oil, etc. 255,403,441 gallons. Tons of Solid waste recycled – 1,098,477 tons Energy Reduction – 321,562,479 kWh. 11,024 Mmbtu Renewable Energy Purchased – 44,002MWh, 2,494,411MMBtus, 1,602,275 kWh (companies report in different metrics).

Environmental Leadership Program			
Subgoals	Objectives	Timeline	Performance Measures
	Expand the recognition elements of the program for the Gold Level annually, including: Contact each ELP member and document successes Place successes on website with members' logos	On-going	Successes documented and measurements tracked Measurements on Internet site – All Bronze, Silver and Gold Leaders profiles on website Number of hits on Internet site see above
Silver Level ELP	Work with divisions to develop incentives for members	On-going	Number of incentives developed 0
	Conduct mentoring training (EMS) for members	On-going	Number of silver level members applying to gold level 0 Number developing and implementing EMSs 28
	Continue to grow membership in Silver Level: enroll new participants in Silver Level annually if they do not meet Gold Level Criteria	On-going	Number of new applicants 28 Number of projects assessed 28 Number of new members 25 N/A at this time, this is part of the reason to participate in the Silver Level  Bronze level – 44 applicants and 30 new members.

Environmental Leadership Program			
Subgoals	Objectives	Timeline	Performance Measures
	Partner with sectors to promote projects that qualify for Silver Level	On-going	Number of new applicants 28 Number of EMSs assessed 28 Number of new members 25 Environmental, economic and resource benefits from members associated with selected sectors N/A at this time, this is part of the reason to participate in the Silver Level
Implement additional levels of ELP to address areas of need; as resources allow, ELP will develop the following categories: -- Platinum Level for Sustainability -- Other levels as CDPHE determines appropriate	Work with divisions, internal and external advisory groups, and trade organizations to develop a program for Partners, including creating criteria, policies and incentives; obtain membership in this tier	FY 2007 FY 2008	Program established first Platinum Level stakeholder meeting in 2/2008 in process Stakeholder input in process Number of member organizations contacted or reached 40 Number of member organizations participating in ELP 20 Environmental, economic and resource benefits from members associated with organizations n/a
Develop and continue partnerships that result in incorporating EMS and leadership principles into CDPHE programs and processes or otherwise furthering leadership principles	Implement CDPHE EMS guidance document, and develop EMS policy and guidance	On-going	Completion of guidance Implementation of policy
	Partner with Stormwater Program in establishing Stormwater Excellence Program for construction industry (see Chapter 2)	FY 2007 FY 2008	See Chapter 2
	Partner with Wastewater/Water Treatment Programs in establishing a program to recognize facilities with stellar environmental performance		As resources allow

Environmental Leadership Program			
Subgoals	Objectives	Timeline	Performance Measures
	Partner with PEER Center in creating series of workshops to help local government put EMSs in place		Number of attendees at workshop N/A
	Partner with PEER Center in creating an EMA Awareness Course for local governments		Number of local governments reached N/A
	Continue to promote EMSs to other environmental programs and state agencies	On-going	Number of programs EMSs are utilized N/A Number of activities involving EMSs N/A
Leverage resources and partner with EPA Performance Track	Promote the programs through the MOU, including developing a list of potential members and determine which EPA and state should approach	On-going	Creation of list- complete Number of entities identified and contacted 8 Number of members obtained 2 Environmental, economic and resource benefits from resultant members included in above resources for Gold Leaders
Develop External ELP Advisory Group	Leverage through the PPAB and include other ELP members and other stakeholders	On-going	Creation of advisory group utilized as Platinum Level is designed Number of recommendations and ideas n/a at this time
Develop Internal ELP Advisory Group	Hold regular meetings for internal staff to advise ELP on various elements of the program, including compliance reviews and issues	On-going	Creation of advisory group - completed Number of recommendations and ideas – utilized on an as needed basis for support

Environmental Justice Program			
Subgoals	Objectives	Timeline	Performance Measures

Environmental Justice Program			
Subgoals	Objectives	Timeline	Performance Measures
Serve as intermediary between EPA and CDPHE on environmental justice issues	Participate, coordinate, and facilitate meetings between EPA, CDPHE and communities, as appropriate and necessary	On-going	Number of events facilitated – (1) attended annual Migrant Appreciation Evening in Greeley. Assisted in developing one event. 500 attended Migrant Picnic in Greeley. Number of events participated - met with EPA 2 times, attended Northern Area Migrant Coalition quarterly meetings 3 times Number of attendees - at Migrant Appreciation Event- 30 to 40 incl. exhibitors Environmental outcomes of events. Secured food donations for event.
	Attend, coordinate and/or facilitate (as appropriate) community or other environmental justice meetings for companies that are located in areas where environmental justice is a concern	On-going	Number of events attended – Attended 4 Strategic Elimination of Lead meetings with stakeholders. Number of events coordinated or facilitated -2 Number of attendees - 12 Environmental outcomes of events – nitrate levels reduced, heavy metals reduced, quality of drinking water improved through treatment system
Participate on the Employee Diversity Advisory Council	Expand awareness with CDPHE of the advantages of a diverse workforce in order to better serve a diverse client base and participate in diversity trainings	On-going	Number and type of events coordinated or facilitated N/A, duties were those of a former employee Number of attendees Environmental outcomes of events
Educate CDPHE staff	Participate in New Employee Orientation	On-going	Number of staff reached - 25

Environmental Justice Program			
Subgoals	Objectives	Timeline	Performance Measures
Participate on the Environmental Health Disparities Workgroup	Raise awareness of health disparity issues within the environmental divisions.	On-going	Number of outreach materials published – number of e-mails to division directors - 1 Number of meetings attended – five meetings to assist in HD Report and Strategic Plan Environmental outcomes of meetings/events – improved awareness and consideration given to link between environmental issues and health disparities. Final report – actively working to coordinate meeting of environmental divisions and division representation on the planning committee. Submitted one article for final Health Disparities Report.
Participate on EPA's environmental justice migrant farmer workgroup. There were no EPA meetings this year.	Participate on related subcommittees Raising, discussing and addressing issues Expand program if receive funding	On-going	Number of meetings attended - outreach to Labor Dept and Local Agencies to find more DW sites for Labor Camp SEP Number of attendees Success in addressing issues - no other projects were located Environmental outcomes of events - safer/better quality drinking water for migrant laborers Final report – N/A
Participate on the Limited-English Proficiency Workgroup	Expanding CDPHE ability to address limited-English proficiency issues	On-going	Identified the need for Spanish version of autobody outreach document. Number of documents translated - Dry cleaning compliance assistance calendar Number of people assisted - all Korean D/C receive the calendar, assisted Russian immigrant with translator services
Review documents that address environmental	Review documents and inform CDPHE	On-going	Number of documents reviewed

Environmental Justice Program			
Subgoals	Objectives	Timeline	Performance Measures
justice issues and inform CDPHE of emerging environmental justice issues as appropriate	Obtain information from: the EPA website, community newsletters, contacts and provide in meetings or correspondences as necessary		Environmental outcomes of efforts - reviewed Oil Shale EIS for EJ component adequacy

Small Business Ombudsman			
Subgoals	Objectives	Timeline	Performance Measures
Assist small businesses and small municipalities by increasing the efficiency and effectiveness of compliance assistance provided by CDPHE environmental divisions	Organize group of environmental assistance providers to discuss and implement effective and efficient ways of assisting small businesses and municipalities in meeting environmental requirements	On-going	Number of entities reached as direct outcome - met with GAP and SBAP at least 4 times, completed on-sites together to evaluate level of assistance provided One outreach to LEPC with SBAP – 30 people attended meeting.
Represent Colorado at a national level	Serve on the national 507 Steering Committee, including participate in monthly conference calls, review legislation and materials related to Colorado's program, and participate on subcommittees	On-going	Number of entities benefited as a result - Serving on planning committee for 2008 SBAP Annual Conference met with NSC at 2007 SBAP annual conf. Attended monthly and semi-weekly planning meetings.
Provide assistance and track assistance provided to small business and municipalities	Track calls and visits in the tracking database and input on bi-weekly basis	On-going	Number of calls received - 83 calls to SBO for assistance Number of entities assisted - 8 during CDPHE enforcement meetings Environmental and compliance outcomes of efforts
	Provide timely response to small businesses – within 3 days of initial contact	On-going	Number of entities contacted within 3 days – All were contacted within 3 days.

Small Business Ombudsman			
Subgoals	Objectives	Timeline	Performance Measures
	Send out surveys on small business outreach activities for completed SBAP assistance on a monthly basis  Results will be entered in the database and analyzed to determine areas for improved efficiency or alternate outreach methods	On-going	Number of surveys sent - 40 Number of surveys entered into database -40 Currently evaluating new way to conduct surveys.
	Contact trade associations and small business representatives that SBAP has worked with and get comments and feedback	On-going	Contact within 30 days of SBAP contact – Completed. PIAMS – immediate response/next day to gather input from association.
Serve as ombudsman for small business and municipalities.	Serve as an impartial resource for small businesses and municipalities that have complaints or concerns about fair treatment by the environmental divisions. Supply information to businesses and municipalities concerning their options and act as an impartial assistant in enforcement and permitting meetings and processes. Help to gather information that assists the divisions in understanding the businesses' and municipalities' actions.	On-going	Number of times assistance provided to businesses - 35 Number of contacts made with environmental staff - communicate often with Air, SBAP, GAP, HW and WQ and SW staff Environmental outcomes of assistance efforts
	Meet with industry groups and other agencies to foster partnerships for sharing resources and information for the purpose of educating small businesses and municipalities on environmental requirements, P2, sustainability and environmental leadership (program)	On-going	Number of meetings held - 8 meetings with Env. Div. and small businesses Number of partnerships created Environmental outcomes of partnership Meetings held – 1 with Printing Industry, 1 with gas industry, 1 with sand and gravel, 1 with autobody.

Small Business Ombudsman			
Subgoals	Objectives	Timeline	Performance Measures
	Review SBAP guidance documents prior to issuance and provide advisory opinions	On-going	Complete within 10 days of SBAP providing document - yes- autobody rule, dry cleaner calendar, printing guidebook, non road engines. Provided input on ozone non-attainment.
	Provide training and outreach on tools available for small businesses and the assistance available through SBAP	On-going	Participate in conferences or seminars and provide presentations as appropriate to further the small business programs - printers and dry cleaners sessions. Participated in one printer workshop.
Provide assistance and advice to the Air, Water, Waste, and Consumer Divisions and senior management and commissions concerning small businesses and communities.	Review division regulations, policies and guidance and provide advisory opinions to make the documents more small business friendly.	On-going	Gather list of guidelines that may impact small businesses - non road policies/regs.
			Number of guidelines and advisory opinions reviewed and written. Reviewed Open Burning guidance documents for APCD.
			Final report with recommendations
	Review new or modified guidance on an ongoing basis	On-going	Permitting Made Easy, and others discussed above. Met 3 times with internal team .
	Respond to requests from senior management/commissions to review policies, legislation, etc.	On-going	Review and make recommendations to the Small Business Community Flexibility Act – 1 request
			Reviewed SB 194 to ensure CDPHE small business information is assessable to the public .
Regulations reviewed to determine whether impact small businesses and provide information on the regulations to small business community	Ensure new and modified regulations that impact small businesses are reviewed, comments from the small business community are solicited, and the community trained	On-going	Obtain list of new regulatory programs
			Maintain regulatory contacts within each Division and request notification of new and modified regulations - on going with air through RCS unit mtgs, Air and WQ Division meetings

Small Business Ombudsman			
Subgoals	Objectives	Timeline	Performance Measures
			Review new regulations and modifications to regulations that affect small businesses and municipalities and provide comments and suggestions within the regulatory timeframe – completed, auto body (surface coating), CAFO regulations, Nine metals and new Area Source Rules.
			Solicit comments on new regulations from small business organizations and municipalities and present to appropriate regulatory agency as small business community comments - done through the CAP
			Provide training and outreach on new regulations as necessary in conjunction with the programs – as needed.
Assist small businesses in obtaining funding for environmental controls	Interface with SBDC, SBA, DOC and state agencies that may have programs to financially assist small businesses in need of funds to comply	On-going	Update the databases of state agencies and private sector financial institutions that may have such funds
			Post information on funds available on the website and/or other method to disseminate. Disseminated grant information when available and SEP opportunities.
Support the small business Compliance Advisory Panel	Assist in ensuring the Compliance Advisory Panel is an effective resource for small businesses and CDPHE	On-going	Present guidance documents, projects and issues to the CAP for its advisory opinions – work in conjunction with SBAP
			Assist CAP in issuing the advisory report and discuss with EPA. - autobody rule comments Developed annual report for CAP.



## 5.0 -- Air Pollution Control Division FY 2007 and FY 2008 Priority Work Plan Objectives

Annually, as part of the ongoing program planning process, Air Division Program Managers review national and state issues to identify areas for specific attention during the coming planning period. The list of priority objectives represents the major priorities both for the Air Division and in collaboration with our partners here at the Department, other local , state and federal levels for the first period of this CEPPA and the state fiscal calendar. Highlighting these areas provide an opportunity for closer attention to these topics. This is followed by the ongoing work plan for all the Air Division Programs and follows the major goal areas described earlier in this Chapter.

### FY 2007 Priority Objectives

Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
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Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
Energy (Region 8 priority)	<p>Participate in ongoing energy initiatives</p> <p>Participate in WRAP and WESTAR committees on regional haze SIP development and energy</p> <p>Participate in energy development activities with other local, state and federal agencies such as oil shale programmatic development and oil and gas development</p> <p>Implement provisions of HB 1341 – Coordination with Colo. Oil and Gas Conservation Commission</p> <p>Promote renewable energy and energy efficiency projects in settlement agreements</p> <p>Participate in Four Corners Task Force with EPA, FLMS, New Mexico and other stakeholders. Lead or participate in work groups (cumulative effects, monitoring, O&amp;G, other sources)</p> <p>Establish and participate in work groups (modeling and small engine standards)</p> <p>Participate in community based efforts to address impacts of oil and gas activities in Garfield and other possible counties in western Colorado (see cross-media discussion in Chapter 2 of PPA)</p>	<p>The Air Division continued to participate in several energy initiatives including oil and gas activities, updates to EISs, the Four Corners Forum and the Programmatic EIS for Oil Shale.</p> <p>The Air Division participated and contributed substantially to the implementation of HB 1341.</p> <p>Air Division staff have continued to refine the technical and engineering knowledge of oil and gas operations. This was highlighted by a number of oil and gas rule modifications being included in the ozone SIP revision approved by the Air Commission in December '08.</p> <p>The Four Corners Task Force has successfully finished, with a final report available to the public</p> <p>St. Sources Inventory group participated in WRAP emissions forum.</p> <p>St. Sources –participated in Kaizen permitting process for Oil and Gas sources and to develop a General Permit for RICE (available early 2009);</p> <p>Work with Garfield County has continued, including air quality group meetings and monitoring of urban areas and oil/gas development areas. Garfield County has completed an initial two-year project and final reports have been developed for the public.</p>

Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
Agriculture (Region 8 priority)	Continue work with communities and local agencies in agricultural areas to ensure an effective process is in place to address community-based issues relating to air quality	This is an ongoing effort in the Office of Env. Integration and Sustainability
Revitalization (Region 8 priority)	Continue to work with other CDPHE Divisions and stakeholders to ensure proper remediation or correction of any identified issue or problem	
Direct implementation (Region 8 priority)	NA	
EMS Permit Pilot Project	Continue to participate in development and implementation of CDPHE EMS Permit pilot program	The pilot phase was completed several years ago and portions of the pilot are being incorporated into ongoing policies and practices
Emergency Response	Assist with the continuing implementation of CDPHE Emergency Response Plan and national monitoring activities. Provide input on meteorological and forecasting issues and technical support to Crisis Management Center in the event of any releases of chemical, biological or nuclear agents	The Air Division provided many services during the DNC and continue to work with the Department's Emergency Response Division
Nonattainment/Maintenance SIP Updates	SIP Updates will be completed for the following areas: Canon City	In November, the Air Commission approved an updated PM10 Maintenance Plan for Canon City
Development of SIP revision for 8-hour NAAQS for Denver metro region and portions of northern Front Range in Colorado	SIP Revision will be initiated in Fall of 2007 with a completed Plan in September of 2008	Ozone SIP was adopted by the Air Commission at their December meeting

Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
AIR Program Updates	Continue Clean Screen implementation in Denver Enhanced Program modifications Begin Phase-out Basic Program in Larimer, Weld and El Paso counties	Clean Screen implementation continues. Dramatic increase in the number of vehicles clean screened, with approximately 40% of the I/M eligible fleet evaluated by remote sensing during the calendar year 2008.  More stringent cut-points adopted for the AIR program in 2008 resulting in a demonstrable increase in the ozone precursor emission reduction benefits from the program.  Enhanced program to be expanded to cover the urbanized areas of Larimer and Weld Counties for ozone.  Phase out of the basic program designed for carbon monoxide completed.
Diesel I/M updates	Implementation of New Inspection Reporting Procedures	Implementation of new inspection reporting procedures completed.
Clean Screen	See AIR Program	See comments in work plan
High Emitter Program developed as a SIP program	Activities in this area including: - Implementation of HB 06-1302 - Repair Your Air II Project	High emitter pilot project implemented commencing January 2008. During calendar year 2008 to date approximately 500 high emitting vehicles identified as part of the pilot. Work with RAQC on providing financial assistance for high emitting vehicle repairs as part of Repair Your Air II continues.

Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
Regional Haze SIP (Region 8 and Colorado)	<p>Complete technical support document for Colo. SIP submittal including analysis of IMPROVE data at Class I sites; updating emissions inventories and modeling analyses for 2018 and development of source attribution tools and techniques - August 2008</p> <p>Policy work will include: development of Colo. SIP with language consistent with EPA Rules and other EPA RH requirements; continued implementation of BART determinations; and, continue to implement and work toward an updated Long Term Strategy to meet RH Rule requirements - November 2008</p>	<p>In early 2008, a broad-based stakeholder process was initiated to address remaining elements of Regional Haze SIP including Reasonable Progress Goals and a Long Term Strategy to implement the goals. This process continued until the Spring of 2008 when staff were reassigned to complete work on Ozone SIP. The process will continue throughout calendar year 2009. Final BART determinations were completed on two remaining sources and approved in December 2008.</p>
Colorado Ozone	<p>Implement new ozone monitoring initiatives to include western Colorado and oil and gas expansion areas - July 2008</p>	<p>Ozone monitoring has commenced at three locations in western Colorado: Rifle, Palisade and Cortez. In addition, as part of west slope legislative footnote funding, meteorological monitoring has also been installed in Rifle and Palisade, PM2.5 monitoring in Rifle and Cortez, and a visibility camera in Rifle.</p> <p>Obtaining sites and approvals in the Front Range area for ozone/VOC/meteorological monitoring to help assess oil/gas development impacts has been problematic. Ozone and VOC monitoring equipment has been purchased and site locations are still being researched.</p>

Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
Rocky Mountain National Park Environmental Initiative (Region 8 and Colorado)	<p>Nitrogen deposition report approved and finalized including:</p> <p>Improved Ammonia inventory developed</p> <p>Critical load defined and strategic programs recommended for evaluation and implementation including an agricultural outreach program focusing on Best Management practices completed December 2007</p> <p>Additional funds for monitoring will be available for source attribution</p>	<p>Developed an ammonia inventory for urban fertilizer application</p> <p>Cooperating with WQCD in developing Section 319 program</p> <p>Continued discussion with other agencies on contingency measures for Plan</p>
Colorado Utility Mercury Reduction Program	Air Division will continue to provide management and coordination for the various elements of the Colorado Utility Mercury Reduction Program activities and seek EPA approval of program as submitted	Monitoring Recordkeeping and Reporting rule adopted. Sources will be installing monitors, if applicable, 1/1/09.

Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
Air Toxics focus (Region 8 and Colorado)	<p>Focus on biodiesel vehicle use and emissions study</p> <p>Continue to work with EPA to: identify communities with disproportional risk to air toxics and develop strategies to reduce risks; attend meetings which will build capacity to identify and characterize air toxic risks; and seek voluntary reductions as appropriate.</p> <p>Work with our counterparts at the regional and local level to implement the Clean School Bus Program and Voluntary Diesel Retrofit Programs</p> <p>Additional programs areas will be defined over next year</p>	<p>Continue to review National Air Toxics Assessments data (2002 NATA Preview-December); Division to comment on this by January deadline.</p> <p>Continue to assess Colorado Integrated Toxics strategy and develop appropriate implementation plans—including Colorado Clean Diesel (vehicle retrofit) program.</p> <p>Work with other Division programs to seek funding for additional monitoring and grant funding:</p> <p>2008: Planning &amp; Policy was successful in obtaining EPA DERA grant s through efforts with APCD Mobile Sources program.</p> <p>Continue to coordinate with EPA to integrate state and federal inventory development, modeling through EPA grant funding: Several grants to APCD in 2008.</p> <p>Finalize Colorado Diesel emissions and fuel sampling study (Done in 2003)</p> <p>Work with City and County of Denver on Air Toxics program efforts (We share data as needed)</p> <p>Identification of toxics hot spots in Colorado: Work in Garfield County, Pueblo and elsewhere</p> <p>Voluntary statewide diesel school bus retrofit program was successfully piloted in Pueblo; is being expanded to several additional counties statewide. Letters written to 25 school districts in 2008; December kick-off meeting with Garfield and Rio Blanco County districts.</p> <p>Continue joint participation with EPA and community stakeholders in Northeast Denver Project (Healthy Air for Northeast Denver-HAND Project): Updated data provided to this group in early Sept. '08)</p> <p>Continue Air toxics mapping (this took a</p>

Priority Topic (Region 8 and Colorado)	Planned Activities (state only)	Current status & accomplishments
NSR Update	Implementation of Revisions to Reg. 3 Parts A, B and C	No updates necessary. Working with EPA on approval of submitted modifications.
Compliance assistance and assurance	Participate in asphalt sector COMET EMS project development including EMS audits Participate on Cross Media Compliance Assistance Program, including sector projects and coordination between programs	Task completed and no longer needs to be on priority list. Printing & Imaging ERP in Phase II to include self-certification and SMS template. Self-certification for dry cleaning industry is incorporated into dry cleaning compliance calendar for 2009. Calendar will replace all dry cleaning guidance on web. Cross-media self-certification checklists and guidance are being created for NESHAPs 6(H) and 6(X). Continued Ozone Non-Attainment Outreach
Prescribed fire	Work plan element involves implementation of the portions of Regulation No. 9 relating to significant users of prescribed fire (SB01-214) also involves implementation of the portions of Regulation No. 9 relating to delegable programs to local agencies	APCD brought 4 new significant users to the Commission for public hearings. Additional authority has been delegated to Grand County to help address the pine beetle epidemic.
Community based activities	Continue to provide technical and process support (monitoring, emission inventories, or other air quality assessments for communities as needed.)	APCD has worked with communities around Colorado, including Rifle, Cortez, Palisade, Durango and Aspen to research the potential need for additional or new monitoring efforts.

5.6 Air Division Program Goals and Objectives – FY 2007- 8 Work Plan

Goal 5.6.1: Achieve a level of air quality that protects and preserves human health.

The key strategic measures to achieve this goal include: the continued implementation of the State SIP including revisions for Nonattainment Areas; the implementation of Ozone Early Action Compact for the Denver Metro area; the implementation of MOAs with other communities; ongoing state permit and compliance programs; and, encouragement, where appropriate, of voluntary emission control activities.

The key sub-goals goal include:

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air		
Program Strategy	Planned Performance measures	Current status & accomplishments
<b>MOBILE SOURCE PROGRAMS</b>		
5.6.1.1.1 Protect public health through operation of A.I.R. Program and Clean Screen Program – Regulation No. 11	<p>This Rule was removed, in part, from the SIPs by the Air Quality Control Commission in December 2005 and has been submitted to EPA for approval (pending). Current program activities relate to continuing program and implementation of HB11302:</p> <ul style="list-style-type: none"> <li>- Inspector training/certification maintained</li> <li>- Data collection and processing systems maintained</li> <li>- Support field enforcement activities by Dept. of Revenue</li> <li>- Monitor program quality and performance</li> <li>- Provide diesel opacity testing</li> <li>- Provide support to customers, inspectors, auto entities and repair technicians</li> </ul> <p>Implement HB 06-1302 – Including Clean Screen/High Emitter Components</p> <p>Prepare and submit Program Plan to Air Quality Control Commission to increase Clean Screening Program to SIP limits</p>	<p>Implementation of the AIR Program continues. Enhancements to the program in 2008 include adoption of more stringent cut-points and modification of visual inspection procedures to improve the effectiveness and efficiency of this component of the testing program. In December 2008, the AQCC approved regulatory changes to expand the enhanced emissions program to the North Front Range no later than July 2010. Inspector training and field enforcement activities continue. Significant increase in the amount of technical support to the repair industry and the motoring public, including the opening of a new technical center in 2008, a dramatic increase in the utilization rate of existing technical centers and quarterly technical seminars for the repair industry. High emitter pilot project implemented commencing January 2008. During calendar year 2008 to date approximately 500 high emitting vehicles identified as part of the pilot. Work with RAQC on providing financial assistance for high emitting vehicle repairs continues. Dramatic increase in clean screening from approximately 19% in 2007 to approximately 40% in 2008. Based on a data analysis performed in 2008, the actual disbenefit from clean screening</p>

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air		
Program Strategy	Planned Performance measures	Current status & accomplishments
		is less than the dis-benefit listed in the SIP. High emitter pilot project implemented commencing January 2008. During calendar year 2008 to date approximately 500 high emitting vehicles identified as part of the pilot. Work with RAQC on providing financial assistance for high emitting vehicle repairs continues.
5.6.1.1.2 Protect public health through operation of Diesel Inspection and Self-certification Program – Regulation No. 12 (State only)	Similar operation and training measures as A.I.R. Program (5.1.1.1) Work with our counterparts at the regional and local levels to implement the Clean School Bus Program and Voluntary Diesel Retrofit Programs	Continue oversight, training, and certification functions for the diesel inspection programs. Renewed efforts to ensure that fleets operating in the Denver area participate in the self-certification program. Commenced implementation of a school bus retrofit program on a statewide level. Obtained approximately \$1 million dollars in federal and private funding to undertake retrofits. Currently preparing contracting documents with retrofits expected to commence in late spring 2009.
5.6.1.1.3 Protect public health through the operation of Oxygenated Gasoline Program – Regulation No. 13	This Rule was removed from the SIPs by the Air Quality Control Commission in December 2005 and is being submitted to EPA for approval October 2006	Sampling for oxygen content throughout effective dates of program. No violations identified during 2007-2008 oxygenate season. Ongoing analysis regarding the effectiveness and necessity of the program
5.6.1.1.4 Reserved		
5.6.1.1.5 Protect public health through development and participation in mobile source air quality improvement strategies	<ul style="list-style-type: none"> <li>- Implement HB 06-1302 High Emitter Component</li> <li>Provide support to development of state run high emitting vehicle acceptable to U.S. EPA</li> <li>- Implement smoking vehicle programs</li> <li>1. RAQC Programs</li> <li>2. Auditor recommendations on potential hydrocarbon strategies under AIR Program</li> <li>3. Public outreach</li> <li>- Reduce emissions through fuel programs – area-</li> </ul>	High emitter pilot project implemented commencing January 2008. During calendar year 2008 to date approximately 500 high emitting vehicles identified as part of the pilot. Work with RAQC on providing financial assistance for high emitting vehicle repairs continues. Extensive data analysis ongoing to determine the potential value of using remote sensing to identify high emitting vehicles. Pilot program includes advisory evaporative leak check, which is providing important information on this

<p>Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 &amp; 2.5) and Lead</p> <p>EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air</p>		
Program Strategy	Planned Performance measures	Current status & accomplishments
	<p>wide assessment and report on RVP levels to AQCC as part of EAC Ozone Program. Prepare summary report on RVP</p> <p>Participate in MOVES model development and implementation</p> <p>Participate in EIS reviews as needed and Division cooperative project like Four Corners Task Force</p>	<p>often neglected aspect of automobile emissions. Extensive study undertaken and ongoing regarding potential RVP requirements as part of comprehensive ozone planning. Provided data as requested to EPA to help inform the MOVES model.</p>
5.6.1.1.6 Support development implementation of mobile source strategies through technical studies and operation of testing equipment and facilities	<p>Participate in cooperative E85 Study with U.S. Army and U.S. EPA</p> <p>Provide mobile source emission inventories and emission factors</p> <p>Operate and maintain Technical Centers</p> <p>Operate and maintain mass emissions testing facility</p>	<p>Completed hundreds of vehicle emissions tests at emissions testing lab in support of federal efforts at analyzing the impact of ethanol blending on emissions and drivability. Participated extensively in the 2008 ozone planning process by, among other things, providing mobile source emission inventory data. Continued to operate technical centers, including opening of a new center and increased utilization of existing centers.</p>
5.6.1.1.7 Protect public health through issuance of and operation of Construction Permits Program for stationary sources	<p>Document and address modeled NAAQS violations resulting from new source permitting or other actions. Identify whether existing sources; stationary or area source growth is suspected of causing the NAAQS violation. Notify EPA of the modeled NAAQS violation and provide EPA with a copy of the results within 60 days of completion (40 CFR 51.112(a) and Section 110(a)(2) of the ACT). Submit any SIP equivalency demonstrations and/or delegation requests in response to NSR Rules.</p> <p>Permits issued to minor sources in Colorado</p> <p>Synthetic minor permits issued to applicable sources in Colorado</p>	<p>The Technical Services Program has provided modeling support and review work for permit applications</p> <p>Possible modeled NAAQS violations for new and modified sources identified during permit review process and appropriate steps are taken prior to permit issuance to resolve issue. SIP equivalency demonstrations submitted when required.</p> <p>713 minor source permits issued plus an additional 1,023 general permit coverages.</p> <p>289 synthetic minor source permit issued.</p> <p>1 PSD permit issued.</p> <p>NSR permits issued consistently with national guidance and CAA requirements.</p>

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead

EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air

Program Strategy	Planned Performance measures	Current status & accomplishments
	<p>PSD permits issued</p> <p>NSR permits issued consistent with national guidance and CAA requirements</p> <p>Permits issued to major sources in nonattainment areas</p> <p>Enter RACT/BACT/LAER determinations in EPA's clearinghouse database (RBLC) including timeliness data (date application accepted and permit issuance date)</p> <p>Prepare AIRS data entry and forward to Inventory Group</p> <p>Track PSD increment periodically to meet the requirement of 40 CFR 51.166(a)(4)</p> <p>Work with Region on NSR permit program evaluation and set target to respond within 90 days to EPA's evaluation report and implement recommendations as warranted.</p> <p>Update NSR procedures re: Part B, RACT clarification, portable sources, and oil and gas condensate</p> <p>Develop General Permits for oil and gas construction and dry cleaning</p>	<p>No Nonattainment NSR permits issued.</p> <p>RBLC entries made as appropriate</p> <p>All required AIRS data forwarded to Inventory Group for entry.</p> <p>Tracked PSD increment during review of PSD permit applications and worked with the Technical Services Program to support their tracking efforts.</p> <p>Updated NSR procedures including a revised memo on portable sources.</p> <p>Issued a draft general permit for public comment for natural gas-fired compressor engines and anticipate issuance of permit in 2009</p>
5.6.1.1.8 Protect public health through operation of Operating Permits Program	<p>Document and address modeled NAAQS violations resulting from new source permitting or other actions. Identify whether existing sources; stationary or area source growth is suspected of causing the NAAQS violation. Notify EPA of the modeled NAAQS violation and provide EPA with a copy of the results within 60 days of completion (40 CFR 51.112(a) and Section 110(a)(2) of the ACT). Issue permits and significant permit modifications</p>	<p>The Technical Services Program has provided modeling support and review work for permit applications</p> <p>Possible modeled NAAQS violations for new and modified sources identified during permit review process and appropriate steps are taken prior to permit issuance to resolve issue.</p> <p>40% of initial/renewal Title V permits and significant permit modifications issued within 18</p>

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air		
Program Strategy	Planned Performance measures	Current status & accomplishments
	within 18 months of application completeness determination. Ensure sources submit Title V applications for renewal Prepare AIRS data entry and forward to Inventory Group Continue development of program with EPA guidance (Part 70) and input from affected parties Continue to issue proposed, initial, renewal, and modified Title V permits. Provide data on new Title 5 permits and permit modifications to R8 EPA for entry into TOPS 2003 Title V Program Review recommendation's implemented... Will continue to cooperate with EPA with target to implement recommendations as warranted.	months. All sources sent reminder letters 18 months prior to OP expiration. All required AIRS data forwarded to Inventory Group for entry. Revisions to Title V program made with EPA guidance and input and stakeholder involvement, as appropriate. All required TOPS data provided to EPA Region 8. Another EPA Title V program audit performed in 2008. Will continue to work with EPA with target to implement recommendations as warranted.
5.6.1.1.9 Protect public health through operation of Small Business Assistance Program	Evaluate and modify as needed Customer Relations Management Plan Industry workshops data collection and coordination Support Compliance Advisory Panel Participate in EMS Permit Project Update small businesses through site visits and technical assistance (MOU with Field Services Unit) Outreach and coordination with local health departments Provide consultations and site visits in accordance with MOU with Field Services Unit on enforcement referrals Participate in Cross Media Compliance Assistance	Compliance Advisory panel meeting quarterly.  Dry cleaner compliance calendar complete for 2009 and is being distributed.  Participating in cross-media projects for printing and surface coating.

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air		
Program Strategy	Planned Performance measures	Current status & accomplishments
	Program – sector projects and coordination Develop End-of-year report on compliance assistance efforts	
5.6.1.1.10 Support public health through program improvements – regulation and compliance support	Evaluate methods to incorporate P2 into regulations and permits as well as environmental assessments through participation in Compass and CMCA Programs Provide support and training to engineers and inspectors (policy interpretation, settlement documents, assist in negotiation of settlements, enforcement data base) Continue to monitor odor requirements and build partnerships to develop effective community and trade based odor control programs <del>Revise Reg. No 1 on EPA requests</del> Revised Reg. 7 (Oil and Gas Initiative) – continue implementation	The Air Division continue to look at opportunities to include P2 or other effectiveness option in permits. For example, general permits are now available for RICE and land development.  The Stationary sources Program has completed a number of efficiency reviews (Kai San) on the engineering and permitting process relating to oil and gas permits  The Division continue to work with Garfield and Mesa county on the development of odor control programs. This has involved specific sources and working with the community on air sampling and odor investigation Reg. Updates relating to the COGCC's rulemaking and the recent ozone SIP update will be implemented in a timely manner.
5.6.1.1.11 Support public health through oversight of local health department contracts and inspections (Field Services, Asbestos and CFC Units)	Contracts negotiated annually Inspection review, assistance as needed, enter reports on AIRS, maintain tracking logs, monitor quarterly reports Ensure proper certifications (odor & opacity) in place for local agency staff	Local Agency contracts renewed. San Juan basin contract added last year. Annual asbestos contracts with Denver, Pueblo and Jefferson Counties have been successfully renegotiated. CDPHE Asbestos Inspectors conduct co-inspections with county inspectors and review monthly county inspection report submittals.
5.6.1.1.12 Support public health through compliance inspections for industrial sources (major and minor) and final	Operating and other final permits reviewed Perform stack testing, source audits and CEM certifications	1252 inspections conducted Stack testing, source audits and CEM certifications performed as needed.

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air		
Program Strategy	Planned Performance measures	Current status & accomplishments
approval inspections	<p>Perform oversight of underground tank inspections by Oil and Gas Commission</p> <p>Provide AIRS updates as necessary through:</p> <ol style="list-style-type: none"> <li>1. Provide timely data to AFS as identified in the National Minimum Data Requirements (MDR's) on CMS sources evaluated or investigated, and on any other sources that are major according to CAA definition.</li> <li>2. Coordinate with EPA to ensure that CMS sources are flagged in AFS for inspection, and to ensure that high priority violations are correctly identified in AFS.</li> <li>3. Perform periodic reviews of AFS data to ensure required data have been entered correctly.</li> </ol> <p>Participate in Cross Media Compliance Assistance Program</p> <p>Compliance Monitoring Strategy submitted to EPA</p>	AIRS is updated regularly and Division meets quarterly with EPA to discuss AFS and enforcement matters
5.6.1.1.13 Support public health through wood burning emissions control	<p>Participate in High Pollution Advisory Program in Denver metro area</p> <p>Respond to and follow up on complaints</p>	On-going winter effort which provides daily forecasting, complaint response and public & media outreach
5.6.1.1.14 Support public health by conducting enforcement actions related to all stationary sources	Warning letters, compliance advisories, NOVs, compliance orders, AQCC hearings and Settlement Agreements (both state and local agencies)	189 enforcement actions taken
5.6.1.1.15 Support public health through testing and evaluation of industrial sources	<p>Conduct stack testing, source audits and CEM certifications</p> <p>Evaluate excess emission reports</p> <p>Conduct final approval inspections for facilities</p>	619 tests conducted (Includes RATAs) (519 without RATAs)
5.6.1.1.16 Support protection of public health through operation of a stationary source emissions and facility data	Maintain emissions and facility data system from new, revised and renewed APENs into data system	Inventory maintained 4,981 emission points added.

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air		
Program Strategy	Planned Performance measures	Current status & accomplishments
system	Submit national emission trends report Develop capabilities to comply with new EPA reporting system – NET Participate in ongoing training provided on National Emission Inventory By June 1, 2008 report required point source annual emission data for 2006 to the National Emission Inventory based on the following minimum reporting thresholds: SOX, NOX, and CO – 2500 TPY VOC, PM10, and NH3 – 250 TPY	Data submitted to NEI We have developed capabilities to comply.  Attended workshop Spring 2008.  Inventory submitted.
5.6.1.1.17 Support protection of public health through monitoring of local SIP commitments – Reg. No. 16 street sanding	Monitoring and assessing community SIP sanding reduction activities and reports	
SIP activities or community-based program development		
5.6.1.1.18 Support protection of public health through development of community based air quality programs in cooperation with local agencies or local governments	Continue Cripple Creek MOA implementation Continue Mt. Crested Butte MOA implementation Assist EPA Region 8 to develop community-based initiatives Assist and monitor Natural Events Action Plans and other community initiatives in San Luis Valley and Lamar (to support maintenance SIP) Assist Garfield County community-based initiative to address natural gas development concerns Seek to Identify other at risk areas through monitoring or other methods	The Division continued to oversee the ongoing efforts of Cripple Creek and Mt. Crested Butte to continue implementation of the MOUs for each community. The Division continued to work with the communities of Lamar and Alamosa on the implementation of the Natural Events Action Plans. We also discussed a voluntary NEAP with Grand Junction and Mesa County Ongoing Work with Garfield County has continued, including air quality group meetings and monitoring of urban areas and oil/gas development areas. Garfield County has completed an initial two-year project and final reports have been developed for the public.
5.6.1.1.19 Protection public health	Canon City PM10 Maintenance Plan	Canon City Maintenance Plan adopted by Air

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Program Strategy	Planned Performance measures	Current status & accomplishments
through the development of maintenance SIPs and redesignation requests for current nonattainment areas in Colorado	Develop Ozone SIP revision for Denver Metro and Northern Front Range - Fall 2008  Develop and submit SIP revision for interstate transport for 8-hour ozone and PM2.5 NAAQS	Commission in November 2008. Ozone SIP revision demonstrating attainment of the 1987 Ozone 8-hour NAAQS was approved by the AQCC for Denver Metro and Northern Front Range in December 2008 110 SIP approved by legislature and forwarded to EPA in June 2008 and updated for ozone NAAQS in December 2008.
5.6.1.1.20 Protect public health through monitoring transportation conformity of MPO and CDOT programs and projects – Regulation No. 10	Conformity determinations for Metropolitan Planning Org. (MPOs) areas along Front Range. (NOTE: Colorado is awaiting EPA/FHWA guidance on how to revise Reg. 10. to address Conformity requirements)  (Note: updated Transportation Conformity SIPs submitted by July 2005 will reflect revised EPA Transportation Conformity Regulations in 40 CFR 93 and Transportation Law –SAFETEA-LU) Pikes Peak Area Council of Governments – September 2004	Conformity determination (CD) hearings before the AQCC for Metropolitan Planning Org. (MPOs) areas along Front Range in 2008 included: Feb. - First CD for DRCOG 2035 RTP and 2008/2013 TIP July – CD for DRCOG First Cycle amendments to the 2035 Plan and TIP Sept. – First Joint Interim CD for 8-Hour Ozone Nonattainment Area, as required within 1 year of NAA designation). Dec. 19 – CD for DRCOG Second Cycle amendments to its 2035 Plan and TIP (joint/interim with North Front Range MPO)  Developed the 8-Hour Ozone Area Conformity MOA, signed by APCD, DRCOG, North Front Range MPO, the Upper Front Range Transportation Planning Region, CDOT and the Regional Air Quality Council in March.  Colorado revised AQCC Regulation No. 10, <i>Criteria for Conformity Determinations</i> , in November 2008

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Program Strategy	Planned Performance measures	Current status & accomplishments
		to align it with EPA's final (Jan. 2008) Transportation Conformity Regulations.
5.6.1.1.20 Protect public health through the support of NEPA activities including review of air quality impacts disclosed in NEPA documents	Review and comment document/letters prepared for NEPA documents and follow up as appropriate Environmental review and comment	Numerous project proposals were reviewed including oil shale and several transportation projects.
5.6.1.1.21 Protect public health through development of a Health Department-wide alternative commuting program (this would be a pilot or model program patterned after EPA's "Best Work Places for Commuters" and will be for state agencies to pattern similar programs after)	Program Plan Report: <ul style="list-style-type: none"> <li>- Baseline evaluation (current participation, program effectiveness)</li> <li>- Assessment of marketing and education</li> <li>- Assessment of implementation and monitoring</li> <li>- Overall program evaluation and recommendations; and, if warranted, development of materials and information for other State Departments and other agencies.</li> </ul>	Program evaluation completed and additional funding being pursued to implement pilot state agency program
5.6.1.1.22 Protect public health through implementation of fire management and control programs	Implement enhanced smoke management program for wildland prescribed fire as per Reg. 1 and Reg 9. Implement general open burning program Conduct oversight to ensure that permittees implement best air quality protection practices in prescribed burning events Implement local delegation component of program Prepare for wildfire monitoring and public health advisories during such events	Over 300 permits issued for wildland pile and broadcast burns. Field inspections occur for approximately 1/3 of all projects/year to ensure compliance with best burn practices. To address large volume of biomass from pine beetle epidemic, APCD delegated additional authority to Grand County for permitting pile burns. Emergency preparedness meetings occurred to plan for summer 2008 wildfire season.
5.6.1.1.23 Track indicators through monitoring, maintaining inventories and modeling	- Implement ambient air monitoring program in accordance with 40 CFR Part 58 <i>The State will work with EPA to assess the impacts of the proposed changes to 40 CFR Part 58, and</i>	Air monitoring around Colorado continues at approximately 60 different sites for both criteria and non-criteria pollutants/parameters.

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead

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Program Strategy	Planned Performance measures	Current status & accomplishments
	<p><i>begin planning for the implementation of those changes (National Monitoring Strategy/NCore Monitoring Network)</i></p> <ul style="list-style-type: none"> <li>- Operate and maintain gaseous and particulate (PM-10 and PM-2.5) monitoring network statewide. Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules. Perform manual bi-weekly precision tests</li> <li>- Annually review the Quality Management Plan (QMP) and submit a copy to EPA</li> <li>- Revise Quality Assurance Project Plan (QAPP) and submit to EPA</li> </ul> <p>Operate ambient air monitoring network in accordance with QAPP Per CFR schedule</p> <ul style="list-style-type: none"> <li>- Modify and Update EPA AQS System</li> <li>- Provide for independent audits through EPA's TTP-NPAP or an approved independent audit system per 40CFR 58.</li> <li>- Participate with EPA in 2008 Technical Systems Audit</li> <li>- Per CFR schedule, submit AQS SLAMS report electronically to EPA</li> <li>- Develop Monitoring Network Plan and submit to EPA after 30 day public inspection period and per CFR schedule</li> <li>- Establish an additional ozone monitor in Denver at the proposed NCore site , at DMAS..</li> <li>-</li> <li>- Produce Annual Air Quality Data Report</li> </ul>	<p>Precursor-level carbon monoxide and sulfur dioxide analyzers, an ozone analyzer as well as PM2.5 and PM10 samplers have been installed at the proposed NCore monitoring site. Most meteorological sensors have been installed as well.</p> <p>All monitoring is being performed in accordance with 40 CFR 58 requirements and in accordance with the approved QAPP.</p> <p>All criteria pollutant monitoring data are submitted to the EPA AQS within required time frames.</p> <p>The 2007 Air Monitoring Data Report was completed, put out for public comment, published and submitted to EPA.</p> <p>EPA Region VIII completed TTP audits at 3 sites.</p> <p>Plans for a TSA by EPA have been delayed. It is currently scheduled for Nov. 2008.</p> <p>The 2007 SLAMS report was developed and submitted to EPA prior to the June 1, 2008 deadline.</p> <p>The 2008/09 Network Monitoring Plan was developed and submitted to EPA. Minor comments have been received back and responses submitted to EPA.</p>

Sub-goal 5.6.1.1: Attain and maintain existing standards for criteria pollutants: Ozone, Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, Particulate Matter (PM-10 & 2.5) and Lead EPA 2003-2008 Strategic Plan Objective – Healthier Outdoor Air		
Program Strategy	Planned Performance measures	Current status & accomplishments
	<ul style="list-style-type: none"> <li>- Data reviewed for completeness, precision and accuracy and QA / QC Review and Report Project submitted.</li> <li>- - Conduct High summer and winter pollution forecasts and advisories and prepare High Pollution Advisory Season and Summer Ozone Advisory Statistics</li> <li>- Development of an Integrated Approach / Methodology for Inventory Development</li> <li>- Inventory and modeling support to State SIPs and Ozone Early Action Compact</li> <li>- Develop billable permit modeling support</li> <li>- Emergency Response Forecasting and Support to CDPHE Emergency Response Planning</li> <li>-</li> <li>- Operate NCORE monitoring station in Denver</li> <li>- Attend EPA sponsored monitoring training workshops</li> </ul>	<p>The APCD issues daily air quality forecasts during the winter months; a “red” forecast triggers the mandatory residential burning curtailment activities. In addition, summer ozone forecasts were issued on a daily basis, in conjunction with the RAQC.</p> <p>Inventory and modeling work to support the Ozone SIP is ongoing.</p> <p>Emergency Response Forecasting has been developed and implemented, as well as tested during the DNC.</p>
5.61.1.24 Track indicators through monitoring, maintaining inventories and modeling	Per Quarterly CFR Schedule, submit all ambient criteria pollutant data to the Air Quality System (AQS)	All criteria monitoring data are submitted to EPA's AQS within 90 days form the end of each month.
5.6.1.25 Protect public health through the development of a State Implementation Plan revision for the 8-hour ozone NAAQS	Metro Denver-Northern Front Range State Implementation Plan Revision for the 8-hour ozone NAAQS completed September 2008	Ozone Plan completed and adopted by Air Commission on Dec. 12, 2008.

<p>Sub-goal 5.6.1.2: Reduce air toxics. Protect citizens from exposure to air toxics – Ensure that the excess number of cancers are reduced by 75% by 2010 from 1993 levels and to ensure that 90% of toxic and hazardous emissions are subject to standards.</p> <p><i>(Note: Many of the programs or strategies listed in this section were described in detail earlier therefore they are only highlighted here. Where new areas are identified they are described in full.)</i></p> <p>EPA 2003-2008 Strategic Plan Consistent Objective – Healthier Outdoor Air</p>		
Program Objective	Performance measures	Current status & accomplishments
5.6.1.2.1 Reduce air toxics through the ongoing operation of mobile source strategies		
Regulation No. 11 – A.I.R. Program Regulation No 12 – Diesel Inspection Regulation No. 13 – Oxygenated Fuels Program Smoking vehicles Clean fuels	Activities and milestones are described in earlier work plan tasks section 5.1.1. parts 1-6 Research and evaluate mobile source toxic emission reduction and prevention strategies	Described under activity 5/6.1.1
5.6.1.2.2 Reduce air toxics through operation of stationary source control strategies-MACT implementation: Operation of Construction and Operating Permit Programs Small Business Assistance Program Compliance monitoring and enforcement of stationary sources Wood burning Control Program – High Pollution Advisory Program and state and local woodstove regulations Fire management and control programs	Activities and milestones are described in earlier work plan tasks section 5.1.1. parts 7-20	Toxics controlled through implementation of MACT program in permitting, inspections and enforcement. Other areas are addressed in earlier sections of this report.
5.6.1.2.3 Support reduction of air toxics through regulation update	Revise Reg. No. 8 Parts A & E incorporating MACT and NESHAP rulemaking updates and development of cooperative federal/state work plan. To include: funding options, addressing 112(j) compliance deadlines, development and implementation of area source rules, development of information, incorporation of pollution prevention where appropriate,	Division will be doing updates for MACT and NSPS in May 2009.

Sub-goal 5.6.1.2: Reduce air toxics. Protect citizens from exposure to air toxics – Ensure that the excess number of cancers are reduced by 75% by 2010 from 1993 levels and to ensure that 90% of toxic and hazardous emissions are subject to standards.

*(Note: Many of the programs or strategies listed in this section were described in detail earlier therefore they are only highlighted here. Where new areas are identified they are described in full.)*

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Program Objective	Performance measures	Current status & accomplishments
	and analyses regarding air toxics. Semiannual MACT updates in June and Dec.	
5.6.1.2.4 Reduce asbestos exposure to the public through operation of the Asbestos Program	Conduct 200 inspections for compliance with Regulation No. 8 and NESHAP Review notifications; issue abatement and demolition permits Process certification applications; issue certifications Initiate enforcement actions; timely and appropriate resolution of cases Conduct outreach activities Incorporate requirements in local health department contracts Conduct Rulemaking, as necessary Enter data into a database for all asbestos NESHAP notifications and enforcement actions	Processed 2459 Individual Asbestos Certifications. Processed 196 Company Asbestos Certifications.
5.6.1.2.5 Reduce occurrences of asbestos in schools (CDPHE will implement activities as described in work plan narrative “TSCA Title IV Cooperative Agreement – FY07 Application 6-30-06)	Implement the TSCA Asbestos-in-Schools Program according to federal and state rules Conduct 48 TSCA/AHERA inspections	For FFY 07/08 -The Asbestos Unit: Performed over 500 Regulation 8 and NESHAP compliance inspections. Conducted 24 Asbestos Course Audits Reviewed and processed 2,689 abatement and demolition permits and notices Issued 2,459 individual and 196 company asbestos certifications The Unit has been successful in closing old cases as well as in the timely initiation and suitable closure of new cases. Conducted outreach activities to the following:

Sub-goal 5.6.1.2: Reduce air toxics. Protect citizens from exposure to air toxics – Ensure that the excess number of cancers are reduced by 75% by 2010 from 1993 levels and to ensure that 90% of toxic and hazardous emissions are subject to standards.

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Program Objective	Performance measures	Current status & accomplishments
		<p>Northeast Counties Health Department Pueblo County Weld County and City of Windsor, City of Berthoud</p> <p>Requirements of Regulation No.8 have been included in local health department contracts.</p> <p>A Rulemaking Hearing before the AQCC was held in December of 07. It encompassed a fee change, and the registration of asbestos laboratories, consulting firms and training providers.</p> <p>The Unit maintains a database for notifications/enforcement.</p>
5.6.1.2.6 Implementation of a Lead-based paint certification and abatement program. Where possible, provide financial assistance to the Disease Control and Environmental Epidemiology Division's Lead Poisoning Prevention Program (LP3). to perform database management activities related to the identification of populations at risk for childhood lead poisoning to aid APCD in identifying hotspots.	<p>Issue permits and approval notices</p> <p>Conduct 20 "402" inspections( Conduct 10 "406(b)" inspections</p> <p>Process 72% of viable lbp Certification applications in less than 20 days</p> <p>Course audit</p> <p>Initiate enforcement actions</p> <p>Distribute educational material - LP3</p> <p>Partner with local health departments</p> <p>Partner with state and local housing agencies</p> <p>Identify and focus enforcement and compliance assistance on populations at risk for childhood lead poisoning by utilizing information from DCEED's EBL surveillance database.</p>	<p>Issued 82 permits</p> <p>Conducted 24 "402" inspections and 4 "406(b)" inspections</p> <p>Processed 100% of viable lbp certification applications in less than 20 days:</p> <p>133 individual certifications</p> <p>49 firm certifications</p> <p>Conducted 9 audits</p> <p>Pursuing 3 enforcement actions including:</p> <p>1 "402" case</p> <p>2 "406(b)" cases</p> <p>Continue ongoing outreach and awareness activities</p> <p>Strategic Plan – 5 local health department partners 3 housing agency partners</p> <p>Continue to maintain EBL database</p>
5.6.1.2.7 Support protection of public health by non-regulatory HAP source evaluations		The Technical Services Program has requested and received support from the Environmental Epidemiology Program for

<p>Sub-goal 5.6.1.2: Reduce air toxics. Protect citizens from exposure to air toxics – Ensure that the excess number of cancers are reduced by 75% by 2010 from 1993 levels and to ensure that 90% of toxic and hazardous emissions are subject to standards.</p> <p><i>(Note: Many of the programs or strategies listed in this section were described in detail earlier therefore they are only highlighted here. Where new areas are identified they are described in full.)</i></p> <p>EPA 2003-2008 Strategic Plan Consistent Objective – Healthier Outdoor Air</p>		
Program Objective	Performance measures	Current status & accomplishments
(coordination with CDPHE Environmental Epidemiology)		risk analyses. In particular, analyses have been performed for Garfield County monitoring related to oil/gas development and for data from the Grand Junction National air Toxics Trends Station.
5.6.1.2.8 Support protection of public health through operation of a stationary source emissions and facility data system	Maintain emissions and facility data system, enter and quality control emissions data from new, revised and renewed APENs	EMS data base maintained and updated
5.6.1.2.9 Support protections of public health through development of mobile source toxics emissions inventory	Conduct motor vehicle mass emissions testing Generate mobile source emission factors Research additional source categories for Colorado Diesel Emissions Study	Inventories maintained
5.6.1.2.10 Develop integrated air toxics program	Continue review National Air Toxics Assessments data and comment on proposed rules and policy Continue to assess Colorado Integrated Toxics strategy and develop appropriate implementation plans Work with other Division programs to seek funding for additional monitoring and grant funding Develop an integrated approach / methodology for inventory development, modeling through EPA grant funding Finalize Colorado Diesel emissions and fuel sampling study Work with City and County of Denver on Air Toxics program efforts Develop comprehensive 2004 Colorado	Continue to review National Air Toxics Assessments data (2002 NATA Preview-December); Division to comment on this by January deadline. Continue to assess Colorado Integrated Toxics strategy and develop appropriate implementation plans—including Colorado Clean Diesel (vehicle retrofit) program. Work with other Division programs to seek funding for additional monitoring and grant funding: 2008: Planning & Policy was successful in obtaining EPA DERA grant s through efforts with APCD Mobile Sources program. Continue to coordinate with EPA to integrate state and federal inventory development, modeling through EPA grant funding: Several grants to APCD in 2008. Finalize Colorado Diesel emissions and fuel sampling study (Done in 2003) Work with City and County of Denver on Air Toxics program

Sub-goal 5.6.1.2: Reduce air toxics. Protect citizens from exposure to air toxics – Ensure that the excess number of cancers are reduced by 75% by 2010 from 1993 levels and to ensure that 90% of toxic and hazardous emissions are subject to standards.

*(Note: Many of the programs or strategies listed in this section were described in detail earlier therefore they are only highlighted here. Where new areas are identified they are described in full.)*

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Program Objective	Performance measures	Current status & accomplishments
	<p>Air Toxics report</p> <p>Begin formal identification of toxics hot spots in Colorado</p> <p>Explore potential voluntary statewide diesel school bus retrofit program</p> <p>Continue joint participation with EPA and community stakeholders in Northeast Denver Project (Healthy Air for Northeast Denver-HAND Project)</p> <p>Continue school bus retrofit project in Pueblo</p> <p>Continue Air toxics mapping</p> <p>Attend HAPS inventory training in order to complete 2005 HAP Emission inventories for point, non-point, non-road and on-road sources</p>	<p>efforts (We share data as needed)</p> <p>Identification of toxics hot spots in Colorado: Work in Garfield County, Pueblo and elsewhere</p> <p>Voluntary statewide diesel school bus retrofit program was successfully piloted in Pueblo; is being expanded to several additional counties statewide. Letters written to 25 school districts in 2008; December kick-off meeting with Garfield and Rio Blanco County districts.</p> <p>Continue joint participation with EPA and community stakeholders in Northeast Denver Project (Healthy Air for Northeast Denver-HAND Project): Updated data provided to this group in early Sept. '08)</p> <p>Continue Air toxics mapping (this took a back seat to Ozone modeling and inventory work in 2008)</p> <p>Air toxics monitoring continues in Grand Junction as part of the National Air Toxics Trends Stations project.</p> <p>The Technical Services Program has worked with the City and County of Denver to help fulfill their EPA Community Air Toxics Grant by uploading data to the EPA AQS. Similar work is currently underway with Boulder County.</p>
5.6.1.2.11 Implement cross-media initiatives	<p>Continue implementation of mercury reduction and other environmental initiatives at Colorado Dept. Public Health and assist in development of Mercury TMDL</p> <p>Ensure Mercury is considered in environmental Division's review and consideration of oil shale and other energy-related initiatives.</p>	<p>Staff promotions and reassignments have resulted in a limited amount of staff time being spent on this measure. The Environmental Integration and Sustainability Program will be assuming the lead in these areas in the next year.</p>

Sub-goal 5.6.1.2: Reduce air toxics. Protect citizens from exposure to air toxics – Ensure that the excess number of cancers are reduced by 75% by 2010 from 1993 levels and to ensure that 90% of toxic and hazardous emissions are subject to standards.

*(Note: Many of the programs or strategies listed in this section were described in detail earlier therefore they are only highlighted here. Where new areas are identified they are described in full.)*

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Program Objective	Performance measures	Current status & accomplishments
	<p>Coordinate and take lead on pharmaceuticals in the environment reduction efforts among all relevant CDPHE divisions and external stakeholders;</p> <p>Coordinate and take the lead on health and environmental effects of nanomaterials efforts among all relevant CDPHE division and external stakeholders;</p> <p>Participate in Env. Council of the States/Quicksilver Caucus activities.</p> <p>In coordination with CDPHE development and implementation of: EMS Permit pilot project, Cross Media Compliance Assistance Program, Cross Media Enforcement Program, and Environmental Coordinating Committee</p>	
5.6.1.2.12 Track program indicators through other program monitoring, maintaining inventories and modeling	<p>Perform daily, weekly, monthly, quarterly, and semi-annual inspections, cleaning, and preventive maintenance per SOP schedules. Perform manual bi-weekly precision tests.</p> <p>Conduct Special Gaseous Monitoring Projects.</p> <p>Report any EPA funded special studies and outcomes to Region 8</p> <p>Operate Particulate Monitoring System</p>	<p>Air monitoring around Colorado continues at approximately 60 different sites. All monitoring is being performed in accordance with 40 CFR 58 requirements and in accordance with the approved QAPP.</p> <p>A passive ozone study was performed in July and August 2007 in three areas of Colorado: Northeast Front Range, Western and Southwestern. A final report is under development.</p>

Sub-goal 5.6.1.2: Reduce air toxics. Protect citizens from exposure to air toxics – Ensure that the excess number of cancers are reduced by 75% by 2010 from 1993 levels and to ensure that 90% of toxic and hazardous emissions are subject to standards.

*(Note: Many of the programs or strategies listed in this section were described in detail earlier therefore they are only highlighted here. Where new areas are identified they are described in full.)*

EPA 2003-2008 Strategic Plan Consistent Objective – Healthier Outdoor Air

Program Objective	Performance measures	Current status & accomplishments
	<p>Coordinate National Air Toxics Trends monitoring site in Grand Junction:  Maintain and repair VOC/carbonyl/Cr+6 and PM10/metals monitoring equipment. Install and maintain additional equipment as needed, for expanded monitoring, including semi-volatile organic compounds (SVOC). Perform calibrations and audits on the equipment. Interpret and report data received from the analytical lab. Submit metals data to AQS within 90 days after the end of each quarter. Provide quarterly analysis updates. Perform monitoring according to the NATTS QAPP. Review and Update QAPP as necessary</p> <p>Operate and Maintain Meteorological Monitoring Equipment</p> <p>Modify and Update EPA AQS System</p> <p>Produce Annual Air Quality Data Report</p> <p>Notify EPA Region VIII in writing of any NAAQS exceedances or excursions within 45 days via email or phone</p> <p>QA / QC Review and Report Project</p> <p>Produce Annual Network Review. Review Site Files</p> <p>Development of an Integrated Approach / Methodology for Inventory Development</p>	<p>Air toxics monitoring continues in Grand Junction as part of the National Air Toxics Trends Stations project. All work is being performed according to the QAPP and according to required EPA guidelines for the project.</p> <p>Meteorological monitoring is ongoing.</p> <p>All criteria pollutant monitoring data are submitted to the EPA AQS within required time frames.</p> <p>The 2007 Air Monitoring Data Report was completed, put out for public comment, published and submitted to EPA.</p> <p>EPA has been notified of any NAAQS exceedances/excursions. Exceptional/natural event documents have been developed as needed and submitted to EPA for approval.</p> <p>The 2008/09 Network Monitoring Plan was developed and submitted to EPA. Minor comments have been received back and responses submitted to EPA.</p>

Goal 5.6.2: Achieve levels of air quality in Colorado that protects the integrity of the natural ecosystem.

The key strategic targets to achieve this goal include: implementation of Acid Deposition Program

Implementation of PSD program, implementation of CFC control programs, development and implementation of cross-media programs to reduce Mercury and, encouragement, where appropriate, of voluntary emission control activities to reduce Greenhouse Gas Intensity.

<p>Sub goal 5.6.2.1: Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.</p> <p>Sub goal 5.6.2.2: Stratospheric ozone protection – Ensure programs to control CFC compounds are maintained.</p> <p>Sub goal 5.6.2.3: Climate change – Ensure climate change issues are identified and Governor’s Greening Government Programs are implemented .</p> <p>Sub goal 5.6.2.4: Protect environment from Mercury contamination –</p> <p>EPA 2003-2008 Strategic Plan Consistent Objective – Protect Ozone Layer and reduce Greenhouse Gas Intensity</p>		
Program objective	Planned Performance measures	Current status & accomplishments
5.6..2.1.1.1 Ensure acid rain minimized through operation of construction and operating permit programs	Permits issued to utilities	Acid rain permits issued through Title V permit program and inspected.
5.6..2.1.1.2 Ensure acid deposition emissions are minimized through testing and evaluation of industrial sources	Conduct stack testing, source audits and CEM certifications for utilities Evaluate excess emission reports for utilities	Stack tests, source audits and CEM certifications conducted.  Excess emission reports evaluated quarterly.
5.6.2.1.1.3 Ensure acid rain minimized though updates to Regulation No.18 as necessary	Revised regulation	No updates necessary.

<p>Sub goal 5.6.2.1: Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.</p> <p>Sub goal 5.6.2.2: Stratospheric ozone protection – Ensure programs to control CFC compounds are maintained.</p> <p>Sub goal 5.6.2.3: Climate change – Ensure climate change issues are identified and Governor's Greening Government Programs are implemented .</p> <p>Sub goal 5.6.2.4: Protect environment from Mercury contamination –</p> <p>EPA 2003-2008 Strategic Plan Consistent Objective – Protect Ozone Layer and reduce Greenhouse Gas Intensity</p>		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.2.1.4 Support technical assessment of Mt. Zirkel AQRVs	<p>Process coordination and communication with EPA, USFS and USGS Develop a plan for assessing the ecological impacts of acid deposition in the State, especially as it may impact vulnerable, acid-sensitive ecosystems, with attention to possible cause-and-effect relationship between emission sources and impact areas.</p> <p>Support installation of Buffalo Pass SO2 monitor</p> <p>Conduct additional data analyses on Mt. Zirkel</p> <p>Respond to any format triggering of AQRV law</p> <p>Prepare report on Mt. Zirkel analyses and comparative studies</p>	<p>Meeting with USGS, EPA and USFS held Summer '08 to plan next round of analytical assessments of the combined emission reductions from Hayden and Craig power plants. One more year of data collection agreed to prior to joint project to analyze emission reduction effects on Mt. Zirkel Wilderness Area.</p> <p>Buffalo Pass SO2 will continue thru Fall 2009.</p>
5.6.2.1.5 Support AQRV studies in Colorado	<p>CDPHE acid deposition web page</p> <p>Coordinate funding and communication between federal agencies and state</p>	<p>Acid deposition web page maintenance ongoing.</p> <p>APCD funded mercury transport study with Desert Research Institute at Storm Peak Lab and acid deposition/AQRV related lake sampling by USGS.</p>

Goal 5.6.2: Achieve levels of air quality in Colorado that protects the integrity of the natural ecosystem.

The key strategic targets to achieve this goal include: implementation of Acid Deposition Program

Implementation of PSD program, implementation of CFC control programs, development and implementation of cross-media programs to reduce Mercury and, encouragement, where appropriate, of voluntary emission control activities to reduce Greenhouse Gas Intensity.

<p>Sub goal 5.6.2.1: Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.</p> <p>Sub goal 5.6.2.2: Stratospheric ozone protection – Ensure programs to control CFC compounds are maintained.</p> <p>Sub goal 5.6.2.3: Climate change – Ensure climate change issues are identified and Governor’s Greening Government Programs are implemented .</p> <p>Sub goal 5.6.2.4: Protect environment from Mercury contamination –</p> <p>EPA 2003-2008 Strategic Plan Consistent Objective – Protect Ozone Layer and reduce Greenhouse Gas Intensity</p>		
Program objective	Planned Performance measures	Current status & accomplishments
5.6..2.1.1.1 Ensure acid rain minimized through operation of construction and operating permit programs	Permits issued to utilities	Described in Goal 1
5.6..2.1.1.2 Ensure acid deposition emissions are minimized through testing and evaluation of industrial sources	Conduct stack testing, source audits and CEM certifications for utilities Evaluate excess emission reports for utilities	Described in Goal 1
5.6.2.1.1.3 Ensure acid rain minimized though updates to Regulation No.18 as necessary	Revised regulation	Regulation updated as needed

<p>Sub goal 5.6.2.1: Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.</p> <p>Sub goal 5.6.2.2: Stratospheric ozone protection – Ensure programs to control CFC compounds are maintained.</p> <p>Sub goal 5.6.2.3: Climate change – Ensure climate change issues are identified and Governor's Greening Government Programs are implemented .</p> <p>Sub goal 5.6.2.4: Protect environment from Mercury contamination –</p> <p>EPA 2003-2008 Strategic Plan Consistent Objective – Protect Ozone Layer and reduce Greenhouse Gas Intensity</p>		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.2.1.4 Support technical assessment of Mt. Zirkel AQRVs	<p>Process coordination and communication with EPA, USFS and USGS Develop a plan for assessing the ecological impacts of acid deposition in the State, especially as it may impact vulnerable, acid-sensitive ecosystems, with attention to possible cause-and-effect relationship between emission sources and impact areas.</p> <p>Support installation of Buffalo Pass SO2 monitor</p> <p>Conduct additional data analyses on Mt. Zirkel</p> <p>Respond to any format triggering of AQRV law</p> <p>Prepare report on Mt. Zirkel analyses and comparative studies</p>	<p>Meeting with USGS, EPA and USFS held Summer '08 to plan next round of analytical assessments of the combined emission reductions from Hayden and Craig power plants. One more year of data collection agreed to prior to joint project to analyze emission reduction effects on Mt. Zirkel Wilderness Area.</p> <p>Buffalo Pass SO2 will continue thru Fall 2009.</p>
5.6.2.1.5 Support AQRV studies in Colorado	<p>CDPHE acid deposition web page</p> <p>Coordinate funding and communication between federal agencies and state</p>	Colorado continue to work with the WRAP along with other agencies and states in regard to the AQRV studies.
5.6.2.1.6 Implementation of Rocky Mountain National Park Initiative	<p>- Draft Nitrogen Deposition Report presented to Air Commission including initiatives in several areas</p> <p>- Agricultural outreach program focusing on Best Management practices implemented</p> <p>- Contingency plan developed</p>	<p>Developing an ammonia inventory for agricultural sources</p> <p>Cooperating with WQCD in developing Section 319 program</p> <p>Continued discussion with other agencies on contingency measures for Plan</p>
Sub goal: Ensure stratospheric ozone protection		

<p>Sub goal 5.6.2.1: Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.</p> <p>Sub goal 5.6.2.2: Stratospheric ozone protection – Ensure programs to control CFC compounds are maintained.</p> <p>Sub goal 5.6.2.3: Climate change – Ensure climate change issues are identified and Governor’s Greening Government Programs are implemented .</p> <p>Sub goal 5.6.2.4: Protect environment from Mercury contamination –</p> <p>EPA 2003-2008 Strategic Plan Consistent Objective – Protect Ozone Layer and reduce Greenhouse Gas Intensity</p>		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.2.2.2.1 Support protection of stratospheric ozone through update to state CFC and climate change inventories	Updated CFC usage inventory for Colorado	Ongoing
5.6.2.2.2.2 Protect stratospheric ozone levels through minimizing emissions of CFCs from applicable sources	<p>Equipment registration</p> <p>Inspections (both state and local agencies)</p> <p>Training and outreach (including pollution prevention)</p> <p>Facility Notification registration</p>	<p>4,634 registrations</p> <p>1,626 inspections</p> <p>12 trainings</p> <p>2,688 facility notifications</p>
Cross-media programs		
5.6.2.3.1 Ensure man-made climate change impacts minimized	<ul style="list-style-type: none"> <li>- Updated greenhouse emissions inventory for Colorado</li> <li>- Implement Governor’s Executive Order regarding Greening Government</li> <li>- State fleet use of hybrids and flex fuel vehicles</li> <li>- E85 technical analysis</li> <li>- Action Plan for alternative commute programs developed</li> </ul>	<p>Emissions inventory updated</p> <p>Greening government implementation continues for fleet vehicles and commuter travel</p> <p>E85 Technical review completed</p> <p>Governor’s Action Plan being implemented</p> <p>Additional Climate change staff being secured</p>

Sub goal 5.6.2.1: Protect environment from acid deposition damage - Ensure all Class I areas are protected from acid deposition impacts and other Air Quality Related Values are protected.

Sub goal 5.6.2.2: Stratospheric ozone protection – Ensure programs to control CFC compounds are maintained.

Sub goal 5.6.2.3: Climate change – Ensure climate change issues are identified and Governor's Greening Government Programs are implemented .

Sub goal 5.6.2.4: Protect environment from Mercury contamination –

EPA 2003-2008 Strategic Plan Consistent Objective – Protect Ozone Layer and reduce Greenhouse Gas Intensity

Program objective	Planned Performance measures	Current status & accomplishments
5.6.2.4.1 Colorado Mercury Initiative developed through cross-media programs	CDPHE Strategic Programming process (see discussion in Chapter 2 of PPA Assist the Water Division development of Mercury TMDLs and ongoing assessment of emissions and deposition.	Most of the activity in this area is now under the env. Integration and Sustainability Program

Goal 5.6.3: Achieve a level of ambient air quality that protects and preserves standards for visibility and aesthetic concerns for pollutants that cause odors.

The key strategic targets to achieve this goal include: the continued implementation of Maintenance SIP revisions for Nonattainment Areas (specific strategies to reduce visibility impairing pollutants); the implementation of community-based programs; ongoing state permit and compliance programs; the development of a Regional Haze SIP with other states; and, encouragement, where appropriate, of voluntary emission control activities.

5.6.3.1a Urban Visibility (Denver AIR Program Area and Fort Collins) – Ensure a decrease in the number of days the Colorado Visibility Standard is exceeded in the areas of applicability		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.3.1a.1 Reduce pollutants causing haze through the operation of mobile source strategies: Reg. No. 11 – A.I.R. Program Reg. No 12 – Diesel Inspection Smoking vehicles Clean fuels	Described earlier	See narrative in earlier sections

5.6.3.1a.2 Reduce pollutants causing haze through the operation of the stationary sources program objectives Operation of Construction and Operating Permit Programs Small Business Assistance Program Compliance monitoring and enforcement of stationary sources Wood burning Control Program – High Pollution Advisory Program and state and local woodstove regulations	Described earlier in work plan	See narrative in earlier sections
5.6.3.1a.3 Support reduction of haze-causing pollutants through regulation updates	Described earlier in work plan	See narrative in earlier sections
5.6.3.1a.4 Track program indicators through urban haze monitoring, inventories and modeling	Operate visibility monitoring network in Denver and Fort Collins (transmissometer and camera) High Pollution Day Forecasts in Winter Sample speciation and CMB modeling	<p>Visibility monitoring continues in Denver and Fort Collins, using both transmissometers and nephelometers. In addition, a visibility web cam was installed in Rifle in June 2008.</p> <p>High Pollution Day forecasts continue in the winter months and Ozone forecasts in the summer months.</p> <p>Chemical speciation of high PM days continues to occur annually each spring.</p>

	<p>Operate and maintain gaseous/continuous sites statewide</p> <p>Special Particulate Studies for Attainment Areas and Regarding - Ambient Measurement Techniques.</p> <p>Operate and Maintain Meteorological Monitoring Equipment Operate Denver Visibility Cameras</p> <p>Air Quality Forecasting and Air Quality Index (AQI) Reporting</p>	<p>Air monitoring around Colorado continues at approximately 60 different sites. All monitoring is being performed in accordance with 40 CFR 58 requirements and in accordance with the approved QAPP.</p> <p>Meteorological monitoring is ongoing.</p> <p>The visibility camera at the Thornton Civic Center continues to operate, with three daily photos being taken. The camera is now a digital unit instead of a 35mm film unit. The webcamera at the DESCI visibility site continues to operate and upload to the Technical Services Program website.</p> <p>The APCD issues daily air quality forecasts during the winter months; a "red" forecast triggers the mandatory residential burning curtailment activities. In addition, summer ozone forecasts were issued on a daily basis, in conjunction with the RAQC.</p>
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5.6.3.1b Regional Haze (for National Parks and Class I Wilderness areas) – Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development of a Colorado Regional Haze SIP revision		
Program objective	Planned Performance measures	Current status & accomplishments

5.6.3.1b Regional Haze (for National Parks and Class I Wilderness areas) – Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development of a Colorado Regional Haze SIP revision		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.3.1b.1 Continue Colorado Regional Haze SIP development process	<p>Complete technical support document for Colo. SIP submittal including analysis of IMPROVE data at Class I sites; updating emissions inventories and modeling analyses for 2018 and development of source attribution tools and techniques August 2007</p> <p>Policy work will include: development of Colo SIP with language consistent with EPA Rules and other EPA RH requirements; continued implementation of BART determinations; and, continue to implement and work toward an updated Long Term Strategy to meet RH Rule requirements</p> <p>Conduct public hearing on Colorado Regional Haze SIP November 2007</p>	<p>Air Division submitted BART/LTS/TSD to EPA in June 2008 following Dec. 2007 AQCC adoption.</p> <p>APCD promulgated two remaining BART determinations in Dec. 08.</p> <p>APCD will complete final remaining part of RH SIP in 2009.</p>
5.6.3.1b.2 Support Class I Attributable Visibility Impairment Visibility SIP	<p>Analyze trends in Zirkel IMPROVE data and precipitation chemistry data to assess the impacts of new controls at Craig and Hayden power generation facilities</p> <p>Assemble and analyze IMPROVE monitoring data using statistical methods such as factor analysis, trajectory models, and chemical mass balance models. Develop computer programs to assist with processing of improve data for analysis</p> <p>Provide technical assistance to various visibility workgroups as requested</p> <p>Continue to work resolve certification issues</p> <p>Three-year review of federal land manager activities as required by SB 17 developed</p> <p>Participate in SIP calls</p>	<p>An assessment was completed last year. The results have been posted on the Divisions web site</p> <p>A Technical Support Document has been completed for each Class I area and has been posted to the Division's Regional Haze web page.</p> <p>Air Division continue to work with WRAP technical committees.</p> <p>SB17 review has not been initiated at this time.</p>

5.6.3.1b Regional Haze (for National Parks and Class I Wilderness areas) – Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development of a Colorado Regional Haze SIP revision		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.3.1b.3 Complete Class I Area analyses for RH SIP development	Develop Class I area analyses to define base line conditions (2000-2004), haze reconstruction, and source apportionment for all Class I areas in state for that period	A Technical Support Document has been completed for each Class I area and has been posted to the Division's Regional Haze web page
5.6.3.1b.4 AQRV monitoring for Mt. Zirkel	Maintain close coordination with the USFS, EPA, and USGS Maintain ongoing communication with stakeholders and the public Support of the Buffalo Pass SO2 monitor installation. The Division will perform 2 calibrations/year and 1 audit/year Support of snow pack sampling in the Zirkel area through annual contract with USGS Keep current on AQRV Zirkel-related work by other agencies	RAVI/Phase I LTS Review and SIP Revision completed and forwarded to EPA in 2008 as part of Regional Haze SIP package.

5.6.3.1b Regional Haze (for National Parks and Class I Wilderness areas) – Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development of a Colorado Regional Haze SIP revision		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.3.1b.5 Continue implementation of effective fire and smoke management and prescribed fire program	<p>Update 3-year vision of the SMP</p> <p>Every 6 months review and post SMP priorities on web site</p> <p>Review permit applications and revisions in less than 30 days.</p> <p>Maintain current information on burn activity/produce annual emission and activity report.</p> <p>Present, train, and participate in structured discussions as needed: Greeley Academy, Rx410, federal rx season wrap-up meeting, Prescribed Fire Council in an observer role, CSU fire management class.</p> <p>Visit &amp; report on all urgent field situations; most new burners; 50%(+) each of selected priority burns and permittees, and burns with non-standard conditions.</p> <p>Maintain SMP web page and explore/develop capability for web-based permit forms.</p> <p>Work with local communities and partnerships to address wildland fuels treatment as needed</p>	<p>3-year vision of the Smoke Management Plan (SMP) was completed and posted to web site in Winter 2008.</p> <p>Every 6-month priority list completed on schedule.</p> <p>All permit applications reviewed prior to 30 day limit.</p> <p>Annual emissions and activity report completed for 07.</p> <p>SMP staff have participated/taught at appropriate forums about Colorado's program and smoke management.</p> <p>SMP and TSP staff continue to explore options for web-based permit forms.</p> <p>All site visit criteria met during permit process.</p>
5.6.3.1b.6 Track program effectiveness indicators through haze monitoring, inventories and modeling	Every 5-year update required of Regional Haze SIP via public hearing and submittal to EPA	SIP approved by Commission in 2007, submitted to EPA in 2008. Update required 5 years in future. Annual review of inventories and IMPROVE monitoring is ongoing.

5.6.3.1b Regional Haze (for National Parks and Class I Wilderness areas) – Ensure natural background visibility conditions in all Mandatory Class I Areas by 2064 through the development of a Colorado Regional Haze SIP revision		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.3.1b.7 Participate in Four Corners Task Force and other areas to assess additional measures to meet 308 Rule requirements including: - impact of oil and gas development on regional haze and other areas - other measures as identified	Participate in Four Corners Task Force with EPA, FLMS, New Mexico and other stakeholders: - Complete work on Task Force Report and disseminate findings and recommendations	The Four Corners Task Force has completed all tasks and a final report has been developed.

5.3.3 Aesthetic problems caused by odor pollution by ensuring all odor problems are addressed as expeditiously as practicable		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.3.2.1 Reduce pollutants causing odors through the operation of mobile source strategies: Regulation No. 11 – A.I.R. Program Reg. No. 12 – Diesel Inspection Smoking vehicles Clean fuels	Described earlier	Ongoing activity
5.6.3.1a.2 Reduce pollutants causing odors through the operation of the stationary sources program Operation of Construction and Operating Permit Programs Small Business Assistance Program Compliance monitoring and enforcement of stationary sources Wood burning Control Program – High Pollution Advisory Program and state and local woodstove regulations	Described earlier in work plan	Odors addressed on a complaint basis. Worked with COGCC to address odors from oil and gas sources.  Compliance with Regulation No. 2 required on a case-by-case basis in permits.  Activities described earlier apply. Permit reviews identify problems and seek solutions during process
5.6.3.1a.3 Support reduction of odor pollutants through regulation updates	Described earlier in work plan	Odor complaints and resolution tracked through field services.

5.3.3 Aesthetic problems caused by odor pollution by ensuring all odor problems are addressed as expeditiously as practicable		
Program objective	Planned Performance measures	Current status & accomplishments
5.6.3.1a.4 Track odor program indicators through compliance monitoring	Maintain complete complaint records and their resolution Coordination of compliance record-keeping with local agencies	Described earlier in work plan



## 6.0 Water Quality Control Division FY 2007-2008

### 6.1 Mission

The Water Quality Control Division (Division) has the challenging and legally mandated responsibility of maintaining, restoring and improving the quality of the state's waters and assuring that safe drinking water is provided from public water systems for the people of the state. In short, the Division's mission is to ensure that the state's waters attain and maintain that level of water quality necessary to protect designated beneficial uses and that all public water systems consistently provide safe drinking water. In order to meet these responsibilities, Division staff implements delegated programs authorized by the Clean Water Act (CWA), the Safe Drinking Water Act (SDWA), and Colorado statutes.

### 6.2 Clean Water Act Program

A complete Clean Water Program consists of the following strategic functional elements: ambient water quality monitoring; water quality assessment; standards development (e.g. providing scientific support for adoption of standards and other control regulations by the Water Quality Control Commission (WQCC); water quality management planning and Total Maximum Daily Load (TMDL) development; control mechanisms (including permitting, facility siting approval), engineering plan review and approval; compliance assistance (including facility planning and financial assistance); compliance assurance (including evaluation of self reported data, compliance sampling inspections, facility inspections and enforcement); and water quality restoration and enhancement efforts.

### 6.3 Safe Drinking Water Act Program

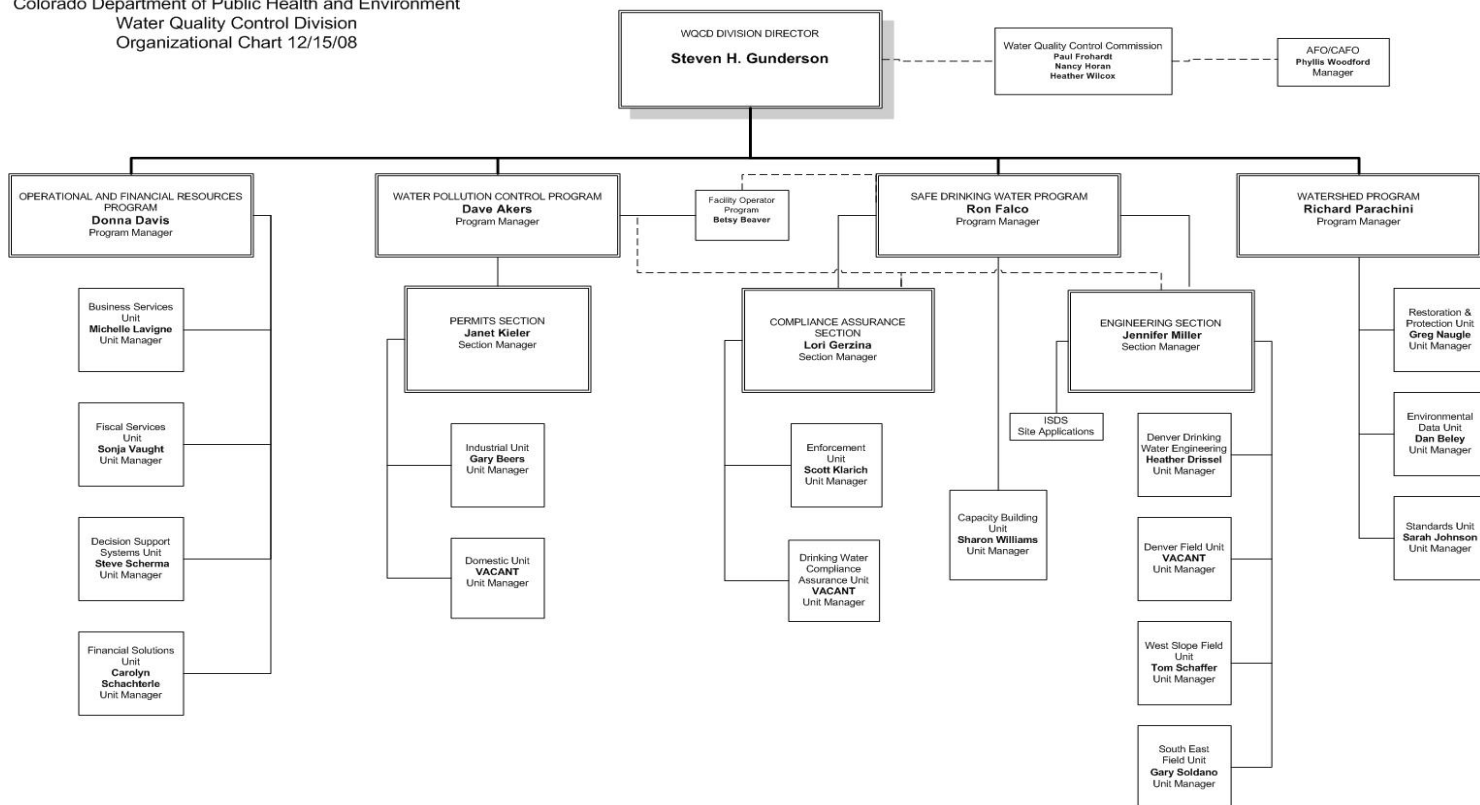
The Safe Drinking Water Program, which has historically been viewed as a separate entity from the Clean Water Program, is nonetheless, composed of similar program elements requiring staff with much the same underlying professional and technical expertise. Drinking Water Program strategic functional elements include: source water protection; regulatory development (i.e., developing treatment standards and performance requirements for public water systems for adoption by the Water Quality Control Commission); control mechanisms (i.e., ensuring public water systems comply with promulgated treatment standards); data management; compliance assistance (including engineering plan review, sanitary surveys, capacity development, technical assistance and financial assistance); compliance assurance including compliance surveillance monitoring and compliance inspections (i.e., sanitary survey follow-up); and formal enforcement using civil or criminal authorities as appropriate.

### 6.4 Division – Organizational Structure

The Division, in total, consists of the following organizational units, which address in Colorado all of the above strategic functional elements of ambient water quality management under authority of the CWA and the provision of safe drinking water under the authority of the SDWA. Figure 6.1 shows the Division's current organizational chart. Table 6.1 describes the goals of each organizational element.

**Figure 6.1 WQCD Organizational Chart**

Colorado Department of Public Health and Environment  
Water Quality Control Division  
Organizational Chart 12/15/08



## **6.5 Division Challenges for FY 2007-2008**

### **The Regulated Community**

The size of the regulated community for which the Division is responsible is daunting. For example, there are over 100,000 stream miles in the state with designated water uses and standards assigned to them. The Division has issued over 2400 water discharge permits to municipalities and industries and approximately 5000 storm water permits. There are nearly 2000 active public drinking water systems in Colorado, with 20% of these systems serving 80% of the population. Colorado has drinking water systems and wastewater treatment systems in parts of the state where they didn't exist a generation ago. In addition, new federal requirements, both with respect to the Clean Water Act and Safe Drinking Water Act, have imposed challenges on both the Division and its regulated community. Small communities with resource limitations present especially difficult challenges meeting these requirements.

#### **How Does the Division Address These Challenges?**

- Compliance Assistance. The Division helps dischargers and water systems by answering regulatory and technical questions, conducting training, etc.
- With respect to dischargers, there are a variety of regulatory processes that can provide time to comply, including Temporary Modifications to standards and compliance schedules in permits.
- Enforcement when necessary.
- Dischargers can seek site-specific standards based on local conditions.
- Low Interest and Zero Interest Loans through the Power Development Authority. One concern here is that the federal contribution to the Water Pollution Control Revolving Fund has been cut by Congress by approximately 50% in 3 years.
- State Grants. In 2006, the Legislature restored \$1.5 million to both the State Wastewater and Drinking Water grant programs, but they were eliminated again in 2007.
- Source Water Protection. Colorado is blessed by being the headwaters for most of the nation. As development occurs at higher elevation and elsewhere in the state, efforts in communities, with the help of the Division to protect the watershed of drinking water systems is being accelerated.
- Water Quality Improvement Fund. State House Bill 06-1337 established a fund for addressing various water quality issues, including providing grants for storm water projects, designing, construction, or upgrades of domestic wastewater treatment plants, and non-point source projects. The Fund consists of penalties collected as a result of violations in accordance with the Colorado Water Quality Control Act.

### **Resource Needs for the Division**

State Senate Bill 03-276 required that the Division consult with the WQCC, BOH and interested parties in addressing a list of identified questions that addressed implementation of the Clean Water Act and Safe Drinking Water Act at the State level. After an extensive outreach and stakeholder process, the Division issued the SB 276 Report, which answered the identified questions and also projected a resource gap between the Division's available staffing and resources at the time and what was needed to fulfill that gap in demand. In the 2006 and 2007 legislative sessions, the legislature provided a total of 22 FTE (10 drinking water, 12 clean water) using a combination of fee and general funds.

TABLE 6.1

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
<b>1. Ambient Water Quality Monitoring – Monitor chemical, physical and biological conditions of all state surface waters so that water quality decisions are well supported with adequate data.</b>			
1.1 Monitor chemical, physical and biological conditions of all state surface waters so that water quality decisions are well supported with adequate data.	1.1.1 Conduct monitoring for all basins to support triennial reviews.	1.1.1.1 Chemical data will be managed in local STORET for use in basin-wide assessments.	1.1.1.1 All chemical data collected is being uploaded into the STORET database and is available for use in basin assessments.
	1.1.2 Pursue and continue development of a statewide ambient ground water monitoring plan.	1.1.2.1 Continue to sample ambient ground water.	1.1.2.1 Ambient groundwater was sampled in SFY 2008 with financial support from the FY 2008 Section 106 Categorical grant Monitoring Initiative.
<b>1.2 Development and Implementation of a Comprehensive Monitoring Strategy.</b>			
1.2.1 Number of states and territories that have adopted and are implementing their monitoring strategies [The 10 Elements] in keeping with established schedules (FY07 WQ7; FY08 WQ5T).	1.2.1.1 a) Continue implementing Colorado's Water Quality Monitoring and Assessment Strategy (The 10 Elements) 2004-2014. b) Develop updated version of The 10 Elements strategy for EPA (initial strategy approved in 2005). c) Develop annual feedback loop with EPA R8 to report/discuss progress of The 10 Elements implementation. d) Target data flow and QA/QC for major improvement this grant period.	1.2.1.1.1 a) Enhanced annual monitoring plan fully implemented by June 30, 2007. b) Update of The 10 Elements during Fall 2007. 2007 revision submitted to EPA. c) Annual feedback loop with EPA R8 [on The 10 Elements] in place by mid-year update. d) Electronic data flow improvement between WQCD, LSD (lab), and STORET ongoing. e) Upload state water quality data into national STORET warehouse by 9/30/07. f) Participate in the transition efforts from STORET to the Water Quality Exchange (WQX). g) Updated state QA/QC (QMP/QAPP/SAAP) policies and	1.2.1.1.1 a) An enhanced annual monitoring plan was implemented by June 30, 2007. The 10 Elements document and the Section 106 Categorical grant are used to guide these enhancements. b) The 10 Elements were updated in SFY 2007 and submitted to EPA for review. c) Communication and coordination with EPA on 10 Elements and other topics has improved in SFY 2007 and continued into FFY 2008. d) Electronic data flow improvements continue to be made. The WQCD now has electronic access to analyses from the LSD; one of the EDU

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		procedures by 6/30/2008.	<p>staff has worked at and made improvements in the procedures for populating STORET in a timely and effective manner and the WQCD is involved at the national and local level in preparing for the transition to WQX. Colorado has arranged for a local "STORET" database which will be EQUIS. We expect that this system will facilitate even more data management flexibility.</p> <p>e) Colorado is on schedule with its water quality data into the national STORET data warehouse for all deadlines.</p> <p>f) Colorado is actively in transition efforts to the WQX. This includes negotiations with the Colorado Data Sharing Network to transition their system to WQX as well.</p> <p>g) Colorado's QMP and QAPP have been updated and have been submitted to EPA for signature. These updates were both finished in the Spring 2008.</p>
1.2.2 Develop categorical grant application and workplan for the FY07 Monitoring Initiative to advance specific portions of The 10 Elements strategy. Coordinate with EPA staff to develop categorical grant application for the FY08 Monitoring Initiative.	1.2.2.1 a) Develop detailed Monitoring Initiative workplan. b) Training for 5-6 staff in Rosgen Classification of Natural Rivers to expand scope of physical habitat data. c) Determine risks associated with consuming fish contaminated with	1.2.2.1.1 a) Workplan developed in Fall 2006. b) Training conducted to implement grant. c) FY07 Monitoring Initiative tasks completed by Sept 30, 2007. d) Conduct prescribed QA/QC for Objectives a-e.	<p>a – e) All tasks completed as planned.</p> <p>f) The workplan and application for the FFY 2008 grant was completed and submitted to EPA in the winter of 2007.</p>

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	selenium. d) Additional laboratory analyses of stream and reservoir water samples to expand scope of chemical and biological data. e) Ambient ground water monitoring for classified GW specified areas to expand scope of GW data. f) Develop specific QAPP/SAAP protocols to ensure that work conforms to overall state QMP procedures.  (See separate categorical grant for more details.)	e) Summarize results in annual 305(b) Report. f) Workplan and application for FFY08 Monitoring Initiative in Fall / Winter 2007.	
1.2.3 Develop a categorical grant application and conduct FY07 Lakes Probabilistic Survey. Develop a categorical grant application for FY08 and conduct FY08 Flowing Waters Probabilistic survey.	1.2.3.1 a) Develop detailed Lakes Probabilistic Survey workplan. b) Develop and implement Sampling and Analysis Plan for a two-person crew to sample the 30 lakes identified by EPA for the Survey. c) Develop specific QAPP/SAAP protocols to ensure that work conforms to overall state QMP procedures.  (See separate categorical grant for more details.)	1.2.3.1.1 a) Training conducted to implement grant b) Lakes Probabilistic Survey completed by Sept 30, 2007. c) Conduct prescribed QA/QC for Objective a and b. d) Flowing Waters Probabilistic survey completed in 2008 & 2009.	1.2.3.1.1 All work for the Lakes Probabilistic Survey completed via a contract with the USGS  d) The first half of the Flowing Waters Survey was completed in FFY 2008 with an 'In Kind Services' agreement with the EPA.
1.2.4 Assist in developing a comprehensive statewide wetland program strategy.	1.2.4.1 Participate in the development a comprehensive statewide wetland program strategy with EPA and the other state "implementing agencies."	1.2.4.1.1 Follow-up meetings scheduled by EPA such that roles and responsibilities of the various state and federal agencies are clarified and a comprehensive statewide program is developed.	1.2.4.1.1 Colorado continues to participate with EPA in its efforts to develop a wetlands program.
2. Water Quality Assessment and Standards Development – Assess quality of state waters to support decision-making.			

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
<b>2.1 Assess Whether Fish are Safe to Eat</b>			
2.1.1 Percentage of lake acres & river miles where fish tissue will be assessed to support waterbody-specific or regional consumption advisories, or a determination that no consumption advice is necessary (FY07 FS-2: FY08 FS1a and FS1b)	2.1.1.1 To monitor and assess fish tissue data for mercury, (and where relevant selenium and arsenic) from 10 waterbodies, (reservoirs, lakes and rivers) consistent with the annual state monitoring plan.	2.1.1.1.1 a) Include fish tissue data and assessment in annual Fish Tissue Study Report. b) Issue or rescind FCAs where appropriate. c) Update on National List of Fish Advisories.	2.1.1.1.1 a) WQCD FCA website updated regularly as information is developed. b) Fish consumption advisories have been added and deleted as information warrants. Approximately 19 FCAs in place as of end of FFY 2008. c) Participated in the update of the national List of Fish Advisories as requested by EPA.
<b>2.2 Assess Quality of State Waters to Support Decision Making and Document Changes Over Time</b>			
2.2.1 Protect and Improve Water Quality on a Watershed Basis -  By 2012, improve water quality conditions in 250 impaired watersheds nationwide using the watershed approach (cumulative). (FY07 PAM 2.2.1; FY08 SP-12)	2.2.1.1 a) River, stream and lake segmentation will be available in a GIS environment b) Determine the distribution of water quality standards impairment by watershed c) Information from the 303(d) lists and M&E Lists will be managed in a Database that can be linked to GIS information. d) (Supplements 2.2.1 SP-10, SP-11, SP-12) Identify 6 potential water bodies to be monitored for the improvement or restoration of water quality to the applicable standards and uses. e) (Supplements 2.2.1 SP-10, SP-11, SP-12) Assess 3 water bodies for the improvement of restoration of water quality to the applicable standards and uses.	2.2.1.1.1 a) Maintain linkage between database for 303(d) and M&E List Information and reach indexed NHD coverage. b) If EPA funds are made available, coordinate with EPA and Forest Service to carry out data analysis and additional monitoring as needed to measure improvement and determine current water quality status in at least 3 waterbodies. c) Assess 3 waterbodies to determine water quality improvement or standards attainment.	2.2.1.1.1 a) Colorado continues to work with EPA to make the reach indexed NHD coverage as complete and accurate as possible. b) This task was completed. <u>Arkansas Basin</u> COARLA01a (Fe, trec) COARLA04 (Fe, trec) COARMA02 (Se) COARMA03 (Se) COARMA04a (Se) COARMA05 (Se) COARMA06 (Fe, trec) COARMA13 (Se, f. coliform) COARUA14b (Hg-based FCA) <u>Gunnison Basin</u> COGULG02 (temp) Rio Grande Basin

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
			COGRCB09a (Ag, Pb, pH) COGRCB09b (Cd, Zn) <u>South Platte Basin</u> COSPCL02 (Pb) COSPUS05b (Cu)
2.2.2 Number and percentage of waterbodies identified in 2000 as not attaining standards where water quality standards are fully attained. (21,632 waterbodies; 255,408 miles and 6.8 million acres) (FY07 Measure L; FY08 SP-10)	2.2.2.1 Document water quality improvement over time.	2.2.2.1.1 Using the tools developed in Activity 2.2.1, by 9/30/08; determine how many of the impaired segments from the 1998 303(d) list are fully attaining water quality standards as of 4/1/08 (the data cutoff for the 2006 List).	2.2.2.1.1 Impaired segments fully attaining standards in FY2008: COARUA0b (Pb, Mn, Zn) COARUA14b (Hg, FCA-based) COSJLP04 (sediment) COUCBL02 (Cd, Zn) COUCBL11 (pH, Cd, Zn)
2.2.3 Number of States, Interstate Agencies, and Territories that provide comprehensive integrated assessments of the condition of their waters consistent with sections 305(b) and 303(d) of the Clean Water Act and EPA's integrated assessment guidance. (56 State/Territories (FY07 WQ-10: FY08 None))	2.2.3.1 Provide consistent and accurate assessment of the State's surface waters and provide the information to EPA and the Public.	2.2.3.1.1 Develop Colorado's 2008 Section 303(d) Listing Methodology in an open and public process.	2.2.3.1.1 The Listing Methodology for the 2008 303d List was developed in a very open and public process which included holding numerous public meetings to discuss potential updates with stakeholders.
2.2.4 Utilize Assessment Database (ADB) and GIS to record monitoring and assessment decisions (FY07 WQ11; FY08 WQ7).	2.2.4.1 Continue to update ADB/GIS with assessment data.	2.2.4.1.1 Updated ADB and GIS by 4/1/08 (with Integrated Report)	2.2.4.1.1 The Colorado Integrated 2008 Integrated Report was completed and submitted to EPA by 4/1/2008 and included the necessary ADB and GIS updates.

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
2.2.5 Number of waterbodies identified by States in 2000 as being impaired by nonpoint sources or by both point & nonpoint sources that are fully restored (cumulative). [Estimated 6,264 waterbodies impaired solely or partially by nonpoint source (FY07 WQ-16; FY08 WQ10)]	2.2.5.1 a) Develop the ability to track impairment by source as well as pollutant. b) Identify candidate water bodies and document successes based on the 1998 303(d) list and subsequent 305(b) or integrated reports and complete nonpoint source projects.	2.2.5.1.1 a) Using the tools developed in Activity 2.2.1, by 9/30/08, determine the number of waterbodies that are being impaired by nonpoint sources or by both point & nonpoint sources. b) Submit a minimum of one draft success story for EPA consideration in FY2008 based on the 1998 303(d) list, with a target of a minimum of four draft success stories submitted by FY2012.	2.2.5.1.1 a) This activity is ongoing as part of TMDL development. b) A draft success story was submitted to EPA on 9/30/08 – “Box Canyon Creek Watershed Restoration Project.”
<b>2.3 Water Quality Criteria and Standards Development</b>			
2.3.1 Number of States & authorized Tribes that have completed a review of water quality standards within three years of the previous triennial review under Section 303(c) of the CWA. (56 State/Territories, & 22 authorized Tribes (FY07 WQ 5a; FY08 WQ3aT))	2.3.1.1 Continually review water quality standards and revise them if necessary in accordance with State and Federal statute and Water Quality Control Commission schedule.	2.3.1.1.1 a) Scoping Hearing Reg #38: 10/07 b) Formulation Hearing Regs #33 & 37: 11/07 c) Rulemaking Regs #33 & #37: 6/08 d) Scoping Hearing Reg #31: 10/08 e) Formulation Hearing Reg #38: 11/08 f) Rulemaking Reg #38: 6/09	2.3.1.1.1 Scheduled dates were met. a) Scoping Hearing for Reg #38 – 10/2007. b) Formulation Hearing for Regulations #33 & #37 11/2008. c) Rulemaking Hearing for the Water Quality Standards and Classifications for Regulations #33 and 37 6/2008. d) Prepared for the Scoping Hearing for Reg #31 in September 2008 (the hearing was outside the reporting period). e) Prepared for the Formulation Hearing for Reg #38 in September 2008 (the hearing was outside the reporting period). f) Rulemaking hearing for Regulation #38 is outside the reporting period

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
2.3.2 Number and percentage of states on schedule to adopt nutrient criteria into their WQS (FY07 WQ-2b; FY08 WQ 1bT)	2.3.2.1 Continue to implement the Nutrient Criteria Development Plan for Colorado September 26, 2002 Colorado Department of Public Health & Environment, or any revisions to this plan.	2.3.2.1.1 a) Update Nutrient Criteria Plan with revised milestone schedule for Lakes/Reservoirs and Rivers/Streams by 10/1/07. b) Submit revised plan to EPA and reestablish mutual agreement. c) Provide work products on the tasks identified in milestone schedule.	2.3.2.1.1 a) The Division completed the Nutrient Criteria Plan status report and revised miles stones in October 2007 and distributed it to EPA and Stakeholders. b) It was presented to the Commission in January 2008 and submitted to EPA. c) Continued to work in consultation with EPA to develop work products and meet the milestones. Quarterly stakeholder meetings were held.
2.3.3 Number of states that have adopted biocriteria used to determine use attainment or “incorporated in water quality programs to support determine of attainment”	2.3.3.1 To develop expected condition for aquatic life (biocriteria) for use in possible revisions to the aquatic life use classifications system and for assessing aquatic life use impairment.	2.3.3.1.1 Continue to work with technical experts and Region 8 with the overall state goal to consider revisions to the aquatic life classifications, at the 2010 RMH, based on expected condition for aquatic life (~biocriteria)	2.3.3.1.1 The Division continued to meet with stakeholders and EPA regarding nutrient criteria development. In consultation with EPA, and the technical experts, the augmented datasets were assembled to develop revised macroinvertebrate Multi Metric Index (from EMAP) and Observed / Expected models. We are on track to propose refined aquatic life use classes for consideration at the 2010 RMH.
3.0 Water Quality Management Planning and TMDL Development – Assure that the watershed approach becomes an effective organizing principle for improving water quality.			
3.1 Support the development and implementation of watershed restoration plans.			

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
3.1.1 Update 604(b) work plans with designated regional water quality planning agencies to support the watershed approach.	3.1.1.1 Support coordinated regional water quality planning in the four designated areas	3.1.1.1.1 Submittal of annual grant application and agency work plans to EPA for approval. Execution of purchase orders or contracts with planning agencies.	Updated plans were submitted to EPA by PPACOG, NWCCOG, DRCOG, NFRWQPA, and CDPHE. All 2008 grant funds have been contracted, 2009 grant funds are currently being processed.
3.1.2 Number of water segments known to be impaired or threatened based on Colorado 1998 303(d) list for which State and EPA agree that the waterbody is fully restored, partially restored, or initial restoration planning is complete. (FY07 WQ-33; FY08 SP-10, SP-11, WQ21)	3.1.2.1 Continued completion of restoration planning and implementation to improve water quality in waterbodies not attaining water quality standards.	3.1.2.1.1 a) Targeted number of water segments fully restored in FY08 (SP-10):8; b) Targeted number of water quality impairments restored in FY08 (SP-11):8; c) Targeted number of water segments for which water quality restoration planning is complete in FY08 (WQ-21):29.	a) Five segments fully restored in FY2008: COARUA0b (Pb, Mn, Zn) COARUA14b (Hg, FCA-based) COSJLP04 (sediment) COUCBL02 (Cd, Zn) COUCBL11 (pH, Cd, Zn) b) Three segments with impairments restored in FY2008: COARLA01a (Fe, trec) COGRCB09a (Ag) COGRCB09b (Cd, Zn) c) Segments for which water quality restoration planning is complete (submitted and approved in FY2008) COGUSM03a (Zn) COGUSM03b (Cd, Zn) COGUSM06b (Zn) CORGRG04 (Cd, Zn) CORGRG30 (Hg, FCA-based) COSJDO05 (Cd, Zn) COSPCL02 (Cu, Zn) COSPCL11 (Zn) COSPCL13 (Cd, Mn, Zn) COSPUS04 (Cu) COSPUS05b (Zn) COSPUS14 (f. coliform (E.

Water Quality Control Division Goals - Part I Clean Water Act

Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
			coli)) COUSBL06 (Cd, Cu, Pb, Zn) COSPBL07 (Cd, Cu, Mn) (submitted in FY2008, approval pending) COARUA02b (Cd, Zn) COARUA02c (Zn) COARUA11 (Al, Cu, pH) COARUA12a (Zn) COUCEA05 (Zn) COUCEA07 (Zn)
3.1.3 Number of impaired watersheds where water quality conditions improve (FY07 WQ-32 (I,R: FY08 SP-12))	3.1.3.1 Identify Hydrologic Unit Code (HUC) areas for designation as priority watersheds where a) improvements may be expected, and b) have been demonstrated.	3.1.3.1.1 a) Evaluate impaired water bodies and associated pollutants from 2002 303(d) impaired waters list; b) Identify water bodies from the 1998 303(d) list that have attained standards either by standards revisions or improvement of water quality; c) Develop priority ranking process for impaired water bodies identified in 3.1.3.1.1 a); d) Apply ranking process in 3.1.3.1.1 c) to impaired water bodies to identify potential priority areas; e) Compare potential priority areas to 10 and 12-digit HUC areas if provided by EPA Region VIII by September 1, 2007. f) Work with EPA Region VIII to identify potential priority 10 or 12-digit HUC watersheds. g) Work with EPA Region VIII to develop numeric commitment of watersheds where water quality	3.1.3.1.1 (a-g) Completed in FY2006-07. h) Priority watersheds identified in FY2007-08 for evaluation: Peru Creek, Eagle River, Boulder Creek, Clear Creek, Saint Vrain River, Upper South Platte, Uncompahgre River, Upper Gunnison River, Dolores River, Mancos River, Arkansas River, Purgatoire River, and Kerber Creek.  Four water success stories will be submitted annually through 2012. The 2008 success story was – “Box Canyon Creek Watershed Restoration Project.”  No additional priority watersheds identified in FY2007-08.

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		conditions improve for inclusion into the 2007-08 PPA by September 30, 2007. h) Update list as necessary.	
3.1.4 Improve water quality conditions in impaired watersheds nationwide using the watershed approach (cumulative) (FY07 WQ32: FY08 SP-12). By 2012, improve water quality conditions in 250 impaired watersheds nationwide using the watershed approach (cumulative). (FY07 PAM 2.2.1; FY08 SP-12)	3.1.4.1 Identify 10 or 12-digit HUC watersheds where improvements have been demonstrated.	3.1.4.1.1 a) FY08 – 1 watershed b) FY12 – tentative target of 4 watersheds. (Target is cumulative from FY2008 through FY2012)	3.1.4.1.1 A draft success story was submitted to EPA on 9/30/08 – “Box Canyon Creek Watershed Restoration Project.”
3.1.5 Number and national percent of approved TMDLs that are developed by States or EPA on a schedule consistent with national policy (FY07 WQ-13a & 13b: FY08 WQ-8a & 8bT)	3.1.5.1 Continue to develop TMDLs for Colorado’s impaired waters in accordance with EPA guidance and State policy.	3.1.5.1.1 Submit approximately 30 TMDLs for approval by EPA between 7/1/07 and 6/30/08.	3.1.5.1.1 Sixty-seven (67) TMDLs were submitted for approval between 7/1/07 and 6/30/08. Fifty-one (51) were approved within the same time frame.
<b>4.0 Permits Program - Colorado shall fully implement and enforce its delegated NPDES program including, as appropriate its general permitting.</b>			
4.1 Complete a comprehensive assessment of NPDES program integrity and, as appropriate, establish an implementation schedule.	4.1.1 State specific commitments will be negotiated in support of Permitting for Environmental Results	4.1.1.1 Where appropriate, involve EPA in the comment process for changes in CDPHE regulation/ policy affecting its delegated NPDES permitting program.	4.1.1 No state-specific commitments were included in the PPA.  4.1.1.1 WQCD involved EPA in the process of revising the discharge permit regulations and implementation policies (i.e., Low Risk Guidance)
<b>4.2 Issue Process Water Permits</b>			

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
<p>4.3 Percentage of all NPDES permits that are considered current and the percentage of high priority permits that are also current.</p> <p>The FY07 EPA PAM WQ-19 is 90% of all NPDES permits will be current. CDPHE and EPA agree this target will be re-evaluated in year 2 of the agreement. For FY08 the PAM Codes are WQ-12a and WQ-19a</p>	<p>4.3.1 90% of all permits (including non-storm water general permit certifications) are current. 95% of the priority permits targeted for issuance are current as of the end of each federal fiscal year. An exception is when there are less than 20 priority permits; all but one priority permit will be issued. If the number of expired permits is greater than 30% at any time, Colorado shall provide an overall permit issuance/backlog reduction plan showing how the state will expeditiously reduce the backlog to 20%.</p>	<p>4.3.1.1 For FY08, the Division will update EPA's Permit Management Oversight System (PMOS) for priority permits and non-storm water general permits. EPA will use PCS information for individual non-storm water permit counts.</p>	<p>4.3.1. As of October 1, 2008 (includes process water individual permits, process water general permit certifications, CAFO individual permits, CAFO general permit certifications, and storm water individual permits) 83.2% * of permits counted in backlog were current.</p> <p>The total universe of permits was :</p> <ul style="list-style-type: none"> <li>a) 354 process water individual permits,</li> <li>b) 1,337 process water general certifications,</li> <li>c) 11 CAFO individual permits,</li> <li>d) 40 CAFO general permit certifications,</li> <li>e) 6 storm water individual permits.</li> </ul> <p>*1407/1691 = 83.2%</p> <p>As of October 1, 2008, 21 of 21, or 100% of FY 2008 priority permits were issued.</p>
	<p>4.3.2 Develop and submit the Priority Permit List for the federal fiscal year to EPA by October 1 of each year. For FY08 the Division will update and submit the Priority Permit List in EPA's PMOS database by the deadlines provided by EPA Region VIII.</p>	<p>4.3.2.1 For FY08 the Division will update EPA's PMOS database regarding priority permit issuance dates.</p>	<p>4.3.2 The Division developed and maintained a list of priority permits in PMOS in coordination with EPA.</p>

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
4.4 Number of dischargers with permits providing for trading between the discharger and other water pollution sources and the number of dischargers that carried out trades.		4.4.1.1 Report: a) Number of permits that provide for trading between the discharger and other water pollution sources; b) Number of dischargers that carried out a trade.	OUTCOME: There are 40 - 60 permits for discharges to waters addressed in control regulations (i.e., Phosphorous, salinity).  4.4.1.1 a) No permits provide for trading b) No dischargers carried out a trades involving phosphorus in discharges at domestic WWTFs within the same watershed.
This PAM has been dropped for FY 08			
4.6 - Implement state CAFO regulations.			
4.7 Implement the Unified National Strategy for Animal Feeding Operations - March 9, 1999 to the maximum extent possible.	4.7.1 Implement the State's program to address animal feeding operations that are impacting water quality.	4.7.1.1 Provide progress report on implementation to EPA at end of year.	The Ag Program evaluates small and medium AFOs on an ongoing basis for impacts on water quality. The program does this through complaint response (site visits, follow up and enforcement, if applicable) and review of WQCD watershed assessment information. AFOs are required by state law to comply with best management practices to minimize discharges of wastewater and manure to waters of the state.
4.8 CAFO Inspections and Reporting.	4.8.1 Complete CAFO inspections in accordance with Colorado's Inspection Plan for the period of October 1-September 30 of each year.	4.8.1.1 Submit to EPA, by December 31 <sup>st</sup> and June 30 <sup>th</sup> of each year*, an electronic copy of the CAFO inventory and/or database. *EPA can request an electronic copy of the most recent CAFO inventory at any time throughout the year.	All CAFO inspections were completed by July 1, 2008.  Electronic version of CAFO inventory submitted to EPA in June 2008 and December 12, 2008.

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		4.8.1.2 Submit to EPA, by December 31 <sup>st</sup> and June 30 <sup>th</sup> of each year, an inspection status report explaining the progress made toward inspecting CAFOs and progress toward inventory development.	<p>Inspection status for IY08 - complete.</p> <p>Copies of all IY08 CAFO inspections were submitted electronically to EPA in June 2008.</p> <p>Colorado has 211 CAFOs. 99% of known CAFOs have been inspected. Seven CAFOs were added to the inventory in IY08.</p> <p>The number of CAFOs and CAFO facility names continue to be updated as new information becomes available from local health departments/counties, field inspectors, complaints and documents submitted by facilities.</p>
		4.8.1.3 Report, at the mid-year (March 31 of each year) and end-of-year, the number and percent of CAFOs inspected in the state and the number and percent of total CAFOs inspected in the priority areas.	<p>99% of all known (211) CAFOs have been inspected.</p> <p>42 CAFOs identified in Middle South Platte priority area, 93% inspected.</p> <p>13 CAFOs identified in Lower Arkansas priority area, 100% inspected.</p>
		4.8.1.4 Participate in up to 4 joint/oversight EPA/State CAFO inspections in addition to any other oversight inspections that may be conducted.	<p>Completed - EPA conducted two CAFO oversight inspections on June 2, 2008.</p> <p>Ag Program staff also participated in two EPA lead inspections on July 28, 2008.</p>

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		4.8.1.5 Provide electronic copies of all inspections conducted under the state's inspection plan to EPA at the time that the inspection is sent to the operator/permittee. This shall include inspections that are substituting for a planned inspection.	Copies of all CAFO inspections were submitted electronically to EPA on July 2, 2008 and December 12, 2008.

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		4.8.1.6 Provide, in the FY 07 and FY 08 end of year reports, information on compliance assistance activities and trainings conducted for AFO/CAFO operators and /or agricultural organizations.	<p>Ag Program conducted 25 compliance assistance site visits at AFOs and four at CAFOs, also assisted two AFOs via telephone.</p> <p>Annual Year In Review/Year Ahead CAFO/HCSFO stakeholder meeting held January 29, 2008. This meeting is a compliance assistance/outreach meeting that reviews the past year and proposed coming year activities of the Ag Program. (I.e., status of permits, lessons from inspections/enforcement issues, regulatory review, policies, etc.)</p> <p>Presentations given to Colorado Livestock Association Board of Directors, Swine Council and Dairy Council throughout the year on relevant CAFO/HCSFO regulatory issues.</p> <p>Ag Program holds quarterly meetings with several local health department liaisons to discuss CAFO, HCSFO and AFO requirements and issues in their areas.</p> <p>Participated in USDA, NRCS field training on Agricultural Waste Management in July 2008.</p>
4.9 Pursue delegation of federal authority to implement the Biosolids and Pretreatment programs in Colorado.			

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
4.10 Conduct a Biosolids management program, which facilitates, to the maximum extent possible, the beneficial use of Biosolids while assuring full protection of public health and water quality.	4.10.1 Colorado will conduct biosolids inspections in accordance with its inspection plan for the period of October 1-September 30 by September 30 <sup>th</sup> of each year.	4.10.1.1 Report: a) Percentage and number of NPDES permits that contain biosolids language. b) Maintain data in the Biosolids Data Management System (BDMS) or Equivalent database. Submit the data electronically by May 1st of each year for the preceding monitoring year.	4.10.1.1 a) 100 % b) The required data were submitted
		4.10.1.2 Report at the mid-year and end-of-year, a) Number of site inspections biosolids inspections. b) Number of facility evaluation biosolids inspections.	4.10.1.2 a) 61 b) 17
		4.10.1.3 Report on progress of obtaining Biosolids Program delegation.	4.10.1.3 The Division developed a proposal for a fee increase to support FTE for delegation in FY08 but that effort is not likely to succeed.
4.11 Conduct an Industrial Pretreatment Program that implements the requirements of the Colorado Pretreatment Regulations while not duplicating EPA programmatic efforts.	4.11.1 Colorado will conduct pretreatment inspections in accordance with its annual inspection plan for the period of October 1-September 30 by September 30 <sup>th</sup> of each year.	4.11.1.1 Report the percentage of Significant Industrial Users in POTWs with Pretreatment Programs and % of known Categorical Industrial Users in non-pretreatment POTWs that have control mechanisms implementing applicable Pretreatment standards and requirements.	4.11.1.1 100% of CIUs in non-pretreatment POTWs have appropriate control mechanisms.  # in POTWs w/programs TBD by EPA
		4.11.1.2 Report on progress of obtaining Pretreatment Program delegation.	4.11.1.2 The Division developed a proposal for a fee increase to support FTE for delegation in FY 08 but that effort is not likely to succeed.

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		4.11.1.3 Report, at the mid-year and end-of-year a) Number of pretreatment inspections at state permitted industrial users. b) The total number of state-permitted industrial users.	4.11.1.3 a) 10 b) 7
<b>4.12 Storm water Permitting Program Implementation</b>			
4.13 Continue to cover storm water discharges under state-issued general and individual permits requiring storm water management programs for Phase I and II municipal (MS4s) and industrial entities. (Note: assumes continued availability of general permits.) FOR FY08 the PAM codes are WQ-13a, WQ-13b, WQ-13c, and WQ-13d.	4.13.1 Issue or reissue, as required, the various storm water permit types to assure adequate protection of the environment.	4.13.1.1 Report the number of storm water sources associated with industrial activity, number of construction sites over one acre, and number of designated storm water sources (including Municipal Phase I and Phase II) that are covered by a current individual or general NPDES permit or other enforceable mechanism that: a) are covered by each current storm water general permit (e.g. industrial, construction, MS4); b) are covered by current individual storm water permits (e.g. Phase I MS4s); c) and the number of expired general or individual storm water permits.	4.13.1.1 Active SW General Permits - Certs as of 9/30/08: Light Industry: 739 Heavy Industry: 150 Construction >5 acres: 2700 Construction 1-5 acres: 1880 Sand & Gravel: 469 Metal Mining: 110 Recycling: 113 MS4, state-wide: 47 MS4, Cherry Creek Res Basin: 7 MS4, Non-Standard: 61  SW Individual Permits as of 9/30/08: Phase I MS4: 5 Industrial: 1  Number of Expired General SW Permits: 0  Number of Expired Individual SW Permits: 4

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		4.13.1.2 Provide information on compliance assistance activities and trainings conducted for permitted small MS4s.	4.13.1.2 In all, 47 presentations were made by Storm water Program staff - on Phase II and construction permitting, compliance assistance, and inspector training - at seminars and conferences for various groups. Fourteen (14) presentations were made for the SW BMP class, offered at Red Rocks Community College, and in Grand Junction and Durango. Fourteen (14) sessions of the 2-day Storm water Storm water Inspector training were held. Specific trainings were provided regarding MS4s, TMDLs, the construction industry, oil and gas construction to watershed groups, and trade associations.
4.14 Involve regulatory agencies and the public as necessary to effectively permit storm water discharges.	4.14.1 Include EPA in the review process prior to issuing general permits for storm water discharges and individual Phase I permits for large and medium size MS4s.	4.14.1.1 Report on process to include EPA in the review of general permits for storm water discharges and individual Phase I permits for large and medium size MS4s prior to issuance.	4.14.1.1. All general and individual SW permits are routinely sent to EPA at the same time as they are sent to public notice. All EPA comments have been responded to.
		4.14.1.2 Report on the accessibility of the State program by the public and regulated entities (i.e. contact information, hotlines, web sites, etc.)	4.14.1.2. The SW Program website continues to be heavily used for applications, guidance documents, etc. In addition to the weekly listing of construction applications received within the past month, the SW Program lists all active SW construction certifications, updated on a monthly basis.

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
4.15 Implement a process for incorporating TMDLs with storm water allocations into general permits.		4.15.1.1 Report on: a) Number of EPA approved TMDLs with storm water allocations. b) Number of EPA approved TMDLs with storm water allocations that have been incorporated into storm water general permits.	4.15.1.1 a) As of 09/30/08, there was one EPA- approved TMDLs with storm water allocations.  b) As of 09/30/08, there were no storm water permits that have incorporated a TMDL WLA although one such permit has been noticed for public comment.
4.16 Storm water Inspections and Reporting	4.16.1 Colorado will conduct storm water inspections and MS4 audits in accordance with its inspection plan for the period of October 1-September 30 by September 30th of each year.	4.16.1.1 Report, at the mid-year (March 31 <sup>st</sup> of each year) and the end-of-year, the number of storm water inspections and MS4 audits conducted. Submit copies of storm water inspections received by the Division from a local agency during a calendar quarter to EPA by no later than the 20 <sup>th</sup> day of the month following the end of the quarter.	4.16.1.1. For 10/07 through 9/08, 41 storm water inspections were conducted by Storm water Program or other Division staff and 307 storm water inspections were conducted by outside parties (e.g. Air Pollution Division, local health departments, and independent contractor).  Quarterly reports were made to EPA on a timely basis.  Oct -Dec 07    50 inspections  Jan-Mar 08    46 inspections  Apr-Jun 08    209 inspections  Jul- Sep 08    43 inspections  Total:        348 inspections  The following MS4 Construction

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
			Sites program oversight activities were conducted in accordance with the Inspection Plan: Number of MS4s with Oversight Activities conducted = 8 Screening Inspections = 32 Construction Site Full Inspections = 1 MS4 Oversight Inspections = 2 Total of Inspection Units = 35
5. Compliance Assurance (for pollution control facilities) - Maintain a high overall compliance rate with all water quality regulatory requirements.			

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
5.1 Conduct Inspections of and/or monitor self-reported data submitted by, the state's CDPS discharges to positively determine the compliance status of regulated facilities and activities.	<p>5.1.1 Conduct NPDES inspections described in the inspection plan for the period of October 1-September 30 of each year. Complete inspection reports and enter into PCS database by December 31st of each year. Submit draft industrial, municipal, storm water, and CAFO inspection plan for the coming federal fiscal year (October 1-September 30) by September 1st and finalize the plan within 15 days of receiving EPA comments. Selected major facilities will be inspected in accordance with Colorado's self-certification program as described in Chapter 2 of this PPA and detailed in the above-referenced inspection plan.</p> <p>Colorado will identify and formally track significant violations detected during inspections to gain compliance.</p> <p>Colorado and EPA Region 8 may participate in a number of joint/oversight inspections at regulated facilities during the inspection year. EPA will contact the state to schedule joint inspections at facilities identified in the wastewater inspection program.</p>	<p>5.1.1.1 Report to EPA in the State End-of-Year Report the number of each of the following inspections:</p> <ul style="list-style-type: none"> <li>- Majors,</li> <li>- Minors,</li> <li>- CSOs and/or SSOs,</li> </ul> <p>Also, provide the status of inspection follow-up activities in the End of Year Report.</p>	<p>5.1 Division staff routinely conducted inspections and reviewed submitted self-reported data (DMRs) to determine compliance status and initiate the appropriate enforcement response.</p> <p>5.1.1 The WQCD inspection plan was delivered to EPA on September 5, 2007. Significant violations detected were identified and formally tracked.</p> <p>Completed inspections for IY 07 were entered into PCS by December 31, 2007.</p> <p>5.1.1.1</p> <ul style="list-style-type: none"> <li>a) 53 majors (46 CEIs and 7 CSIs)</li> <li>b) 150 minors (Inspection plan commitment = 113)</li> <li>c) 4 SSO (all inspections identified in inspection plan)</li> </ul> <p>85 minor and 19 major facilities had significant violations and 31 and 8 of those violations, respectively, were resolved in FY 08.</p>

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	5.1.2 Continue to conduct the DMR Quality Assurance program.	5.1.2.1 Follow up on all significant problems with DMR QA and provide EPA with a summary of follow-up actions.	<p>DMR-QA was conducted for the calendar year 2007. The DMR QA Study 27 closed on December 7, 2007. One hundred five (105) major and select minor facilities participated in DMR-QA Study 27. Of the 105 facilities that participated in Colorado; two (2) facilities did not participate because their permits have been terminated. Eighty-seven (87) facilities submitted data with acceptable results and 18 facilities submitted unacceptable results. Eleven (11) of these facilities remedied the unacceptable results with corrective actions. Four (4) facilities did not participate during the course of the Study.</p> <p>The schedule for the DMR-QA was changed for the 2008 study, and the DMR-QA Study 28 opened earlier than previous studies on May 1, 2008 and ran until the closing date of December 5, 2008.</p>

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	5.1.3 Address instances of WET failure with formal enforcement actions when a facility fails its WET test on a continuing basis and the facility is not under an enforceable schedule to determine the cause of the failures and to take appropriate action to return to compliance	5.1.3.1 Submit as part of the End-of-Year Report, a summary of actions taken to address WET violations.	5.1.3 No instances of WET failures were identified during this reporting period that warranted a formal enforcement response.  5.1.3.1 No formal enforcement actions were needed or taken to address WET violations during this reporting period.

Water Quality Control Division Goals - Part I Clean Water Act

Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
5.2 Continue to implement the Sanitary Sewer Overflow (SSO) Response Plan until such time as the SSO regulations are finalized.	5.2.1 During the federal fiscal year, address 20% of the SSOs added to the SSO inventory during the three previous state fiscal years.	5.2.1.1 Provide to EPA by October 15 <sup>th</sup> of each year, a) an updated SSO inventory; b) the number and percent of SSOs addressed and a description of how 20% of the SSOs in the inventory were addressed; c) the number of NPDES inspections targeted to identify SSOs; d) the number and percent of SSO inspections in priority watersheds including the name of the priority watershed; e) the number and type of informal and formal enforcement actions taken in response to SSOs; and f) the percent of enforcement actions in priority watersheds for SSOs,	Information under 5.2.1.1 was not provided by October 15, 2007. The following information is provided at this time. a) 730 SSO incidents occurred during the period from July 1, 2003 through June 30, 2007 (normally 3-yr rolling period, but 4-yrs this FY due to staffing issues). b) Objective is to address 20% of 730 or 146 incidents.  Focused inspections were conducted at the City of Boulder and Genesee Water and Sanitation District which addressed 22 incidents.  Fourteen (14) additional systems were sent inquiry letters. The responses are currently under review. This addresses 100 incidents. Eleven (11) SSOs were addressed through enforcement actions.  c) Four (4) SSO-specific inspections were conducted as per the inspection plan. d) One (1) (25%) of the SSO inspections was in a priority watershed; COSPUS 14. e) The State settled or amended three (3) formal actions in FFY08. Copies of actions were provided to EPA at the time of issuance: City of Durango/SSO Consent Order, 1-21-08; Mt. Crested Butte W&SD / SSO Consent Order, 3/14/08; City of Trinidad / SSO NOV-CDO Amendment, 3/31/08

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	5.2.2 Collection system capacity evaluation based on EPA questionnaire will be completed by one facility between 10 and 100 mgd.	5.2.2.1 Review submittal by September 30th of each year and determine if SSOs during the three previous fiscal years are being addressed. Where adequate capacity is not demonstrated, the Division will inform the system that failure to address capacity issues will be considered an exacerbating factor in determining whether to take an enforcement action for an SSO.	5.2.2.1 No collection system capacity evaluations were completed in FY08. The Division has committed to completing one in FY09.
5.3. Compliance Assurance - Implement the federal and state laws, regulations and policies governing water quality in a timely, efficient and fair manner.			
5.3.1 Maintain a high overall compliance rate with applicable statutes and regulations	5.3.1.1 Evaluate all violations to determine an appropriate response and apply the provisions of the Enforcement Management System, Enforcement Escalation/Response Guides, Civil Penalty Policy and SEP Policy in all enforcement actions.	5.3.1.1.1 Implement the Division's SSO Response policy.	5.3.1.1.1 The Division did not implement its policy in FY 07 due to loss of staff that was responsible for the program and other staff priorities. The Division resumed work in accordance with the SSO Response Policy late in FY 08.
		5.3.1.1.2 Continue to implement the draft Enforcement Response Guide and Storm water Compliance and Enforcement Strategy for industrial storm water.	5.3.1.1.2 Division staff continued to refine and implement the storm water enforcement response guide.
		5.3.1.1.3 Continue to implement and update as necessary the State's CAFO compliance and enforcement strategy and Enforcement Response Guide.	5.3.1.1.3 Division staff continued to refine and implement the Animal Feeding Operations (including CAFOs) enforcement response guide.

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Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		5.3.1.1.4 Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year.	11.5% (source: OTIS State Review Framework)
		5.3.1.1.5 On a quarterly basis complete the electronic explanation code sheets for the Watch List and forward to EPA Region 8.	5.3.1.1.5 Division staff reviewed the Watch List each quarter and provided EPA with annotations outlining resolution or intended actions.
		5.3.1.1.6 EPA will review inspection reports, citizen complaints, and SSO reports for wet weather priority area operations to determine if violations are being escalated to enforcement. Any areas of concern will be discussed during quarterly EPA-WQCD meetings. Follow-up may include file reviews of inspections by EPA.	
		5.3.1.1.7 In the interest of conserving resources, Colorado agrees to EPA being the lead agency on all 404 enforcement actions that have associated CWA section 402 violations, except where EPA determines that combined cases may not be in the best interest of the litigation. Colorado will have the opportunity to join the 402/404 case if it is a judicial referral.	
		5.3.1.1.8 EPA will perform inspections in support of national wet weather enforcement cases and will provide the state with notice of the inspection in advance if	

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		possible. At the state's discretion, it may attend the inspection in an observer/consulting role. EPA will conduct inspection follow-up and enforcement for those facilities it inspects. The state will be given the opportunity to join any national case that includes violations discovered as a result of any EPA inspection in Colorado or, where no national case is filed, the state will be given the option of joining if the case is filed as a judicial referral. Where the state has joined EPA in a national referral case, the state will inspect sites targeted after any consent decree is final.	
5.3.2 Promote communication with EPA.	5.3.2.1 CDPHE and EPA agree to work together to modify the 1986 Enforcement Agreement for the Colorado Water Quality Control Program (Enforcement Agreement) as soon as practicable but prior to the agencies' mid-year meeting. The agencies agree that amendment of the agreement is necessary in order to update this twenty-plus year old agreement, particularly to recognize the fluid nature of EPA oversight of Colorado's program as provided for in the development of the Performance Partnership Agreement (PPA) under the National Environmental Performance Partnership System and the implementation of the State Review	5.3.2.1.1 As agreed to between Colorado and EPA Region 8, except for activities described in section 5.3.2.1.2, below, report to EPA: a) final settlement agreements; b) upon request, penalty calculations including justifications for adjustments and BEN for state enforcement actions concluded during the fiscal year will be made available to EPA at the state's offices; and c) description of any SEPs included in the state enforcement actions concluded in the fiscal year.	5.3.2.1.1 Division staff routinely provided EPA staff with electronic copies of final settlement agreements (including SEP descriptions) and upon request made penalty calculations (including supporting documentation) available to EPA staff.

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	<p>Framework. During the time leading up to execution of a revised Enforcement Agreement, the agencies, as the only two parties to the Enforcement Agreement, agree that routine EPA oversight of Colorado's Clean Water Compliance Assurance Program will be done in accordance with this PPA except where the PPA is silent on an issue (e.g. the QNCR). Colorado and EPA Region 8 recognize EPA's authority to obtain information from the state on any specific situation of suspected non-compliance and the state will provide requested information to EPA Region 8 in any such situation. Quarterly meetings between CDPHE and EPA will be held to discuss current and projected enforcement cases, inspection commitments, work conducted in priority areas and sectors, and any other items as necessary.</p>	<p>5.3.2.1.2 As agreed to between Colorado and EPA Region 8:  a) For federal fiscal year 2008, the EPA will conduct enhanced reviews of settlement actions in the national priority areas of CAFOs and SSOs. The goal of these reviews will be to ensure that SSO and CAFO violations are addressed to achieve the deterrence goals of the national wet weather strategies through effective injunctive relief and appropriate penalties.  b) The enhanced reviews will be conducted under a procedure to be negotiated between the Division and EPA Region 8.  c) Continuation of enhanced reviews will be discussed during FFY 09 PPA negotiations.</p> <p>5.3.2.1.3 Submit copies of issued enforcement actions, settlement agreements, and penalty actions (including SEPs) to EPA to facilitate EPA's file reviews for the State Review Framework; documents will be transmitted in electronic format unless hard copies are requested by EPA.</p>	<p>5.3.2.1.2 NDPES enforcement and CAFO staff have met with EPS NPDES enforcement staff on a quarterly basis.</p> <p>5.3.2.1.3 Division staff routinely provided EPA staff with electronic copies of issued enforcement actions.</p>
5.3.3 Develop and maintain comprehensive database.	5.3.3.1 Ensure that all data requirements in PCS are being entered and reported to EPA's national data systems.	5.3.3.1.1 For all domestic and industrial entities with NPDES permits, enter permit facility data, permit event data and inspection data into PCS.	Data were entered into PCS until July 2008, when the State migrated to ICIS. July – September data have been entered into ICIS.

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		5.3.3.1.2 Enter SSO inspections into the PCS database. Enter SSO violations into PCS as single event violations.	SSO inspections were entered into PCS/ICIS as required.
		5.3.3.1.3 Enter inspections and enforcement actions at CAFOs with NPDES permits into PCS. Approved Nutrient Management Plans will also be tracked in PCS.	FFY 08 inspections are being entered into ICIS in December 2008.
	5.3.3.2 Ensure that data that is not maintained in PCS is available to EPA.	5.3.3.2.1 Until storm water permits data are entered into ICIS, CDPHE will provide EPA with an electronic copy of the storm water permit tracking system on October 31, 2007 and April 30, 2008. Quarterly, provide EPA with a current number of industrial and construction storm water permits. (October 15, 2007, January 15, 2008, April 15, 2008 and July 15, 2008.)	
		5.3.3.2.2 State will submit the annual non-major facilities noncompliance report for the previous calendar year in accordance with 40 CFR §123.45 (c) according to the date determined by EPA HQ and communicated to the State in early in the calendar year, tentatively April 30, 2008.	Generation of the non-majors noncompliance report for calendar year 2007 was available via PCS/ICIS. EPA did not determine a date or communicate with the State in FFY08; the State presumes that EPA HQ generated the report through PCS.
6.0 Water Quality Restoration and Enhancement Efforts - Implement activities to improve water quality and attain water quality standards as affected by nonpoint source pollutants.			
6.1 Nonpoint Source Program Implementation - Assure that the Clean Water Act Section 319 funds address high priority projects consistent with the watershed approach.			

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
6.1.1 Continue to provide funding for non-point source priority projects to identify solutions to non-point source pollution.	6.1.1.1 a) Implement the updated Colorado Nonpoint Source Management Plan Supplement. b) Identify watershed plans to be developed for high priority watersheds. c) Prepare statewide project funding list for public hearing by the WQCC. d) Submit project implementation plans for EPA Region 8 approval. e) Assure projects meet all federal and state reporting requirements. f) Report project specific into GRTS. g) Utilize EPA State Grant Performance Measures template for service area specific requirements.	6.1.1.1.1 a) Utilize Management Plan Supplement to implement all program requirements. b) Encourage local entities to develop watershed plans in high priority watershed. Report number of plans or the number of requests for assistance generated by 6.1.2 on an annual basis. c) Potential project sponsors and costs identified. d) Site-specific project implementation plans developed where sponsors are identified. e) Receive EPA Region 8 approvals. f) Complete GRTS biannual updates. g) Track and report on applicable performance measures.	6.1.1.1.1 a) 2005 Supplement to the 2000 NPS Management Plan finalized in August 2005 and is continuously utilized to implement all program requirements. b) Nine (9) watershed plans being developed statewide. Four (4) watershed plans being developed in priority watersheds. Staff working with local interests to develop watershed plans in priority watershed areas. c) 2007 NPS funding list reviewed and approved by the WQCC in March 2008. d) 2007 project plan development is on schedule. Progress made towards completion of project implementation plans. e) PIPs regularly submitted to EPA Region 8 for approval. f) GRTS updates ongoing.
6.1.2 Number of watershed based plans (and miles/acres covered), supported under State Nonpoint Source Programs (section 319) since the beginning of FY 2002 that have been substantially implemented. (FY 07 WQ27 (I); FY08 - None)	6.1.2.1 Continued implementation of completed watershed based plans to protect existing water quality standards and classifications, and to continue improvement of water quality where not attaining standards.	6.1.2.1.1 Actual number of watershed plans (with water miles/acres covered) with substantial implementation as identified by the State.	6.1.2.1.1. Straight Creek, Black Gore, Upper Animas, and Cherry Creek, Coal Creek (Crested Butte), San Miguel River, Alamosa River, Rio Grande River, Fountain Creek, Upper South Platte River, Left Hand Canyon Creek, James Creek, North Fork Republican River, Big Thompson River, Clear Creek, Lower Gunnison, Upper Arkansas River basin, Kerber

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
			Creek, and Willow Creek.
6.1.3 Number of water bodies identified by States in 2000 as being primarily NPS-impaired that are partially or fully restored (cumulative). (FY07 WQ16 (I, R); FY08 WQ10)	6.1.3.1 Determine improving water quality and progress towards attaining applicable water quality standards and classifications.	6.1.3.1.1 a) Actual number of water bodies identified by States that show water quality improvements or standards attainment. b) Submit one success story candidate to EPA Region VII for review by September 30, 2008. FT2012 target – 4 success story candidates (cumulative).	6.1.3.1.1. Thirty (30) water bodies or segments that show water quality improvements and/or standards attainment as follows: Iowa Gulch, Sayres Gulch and South Fork Lake Creek, (Arkansas Basin); San Miguel River; Slate River (Upper Gunnison Basin); Uncompahgre River; Wightman Fork and tributaries, Terrace Reservoir, Alamosa River (Alamosa Basin); Big Springs Creek (San Luis Valley); Silver Creek - two segments (Dolores Basin); Box Canyon Creek (La Plata Basin); Little Thompson River (Big Thompson Basin); Leavenworth Creek and Clear Creek – two segments (Clear Creek Basin); North Fork Cache la Poudre River (Cache la Poudre Basin); Little James Creek (Saint Vrain Basin); North Fork South Platte River and tributaries, Mary Lake, Lake Ladora and Lower Derby Lake (South Platte Basin); Peru Creek and French Gulch (Blue River Basin); Eagle River and Cross Creek (Eagle River Basin); and Coal Creek (Crystal River Basin).

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
6.1.4 Annual reduction in lbs/tons of nitrogen from nonpoint sources to water bodies. (FY07 EPA PAM WQ15 (I, R); FY08 WQ 9aT)	6.1.4.1 Determine nonpoint source pollutant loading reduction for nitrogen.	6.1.4.1.1 Nitrogen – Report actual load reductions in GRTS as project-specific information.	6.1.4.1.1 Nitrogen: (Calendar year 2007 reporting period) 0 lbs.
6.1.5 Annual reduction in lbs/tons of phosphorus from nonpoint sources to water bodies. (FY07 EPA PAM WQ15 (I, R); FY08 WQ 9bT)	6.1.5.1 Determine nonpoint source pollutant loading reduction for phosphorus.	6.1.5.1.1 Phosphorus – Report actual load reductions in GRTS as project-specific information.	6.1.5.1.1 Phosphorus: (Calendar year 2007 reporting period) 760 lbs - Cherry Creek Reservoir 171.5 lbs - Bear Creek Reservoir
6.1.6 Annual reduction in lbs/tons of sediment from nonpoint sources to water bodies. (FY07 EPA PAM WQ15 (I, R); FY08 WQ 9cT)	6.1.6.1 Determine nonpoint source pollutant loading reduction for sediment.	6.1.6.1.1 Sediments – Report actual load reductions in GRTS as project-specific information.	Sediment: (Reported from 7/1/07 to 6/30/08) 5,630 tons - I-70/Black Gore Creek project; 1,645 tons - I-70/ Straight Creek project; 477 tons - Left hand Creek
6.2 Federal Lands Consistency Reviews - Nonpoint Source Program coordination with public lands agencies.			
6.2.1 Assure that the Nonpoint Source and SWAP Programs coordinates with public land agencies regarding potential water quality impacts of land use decisions and implementation.	6.2.1.1 Conduct federal consistency audits and arrangements with BLM and USFS.	6.2.1.1.1 Complete 2 USFS national forest or BLM district consistency audits and associated reports on protection or restoration of water quality standards and classifications.	White River National Forest; John Martin Reservoir
7.0 Financial Assistance - Provide administrative and technical services to water quality projects identified in the WPCRF IUP to assure compliance with the CWA.			
7.1 Identify water quality projects and provide appropriate financial assistance.	7.1.1 a) Submit IUP for approval in August 2007 by the WQCC. b) Administer WPCRF project loans identified and prioritized in the WPCRF Intended Use Plan (IUP) in compliance with the CWA and the operating agreement with EPA Region 8. c) Track project data in a database and project files.	7.1.1.1 a) WQCC approval of IUP in October 2007. b) Report administration of WPCRF in 2007 Annual Report. c) Conversion or downloading of data into the National Information Management Systems (NIMS).	a) WQCC approved the 2008 WPCRF IUP in November 2007. b) The 2007 WPCRF Annual Report was submitted April 2008. c) The National Information Management System updated with project data in September 2008. A shared database system with Colorado Water Resources and Power Development Authority (CWRPDA) is also currently used for project

Water Quality Control Division Goals - Part I Clean Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
			tracking and program management.
7.2 Fund utilization rate [cumulative loan agreement dollars to the cumulative funds available for projects] for the CWSRF. (FY07 WQ-24 T, R; FY08 WQ-17T)	7.2.1 Determine annual utilization of available funds for investment in public wastewater treatment facilities and nonpoint source activities.	7.2.1.1 Calculated fund utilization rate of Colorado WPCRF.	7.2.1.1 The fund utilization rate was 95%
7.3 Number of water bodies restored and improved or protected per million dollars of CWSRF. (FY07 EPA PAM WQ-25 T, R; FY08 None)	7.3.1 Determine effectiveness of federal investment in a) restoring and improving, or b) protecting water bodies.	7.3.1.1 a) Calculated number of restored and improved water bodies per CWSRF investment. b) Calculated number of protected waterbodies per CWSRF investment.	OUTCOME: 7.3.1.1. The CWSRF Environmental Benefits database identifies: a) Four (4) projects, totaling \$18,363,000 as improving water quality b) Six (6) projects totaling \$19,712,000 were identified as infrastructure projects related to protecting waterbodies.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
1.0 SDWA Regulatory Development - Adopt Primary Drinking Water Regulations to Maintain Primary Enforcement Authority.			
1.1 Adopt regulations within statutory deadlines or EPA approved extension schedule.	1.1.1 Conduct early implementation activities of the Stage 2 DBP and LT2 SWTR rules.	1.1.1.1 Cooperate with EPA in identifying water systems in violation of the early implementation requirements of the Stage 2 DBP rule and LT2 SWTR in order for EPA to conduct enforcement prior to the state's obtaining primacy for these rules.	The State provided information/data to EPA as requested and assumed primary enforcement responsibility when interim primacy was received.
2.0 SDWA Control Mechanisms - Implement All Primary Drinking Water Regulations			
2.1 Implement all primary Drinking Water Regulations for which Colorado has been delegated primary enforcement authority.	2.1.1 Report on the status of EPA-identified requirements of the lead & copper rule and the surface water treatment rule.	2.1.1.1 By May 1, 2007, report on the status of lead response actions taken by community and NTNC water systems whose 90 <sup>th</sup> percentile tap samples have exceeded the lead action level.	The report was provided to Region 8 on May 1, 2008. <i>(Note that the date in the PPA performance measure should have been May 1, 2008, not May 1, 2007.)</i>
	2.1.2 SWTR – identify and resolve GWUDI.	2.1.2.1 By November 15, 2007, provide to EPA a list of all systems that are required to filter under the SWTR but are not yet filtering. Report the violations to SDWIS-FED. For systems on compliance schedules, provide the schedule from the enforcement document. If any system is not under a compliance schedule, provide a rationale and proposed action and time frame for securing compliance.	The report and associated compliance schedule information was provided to EPA on November 15, 2007 and uploaded to SDWIS-FED.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		2.1.2.2 By November 15, 2007, provide to EPA a description of any additional actions and time frames for completing assessments of ground water under the influence of surface water, and the systems for which such assessments need to be completed.	The Report was provided EPA on November 15, 2007.
<b>3.0 SDWA Compliance Assistance - Assist Regulated Entities to Consistently Provide Safe Drinking Water.</b>			
3.1 Implement Source Water Assessment Program (SWAP) and Wellhead Protection Programs.	3.1.1 Acquire federal DWSRF set aside funding for program implementation.	3.1.1.1 Submittal of FY2008-13 Wellhead Protection and Capacity Development Set-Aside Work Plan Amendments to EPA Region 8 by June 30.	3.1.1.1 The Colorado Wellhead Protection Set Aside 2002-2006 Workplan was submitted to EPA on December 1, 2005 and was approved on December 20, 2005. The effective work plan period is through June 2008. The FY2008-13 work plan was submitted to EPA on September 26, 2008. EPA approval pending.
	3.1.2 Develop annual program targets with EPA Region 8 on an annual basis	3.1.2.1 Submit narrative of anticipated program activities and estimated completions by March 31, 2008.	3.1.2.1 Activities and estimated completions narrative was submitted in the Integrated Source Water Assessment Project (ISWAP) Plan on September 28, 2007. Regular communication with EPA staff conducted on implementation.
	3.1.3 Assist public water systems in identifying potential sources of contamination and developing source water protection strategies.	3.1.3.1 Provide technical and programmatic assistance to public water systems and local interests implementing source water assessment and protection activities.	3.1.3.1 Assistance provided on an as-requested basis throughout performance period.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	3.1.4 Implement coordinated program activities with Financial Assistance Program, Colorado Rural Water, and EPA Region 8.	3.1.4.1 Implement regular communication mechanism to insure coordination.	3.1.4.1 State and EPA staff had regular communication throughout the performance period.
	3.1.5 Report program progress regarding program targets and actual completions.	3.1.5.1 Submit report in EPA-provided reporting matrix or electronic transfer protocol by October 2008.	3.1.5.1 2008 Performance Accountability Report submitted to the EPA on September 24, 2008.
3.2 Percent of community water systems and populations served by community water systems where risk to public health is minimized by source water protection. (FY07 Measure F; FY08 SP-4aT & 4bT)	3.2.1 Reduce potential consumer exposure of community drinking water systems to various contaminants in raw water sources.	3.2.1.1 a) Number of source water areas with “minimized risk achieved by substantial implementation” of source water protection actions as determined by Colorado. b) Calculated percent of population for Colorado.	3.2.1.1 a) Fourteen (14) community water systems and their associated source water areas were reported with “minimized risk achieved by substantial implementation”. This equates to approximately 2% of community water systems in Colorado. b) One (1) percent of the population served by community water systems have “minimized risk by substantial implementation”.
3.3 Assist public water systems with the DWRF to build required infrastructure to ensure consistent provision of safe drinking water.	3.3.1 Submit IUP for approval in August 2007 by the WQCC.	3.3.1.1 WQCC approval of IUP in October 2007.	3.1. WQCC approved the DWRF IUP in November 2007.
	3.3.2 Utilize the existing federal-state-local team approach to identify projects that address health and compliance issues for drinking water treatment and distribution systems.	3.3.2.1 Number of community and non-community, non-transient water systems and population served with no violations as a result of the Drinking Water SRF to be reported in the annual report.	3.3.2.1. A total of 3 systems serving a population of 2,081 received loans in 2007 totaling \$1,592,397. These systems are either still in construction or have completed construction and have reported no violations.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	3.3.3. Administer DWRF loans identified and prioritized in the DWRF Intended Use Plan (IUP) in compliance with the SDWA and the operating agreement with the CWRPDA.	3.3.3.1 Percent of existing facilities seeking SRF funding that are evaluated for all three capacity elements (technical, financial and managerial).	3.3.3.1. 100% of existing facilities seeking SRF funding have been evaluated for technical, financial, and managerial capacity.
3.4 Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the DWRF. (FY07 SDW-7 (T;I) FY08 SDW-4T)	3.4.1 Determine annual utilization of available funds for investment in public water system treatment facilities.	3.4.1.1 Calculated fund utilization rate for Colorado DWRF.	3.4.11 The DWRF fund utilization rate was 85%.
3.5 Number of DWRF projects that have initiated operations. (cumulative) (FY07 SDW – 14 (I, R) FY08 SDW-5T)	3.5.1 Determine number of drinking water facilities funded through DWRF that a) initiated construction, and b) return to compliance.	3.5.1.1 a) Calculated number of projects initiated (R); b) Calculated number of projects that return systems to compliance.	3.5.1.1 a) sixty-six (66) of the 81 DWRF funded projects have initiated operations. b) Twenty-five (25) DWRF loans (cumulative) have been provided to return systems to compliance.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
3.6 Eliminate sanitary defects at public water systems that could increase the risk that contaminated drinking water will be distributed to consumers.	3.6.1 Conduct sanitary surveys at public water systems as required by Primary Drinking Water Regulations, an eight part survey once every three years for all subpart H community water systems (except for outstanding performers) and every five years for all other subpart H systems in accordance with the approved annual sanitary survey plan, including completion of written reports within 90 days of conducting fieldwork.	3.6.1.1 The State will enter into SDWIS/STATE, the most recent sanitary survey date completed since January 1, 2004 for all Subpart H Community Water Systems which have received a survey consistent with the eight part requirements of 40 CFR 142.16(b)(3) by December 31, 2007.	3.6.1.1 This was completed.
		3.6.1.2 In accordance with 40 CFR 142.15(a)(5), the State shall submit to the Region 8 Drinking Water Unit a list of all Subpart H Systems that have had a Sanitary Survey meeting the eight part requirements of 40 CFR 142.16(b)(3) during calendar year 2007 by the end of January, 2008. The State may meet its obligation for such a list by entering the completion date of each required Subpart H System survey into SDWIS/STATE. 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 2007 as required by 40 CFR 142.15(a)(5) by February 15, 2008.	3.6.1.2 This was completed.
		3.6.1.3 Provide in the end-of-year report, the number and percentage of systems not surveyed within required timeframes in each of the following categories: Groundwater systems not surveyed in the last 5 years; Community surface water systems not surveyed in the last 3 years; and, Non community surface water	3.6.1.3 Groundwater systems not surveyed in the last 5 years = 216 (15%); community surface water systems not surveyed in the last 3 years = 25 (8%); non-community surface water systems not surveyed in the last 5 years = 23 (13%).

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	3.6.2 Resolve significant deficiencies discovered during sanitary surveys.	3.6.2.1 Report the percent of systems with significant deficiencies detected during Engineering sanitary surveys that are resolved.	3.6.2.1 One hundred and ninety nine (199) systems with significant deficiencies detected during sanitary surveys; 59 (30%) resolved.
3.7 Ensure that new or modified public water system treatment facilities are constructed in accordance with design criteria or acceptable variances thereto.	3.7.1 Review plans for all new or modified treatment facilities within 45 days of receiving a complete submittal.	3.7.1.1 Report the number of plan reviews completed and the percent of reviews completed within 45 days total review time.	3.7.1.1 One hundred and ninety one (191) plan reviews completed; 94 (49%) completed on time.
4. Compliance Assurance – Synthesize, coordinate and apply appropriate assistance tools, informal enforcement, formal enforcement and penalties to ensure timely correction of violations, and deterrence.			
4.1 Water Safe to Drink – 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. Maintain a high overall compliance rate with all drinking water regulatory requirements. PAM 2.1 Protect human health by reducing exposure to contaminants in drinking water.	4.1.1 Monitor self-reported data submitted by the state's drinking water supplies, to ensure that reported data meet all existing federal and state requirements; ensure reported data are accurately entered into the state's data system; and that violations are determined and responded to. Measure State outcomes against National targets. (Note: Colorado reports the sum of all population types to the national database, which is the data source used by EPA. Many states report only the residential populations for community water systems. Therefore, performance measures for this objective calculated using Colorado data from SDWIS/FED may be inconsistent with the measures calculated for some other states.	4.1.1.1 Percent of community water systems that provide drinking water that meets all applicable health-based drinking water standards. Strategic target is 90%.	For FFY 08 (violations in effect between 10-1-2007 and 9/30-2008, inclusive):  88%
		4.1.1.2 Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through effective treatment and source water protection. Strategic target is 90%.	For FFY 08 (violations in effect between 10-1-2007 and 9/30-2008, inclusive):  96%
		4.1.1.3 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 meets all applicable health-based drinking water standards. Strategic target is 95%.	This is a new national measure which the State is not able to calculate reliably.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	4.1.2 Sample and analyze treated water from at least 50 public water systems to ensure the results obtained support the self reported data submitted by the public water system or to support enforcement cases.	4.1.2.1 Report the number of public water systems sampled during the state fiscal year.	4.1.2.1 Sixty-one (61) public water systems were sampled during FY08.
4.2 Implement the federal and state laws, regulations and policies governing drinking water systems in a timely, efficient and fair manner.	4.2.1 Complete the revision of the Enforcement Management System (EMS), taking into account CDPHE and Division policies.	4.2.1.1 Revise the Enforcement Escalation Policy to include new drinking water rules, including Disinfection Byproducts, CCR, and LT1 SWTR and submit to EPA by November 15, 2007.	A draft revision was submitted on 12/17/07.
		4.2.1.2 Implement the draft Civil Penalty Policy for systems that have failed to comply with an Enforcement Order.	4.2.1.2 The Division routinely includes civil penalties in Enforcement Orders for most public water systems with demonstrated histories of failing to monitor or report. Such penalties have ranged from several hundred dollars to several thousand dollars, depending on the types and frequency of the violations. In addition to civil penalties, systems that fail to comply with enforcement orders are referred to the State Attorney General.
4.3 Take action to address those PWSs that are identified and confirmed to be significant non-compliance (SNC).	4.3.1 Aggressively manage the quarterly SNC list to identify planned actions and to inform EPA of past quarter's accomplishments. The date that a system becomes a SNC is defined by the SNC definitions published by EPA for each rule, regardless of the "SNC"	4.3.1.1 Annotate the Quarterly SNC list, and indicate what actions are planned for each SNC. Return the annotated form to EPA within 30 days of receipt.	Completed on a quarterly basis.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
	and “Exception” dates generated by the Federal database and listed on the quarterly SNC lists.	4.3.1.2 Where appropriate, conduct sanitary surveys or technical assistance visits (with written reports) at PWSs, which are SNCs.	4.3.1.2 Sanitary surveys were conducted at five (5) PWSs that were on the SNC target list.
		4.3.1.3 Implement the State’s Enforcement Escalation Policy; Ensure enforceable compliance schedules are in place for all SNCs within eight months of the date that the PWS becomes a SNC unless the facility has returned to compliance.	For all systems in SNC during FFY 08, the State met the timeliness goal (within eight months of SNC status) 80% of the time.
	4.3.2 Prioritize enforcement activities in order to meet the National Enforcement benchmarks for FY 04-07.	4.3.2.1. Address through formal enforcement 100% of SNCs at large and medium systems before they become Exceptions.	Six systems serving a population >10,000 were in SNC in FFY08; Five (83%) were addressed prior to the exception date.
			20 systems serving a population >3300 were in SNC in FFY08; 13 (65%) were addressed prior to the exception date.
		4.3.2.2. Address through formal enforcement at least 90% of microbial SNCs, 85% of nitrate, lead and chronic contaminant SNCs, at small systems before they become Exceptions.	At systems serving <3300 persons: 85% (17/20) of microbial MCL and TT SNCs were address before they became exceptions; 89% of chem/rad SNCs (including DBPs) were addressed before they became SNCs

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
4.4 Provide information to facilitate EPA oversight of all state formal enforcement actions.		4.4.1.1 Provide EPA a copy of all settlement agreements, both administrative and judicial. Upon request make penalty calculations and supporting documentation available to EPA.	Enforcement documents were provided to EPA at the time of issuance.
		4.4.1.2 Provide copies to EPA of enforcement actions issued to systems for violations related to filtration. Copies of actions will be provided to EPA Region 8 by November 1, in electronic format unless EPA requests a hard copy.	Enforcement documents were provided to EPA at the time of issuance.
5. SDWA Data Management - Develop and Implement a State Drinking Water Program database that will accurately portray system capacity, compliance and enforcement information.			
5.1 Maintain the Federal database.	5.1.1 State sanitary survey activities will be accurately recorded and reported to EPA.	5.1.1.1 The State commits to entering all sanitary surveys performed in the previous inspection year into SDWIS/FED by November 15, 2007 or submitting a list of sanitary surveys completed in FY07 to facilitate completion of the UEOS.	Completed as required.
	5.1.2 Ensure that inventory, sanitary survey, compliance, enforcement, and required sample data are reported to EPA	5.1.2.1 Ensure that violations of the SWTR resulting from systems’ not filtering when required to filter, are reported to EPA; if the SDWIS software prevents the state from uploading the data, the state will transmit the violation information to Region 8 via e-mail.	Violations of the SWTR were reported to SDWIS-FED with the quarterly uploads. Summary reports were also provided via E-mail pursuant to objective 2.1.2 of this PPA.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
		5.1.2.2 Ensure that all violations, enforcement actions and compliance codes are reported to SDWIS-FED quarterly. Ensure a quarterly upload by June 30, 2008.	A special data report was uploaded to SDWIS-Fed in mid June 2008.
6. Clean Water Act and Safe Drinking Water Act Integration Measures. Integration of two federal water quality regulations to better assess public water supply standards attainment and protect public health.			
6.1 Percent of surface waters that are: a) used as a drinking water source by a community water system and designated for public water supply use that b) are monitored biennially for attainment of that use. (FY07 SDW – 14; FY08 - None)	6.1.1 a) Determine number of surface water segments used as a drinking water source. b) Determine attainment of public water supply use designation.	6.1.1.1 a) Complete stream segment reach indexing (Activity 2.2.1.a) and linkage to ADB to identify surface water segments designated for public water supply use; b) Assist EPA to correctly identify locations of drinking water intakes; c) Utilize data in STORET to determine location of monitoring sites for 2007- 2008; d) Calculate percent of community water systems intakes for which source water assessed for drinking water use that are monitored biennially by 9/30/09.	6.1.1.1 a) Reach index completed for 2008 Integrated Report and delivered to EPA. b) Coordination with the EPA is in progress to correctly identify locations of drinking water intakes. The SWAP assessment data is available through the Division and data sharing with the EPA will be conducted in the near future. c) Information in STORET is regularly used in preparation of the annual monitoring plans. d) Thirty-nine (39) percent of community water systems intakes will be monitored biennially by 9/30/09. Colorado's monitoring schedule is only completed up to June 2009.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
6.2 Percent of surface waters that are a) used as a drinking water source by community water system that are b) listed as impaired for a drinking water use for which there is an EPA approved TMDL to address impairment and c) the percent of these impaired waters that have been fully restored. (FY07 SDW-15 I, R; FY08 - None)	6.2.1 a) Determine number of surface water segments used as a drinking water source. b) Determine surface water segments that are listed as impaired for drinking water use. c) Determine surface water segments listed as impaired for drinking water use that have been fully restored.	6.2.1.1 a) Complete stream segment reach indexing (Activity 2.2.1.a) and linkage to ADB to identify surface water segments designated for public water supply use; b) Assist EPA to correctly identify locations of drinking water intakes; c) Identify surface water segments used for community systems that are listed as impaired. d) Identify the number of surface water segments used for community systems that were listed as impaired in 1998 where a TMDL has been completed, and that have been restored on an annual basis.	6.2.1.1 a) Reach index completed for 2008 Integrated Report and delivered to EPA. b) Coordination with the EPA is in progress to correctly identify locations of drinking water intakes. The SWAP assessment data is available through the Division and data sharing with the EPA will be conducted in the near future. c) Zero (0) surface water segments used for community systems that are listed as impaired for drinking water use. d) Zero (0) surface water segments used for community systems that were listed as impaired in 1998, where a TMDL has been completed, and were fully restored on an annual basis.
6.3 Percent of waterbody impairments identified by States in 2002, in which there is a community water system intake and the impairment cause is for either a drinking water use or a pollutant that is regulated as a drinking water contaminant for which there is a TMDL. (FY08 SDW-10aI)	6.3.1 a) Determine number of surface water segments used as a drinking water source. b) Determine surface water segments that are listed as impaired for drinking water use. c) Determine surface water segments listed as impaired for drinking water use for which there is a TMDL.	6.3.1.1 Identify the number of surface water segments used for community systems that were listed as impaired in 1998 where a TMDL has been completed.	6.3.1.1 Zero (0) surface water segments used for community systems that were listed as impaired for drinking water use where a TMDL has been completed.

Water Quality Control Division Goals – Part II Safe Drinking Water Act			
Short-term Goals	Objective(s)	Milestone(s) / Performance Measure(s)	2008 Status and Accomplishments
6.4 Percent of waterbody impairments identified by States in 2002 in which there is a community water system intake and the impairment cause is for either a drinking water use or a pollutant that is regulated as a drinking water contaminant, for which the waterbody impairments have been restored. (FY08 SDW-10bI)	6.4.1 a) Determine number of surface water segments used as a drinking water source. b) Determine surface water segments that are listed as impaired for drinking water use. c) Determine surface water segments listed as impaired for drinking water use that have been fully restored.	6.4.1.1 Identify the number of surface water segments used for community systems that were listed as impaired in 1998 where a TMDL has been completed, and that have been restored on an annual basis.	6.4.1.1 Zero (0) surface water segments used for community systems that were listed as impaired in 1998 where a TMDL has been completed, and that have been fully restored on an annual basis.

Water: PWSS Program

ACS Code	Measure	Source of Data	Comment
2.1.1	Water Safe to Drink: Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through effective treatment and source water protection.	SDWIS	HQ will pull the data at the end of the fiscal year. Rolling 4 quarters (4Q of previous FY and the 1, 2, 3Q of the current FY)
A	Percent of the population served by community water systems that receive drinking water that meets health-based standards with which systems need to comply as of December 2001.	SDWIS	
B	Percent of the population served by community water systems that receive drinking water that meets health-based standards with a compliance date of January 2002 or later.	SDWIS	
C	Percent of community water systems that provide drinking water that meets health-based standards with which systems need to comply as of December 2001.	SDWIS Relates to PART Measure P-PWSS-2: Percent community water systems in compliance with drinking water standards.	
D	Percent of community water systems that provide drinking water that meet health-based standards with a compliance date of January 2002 or later.	SDWIS Relates to PART Measure P-PWSS-2: Percent community water systems in compliance with drinking water standards.	
F	Percent of source water areas for community water systems that achieve minimized risk to public health.	States manually report this measure to the Region.	The actual number of CWSs with substantial implementation of a SWP Plan is not tracked by SDWIS. CO, MT, ND and UT all track this measure. However, SD and WY are not currently tracking the number of CWSs meeting this measure. In the states that are tracking this measure, it is not being done in SDWIS but the states have individual databases that have this information available or that can be generated.
SDW-1a	Percent of community water systems (CWSs) that have undergone a sanitary survey within the past three years (five years for outstanding performers) as required under the Interim		States manually report this measure to the Region.

	Enhanced and Long-Term 1 Surface Water Treatment Rules.		
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Water: UIC Programs

ACS Code	Measure	Source of Data	Comment
SDW-9 (a, b, c, d)	Separately for each class of well, the percent of Class I, II, III wells identified in significant violation, and Class V wells identified in violation, that are addressed by the UIC program.	Form 7520-2A	Info not available until at least 45 days after end of reporting period
SDW-10	Percent of identified Class V Motor Vehicle Waste Disposal wells that are closed or permitted.	Form 7520-2B	Info not available until at least 45 days after end of reporting period

Water: CWA Section 106 Grants

ACS Code	Measure	Source of Data	Comment
L	Number, and national percent, of those waterbodies identified in 2000 as not attaining standards where water quality standards are restored. (cumulative)	WATERS	States submit data supporting measure L--integrated 305b/303d reports or 303d lists--every other year...OW will report on changes to measure L quarterly.
WQ-2 (a,b)	Number of States that have (a) adopted EPA-approved nutrient criteria into their water quality standards, or (b) are on schedule with a mutually agreed-upon plan to adopt nutrient criteria into their water quality standards. (cumulative)	Regional ACS report	For WQ-2a, the target is 0, so the state does not have to report for this measure.  For WQ-2b, CO, MT, UT should provide a brief update on the status of their activities related to nutrient criteria. (This is new). WY does not need to report—EPA will take the lead.
WQ-5a	Number, and national percent, of States that within the preceding three year period, submitted new or revised water quality criteria acceptable to EPA that reflects new scientific information from EPA or other resources not considered in the previous standards.	WATA	EPA lead. States are not responsible for reporting this measure.
WQ-7	Number of States that have adopted and are implementing their monitoring strategies in	S.106 Monitoring Initiative Workplans	States should submit an annual progress report (email is acceptable) to their EPA Monitoring and Assessment

ACS Code	Measure	Source of Data	Comment
	keeping with established schedules.		contact, stating progress and accomplishments on items listed in their 106 Monitoring Initiative Workplans.
WQ-13b	Number of TMDLs, and national percent, that are established by states on schedule consistent with national policy. [FY 06 WQ-12 relates to all TMDLs; FY 07 WQ-13b relates to state TMDLs]	NTTS	The Region enters data in NTTS when State TMDLs are approved
WQ-18a	Number, and national percent, of non-tribal NPDES permits that are considered current.	PCS or ICIS-NPDES for MT, SD, UT	83.2% of Colorado permits considered current.
WQ-19 (a, b, c)	Number, and national percent, of Phase I and Phase II storm water permits that are issued and current for: (a) industrial storm water general permits; (b) construction storm water general permits; and (c) MS-4 general and individual permits.	PCS or ICIS-NPDES for MT, SD, UT	SW General Permits - Certs as of 9/30/08: Light Industry: 739 Heavy Industry: 150 Construction >5 acres: 2700 Construction 1-5 acres: 1880 Sand & Gravel: 469 Metal Mining: 110 Recycling: 113 MS4, state-wide: 47 MS4, Cherry Creek Res Basin: 7 MS4, Non-Standard: 61  SW Individual Permits as of 9/30/08: Phase I MS4: 5 Industrial: 1  Number of Expired General SW Permits: 0  Number of Expired Individual SW Permits: 4
WQ-21a	Number, and national percent, of Significant Industrial Users (SIUs) in POTWs with Pretreatment Programs that have control mechanisms in place that implement applicable pretreatment requirements.	SIUs= PCS, or ICIS-NPDES for MT, SD, UT CIUs = Internal tracking system	EPA measure.
WQ-22a	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year.	PCS or ICIS-NPDES for MT, SD, UT	Note: HQ-OECA to provide state-specific data.

ACS Code	Measure	Source of Data	Comment
WQ-29a	Number, and national percent, of high priority state NPDES permits that are issued as scheduled.	PCS or ICIS-NPDES for MT, SD, UT	21 permits – 10% of high priority permits.
WQ-30a	Number of permits providing for trading between the discharger and other water pollution sources. (cumulative)	PCS or ICIS-NPDES for MT, SD, UT	None at this time.
SS-2	Number, and national percent, of CSO permits with schedules in place in permits or other enforceable mechanisms to implement approved Long Term Control Plans (LTCPs). (cumulative)	PCS-CSO Report Database or ICIS-NPDES for MT, SD, UT	N/A – Colorado has no CSOs.

Water: Nonpoint Source Program

ACS Code	Measure	Source of Data	Comment
WQ-16	Number of waterbodies identified by States (in 2000 or subsequent years) as being primarily NPS-impaired that are partially or fully restored. (cumulative)	WATERS	See 1 below.
WQ-27	Number of watershed-based plans supported under State Nonpoint Source Management Programs since the beginning of FY 2002 that have been substantially implemented. (cumulative)	STATES	See 2 below

1. By “fully restored,” EPA means that all designated uses are now being met. By “partially restored,” EPA means either of the following two conditions are being met:

- a) A water body that has a use that is initially impaired by more than one pollutant, but after restoration efforts meets the criteria for one or more (but not all) of those pollutants, or
- b) A water body that initially has more than one use that is less than fully supported, but after restoration efforts one or more (but not all) of those uses becomes fully supported.

Since the main referent for this measure will be State 303(d) or Integrated Reports, States which did not submit 2000 303(d) lists may substitute the 1998 list for their base year. “Water bodies” therefore refer to 303(d)-listed segments or Category 4 or 5 waters on the Integrated Report. The measure is not meant to include only water bodies restored by 319-funded projects, but instead counts all primarily NPS-impaired water bodies that a state restores subsequent to the base year of 1998/2000. The water must have been impaired as of the year 1998/2000.

Waters listed after 1998/2000 which are then delisted from the 303(d) list (for some or all pollutants) or which move from categories 4 or 5 to category 1 or 2 may also be counted against this measure. In other words, although 1998/2000 is the base year, the 303(d) lists for those years need not be the only referent lists.

Please note that a water cannot be counted simply because it has been delisted from a state 303(d) list, or moves from categories 4 or 5 to 1 or 2, for reasons other than actual restoration (e.g., it is determined that it was inappropriately listed in the first place, it has a TMDL done for it, etc.).

A water will not be counted towards this measure if no specific management activities have been taken (by any party) within the watershed to improve water quality. Furthermore, a given water cannot be counted twice under this measure if it goes from impaired to partially restored, and then from partially restored to fully restored. Any given water may only be counted once under this measure.

For a water to be counted as “partially or fully restored,” it must be described by a story on EPA’s NPS Success Story Website (<http://www.epa.gov/owow/nps/Success319/>). On the Success Stories web site, the heading “Stories about partially or fully restored water bodies” is the section that refers to this measure. Without such a story, the water will not be counted against this measure. A story may include more than one water body, where appropriate.

Success stories submitted for the States (or Tribes) must include the following:

- Title
- Problem
- Project highlights
- Results
- Partners and funding

- Photos and/or Table/graph/chart
- Contact information
- GRTS project number(s) (where applicable)
- Date delisted from 303(d) list, or list date it will be delisted (i.e. next 303(d) list)

The determination of whether or not a water is “primarily” NPS-impaired will be left to the best professional judgment of the States. EPA does not expect that the State should do a detailed analysis when making a judgment on whether a given water is “primarily” NPS-impaired, when a precise determination would be exceedingly difficult (such as, for example, when a single listed water moves through both permitted MS4 areas as well as through non-permitted areas).

2. Watershed-based plans are plans which include the “nine components” described in the “Nonpoint Source Program and Grants Guidelines for States and Territories” (October 2003) available at: <http://www.epa.gov/fedrgstr/EPA-WATER/2003/October/Day-23/w26755.htm>

These plans are primarily geared towards restoring impaired waters, though they should also address unimpaired but threatened waters as necessary.

“Substantially-implemented” means either of the following two things:

- a) Those actions called for in the initial plan (i.e., prior to any later adjustment to the plan that may be deemed necessary) specifically geared towards remediating the impairment(s) have been implemented. The plan in this case must include the nine components for watershed-based plans outlined in the NPS grants guidelines.
- b) Sufficient management measures and practices called for in the plan have been implemented to achieve the load reductions that are needed to meet WQS, even if the plan comes close to – but falls short of – including all nine criteria articulated in the NPS grants guidelines.

In the case of condition “b,” EPA and States may define what it is to be “close” to meeting the nine criteria. Furthermore, in terms of demonstrating that the implementation actions have met the load reduction target, if the State has a load reduction model it trusts that predicts that whatever actions that have been implemented should be sufficient to reach the load reduction target -- and the Region agrees with the State's judgment -- then this will be sufficient for meeting the bar of “substantially-implemented” for purposes of tracking against this measure. EPA reserves the right to ask the State to provide its evidence that the plan has met the second criterion for being a “substantially-implemented” plan.

Since watershed management typically necessitates an adaptive approach over time, watershed plans may never be fully implemented. Therefore, the term “substantially implemented” is being used.

Substantially-implemented plans are reported twice a year -- once by April 1 for a "mid-year" number, and once in September 1, for an "end-of-year" number.



## 7.0 HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

### Hazardous Waste Programs

**Mission:** To ensure that all hazardous wastes are handled and managed in ways that protect the public and the environment from the time of generation until final disposal or destruction. (Note: The Compliance Program and the Federal Facilities Program in the Hazardous Materials and Waste Management Division together implement the hazardous waste regulatory program).

HW I - General Program Management and Partnership			
HW 1: Long Term Goal Implement an efficient and effective hazardous waste regulatory program with adequate fiscal and personnel resources.			
Short Term Goals	Objective	Measures	Results
HW 2: Short Term Goal - Develop a partnership between the State and EPA that improves the program. Support this partnership and achieve efficient implementation of a hazardous waste program that reflects the goals and objectives of both the State and EPA including appropriate work sharing.	<b>Authorization</b> The State will pursue timely and complete authorization for new rules and progress toward overall authorization goals.	The State expects to submit the following new revision applications: <b>FY07:</b> • RCRA Cluster XVI (SPA 27) <b>FY08:</b> • RCRA Cluster XVII (SPA 28)	At the start of FY 2008, Colorado had adopted 100% of the required rules for the RCRA program. The State has also adopted many of the non-mandatory rules. During FY 2008, no new rules were required for adoption. As such, the State did not submit an authorization application to EPA in 2007.
	<i>EPA will work toward a timely review of authorization applications submitted and improve the overall pace of authorization and authorization flexibility.</i>		

HW I - General Program Management and Partnership			
	<b>Program Improvement</b> The State will continue to evaluate the Hazardous Waste Control Program seeking to make further program improvements as appropriate.	Continued implementation of self-certification programs and GAP site visits.	Both the GAP and self-certification program have continued. The state has invested a large amount of resources in the self-certification program – over 700 facilities participated in the program in 2008.
	<i>EPA, in conjunction with CDPHE and as resources allow, will perform RCRA Subtitle C financial assurance file reviews in FY06, which will determine the overall RCRA operator compliance with financial assurance requirements. In FY 2008, the State and EPA R8 will continue to review identified concerns and determine which concerns need follow-up, which agency will follow up, and appropriate compliance and enforcement.</i>		
	<b>Data Management</b> The State will maintain timely, accurate, and complete data in RCRAInfo.	The State will have data in RCRA Info by the 15 <sup>th</sup> day of the month following activity. The EPA EOY Report will be used to measure HMWMD's success.	The Division routinely met this expectation.
		The State will ensure that data is reported to RCRAInfo accurately and completely reflecting the status of the RCRA universe.	The Division routinely met this expectation.
	The State will continue to work with EPA to ensure that RCRAInfo reports used to track the progress of activity are accurate.	RCRAInfo reporting will include all key measures of operating, closure and post-closure permitting; corrective action; and compliance monitoring and enforcement components of the HW program at a level sufficient to support program evaluation efforts.	The Division routinely met this expectation.

HW I - General Program Management and Partnership			
	<i>EPA will assist the State in assuring that the RCRAInfo data is current and accurate and reflects EPA HW activities as well as State activities.</i>		
	<i>EPA will work with the State to resolve “universe” issues .</i>		
	<i>EPA will also provide training and technical assistance when requested.</i>		
	The State and EPA will jointly create and generate RCRAInfo reports that are of benefit to the program.		Both the Division and EPA routinely met this expectation.
	<b>Public Involvement.</b> The State will continue to involve the public as required by statute and regulation or MOA. This includes a system to respond to requests for information and complaints or concerns from the public. (HW-3-9)	CDPHE will: <ul style="list-style-type: none"> <li>• Consider participation as appropriate on EPA site-specific teams to evaluate environmental justice concerns.</li> <li>• Consider reporting efforts of public participation in reaching minority and low-income communities.</li> <li>• Consider the use of citizen advisory boards as specific situations warrant.</li> <li>• Participate in meetings with environmental groups as appropriate to consider environmental justice issues.</li> </ul>	No specific opportunities arose in FY08 although the Division continues to have several public information officers on staff that can assist in these types of activities.
	<b>Resource Level</b> The State will maintain adequate resources to implement the program.	Joint EOY Reports	The Division met this expectation.
	<b>Financial Accountability</b> The State will adequately account for grant dollars.	Joint EOY Reports	The Division met this expectation.

<b>HW I - General Program Management and Partnership</b>			
	<b>Program Guidance / Agreements</b> The State and EPA will jointly develop and maintain the MOA (annually re-certify), EA, Quality Assurance Plan and other operating Guidance.		The Division met this expectation.
	<b>Strategic Planning</b> The State and EPA will jointly plan and prioritize program goals, objectives and activities that address state and federal priorities and initiatives. Activities include EPPA development, Annual National targets, inspection strategies, planning meetings, etc.	EPA and the State will hold regular meetings to share information, identify and solve problems and engage in short term planning efforts.	The meetings were not 'regular' but were held whenever necessary.
	<b>Coordination of Joint Activities</b> The State and EPA will maintain a high level of cooperation between State and EPA staff to assure successful and effective administration of the program including evaluation of desirable technical support and targets for joint efforts / work sharing.	EPA and the State will hold regular meetings to share information, identify and solve problems and engage in short term planning efforts.	The meetings were not 'regular' but were held whenever necessary.
	<b>Program Communication</b> The State and EPA will maintain frequent and open communication on routine matters, changes in program capability, legislation and resources levels, emergency situations and other key activities as described in the MOA.	Examples of key activities include final decisions re: variances / waivers, enforcement actions, biennial report summarization, final permits, etc.	The meetings were not 'regular' but were held whenever necessary.
		EPA and the State will hold regular meetings to share information, identify and solve problems and engage in short term planning efforts.	The meetings were not 'regular' but were held whenever necessary.

<b>HW I - General Program Management and Partnership</b>			
	<b>Training and Technical Assistance</b> The State and EPA will jointly identify training and technical assistance needs.	The State will develop and implement a staff training program that results in well-qualified staff and ensures that mandatory training needs are met.	The Division continues to value well-qualified staff and obtaining appropriate training is a high priority.
		<i>EPA will make training and technical assistance available to the State and will work toward improving the capability to provide high quality training and technical assistance. Technical assistance will be made available through EPA staff, EPA research labs and EPA contractors.</i>	
	<i>EPA will conduct oversight of State program activities as appropriate.</i>	<i>Joint EOY Reports</i>	
HW 3: Short Term Goal – The State and EPA will work together to determine progress in identifying and achieving environmental indicators. Actions necessary to achieve environmental indicators will be planned and tracked. Determination documentation for those facilities “under control” will be provided by the State to EPA; EPA will, in turn, provide guidance for what constitutes “adequate documentation”.		See “Table HW IV” below.	See “Table HW IV” below.

<b>HW II Operating Permit and Closure/Post Closure Permit Goals</b>			
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**HW II  
Operating Permit and  
Closure/Post Closure Permit  
Goals**

**HW Operation Permit Universe Information:**

There is only one (1) commercial land disposal facility operating within the State; as of the end of FY 06, this facility has the required permit. There are eleven (11) operating commercial and non-commercial treatment / storage facilities operating in the State; as of the end of FY 06 all required operating permits have been issued, but 1 unit at 1 facility (Ft. Carson) still needs to be added to that permit. Currently, there are no (0) operating combustion units within the State. The Pueblo Chemical Depot has submitted a permit application for additional proposed units related to their chemical demilitarization facility. That permit application is under review, but the facility has not yet been fully funded by Congress.

Short Term Goals	Objective	Measures	Results
HW 4: Short Term Goal: Issue operating permits, closure permits, and post closure permits that include conditions necessary to assure that hazardous wastes are managed in ways that protect the public health and environmental quality.	<b>Operating Permit Activities.</b> The State will demonstrate progress toward achieving operating permits (OP) program goals, objectives and activities identified in jointly developed strategies that reflect State and EPA OP priorities.	The Key Measure of the OP process is: <ul style="list-style-type: none"> <li>• OP200 – final determinations / renewal determinations.</li> </ul> Supporting Measures include: <ul style="list-style-type: none"> <li>• OP100 – review activities resulting in a determination or notice of deficiency:</li> <li>• OP240 – permit modifications; and</li> <li>• Emergency Permits.</li> </ul>	<b>FY07:</b> No (0) final permit decisions or permit renewals were accomplished or needed for treatment, storage, or disposal facilities. <b>FY08:</b> No (0) final permit decisions or permit renewals were accomplished or needed for treatment, storage, or disposal facilities.
		The following output is planned: <b>FY07:</b> No (0) treatment, storage and disposal facility is anticipated to require operating permit final determination or renewal. The 1 unit (OD unit) at Ft Carson will be added to their permit. <b>FY08:</b> No (0) treatment, storage and disposal facility is anticipated to require operating permit final determination or renewal	

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<b>HW II</b> <b>Operating Permit and</b> <b>Closure/Post Closure Permit</b> <b>Goals</b>			
	Permit maintenance; permit modifications, and emergency permits will be processed as required.	Permit modifications and emergency permits will be processed as received and required.	The Division met this requirement.
	<i>EPA will conduct operating permit activities according to the joint permitting process described in the authorization memorandum of agreement.</i>		
	<i>EPA will provide technical assistance where requested.</i>		
<b>HW Closure Universe Information:</b> There are or have been thirty three (33) treatment/storage/disposal facilities with land disposal units on the closure track, and seventy-six (76) land disposal units at these facilities. Ten (10) of the 76 land disposal units still require approved closure plans. Many more still need closure certification and agency verifications. Sixty-seven (67) treatment/storage/disposal facilities have treatment or storage units on the closure track. Most of these treatment or storage units had their closure plans approved. Three (3) of the four (4) treatment/storage/disposal facilities with combustion units have completed the closure process.			
<b>HW 4 (cont'd)</b> Issue operating permits	<b>Closure Activities –</b> The State will demonstrate progress toward achieving closure (CL) program goals.	The Key Measure for closure activities is: <ul style="list-style-type: none"> <li>• CL360 - Closure plan approval.</li> <li>• CL380 - Closure verification</li> <li>• CL370 - Closure certification</li> </ul>	<b>FY07:</b> No (0) closure plan approvals, verifications, or certifications were approved. <b>FY08:</b> No (0) closure plans, verifications, or certifications were approved.
		The following outputs are planned: <b>FY07 and FY08:</b> No (0) treatment / storage units will receive closure plan approval No (0) treatment / storage units will receive closure verification No (0) closure certifications will be approved.	

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<b>HW II</b> <b>Operating Permit and</b> <b>Closure/Post Closure Permit</b> <b>Goals</b>			
	<i>EPA will participate in closure determinations through joint activities and providing technical assistance where requested</i>		
<b>HW Post-Closure Universe Information</b> There are fourteen (14) facilities in the post-closure universe in the state as of the end of FY04. The Division has lead for 11 of these facilities. Ten (10) of the 11 state-lead facilities have received the required post-closure permits or other approved controls are in place. The remaining facility is abandoned with no viable owner/operator. The state is monitoring this facility.			
<b>HW 4 (cont'd)</b> Issue operating permits	<b>Post-Closure Activities –</b> The State will demonstrate program progress toward achieving post-closure (P-C) program goals, objectives and activities that reflect State and EPA P-C priorities.	The Key Measure is: <ul style="list-style-type: none"> <li>• PC200 – final post-closure permit determinations/ issuances. Post-Closure plan approvals, or other approved controls for all applicable units at facilities in the GPRA post-closure universe.</li> </ul> Supporting measures are: <ul style="list-style-type: none"> <li>• PC200 – other final post-closure permit determinations / issuances.</li> <li>• PC010 – post closure permit call-ins.</li> </ul>	<b>FY07:</b> One (1) post-closure permits was renewed (CSU Landfill).  <b>FY08:</b> No (0) post-closure permits were renewed.

HW II Operating Permit and Closure/Post Closure Permit Goals				
		<p>The following major outputs are planned: <b>FY07:</b></p> <p>One (1) post-closure permits will be renewed (CSU Landfill)</p> <p>No (0) other final or other post-closure permit determinations / issuances are expected.</p> <p>No (0) post-closure permit call-ins are expected.</p> <p><b>FY08:</b></p> <p>No (0) post-closure permits will be renewed</p> <p>No (0) other final or other post-closure permit determinations / issuances are expected.</p> <p>No (0) post-closure permit call-ins are expected.</p>		<p>← Formatted: Bullets and Numbering</p> <p>← Formatted: Bullets and Numbering</p>
	The State will update facility-specific strategies that lay out when each remaining TSDF is expected to have all post-closure controls in place.		The only facility without post-closure controls in place is the Rockwool facility, an abandoned facility with no competent owner or operator. The Division performs monitoring of the ground water and inspection of the landfill cap.	
	<i>EPA will participate through joint activities and by providing technical assistance as requested.</i>			

<b>HW II Operating Permit and Closure/Post Closure Permit Goals</b>			
HW 5: Short term Goal Develop mechanisms to improve state-to-state cooperation on permitting of promising innovative waste remediation technologies and the development of such technologies.	HW 2.1.3 Participate in Interstate Technology and Regulatory Cooperation Workgroup.		The Division met this requirement.
<i>EPA will conduct oversight of State operating, closure, and post-closure permitting activities.</i>			

<b>HW III Compliance Monitoring and Enforcement Goals</b>			
HW 6: Long Term Goal Ensure protection of public health and environment through achieving compliance of regulated facilities by implementation of an effective monitoring and enforcement program. Detect and deter violations through inspections and enforcement actions and promote compliance with hazardous waste requirements.			
Outcome Measures: Return to compliance after enforcement is an important measure of the effectiveness for the enforcement and inspection program. Informal and formal enforcement actions issued in the reporting year are used as the basis for this measure. The measure is the percentage of compliance requirements that are met during the reporting year that they fall due.			
Short Term Goals	Objective	Measures	Results
HW 6.1: Short Term Goal Ensure that annual inspection requirements are achieved and that inspections are of high quality. Inspections of treatment, storage and disposal facilities will meet the	All federal, state, and local facilities will be inspected. Inspections of state and local facilities will be conducted jointly with EPA, with EPA acting as the lead in the inspections.	During FY07 and FY08, 100% of the compliance inspections required by statute will be conducted. Also, inspections projected for Table X of the MOA between EPA/Region 8 and EPA/OECA will be conducted.	All (100%) of required inspections were performed. The inspection plan for FY09 was submitted to EPA by November 15, 2008.  The Division met this requirement.

<b>HW III Compliance Monitoring and Enforcement Goals</b>			
statutory requirements.	All active land disposal facilities will be inspected. All those in post-closure will be inspected if they were not inspected during FY 2005-06.	CDPHE will submit to EPA, by November 15 of each year, an inspection work plan for the upcoming federal fiscal year, which includes the names of TSD and LQG facilities.	All active land disposal facilities were inspected in FY08 and all facilities not inspection in FY07 were inspected. The Division met this requirement.
	Ground water monitoring inspections will be conducted at active land disposal facilities that have not had such inspections in the previous two years.		All required O&M inspections were performed. The Division met this requirement.
	All treatment and storage facilities will be inspected if they were not inspected during FY 2007.		
	Other Priority Inspection Areas - Permit Evaders - Mineral Processors	A minimum of twenty percent (20 %) of all large quantity generators (LQGs) will be inspected during each federal fiscal year.	A total of 68 LQGs were inspected in FY07. This represents about 62% of the LQG universe. The Division met this requirement.
HW 6.2: Short Term Goal Maintain a high level of expertise to ensure that quality inspections consistent with national guidance are being conducted.	High quality inspections will be conducted in accordance with national guidance to be reviewed jointly by the State and EPA in the annual assessment.	EPA EOY Report; EPA State Review Framework Evaluation	The Division met this requirement.
<i>EPA Region 8 will continue to implement the CERCLA Off-Site Rule (OSR). EPA will continue to coordinate closely with the state in this implementation.</i>			

<b>HW III Compliance Monitoring and Enforcement Goals</b>			
<b>HW 6.3: Short Term Goal</b> Promote compliance of regulated facilities by ensuring that enforcement actions are timely and. Actions necessary to assure return to compliance (RTC) and consistent with the Enforcement Response Policy will be documented.	Informal actions will be taken as appropriate within the timeframes established in the HMWMD Enforcement Response Policy.	Compliance Advisories (informal enforcement mechanism) will be used as appropriate for the violation and consistent with the Enforcement Agreement.	72 Compliance Advisories were issued in FY07. 100% were issued in a timely manner. The Division met this requirement.
	Document long- term maintenance of compliance after formal enforcement.		The Division tracks the rate that facilities return to compliance after a formal enforcement action. In FY08, 86.8% of the requirements of formal actions were complied with after the action was issued. The Division met this requirement.
	Formal enforcement actions, such as administrative orders, judicial referrals and referrals to EPA, will be taken as appropriate and within the time frames established in the MOA and the HMWMD Enforcement Response Policy.	Formal enforcement actions will include the use of compliance schedules, assessment of penalties, and escalation of enforcement action as appropriate for the violation and consistent with the Enforcement Response Policy.	The division finalized 23 formal enforcement actions in FY08. All were finalized within ERP and EPA timeframes. All included appropriate compliance schedules and penalties.
	Enforcement follow-up and other activities will be conducted in accordance with the MOA between the State and EPA / Region 8 to assure return to compliance.	Follow-up will include compliance schedules, stipulated penalties, follow-up inspections, and compliance assistance and / or escalation of enforcement responses as appropriate and consistent with the Enforcement Response Policy.	The Division met this requirement.
		The State and EPA will share any information that is collected regarding the environment and / or public health benefits achieved through inspection and enforcement activities.	The Division met this requirement.
<i>EPA and the State will work jointly to assure that the review of</i>	<i>EPA will conduct mid-year and end of year file reviews to document the</i>	The State and EPA will have regular coordination meetings to discuss the	The meetings were not 'regular' but were held whenever necessary.

<b>HW III</b> <b>Compliance Monitoring and Enforcement Goals</b>			
<i>enforcement actions is timely and appropriate in accordance with the Enforcement Response Policy. Actions necessary to assure return to compliance (RTC) and consistent with the Enforcement Response Policy will be documented.</i>	<i>progress CDPHE has made on timeliness of enforcement actions and the appropriate assessment and collection of penalties, including gravity, economic benefit and multi-day penalties.</i>	compliance and enforcement program. EPA's EOY Report and EPA's State Review Framework Evaluation will be used to judge the quality of HMWMD's Program.	
<i>EPA and the State will work jointly to develop the best way to address SNC determinations and the timeliness of those determinations</i>			

<b>HW IV</b> <b>Corrective Action Goals</b>			
Corrective Action GPRA Universe Information: There are seventy (70) TSD facilities in Colorado subject to corrective action. Of those facilities, all have been assessed - the RFA is complete ( <b>CA050</b> ), and all have been prioritized ( <b>CA075</b> ), according to RCRAInfo.			
Short Term Goals	Objective	Measures	Results
HW 7: Long Term Goal Clean up releases of hazardous waste that threaten the public or the environment.	<b>Corrective Action Identification and Ranking</b> The State will demonstrate progress toward achieving corrective action program identification ranking goals, objectives and activities that reflect State and EPA priorities.	The Key Measures for corrective action progress are: <ul style="list-style-type: none"> <li>• CA 050 –assessment completed;</li> <li>• CA 070 – determination of need for RFI; and</li> <li>• CA 075 – corrective action universe ranking.</li> </ul>	
		The following outputs are planned: <b>FY07 and FY08:</b> All assessment and ranking activities have been completed; therefore, no activities are planned	<b>FY07:</b> Assessment completed: 4 <b>FY08:</b> Assessment completed: 2
	<i>EPA will provide technical assistance in identification and ranking activities as appropriate.</i>		
GPRA Corrective Action Universe Information: There are thirty-three (33) facilities in the GPRA 2008 Corrective Action Baseline. All 33 have had the CA process started with at least a RCRA Facility Investigation (RFI) imposed ( <b>CA100</b> ) for at least one area. Twenty-seven (27) have had RFIs approved ( <b>CA200</b> ) for at least one area. Twenty-four (24) have had a remedy selected ( <b>CA400</b> ) for at least one area. Twenty-one (21) have had a remedy construction completed ( <b>CA550</b> ).			
HW 7: Long Term Goal Clean up releases	<b>Corrective Action Progress</b> The State and EPA will demonstrate progress toward achieving corrective action program goals, objectives and activities that reflect State and EPA priorities. Emphasis will be placed on high-ranked facilities.	The Key Measures for Corrective Action are the following activities: <ul style="list-style-type: none"> <li>• CA100 – Initial RCRA Facility Investigation (RFI) imposed;</li> <li>• CA100 – Subsequent RFI imposed;</li> <li>• CA150 – RFI work plan approved;</li> <li>• CA200 – RFI approved</li> <li>• CA300 – Corrective Measure Study</li> </ul>	

<b>HW IV</b> <b>Corrective Action Goals</b>			
		(CMS) work plan approved; • CA350 – CMS approved; • CA400 - Remedy Selection • CA500 – Corrective Measure (CM) work plan approved; • CA550 - Corrective Measures implemented (CMI), construction completed • CA999 – Corrective Action complete	
HW 7: Long Term Goal Clean up releases ....	<b>Corrective Action Progress (Cont'd)</b>	The following key outputs are planned: <b>FY07: (FF=Federal facilities; HWCA=non-Federal facilities)</b> • Initial RFI imposed – None (0) • Subsequent RFI imposed – None (0) • RFI work plan approved – Eleven (11 - HWCA) • RFI approved – Twenty-one (6 – FF; 15 - HWCA) • CMS work plan approved – Six (6 – HWCA) • CMS approved – Nineteen (2 – FF; 17 - HWCA) • Remedy selected (unit level) – Eleven (5 – FF; 6 - HWCA) • Remedy selected (facility level) – One (1 - HWCA) • CM work plan approved – Eight (1 – FF; 7 - HWCA) • CMI Construction Completed (unit level) – Two (2 – FF) • CMI Construction Completed (facility level) – None (0)	<b>FY07:</b> • RFI imposed – 4 (3 – HWCA, 1 – FF) • RFI work plan approved – 15 (15 - HWCA) • RFI approved – 24 (9 – FF; 15 - HWCA) • CMS work plan approved – 15 (4 – FF; 11 – HWCA) • CMS approved – 19 (2 – FF; 17 - HWCA) • Remedy selected (unit level) – 22 (14 – FF; 8 - HWCA) • Remedy selected (facility level) – 2 (2- HWCA) • CM work plan approved – 11 (1 – FF; 10 - HWCA) • CMI Construction Completed (unit level) – 22 (15 – FF; 7 – HWCA) • CMI Construction Completed (facility level) – 2 (1 – FF; 1 – HWCA)

HW IV Corrective Action Goals			
		<b>FY08:</b> <ul style="list-style-type: none"> <li>• Initial RFI imposed – All have been imposed; none (0)</li> <li>• Subsequent RFI imposed – None (0)</li> <li>• RFI work plan approved – 2</li> <li>• RFI approved – 9</li> <li>• CMS work plan approved – None (0)</li> <li>• CMS approved – 46</li> <li>• Remedy selected (unit level) – 60</li> <li>• Remedy selected (facility level) – None (0)</li> <li>• CM work plan approved – None (0)</li> <li>• CMI construction completed (unit level) – 7</li> <li>• CMI Construction Completed (facility level) – 1</li> </ul>	<b>FY08:</b> <ul style="list-style-type: none"> <li>• RFI imposed – 4</li> <li>• RFI work plan approved – 12</li> <li>• RFI approved – 28</li> <li>• CMS work plan approved – 10</li> <li>• CMS approved – 60</li> <li>• Remedy selected (unit level) – 90</li> <li>• Remedy selected (facility level) – 1</li> <li>• CM work plan approved – 21</li> <li>• CMI Construction Completed (unit level) – 21</li> <li>• CMI Construction Completed (facility level) – None (0)</li> </ul>
	<i>EPA will conduct corrective action activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate. Specifically EPA has assumed the lead for corrective action at two (2) facilities, both are anticipated to become a state- lead facility.</i>	<i>EPA plans the following outputs during FY 06 Initial RFI imposed – None (0) planned Subsequent RFI imposed – None (0) imposed RFI approved – One (1) planned Remedy Selected – One (1) planned CMI construction completed – None (0) planned</i>	
<b>Stabilization Universe Information</b> Twenty (20) of the thirty-one (31) high-ranked CA baseline universe facilities are in the stabilization universe. That is, the stabilization measures evaluation (CA225) resulted in a finding that stabilization measures are appropriate or are not required. Stabilization measures have been imposed (CA600) at nineteen (19) of the facilities. Stabilization construction completion (CA650) has occurred at fifteen (15) facilities.			

HW IV Corrective Action Goals			
HW 7: Long Term Goal Clean up releases ....	<b>Stabilization Activities (Interim Measures) -</b> The State will demonstrate progress towards achieving stabilization program goals, objectives and activities that reflect State and EPA priorities. Emphasis will be on increasing the number of facilities at which current human exposures and releases to ground water have been controlled and on facilities that are ranked as “high”.	The Key Measures are the following stabilization activities: <ul style="list-style-type: none"> <li>• CA225 - Stabilization Measures Evaluation</li> <li>• CA600 - Stabilization Implemented</li> <li>• CA650 - Stabilization Construction completed</li> </ul>	
	Stabilization Activities (Interim Measures) Cont'd	The following stabilization outputs are planned: <b>FY07:</b> <ul style="list-style-type: none"> <li>• Stabilization Measure Evaluations – None (0) planned</li> <li>• Stabilization implemented – None (0) planned</li> <li>• Stabilization Construction Complete –One (1 - HWCA)</li> </ul> <b>FY08:</b> <ul style="list-style-type: none"> <li>• Stabilization Measure Evaluations – None (0) planned</li> <li>• Stabilization implemented – None (0) planned</li> <li>• Stabilization Construction Complete – None (0) planned</li> </ul>	<b>FY07:</b> <ul style="list-style-type: none"> <li>• Stabilization Measure Evaluations – 0</li> <li>• Stabilization implemented – 7 (7 – HWCA)</li> <li>• Stabilization Construction Complete – 4 (4 - HWCA)</li> </ul> <b>FY08:</b> <ul style="list-style-type: none"> <li>• Stabilization Measure Evaluations – 0</li> <li>• Stabilization implemented – 2</li> <li>• Stabilization Construction Complete – 27</li> </ul>

<b>HW IV Corrective Action Goals</b>			
	<i>EPA will conduct Stabilization activities at EPA-lead facilities and will conduct joint activities and provide technical assistance, as appropriate.</i>	<i>EPA plans the following outputs during FY 06 Stabilization Measure Evaluations – None (0) planned Stabilization implemented – One (1) planned Stabilization Construction Complete – None (0)</i>	
<p>HW Indicator 2</p> <p>The State will continue to evaluate the number and percentage of facilities with human exposures under control (<b>CA725</b>).</p> <p>Note: The definition of “under control” is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.</p>			
<p>GPRA Corrective Action Universe Information:</p> <p>There are Thirty-three (33) facilities in the GPRA Corrective Action Baseline. Thirty (31) of these 33 are under control with regard to human exposure as of the end of FY08.</p>			
HW 7: Long Term Goal Clean up releases ....	The state will work to get human exposure under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator.	<p>The Key Output is the number of GPRA Baseline facilities at which human exposures are under control (CA725). The following Key Outputs are planned:</p> <p><b>FY07:</b></p> <ul style="list-style-type: none"> <li>No (0) facilities are projected to achieve this environmental indicator</li> </ul> <p><b>FY08:</b></p> <ul style="list-style-type: none"> <li>No (0) facilities are projected to achieve this environmental indicator</li> </ul>	<p><b>FY07:</b></p> <p>No facilities achieved this environmental indicator.</p> <p><b>FY08:</b></p> <p>No facilities achieved this environmental indicator.</p>

HW IV Corrective Action Goals			
	The State will update the facility-specific strategies, identifying when each high –ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.	The cumulative total in Colorado at the conclusion of FY07 will be 94% and at the end of FY08 will be 94%.	<b>FY07:</b> At the end of FY08, 94% (31 of 33) of the Baseline facilities have met this environmental indicator.  <b>FY08:</b> At the end of FY08, 94% (31 of 33) of the Baseline facilities have met this environmental indicator.
<i>EPA has a national goal of having human exposures controlled at 95% of the GPRA Baseline facilities by FY 2005 (HW-11-24)</i>	<i>EPA will work to get human exposures under control at EPA-lead facilities and will provide technical assistance as appropriate.</i>	<i>No (0) additional EPA-lead facilities are projected to achieve this environmental indicator in FY07 or FY08.</i>	
	<i>EPA will update facility-specific strategies, identifying when each high –ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.</i>		
HW Indicator 2 The State will continue to evaluate the number and percentage of facilities with ground water releases under control ( <b>CA750</b> ). Note: The definition of “under control” is in USEPA Region 8 RCRAInfo Definition Table, and in EPA guidance (2/5/99) for RCRA corrective action environmental indicators.			
GPRA Corrective Action Universe Information: There are Thirty-three (33) facilities in the GPRA Corrective Action Baseline. Thirty-two (32) of these 33 are under control with regard to ground water releases as of the end of FY08.			

HW IV Corrective Action Goals			
HW 7: Long Term Goal Clean up releases.	The state will work to get the migration of contaminated ground water under control at facilities subject to corrective action. Documentation will be submitted to EPA for all facilities that have achieved this environmental indicator.	<p>The Key Measure is the number of GPRA Baseline facilities at which migration of contaminated ground water are under control (CA750). The following Key Outputs are planned:</p> <p><b>FY07:</b></p> <ul style="list-style-type: none"> <li>No (0) facilities are projected to achieve this environmental indicator</li> </ul> <p><b>FY08:</b></p> <ul style="list-style-type: none"> <li>No (0) facilities are projected to achieve this environmental indicator</li> </ul>	<p><b>FY07:</b> The Division did not achieve this environmental indicator at any facilities, but EPA did achieve it for their single EPA-lead facility.</p> <p><b>FY08:</b> The Division did not achieve this environmental indicator at any facilities, but EPA did achieve it for their single EPA-lead facility.</p>
	The State will update the facility-specific strategies, identifying when each high –ranked corrective action facility presently not under control is anticipated to meet this environmental indicator and to develop plans to achieve all projected Environmental Indicators.	The cumulative total in Colorado at the conclusion of FY07 will be 97% and at the end of FY08 will be 97%.	<p><b>FY07:</b> At the end of FY07, 97% (32 of 33) of the Baseline facilities have met this environmental indicator.</p> <p><b>FY08:</b> At the end of FY08, 97% (32 of 33) of the Baseline facilities have met this environmental indicator.</p>
<i>EPA has a national goal of having human exposures controlled at 95% of the GPRA Baseline facilities by FY 2005 (HW-11-24)</i>	<i>EPA will work to get ground water releases under control at EPA-lead facilities and will provide technical assistance as appropriate.</i>	<i>No (0) additional EPA-lead facilities are projected to achieve this environmental indicator in FY07 or FY08.</i>	<b>FY07:</b> <i>One facility achieved this environmental indicator.</i>

<b>HW V Pollution Prevention &amp; Compliance Assistance Goals</b>			
<b>HW 8: Long Term Goal</b> Implement a compliance assistance program that increases the compliance rate within HMWMD's regulated communities.			
Short Term Goals	Objective	Measures	Results
	Continue to develop and use resources for compliance assistance.		
	A routine schedule of compliance assistance seminars, workshops and training sessions will be established. Trainings provide compliance guidance to attendees.	Presentation of hazardous waste compliance assistance seminars, workshops, and/or training sessions: <ul style="list-style-type: none"> <li>Estimate 15 to 20 sessions with 1000 attendees each federal fiscal year.</li> </ul>	The Division provided 30 compliance assistance / pollution prevention training sessions, reaching 1547 people.
	Site visits will be made to provide compliance assistance to selected individual businesses that request assistance or that are identified during routine hazardous waste inspections.	Implementation of the Generator Assistance Program (GAP).	In FY08, the Division continued the Generator Assistance Program ("GAP") providing direct on-site compliance assistance and pollution prevention assistance site visits to 7 interested hazardous waste generators.
<b>HW 9: Long Term Goal</b> Implement a pollution prevention program that encourages reduction of the amount and toxicity of wastes generated through waste minimization, treatment, and recycling of hazardous wastes, thereby reducing the risks associated with waste management. Methods for tracking and quantifying the accomplishments of these efforts will continue to be developed.			
	A schedule of pollution prevention seminars, workshops and training sessions will be established. These events will often be included with compliance assistance and outreach efforts.	Done in conjunction with compliance assistance.	The Division met this requirement.

<b>HW V Pollution Prevention &amp; Compliance Assistance Goals</b>			
	Distribute pollution prevention information and guidance documents in response to specific requests.	Done in conjunction with compliance assistance.	The Division met this requirement.
	Distribute pollution prevention information with requests for EPA identification numbers.		The Division met this requirement.
<b>HW 10: Long Term Goal</b> Integrate compliance assistance, waste minimization, pollution prevention, waste diversion, and recycling into all program activities and support waste minimization efforts statewide.			
	Develop and implement compliance assistance elements within the inspection and enforcement processes.	Provide direct compliance assistance in inspections: <ul style="list-style-type: none"> <li>Estimate 50 inspections in each federal fiscal year.</li> </ul>	
	Provide pollution prevention training to hazardous waste inspectors and permit writers.		The Division met this requirement.
	Distribute pollution prevention information and guidance documents in response to specific requests.	Done in conjunction with compliance assistance.	The Division met this requirement.
	Provide pollution prevention training to hazardous waste inspectors and permit writers.		The Division met this requirement.
	Support and maintain the technical assistance phone system.	<ul style="list-style-type: none"> <li>Estimate 3000 responses during each federal fiscal year.</li> </ul>	The Division's Technical Assistance Phone System responded to 2542 calls and 538 emails during the year.

HW V Pollution Prevention & Compliance Assistance Goals			
	Provide field assistance, consultative services, and trainings on chemical hazards for emergency response agencies as requested.		The Division met this requirement.
	On the CDPHE homepage, provide updates in the hazardous waste activities and access to current compliance assistance and pollution prevention materials and documents.	<ul style="list-style-type: none"> <li>• Maintain homepage information and track usage by Division customers</li> <li>• Estimate 600,000 contacts during each federal fiscal year.</li> </ul>	The Division's homepage was often updated during FY 2007 and received 1,386,109 hits.
<i>EPA has a goal of reducing the most persistent and bio-accumulative toxic chemicals (PBTs) in the hazardous waste streams by 50% by 2005 as compared to a baseline year of 1991</i>	PBT profiles for Colorado prepared by EPA will be used to focus waste minimization and reduction efforts including the use of SEPs and will be coordinated with those of CDPHE Pollution Prevention efforts.	Reduction of PBT chemicals in wastes will be tracked using TRI data for Colorado.	The Division did not perform any specific activities associated with this objective in FY07.
<i>EPA has a goal of reducing the most persistent and bio-accumulative toxic chemicals ....</i>	<i>EPA will provide information to the State, as it becomes available, regarding the measurement of PBT chemicals in the waste streams, implementation techniques and any other information regarding achieving these goals.</i>	EPA and CDPHE will continue joint evaluation of the hazardous waste generation data contained in the State Profile Report to identify opportunities to improve the overall utilization of the Profile.	The Division met this requirement.
<i>EPA has a goal of reducing the most persistent and bio-accumulative toxic chemicals.</i>	<i>EPA will provide information to the State, as it becomes available, regarding the measurement of PBT chemicals in the waste streams, implementation techniques and any other information regarding achieving these goals.</i>	EPA and CDPHE will continue joint evaluation of the hazardous waste generation data contained in the State Profile Report to identify opportunities to improve the overall utilization of the Profile.	The Division met this requirement.

<b>HW V</b> <b>Pollution Prevention &amp;</b> <b>Compliance Assistance Goals</b>
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<i>EPA will continue to support the environmental Compliance Assistance Center (ECAC) for all auto service businesses that request compliance assistance information. The center is based in Colorado and is available to all states.</i>
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## Solid Waste Program

**Mission:** To protect the environment and human health through efficient, equitable and ethical implementation of Colorado's solid waste statute and regulations; to assist citizens and local governments in providing integrated solid waste management that is effective and safe, through promotion of waste minimization, recycling and environmentally sound disposal practices and in promoting the effective cleanup of unauthorized and contaminated disposal sites.

Solid Waste Program Goals			
SW Indicator 1: The amount of solid waste generated by region and per capita will be tracked and reported.		Solid waste volumes will be posted on the CDPHE Home Page.	
SW 1: Long Term Goal Implement an efficient and effective solid waste regulatory program with adequate fiscal and personnel resources.			
SW 2: Long Term Goal Integrate waste minimization, pollution prevention, waste diversion, and recycling into all regulatory and remedial activities and support waste reduction statewide with a focus on municipal solid waste, industrial materials recycling, and electronic waste.			
SW 3: Long Term Goal Provide regulatory assistance to businesses and local governments.			
SW 4: Long Term Goal Provide education and outreach concerning solid waste issues.			
Short Term Goals	Objective	Measures	Results
SW 4.1 Provide information on alternative technologies to local government officials and landfill owner/operators.	Continue forums on waste issues.	Formal events, such as trainings given or participated in with facility owners / operators and / or the general public will be cataloged. Participate in at least 2 post-closure care related trainings.	CDPHE hosted e-training on the Tire Hauler (Section 15) and the Landfill Ban (Section 16) regulations, ITRC guidance and training on Ecological Land Reuse, Bioreactors, and Optimizing or ending Post-Closure Care. In addition, solid waste staff presented on the state of recycling in Colorado at the 2008 Recycling Summit and the Colorado SWANA conference.
	EPA will provide access to national training and information (e.g., publications, satellite forums) on household hazardous waste, financial assurance, and other solid waste issues.		

Solid Waste Program Goals			
SW 4.2 Encourage and support local government decisions that extend existing disposal alternatives and capacity beyond landfilling to composting, recycling, etc.	Encourage and assist local government with networking solid waste management issues. Provide technical assistance and information when requested and through stakeholder outreach processes.	Initiate and maintain local government communication forum.	CDPHE worked with counties and municipalities to create combination landfill/compost facilities. Solid waste data management staff initiated additional outreach efforts with counties and municipalities to discuss their current recycling opportunities and provide information on additional recycling options. .
SW 4.3 Educate individual citizens about waste reduction strategies with an initial emphasis on recycling and reduction of HHW generation.	Prepare or purchase informative materials that identify alternatives to waste disposal and eliminate/minimize toxic household wastes.	Continue to revise and update the website with up-to-date and comprehensive information that citizens can utilize.	CDPHE's website is continually being updated with the best information available. There is a specific portion of the website covering HHHW. SW is developing a standalone recycling web site. This should be operation by lat spring 2009. The new web page will include a Beneficial Use Directory, general recycling information, the annual Colorado's State of Material Management report, and Colorado's recycling statistics.
SW 4.4 Encourage local programs to exclude HHW from disposal in Municipal Solid Waste (MSW) landfills.	<i>EPA will provide access to national training and information (e.g., publications, satellite forums) on household hazardous waste, financial assurance, and other solid waste issues.</i>	Coordinate with the hazardous waste program in developing HHW collection/diversion events, alternatives to throwing HHW in the trash, etc. Evaluate the potential of using regional collection centers.	CDPHE continues to reinforce the 2007 landfill ban regulations related to lead acid battery, used oil, and waste tire collection centers. Exploring opportunity to manage HHW at the collection centers and foster increased materials re-use. SW continues to work with facilities to find funding mechanism to support HHW collection centers co-located at landfills.
SW Indicator 2: The amount of solid waste recycled by region and per capita will be tracked and reported.		Solid waste volumes will be posted on the HMWMD Home Page.	

Solid Waste Program Goals			
<p>SW Indicator 3:  Number of waste sites and kind of waste management, treatment and disposal mechanisms in use in the state will be tracked and reported as well as their compliance status. Also, the remaining disposal volume and longevity of each site and type of site composite will be tracked.</p>			
<p>SW 5: Long Term Goal  Develop an appropriate and sustainable set of performance indicators for solid waste and initiate tracking and reporting efforts in support of the same.</p>	<p>Improve industrial / commercial waste minimization and pollution prevention efforts and support composting and recycling.</p>	<p>HMWMD will continue to refine the data available to measure progress toward its goals. HMWMD will use the data to document volumes and related information and track trends.</p> <p>Total solid waste volume data will be maintained on the HMWMD Webpage. Data for calendar years 1995 to 2005 is available and will be updated annually. Recycling, scrap tire and composting data will be added annually.</p>	<p>CDPHE expanded partnering with recycling entities and posting web-links to recycling facilities. CDPHE will be expanding and posting its BUD information and conducted its first regional outreach meeting in Fort Morgan on December 12, 2008. This is part of a regionalized outreach effort. Centerpieces of these presentations to the local include material recycling and reuse along with composting. Both of these emphasize material reuse. Measurement metrics will be included in Colorado's State of Material Management report, which will be posted to the solid waste web page by January 2009.</p>
	<p>Further develop and support the goals of the RCC, as priorities and resources allow.</p>		<p>The Department continues to support RCC goals and participate in RCC conference calls. We are beginning to work with Region 8 to develop a regionalized/coordinated recycling effort.</p>
	<p><i>EPA will provide technical assistance on the standardization of recycling measurement methodologies.</i></p>		
	<p><i>EPA has been working with the Colorado Dept of Transportation on waste minimization projects.</i></p>		
<p>SW 6: Long Term Goal  Enhance solid waste regulatory review, and solid waste regulation and policy development through consultation with stakeholders.</p>			
<p>SW 7: Long Term Goal  Support voluntary regional waste management solutions and systems especially encouraging rural areas of the state toward regional concepts.</p>			

Solid Waste Program Goals			
SW 8: Long Term Goal Maintain interagency coordination and interaction to assure consistency and avoid duplication of regulatory impact.	Investigate areas where coordination of existing activities and programs within CDPHE and with other local, state and federal agencies can improve efficiency, streamline processes and increase customer assistance with minimal or no increase in program cost.	Participate in stakeholder processes related to NORM/TENORM, compost, recycling, landfill ban, surface impoundment guidance, material flow and management, policy, and new regulations.	The Solid Waste program is actively working with the Air Pollution Control Division, Water Quality Control Division, Colorado Oil and Gas Conservation Commission, Colorado Department of Transportation, Department of Natural Resources and the Department of Agriculture to better integrate the authorities and responsibilities of our programs and regulatory implementation strategies.
	Cooperate with OEC, DOLA, and CHFA in the implementation of HB 93-1318 so that loans, grants and studies address local and state solid waste needs and priorities.		CDPHE provided oversight at the Alps tire site for continuing cleanup of that tire pile. We are working to initiate effort to define regionalized solid waste needs and integrate regionalized material reuse where possible. The solid waste program revised the solid waste user fee collection forms to improve the accuracy and usability of the fees that support the 1288 and 182 grant program.
	<i>EPA Region 8 is working with all R8 states to advance their solid waste programs and agendas.</i>		

## Rocky Flats Program

Rocky Flats Goals & Objectives			
RF 1: Long Term Goal Assure that the site of the former Rocky Flats Plant remains in a condition that is safe and protective of public health and the environment.			
Short Term Goals	Objective	Measures	Results
RF 1.1 Implement integrated and coordinated state regulatory oversight and communication programs for Rocky Flats.	Participate in topic-specific decisions by appropriate technical and decision-making staff from involved organizations, such as DOE, EPA and local governments; topics to include surface water management, environmental monitoring, administration and reporting, etc.	Participate in ongoing consultative process among appropriate agencies as described in the Rocky Flats Legacy Management Agreement (RFLMA). Also, communicate directly with local governments and participate in the Rocky Flats Stewardship Council.	CDPHE provided oversight of monitoring and maintenance activities, particularly at the landfills, groundwater treatment systems and for terminal pond releases. CDPHE participated in all meetings and decisions as appropriate.
	The State is designated in the RFLMA as the lead regulatory agency for post-closure activities.	Provide oversight of monitoring and maintenance activities, particularly at the groundwater treatment systems and landfills.	CDPHE approves and observes maintenance activities, and inspects the landfills and ground water treatment systems frequently.
RF 1.2 Provide rigorous independent monitoring and enforcement of the Rocky Flats Site and vicinity to achieve compliance with state environmental regulations and other requirements to protect the health and environment of Colorado.	Integrate the State's environmental monitoring program with that performed by DOE's Legacy Management Program.	Completed – RFLMA Attachment 2 prescribes the Site's ongoing environmental monitoring program.	The post-closure monitoring program is included as an enforceable part of the RFLMA.
	Conduct independent surveillance of the surface water discharges.		No terminal pond releases occurred in 2008.
	Make environmental monitoring data available for scientific analysis by others.	Continue to develop, utilize, and make available a reliable Scientific Database Management System for Rocky Flats data and reports including linkage with other pertinent state and federal databases	Working with DOE, CDPHE continues to develop, utilize, and make available a reliable Scientific Database Management System for Rocky Flats data and reports including linkage with other pertinent state and federal databases.

Rocky Flats Goals & Objectives			
	Provide objective and accurate information to the public to allow credible, representative public involvement.		Responded to inquiries from the public and to comments from public comment periods.
	Enforce a post-closure agreement to maintain comprehensive and integrated environmental management systems.	Enforcement of the RFLMA is ongoing.	Enforced provisions of the RFLMA by reviewing and consulting with the Site over proposals.
	Increase public understanding and awareness of environmental issues at Rocky Flats.	Communicate program activities to local governments, other agencies, and the public.	Met with local government representatives in technical briefings and in Stewardship Council meetings.
		Participate in public forums.	Participated in public forums such as Rocky Flats Stewardship Council meetings.
	<i>EPA will provide a CERCLA determination for periodic (5-year) reviews and any future NPL delistings.</i>	<i>Integrate Federal, State and local requirements in a manner that does not result in duplicative oversight.</i>	The next CERCLA 5-Year Review report, due in 2012, will be cooperatively written by the 3 parties to RFLMA.

## Voluntary Clean-up and Re-development Program

**Mission:** Our goal is to respond to the owners of as many sites as possible to facilitate redevelopment and transfer of contaminated properties, while assuring that adequate cleanup is performed for the proposed land use.

<b>Voluntary Clean-Up and Re-Development Program</b>			
VC 1: Long Term Goal Respond to the owners of as many sites as possible to facilitate redevelopment and transfer of contaminated properties, while assuring that adequate cleanup is performed for the proposed land use.			
<b>Short Term Goals</b>	<b>Objective</b>	<b>Measures</b>	<b>Results</b>
VC 1.1 The program will efficiently review cleanup applications and insure that all approvals are protective of human health and environment.	Process 50 applications per year.	Number of applications processed.	CDPHE reviewed 62 applications in FFY 2008. This is slightly above the average application rate of between 40-50 per year .
VC 1.2 Implement MOA with EPA to enhance communication about sites and to provide assurances to the applicant via the MOA	Ensure that each site requiring coordination under the MOA, receives such coordination.		CDPHE continues to coordinate with EPA as required under the MOA.  In FFY 2009 CDPHE also executed an MOU with the City and County of Denver to share information on suites with Institutional Controls in an effort to monitor compliance with use restrictions.

## Radon Intervention Grant

**Mission:** The Radon Intervention Grant is used to develop effective, efficient activities for the state with emphasis on raising awareness of radon issues, increasing testing rates and encouraging mitigation in response to elevated radon levels. Homeowners, local governments, realtors and builders will continue to be target groups for communicating about radon testing and radon-resistant new construction. Distribution of funding to local health departments, cooperative extension offices and other entities at the local level will ensure coverage throughout Colorado. Annual surveys will be conducted on measurement results, mitigation providers, builders and schools as requested by the EPA Radon Reinvigoration Strategy.

Radon Intervention Grant Goals				
RA 1: Long-term goal Increase radon awareness. Assure that Colorado homes continue to be tested for radon, with intervention to reduce radon risk if a test result calls for action.				
Short-term goal	Objectives	Performance measures	Milestones	Results
RA 1.1 Increase awareness, testing and mitigation of homes with elevated radon levels. Work toward adoption of more radon-resistant building codes.	Contract through the grant for products and services that improve radon awareness, testing, and mitigation in Colorado.	Number and/or percent of homes that have been mitigated for elevated radon levels.	Number of homes that have been mitigated for radon.	8,597 homes were mitigated in Colorado in 2007. This is 764 more homes than in 2006.
	Provide current information to homeowners, real estate agents, buyers, sellers, and builders about radon testing and mitigation.	Percentage of homes tested for radon.	Number of homes that have been tested for radon.	18,807 homes were tested for radon in 2007. This is 3,918 more homes than in 2006.
RA 1.2 Strengthen radon public health activities in Colorado's zone 1 (high radon potential) counties.	Work with volunteer municipalities and counties to adopt construction standards to reduce radon in residential, school, and public buildings.	Number of homes in each county that have been built using radon-resistant features.	Number of homes built with RRNC	In 2007, Ft. Collins, Colorado was the first city in Colorado to pass a RRNC requirement for new multi-family home construction. Colorado also has 3 counties and 2 cities that require RRNC. It is estimated that 300 homes were built with RRNC in 2007.

Radon Intervention Grant Goals				
	<p><i>EPA: EPA will offer assistance in public outreach efforts, help coordinate activities of the state and the Western Regional Radon Training Center, provide support for the contracts with counties and partners that have been established and offer manpower at events.</i></p>			
	<p><i>EPA: EPA will also forward relevant information from HQ or other entities to the state. Guidance will be provided as needed on the information.</i></p>			
	<p><i>EPA: EPA will also provide support to the state in the creation of radon-related policy statements or programs such as the radon proficiency program.</i></p>			
	<p><i>EPA: EPA will review annual reports submitted by the state and offer a response that assures that the work plan agreed to is being followed and goals are being met.</i></p>			