



MONTANA DEPARTMENT OF
ENVIRONMENTAL QUALITY

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY



COOPERATIVE AGREEMENT
October 1996 - June 1997



Approved:

The undersigned hereby execute this cooperative agreement between the Montana Department of Environmental Quality and the Environmental Protection Agency for the period October 1996 - June 1997.

Mark A. Simonich
Mark A. Simonich, Director
Department of Environmental
Quality

11/25/96
Date

Jack W. McGraw
Jack W. McGraw
Acting Regional Administrator

DEC 19 1996
Date

John F. Wardell
John F. Wardell, Director
Montana Office

11/19/96
Date

U.S.EPA REGION 8
Technical Library 80C-L
999 18th Street, Suite 500
Denver, CO 80202

TABLE OF CONTENTS	<u>Page</u>
Introduction.....	1
Performance Partnership Grant.....	1
Core Programs.....	2
Implementation of Goals and Measures.....	3
Quality Assurance Program.....	3
Reporting.....	3
Community Based Environmental Protection.....	3
Environmental Justice.....	4
Pollution Prevention.....	4
Future Cooperative Agreements.....	4
Enforcement Agreement.....	4
Enforcement and Compliance Assurance Sector Initiative...	5
Program Description and Workplans	
Monitoring, Assessment and Planning Program.....	12
Technical Studies and Support Program.....	23
Wastewater Discharge Permit Program.....	31
Ground Water Program.....	38
Public Water Supply Program.....	45
Municipal Wastewater Assistance Program.....	69
Air Program.....	87
Hazardous Waste Program.....	110
Underground Storage Tank Program.....	129
Leaking Underground Storage Tank Program.....	132

INTRODUCTION

The previous fiscal year has been a transition year for both the Montana Department of Environmental Quality (DEQ) and the Environmental Protection Agency. Beginning in October 1995, EPA underwent a major reorganization that resulted in new administrative divisions based upon functional programs rather than the traditional media programs. In July 1995, DEQ was created through the combining of the former environmental programs of the Department of Health and Environmental Sciences (DHES) and certain programs from the Department of State Lands and the Department of Natural Resources and Conservation. Personnel from the three agencies made physical changes and were combined into two buildings during the early spring of 1996. New administrative divisions based upon functional programs became effective in July 1996. The functional divisions are completing their internal reorganizations.

As a result of these reorganizations of both EPA and DEQ and in order to form a better partnership among the two agencies, this cooperative agreement will be a transitional one. Because it is still too early in DEQ's functional reorganization to do anything else meaningful, the cooperative agreement is still based upon media activities rather than upon the various division's functional activities. The cooperative agreement is for a 9 month period (October 1996 - June 1997) rather than for the traditional 12 month federal fiscal year. Future cooperative agreements will be based upon the state fiscal year and will be for the 12 month period beginning July 1 and ending the following June 30.

Beginning this year, grants for a number of the traditional media programs have been combined into one single performance partnership grant. The current status and future plans for this grant will be discussed in a separate section.

The goal of Montana's environmental protection programs is to protect public health while sustaining a spirit of cooperation between environmental protection and resource development. Through agreements, research, monitoring, technical expertise and other areas of cooperation, the DEQ and EPA are helping Montanans maintain a high quality lifestyle. The cooperative agreement contributes to this process by consolidating all narratives and work plans, thus producing a concise document and reducing paperwork and duplication of effort.

PERFORMANCE PARTNERSHIP GRANT

Language in EPA's 1996 budget authorized the combining of certain grants to States into one grant. Beginning in October 1996, Clean Water Act 106 grants for both surface and ground water, the Public Water Supply Supervision grant, the Underground

Storage Tank Program grant, the Hazardous Waste Program grant, the Clean Air Act 105 grant and the radon program grant have all been combined into one performance partnership grant (PPG). Future grants to be added during the course of the cooperative agreement, as they become available to Region VIII to award to DEQ, include Clean Water Act Section 319 non-point source grants and Clean Water Act Section 104(b)(3) grants for wetlands, MPDES activities and total maximum daily load development. Because of the transition to the state fiscal year period, the performance partnership grants being awarded are, for the most part, for three-fourths of the available grant. The remaining one-fourth of the grant will be awarded during the period of the next cooperative agreement.

Any grant additions to the PPG will require the submittal of additional workplans to account for the activities that are being funded by the grant addition. This includes the use of carryover money from the previous fiscal year.

During this cooperative agreement period, DEQ has not requested the use of any flexibility in the PPG process that would allow the Department to move funds between media categories. It is planned to negotiate this flexibility in future PPA's.

DEQ and EPA will jointly evaluate the success of the Performance Partnership Grant, to the extent it is being utilized, using the following measures. Does the PPG allow DEQ to:

- o improve environmental performance
- o achieve administrative savings; and
- o strengthen the partnership between DEQ and EPA.

The evaluation will occur at mid-year and end-of-year.

CORE PROGRAMS

DEQ certifies that it has, maintains, and implements adequate programs in conformance with federal and state laws and regulations and conditions set forth in program authorization/delegation documents for the programs contained in this cooperative agreement. The cooperative agreement is not intended to and does not supersede authorization/delegation documents or enforcement agreements.

IMPLEMENTATION OF GOALS AND MEASURES

By entering into this cooperative agreement, DEQ and EPA, agree to implementation of the goals and measures contained herein. EPA commits to fund DEQ in the amounts specified in the Performance Partnership Grant application. Should final appropriations be considerably less than these amounts, both parties may renegotiate the goals and measures outlined in this agreement.

QUALITY ASSURANCE PROGRAM

DEQ will maintain an EPA approved Quality Assurance Program that meets or exceeds federal requirements which cover any data collection activities for which DEQ receives financial assistance. DEQ will also continue to provide input into regional/national data bases.

REPORTING

Except where otherwise specified differently in the program workplans, DEQ will provide midyear and end-of-year performance reports for each program workplan. The midyear report will be an exceptions type report in that the report will only identify areas that are not meeting the expectations of the workplans. It may be used to negotiate modifications, if needed, to the workplans. The end-of-year performance report will address both accomplishments and shortcomings.

Financial reporting by DEQ will be done in accordance with 40 CFR 31.41.

COMMUNITY BASED ENVIRONMENTAL PROTECTION

Community based environmental protection is an approach to delivering environmental programs that emphasizes environmental goals and outcomes, relies upon a collaborative and inclusive process for developing environmental solutions and seeks to consider all environmental concerns comprehensively within an identified geographic area.

DEQ and EPA both recognize that community based, cross media approaches to addressing environmental issues can be effective and provide for a comprehensive, localized, tailored approach to resolving those issues. During the period of this cooperative agreement, EPA and DEQ will continue to work together in addressing the on-going activities in the Clark Fork and Flathead watersheds. Community based environmental protection activities in other watersheds will be identified, and DEQ and EPA will work together to identify mutual roles in those activities as well as future needs in watersheds without any on-going activities.

EPA will provide community based environmental protection related training as needed and requested by DEQ or other entities in Montana, as well as technical, project development or financial assistance for community based environmental protection activities as resources allow.

ENVIRONMENTAL JUSTICE

With the issuance of Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations" in February 1994, environmental justice became a priority for EPA. A national work plan for environmental justice has been developed and Region VIII has made commitments to fulfill various elements of the national work plan in regional work plans.

During the period of this cooperative agreement, DEQ and EPA will begin discussions to discuss the environmental justice strategy, its applicability to Montana, and the appropriate roles of both DEQ and EPA. EPA commits to provide support and technical assistance to DEQ in the form of training, consultation and collaboration on identified environmental justice projects.

POLLUTION PREVENTION

DEQ recently created a pollution prevention bureau to coordinate pollution prevention activities, both within the Agency and with other agencies. During the period of this cooperative agreement, DEQ will continue to maintain these activities and will seek out new opportunities for additional pollution prevention activities. EPA will provide financial and technical assistance to DEQ for the current and future activities, to the extent that resources allow.

FUTURE COOPERATIVE AGREEMENTS

DEQ will form a "study team" to develop the process for moving DEQ gradually over a period of time into a performance partnership agreement. The study team will consist, at a minimum, of at least one person from each division including the Fiscal Division, a person from the Director's office, a person from the Planning Division and a person from EPA.

ENFORCEMENT AGREEMENT

DEQ and EPA will work together towards developing a comprehensive enforcement agreement for all programs that will replace the individual enforcement agreements from past SEAs.

SECTOR ENFORCEMENT AND COMPLIANCE INITIATIVE

EPA has identified six industrial/commercial sectors for implementation of an enforcement and compliance assurance initiative. DEQ will participate with EPA in this initiative.

The intent of addressing these sectors is to define baseline sector compliance and increase sector compliance through special emphasis and focused application of the appropriate compliance and enforcement tools.

EPA intends to comprehensively evaluate the compliance issues, compliance needs and compliance rate of these sectors in Region VIII. ("Comprehensive Evaluation" is defined in *EPA's Enforcement and Compliance Assurance Work Plan for the State of Montana*, which has been provided to DEQ.)

The purpose of the evaluations is to: (1) define the compliance status and compliance problems associated with the selected facilities and operations within these sectors; and (2) develop, implement and evaluate approaches which may be able to increase the compliance rate within these sectors.

It is the intent of both the State and EPA to define the specific facilities and media of interest for each sector as quickly as possible. Compliance inspections conducted during either Federal FY 96 or FY 97 may be relied upon to provide the information necessary for the comprehensive evaluations, provided that the inspections assessed all aspects of the facility's or source's compliance requirements. It should be noted that much of the inspection work for this initiative may have either already been done in FY 96, or already be planned for FY 97. For example, DEQ's hazardous waste program already focuses on dry cleaners as solvent users which are inspected as part of its solvent registration program; the hazardous waste, air, and MPDES programs normally inspect all refineries and power plants each year; and auto service facilities are part of the universe of facilities normally inspected by the UST program.

For this sector initiative, the Montana Department of Agriculture (MDA) and DEQ will conduct the media inspections for which they have delegated programs, and EPA will conduct those for non-delegated media programs and those inspections which may be conducted in Indian Country. EPA, MDA and DEQ recognize that there will be a need to coordinate the inspections among themselves. (Should the Montana Oil and Gas Board be delegated the UIC Class II program during FY 97, coordination with the Board may also be necessary).

The media programs which retain an interest in these sectors are noted in the *Table of Media Sector Participation* - those which will participate will have an entry in the appropriate row for the sector of interest.

Agricultural Practices Sector:

Based on criteria contained in *EPA's Enforcement and Compliance Assurance Work Plan for the State of Montana* and information in EPA's files, EPA will select an ag pesticide producer in

Montana as a candidate for a comprehensive evaluation. Using these same criteria applied to information in DEQ files, DEQ (in coordination with MDA) will select one fertilizer producer or one feedlot operation for the same evaluation. These criteria include size, geographic clustering, environmental justice concerns, compliance history, and others.

EPA will provide to DEQ and MDA an itemized list of information (such as current and historical non-compliance, environmental justice and community concerns, environmental problems at the site, pollution prevention potential) needed from State files for these facilities in order to conduct the comprehensive evaluations, including parameters regarding what is considered current and relevant information. DEQ and MDA will use this list to extract information from their files. If inspections of these facilities have not been done during FY 96, DEQ, MDA, and EPA will inspect these facilities to gather the needed information.

Auto Services Sector:

EPA and DEQ will collaborate in selecting a list of representative facilities from the universe of this sector for comprehensive evaluation (one percent of the universe = 34 facilities). The list of facilities will be selected based on information obtained from Dun and Bradstreet, FINDS and RCRIS databases, and other sources. EPA and DEQ will select facilities which were inspected by DEQ during FY 96 to the maximum extent possible, provided that the facilities so selected are representative of the sector. Because the universe is so large, and includes many forms of vehicle service, the inspections/evaluations will focus on those service facility types using Standard industrial Codes (SIC) that have the greatest potential for environmental impact: new and used car dealers with service (SIC 5511 and 5521), paint and body shops (SIC 7532), general automotive repair (SIC 7538), public transportation maintenance facilities (if any), and government motor pool facilities.

EPA will provide DEQ an itemized list of information (such as current and historical non-compliance, environmental justice and community concerns, environmental problems at the site, pollution prevention potential) needed from State files for these facilities in order to conduct the comprehensive evaluations, including parameters regarding what is considered current and relevant information. DEQ will use the lists to extract information from its files, and to conduct inspections during FY 97 where selected facilities have not been inspected during FY 96.

Dry Cleaner Sector:

(NOTE: In the Dry Cleaner sector, outreach will be done first, followed by compliance audits/inspections and comprehensive evaluations second. This is opposite the order for the other five sectors.)

EPA and DEQ will determine the level and type of outreach and other small business compliance assistance activities which are currently available to the dry cleaner industry. This may include outreach conducted by DEQ and other state or federal agencies. If additional activities are necessary to adequately inform the dry cleaner industry of the environmental requirements which apply to them, EPA and DEQ will collaborate in the design and implementation of those additional activities, and will carry them out.

After outreach activities are complete, EPA and DEQ will collaborate on the selection of dry cleaners for a comprehensive evaluation. A representative list of 15 facilities (approximately 10% of the universe in MT) will be randomly selected. The list will include to the extent possible those dry cleaners already visited during FY 96, provided no criteria were used to select the FY 96 dry cleaners which would adversely bias the random nature of this sector initiative. EPA will provide DEQ with a list of information (such as current and historical non-compliance, environmental justice and community concerns, environmental problems at the site, pollution prevention potential) necessary to conduct a comprehensive evaluation and determine compliance status. For small businesses (100 or fewer employees company-wide), the visits will be compliance assistance audits. For large businesses, the visits will be compliance inspections. The compliance audits will be followed by a letter describing the non-compliance, with assistance in returning to compliance. Violations at large businesses will be followed with whatever action is called for in the applicable Enforcement Agreement. From this information, EPA will determine the compliance status of this sector.

Petroleum Refining, Coal Fired Power Plant, and Primary Non-Ferrous Metals and Mining Sectors:

EPA will provide to DEQ (1) the list of facilities for each sector, and (2) an itemized list of information (such as current and historical non-compliance, environmental justice and community concerns, environmental problems at the site, pollution prevention potential) needed from State files for these facilities in order to conduct the comprehensive evaluations, including parameters regarding what is considered current and relevant information. The list of facilities will be selected based on information obtained from EPA files, databases, and other sources. DEQ will use these lists to extract information from its files, and to conduct inspections where necessary to obtain the information.

Post-Inspection/Evaluation Activities

(NOTE: In the Dry Cleaner sector, outreach will be done first, followed by compliance audits and comprehensive evaluations second. This is opposite the order for the other five sectors.)

Reports will be written for all inspections. If violations are found during any inspections conducted, EPA and DEQ will adhere to the provisions of the cooperative enforcement agreements for follow up.

EPA and DEQ will share the results of all media inspections. EPA will define the compliance status of these sectors using the information collected as a result of these inspections and file reviews, and any other valid data available to it. EPA will attempt to identify compliance strategies and outreach activities that will improve compliance within each sector. By utilizing information collected from sectors across the Region, patterns of non-compliance and successful compliance activities may emerge.

EPA and DEQ agree to collaborate in the design and implementation of compliance strategies and outreach approaches to these sectors in order to improve future compliance. EPA and DEQ will utilize existing outreach and compliance assistance mechanisms to the maximum extent

possible. EPA and DEQ will evaluate the effectiveness of these approaches through continued compliance monitoring activity in future fiscal years. Additionally, EPA and DEQ will provide compliance assistance as necessary to support these approaches.

For Fiscal Year 1997

The following *Table of Milestones for the FY 97 Sector Enforcement and Compliance Initiative* details the schedule under which these sector activities will be completed.

Table of Milestones for the FY 97 Sector Enforcement and Compliance Initiative

Activity	Completion Date	Responsible Agency	Comment
AG PRACTICES SECTOR			
AUTO SERVICES SECTOR			
PETROLEUM REFINING SECTOR			
COAL-FIRED POWER PLANT SECTOR			
PRIMARY NON-FERROUS METALS AND MINING SECTOR			
1. Finalize lists of facilities and sources.	11/30/96	EPA, MDA, DEQ	
2. Provide list of file information needed for candidates selected in step 1 to DEQ and MDA.	12/30/96	EPA	
3. Provide file information on candidates to EPA.	2/30/97	DEQ, MDA	
4. Conduct inspections and prepare reports.	6/30/97	DEQ, MDA, EPA	
5. Perform comprehensive evaluations, and establish compliance status.	7/30/97	EPA	
6. Design compliance outreach approach.	8/30/97	EPA, DEQ, MDA	
7. Implement compliance outreach approach.	9/30/97	EPA, DEQ, MDA	

Activity	Completion Date	Responsible Agency	Comment
DRY CLEANING SECTOR			
1. Determine sufficiency of current outreach and compliance assistance activities.	12/30/96	EPA, DEQ	
2. If necessary, design additional outreach and assistance activities.	1/30/97	EPA, DEQ	
3. If necessary, implement additional outreach and assistance activities.	3/30/97	DEQ, EPA	
4. Finalize list of candidate dry cleaners to be audited/inspected.	12/30/96	DEQ, EPA	
5. Provide list of information needed to evaluate sector compliance status.	1/30/97	EPA	
6. Conduct inspections/audits, and prepare reports.	8/30/97	EPA, DEQ	
7. Determine sector compliance status.	9/30/97	EPA, DEQ	

Table of Media Sector Participation *

Sector (delegation status)	CAA (1)	CERCLA (2)	EPCRA (2)	FIFRA (3)	NPDES (4)	OPA (2)	PWSS (4)	RCRA (5)	TSCA (2)	UIC (2)	UST (5)	404 (2)	Asbestos AHERA (2)	Asbestos NESHAPS (5)
Agriculture			x	x	x			x		x				
Auto Service	x							x		x	x			
Dry Cleaner	x							x	x	x	x			
Petroleum Refining	x		x		x	x		x		x	x			
Coal-Fired Power Plants	x				x			x	x	x	x			
Primary Non- Ferrous Metals and Mining	x	x			x			x	x	x	x			

* "x" indicates an active interest by the media program noted. Other media programs are "on call" should the need for their involvement arise. Active interest does not necessarily mean that a site visit by that media program is a certainty for all sites within the sector; there may be no reason to visit a particular site within the sector, or the need for a site visit may be satisfied by the presence of a multi-media inspector.

Delegation status codes:

- 1 - Partially delegated to DEQ (CFC and some MACT standards are not delegated to DEQ).
- 2 - Not delegated
- 3 - Delegated to MDA
- 4 - Partially delegated to DEQ (sludge and pre-treatment standards are not delegated to DEQ).
- 5 - Delegated to DEQ

MONITORING, ASSESSMENT AND PLANNING

FISCAL YEAR 1997 PROGRAM PLAN

Fiscal Year 1997 will be a year of transition for the Monitoring, Assessment and Planning (MAP) Program as the new DEQ completes its organizational efforts. DEQ is organizing along functional lines and former MAP program elements will be separated into two or more new bureaus within the new Planning, Prevention and Assistance Division. It is anticipated that monitoring and assessment functions will fall within the new Monitoring and Data Management Bureau, while watershed planning responsibilities will go to the new Resource Protection Planning Bureau.

Again in FY 1997, former MAP program staff will address lakes, streams and wetlands. Highlights include a continuation of statewide lakes monitoring by volunteer monitors, implementation of a voluntary nutrient TMDL plan for the Clark Fork River, continued implementation of the tri-state Clark Fork-Pend Oreille Basin management plan, completing a wetlands assessment/biocriteria development project, and continued development of TMDLs for Flathead Lake, Swan Lake and Ten Mile Creek.

DEQ will initiate a thorough review and continue to fund, as deemed appropriate, monitoring of Flathead Lake and tributaries by the University of Montana's Biological Station as part of the Flathead Basin Commission's master plan for monitoring surface water quality in the Flathead Basin. Using carryover funds from the statewide lake water quality assessment grant, the Department will again contract with the Canyon Ferry Limnological Institute to provide training and equipment for lake monitoring to citizen volunteers. The volunteer monitoring project of the Flathead Basin Commission will continue as a component of the Flathead TMDL project. A special lakes nonpoint source education project will be initiated in FY 1997.

Ambient monitoring of the Clark Fork River will continue at 26 sites, to the degree that staff resources allow. Nutrients and other parameters will be sampled quarterly. Through a continuing cooperative funding agreement with ARCO, macroinvertebrates and periphyton will be collected once in August and interpretive reports prepared. A tri-state Clark Fork-Pend Oreille Basin water quality monitoring strategy focusing on nutrients will be completed and joint funding discussions begun with business, industry, and local, state and tribal governments. A special study of nonpoint source pollution problems, sources and geographic trends will be initiated in the Bitterroot River drainage and a monitoring plan developed. Stream reach assessments or intensive surveys will be conducted by program staff on approximately 25 threatened or impaired streams statewide. Approximately 10 lakes and wetlands will be sampled for chemical and biological variables. All new water quality information will be used to update assessments in the EPA Waterbody System.

DEQ will continue its contract with the Natural Resource Information System of the Montana State Library to index stream segments in Reach File 3 in order to develop ArcInfo coverage of state waters. The Department will complete and distribute the 1996 Montana 305(b) report. The 1996 305(b) report will include a refined 303(d) list of water quality-limited waterbodies. Statewide public meetings will be held to discuss the 303(d) list and its implications.

A contract coordinator will continue to facilitate implementation of the Clark Fork River-Lake Pend Oreille nutrient management plan. In addition, program staff will participate in planning efforts underway in the Upper Clark Fork River (SB 434), and in the Blackfoot and Kootenai river basins (Blackfoot Challenge and the Kootenai River Network). DEQ will complete an interpretive report on recommendations for voluntary clean-up of abandoned mine sites in the Blackfoot watershed and assist in implementing remedial projects.

Development of biological water quality criteria will continue in FY 1997. Reference streams will be revisited to establish annual variability in biological metrics. The DEQ biological data bases will be updated as needed. A statewide wetlands assessment report will be published and distributed, together with recommendations for adopting statewide wetlands biocriteria.

Lastly, DEQ staff will work with stakeholders to pursue development of a strategy including possible sponsorship of legislation for statewide implementation of the TMDL process.

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL #1: Administer the MAP Program							
OBJECTIVE #1: Administer Current-Level Program Activities: 1. Plan, organize, coordinate and lead program activities; develop, defend and track budgets; prepare and monitor contracts; and perform other administrative functions as needed. 2. Fill, train and supervise program positions; assign duties and monitor and evaluate staff performance. 3. Monitor changes in federal and state law, rules and policy affecting program and personnel. 4. Attend weekly managers meetings and monthly section meetings.	Ongoing	Bahls (vacant) Ingman	0.50	0		RIT	A
SUBTOTALS			0.50	0		RIT	

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL #2: Monitor Water Quality and Assess Sources and Causes of Pollution							
OBJECTIVE #1: Implement Clean Lakes Program Activities: 1. Monitor Flathead Lake and tributaries (7 stations 15 times per year) per agreement with the Flathead Lake Biological Station, University of Montana (FLBS). 2. Continue lake volunteer monitoring project per agreements with the Flathead Basin Commission and the Canyon Ferry Limnological Institute; assist with training of volunteers. 3. Assist the Flathead Basin Commission with the Flathead Lake TMDL project. 4. Serve on Flathead Basin Commission and FBC Monitoring and Lake Management Committees; administer Clean Lakes program contracts; pursue additional support and funding for the Clean Lakes Program in Montana. 5. Initiate lakes nonpoint source education program.	Ongoing	Apfelbeck Bahls (vacant) Levine	0.60	50,000		RIT 20,000 314 30,000 106	A
OBJECTIVE #2: Complete Wetlands Assessment and Biocriteria Project Activities: 1. Develop wetlands biocriteria and complete final report.	06/97	Apfelbeck	0.30			RIT	A

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE #3: Conduct Intensive Waterbody Surveys Activities: 1. Prioritize intensive surveys on page 4 of the Montana Water Quality Monitoring Strategy (04/28/94) according to the criteria listed on page 2 of the Strategy. 2. Design and conduct intensive surveys in order of priority, as staff and resources allow. 3. Prepare a report on each intensive survey in a timely manner.	Ongoing	Apfelbeck Levine Ingman	0.80			RIT 604b	A
OBJECTIVE #4: Conduct Clark Fork Monitoring Activities: 1. Conduct quarterly chemical/physical monitoring at 26 stations. 2. Conduct annual biological monitoring at 25 stations. 3. Manage project budget, contracts, and MOUs. 4. Participate in meetings of the monitoring subcommittee of the Clark Fork Coordinating Forum. 5. Prepare or coordinate the preparation of Clark Fork River water quality reports. 6. Negotiate joint funding agreement with business, industry and local and state government.	Ongoing	Ingman	0.10	48,000		RIT 37,000 ARCO 20,000 Fees	A
SUBTOTALS			1.80	98,000		RIT 604b 20,000 314 30,000 106 37,000 ARCO 20,000 Fees	

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL #3: Prepare and Implement Water Quality Management Plans							
OBJECTIVE #1: Prepare and Implement Statewide Plan for Basin Management and Ambient Water Quality Monitoring Activities: 1. Design and implement a monitoring network for the purpose of writing discharge permits and tracking the performance of permitted discharges, and for collecting baseline information for nondegradation reviews. 2. Participate in development of national nutrient assessment strategy for rivers and streams with states and EPA HQ. 3. Work with Project WET, NRIS and NPS Program staff to develop and fund a statewide citizen volunteer water quality monitoring project. 4. Secure assistance from The Cadmus Group for integrating SRF and NPS program planning under a statewide basin management approach.	06/97	Bahls (vacant) Ingman Levine	0.30	10,000		RIT 604b 50,000 Fees	A

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE #2: Implement Section 525 Nutrient Management Plan for the Clark Fork River Basin Activities: 1. Serve on project steering committee. 2. Administer grant for and provide guidance to project coordinator. 3. Participate in Tri-State Council meetings; chair and participate in subcommittee meetings. 4. Coordinate implementation of Clark Fork nutrient TMDL. 5. Coordinate implementation of project to land-apply Deer Lodge wastewater. 6. Work with NPS staff, NPS subcommittee, SB434 committee, and others to develop a NPS pollution control strategy for the basin. 7. Continue to work with Butte-Silver Bow, Superfund, ARCO and others to explore alternatives to Butte's direct wastewater discharge to Silver Bow Creek.	Ongoing	Ingman	0.20	35,000		RIT 35,000 104b	A
OBJECTIVE #3: Implement Upper Clark Fork River Basin (SB 434) Management Plan Activities: 1. Participate in meetings of the Steering Committee and Watershed Subcommittee. 2. Develop recommendations and legislation for 1997 legislature.	Ongoing	Ingman	0.10	0		RIT	A

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE #4: Participate in Watershed Planning in the Blackfoot, Bitterroot and Kootenai Basins Activities: 1. Participate in quarterly meetings of the Kootenai River Network. 2. Assist in finalizing the Kootenai River Network workplan and implementing the plan's recommendations. 3. Administer grants for Kootenai River Network facilitator and Network activities. 4. Participate in meetings and activities of the Blackfoot Challenge and its subcommittees. 5. Conduct Bitterroot watershed NPS pollution assessment and develop long-term monitoring strategy.	Ongoing	Ingman	0.10	33,000		RIT 58,000 104b	A
OBJECTIVE #5: Participate in Other Planning Activities as Needed	Ongoing	Ingman Levine	0.20	0		RIT	A
SUBTOTALS			0.90	78,000		RIT 604b 50,000 Fees 93,000 104b	

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL #4: Provide Water Quality Information and Other Assistance to Resource Managers and the Public.							
OBJECTIVE #1: Edit, Print and Distribute 1996 305(b) Report and 1996 303(d) List	December 1996	Contractors Levine Williams	0.10	10,000		RIT 604b	A
OBJECTIVE #2: Maintain DHES/EPA Waterbody System Activities: 1. Assemble and evaluate new water quality information as it becomes available. 2. Prepare or update waterbody assessments as necessary. 3. Enter waterbody assessments into the DHES/EPA Waterbody System. 4. Administer contract with Montana State Library for reach file indexing and ArcInfo coverage of state waters.	Ongoing	Levine	0.30	50,000		604b 50,000 104b	A
OBJECTIVE #3: Provide Water Quality Information, Technical Assistance and Expert Witness Testimony as Needed Activities: 1. Provide copies of the latest 305(b) report, 303(d) list, waterbody assessments, water quality data, and other information, to resource managers and the public. 2. Provide technical assistance and general consultation services to resource managers and the public. 3. Help teachers and citizens to design and implement volunteer water quality monitoring projects. 4. Provide expert witness testimony as requested for local water quality districts and the state's natural resource damage claim against ARCO.	Ongoing	Staff Williams	0.60	0		RIT 604b	A

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE #4: Develop Biological Water Quality Criteria Activities: 1. Resample reference streams to establish annual variation in biological metrics. 2. Refine bioassessment techniques and biological criteria. 3. Develop periphyton biocriteria and bioassessment protocols.	Ongoing	Bahls (vacant)	0.10	10,000		RIT	A
OBJECTIVE #5: Provide QA/QC Services Activities: 1. Develop Quality Assurance Program Plans as needed. 2. Finalize updated and expanded Field Procedures Manual. 3. Provide other QA/QC assistance as needed. 4. Provide training on QA/QC.	Ongoing	Apfelbeck	0.10	0		604b	A
OBJECTIVE #6: Coordinate TMDL Activities Activities: 1. Coordinate TMDL development for the Upper Clark Fork River, Flathead Lake, Swan Lake and Ten Mile Creek. 2. Provide assistance to other programs (e.g., mining compliance) for future TMDL development. 3. Participate in a work group to develop a strategy for completion of necessary TMDLs in a timely manner, including legislation and rules for statewide TMDL process. 4. Conduct statewide meetings to discuss the draft 303(d) list.	Ongoing	Bahls (vacant) Levine Ingman	0.60	30,000		30,000 104b	A
SUBTOTALS			1.80	100,000		RIT 604b 50,000 104b	

Planning Matrix

Program Monitoring, Assessment and Planning Fiscal Year 1997 By Gary Ingman

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
TOTALS			5.00			RIT 604b 314 104b 106 Fees ARCO	

TECHNICAL STUDIES AND SUPPORT SECTION (SURFACE WATER 106)

The mission of the Technical Studies and Support Section is to protect, sustain, and improve the quality of State Waters to benefit present and future generations.

This section provides scientific support to the Planning, Prevention and Assistance Division (PPAD) in the area of standards development and interpretation, including the development of permit limits, provides technical support for computer and data management systems for all division sections, and provides technical support for reviewing and tracking developments (such as mining) which may effect surface or ground water quality whether or not the development activity requires a permit from the DEQ.

The section also provides scientific analysis concerning toxicity, permit limits, standards interpretations, determination of nondegradation standards, and the implementation of nondegradation standards.

The State surface water quality standards and the nondegradation rules must be reviewed and revised at intervals not to exceed three years. In fact, the review and revision process requires a constant level of effort with concentrated effort every three years. The nondegradation rules were completely revised in 1994 and are increasingly being utilized as public awareness grows. Legislative changes to the Montana Water Quality Act have necessitated continued changes to the rules.

At the present time hard-rock mines are the most visible and contentious developments which could potentially degrade water quality throughout the State of Montana. The Technical Studies and Support Section is responsible for ensuring these hard-rock mining activities are in compliance with the water quality standards of Montana. The section reviews all mining plans submitted for potential violations of the water quality standards. Follow-up includes inspections and monitoring, after construction, to ensure compliance with nondegradation requirements surface and ground water quality standards. In the past these developments were not processed in a timely manner and there was virtually no follow up in terms of monitoring and review. Modifications in organization or changes in staff/section responsibilities are needed to adequately preform this function.

Additionally, through the Montana Environmental Policy Act (MEPA) process, all other significant developments, such as subdivisions or shopping malls, which may affect water quality, are reviewed by section personnel for potential impacts and compliance requirements.

The Section contributes one FTE for general personal computer (PC) hardware and software support to the staff of the PPAD. These support functions include:

- Provide data-base program(s) integration, development, and support for all Sections of the PPAD which will ensure that the Division is able to meet all present and future needs for data storage, manipulation, retrieval, and utilization;

- Research concerning computer system hardware and software changes, modifications, and upgrades needed to accommodate future needs and developments required by Section, Department, State and Federal legislation and programs;
- Development, implementation, and planning activities for the PPAD computer system;
- Computer system inventory control methods which meet all Division, Department and Federal requirements;
- Conduct maintenance, repair, troubleshooting, and upgrading of the PPAD's computer system hardware and software;
- Provide computer system expertise to the Division staff;
- Provide computer system interface-support with Federal computer systems;
- Provide support for PPAD access and utilization of data manipulation including uploading and downloading for the EPA data bases including FRDS, STORET, IRIS and others.

Planning Matrix

Technical Studies and Support/EPA-106

Fiscal Year 1997

By: Abe Horpestad

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$¹	FUNDING SOURCE²	
OBJECTIVE #1: ADMINISTER THE TECHNICAL STUDIES AND SUPPORT GROUP.							
Activities required for the accomplishment of Objective #1:							
A. Plan section activities, develop budgets, and write reports;	Ongoing	Bureau Chief Admin Support	0.20				A
B. Assign duties, supervise, and evaluate staff;	Ongoing	Bureau Chief	0.06				A
C. Conduct research, prepare and submit requests for EPA grants related to computer systems; submission of Section budget amendments;	Ongoing	Abe H	0.02				A
	Ongoing	Alan H	0.01				A
	Ongoing	Don M	0.02				A
D. Conduct research, prepare and submit special computer system projects concerning outside vendors;	Ongoing	Don M	0.16				A
E. Inter-agency/Department contract development, Development of external, private vendor contracts, Supervision of vendor contracts;	Ongoing	Abe H	0.02				A
	Ongoing	Don M	0.25				A
	Ongoing	Contracts					A
SUBTOTAL FOR OBJECTIVE #1:			0.740		45,478		
CONTRACTS FOR OBJECTIVE #1:							

¹ COST PER TASK CAN BE CALCULATED BY MULTIPLYING FTE TIMES THE AVERAGE COST PER EMPLOYEE OF 54,493 (84% EPA-106, AND 16% NON-FEDERAL)

² 86% EPA-106, AND 14% NON-FEDERAL

Planning Matrix

Technical Studies and Support/EPA-106

Fiscal Year 1997

By: Abe Horpestad

OBJECTIVE #2: DETERMINE THE EFFECTS OF ONGOING MINING ACTIVITIES AND PROVIDE INPUT TO THE PERMIT DIVISION ON THE WATER QUALITY EFFECTS OF PROPOSED MINING ACTIVITIES.

Activities required for the accomplishment of Objective #2:

A. Coordinate review and oversight of hard rock mines;	Ongoing	Bureau Chief	0.01				A
	Ongoing	Tom R	0.15				A
B. Review operating plans of hard rock mines upon submittal for potential violations of water quality statutes;	Ongoing	Abe H	0.02				A
		Tom R	0.20				A
	Ongoing	Ken K	0.30				A
C. Assist Reclamation division and the Forest Service in the development of EA's and EIS's for mining and milling projects;	Ongoing	Bureau Chief	0.02				A
	Ongoing	Tom R	0.14				A
	Ongoing	Ken K	0.30				A
D. Follow through on nondegradation decisions and petitions, monitor existing operations;	Ongoing	Abe H	0.10				A
	Ongoing	Tom R	0.13				A
	Ongoing	Ken K	0.10				A
	Ongoing	Contracts					B
SUBTOTAL FOR OBJECTIVE #2:			1.47				
CONTRACTS FOR OBJECTIVE #2:							
			0				

OBJECTIVE #3: KEEP THE SURFACE WATER AND NONDEGRADATION RULES IN COMPLIANCE WITH STATE AND FEDERAL REQUIREMENTS.

Activities required to accomplish Objective #3:

A. Review the rules and make necessary changes;	Ongoing	Abe H	0.22				A
	Ongoing	Don M	0.22				A
	Ongoing	Contracts					B

Planning Matrix

Technical Studies and Support/EPA-106

Fiscal Year 1997

By: Abe Horpestad

SUBTOTAL FOR OBJECTIVE #3:			0.440				
CONTRACTS FOR OBJECTIVE #3:							
OBJECTIVE #4: PROVIDE COMPUTER SUPPORT TO THE DIVISION STAFF.							
Activities required to accomplish Objective #4:							
A. Supplement local area-network in areas not adequately supported by the department;	Ongoing	Alan H	0.15				A
B. Research new hardware and software systems that will improve the ability of the division to fulfill its mission;	Ongoing	Alan H	0.06				A
C. Assist division staff in the use of department, state and federal computer systems;	Ongoing	Don M	0.11				A
	Ongoing	Alan H	0.10				A
D. Develop personal computer programs to support Division responsibilities; includes specification development for contracted services;	Ongoing	Don M	0.11				A
	Ongoing	Alan H	0.02				A
	Ongoing	Contracts					A
E. Maintain, repair, upgrade, and order new equipment;	Ongoing	Alan H	0.13				A
F. Retrieve data, including global position sensing reference data;	Ongoing	Alan H	0.02				A
	Ongoing	Don M	0.04				A
G. Provide training and support for staff use of the Department, State and Federal mainframe computer systems;	Ongoing	Don M	0.04				
H. Staff meetings and planning sessions;	Ongoing	Don M	0.01				A
	Ongoing	Alan H	0.05				A
SUBTOTAL FOR OBJECTIVE #4:			0.84				

Planning Matrix

Technical Studies and Support/EPA-106

Fiscal Year 1997

By: Abe Horpestad

CONTRACTS FOR OBJECTIVE #4:						
OBJECTIVE #5: PROFESSIONAL DEVELOPMENT.						
Activities required for the accomplishment of Objective #5:						
A. Attend EPA conferences and seminars; attend specialized training courses;	Ongoing	Abe H	0.02			A
	Ongoing	Tom R	0.02			A
	Ongoing	Don M	0.03			A
	Ongoing	Ken K	0.02			A
	Ongoing	Alan H	0.03			A
B. Read professional literature/Self training;	Ongoing	Abe H	0.02			A
	Ongoing	Tom R	0.02			A
	Ongoing	Don M	0.01			A
	Ongoing	Ken K	0.02			A
	Ongoing	Alan H	0.12			A
SUBTOTAL FOR OBJECTIVE #5:			0.310			

Planning Matrix

Technical Studies and Support/EPA-106

Fiscal Year 1997

By: Abe Horpestad

OBJECTIVE #6: COMPUTER SUPPORT FOR PLANNING, PREVENTION AND ASSISTANCE DIVISION.

Activities required for the accomplishment of Objective #6:

A. Retrieve information from the WATERBODY SYSTEM in the format required by the latest 305(b) guidance;	Ongoing	Alan H	0.02				A
B. Establish and maintain a computerized system to manage NPS demonstration project monitoring data and enter data as it becomes available;	Ongoing	Alan H	0.02				A
C. Establish, maintain, operate and update the wetlands data base;	Ongoing	Alan H	0.03				A
D. Establish, maintain, operate, and update the Biological Data System (BIOD);	Ongoing	Alan H	0.02				A
E. Establish, maintain, operate, and update the Enforcement computer Information system (ECIS);	Ongoing	Alan H	0.20				A
E. Establish, maintain, operate, and update the NPS stream Reach Tracking System (RTS);	Ongoing	Alan H	0.02				A
SUBTOTAL FOR OBJECTIVE #6:			0.310				

OBJECTIVE #7: PROVIDE TECHNICAL SUPPORT IN THE AREAS OF TOXICITY, STANDARDS INTERPRETATION, PERMIT LIMITS, AND EVALUATION OF THE ENVIRONMENTAL EFFECTS OF ACTIVITIES REGULATED BY STATE LAW.

Activities required for the accomplishment of Objective #7:

A. Consult with staff, other agencies and the public on questions of toxicity, nondegradation, water quality standards, permit limits, prepare public information, and hold public training sessions;	Ongoing	Abe H	0.25				A
	Ongoing	Tom R	0.13				A
	Ongoing	Ken K	0.13				A
B. Review EA's and EIS's from Reclamation and Energy divisions, US Forest Service, etc.;	Ongoing	Abe H	0.04				A
	Ongoing	Tom R	0.21				A
	Ongoing	Ken K	0.13				

Planning Matrix

Technical Studies and Support/EPA-106

Fiscal Year 1997

By: Abe Horpestad

	Ongoing	Contracts					A
SUBTOTAL FOR OBJECTIVE #7:			0.89				
CONTRACTS FOR OBJECTIVE #7:							

TOTAL FTE FOR THE SECTION		5		
CONTRACTS				
GRAND TOTAL FOR THE SECTION				

ASSUMPTIONS USED FOR THIS MATRIX:

- SALARY FOR STAFF ARE BASED ON AN AVERAGE ANNUAL COST PER EMPLOYEE OF 52,493 (84% EPA-106, AND 16% NON-FEDERAL.

COSTS SHOWN WERE DERIVED BY DIVIDING PROGRAM COSTS LESS CONTRACTS COSTS BY THE NUMBER OF EMPLOYEES

EPA-106 (AND "106) MEANS FUNDS FROM EPA UNDER SECTION 106 OF THE FEDERAL CLEAN WATER ACT

AMOUNTS SHOWN ARE APPROXIMATE DUE TO ROUNDING ERRORS

1 FTE = 2,080 WORK HOURS THUS .02 FTE = ABOUT ONE WEEK

WASTEWATER DISCHARGE PERMIT PROGRAM FY 1997

Montana's Wastewater Surface Discharge Permit Program began in 1968. With passage of Public Law (PL) 92-500 (Water Pollution Control Amendments of 1972), the federal NPDES Wastewater Discharge Permit Program was also created. In 1974 Montana applied for and received authority from the EPA to administer this program, thus minimizing a duplication of effort. The pretreatment and sludge programs have not been delegated to the state by EPA.

There are approximately 56 minor industrial, 18 major industrial, 82 minor municipal and 26 major municipal facilities that have individual MPDES permits. The state has also issued 12 general permits to date. Table #1 lists the breakdown of facilities that presently have general wastewater discharge permits. The general permits have been quite successful in minimizing permit issuance time for repetitive classes of permits.

Major, minor and most general permit facilities are tracked for compliance utilizing the PCS Database System. Permit fee regulations have been adopted and the program is now funded 100% by permit fees. Nondegradation and mixing zone regulations have been passed and result in new requirements being placed in MPDES permits. EPA provides the pretreatment and sludge requirements language to be inserted in the MPDES permits.

Table 1 GENERAL PERMIT SURVEY

<u>General Permit Category</u>	<u>Authorizations Currently Active</u>
Suction Dredge	4
Fish Farm	12
Construction Dewatering and well pumping	10
Disinfected Water Discharge	1
Facultative Sewage Lagoon	30
Concentrated Animal Feeding Operation	60
Produced Water	19
Petroleum Cleanup	2
Sand & Gravel	3
Storm Water Industrial	183
Storm Water Construction	174
Storm Water Mining and Oil	<u>75</u>
	573

Permits are issued for up to five years and reflect technology-based controls, Best Available Technology (BAT), and Best Practicable Technology (BPT); and where appropriate, water quality based controls using wasteload analyses and current water quality standards. Water quality variables for which effluent

limitations have been developed to protect the waters of the State include ammonia, total dissolved solids, DO, residual chlorine, fecal coliforms, turbidity, total suspended solids, BOD, temperature, various nutrients and toxics. Most of the major permits also contain whole effluent toxicity testing requirements to insure the effluent remain non-toxic to state waters.

All permits, new or renewals, must go through wasteload allocation analysis and review before they are issued. Based upon the results of the wasteload allocation analysis, stricter effluent limitations may be placed on the permittee to insure that State water quality standards are not exceeded.

Table 2 MAJOR PERMITS TO BE ISSUED, FY 1997

Major Industrial

Decker Coal West
Holly Sugar
Western Sugar
Stimson/Libby
Zortman Mining Inc.

Major Municipal

Billings
Kalispell
Bozeman
Livingston
Missoula
Helena

Specific priorities for FY 1997 include:

- * Implement new department organization and relocation,
- * Reduce backlog of expired major permits ensuring that water quality standards are met; toxic criteria limitations, effluent toxicity testing, pretreatment requirements, nondegradation requirements, mixing zone requirements and sludge handling requirements are imposed, and appropriate effluent limitations and selfmonitoring are provided,
- * reissue minor permits and issue new minor permits as required,
- * Provide timely complaint follow-up,
- * Provide compliance monitoring for all permittees as per workplan agreement, completing Form EPA-3560-3 for each and entering data into the Permits Compliance System (PCS),
- * Compliance monitoring dischargers where self-monitoring data is suspect,
- * Continue the QA program to assure accurate self-monitoring data for MPDES program,
- * Provide appropriate enforcement and report to the EPA, giving priority to major dischargers and federally-funded minor municipalities,
- * Provide timely review and appropriate notification on self-monitoring information. Enter Discharge Monitoring Report (DMR) data into PCS on a timely basis.
- * Review program goals and work priorities, in light of the new reorganization.

Surface Water Program

Planning Material
Fiscal year 1997

By Fred Shewman

F

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
GOAL #1: Implement Surface Water Program							
OBJECTIVE #1: Administration including planning, budgeting, public relations and staff supervision							
ACTIVITIES:							
A. Conduct administrative duties necessary for program maintenance and development; public relations; supply program information; develop policy; coordinate w/DEQ sections; answer public inquiries; develop budgets and contracts; write reports, grant applications; and plan. Develop 1998 program work plan.	Ongoing 1998 plan due 9-97	Fred Shewman	0.50				A
B. Supervise, assign duties, train, monitor and evaluate staff.	Ongoing	FS	0.20				A
C. Shared adm & overhead	Ongoing	Jan S, JK, JB, DH, Support Services Bureau	1.05				A
SUBTOTALS for Objective #1			1.75			Fees	
OBJECTIVE #2: Maintain the MPDES Program							
ACTIVITIES:							
A. Issue approximately 15 new and 40 renewal MPDES permits. Include WET, sludge, pretreatment and nondegradation requirements when necessary.	Ongoing	Sam Martinez Greg Wermers Joe Strasko Mike Pasichnyk	2.00				A
B. Pre-permit visits for quality control for MPDES	Ongoing as resources allow	SM, GW, JS, MP	0.20				B
C. Issue approximately 90 general permit authorizations per year.	Ongoing	SM, GW, JS, MP	0.15				A

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
D. Pre-authorization visit for quality control	Implementing as resources allow	SM, GW, JS	0.05				B
E. Revise fee regulations	9-97	FS	0.10				A
F. Compliance inspection of 25 majors.	Ongoing	GW, SM, JS	0.20				A
G. Compliance inspection of minors and general permit authorizations 50 per year plus 24 complaints per year	Approx. 75 visits	SM, GW, JS	0.40				B
H. Maintain PCS system, conduct monthly DMR meetings and followup initial enforcement	Ongoing	MP	0.60				A
I. Fees management - task order, compute billing, tracking payments, update tracking system.	Ongoing	Karen Anthony	0.40				A
J. Provide quarterly list of permits issued with WQS, WET, sludge, or pretreatment requirements	Quarterly	MP	0.00				A
K. Followup on yearly DMR/QA program (lab deficiencies)	Yearly	MP	0.02				B
L. Receive and give training	Ongoing	FS, SM, GW, JS, MP	0.13				B
M. Administrative support services	Ongoing	KA	0.60				A
SUBTOTALS for Objective #2			4.85			Fees	

OBJECTIVE #3: Spill Tracking and Response**ACTIVITIES:**

A. Receive and record into database approximately 300 spill reports per year, follow up as per spill protocol. Decide organizational placement of spill response in new department.	Ongoing	All personnel Mike Pasichnyk-lead	0.15				A
B. Extended followup on 3-4 major spills per year	Occasional	Mike Pasichnyk	0.05				A

Surface Water Program

Annex 1a
Fiscal year 1997

By Fred Shewman

P

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
C. Extra spill visits required to satisfy protocol	Occasional	Need 0.26 FTE	0				C
SUBTOTALS for Objective #3			0.20			Fees	

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
OBJECTIVE #4: Review Reclamation Division Operating Permit Applications							
ACTIVITIES:							
A. Review 5-8 mine applications per year for MPDES	Occasional	FS, GW, SM, JS	0.25				B
SUBTOTALS for Objective #4			0.25			Fees	
OBJECTIVE #5: Maintain the MPDES Storm Water Program							
ACTIVITIES:							
A. Issue authorizations under general permits	Ongoing	Roxann Lincoln Nicholas Bugosh	0.30				A
B. Administer contracts for compliance inspections, ECP and SWPPP Review, local educational programs, public service announcement.	7-96 to 6-97	RL	0.20				A
C. Public Information, Program updates, workshops/training, guidance document.	Ongoing Quarterly - Prog. Updates	RL	0.25				B
D. Review Storm Water Pollution Prevention Plans and Erosion Control Plans.	Ongoing	RL, NB	0.55				A
E. Compliance inspect sites.	Ongoing	RL, NB	0.30				B
F. Track/follow up noncompliance, complaints, enforcement.	Ongoing	RL, NB	0.20				A
G. Administrative Support services	Ongoing	Darla Hassler	0.50				A
SUBTOTALS for Objective #5			2.50			104(b)(3) Fees	
GRAND TOTALS			9.55		550,000	104 (b)(3) Fees	

Surface Water Program

Planning - Materials
Fiscal year 1997

P

By Fred Shewman

ASSUMPTIONS: 1.00 FTE = 1880 hours per year (at work)
1.00 FTE = \$60,733

FY97 DEQ Ground Water Program

Reorganization of the DEQ placed the FTEs that implement the Ground Water Program into the Planning, Prevention and Assistance Division (1.5 FTE), Remediation Division (1 FTE), Permitting/Compliance Division (4.1 FTE), and Enforcement Division (1 FTE). The individuals coordinate implementation of the Ground Water Program by maintaining informal communications throughout the year and formally meeting four times a year. The Montana Interagency Coordinating Group will be asked to facilitate coordination between DEQ and other agencies involved in implementing comprehensive ground water protection by forming a Ground Water Coordination Subcommittee.

Montana's Wellhead Protection Program is working cooperatively with Montana Bureau of Mines, Montana Rural Water System, Midwest Assistance Program and Montana University Water Resource Center to provide wellhead delineations for public water supplies prioritized in the approved program, schools and small public water systems. A fourth local water quality district was formed in Gallatin County and the Board of Environmental Review will be approving their water quality program. Program staff continue to work with the Montana Department of Agriculture to implement the Agricultural Chemical Ground Water Protection Act.

The 4.1 FTE assigned to the Permitting/Compliance Division will continue to implement the MGWPCS permit program and also will assist in reviews of projects potentially affecting state ground water quality standards, assuring compliance with those standards. With the advent of more hydrologically-connected discharges, the ground water personnel are becoming more involved in MPDES discharge permits involving discharges to surface waters that enter through the ground water. General discharge permits are also under consideration for ground water discharges from domestic sewage lagoons and from septic disposal sites.

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE I: Administer program including budgeting, staff supervision, planning and addressing regulatory and legislative issues.							
A. Conduct administrative duties necessary for program maintenance and support. Review monthly SBAS, monitor expenditures, develop FY97 work plan and SEA, monitor progress with plan, and develop FY98-99 budgets.	Ongoing FY97 Plan Sept 96	SP	.55				A
B. Provide support services to program including permit and public notice processing, tracking system data entry and maintenance, mailing, copying, filing, phone answering, etc. Fund portion of division administrator and division support staff.	Ongoing	DM (.5) JS/JK @.1 Need .5 FTE	.7				A
C. Supervise staff, assign duties, review work, conduct evaluations. Develop individual performance appraisals and conduct annual personnel evaluations. Hire new or replacement FTEs as needed.	Ongoing Appraisals	SP	.1				A
D. Update ground water regulations to address 1995 amendments. Develop strategy to implement regulation of municipal sewage lagoons and educate community representative. Respond to information requests and interpret statutes and regs for regulated community and public.	Strategy July 97 Info response ongoing	SP (.2) TW/TB JM/CD @ .05	.4				B
E. Develop UIC Class V program and submit application to EPA for authorization and funding.	Draft Program Ap. July 98	Need .5 FTE					C
F. Provide hydrogeologic expertise to the public, other division programs and agencies. Contract to fund graduate research projects related to ground water quality or pollution prevention .	As requested if funding available	SP	.05				B
SUBTOTAL		Need 1 FTE	1.8			State GW EPA	

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE II: Implement Wellhead Protection Program to protect ground water used by public water supply systems.							
A. Implement wellhead protection program in accordance with approved program description. Review applications for certification within 30 days, work with applicants to address deficiencies and certify approved programs.	Certification Review within 30 days	JM Need .5 FTE	.5				A
B. Develop and distribute wellhead educational materials such as program summaries and guidance, information displays, fact sheets, etc. and publish articles in statewide publications.	4 printings per year	JM	.05				A
C. Encourage development of local wellhead programs and provide training by speaking at city council meetings and Montana Rural Water Systems workshops, operator certification training, and other meetings or conferences.	8 talks per year	JM	.1 .05				B
D. Coordinate state-wide Water Education Calendar Poster Contest.	July 97	JM Need .05 FTE	.02				B
E. Assist MBMG and MT Rural Water Assoc. in their delineation of wellhead protection regions and help select communities and ensure delineations meet criteria. Attend meetings to educate and solicit participation in WHP. Distribute WHP guide developed by MBMG.	Bimonthly meetings	JM	.23				B
F. Coordinate with PWS and NRIS to develop WHP data base, and to produce maps.	July 97	JM	.05				C
SUBTOTAL		Need .85 FTE	.95			EPA	

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE III: Implement Montana Ground Water Pollution Control System permit program to control sources of pollution.							
A. Process MGWPCS permits: Review permit applications and renewals for nonsignificance and completeness, construction and design of containment and monitoring systems, draft permits and EAs, hold public meetings.	6 major 15 general permits/yr 20 permits/yr	TW/TB @ .4 CD .1 Need 1 FTE	.9				A
B. Conduct pre-permit, permit compliance and sampling inspections, write GW inspection reports, review self-monitoring data, monitor permit expiration, and notify permittees of compliance issues. Make recommendations to bring operations into compliance.	25 insp/yr	TB/TW @ .2 CD .25	.65				A
C. Respond to complaints related to ground water and conduct site investigations. Evaluate contaminated sites unregulated by other programs, review/recommend remedial actions, oversee cleanup and coordinate between all DEQ Divisions. Support 1.0 FTE WQ Specialist (complaint investigator) in Enforcement Program.	40 ongoing 10 new/yr 20 additional sites/yr	TW/TB @ .22 CD (.25) Vac 1 Need 1 FTE	1.69				B
D. Provide support for enforcement activities related to permit and ground water quality standards violations. Write notice of violations and informal enforcement letters. Make recommendations for formal enforcement actions, assist in order development, and monitor compliance with department or court orders. Support 0.4 FTE Attorney in Enforcement Program.	3 formal 10 informal cases/yr 20 informal	SP TW/TB @ .05 CD .4 Need .5 FTE	.55				B
E. Assist in review of hard rock operating permit applications, Haz waste, Superfund, UST and Solid waste sites as requested.	5 sites/yr 5 sites/yr	TB/TW @ .03 Need .5 FTE	.06				B

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
F. Develop general permits for categories of sources discharging to ground water (1) municipal lagoons, infiltration ponds and land application sites, (2) septage disposal sites, (3) industrial Class V UIC wells, and others as needed.	(1) July 97 (2) Oct 97 (3) Dec 98	TW/TB/CD @ .05 Need .1 FTE	.15				B
SUBTOTAL		Need 3.1 FTE	4			State GW EPA Fees	
OBJECTIVE IV: Pesticides in Ground Water and Nonpoint Initiatives.							
A. Fulfill responsibilities under MACGWPA. Follow MDA-DEQ MOU, coordinate with MDA on oversight and investigation of agrichemical releases and assist in review of pesticide management plan submitted to EPA.	5 sites/yr	CD	.25				A
B. Represent Ground Water Program on and participate in NPS Watershed/Ground Water committee in review and ranking of NPS Watershed Ground Water preproposals.	Quarterly meetings	CD	.05				B
C. Develop, submit and review and implement 319 proposals to address short or long-term goals of the ground water components of the Montana Nonpoint Source Management Plan.	July 97	CD JM Need .1 FTE	.05 .05				
SUBTOTAL		Need .1 FTE	.35			AG-GW EPA	

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
OBJECTIVE IV: Develop and implement the Local Water Quality Districts program to assist local governments in ground water pollution prevention.							
A. Consult with counties on development of LWQDs including, Flathead, Gallatin, Silver Bow and others that propose to form districts. Review program plans when submitted and write completeness reviews.	Biannual meetings 1 new plan per year	CM Need .1 FTE	.15				A
B. Assist in the board review and approval of WQD programs. Review annual WQD reports, process requests for enforcement authority, track compliance with program plans and enforcement authorizations, and maintain status data base.	3 reviews per yr 3 enf auth/yr	CM	.1				A
C. Coordinate with other division programs to enhance implementation of district programs and to encourage formation of districts to support wellhead programs.	Ongoing	CM	.05				B
SUBTOTAL		Need .1 FTE	.3			LWQD	
OBJECTIVE V: Develop and implement a Comprehensive Groundwater Protection Program. Assist in statewide coordination efforts to optimize use of state resources, exchange data and to identify and fill gaps.							
A. Review EPA comments CSGWPP, update and resubmit plan.	Final Plan Jan 97	CM	.1				A
B. Participate in other groups to enhance and coordinate ground water quality protection: (Ground Water Assessment Steering Committee, Montana Watershed Council).	Bimonthly and Quarterly meetings	CM	.05				B
C. Inform public and agencies of plan recommendations and assist agencies in implementation of recommendations specified in plan.	May 97	CM Need .2 FTE	.05				B
SUBTOTALS		Need .2 FTE	.2			EPA LWQD	

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
TOTAL - Activities described in this matrix are implemented by the Department of Environmental Quality: Permitting/Compliance Division, Planning, Prevention and Assistance Division, and Remediation Division		Need 7.25 FTE	7.6			see summary	

FUNDING/FTE SUMMARY SOURCE

<u>SOURCES</u>	<u>POSITION</u>	<u>FTE</u>
State GW	Division Adm.	0.1
EPA	Division Adm. Support	0.1
Permit Fees	Env. Program Manager	1.0
AG-GW	Water Quality Specialist IV	2.0
LWQD	Water Quality Specialist III	3.5
	Attorney	0.4
	<u>Administrative Asst.</u>	<u>0.5</u>
	Total FTE	7.6

PUBLIC WATER SUPPLY

The first Montana Public Water Supply law was enacted in 1907. This law was revised in 1977, 1979, 1991, and 1995, to enable Montana to receive and retain delegation for the administration of the Federal Safe Drinking Water Act (SDWA) (PL 93-523). The Public Water Supply Program (PWSP) has adopted and received primacy for the Total Coliform Rule (TCR), the Surface Water Treatment Rule (SWTR), the Public Notification Rule (PNR), the Phase I rule, the lead and copper rule (LCR) and the Phase II/V Rule. In FY 1995, the PWSP also adopted rules for administrative order procedures and penalties.

The 1991 changes in the law allowed DHES to develop a fee schedule to assess service connection fees and plan review fees to recover costs of administering the law. In November of 1991, the Board of Health and Environmental Sciences (BHES) adopted the rules that established the assessment and collection of service connection fees. In July of 1992, the BHES adopted rules that established the fees for plan review. A total of approximately \$557,000 was collected in FY 1996 in service connection fees and plan review fees.

Service connection fee funds were used to hire additional employees, bringing the total to 20.45 FTEs in the program.

The PWSP regulates all public water supplies (PWSs). PWSs are those supplies which have at least 15 service connections or serve 25 people per day for 60 or more days per year. The 1995 legislature changed the definition from 10 to 15 service connections, effective October 1, 1995. The inventory of Montana's PWSs varies in number but currently includes about 700 community systems, 1050 transient noncommunity systems and 225 non-transient non-community systems.

The chemical quality of drinking water in western Montana is generally considered good. Many PWSs in eastern Montana have high levels of dissolved solids, sulfates, sodium, iron and manganese. These problems are generally not a public health threat. Some PWSs in western Montana still use surface water without filtration and occasionally have turbidity problems. Many groundwater supplies in western Montana obtain water from shallow groundwater sources. These supplies are relatively susceptible to microbiological contamination and to contamination from man-made chemicals.

Several systems have exceeded the maximum contaminant level (MCL) for nitrate in the past. The PWSP requires these systems to provide bottled water from an approved source for infants and pregnant mothers and is working with these supplies to achieve long-term solutions. Nitrate problems have been resolved through treatment or blending with low-nitrate water. Recent Phase II/V sampling has shown some additional systems have nitrate and/or nitrate exceedances. The PWSP continues to work with these systems also to resolve this problem.

Montana has about nine community supplies that exceed 4.0 mg/l in fluoride. These systems are required to give public notice and provide bottled water for those who prefer it. The department has been working with these systems in order to find an affordable solution to the fluoride problem.

Unfiltered surface water has been one of the state's major concerns for the past several years. The PWSP issued 8 administrative orders in FYs 1994 and 1995, and plans to issue additional administrative orders in 1996 and 1997 to the PWSs that cannot meet the requirements of the surface water treatment rule. Other orders may be issued to significant non-compliers (SNCs) of the TCR, the Phase 2/5 Rule, and the LCR. Several new treatment plants have been constructed in the past several years that have eliminated some of the most serious problems. Several outbreaks of giardiasis have occurred before in Montana. The public water supply program has taken action to see that the risk from Giardia and other waterborne pathogens is minimized until filtration is installed, or until existing filtration plants are upgraded to meet the requirements of SWTR. The program has personnel on staff who specialize in the area of Giardia filtration and control. A procedure known as the microscopic particulate analysis (MPA) has been used to evaluate surface water source quality and filtration efficiency. The MPA analyzes the microscopic content of the water. Program staff and contracted consultants will also investigate shallow wells and springs in 1997 to determine whether they are influenced by surface water.

Over the past several years, the program has developed a detailed method of evaluating all aspects of the performance of water filtration plants. The method is patterned after the wastewater industry's Comprehensive Performance Evaluation (CPE) process. CPEs have been performed on 17 of Montana's surface water treatment plants. Composite Correction Programs (CCPs) are a follow-up technical assistance effort directed at plants that have problems that were identified during a CPE. CCPs have been completed at Miles City, Conrad, Loma and Harlem. Unfortunately, no additional CPEs or CCPs were performed in 1996 due to legislative, enforcement and regulatory compliance issues, and department reorganization. The CPE/CCP program is relatively new to the drinking water industry and there has been a great deal of interest shown by other states, the American Water Works Association (AWWA), the AWWA Research Foundation, the Association of State Drinking Water Administrators (ASDWA) and the Environmental Protection Agency (EPA). The work completed in Montana and more recently in a few other states has been used by EPA's Center for Environmental Research Information to develop a "Summary Report" titled Optimizing Water Treatment Plant Performance With The Composite Correction Program (EPA/625/8-90/017). An EPA handbook has also been distributed nationwide.

The Division's local area network system of IBM computers (PCs) provides easy access for all staff members to the PWSP's Advanced Revelation database. Programs have been written to compute monthly compliance using the new total coliform regulations. Turbidity and most chemical analysis data can also be entered into the database. Compliance determinations cannot yet be made for all parameters. Programming efforts are nearly complete for the Phase II and Phase V Rules. Programming for the Lead and Copper Rule is essentially complete.

On July 1, 1995, the PWSP became part of the new DEQ. The PWSP relocated to the Metcalf Building at 1520 East Sixth Avenue in March of 1996.

Refer to the matrix for the priority objectives for FY 1997.

Program DRINKING WATER Fiscal Year 1997 By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL I: Develop legislation, new rules and rule changes to allow effective program growth and implementation.							
Objective 1: Prepare proposed viability rule	06/30/97	Mark, Jim,	.06	\$			B
Objective 2: Prepare rule revisions	12/31/96	PWS Staff	.11				B
Objective 3: Final proposed cross-connection control program rule	12/31/96	Marc	.05				B
SUBTOTAL			.22	\$ RC 59612	\$	\$ EPA Fees RIT	

47

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week
1.00 FTE = \$49,086

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL II: Prepare for hiring of additional staff; revise PDs as necessary							
Objective 1: Replacement of staff in vacant positions	as needed	Jim, Mark, Marc	0.10				A
Objective 2: Submit revised engineering position descriptions to Personnel Unit	06/30/97	Mark, Gary, Marc, new engineers	.06				B
SUBTOTAL			.16	0	\$	\$ EPA Fees RIT	

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1.00 FTE = 2,080

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL III: Effectively administer day-to-day PWSP duties and coordinate activities between work units.							
Objective 1: Develop draft of Program Plan for FY 1998.	08/01/97	Jim, Mark, Marc	.04				A
Objective 2: Develop Annual Work Plans for Engineering and Field Services Programs.	10/15/97	.05 FTE Needed					C
Objective 3: Project and track expenditures closely to insure grant and fee income is adequate for program operations; make projections for upcoming fiscal years.	Ongoing	Jim, Mark, Marc	.04				A
Objective 4: Hold weekly program meetings	Ongoing	PWS Staff	.30				B
Objective 5: Implement optimistic, but realistic performance standards; perform annual performance evaluations.	Ongoing	Jim, Mark, Marc	.23				A

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week
 1.00 FTE = \$49,086

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
Objective 6: Weekly managers meetings.	Ongoing	Mark, Marc, Div. Adm., Jim	.15				A
Objective 7a: Miscellaneous manager responsibilities.	Ongoing	Mark, Marc, Steve, Jim	.75				A
Objective 7b: Misc. other responsibilities; e.g. more completely monitor individual activities and accomplishments, communication/coordination with other agencies, continue regular PWS task force activities and meetings etc.		Need 0.5 FTE					C
Objective 8: Develop 5-year program plan		Need 0.04 FTE					C
Objective 9: Budget preparation, EPP misc. tasks	Ongoing	Div. Adm., Jim, Marc, Mark	.10	0	0		A
SUBTOTAL		Need 0.59 FTE	1.61	0	\$	\$ EPA \$ Fees \$ RIT	

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1.00 FTE = \$40,080

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL IV: Conduct Sanitary Surveys of Public Water Systems and Small Wastewater System Inspections.							
Objective 1a: Helena and Polson Offices to conduct approximately 50 water system sanitary surveys and 10 wastewater inspections.	ongoing	PWS Staff	.45	0.00			A
Objective 1b: Helena and Polson Offices to conduct approximately 30 water system sanitary survey and 15 wastewater system inspections.		Need 0.2 FTE					B
Objective 1c: Complete reports in a timely fashion, act to correct deficiencies found during inspections.		Need 0.5 FTE					B
Objective 1d: Conduct regular field visits at water and wastewater facilities not scheduled for sanitary surveys.		Need 0.5 FTE					C
Objective 2a: Provide for regular sanitary surveys and water sampling of small public systems through administration of county contracts.	Ongoing	PWS Staff	.20	\$			A
Objective 2b: Evaluate county survey reports closely & follow up on reported deficiencies in a timely fashion; prepare instructions and answer questions in a timely fashion, prepare & revise contracts in a timely fashion.		Need 0.9 FTE					C

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1.00 FTE = \$49,086

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
Objective 3a: Provide for regular sanitary surveys and water sampling of small community water systems through the administration of contracts with private consultants.	Ongoing	Terry, Marc	0.47	\$			A
Objective 3b: Evaluate contracted survey reports closely and follow up on reported deficiencies in a timely fashion.		Need 0.45 FTE					B
Objective 4: Provide sanitary survey training for county sanitarians and new staff through contracts with private consultants and PWS staff.	3/31/97	Marc, PWS Staff	0.04	\$			B
SUBTOTAL		Need 2.55 FTE	1.16	\$ RC 59611 \$ RC 59612	\$	\$ EPA \$ Fees \$ RIT	

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1 FTE = \$10,080

Program **DRINKING WATER**Fiscal Year **1997**By **MELSTAD, SMITH & GOLZ**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL V: Provide training services to water and wastewater operators and managers and to the general public to facilitate better operation and maintenance of public water and wastewater facilities and better understanding of the public health aspects of public water supplies.							
Objective 1: Conduct 2 annual water and wastewater operator schools in Billings and Bozeman.	Mar 12-14, 1997 & Sept. 22-26, 1997	Rick et.al	0.4	0.00			A
Objective 2a: Conduct 21 days of training activities, not including water school, sponsored by the WQB, METC or MRWS.	Ongoing	Rick, et.al	0.45	0.00			A
Objective 2b: Conduct an additional 10 days of specialized training sponsored by WQB and/or METC, additional prep. for training		Need 1.3 FTE					C
Objective 3a: Review and write 2 versions of the new water operator exams including a new exam for water bottlers. Review new study materials for bottlers.	12/31/96	Shirley, Jim, Marc et.al	0.04	\$			A
Objective 3b: Develop water treatment exams and study materials for systems served by wells and surface sources							C
Objective 4: Prepare 1996 METC annual training calendar for water and wastewater operators	11/01/96	Rick	0.04	0.00			A
Objective 5: Serve as advisory and voting members of METC Steering Committee	Ongoing	Rick, Marc	0.08	0.00			A

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1.00 FTE = \$49,086

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
Objective 6: Continue development of training materials on the purpose and public health implications of the SDWA and operator certification programs	Ongoing	Field Serv.	0.03	0.00			A
Objective 7: Develop audio/visual training materials for GWUI, SDWA amendments, and public notification, and other water operator training and public education topics	Ongoing	Rick, Eric et.al.	0.06	\$			A
Objective 8: Provide contracted training for conducting CPE, for assistance with CPEs, administrator training, general water treatment plant operator training	Ongoing	Marc	0.10	\$			B
Objective 9: Fund technical trainer and half time support staff for Montana Environmental Training Center	Ongoing	Marc, Rick	0.02	\$			A
Objective 10: Maintain operation guide books for public water suppliers that compile monitoring and reporting requirements	Ongoing	Sara	0.05				B
Objective 11: Assist water suppliers in wellhead protection efforts.	Ongoing		0.04	\$	0		
SUBTOTAL		Need 1.30 FTE	1.31	\$ RC 59611 \$ RC 59612	\$	\$ EPA \$ Fees \$ RIT	

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1.30 FTE = 52,080

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL VI: Provide technical assistance to operators and managers of water and wastewater facilities to solve specific problems.							
Objective 1a: Conduct 2 CPEs at surface water treatment plants	Ongoing	Marc, John, Terry, PWS staff	0.40	0.00			B
Objective 1b: Conduct an additional 2 CPEs and 1 CCP at surface water treatment plants		Need 0.4 FTE					C
Objective 1c: Additional tech. asst. for follow-up to CCPs		Need 0.3 FTE					C
Objective 2: Implement contracted services to provide technical assistance to small systems and follow-up to boil orders and health advisories	Ongoing	Rick	0.33	\$			A
Objective 3a: Implement boil order policy	Ongoing	PWS Staff	0.40	0.00			A
Objective 3b: Additional assistance for 3a		Need 0.5					
Objective 4a: Provide emergency response to contamination events in addition to boil orders	As Needed	PWS Staff	0.10	0.00			A
Objective 4b: Additional assistance for 4a		Need 0.50					
Objective 5: Finalize and implement emergency response plan	01/31/97	Rick	0.06	0.00			B

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1.00 FTE = \$49,086

Program **DRINKING WATER**Fiscal Year **1997**By **MELSTAD, SMITH & GOLZ**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
Objective 6: Draft groundwater CPE approach objectives and factors	06/30/97	Need 0.25 FTE		0.00			C
Objective 7a: Provide general assistance and education to the general public and operators	Ongoing	PWS Staff	0.60	0.00			A
Objective 7b: Provide for additional general assistance to operators and the public		Need 2.0 FTE					C
Objective 8: Provide funds for special water sampling for VOCs, SOC, IOC	Ongoing			\$			A
TOTAL		Need 3.95 FTE	1.89	\$ RC 59611 \$ RC 59612	\$	\$ EPA \$ Fees \$ RIT	

ASSUMPTIONS: 0.02 FTE = 40 hours = 1 week

1.00 FTE = \$40,084

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
Objective 4a: Provide oversight of contracted consulting services for assistance with review of approximately 200 sets of plans and specifications.	Ongoing	Mark	0.27	\$			A
Objective 4b: Provide for regular review of consultant's work, provide regular training updates and policies and procedures change.		Need 0.10 FTE					B
TOTALS		Need 4.05 FTE	1.44	\$ RC 59612	\$	\$ EPA \$ Fees \$ RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL VIII: Develop and maintain data management system and provide clerical support for PWSP							
Objective 1: Develop software for PWSP							
1. Enhance Phase II/V software.	12/31/96	Bruce, Chris	.57				A
2. Enhance/Modify other software.	On-going	Bruce, Chris	.45				A
3. Provide support for field offices	On-going	Bruce	.10				B
4. Enhance long-term coliform MCL software.	01/31/97	Bruce	.10				B
5. Develop sanitary survey tracking software		Need 0.10 FTE					C
6. Develop Rad compliance software.		Need 0.10 FTE					C
SUBTOTAL		Need 0.20 FTE	1.22	RC 59612		EPA Fees RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
 1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

GOAL VIII: (continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 2: Maintain electronic database for PWSP							
1. Develop capability to import LIMS data	06/30/97	Bruce, Chris	.10				A
2. Develop method to archive AREV data		Need .08 FTE					C
3. Develop plan for labs to report electronically		Need 0.10 FTE					C
SUBTOTAL		Need 0.18 FTE	.10	RC 59612		EPA Fees RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
 1.00 FTE = \$49,086

November 13, 1996

Program **DRINKING WATER**Fiscal Year **1997**By **MELSTAD, SMITH & GOLZ**

GOAL VIII: (Continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 3:							
1. Continue electronic SDWIS reporting	On-going	Bruce, Chris	.34				A
2. Generate chemical and inventory printouts for counties	02/01/97	Bruce, Chris	.04				A
3. Review submitted LCR data & prepare for data entry.	On-going	Chris	.05				A
4. Develop data verification/validation plan		Need 0.10 FTE					C
5. Write data flow manual for PWSP		Need 0.10 FTE					C
SUBTOTAL		Need 0.2 FTE	0.43	0		EPA Fees RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
 1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

GOAL VIII: (Continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 4: Provide other technical and clerical support							
1a. Provide data base technical support, generate reports for A and B priority activities.	On-going	Chris	.25				A
1b. Provide above support for C activities		Need 0.25 FTE					C
2. Provide timely mailing, filing and AREV data entry of coliform, inorganic, LCR and chemical data, including LIMS data	On-going	Position 5501	.40				A
		Sandi	.40				
		Paula	.45				
		temporary					
3. Update AREV PWS inventory	On-going	Sara	.20				A
		temporary					
4. Plan & Spec Review-related services	On-going	Sara	.15				A
↓	↓	↓	↓	↓			↓

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
 1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

GOAL VIII: (Continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 4: (Continued). . Provide other technical and clerical support							
5. General office support services	On-going	Sara	.10				A
		Sandi	.30				
		Paula	.30				
		Erin	.10				
		Cookie, Janet K.	1.2				C
		Temporary					
		Need 0.5 FTE					
6. Fee-related support services	On-going	Chris	.03				A
		Sara	.55				
SUBTOTAL		Need 0.75 FTE	4.33			EPA Fees RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORIT Y
			FTE	CONTRACTE D SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL IX: Provide for effective formal enforcement procedures for PWSP							
Objective 1a: Assist Enforcement Section to finalize and monitor AOs for unfiltered surface water supplies that must filter	12/31/96	Marc, Betsy John, Jim	.20				A
Objective 1b: Review and comment on documents and reports submitted in response to AOs for unfiltered surface water systems.	Ongoing	Betsy, PWS Staff	.20				A
Objective 2: Assist Enforcement Section to finalize and monitor AOs for filtered water supplies that are not in compliance.	03/1/97	Betsy, Marc, John, Jim	.15				B
Objective 3a: Participate in other formal enforcement activities, including planning, negotiation, Div. enf. mtgs., preparation of other formal orders or judicial actions.	On-going	PWSP staff, Betsy, Bob, Claudia	1.23				A
Objective 3b: Provide adequate FTEs incl. lawyers and paralegals for participation in BCA, AO and civil actions with non-complying PWSs, and for consultation with staff regarding enforcement issues.		Need 1.7 FTE					C

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORIT Y
			FTE	CONTRACTE D SERVICES	TOTAL \$	FUNDING SOURCE(S)	
Objective 4: Investigate complaints, other misc. Enf. Section and Legal Unit responsibilities.	On-going	PWSP Staff, Rob, Besty, Claudia, other Enf. Section Staff	1.50				A
TOTAL		Need 1.7 FTE	3.28			EPA Fees RIT	

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL \$	FUNDING SOURCE(S)	
GOAL X: Provide effective oversight and monitoring for PWSP rules in accordance with EPA PWSS Priority Guidance.							
Objective 1a: Implement TCR & PN rules, monitor sample results, reporting and public notification for compliance with PWSP rules and provide informal enforcement follow-up other than as provided in Goal VI, Objective 3.	On-going	PWS staff	1.0				A
Objective 1b: Complete implementation of tasks in 1a, including assistance to PWSs with resolution of positive non-acute coliform sample results.		Need 3.0 FTE					C
Objective 2a: Monitor self-monitoring results submitted by PWS's, do follow-up as needed. (Does not include compliance monitoring data for surface water systems. This is covered in 3 below.)	On-going	PWS Staff	.10				A
Objective 2b: Complete implementation of tasks in 2.		Need 1.5 FTE					C

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
 1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORIT Y
			FTE	CONTRA CTED SERVICE S	TOTAL \$	FUNDING SOURCE(S)	
Objective 3a: Implement SWTR for unfiltered systems, and as many filtered systems as possible.	On-going	PWS Staff	0.70				A
Objective 3b: Complete implementation of tasks in 3a.		Need 3.0 FTE					C
Objective 3c: Implement GWUI policy and make GWUI determinations.	Ongoing	Marc, Terry, Eric	.10				A
Objective 3d: Complete implementation of tasks in 3c.		Need 2.0 FTE					C
Objective 4a: Continue implementation of LCR for all systems > 3300 and for all systems that exceed lead action levels.	On-going	Richard, PWS Staff	.60				A
Objective 4b: Complete implementation of LCR for all systems.		Need 3.0 FTE					C

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = \$49,086

November 13, 1996

Program DRINKING WATERFiscal Year 1997By MELSTAD, SMITH & GOLZ

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORIT Y
			FTE	CONTRACTED SERVICE S	TOTAL \$	FUNDING SOURCE(S)	
Objective 5a: Implement Phase II & V rules for acute contaminants for community systems.	On-going	Gary, Chris, Craig	.20				A
Objective 5b: Implement vulnerability assessment program and enforce initial monitoring requirements for community systems serving > 150 service connections.	Ongoing	Craig, Chris, Gary	.25				A
Objective 5c: Follow up on MCL violations for all systems.		Craig, Chris, Gary	.25				A
Objective 5d: Complete implementation of Phase II and V Rules, including technical assistance for vulnerability assessments for all systems and follow up for monitoring violations and detects < MCL.	Ongoing	Need 3.0 FTE					C
Objective 6a: Preparation for implementation and misc. tasks associated with EPA rules that are yet to be promulgated.	On-going	PWS Staff	.10				B
Objective 6b: Complete implementation and misc. tasks associated item 6b, including providing review and comments of proposed EPA rules.		Need 1.5 FTE					C
SUB-TOTAL		17.0 FTE Needed	3.30	RC 59611 RC 59612		EPA Fees RIT	
TOTAL			20.45	0	0		

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = \$49,086

November 13, 1996

MUNICIPAL WASTEWATER ASSISTANCE SECTION

This section's primary activities are to provide financial, technical, and training assistance to Montana communities to build and operate wastewater treatment and collection facilities. The section provides financial assistance through the administration of the EPA Construction Grants program and the Montana State Revolving Fund (SRF) loan program. The passage of the Federal Clean Water Act in 1972 created the Construction Grants program which has provided over 200 million dollars in Montana to build needed water pollution control facilities. The 1987 Amendments to the Act sunset the Grants program and concurrently created the State Revolving Fund. The administration of the Grants program has been fully delegated to the state since the late 1970's. The section has 4 active grant projects which will be closed out over the next several years. Workplan tasks associated with these projects include reviewing the design and construction of grant-funded facilities. Administratively closing out grant projects which have completed construction is another major task of the section. The level of effort required to administer this program will continue to decline in fiscal year 1997 with some shifting of staff responsibilities to the SRF program.

The State Revolving Fund (SRF) loan program provides low interest loans to communities to build wastewater projects in a manner similar to the Construction Grants program. The loan program will allow funding of some projects (i.e., storm sewers) which were not eligible under the Construction Grants program. All funds loaned out must return to the SRF in the form of loan repayments to provide a self-perpetuating form of financial assistance. Loans are made up of 83.33% federal funds and 16.67% state match. While certain federal requirements are imposed on first-round loans, many will no longer apply after the funds revolve.

The loan program made its first four loans in 1991 totaling 8.9 million dollars and has since closed a total of 33 loans for over 41 million dollars in project funds. The SRF program adopted many of the technical requirements of the Construction Grants program and added financial requirements inherent to any loan program. The Montana Department of Natural Resources and Conservation and specialized financial consultants are used, under contract, for financial expertise in this program. As new loans are funded, administrative requirements will increase. The loan program must be managed to protect the state and federal interests in the program yet still provide an affordable source of funding for Montana communities.

Needs in Montana for wastewater facilities will continue to grow. Projects selected for assistance must be placed on the annual Project Priority List which determines order of need according to severity of public health hazards or environmental problems. Currently, the greatest needs in Montana are for small unsewered communities which have failing septic systems and need a centralized sewer system. High growth rates in western Montana have resulted in the overloading of existing treatment systems. Another significant need in this state relates to decaying infrastructure which requires updating or replacement. Water quality standards in high priority watersheds may require additional community investment in water pollution control systems. Increased user costs and affordability will be an issue that financial assistance programs and local governments must contend with in the future.

The proper operation and maintenance of existing facilities is necessary to preserve the investment of public funds in wastewater facilities as well as maintain compliance with water quality standards.

The Municipal Wastewater Assistance Section, in conjunction with MSU-Northern, directs the Montana Environmental Training Center (METC) which is partially funded with federal construction grants assistance (109 (b) funds). The Training Center's primary mission is to provide operators and managers with training and technical assistance in all aspects of facility operations. Section staff participate in the development of the annual training program which is facilitated by METC. Staff also frequently provide training for operators and administrators at workshops and schools sponsored by METC. Specific training subjects to be covered in fiscal year 1997 include compliance with the new Federal Part 503 sludge regulations, compliance with the state's recently implemented nondegradation rules, as well as safety and health issues. The section also provides on-site training to wastewater operators when it appears that this method of training is most effective. Often new operators benefit most from on-site assistance. Also, the section supports the Department's Operator Certification program by providing resources for a variety of needs within that program.

A restructured wastewater treatment plant inspection program is being implemented through the section's technical assistance program with the goal of identifying existing and potential performance-limiting factors at wastewater facilities. Pollution prevention methods will be stressed during the plant evaluation process. Inspectors will try to visit all municipal treatment facilities every three-to-five years. An effort began in 1994 and continuing into 1997 is to evaluate nondischarging lagoons to determine their potential impacts on water quality.

A former employee developed and implemented a Municipal Water Pollution Prevention program utilizing grant funds made available through a special grant received from EPA. A new employee, hired in 1996, will continue implementing the Pollution Prevention program goals and objectives. The purpose of the grant was to allow states to develop and implement pilot programs to: a) assist in maintaining a high rate of MPDES permit compliance; b) maximize the useful life of municipal wastewater facilities through effective operation and maintenance, and control of pollutant flow and loads; and, c) ensure effective and timely planning for future needs before problems occur. Pollution prevention activities planned by the section include continued implementation of the self-assessment process which has been developed for wastewater plants, modification of the inspection program to more proactively consider problems, continuation of our public education efforts through brochures and public service announcements and a youth education program. A water conservation pilot program is being sponsored by the agency to evaluate effectiveness of certain conservation measures as they relate to needed upgrades of water and wastewater systems.

Contact for this program is Thomas J. Slovarp, Environmental Engineer Manager, telephone (406) 444-5323.

MUNICIPAL WASTEWATER ASSISTANCE PROGRAM

Fiscal Year 1997 Plan

MISSION STATEMENT:

TO PROTECT, ENHANCE, AND RESTORE MONTANA'S WATERS THROUGH THE PROVISION OF TECHNICAL, FINANCIAL, AND TRAINING ASSISTANCE TO MUNICIPAL WATER POLLUTION CONTROL FACILITIES.

FINANCIAL ASSISTANCE PROGRAM OBJECTIVES:

- I. Provide effective program administration.
- II. Close out the Construction Grants Program as per the 1997 Closeout Strategy and annual state workplan.
- III. Manage the State Revolving Fund Loan Program as per the Operating Agreement between EPA and the DEQ.
- IV. Assist small communities in obtaining affordable financing.

ACTIVITIES:

I. Administration

- A. Conduct administrative duties necessary for program maintenance and development, develop and track budgets and contracts, write reports, and conduct program planning.
- B. Supervise, assign duties, fill positions, train, monitor and evaluate staff.
- C. Provide administrative support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.
- D. Promote consistent work methods among section staff.

II. Construction Grants Program Management

- A. Provide projections for outlays and obligations to EPA on an annual basis.
- B. Review facility plans for twenty-seven (27) active projects (Belgrade, Bozeman, Box Elder, Columbus, Deer Lodge, Drummond, East Missoula, Eureka, Fairfield, Hamilton, Harlowton, Havre, Hot Springs, Judith Gap, Lewis & Clark County/Helena Valley, Lincoln/Lewis & Clark County, Polson, Rae, Red Lodge, Roundup, Superior, Sweetgrass, Troy, Valier, Westshore/Lake County, Whitefish, Wisdom). Provide Advance of Allowance grants for sixteen (16) new planning projects (Alder, Alberton, Augusta/Lewis & Clark County, Choteau,

Culbertson, Eureka, Gallatin Gateway/Gallatin County, Geraldine, Harrison, Hilger, Joplin, Judith Gap, Lambert, Libby, Nashua, Richey).

- C. Review designs for five (5) grant-funded projects (Box Elder, Deer Lodge, Hobson, Ronan, Superior). Coordinate nondegradation policy issues concerning these projects with Permits Section.
- D. Manage projects which are currently in construction. Initiate operations at four (4) projects (Box Elder, Deer Lodge, Hobson, Ronan).
- E. Administratively complete three (3) projects (Somers, Flathead/Evergreen, Whitefish County).
- F. Obtain positive performance certification from two (2) projects (Whitefish County, Reedpoint).
- G. Complete biannual U.S. EPA Needs Survey.
- H. Perform periodic MBE/WBE activities.
- I. Implement Closeout Strategy for the program.

III. State Revolving Fund Loan Program

- A. Provide projections for outlays and obligations to EPA on an annual basis.
- B. Close up to nine (9) loans prior to the end of the planning period. Likely borrowers include: Cascade, Glasgow, Harlowton, Lincoln/Lewis & Clark County, Ronan (Ph. II), St. Marie, Townsend, Valier, Vaughn.

Manage all projects in accordance with the operating agreement and program documents developed under the capitalization grants awarded through October 1996.

- C. Provide input to our congressional delegation on adjustments to the SRF program during the reauthorization process currently underway for the Clean Water Act.
- D. Develop a SRF program marketing strategy and actively market the SRF program to communities throughout the state. Meet with ten (10) communities to discuss the program. Obtain feedback from existing borrowers to improve the SRF program and expand utilization. We will also apply for a Marketing Grant.
- E. Revise the SRF application to make the document more informational and user friendly.

- F. Consider a small community program to operate in conjunction with the Montana Board of Investments, including assistance for planning.
- G. Develop and implement the SRF database which is being prepared for program management.
- H. Using EPA's model specification inserts, develop these documents to incorporate all federal and state program requirements into one useful package.
- I. Make adjustments to the SRF Handbook of Procedures to improve its usefulness and consistency.
- J. Work with DNRC to develop SRF Handbook of Financial Procedures which includes loan underwriting criteria.
- K. Complete biannual U.S. EPA Needs Survey.
- L. Perform periodic MBE/WBE activities.
- M. Continue to enhance staff knowledge of public finance.
- N. Implement nontraditional uses of SRF funds, in particular, the funding of landfills and storm sewers. Develop administrative rules as needed.
- O. Develop and implement a new revolving loan program for drinking water projects.

IV. Small Community Outreach Program

- A. Help communities initiate the planning process including the use of EPA-funded Advance of Allowance grants.
- B. In conjunction with the reauthorization of the Clean Water Act, work with our congressional delegation and other agencies to promote a financial assistance program designed for small, needy communities.
- C. Identify small communities with known needs. Contact these towns and offer outreach help which consists of technical and financial assistance. Hold workshops to assist these communities in planning and financing wastewater facilities. Educate administrators in the process of hiring technical consultants.
- D. Consider application of program for small projects and streamline the requirements wherever possible.

TECHNICAL ASSISTANCE PROGRAM OBJECTIVES:

- I. Provide effective program administration.
- II. Proceed with the Pollution Prevention Program based on the current process used to evaluate wastewater treatment facilities.
- III. Train wastewater facility operators and administrators in plant operations.
- IV. Through education and on-site assistance, assist communities in complying with Federal Part 503 sludge regulations, new State nondegradation regulations and water quality standards established to protect priority watersheds.
- V. Plan, specification and project review.
- VI. Develop a public education program to improve the understanding of the need for wastewater treatment.
- VII. Integrate nonpoint source (NPS) pollution control activities into the SRF funding framework.

ACTIVITIES:

I. Administration

- A. Conduct administrative duties necessary for program maintenance and development, develop and track budgets and contracts, write reports, and conduct program planning.
- B. Supervise, assign duties, fill positions, train, monitor and evaluate staff.
- C. Provide administrative support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.
- D. Through strategic planning, evaluate the technical assistance program to redefine purpose and needs.

II. Municipal Water Pollution Prevention Program (MWPP)

- A. Proceed with the MWPP program consistent with the and May 1995 grant proposal submitted to EPA. Key elements of the proposal include:
 - i. Evaluate 5-10 systems annually looking at plant operations, design, administration and pollution prevention opportunities.

- ii. Identify existing and potential performance-limiting factors. Provide report to community.
 - iii. Work with facility administrators to address performance-limiting factors through O&M training and/or capital improvements. Direct municipalities in obtaining needed technical or financial assistance. Follow-up on these activities to see that important concerns raised during the evaluation are being addressed.
 - iv. Evaluate user charge systems in conjunction with plant evaluations to determine the financial condition of the wastewater utility.
- B. Perform periodic O&M inspections of approximately 25 systems annually. Employ practices to support pollution prevention as part of these inspections.
- C. Direct MSU-Northern 104(g) trainer to communities requiring operational assistance following a CPE or inspection, where section staff cannot provide these services.
- D. Promote water conservation through education, facilities planning, and mandates to reduce flows to wastewater facilities. Implement a water conservation pilot program in one (1) community.
- E. Continue implementation of the plant self-assessment process which has been developed for mechanical plants and lagoons. Hold workshops to assist operators in performing self-assessments and to promote pollution prevention concepts.
- F. Educate the public on the subject of pollution prevention through the use of informational materials, public service announcements and conferences.
- G. Implement Upper Missouri River Basin watershed technical studies required under the EPA 104(b)(3) grant, primarily through use of contracted services and other agency resources.

III. WWTP Operator Training

- A. Provide statewide training at regional sites (15-20 speaking engagements) to wastewater professionals on plant operations, management, regulatory requirements, and pollution prevention. Prepare training materials regarding the history and rationale behind water pollution control laws.
- B. Jointly manage the Montana Environmental Training Center (METC) in conjunction with MSU-Northern. Provide direction and support to training coordinator hired for METC activities.

- C. Jointly sponsor the annual water/wastewater operators school with Montana State University including logistical support and speaking at the school. Assist the METC coordinator in the sponsoring of a spring water school designed for small communities.
- D. Support the DEQ's Operator Certification program through writing examinations, grading tests, conducting operator help sessions, evaluating training sessions for certification requirements, and attending advisory board meetings.
- E. Assist operators on-site in response to specific requests for assistance or as follow-up to identified permit compliance problems. Estimate 10 visits annually.
- F. Provide in-house training to staff on plant operations and other technical wastewater topics. Utilize a video camera for this purpose.
- G. In conjunction with the Public Water Supply Program, assist in preparation and distribution of the Big Sky Clearwater.
- H. Obtain training in public speaking and making presentations. Utilize appropriate audio/visual aids. When preparing for presentations, assemble slides and narrative into training modules suitable for use by all staff in making presentations.

IV. Community Education and Assistance

- A. Continue to gain knowledge of the new federal standards and become more familiar with their requirements. Work with communities to help them understand Federal sludge disposal requirements, new State nondegradation regulations and water quality initiatives intended to protect priority watersheds.
- B. Design a generic sludge management plan for communities to follow for beneficial reuse of sewage sludge. Distribute the plan to consultants and communities.
- C. Inventory existing sludge handling methods in Montana communities. Working with the Permits Section, determine which facilities are not in compliance with the regulations. Provide technical assistance to these communities to help achieve compliance with the regulations.

V. Plan, Specification and Project Review

- A. Participate in the DEQ's Deviation Review Committee which considers variances from Circular WQB-2.

- B. Evaluate facilities for compliance with DEQ Nondegradation Rules. Establish 1993 baseline loads and coordinate activities with the Permits Section.
- C. Review project plans and specifications for facilities not funded with construction grants or SRF loan assistance.
- D. Maintain and expand knowledge of current and new technologies through training, references and contact with professionals in the field. In particular, gain insight in the utilization of natural systems for treatment of domestic wastewater.
- E. Assist other governmental agencies in performing a technical review and verification of need of projects seeking financial assistance.

VI. Public Education Program

- A. Prepare a training module on wastewater treatment and present this publicly (i.e., local schools).
- B. Present workshops to educate the public on environmental issues.
- C. Develop or obtain materials to distribute to the public to promote understanding of wastewater treatment.
- D. Interface with MWEA/MSAWWA Public Information Committee regarding their activities.

VII. Integrate Nonpoint Source (NPS) Pollution Control Activities into the SRF Funding Framework

- A. Modify current priority ranking procedures to incorporate statewide water quality improvement goals and include nonpoint source pollution control activities in the ranking procedures. Write narrative of the procedures and circulate to general public and EPA for comments. Modify Intended Use Plan accordingly.
- B. Administer contracted services to establish a framework for prioritizing water pollution control activities associated with watershed-based management. Develop an integration scheme to combine statewide and watershed priorities. Write narrative of the procedures and circulate to general public and EPA for comments. Modify Intended Use Plan accordingly. Develop an enhanced public participation program to obtain more feedback in establishing funding priorities.

Planning Matrix - FFY 97
DEPARTMENT OF ENVIRONMENTAL QUALITY
Planning, Prevention and Assistance Division
Technical and Financial Assistance Bureau (Municipal Wastewater Assistance)

doc: gr\123\matrix97.wk1

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	FTE NEEDED	FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE	PRIORITY

GOAL #1: Administer the Financial Assistance Program.
OBJECTIVE #1: Provide effective program administration.
ACTIVITIES:

A. Conduct admin. duties necessary for prog. maintenance and development, develop and track budgets and contracts, write reports and conduct program planning.	Ongoing	Slovarp Div. Admin.		0.25		\$0 \$16,544	205(g) or SRF	A
B. Supervise, assign duties, fill positions, train, monitor and evaluate staff.	Ongoing	Slovarp Env.Engr.	0.30	0.15 0.07		\$0 \$9,927 \$4,632	205(g) or SRF	A
C. Provide admin. support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.	Ongoing	Reeves Quirino		1.22		\$0 \$80,736	205(g) or SRF	A
D. Promote consistent work methods among section staff.	Ongoing	Slovarp Env.Engr.		0.05 0.05		\$0 \$3,309 \$3,309	205(g) or SRF	A
SUBTOTAL			0.30	1.79	0.00	\$118,457		

OBJECTIVE #2: Construction Grants program management.
ACTIVITIES:

A. Provide projections for outlays and obligations to EPA annually.	06/97	Reeves		0.01		\$0 \$662	205(g)	A
B. Review facility plans for 27 active projects: Belgrade, Box Elder, Bozeman, Columbus, Deer Lodge, Drummond, East Missoula, Eureka, Fairfield, Hamilton, Harlowton, Havre Hot Springs, Judith Gap, L&C Co./ Helena Valley, Lincoln/L&C Co., Polson, Rae, Red Lodge, Roundup, Superior, Sweetgrass, Troy, Valier, Westshore/Lake Co., Whitefish, Wisdom. Provide Advance of Allowance grants for 16 new planning projects: Alberton, Alder, Augusta/L&C Co., Choteau, Culbertson, Eureka, Gallatin Gateway/Gallatin Co., Geraldine, Harrison, Hilger, Joplin, Judith Gap, Lambert, Libby, Nashua, Richey.	Ongoing	Staff	1.00	0.90		\$0 \$59,559	205(g)	A
C. Review designs for 5 grant-funded projects: Deer Lodge, Ronan,	Ongoing	Staff		0.10		\$0 \$6,618	205(g)	A

Hobson, Box Elder, Superior.
Coordinate Nondegradation policy
issues concerning these projects
with Permits Section.

D.	Manage projects currently in construction. Initiate operations at 4 projects: Deer Lodge, Hobson, Box Elder and Ronan.	Ongoing	Staff	0.25	\$0	\$16,544	205(g)	A
E.	Administratively complete 3 projects: Somers, Whitefish Co., and Flathead/Evergreen.	Ongoing	Staff	0.30	\$0	\$19,853	205(g)	B
F.	Obtain positive performance certification from 2 projects: Whitefish Co. and Reedpoint.	Ongoing	Staff	0.01	\$0	\$662	205(g)	B
G.	Complete biannual U.S. EPA Needs Survey.	12/96	Reeves	0.07	\$0	\$4,632	205(g) or SRF	B
H.	Perform periodic M/WBE activities.	Quarter	Reeves	0.02	\$0	\$1,324	205(g) or SRF	B
I.	Implement closeout strategy for the program.	Ongoing	Staff	0.01	\$0	\$662	205(g)	B
SUBTOTAL				1.00	1.67	\$0 \$110,516		

OBJECTIVE #3: Manage State Revolving Fund loan program.
ACTIVITIES:

A.	Provide projections for outlays and obligations to EPA annually.	06/97	Neuwerth	0.01	\$0	\$662	SRF	A
B.	Close up to 9 loans prior to the end of the planning period. Likely borrowers include: Vaughn, Harlowton, Lincoln/L&C Co., St. Marie, Ronan (Ph. II), Cascade, Valier, Townsend, Glasgow. Manage all projects in accordance with operating agreement and program documents developed under the capitalization grants awarded through 10/96.	Ongoing	Staff DNRC Dorsey & Whitney 1st Trust DAD & PJ	1.87	\$0 \$18,000 \$35,000	\$123,751	SRF	A
C.	Provide input to our congressional delegation on adjustments to the SRF program during the reauthorization process currently underway for the Clean Water Act.	As needed	Slovarp	0.05	\$0	\$3,309	SRF	A
D.	Develop SRF program marketing strategy and actively market the SRF program to communities throughout the state. Meet with 10 communities to discuss the program. Obtain feedback from existing borrowers to improve the program and expand utilization. Apply for marketing grant.	Ongoing	Neuwerth Staff	0.10	0.10	\$30,000	\$6,618	SRF A.
E.	Revise SRF application to make	06/97	Neuwerth	0.05	\$0	\$3,309	SRF	A

the document more informational
and user friendly.

F.	Consider a small community program to operate in conjunction with the Montana Board of Investments, including assistance for planning.	03/97	Slovarp Env.Engr.	0.30	0.05 0.05	\$0	\$3,309 \$3,309	SRF	A
G.	Develop and implement the SRF database which is being prepared for program management.	03/97	Neuwerth Quirino	0.20	0.10		\$6,618	SRF	A
H.	Using EPA's model specification inserts, develop these documents to incorporate all federal and state program requirements into one useful package.	03/97	Little Slovarp		0.05	\$0	\$3,309	SRF	A
I.	Make adjustments to the SRF Handbook of Procedures to improve its usefulness and consistency.	Ongoing	Staff	0.10	0.05	\$0	\$3,309	SRF	B
J.	Work with DNRC to develop SRF Handbook of Financial Procedures which includes loan underwriting criteria.	06/97	Neuwerth		0.15	\$0	\$9,927	SRF	B
K.	Complete biannual U.S. EPA Needs Survey	12/96	Reeves		0.07	\$0	\$4,632	SRF	B
L.	Perform periodic M/WBE activities.	Quarter	Reeves		0.02	\$0	\$1,324	SRF	B
M.	Continue to enhance staff knowledge of public finance.	Ongoing	Staff		0.05	\$0	\$3,309	SRF	B
N.	Implement nontraditional uses of SRF funds, in particular, the funding of landfills and storm sewers. Develop administrative rules as needed.	Ongoing	Teegarden Staff	0.20	0.05 0.08	\$0	\$3,309 \$5,294	SRF	B
O.	Develop and implement a new revolving loan program for drinking water projects.			3.00 to 4.00	0.00	\$0	\$0		
	SUBTOTAL			3.90 to 4.90	2.80	\$83,000	\$185,296		

OBJECTIVE #4: Administer small community outreach program.
ACTIVITIES:

A.	Help communities initiate the planning process including use of EPA-funded Advance of Allowance grants.	Ongoing	Staff		0.05	\$0	\$3,309	SRF or 205(g)	A
B.	In conjunction with reauthorization of the Clean Water Act, work with our congressional delegation and other agencies to promote a financial assistance program designed for small, needy communities.	Ongoing	Slovarp		0.01	\$0	\$662	SRF or 205(g)	A

C. Identify small communities with known needs. Contact these towns and offer outreach help which consists of technical and financial assistance. Hold workshops to assist these communities in planning and financing wastewater facilities. Educate administrators in the process of hiring technical consultants.	Ongoing	Staff	0.30	0.05	\$0	\$3,309	SRF or 205(g)	B
D. Consider application of program small projects and streamline the requirements wherever possible.	Ongoing	Staff	0.20	0.05	\$0	\$3,309	SRF	B
SUBTOTAL			0.50	0.16	\$0	\$10,588		

 FINANCIAL ASSISTANCE PROGRAM TOTAL 5.70 t. 6.70 6.42 \$83,000 \$424,856

GOAL #2: Administer the Technical Assistance Program.
 OBJECTIVE #1: Provide effective program administration.
 ACTIVITIES:

A. Conduct administrative duties necessary for program maintenance and development, develop and track budgets and contracts, write reports, and conduct program planning.	Ongoing	Slovarp Div. Admin. Reeves		0.20	\$0	\$13,235	205(g)	A
B. Supervise, assign duties, fill positions, train, monitor and evaluate staff.	Ongoing	Slovarp Env.Engr.	0.30	0.10 0.05	\$0	\$6,618 \$3,309	205(g)	A
C. Provide admin. support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.	Ongoing	Reeves Quirino		0.35	\$0	\$23,162	205(g)	A
D. Through strategic planning, evaluate the technical assistance program to redefine purpose and needs.	Annual	Staff		0.02	\$0	\$1,324	205(g)	A
SUBTOTAL			0.30	0.72	\$0	\$47,647		

OBJECTIVE #2: Administer pollution prevention program.
 ACTIVITIES:

A. Proceed with the MWPP Program consistent with 05/95 grant proposal submitted to EPA. Key elements of the proposal includes: 1) evaluate 5-10 systems annually looking at plant operations, design, administration, and pollution prevention opportunities; 2) identify existing and potential performance-limiting factors, provide report to	Ongoing	Abrahamson Env.Engr.		0.10 0.30	\$5,000	\$6,618 \$19,853	205(g) MWPP	A
--	---------	-------------------------	--	--------------	---------	---------------------	----------------	---

community; 3) work with facility administrators to address performance-limiting factors through O&M training and/or capital improvements; direct municipalities in obtaining needed technical or financial assistance; follow-up on these activities to see that important concerns raised during the evaluation are addressed; 4) evaluate user charge systems in conjunction with plant evaluations to determine the financial condition of the wastewater utility.

B.	Perform periodic O&M inspections of approx. 25 systems annually. Employ practices to support pollution prevention as part of these inspections.	Ongoing	Bahr	0.10	\$0	\$6,618	205(g)	A
			Abrahamson	0.10		\$6,618		
			Env.Engr.	0.10		\$6,618		
C.	Direct MSU-Northern 104(g) trainer to communities requiring operational assistance following a CPE or inspection where section staff cannot provide these services.	Ongoing	Bahr	0.05	\$0	\$3,309	205(g)	B
D.	Promote water conservation through education, facilities planning and mandates to reduce flows to wastewater facilities. Implement a water conservation pilot program in one (1) community.	Ongoing	Staff Engrs. LaVigne	0.02	\$0	\$1,324	205(g)	B
				0.02		\$1,324		
E.	Continue implementation of the plant self-assessment process which has been developed for mechanical plants and lagoons. Hold workshops to assist operators in performing self-assessments and to promote pollution prevention concepts.	Ongoing	Abrahamson	0.10	\$0	\$6,618	205(g)	B
			Bahr	0.05		\$3,309		
F.	Educate the public on the subject of pollution prevention through the use of informational materials, public service announcements and conferences.	Ongoing	Abrahamson	0.02	\$0	\$1,324	MWPP	
G.	Implement Upper Missouri River Basin watershed technical studies required under the EPA 104(b)(3) grant primarily through use of contracted services and other agency resources.		Env.Engr.	0.30	\$90,000	\$19,853	104(b)(3)	
SUBTOTAL				0.00	1.26	\$95,000	\$83,383	

OBJECTIVE 3: Provide WWTP operator training.
ACTIVITIES:

A.	Provide statewide training at regional sites (15-20 speaking engagements) to wastewater professionals on plant operations, management, regulatory requirements and pollution prevention. Prepare training materials regarding the	Ongoing	Staff	0.30	0.50	0.40	\$0	\$26,471	205(g)	A
----	---	---------	-------	------	------	------	-----	----------	--------	---

history and rationale behind water pollution control laws.

B.	Jointly manage the Montana Environmental Training Center (METC) in conjunction with MSU-Northern. Provide direction and support to training coordinator hired for METC activities.	Ongoing	Boyle Slovorp Bahr		0.50	\$0	\$33,089	205(g)	A
					0.05		\$3,309		
					0.09		\$5,956		
C.	Jointly sponsor the annual water/wastewater operators school with MSU-Bozeman including logistical support and speaking at the school. Assist METC coordinator in sponsoring a spring water school designed for small communities.	04/97 09/97	Bahr	0.10	0.05	\$0	\$3,309	205(g)	A
D.	Support the DEQ's Operator Certification program through writing examinations, grading tests, conducting operator help sessions, evaluating training sessions for certification requirements, attending advisory board meetings.	Ongoing	Bahr		0.02		\$1,324	205(g) METC	A
E.	Assist operators on-site in response to specific requests for assistance or as follow-up to identified permit compliance problems. Estimate 10 visits annually.	Ongoing	Bahr	0.30 to	0.50 0.10	\$0	\$6,618	205(g)	B
F.	Provide in-house training to staff on plant operations and other technical wastewater topics. Utilize a video camera for this purpose.	Ongoing	Staff	0.10	0.01	\$0	\$662	205(g)	B
G.	In conjunction with the Public Water Supply program, assist in preparation and distribution of the "Big Sky Clearwater."	02/97 and 08/97	Bahr Reeves Quirino		0.01 0.01 0.02	\$0	\$662 \$662 \$1,324	205(g)	B
H.	Obtain training in public speaking and making presentations. Utilize appropriate audio/visual aids. When preparing for presentations, assemble slides and narrative into training modules suitable for use by all staff in making presentations.	Ongoing	Staff	0.10	0.00	\$0	\$0	205(g)	C
SUBTOTAL				0.90 to	1.30 1.26	\$0	\$83,383		

OBJECTIVE #4: Community education and assistance.
ACTIVITIES:

A.	Continue to gain knowledge of the new federal standards and become more familiar with their requirements. Work with communities to help them understand federal	Ongoing	Staff Env.Engr.		0.05 0.05	\$0	\$3,309 \$3,309	205(g)	A
----	---	---------	--------------------	--	--------------	-----	--------------------	--------	---

sludge disposal requirements, new State nondegradation regulations and water quality initiatives intended to protect priority watersheds.

B.	Design a generic sludge management plan for communities to follow for beneficial reuse of sewage sludge. Distribute the plan to consultants and communities.	08/97	LaVigne Env.Engr.	0.05 0.05	\$0	\$3,309 \$3,309	205 (g)	B
C.	Inventory existing sludge handling methods in Montana communities. Working with Permits Section, determine which facilities are not in compliance with the regulations. Provide technical assistance to these communities to help achieve compliance with the regulations.	Ongoing	Env.Engr.	0.02	\$0	\$1,324	205 (g)	B
SUBTOTAL				0.00	0.22	\$0	\$14,559	

OBJECTIVE #5: Review plans, specifications and projects.
ACTIVITIES:

84	A.	Participate on DEQ's Deviation Review Committee which considers variances from Circular WQB-2.	Ongoing	LaVigne	0.03	\$0	\$1,985	205 (g) or P&S Fees	A
	B.	Evaluate facilities for compliance with DEQ nondegradation rules. Establish 1993 baseline loads and coordinate activities with the Permits Section.	Ongoing	Staff	0.20	\$0	\$13,235	205 (g) Permit Fees	A
	C.	Review project plans and specifications for facilities not funded with construction grants or SRF loan assistance.	Ongoing	Staff Engrs.	0.15	\$0	\$9,927	P&S Fees	B
	D.	Maintain and expand knowledge of current and new technologies through training, references and contact with professionals in the field. In particular, gain insight in the utilization of natural systems for treatment of domestic wastewater	Ongoing	LaVigne	0.05	\$0	\$3,309	SRF	B
	E.	Assist other governmental agencies in performing a technical review and verification of need of projects seeking financial assistance.		Staff Engrs.	0.04	\$0	\$2,647	205 (g)	B
SUBTOTAL				0.00	0.47	\$0	\$31,103		

OBJECTIVE #6: Administer public education program.
ACTIVITIES:

A. Prepare a training module on wastewater treatment and present this publicly (i.e., local schools).	METC	0.00	\$5,000	\$0	MWPP METC 109(b)	B	
B. Present workshops to educate the public on environmental issues.		0.05	0.00	\$1,000	\$0	METC 109(b)	B
C. Develop or obtain materials to distribute to the public to promote understanding of wastewater treatment.		0.15	0.00	\$500	\$0	METC 109(b)	B
D. Interface with MWEA/MSAWWA Public Information Committee regarding their activities.		0.02	0.00	\$0	\$0	?	C
SUBTOTAL		0.22	0.00	\$6,500	\$0		

OBJECTIVE #7: Integrate nonpoint source (NPS) pollution control activities into the SRF funding framework.
ACTIVITIES:

A. Modify current priority ranking procedures to incorporate state-wide water quality improvement goals and include NPS pollution control activities in the ranking procedures. Write narrative of the procedures and circulate to general public and EPA for comments. Modify Intended Use Plan accordingly.	03/97	LaVigne Staff	0.25	\$0	\$15,000	205(g) and SRF	A
B. Administer contracted services to establish a framework for prioritizing water pollution control activities associated with watershed-based management. Develop an integration scheme to combine statewide and watershed priorities. Write narrative of procedures and circulate to general public and EPA for comments. Modify Intended Use Plan accordingly. Develop an enhanced public participation program to obtain more feedback in establishing funding priorities.	06/98	LaVigne Staff	0.2	\$0	\$12,000	104(b)(3) grant	B
SUBTOTAL			0.00	0.45	\$0	\$29,780	

***** TECHNICAL ASSISTANCE PROGRAM TOTAL *****	*****	*****	*****	*****	*****	*****	*****
*****	*****	*****	*****	*****	*****	*****	*****
***** GRAND TOTAL *****	*****	*****	*****	*****	*****	*****	*****
*****	*****	*****	*****	*****	*****	*****	*****

Assumptions: .02 FTE = 40 hrs = 1 week
Staffing = 10.8 FTE's
Cost/FTE = \$66,177

FY97 Program Revenue:

EPA Constr. Grants	\$400,000
WW Treatment - SRF	\$251,654
104(b)(3) grant - SRF Implemen.	\$21,633
104(b)(3) grant - Watershed-NPDES	\$14,428
Poll. Prev. grant	\$27,000

TOTAL	\$714,715
-------	-----------

Funding for contracted services: SRF, 205(g), PP grant, 106 grant, METC 109(b) grant (costs included in average staff cost per FTE).

Priorities are defined as follows:

- A. Absolutely essential to accomplish within the time indicated in order to accomplish mission.
- B. Important, but not essential to mission; could be delayed if necessary.
- C. High priority objectives or activities for which resources are currently not available.

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = == > MTSEA1.97

COMMENTS		ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
		ENFORCEMENT AND COMPLIANCE			8.5			These FTE's are partially funded by operating permit fees.
87	A.	<u>Compliance Monitoring Strategy (CMS):</u>						
	1.	Conduct Level II inspections at all sources targeted for inspection under the State's FY97 CMS plan, at the frequency indicated in the CMS plan.		<u>6/97</u>				State
	2.	Submit to EPA a CMS plan for FY98, pursuant to EPA national guidance on CMS. Source ranking method used for source inspections will be by use of ITM. CMS plan will also address any State-enforceable requirements relevant to Title IV (acid rain) provisions of CAA.		<u>6/97</u>				State
	3.	EPA will perform overview inspections at selected sources listed for inspection in the State's FY97 CMS plan.		<u>6/97</u>				EPA
	B.	<u>Multimedia Inspections:</u> Where appropriate conduct cross-program, multimedia inspections and, as necessary, conduct appropriate cross-program, multimedia enforcement. Where these inspections involve facilities not initially targeted for inspection in the State's FY97 CMS plan, EPA will agree to adjust the CMS inspection list accordingly, such that this cross-program, multimedia initiative will not require additional State resources.		Ongoing				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
C.		<u>Significant Violators:</u>						
	1.	Identify to EPA all violators subject to the current State/EPA Enforcement Agreement (S/EPA EA), upon determination of Violation.		Ongoing				State
∞ ∞	2.	Take appropriate action to resolve violations, in accordance with the S/EPA EA, including tracking of sources subject to compliance schedules.		Ongoing				State
D.		<u>Field Citations:</u> Provide information to EPA on minor violations that might be subject to federal field citations. State and EPA will coordinate on issuance of any field citations. EPA will provide the State with a copy of any EPA-issued field citations, upon issuance.		As required				State/EPA
E.		<u>Compliance/Enforcement Reports:</u>						
	1.	Submit inspection reports to EPA within 60 days of inspection date.		Ongoing				State
	2.	Submit copies to EPA, upon issuance, of all enforcement actions (NOV's, Orders, proposed and final penalty settlements, referrals to State AG) for all sources subject to CMS, and for all NSPS and NESHAP sources.		Ongoing				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
68	F.	<u>Compliance/Enforcement Data Base (AFS) Integrity Management:</u>						
	1.	Provide timely data to AFS on CMS Group I and II sources and any other sources that are major according to 1990 CAAA definition, including general description of each source, compliance and operating status, compliance/enforcement activities (including inspections and enforcement actions), types of criteria pollutants emitted, and identification of federally enforceable continuous emission monitors.		Ongoing				State
	2.	Coordinate with EPA to ensure that FY97 CMS sources are flagged in AFS for inspection, and to ensure that significant violators are correctly identified in AFS.		Ongoing				State
	3.	Perform periodic reviews of AFS data, to ensure required data has been entered correctly.		Ongoing				State
	4.	Perform evaluations of source-submitted summary data reports by reviewing on-site records on a random basis during Level II inspections required by the revised CMS.		Ongoing				State
G.		<u>Continuous Emission Monitoring (CEM) Compliance:</u>						
	1.	Develop and implement Statewide CEM quality assurance (QA) program, which includes the following activities:		Ongoing				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = => MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
a.	Review any required CEM QA project plans and program plans submitted by sources. Provide written summary to EPA of findings and recommendations made on any plans reviewed.		Quarterly				State
b.	Conduct on-site observations and review a representative portion of Performance Specification Tests for CEMs, including test protocols and any concurrent stack tests. Provide written summary to EPA of PST results. Review test protocols.		Quarterly				State
c.	Review any required annual Relative Accuracy Test Audits or CEM recertification. Provide written summary to EPA of audit results and findings on tests.		Quarterly				State
d.	Review a random and representative portion of the source self-audits, whether voluntary or required by State-enforceable source QA plan, permit or SIP regulation. Provide written summary to EPA of findings and the State's impressions of the sources' audits.		Quarterly				State
e.	Review Data Assessment Reports, as may be required by 40 CFR 60 Appendix F, source QA plan, permit or SIP regulation, from significant sources.		Quarterly				State
f.	Review a random and representative portion of the QA information in the source self-monitoring reports (which include EERs and FSA [fuel sampling and analysis] reports) with emphasis on significant sources.		Quarterly				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
2.	Review source self-monitoring compliance reports and excess emission reports (EERs) from CEM sources and take appropriate enforcement action for non-compliers, in accordance with the S/EPA EA.		Quarterly				State
3.	The state will input EER summary data for all federally enforceable CEMs into PCCEMS on a timely basis and provide EPA with the PCCEMS data. As long as AFS provides current plant information, EPA will upload PCCEMS data to AFS and maintain up-to-date data listings of CEMs in AFS.		Ongoing				State
4.	Maintain qualified CEM enforcement staff, by providing for attendance at EPA-sponsored CEM training courses and workshops, if State travel budget allows.		Ongoing				State
5.	In support of EPA development and implementation of the "Compliance Assurance Monitoring Rule" being promulgated under Section 702(b) of the 1990 CAA Amendments, ensure that source self-monitoring programs are effective and consistent with the rule and EPA guidance, upon federal promulgation.		Ongoing				State
6.	Assist EPA in the enforcement of any new CEM requirements pursuant to CAA Title IV (acid rain). Monitor process of installation of any new CEMs and CEM QA activities.		Ongoing				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
H.		<u>Inspector Training:</u>						
	1.	Maintain a qualified inspector force by allowing air inspector attendance at EPA-sponsored training courses and workshops conducted in Region VIII.		Ongoing				State
I.		<u>Stack Tests:</u>						
	1.	As part of the FY97 CMS plan, submit to EPA a written stack test oversight program, to include criteria for prioritizing a list of sources at which the following activities will be conducted: State review of stack test protocols, on-site stack test observations by qualified State staff, and State review of stack test reports for completeness, representativeness and compliance. Include description of State's methodology/protocol/SOP for planning, witnessing and reviewing stack tests.		<u>6/97</u>				State
	2.	Provide quarterly listing of test results.		Quarterly				State
J.		<u>Asbestos NESHAP Compliance:</u>						
	1.	Perform asbestos NESHAP inspections targeting a majority of the jobs done by major contractors and at least one job for a majority of the small contractors. Special emphasis will be given to contractors that have not been inspected before and to complaint response. This commitment includes inspections of regulated asbestos NESHAP projects and landfills which accept asbestos material.		<u>6/97</u>				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = > > > MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
2.	Conduct 30 inspections, following the above stated priorities.		<u>6/97</u>				State
3.	Report information to the National Asbestos Registry System through ACTS, within 30 days of the end of each quarter. Perform appropriate QA/QC on all ACTS data submitted.		Quarterly				State
4.	Submit to EPA, within 30 days of the end of the inspection month, copies of all inspection reports/ checklists), waste shipment discrepancies and exception reports. Identify violators.		Monthly				State
5.	Take appropriate enforcement action for all asbestos violators in accordance with the S/EPA EA. Submit copies of enforcement actions to EPA upon issuance. Update EPA on enforcement status of violators monthly. Implement asbestos T&A guidelines.		Ongoing				State
6.	Respond to citizen complaints and log any requiring inspection or enforcement action into ACTS.		Ongoing				State
7.	Perform public outreach activities as necessary for regulation revisions and enforcement actions.		Ongoing				State
K.	<u>Pollution Prevention:</u>						
1.	Provide P2 training to key compliance staff, pursuant to EPA guidance, focusing on identification of P2 opportunities as part of on-site inspections.		Ongoing				State
2.	Continue to develop outreach programs to advise industry of P2 opportunities.		Ongoing				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
3.		Provide P2 information to EPA for input into EPA's P2 database.		As required				State
L.		<u>National Case Development Initiative:</u> Participate in field investigation, case development and enforcement initiatives with the Regional Office.		As required				State/EPA
M.		<u>MACT Standards:</u> Prepare for implementation and enforcement of standards as they are finalized.		As required				State
N.		<u>Federal Facilities Compliance:</u> Implement a Federal Facilities Compliance Program, pursuant to the EPA Federal Facilities Compliance Strategy.		Ongoing				State
O.		<u>Stratospheric Ozone Compliance Program:</u> Contingent upon EPA funding, negotiate and implement delegation of State enforcement activities to reduce or phase out ozone-depleting compounds, upon federal promulgation. Until State assumes program, forward all CFC complaints and possible violations to EPA.		Ongoing				State
P.		<u>National and Regional Priority Sectors:</u> The OECA FY96/FY97 MOA Guidance identified National Priority Sectors: petroleum refining, primary nonferrous metals and dry cleaners. In addition, the Guidance recommends that the Regions and States give increased attention to other significant sectors. Of the four significant sectors selected by Region VIII staff (agricultural practices, mining, auto		6/97				State/EPA

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
COMMENTS							
95	<p>service/repair shops and coal-fired power plants), the one with significant air emissions is coal-fired power plants. Therefore, we are requesting that you develop and implement a strategy for each of these industry sectors that identifies environmental and/or noncompliance problems which need to be addressed, the enforcement and compliance tools (e.g., compliance assistance, compliance monitoring, incentive and recognition programs, civil and criminal enforcement) that will be applied to the sector, and the outcomes or results which will be measured to assess the effectiveness of the strategy.</p>						
	NEW SOURCE REVIEW			6.5			
A.	<u>Permitting Program:</u> Operate an NSR Permit Program in accordance with PSD and nonattainment area permitting requirements.		Ongoing				State
B.	<u>Permitting Program Reporting:</u> Submit to EPA a copy of the public notice, the technical review and analysis, and the proposed permit or permit conditions, at the start of the public comment period, for the following categories of permit actions:		Ongoing				State
1.	PSD permits for new and modified sources						
2.	Permits for Class A1 new sources						
3.	Permits for Class A1 modified sources (if permitting involves "netting" to avoid major source NSR)						

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = => MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
4.	Permits for sources avoiding major source NSR, by permit restrictions to reduce their potential emissions (synthetic minor)						
5.	Permits for major new and major modified sources in nonattainment areas, as well as any permits issued to implement source-specific provisions of nonattainment area SIPs.						
	The technical review and analysis must include an emission inventory, emission calculations, and a description of the source. A BACT analysis and modeling analysis must be included for the PSD permits. For nonattainment area permits, a LAER analysis and modeling analysis must be included. A RACT analysis must be included for nonattainment area SIP requirements.						
C.	<u>Department Determinations:</u> Submit to EPA copies of Department determinations, including the technical review and analysis, for those categories of permit actions listed in item B. above.		Ongoing				State
	Submit to EPA a copy of any draft Department determinations (including the technical review and analysis) in which pollutant emissions limitations, testing requirements, or operational reporting requirements have been revised from the proposed permit, prior to issuance of the Department determination. The DEQ will respond to all EPA comments.						
D.	<u>Final Permits:</u> Copies of the final permits, for those categories of permit actions listed in item B. above, shall be submitted to EPA, when issued. The DEQ		Ongoing				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY

	will respond to all EPA comments.						
E.	<u>Canada Air Quality Agreement</u> : Submit to EPA a copy of the PSD permit application for those sources located at or within 100 kilometers of the U.S./Canada border per the U.S./Canada Air Quality Agreement. Submit each application within 30 days of receipt.		Ongoing				State
F.	<u>Federal Land Manager Notification</u> : Submit to the Federal Land Managers, a copy of all PSD permit applications and supplemental information, when received, for sources located within 100 kilometers of any Class I areas or causing a significant impact on any Class I areas.		Ongoing				State
G.	<u>NSR Training</u> : Evaluate the need for additional training regarding permitting under the PSD/NSR process to improve permitting activities. EPA will schedule and provide training, as needed.		Ongoing				State
H.	<u>RACT/BACT/LAER Clearinghouse</u> : Submit RACT, BACT, and LAER determinations to the EPA Clearinghouse, Pursuant to CAA Amendments of 1990, Section 108(h).		Ongoing				State
I.	<u>Increment Consumption</u> : Review the SIP to determine that no applicable increments are being violated. If an applicable increment is being violated, notify EPA and work with them to revise the plan to correct the violation. [40 CFR 51.166(a)(4)]		Ongoing				State
J.	<u>State-Mandated Permit Activities</u> : State-required		Ongoing				State

**MONTANA FY97 SEA
AIR PROGRAM
(October 1, 1996 through June 30, 1997)**

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
COMMENTS	<hr/>						
	permitting (non-PSD, attainment area), open burning permits and Montana Environmental Policy Act review.						

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
		SIP DEVELOPMENT			5.5			These FTE's are partially funded by operating permit fees.
A.		PM ₁₀						
	1.	Submit redesignation of nonattainment and unclassifiable areas to attainment, as necessary.		Ongoing				State
		Columbia Falls PM ₁₀		12/96				State
	2.	Provide guidance on PM ₁₀ NSR, redesignation, maintenance, BACM.		Ongoing				EPA
	3.	Provide technical assistance on all aspects of PM ₁₀ SIP development.		Ongoing				EPA
	4.	Implement and track PM ₁₀ nonattainment area SIPs.		Ongoing				State
	5.	Submit PM ₁₀ SIP for Thompson Falls (including provisions for contingency measure and nonattainment NSR).		3/97				State
	6.	Submit PM ₁₀ SIP for Whitefish (including provisions for contingency measures and nonattainment NSR).		6/97				State
B.		Lead:						
	1.	Implement and track the nonattainment lead SIP for East Helena.		Ongoing				State
	2.	Evaluate the lead SIP for East Helena and determine approvability.		6/97				EPA

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
001	C.	SO2						
	1.	Submit East Helena Secondary SO ₂ SIP		6/97				State
	2.	Implement and track the SO ₂ SIP for Billings and Laurel.		Ongoing				State
	3.	Evaluate the SO ₂ SIP for Billings/Laurel and determine approvability.		<u>6/97</u>				EPA
	4.	Implement East Helena primary and secondary SO ₂ SIPs.		Ongoing				State
	D.	NEW SOURCE REVIEW						
	1.	Request authority from the Board of Environmental Review to revise NSR and PSD regulations to add new EPA promulgations and/or correct deficiencies noted in existing regulations. Propose revisions according to schedule specified in the promulgations and/or EPA's letter noting deficiencies.		Ongoing				State
	2.	Develop and propose regulation revisions to address new and modified NESHAPs and NSPS regulations which have been promulgated through 6/30/96.		Ongoing				State
	3.	Request authority from the Board of Environmental Review to adopt rules incorporating existing municipal solid waste landfill and municipal waste combustor NSPS and emission guideline plans.		12/96				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
TOT	E.	<u>CARBON MONOXIDE SIP</u>						
	1.	Continue implementation and enforcement of oxygenated fuels program.		Ongoing				State
	2.	Submit public hearing documentation for the Great Falls 1990 Base Year Emission Inventory.		12/96				State
	3.	Submit final 1993 periodic inventory for Missoula.		6/97				State
	4.	Submit redesignation of nonattainment and unclassifiable areas to attainment, as necessary.						
		- Billings CO		6/97				State
		- Great Falls CO		6/97				State
	5.	Complete the Kalispell carbon monoxide emission inventory.		3/97				State
	6.	Install and begin operation of a second carbon monoxide monitoring site in Kalispell.		10/96				State
	F.	<u>CONFORMITY</u>						
	1.	Assess conformity of projects, TIPs and RTPs for all nonattainment area pollutants.		Ongoing				State
	2.	Develop and submit a general conformity SIP.		6/97				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
MONITORING				4.0			
A.	<u>Network Review:</u> Prepare and submit annual updated Network Review per EPA guidance.		<u>6/97</u>				State EPA will respond within 60 days after receipt of the Network Review.
B.	<u>QA Plan:</u> Review and revise Quality Assurance Project Plan and SOPs and submit report.		<u>6/97</u>				State EPA will respond within 90 days after receipt of QAPP and SOPs.
C.	<u>Monitoring Equipment Plan:</u> Submit updated three year ambient air monitoring equipment plan for FY97, highlighting equipment to be purchased in FY97. Submit report on FY96 equipment purchases.		<u>6/97</u>				State HP-Monitor Replacement (Funds to be determined by Region VIII). Part of Network Review.
D.	<u>Network Operations:</u> Operate ambient air monitoring network consistent with Network Review, QAPP and 40 CFR Part 58.		Ongoing				State
E.	Submit ambient air quality data (including null data codes) monthly within 60 days after the end of the month (SLAMS and SPM).		Monthly				State Although we generally meet the monthly schedule, the Federal Register requires quarterly.
F.	<u>Precision and Accuracy:</u> Submit precision and accuracy data to AIRS-AQS within 90 days after the end of the quarter.		Quarterly				State Due to analysis time, lead precision data will be submitted within 120 days after the end of the quarter.
G.	<u>SLAMS Report:</u> Submit annual (1996) SLAMS report to AIRS-AQS.		<u>6/97</u>				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
H.		<u>Network Modification:</u> Apply for advanced approval of any proposed monitoring network modifications.		Ongoing				State
I.		<u>Training:</u> Attend EPA monitoring workshop.		As scheduled				
J.		<u>NAAQS Exceedances:</u> Notify EPA in writing of any NAAQS exceedances within 45 days of exceedance.		As needed				State
K.		<u>NPAP Audits:</u> Participate in National Performance Audit Program by auditing all category 1 sites as defined by EPA National Exposure Research Laboratory (NERL).		Ongoing				State
L.		<u>Send participants to annual AIRS conference.</u>		As scheduled				State
M.		<u>Review precision and accuracy data and NPAP reports for completeness and compliance with regulations.</u>		Ongoing				EPA
N.		<u>Provide State with guidance on SO₂ and fine particulate network design in support of NAAQS reassessment.</u>		As required				EPA
O.		<u>Special Studies:</u> Submit a sampling and analysis plan for all special studies for review and EPA approval. The studies planned for FY 97 include:	As needed	60 days before implementation of the study				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
1.	Missoula County will design and conduct an air toxics screening study for Missoula.	As needed	6/97				State
2.	Lewis and Clark County will design and conduct a PM ₁₀ saturation study in the Helena Valley.		6/97				State
P.	<u>Industrial Oversight</u> : Conduct performance audits at least once per year on 50% of the industrial monitoring sites which are required by permit or stipulation, and conduct system audits as resources allow.		<u>6/97</u>				State Funded by operating permit fees.
	ACID RAIN			0.5			Funded with Title V permit fees.
A.	<u>Permit Program Development</u>						
1.	Incorporate guidance from EPA on Acid Rain Program Development into State's OPP (Title V)						
2.	Write acid rain permits for affected sources as part of State's OPP (Title V).						
B.	<u>Acid Rain Continuous Emission Monitoring Implementation</u>						
1.	Participate in EPA's team review of certification applications from affected sources. State to provide opinion on approval or disapproval of monitoring system.						

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = == > MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
<hr/>							
2.	Observe recertification tests and audits - a minimum of 50% of the scheduled tests are to be observed.						
	ANNUAL POINT SOURCE EMISSION INVENTORY			3.0			
A.	<u>Annual Emission Inventory:</u> Submit 1996 annual statewide point source emission inventory into AFS to comply with requirements of 40 CFR, Parts 51.325 and 51.326, including past due annual inventories, if any.		<u>6/97</u>				State SEE NOTE
B.	<u>Summary Reports:</u> EPA will provide emission inventory summary report within 30 days after the notification that inventory is completed.		Ongoing				
NOTE: States are required to submit emission inventories into AIRS within a prescribed deadline. To ensure emission inventories are submitted in a timely manner, the state should identify the resources required to complete this activity in 105 grant dollars that will be allocated with each State's emission inventory development and preparation program. The required emission inventories include annual emissions inventories for point sources and area mobile sources as well as SIP O3 and CO nonattainment area inventory data, where applicable, as stated in the CAA and its Amendments. A state could use the grant money to have a contractor prepare the data in order to meet the required deadline. Partially funded with operating permit fees.							
	VISIBILITY			0.0			No resources allocated.
A.	<u>Long Term Strategy:</u> Evaluate and prepare any necessary revisions to long term strategy review.		<u>6/97</u>				EPA

105

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
	AIR TOXICS			2.0			Partially funded with Title V permit fees.
	Environmental Indicator:						
	The total tons of toxics emitted per year.						
	Objective: Reduce the total tons of toxic emissions statewide from 1990 base levels.						
A.	<u>Early Reductions Program:</u> Assist EPA Region VIII in the review of applications for the Early Reduction Program (ERP) pursuant to Title III Section 112(i)(5) of the CAA and the final rule.	As needed					State
B.	<u>Regulation Development:</u> Request authority from the Board of Environmental Review to promulgated MACT rules and standards (at least for Title V sources) in a timely manner and notify EPA of the adoption.	As needed	Date of promulgation plus 12 months				State
C.	<u>Section 112g:</u> Identify major sources subject to section 112(g).	As needed					State
D.	<u>MACT Delegation:</u> Request delegation for all promulgated rules and MACT standards (at least for Title V sources) unless no sources exist in state.	As needed	Date of state adoption plus 30 days				State

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
E.		<u>Section 112(l)</u> : Make requests for section 112(l) approval as appropriate. Communicate with Region VIII to indicate whether section 112(l) applications will be submitted, when, and the nature of the application.	As needed					State
107 F.		Identify sources in the State subject to MACT standards as promulgated.	As needed	Date of proposal plus 60 days				State
	1.	Notify sources subject to a promulgated MACT.	As needed	Date of proposal plus 60 days				State
G.		Collect data for case-by-case data base. Assume responsibility for data entry and adhere to QA/QC protocol and timely updates to data base.	As needed					State
H.		<u>MACT Interim Enforcement</u> : Implement and enforce promulgated MACT standards to the extent state authority will allow until delegation and adoption have occurred.	As needed	Upon MACT promulgation				State
I.		Maintain data base.	As needed					State
J.		Receive and track initial notification forms for MACT standards which have been promulgated by the State.	As needed	Upon MACT promulgation				State

POLLUTION PREVENTION

2.0

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = => MTSEA1.97

	COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
A.		Develop and submit a strategy to integrate P2 into State air regulatory and non-regulatory activities, including:						
108		1. Train staff in P2 applicability to CAA programs and legal guidelines for encouraging P2 implementation at air pollution sources as available.		Ongoing				State
		2. Relocate the Small Business Technical and Environmental Compliance Assistance Program (SBAP) to the Planning, Prevention and Assistance Division's Pollution Prevention Bureau.		Ongoing				State
		3. Conduct outreach to industry on available P2 techniques and options.		Ongoing				State/EPA
		4. Incorporate P2 into regulatory activities such as state MACT standards, VOC BACT, enforcement activities as identified above, Supplemental Environmental Projects (SEPs), permitting, SIPs as identified above, and others.		Ongoing				State

PROGRAM ADMINISTRATION

4.0

MONTANA FY97 SEA AIR PROGRAM (October 1, 1996 through June 30, 1997)

Prepared November 18, 1996, @ 2:42pm
FILENAME = = = > MTSEA1.97

COMMENTS	ACTIVITY/OUTPUT	MILESTONES	DUE DATES	STATE FTE	STATE DOLLARS	EPA DOLLARS	AGENCY
A.	Personnel Management						EPA
B.	Program Administration						State/EPA
C.	Legislative Liaison						State
D.	EPA Liaison						EPA
E.	County Program Oversight						State
F.	Training						State/EPA
G.	Program Resource Improvement Strategy						State/EPA
H.	Legal Support						
	TOTALS					\$812,212	

Total dollars are best estimates based upon legislative authorizations and estimated 105 Grant. State dollars are subject to change through executive and legislative actions and federal dollars may also fluctuate.

* Carried over from last year's SEA

MONTANA RCRA HAZARDOUS WASTE PROGRAM NARRATIVE FOR FISCAL YEAR 1997

INTRODUCTION

This narrative and the attached tables make up the RCRA Subtitle C Hazardous Waste Program portion of the Annual State-EPA Agreement (SEA) for the DEQ. The SEA addresses all major elements of the state program.

FY 97 will continue to be a transition year for DEQ moving the RCRA-C Program from an emphasis on performing and measuring activities (e.g., number of permits processed, number of enforcement actions taken) to an emphasis on environmental results (e.g., number of corrective action sites with environmental pathways controlled).

The FY 97 SEA is composed of two parts as in the past: a narrative and a work plan. The narrative describes DEQ activities in areas that EPA has identified as a high priority for all programs which EPA supports through grants. These priority areas are: 1) environmental indicators and measures; 2) Common Sense Initiative; 3) community based programs and; 4) small businesses/community initiatives. The narrative is specific to RCRA and describes DEQ's plans for each of these subjects. In addition, the narrative addresses what DEQ is doing to maintain a strong core program in accord with the Authorization Agreements with EPA.

PART 1: NARRATIVE FOR INITIATIVES AND CORE PROGRAM

A. EPA/State Initiatives

1. Environmental Indicators/Measures

To address the Environmental Indicators Initiative, DEQ will continue to use the corrective action measures which are a part of the SEA work plan table. The mechanism used to measure this program activity is RCRIS data. DEQ will also continue to develop and define additional environmental indicators so that baseline data for future comparison can be developed. In addition, DEQ will continue to evaluate and where appropriate define other environmental measures for the non-permitted universe of handlers.

During FY 96, DEQ defined certain quantitative measurements which may be useful in evaluating overall environmental quality and the relative success of maintaining the quality of the environment. The indicators defined are: total hazardous waste generated; recurring versus one time hazardous waste generated; hazardous waste generated by generator classification; recurring hazardous waste by waste code; and hazardous waste diverted from land disposal. During FY 97, these potential indicators will be evaluated to determine their usefulness in measuring environmental quality.

2. EPA's Enforcement and Compliance Initiative

The U.S. EPA Office of Enforcement and Compliance Assurance (OECA) has identified the following industrial sectors for implementation of an enforcement and compliance initiative: metal mining and nonferrous metals; coal fired power plants; agricultural practices; automotive services; petroleum refining; and dry cleaning. The goal of the initiative is to identify areas of noncompliance within each sector, and promote a high compliance rate through traditional enforcement and an aggressive outreach program. The DEQ will implement the comprehensive evaluation component of this initiative. Specific activities for this initiative may be found in the attached "EPA's Enforcement and Compliance Assurance Work Plan."

In FY96, DEQ selected certain industrial sectors and focus areas which were applied to the state's hazardous waste "common sense" initiative. The four areas selected were: petroleum refining waste; wastes sent to combustion; waste solvents and non-ferrous smelting waste. DEQ intends to maintain these sectors/focus areas for scheduling compliance monitoring activities for two main reasons. First, these sectors/areas appear to be amenable for expanded pollution prevention activities; and secondly, these sectors/areas overlap the sectors identified in EPA's Enforcement and Compliance Initiative.

3. Community Based Efforts

In FY 97, DEQ will develop and implement the Billings Metropolitan Geographic Initiative. This community based initiative will focus on identifying the level of compliance with hazardous waste management regulations in the Billings area. The initiative will consist principally of increased inspections of non-notifiers to determine if there is a disproportionate level of non-compliance in this geographical region. If determined appropriate, the DEQ will initiate community outreach activities with an emphasis on the use of mass media to provide compliance assistance.

4. Small Business/Community Initiatives

DEQ will continue to employ traditional outreach activities to enhance compliance by the regulated community. These activities include:

- *Ongoing response to requests for clarification of regulatory requirements;
- *Participation in seminars and workshops sponsored by such organizations as the DEQ Small Business Assistance Program, trade associations, and the Montana Pollution Prevention program;
- *Revision of the manual titled "The Small Business Handbook for Managing Hazardous Waste" and offering the publication to interested parties on an ongoing basis.

During FY96, DEQ initiated formal contact with the three largest chemical distributors in the state and two major hazardous waste service firms. It was found that all of these private firms

are proactive in providing technical and general compliance assistance to their customers. The firms distribute program publications and refer clients to the DEQ for compliance assistance on a routine basis. For FY 97, DEQ will continue to maintain lines of communication with these private firms. In addition, publications produced or acquired will be offered to these firms who then may distribute the material to their customers.

A bibliography of publications pertaining to waste minimization and pollution prevention has been developed. That bibliography has been provided to all large generators and facilities. During FY 97, as new publications dealing with waste minimization and pollution prevention are placed in DEQ's library, the bibliography will be updated. If significant addition are made to the library, the regulated community will be advised of the additions.

B. Core Program

1. RIPFLEX

In FY 97, DEQ expects to continue to shift some of its resources to corrective action activities. This shift will coincide with state authorization for this program element and the final issuance of pending post-closure permits.

2. Program Management

The total resources for implementation of hazardous waste waste management provisions are distributed over nine program element areas. As illustrated in the attached budget summary table, 13 percent of total resources (in terms of both FTE and budget) are allocated for program management. Approximately 15 percent of resources are allotted for data management. Post-closure and operating permit activities will expend about 17 percent of resources and corrective action activities will use an additional 17 percent. About 17 percent of resources are budgeted for compliance monitoring. About 11 percent of resources have been apportioned for enforcement activities. Approximately 2 percent of resources have been designated for waste minimization. State authorization has been allotted 7 percent of the budget.

DEQ and EPA will revise the Enforcement Agreement (EA) and Memorandum of Agreement (MOA), if necessary. Proposed MOA revisions in FY 97 will include a transition strategy for the transfer of the lead in corrective action activities.

DEQ and EPA agree to submit, at a minimum, those management reports included in the program SEA table (i.e., mid and end of year written reports, with conference calls and status checks as needed or appropriate).

3. Data Management (RCRIS)

DEQ is committed to the use and maintenance of RCRIS as the hazardous waste management planning and reporting mechanism. DEQ prefers to address the upcoming RCRIS upgrades with direct assistance from Region VIII personnel. DEQ will continue to develop and implement procedures to ensure timely and consistent entry of data to the national data base. Recent changes in the RCRIS program have led to some difficulties in both data input and extraction. DEQ personnel have relied primarily on telephone support for the resolution of RCRIS problems, but require more opportunities to work in person with Region VIII on more specialized report generation and technical understanding of the entered data.

4. Closure, Post-Closure

DEQ will participate in a joint State-EPA long-term strategy on Closure and Post-Closure, with a focus on priority activities. DEQ has identified no new or remaining hazardous waste management units that require closure. Closure plans for units already in the hazardous waste management system have been called in and approved.

Post-closure permit authority will most likely be used to address the remaining management units requiring post-closure care (all other units in post-closure care have received permits). DEQ considers all post-closure facilities to be high priority and will continue to address the remaining post-closure facilities. Issuance of these post-closure permits would allow the allocation of resources to operating permits, compliance monitoring and corrective action.

Historically, many permit modifications for operating and post-closure permits have been requested within a fiscal year. Such modification requests have required considerable effort to process and may detract considerable amounts of resources from post-closure permit issuance. DEQ will issue two major permit modification to two post closure permits in FY 97.

5. Operating Permits

DEQ will participate in joint State-EPA long-term strategy for operating permits, with a focus on high priority activities. There are no remaining Part B applications that have yet to be called in. There are no pending operating permit appeals or modification requests. DEQ has begun preparations and discussions with Montana State University, Exxon, Conoco and Burlington Northern-Paradise about re-issuance of their permits in 1998.

6. Corrective Action

DEQ is presently not authorized for the lead in facility wide corrective action. Authorization is anticipated in the first quarter of FY 97. To help demonstrate capability, DEQ continues to assist the EPA Montana Office in the review of documents associated with corrective action. The Montana corrective action universe of facilities actively engaged in site investigation or cleanup is comprised of four petroleum refineries, an air force base, a pesticide formulator and a former wood preserving site. A fourth petroleum refinery permit is currently under appeal.

Prioritization of corrective action is through the use of NCAPS and the annotated facility management plan. All high priority sites are being addressed by EPA or State authority.

If DEQ is authorized for corrective action in FY 97, it is anticipated that considerable work sharing with EPA on corrective action sites will occur. As clarified in the MOA, it is expected that the EPA Montana Office will retain the lead for those facilities already issued HSWA permits or 3008(h) order and DEQ will assume the lead for these facilities after significant milestones (i.e., after interim measures are implemented or RFI investigations are completed). DEQ will have the lead on any new facilities issued permits under HSWA authority after corrective action authorization.

EPA approaches corrective action oversight in a tiered fashion in Montana. Facilities receive intensive oversight during the development of work plans, reports, selection of risk assessment assumptions and the selection of interim measures or corrective measures. Less intensive oversight is used during data collection and analysis due to limited EPA resources. DEQ will approach corrective action oversight in the same fashion.

All sites requiring stabilization have been evaluated and the interim ground water control mechanism for the Cenex refinery will be selected by the end of FY 97. The Conoco Refinery interim measure has been in operation for over a year. EPA has required facilities with off-site releases to evaluate the need for interim measures upon initiation of RFI activities.

7. Compliance Monitoring

Because compliance with permit conditions is considered to be essential in protecting public health and environmental resources, DEQ will conduct at least one compliance evaluation inspection at each permitted TSDF. The results of those inspections will be used to determine if additional inspections are warranted.

Other handlers will be selected for compliance evaluation inspections based upon a handler's compliance history, knowledge of the waste streams generated, an evaluation of a handler's environmental setting, and the length of time that has transpired from the last inspection.

For handlers who have notified of their waste management activities, an evaluation of annual reports, past inspection reports, RCRIS data, and information from notification forms will assist in selecting inspection candidates. Generators who have a history of serious violations or a large number of violations are candidates for inspection. Generators who produce large quantities of waste or who produce a waste that offers a high risk of environmental or public health damage if mismanaged are also inspection candidates. Generators who are not served by public utilities or who are otherwise located in environmentally sensitive areas may be considered for inspection. Handlers who have not been inspected in the last three years are also inspection candidates, especially if they meet any of the aforementioned criteria.

Non-notifier candidates are selected by the applying knowledge of hazardous waste generation that is typical for the industry, by evaluating a handler's physical setting as it relates to

sensitive environmental resources and waste management challenges, considering the size of the business, and considering any allegations of improper waste management received by the program.

DEQ is committed to providing compliance assistance to the regulated community at every possible opportunity. Compliance assistance will be provided during inspections, during workshops or other outreach efforts, and during daily communication with affected handlers. Development, maintenance and distribution of compliance assistance materials will continue to be a priority for the program.

The implementation of an established inspection plan could be affected by a reallocation or reduction in staff resources. In such a case, priority will be placed in selecting inspection candidates that offer the greatest potential to adversely affect public health or the environment.

8. Enforcement

DEQ uses RCRIS to project and track enforcement actions.

A revised Cooperative Enforcement Agreement has been drafted which incorporates the provisions of Enforcement Response Policy. DEQ will consider the provisions of the revised Supplemental Environmental Projects Policy, the Small Business Policy and the Small Community Policy in enforcement actions where applicable and appropriate.

9. State Authorization

DEQ will submit the draft RCRA 4 and 5 authorization revision applications during FY 97. Alternatively, DEQ may submit a draft comprehensive authorization package consisting of the HSWA 2 through RCRA 6 clusters in FY 97. No format or substantive changes in the MOA or other instruments, other than the aforementioned corrective action transition strategy, have been identified. Should such changes be identified, they will be addressed.

Authorization for Non HSWA 5 and HSWA 1 clusters is anticipated in the first quarter of FY 97.

10. EPA's Role/State Oversight

DEQ will accommodate EPA's evaluation of the state's closure/post-closure, permit and corrective action programs by sharing the program's work products with the EPA prior to final decision. DEQ will take comments received from these evaluations under advisement. DEQ will provide copies of all formal enforcement actions to EPA at the time when the action is taken against the owner/operator.

DEQ has continued to identify training and technical assistance as areas where assistance from EPA is needed. Training is needed in vital areas such as RCRIS management, risk assessment and remediation technology selection.

PART 2: WORK PLAN AND BUDGET TABLES

Attached are the tables which summarize DEQ's work plan and budget.

Attachment 1

**FY 1997 HAZARDOUS WASTE PROGRAM
WORK PLAN FOR MONTANA DEQ**

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
I. PROGRAM MANAGEMENT					
A. Revise State-EPA Enforcement Agreement, if necessary (list changes which will be made)		S/Vidrine	4		
II. AUTHORIZATION OF STATE PROGRAMS					
A. List of planned authorization submittals (cluster and quarter) Draft RCRA 4 Draft RCRA 5 Draft RCRA 6 B. Publish Federal Register Notice of Decision(s) -- list notices and quarter targeted for publication Non HSWA 5 HSWA 1 C. Revise MOA as necessary - HSWA 1 cluster		S/Hall S/Hall S/Hall E/Finke E/Finke S/Hall	1 1 4 1 3 1		

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
III. OVERSIGHT OF STATE PROGRAMS (EPA lead)					
A. Monitor State Performance (identify only those options that apply)					
1. Conduct FY 96 End-of-Year Review		E/Finke		1	
2. Conduct FY 97 Mid-Year Review		E/Finke		3	
3. State Submittals (status reports, etc.)					
4. Indicate if the RCRIS reports should be substituted for #1, #2, or #3 above (circle one)					

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
IV. CLOSURE AND POST CLOSURE					
A. Closure Plan Approvals (list facility name, ID#, and units)					CL360 None pending
B. Closure Certifications (facilities certifying that closure activities were completed under approved closure plan - list facility name and ID#)					CL370 None pending
C. Closure Verifications (determinations by the authorized agency that the approved closure plan has been completed - list facility name and ID#)					CL380 None pending
D. Final Post-Closure Permit Determination/Issuance (list facility name, ID#, and units)	Conoco Refinery MTD006229405	S/Holmes	1		PC200 Extension of FY 96 Commitment.
	Flying J Refinery MTD002076370	S/Heckengerger	2		PC200
	Montana Refining Co. MTD000475194	S/Heckenberger	1		PC200

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
OPERATING PERMITS					
A. Permit Final Determination (issuance/denials -- list facility name, ID#, and units, if applicable)					OP200 None pending
B. Permit Modification Activities (list/report majors mods only)	BN Paradise MTD000716787	S/Phillips	2		OP240 Approve CAMU
	BN Somers MTD053038386	S/Holmes	3		OP240 Shorten PC period
C. Five-Year, Ten-Year Permit Reviews and Renewal Determinations (list high priority sites only)					OP200 None

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
D. Miscellaneous Activities (e.g., combustion, no migration petitions, emergency permits, waivers, etc.) --					None pending
VI. CORRECTIVE ACTION					
A. Assessments - RFAs, PA+s (list facility name, ID#, and activity)					CA050 None pending
B. NCAPS Rankings Completed (list all sites that have not been ranked and indicate quarter and year that ranking will be done)					CA075 All completed

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
C. Stage I (RFI) activities (list facility name, ID#, and activity)	Flying J Refinery MTD002076370 RFI WP Approval	E/Zazzall (Heckenberger)	4		
	Montana Refining Co. MTD000475194 RFI WP Approval	E/Wallace (Heckenberger)	4		MRC schedule subject to change if permit appealed
	Transbas MTD079711198 RFI Rpt Approval	S/Phillips (Zazzali)	3		CA200
	Malmstrom AFB MT8571924556 RFI Phase II Rpt Approval	E/Zazzall (Heckenberger)	2		CA200
			4		CA200
	Exxon Billings Refinery MTD010380574 RFI Phase II Report Approval	E/Wallace (Holmes)	2		CA200
	Conoco Billings Refinery MTD006229405 RFI Rpt Approval	E/Wallace (Holmes)	3		CA200
	Cenex Laurel Refinery MTD006238083 RFI Phase II Rpt Approval	E/Zazzali (Holmes)			

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
D. Stage II (CMS) activities (list facility name, ID#, activity)	BN Paradise MTD000716787 CMS WP Approval	E/Wallace (Phillips)	2		
	Malmstrom Air Force Base MT8571924556 CMS Report Approval	E/Zazzali (Heckenberger)	3		
		E/Wallace (Holmes)	4		
	Conoco Billings Refinery MTD006229405 CMS Workplan Approval	E/Wallace (Phillips)	4		
	BN Paradise MTD000716787 CMS Report Approval				
E. Stage III (CMI) activities (list facility name, ID#, activity)	Malmstrom AFB MT8571924556 CMI Implemented, initial	E/Zazzali (Heckenberger)	1		CA550 PCB and Wherry Housing SWMUs
	Malmstrom AFB MT8571924556 CMI Implemented, subsequent	E/Zazzali (Heckenberger)	4		CA550 (subsequent) Remaining SWMUs

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
F. TSDFs evaluated for Stabilization (list only sites still needing an evaluation and indicate when they will be evaluated)					CA225 None
G. TSDFs with stabilization/interim measures implemented (list facility name, ID#, measures, and mechanism)					CA650 None

Activity	Facility, ID# (if applicable)	Lead Agency/ Project Manager	Quarter		Comment
			sched	Actual	
H. Environmental Indicators of Corrective Action Results 1. Determinations of Current Human Exposures Under Control (list facility name, and ID#) 2. Determinations of Ground Water Releases Under Control (list facility name and ID#)	Conoco Billings Refinery MTD006229405 IM Implementation	Wallace / Holmes	1		CA725 None pending CA750

VII. COMPLIANCE MONITORING
A. Inspections of Treatment, Storage and Disposal Facilities:

Priority	Incinerators		BIFS		LDFS		TSFs		Gen		FF		Trans.		Non-Notifier		Total	
	T	A	T	A	T	A	T	A	T	A	T	A	T	A	T	A	T	A
Community-Based: Billings Metro Geographic Initiative															12			
Sectors (list sectors)																		
Petroleum Refineries									2									
Combustibles (Mines, Heavy Equipment Repair)									2		1							
Waste Solvents (Dry Cleaners, Auto Repair)									1				1		5			
Non-Ferrous Smelters									1									
Other Priorities					2		1											

B. EPA Oversight Inspections - list facility name and ID#

Three inspections. Names and dates to be determined after receipt of State inspection plan.

Activity	Facility, ID#	Action Taken	Quarter
VIII. ENFORCEMENT			
A. Formal Administrative Enforcement Actions (report only) (list each facility and action taken)		As needed.	
B. Formal Judicial Enforcement Actions - referrals to State Attorney General (report only) (list facility and action taken)		As needed.	
C. Compliance Assistance/Outreach -- specify projects, sectors, programs Leverage the Role of the Private Sector Integrate Pollution Prevention into all Program Activities		See narrative See narrative	on- going on- going

Activity	Facility, ID#	Action Taken	Quarter
<p>IX. Building State Capability, Technical Assistance, Training (list specific activities, projects, etc. below)</p> <p>Risk Assessment</p> <p>RFI/CMS Training</p> <p>Remedial Technology Selection</p> <p>RCRIS Training</p> <p>Subpart CC Training</p> <p>LDR Training</p> <p>Community Involvement Training for corrective action</p>			

FISCAL YEAR 1997 (10/1/96-6/30/97)
UNDERGROUND STORAGE TANK PROGRAM WORK PLAN

Note: This workplan covers 3 quarters to accommodate a switch from the Federal to the State fiscal year. The first quarter activities in the workplan below were completed under the 4th quarter of Federal fiscal year 1996.

Activity/Output Underground Storage Tanks	Quarterly Milestones				Work years		Dollars		Responsible Agency
	1	2	3	4	State	EPA	State	EPA	
I. UST Program Development and Implementation									
A. Implement UST operation and management rules.	Ongoing				.1				DEQ
B. Implement program for UST installer permits. Permits are required whenever an UST is installed, modified, repaired, or closed.	Ongoing				.1				DEQ
C. Implement UST installer/inspector licensing program.	Ongoing				.07				DEQ
D. Maintain State funding mechanism. 1. Evaluate self-funding options; brief report.	Ongoing Draft			Final	.05				DEQ
E. Apply for FY 98 UST assistance. Negotiate FY 98 UST SEA workplan.				6/97	.05	.03			DEQ
F. Update UST notification data base.	Ongoing				.2				DEQ
G. Provide timely compliance assistance (pamphlets and other information) to O/O for release detection, financial responsibility, and 1998 upgrade requirements. 1. Outline 1998 deadline strategy/approach; brief report.	Ongoing or as needed and requested Draft Final				.2				DEQ
H. Obtain technical assistance/training for LGUs, Tribal, and state staff.	As required				.05	.01			DEQ/EPA
I. Provide technical assistance/training to local and Tribal program implementation staff.	Ongoing				.1	.01			DEQ/EPA

Activity/Output Underground Storage Tanks	Quarterly Milestones				Work years		Dollars		Responsible Agency
	1	2	3	4	State	EPA	State	EPA	
J. Exchange RCRA regulated UST facility information for Indian Reservations in an effort to keep DEQ and EPA data bases current.	Ongoing				.08	.02			DEQ/EPA
K. Report quarterly (STARS) on 10th day following mid-year and end-of-year.	Ongoing				.1				DEQ
L. Work with EPA on transfer of data from UST/DMS to replacement data base. 1. Work with EPA to develop communications link to share database information.	As needed				.25	.03			DEQ/EPA
II. Compliance, Monitoring and Enforcement									
A. Identify, document, investigate and attempt to resolve violations of state and federal rules with emphasis on leak detection violations.	As required				.25				DEQ
B. Develop and maintain an enforcement tracking system that incorporates a prioritization of enforcement cases, and tracks all violations from discovery to resolution.		1	1	1	.2				DEQ
C. Meet monthly to discuss enforcement cases with EPA, assess progress, consider enforcement alternatives, and refer cases to EPA as appropriate.					.05	.02			DEQ/EPA
D. Notify EPA of all violations of federal regulations involving USTs on Indian Reservations within 10 days of discovery by MDHES.					.05				DEQ/EPA
E. Advise and educate regulated community regarding compliance alternatives.		2	2	2	.15				DEQ

Activity/Output	Quarterly Milestones				Work years		Dollars		Responsible Agency
	1	2	3	4	State	EPA	State	EPA	
Underground Storage Tanks									
F. Conduct UST compliance inspections 1. Develop and implement an inspection and self-certification plan designed to assure that each operating UST facility has been assessed for compliance at least once every 5 years. 2. Issue press releases of inspection results to assure regulated community is aware of enforcement presence. 3. Emphasize 1998 upgrade requirements during each inspection. Provide outreach materials on 1998 upgrade requirements.		15 2	15 2	15 2	.4				DEQ
G. Conduct joint UST compliance inspections with EPA emphasizing leak detection enforcement.				10	.1	.02			DEQ/EPA
H. Develop and implement administrative penalties program (field citations).					.4				DEQ
I. Encourage State/EPA coordinated planning and decision making regarding potential and actual multimedia enforcement cases (Focus on Federal facilities).	As appropriate				.05				DEQ/EPA
III. Oversight									
A. Advise/assist with UST Program Development.	Ongoing					.01			EPA
B. Refer inquiries, complaints to State.	As needed					.01			EPA
C. Assist State with implementation of State Program.	As needed					.01			EPA
D. Assist State with leak detection compliance monitoring enforcement efforts, and 1998 upgrade requirements.	As needed					.01			EPA
E. Provide training/secure training opportunities for State staff.	As needed					.01			EPA
Total					3.00	0.19	\$40,625	\$121,875	

FISCAL YEAR 1997 (10/1/96-6/30/97)
LEAKING UNDERGROUND STORAGE TANK PROGRAM WORK PLAN

Note: This workplan covers 3 quarters to accommodate a switch from the Federal to the State fiscal year. The first quarter activities in the workplan below were completed under the 4th quarter of Federal fiscal year 1996.

Activity/Output LEAKING UNDERGROUND STORAGE TANKS TRUST FUND	Quarterly Milestones				Work years		Dollars		Responsible Agency
	1	2	3	4	State	EPA	State	EPA	
I. LUST Trust Fund Implementation									
A. Submit FY 98 LUST Cooperative Agreement application. Negotiate FY 98 LUST Cooperative Agreement workplan.				9/96	.1	.02			MDEQ/EPA
B. Provide training/technical assistance for regulated community, affected industry, LGU's, and Tribes in corrective action procedures.					.1	.02			MDEQ/EPA
C. Maintain corrective action status tracking system in UST/DMS, and in UST Access.	Ongoing				.6				MDEQ
D. Implement the following core elements of corrective actions:									
1. Conduct site investigations.	As appropriate				.25				MDEQ
2. Direct and manage LUST Trust contractors.	Ongoing				.75				
3. Conduct corrective action plan review.	Ongoing				.75	.02			MDEQ
4. Initiate cost recovery actions.	As appropriate				.75				MDEQ
E. Report quarterly (STARS) on 10th day following mid-year and end-of-year.		1		1	.1				MDEQ
F. Conduct corrective action streamlining efforts.	Ongoing				.1				MDEQ
G. Promote alternative remediation technologies.	Ongoing				.1	.02			MDEQ/EPA
H. Exchange RCRA regulated LUST facility information as requested in an effort to keep MDEQ and EPA data bases current.	Ongoing				.1	.02			MDEQ/EPA

Activity/Output	Quarterly Milestones				Work years		Dollars		Responsible Agency
	1	2	3	4	State	EPA	State	EPA	
LEAKING UNDERGROUND STORAGE TANKS TRUST FUND									
1. Notify MDEQ/EPA of all RCRA regulated LUSTs on Indian Reservations within 10 days of discovery. Provide corrective action status of LUST facilities upon request.	Ongoing				.05	.02			MDEQ/EPA
I. Work with EPA on transfer of data from UST/DMS to UST Access.	As needed				.05	.02			MDEQ/EPA
J. Develop a RBCA or RBCA alternative approach for setting site-specific cleanup goals. 1. Establish workgroup to meet on a regular basis. 2. Draft plan with workgroup assistance.					.2				
II. Oversight									
A. Conduct joint LUST Trust site investigations.						.02			EPA
B. Provide technical assistance.						.02			EPA
C. Provide training.						.01			EPA
Total					4.00	0.19	\$26,498	\$688,482	