

This workplan includes the work of the following divisions:

Office of Waste Management, Office of Technical and Customer Assistance, Office of Compliance and Inspection, Emergency Response

## Cross-Goal Strategies

<b>Objective: Expand and improve partnerships</b>	
<b>Indicators</b>	
<b>Key Strategies</b>	<b>Performance Measures</b>
EPA	<ul style="list-style-type: none"> <li>• Continue to keep open communications with EPA state enforcement representatives in Air, Water and Waste.</li> <li>• Participate in regular meetings on media related enforcement matters. As requested, assist EPA in understanding state related enforcement efforts.</li> <li>• EPA is supported in joint enforcement inspection efforts or formal enforcement related activities.</li> </ul>
Participate in interstate organizations to improve programs.	<ul style="list-style-type: none"> <li>• Participate in the Northeast Environmental Enforcement Project as part of its steering committee. Assist NEEP with its continuing efforts to train state enforcement staff. Provide informational assistance to NEEP and participating states. Support NEEP efforts by paying state participation dues on time.</li> <li>• Continued participation in inter-state groups such as NEWMOA, NEIWPC and ASTSWMO.</li> </ul>
Emergency Response.	<ul style="list-style-type: none"> <li>• Participate in Regional Response Team (RRT) meetings.</li> <li>• MOU with Fire Marshall's Office for response to white powder incidents.</li> <li>• Contracts (PRFAs) with EPA and USCG to provide project specific emergency response capabilities.</li> </ul>

<b>Objective: Financial Sustainability</b>	
<b>Indicators</b>	
<b>Key Strategies</b>	<b>Performance Measures</b>
Ensure that penalties are collected.	<ul style="list-style-type: none"> <li>• Continue efforts to have a collection agent manage collection of outstanding penalties</li> <li>• Coordinate with the Office of Management Services for referral and tracking of Respondents that owe the RIDEM penalties and cost recovery that must be collected.</li> <li>• Track all outstanding formal enforcement actions, consent agreements and superior court orders involving penalty assessments and payment deadlines</li> </ul>
Pursue Grants.	<ul style="list-style-type: none"> <li>• Acquisition of FY04 DOJ Homeland Security Equipment Grant.</li> </ul>
Pursue Cost Recovery.	<ul style="list-style-type: none"> <li>• Document Emergency Response Activities that are Cost Recoverable.</li> <li>• Obtain PRFAs from EPA/USCG to cover specific project response costs</li> <li>• Submit claims to NPFC as needed</li> </ul>

## Cross-Goal Strategies

Objective: Public participation and outreach	
Indicators	
Key Strategies	Performance Measures
Further development of WEB sites.	Complete updates and conversion of Brownfield WEB site.
Complete Emergency Response Web site.	Have ER web site online FY04

Objective: Information Management	
Indicators	
Key Strategies	Performance Measures
Desktop Upgrades	<ul style="list-style-type: none"> <li>• By 6/04, replace all remaining outdated Window 95 computers with new hardware/software that supports Windows 2000. Ensure upgrades are compatible with other hardware /software packages purchased and used by other DEM regulatory divisions. Total number of computers estimated at 28. Total cost estimated at \$37,000.00.</li> <li>• By 6/04, ensure that computer access to permit databases maintained by DEM media programs are available to enforcement staff for monitoring and sharing of information.</li> </ul>
One Stop Grant Implementation	<ul style="list-style-type: none"> <li>• By 7/03, OC&amp;I will develop a new complaint tracking database to assist in determining complaint numbers, open cases, response times, case closure and enforcement actions in response to complaints. The database will be available to assist other divisions on the status of complaints and investigations.</li> <li>• By 12/03, OC&amp;I will finalize a tracking database for formal administrative enforcement cases and legal civil cases including components to assist in tracking performance and penalty collection. The database should be accessible by other divisions to assist communication efforts on enforcement matters.</li> </ul>

## Enforcement and Compliance Assistance

Objective: Monitor Regulatory Compliance through inspections	
Indicators	
Key Strategies	Performance Measures
<p>Target sectors or facilities for compliance inspections (OWM)</p>	<ul style="list-style-type: none"> <li>• Number of permitted transporters inspected (Target 10 / yr)</li> <li>• Number of TSDF inspections completed (Target 2 full inspections annually)</li> <li>• Number of SW &amp; MW inspections completed (Target 100 per year)</li> <li>• Number of baseline compliance inspections for UST ERP (approximately 40 needed)</li> <li>• Number of random follow-up inspections 1 year after UST ERP begins (approximately 40 needed)</li> <li>• Number of follow-up target inspections conducted as result of UST compliance certification forms received</li> <li>• Total number of UST compliance inspections conducted.</li> </ul>
<p>Target sectors or facilities for compliance inspections.</p> <p>According to national enforcement policy, implementers of programs to enforce the Clean Air Act, the Clean Water Act, the Safe Drinking Water Act, and the Resource Conservation and Recovery Act are required to identify and address significant noncompliers (also called significant violators) to minimize or eliminate risk to human health and the environment. To this end, to the extent that resources and laws allow, the state commits to (1) undertake targeting strategies and inspection protocols designed to identify significant noncompliance, and (2) identify detected significant noncompliers and continue to submit data for national enforcement databases maintained by EPA. (See also Objective Deter regulatory non-compliance thru enforcement for enforcement related Strategies)</p>	<ul style="list-style-type: none"> <li>• RCRA hazardous waste generators – In FY2004 and FY2005, 25 large quantity generators of federally regulated hazardous waste are inspected annually. (25 LQGs represents 25% of universe).</li> <li>• <u>OC&amp;I RCRA/Water Pollution</u> – for FY2004, coordinate with the OWR, OTCA and NBC an inspection target for businesses generating hazardous waste in the watershed to Outfall W-6 on the Woonasquatucket River in Johnston and Providence. By 8/03, identify actual inspection numbers out of 27 businesses. Inspect initial 14 generators by 12/03. Issue appropriate enforcement actions and assess response to voluntary compliance with OTCA. For FY 2005, by 7/04, complete inspections on remaining businesses that have not responded to OTCA for voluntary compliance.</li> <li>• <u>RCRA</u> – for FY2004, coordinate with the OTCA regarding the department’s auto body ERP and select specific inspection targets to audit compliance with the ERP. Conduct 30 audit inspections for FY 2005.</li> <li>• <u>RCRA</u> – for FY 2004, by 6/04, conduct 36 small quantity hazardous waste generator inspections in the metal finishing industry. Inspection targets will be chosen from non-notifying businesses.</li> <li>• <u>RCRA</u> – for FY2005, by 6/05 conduct 40 small quantity hazardous waste generator inspections. Continue with the metal finishing, non-notifiers initiative.</li> <li>• UST – for FY2004, by 6/04, conduct 60 compliance evaluations of UST facilities. For FY2005, by 6/05, conduct an additional 60 compliance evaluations of UST facilities.</li> </ul>

## Enforcement and Compliance Assistance

Key Strategies	Performance Measures
	<ul style="list-style-type: none"> <li>Continue to enter inspection information and findings into the federal database to support information systems under the Clean Water Act, the Clean Air Act and the Resource Conservation and Recovery Act.</li> </ul>
Conduct consistent, high quality inspections.	<ul style="list-style-type: none"> <li>By 7/04, put into place a multi-media training schedule for department inspectors. Develop criteria for all inspectors to follow to facilitate consistent inspection results/outcomes.</li> <li>Ensure that all inspectors follow RIDEM's Administrative Inspection Guidelines for inspections on private property.</li> </ul>

### Objective: Deter regulatory non-compliance thru enforcement

#### Indicators

Key Strategies	Performance Measures
Take informal actions to bring entities back into compliance (OWM)	<ul style="list-style-type: none"> <li>Number of informal enforcement actions issued by OWM.</li> <li>Number of informal enforcement actions resolved by OWM</li> </ul>
Take informal actions to bring entities back into compliance (OCI)	<ul style="list-style-type: none"> <li>Provided staff resources are available, issue informal enforcement letters within 90 days following identification of violations of environmental laws or regulations that do not rise to the level of significant noncompliance.</li> <li>Informal enforcement actions include requirements to restore damaged resources where applicable.</li> <li>Track and report numbers of informal enforcement actions issued and resolved.</li> </ul>
Take formal enforcement actions for significant non-compliance.	<ul style="list-style-type: none"> <li>Immediate compliance orders issued to stop significant environmental harm or threat to the public health, safety, or welfare.</li> <li>Owners/operators are informed of significant noncompliance at the site if possible or by letter sent no later than 20 days after the inspection.</li> <li>Provided OC&amp;I and Legal staff resources are available, formal enforcement actions are issued within 180 days of determination that significant noncompliance exists.</li> <li>In addition to other policies and guidelines, RIDEM's enforcement practices follow national enforcement guidelines for EPA programs involving water, waste and air.</li> <li>Formal enforcement actions include proposed penalties developed in accordance with RIDEM's penalty regulations.</li> </ul>
	<ul style="list-style-type: none"> <li>Monetary penalties recovered are in accordance with federal and state penalty policies/regulations. Penalty assessments include an economic benefit penalty where appropriate and a gravity based penalty to deter noncompliance.</li> </ul>

## Enforcement and Compliance Assistance

Key Strategies	Performance Measures
	<ul style="list-style-type: none"> <li>• Enforcement requirements, orders, agreements, penalty payments are tracked and monitored.</li> <li>• Enforcement case backlogs evaluated for further action.</li> </ul>
	<ul style="list-style-type: none"> <li>• Penalty only noncompliance cases are referred to a collection agent to obtain and track payment</li> </ul>
Negotiate consistent and fair settlements of formal enforcement actions.	<ul style="list-style-type: none"> <li>• Settlement of formal enforcement cases documented with recommendations prepared in writing in advance of execution of any consent agreement.</li> <li>• Settlement of formal enforcement cases conducted consistent with administrative penalty regulations.</li> <li>• Supplemental Environmental Projects agreed to are evaluated and accepted consistent with RIDEM policy on SEPs.</li> <li>• OC&amp;I, where appropriate, continue to participate in RIDEM's mediation process in an effort to close out old cases.</li> </ul>
Defend against appeals of formal enforcement actions.	<ul style="list-style-type: none"> <li>• OC&amp;I and the Office of Legal Services are prepared to defend the enforcement action at AAD. Where necessary, other media offices will have staff prepared to testify to defend the enforcement action.</li> </ul>
Enforcement referrals are made to Superior Court to ensure enforcement of environmental laws and regulations.	<ul style="list-style-type: none"> <li>• Referrals to the Office of Legal Services are made on a timely basis to seek enforcement of orders or consent agreements by the Superior Court.</li> <li>• Referrals are prioritized to assist in identifying where legal resources are best assigned to prevent harm to the public's health, safety and the environment.</li> </ul>

### Objective: Develop outreach, assistance, policy and guidance

#### Indicators

Key Strategies	Performance Measures
Develop and implement policies to support enforcement programs (OCI)	<ul style="list-style-type: none"> <li>• Through FY2004, OC&amp;I managers and supervisors will provide timely comments and information to assist in the completion of RIDEM's enforcement response policy.</li> <li>• By 9/03, RIDEM's revisions to the RCRA enforcement response policy are drafted and referred to EPA for comment.</li> <li>• By 10/03, recommendations for revisions to the Rules and Regulations for the Assessment of Administrative Penalties drafted for evaluation.</li> <li>• Refer to section Preserve and Restore the Land section of work plan for improvements and updates of regulations.</li> </ul>

## Enforcement and Compliance Assistance

Key Strategies	Performance Measures
<p>Ensure professionalism by inspectors and other employees (OCI)</p>	<ul style="list-style-type: none"> <li>• Training efforts are continued to ensure staff is knowledgeable about the latest regulatory interpretations, court decisions, etc.</li> <li>• Efforts are continued to ensure that staff is allowed to participate in training provided by EPA, NEWMOA, NESCAUM, NEEP, NEWIPCC or other regional and national organizations.</li> <li>• Internal multi-media training efforts as well as periodic review of current and new practices and procedures are continued.</li> <li>• State and federal training seminars identified and staff training upgraded on a yearly basis</li> </ul>
<p>Develop and distribute materials and policies for compliance assistance</p> <ul style="list-style-type: none"> <li>• Develop new policy for management of washwater and stormwater at Auto Body Shops</li> </ul>	<ul style="list-style-type: none"> <li>• Information distributed</li> <li>• New policy developed and distributed to shops</li> </ul>
<p>Communicate enforcement efforts to the public and to internal and external partners (OCI)</p>	<ul style="list-style-type: none"> <li>• Coordination maintained with regional and national federal/state associations dealing with water, waste and air related matters to identify latest enforcement issues and program improvements.</li> <li>• Monthly web page of enforcement actions issued/settled updated</li> <li>• Accomplishment summary of complaint and enforcement efforts reported annually.</li> <li>• Enforcement action information coordinated and shared with EPA on a quarterly basis by media and/or through meetings with other New England states.</li> <li>• By 12/03, OC&amp;I will finalize a tracking database for formal administrative enforcement cases and legal civil cases including components to assist in tracking performance and penalty collection.</li> </ul>
	<ul style="list-style-type: none"> <li>• Enforcement case conclusion data sheets are prepared, reviewed, evaluated and used to document case numbers closed, time frames to close actions and performance gained through compliance and enforcement efforts.</li> </ul>
<p>Ensure that RIDEM's enforcement program is meeting federal expectations as a delegated state under the Clean Air Act, Clean Water Act and the Resource Conservation and Recovery Act (OCI).</p>	<ul style="list-style-type: none"> <li>• For FY2004, coordinate a multi-media enforcement audit by EPA of RIDEM's enforcement and compliance assistance programs.</li> <li>• Media, compliance office staff and enforcement office staff are assigned to assist EPA with its review.</li> <li>• Provide timely comments to EPA following receipt of the initial audit draft to assist in the evaluation and performance review process.</li> <li>• By 6/04, complete the multi-media enforcement and compliance assistance audit.</li> </ul>

## Enforcement and Compliance Assistance

Objective	
<b>Objective: Promote the development and use of environmental management systems</b>	
Indicators	
Key Strategies	Performance Measures
Auto Body Repair facility initiative	<ul style="list-style-type: none"> <li>• Number of companies self-certified.</li> <li>• Number of referrals to OC&amp;I.</li> <li>• Post-certification statistical analysis.</li> </ul>
UST ERP Initiative <ul style="list-style-type: none"> <li>• Develop statistical methodology.</li> </ul>	<ul style="list-style-type: none"> <li>• Workbook and Checklist developed.</li> <li>• EBPI's developed.</li> <li>• Number of facilities self-certified.</li> </ul>
Dry Cleaner ERP Initiative <ul style="list-style-type: none"> <li>• Develop workbook and checklist.</li> <li>• Develop statistical methodology.</li> </ul>	<ul style="list-style-type: none"> <li>• Workbook and checklist developed.</li> <li>• EBPIs developed.</li> <li>• Number of facilities self-certified.</li> </ul>
Exterior Lead Paint Removal Contractor Initiative. <ul style="list-style-type: none"> <li>• Develop workbook and checklist.</li> <li>• Develop statistical methodology.</li> <li>• Implement voluntary program.</li> </ul>	<ul style="list-style-type: none"> <li>• Workbook and checklist developed.</li> <li>• EBPIs developed.</li> <li>• Number of facilities self-certified.</li> </ul>
Expansion of ERP into other sectors Analyze review of ERP Opportunities.	<ul style="list-style-type: none"> <li>• Number of Sectors chosen.</li> </ul>
ISO 14000 Roundtable <ul style="list-style-type: none"> <li>• Participate in ISO Roundtable meetings</li> <li>• Draft policy for ISO 14000 recognition, may include permit streamlining assistance.</li> </ul>	<ul style="list-style-type: none"> <li>• Number of meetings attended.</li> <li>• Number of companies certified to ISO 14000.</li> </ul>
Implement Compliance Incentive Act <ul style="list-style-type: none"> <li>• Review audit findings for compliance with legislation.</li> <li>• Assist Office of Compliance and Inspection with development of regulations.</li> </ul>	<ul style="list-style-type: none"> <li>• Number of audits reviewed.</li> <li>• Regulations drafted.</li> </ul>

## Healthy Communities and Ecosystems

Objective: Provide Healthy Air in Neighborhoods	
Indicators	
Key Strategies	Performance Measures
Response to Nuisance Air Issues.	<ul style="list-style-type: none"> <li>• Receive, investigate and track complaints of fugitive dust, odors, and visible emissions. Handle violations consistent with Enforcement and Compliance Assistance Goals and Objectives.</li> <li>• Coordinate efforts to resolve nuisance air issues internally.</li> </ul>

Objective: Respond to Emergencies and Complaints	
Indicators	
Key Strategies	Performance Measures
Provide 24/7 Emergency Response Coverage.	<ul style="list-style-type: none"> <li>• Maintain rotational call back list.</li> <li>• Respond to after hour emergencies.</li> <li>• Maintain vehicles, equipment and communications to provide appropriate response.</li> </ul>
Improve Emergency Response Contractor Procurement Procedures.	<ul style="list-style-type: none"> <li>• Work with DOA Purchasing to bid new ER MPA format.</li> <li>• Develop MPA for vessel maintenance.</li> <li>• Develop MPA for scientific support.</li> </ul>
Continue to improve partnerships with other state, local and federal Responders.	<ul style="list-style-type: none"> <li>• Conduct multi-agency responses as necessary.</li> <li>• Participate in joint training and response exercises.</li> </ul>
Manage Oil Spill Protection and Response (OSPAR) program.	<ul style="list-style-type: none"> <li>• Prepare annual OSPAR report.</li> <li>• Provide Financial oversight of OSPAR fund.</li> </ul>
Screen complaints and prioritize.	<ul style="list-style-type: none"> <li>• By 1/04 develop a conceptual multi-media complaint investigation team for geographic complaint response. The team will consist of multi-media trained inspectors that will triage and prioritize violations for enforcement action.</li> <li>• By 7/04, train and implement the multi-media complaint investigation team.</li> </ul>
Respond to priority complaints.	<ul style="list-style-type: none"> <li>• Complaints received are documented and entered into a database.</li> <li>• Investigations of complaints are commenced in a timely fashion based upon availability of staff and priority of cases being handled.</li> <li>• Inspections of private property conducted consistent with DEM's Administrative Inspection Guidelines</li> <li>• Inspection reports prepared for all investigations.</li> <li>• Determinations of violations are made expeditiously and prioritized for further action.</li> </ul>

## Healthy Communities and Ecosystems

Key Strategies	Performance Measures
	<ul style="list-style-type: none"> <li>• Owners or operators investigated for alleged violations are informed on site if violations found.</li> <li>• Serious violations are stopped and corrected immediately.</li> <li>• Response to complainants made in a timely fashion.</li> <li>• Coordinate internally on a multi-media basis and with other DEM offices.</li> <li>• Complaint #'s received, investigated or not investigated documented.</li> <li>• By 7/03, develop a new complaint tracking database to assist in determining complaint numbers, open cases, response times, case closure and enforcement actions in response to complaints.</li> </ul>

### Objective: Support Homeland Security and Domestic Preparedness

Indicators	
Key Strategies	Performance Measures
Contingency/Scenario Planning	<ul style="list-style-type: none"> <li>• Exercise and Implement DEM All Hazard Plan</li> <li>• Update and Expand to include Fisheries Closure/Opening Plan, Scientific Response Plan and GIS Response Plan</li> <li>• Conduct DEM Table Top Exercise</li> <li>• Integrate various DEM offices and programs into response drills related to spills, natural and man made disaster response.</li> <li>• Evaluate DEM performance through after action and post exercise critical reviews</li> </ul>
Participate in state work groups	<ul style="list-style-type: none"> <li>• Serve as active members of the Lt. Governor's Advisory Council for Homeland Security, Domestic Preparedness Subcommittee, Emergency Support Function Work Group, HAZMAT Working Group and the SERC</li> <li>• Serve as members of the federal regional response team and the USCG Area Committee.</li> <li>• Work closely with the Governor's office Senior Advisor for Homeland Security and Emergency Management</li> </ul>
Equipment Purchasing	<ul style="list-style-type: none"> <li>• Secure funding through DOJ and other funding sources to support departments homeland security mission.</li> <li>• Expend funds in a manner that supports the Emergency Response Program's Homeland security mission as well as other DEM offices that have an ancillary role.</li> </ul>

## Healthy Communities and Ecosystems

Key Strategies	Performance Measures
Training	<ul style="list-style-type: none"> <li>• Use ER Training MPA to provide courses to DEM ER staff and other programs involved with response activities.</li> <li>• Conduct 3 ICS training courses annually.</li> <li>• Participate in DOJ, EPA and other federal agency sponsored training.</li> <li>• ER staff to provide inter- and intra- training classes related to hazardous materials.</li> </ul>
Employee Protection/Infrastructure	<ul style="list-style-type: none"> <li>• Develop a Continuity of Operations Plan (COOP) for DEM.</li> <li>• Respond to employee concerns related to employee safety.</li> <li>• Implement DEM Respirator Plan.</li> </ul>

Objective: Control priority chemicals (lead, mercury, dioxin, etc.)	
Indicators	
Key Strategies	Performance Measures
Implement Mercury Regulations	<ul style="list-style-type: none"> <li>• Number of companies reporting to IMERC.</li> <li>• Mercury reduction in products due to legislation/regulations.</li> </ul>
<p>Control exposures to exterior lead paint (See also Respond to priority complaints and Deter regulatory non-compliance through enforcement)</p> <p>Implement voluntary ERP for exterior lead painting companies.</p>	<ul style="list-style-type: none"> <li>• The OC&amp;I will respond to and investigate complaints of improper removal of exterior lead paint.</li> <li>• Number of companies participating in voluntary ERP</li> <li>• OC&amp;I air inspectors shall issue a field notice of noncompliance where violations are uncovered. Immediate compliance orders shall be issued where significant noncompliance is uncovered and the contractor refuses to comply with stopping a threat to the public's health and safety.</li> <li>• Clean ups of contaminated properties due to improper exterior lead paint removal will be monitored and tracked for compliance.</li> <li>• As staff resources are available, OC&amp;I air inspectors will check problem urban areas with known lead paint removal problems and will check alternative removal. projects authorized by the OAR to ensure compliance.</li> </ul>
Monitor and participate in regional efforts on dioxin.	<ul style="list-style-type: none"> <li>• Monitor EPA initiatives and participate, where feasible.</li> </ul>

## Healthy Communities and Ecosystems

<b>Objective: Minimize and recycle waste materials</b>	
<b>Indicators</b>	
<b>Key Strategies</b>	<b>Performance Measures</b>
Monitor quantities and types of hazardous waste generated in the State.	<ul style="list-style-type: none"> <li>Change in hazardous waste generation per State reporting period. 2001 vs. 2003 Biennial Report.</li> </ul>
Monitor the quantities and types of solid waste managed, disposed of, and recycled in Rhode Island.	<ul style="list-style-type: none"> <li>R.I. Waste generation rate.</li> <li>Compile and analyze Solid Waste report by October 15th annually.</li> </ul>
Promote beneficial uses of Solid Waste (BUD determination).	<ul style="list-style-type: none"> <li>Quantity of solid waste material recycled or reused thru BUD determination (by waste material type/classification and reuse type/classification).</li> </ul>
Support recycling. Investigate an ERP for commercial recycling companies in partnership with RI RRC. (Pending new staff support).	<ul style="list-style-type: none"> <li>Attend thru 1/04 monthly meetings on revisions to Statewide Solid Waste Plan.</li> <li>Number of companies participating in ERP</li> <li>Quantity of materials recycled</li> </ul>
Prevent adverse impacts to ground and surface water from selected replacement of MTBE gasoline additive.	Status of NEIWPC study.

<b>Objective: Encourage the prevention of pollution before creation (OTCA)</b>	
<b>Indicators</b>	
<b>Key Strategies</b>	<b>Performance Measures</b>
Provide guidelines and options for P2 <ul style="list-style-type: none"> <li>Provide on-site technical assistance on a limited basis,</li> <li>Speak at conferences/Workshops,</li> <li>Continue to support URI and NBC programs/initiatives,</li> <li>Participate in quarterly Business Round Table meetings.</li> </ul>	<ul style="list-style-type: none"> <li>Number of on-site visits performed</li> <li>Number of presentations made</li> <li>Number of people in attendance</li> <li>Number of initiatives supported</li> <li>Meeting attended</li> </ul>
Develop sustainable funding for programs <ul style="list-style-type: none"> <li>Establish and coordinate a Pollution Prevention Round Table.</li> <li>Increase funding through grants, legislation, and/or budget revisions, based on Round Table recommendations.</li> </ul>	<ul style="list-style-type: none"> <li>Number of Round Table meetings</li> <li>Amount of funding received</li> </ul>
Integrate P2 into regulatory programs Utilize ERP to integrate pollution prevention into other programs.	<ul style="list-style-type: none"> <li>Number of ERPs in other sectors</li> <li>Number of EBPIs</li> </ul>

## Healthy Communities and Ecosystems

Objective: Ensure dam safety and maintenance	
Indicators	
Key Strategies	Performance Measures
<p>Ensure dams are managed and maintained in a safe condition.</p>	<ul style="list-style-type: none"> <li>• By 7/04, re-inspect all High Hazard Dams to ensure dams are being maintained in a safe condition</li> <li>• By 9/03, triage 300 unclassified dams and prioritize 40 of these dams for consultant evaluations. Identify any dams not in dam safety database.</li> <li>• Expand Dams engineering consultant inspection contract to cover additional 40 dams for evaluation. By 9/04, evaluate consultant inspection results, review final report, and prepare project report with recommendations.</li> <li>• Prioritize and inspect those dams where inquiries are received from the owner, the public or municipal officials.</li> </ul>
<p>Improve/update dam safety program and regulations.</p>	<ul style="list-style-type: none"> <li>• Continue to work on and finalize dam safety regulations. By 9/03, have draft regulations prepared for external public review and comment.</li> <li>• By 7/04, implement revised dam safety regulations</li> <li>• By 9/04, develop dam safety registration process.</li> </ul>

## Preserve and Restore the Land

<b>Objective: Promote the reuse of Brownfields</b>	
<b>Indicators</b>	
<b>Key Strategies</b>	<b>Performance Measures</b>
Respond to proposals to clean-up/reuse sites.	Number of settlement agreements executed (Target 18 / 2 yrs.)
Conduct site investigations at Brownfields Sites.	<ul style="list-style-type: none"> <li>• Number of TBAs initiated by OWM (6 expected)</li> <li>• Number of TBAs with field activities completed</li> <li>• Number of TBAs completed by OWM (4 expected)</li> <li>• Number of TBAs received from EPA (3 expected)</li> </ul> Number of reviews completed of EPA TBAs (3 expected)
Finalize Brownfields pilot closure report.	Submission of closure report to EPA by 12/03.
Support Brownfields Revolving Loan Fund (EDC Lead).	Number of applications reviewed for projects utilizing the Revolving Loan Fund –6 expected
Continue marketing and communicating Brownfields Program efforts (sites with settlement agreements).	<ul style="list-style-type: none"> <li>• Acres of Land Remediated and Reused – Goal of 60 acres / 2 yrs.               <ul style="list-style-type: none"> <li>○ Total assessed Value \$\$</li> <li>○ Taxes assessed \$\$</li> <li>○ Number of new or retained jobs</li> <li>○ Estimated Annual Income Tax \$\$</li> </ul> </li> </ul>

<b>Objective: To clean up and control contaminated sites.</b>	
<b>Indicators</b>	
<b>Key Strategies</b>	<b>Performance Measures</b>
Ensure sites are properly investigated.	<ul style="list-style-type: none"> <li>• Percent of federal LUST sites that are active.</li> <li>• Percent of non-federal LUST sites that are active.</li> <li>• Number of State site SIR's approved (RDLs issued)</li> <li>• Percent of active State sites in the investigation phase.</li> <li>• Number of RI/FS's completed at NPL sites (3 OU's anticipated)</li> <li>• Number of RI's completed at DOD/FUD sites (10 anticipated)</li> <li>• Number of inactive landfills participating in the landfill closure program (Goal 25 by 6/30/05)</li> </ul>
Ensure Remedies are Protective and Cost-effective Remedies.	<ul style="list-style-type: none"> <li>• Number of Corrective Action Plans approved at LUST sites.</li> <li>• Number of Remedial Action Work Plans approved at State sites.</li> <li>• Percent of active State sites in Remedial Phase (i.e.: active sites w/RDL/# active sites).</li> <li>• Final RD completed at Rose Hill by 12/03.</li> <li>• Number of Remedial Designs completed (target – 4 DOD/FUD sites).</li> </ul>

## Preserve and Restore the Land

Key Strategies	Performance Measures
	<ul style="list-style-type: none"> <li>• Number of archived CERCLIS sites.</li> <li>• Number of landfills in the Remedial Action Phase (i.e.: participating landfills with SIR complete and ROL issued (Goal 5 RDL's issued by 6/05.)</li> </ul>
Ensure sites with residual contamination are effectively maintained and monitored.	<ul style="list-style-type: none"> <li>• Number of state sites undergoing compliance monitoring (only)</li> <li>• Number of LUST sites in long term monitoring.</li> <li>• Number of NPL operable units in the O &amp; M phase (expected 9 NPL sites remaining in O &amp; M)</li> <li>• Number of DOD-NPL operable units in O &amp; M phase (expected 3 NPL operable units entering O &amp; M phase)</li> <li>• Number of DOD sites (Non-NPL) in O &amp; M Phase (5 Federal facilities in O &amp; M)</li> <li>• Number of landfills with completed remedies and in Long term monitoring (Landfills with ILOC issued - Goal 7 by 6/05, including 6 landfills that ceased receiving waste post 1992)</li> </ul>
Improve regulations and understanding of program requirements.	Complete regulatory revisions by 7/03.
Information management and Communications.	Continue implementation of the Environmental Monitoring Database system (EQUIS)
Quality systems and quality management: Ensure that all environmental related measurement and remediation projects performed or supported by EPA is of known and acceptable quality.	<ul style="list-style-type: none"> <li>• Update QAPPs annually</li> <li>• Provide staff with QA/QC training (Fall 2003)</li> </ul>
Review and respond to site specific risk assessments	<ul style="list-style-type: none"> <li>• Conduct human health risk assessments of site remediation plans.</li> <li>• Develop risk assessment guide.</li> </ul>

## Preserve and Restore the Land

<b>Objective: To ensure the proper transportation, storage, management and disposal of solid waste, hazardous waste and medical waste</b>	
<b>Indicators</b>	
Key Strategies	Performance Measures
Ensure wastes are managed in accordance with current standards (transporter permits, HW permits, SW permits, manifests, variances).	<ul style="list-style-type: none"> <li>• Number of transporters permitted (permits will be issued within 45 days of receipt of completed application)</li> <li>• Complete review of Chempak application by 12/03.</li> <li>• Number of requests for HW variances received/reviewed (2 expected).</li> </ul>
Refer to Enforcement and Compliance Assistance for additional enforcement activities.	<ul style="list-style-type: none"> <li>• Number of SW applications under review (by type) (new/renewal) <ul style="list-style-type: none"> <li>• Landfills</li> <li>• Transfer Stations</li> <li>• Construction &amp; Demolition Debris Processing Facilities</li> <li>• Composting Facilities</li> </ul> </li> <li>• Number of SW applications approved, denied, or withdrawn <ul style="list-style-type: none"> <li>• Landfills</li> <li>• Transfer Stations</li> <li>• Construction &amp; Demolition Debris Processing Facilities</li> <li>• Composting Facilities</li> </ul> </li> </ul>
Improve regulations and understanding of program requirements (RCRA Authorization).	<ul style="list-style-type: none"> <li>• By 3/04, adopt used oil regulations that are consistent with EPA RCRA federal regulations.</li> <li>• By 6/04, develop a final draft of revisions to the generator portion of the Hazardous Waste Regulations.</li> <li>• By 1/05, obtain EPA approval and adopt revised generator portion of the Hazardous Waste Regulations</li> </ul> <p>* Status of program authorization</p>

<b>Objective: To ensure the proper management of Underground Storage Tank Systems</b>	
<b>Indicators</b>	
Key Strategies	Performance Measures
Ensure proper installation/upgrade of UST systems.	<ul style="list-style-type: none"> <li>• Number of facilities that have submitted applications for new installations or upgrades (34 per year expected).</li> <li>• Review of applications for new installations or upgrades will be completed within 21 days of receipt).</li> </ul>
Ensure proper operation and maintenance (O&M) of UST systems (Registrations, testers, ERP, inspections, outreach).	Number of facilities invoiced for UST's (invoices to be issued by September 30 <sup>th</sup> )
Conduct compliance reviews for reimbursement.	<ul style="list-style-type: none"> <li>• Review the compliance status of UST Facilities for UST Fund eligibility within 30 days of receipt.</li> <li>• Total number of compliance determinations received from the UST Fund Board (12 expected per year).</li> </ul>
Ensure proper UST closures for registered and abandoned tanks.	<ul style="list-style-type: none"> <li>• Number of UST closure applications received</li> <li>• Number of UST closure applications reviewed</li> </ul>
Ensure Proper Operation and Maintenance of Uses.	Refer to Goal: Enforcement and Compliance Assistance.

