MINUTES

OF THE

ENVIRONMENTAL PROTECTION COMMISSION

MEETING

JUNE 17, 2014

IOWA DEPARTMENT OF NATURAL RESOURCES
7900 HICKMAN ROAD
WINDSOR HEIGHTS, IOWA

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MEETING MINUTES

CALL TO ORDER

The meeting of the Environmental Protection Commission was called to order by Chairperson Mary Boote at 10:10 a.m. on June 17, 2014 in the DNR Hickman facility in Windsor Heights, Iowa.

COMMISSIONERS PRESENT

Mary Boote, Chair
Nancy Couser, Secretary
LaQuanda Hoskins
Chad Ingels
Brent Rastetter – participated via phone for item #11 only
Gene Ver Steeg

COMMISSIONERS ABSENT

~~Cindy Greiman~~
Brent Rastetter
Bob Sinclair
Max Smith, Vice-Chair

ADOPTION OF AGENDA

Motion was made by Chad Ingels to approve the agenda as presented. Seconded by Nancy Couser. Motion carried unanimously.

APPROVED AS PRESENTED

APPROVAL OF MINUTES

Motion was made by Gene Ver Steeg to approve the May 20, 2014 EPC meeting minutes. Seconded by LaQuanda Hoskins. Motion carried unanimously.

APPROVED AS PRESENTED

DIRECTORS REMARKS

Deputy Director and Director were not available to attend as they were in Washington DC to meet with congressional delegates and representatives from EPA, USDA and US Fish & Wildlife.

INFORMATION

CONTRACT WITH UNIVERSITY OF IOWA FOR DAM SAFETY INSPECTORS

Lori McDaniel, Supervisor of the Floodplain Management Section of the Land Quality Bureau presented the following item.

Commission approval was requested for a one year-service contract with the University of Iowa, Iowa City, IA. The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $60,080.

Funding Source: This contract will be funded through the federal Dam Safety Grant (CFDA 97.041) and State General Fund specifically appropriated to Flood Plain Management & Dam Safety.

Background: The Iowa Department of Natural Resources has the authority to perform periodic inspections of dams to ensure the safety of human life and property.

The DNR's Dam Safety Program is tasked with protecting the public from risks associated with dams. The stored water behind a dam can cause extensive damage downstream if the dam should fail. The DNR inspects dams meeting these criteria:

- All high hazard dams (every two years)
- Moderate hazard dams with permanent water storage or more than 100 acre feet and with more than 250 acre feet of top of dam storage (every five years)
- ~~Dams where the storage capacity multiplied by the dam's height is greater than 30,000 (every five~~ years)
- The DNR will also visit dams that show possible signs of failure or at the request of a dam owner.

Inspectors look for:

- Damage to the embankment, including vegetation, waterline erosion, poor slope stability, damage from burrowing rodents and signs of seepage.
- The condition of the dam's main spillway, making sure it is clear of debris and structurally sound, and other parts of the spillway are working.
- The condition of the emergency spillway, ensuring it is free of trees, brush and debris.
- Functioning drains and outlets.
- Any changes to conditions or land uses downstream.
- Verification the dam is operating under its permit conditions.

Currently, dam safety program staff is working with about 40 owners of dams that have not been ranked "satisfactory." Generally, these dams need repairs to their spillways, need trees removed, have seepage problems or need to be brought up to modern design criteria.

Purpose: The parties propose to enter into this Contract for the purpose of retaining the Contractor to provide: 2 Dam Safety Inspectors on a part time/hourly basis.

Inspections are completed by the two part-time contract inspectors, Dick Hall out of Sioux City and Larry Dorgan out of Creston. Both are retired NRCS engineers. The DNR's senior dam safety engineer assigns dam inspections to each inspector. After the inspection is completed, the report is sent back to the dam safety engineer, who then begins any compliance follow-up actions as necessary.

Motion was made by Nancy Couser to approve the agenda item as presented. Seconded by Chad Ingels. Motion carried unanimously

APPROVED AS PRESENTED

CONTRACT USGS STREAM GAGE AGREEMENT

Lori McDaniel, Supervisor of the Floodplain Management Section of the Land Quality Bureau presented the following item.

The Department requested Commission approval of a contract for $225,970 with USGS for the time period of July 1, 2014 – June 30, 2015. The Department's contribution to this agreement is $224,100. The USGS contribution to this agreement is $1,870. This agreement covers the continuing support, operation and maintenance of 16 stream gaging stations - 14 fully supported and 2 partially supported. The individual gages are listed below.

Funding Source:
This project will be funded through state general fund dollars specifically dedicated to Flood Plain Management and Dam Safety.

Background:
After the floods of 2008, a legislative appropriation was made dedicated to flood plain management and dam safety. Part of the legislative intent of this funding was to continue to support USGS stream gaging efforts in Iowa.

Purpose:
The purpose of this contract is to continuing support, operation and maintenance of 16 stream gaging stations. There are 14 fully supported gages and 2 partially supported gages. These stream gages will assist in the tracking and predicting of flood events by compiling the necessary data relating to flood frequency analysis.

USGS Joint Funding Agreement:
The USGS operates and maintains approximately 7,500 stream gages which provide long term, accurate, and unbiased information on stream low to meet the needs of many diverse users. The USGS stream gaging network is currently funded in partnership with over 800 Federal, State, and local agencies nationwide. The Iowa DNR has partnered with USGS for many years to maintain Iowa's network of stream gages. The data gathered through the use of these stream gages is consistent, obtained by using standard techniques and technology and is subject to quality assurance and quality control.

Scope of Work:
The scope of work of this contract is the continued support, operation and maintenance of 16 stream gaging stations. There are 14 fully supported gages and 2 partially supported gages.

Commissioner Nancy Couser inquired about public access to the information collected by the stream gages. Lori McDaniel shared with the Commission any person with an internet connection may retrieve information from the gages in real time.

Motion was made by Chad Ingels to approve the agenda item as presented. Seconded by Gene Ver Steeg. Motion carried unanimously

APPROVED AS PRESENTED

UNIVERSITY OF NORTHERN IOWA, IOWA WASTE REDUCTION CENTER – IOWA WASTE EXCHANGE PROGRAM TECHNICAL ASSISTANCE, DATABASE MANAGEMENT AND TRAINING

Jennifer Wright, Supervisor of the Financial & Business Assistance Section of the Land Quality Bureau presented the following item.

The Department requested Commission approval of a contract in the amount of $30,000 with the University of Northern Iowa, Iowa Waste Reduction Center (IWRC) for one year. The contract is for the IWRC to provide technical assistance, database management and training for the Iowa Waste Exchange program.

Funding Source:
This project will be funded through the Groundwater Protection Fund, Solid Waste Account where monies are received from the tonnage fee imposed under section 455B.310.

Background:
Iowa Code section 455E.11(2)(*a*)(2)(c) Groundwater Protection Fund, requires that:

The Department shall expend not more than thirty thousand dollars of the moneys appropriated under this subparagraph subdivision to contract with Iowa Waste Reduction Center (IWRC) at the University of Northern Iowa.

Purpose:
The purpose of this contract is to provide technical assistance, database management and training to the Iowa Waste Exchange program and its Representatives.

Consulting Firm Selection Process:
A selection process was not conducted because these moneys are legislated to be distributed to the University of Northern Iowa, Iowa Waste Reduction Center.

Based on the Iowa Code and existing relationships with the University of Northern Iowa, we recommend the contract with the University of Northern Iowa, Iowa Waste Reduction Center be approved.

Motion was made by Gene Ver Steeg to approve the agenda item as presented. Seconded by Nancy Couser. Motion carried unanimously

APPROVED AS PRESENTED

REGION XII COUNCIL OF GOVERNMENTS - GRANT AWARDEE FOR DELIVERY OF THE IOWA WASTE EXCHANGE PROGRAM

Jennifer Wright, Supervisor of the Financial & Business Assistance Section of the Land Quality Bureau presented the following item.

The Department requested Commission approval of a renewed grant award, amended to the amount of $415,000, to the Region XII Council of Governments for a one year extension of the grant previously renewed last year, and with the option now of three additional year extensions, for the delivery of the Iowa Waste Exchange (IWE) program.

Funding Source:
This project is funded through the Groundwater Protection Fund, Solid Waste Account where monies are received from the tonnage fee imposed under Iowa Code section 455B.310. The specific allocation from the Fund directed to this grant is in Iowa Code section 455E.11 Ground Water Protection Fund Established Appropriations.

Background:
According to Iowa Code section 455E.11(2)(*a*)(2)(c), in the Groundwater Protection Fund, Solid Waste Account, out of the first $1.50 per ton collected:

Six and one-half percent [shall be used] for the department to establish a program to provide competitive grants to [one or more community colleges or councils of governments] for projects ... related to a by-products and waste exchange system.

Purpose:
Since 1990, the IWE has been a free, confidential, non-regulatory program that enables the recycling of used and unwanted materials by matching parties that have those materials with others who look to obtain and add value to such resources. The Grantee under this Agreement sub-contracts and supervises the work of regionally-based Resource Specialists. Performing the direct work of the IWE, Resource Specialists facilitate the waste exchange matches, as well as provide a range of services to help divert many thousands of tons of by-products and excess materials from Iowa landfills, help manage and reduce waste streams, and enhance pollution prevention.

Consulting Firm Selection Process:
On June 19, 2012, the Environmental Protection Council approved the award of an IWE grant, which provided for up to five annual renewal extensions depending on satisfactory performance by the Grantee, Region XII Council of Governments. On June 18, 2013, the Council approved the first extension renewal of this Grant Agreement.

Based on Iowa Code, and on the continued satisfactory performance by the Region XII Council of Governments, we request the second extension renewal of the Iowa Waste Exchange grant award as amended be approved.

Motion was made by Nancy Couser to approve the agenda item as presented. Seconded by LaQuanda Hoskins. Motion carried unanimously

APPROVED AS PRESENTED

SOLID WASTE ALTERNATIVES PROGRAM – CONTRACT RECOMMENDATIONS

Tom Anderson, Executive Office of the Solid Waste Alternatives Program of the Land Quality Bureau presented the following item.

The Department received 10 proposals requesting $205,130 in financial assistance during the April 2014, round of funding. The review committee selected each of the ten (10) projects for funding for a total of $194,371. One (1) proposal recommended for funding is greater than $25,000 awarding a total of $37,070 in a combination of a forgivable and zero percent loans.

The review committee consisted of five persons representing the Land Quality Bureau (2), Iowa Society of Solid Waste Operations (1), Iowa Recycling Association (1), and the Iowa Waste Exchange (1).

The Department requested Commission approval to enter into a contract with the selected applicant.

A description of the recommended project, the project type, the amount and type of funding assistance were provided.

Motion was made by Gene Ver Steeg to approve the agenda item as presented. Seconded by Chad Ingels. Motion carried unanimously

APPROVED AS PRESENTED

Chairperson Boote presented the advice from Megan Tooker, Director and Legal Counsel, Iowa Ethics and Campaign Disclosure Board, with regards to a recent concern expressed by certain members of the public that EPC members with a financial interest in animal feeding operations cannot vote on the upcoming CAFO rule. The advice from Megan Tooker is as follows, "board members and commissioners may vote on rules of general oculability even if they impact the board members business or occupation."

PUBLIC COMMENT

Linda Kinman – Des Moines Water Works
Linda provided a copy of a letter that was addressed to Gene Tinker regarding Des Moines Water Works' opinion that EPC commissioners who own or operate, directory or indirectly, an animal feeding operation or confined animal feeding operation must abstain from voting on the CAFO rules.

Shari Hawk – ICCI
Sherry shared her concerns regarding farming practices and Iowa's water quality. She shared her observations that many farmers are farming right up to the edge of the river. Voluntary compliance is not working.

Brenda Brink – ICCI member from Huxley
Brenda indicated that if an EPC commissioner stands to gain financially from voting, they should not vote. Many citizens in Iowa are concerned about clean water.

Verne Tigges – ICCI member from Adel
Verne reiterated that the Commissioners should know all the public comments received regarding the CAFO rule and the things that need to be included in a final rule (CWA NPDES permit for all factory farms, 3 strikes and you're out provision, a transparent DNR CAFO database and strong inspection/enforcement). He also expressed his opinion that certain EPC commissioners must recuse themselves from voting on this rule.

Larry Ginter – ICCI member
Larry voiced his concerns about the "cavalier" attitude that the Governor, DNR and EPC commissioners have regarding holding factory farms accountable.

Jane Aldermen – ICCI member from Ankeny
Jane shared a story about how several of her co-workers were unaware of the clean water problem and assumed that the government was taking care of the issue. Now they are wondering why the government is not doing something about this.

Ed Rethman – ICCI member from West Des Moines
Ed discussed the issue of the commissioners not recusing themselves from making decisions regarding the Clean Water rules. He stated that just because something is legal doesn't make it right.

Stephen Tewis – ICCI member from Ottumwa
Stephen voiced his concerns regarding the farming practices of the farmers of Iowa and making sure that we are holding them accountable.

Deborah Bunka – ICCI member from Ames
Deborah voiced concerns regarding the new CAFO near Nevada that was recently approved by the Story County Board of Supervisors. The County approved the application only after the application was amended right before the public meeting. A complaint has now been filed with Iowa's Public Information Board (IPIB). She asked the Commission to suspend its approval of this application until this complaint has been acted upon by the IPIB.

Don Wilth – ICCI member from Boone County
Don voiced his concerns regarding the water quality of the State of Iowa. He stated that Iowa is ranked last in the country. He feels that no one is holding the farmers accountable for the pollution that they cause.

Jim Yungclas – ICCI member from Grinnell & CARES
Jim shared his concerns about the quality of water in the State. He stated that we need a type of agriculture that protects the environment. He believed the commissioners are listening but he wants something done.

LaForest Sherman – ICCI member from Grinnell & Poweshiek CARES
LaForest wanted stronger clean water rules. He stated that agriculture today is ruining our livelihood and ruining our environment.

Connie Leino – Citizen from Windsor Heights
Connie shared her concerns regarding the Clean Water Act and the commissioners not recusing themselves from the upcoming CAFO rule vote.

Lee Barclay – ICCI member
Lee shared his frustrations how the Governor, DNR and EPC have continued to bend over backwards for the factory farmers of Iowa. He asked again for an online CAFO/AFO database available to the public.

Susie Petra – ICCI member from Ames
Susie shared her concerns regarding Iowa's environment. She learned to swim in the Iowa River. Now, she would not even wade in the river.

Barb Kalbech – ICCI member from
Barb shared her concerns regarding fugitive manure and factory farming. She listed each commissioner and stated how many CAFO/AFO facilities they each owned and stated they should recuse themselves because it's the right thing to do.

Wendie Schneider – Citizen from Nevada
As a neighbor of the proposed CAFO facility, Wendie requested that the Commission suspend the CAFO application that was recently approved by the Story County Board of Supervisors until the public comment issue has been resolved.

John Monroe – Citizen from Nevada
John wanted to voice his concerns regarding the CAFO in Millford Township. He felt the public interest is not being considered but it is being considered for the commercial interests.

Eric Riesenberg – Citizens of Des Moines
Eric voiced his concerns regarding public records only being available in paper form.

Jess Mazour – ICCI member
Jess voiced her concerns regarding the proposed CAFO rule not being strong enough.

Even Burger – ICCI member in Ankeny
Even also voiced his concerns regarding the CAFO in Millford Township. He asked the DNR to suspend the application until after the public comment issue is resolved.

Chris Peterson – Family Farmer
Chris shared how his family farm is different from the factory farms (industry). He stated that 91% of the family farms are gone.

END OF PUBLIC COMMENT

CLEAN WATER AND DRINKING WATER STATE REVOLVING LOAN FUND – FY 2015 INTENDED USE PLANS

Patti Cale-Finnegan, SRF Coordinator of the Water Quality Bureau and Loir Beary, Iowa Finance Authority presented the following item.

Commission approval was requested for the Clean Water State Revolving Fund (CWSRF) and Drinking Water State Revolving Fund (DWSRF) Intended Use Plans (IUPs) for FY 2015 (July 1, 2014 – June 30, 2015).

The CWSRF finances publicly owned wastewater and sewer facilities, storm water management for water quality, and nonpoint source control practices to keep pollution out of Iowa's water. The DWSRF covers water system projects, including source water, treatment, storage, and distribution and transmission, as well as consolidation and connections.

The Iowa SRF is operated through a coordinated partnership between the Department of Natural Resources (DNR) and the Iowa Finance Authority (IFA). DNR administers the environmental and permitting aspects of the programs, with IFA providing financial assistance including loan approval and disbursements. Other important partners include the U.S. Environmental Protection Agency (EPA), the Iowa Department of Agriculture and Land Stewardship, Soil and Water Conservation Districts, county sanitarians, participating lenders, and others.

The FY 2015 IUPs include plans of action for the SRF programs, including goals and objectives, an analysis of current and projected financial capability, financial management strategies, the project priority lists, discussion of set-aside programs and efforts, and planned uses for administrative accounts. The IUPs are developed and updated quarterly, in June, September, December, and March or more often as needed. Each draft IUP is released for public comment, and then presented for approval to the Commission. A public meeting was held May 8, 2014 to receive comments on the proposed IUP updates. No oral comments were provided at the hearing. The written comment period closed on May 15, 2014. Written comments were received from EPA Region 7 and were addressed in revised drafts.

The Sources and Uses tables for both CWSRF and DWSRF show that funds are available or obtainable to provide anticipated disbursements. The IUPs will be updated quarterly during FY 2015. Iowa continues to be able to fund all projects that are eligible for SRF assistance.

Commissioner VerSteeg inquired how this fund has grown. Lori Beary estimated the fund growth around 4% each year.

Commissioner VerSteeg inquired into the use of the fund for land purchases. Patti Cale-Finnegan shared the parameters and details of using the fund for land purchases.

Motion was made by Chad Ingels to approve the agenda item as presented. Seconded by Nancy Couser. Motion carried unanimously

APPROVED AS PRESENTED

CONTRACT – IOWA DEPARTMENT OF AGRICULTURE AND LAND STEWARDSHIP – UNION GROVE LAKE WATERSHED PROJECT – PHASE 1A WATER QUALITY IMPROVEMENT

Kyle Ament, Environmental Specialist of the Watershed Improvement Section of the Water Quality Bureau presented the following item.

The Department requested Commission approval of a contract in the amount of $56,829 with the Iowa Department of Agriculture and Land Stewardship for one year to promote best management practices in the Union Grove Lake Watershed.

Funding Source:
Federal – Environmental Protection Agency
This project will be funded through Section 319 of the Clean Water Act.

Background:
Originally funded in 2008, the Union Grove Watershed Project has focused on reducing sediment and phosphorus loading from the watershed. In 2012 a large portion of the watershed was protected with the purchase of 80 acres north of the lake. This property provides treatment for 60% of the watershed. The remaining watershed issues will be the focus of this contract.

Purpose:
The parties propose to enter into this contract for the purpose of implementing watershed improvement practices and water quality educational programming for the project selected.

Contractor Selection Process:
This project was chosen using a grant proposal application and committee review process. Selection members consist of Iowa DNR, Iowa Department of Agriculture and Land Stewardship, Natural Resource Conservation Service, Iowa State University, and Conservation Districts of Iowa.

Motion was made by LaQuanda Hoskins to approve the agenda item as presented. Seconded by Nancy Couser. Motion carried unanimously

APPROVED AS PRESENTED

CONTRACT WITH IOWA STATE UNIVERSITY FOR NATIONAL WATER QUALITY INITIATIVE (NWQI) MONITORING IN THE BLACK HAWK LAKE WATERSHED

Allen Bonini, Supervisor of the Watershed Improvement Section of the Water Quality Bureau presented the following item.

Commission approval was requested for a five and a half year service contract with Iowa State University of Ames, Iowa. The contract will begin on July 1, 2014 and terminate on December 31, 2019. The total amount of this contract shall not exceed $461,661.

Funding Source:
This contract will be funded through Section 319 of the Federal Clean Water Act.

Background:
Through the National Water Quality Initiative (NWQI), a joint effort between the EPA and NRCS, local Soil and Water Conservation Districts (SWCDs) are working with landowners and producers to improve water quality in four priority HUC 12 watersheds across Iowa. One of these watersheds, the Black Hawk Lake watershed, was selected for intensive paired subwatershed and in-stream monitoring as part of the NWQI program because of an active and successful project, with many BMPs being implemented on private and public lands. The goal of NWQI monitoring in the Black Hawk Lake watershed is to determine if water quality improvement strategies have been effective at reducing sediment and nutrient loads, which are priority pollutants under the NWQI program.

Purpose:
The parties propose to enter into this Contract for the purpose of retaining the Contractor to provide: Collection, analysis, and evaluation of water quantity and quality monitoring data. The data collected will be used to determine if pollutant load reduction strategies have been effective, and to quantify long-term water quality trends before, during, and after active BMP implementation efforts.

Contractor Selection Process:
Iowa State University was chosen using the process specified in accordance with Iowa Code Section 455B.103, which allows DNR to contract with "public agencies of the state" for those services. Iowa State University was chosen for this project because of the contractor's extensive and specialized experience in successfully completing work of this nature.

Commissioner VerSteeg inquired into the line item budge for the project. Allen Bonini shared with the Commission monitoring is estimated to be $30,000 per sampling session. Monitoring is about 1/3 of the total cost of improving a watershed.

Motion was made by Gene Ver Steeg to approve the agenda item as presented. Seconded by LaQuanda Hoskins. Chad Ingels abstained from voting because of his employment with Iowa State University. Brent Rastetter was on the conference phone to provide a quorum vote. Motion carried unanimously

APPROVED AS PRESENTED

CONTRACT AMENDMENT WITH IOWA DEPARTMENT OF AGRICULTURE AND LAND STEWARDSHIP – DIVISION OF SOIL CONSERVATION FOR EASTER LAKE WATERSHED PROJECT PHASE 1

Rachel Glaza, Environmental Specialist of the Watershed Improvement Section of the Water Quality Bureau presented the following item.

Commission approval was requested for an amendment to the amount of the Easter Lake Watershed Project Phase 1 contract with the Iowa Department of Agriculture and Land Stewardship – Division of Soil Conservation. This is a three year contract that began on November 1, 2013 and will terminate on June 30, 2016. The current amount of the contract is $415,786. Commission approval is requested to amend the amount to $460,786. This is an addition of $45,000 or 11% of the total contract amount. Commission rule requires that any contract amendment in excess of $25,000, or 10% of the original contract, whichever is greater, be approved by the Commission. See 567 IAC chapter 8 (incorporating by reference 561 IAC chapter 8).

Funding Source: Federal – Environmental Protection Agency. This project will be funded through Section 319 of the Clean Water Act.

Background:
Watershed Implementation Grants from the Iowa DNR Watershed Improvement Program intend to put an EPA nine-element Watershed Management Plan (WMP) into action by providing local watershed groups access to federal Section 319 grant dollars. Easter Lake suffers from poor water clarity, algal blooms, high sedimentation rates, low oxygen concentrations, and a poor fishery. In response to these water quality problems, area stakeholders worked together to develop the Easter Lake Water Quality Management Plan (WQMP). The WQMP serves as the culmination of existing studies, citizen and stakeholder input, and a consultant's recommendations for structural and non-structural BMPs intended to reduce stormwater runoff and delivery of pollutants to the lake and ultimately renovate Easter Lake through dredging and other in-lake improvements. This project began in fall of 2013.

Contract History:
On October 14, 2013 the Commission approved the Easter Lake Watershed Project Phase 1 contract with the Iowa Department of Agriculture and Land Stewardship – Division of Soil Conservation for the amount of $415,786. This contract is being amended to include an additional $45,000 for removal of invasive species within Easter Lake Park. This is the first amendment to this contract.

Motion was made by Gene Ver Steeg to approve the agenda item as presented. Seconded by Chad Ingels. Motion carried unanimously

APPROVED AS PRESENTED

CONTRACT WITH UNIVERSITY OF IOWA FOR LABORATORY CERTIFICATION

Kathleen Lee, Environmental Specialist Senior of the Water Quality Bureau presented the following item.

Commission approval was requested for a 2 year - service contract with the University of Iowa – State Hygienic Laboratory (SHL) of Iowa City, Iowa. The contract will begin on July 1, 2014 and terminate on June 30, 2016. The total amount of this contract will be approximately $300,000.

Funding Source: This contract will be funded through Laboratory Certification Fees collected pursuant to 567 Iowa Administrative Code (IAC) 83.3 (455B). The fees paid by laboratories support 100% of the cost of the contract. The contract agreement amount is an estimate because actual cost will be based on the number of laboratories applying for certification in each year of the contract. The IDNR pays 86.0% of the collected fees to SHL through this contract.

Background: The Iowa Department of Natural Resources (IDNR) certifies environmental laboratories throughout the United States for the Clean Water Act (CWA) [wastewater (WW)], drinking water (SDWA), solid waste or contaminated sites (SW/CS) and underground storage tank (UST) environmental programs. The SHL provides technical support as the laboratory appraisal authority. Any laboratory that provides environmental compliance data for Iowa programs must be certified in Iowa. Currently, there are 185 labs certified by the IDNR.

Purpose: The DNR is entering into this Contract with SHL to perform the duties specified in 587 IAC Chapter 83. SHL serves as the state environmental and public health laboratory and possesses the required expertise to conduct this program. SHL will be responsible for reviewing applications from the laboratories, conducting on-site audits of in-state labs, reviewing documents, conducting on-site visits for reciprocal certification of out of state labs, preparing audit and certification documents, providing technical assistance to DNR and Iowa certified laboratories, and maintaining a database to track information, due dates and required actions.

Contractor Selection Process: The SHL was chosen because it is a state public agency that can provide these services. SHL is the state environmental and public health laboratory. The selection of SHL is authorized by Iowa Code chapter 455B.103(3).

Contract History: The IDNR has administered this program since 1986 and has utilized the SHL as the appraisal authority during this time. Fees collected by IDNR have been disbursed to SHL through a formal agreement and in recent years, a contract. The IDNR is authorized to contract with the SHL for these services under Iowa Code chapter 455B.103(3).

Motion was made by Nancy Couser to approve the agenda item as presented. Seconded by Gene Ver Steeg. Motion carried unanimously

APPROVED AS PRESENTED

CONTRACT WITH WINDSOR SOLUTIONS, INC. FOR STATE & LOCAL EMISSIONS INVENTORY SYSTEMS (SLEIS)

Jason Marcel, Supervisor of the Emissions Inventory & Support Section of the Air Quality Bureau presented the following item.

Commission approval was requested for a one-year Information Technology service contract with Windsor Solutions, Inc. The contract is anticipated to begin on September 1, 2014 and terminate on September 1, 2015. The total amount of this contract shall not exceed $70,000. Funding for this contract is from an EPA Exchange Network Grant.

Background:
The DNR applied for and received a federal fiscal year 2013 Exchange Network Grant to implement the State and Local Emission Inventory System (SLEIS). The total amount awarded was $166,360, of which $70,000 is allocated for contracting with Windsor Solutions to install, configure, support, and license SLEIS for a one year period. SLEIS was developed under an EPA Challenge Grant by Windsor Solutions and a consortium of six state and municipal air quality programs. The DNR completed an extensive analysis of SLEIS in 2013 and plans to copy emissions inventory data from DNR's existing system, SPARS, to SLEIS.

This project will begin Phase 1 of modernizing and replacing DNR's State Permitting & Air Reporting System (SPARS). SPARS is a DNR-owned system that has been in production for nearly fifteen years. SPARS was created to allow businesses to submit permit applications and emissions inventory reports to the DNR electronically, as well as to provide project tracking and to meet federal reporting requirements for emissions inventory data. The technology that is used to deploy SPARS needs to be updated and SLEIS has been identified as an "off the shelf" product that meets DNR's need for updating the emissions inventory features of SPARS. SLEIS meets DNR's IT application design standards, EPA's emissions inventory reporting requirements, and was developed collaboratively by a group of states with similar business needs as the DNR.

SLEIS will be implemented, tested, and used internally by the DNR in 2015, during which time an acceptable replacement is further analyzed for the permitting features of SPARS (Phase 2). SLEIS testing by representative industries and consultants will also be requested.

Purpose:
The purpose of this contract is to install, configure, license, and provide one year support of the SLEIS system.

Contractor Selection Process:
A Request For Information (RFI) was published in 2009, in which seventeen vendors provided information related to modernizing SPARS. DNR staff met with each vendor, including Windsor Solutions, to learn more about each product or service. SLEIS was in the process of being developed at the time of the RFI and was the only "off the shelf" system being developed specifically to flow air quality data to EPA's Emissions Inventory System. The other vendors offered business requirement development services, custom application development, code migration services, and other similar solutions. DNR did not proceed further with the competitive bidding process at that time.

After the DNR was awarded the FFY 2013 Exchange Network Grant, the DNR received approval to initiate the SLEIS project from the State Chief Information Officer, State of Iowa Technology Coordinating Committee, and DAS Director in November 2013. The Sole Source Procurement was approved by the Iowa Department of Management at the end of April 2014.

Scope of Work Requirements:
1. Installation of SLEIS software on DNR production/test servers.

2. Configuration of SLEIS software to meet DNR's business use, including establishing help text, and configuring data entry rules using the Software configuration engine.
3. Three days of onsite training at DNR offices on the use and customization of the SLEIS software.
4. Delivery of source code for the SLEIS software.
5. One hundred hours of labor support during the one year term of the contract.
6. Delivery of general updates to the SLEIS software during the term of the contract.

Motion was made by Chad Ingels to approve the agenda item as presented. Seconded by Nancy Couser. Motion carried unanimously

APPROVED AS PRESENTED

CONTRACT WITH UNIVERSITY OF IOWA ON BEHALF OF THE STATE HYGIENIC LABORATORY FOR 2015 SHL SERVICES IN SUPPORT OF THE DNR AIR QUALITY BUREAU

Sean Fitzsimmons, Environmental Specialist Senior of the Compliance & Monitoring Section of the Air Quality Bureau presented the following item.

Commission approval was requested for a one year-service contract with the University of Iowa on behalf of the State Hygienic Laboratory. The contract will begin on 7/1/2014 and terminate on 6/30/2015. The total amount of this contract shall not exceed $2,096,268.

Funding Source: Funding for this contract consists of federal 103 grant funds ($388,310), air contaminant funds ($1,395,014), and State "Environment First" funds ($312,944).

Background: Under Iowa Code 455B.103, the department has responsibility for conducting ambient air monitoring in the State of Iowa. SHL currently operates most of the ambient air monitoring sites in Iowa. It also provides analytical and technical support for ambient air monitoring activities throughout the State. It weighs and determines the ionic composition of particulate samples and performs analysis of air samples for many toxic compounds found in urban air. SHL also provides analysis of asbestos samples gathered by DNR inspectors. The SHL quality assurance group conducts annual audits of SHL ambient air monitoring activities as well as those of the Local Programs. This contract provides for a continuation of these essential services.

Purpose: The parties propose to enter into this contract for the purpose of retaining SHL to perform ambient monitoring and related services in support of the department's Air Quality Bureau.

Contractor Selection Process: The University of Iowa State Hygienic Laboratory was chosen for this project in accordance with Iowa Code 455B.103, which directs the department to contract with other State agencies for services, if possible. Iowa Code 263.7 establishes environmental investigations as an essential duty of SHL, and SHL has considerable experience and expertise in this area.

Contract History: The DNR has contracted with the University of Iowa for ambient air monitoring services for over thirty years. This contract represents ongoing services provided by SHL to the Air Quality Bureau and is renegotiated annually.

The last contract total was $2,069,228. The 1.3% increase is due to increased costs for personnel and analytical services. There are no significant changes to the scope of work during this contract period.

Sean Fitzsimmons distributed a report to the Commissioners.

Motion was made by Nancy Couser to approve the agenda item as presented. Seconded by LaQuanda Hoskins. Motion carried unanimously

APPROVED AS PRESENTED

2015 Contract with Linn County Air Quality Division: Air Pollution Control in Linn County

Christina Iiams, Program Planner of the Program Development Section of the Air Quality Bureau presented the following item.

Commission approval was requested for a one year-service contract with the county government of Linn County; Cedar Rapids, Iowa. The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $850,094. This contract is an Iowa Code Chapter 28E contract.

Funding Source:
The statutory authority for the DNR to enter into this contract is 455B.145. This contract will be funded by cost reimbursable payments from Title V program fees (not to exceed $705,942), 105 federal grant dollars (not to exceed $126,652), and 103 federal grant dollars (not to exceed $17,500). Linn County has a funding commitment of $221,165.

Background:
Under Iowa Code § 455B.134 (11) and Iowa Code § 455B.144 local political subdivisions are able to address air quality problems in their jurisdictions and can establish their own rules. Linn County had a local program, including ordinances and enforcement, in place prior to the DNR's delegation from EPA for an air program.

As specified in Iowa Code § 455B.145 and 567 Iowa Administrative Code (IAC) Chapter 27, the Linn County Air Quality Division meets the conditions necessary to retain a local program. As established under the requirements of this contract, the Linn County Air Quality Division is responsible for the ongoing implementation of an air program within their county.

Purpose:
The parties propose to enter into this contract to specify the extent and manner of cooperation between the two agencies in conducting programs for the abatement, control, and prevention of air pollution within Linn County. Particular emphasis is placed on the collection and assessment of information regarding air quality, the permitting of sources of air emissions, the enforcement of emission limits, and the attainment and maintenance of ambient air quality standards.

Contractor Selection Process:
The DNR is allowed to contract with Linn County without using a competitive selection process pursuant to state law.

Contract History:
Records indicate that DNR has been contracting with Linn County for implementation of an air program within Linn County since at least 1992. The contract is renegotiated annually with Linn County to provide services that allow for the ongoing implementation of an air program.

In comparison to last year (SFY 2014), the contract currently being requested for approval has the same scope of work. The DNR's budget contribution increased by $13,207 (Title V program fees) and Linn County's funding commitment increased by about 3.5% ($7,430). Budget increases were due primarily to personnel, fringe benefit & indirect costs.

Motion was made by Gene Ver Steeg to approve the agenda item as presented. Seconded by Chad Ingels. Motion carried unanimously

Approved as Presented

2015 Contract with Polk County Air Quality Division: Air Pollution Control in Polk County

Christina Iiams, Program Planner of the Program Development Section of the Air Quality Bureau presented the following item.

Commission approval is requested for a one year-service contract with the county government of Polk County; Des Moines, Iowa. The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $902,166. This contract is an Iowa Code Chapter 28E contract.

Funding Source:
The statutory authority for the DNR to enter into this contract is 455B.145. This contract will be funded by cost reimbursable payments from Title V program fees (not to exceed $711,128), 105 federal grant dollars (not to exceed $171,038), and 103 federal grant dollars (not to exceed $20,000). Polk County has a funding commitment of $239,836.

Background:
Under Iowa Code § 455B.134 (11) and Iowa Code § 455B.144 local political subdivisions are able to address air quality problems in their jurisdictions and can establish their own rules. Polk County had a local program, including ordinances and enforcement, in place prior to the DNR's delegation from EPA for an air program.

As specified in Iowa Code § 455B.145 and 567 Iowa Administrative Code (IAC) Chapter 27, the Polk County Air Quality Division meets the conditions necessary to retain a local program. As established under the requirements of this contract, the Polk County Air Quality Division is responsible for the ongoing implementation of an air program within their county.

Purpose:
The parties propose to enter into this contract to specify the extent and manner of cooperation between the two agencies in conducting programs for the abatement, control, and prevention of air pollution within Polk County. Particular emphasis is placed on the collection and assessment of information regarding air quality, the permitting of sources of air emissions, the enforcement of emission limits, and the attainment and maintenance of ambient air quality standards.

Contractor Selection Process:
The DNR is allowed to contract with Polk County without using a competitive selection process pursuant to state law.

Contract History:
Records indicate that DNR has been contracting with Polk County for implementation of an air program within Polk County since at least 1994. The contract is renegotiated annually with Polk County to provide services that allow for the ongoing implementation of an air program.

In comparison to last year (SFY 2014), the contract currently being requested for approval has the same scope of work. The DNR's budget contribution increased by $18,846 (Title V program fees). The majority of the budget increase ($13,846) is due to personnel & fringe benefit increases; the remaining $5,000 is for a specific training necessary for a piece of monitoring equipment.

Motion was made by LaQuanda Hoskins to approve the agenda item as presented. Seconded by Nancy Couser. Motion carried unanimously

Approved as Presented

2015 Contract University of Northern Iowa – Iowa Air Emissions Assistance Program (IAEAP): Small Business Assistance Program

Christina Iiams, Program Planner of the Program Development Section of the Air Quality Bureau presented the following item.

Commission approval was requested for a one year-service contract with the University of Northern Iowa (UNI); Cedar Falls, Iowa. Services are to be provided by the Iowa Air Emission Assistance Program (IAEAP) of UNI's Iowa Waste Reduction Center (IWRC). The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $298,507.00. This contract is an Iowa Code Chapter 28E contract.

Funding Source:
The statutory authority for the DNR to enter into this contract is under Section 507 of the Clean Air Act and Iowa Code § 455B.133(8)(a). This contract will be funded by cost reimbursable payments funded solely by Title V program fees.

Background:
The Small Business Assistance Program, which is mandated by Section 507 of the Clean Air Act Amendments of 1990, provides technical and non-technical assistance to small businesses. This contract establishes the requirements of Iowa's technical assistance program.

Purpose:
The parties propose to enter into this contract to outline UNI's activities and projects related to providing technical assistance to Iowa's small businesses. Particular emphasis is placed on providing general education and outreach to assist small businesses in determining and understanding their regulatory obligations, and training small businesses on how to complete and submit emissions inventories.

Contractor Selection Process:
The DNR is allowed to contract with the University of Northern Iowa without using a competitive selection process pursuant to state law.

Contract History:
The Iowa Air Emission Assistance Program (IAEAP) was formally designated as the technical and compliance small business assistance provider in a State Implementation Plan revision that was submitted to and approved by the EPA in the early 1990s. The University of Northern Iowa's IAEAP has demonstrated itself to be an effective assistance provider to Iowa's small businesses.

In comparison to last year (SFY 2014), the contract currently being requested for approval has primarily the same scope of work. A few changes have been made to the "special work products" section of the contract; similar to other contract years, the DNR and UNI make changes to this section based on the needs for new outreach projects or other technical projects that may need UNI's expertise and assistance. The DNR's budget contribution went up by $3,377.00 - with the budget increase being due to personnel, fringe benefit, and indirect charge increases.

Motion was made by Gene Ver Steeg to approve the agenda item as presented. Seconded by Nancy Couser. Motion carried unanimously

Approved as Presented

EXECUTIVE ORDER 80 (EO 80) STAKEHOLDER GROUP ON PERMITS FOR DIVERSION, STORAGE, AND WITHDRAWAL OF WATER FROM THE CAMBRIAN-ORDOVICIAN (JORDAN) AQUIFER

The Jordan Aquifer Water Use Permitting Stakeholder Group presented their final recommendations to the Environmental Protection Commission and the Department of Natural Resources. Todd Steigerwaldt, Chair of the Stakeholder Group, presented the information.

Governor Branstad issued Executive Order 80 (EO 80) to increase stakeholder involvement and input on administrative processes and rules. The Director, in consultation with the Governor's Office, selected a stakeholder group to make recommendations and consider the need for rulemaking to better manage the usage of the Cambrian-Ordovician Aquifer (commonly called the Jordan Aquifer) in Iowa on a more regional level. A list of the stakeholder group members is attached.

Background:
Currently, the Iowa Administrative Code (567—Chapter 50, "Scope of Division," Chapter 52, "Criteria and Conditions for Authorizing Withdrawal, Diversion and Storage of Water," and Chapter 53, "Protected Water Sources) prohibits municipal, commercial, and industrial entities from water use in the Jordan Aquifer that would lower the groundwater table by more than 200 feet from historic levels. It also limits the rate of water withdrawals for industrial use to 2,000 gallons per minute. These restrictions may not be appropriate for everyone because the characteristics of the Jordan Aquifer vary greatly across the state. For example, protecting the Jordan Aquifer from overuse may be needed in some parts of the state but may not be necessary in other locations. A rule addressing water usage of the Jordan Aquifer on a more local basis would allow additional usage of the aquifer where sufficient supply exists. It would also prevent someone from significantly investing in developing a Jordan well only later to find that the amount of water that can be withdrawn is severely limited.

The stakeholder group met on February 24, March 20, April 3, May 5, and May 16, 2014.

INFORMATION

EDUCATIONAL PRESENTATION OF GIS RESOURCES

Chris Ensminger, Supervisor of the Geographic Information Systems Section of the Land Quality Bureau provided an educational presentation of the GIS resources the Department offers.

INFORMATION

MONTHLY REPORTS

Bill Ehm shared with the Commission the following:

- The DNR Strategic Plan was included with the Commissioner packets. The Department focused on what it wanted to accomplish and the Governor's priorities. The Department wanted to keep it to one page, front and back. Bill has asked each bureau chief to put together how they fit into the Department plan. The goal was to make it more strategic as opposed to operational.
- The contracts on the agenda today are really the nuts and bolts that help the Department run its business.
- The Story County CAFO application was brought up during the public comment period. DNR Legal staff is issuing a letter today informing the County that it can request an extension but the Department will not be initiating that process.

The following monthly reports have been posted on the DNR website under the appropriate meeting month: http://www.iowadnr.gov/InsideDNR/BoardsCommissions.aspx

1. Rulemaking Status Report
2. Enforcement Status Report
3. Administrative Penalty Report
4. Attorney General Referrals Report
5. Contested Case Status Report

INFORMATION

GENERAL DISCUSSION

- Chad Ingels stated that he was disappointed about the Governor vetoing the REAP funding. The suggestion was made to include this in the annual EPC report.
- The Commissioners were wondering what is the next step regarding the Jordan Aquifer recommendations. Ed Tormey stated that the decision the Commission needs to make is whether or not rules need to be initiated by the Department. Commissioners would like to add this to the July meeting as a decision item to initiate rules per the recommendations that were presented at the June meeting.
- There was general discussion related to the EO80 stakeholder group that Chad Ingels has been participating on and what will be presented at the July meeting. Jerah Sheets will provide the web address from the stakeholder group with the Commissioner packet.

INFORMATION

Chairperson Boote adjourned the Environmental Protection Commission meeting at 2:39 p.m., Tuesday, June 17, 2014.

Chuck Gipp

Chuck Gipp, Director

Nancy Couser, Sec.

Nancy Couser, Secretary

DES MOINES WATER WORKS
Board of Water Works Trustees

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May 9, 2014

Gene Tinker
Iowa Department of Natural Resources
Wallace Building
502 East 9th Street
Des Moines, IA 50319

RE: Proposed Amendments to Iowa Administrative Code, Chapter 64 Waste Water Construction and Operation Permits, and Chapter 65 Animal Feeding Operations

Des Moines Water Works (DMWW) requests that any member of the Environmental Protection Commission (EPC) who owns or operates, directly or indirectly, an animal feeding operation or confined animal feeding operation to abstain from voting on these rules due to the direct economic effect the rules will have on them. DMWW objects to any member of the EPC with such a conflict voting on this matter.

DMWW provides safe drinking water to 500,000 central Iowans. The primary water sources are the Raccoon and Des Moines Rivers. Land use in both watersheds is overwhelmingly agricultural. Total Maximum Daily Load (TMDL) reports completed by the Iowa Department of Natural Resources on both rivers show row crops accounted for 73.2% of the land use in the Raccoon River (2008 TMDL) watershed and 78.5% of the Des Moines River (2009 TMDL) watershed. The TMDLs also reported nitrogen inputs from livestock waste alone accounted for 34,598 tons per year for the Raccoon River and 55,177 tons per year for the Des Moines River.

Much of the corn-soybean cropping system requires massive amounts of fertilizer application and constructed drainage (agricultural tile drainage) to maximize yields. Application of unlimited manure and commercial fertilizer and the ease in transport to our rivers through tile drainage has significantly degraded water quality. Manure from livestock should be managed and disposed of in a manner that does not pollute surface water. Management includes all sources of manure, whether feedlot run-off, onsite manure storage or the disposal of manure by land application.

While nitrate is a primary drinking water concern, other aspects of high nutrient loads challenge water treatment, increase the cost of treatment to consumers, and threatens public health. DMWW has invested millions of dollars in nitrate removal technologies, operational facilities and operational strategies to cope with nitrate levels in our rivers that continue to trend upward (Attachment A). Episodes of high levels of ammonia and algae blooms are increasing in frequency. Ammonia interferes with drinking water disinfection, requiring increased treatment levels of chlorine (Attachment B) which contributes to elevated levels of disinfection by-products. Algae blooms cause taste and odor concerns and increase the cost of operation and maintenance (Attachment C).

The focus of this rulemaking is not on the regulation of livestock, but is on how water quality will be improved and protected from the *impact of untreated livestock waste*. DMWW believes the intent of the Environmental Protection Agency (EPA) livestock regulations is to be considered the base or minimum level of regulation. EPA Technical Standards, Regulator Guidelines and Producer Compliance Guide are all considered guidance documents. From that base level of regulation, states should develop rules relative to their own livestock demographics and watershed conditions and capacities. As the agricultural community regularly and adamantly expresses, one size does not fit all. The base guidance provided by EPA is where Iowa's rulemaking should begin and include consideration of conditions such as the type, size, location, and concentration of livestock facilities as well as the unique factors of local watershed conditions such as drainage.

The Iowa Department of Natural Resources (IDNR) is the repository of manure management plans and should be required to track the amount of manure and commercial fertilizer applied within a watershed. It is vital to nutrient management to know a watershed's nutrient treatment capacity. For example, is there enough land within the watershed to allow the application, at appropriate agronomic rates, of all manure generated in the same watershed without degradation of water quality? With improved technology, the state should be able to monitor whether manure and commercial fertilizers are being duplicated on the same parcel of land. Tracking all sources of fertilizer application will also provide the baseline by which to measure progress toward reducing nutrients by 45% as outlined in the Iowa Nutrient Reduction Strategy (INRS). 40 C.F.R. § 122.4 (i) Prohibitions – gives states the ability to not issue a permit if "…the conditions cannot insure compliance with applicable water quality requirements". If a watershed is over its capacity to adequately process nutrient loads generated in the watershed, new or expanding facilities should be prohibited unless treatment solutions are implemented that address degradation of water quality in the watershed.

Compliance with these rules as proposed will not ensure water quality improvement, compliance with applicable water quality standards, or reduce nutrients by 45%. **The Environmental Protection Commission (EPC) should not adopt these rules that only reference compliance with minimum federal regulations**. By only referencing federal code, these proposed rules do not address how Iowa will work to achieve or meet specific regulatory criteria.

DMWW recommends increased restrictions on 1) application of manures in all forms to agricultural land by increasing set-backs from rivers and tile inlets, 2) application on snow or frozen ground and 3) on nitrate fixing plants. Some level of ammonia can be attributed to natural occurring processes, but the level DMWW has had to treat in recent episodes is significantly greater than what is naturally occurring. To reduce high levels of ammonia, the application of manure or fertilizer in any form should not be allowed on frozen or snow covered land. Application of nutrients on nitrate fixing plants such as soybeans should not be allowed. In a presentation by Chris Jones, Iowa Soybean Association, at the 2014 On-Farm Network Conference (February 20, 2014), it was indicated the movement of water is greater under soybeans and therefore the transport of nitrate is more efficient. He stated, "(Agriculture) needs to manage soybeans in a way that lessens the more efficient transport of nitrate."

Rainwater and groundwater are not contaminants, but merely the conduit by which contaminants are transported. Managing livestock waste should include how the producer will prevent the transport of waste during rainfall events and through drainage.

Approval of this rulemaking is accepting water quality status quo. With federal regulations as minimal requirements, they afford Iowa the opportunity to regulate animal feeding operations (AFO) and confined animal feeding operations (CAFO) to the degree by which water quality standards can be met. The Iowa Departments of Agriculture and Land Stewardship and Natural Resources has published and vigorously support the INRS goal of reducing nutrients by 45%. **The EPC should not adopt these rules until it is demonstrated how water quality will improve, water quality standards will be met, and what measures and outcomes will achieve the 45% nutrient reduction goal in the INRS.**

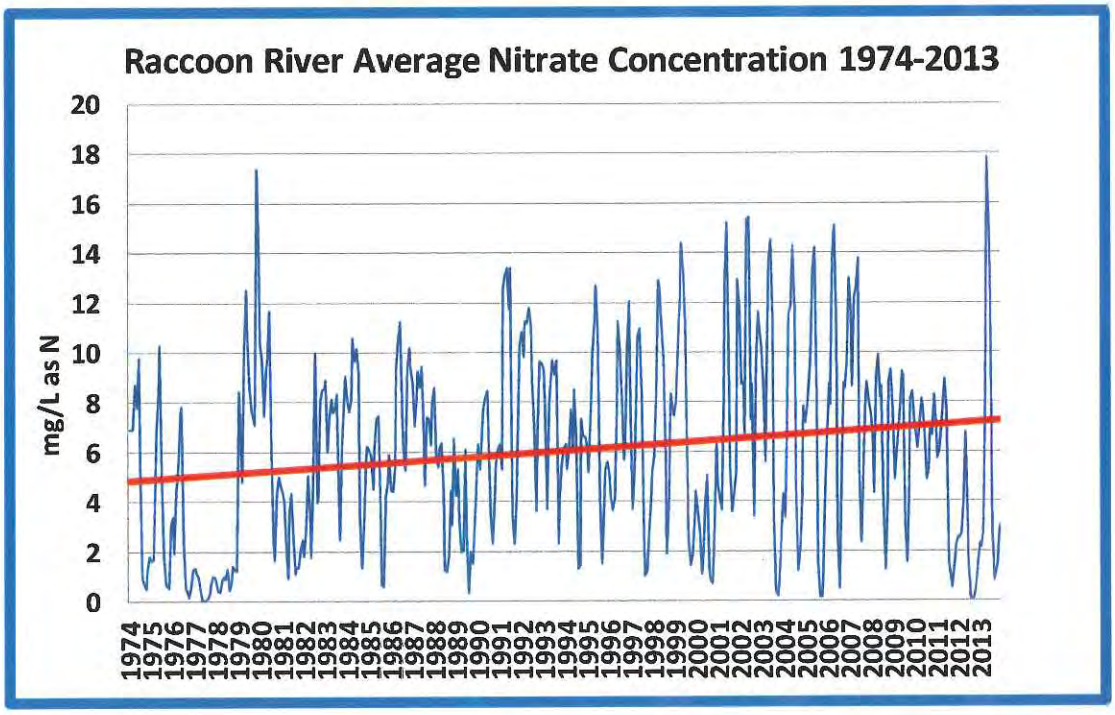
Current conservation practices, voluntary implementation of practices, the lack of numeric nutrient standards and now minimal permitting of handlers of vast amounts of animal waste will not protect, much less improve, water quality for drinking water and recreational activities. DMWW has permits to use the Des Moines and Raccoon Rivers as raw water sources for drinking water. There should be a reasonable expectation on behalf of DMWW that the quality of the source water in the Des Moines and Raccoon Rivers is treatable for human consumption, and if the quality of source waters is degraded to the extent they are not usable, fines should be levied on those contributing to the impairment. We reiterate that the EPC should not approve the proposed rules and that the IDNR should be directed to set nutrient standards by watershed and redraft the rules to include how the standards are to be achieved. The EPC should further direct the IDNR to fully engage the drinking water industry in setting regulations that will protect drinking water sources.

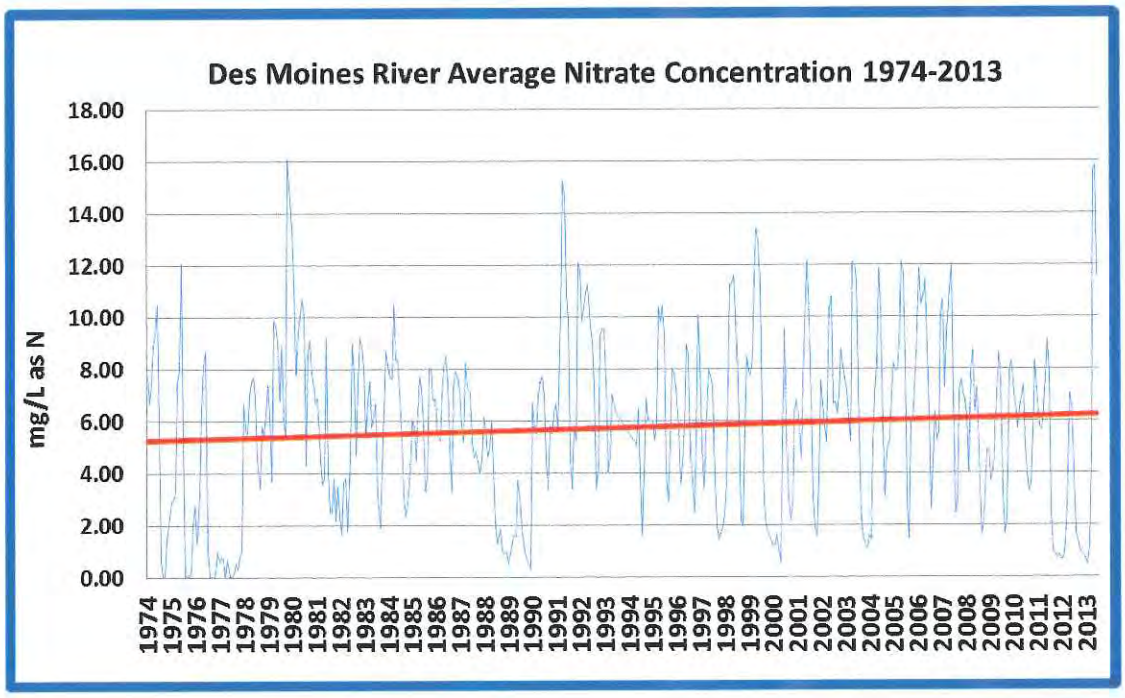
Respectfully submitted,

William G. Stowe
CEO and General Manager

ATTACHMENT A

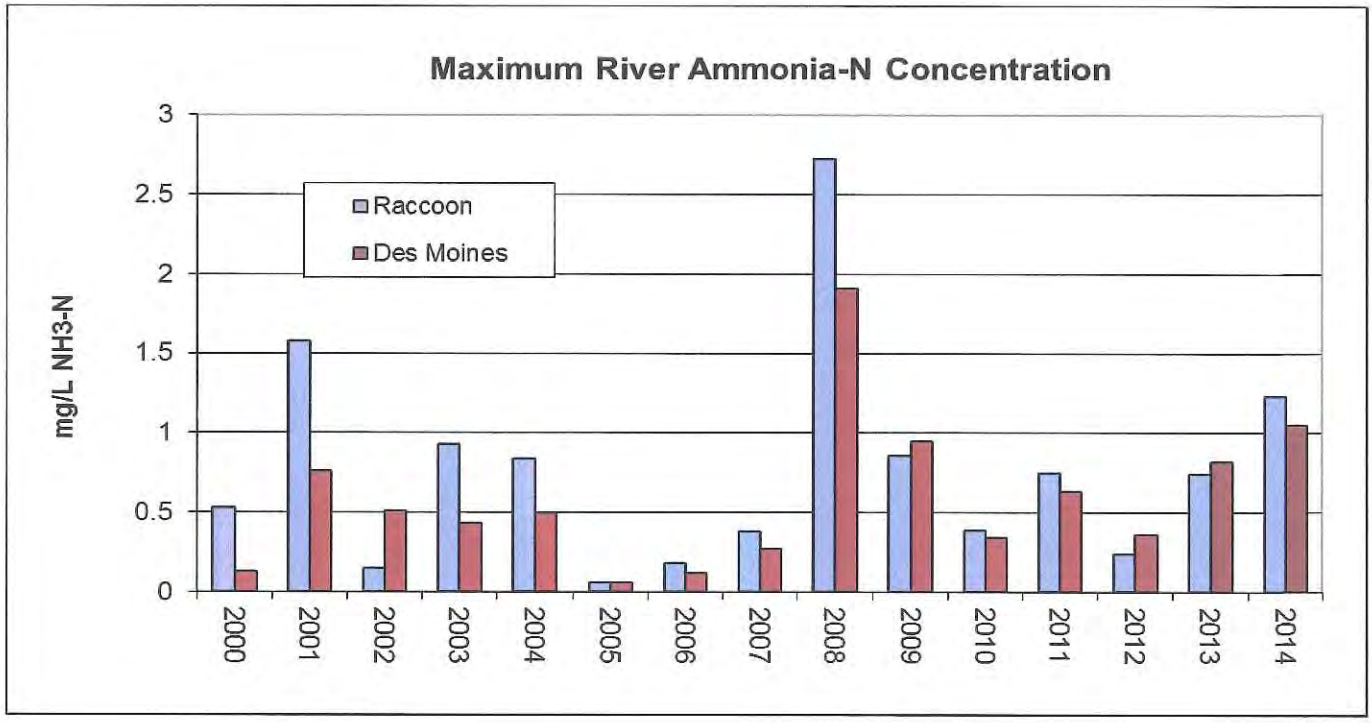
Nitrate Trend





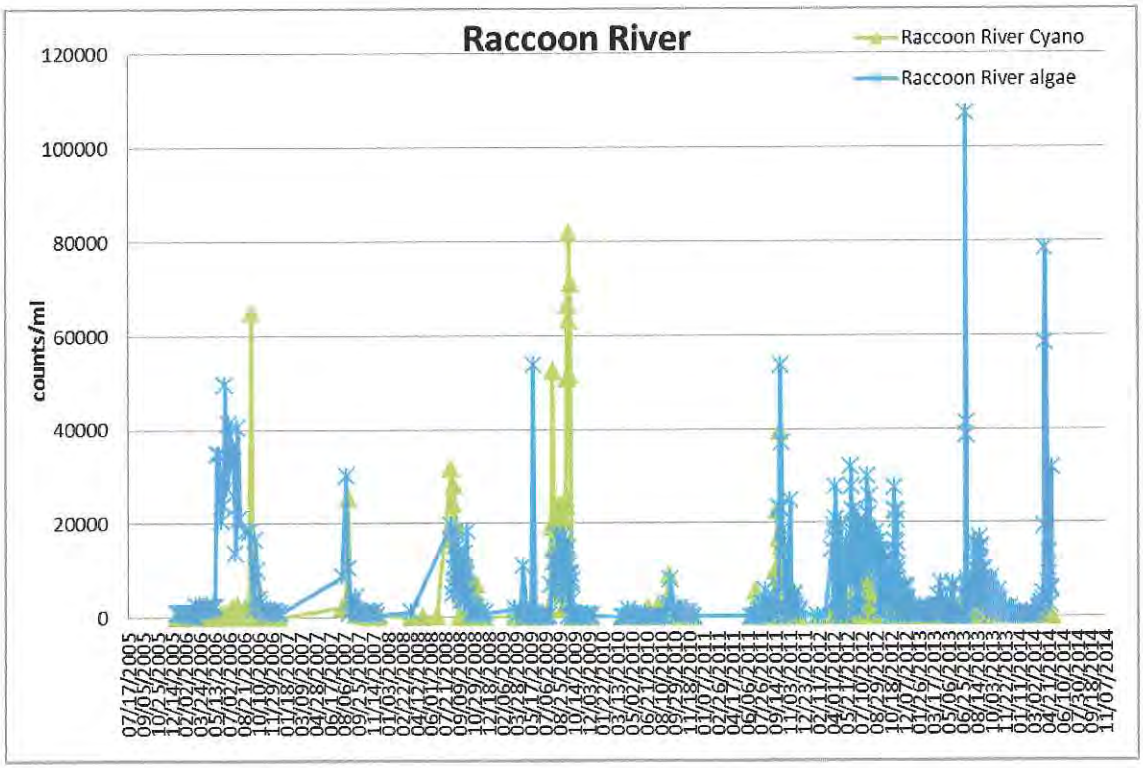
ATTACHMENT B

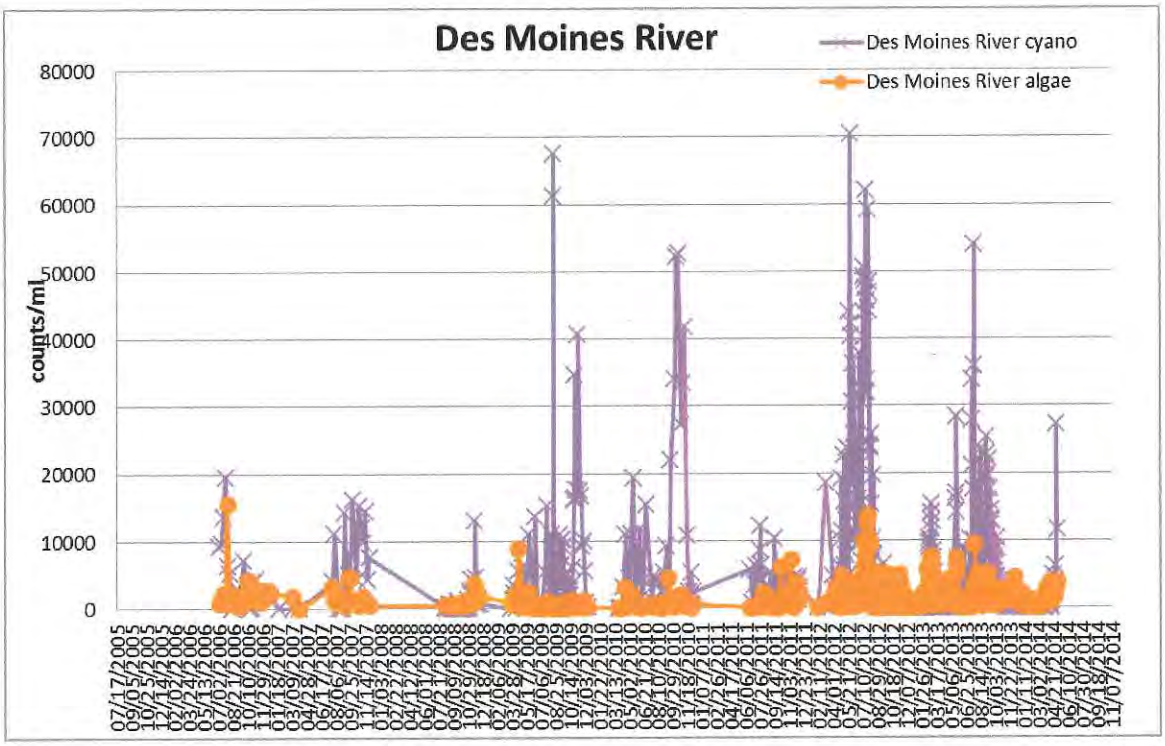
Ammonia Episodes



ATTACHMENT C

Algae Blooms – Cyanobacteria





Date: June 11, 2014
From: Chuck Gipp, Director Iowa Department of Natural Resources
Re: Solicitation of Members for the Air Quality Stakeholder Group

I would like to invite you, or a representative of your company or organization, to consider applying to participate as a member of the Air Quality Stakeholder Group. The Iowa General Assembly directed the DNR (House File 2473) to convene a **stakeholder group for the purposes of studying the funding of the air quality programs** administered by the department. Stakeholder group members will develop recommendations for funding the air quality program for next year and beyond. The department is tasked with submitting a written report to the General Assembly regarding the findings and recommendations of the stakeholder group by December 1, 2014.

I plan to form a diverse stakeholder group that will represent a broad selection of those who use air quality bureau services including: small and large businesses, associations, local governments, non-governmental organizations, and the general public. Prospective participants should be willing to commit time to participate in three to five stakeholder meetings from July through October of this year. **The first meeting of the Air Quality Stakeholder Group will be on July 17th from 10:00 am – 3:00 pm.**

Please send a letter of interest to me (attn.: Jim McGraw, by mail or e-mail) at the address below by June 20, 2014. In your letter please identify the company, association, or organization (if any) you will be representing. Within your organization please select one primary participant and one alternate and include this information in your letter. Please include your name, address, phone numbers, and e-mail address. Participants will be announced by early July. Please contact Jim McGraw if you have any questions.

Director Chuck Gipp
Attn.: Jim McGraw
Iowa Department of Natural Resources
7900 Hickman Road, Ste 1
Windsor Heights, IA 50324
jim.mcgraw@dnr.iowa.gov
(515) 725-9543

Thank you for your time and consideration,

Chuck Gipp
Director, Iowa Department of Natural Resources

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Iowa Ambient Air Monitoring Annual Network Report: 2013

Iowa Department of Natural Resources - Air Quality Bureau – Ambient Air Monitoring Group

Introduction

The purpose of this review is to compare the maximum values of ambient air monitoring data gathered in the state of Iowa during 2013 to the level of the National Ambient Air Quality Standards (NAAQS) established by the Environmental Protection Agency (EPA). The EPA has established NAAQS for seven "criteria" pollutants: particulate matter with a diameter less than 10 microns (PM_{10}), particulate matter with a diameter less than 2.5 microns ($PM_{2.5}$), sulfur dioxide (SO_2), ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO) and lead. Continuous monitoring methods have been approved by EPA for all criteria pollutants except lead. Filter samplers and laboratory filter weighing procedures have been approved by EPA for $PM_{2.5}$ and PM_{10}. All data summarized in this review was obtained using methods that are currently approved by EPA for NAAQS comparisons.

This report is divided into two parts. The first part is an executive summary, indicating where exceedances of the NAAQS were measured in Iowa during 2013. A more comprehensive review, which includes the location and summary data for each monitor in the network, is included in the second part.

Gaseous pollutant monitors (ozone, nitrogen dioxide, sulfur dioxide, and carbon monoxide) provide hourly values and operate 24 hours a day, seven days a week. Most ozone monitors are operated only when ozone levels are highest, from April through October. The ozone monitor located at the multi-pollutant site in Davenport operates year-round to establish ozone trends in cooler temperatures. Particulate filter samplers run for 24 hours at a time and collect one filter per day. Most PM_{10} and $PM_{2.5}$ filter based monitors are operated at a sampling frequency of one sample every third day. Some particulate monitoring sites are run at frequencies greater than this nominal frequency if they are located in highly populated areas, near pollution sources or if pollutant levels are close to health standards. On March 18, 2013, EPA's new annual PM2.5 standard became effective. All annual PM2.5 data in this report is compared to the new standard. This difference needs to be considered when comparing previous *Iowa Ambient Air Monitoring Reports*.

Incomplete data may skew the summary statistics for a monitor. In order to alert the reader to incomplete data problems, data completeness statistics have been provided for each monitor. If a monitor collected all of the scheduled samples, then it has an associated data completeness of 100%. If quarterly data capture falls below 75% in any quarter of the year, then the data set may not adequately capture the seasonal variability of the data. In these cases, the bar representing the comparison of the monitor data to the NAAQS is checkered.

In 2013 there were 83 NAAQS exceedances in the state of Iowa. Fourteen of the exceedances were associated with the 24-hour $PM_{2.5}$ standard, one was associated with the 24-hour PM_{10} standard and 67 were exceedances of the 1-hour sulfur dioxide standard. All of these exceedances are detailed in this report.

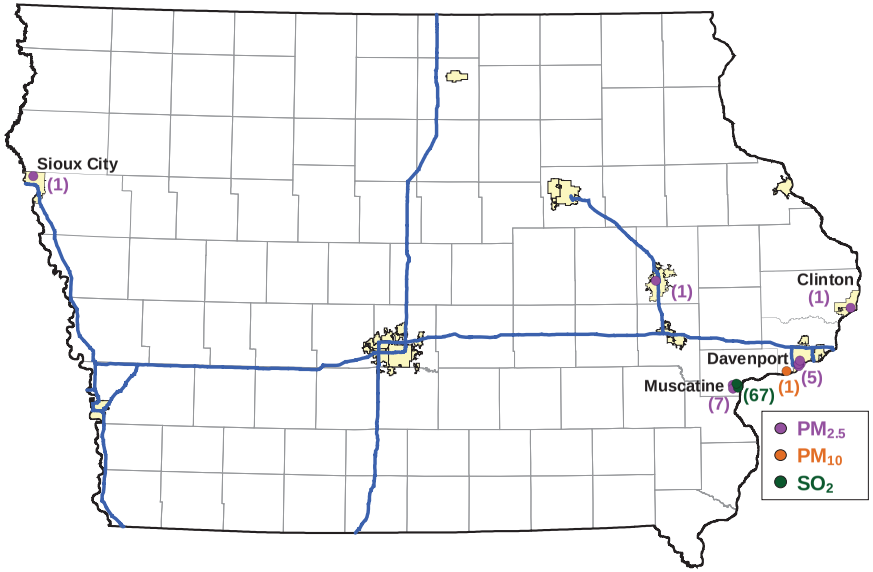
Data used to create this report were gathered by three organizations under contract with the Iowa Department of Natural Resources: the State of Iowa Hygienic Laboratory, the Linn County Public Health Department, and the Polk County Public Works Air Quality Division. Contract funds were provided by US EPA, the Iowa legislature, and regulated industry. Air pollution data for Iowa and all other states are available online at: http://www.epa.gov/airdata/. Additional information on the NAAQS is available at: http://www.epa.gov/air/criteria.html.

Exceedances of National Ambient Air Quality Standards (NAAQS) in 2013

Pollutant	Averaging Period	Exceedance Level	Units	Number of Exceedances
Ozone	8hr	76	ppb	0
PM2.5	24hr	35.5	Micrograms per cubic meter	15
	Annual	12.05	Micrograms per cubic meter	0
PM10	24hr	155	Micrograms per cubic meter	1
Sulfur dioxide	1hr	75.5	ppb	67
	3hr	0.55	ppm	0
Carbon monoxide	1hr	35.5	ppm	0
	8hr	9.5	ppm	0
Nitrogen dioxide	Annual	0.0535	ppm	0
	1hr	100.5	ppb	0
Lead	Rolling 3-month average	0.155	micrograms per cubic meter	0

*NAAQS Exceedance Counts at Iowa Monitoring Sites During 2013

(Values for individual sites indicated in parentheses)



$PM_{2.5}$ NAAQS Exceedances Measured in 2013

(15 $PM_{2.5}$ Exceedances Recorded in 2013)

Monitoring Site	Site ID	Exceedance Date	Concentration (µg/m^3)
Bryant Elementary	191930019	2/24/13	43.5
Muscatine High E. Campus-Rooftop	191390015	3/4/13	47.3
Muscatine High E. Campus-Rooftop	191390015	3/17/13	40.1
Muscatine High E. Campus-Rooftop	191390015	5/26/13	39.0
Muscatine High E. Campus-Rooftop	191390015	12/2/13	39.8
Davenport, Jefferson School	191630015	12/2/13	38.5
Davenport, Blackhawk Foundry	191630019	12/2/13	40.3
Muscatine High E. Campus-Rooftop	191390015	12/3/13	38.0
Davenport, Blackhawk Foundry	191630019	12/3/13	39.6
Davenport, Hayes Elementary	191630020	12/3/13	38.6
Davenport, Adams Elementary	191630018	12/3/13	35.7
Muscatine, Franklin School	191390018	12/3/13	36.5
Muscatine, Greenwood Cemetery	191390016	12/3/13	35.6
Cedar Rapids, Public Health	191130040	12/3/13	43.2
Clinton, Chancy Park	190450021	12/3/13	37.4

PM_{10} NAAQS Exceedances Measured in 2013

(1 PM_{10} Exceedance Recorded in 2013)

Monitoring Site	Site ID	Exceedance Date	Concentration (µg/m^3)
Linwood Mining	191630017	9/27/13	156.0

SO_2 NAAQS Exceedances in 2013

(67 SO_2 Exceedances Recorded in 2013; all recorded at Muscatine sites)

Date	Greenwood Cemetery (ppb)	Muscatine High E. Campus-Trailer (ppb)	Musser Park (ppb)
1/8/13			100.8
1/10/13		92.2	
1/11/13			145.8
2/10/13			119.1
3/3/13		139.2	
3/4/13		157.7	
3/7/13		156.9	
3/8/13		110	
3/17/13		112.8	
3/22/13		136	
4/5/13		146.8	
4/6/13			90.8
4/7/13		222.5	
4/14/13	94.3	109.8	178.5
4/20/13		95.2	
4/22/13			143.8
4/26/13			75.7
4/29/13	106.5		132.2
4/30/13			88.6
5/13/13			96.6
5/14/13			101.5
5/17/13		90.9	87
5/19/13			79.4
5/27/13		75.7	
5/29/13			188.5
5/30/13	104.8		237.1
5/31/13			133.1
6/4/13		198.6	
6/5/13		109.8	

Date	Greenwood Cemetery (ppb)	Muscatine High E. Campus-Trailer (ppb)	Musser Park (ppb)
6/9/13			96.2
6/14/13		86.6	
6/20/13	83.7		
6/21/13		122.3	94.6
6/22/13			159
7/13/13		91.6	
7/29/13		95.8	
8/17/13		164.8	
8/20/13			102.5
8/25/13			150.5
9/3/13		160.9	77.2
9/6/13		96.2	102.7
9/8/13		146.6	
9/17/13		109.4	
9/23/13		110	
9/24/13		88.5	
9/27/13			94.8
9/28/13			149.9
9/30/13			76.5
10/3/13			99.8
10/4/13			81.4
10/11/13	81.9		129.3
10/12/13			90.3
10/14/13		138	
11/4/13			155.6
11/5/13			111.4
11/8/13			131.1
11/16/13			184.4
12/2/13		125.1	

2013 Ambient Monitoring Network Changes

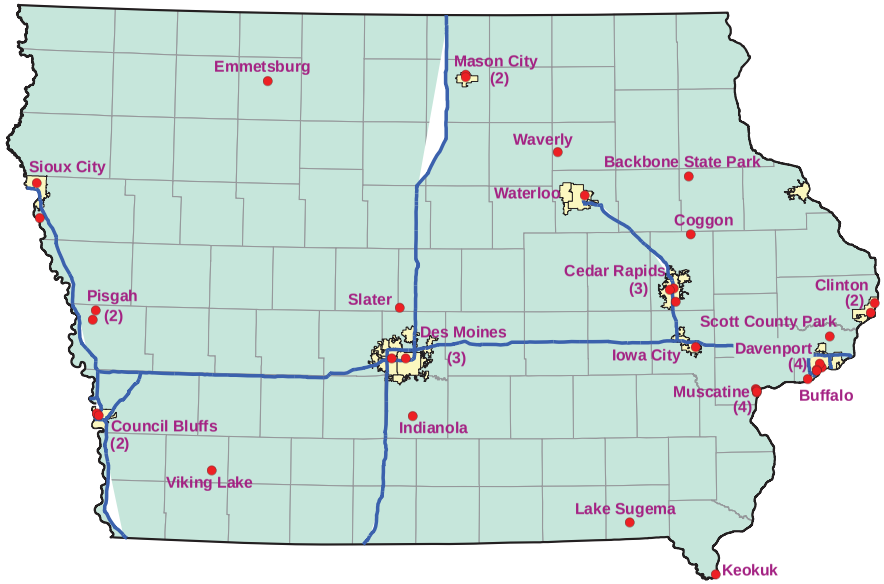
Sites Added During 2013

Site	Name	City	County	Site Label	Start Date	Pollutants
191536001	Near Road NO2	Des Moines	Polk	Rollins Near Road NO2	1/1/2013	NO2

2013 Ambient Monitoring Network

Site ID	Name	City	Address	County	Site Label	Pollutants
190130009	Water Tower	Waterloo	Vine St. & Steely	Black Hawk	Waterloo, Water Tower	PM10, PM2.5
190170011	Waverly Airport	Waverly	Waverly Airport	Bremer	Waverly, Airport	Ozone
190330018	Holcim Cement	Mason City	17th St. & Washington St.	Cerro Gordo	Mason City, Holcim Cement	PM10
190330020	Washington School	Mason City	700 N. Washington Avenue	Cerro Gordo	Mason City, Washington Sch.	PM10
190450019	Chancy Park	Clinton	23rd & Camanche	Clinton	Clinton, Chancy Park	PM2.5, SO2
190450021	Rainbow Park	Clinton	Roosevelt St.	Clinton	Clinton, Rainbow Park	Ozone, PM2.5
190550001	Backbone State Park	not in a city	Fish Hatchery Backbone State Park	Delaware	Backbone State Park	PM10, PM2.5
190850007	Forestry Office	Pisgah	206 Polk St.	Harrison	Pisgah, Forestry Office	Ozone
190851101	Highway Maintenance Shed	Pisgah	1575 Hwy 183	Harrison	Pisgah, Highway Maintenance	Ozone
191032001	Hoover Elementary	Iowa City	2200 East Court	Johnson	Iowa City, Hoover Sch.	PM10, PM2.5
191110008	Fire Station	Keokuk	111S. 13th St.	Lee	Keokuk, Fire Station	PM2.5
191130028	Kirkwood College	Cedar Rapids	6301 Kirkwood Blvd SW (Iowa Hall)	Linn	Cedar Rapids, Kirkwood Coll.	Ozone
191130031	Scottish Rite Temple	Cedar Rapids	616 A Ave.	Linn	Cedar Rapids, Scottish Rite Temple	SO2
191130033	Coggon Elementary School	Coggon	408 E Linn St.	Linn	Coggon, Coggon Sch.	Ozone
191130040	Public Health	Cedar Rapids	500 11th St. NW	Linn	Cedar Rapids, Public Health	CO, SO2, Ozone, PM10, PM2.5
191370002	Viking Lake State Park	not in a city	2780 Viking Lake Road	Montgomery	Viking Lake State Park	Ozone, PM10, PM2.5
191390015	Muscatine High E. Campus-Rooftop	Muscatine	1409 Wisconsin	Muscatine	Muscatine, Muscatine High E. Campus-Rooftop	PM10, PM2.5
191390016	Greenwood Cemetery	Muscatine	Fletcher St. & Kimble St.	Muscatine	Muscatine, Greenwood Cemetery	PM2.5, SO2
191390018	Franklin School	Muscatine	210 Taylor St.	Muscatine	Muscatine, Franklin Sch.	PM2.5
191390019	Muscatine High E. Campus-Trailer	Muscatine	1409 Wisconsin	Muscatine	Muscatine, Muscatine High E. Campus-Trailer	SO2
191390020	Musser Park	Muscatine	Oregon St. & Earl Ave.	Muscatine	Muscatine, Musser Park	PM2.5, SO2
191471002	Iowa Lakes College	Emmetsburg	Iowa Lakes Community College - S Camp	Palo Alto	Emmetsburg, Iowa Lakes Coll.	Ozone, PM10, PM2.5
191530030	Health Department	Des Moines	1907 Carpenter	Polk	Des Moines, Health Dept.	CO, NO2, SO2, Ozone, PM10, PM2.5
191532510	Indian Hills Jr. High School	Clive	9401 Indian Hills	Polk	Clive, Indian Hills Jr. High Sch.	PM10, PM2.5
191536011	Rollins Ave	Des Monies	6011 Rollins Ave	Polk	Des Moines, Rollins Ave	NO2
191550009	Franklin School	Council Bluffs	3130 C Ave.	Pottawattamie	Council Bluffs, Franklin Sch.	PM10, PM2.5
191550011	Griffin Pipe	Council Bluffs	8th Avenue and 27th St	Pottawattamie	Council Bluffs, Griffin Pipe	Pb
191630014	Scott County Park	Davenport	Scott County Park	Scott	Scott County Park	Ozone
191630015	Jefferson School	Davenport	10th St. & Vine St.	Scott	Davenport, Jefferson Sch.	CO, NO2, SO2, Ozone, PM10, PM2.5
191630017	Linwood Mining	Buffalo	11100 110th Ave.	Scott	Buffalo, LW Mining	PM10
191630018	Adams School	Davenport	3029 N Division St.	Scott	Davenport, Adams Sch.	PM10, PM2.5
191630019	Blackhawk Foundry	Davenport	300 Wellman St.	Scott	Davenport, Blackhawk Foundry	PM10, PM2.5
191630020	Hayes School	Davenport	622 South Concord St	Scott	Davenport, Hayes Elementary	PM2.5
191690011	City Hall	Slater	105 Greene	Story	Slater, City Hall	Ozone
191770006	Lake Sugema	not in a city	24430 Lacey Trl, Keosauqua Lake Sugema	Van Buren	Keosauqua, Lake Sugema	NO2, Ozone, SO2, PM10, PM2.5
191910022	Lake Ahquabi State Park	Indianola	1650 118th Ave.	Warren	Indianola, Lake Ahquabi	Ozone
191930019	Bryant School	Sioux City	821 30th St.	Woodbury	Sioux City, Bryant Sch.	PM10, PM2.5
191930020	George Neal North	Sergeant Bluff	1221 260th St, Sergeant Bluff, IA	Woodbury	Sergeant Bluff, George Neal North	SO2

2013 Monitoring Site Locations (38)



Monitoring Locations in Cedar Rapids

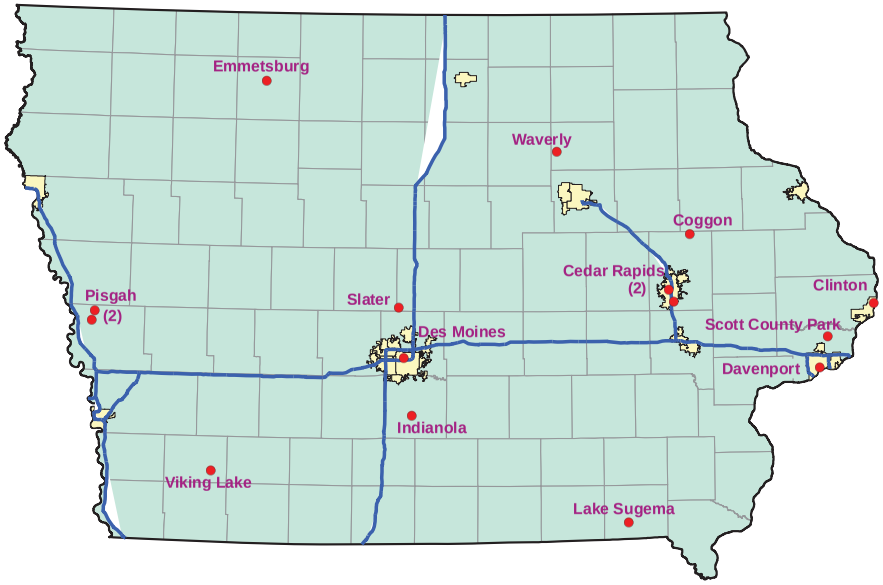
Monitoring Locations in Davenport

Monitoring Locations in Des Moines/Clive

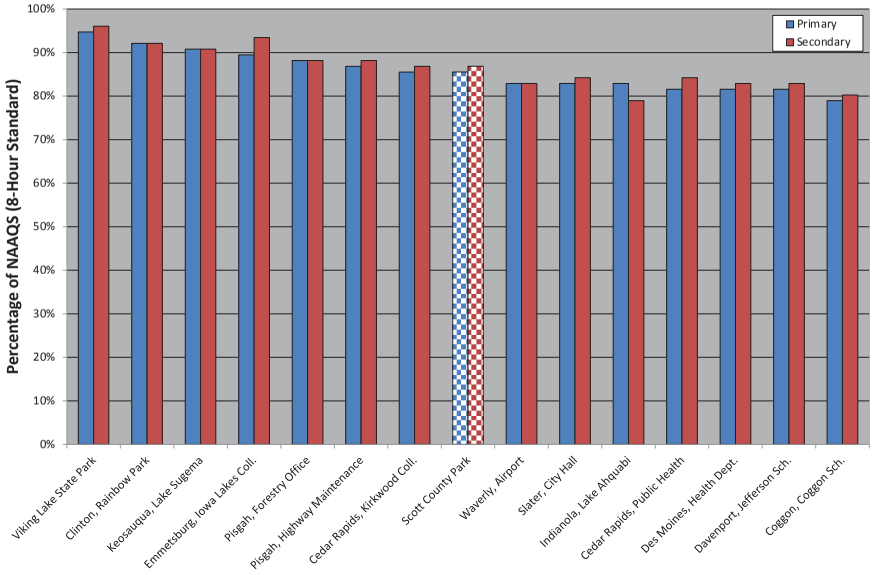
Ozone Monitoring Sites

Site	Name	City	County	Site Label
190170011	Waverly Airport	Waverly	Bremer	Waverly, Airport
190450021	Rainbow Park	Clinton	Clinton	Clinton, Rainbow Park
190850007	Forestry Office	Pisgah	Harrison	Pisgah, Forestry Office
190851101	Highway Maintenance Shed	Pisgah	Harrison	Pisgah, Highway Maintenance
191130028	Kirkwood College	Cedar Rapids	Linn	Cedar Rapids, Kirkwood Coll.
191130033	Coggon Elementary School	Coggon	Linn	Coggon, Coggon Sch.
191130040	Public Health	Cedar Rapids	Linn	Cedar Rapids, Public Health
191370002	Viking Lake State Park	not in a city	Montgomery	Viking Lake State Park
191471002	Iowa Lakes College	Emmetsburg	Palo Alto	Emmetsburg, Iowa Lakes Coll.
191530030	Health Department	Des Moines	Polk	Des Moines, Health Dept.
191630014	Scott County Park	Davenport	Scott	Scott County Park
191630015	Jefferson School	Davenport	Scott	Davenport, Jefferson Sch.
191690011	City Hall	Slater	Story	Slater, City Hall
191770006	Lake Sugema	not in a city	Van Buren	Keosauqua, Lake Sugema
191810022	Lake Ahquabi State Park	Indianola	Warren	Indianola, Lake Ahquabi

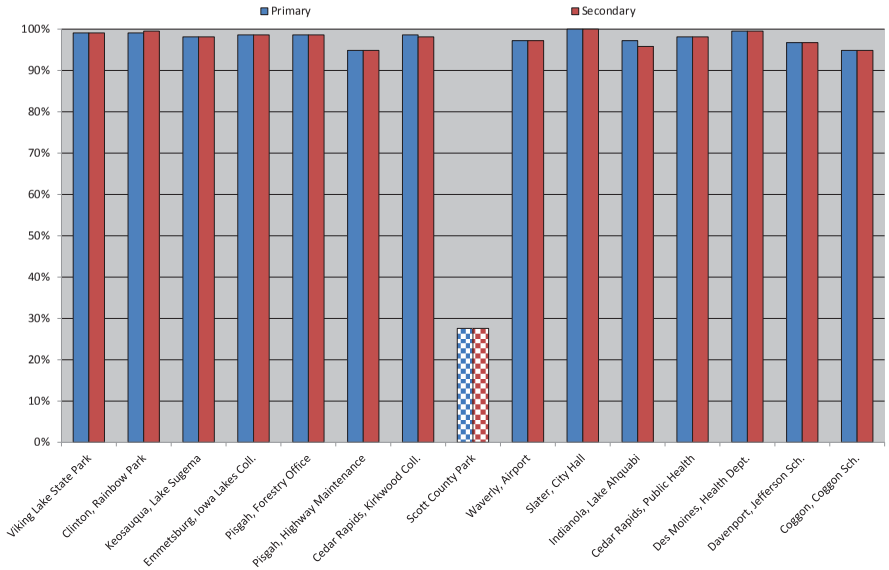
Ozone Monitoring Locations



Comparison of 2013 Ozone Data with National Ambient Air Quality Standards



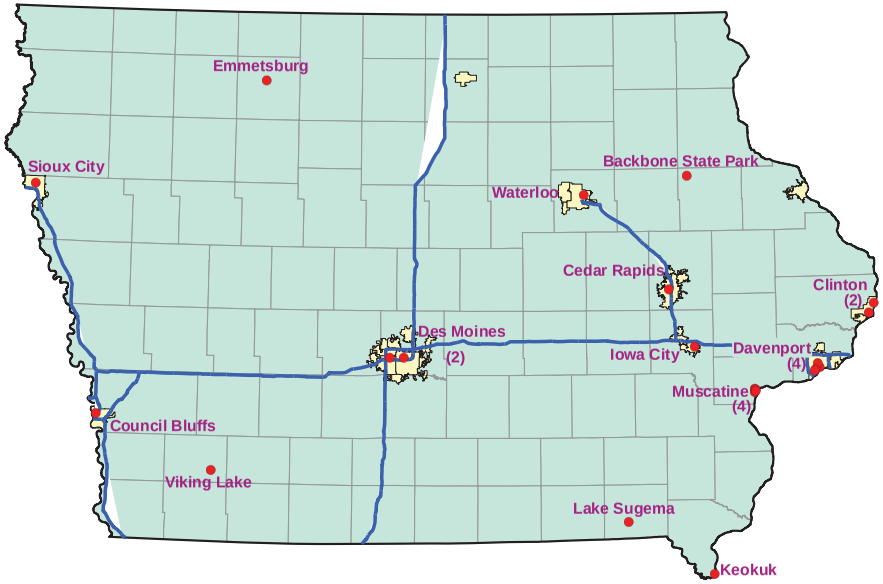
2013 Data Completeness – Ozone



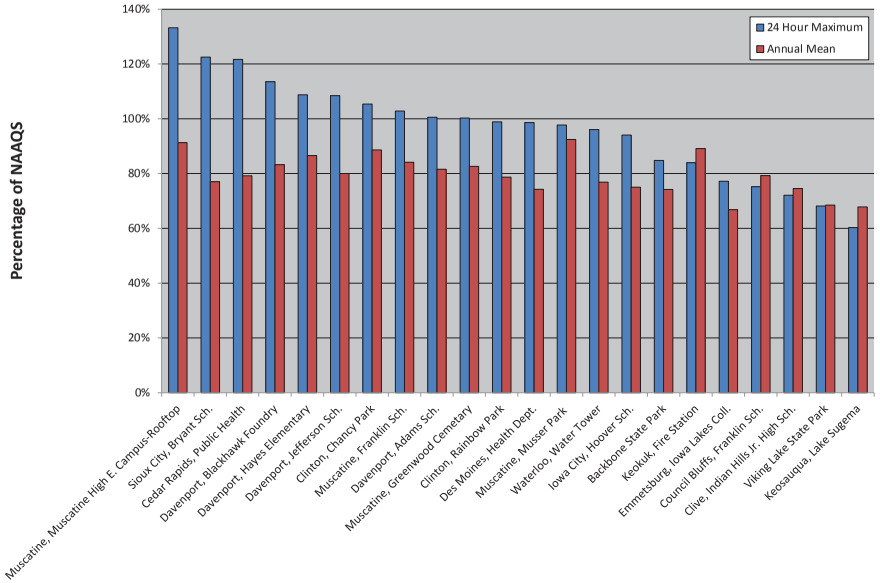
$PM_{2.5}$ Monitoring Sites

Site	Name	City	County	Site Label
190130009	Water Tower	Waterloo	Black Hawk	Waterloo, Water Tower
190450019	Chancy Park	Clinton	Clinton	Clinton, Chancy Park
190450021	Rainbow Park	Clinton	Clinton	Clinton, Rainbow Park
190550001	Backbone State Park	not in a city	Delaware	Backbone State Park
191032001	Hoover Elementary	Iowa City	Johnson	Iowa City, Hoover Sch.
191110008	Fire Station	Keokuk	Lee	Keokuk, Fire Station
191130040	Public Health	Cedar Rapids	Linn	Cedar Rapids, Public Health
191370002	Viking Lake State Park	not in a city	Montgomery	Viking Lake State Park
191390015	Muscatine High E. Campus-Rooftop	Muscatine	Muscatine	Muscatine, Muscatine High E. Campus-Rooftop
191390016	Greenwood Cemetery	Muscatine	Muscatine	Muscatine, Greenwood Cemetery
191390018	Franklin School	Muscatine	Muscatine	Muscatine, Franklin Sch.
191390020	Musser Park	Muscatine	Muscatine	Muscatine, Musser Park
191471002	Iowa Lakes College	Emmetsburg	Palo Alto	Emmetsburg, Iowa Lakes Coll.
191530030	Health Department	Des Moines	Polk	Des Moines, Health Dept.
191532510	Indian Hills Jr. High School	Clive	Polk	Clive, Indian Hills Jr. High Sch.
191550009	Franklin School	Council Bluffs	Pottawattamie	Council Bluffs, Franklin Sch.
191630015	Jefferson School	Davenport	Scott	Davenport, Jefferson Sch.
191630018	Adams School	Davenport	Scott	Davenport, Adams Sch.
191630019	Blackhawk Foundry	Davenport	Scott	Davenport, Blackhawk Foundry
191630020	Hayes School	Davenport	Scott	Davenport, Hayes Elementary
191770006	Lake Sugema	not in a city	Van Buren	Keosauqua, Lake Sugema
191930019	Bryant School	Sioux City	Woodbury	Sioux City, Bryant Sch.

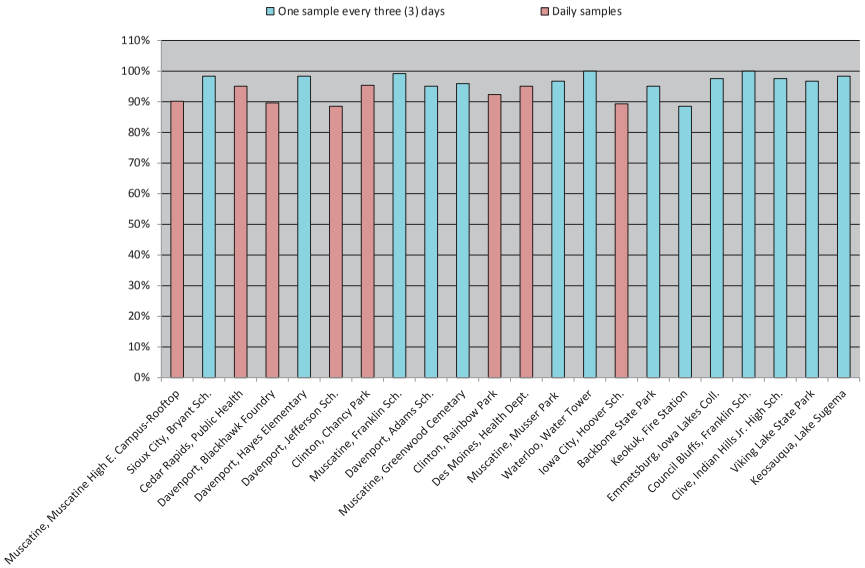
$PM_{2.5}$ Monitoring Locations



Comparison of 2013 $PM_{2.5}$ Data with National Ambient Air Quality Standards



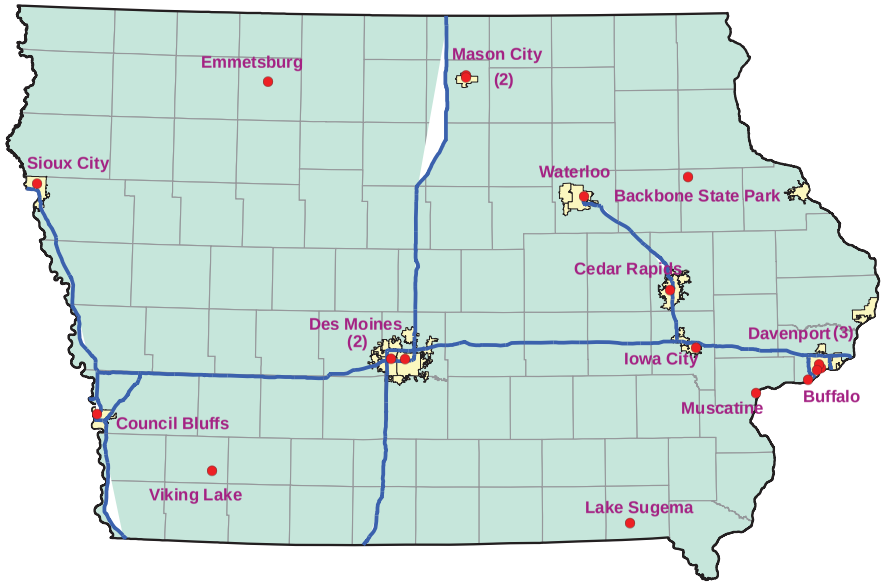
2013 Data Completeness – $PM_{2.5}$



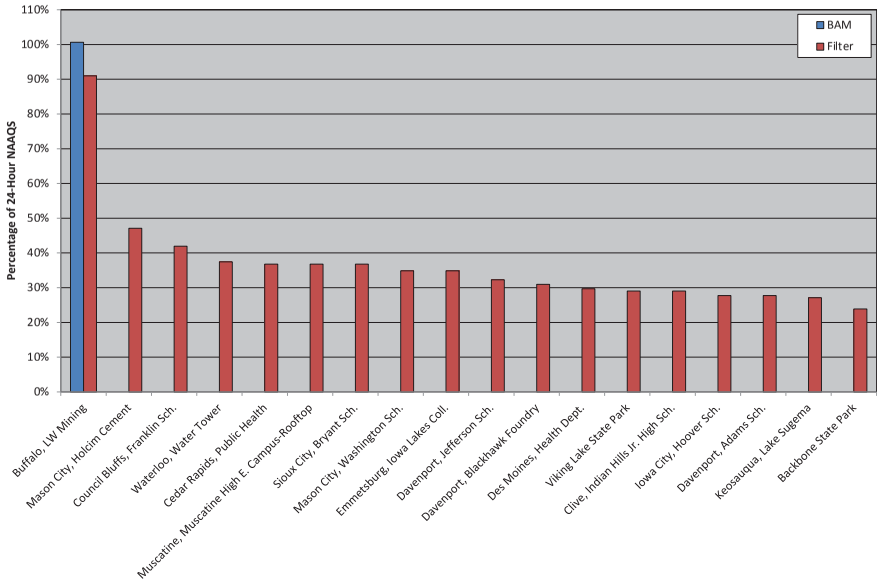
PM_{10} Monitoring Sites

Site	Name	City	County	Site Label
190130009	Water Tower	Waterloo	Black Hawk	Waterloo, Water Tower
190330018	Holcim Cement	Mason City	Cerro Gordo	Mason City, Holcim Cement
190330020	Washington School	Mason City	Cerro Gordo	Mason City, Washington Sch.
190550001	Backbone State Park	not in a city	Delaware	Backbone State Park
191032001	Hoover Elementary	Iowa City	Johnson	Iowa City, Hoover Sch.
191130040	Public Health	Cedar Rapids	Linn	Cedar Rapids, Public Health
191370002	Viking Lake State Park	not in a city	Montgomery	Viking Lake State Park
191390015	Muscatine High E. Campus-Rooftop	Muscatine	Muscatine	Muscatine, Muscatine High E. Campus-Rooftop
191471002	Iowa Lakes College	Emmetsburg	Palo Alto	Emmetsburg, Iowa Lakes Coll.
191530030	Health Department	Des Moines	Polk	Des Moines, Health Dept.
191532510	Indian Hills Jr. High School	Clive	Polk	Clive, Indian Hills Jr. High Sch.
191550009	Franklin School	Council Bluffs	Pottawattamie	Council Bluffs, Franklin Sch.
191630015	Jefferson School	Davenport	Scott	Davenport, Jefferson Sch.
191630017	Linwood Mining	Buffalo	Scott	Buffalo, LW Mining
191630018	Adams School	Davenport	Scott	Davenport, Adams Sch.
191630019	Blackhawk Foundry	Davenport	Scott	Davenport, Blackhawk Foundry
191770006	Lake Sugema	not in a city	Van Buren	Keosauqua, Lake Sugema
191930019	Bryant School	Sioux City	Woodbury	Sioux City, Bryant Sch.

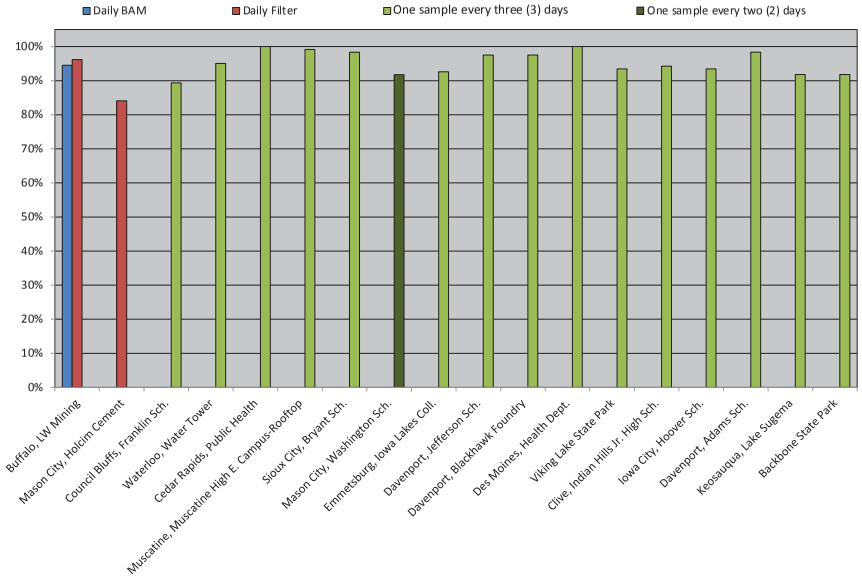
PM_{10} Monitoring Locations



Comparison of 2013 PM_{10} Data with the National Ambient Air Quality Standard



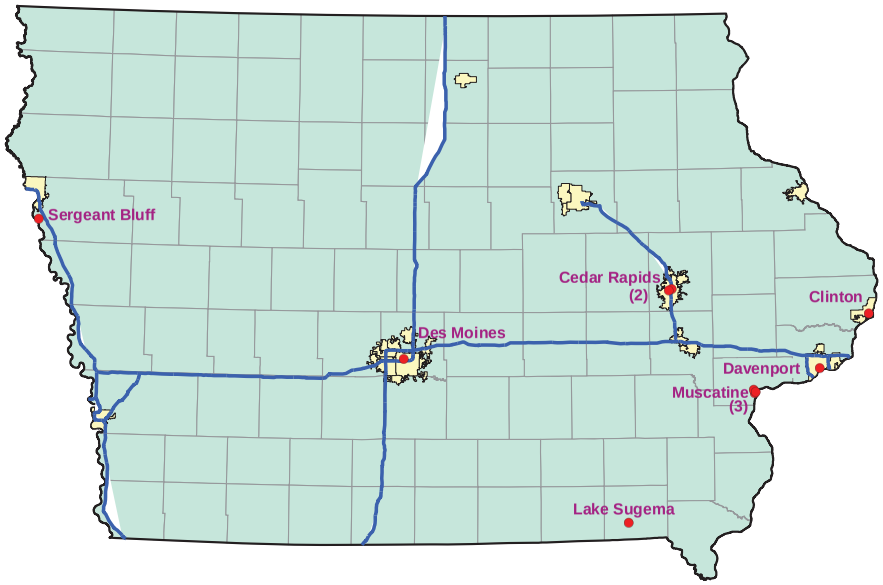
2013 Data Completeness – PM_{10}



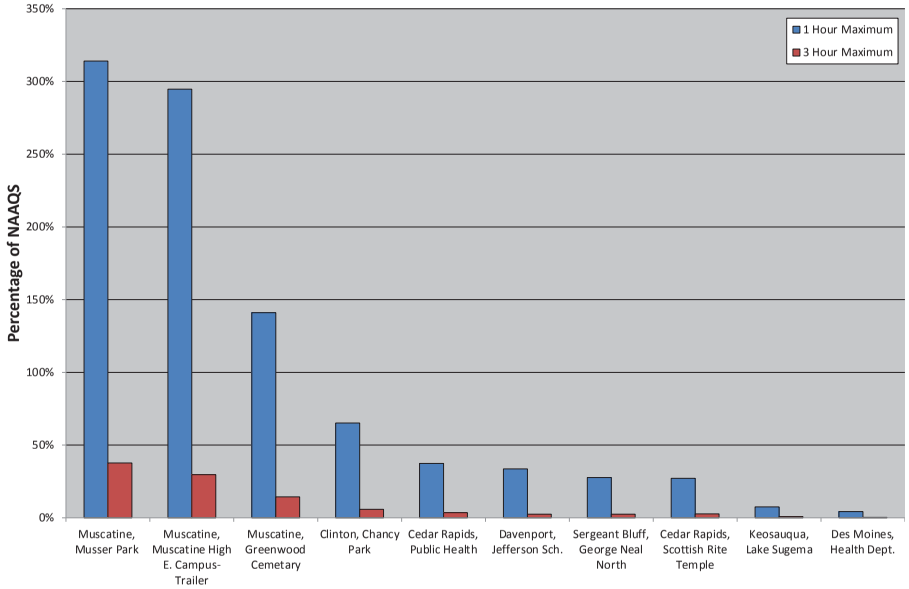
Sulfur Dioxide Monitoring Sites

Site	Name	City	County	Site Label
190450019	Chancy Park	Clinton	Clinton	Clinton, Chancy Park
191130031	Scottish Rite Temple	Cedar Rapids	Linn	Cedar Rapids, Scottish Rite Temple
191130040	Public Health	Cedar Rapids	Linn	Cedar Rapids, Public Health
191390019	Muscatine High E. Campus-Trailer	Muscatine	Muscatine	Muscatine, Muscatine High E. Campus-Trailer
191390016	Greenwood Cemetery	Muscatine	Muscatine	Muscatine, Greenwood Cemetery
191390020	Musser Park	Muscatine	Muscatine	Muscatine, Musser Park
191530030	Health Department	Des Moines	Polk	Des Moines, Health Dept.
191630015	Jefferson School	Davenport	Scott	Davenport, Jefferson Sch.
191770006	Lake Sugema	not in a city	Van Buren	Keosauqua, Lake Sugema
191930020	George Neal North	Sergeant Bluff	Woodbury	Sergeant Bluff, George Neal North

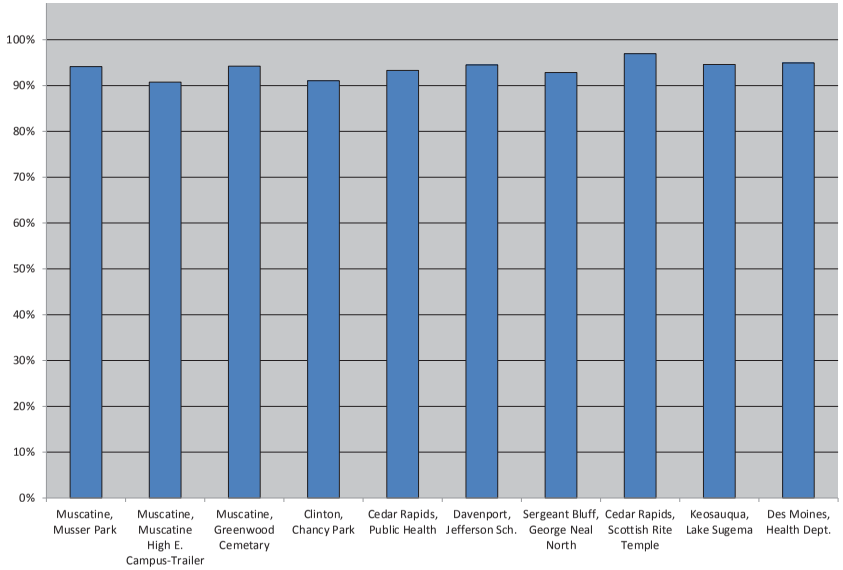
Sulfur Dioxide Monitoring Locations



Comparison of 2013 Sulfur Dioxide Data with National Ambient Air Quality Standards



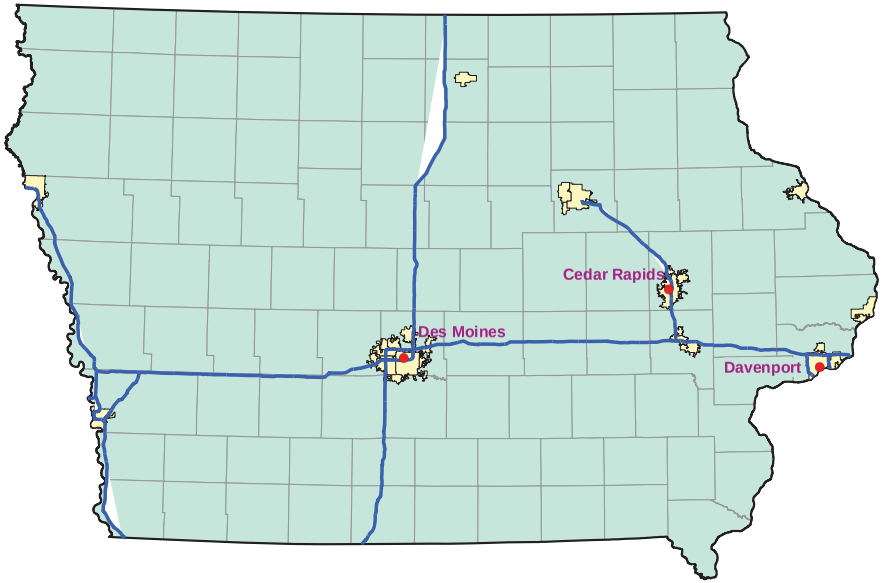
2013 Data Completeness – Sulfur Dioxide



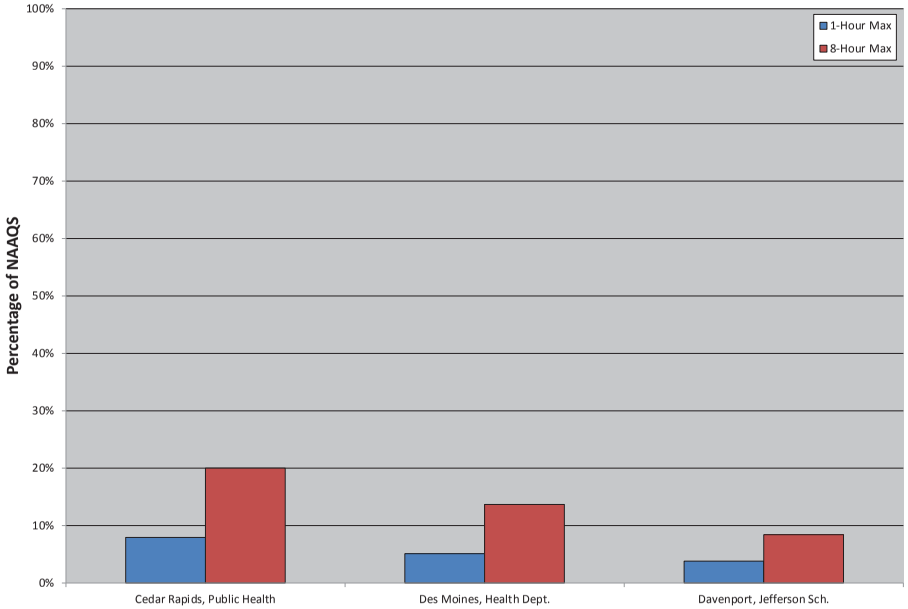
Carbon Monoxide Monitoring Sites

Site	Name	City	County	Site Label
191130040	Public Health	Cedar Rapids	Linn	Cedar Rapids, Public Health
191530030	Health Department	Des Moines	Polk	Des Moines, Health Dept.
191630015	Jefferson School	Davenport	Scott	Davenport, Jefferson Sch.

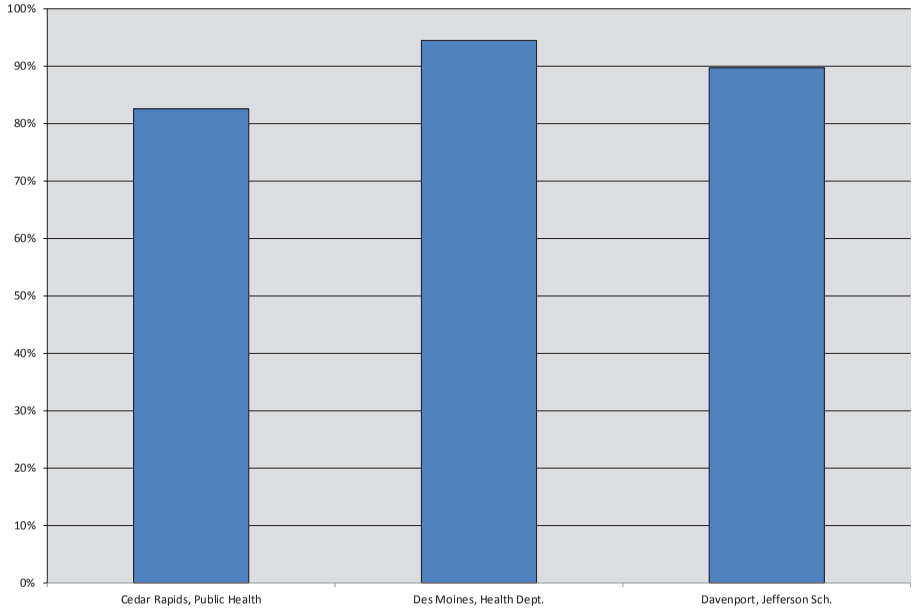
Carbon Monoxide Monitoring Locations



Comparison of 2013 Carbon Monoxide Data with National Ambient Air Quality Standards



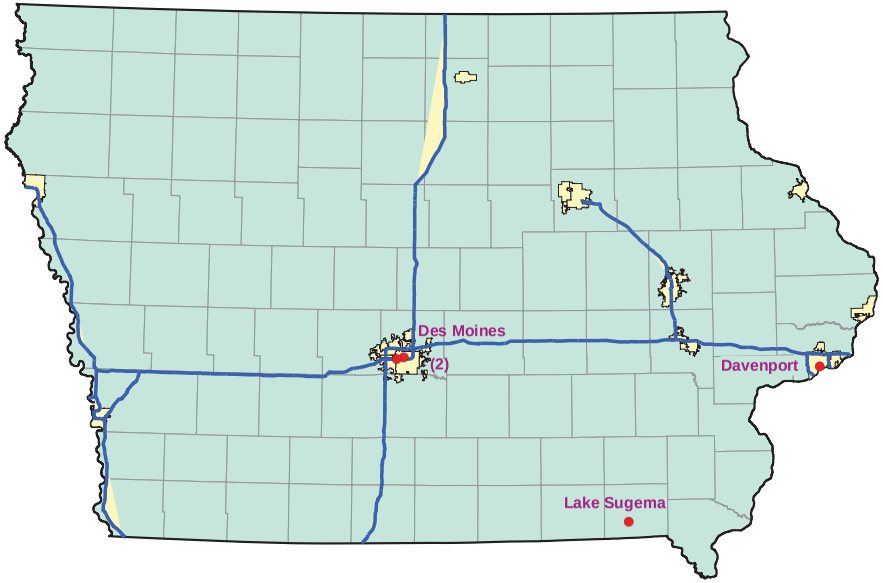
2013 Data Completeness – Carbon Monoxide



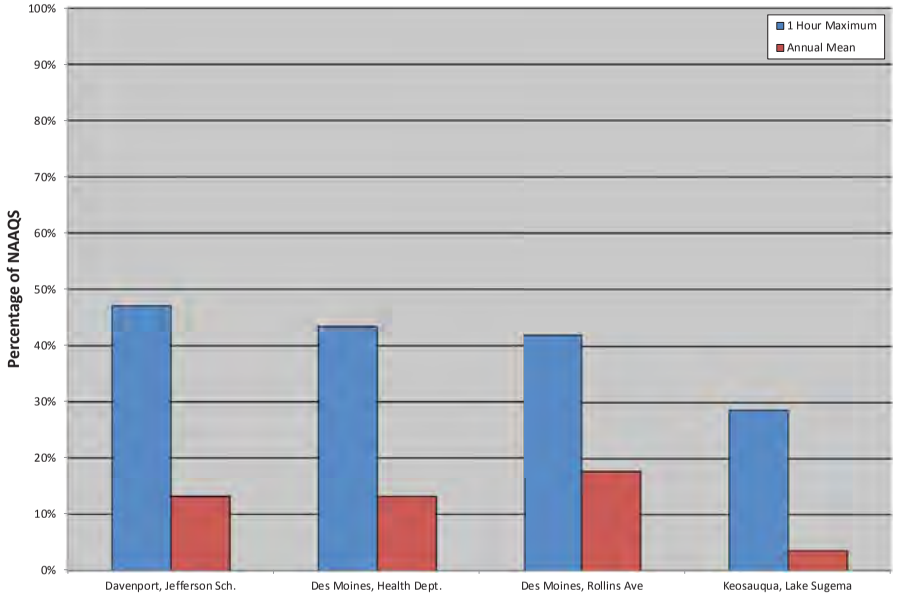
Nitrogen Dioxide Monitoring Sites

Site	Name	City	County	Site Label
191530030	Health Department	Des Moines	Polk	Des Moines, Health Dept.
191536011	Des Moines, Near-Road NO_2	Des Moines	Polk	Des Moines, Near-Road NO_2
191630015	Jefferson School	Davenport	Scott	Davenport, Jefferson Sch.
191770006	Lake Sugema	not in a city	Van Buren	Keosauqua, Lake Sugema

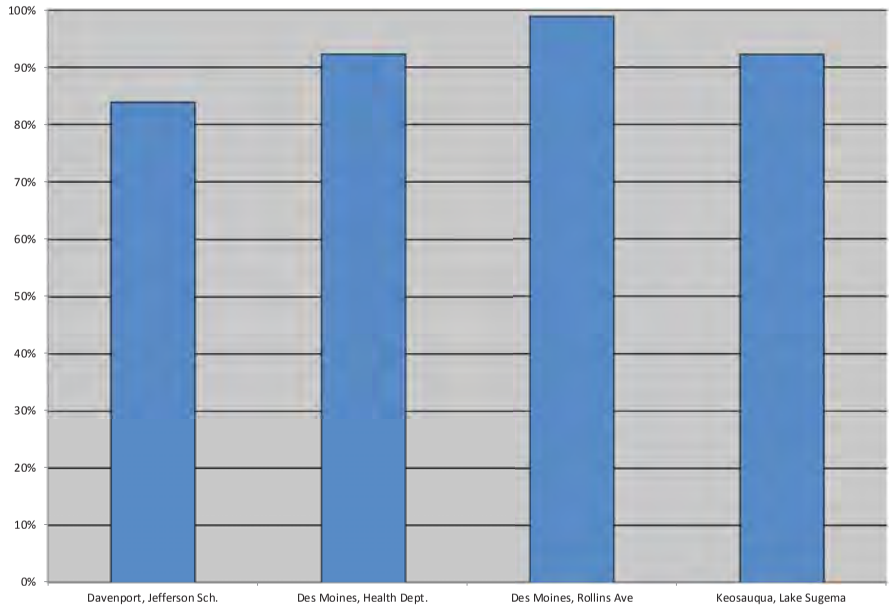
Nitrogen Dioxide Monitoring Locations



Comparison of 2013 Nitrogen Dioxide Data with the National Ambient Air Quality Standard



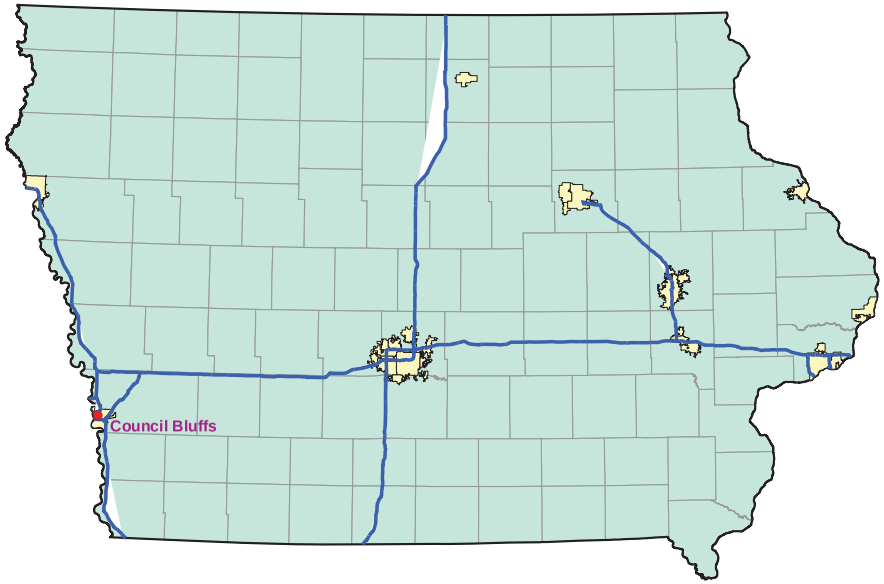
2013 Data Completeness – Nitrogen Dioxide



Lead Monitoring Sites

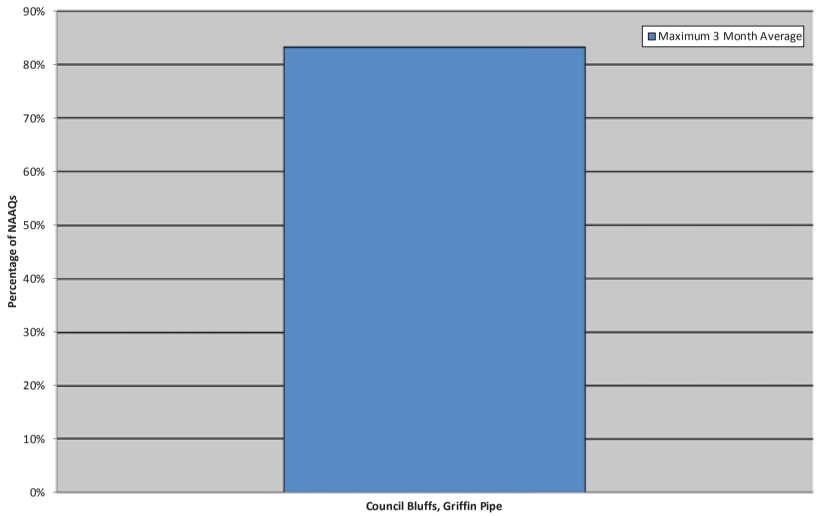
Site	Name	City	County	Site Label
191550011	Griffin Pipe	Council Bluffs	Pottawattamie	Council Bluffs, Griffin Pipe

Lead Monitoring Locations

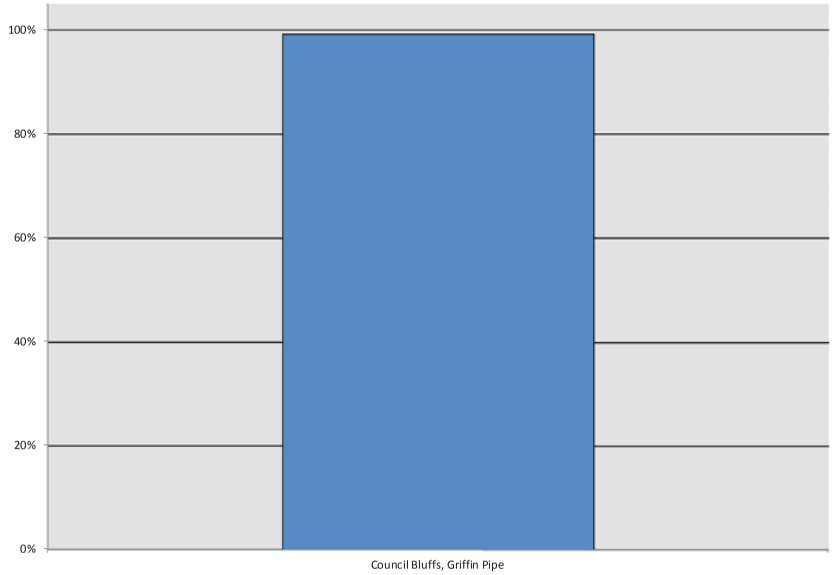


Comparison of 2013 Lead Data with the National Ambient Air Quality Standard

Maximum 3 Month Average



2013 Data Completeness – Lead



Appendix A

Additional Chart Information

Listed below is additional information that may be useful in interpreting the charts contained in this review

Ozone

Comparison of 2012 Ozone Data with National Ambient Air Quality Standards

This chart shows the highest eight hour ozone average (expressed as a percentage of the 76 ppb eight-hour NAAQS) for each ozone monitor operated in 2013.

Back to Chart

Data Completeness – Ozone

This chart shows the total number of valid ozone monitoring days (expressed as a percentage of the total number of days in ozone season) for each ozone monitor operated in 2013. According to EPA guidelines, an ozone monitoring day is considered valid if at least 75% of the 24 8-hour averages for the day are valid. An 8-hour average is valid if at least 75% of the hourly average values for the 8-hour period are available. In the event that less than 75% of the 8-hour averages are recorded, a day is also deemed valid if the daily maximum 8-hour average for that day exceeds the NAAQS ($\geq$76 ppb). Ozone season runs from April through October, and amounts to 214 possible sampling days. Ozone monitors that recorded data for all 214 days of the season would have a data capture rate of 100%.

Back to Chart

$PM_{2.5}$

Comparison of 2013 $PM_{2.5}$ Data with National Ambient Air Quality Standards

This chart shows the highest 24-hour value (expressed as a percentage of the 35.5 $\mu g/m^3$ 24-hour NAAQS), and the annual average (expressed as a percentage of the 12.05 $\mu g/m^3$ annual NAAQS) for each $PM_{2.5}$ monitor operated in 2013. If a monitoring site had collocated $PM_{2.5}$ monitors, the data from the primary monitor was chosen. If data from the primary monitor was missing, the value from the secondary monitor was augmented into the dataset.

Back to Chart

Data Completeness – $PM_{2.5}$

This chart shows the fraction of scheduled sampling days for each $PM_{2.5}$ monitor operated in 2013 where a valid $PM_{2.5}$ sample was collected. During 2013 $PM_{2.5}$ samplers in Iowa were scheduled to operate at a sampling frequency of either one sample every third day (122 scheduled samples) or one sample every day (365 scheduled samples). The sampling frequency of each monitor is indicated by the color of the bar. EPA allows consolidate of site data from collocated filter monitors. To consolidate data for two monitors, the data from the primary monitor was chosen. If data from the primary monitor was missing, the value from the

secondary monitor was substituted into the dataset. Continuous PM2.5 monitors operated in Iowa are used for real-time reporting only and are not summarized in this report.

Back to Chart

PM_{10}

Comparison of 2013 PM_{10} Data with National Ambient Air Quality Standards

This chart shows the highest 24-hour value (expressed as a percentage of the 155 µg/m^3 24-hour NAAQS) for each PM_{10} monitor operated in 2013. Buffalo, Linwood Mining has collocated BAMs and a filter monitor. EPA allows consolidation of site data from BAM monitors and also allows consolidation of site data from filter samplers. Therefore two concentrations are represented in this report. To consolidate data for two monitors, the data from the primary monitor was chosen. If data from the primary monitor was missing, the value from the secondary monitor was substituted into the dataset. Data from BAM monitors and filter monitors are consolidated separately.

Back to Chart

Data Completeness – PM_{10}

This chart shows the fraction of scheduled sampling days for each PM_{10} monitor operated in 2013 where a valid PM_{10} sample was collected. During 2013 PM_{10} samplers in Iowa were scheduled to operate at a frequency of one sample every third day (122 scheduled samples), one sample every other day (182 scheduled samples) or one sample every day (365 scheduled samples). The sampling frequency of each monitor is indicated by the color of the bar in the chart.

Back to Chart

Sulfur Dioxide

Comparison of 2013 Sulfur Dioxide Data with National Ambient Air Quality Standards

This chart shows the highest 1-hour value (expressed as a percentage of the 75.5 ppb 1-hour NAAQS), and highest 3-hour value (expressed as a percentage of the 0.55 ppm 3-hour NAAQS) for each sulfur dioxide monitor operated in 2013.

Back to Chart

Data Completeness – Sulfur Dioxide

This chart shows the total number of hourly sulfur dioxide values (expressed as a percentage of the total number of hours in 2013) for each sulfur dioxide monitor that operated in 2013. A sulfur dioxide monitor that recorded data for all 8760 hours during 2013 would have a data capture rate of 100%.

Back to Chart

Carbon Monoxide

Comparison of 2013 Carbon Monoxide Data with National Ambient Air Quality Standards

This chart shows the highest 1-hour value (expressed as a percentage of the 35.5 ppm 1-hour NAAQS) and the highest 8-hour value (expressed as a percentage of the 9.5 ppm 8 hour NAAQS) for each carbon monoxide monitor operated in 2013.

Back to Chart

Data Completeness – Carbon Monoxide

This chart shows the total number of hourly carbon monoxide values (expressed as a percentage of the total number of hours in 2013). A carbon monoxide monitor that recorded data for all 8760 hours during 2013 would have a data capture rate of 100%.

Back to Chart

Nitrogen Dioxide

Comparison of 2013 Nitrogen Dioxide Data with National Ambient Air Quality Standards

This chart shows the maximum 1-hour value (expressed as a percentage of the 100.5 ppb 1-hour NAAQS), and the annual average (expressed as a percentage of the 0.0535 ppm annual NAAQS) for each nitrogen dioxide monitoring site that operated in 2013.

Back to Chart

Data Completeness – Nitrogen Dioxide

This chart shows the total number of hourly nitrogen dioxide values (expressed as a percentage of the total number of hours in 2013). A nitrogen dioxide monitor that recorded data for all 8760 hours during 2013 would have a data capture rate of 100%.

Back to Chart

Lead

Comparison of 2013 Lead Data with National Ambient Air Quality Standards

This chart shows the maximum three month average (expressed as a percentage of the 0.155 µg/m^3 annual NAAQS) for each lead monitoring site that operated in 2013.

Back to Chart

Data Completeness – Lead

This chart shows the fraction of scheduled sampling days for each lead monitor operated in 2013 where a valid lead sample was actually collected. During 2013, lead samplers in Iowa were scheduled to operate at a one in three day sampling frequency (122 scheduled samples).

Back to Chart

EO80 Stakeholder Group for the Jordan Aquifer

June 17, 2014

- Stake Holder Group Members –

Name	Organization
John Crotty	Iowa Environmental Council
Shawn Kerrick	Koch Nitrogen
Gale McIntosh	Northway Pump
Jill Soenen	Iowa Association of Municipal Utilities
Todd Steigerwaldt	City of Marion (Water Works)
Becky Svatos	Stanley Consultants, Iowa ABI
Nancy Couser	Environmental Protection Commission

Mission Statement –

Propose revisions to regulations and management policies that preserve and protect the Jordan Aquifer as a clean, reliable water resource for Iowa now and for Iowa's future growth and economic development.

OPINION

Don't take aquifer for granted

The Gazette

CSPS HALL SIGNS NEW TENANTS, 5B

IOWA RECRUITING NEEDS IN PLACE

Water worries

Future demand raises shortage concerns in Coralville, Marion

Does C.R. still need deer hunt?

Friday, March 8, 2013 The Gazette 9A

Iowa may not have enough water to meet future needs

Associated Press

DES MOINES

How to Balance Economic Development with Long Term Water Sustainability

Background Information -

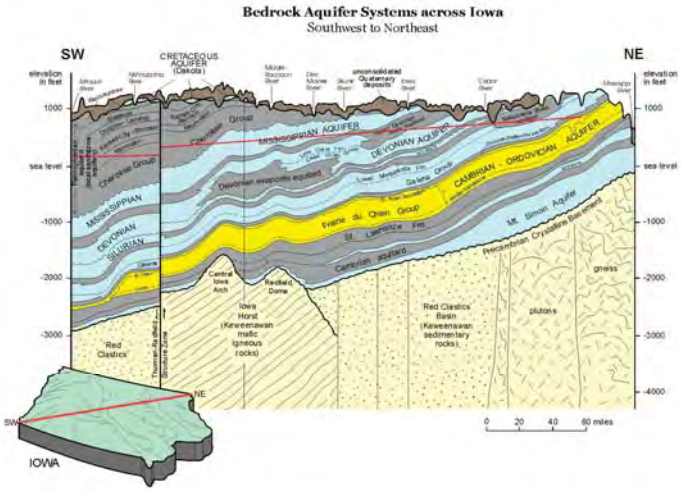
Impacts of Increased Water Demand on the Sustainability of the Cambrian-Ordovician Aquifer

Mike Gannon
IGS-IIHR

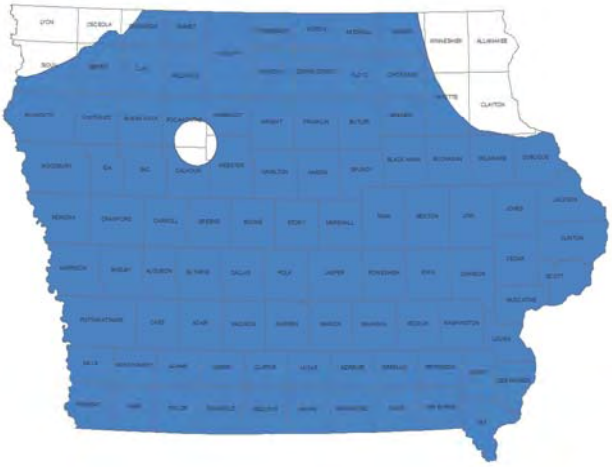
Cambrian-Ordovician Aquifer = Jordan Aquifer

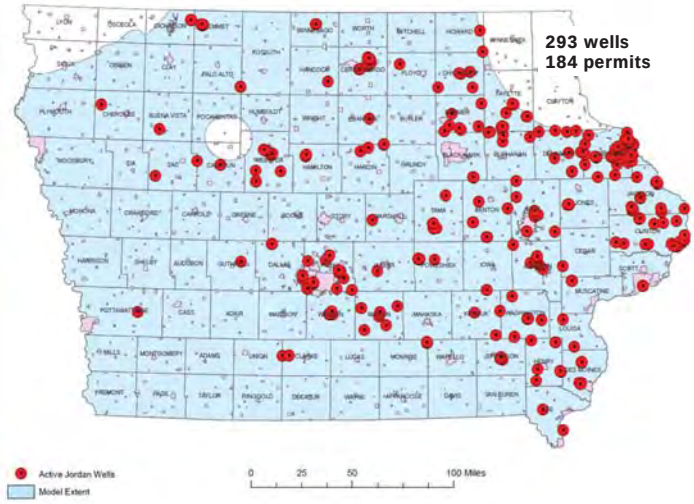
1. **St. Peter Sandstone**
2. **Prairie du Chien (primarily limestone)**
3. **Jordan Sandstone**

Cambrian-Ordovician Aquifer in Iowa

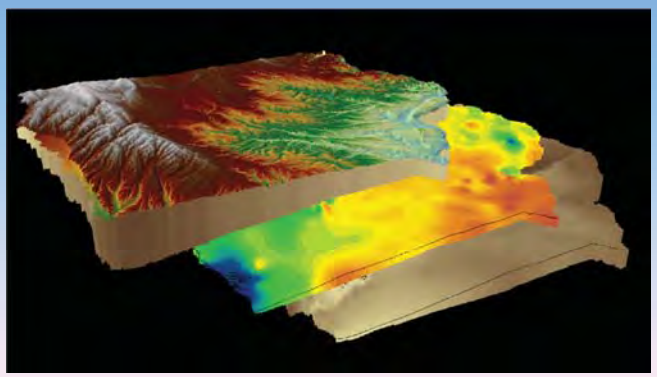


Cambrian-Ordovician Model Extent



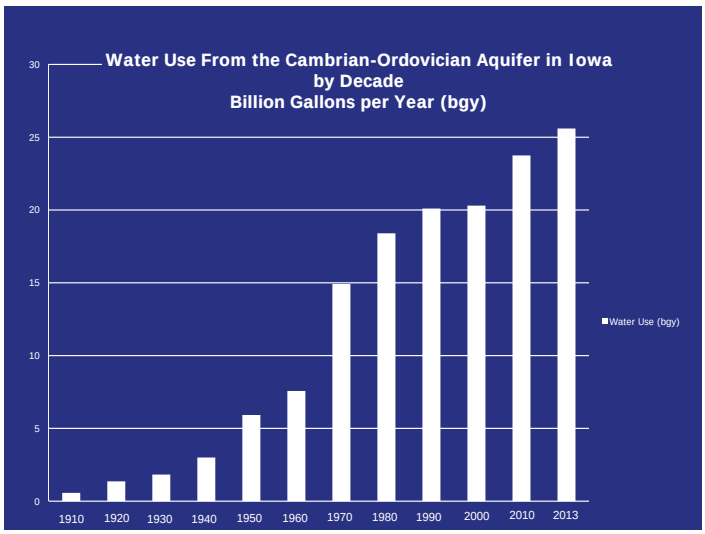


Regional Groundwater Flow Modeling



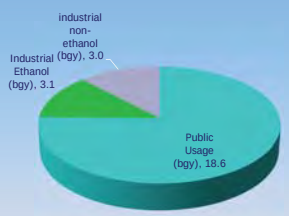
Objectives of the Regional Modeling

- Estimate water-use in the Cambrian-Ordovician aquifer (Jordan aquifer) 1900 to present.
- Identify areas or zones of significant drawdown and well interference
- Predict future groundwater availability in high use zones
- Determine drawdown since Horick and Steinhilber (1978) (baseline for IAC Ch. 52.4(3)c.)
- Will future drawdown exceed IAC Ch. 52 levels?
- Should IAC Ch. 52.4(3)c. be revised or changed?



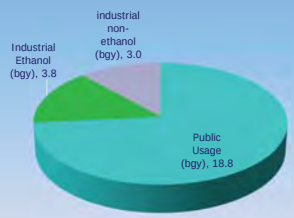
Water Usage from C-O Aquifer in billion gallons per year (bgy)

Water Usage 2008



Total usage 24.7 bgy

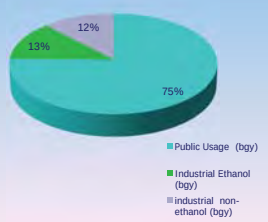
Water Usage 2013



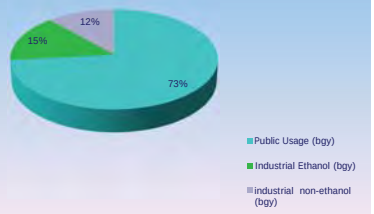
Total usage 25.6 bgy

Water Usage from C-O Aquifer as a percentage of the total

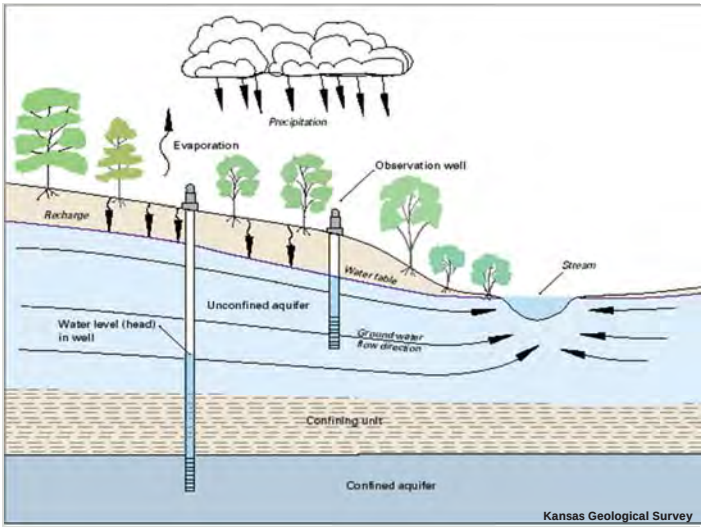
Water Usage 2008



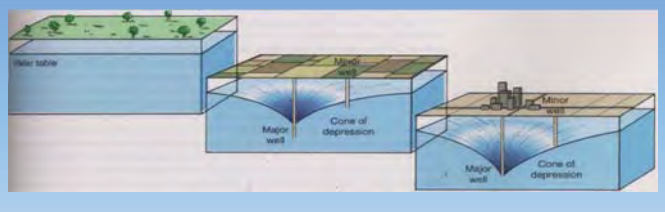
Water Usage 2013

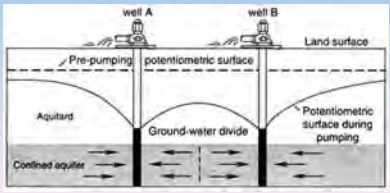


Groundwater Flow Models Can be used to Predict or Forecast Future Water Availability



Well Drawdown and Well Interference





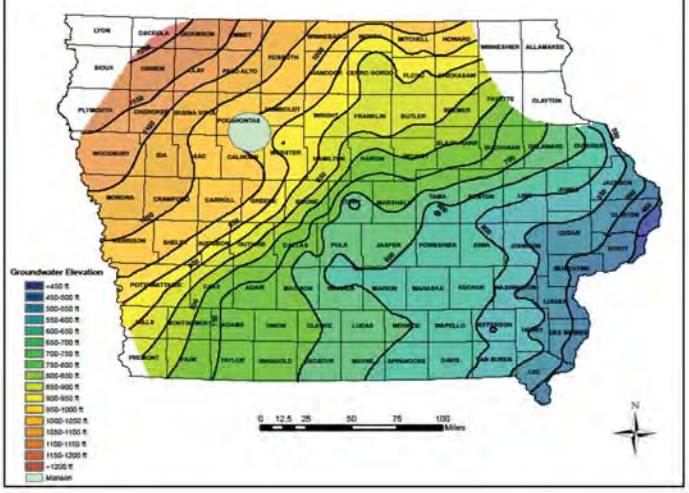
Cambrian-Ordovician (Jordan) Aquifer is Regulated in Iowa

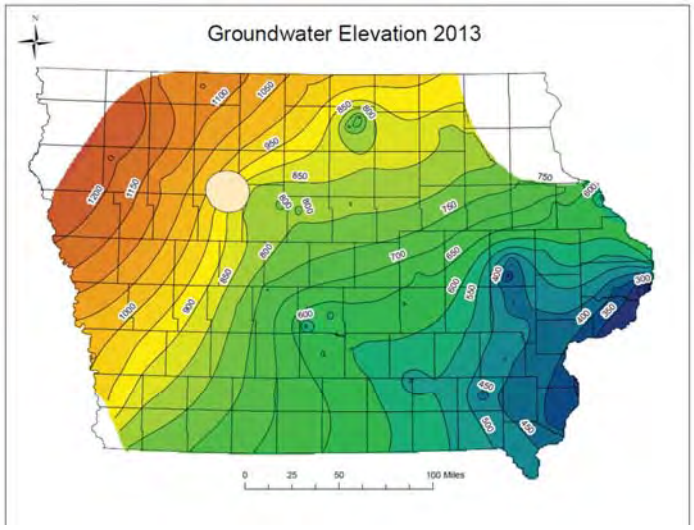
Have Regulatory Limits been exceeded?

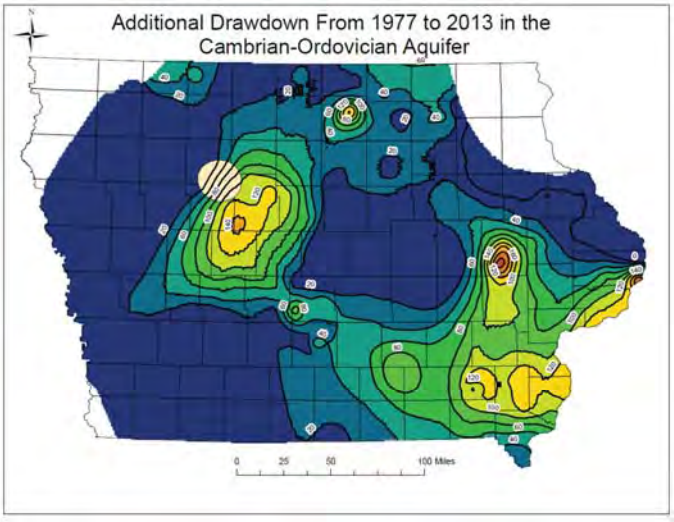
IAC 567 Chapter 52.4(3)c.

Two hundred (200) foot limit on the decline of groundwater piezometric levels. The maximum collective long-term decline in groundwater piezometric levels in the Cambrian Jordan Sandstone Aquifer in any high use area will not be permitted to exceed 200 feet from the 1977 baseline as determined from available records of the department's Iowa geological survey (IGS).

Horick and Steinhilber 1977 Potentiometric surface

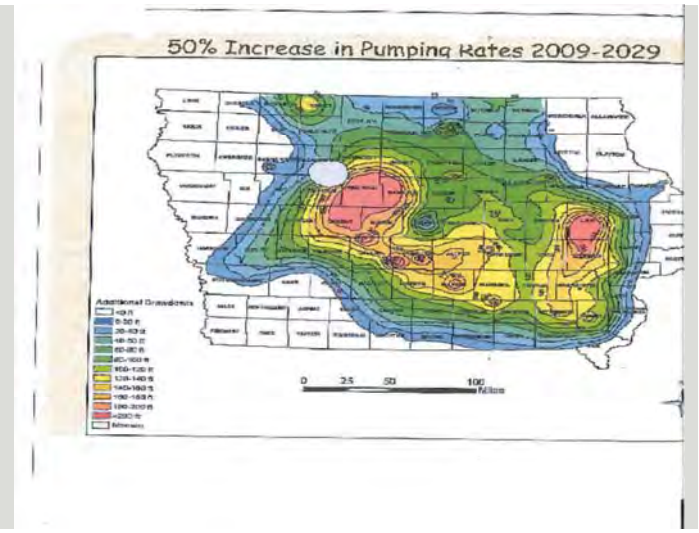






Problems with the Current Chapter 52.4(3)c

- The 200 ft. drawdown limit is a one-size fits all approach.
- NE and NC Iowa do not have 200 ft. of available drawdown.
- Central and eastern Iowa have much more available drawdown than the regulatory limit.
- What location is the 200 ft. of drawdown measured at?



EO80 Recommendations -

Three-tiered regulatory approach with specifically defined regulatory trigger points for each tier:

<u>Tier 1 Wells:</u>

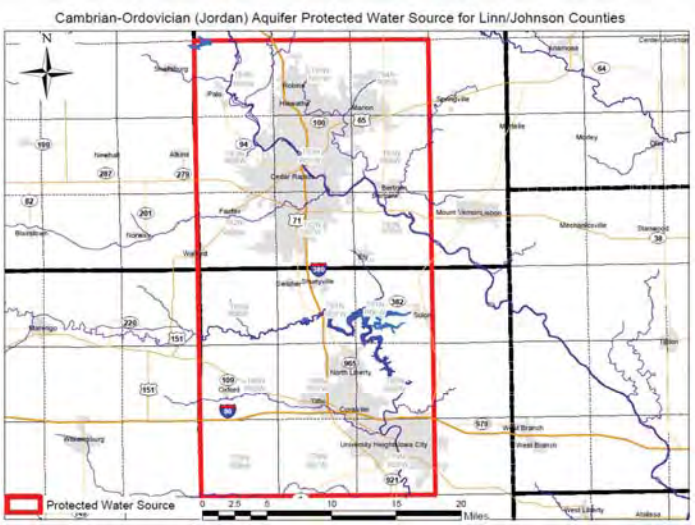
- Wells that are not yet to a level of concern based on current and proposed annual water use and drawdown reports. Applies only to existing Jordan wells.

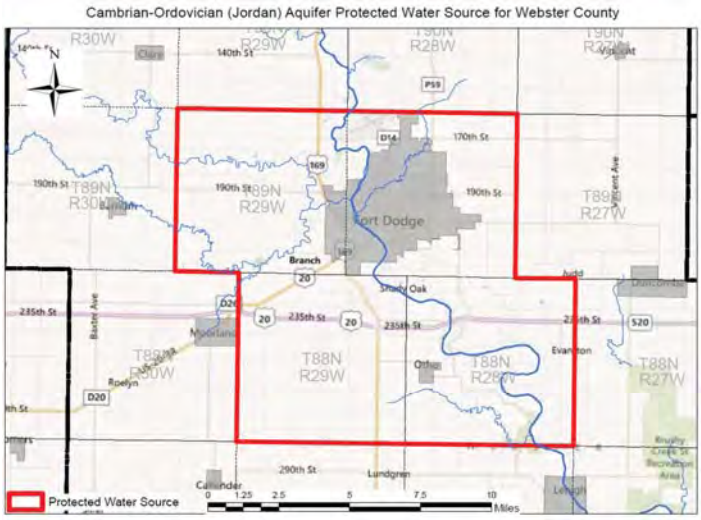
Tier 2 Wells (Protected Source Area Wells - minimum level for all new wells):

- Define an action level by which a Tier 1 well becomes a Tier 2 well. Consider using pumping levels, past actual static levels, and/or models to determine the action level.
- Example – Use 350-foot pumping water level as measurement of concern at the well head.

Tier 2 Wells (Protected Source Area Wells - minimum level for all new wells):

- Define protected water source areas based on all available data (well levels, models, etc.). Include variance options that could lead to exclusion of a well from the protected area.





Tier 2 Wells (Protected Source Area Wells - minimum level for all new wells):

- We recommend additional public notifications or updates occurring in protected water source areas.
- Require a site-specific water conservation plan that is reviewed and approved by IDNR (567 IAC 52.9). The permittee should set a defined annual usage percent reduction target that will prevent them from reaching the Tier 3 drawdown limit.

Tier 2 Wells (Protected Source Area Wells - minimum level for all new wells):

- We recommend enforcement if the conservation plan is not implemented.
- We recommend reduced allocations if the conservation plan is not implemented.
- We recommend revocation of permit if the conservation plan is not implemented.

Tier 2 Wells (Protected Source Area Wells - minimum level for all new wells):

- We recommend implementing a process to ensure that water use allocations are reserved for existing users prior to issuance of new well construction permits by IDNR and county sanitarians.
- Require water use allocation forecasts that are determined for entire pumping region prior to issuance of new well construction permits by DNR and county sanitarians.

Tier 3 Wells (Drop Dead Level):

- Define an action level by which a Tier 2 well (or group of Tier 2 wells) becomes a Tier 3 well (or group of Tier 3 wells).
- Consider using water pumping levels, past actual static levels, and/or models to determine the action level. We wanted to allow additional drawdown, but not a large additional drawdown that may have unanticipated negative consequences.

Tier 3 Wells (Drop Dead Level):

- Require reduced allocations and other aggressive water conservation plans be implemented.
- Once a well hits the drop dead level, they cannot increase their drawdown. This limit needs to be enforced.
- Use model to determine future allocations. As model improves revise allocations.

Additional Recommendations/Suggestions

- Define, for each individual well currently permitted to withdraw water from the Jordan, what the exact starting point/reference level is. (Datumn)
- Recommend switching from static water level to pumping water level measurements. If implemented, IDNR must clearly define in permits how pumping levels should be measured (i.e. drawings, written guidance, IDNR on-site technical support, etc.).

Additional Recommendations/Suggestions

- If static water level measurement remains part of the regulatory requirements, issue specific regulatory language or guidance about how to perform static water level testing.
- The Jordan Aquifer groundwater model must be maintained and improved continuously as a management tool for the aquifer.

Additional Recommendations/Suggestions

- Require all Jordan Aquifer water pump test results for existing and new wells be submitted to IDNR for use in improving the Jordan Aquifer model.
- IDNR should require water pump test results for new wells or increased water use allocation from existing wells in protected source areas. IDNR may also require observations wells.

Additional Recommendations/Suggestions

- Reevaluate protected source area warning and drop-dead water area levels every 5 years based on new model that uses annual report data and new well test pumping data.
- We recommend that IDNR hold annual public meetings and issue annual reports of the health of the Jordan Aquifer.

Additional Recommendations/Suggestions

- Create a Jordan Aquifer email list serve for all existing Jordan well permit holders to allow public notification to existing well permittee's when new allocations or wells are being considered or reviewed in the protected source areas.
- Geothermal use wording in draft regulations document received from DNR April 2014 is acceptable (no 'pump and dump' geothermal withdrawals from the Jordan Aquifer). 52.4(3) b

Additional Recommendations/Suggestions

- We recommend that no new Jordan Aquifer withdrawals for once-through (single-pass) cooling water use be allowed. If Jordan Aquifer water is allocated for cooling, the facility must use cooling towers or other methods to reuse the water.
- Requiring that initial contact for all new Jordan wells go through IDNR (before county sanitarians)

Additional Recommendations/Suggestions

- Require at issuance of new or renewed permit time:
  - Continuous totalized flow measurement from the well (meters). [567 IAC 52.6]
  - Annual reports of measured monthly totals. [567 IAC 52.6]
  - Justification of allocations greater than past annual water consumption (permit renewal process). In protected source areas, allocations beyond actual current need should be strictly limited.

Additional Recommendations/Suggestions

- We recommend switching from 10-year permit renewal to 5-year permits. [implement authority under 567 IAC 52.5(3)]

- We recommend annual on-site inspection program (public and private permits) for meters, on-site well systems, well level measurements, etc. [567 IAC 52.6]

Additional Recommendations/Suggestions

- Recommend maintaining 2000 gpm limit on industrial withdrawals in existing rules.
- Continual allocation of adequate funding and/or resources to maintain an accurate and up-to-date model. Example - Fee per million gallons withdrawn from Jordan Aquifer. Consider increasing water use fees or creating an additional fee or fund to help pay for these additional recommendations.

Summary -

- Thanks to the EPC Commission for considering our recommendations to the proposed rule changes to the Jordan Aquifer to preserve and protect the this valuable water resource for future generations to manage and enjoy.
- Contact Information – Todd Steigerwaldt, PE, General Manager, Marion Water Dept.

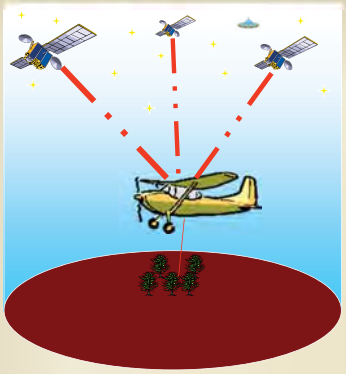
tsteigerwaldt@cityofmarion.org
(319) 743-6310

Questions ??????

THE IOWA LIDAR PROJECT

Chris Ensminger
IOWA DNR

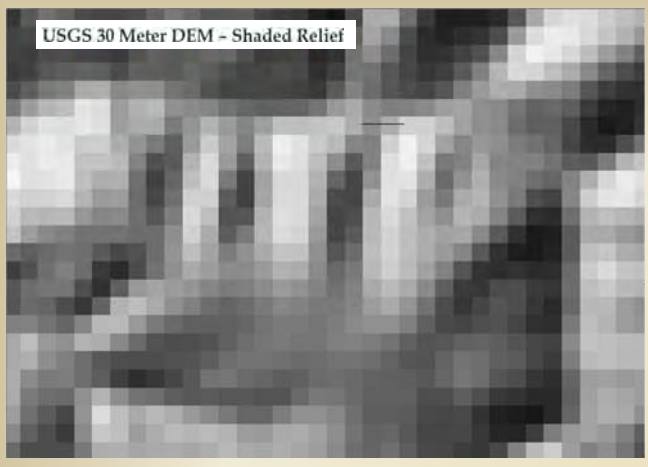
How it Works

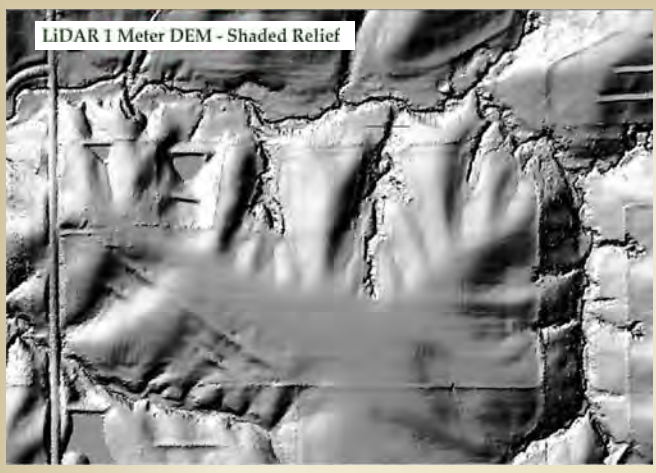


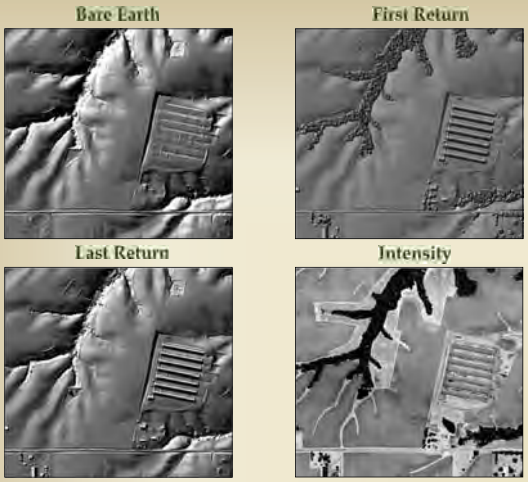
Courtesy of USGS

Iowa LiDAR Project

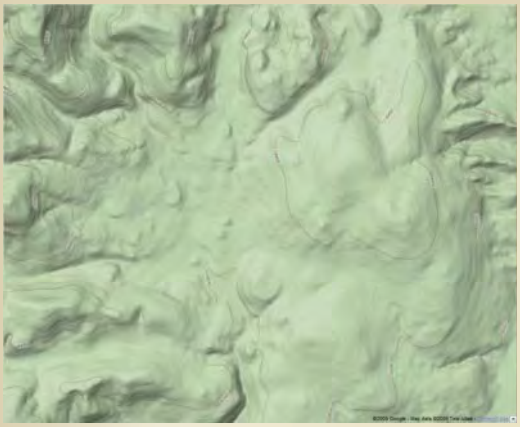
- Partners: DOT, NRCS, IDALS, USGS
- Cost: $4.3 Million
- Area: 56,253 mi2
- LiDAR Accuracy: 18.5 cm (bare ground)
- 37.0 cm (vegetated areas)
- Timeframes: Fall 2006 through Fall 2010
- * 160, 117,320,646 Elevation Points Collected



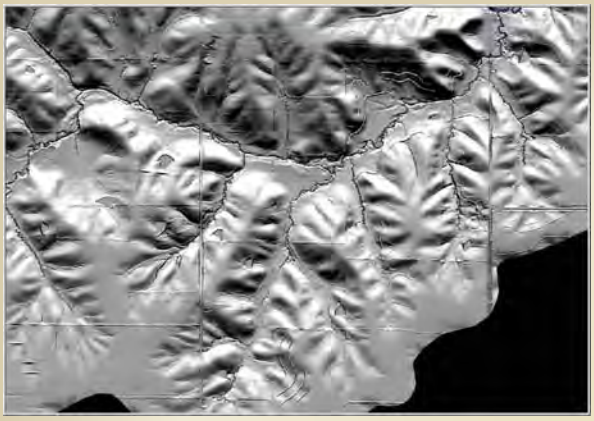




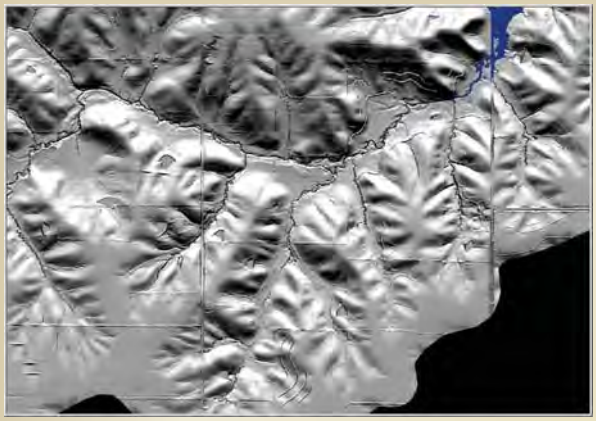
2 Foot Contours



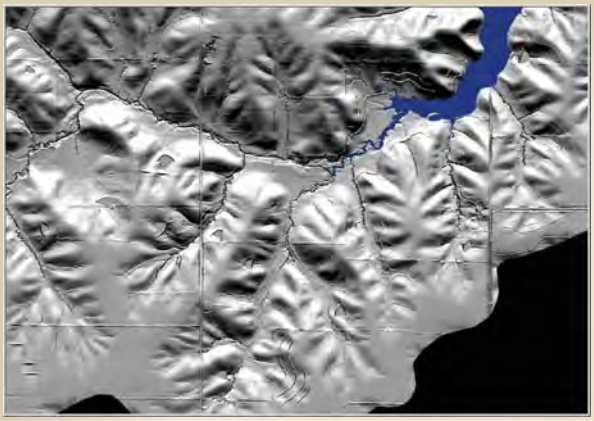
Pool elevation 1015 ft



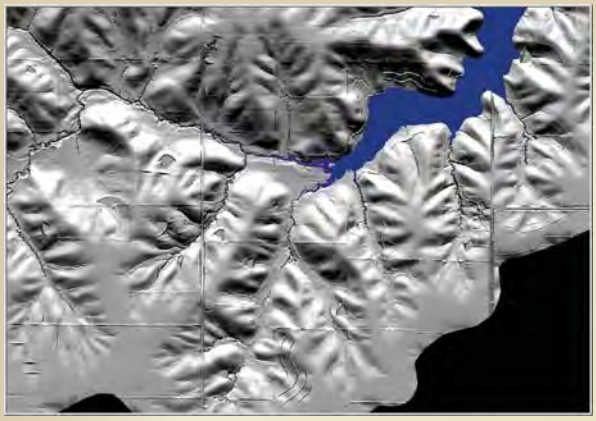
Pool elevation 1020 ft



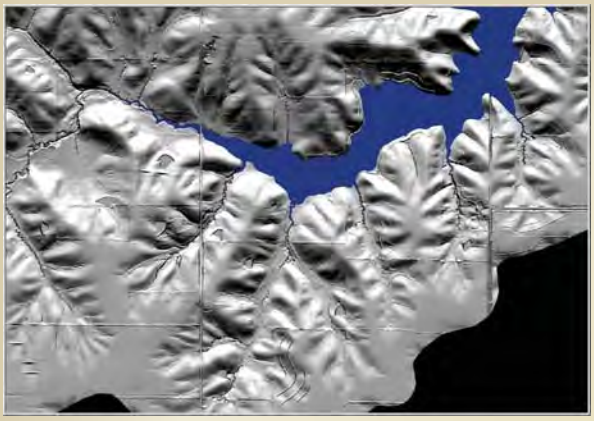
Pool elevation 1025 ft



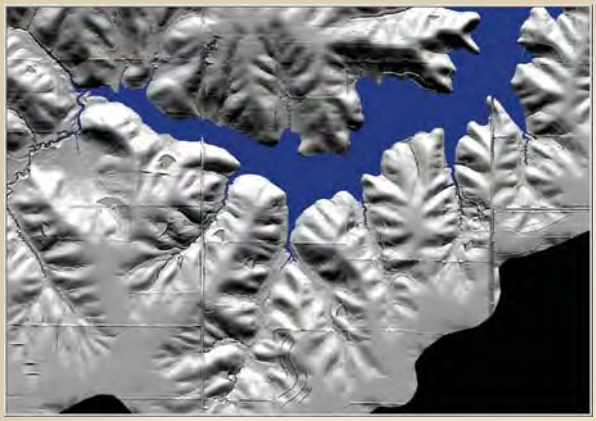
Pool elevation 1030 ft



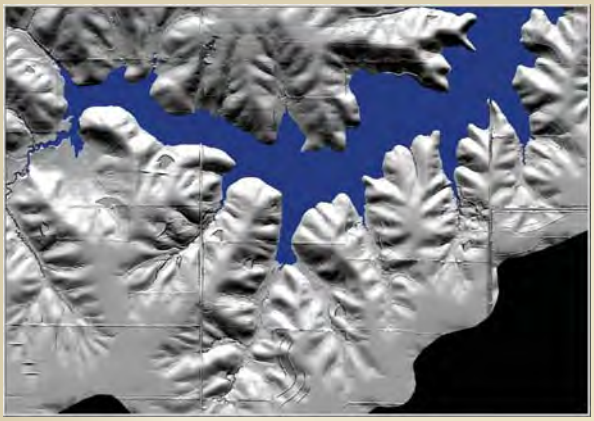
Pool elevation 1035 ft

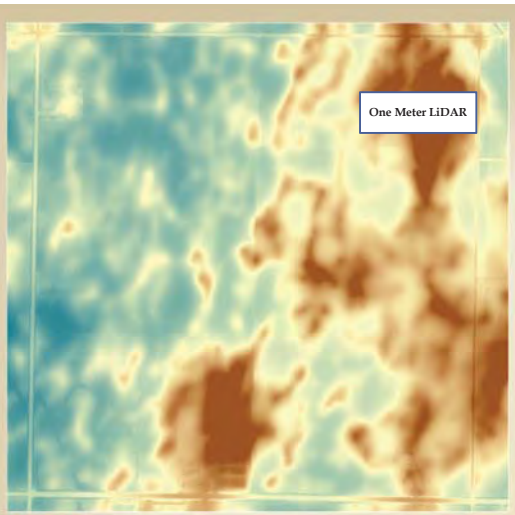


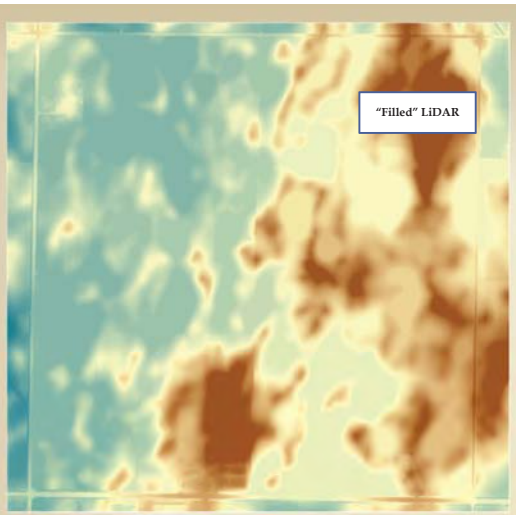
Pool elevation 1040 ft

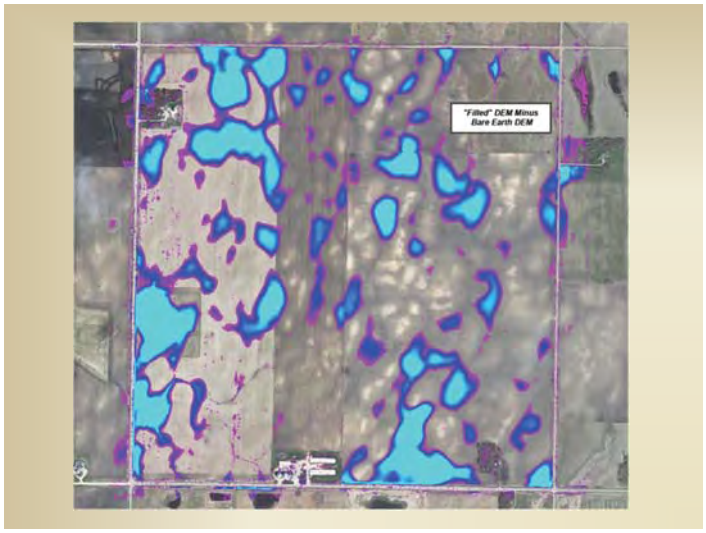


Pool elevation 1045 ft

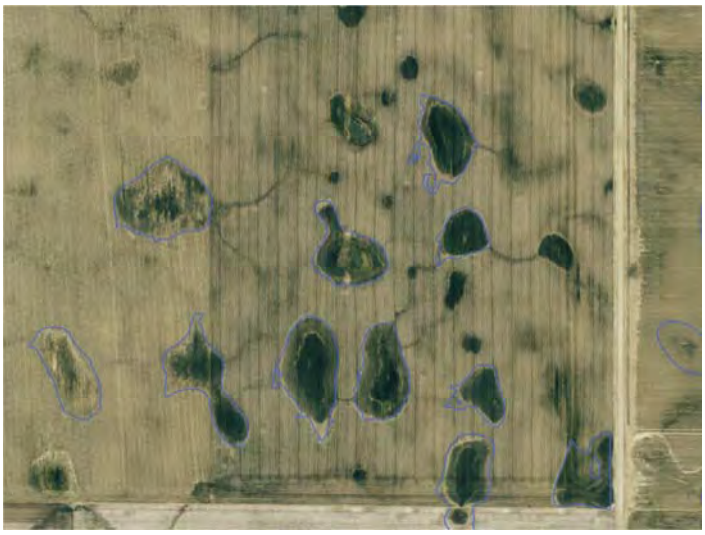







"Filled" DEM Minus
Bare Earth DEM

Depressions
> 10 cm Deep



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SA: 1.11
SA: 2.08
SA: 1.83

Max: 4.49
Mean: 1.94
Vol: 3.83
Max: 2.93
Mean: 1.38
Vol: 4.12
Max: 3.01
Mean: 1.29
Vol: 1.34
Max: 3.58
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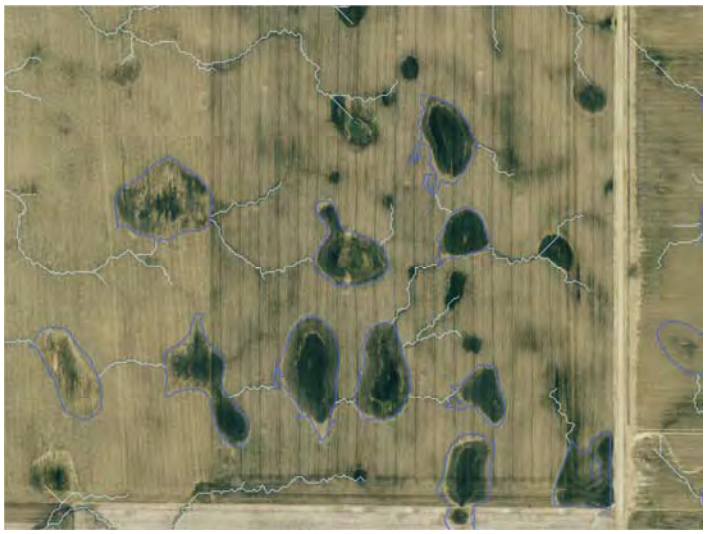

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P: 75.47
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RC: 6.5
SR: 20.47
P: 32.87
N: 142.54
RC: 7.8
SR: 19.29
P: 30.87
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RC: 6.1
SR: 15.11
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SR: 20.77
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SR: 27.1
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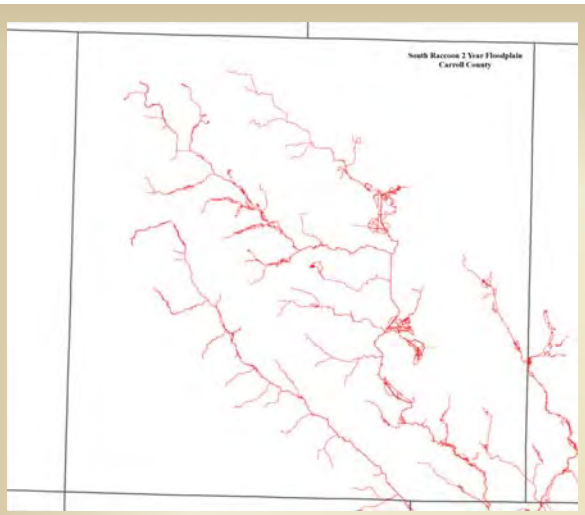
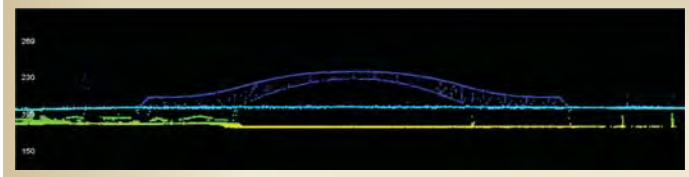
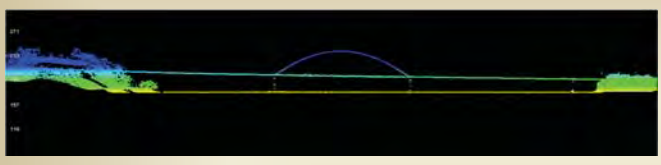
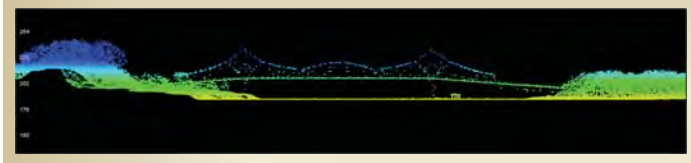
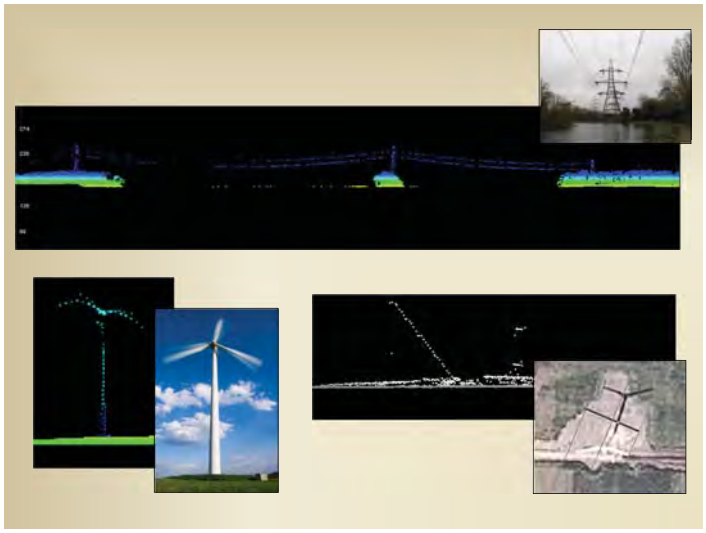

South Raccoon 2 Year Floodplain
Carroll County

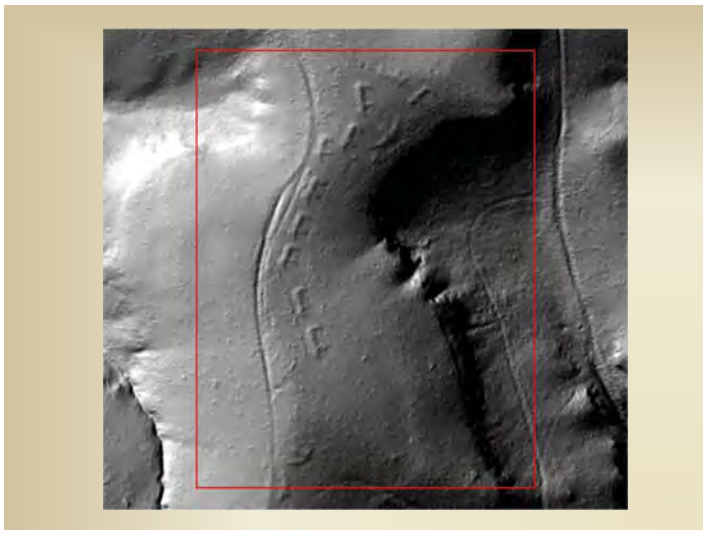
Cool Stuff

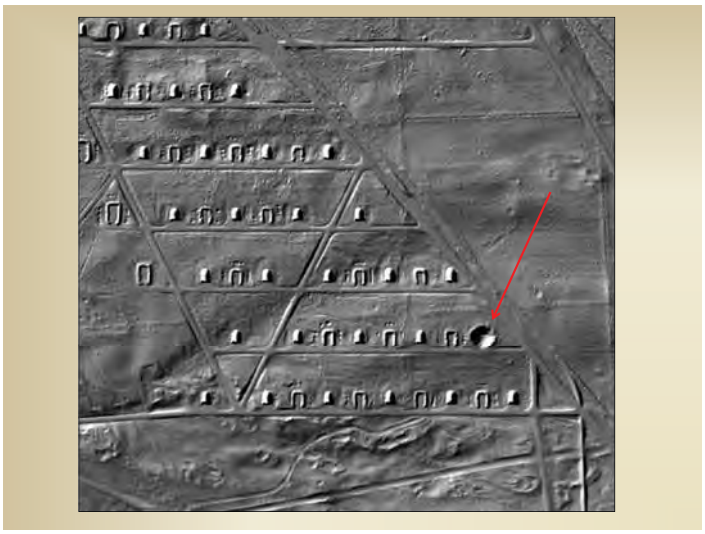




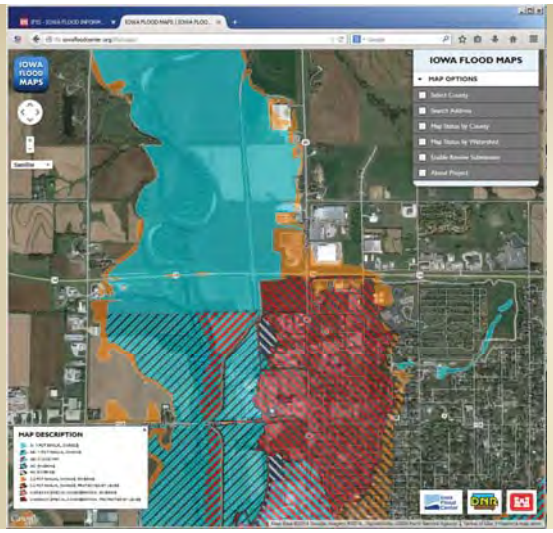








IOWA FLOOD MAPS
MAP OPTIONS
MAP DESCRIPTION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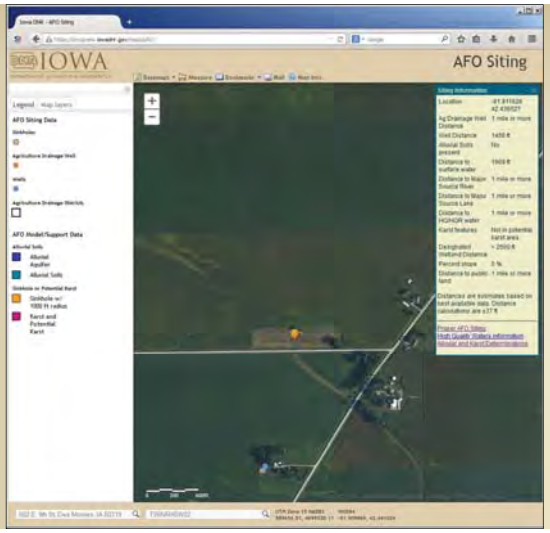
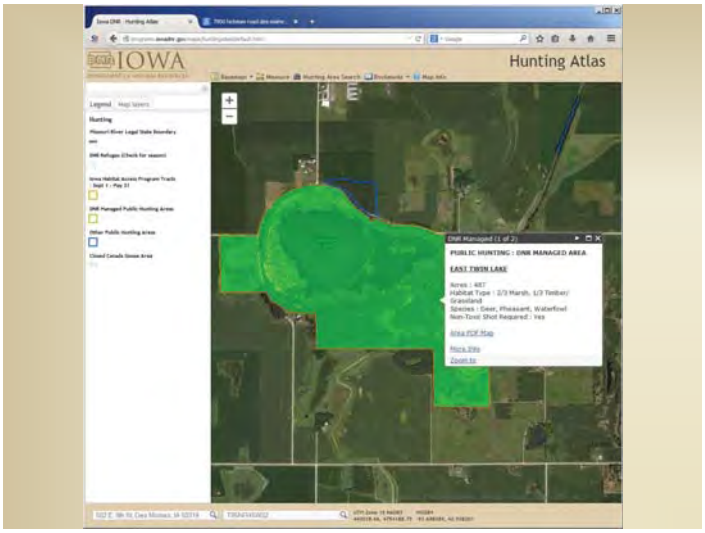
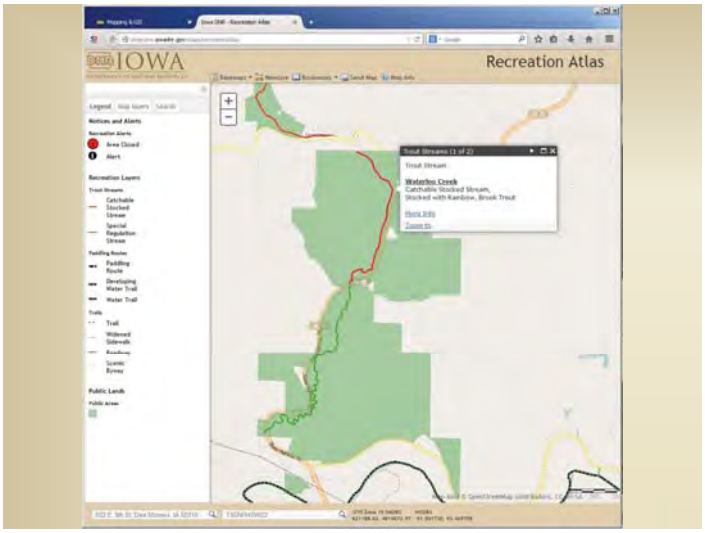
MAP OPTIONS
MAP DESCRIPTION


IOWA
AFO Siting

IOWA
Historic Aerial Photo Project


IOWA
Hunting Atlas
PUBLIC HUNTING : DNR MANAGED AREA
EAST TWIN LAKE


IOWA
Recreation Atlas
Waterloo Creek

Agenda

Environmental Protection Commission

Tuesday, June 17, 2014
DNR Air Quality Suite 1
7900 Hickman Road
Windsor Heights, Iowa

10:00 AM – EPC Business Meeting begins
10:30 AM – Public Participation[1] – Requests to speak must be submitted to Jerah Sheets at Jerah.Sheets@dnr.iowa.gov or 515-313-8909 prior to the meeting or at the meeting prior to the start of Public Participation
1:00 PM – Executive Order 80 (EO 80) Stakeholder Group on Permits for Diversion, Storage, and Withdrawal of Water from the Cambrian-Ordovician (Jordan) Aquifer
1:30 PM – Educational Presentation of GIS Resources

	Agenda topics	
1	Approval of Agenda	
2	Approval of Minutes	
3	Director's Remarks	
4	Contract with University of Iowa for Dam Safety Inspectors	Lori McDaniel (Decision)
5	Contract – USGS Stream Gage Agreement	Lori McDaniel (Decision)
6	University of Northern Iowa, Iowa Waste Reduction Center – Iowa Waste Exchange Program technical assistance, database management and training	Jennifer Wright (Decision)
7	Region XII Council of Governments - Grant Awardee for delivery of the Iowa Waste Exchange program	Jennifer Wright (Decision)
8	Solid Waste Alternatives Program – Contract Recommendations	Tom Anderson (Decision)
9	Clean Water and Drinking Water State Revolving Loan Fund – FY 2015 Intended Use Plans	Patti Cale-Finnegan (Decision)
10	Contract – Iowa Department of Agriculture and Land Stewardship – Union Grove Lake Watershed Project – Phase 1A Water Quality Improvement	Kyle Ament (Decision)
11	Contract with Iowa State University for National Water Quality Initiative (NWQI) Monitoring in the Black Hawk Lake Watershed	Allen Bonini (Decision)
12	Contract amendment with Iowa Department of Agriculture and Land Stewardship – Division of Soil Conservation for Easter Lake Watershed Project Phase 1.	Rachel Glaza (Decision)
13	Contract with University of Iowa for Laboratory Certification	Kathleen Lee (Decision)

14	Contract with Windsor Solutions, Inc. for State & Local Emissions Inventory Systems (SLEIS)	Jason Marcel (Decision)
15	Contract with University of Iowa on behalf of the State Hygienci Laboratory for 2015 SHL Services in Support of the DNR Air Quality Bureau	Sean Fitzsimmons (Decision)
16	2015 Contract with Linn County Air Quality Division: Air Pollution Control in Linn County	Christina Iiams (Decision)
17	2015 Contract with Polk County Air Quality Division: Air Pollution Control in Polk County	Christina Iiams (Decision)
18	2015 Contract University of Northern Iowa – Iowa Air Emissions Assistance Program (IAEAP): Small Business Assistance Program	Christina Iiams (Decision)
19	Executive Order 80 (EO 80) Stakeholder Group on Permits for Diversion, Storage, and Withdrawal of Water from the Cambrian-Ordovician (Jordan) Aquifer	Todd Steigerwaldt (Information)
20	Monthly Reports	Bill Ehm (Information)
21	General Discussion • DNR Strategic Goals	 Bill Ehm
22	Items for Next Month's Meeting • July 14, 2014 – EPC Educational Tour, Scott County • July 15, 2014 – EPC Business Meeting, Scott County • August 19, 2014 – EPC Business Meeting, Windsor Heights	

For details on the EPC meeting schedule, visit http://www.iowadnr.gov/InsideDNR/BoardsCommissions.aspx.

[1] Comments during the public participation period regarding proposed rules or notices of intended action are not included in the official comments for that rule package unless they are submitted as required in the Notice of Intended Action.

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM 4 DECISION

TOPIC Contract with University of Iowa for Dam Safety Inspectors

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Recommendations: Commission approval is requested for a one year-service contract with the University of Iowa, Iowa City, IA. The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $60,080.

Funding Source: This contract will be funded through the federal Dam Safety Grant (CFDA 97.041) and State General Fund specifically appropriated to Flood Plain Management & Dam Safety.

Background: The Iowa Department of Natural Resources has the authority to perform periodic inspections of dams to ensure the safety of human life and property.

The DNR's Dam Safety Program is tasked with protecting the public from risks associated with dams. The stored water behind a dam can cause extensive damage downstream if the dam should fail. The DNR inspects dams meeting these criteria:

- All high hazard dams (every two years)
- Moderate hazard dams with permanent water storage or more than 100 acre feet and with more than 250 acre feet of top of dam storage (every five years)
- Dams where the storage capacity multiplied by the dam's height is greater than 30,000 (every five years)
- The DNR will also visit dams that show possible signs of failure or at the request of a dam owner.

Inspectors look for:

- Damage to the embankment, including vegetation, waterline erosion, poor slope stability, damage from burrowing rodents and signs of seepage.
- The condition of the dam's main spillway, making sure it is clear of debris and structurally sound, and other parts of the spillway are working.
- The condition of the emergency spillway, ensuring it is free of trees, brush and debris.
- Functioning drains and outlets.
- Any changes to conditions or land uses downstream.
- Verification the dam is operating under its permit conditions.

Currently, dam safety program staff is working with about 40 owners of dams that have not been ranked "satisfactory." Generally, these dams need repairs to their spillways, need trees removed, have seepage problems or need to be brought up to modern design criteria.

Purpose: The parties propose to enter into this Contract for the purpose of retaining the Contractor to provide: 2 Dam Safety Inspectors on a part time/hourly basis.

Inspections are completed by the two part-time contract inspectors, Dick Hall out of Sioux City and Larry Dorgan out of Creston. Both are retired NRCS engineers. The DNR's senior dam safety engineer assigns dam inspections to each inspector. After the inspection is completed, the report is sent back to the dam safety engineer, who then begins any compliance follow-up actions as necessary.

Lori McDaniel, Supervisor
Flood Plain Management & Dam Safety Section, Land Quality Bureau
Environmental Services Division
May 21, 2014

Section 5 STATEMENT OF WORK

5.1 Statement of Work. Contractor shall perform the following tasks. Contractor shall complete its obligations under this Contract by the Task Milestone Dates set out in the following table.

Obligation	Task Milestone Date
Task 1: Dam Safety Inspections **Description:** Contractor shall conduct Dam Safety Inspections. Contractor shall employ two hourly part-time staff positions to work on the Tasks assigned by this Contract. DNR shall designate the dams to be inspected by Contractor, and each inspection shall occur within 30 days of DNR's request. Each inspection shall result in the completion of a written inspection report using the DNR's template that shall include the following information: • The date of the inspection • The name of the inspector • The location of the inspection An estimated 80 inspections shall be completed by the inspectors provided by the Contractor. Inspectors shall inspect for all of the following: • Damage to the embankment, including vegetation, waterline erosion, poor slope stability, damage from burrowing rodents and signs of seepage. • The condition of the dam's main spillway, making sure it is clear of debris and structurally sound, and other parts of the spillway are working. • The condition of the emergency spillway, ensuring it is free of trees, brush and debris. • Functioning drains and outlets. • Any changes to conditions or land uses downstream. • Verification the dam is operating under its permit conditions. All written inspection reports shall be submitted to DNR for review by one of the DNR's dam safety engineers. Reports shall be submitted no later than the last day of the month following the month during which the inspection occurred. Inspectors shall complete any requests for follow-up actions designated by DNR's dam safety engineers	Ongoing – Physical Dam Inspections and Inspection reports shall occur as assigned by DNR on a monthly basis and shall be tracked through the monthly invoice and as directed by the Department's senior dam safety engineer.

Iowa Department of Natural Resources
Environmental Protection Commission

ITEM 5 **DECISION**

TOPIC **Contract – USGS Stream Gage Agreement**

Recommendation:
The Department requests Commission approval of a contract for $225,970 with USGS for the time period of July 1, 2014 – June 30, 2015. The Department's contribution to this agreement is $224,100. The USGS contribution to this agreement is $1,870. This agreement covers the continuing support, operation and maintenance of 16 stream gaging stations - 14 fully supported and 2 partially supported. The individual gages are listed below.

Funding Source:
This project will be funded through state general fund dollars specifically dedicated to Flood Plain Management and Dam Safety.

Background:
After the floods of 2008, a legislative appropriation was made dedicated to flood plain management and dam safety. Part of the legislative intent of this funding was to continue to support USGS stream gaging efforts in Iowa.

Purpose:
The purpose of this contract is to continuing support, operation and maintenance of 16 stream gaging stations. There are 14 fully supported gages and 2 partially supported gages. These stream gages will assist in the tracking and predicting of flood events by compiling the necessary data relating to flood frequency analysis.

USGS Joint Funding Agreement:

The USGS operates and maintains approximately 7,500 stream gages which provide long term, accurate, and unbiased information on stream low to meet the needs of many diverse users. The USGS stream gaging network is currently funded in partnership with over 800 Federal, State, and local agencies nationwide. The Iowa DNR has partnered with USGS for many years to maintain Iowa's network of stream gages. The data gathered through the use of these stream gages is consistent, obtained by using standard techniques and technology and is subject to quality assurance and quality control.

Scope of Work:
The scope of work of this contract is the continued support, operation and maintenance of 16 stream gaging stations. There are 14 fully supported gages and 2 partially supported gages.

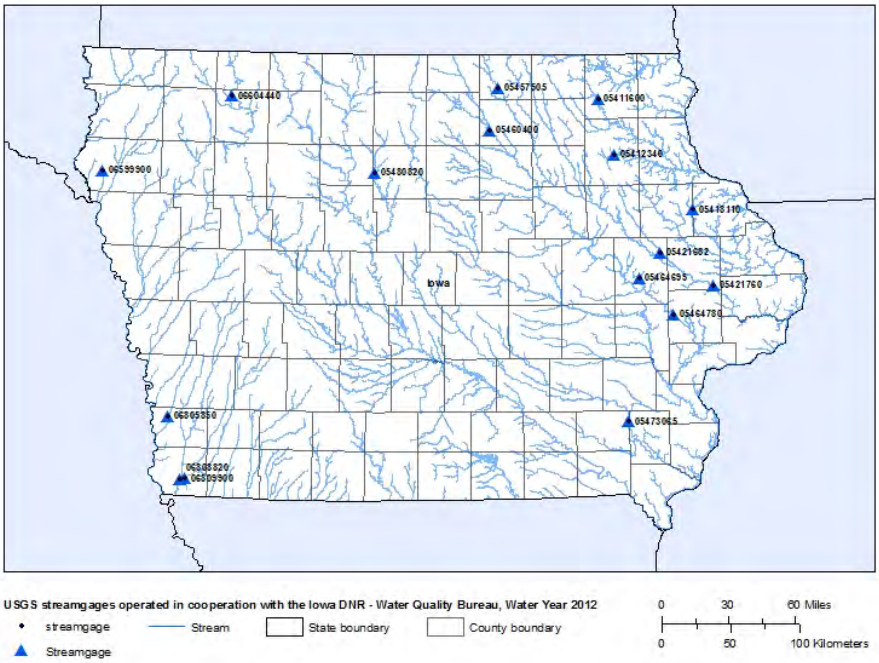
The locations of the fully supported and partially supported stream gages are listed below:

Fully supported stream gages:

Gage Num	Location
05411600	Turkey River at Spillville, IA
05412340	Volga River at Fayette, IA
05418110	NF Maquoketa River below Bear Cr at Dyersville, IA
05421682	Buffalo Creek South of Praireburg, IA
05421760	Wapsipinicon River at Oxford Mills, IA
05457505	Cedar River at Osage, IA
05460400	Shell Rock River near Rockford, IA
05464695	Indian Creek at Marion, IA
05464780	Cedar River at Cedar Bluff, IA
05473065	Skunk River at Merrimac, IA
06604440	Little Sioux River at 300th St near Spencer, IA
06805850	Keg Creek at Epperson Avenue near Glenwood, IA
06808820	West Nishnabotna River near Riverton, IA
06809900	East Nishnabotna River at Riverton, IA

Partially supported stream gages:

06599900	Perry Creek near Millnerville, IA
05480820	Boone River near Goldfield, IA



Lori McDaniel, Supervisor
Flood Plain Management & Dam Safety Section, Land Quality Bureau
Environmental Services Division

Iowa Department of Natural Resources
Environmental Protection Commission

ITEM **6** **DECISION**

TOPIC **University of Northern Iowa, Iowa Waste Reduction Center – Iowa Waste Exchange Program technical assistance, database management and training**

Recommendation:
The Department requests Commission approval of a contract in the amount of $30,000 with the University of Northern Iowa, Iowa Waste Reduction Center (IWRC) for one year. The contract is for the IWRC to provide technical assistance, database management and training for the Iowa Waste Exchange program.

Funding Source:
This project will be funded through the Groundwater Protection Fund, Solid Waste Account where monies are received from the tonnage fee imposed under section 455B.310.

Background:
Iowa Code section 455E.11(2)(*a*)(2)(c) Groundwater Protection Fund, requires that:

The Department shall expend not more than thirty thousand dollars of the moneys appropriated under this subparagraph subdivision to contract with Iowa Waste Reduction Center (IWRC) at the University of Northern Iowa.

Purpose:
The purpose of this contract is to provide technical assistance, database management and training to the Iowa Waste Exchange program and its Representatives.

Consulting Firm Selection Process:
A selection process was not conducted because these moneys are legislated to be distributed to the University of Northern Iowa, Iowa Waste Reduction Center.

Statement of Work:
For an outline of the statement of work, see attached.

Based on the Iowa Code and existing relationships with the University of Northern Iowa, we recommend the contract with the University of Northern Iowa, Iowa Waste Reduction Center be approved**.**

Jennifer Wright, Supervisor
Land Quality Bureau
Environmental Services Division

May 23, 2014

Attachment: Contract Statement of Work

STATEMENT OF WORK

The Department's stated objective is for the Iowa Waste Reduction Center (the Contractor) to provide technical assistance, and database maintenance and coordination for the Iowa Waste Exchange program as approved by the Department. The services included below may be amended at any time by the Department or the Contractor upon prior approval by the Department. The Contractor will provide the following tangible products:

I. Technical Assistance Services

The Contractor shall deliver technical assistance services requested by the Department to the Iowa Waste Exchange (IWE) program to improve overall service of the IWE database and beneficial results for the program's clients. Services may include the following:

1. Reviewing sample listings of potential markets to determine if they meet the minimum qualifications necessary to be listed on the IWE database
2. Electronically updating and distributing the IWE Handbook to the Department and to all IWE area Resource Specialists
3. Conducting database training for all IWE program staff and partners
4. Assisting the Department with the maintenance of the IWE database
5. Identifying database improvements and updates and serving as a team member for additional database improvements
6. Maintaining lists of bugs utilizing the Iowa DNR's 'BugTracker.net' application that is provided to the Contractor
7. Verifying available and wanted materials submitted by the public
8. Coordinating the testing of fixes and new features within 10 days of the release.
9. Maintaining and prioritizing a list of future enhancements for the upcoming version of the database.
10. Maintaining Group Messages in the database

II. Reports

The Contractor shall submit monthly and final annual performance reports that have a narrative discussion of technical assistance services delivered, including, but not limited to:

1. All work conducted related to Section I above, Technical Assistance Services, for which the Contractor is seeking reimbursement
2. Training provided to the IWE program representatives
3. IWE services provided to IWE clients contacting the Contractor including number of contacts and services provided
4. Current status of open bugs from the 'BugTracker.net' application
5. Media related contacts received by or initiated by the Contractor related to the IWE, and number of client inquiries for IWE assistance received directly by UNI staff, and
6. Other services provided by the Contractor not listed above but that are related to the IWE.

Iowa Department of Natural Resources
Environmental Protection Commission

ITEM	**7**	**DECISION**
TOPIC	**Region XII Council of Governments - Grant Awardee for delivery of the Iowa Waste Exchange program**	

Recommendation:
The Department requests Commission approval of a renewed grant award, amended to the amount of $415,000, to the Region XII Council of Governments for a one year extension of the grant previously renewed last year, and with the option now of three additional year extensions, for the delivery of the Iowa Waste Exchange (IWE) program.

Funding Source:
This project is funded through the Groundwater Protection Fund, Solid Waste Account where monies are received from the tonnage fee imposed under Iowa Code section 455B.310. The specific allocation from the Fund directed to this grant is in Iowa Code section 455E.11 Ground Water Protection Fund Established Appropriations.

Background:
According to Iowa Code section 455E.11(2)(*a*)(2)(c), in the Groundwater Protection Fund, Solid Waste Account, out of the first $1.50 per ton collected:

> *Six and one-half percent [shall be used] for the department to establish a program to provide competitive grants to [one or more community colleges or councils of governments] for projects … related to a by-products and waste exchange system.*

Purpose:
Since 1990, the IWE has been a free, confidential, non-regulatory program that enables the recycling of used and unwanted materials by matching parties that have those materials with others who look to obtain and add value to such resources. The Grantee under this Agreement sub-contracts and supervises the work of regionally-based Resource Specialists. Performing the direct work of the IWE, Resource Specialists facilitate the waste exchange matches, as well as provide a range of services to help divert many thousands of tons of by-products and excess materials from Iowa landfills, help manage and reduce waste streams, and enhance pollution prevention.

Consulting Firm Selection Process:
On June 19, 2012, the Environmental Protection Council approved the award of an IWE grant, which provided for up to five annual renewal extensions depending on satisfactory performance by the Grantee, Region XII Council of Governments. On June 18, 2013, the Council approved the first extension renewal of this Grant Agreement.

Based on Iowa Code, and on the continued satisfactory performance by the Region XII Council of Governments, we request the second extension renewal of the Iowa Waste Exchange grant award as amended be approved**.**

Jennifer Wright, Supervisor
Land Quality Bureau
Environmental Services Division

May 23, 2014

Attachment: Agreement Statement of Work

STATEMENT OF WORK

The Iowa Waste Exchange (IWE) Grantee is principally responsible for the work of regionally-based Resource Specialists who provide to Iowa businesses, schools, hospitals, government institutions, industries, and individuals a range of services for diverting by-products and excess materials from Iowa landfills, managing and reducing waste streams, and enhancing pollution prevention.

I. Grantee Duties. With DNR approval, the Grantee recruits and subcontracts IWE Resource Specialists; directs and oversees their work; reviews and evaluates on-going performance. Grantee assures that the IWE Resource Specialists —

1. Actively search for generators and users of materials and promote the transfer and use of excess materials and by-products between generators and users.
2. Establish working relationships with the above-listed clients by:

- Responding to written or telephone requests from client groups for information or technical assistance on a variety of waste management issues no more than 2 business days after receiving the request
- Assisting customers and potential customers with opportunities and answers
- Conducting 'walk-through's of customer facilities to identify opportunities for improvement in the areas of waste management and pollution prevention
- Working with solid waste agencies to help them meet their waste diversion goals
- Identifying client needs and accessing the team of experts from the IWE, the Iowa Economic Development Authority (IEDA), the Iowa Waste Reduction Center (IWRC), and the DNR to help meet those client needs

3. Visit Solid Waste Alternatives Program (SWAP) projects, as requested; report site visit results to SWAP program managers; and provide technical assistance as requested.
4. Visit with communities having populations of 5,000 or less to assist with applications to the DNR's Derelict Building Program. Assist with subsequent diversion of materials from disposal in landfills.
5. Focus on achieving the optimum reduction in by-product generation and the landfilling of excess materials. Priority materials, in no particular order, are:

- Old corrugated containers and kraft bags
- Food and food processing residuals
- Plastic film/wrap/bags
- Mixed recyclable paper
- Demolition/renovation/construction debris
- Non-treated wood
- Compostable paper
- Renewable energy by-products
- Hazardous materials
- Industrial by-products/materials

6. Identify client operations that would benefit from DNR assistance regarding pollution prevention, financial and technical services, and help coordinate services delivery by inputting data in the IWE database.
7. Complete high-quality bi-weekly updates of the IWE program via the IWE database to reflect work activities and program-related outcomes.

II. Promotion and Information. In collaboration with the DNR, the Grantee assures that the IWE Resource Specialists —

1. Represent the DNR and its financial and business assistance programs by making presentations to public and professional groups on current waste management and pollution prevention programs and techniques
2. Engage in active sharing of materials uses and markets information with IWE program partners via e-mail, phone calls, and at quarterly meetings
3. Maintain familiarity with statewide needs and opportunities related to matching by-products
4. Inform clients of the environmental and economic benefits of recycling and reuse. Results may include customer's purchasing, process changes, and enhanced waste management practices through participating in the IWE program or other FABA programs.

5. Inform IWE clients of the services of the Iowa Waste Reduction Center and provide referrals as appropriate

6. Involve stakeholders in the delivery and promotion of the IWE program and in identification of customers that may benefit from the services of the IWE. Stakeholders include, but are not limited to, solid waste agencies, local governments, and local leaderships groups (i.e. city councils, local chambers of commerce, local industry and business groups)

7. Seek proactive opportunities for the IWE and its partners to assist in increasing recycling markets and in lowering operating costs for businesses by prompting waste reduction, recycling, and the exchange of materials through the IWE database and general IWE program.

8. Identify statewide recycling market gaps and market development opportunities for diversion of materials from Iowa landfills and other disposal sites

9. Identify barriers to business expansion opportunities related to the solid waste management system (ex. collection/processing)

10. Identify, on an ongoing basis, anticipated training needs for IWE customer groups and the role(s) the Grantee and subcontractors can undertake to address those training needs.

11. With the use of designated fiscal year 2015 grant funds, proactively promote, publicize and market the IWE through activities that include, but are not limited to:

- obtaining business cards and program brochures as needed
- placing print and broadcast ads (perhaps as modified Success Stories) in local news and public information outlets
- purchasing booth space at trade fairs and other exhibition events
- attending conferences where the IWE Resource Specialists would be able to make promotional/informational presentations
- helping sponsor Community Clean-up Days, E-Waste collections, etc.

III. Other.

1. Attend training sessions, seminars, and professional meetings.
2. Complete other special projects as directed or approved by the DNR.

IV. Grantee Tasks. In collaboration with the DNR, the Grantee—

1. Subcontracts for, and maintains, no less than 5.5 Full-Time Equivalent (FTE) Waste Exchange Resource Specialist positions to deliver statewide services across at least six contiguous service areas.

2. When subcontracting for Waste Exchange Resource Specialists, pays particular attention to Applicants' qualifications related to - •high productivity, •being team players, •interpersonal skills, •customer focus, and •technical competence.

3. Submits all subcontract Applicant resumes and pre-interview evaluations to the DNR for approval prior to commencing the interview process. The DNR's interests are represented in the interviewing process. All selected Applicants and interview summaries are sent to the FABA Supervisor prior to the offering of IWE Resource Specialist positions.

4. Provides quality supervision, management, leadership, training and mentoring for all of the Grantee's staff and subcontractors.

5. Ensures that IWE Resource Specialists update the data base on a bi-weekly basis. The Grantee is responsible for submitting the Quarterly Reports to the DNR.

6. Completes all Grant Agreement reporting requirements.

7. Delivers all tangible products listed in the Grant Agreement.

8. Works toward more efficient use of IWE program resources, including funding and program staff time, talents and expertise.

9. Provides feedback and recommendations to the DNR on means for improving the overall IWE program on a monthly basis.

10. Oversees consistent delivery methodologies and quality among all program service regions.

11. Requires attendance of all FTEs under this Grant Agreement to attend four quarterly meetings where these items will be discussed, but not limited to: progress on quarterly objectives, budget, roundtable discussion of problems and suggested solutions, training for professional development and other items as requested by the FTEs or the DNR.

12. When requested, meets with DNR, IEDA, and the IWRC to discuss program progress, budget items, progress on goals, primary duties listed in this RFP and other items as needed.

V. Tangible Products. The Grantee provides, on an annual basis:

1. Tracked progress toward the goal of diverting at least 100,000 tons of materials and by-products from Iowa landfills.

2. Coordinated and tracked delivery of additional services from the DNR's Financial and Business Assistance (FABA) section; particularly as to —

- Assisting with SWAP applications, or making referrals to local Councils of Governments for assistance in completing grant applications, or referring clients to SWAP staff.
- Promoting the Pollution Prevention (P2) Services and providing referrals to the P2 program managers and engineers.
- Assisting with Pollution Prevention Intern applications or referring to P2 engineers.
- Assisting with applications to the DNR's Derelict Building Program, and with the subsequent diversion of materials from disposal in landfills.

3. Completion of a combined minimum of 3,200 IWE client contacts, with the tracking of numbers per full-time equivalent employee (FTE) of both on-site visits to assist clients and in-house (telephone, email, letters, etc.) client assists.

4. Submittal to the DNR of at least one IWE success story per each of the primary service areas per year.

5. Quarterly reports that follow the format provided for IWE database information entry, submitted to the DNR. Quarterly reports are due the fifteenth day of the month immediately following the three months covered by the report. All quarterly reports must be submitted to the FABA IWE program manager. Quarterly reports must describe the performance of each IWE Resource Specialist, and record actions taken, or planned to be taken, for meeting Grant Agreement goals.

VI. Definitions for Statement of Work.

1. On-site visits include site visits to, and tours of, business facilities for purposes of offering assistance. A single client can be counted for multiple on-site visits, as long as each visit counted is a legitimate, new assistance initiative. An on-site visit does not include subsequent follow-ups by telephone, email or letters relating to the initial on-site visit.

2. In-house assistance includes calls, emails and letters to clients to provide assistance with a specific market referral or other specific business assistance information. A client can be counted as in-house assistance multiple times for legitimate, new assistance. In-house assistance does not include subsequent assistance via telephone, email or letter relating to the initial in-house assistance.

3. FABA goals can include the following activities: client referrals to the Pollution Prevention (P2) Services Program Manager or P2 Engineers; assistance with P2 intern applications; SWAP grant application assistance and SWAP site visits as assigned; assistance with Derelict building Program applications and with subsequent materials diversions.

Iowa Department of Natural Resources
Environmental Protection Commission

ITEM **8** **DECISION**

TOPIC: **Solid Waste Alternatives Program – Contract Recommendations**

The Department received 10 proposals requesting $205,130 in financial assistance during the April 2014, round of funding. The review committee selected each of the ten (10) projects for funding for a total of $194,371. One (1) proposal recommended for funding is greater than $25,000 awarding a total of $37,070 in a combination of a forgivable and zero percent loan.

The review committee consisted of five persons representing the Land Quality Bureau (2), Iowa Society of Solid Waste Operations (1), Iowa Recycling Association (1), and the Iowa Waste Exchange (1).

At this time, the Department is requesting Commission approval to enter into a contract with the selected applicant.

A description of the recommended project, the project type, the amount and type of funding assistance is attached.

Tom Anderson, Executive Officer II
Land Quality Bureau
Environmental Services Division

Attachment
a) Proposal descriptions

May 27, 2014

SOLID WASTE ALTERNATIVES PROGRAM
PROPOSAL RECOMMENDATIONS

The following provides a description of the projects for which Commission approval is requested.

Waste Commission of Scott County
11555 110th Avenue
Davenport, Iowa 52804

Forgivable Loan:	**$ 20,000**
0% Loan:	**$ 37,500**
Total Award Amount:	**$ 57,500**
Cash Match:	**$ 22,200**
Total Project Cost:	**$ 79,700**

Project Title: **Electronic Waste Reuse Program**
Contact: Kathy Morris **Phone:** 563-381-1300
Project Type: Best Practices
Applicant: Local Government
Description: The Waste Commission of Scott County has successfully operated an Electronics Demanufacturing Facility for the last ten years providing residents and businesses an environmentally sound disposal option for electronic waste such as computers, televisions, and other circuit board containing devices. They also are the first and only public agency in the world to receive certification by meeting the Responsible Recycling standards for proper management and auditing of e-waste recycling to ensure the highest levels of health and safety practices, data security policies, etc.

The market for refurbished electronics is rapidly increasing and the applicant is requesting funding assistance to expand into this market. Specifically, the applicant is requesting assistance for equipment and supplies to allow for the safe and secure refurbishment of such electronics as smartphones, tablets, laptops and flat panel televisions.

Service Area: Primary service area is Southeast and East Central Iowa

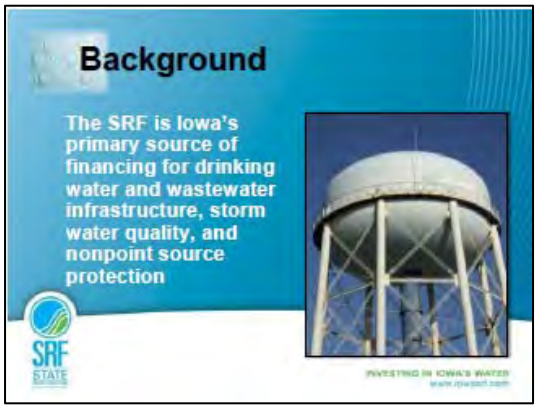
Iowa Department of Natural Resources
Environmental Protection Commission

ITEM **9** **DECISION**

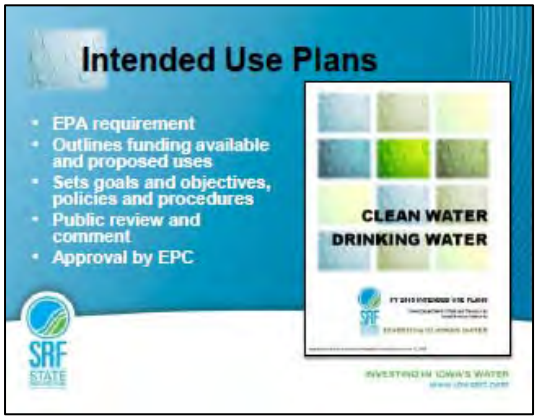
TOPIC **Clean Water and Drinking Water State Revolving Loan Fund – FY 2015 Intended Use Plans**

Commission approval is requested for the Clean Water State Revolving Fund (CWSRF) and Drinking Water State Revolving Fund (DWSRF) Intended Use Plans (IUPs) for FY 2015 (July 1, 2014 – June 30, 2015).

The CWSRF finances publicly owned wastewater and sewer facilities, storm water management for water quality, and nonpoint source control practices to keep pollution out of Iowa's water. The DWSRF covers water system projects, including source water, treatment, storage, and distribution and transmission, as well as consolidation and connections.



The Iowa SRF is operated through a coordinated partnership between the Department of Natural Resources (DNR) and the Iowa Finance Authority (IFA). DNR administers the environmental and permitting aspects of the programs, with IFA providing financial assistance including loan approval and disbursements. Other important partners include the U.S. Environmental Protection Agency (EPA), the Iowa Department of Agriculture and Land Stewardship, Soil and Water Conservation Districts, county sanitarians, participating lenders, and others.



The FY 2015 IUPs include plans of action for the SRF programs, including goals and objectives, an analysis of current and projected financial capability, financial management strategies, the project priority lists, discussion of set-aside programs and efforts, and planned uses for administrative accounts. The IUPs are developed and updated quarterly, in June, September, December, and March or more often as needed. Each draft IUP is released for public comment, and then presented for approval to the Commission. A public meeting was held May 8, 2014 to receive comments on the proposed IUP updates. No oral comments were provided at the hearing. The written comment period closed on May 15, 2014. Written comments were received from EPA Region 7 and were addressed in revised drafts.

The Sources and Uses tables for both CWSRF and DWSRF show that funds are available or obtainable to provide anticipated disbursements. The IUPs will be updated quarterly during FY 2015. Iowa continues to be able to fund all projects that are eligible for SRF assistance.

Patti Cale-Finnegan, DNR SRF Coordinator
Water Quality Bureau
May 20, 2014

CLEAN WATER
DRINKING WATER

FY 2015 INTENDED USE PLANS

Iowa Department of Natural Resources
Iowa Finance Authority

SRF STATE REVOLVING FUND

INVESTING IN IOWA'S WATER

Approved by the Environmental Protection Commission on June 17, 2014

CLEAN WATER
DRINKING WATER

FY 2015 INTENDED USE PLANS

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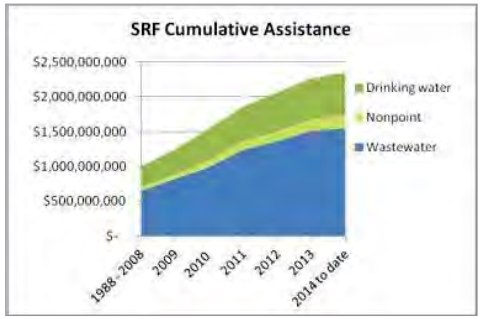
INTRODUCTION TO THE IOWA SRF

Iowans need clean water – to drink, to supply farms and industries, to provide recreation. Since 1989, the State Revolving Fund (SRF) has offered the financial resources to invest in Iowa's water.

Two point four billion dollars later, Iowa's SRF continues to provide financial assistance for water and wastewater infrastructure, agricultural best management practices, and other water quality projects.



These projects, whether carried out to meet regulations or to voluntarily reduce pollution, can be expensive for communities, landowners, and others. The SRF programs offer lower-cost financing tools to make these efforts both more affordable and more viable.

The success of the SRF programs is based on the partnerships formed to deliver the programs. The most important partnership is between the SRF and the assistance recipients. These are Iowa's cities, counties, rural water systems, sanitary districts, farmers, livestock producers, watershed organizations, and others. The SRF staff strives to provide effective financing tools, streamlined program procedures, and good customer service.

Another key partnership is between the federal government and the state. The U.S. Congress created the SRF programs in the Clean Water Act and the Safe Drinking Water Act and provides annual appropriations via the U.S. Environmental Protection Agency (EPA). Within the broad framework set by the legislation, federal

regulations, and EPA guidance, states have flexibility to set their own priorities and manage their own programs. In Iowa, that flexibility has allowed the SRF to target the specific needs of our state. For example, Iowa has one of the most varied and robust programs to address nonpoint source pollution in the nation.

Also partnering are the state agencies that administer the SRF programs. Iowa statute directs the Iowa Department of Natural Resources (DNR) and the Iowa Finance Authority (IFA) to jointly operate the SRF. DNR handles program prioritization, project permitting, environmental review, and EPA compliance. IFA covers financial management, issues bonds, and disburses loan funds. While each partner carries out their individual responsibilities, they coordinate on programmatic and financial strategies to make the most effective use of the funding.

Many SRF priorities could not be implemented without the involvement of other organizations. These partners include:

- The Iowa Department of Agriculture and Land Stewardship, which, under contract to DNR, administers loan programs for both agricultural and urban water quality practices. IDALS also is instrumental in advancing the Water Resource Restoration Sponsored Project effort.
- The Soil and Water Conservation Districts commissioners and staff from IDALS and the Natural Resources Conservation Service, who deliver loan programs at the local level and work directly with farmers, landowners, and others.
- County environmental health boards and staff, who participate in a program to help homeowners replace failing onsite septic systems.
- Watershed and land trust organizations, including the Iowa Natural Heritage Foundation, county conservation boards, and watershed management authorities, which make the critical links between water quality and other benefits such as flooding prevention, wildlife habitat, and outdoor recreation.
- More than 400 lending institutions across the state, who make low-costs loans available to borrowers through a linked deposit arrangement with the SRF.

Two federal acts authorized the SRF programs. The Clean Water Act created a loan program to protect the nation's lakes and rivers. The Clean Water SRF finances publicly owned wastewater and sewer facilities, storm water management for water quality, and nonpoint source control practices to keep pollution out of Iowa's water bodies.

Since 1989, the Clean Water SRF has committed almost $1.6 billion in below-market rate loans to meet Iowa's wastewater infrastructure needs. This includes more than 850 loans to cities, counties, sanitary districts, and utility management organizations.

In addition, since 2003, the Clean Water SRF has financed $172 million to address nonpoint source pollution. More than 4,000 separate loans have been made to farmers, livestock producers, watershed organizations, cities, rural homeowners, landfills, and others.

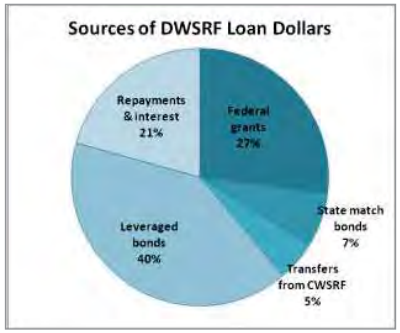
The Safe Drinking Water Act authorized the Drinking Water SRF, which covers water system projects, including source water, treatment, storage, and distribution and transmission, as well as consolidation and connections.

Since 2000, the Drinking Water SRF has committed $620 million in below-market rate loans to meet Iowa's water system infrastructure needs. This includes 450 loans to cities, municipal utilities, rural water associations, and homeowners' associations.

The federal legislation created the programs as revolving loan funds to provide an ongoing source of financing for the states' water and wastewater needs. Iowa's SRF draws on several sources of money to make loans. No state general funds are provided.

As shown in the diagrams, the funding sources include:

- Federal capitalization grants. Annually, since the Clean Water SRF was launched in 1988 and the Drinking Water SRF started in 2000, Congress has appropriated funds.
- State match bonds. Each state is required to provide a 20% match to the federal grants. Iowa obtains these funds through bonds issued by IFA.
- Leveraged bonds. States are allowed to issue additional bonds to generate more loan funds. Iowa has leveraged both SRF programs to keep up with the demand for loans.
- Loan repayments and interest income. All repayments and interest must be re-deposited in the SRF loan accounts, keeping the funds revolving.



In addition to the funds devoted to loans, there are several other accounts associated with the SRF programs. They are described in greater detail in the FY 2015 IUPs, but the following is an overview and summary:

- Administration Set-Aside. For both the Clean Water SRF and the Drinking Water SRF, the State of Iowa can use 4% of each federal capitalization grant for administration of the SRF programs.

- Other Set-Asides. There are three additional set-asides in the Drinking Water SRF which can be used for technical assistance to small public water supplies, capacity development, state water program activities, and source water protection. These three set-asides total 27% of the Drinking Water SRF capitalization grants. There are no corresponding set-asides in the Clean Water SRF.
- Loan Fees. Iowa's SRF charges origination fees and servicing fees on loans. The income from origination fees can only be used for SRF program administration, and supplements the 4% set-asides. A portion of the servicing fees also can only be used for the SRF programs. The remainder of the servicing fees, however, is considered "non-program" income. These funds can be used for other water quality or safe drinking water purposes.

Iowa's SRF staff is committed to transparency and accountability in the programs. The primary mechanism is the publication of the Intended Use Plans (IUPs). All IUPs as well as program rules go through public review and comment and approval by the Iowa Environmental Protection Commission. The U.S. Environmental Protection Agency also oversees the operation and performance of the SRF programs, conducting an annual program review and site visit.

An independent audit, conducted by the State Auditor's Office, is completed annually. Project and program milestones and information are reported through the EPA's CWSRF and DWSRF Environmental Benefits and Project Reporting databases on a quarterly basis. An annual report is prepared and published each fall. Iowa is also in compliance with the requirements for reporting in the Federal Funding Accountability and Transparency Act (FFATA).

The Intended Use Plans (IUPs) following this introduction provide a roadmap to the policies and procedures of the SRF programs, along with the lists of projects and activities to be funded. The IUPs outline the proposed management of the Clean Water SRF and the Drinking Water SRF during State Fiscal Year 2015 (July 1, 2014 – June 30, 2015). The IUPs are developed and updated quarterly, in June, September, December, and March or more often as needed.

The highlights of this year's IUPs include the following:

1. A new requirement that applicants engage a Municipal Advisor (MA) to analyze the financial position of the water or wastewater utility. For SFY 2015, all new SRF projects added to the Intended Use Plan (IUP) project lists will be required to engage a registered Municipal Advisor (MA). With the new federal laws and regulations regarding municipal advisors, the SRF Program will require borrowers to rely on registered MA's for financial advice.

   The MA will work with the community to analyze the current income and expenses of the utility, assist with setting rates and advise the community on financial planning. The SRF Program will pay up to $4,000 for eligible MA expenses. This subsidy is only offered the first time a community has a new project starting in FY15. MA expenses are eligible to be reimbursed from a Planning & Design loan. In the event a borrower does not close the SRF construction loan for the project, the SRF program will reimburse the applicant up to $4,000 for eligible work done by the MA. Relevant invoices will be required to receive the subsidy.

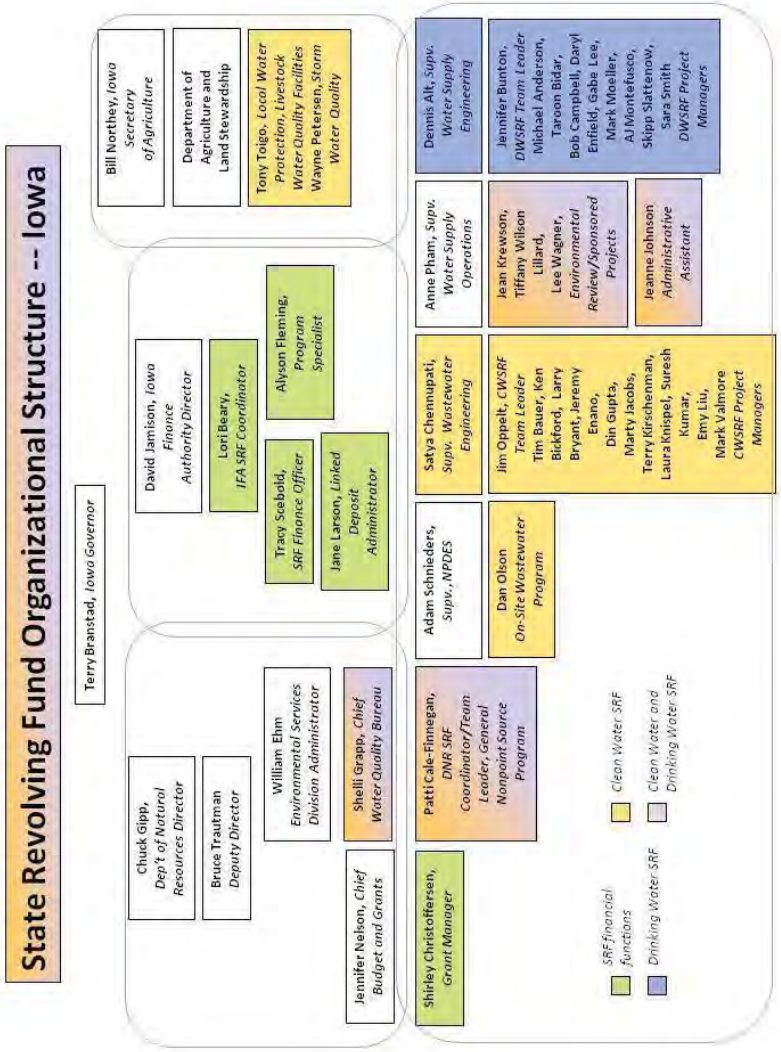
   In addition, an updated financial analysis will be required each year for three (3) years after the project is completed and then every five (5) years for the life of the SRF loan to demonstrate and ensure the financial health of the utility and satisfaction of the 1.10% debt coverage ratio requirement.

SRF borrowers will be asked to begin working with a MA as the project is being designed. We want communities, and their MA's, to have adequate time to update financial information, discuss rate increases, plan for future projects, etc. When a new project appears on the IUP, IFA will contact the borrower to gather basic information including, but not limited to, who the community will use as their MA.

This new policy is intended to give communities a financial incentive to use registered municipal advisor professionals to assist them with insuring the financial viability of their system. For those communities that regularly use a MA, they will receive one-time help paying for a portion of that service. For those that have not hired a MA, this policy will help mitigate a portion of the additional cost to the community.

2. Establishment of regular, semi-annual deadlines for Water Resource Restoration Sponsored Project applications. Two application rounds will be held each year, with deadlines in March and September to allow more communities an opportunity to apply.

3. The addition by the U.S. Congress of a new requirement for SRF recipients for the "Use of American Iron and Steel." Congress passed the requirement on January 17, 2014 and the U.S. EPA issued guidance on March 20, 2014. The EPA guidance includes several exemptions and waivers. Iowa's SRF will help determine eligibility for exemptions and provide information and education on compliance processes.



CLEAN WATER STATE REVOLVING FUND
FY 2015 Intended Use Plan

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CLEAN WATER STATE REVOLVING FUND
FY 2015 Intended Use Plan

I. STATE FISCAL YEAR 2015 PLAN OF ACTION

The plan is based on anticipated use of new and revolved funds available in the CWSRF for funding water quality protection needs, including both publicly owned wastewater infrastructure and nonpoint source water protection projects.

The CWSRF loan program consists of three main program areas. First, the purchase of debt obligations for wastewater and storm water projects is provided through the CWSRF to publicly owned facilities. Second, direct loans or linked deposit financing approaches address nonpoint source programs. Third, Water Resource Restoration sponsored projects, which address nonpoint source problems via interest rate reductions on wastewater loans.

The SFY 2015 Plan of Action covers the following areas:

- CWSRF goals and objectives;
- Current and projected financial capacity of the CWSRF;
- Financial management strategies;
- Plan for the SFY 2015 project priority list;
- Plan for nonpoint source set-asides; and
- Plan for use of administrative accounts.

CWSRF Goals and Objectives

The primary long-term goal of the Iowa CWSRF is to protect the environment and public health and welfare through a perpetual financial assistance program. The SFY 2015 short-term goals and objectives are as follows:

- Goal: Commit loan funds to as many recipients as possible in accordance with the state priority rating system, the IUP, staff resources, and available funding, in order to assist in the construction of projects with the highest water quality impacts. *Objective: During SFY 2015, quarterly updates to the IUP will be prepared to add projects and update program financial information.*

- Goal: Require applicants to engage a registered Municipal Advisor (MA). *Objective: During SFY 2015, all applicants submitting an Intended Use Plan application must demonstrate that they have hired an MA to assist with cash flows, rate setting, debt service coverage, and other financial aspects of their wastewater utility.*

- Goal: Implement the "Use of American Iron and Steel (AIS)" requirements enacted by Congress on January 17, 2014. *Objective: During SFY 2015, SRF staff will help applicants determine eligibility for the*

exemptions and waivers provided for in the Act and EPA guidance. SRF staff will provide information to those applicants required to comply on necessary documentation and inspection procedures.

- Goal: Fund green projects to meet the requirements of the Green Project Reserve. *Objective: During SFY 2015, the Iowa SRF plans to fund green projects equivalent to at least 10% of the FFY 2014 capitalization grant. Iowa has already complied with the GPR requirements in the FFY 2010 – 2013 cap grants.*

Dubuque, Iowa cogeneration facilities use waste products to produce electricity and heat.

- Goal: Apply additional subsidization available in FFY 2011 - 2013 capitalization grants to disadvantaged community projects and green projects. Identify additional projects as needed when the FFY 2014 cap grant is available. *Objective: During SFY 2015 SRF staff plans to approve plans and specifications and execute loans or loan amendments with loan forgiveness for the amounts required in the FFY 2011-2013 cap grants.*

- Goal: Promote and identify sustainable practices in projects proposed for funding. *Objective: During SFY 2015 SRF staff will provide information on the EPA's Sustainability Policy to applicants and include sustainability features in project descriptions.*

- Goal: Continue to implement the Water Resource Restoration Sponsor Program authorized in Iowa Code 384.84. *Objective: During SFY 2015, SRF staff will receive applications twice per year for sponsored project funding. Application deadlines will be in September and March. In conjunction with DNR 319 program staff, watershed coordinators, Iowa Department of Agriculture and Land Stewardship urban conservationists, and others, SRF staff will evaluate the applications and prepare a list of proposed projects for the IUP.*

Additional long-term goals include:

- Goal: Work with other state and federal agencies to coordinate water quality funding. *Objective: During SFY 2015, SRF staff will meet regularly with staff from the Community Development Block Grant program, USDA Rural Development, and the Watershed Improvement Review Board. In addition, SRF staff will work with DNR staff implementing disadvantaged community rules.*

- Goal: Apply program requirements that are simple and understandable and do not add unnecessary burdens to applicants or recipients. *Objectives: During SFY 2015 SRF staff will continue to assist applicants with completing the federal cross-cutting requirements for environmental and historical review. Staff will not be responsible for Davis-Bacon compliance but will advise borrowers as needed. Borrowers will be responsible for compliance and may hire outside consultants to assist.*

- Goal: Continue the option of extended financing terms for CWSRF infrastructure projects. *Objective: During SFY 2015 this option will be offered to current and new projects on the project priority list. Applicants seeking extended financing must complete a worksheet outlining the anticipated life of the project components, which can be averaged to determine the extended term.*

- Goal: Maintain mechanisms for funding the on-going administration of the program if federal funding is reduced or eliminated. *Objective: During SFY 2015 initiation and servicing fees will be collected on CWSRF loans for deposit to administrative accounts. SRF staff will develop short and long-term plans for administrative budgets.*

- Goal: Manage the CWSRF to maximize its use and impact through sound financial management. *Objective: During SFY 2015 SRF staff and financial advisors will continue to conduct financial analysis and develop innovative approaches to financial management.*

- Goal: Implement programs that effectively address water quality needs and target appropriate audiences. *Objective: During SFY 2015 SRF staff will continue to educate users and potential users about the program offerings through presentations, displays, program materials, and the IowaSRF.com website.*

Current and Projected Financial Capacity of the CWSRF

Appendix A, the Estimated Sources and Uses table, shows that funds are obtainable to fund current requests as of April 2014. The Iowa CWSRF program uses its equity fund to originate loans. When a sufficient number of loans have been made, the SRF program issues bonds, backed by those CWSRF loans, and uses the bond proceeds to replenish the equity fund. A bond issue will be completed in SFY 2015 and state match bonds for FFY 2014 capitalization grants will be issued at that time.

The leveraging capacity of the CWSRF is robust due to the maturity of the fund and the current loan portfolio. SRF staff has analyzed the future financial capacity of the CWSRF in light of the discussion over water quality standards and other future wastewater needs. Using relatively conservative assumptions, it is projected that the CWSRF could loan an average of $300 million per year over the next 10 years, or a total of $3 billion.

Financial Management Strategies

The CWSRF Project Priority List (attached) show total loan requests for wastewater projects of $345 million. Because many of these projects are in the planning phase, they are not expected to sign a binding loan commitment during this fiscal year. The projected timing and demand for loan draws is reflected in the sources and uses table (Appendix A). Other uses for CWSRF funds in SFY 2015 include $29.8 million for nonpoint source set-asides, and $2.9 million for ongoing program administration.

All previously awarded capitalization grants have been expended. Iowa will apply for the FFY 2014 capitalization grant when state match is available. The previous years' cap grants and state match amounts are shown below. State match bonds are issued at the same time that leveraged bond issues are done for greater cost effectiveness. The cap grant amounts are not always known at that time, so there is typically an overmatch that can be rolled into the next fiscal year's state match.

FFY 2012	Cap Grant Amount	State Match Needed	Excess State Match
CWSRF state match from December 2011 bond issue		$2,483,926	
Excess state match		$1,518,300	
Total CWSRF state match available		**$4,002,226**	
FFY 2012 cap grant	$19,128,000	$3,825,600	$176,626

FFY 2013	Cap Grant Amount	State Match Needed	Excess State Match
CWSRF state match from July 2013 bond issue		$3,600,328	
Excess state match		$176,626	
Total CWSRF state match available		**$3,776,954**	
FFY 2013 cap grant	$18,069,000	$3,613,800	$163,154

FFY 2014	Cap Grant Amount	State Match Needed	Excess State Match
CWSRF state match needed		$3,632,046	
Excess state match		$163,154	
Total CWSRF state match available		**$163,154**	
FFY 2014 cap grant	$18,976,000	$3,795,200	

The Iowa SRF is a leveraged program, with the debt service reserve financed by bond proceeds. EPA capitalization grant funds are not used for the debt service reserve. The cash draw procedure used is the direct loan method. State match is fully disbursed prior to drawing EPA capitalization grant funds. The EPA capitalization grant funds will be drawn at a 100% proportionality ratio.

SFY 2015 Project Priority List

The management of the CWSRF program includes a priority list of projects for loan assistance, which has been developed according to DNR rules 567 IAC 92 (455B).

With the available CWSRF funds, this IUP provides a projection of loan funding assistance for applications in priority order determined by point source rating criteria defined in 567 IAC 91 (455B). This priority list will be amended on a quarterly basis during SFY 2015. Chart 1 (attached) constitutes the project priority list.

The priority list has two major categories of projects: fundable and contingency. Fundable projects are defined as those that are following the wastewater construction permitting process and are making substantial progress toward fulfilling the permitting and SRF requirements. Contingency projects are those that have not followed the permitting process or are not moving toward funding readiness.

Due to the project workload and for planning purposes, the CWSRF staff evaluated projects that have been on the IUP list for more than three years. A notification was sent to the applicants that their project may be dropped if there is no progress in the six months following the notice. If a project is dropped, the applicant may reapply when the project is ready to move ahead.

For program planning purposes, the fundable projects are further identified as "R – ready for loan" (indicating that the construction permit and environmental review have been completed), and "P – in planning."

The following categories of projects will be included for funding during SFY 2015 and are included on the CWSRF Project Priority List:

Unfunded Prior Years' Section 212 Projects: These are loan requests remaining on the project priority list from previous years' IUPs. It is Iowa's intention to make CWSRF loans to these projects during SFY 2015 if they are ready for a binding loan commitment.

Segments of Previously Funded Section 212 Projects. State rules provide that subsequent segments of a project, which has previously received funding priority or assistance, be placed on the project priority list ahead of new projects. Segmented projects will be added to the SFY 2015 project priority list as received.

The City of Hampton will replace its outdated wastewater treatment facility.

New Section 212 Projects. New applications for assistance during SFY 2015 will be added to the project priority list. Applications will be accepted on a continuous basis during SFY 2015 with quarterly updates completed as needed.

Supplemental Financing. Supplemental financing for projects listed in previously approved IUPs are added to the IUP as they are requested unless the additional funds will be used for improvements that would significantly change the scope of the project. Additional environmental review may be required. Supplemental loans will not be provided for changes that are ineligible for funding.

Contingency Projects. Contingency projects are those that have not followed the permitting process or are not moving toward funding readiness. Projects can be moved from contingency to active status whenever they are determined to be in sync with the permitting process or have become active. An active project can be moved to contingency status if it is determined that the project is not progressing in a timely manner.

Planning and Design Loans. Planning and design loans are provided at 0% interest for up to three years to cover the costs of preparing facility plans and project specifications. The loans will be rolled into CWSRF construction loans or repaid by another source of permanent financing.

Capitalization Grant Requirements. The FFY 2010 - 2014 capitalization grants include requirements for certain percentages of the funds to be allocated for green projects and for additional subsidization.

	2010	2011	2012	2013	2014	TOTAL
CW Cap Grants	$27,528,000	$19,985,000	$19,128,000	$18,069,000	$18,976,000	$103,686,000
CW GPR	$ 5,515,000	$ 3,997,000	$ 1,912,800	$ 1,806,900	$ 1,897,600	$ 15,129,300
CW Add Subs Minimum	$ 4,129,860	$ 1,851,928	$ 1,063,065	$ 851,127	$ 1,032,630	$ 8,928,610
CW Add Subs Maximum	$13,766,200	$ 6,173,093	$ 1,594,597	$ 1,276,691	$ 1,548,944	$ 24,359,525

The following outlines the amounts and the projects that have been or will be counted for each cap grant. The highlighted projects met the qualifications for the Green Project Reserve. Not all GPR project received loan forgiveness. The remaining projects met disadvantaged criteria. The projects for which additional subsidization has been committed but which have not signed loan agreements as of March 2014 are shown in bold.

Project	Current Request	Loan Amount	Amount Green	Amount Add Subs	Grant Year Reported
Charles City		1,400,000	1,400,000	420,000	2010
Lohrville		3,724,000		1,117,200	2010
Spirit Lake		103,000	103,000	30,900	2010
Conesville		1,350,000		230,689	2010
Ocheyedan		2,065,000		227,398	2010
Terril		1,077,000		335,400	2010
Odebolt		1,599,000		319,800	2010
Odebolt		500,000		100,000	2010
McCallsburg		810,000		147,400	2010
Washington		16,316,000		1,000,000	2010
Walker		2,158,000		431,600	2010
Nonpoint Source		1,975,574	1,975,574		2010
Nonpoint Source		10,024	10,024		2010
Nonpoint Source		1,435,320	1,435,320		2010
Nonpoint Source		189,874	189,874		2010
Nonpoint Source		403,000	403,000		2010
Pisgah		650,000		195,000	2010
Meriden		329,000	64,485	12,897	2011
Dubuque (sponsored)		9,400,000	9,400,000	-	2011
Nonpoint Source		827,000	827,000		2011
Albert City	2,787,264	400,000		120,000	2012
Dubuque (methane)		3,048,000	3,048,000		2012
Nonpoint Source		647,700	647,700		2012
Nonpoint Source		129,420	129,420		2012
Nonpoint Source		98,940	98,940		2012
Nonpoint Source		300,000	300,000		2013
Nonpoint Source		342,000	342,000		2013
Nonpoint Source		2,835,000	2,835,000		2013
Coralville (Status: complete)	***1,600,000***		***1,600,000***	***480,000***	***2013***
Dubuque (Upper Bee Branch) (Status: Bidding spring 2014)	***28,823,000***		***28,823,000***	***4,430,100***	***2011***
Ottumwa (Richmond Ave area) (Status: out to bid)	***3,636,000***			***1,090,800***	***2012***
TOTAL	**40,458,580**	**54,122,852**	**53,632,337**	**10,844,816**	

Water Resource Restoration. In 2009, the Iowa General Assembly amended Iowa Code chapter 384.84 to add a new category of projects that can be financed with sewer revenues. This new category, called "water resource restoration" sponsored projects, includes locally directed, watershed-based projects to address nonpoint source water quality issues.

On a typical CWSRF loan, the utility borrows principal and repays principal plus interest. On a CWSRF loan with a sponsored project, the utility borrows for both the wastewater improvement project and the sponsored project. The overall interest rate on the total amount of principal borrowed is reduced so that the utility's ratepayers do not pay any more than they would have for just the wastewater improvements. Instead, two water quality projects are accomplished for the cost of one.

Permeable paving will infiltrate storm water and beautify Clinton's "second downtown."

During SFY 2013 and 2014, a pilot project and the first round of applicants were chosen. Those projects are in the planning and design stage with most to be under construction summer 2014.

A second application round was held January – March 2014. Thirteen applications were received with requests totaling $7 million. The applications were reviewed for completeness based on the criteria published in the SFY 2014 IUP and on the application instructions published in January 2014.

The following applications are recommended for funding:

SRF Number	Applicant	Project Description	Project Partners
WRR14-008	City of Albert City	Drainage District 34 Lateral No. 2 - green infrastructure, ag erosion controls	IDALS, Buena Vista SWCD
WRR14-003	City of Ames	Squaw Creek - implement green infrastructure practices in ultra-urban area	Squaw Creek Watershed Management Authority, Story SWCD, Prairie Rivers of Iowa, Ames High School, IAMU, Iowa Storm Water Education Program
WRR14-013	City of Epworth	Whitewater Creek - green infrastructure	Dubuque SWCD, IDALS
WRR14-012 (A, B, and C)	City of Fairfield	Crow Creek - stream corridor stabilization, green infrastructure, ag erosion controls	Jefferson SWCD, Maharishi University of Management, Leopold Group of the Sierra Club, Jefferson County Trails Council, Michael and Diane Porter (landowners),
WRR14-004	City of Hampton	Cedar River - stream corridor stabilization, green infrastructure, flood plain restoration	Franklin SWCD, Franklin Co. Board of Supervisors, Hampton-Dumont Community School District, Franklin County Conservation Board, Greater Franklin County Chamber of Commerce
WRR14-006	City of Keokuk	Mississippi River - green infrastructure	IDALS
WRR14-010	City of Kiron	East Otter Creek - green infrastructure	IDALS, Crawford SWCD, NRCS
WRR14-009	City of Rockwell	Lake Creek - green	IDALS, Calhoun SWCD

	City	infrastructure	
WRR14-007	DNR State Parks	Lake Geode - wetland restoration	Des Moines SWCD, Henry SWCD
WRR14-001	Wastewater Reclamation Authority	Fourmile Creek - implement "Stream Corridors" recommendation in Four Mile Creek Watershed Plan	Polk SWCD, Fourmile Creek Watershed Management Authority, Polk County Conservation Board, City of Ankeny, City of Pleasant Hill
WRR14-002	Wastewater Reclamation Authority	Fourmile Creek - implement "Stream Corridors" recommendation in Four Mile Creek Watershed Plan	Polk SWCD, Fourmile Creek Watershed Management Authority, Polk County Conservation Board, City of Ankeny, City of Pleasant Hill

The next application deadline is September 2, 2014 for inclusion in the SFY 2015 third quarter IUP update. The same requirements as the March 2014 deadline apply.

- For loans up to 20 years, the interest rate on the combined infrastructure/sponsored project loan will be reduced to not lower than 0.75%. The equivalent of the amount that would be generated by a 1% interest rate (approximately $100,000 per $1 million borrowed) will be available for eligible sponsored project costs. Loans between 20-30 years can also be used but the dollar amount for sponsored projects will also be $100,000 per $1 million.

- The amount set aside for interest rate reductions for the in FY 2015 is $10 million (on up to $100 million worth of future CWSRF infrastructure loans). If sponsored project requests exceed that amount, DNR reserves the right to cap the dollar amount of a single project to a percentage of the total allocated.

Eligible applicants include the following:

1. Applicants submitting sponsored project applications at the same time as their wastewater infrastructure Intended Use Plan application. The wastewater IUP application must be complete and eligible to be placed on the fundable list.

2. Applicants with wastewater projects already included on the fundable list of the CWSRF Intended Use Plan which are still in the "Planning" phase.

The following will disqualify an applicant for pursuing a sponsored project:

1. The sponsored project application is submitted with an incomplete wastewater IUP application. The wastewater IUP application packet includes a checklist for determining a project's readiness to be placed on the Intended Use Plan. Sponsored project applications submitted with incomplete wastewater IUP applications will not be considered.

2. The applicant's wastewater project has reached the "Ready for Loan" milestones as of the sponsored project application deadline. This classification on the IUP project list indicates that construction permits have been issued, environmental review is complete, and in some cases, that the project has gone out to bid. Applicants may not delay their wastewater project construction or financing in order to apply for a sponsored project.

3. The wastewater loan has already been executed.

Detailed requirements for FY 2015 sponsored project applications are explained on Page 23.

Plan for Nonpoint Source Set-Asides

Iowa authorizing legislation and state administrative rules allow the use of CWSRF funds for nonpoint source pollution control projects. Four set-asides for nonpoint source program assistance have been established which target areas of need allowed under federal guidance and identified in the state nonpoint source water quality management plan:

- The On-Site Wastewater Systems Assistance Program (OSWAP), providing loans to homeowners to replace inadequate septic systems. New systems are certified by county sanitarians and loans are made through participating lenders through a linked deposit arrangement.

- The Local Water Protection (LWP) Program, addressing soil, sediment, and nutrient control practices on agricultural land. DNR contracts with the Iowa Department of Agriculture and Land Stewardship, which operates the program through local Soil and Water Conservation Districts. Loans are made through participating lenders through a linked deposit arrangement.

Agricultural terraces are just one of the soil erosion practices farmers can finance.

- The Livestock Water Quality Facilities (LWQ) Program, assisting livestock producers with manure management plans, structures, and equipment. Facilities with under 1,000 animal unit capacity are eligible. DNR contracts with the Iowa Department of Agriculture and Land Stewardship, which operates the program through local Soil and Water Conservation Districts. Loans are made through participating lenders through a linked deposit arrangement.

- The General Nonpoint Source (GNS) Program, for a wide variety of other water quality protection efforts. Projects include habitat and wetland restoration, landfill closure, lake restoration, and watershed planning. Funding for Storm Water Best Management Practices loans are also included in this set-aside amount.

Individual projects under the GNS program that involve purchase of land must be approved by the Environmental Protection Commission. Two projects are proposed this quarter by the Iowa Natural Heritage Foundation.

Project	Description	Water Quality Benefit	Loan Amount
Cedar River – B&L Enterprises Property – Johnson County	Purchase of 173 acres of wooded floodplain, wetland and remnant sand prairie, and cropland adjacent to the Cedar River Crossing	This section of the Cedar River is listed Category 5a on the Iowa Impaired Waters Report. It is impaired for bacteria and is not supporting is primary, recreational use. Acquisition of this property will permanently protect one mile of the	$791,000

	Conservation Area	western shoreline of the river. Protection and restoration of the floodplain will mitigate flooding, and maintaining the property as native woodland and wetlands will allow it to continue to provide essential ecosystem services of providing habitat, slowing runoff, and filtering pollutants from surrounding agricultural lands.	
Coldwater Creek and Upper Iowa River – Coldwater Creek Addition – Winneshiek County	Purchase of 56 acres of natural area along the creek and steep slopes with 29 acres currently in row crops upland, adjacent to the Coldwater Creek Wildlife Management Area and Coldwater Spring State Preserve	Coldwater Creek is a popular trout stream which supports natural reproduction of brown trout. The Creek also feeds the Upper Iowa River, which is a state-designated Protected Water Area. This stretch of the Upper Iowa was recently added to the Impaired Waters Report as 5b, not recommended for recreational use due to high levels of E. coli bacteria. Permanently protecting Coldwater Creek from runoff and pollutants will improve it as well as the Upper Iowa Watershed.	$365,000

The table below outlines the current and proposed set-aside amounts planned for the four programs. These set-aside amounts may be amended based on need and the financial capacity of the CWSRF.

Program	Proposed SFY 2015 Set-Aside Amount
Onsite Wastewater Assistance Program (OSWAP)	$1.8 million
Local Water Protection Program (LWPP)	$8.0 million
Livestock Water Quality Facilities Program (LWQ)	$10.0 million
General Nonpoint Source Program (GNS)	$10.0 million
TOTAL	**$29.8 million**

Plan for Use of Administrative Accounts
There are three distinct funding sources for CWSRF administrative expenses:

- The CWSRF administrative set-aside. Iowa intends to take or reserve 4% of the federal capitalization grant funds for program administration. The Iowa SRF program did not take any administrative set-aside from the ARRA capitalization grant. The administrative set-aside of $2,122,000 from the ARRA cap grant is reserved for future use. Any unused administration commitments from other capitalization grants are reserved for use in future years as necessary should capitalization grants be reduced, or actual costs increase.

- Loan initiation fees. A 0.5% loan origination fee will be charged on new CWSRF loans. The maximum amount to be paid will be $100,000. Under EPA rules, because Iowa's origination fees are financed through the loans, the proceeds are considered program income. Program income can only be used for

the purposes of administering the CWSRF program or for making new loans. There is approximately $6 million available in funds considered program income. A portion of these funds will be used in SFY 2015 for program administration, and the remainder will be reserved for future administrative expenses.

- Loan servicing fees. A fee of 0.25% on principal is charged on CWSRF loans. Under EPA rules, only servicing fees charged on loans made above and beyond the amount of the capitalization grant and fees collected after the capitalization grant under which the loan was made has been closed are considered non-program income. Non-program income can be used to administer the program or for other water quality purposes. The uses of non-program income are discussed below.

Program Income. CWSRF program expenses are currently approximately $2.6 million per fiscal year. This includes the work of wastewater engineering section project managers, specialists in environmental review, nonpoint source program administrators, financial officers, loan coordinators, and program managers. It also covers expenses for financial and legal advisors.

Non-Program Income. There is approximately $5.8 million available in funds considered non-program income. The DNR proposes the following uses for a portion of these funds during SFY 2015:

Purpose	Explanation	Amount
To support wastewater compliance activities	SRF non-program income will be used in place of state general fund dollars for three FTEs in the field office wastewater staff. The field offices will be doing inspections to ensure compliance with the NPDES permit, assisting permit holders with staying in compliance with their permit, investigating complaints from the public related to wastewater treatment and offering technical assistance to wastewater facility operators. Another task is working with unsewered communities to become properly sewered.	$328,000
To provide staffing in the Water Quality Bureau	This funding will replace state general funds for up to three environmental engineers that review construction projects in the Wastewater Engineering section, up to four permit writers in the National Pollution Discharge Elimination System (NPDES) section, half the time of a business analyst to update Bureau databases, and engineering interns.	$885,000
	TOTAL	**$1,213,000**

An estimated additional amount of $400,000 may be needed from this account for wastewater program expenses in FY 2015.

II. INFORMATION ON THE CWSRF ACTIVITIES TO BE SUPPORTED

Allocation of Funds
Allocation of funds to eligible projects was based on a four-step process:

1. The amount of financial assistance needed for each application was estimated;
2. The sources and allowable uses of all CWSRF funds were identified; and

3. The CWSRF funds were allocated among the projects, consistent with the amount available and the financial assistance needed.
4. A designated amount was selected as reasonable and manageable for each set-aside.

Information pertinent to each CWSRF project is contained in Chart 1, pursuant to Section 606(c)(3) of the Clean Water Act.

Sources and Uses of Available CWSRF Funds
Appendix A to the Intended Use Plan illustrates potential sources and uses of funds in the CWSRF for SFY 2015. As shown, all pending loan requests and program administration needs can be funded. Projects will draw on their funding at different intervals based on their construction cycles. These differences are used to estimate cash needs throughout the year. Appendix A will be updated quarterly as needed to provide an ongoing view of the financial plan for meeting loan requests.

Section 212 Projects Program Policies

Project Scope. The scope of the project must be outlined on the Intended Use Plan application and in the facility plan. Changes to the scope are allowed prior to loan closing. Significant changes in scope may cause delays if additional work is required by the project manager or environmental review specialist. Once a loan is signed, only minor changes to the scope will be allowed and only if they do not require additional technical or environmental review.

Loan Interest Rates. The interest rates for construction loans made from the CWSRF are as follows:

Loan Term	Applicant Type	Interest Rate	Servicing Fee	Total	Additional Information
Standard (up to 20 years)	All	1.75%	.25%	2.00%	
Extended (21 to 30 years based on useful life)	Disadvantaged	1.75%	.25%	2.00%	Communities must be determined to be disadvantaged based on criteria in Iowa Code section 455B.199B, Disadvantaged Communities Variance, as amended by Senate File 407 on April 28, 2011.
Extended (21 to 30 years based on useful life)	Non-Disadvantaged	2.75%	.25%	3.00%	

Interest rate for CWSRF planning and design loans will be 0% for up to three years.

Loan Fees. A 0.5% origination fee is charged on the full loan amount for new CWSRF construction loans, with a maximum amount of $100,000. No origination fees will be charged on planning and design loans. A .25% servicing fee will be charged on construction loans. Payment of the loan servicing fee is semi-annual with interest payments for all new SRF loans. Loan servicing fees are only charged on the principal amount disbursed during construction (not the entire original loan amount).

Financing Term. The financing term will be up to 30 years. Current and new projects on the project priority list may request an extended term. The length of the term will be based on calculation of the average useful life of the entire project, to be determined by the applicant's consulting engineer and approved by DNR.

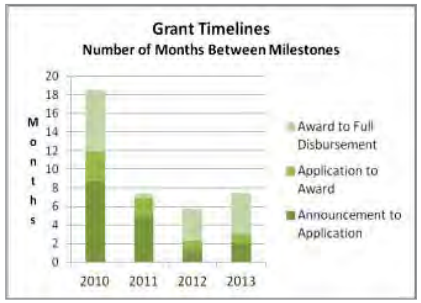
Maximum Financing. There is no maximum financing amount.

Project Readiness. Applicants cannot be offered assistance until they meet program requirements.

Funding Limitations. Pending loans identified in this IUP do not exceed funds obtainable for the CWSRF program. These estimates are based on the projections that, for projects that have completed program requirements and are ready for funding, only 55% of the loan amount will be disbursed this fiscal year. For projects that are currently in the planning phase but may be ready for funding during SFY 2015, it is projected that only 30% of total funds will be disbursed this fiscal year.

Plan for Efficient and Timely Use of CWSRF Funds
The State of Iowa's Clean Water State SRF uses federal capitalization grant funds as expeditiously as possible. There are several milestones that affect the grant timeline:

- When Congress finalizes appropriations and EPA announces funding availability;
- When the State submits a grant application;
- When EPA awards the grant funds; and
- When the grant funds are fully disbursed.



The timeline in Iowa has been reduced significantly, as shown in the graph.

Iowa has been able to use its federal capitalization grant funds in a timely way due to a robust and sustained demand for loans. Iowa's annual loan commitment amounts have increased from an average of $30 million per year to an average of $200 million in recent years.

A number of program features have spurred the growth in loan demand. These include:

- Improvements and streamlining in the wastewater construction permitting process, which reduced timelines for project review and approval;
- Allow applicants to pursue phased approach for projects to enable individual phased projects proceed timely to construction instead of waiting on approval on a large project;
- Planning and design loans at 0% interest for three years to provide upfront capital to get projects started and ready for construction and loan closing;
- Year-round application process with quarterly updates to the Intended Use Plan, which keeps projects in the loan pipeline on a continual basis;

- Expansion of nonpoint source and green infrastructure programs to include loans for farmers, livestock producers, watershed organizations, and others;
- Extended term financing, based on project useful life, which allows more utilities to benefit from the CWSRF;
- Environmental review services to complete assessments of impacts to natural and cultural resources, reducing costs and barriers to participating in the loan program; and
- Focus on marketing, customer and consultant education, and coordination with other funders.

SRF environmental review specialists consult with Native American tribes and other parties concerned with the land.

Financial management also contributes to the timely use of federal funds. The Iowa CWSRF program uses its Equity Fund to originate new loans. This fund consists of principal and interest repayments. When additional funds are needed, the SRF program issues bonds, backed by those CWSRF loans, and uses the bond proceeds to replenish the equity fund.

Iowa's SRF program generally issues bonds annually. These bond issues include the state match for the next federal capitalization grants. After the bonds are issued, the state match is spent first so the cap grant can be drawn down at 100% when it is received. Several large projects are selected to receive cap grant disbursements. That allows the cap grant to be drawn down more quickly. Loan disbursements are made weekly. Iowa's CWSRF disbursements average $12 million per month. The FFY 2013 CWSRF cap grant was $18,069,000.

The practices described above are currently working well for Iowa and will be continued through FY 2015.

Water Quality Management Planning
A reserve for water quality management planning as required by Title VI of the Clean Water Act will be set aside from Iowa's Title VI allotments and granted to the state for this purpose separately from the CWSRF. This reserve does not appear in this IUP as it has been already deducted from Iowa's allotment and taken into account in projecting Iowa's available capitalization grant.

SEE Salary Funds Deducted from Cap Grant
The Iowa DNR may request U.S. EPA to deduct funds from its FFY 2014 capitalization grant which could be included in Iowa's next grant application to EPA after receiving notification of availability of the CWA Title VI Funds and evaluating the state allotment amount. These positions could be filled by EPA Region 7 and assigned to the DNR's Wastewater Engineering section to provide technical and administrative assistance to the CWSRF projects and program. The SEE enrollees could help provide staffing at Iowa DNR to maintain the CWSRF program and keep up with the increasing CWSRF project technical and administrative work load. Authorized under the Environmental Programs Assistance Act of 1984 (PL 98- 313), the SEE program is intended "to utilize the talents of older Americans in programs authorized by other provisions of law administered by the Administrator in providing technical assistance to Federal, State, and local environmental agencies for projects of pollution prevention, abatement, and control."

III. ASSURANCES AND SPECIFIC PROPOSALS

Iowa will provide the necessary assurances and certifications according to the Operating Agreement between the State of Iowa and the U.S. EPA. Iowa's Operating Agreement was amended in April 2007.

IV. CRITERIA AND METHOD FOR DISTRIBUTION OF FUNDS

Section 212 Infrastructure Projects
The following approach was used to develop Iowa's proposed distribution of CWSRF funds for Section 212 infrastructure projects: (1) analysis of the priority of communities applying and financial assistance needed; (2) identification of the sources and spending limits of available funds; (3) allocation of funds among projects; (4) development of a payment schedule which will provide for making timely binding commitments to the projects selected for CWSRF assistance; and (5) development of a disbursement schedule to pay the project costs as incurred.

Allocation of Funds Among Projects. All projects listed in the CWSRF Project Priority List (attached) are eligible for assistance and may be funded from the CWSRF subject to available funds.

All projects scheduled for funding with Iowa's CWSRF will be reviewed for consistency with appropriate plans developed under sections' 205(j), 208, 303(e), 319 and 320 of the Clean Water Act, as amended. Evidence of this review and finding of consistency will be documented in each CWSRF project file. Should a project fail to meet this review criterion, it may be bypassed as allowed by State rules. The Project Priority List provides for contingency projects, which may be considered for loan assistance as bypass projects according to state rules without formal amendment of this intended use plan.

Priority of Communities and Financial Assistance Needed. Iowa law provides only for loan assistance. Additional subsidization required by the FFY 2010-2013 capitalization grants will be through forgivable loans. The state's CWSRF rules identify the priority rating system used to establish priorities for loan assistance.

Nonpoint Assistance Programs
Nonpoint source assistance includes set-asides for the Onsite Wastewater Assistance Program (OSWAP), Livestock Water Quality Facilities (LWQ), Local Water Protection (LWP) and General Nonpoint Source (GNS). These funds implement the intent of Iowa statute to use CWSRF funds to improve residential wastewater systems, to assist owners of existing animal feeding operations to meet state and federal requirements, for local water protection projects that will provide water quality improvement or protection and for general nonpoint source projects that will provide water quality improvements or water quality protection. These systems are addressed as a need by Iowa's State Water Quality Management Plan. Individual loan applicants for all set-asides are not identified in this IUP. These programs will be operated as linked deposit, loan participation, or direct loan programs.

Water Resource Restoration Sponsored Projects – FY 2015 Requirements
Sponsored project applications may be submitted by the following:

- Applicants submitting sponsored project applications at the same time as their wastewater infrastructure Intended Use Plan application. The wastewater IUP application must be complete and eligible to be placed on the fundable list. **Next deadline: September 2, 2014.**

- Applicants with wastewater projects already included on the fundable list of the CWSRF Intended Use Plan which are still in the "Planning" phase. **Next deadline: September 2, 2014.**

Wastewater utilities are required to include local watershed organizations, Watershed Management Authorities, County Conservation Boards, and/or Soil and Water Conservation Districts in the planning and implementation of sponsored projects. These organizations provide technical assistance and expertise for water quality projects.

Wastewater utilities interested in conducting a sponsored project will use the standard CWSRF Intended Use Plan application for the infrastructure project. The separate CWSRF sponsored project application must also be completed and submitted, along with the following attachments:

Neighbors of Ravine Park in Sioux City are active in helping determine the goals of the water quality efforts.

- Authorizing resolution passed by the wastewater utility's governing board for the sponsored project application;
- If there is a third-party entity involved, the 28E agreement between the utility and the qualified entity;
- Letter of endorsement from the appropriate water quality organization, outlining the organization's participation in project design, selection, and implementation (see above)
- Letters of support from other project partners;
- Letter from the wastewater utility's bond counsel indicating concurrence with the sponsored project concept;
- Project conceptual plans, including:
    - Assessment of the impacted waterbody and its watershed with data that supports the identification of the water quality problems to be addressed
    - Discussion of project goals and objectives
    - Evaluation of possible water quality practices that could be implemented, considering the unique demographic, topographic, hydrologic, and institutional characteristics of the planning area, along with a rationale for the selected practices
    - Description of practices to be implemented with the expected water quality outcomes
    - Discussion of project locations, land ownership, and any plans for acquiring properties or easements
    - Identification of any other organizations or resources to be involved in the project and their expected contributions
    - Proposed project schedule with major milestones, along with a discussion of how the sponsored project construction schedule coordinates with the infrastructure project schedule
    - Proposed evaluation procedures and measures
    - Explanation of the proposed budget, including other planned funding sources and flexibility to adjust budget according to final amount available through sponsored project mechanism

V. METHOD OF AMENDMENT OF THE INTENDED USE PLAN

This IUP will be followed by the State in administering CWSRF funds in SFY 2015. Federal and state law requires, and Iowa welcomes, opportunity for public participation in the development of the IUP. Any revisions of the goals, policies and method of distribution of funds, must be addressed by a revision of the IUP, including opportunity for public participation. Updates to the IUP to add projects to the priority list, to make program changes, or to adjust dollar amounts in set-asides, will be made quarterly as needed. Minor adjustments in funding schedules, loan amounts and use of bypass provisions including funding of projects on contingency

status are allowed by the procedures of this IUP and state rules for administration of the CWSRF without public notification.

VI. PUBLIC REVIEW AND COMMENT

A public meeting to allow input to Iowa's SFY 2015 IUP and Project Priority List was held May 8, 2014, 10:00 a.m., at the Wallace State Office Building, Conference Room 5E, 502 E. 9th Street, Des Moines. This meeting was announced in a notice provided to stakeholder organizations representing city officials, consulting engineers, county governments, councils of government, area planning agencies, US EPA Region VII and other groups which might have an interest. There were no attendees. The public comment period was pen until May 15, 2014. The U.S. EPA, Region 7 requested that a table showing state match for the recent capitalization grants be included in the IUPs. The table has been added.

VII. PROJECT PRIORITY LIST

The CWSRF Project Priority List is included in a separate, sortable Excel file.

APPENDIX A
Iowa CWSRF State Fiscal Year 2015 1Q
Estimated Funding Sources and Funding Uses
As of 4/11/14

Funding Sources		
Funds Available in Equity Fund and Program Accounts	$130,779,000	*
FFY 2013 Capitalization Grant	$0	
State Match for FFY 2013 Capitalization Grant (Fully Disbursed)	$0	
FFY 2014 Capitalization Grant	$18,976,000	
State Match for FFY 2014 Capitalization Grant	$3,795,000	
Issuance of Leveraged Bonds in FY15	$42,411,000	
Equity Fund and Program Interest Earnings	$300,000	
Loan Repayments	$71,000,000	
Funds Released from Indentures to Equity Fund (available for loans)	$8,756,000	
Total Funding Sources	**$276,017,000**	

Funding Uses	
Undisbursed Amounts Committed to Existing Loans (60% disbursement rate)	$44,096,000
Section 212 Project Requests (FNSI/CX issued; 55% disbursement rate)**	$89,598,000
Section 212 Project Requests (FNSI/CX not issued; 30% disbursement rate)**	$47,605,000
Planning & Design Requests (50% disbursement rate)	$4,532,000
Non-Point Source Program Assistance	$29,800,000
Principal Payments on Outstanding Bonds	$28,985,000
Interest Payments on Outstanding Bonds	$28,520,000
Program Administration From FFY 2014 Capitalization Grant (Estimated)	$759,000
Program Administration From ARRA Capitalization Grant	$2,122,000
Total Funding Uses	**$276,017,000**

* Funds Available for disbursements as of 4/11/2014

** Loan disbursement rates are estimated based on previous experience with project pace. For projects that currently have not had a Finding of No Significant Impact or Categorical Exclusion issued, it is expected that up to 30% of the total project amounts may be disbursed during SFY 2015 once environmental review is completed, construction permit issued, and binding loan commitment signed. For those projects with FNSI/CX clearance, the disbursement rate is estimated at 55% of the loan request amount.

APPENDIX B-1
PROCEDURES TO DETERMINE SECTION 212 PROJECT PRIORITY LIST

Project rankings were determined by the following procedures:

Cost eligibility of projects was determined as per 567 IAC 92.7(6)(455B). Applications were evaluated using the priority point system in 567 IAC 91.8(455B).

The final project priority list for a fiscal year's project pool is compiled in the following manner: subsequent segments of projects funded by CWSRF loan programs of previous years will be ranked at the top; projects ranked in the current year application group will then be added.

Projects on the project priority list will be given contingency status should the total amount of needs exceed the year's CWSRF staff resources capability and loan funding or if the projects have not met the fundable criteria described in 567 IAC 92.6(2)(455B) . Projects will be funded from the top down in the ranking order of the project priority list. Projects are ranked similarly in the contingency project list. The top project in the contingency list can be moved to the funding list when funds are available or it has met the fundable criteria. Funds can be made available due to a number of reasons including project bypasses, loan application withdrawal of other projects, reduction in loan amount requests, an increase in available funds, or progress in meeting program requirements.

APPENDIX B-2
CRITERIA TO DETERMINE PROJECT PRIORITY LIST

In April 2010 Iowa adopted revised rules for the Clean Water State Revolving Fund (CWSRF). 567 IAC 91 provides the criteria for scoring and ranking CWSRF projects. The new system uses an integrated approach which allows comparison of Section 212 POTW (publicly owned wastewater treatment works) projects as well as nonpoint source pollution control projects. The goal of the new system is gain the highest water quality benefits for the funding available.

Currently Iowa is able to fund all projects that are eligible, but the priority system will be available to use in the case that demand for CWSRF loans exceeds supply of funds.

Section 212 POTW Projects
The rating criteria consider the use classification of the receiving waters, water quality of the receiving waters, groundwater protection, project type, project purpose, and a tiebreaker; defined in 567 IAC 91.8 (455B). Priority ranking for the projects shall be based on the total points awarded for all the categories; the greater the total number of points, the higher the ranking. The ranking will be done at the time the IUP is prepared and will not be updated during the year. The tie breaker category will be used when necessary.

Nonpoint Source Set-Aside Programs
The rating criteria consider the use classification of the receiving waters, water quality of the receiving waters, groundwater protection, project type, project purpose, and a tiebreaker; defined in 567 IAC 91.8 (455B). Priority ranking for the projects is based on the total points awarded for all the categories; the greater the total number of points, the higher the ranking. The priority system for nonpoint source will not be implemented until 90 percent of a nonpoint source set-aside is allocated and no additional funds are available. If that occurs, ranking will be done at the time that a new project application is received.

DRINKING WATER STATE REVOLVING FUND
FY 2015 Intended Use Plan

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DRINKING WATER STATE REVOLVING FUND
FY 2015 Intended Use Plan

I. STATE FISCAL YEAR 2015 PLAN OF ACTION

The plan is based on anticipated use of new and revolved funds available in the DWSRF for construction of treatment plants or improvements to existing facilities, water storage facilities, wells, and source water protection efforts.

The SFY 2015 Plan of Action covers the following areas:

- DWSRF goals and objectives;
- Current and projected financial capacity of the DWSRF;
- Financial management strategies;
- Plan for the SFY 2015 project priority list;
- Plan for use of DWSRF set-aside funds; and
- Plan for use of administrative accounts.

DWSRF Goals and Objectives

The primary long-term goal of the Iowa DWSRF is to support the protection of public health through a perpetual program of financial assistance for the purposes of ensuring the provision of an adequate quantity of safe drinking water to consumers of public water supplies, protecting source water for drinking water systems, and ensuring the long-term viability of existing and proposed water systems.

The SFY 2014 short-term goals and objectives are as follows:

- Goal: Commit loan funds to as many recipients as possible in accordance with the state priority rating system, the IUP, staff resources, and available funding. *Objective: During SFY 2015, quarterly updates to the IUP will be prepared to add projects and update program financial information.*

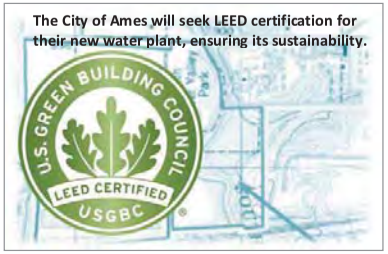
- Goal: Ensure that borrowers are able to provide safe drinking water at a reasonable cost for the foreseeable future. *Objectives: During SFY 2015, viability assessments will be completed by each applicant and reviewed by SRF staff prior to signing of the loan agreement. Systems determined nonviable or systems with EPA's Enforcement Targeting Tool (ETT) scores above 11 will be provided with an enforceable compliance schedule listing all actions that must be completed to return the system to viable status. Extended term financing will be offered to disadvantaged communities. SRF staff will*

coordinate efforts with other funders such as the Community Development Block Grant program. We will continue to educate and inform public water supplies, engineering consultants, and financial advisors on the financing savings available by using the DWSRF.

- Goal: Require applicants to engage a registered Municipal Advisor (MA). *Objective: During SFY 2015, all applicants submitting an Intended Use Plan application must demonstrate that they have hired an MA to assist with cash flows, rate setting, debt service coverage, and other financial aspects of their wastewater utility.*

- Goal: Implement the "Use of American Iron and Steel (AIS)" requirements enacted by Congress on January 17, 2014. *Objective: During SFY 2015, SRF staff will help applicants determine eligibility for the exemptions and waivers provided for in the Act and EPA guidance. SRF staff will provide information to those applicants required to comply on necessary documentation and inspection procedures.*

- Goal: Fund green projects to meet the requirements of the Green Project Reserve. *Objective: During SFY 2015, the Iowa SRF plans to fund green projects equivalent to at least 20% of the FFY 2011 capitalization grant. Iowa has already complied with the GPR requirements in the FFY 2010 cap grant. The GPR requirement for DWSRF was not included in subsequent cap grants.*



The City of Ames will seek LEED certification for their new water plant, ensuring its sustainability.

- Goal: Apply additional subsidization available in FFY 2011 - 2013 capitalization grants to disadvantaged community projects, public health projects, and green projects. Identify additional projects as needed when the FFY 2014 cap grant is available. *Objective: During SFY 2015 SRF staff plans to approve plans and specifications and execute loans or loan amendments with loan forgiveness for the amounts required in the FFY 2011-2013 cap grants.*

- Goal: Promote and identify sustainable practices in projects proposed for funding. *Objective: During SFY 2015 SRF staff will provide information on the EPA's Sustainability Policy to applicants and include sustainability features in project descriptions.*

Additional long-term goals include:

- Goal: Prioritize the provision of funds, to the extent practicable, to projects that address the most serious risk to human health and are necessary to ensure compliance with the national primary drinking water standards. *Objectives: Priority will be assigned to projects that address human health risks or compliance issues by the provision of points assigned during the DWSRF scoring process as outlined in 567 IAC Chapter 44. The EPA's Enforcement Targeting Tool (ETT) will be reviewed to determine whether additional assistance through the DWSRF program could be extended to systems with scores above 11 points related to drinking water quality through additional subsidization or other means.*

- Goal: Apply program requirements that are simple and understandable and do not add unnecessary burdens to applicants or recipients. *Objectives: During SFY 2015 SRF staff will continue to assist*

applicants with completing the federal cross-cutting requirements for environmental and historical review. Staff will not be responsible for Davis-Bacon compliance but will advise borrowers as needed. Borrowers will be responsible for compliance and may hire outside consultants to assist.

- Goal: Continue the option of extended financing terms for DWSRF infrastructure projects. *Objective: During SFY 2015 this option will be offered to applicants that meet the income guidelines set by the Community Development Block Grant program. Applicants seeking extended financing must complete a worksheet outlining the anticipated life of the project components, which can be averaged to determine the extended term.*

The City of Gladbrook will have 30 years to pay back a loan on a new water tower.

- Goal: Maintain mechanisms for funding the on-going administration of the program if federal funding is reduced or eliminated. *Objective: During SFY 2015 initiation and servicing fees will be collected on DWSRF loans for deposit to administrative accounts. SRF staff will develop short and long-term plans for administrative budgets.*

- Goal: Manage the DWSRF to maximize its use and impact through sound financial management. *Objective: During SFY 2015 SRF staff and financial advisors will continue to conduct financial analysis and develop innovative approaches to financial management.*

- Goal: Implement programs that effectively address water system needs and target appropriate audiences. *Objective: During SFY 2015 SRF staff will continue to educate users and potential users about the program offerings through presentations, displays, program materials, and the IowaSRF.com website.*

Current and Projected Financial Capacity of the DWSRF

Appendix A, the Estimated Sources and Uses table, shows that available funds are sufficient to fund current requests.

SRF staff has analyzed the future financial capacity of the DWSRF. Using relatively conservative assumptions, it is projected that the DWSRF could loan an average of $150 million per year over the next 10 years, or a total of $1.5 billion.

Financial Management Strategies

The source of funds for this IUP includes the FFY 2014 federal capitalization grant. A bond issue will be completed in SFY 2015 and state match bonds for the FFY 2014 cap grant will be issued at that time.

The previous years' cap grants and state match amounts are shown below. State match bonds are issued at the same time that leveraged bond issues are done for greater cost effectiveness. The cap grant amounts are not always known at that time, so there is typically an overmatch that can be rolled into the next fiscal year's state match.

FFY 2012	Cap Grant Amount	State Match Needed	Excess State Match
DWSRF state match from December 2011 bond issue		$1,801,012	
Excess state match		$1,418,537	
Total DWSRF state match available		**$3,219,549**	
FFY 2012 cap grant	$15,322,000	$3,064,400	$155,149

FFY 2013	Cap Grant Amount	State Match Needed	Excess State Match
DWSRF state match from July 2013 bond issue		$2,901,310	
Excess state match		$155,149	
Total DWSRF state match available		**$3,056,459**	
FFY 2013 cap grant	$14,375,000	$2,875,000	$181,459

FFY 2014	Cap Grant Amount	State Match Needed	Excess State Match
DWSRF state match needed		$2,464,341	
Excess state match		$181,459	
Total DWSRF state match available		**$181,459**	
FFY 2014 cap grant	$13,229,000	$2,645,800	

The Iowa SRF is a leveraged program, with the debt service reserve financed by bond proceeds. EPA Capitalization Grant funds are not used for the debt service reserve. The cash draw procedure used is the direct loan method. State Match is fully disbursed prior to drawing EPA Capitalization Grant funds. The EPA Capitalization Grant funds will be drawn at a 100% proportionality ratio.

SFY 2015 Project Priority List

The management of the DWSRF program, including development of a project priority list for financing assistance, was developed according to Part 567 of the Iowa Administrative Code (IAC), Chapter 44. This IUP indicates the intent to provide funds to projects ranked in priority order according to scoring criteria contained in Chapter 44 of the IAC.

In the event that projects identified for funding in the IUP do not attain readiness for a loan commitment by projected dates, these delayed projects may be bypassed. Other projects may be added to the project priority list to be funded based on the State's implementation rules for the DWSRF program (567 IAC 44). Applications that are in excess of available DWSRF assistance or that are unable to enter binding commitments within one year may be placed on Contingency status according to priority.

Projects will be funded as ranked on the project priority list. Adjustment to the list of fundable projects will be made, if necessary, to assure that at least 15% of the project funds are available to systems serving fewer than 10,000 persons as specified in Section 1452(a) (2) of the Act. Financing may be provided for up to 100% of project costs if the costs are eligible for funding based on engineering, environmental, and financial review and project readiness to proceed as described above.

The priority list has two major categories of projects: fundable and contingency. Fundable projects are defined as those are likely to be ready for a loan during the current fiscal year. Contingency projects are those that will not be ready for a loan during the current fiscal year.

Due to the project workload and for planning purposes, the DWSRF staff will evaluate projects that have been on the IUP list for more than three years. A notification will be sent to the applicants that their project may be

dropped if there is no progress in the six months following the notice. If a project is dropped, the applicant may reapply when the project is ready to move ahead.

For program planning purposes, the fundable projects are further identified as "R – ready for loan" (indicating that the construction permit and environmental review have been completed), and "P – in planning."

The following categories of projects will be included for funding during SFY 2015:

Ottumwa Water & Hydro plans to use SRF to install a new disinfection system.

Unfunded Prior Years' Projects. All projects from prior years that have not entered into a binding commitment are included in this IUP.

Segments of Previously Funded Projects. State rules provide that subsequent segments of a project which has previously received funding priority or assistance be placed on the project priority list with the original project score.

New Projects. New applications for assistance during SFY 2015 will be added to the project priority list. Applications will be accepted on a continuous basis and quarterly updates completed as needed.

Supplemental Financing. Supplemental financing for projects listed in previously approved IUPs are added to the IUP as they are requested unless the additional funds will be used for improvements that would significantly change the scope of the project. Additional environmental review may be required. Supplemental loans will not be provided for changes that would lower the original score of the project to a point where the application is no longer competitive or is ineligible for funding.

Contingency Projects. Projects on contingency status have indicated they do not expect to enter into binding commitments during SFY 2015. These projects may be moved to fundable status if their schedules indicate they will require funding during SFY 2015.

Planning and Design Loans. Requests for planning and design loans are listed on the project priority list but have not been assigned priority points.

Source Water Protection Loans. Applications from eligible public water supplies with approved SWP plans will be added when the proposed project is a component of the SWP plan.

Capitalization Grant Requirements. The FFY 2010 - 2014 capitalization grants include requirements for certain percentages of the funds to be allocated for green projects and/or for additional subsidization.

	2010	2011	2012	2013	2014	TOTAL
DW Cap Grants	$23,169,000	$16,077,000	$15,322,000	$14,375,000	$13,229,000	$ 82,172,000
DW GPR	$ 4,633,000	$ 3,164,200	$ -			$ 7,797,200
DW Add Subs	$ 6,950,700	$ 4,746,300	$ 3,064,400	$ 2,875,000	$ 2,645,800	$ 20,282,200

Minimum						
DW Add Subs Maximum	$23,200,000	$15,821,000	$ 4,596,600	$ 4,312,500	$ 3,968,700	$ 51,898,800

The following outlines the amounts and the projects that have been or will be counted for each cap grant. Projects are labeled as D (Disadvantaged), P (Public Health), or G (Green Project Reserve). The projects for which additional subsidization has been committed but which have not signed loan agreements as of March 2014 are shown in bold.

Project	D, P, or G	Current Request	Loan Amount	Amount Green	Amount Add Subs	Grant Year Reported
New Hartford	D		$ 81,000		$ 16,200	2010
Charlotte	PH		$ 93,000		$ 46,500	2010
Colfax	G		$ 510,000	$ 510,000	$ 153,000	2010
Durant	G		$ 182,000	$ 182,000	$ 36,400	2010
Keokuk	D		$ 1,600,000		$ 480,000	2010
Lidderdale	D		$ 400,000		$ 240,000	2010
Lyon-Sioux RWS	G		$ 455,000	$ 455,000	$ 90,900	2010
Maquoketa	G		$ 492,000	$ 492,000	$ 98,400	2010
Ottumwa	D		$ 1,400,000		$ 560,000	2010
Ottumwa	D		$ 1,666,000		$ 666,400	2010
Rathbun RWA	D		$ 5,380,000		$ 1,614,000	2010
Rolfe	D		$ 1,122,000		$ 561,000	2010
Union	D		$ 658,000		$ 197,400	2010
Wall Lake	G		$ 132,000	$ 132,000	$ 26,400	2010
Lidderdale	D		$ 1,301,000		$ 780,600	2010
Shenandoah	G		$ 14,057,000	$ 5,228,000	$ 1,050,000	2010
Humboldt	G		$ 6,814,000	$ 1,800,000	$ 360,000	2010
Ottumwa	G		$ 1,250,000	$ 1,250,000	$ 250,000	2011
College Springs	PH		$ 110,000		$ 37,661	2011
Timber Ridge Water Utility Corporation	PH		$ 225,000		$ 112,500	2011
Ames (Status: preparing to bid)	***G***	***$ 51,315,000***		***$ 29,983,000***	***$ 9,000,000***	***2011***
Churdan (Status: in planning)	***PH***	***$ 215,000***			***$ 107,500***	***2012***
Frankville (Status: in planning)	***PH***	***$ 762,000***			***$ 381,000***	***2012***
Hills (Status: out to bid)	***PH***	***$ 3,832,000***			***$ 1,916,000***	***2012***
Kelley (Status: in planning)	***D***	***$ 1,825,000***			***$ 548,000***	***2013***
LeMars (Status: project under construction)	***G***	***$ 985,000***		***$ 985,000***	***$ 197,000***	***2013***
Ralston (Status: in planning)	***D***	***$ 344,000***			***$ 138,000***	***2013***
Shenandoah	***G***	***$ 81,000***		***$ 81,000***	***$ 16,000***	***2013***
Story City	***G***	***$ 207,000***		***$ 207,000***	***$ 42,000***	***2013***
TOTAL		**$ 59,566,000**	**$ 37,928,000**	**$ 41,305,000**	**$ 19,722,861**	

II. INFORMATION ON THE DWSRF ACTIVITIES TO BE SUPPORTED

Allocation of Funds

Allocation of funds to eligible projects is based on a three-step process:

1. The amount of financial assistance needed for each application is estimated;
2. The sources and spending limits for all DWSRF funds are identified; and
3. The DWSRF funds are allocated among the projects, consistent with the financial assistance needed.

Information pertinent to each DWSRF project is contained in the attached Project Priority List.

Sources and Uses of Available DWSRF Funds

Appendix A to the Intended Use Plan illustrates potential sources and uses of funds in the DWSRF for SFY 2015. As shown, all pending loan requests and program administration needs can be funded. Projects will draw on their funding at different intervals based on their construction cycles. These differences are used to estimate cash needs throughout the year. Appendix A will be updated quarterly as needed to provide an ongoing view of the financial plan for meeting loan requests.

The Iowa DWSRF program uses its equity fund to originate loans. When the number of loans that have been made creates a need for additional funds, IFA issues bonds, backed by those DWSRF loans, and uses the bond proceeds to replenish the equity fund.

DWSRF Loan Policies

Project Scope. The scope of the project must be outlined on the Intended Use Plan application and in the preliminary engineering report. Changes to the scope are allowed prior to loan closing. Significant changes in scope may cause delays if additional work is required by the project manager or environmental review specialist. Once a loan is signed, only minor changes to the scope will be allowed and only if they do not require additional technical or environmental review.

Loan Interest Rates. The interest rate for DWSRF construction loans are shown in the table below:

Loan Term	Applicant Type	Interest Rate	Servicing Fee	Total	Additional Information
Standard (up to 20 years)	All	1.75%	.25%	2.00%	
Extended (21 to 30 years based on useful life)	Disadvantaged	1.75%	.25%	2.00%	Only communities determined to be disadvantaged are eligible for extended financing terms in the DWSRF program. Please see below,

					"Extended Financing and Disadvantaged Status," for an explanation.

Interest rates for DWSRF planning and design loans will be 0% for up to three years. Interest rates for source water protection loans, which come out of the Other Authorized Uses set-aside, will be 0% for up to 20 years.

Loan Fees. A 0.5% origination fee is charged on the full loan amount for new DWSRF construction loans and source water protection loans, with a maximum amount of $100,000. No origination fees will be charged on planning and design loans. A .25% servicing fee will be charged on construction loans and source water protection loans. Payment of the loan servicing fee is semi-annual with interest payments for all new SRF loans. Loan servicing fees are only charged on the principal amount disbursed during construction (not the entire original loan amount).

Maximum Financing. There is no maximum financing amount.

Project Readiness. Applicants cannot be offered assistance until they meet program requirements.

Funding Limitations. All program requests for disbursements from DWSRF projects can be met. These estimates are based on the projections that, for projects that have completed program requirements and are ready for funding, only 70% of the loan amount will be disbursed this fiscal year. For projects that are currently in the planning phase but may be ready for funding during SFY 2015, it is projected that only 50% of total funds will be disbursed to the project this fiscal year.

Extended Financing and Disadvantaged Status. The Safe Drinking Water Act Amendments of 1996 allow states to provide an extended term for a loan to a disadvantaged community as long as the extended term does not terminate more than 30 years after project completion and the loan term does not exceed the expected design life of the project. The Act defines a disadvantaged community as the service area of a public water system that meets affordability criteria established after public review and comment.

Community public water systems serving populations that contain a majority (51 percent) of Low to Moderate Income (LMI) persons will be considered disadvantaged for the purpose of determining an extended loan term in the DWSRF loan program. This criterion does not apply to any other DWSRF assistance such as additional subsidization. Low to moderate income is defined as 80 percent of the median household income in the county or state (whichever is higher) using the most recent federal census or income survey data. Privately owned community public water systems will be considered eligible for disadvantaged community status if an income survey indicates that the service area meets the LMI criteria. Rural water systems will be considered eligible for disadvantaged community status if an income survey indicates that the area benefiting from the improvements meets the LMI criteria. Income surveys must be done according to the protocol specified by the Community Development Block Grant program.

Extended term loans to disadvantaged communities are limited to public water supply infrastructure improvements. Projects eligible for funding from set-asides, such as source water protection projects, are not eligible in accordance with federal program requirements.

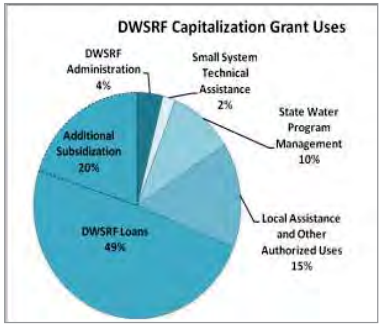
Only those portions of a project that have a design life or life cycle of at least 30 years are eligible for repayment schedules exceeding 20 years. The department will use the table of estimated useful lives from EPA's publication 816-R-03-016 to determine the length of the loan for eligible expenses. The consulting engineer for

the project will be required to separate and itemize costs so that a weighted maturity may be calculated for loan repayment. The list of itemized costs and expected useful lives will be required prior to signing of the loan agreement.

If a project is not able to enter into a binding commitment in a timely manner, it may be replaced with the next disadvantaged community project that is ready to proceed.

Intended Use of Set-Asides

States are allowed to take or reserve set-aside amounts from each federal capitalization grant for a number of activities that enhance the technical, financial, and managerial capacity of public water systems and protect sources of drinking water. The use of the set-asides as well as the loan program is intended to carry out Iowa's goal of ensuring that the drinking water received by 92% of the population served by community water systems meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.



The amounts are subject to approval by EPA of program workplans. The DNR is following the FY 2014 workplan. Iowa plans to take or reserve the allowed amount in each set-aside as shown in the chart.

DNR has two options for addressing the amounts available each year in set-asides. Set-aside funds may be reserved for future use (except for the Local Assistance and Other Authorized Uses set-aside), in which case they would be deducted from a future capitalization grant when they are ready to be taken. Funds that are taken from an available capitalization grant must be applied to planned work efforts approved by EPA.

In recent years, DNR has been using the set-asides and drawing upon reserved funds as needed to meet the needs for programs and efforts required by EPA that are critical for ensuring public health. Once the reserved amounts are expended, the amounts available for each set-aside will be limited to the percentage allowed out of each capitalization grant.

DWSRF Program Administration Set-Aside. Iowa intends to use this set-aside including loan administrative fees to pay the costs of administering the State Revolving Fund loan program. Among the uses for the set-aside are:

- Portfolio management, debt issuance, and financial, management, and legal consulting fees;
- Loan underwriting;
- Project review and prioritization;
- Project management;
- Environmental review services;
- Technical assistance to borrowers;
- Database development and implementation; and
- Program marketing and coordination.

Unused commitments are reserved for use in future years as necessary.

Small System Technical Assistance Set-Aside. Iowa intends to use DWSRF funds equivalent to 2% of the federal capitalization grant funds to provide technical assistance to public water supplies (PWSs) serving populations of less than 10,000.

Funds from this set-aside will be used this year to provide these PWSs monitoring schedules via operation permits, quarterly monitoring reminder notices, and technical assistance.

Unused commitments are reserved for use in future years for DNR staff and other purposes as necessary.

State Program Support Set-Aside. The primary uses of this set-aside are to assist with the administration of the Public Water Supply Supervision program, to review engineering documents for non-DWSRF construction projects, to determine viability for new systems, and to provide operating permits for public water supplies serving at least 10,000 persons.

Other uses include:

- Updating the SDWIS database including support systems and provide compliance determinations and information technology database support;
- Adopting final federal rules and revisions to the Iowa Administrative Code

Fifty percent of the budget amount will be funded from the capitalization grant and the remaining 50% will be funded from State sources. Unused commitments are reserved for use in future years for DNR staff and other purposes as needed.

Other Authorized Activities Set-Aside. The two primary uses of this set-aside are capacity development and source water protection (SWP).

Funds are budgeted for efforts related to developing technical, managerial, and financial capacity for Iowa's public water supplies, including:

- Completion of sanitary surveys with viability assessments;
- Provision of technical assistance related to capacity development through the area wide optimization program (AWOP);
- Contracts with five counties to complete sanitary surveys;
- Provision of performance based training for the AWOP program; and
- Contractor assistance with capacity development (viability assessment).

A groundwater site investigation

The SWP activities include the following:

- Coordination and administration of the Source Water Protection Targeted Community Water System program with a focus on system with elevated groundwater nitrate levels;
- Contracts for services to develop SWP plans and to finalize implementation of Best Management Practices (BMPs) identified in SWP action plans;

- Water quality monitoring to evaluate impacts of BMPs;
- Groundwater site investigations;
- Development of data for Phase 1 SWP assessments;
- Technical assistance for well siting; and
- Completion of a study on viruses and other contaminants in groundwater.

Plan for Use of Administrative Accounts
There are three distinct funding sources for DWSRF administrative expenses:

- The DWSRF administrative set-aside. Four percent of the cumulative amount of federal capitalization grants received may be used for program administration as discussed in the set-aside section above.

- Loan initiation fees. A 0.5% loan origination fee is charged on new DWSRF loans. Under EPA rules, because Iowa's origination fees are financed through the loans, the proceeds are considered program income. Program income can only be used for the purposes of administering the DWSRF program or for making new loans.

- Loan servicing fees. A fee of 0.25% on principal is charged on DWSRF loans. Under EPA rules, only servicing fees charged on loans made above and beyond the amount of the capitalization grant and fees collected after the capitalization grant under which the loan was made has been closed are considered non-program income. Non-program income can be used to administer the program or for other safe drinking water purposes.

Program Income. As of July 2013, there was approximately $6.4 million in the fee account encompassing program income. A portion of these funds will be used in SFY 2015 for program administration, and the remainder will be reserved for future administrative expenses.

Non-Program Income. As of July 2013, there was $4.3 million available in funds considered non-program income. DWSRF non-program income may be used in SFY 2015 to provide part of the required state match for the State Program Management set-aside.

Plan for Efficient and Timely Use of DWSRF Funds
In recent years, the processes of the DWSRF have been streamlined, and the marketing and education enhanced. These improvements have resulted in more efficient and timely use of the DWSRF and full utilization of available funds. In particular, Iowa applies for and draws federal capitalization grants as expeditiously as possible.

Rather than doing one annual funding solicitation, with a discrete set of projects identified for funding that year, the Iowa SRF does quarterly updates to its Intended Use Plan. This creates a continuous pipeline of projects at different stages of readiness. Communities determine when they need their funding; the program does not set deadlines on loan execution.

With a return of $2.50 for every dollar of federal investment, Iowa's DWSRF is an efficient and effective delivery mechanism for water infrastructure funding.

DWSRF set-asides are typically fully utilized within a two-year planning and budgeting period. Iowa draws grant funds on a first-in, first-out basis in order to close out the capitalization grants. Due to increased water program

budget needs, Iowa is spending reserved set-aside capacity at a faster rate than in the early years of the DWSRF program.

III. ASSURANCES AND SPECIFIC PROPOSALS

Iowa will provide the necessary assurances and certifications according to the Operating Agreement between the State of Iowa and the U.S. EPA. Iowa's Operating Agreement was amended in April 2007.

IV. CRITERIA AND METHOD FOR DISTRIBUTION OF FUNDS

The following approach was used to develop Iowa's proposed distribution of DWSRF funds: (1) analysis of the priority of communities applying and financial assistance needed; (2) identification of the sources and spending limits of available funds; (3) allocation of funds among projects; (4) development of a payment schedule which will provide for making timely binding commitments to the projects selected for DWSRF assistance; and (5) development of a disbursement schedule to pay the project costs as incurred.

Priority of Communities and Financial Assistance Needed
Iowa law provides only for loan assistance. Additional subsidization required by the FFY 2010-2013 capitalization grants will be through forgivable loans. The state's DWSRF rules identify the priority rating system used to establish priorities for financial assistance.

A new water tower and replacement wells will allow the City of Charlotte to serve safe drinking water.

Projects are considered eligible for financial assistance for all planning and project costs providing the project is on the project list of an approved IUP.

Allocation of Funds among Projects
All projects listed in the Project Priority List are eligible for assistance and may be funded from the DWSRF subject to available funds.

All projects scheduled for funding with Iowa's DWSRF will be reviewed for consistency with the Safe Drinking Water Act, as amended. Should a project fail to meet this review criterion, it may be bypassed or deleted from the funding list. Contingency projects may be considered for assistance as bypass projects according to state rules without formal amendment of this IUP. Projects may be added to the Project Priority List in priority order as applications are received.

V. METHOD OF AMENDMENT OF THE INTENDED USE PLAN

The State will follow this IUP in administering DWSRF funds in FY 2015. Federal and state law requires, and Iowa welcomes, opportunity for public participation in the development of the IUP. Any revisions of the goals, policies and method of distribution of funds must be addressed by a revision of the IUP, including public participation. Minor adjustments in funding schedules, loan amounts, and use of bypass provisions including funding of projects on the contingency list are allowed by the procedures of this IUP and state rules for administration of the DWSRF without public notification. Adjustments to the Project Priority List to utilize actual funds available

to the DWSRF for FY 2014 will be considered minor and only affected applicants will be notified. Public notice of amendments will be made if municipalities are added to or removed from the Project Priority List.

VI. PUBLIC REVIEW AND COMMENT

A public meeting to allow input to Iowa's SFY 2015 IUP and Project Priority List was held May 8, 2014, 10:00 a.m., at the Wallace State Office Building, Conference Room 5E, 502 E. 9th Street, Des Moines. This meeting was announced in a notice provided to stakeholder organizations representing city officials, consulting engineers, county governments, councils of government, area planning agencies, US EPA Region VII and other groups which might have an interest. There were no attendees. The public comment period was pen until May 15, 2014. The U.S. EPA, Region 7 requested that a table showing state match for the recent capitalization grants be included in the IUPs. The table has been added.

VII. PROJECT PRIORITY LIST

The DWSRF Project Priority List is included in a separate, sortable Excel file.

APPENDIX A

Iowa DWSRF State Fiscal Year 2015, 1Q
Estimated Funding Sources and Funding Uses
As of 4/11/14

Funding Sources for Loans		
Funds Available in Equity Fund and Program Accounts	$91,009,000	*
FFY 2013 Capitalization Grant	$1,338,000	*
State Match for FFY 2013 Capitalization Grant (Fully Disbursed)	$0	
FFY 2014 Capitalization Grant	$9,260,000	
State Match for FFY 2014 Capitalization Grant	$2,646,000	
Issuance of Leveraged Bonds in FY14 (Next Bond Issue Expected FY15)	$8,986,000	
Equity Fund and Program Interest Earnings	$200,000	
Loan Repayments	$30,000,000	
Funds Released from Indentures to Equity Fund (available for loans)	$7,938,000	
Total Funding Sources for Loans	**$151,377,000**	

Funding Uses for Loans	
Undisbursed Amounts Committed to Existing Loans (80% disbursement rate)	$27,465,000
Project Requests (FNSI/CX issued; 70% disbursement rate)**	$57,629,000
Project Requests (FNSI/CX not issued; 50% disbursement rate)**	$41,049,000
Planning & Design Requests (50% disbursement rate)	$1,122,000
Principal Payments on Outstanding Bonds	$13,365,000
Interest Payments on Outstanding Bonds	$10,747,000
Total Funding Uses for Loans	**$151,377,000**

* Funds Available for disbursements as of 4/11/2014

** Loan disbursement rates are estimated based on previous experience with project pace. For projects that currently have not had a Finding of No Significant Impact or Categorical Exclusion issued, it is expected that up to 50% of the total project amounts may be disbursed during SFY 2015 once environmental review is completed, construction permit issued, and binding loan commitment signed. For those projects with FNSI/CX clearance, the disbursement rate is estimated at 70% of the loan request amount.

Funding Sources for Set Asides (Includes FFY 2013 & previous Cap Grants)	
Available Balance under Existing Capitalization Grants for set asides:	
Administration	$0
Small Systems Technical Assistance	$636,000
State Program	$2,321,000
Other Authorized Activities	$4,628,000
Total Funding Sources for Set-Asides	**$7,585,000**

Funding Uses for Set Asides	
Administration	$0
Small Systems Technical Assistance	$636,000
State Program	$2,321,000
Other Authorized Activities	$4,628,000
Total Uses for Set Asides	**$7,585,000**

APPENDIX B
PROCEDURES TO DETERMINE PROJECT PRIORITY LIST

Project rankings were determined by the following procedures:

- Eligibility of applications were determined by needs criteria identified in IAC 567—44.7(8). In general, most water source, treatment and distribution system improvements are considered eligible.

- Project applications received during the FY 2015 application period were considered for funding in FY 2014; if not funded by the end of FY 2015, these projects will be moved to the FY 2016 project priority list.

- The priority ranking is a total score developed using the scoring criteria listed in IAC 567—44.7(8). Points may be gained in each of five categories: Water Quality and Human Health Risk-Related Criteria (60 point maximum), Infrastructure and Engineering-Related Improvement Criteria (35 point maximum), Affordability Criteria (10 point maximum), Special Category Improvements (15 point maximum), and IDNR Adjustment Factor for Population (10 points). The combined score provides a numerical measure to rank each project within its pool. A project with a larger number receives higher priority.

- The final project priority list for a fiscal year's project pool is compiled in the following manner: Subsequent segments of projects funded by DWSRF loan programs of previous years will retain their original score and be added to the list of the current year's applications.

- Loan-eligible projects submitted will be placed on the IUP each calendar quarter. If the project is anticipated to proceed during FY 2015, the project will be added to the project priority list and the list will be made available for public comment at the end of each calendar quarter in which one or more projects are added to the list.

- Projects on the project priority list will be moved to contingency status if the total amount of needs exceeds the year's DWSRF staff resources capability and loan funding or if it is known that the project will be unable to be funded during FY 2015. Projects will be funded from the top down in the ranking order of the project priority list with consideration given to readiness to proceed. Projects are ranked similarly in the contingency project list. Projects on contingency status can be moved to the funding list when funds are available or when the project is ready to proceed. Funds can be made available due to a number of reasons including project bypasses, loan application withdrawal of other projects, reduction in loan amount requests, or an increase in available funds.

STATE REVOLVING FUND
FY 2015
Intended Use Plans

Patti Cale-Finnegan, Iowa Department of Natural Resources
Lori Beary, Iowa Finance Authority

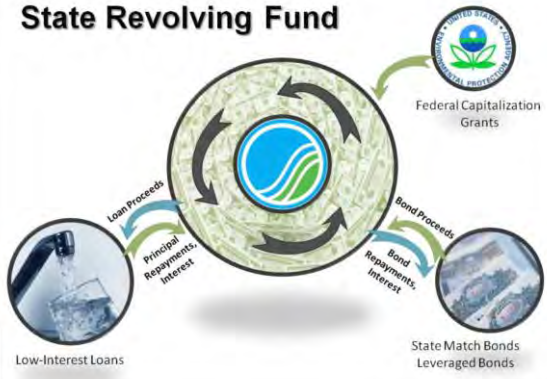
Background

The SRF is Iowa's primary source of financing for drinking water and wastewater infrastructure, storm water quality, and nonpoint source protection

Background

SRF programs authorized by Clean Water Act and Safe Drinking Water Act and administered by U.S. Environmental Protection Agency

State Revolving Fund



Background

Program frameworks and eligibility set by federal law, but each state can set its own priorities for use of funds

Background

- Iowa Code
  - 455B.291-299 (DNR)
  - 16.131-133A (IFA)
- Iowa Administrative Code
  - 567 Chapters 40 and 44 – DWSRF (adopted by EPC)
  - 567 Chapters 90-93 – CWSRF (adopted by EPC)
  - 265 Chapter 16 – SRF (adopted by Iowa Finance Authority Board)
- *"The program shall be a joint and cooperative undertaking of the department and the authority."*

Background

- Iowa Department of Natural Resources
  - Program planning and prioritization
  - Project planning and permitting
  - Environmental review
  - Federal compliance
- Iowa Finance Authority
  - Financial management
  - Bond issues
  - Loan processing
  - Loan disbursements

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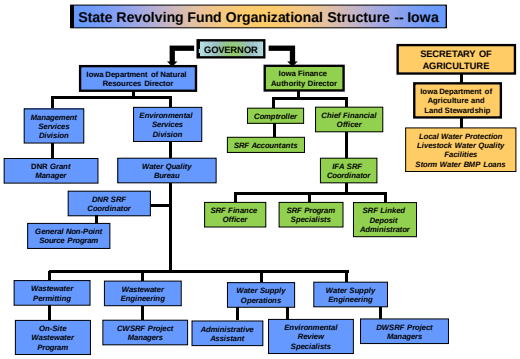
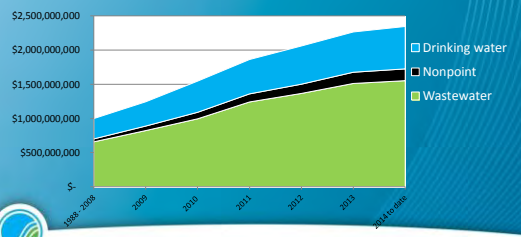


Growth of SRF



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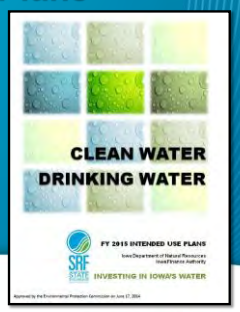
Intended Use Plans

- EPA requirement
- Outlines funding available and proposed uses
- Sets goals and objectives, policies and procedures
- Public review and comment
- Approval by EPC



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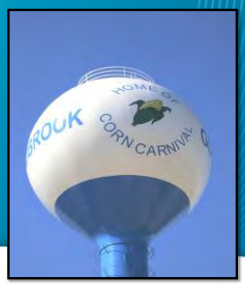
Drinking Water SRF

- Loans for:
  - Improvements to public water supply systems
  - Consolidations and connections
  - Source water protection
- DWSRF set-asides fund technical assistance, capacity development, state drinking water program, SWP



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Drinking Water SRF

Applicant	Project	Request
City of Oto	Construction of new water storage tank	$61,000
Muscatine Power & Water	Planning and design loan	$216,000
City of Tripoli	Replacement of 60-year-old water treatment plant	$1,200,000
Mahaska Rural Water	Upgrade wells and water treatment system	$3,609,000
City of Pella	Construction of new Jordan well	$14,645,000
City of Ames	Construction of new 15 million gallon/day water treatment plant	$51,315,000

SRF STATE

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Clean Water SRF

- Loans for:
  - Publicly owned wastewater treatment facilities
  - Sewer system rehabilitation
  - New systems for unsewered communities
  - Stormwater management for water quality
  - Nonpoint source pollution control

SRF STATE

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Clean Water SRF

Applicant	Project	Request
City of Spragueville	Planning and design loan	$37,000
City of Mondamin	Sewer rehabilitation	$83,000
City of Geneva	Collection system and mound system for unsewered community	$519,000
City of Mount Pleasant	Interceptor sewer replacement	$1,600,000
City of Hampton	New wastewater treatment plant	$7,400,000
City of Dubuque	Stream restoration and urban stormwater management for water quality	$28,823,000

SRF STATE

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Loan Types

- Planning and design
  - 0% financing for up to 3 years
- Water and wastewater construction
  - 1.75% interest rate
  - Terms up to 30 years for some projects
- Source water protection
  - 0% interest for 20 years

SRF STATE

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Environmental Review

- Environmental review specialists assist with ER process
- Brick sewers, historic water towers, pioneer cemeteries, Native American sites, Indiana bats, Topeka Shiner, flood plains, wetlands, etc.

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Environmental Review

- Master contracts with archeology and/or architectural history firms reduce delays and problems
- SRF pays for needed surveys out of fees paid by applicants

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Nonpoint Source Loans

- Low-cost financing for nonpoint source projects
- Project approval by environmental agency
- Financing approval by participating lender
- Interest rate max 3%
- Can be used with cost-share, EQIP, other grants

- On-Site Wastewater Systems
  - Helps homeowners replace inadequate septic systems
  - Contact county sanitarian
  - All 99 counties participate

Partnership with IDALS

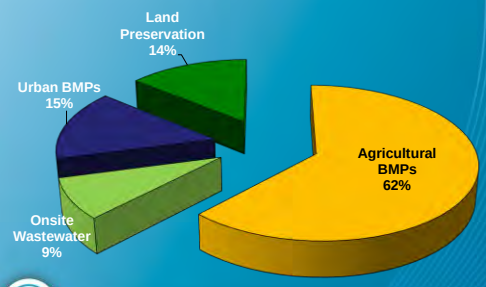
- Iowa Department of Agriculture and Land Stewardship agreement
- Soil and Water Conservation Districts
- Natural Resources Conservation Service

- Ag Best Practices
  - Soil erosion
  - Manure management
  - Non-CAFO size livestock operations
  - IDALS administers through contract with DNR
  - Apply through Soil and Water Conservation Districts
  - NRCS technical help

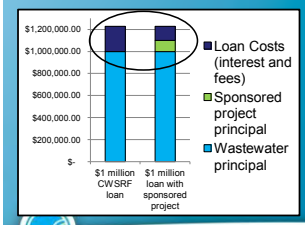
- Green Infrastructure
  - Water quality benefit in lowering volume and treating stormwater
  - Use Iowa Stormwater Management Manual standards
  - Review by SWCDs and IDALS Urban Conservationists
  - Both public and private borrowers

- Land Quality
  - Brownfield cleanup
  - Landfill closure
  - Apply to DNR
  - Review by DNR Contaminated Sites staff or Solid Waste engineers

- **Land Preservation / Wetland Restoration**
  - Partnerships between Iowa Natural Heritage Foundation, DNR, County Conservation Boards, etc.
  - INHF gets loan from local bank which uses SRF funds
  - INHF holds properties for 3-5 years while government agency assembles funding
  - Land turned over to public ownership



Sponsored Projects



- Allows wastewater utilities to address nonpoint source problems
- $25 million set-aside for first two years
- Applications due twice each year
- Recommendations included in this IUP

Loan Forgiveness

- Started with federal stimulus
- Attached to annual capitalization grants
- Must provide certain percentage of cap grant amount as "additional subsidization"
- Have committed loan forgiveness to help disadvantaged communities, promote solutions to public health problems, and incentivize green projects

Program Income

Fee	Description	Uses
Origination fee	0.5% of loan amount added to the loan amount	"Program income" – can only be used to administer the SRF programs. This includes water supply and wastewater engineering section project managers, environmental review, nonpoint source program administrators, financial officers, loan coordinators, program managers, and financial and legal advisors.
Servicing fee (first 1-3 years of loan)	0.25% annual fee on outstanding principal	

Non-Program Income

Fee	Description	Uses
Servicing fee (final 19 – 30 years of loan)	0.25% annual fee on outstanding principal	CWSRF: • DNR wastewater field staff • DNR Water Quality Bureau staff DWSRF: • State match for Public Water Program set-aside

Coming up in FY 2015

- Taking applications year-round
- Quarterly updates of the IUPs in September, December, March
- New "municipal advisor" requirement
- Federally mandated Use of American Iron and Steel
- Anticipated disbursements:
  - CWSRF: $276 million
  - DWSRF: $151 million

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Questions?

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Project Name	NPDES No.	Project Number	CWSRF No.	Project Description	IUP Yr	Needs Category	Priority Points	Quarter	Project Status	Current Requests	Loan Forgiveness	Loan Signed	Original Request	Loan Amount
Afton	8803001	S2014-0265	1920707 01	Sanitary Sewer Rehabiltation and Lagoon Biosolids Removal	2015	IIIA	134	1	P	$ 206,025				
Ames	8503001	S2014-0223	1920713 01	Lift Station Improvements	2015	IIIB	160	1	P	$ 1,155,440				
Burlington	2909001	S2013-0301	1920708 01	Construction of a new plastic sanitary main, set within the existing box.	2015	V	189	1	P	$ 1,001,920				
Fairfield	5131001	S2014-0008	1920704 01	Inflow & Infilitration reduction by replacing existing sewers	2015	IIIA	167	1	P	$ 8,286,225				
Fairfield	5131001	S2013-0368	1920705 01	Construction of a new influent and stormwater pumping building, headworks bldg, third oxidation ditch, UV disinfection system and aerobic digester.	2015	II	252	1	P	$ 14,856,848				
Fairfield	5131001	S2013-0368	1920706 01	Construction of a forcemain	2015	IVB	157	1	P	$ 3,817,548				
Keokuk	5640001	S2012-0406	1920709 01	Update the water pollution control plant	2015	V	197	1	P	$ 6,009,500				
Knoxville	6342001	S2014-0209	1920702 01	Wastewater Collection System Rehabilitatin Phase 1	2015	IIIA	169	1	P	$ 2,467,500				
Letts	5847001	S2014-0208	1920711 01	Sanitary Sewer I/I Rehabilitation	2015	IIIA	170	1	P	$ 581,100				
Milo			PD-CW-15-04	Treatment	2015	I	P&D	1	R	$ 250,000				
North Liberty	5252001	S2012-0245	1920703 01	Phase II Wastewater Treatment Plant	2015	II	190	1	P	$ 14,264,000				
North Liberty			PD-CW-15-03	Phase 2 Expansion of the watewaer treatment plant	2015	II	P&D	1	R	$ 1,450,000				
Northwood			PD-CW-15-05	Treatment Facility	2015	II	P&D	1	R	$ 480,000				
Roland	8570001	S2014-0203	1920710 01	Cottonwood Street Sanitary Swere	2015	IIIA	160	1	P	$ 1,788,900				
Sumner	0970001	S2012-0127	1920712 01	Disinfection and Sludge Storage	2015	II	209	1	P	$ 402,000				
Winterset	6171001	S2012-0027	1920715 01	Replace trickling filter arms, move controls for North Lift Station and construct dump station	2015	I	137	1	P	$ 1,444,868				
Arlington	3307001	S2014-0186	1920694 01	Sanitary sewer rehabiltation	2014	IIIA	117	4	P	$ 349,961				
Blakesburg	6827001	S2014-0172	1920695 01	Sanitary sewer rehabiltation	2014	IIIA	132	4	P	$ 383,000				
Chariton	5903001	2014-0106	1920697 01	Increase capacity of 12th St Lift Station and replace NW Lift Station with new structures and equipment.	2014	IVB	135	4	P	$ 350,000				
Chariton			PD-CW-14-36	Increase capacity of 12th St Lift Station and replace NW Lift Station with new structures and equipment.	2014	IVB	P&D	4	R	$ 137,900				
Fairbank	1025001	S2012-0184	1920700 01	Wastewater System Improvements	2014	II	234	4	P	$ 3,114,500				
Kalona	9233001	S2014-0078	1920687 01	CIPP & Force Main Install	2014	IIIA	145	4	P	$ 1,124,000				
Keosauqua	8938001	S2013-0110	1920693 01	PER Wastewater Improvements	2014	IIIA	145	4	P	$ 546,000				

Luther	0844001	S2007-0027	1920701 01	Provide sanitary sewer facilities to unsewered community.	2014	XII	285	4	P	$ 1,254,000				
Maxwell	8557001	S2014-0169	1920698 01	Sanitary sewer rehabiltation	2014	IIIA	130	4	P	$ 271,800				
Mitchellville	7751001	S2014-0159	1920696 01	Sanitary sewer rehabiltation	2014	IIIA	177	4	P	$ 307,340				
Rockwell City	1376001	S2014-0177	1920699 01	Replacement of broken sewer mains and replacement and repair of manholes	2014	IIIA	137	4	P	$ 1,623,123				
Titonka	5588001	S2014-0147	1920692 01	Sanitary Sewer Collection Systems Improvements	2014	IIIA	132	4	P	$ 662,000				
Titonka			PD-CW-14-38	Sanitary Sewer Collection Systems Improvements	2014	IIIA	P&D	4	R	$ 72,000				
Ames	8503001	S2013-0326	1920686 01	WPCF Biosolids Storage Tank	2014	II	180	3	P	$ 1,885,400				
Coralville			PD-CW-14-31	Replace manholes, reconstruct sewer lines at Oakdale trunk sewer and replace lift station and form main for Muddy Creek	2014	IIIB	P&D	3	R	$ 270,263				
Dyersville	3130001	S2013-0345	1920689 01	WWTF Expansion Project	2014	II	172	3	C	$ 3,030,000				
Dyersville	3130001	S2013-0342	1920690 01	SE Lift Station & Collection System Improvements	2014	IVB	127	3	C	$ 1,476,620				
Epworth	3133001	S2011-0155	1920683 01	Conversion of lagoon to sludge wastewater treatment facility. Construction of new mail lift station.	2014	II	240	3	R	$ 5,296,000				
Farley	3135001	S2013-0378	1920691 01	WWTF Disinfection	2014	II	199	3	P	$ 241,390				
Garnavillo	2234001	S2012-0200	1920684 01	Improvements to collection system	2014	II	199	3	P	$ 4,469,250				
Miles	4953001	S2013-0064	1920688 01	Construction of controlled discharge lagoon	2014	I	227	3	P	$ 897,890				
Spragueville	4982001	S2013-0202	1920685 01	Septic tank/sand mound treatment system.	2014	XII	199	3	P	$ 316,544				
Spragueville			PD-CW-14-30	Septic tank/sand mound treatment system.	2014	XII	P&D	3	R	$ 37,000				
Ames			PD-CW-14-15	Sewer rehabilitation	2014	IIIB	P&D	2	R	$ 375,000				
Dyersville			PD-CW-14-18	New Lift Station	2014	IIIB	P&D	2	R	$ 152,000				
Dyersville			PD-CW-14-19	WWTF Expansion Project	2014	II	P&D	2	R	$ 173,000				
Fairfield	5131001		PD-CW-14-12	Sewer system rehabilitation	2014	IIIB	P&D	2	R	$ 1,075,000				
Fairfield	5131001		PD-CW-14-13	Sewer System rehabilitation, infiltration/flow correction/ and correction of Combined sewer system overflow	2014	IIIA	P&D	2	R	$ 1,585,000				
Iowa DNR-Parks - Big Creek	7700905	S2011-0048	1920680 01	Big Creek Pump Station and Force Main	2014	IVA	245	2	R	$ 1,313,000				
Iowa DNR-Parks - Geode State Park		S2011-0278	1920681 01	Wastewater Treatment Upgrade	2014	I	235	2	P	$ 1,111,000				
Martensdale	9147001	S2013-0292	1920682 01	Sewer rehabilitation	2014	IIIB	150	2	P	$ 833,800				
Gilmore City	7607001	S2013-0101	1920672 01	Rehabilitate and repair poor sections of the sanitary sewer collection system.	2013	IIIB	145	4	R	$ 760,879				

Granger	2537001	2012-0169	1920667 01	Wastewater treatment plant improvements	2013	II	240	4	R	$ 4,516,914				
Henderson	66529001	2013-0147	1920674 01	Wastewater Improvements	2013	IVA	125	4	P	$ 100,000				
Maynard	3350001	S2013-0123	1920668 01	Wastewater I/I Reduction	2013	IIIA	142	4	P	$ 315,606				
Montezuma	7950001	S2012-0172	1920670 01	Lining 7000 LF of sanitary sewers, new transmission main, constructing bio-retention swales, constructing new culverts and streets.	2013	IIIB	145	4	P	$ 317,140				
Nora Springs	3423001	2013-0150	1920671 01	Slip lining of sewer main, spot repairs, sewer pipe replacement, new manhole lids, castings, new manhole replacements, lining and grouting.	2013	IIIA	145	4	P	$ 1,031,715				
Pleasantville			PD-CW-13-31		2013	I	P&D	4	R	$ 527,500				
Tama	8670002	S2013-0103	1920669 01	Sanitary Sewer System Improvements	2013	IIIA	145	4	P	$ 677,205				
Wellman	9270661	S2013-0066	1920673 01	WWTP Screen Improvements	2013	IVA	125	4	R	$ 791,446				
Wellman			PD-CW-13-32		2013	I	P&D	4	R	$ 81,283				
Worthington		S2011-0241	1920676 01	Disinfection Project	2013	II	242	4	P	$ 131,250				
Coggon	5722001	S2011-0152	1920658 01	Construction of new wastewater treatment facility to address concerns with mercury, CBOD5, ammonia-nitrogen, flooding, and disinfection	2013	II	237	3	P	$ 3,119,536				
Cumming	9123001	S2010-0142	1920662 01	Construction of South Trunk Sewer Extension, Phase II, to transport wastewater to WRA interceptor and eliminate existing treatment facility	2013	IVB	244	3	P	$ 604,182				
Marengo	4843001	S2013-0052	1920661 01	Infiltration/inflow correction to address permit violations at treatment facility	2013	IIIA	162	3	R	$ 2,179,580				
Mount Union	4455001	S2013-0118	1920664 01	Purchase of existing wastewater system currently owned and operated by Rural Utility Service Systems (RUSS)	2013	II	127	3	R	$ 307,040				
Mt Pleasant	4453001	S2012-0407	1920665 01	Replacement of remaining portions of Snipe Run Interceptor to transfer flows to new wastewater treatment facility	2013	IIIB	125	3	P	$ 1,600,000				
Patterson	6151001	S2011-0078	1920659 01	Upgrade pump station capacity, reduce inflow/infiltration, install new force main with goal of reducing sewer backups	2013	IIIB	165	3	R	$ 54,540				
Wastewater Reclamation Authority	7727001	S2013-0079	1920657 01	WRA Southern Tier Interceptor Phase 10 Segments 15-17 to increase capacity to handle wet weather flows	2013	IVB	115	3	P	$ 6,080,200				

Dakota City			PD-CW-13-15	Infiltration/inflow correction through sewer relining	2013	IIIA	P&D	2	R	$ 85,000				
Kiron	2432001	S2011-0252	1920655 01	New covered aerated lagoon and disinfection, new lift station	2013	II	202	2	P	$ 1,233,715				
Oxford	5260001	S2012-0142	1920652 01	The existing lagoon is overloaded with inflow and infiltration from the collection system. The facility is under enforcement action to reduce excess flow. The project involves using cured-in-place pipe to reinforce existing sewer lines and sealing leaking manholes and service connections.	2013	IIIA	139	1	P	$ 450,000				
Sioux City	9778001	S2010-0080	1920647 02	The Iowa Department of Transportation is constructing improvements to Interstate 29, which requires Sioux City to relocated existing sanitary sewer interceptor and storm sewers.	2013	IVB	130	1	R	$ 20,434,000				
Thornton	1781001	S2012-0134	1920649 01	Leaking of the city's lagoons has been documented. The project involves emptying the lagoons during normal discharge time, removing existing rip rap, installing a new liner system, and replacing rip rap.	2013	I	147	1	P	$ 246,238				
Wapello	5879001	S2011-0196	1920651 01	Wapello's wastewater treatment facility is overloaded hydraulically and organically and cannot meet NPDES limits. The project involves conversion of existing lagoons to a 3-cell aerated lagoon facility.	2013	II	167	1	P	$ 1,230,000				
Calamus	23200001	S2012-0126	1920628 01	WWTP Upgrades 2011-add 3rd lagoon cell	2012	I	149	4	P	$ 925,211				
Clinton (Phase II, Part 2)	2326001	S2005-0016	1920629 01	US 30/67 and Camanche Avenue (Reconstruction & Sewer Separation)	2012	V	144	4	R	$ 3,535,000				
Conesville	7016000	S2012-0176	1920644 01	Replace pump station & provide emergency diesel-powered generator	2012	IIIB	137	4	C	$ 80,800				
Durant	7036001	S2008-0219	1920632 01	Improvements to WWTF incorporate expansion of the plant, an equalization basin, sludge process, UV disinfection & cascade aeration	2012	II	210	4	P	$ 5,796,000				
Elkhart	7730001	S2012-0137	1920634 01	Inflow and infiltration correction	2012	IIIA	129	4	P	$ 609,030				
Elkhart			PD-CW-12-24		2012		P&D	4	R	$ 350,000				

Fort Dodge	9433003	S2012-0171	1920646 01	Improvements to wastewater conveyance system	2012	IIIB	155	4	R	$ 2,038,584				
Hamburg			PD-CW-12-29		2012		P&D	4	R	$ 100,000				
Wheatland	2394001	S2012-0069	1920643 01	Polishing Reactor Treatment Process	2012	II	189	4	C	$ 606,000				
Fort Madison	5625001	S2012-0013	1920622 01	Gravity sewers, submersible pump station and force main	2012	IVA	145	3	R	$ 3,865,422				
Fort Madison	5625001		PD-CW-12-19		2012	IVA,IVB	P&D	3	R	$ 470,000				
Kelley	8548001	S2011-0121	1920624 01	Sanitary sewer improvements	2012	IIIA	165	3	P	$ 172,000				
La Porte City	0743001	S2012-0049	1920625 01	Commercial Street Sanitary Sewer Repolacement Project	2012	IIIB	150	3	P	$ 556,409				
La Porte City	0743001	S2009-0187	1920620 01	Wastewater treatment plant improvements	2012	I,II	220	2	P	$ 917,822				
Nemaha	Unsewered		PD-CW-12-04		2012	I,IIIB	P&D	2	R	$ 75,000				
North English	4858001		PD-CW-11-36		2012	II,IIIA,IIIB	P&D	1	R	$ 140,000				
RUSS (Augusta)	Unsewered		PD-CW-11-39		2012	I,IVA	P&D	1	R	$ 193,000				
RUSS (Croton)	Unsewered		PD-CW-11-40		2012	I,IVA	P&D	1	R	$ 100,000				
RUSS (Wever)	Unsewered		PD-CW-11-46		2012	I,IVA	P&D	1	R	$ 193,000				
RUSS(Moar/Powdertown)	Unsewered		PD-CW-11-44		2012	I,IVA	P&D	1	R	$ 100,000				
Albert City	1103001	S2011-0114	1920608 01	Phase I inflow/infiltration correction; Phase II new lagoon, disinfection	2011	II,IIIA	184	4	P	$ 2,387,264	30%			
Coralville	N/A	N/A	GNS10-4	Green storm water infrastructure	2011	VII-K	120	4	R	$ 2,000,000	30%			
Denver	0915001	S2007-0432	1920609 01	Sewer rehabilitation, new wastewater treatment plant	2011	II,IIIA	184	4	R	$ 6,153,127				
Dubuque (Revised Upper Bee Branch)	N/A	N/A	GNS10-5	Stream daylighting	2011	VII-K	162	4	P	$ 28,823,000	30% of up to $14,767,000			
Geneva	3539000	S2010-0308	1920610 01	New collection system, sand mound treatment	2011	II	169	4	P	$ 518,775	30%			
Clarion	9909001	S2010-0186	1920602 01	Wastewater treatment plant upgrades	2011	II	189	3	P	$ 3,309,871				
Truro	6167001	S2010-0144	1920605 01	Sewer rehabilitation	2011	IIIA	139	3	R	$ 793,860				
Wyoming	5392001	S2009-0239	1920606 01	Lagoon upgrade	2011	I	97	3	P	$ 1,480,812				
Buffalo	8218001	S2010-0278	1920582 01	Converting plant from chlorine to ultraviolet disinfection. Vortex grit removal system and comminutor replaced. Rehabilitating manholes and cleaning existing sanitary sewer.	2011	II	169	2	P	$ 358,550				
Earling	8320001	S2010-0187	1920584 01	Controlled discharge lagoon	2011	II	184	2	P	$ 2,985,661	30%			
Massena	1558001	S2010-0129	1920578 01	Sewer rehabilitation	2011	IIIB	149	2	R	$ 230,000				
Mondamin	4349001	S2007-0165	1920587 01	Sewer rehabilitation	2011	IIIA	139	2	P	$ 83,578				
Wastewater Reclamation Authority	7727001	S2010-0310	1920593 01 (Phase 19 Seg 1-4)	Interceptor sewer to convey wastewater from Bondurant to the Wastewater Reclamation Facility	2011	IVB	150	2	R	$ 16,545,820				
Bennett	1603001	S2010-0120	1920529 01	Sewer rehabilitation, pump station upgrades	2011	IIIA	137	1	R	$ 2,270,000				
Brighton	9209001	S2009-0288	1920515 01	Sewer rehabilitation, wastewater treatment plant upgrade	2011	II,IIIB	140	1	R	$ 2,675,000				
Carlisle	9113001	S2010-0027	1920550 01	Lagoon upgrade	2011	II	215	1	R	$ 303,000				

Carlisle	9113001		PD-CW-10-71		2011	IIIA,IIIB	P&D	1	R	$ 120,000				
Charles City	3405001	S2010-0232	1920551 01	Disinfection	2011	II	170	1	R	$ 2,840,120				
Fayette County Board of Supervisors (Prairie View Care Facility)	3300901	S2010-0149	1920534 01	Lagoon upgrade	2011	I	180	1	C	$ 319,796				
Grinnell	7930001	S2010-0229	1920554 01	Sewer rehabilitation	2011	IIIA	129	1	P	$ 1,295,625				
Hampton	3544001	S2006-0242	1920530 01	New wastewater treatment plant	2011	II,IVB	160	1	P	$ 7,409,158				
Hull	8444001	S2008-0093	1920516 01	Lagoon upgrade, disinfection	2011	II	184	1	R	$ 1,955,057				
Lamont	1061001	S2010-0116	1920576 01	Lagoon upgrade, pump station upgrade	2011	I	140	1	R	$ 1,169,665				
Libertyville	5148001		PD-CW-10-51		2011	I,IIIA,IIIB, VI	P&D	1	R	$ 95,000				
Newhall	653001	S2010-0115	1920577 01	New wastewater treatment plant	2011	II	120	1	C	$ 4,383,347				
Ottumwa (Richmond Ave area)	9083001	S2006-0453	1920565 01	Combined sewer separation	2011	V	175	1	P	$ 3,636,000	30%			
Reasnor	5071001	S2009-0207	1920543 01	Lagoon expansion	2011	I	160	1	R	$ 737,805				
Spencer	2171004	S2010-0111	1920528 01	Combined sewer separation	2011	V	185	1	R	$ 2,300,000				
Underwood	7869001	S2008-0186	1920568 01	Sewer rehabilitation	2011	IIIA	147	1	C	$ 252,399				
Cedar Rapids	5715001	S2010-0127	1920536 01	Wastewater treatment plant upgrade	2010	II	185	4	R	$ 633,000				
Gilbertville	0733001	S2009-0110	1920548 01	New activated sludge treatment plant, disinfection	2010	II	165	4	P	$ 1,692,760				
Fayette	3342001	S2008-0323	1920506 01	Wastewater treatment plant upgrade, disinfection	2010	II	187	3	R	$ 1,031,000				
Mingo	5052001	S2008-0304	1920510 01	Lagoon expansion	2010	I	172	3	R	$ 1,515,000				
Wheatland	2394001		PD-CW-10-10		2010	IIIA, IIIB,V	P&D	3	R	$ 67,000				
Davenport	8222003	S2006-0279	1920490 01	Interceptor sewer	2010	IVB	125	2	P	$ 28,280,000				
Ida Grove	4728001	S2009-0276	1920493 01	Pump station upgrades, disinfection	2010	II,IIIB	169	2	P	$ 298,960				
Eagle Grove	9926001	S2009-0202	1920464 01	Sewer rehabilitation	2010	IIIA	129	1	R	$ 611,923				
Readlyn	0965001	S2009-0030	1920468 01	Disconnect residential groundwater flows to sanitary sewers	2010	IIIA	139	1	P	$ 1,331,000				
Wastewater Reclamation Authority	7727001	S2008-0187	1920375 01	New interceptor sewer to convey wastewater to Wastewater Reclamation Facility	2008	IVB	180	3	R	$ 30,855,000				
Everly	2115001	S2007-0141	1920344 01	Sewer rehabilitation	2007	IIIB	160	4	C	$ 753,000				
										$ 325,394,834			$ -	$ -
Project Status			**Needs Categories**											
Contingency -- C			I		Secondary Treatment									
Dropped -- D			II		Treatment more stringent than secondary									
Ready for Loan-- R			IIIA		Infiltration/Inflow rehabilitation									
Loan Signed -- L			IIIB		Major sewer system rehabilitation									
Planning Stage -- P			IVA		New collectors and appurtenances									
			IVB		New interceptors and appurtenances									
Green Projects			V		Correction of combined sewers									
(*indicates that a business			VI		Stormwater management programs									
case is required)			VII		Non-point source control projects; subcategories below:									
Add Subs					*VIIA*	*Agricultural cropland sources*								
					VIIB	*Animal sources*								
					VIIC	*Silviculture*								
					VIID	*Urban sources*								
					VIIE	*Groundwater protection (unknown sources)*								
					VIIF	*Marinas*								
					VIIG	*Resource extraction*								

					VIIH	*Brownfields*							
					VIII I	*Storage tanks*							
					VIIJ	*Landfills*							
					VIIK	*Hydromodification*							
					XII	*Decentralized septic systems*							

Project Name	DWSRF No.	Project Description	IUP Yr	Project Type	Priority Points	Quarter	Population	Project Status	Current Requests	Loan Forgiveness	Loan Signed	Original Request	Loan Amount
Asbury	FS-31-15-DWSRF-001	Constructing water main looping, installing new well and elevated storage tank	2015	B,E	45	1	4545	P	$ 3,404,700				
Dyersville	FS-31-15-DWSRF-003	Hydrous Manganese Oxide (HMO) addition.	2015	A,B,E	95	1	4058	P	$ 1,021,080				
Ottumwa	FS-90-15-DWSRF-002	Ultra Violet Water Treatment and related facility improvements	2015	A,B	80	1	25023	P	$ 4,000,000				
Sioux Rapids	PD-DW-15-01	Repair current water treatment plant and construct a second treatment plant	2015	G	P&D	1	1298	R	$ 75,000				
Hull	FS-84-14-DWSRF-023	Improvements for increased service	2014	B,C,E	55	4	2185	C	$ 3,839,000				
Breda	FS-14-14-DWSRF-017	Construction of a new water tower.	2014	B,C,E	55	4	486	P	$ 638,320				
Buffalo Center	FS-95-14-DWSRF-019	Construct water treatment plant, water town upgrades and well rehabilitation including new treatment building, treatment plant equipment, rehabilitation of Well #1.	2014	B,C,E	55	4	905	P	$ 1,174,350				
Fonda	FS-76-14-DWSRF-013	Improvements at existing water treatment plant	2014	A,C,E	65	4	666	P	$ 1,336,230				
Keosauqua	FS-89-14-DWSRF-015	Phase 4 of improvements to city's water distribution system by replacing 2250 feel of water mains, 5 hydrants.	2014	B,C,E	40	4	1006	P	$ 455,000				
Keota	FS-54-14-DWSRF-014	Completion of city's Priority 4 and remainder of Priority 2 per 2010 Engineering Report. Project will replace cast-iron water main with new PVC pipe and installation of new main and hydrants	2014	B,C,E	40	4	1009	P	$ 552,672				
Lawler	FS-19-14-DWSRF-018	Well improvements and water main installation including well house, piping, control panel, chemical feed system, water main, valves and hydrants	2014	B,C,E	35	4	439	P	$ 241,300				
Muscatine Power & Water	**FS-70-DWSRF-022**	Watermain replacement project	2014	B	15	4	24386	P	$ 2,432,416				
North Liberty	FS-52-14-DWSRF-020	Design and construction of a new reverse osmosis water treatment plant	2014	B	30	4	13386	P	$ 13,200,000				
Thurman	FS-36-14-DWSRF-021	Construction of a second well and a new filtration system	2014	B,C,E	55	4	229	P	$ 532,169				
Bonaparte	FS-89-14-DWSRF-016	Complete Phases 3 & 4 as presented in 2013 update. These 2 phases will replace cast-iron water main with new mainand add new hydrants	2014	B,C,E	40	4	433	R	$ 304,010				

Keota	PD-DW-14-34	Completion of city's Priority 4 and remainder of Priority 2 per 2010 Engineering Report. Project will replace cast-iron water main with new PVC pipe and installation of new main and hydrants	2014	G	P&D	4	1009	R	$ 50,000				
Muscatine Power & Water	PD-DW-14-44	Water Site Source Analysis	2014	G	P&D	4	24386	R	$ 215,915				
Tripoli	PD-DW-14-23	New water treatment facility	2014	G	P&D	4	1343	R	$ 143,000				
Council Bluffs	FS-78-14-DWSRF-009	Purchase Property adjacent to WW to protect wells from farm contamination	2014	D	15	3	63783	P	$ 2,020,000				
De Soto	FS-24-14-DWSRF-011	New water treatment facility	2014	B,E	25	3	1050	P	$ 3,295,000				
Ida Grove	FS-47-14-DWSRF-008	Add new permanent well	2014	B,E	45	3	2158	P	$ 339,017				
Pella	FS-63-14-DWSRF-012	Construction of a new Jordan Well	2014	B	35	3	10352	P	$ 14,645,000				
Spencer	FS-21-14-DWSRF-010	Water Supply and Treatment Improvements	2014	B	35	3	11235	P	$ 14,680,754				
Halbur	FS-14-14-DWSRF-007	New water storage facility	2014			3	249	R	$ 473,993				
Schleswig	FS-24-14-DWSRF-006	Replacement of aging water main to reduce water loss, looping	2014	B,C,E	40	2	882	P	$ 2,338,000				
Fontanelle	FS-01-14-DWSRF-003	Water main replacement	2014	B,E	30	1	672	P	$ 600,000				
Salix	FS-97-14-DWSRF-001	Construction of a new water tower.	2014	B,C,E	55	1	363	P	$ 500,000				
Coralville	PD-DW-14-01	Expansion of water treatment facility.	2014	G	P&D	1	18907	R	$ 191,000				
Anita	FS15-13-DWSRF-019	Construction of a new municipal drinking water well and water treatment plant.	2013	B,C,E	55	4	972	P	$ 2,308,254				
Libertyville	FS-51-13-DWSRF-017	Address problems with water pressure and water loss due to continual water main breaks.	2013	A,B,C,E	55	4	315	P	$ 964,045				
Macedonia	FS-78-13-DWSRF-015	Water main replacement due to aging and leaks	2013	B,C,E	40	4	246	P	$ 294,970				
Stanton	FS-69-13-DWSRF-020	Complete rehab/replacement of 13,000 lf of distribution system, replacement of 172 water meters and demolition of old water tower.	2013	B,C,E	40	4	689	P	$ 1,003,334				
Stanwood	FS-16-13-DWSRF-021	Construction of approx 2700 lineal feet of new 6 inch PVC pipe, including new valves, hydrants.	2013	B,C,E	40	4	684	P	$ 786,841				
Tripoli	FS-09-13-DWSRF-018	New water treatment facility to replace 60 year old one.	2013	B,C,E	35	4	1313	P	$ 1,201,900				
Hancock	FS-78-13-DWSRF-010	Construction of a new water distribution system with new 6" PVC mains to replace asbestos cement pipe	2013	A,B,C,E	55	3	196	P	$ 1,300,779				
Lytton	FS-81-13-DWSRF-014	Expansion of existing treatment plant to adequately meet peak system demands and provide redundancy	2013	B,C,E	50	3	315	P	$ 652,207				
Okoboji Camp Owners Coop	FS-30-13-DWSRF-011	Distribution system replacement	2013	B,E	30	3	358	P	$ 796,880				

Toledo	FS-86-13-DWSRF-013	New water treatment facility to meet current design standards, install redundant equipment for radium removal	2013	A,C,E	65	3	2341	P	$ 3,075,450				
Hawkeye	FS-33-13-DWSRF-007	New well to replace failing backup well, new wellhouse and controls, and water main replacement to eliminate 2" main	2013	B,C,E	55	2	449	P	$ 818,000				
Lenox	FS-87-13-DWSRF-004	Water main looping and replacement, replacement of pump station	2013	B,C,E	40	1	1407	P	$ 212,000				
Stacyville	FS-66-13-DWSRF-002	Water main replacement to eliminate flow bottleneck and replace old cast iron main	2013	B,C,E	40	1	494	P	$ 355,000				
Marble Rock	FS-34-13-DWSRF-003	Water system improvements including reduntant well and water main looping and replacement	2013	B,C,E	55	1	307	R	$ 604,000				
Oakland	FS-78-13-DWSRF-005	New 300 gpm reverse osmosis plant to provide redundancy to lime softening plant	2013	B,C.E	50	1	1486	R	$ 1,608,000				
Sioux City	FS-97-13-DWSRF-001	I-29 Utility Relocation	2013	B	20	1	82684	R	$ 2,541,000				
Cedar Falls Utilities	FS-07-12-DWSRF-028	Water main extension to connect homes with nitrate contaminated private wells	2012	A	35	4	39260	P	$ 1,380,670	50%			
Hills	FS-52-12-DWSRF-021	New system to eliminate contaminated private wells	2012	A,B,E	105	4	703	P	$ 3,832,000	50% of eligible costs			
Charlotte	FS-23-12-DWSRF-024 (2)	New shallow well source to blend with high radium well	2012	A,B,C,E	105	4	394	R	$ 190,000	50%			
Shenandoah	FS-73-12-DWSRF-020	Water meter replacement	2012	B,C,D,E	45	4	5546	R	$ 80,800	20%			
Albia	FS-68-12-DWSRF-008	Water main replacement	2012	B,C,E	40	2	3706	P	$ 350,000				
Churdan	FS-37-12-DWSRF-007	Running 9 miles of pipe to hook onto Xenia's water pipeline.	2012	A,B,E	85	2	386	P	$ 1,284,316	50%			
Ryan	FS-28-12-DWSRF-005	New Silurian well with emergency power and control building	2012	B,E	45	2	410	P	$ 128,000				
Palo	FS-57-12-DWSRF-003	New water treatment plant for new municipal system	2012	A,E	55	1	899	R	$ 1,040,200				
Des Moines Water Works	FS-77-11-DWSRF-036	New variable frequency driven pump to maximize use of infiltration gallery water, avoiding the need to use reverse osmosis system	2011	B	15	4	223364	C	$ 675,000	20%			
Ralston	FS-14-11-DWSRF-034	Redundant well, booster pump installation, treatment plant upgrades	2011	B,C,E	55	4	98	P	$ 343,600	40%			
Story City	FS-85-11-DWSRF-037	Water meter replacement	2011	B,E	30	4	3228	P	$ 207,000	20%			
Aplington	FS-12-11-DWSRF-032	Iron filtration and softening plant rehab	2011	B,E	30	4	1054	R	$ 945,000				
Le Mars*	FS-75-11-DWSRF-022	Meter replacement, automatic meter reading system	2011	B,E	30	4	9270	R	$ 1,010,000	20%			
Frankville (Winneshiek Co BOS	FS-96-11-DWSRF-012	New public water supply to replace private wells	2011	A,E	45	2	125	P	$ 762,449	50%			

New London	FS-44-11-DWSRF-001	New ground storage reservoir, high service pump, standby power, and water main replacement	2011	B,C,E	55	1	815	R	$ 741,000				
Hudson	FS-07-11-DWSRF-006	New well and distribution system to provide supply for Hudson, which is currently consecutive to Waterloo	2011	B,E	45	1	2117	P	$ 2,973,634				
Kelley	FS-85-11-DWSRF-008	New well and treatment, EST, raw water main, and water main replacement	2011	B,E	45	1	300	P	$ 1,825,070	30%			
Mason City	FS-17-10-DWSRF-069	Replacement of elevated storage tank with same size; new security fence	2010	B	35	4	29172	C	$ 1,085,750				
Ainsworth	FS-92-10-DWSRF-066	Water main looping and replacement	2010	B,C,E	40	4	524	P	$ 202,000				
Fremont	FS-62-10-DWSRF-054	Water main replacement and 50 water meters	2010	B,C,E	40	4	704	R	$ 760,530				
Ames	FS-85-10-DWSRF-046	New 15 million gallon/day lime softening plant, construction of LEED certified building	2010	B	35	3	50731	P	$ 51,315,000	20% of LEED building construction			
Mahaska Rural Water System, I	FS-62-10-DWSRF-042	Two new wells, auxiliary power, upgrade water treatment plant, and add emergency connection with booster pumping to Oskaloosa Municipal Water System	2010	B,E	45	3	7000	R	$ 3,609,600				
Oto	FS-97-09-DWSRF-016	New water storage tank	2009	B,C,E	40	4	145	P	$ 61,065				
									$ 166,023,270			$ -	$ -
Project Status	**Project Type**												
Contingency -- C	A = Water Quality and Human Health Risk-Related Criteria												
Dropped -- D	B = Infrastructure and Engineering-Related Improvement												
Ready for Loan -- R	C = Affordability Criteria												
Loan Signed -- L	D = Special Category Improvements												
Planning Stage -- P	E = Project Serves Population less than 10,000												
	F = Supplemental Loan for Previously Approved Project												
Green projects (* business case required)	G = Planning and Design Loan												
Disadvantaged Communities													
Public Health Projects													

Iowa Department of Natural Resources
Environmental Protection Commission

ITEM **10** **DECISION**

TOPIC **Contract – Iowa Department of Agriculture and Land Stewardship – Union Grove Lake Watershed Project – Phase 1A Water Quality Improvement**

Recommendation:
The Department requests Commission approval of a contract in the amount of $56,829 with the Iowa Department of Agriculture and Land Stewardship for one year to promote best management practices in the Union Grove Lake Watershed.

Funding Source: Federal – Environmental Protection Agency
This project will be funded through Section 319 of the Clean Water Act.

Background:
Originally funded in 2008, the Union Grove Watershed Project has focused on reducing sediment and phosphorus loading from the watershed. In 2012 a large portion of the watershed was protected with the purchase of 80 acres north of the lake. This property provides treatment for 60% of the watershed. The remaining watershed issues will be the focus of this contract.

Purpose:
The parties propose to enter into this contract for the purpose of implementing watershed improvement practices and water quality educational programming for the project selected.

Contractor Selection Process:
This project was chosen using a grant proposal application and committee review process. Selection members consist of Iowa DNR, Iowa Department of Agriculture and Land Stewardship, Natural Resource Conservation Service, Iowa State University, and Conservation Districts of Iowa.

Scope of Work:
For an outline of the **scope of work**, see the attached project summary.

Kyle Ament, Environmental Specialist
Watershed Improvement Section, Water Quality Bureau
Environmental Services Division

May 21, 2014

DNR Section 319-Funded Watershed Project Summary

PROJECT NAME: UNION GROVE LAKE WATERSHED PROJECT PHASE 1A
Amount: $56,829
Time Frame: July 1, 2014 – June 30, 2015
Description: Funding for an existing watershed project.
Project Goal: Reduce phosphorus loading to Union Grove Lake.

Union Grove Lake Watershed includes 6,949 acres in Tama and Marshall Counties with a lake surface area of 96 acres. The lake is located within a one-hour drive of 1.2 million Iowans and is the central feature of Union Grove State Park, a popular outdoor recreation area. Lake activities include boating, fishing, and swimming while the park provides a campground, two boat ramps, a beach, hiking trails, and several picnic sites, including a roofed picnic site adjacent to a handicap-accessible fishing jetty. On a typical summer weekend, 4,500 people will utilize the lake and park amenities with 162,740 park visitor days recorded in 2009.

The lake's Water Quality Improvement Plan (TMDL), released in July 2009, identifies nonpoint sources and internal recycling of phosphorus from bottom sediments as adversely affecting lake water quality. These sources affect turbidity either due to algal growth or inorganic suspended solids. In 2012 the Union Grove Watershed Management Plan was completed to address the phosphorus issue in the watershed. The watershed management plan's goals include a 52% reduction in total phosporus by the year 2020.

This contract will address priority concerns listed in the watershed management plan. Funding will be used for salary, benefits, public outreach, and best management practices. These practices include grade stabilization, stream buffers, reduced tillage, grassed waterways, terraces, alternative watering systems, and exclusion fencing. Partners involved in the project include Tama Soil and Water Conservation District, Natural Resources Conservation Service, Union Grove Lake & Park Holding Corporation, and landowners.

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM **11** **DECISION**

TOPIC **Contract with IOWA STATE UNIVERSITY for National Water Quality Initiative (NWQI) Monitoring in the Black Hawk Lake Watershed**

Recommendations:
Commission approval is requested for a five and a half year service contract with Iowa State University of Ames, Iowa. The contract will begin on July 1, 2014 and terminate on December 31, 2019. The total amount of this contract shall not exceed $461,661.

Funding Source:
This contract will be funded through Section 319 of the Federal Clean Water Act.

Background:
Through the National Water Quality Initiative (NWQI), a joint effort between the EPA and NRCS, local Soil and Water Conservation Districts (SWCDs) are working with landowners and producers to improve water quality in four priority HUC 12 watersheds across Iowa. One of these watersheds, the Black Hawk Lake watershed, was selected for intensive paired subwatershed and in-stream monitoring as part of the NWQI program because of an active and successful project, with many BMPs being implemented on private and public lands. The goal of NWQI monitoring in the Black Hawk Lake watershed is to determine if water quality improvement strategies have been effective at reducing sediment and nutrient loads, which are priority pollutants under the NWQI program.

Purpose:
The parties propose to enter into this Contract for the purpose of retaining the Contractor to provide: Collection, analysis, and evaluation of water quantity and quality monitoring data. The data collected will be used to determine if pollutant load reduction strategies have been effective, and to quantify long-term water quality trends before, during, and after active BMP implementation efforts.

Contractor Selection Process:
Iowa State University was chosen using the process specified in accordance with Iowa Code Section 455B.103, which allows DNR to contract with "public agencies of the state" for those services. Iowa State University was chosen for this project because of the contractor's extensive and specialized experience in successfully completing work of this nature.

Contract History:
This is a new contract.

Allen Bonini
Supervisor – Watershed Improvement Section
Water Quality Bureau – Environmental Services Division
June 17, 2014

Attachment(s): Scope of Work from the Special Conditions for Contract

Section 5 STATEMENT OF WORK

5.1 Statement of Work. ISU shall be responsible to perform the following tasks as described by the Task Milestone Dates set out in the following table:

Obligation	Task Milestone Date
Task 1: Equipment installation **Description:** Contractor shall purchase and install three ISCO 674 Rain Gages, two ISCO 750 Area Velocity Flow Modules, two ISCO 720 Pressure Transducer Modules, and four ISCO 6712 modems. Contractor shall purchase and install all required accessories, including but not limited to: software, cables, batteries, solar panels, and sample bottles. Contractor shall also install four ISCO 6700-Series automated samplers provided by DNR. Equipment shall be installed at the locations shown in Figure 1, per the direction of the DNR contract manager. The equipment obtained for use on this project shall be the property of DNR.	No later than August 1, 2014.
Task 2: Event sample collection for 3 surface runoff sites and 1 tile outlet site **Description:** Contractor shall collect a flow-weighted composite sample from each ISCO for up to 10 storm events per location per year. Event samples shall be composited in a manner approved by the DNR contract manager, and shall be collected between March 15 and November 15 of each year, unless temperatures/ or conditions prohibit sample collection.	Task Milestone dates shall be the last day of each month in which samples are collected, throughout the term of the contract.
Task 3: Grab sample collection **Description:** Contractor shall collect up to 20 grab samples per year from each site as conditions allow and per DNR contract manager instructions. Weekly flow-weighted composite samples may be substituted for grab samples at the tile outlet location, with advanced written approval from the DNR contract manager.	Task Milestone dates shall be the last day of each month in which samples are collected, throughout the term of the contract.
Task 4: Water quality sample analysis **Description:** Contractor shall analyze all samples collected under Tasks 2 and 3 for the following parameters: nitrate-nitrogen, ammonia-nitrogen, total nitrogen, total phosphorus, dissolved reactive phosphorus, total suspended solids, and volatile suspended solids. For analytical results below the quantitative limit, the test quantitative limit shall be reported as "less than." Before samples are collected, a Quality Assurance Protection Plan (QAPP) shall be completed in a format agreed upon by both parties.	Samples shall be analyzed no later than holding times established by the QAPP. Task Milestone dates shall be the last day of each month in which samples are collected, throughout the term of the contract.
Task 5: Equipment repair **Description:** Contractor shall notify the DNR contract manager immediately upon discovery of broken or malfunctioning equipment. Contractor shall repair equipment as necessary in order to complete the tasks listed above.	Repairs needed during each month shall be completed by no later than the last day of each month of the contract.
Task 6: Quality Assurance/Quality Control **Description:** Contractor shall submit information on data quality requirements and assessments (such as detection limit, quantitation limit, estimated accuracy and accuracy protocol, estimated precision and precision protocol) to DNR for any sample upon request. Information on the analytical reference method, sample preservation and holding time also shall be provided if requested. Contractor shall provide copies of revised Methods Manuals and Standard Operating Procedure Manual to the DNR upon request. Copies of manual and procedures shall be	Task Milestone dates shall be the last day of each month in which samples are analyzed, throughout the term of the contract.

available from the laboratory.	
Task 7: Reporting **Description:** Contractor shall prepare and submit written semi-annual progress reports to DNR. Progress reports shall cover the periods of June 1 to November 30, and December 1 to May 31, each year. Progress reports shall include explanation of data collected and basic presentation of results, preliminary observations/findings, and a discussion of challenges/problems encountered that may have hindered collection and/or analysis. Contractor shall prepare a written final report (in place of the final semi-annual progress report) that addresses the central question "Are water quality improvement strategies in the Black Hawk Lake Watershed positively impacting water quality?" The final report shall also: (1) Provide a comparison of actual accomplishments to the objectives established for the project. If project objectives were not met, an explanation shall be included; and (2) Identify the total documented project costs incurred, including federal Section 319 funds expended and other funds expended, during the term of the Contract; and (3) Provide a description of project accomplishments, outputs and outcomes during the term of the Contract.	Progress reports due no later than December 15 and June 15 of each year throughout the term of the contract. Final report due no later than November 15, 2019.
Task 8: Data transfer **Description:** Contractor shall make the data generated pursuant to this Contract available to DNR electronically in a format approved by DNR contract manager. The available sample information shall include the STORET station identification number, which will be provided by DNR for all monitoring locations.	Analytical chemistry data shall be made available to DNR staff no later than 15 calendar days following the end of the month of data analysis. If the contractor determines that extra time is needed to complete required data transfer, a written notification shall be made to the DNR contract manager. The notification shall include the reason for the delay and the specific analytical chemistry data requiring delayed reporting. The notification shall occur as soon as possible after the contractor has determined the need for a reporting delay.

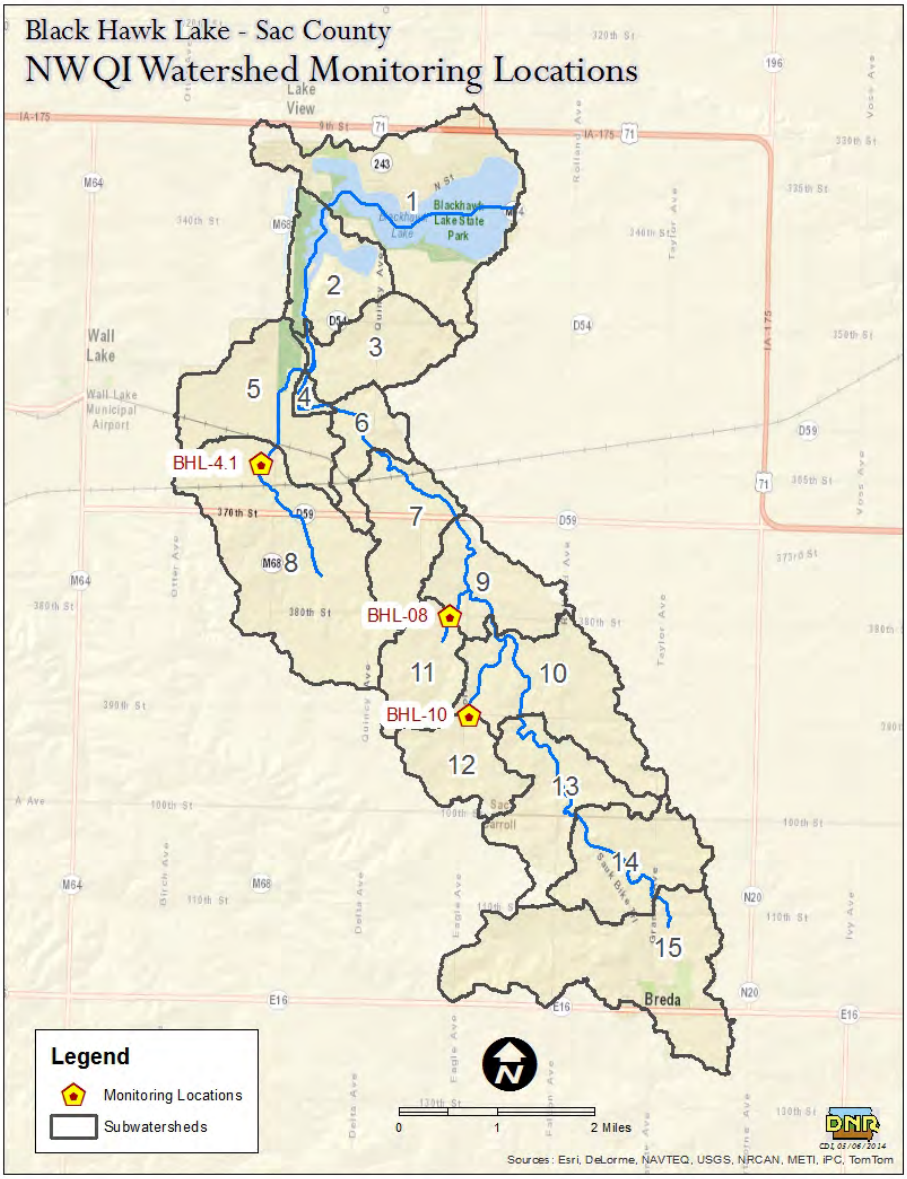

Figure 1. Watershed monitoring locations.

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM **12** **DECISION**

TOPIC **Contract amendment with Iowa Department of Agriculture and Land Stewardship – Division of Soil Conservation for Easter Lake Watershed Project Phase 1.**

Recommendations:
Commission approval is requested for an amendment to the amount of the Easter Lake Watershed Project Phase 1 contract with the Iowa Department of Agriculture and Land Stewardship – Division of Soil Conservation. This is a three year contract that began on November 1, 2013 and will terminate on June 30, 2016. The current amount of the contract is $415,786. Commission approval is requested to amend the amount to $460,786. This is an addition of $45,000 or 11% of the total contract amount. Commission rule requires that any contract amendment in excess of $25,000, or 10% of the original contract, whichever is greater, be approved by the Commission. See 567 IAC chapter 8 (incorporating by reference 561 IAC chapter 8).

Funding Source: Federal – Environmental Protection Agency. This project will be funded through Section 319 of the Clean Water Act.

Background:
Watershed Implementation Grants from the Iowa DNR Watershed Improvement Program intend to put an EPA nine-element Watershed Management Plan (WMP) into action by providing local watershed groups access to federal Section 319 grant dollars. Easter Lake suffers from poor water clarity, algal blooms, high sedimentation rates, low oxygen concentrations, and a poor fishery. In response to these water quality problems, area stakeholders worked together to develop the Easter Lake Water Quality Management Plan (WQMP). The WQMP serves as the culmination of existing studies, citizen and stakeholder input, and a consultant's recommendations for structural and non-structural BMPs intended to reduce stormwater runoff and delivery of pollutants to the lake and ultimately renovate Easter Lake through dredging and other in-lake improvements. This project began in fall of 2013.

Contract History:
On October 14, 2013 the Commission approved the Easter Lake Watershed Project Phase 1 contract with the Iowa Department of Agriculture and Land Stewardship – Division of Soil Conservation for the amount of $415,786. This contract is being amended to include an additional $45,000 for removal of invasive species within Easter Lake Park. This is the first amendment to this contract.

Rachel Glaza
Project Officer
Water Quality Bureau – ESD
May 27, 2014

Easter Lake Invasive Management Zones

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM **13** **DECISION**

TOPIC **Contract with University of Iowa for Laboratory Certification**

Recommendation: Commission approval is requested for a 2 year - service contract with the University of Iowa – State Hygienic Laboratory (SHL) of Iowa City, Iowa. The contract will begin on July 1, 2014 and terminate on June 30, 2016. The total amount of this contract will be approximately $300,000.

Funding Source: This contract will be funded through Laboratory Certification Fees collected pursuant to 567 Iowa Administrative Code (IAC) 83.3 (455B). The fees paid by laboratories support 100% of the cost of the contract. The contract agreement amount is an estimate because actual cost will be based on the number of laboratories applying for certification in each year of the contract. The IDNR pays 86.0% of the collected fees to SHL through this contract.

Background: The Iowa Department of Natural Resources (IDNR) certifies environmental laboratories throughout the United States for the Clean Water Act (CWA) [wastewater (WW)], drinking water (SDWA), solid waste or contaminated sites (SW/CS) and underground storage tank (UST) environmental programs. The SHL provides technical support as the laboratory appraisal authority. Any laboratory that provides environmental compliance data for Iowa programs must be certified in Iowa. Currently, there are 185 labs certified by the IDNR.

Purpose: The DNR is entering into this Contract with SHL to perform the duties specified in 587 IAC Chapter 83. SHL serves as the state environmental and public health laboratory and possesses the required expertise to conduct this program. SHL will be responsible for reviewing applications from the laboratories, conducting on-site audits of in-state labs, reviewing documents, conducting on-site visits for reciprocal certification of out of state labs, preparing audit and certification documents, providing technical assistance to DNR and Iowa certified laboratories, and maintaining a database to track information, due dates and required actions.

Contractor Selection Process: The SHL was chosen because it is a state public agency that can provide these services. SHL is the state environmental and public health laboratory. The selection of SHL is authorized by Iowa Code chapter 455B.103(3).

Contract History: The IDNR has administered this program since 1986 and has utilized the SHL as the appraisal authority during this time. Fees collected by IDNR have been disbursed to SHL through a formal agreement and in recent years, a contract. The IDNR is authorized to contract with the SHL for these services under Iowa Code chapter 455B.103(3).

Kathleen Lee
Senior Environmental Specialist
Water Quality Bureau
Environmental Services Division
June 17, 2014

Iowa Department of Natural Resources
Environmental Protection Commission

ITEM **14** **DECISION**

TOPIC **Contract with Windsor Solutions, Inc. for State & Local Emissions Inventory Systems (SLEIS)**

Recommendation:
Commission approval is requested for a one-year Information Technology service contract with Windsor Solutions, Inc. The contract is anticipated to begin on September 1, 2014 and terminate on September 1, 2015. The total amount of this contract shall not exceed $70,000.

Funding Source:
Funding for this contract is from an EPA Exchange Network Grant.

Background:
The DNR applied for and received a federal fiscal year 2013 Exchange Network Grant to implement the State and Local Emission Inventory System (SLEIS). The total amount awarded was $166,360, of which $70,000 is allocated for contracting with Windsor Solutions to install, configure, support, and license SLEIS for a one year period. SLEIS was developed under an EPA Challenge Grant by Windsor Solutions and a consortium of six state and municipal air quality programs. The DNR completed an extensive analysis of SLEIS in 2013 and plans to copy emissions inventory data from DNR's existing system, SPARS, to SLEIS.

This project will begin Phase 1 of modernizing and replacing DNR's State Permitting & Air Reporting System (SPARS). SPARS is a DNR-owned system that has been in production for nearly fifteen years. SPARS was created to allow businesses to submit permit applications and emissions inventory reports to the DNR electronically, as well as to provide project tracking and to meet federal reporting requirements for emissions inventory data. The technology that is used to deploy SPARS needs to be updated and SLEIS has been identified as an "off the shelf" product that meets DNR's need for updating the emissions inventory features of SPARS. SLEIS meets DNR's IT application design standards, EPA's emissions inventory reporting requirements, and was developed collaboratively by a group of states with similar business needs as the DNR.

SLEIS will be implemented, tested, and used internally by the DNR in 2015, during which time an acceptable replacement is further analyzed for the permitting features of SPARS (Phase 2). SLEIS testing by representative industries and consultants will also be requested.

Purpose:
The purpose of this contract is to install, configure, license, and provide one year support of the SLEIS system.

Contractor Selection Process:
A Request For Information (RFI) was published in 2009, in which seventeen vendors provided information related to modernizing SPARS. DNR staff met with each vendor, including Windsor Solutions, to learn more about each product or service. SLEIS was in the process of being developed at the time of the RFI and was the only "off the shelf" system being developed specifically to flow air quality data to EPA's Emissions Inventory System. The other vendors offered business requirement development services, custom application development, code migration services, and other similar solutions. DNR did not proceed further with the competitive bidding process at that time.

After the DNR was awarded the FFY 2013 Exchange Network Grant, the DNR received approval to initiate the SLEIS project from the State Chief Information Officer, State of Iowa Technology Coordinating Committee, and DAS Director in November 2013. The Sole Source Procurement was approved by the Iowa Department of Management at the end of April 2014.

Scope of Work Requirements:
1. Installation of SLEIS software on DNR production/test servers.
2. Configuration of SLEIS software to meet DNR's business use, including establishing help text, and configuring data entry rules using the Software configuration engine.
3. Three days of onsite training at DNR offices on the use and customization of the SLEIS software.
4. Delivery of source code for the SLEIS software.
5. One hundred hours of labor support during the one year term of the contract.
6. Delivery of general updates to the SLEIS software during the term of the contract.

Jason Marcel
Environmental Program Supervisor
Air Quality Bureau
Environmental Services Division
June 17, 2014

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM **15** **DECISION**

TOPIC **Contract with University of Iowa on behalf of the STATE HYGIENIC LABORATORY for 2015 SHL Services in Support of the DNR Air Quality Bureau**

Recommendations: Commission approval is requested for a one year-service contract with the University of Iowa on behalf of the State Hygienic Laboratory. The contract will begin on 7/1/2014 and terminate on 6/30/2015. The total amount of this contract shall not exceed $2,096,268.

Funding Source: Funding for this contract consists of federal 103 grant funds ($388,310), air contaminant funds ($1,395,014), and State "Environment First" funds ($312,944).

Background: Under Iowa Code 455B.103, the department has responsibility for conducting ambient air monitoring in the State of Iowa. SHL currently operates most of the ambient air monitoring sites in Iowa. It also provides analytical and technical support for ambient air monitoring activities throughout the State. It weighs and determines the ionic composition of particulate samples and performs analysis of air samples for many toxic compounds found in urban air. SHL also provides analysis of asbestos samples gathered by DNR inspectors. The SHL quality assurance group conducts annual audits of SHL ambient air monitoring activities as well as those of the Local Programs. This contract provides for a continuation of these essential services.

Purpose: The parties propose to enter into this contract for the purpose of retaining SHL to perform ambient monitoring and related services in support of the department's Air Quality Bureau.

Contractor Selection Process: The University of Iowa State Hygienic Laboratory was chosen for this project in accordance with Iowa Code 455B.103, which directs the department to contract with other State agencies for services, if possible. Iowa Code 263.7 establishes environmental investigations as an essential duty of SHL, and SHL has considerable experience and expertise in this area.

Contract History: The DNR has contracted with the University of Iowa for ambient air monitoring services for over thirty years. This contract represents ongoing services provided by SHL to the Air Quality Bureau and is renegotiated annually.

The last contract total was $2,069,228. The 1.3% increase is due to increased costs for personnel and analytical services. There are no significant changes to the scope of work during this contract period.

Sean Fitzsimmons
Environmental Specialist Senior
Air Quality Bureau, Environmental Services Division
June 17, 2014

Section 5 STATEMENT OF WORK

5.1 Statement of Work. Contractor shall perform the tasks indicated below on the schedule described in Appendices A and C.

5.1.1 STAFFING SHL will provide adequately trained staff to be able to perform the tasks in this contract.

5.1.2 QUALITY ASSURANCE

5.1.2.1 Internal Quality Assurance Activities (Within SHL's Reporting Organization)

Quality System. SHL shall develop and implement a Quality System in accordance with EPA guidance in order to assure the quality of its air monitoring activities. The Quality System developed by SHL shall insure that the environmental data generated by SHL meets the requirements of EPA and/or the DNR. This will include development and implementation of a Quality Management Plan (QMP) according to EPA guidance document QA/R-2, development and implementation of Quality Assurance Project Plans (QAPP's) consistent with EPA guidance document QA/R-5, and development and implementation of Standard Operating Procedures (SOP's) for operation of air monitoring equipment, data handling, laboratory analyses, and other repetitive procedures. The QAPP/SOP's shall be reviewed and revised as necessary to remain current with EPA requirements outlined in 40 CFR Part 58, guidance in the current edition of EPA's Quality Assurance Handbook for Air Pollution Measurement Systems ("the Redbook 2013"), and applicable EPA guidance or DNR agreements. SHL shall designate members of its Air Monitoring Staff as QAPP/SOP reviewers. A complete set of QMP/QAPP's/SOP's for all air monitoring activities shall be submitted to the DNR in hard copy and electronically in PDF format as a component of the annual review of air monitoring activities.

Revision of Quality Assurance Documents. Substantive revisions of SHL's QMP/QAPP's/SOP's require approval of the DNR and EPA. Electronic copies of all proposed revisions to quality assurance documents shall be provided to the DNR at least thirty (30) days prior to compliance monitoring data generation. QAPP/SOP revisions shall be submitted to EPA/DNR within forty (40) days following (1) promulgation of new monitoring rules or procedures by EPA as requested in writing (email) from the DNR, or (2) written notification of a deficiency in procedures by EPA/DNR. Upon receipt of new equipment for which no QAPP/SOP exists, SHL shall develop a new SOP for operation of the equipment within sixty (60) days of equipment receipt unless otherwise indicated in the special projects section of this contract. SHL shall not deploy monitoring equipment for compliance monitoring without an associated QAPP/SOP.

EPA Audit programs. SHL shall participate in EPA's National Performance Audit Program (NPAP), the performance evaluation program (PEP) for PM2.5 monitoring, and EPA technical systems audits (TSA's) as requested by the DNR. SHL shall fund at least one annual NPAP audit for all monitors for which NPAP audit devices are available. SHL shall conduct additional audits including but not limited to performance audits, systems audits, and review of quality assurance documents (e.g. QMP's, QAPP's or SOP's) at the request of the DNR.

Annual Network/Quality Assurance Review. On an annual basis, SHL shall demonstrate that its quality system is sufficiently developed, and that its monitors are appropriately sited. In addition, SHL shall review its AQS/PARS data and site/monitor parameters in the AQS database for errors during the previous calendar year, and then generate graphical and statistical summaries of the data. SHL shall evaluate the data relative to EPA acceptance criteria for data completeness, precision and accuracy. On the basis of this review, SHL shall submit its annual State and Local Air Monitoring Stations (SLAMS) certification letter. The Annual Network/Quality Assurance review shall contain the following components:

- a complete, current set of Quality assurance documentation (QMP/QAPP's/SOP's) submitted to the DNR in hard copy and electronic format (PDF),
- AQS/PARS raw data listings generated from the AQS system (AQS AMP251 and AMP350 reports) in electronic format for all monitors operated by SHL for the calendar year under review,
- graphs of concentration vs. time submitted in hard copy and electronic formats for all monitors operated by SHL for the calendar year under review,
- completed current National Ambient Air Monitoring Technical Systems Audit Form contained in Volume II Appendix H, of EPA's Quality Assurance Handbook for Air Pollution Measurement Systems (May, 2013), in hard copy and electronic format,
- an annual quality assurance report following the example contained in Volume II Appendix I, of EPA's Quality Assurance Handbook for Air Pollution Measurement Systems (May, 2013), in hard copy and electronic formats,
- written reports of findings and recommendations based on the annual review in hard copy and electronic formats,
- an annual SLAMS report (AQS AMP 450NC), a summary report of precision and accuracy data (AMP600), additional reports as specified by EPA for data certification, as well as a letter certifying the accuracy of the reports based on a review of all materials contained in the annual review in hard copy and electronic formats.

The Annual Network/Quality Assurance Review shall be submitted to the DNR by March 15.

SHL will conduct an annual systems audit of the toxics, metals, ions, and filter weighing laboratories using a protocol approved by the DNR and consistent with EPA Guidance (EPA QA/G7). Reports summarizing the most recent toxics

and filter weighing laboratory audits shall be submitted to the DNR as a component of the Annual Network/Quality Assurance Review.

5.1.2.2 External Quality Assurance Activities (Outside SHL's Reporting Organization)

Polk and Linn County Quality Assurance Audits. SHL will perform quality assurance reviews of the Polk and Linn County Local Programs air quality laboratories and monitoring programs using the forms and procedures found in Volume II, Appendix H, of the Quality Assurance Handbook for Air Pollution Measurement Systems (May, 2013). The questionnaires shall be completed and submitted to the DNR by SHL no later than March 15, and written reports of findings and recommendations will be provided, in duplicate, no later than April 1, or within two weeks of receipt of completed questionnaire from Polk and Linn Counties, whichever is later.

Prevention of Significant Deterioration (PSD) Ambient Monitoring Sites. Within thirty (30) days of DNR's written request SHL will review and provide written comments on the standard operating procedures and quality assurance plan components of facility PSD ambient monitoring plans. SHL will continue to work with facilities to ensure that the data gathered during the monitoring period is of acceptable quality. SHL shall observe and evaluate (quarterly) site audits of facility-run PSD ambient monitoring sites at specified PSD facilities. These site audits are to be performed in accordance with Appendix A of 40 CFR Pt. 58. SHL will notify the DNR when an audit was performed. Within two (2) weeks of receiving the site audit data, SHL will provide, in writing, the audit results and any recommendations for corrective actions to both DNR and the field staff operating the PSD site(s). To ensure format compatibility with EPA's AQS database, SHL will provide quality assurance reviews on ambient monitoring data generated by facility-run PSD monitoring sites, as specified by DNR within thirty (30) days of DNR's written request. The number of PSD monitoring sites shall be limited to no more than four (4) sites per year. SHL will be compensated for additional sites at the rate of $1000 per site, to be billed to its "Operation and Expenses" variable cost line item.

5.1.3 EXISTING NETWORK AND NETWORK MODIFICATIONS

Network Modifications. SHL shall operate the monitoring network indicated in Appendix B with modifications as indicated in Appendix C. In addition, SHL shall work with the DNR to site additional monitors in response to public health concerns that develop during the contract period, as resources and time allow.

New Monitoring Sites. Potential monitoring sites will meet the specifications set forth in Appendices D and E of 40 CFR 58. SHL shall not set up a new monitor site, dismantle an existing monitor site, or relocate any existing monitors without written approval from DNR.

Change in Sampling Frequency. SHL shall change sampling frequency at a monitor site within thirty (30) days of written notice by the DNR.

5.1.4 NETWORK PLANNING

Training and Safety Plan. SHL shall implement training and safety plans developed for all air monitoring staff. SHL shall ensure that its staff are adequately trained and work in a safe environment

Inventory. SHL shall maintain a complete and current list of all equipment which is part of the air monitoring system in the state of Iowa, including the location, description of equipment type, model number, serial number, ownership agency, and DNR and/or SHL inventory tag number. SHL shall record in the equipment inventory the installation date for any equipment newly installed in the air monitoring system.

For the purposes of this agreement, equipment is any item that has an acquisition value of $5,000 or more and an anticipated useful life of one (1) year or more. See Chapter 110-110.2(1) of the Iowa Administrative Code.

This agreement shall supersede any and all agreements by and between the DNR and SHL with respect to equipment. Equipment purchased under previous DNR/SHL agreements or purchased through amendment to this agreement is to be listed on the joint DNR/SHL equipment inventory. SHL shall ensure through the University of Iowa equipment inventory process that all equipment listed on the joint DNR/SHL inventory has been marked with University of Iowa property tags.

Equipment listed in the DNR/SHL Equipment Inventory includes equipment that was obtained in part from federal grant funds. In accordance with Title 40 Code of Federal Regulations, Part 30, the DNR as the grantee agency retains title to all equipment listed on the DNR/SHL Inventory and may require its return upon 30 days written notice.

SHL shall account for all equipment on the DNR/SHL equipment inventory in the event of damage, loss or theft incurred through normal usage.

SHL shall use the equipment in a careful and proper manner and provide routine repairs, service and supplies required for the normal operation of the equipment.

The DNR and SHL shall agree in writing prior to subleasing or transferring rights to the equipment to any third party.

The DNR shall have the right to enter the premises where the equipment is located for the purpose of inspecting the equipment at any reasonable time.

SHL shall submit to the DNR an annual inventory of joint DNR/SHL equipment. The following shall be included as part of such inventory.

- UI property tag number.
- Equipment description.
- UI purchase order number.
- UI purchase order date.

- Equipment cost as shown on invoice.
- A list of additions to the previous year's inventory including the cost for each item and the total cost.
- A list of deletions from the previous year's inventory including the cost of each item, total cost and reason for deletion.
- An inventory balance sheet including totals as follows:
    - Previous years inventory total;
    - Current years deletions total;
    - Current years additions total;
    - Current years inventory total.
- Signed certification that the inventory as presented is true and correct to the best of SHL knowledge.

Equipment costs shall not change once listed on the DNR/SHL joint property inventory. Equipment parts that are added to or removed from existing equipment shall be handled in the following manner:

- Parts that do not fit the definition of equipment used in this agreement shall not be accounted for on the joint property inventory.
- Parts that do fit the definition of equipment used in this agreement shall be tagged and listed individually on the joint inventory.

These provisions do not apply to integral component parts utilized in the repair of equipment and necessary to continued operation of the equipment.

Network Planning Report. SHL shall submit a proposal for additional equipment or staff desired for the next contract by February 15.

Annual Review of Computer Security. SHL shall submit an annual review of its computer security plan to the DNR by August 1. This plan shall indicate the strategy by which SHL shall insure the security of all data gathered under the terms of this contract. This review shall include a review of remote computers and data acquisition systems. The plan will be reviewed and signed by SHL's computer services supervisor.

Existing Vehicles. Twelve vehicles shall be maintained and utilized by SHL for exclusive use by air quality personnel solely for the operation of the ambient air monitoring network.
The DNR will not be responsible for mileage costs for a replacement vehicle(s) except for periods of time when the vehicle being replaced is undergoing repairs or maintenance, or when additional vehicles are needed.
New Vehicles. SHL will purchase two new service vehicles for exclusive use by air quality personnel solely for operating the ambient air network, with funds to be provided by the DNR for this purpose. The vehicles shall be purchased no later than March 15, and, once purchased, shall be included in the equipment inventory.
Vehicles to be Retired. Vehicles taken out of service by SHL shall be disposed of through a state vehicle auction or University of Iowa Motor Pool. Proceeds from the sale of auctioned vehicles shall be returned to the contract funds through a credit on the monthly billing report.

5.1.5 DATA MANAGEMENT

Data Validation. Data obtained from ambient monitors shall be validated as specified in the approved QAPP and in this scope of work.

Data Validation for Continuous Monitors. SHL shall store short term (5 minute) monitoring data for the purpose of validation of all hourly continuous monitoring data. This data may be captured either by daily polling of all monitors, or by on site storage of short term data using data logging software at the site.

Real-time monitoring. SHL shall display hourly real-time monitoring data in graphical formats as well as current and predicted AQI on its web site. SHL shall post data to EPA's ozone and particulate mapping server within twenty-five (25) minutes after the end of each hour. SHL shall establish procedures and assign personnel to ensure that continuous data is being transmitted successfully to the EPA AIRNow website and the SHL real-time website. SHL shall ensure that real-time data are processed and posted to the SHL and AIRNow websites on a timely basis. Communications, download, and upload problems greater than four hours in duration shall be documented and submitted to the DNR in the monthly report, including any corrective actions taken to resolve such problems. Procedures and frequencies for polling and posting data shall be as indicated in SHL's real-time monitoring QAPP/SOP. SHL will upload all non-continuous data to the SHL real-time website on the same schedule that the data is submitted to the AQS database. SHL shall provide charts of FRM versus real time (continuous-derived) concentrations for all continuous PM monitoring sites on its web-site. Upon DNR approval SHL may send preliminary data via email to interested third parties.

Site Setup and Closure in AQS. SHL shall be responsible for opening and closing sites and monitors in the AQS database for its reporting organization, and for its monthly data uploads. SHL shall contact the DNR in order to confirm that new site or monitor setup parameters are accurate before uploading the new parameters to the database. SHL will not close sites or

monitors in the AQS database without approval from the DNR. SHL will inform the DNR via e-mail whenever modifications to the AQS database are made. This notification shall contain a note of explanation of the modifications made and the rationale for the modifications.

AQS/PARS Data Submission. Validated monitoring data (AQS data) and precision and accuracy data (PARS data) for all continuous monitors shall be uploaded by SHL staff to the AQS system by the 15th of the month following the month in which it is collected. Validated monitoring data and precision and accuracy (PARS) data for all gravimetric filter samplers shall be uploaded to AQS within 30 days of the end of the month in which it is collected. Data from samplers requiring laboratory analysis for ions, manganese, metals, and toxics shall be uploaded to the AQS database with a goal of 45 days from the end of the month in which it is collected. Data from samplers requiring laboratory analysis for lead shall be uploaded to the AQS database within 45 days from the end of the month in which it is collected. SHL will inform the DNR via e-mail after completing its monthly data uploads. This report shall include a copy of the final version of the screening file, and copies of the edit and scan checks. In the event that the monthly data upload is not complete, this report shall indicate the reason for the backlog and the anticipated date when the backlogged data will be uploaded.

Data Screening. SHL shall archive an AQS AMP120 to document the data uploaded immediately after each data file is loaded into the system.

Monthly AQS Record keeping Requirements. On a monthly basis, SHL shall:

- run and review the AQS AMP251 and AQS AMP350 monitor reports to determine the completeness and accuracy of the AQS and PARS data uploaded by SHL to the AQS system.

Quarterly AQS Record keeping Requirements. On a quarterly basis, SHL shall:

- run and review the AQS AMP251 report to evaluate the PARS data uploaded by SHL;
- run and review two AQS AMP256 reports, one for the current quarter, and a cumulative AMP256 covering all quarters since the previous data certification;
- run and review the AQS AMP430 report in order to evaluate the quarterly data completeness of the monitors operated by SHL;
- run and review the AQS AMP380 report in order to evaluate the accuracy and completeness of the site setup parameters of the monitors operated by SHL.

5.1.6 REPORTS

Immediate Reports. SHL will notify the DNR immediately with immediate written follow-up upon identification of any exceedance of an ambient air quality standard, emergency episode or potential emergency episode (as defined in 567 IAC 26.2), or exceedance of any other pollutant threshold provided in writing by the DNR.

Weekly Network Status Report. SHL will transmit a written report of the status of air monitoring systems to the DNR Project Manager on the first working day of every week. This report will note any sites or monitors that have been added or removed from the network during the previous week. For each site that is modified or for which data are missed, the report will also include:

- date of last valid data;
- date inoperative condition detected;
- cause of inoperative condition;
- step(s) taken to correct condition;
- expected date data reporting will resume.

Monthly Monitoring Reports. SHL will submit to the DNR Project Manager, a monthly report within fifty (50) days of the end of each month. This report will include a list of fixed station air monitoring sites in operation during the report period, and for each station:

- the number of samples collected or received;
- the number and type of analyses performed;
- the number of exceedances of ambient air quality standards, the number of emergency episodes or potential emergency episodes, and the number of exceedances of pollutant thresholds;
- a listing of all sampling that was omitted by reason of equipment failure, calibration, zero and span checks, sample handling accident, laboratory accident or failure of the operator to collect samples; the type and number of equipment failures; corrective actions taken to mitigate sampling failures;
- a complete listing of the scheduled number of checks and actual completion dates for PARS precision and accuracy checks and calibrations on each monitor or analyzer as well as an explanation and corrective actions taken for calibrations, precision checks, or audits that were not performed on schedule or did not meet acceptance criteria listed in the QAPP and SOP's;
- the percentage of total possible samples which were translated into valid air quality data;
- a listing of all backlogged AQS or PARS data, the reason for the backlog, and the date when the backlogged data will be uploaded to AQS.
- A performance evaluation of the "Smart Heaters" on the BAM 1020 particulate monitor(s).

- A summary of the availability of real-time air monitoring data, including a description of any issues with communication, download or upload of data that causes a delay in reporting data to the SHL or AIRNow websites of greater than four hours, along with a corrective action plan to address these issues.
- Zero air test data for all continuous particulate monitors.

Quarterly Monitoring Report. SHL will submit to the DNR Project Manager, a quarterly report within fifty (50) days of the end of each calendar quarter. This report will include a list of fixed station air monitoring sites in operation during the report period, and for each station:

- the data completeness associated with each monitor; and, in the event the percentages do not meet EPA completeness criteria, an explanation of the reasons for the insufficient data and corrective action plan for the monitor;
- the scheduled number of checks and actual completion dates for PARS precision and accuracy checks and calibrations on each monitor or analyzer as well as an explanation and corrective actions taken for calibrations, precision checks, or audits that were not performed on schedule or did not meet acceptance criteria listed in the QAPP and SOP's;
- the precision and accuracy quarterly rollup for all monitors or analyzers operated during the quarter, calculated as specified in 40 CFR Pt. 58 App. A. SHL Air Quality shall certify that QA has been completed as well as any corrective action plans for analyzers that may be in danger of not meeting Appendix A requirements;
- a listing of all backlogged AQS or PARS data, the reason for the backlog, and the date when the backlogged data will be uploaded to AQS.
- An AMP256 report for the quarter being summarized as well as an AMP256 report for the year through the end of the quarter being summarized. The report will indicate if the number of precision checks and accuracy audits that were done; is at least equal to the minimum required by 40 CFR Pt. 58 App A, the EPA's QA Handbook ("Redbook"), or other agreements between the DNR and SHL (whichever is greater). The Report shall also include a detailed comparison between precision and accuracy results, and the relevant acceptance criteria. In the event that the acceptance criteria are not met, or the cumulative AMP600 suggests they are unlikely to be met for the year, a corrective action plan shall be included.

Inventory Reporting. SHL will supply to the DNR a copy of the complete up to date equipment inventory within seven days of a request by the DNR during the agreement period.

5.1.7 PM10, PM2.5, PM2.5 SPECIATION, METALS, AND TOXICS ACTIVITIES

- Third Party Contractors for lead, PM10, PM2.5 Federal Reference Method, and IMPROVE Visibility Sampler Operations. Where third party filter collectors are used to gather lead, PM10, PM2.5, or visibility filters within the SHL reporting organization, SHL shall perform all operations except for impactor replacement, filter collection, and transmission of sampler performance data to SHL and the national visibility laboratory. SHL's duties include, but are not limited to, the performance of all calibrations, audits, and routine maintenance for all lead, PM10, PM2.5, and visibility monitors within their reporting organization. For new sites where third party operators are to be employed, DNR shall locate qualified third party operators and SHL shall train them to operate samplers in accordance with the SHL's standard operating procedures developed for third party operators. SHL shall manage third party operators to insure that the data generated meets DNR goals for completeness and data quality. SHL shall supply a certified IMPROVE auditor and conduct quarterly audits on IMPROVE samplers.

PM2.5 Speciation Activities. SHL shall perform the following activities in support of the PM2.5 speciation network:

- Field Activities. SHL shall perform all field activities at speciation sites specified in this agreement including canister replacement and filter collection and transmission of sampler performance data to EPA's National Speciation Laboratory. In addition, SHL shall be responsible for the performance of all calibrations, audits, and routine maintenance for all PM2.5 speciation monitors.
- Data validation and AQS maintenance. SHL shall be responsible for setting up or shutting down speciation sites in AQS and shall validate speciated PM2.5 data in cooperation with EPA's National Speciation Laboratory.

Toxics Analysis Laboratory. SHL shall manage and operate the State's air toxics analysis laboratory in support of the State toxics monitoring network. The laboratory shall provide support and analysis for toxic samplers operated by contractors, the Local Programs, or by SHL, as directed by the DNR. The SHL toxics laboratory shall:

- operate all laboratory equipment in accordance with EPA/DNR approved QAPP, SOP's, and manufacturer's operation manuals;
- analyze canister and cartridge samples as well as other appropriate samples as determined by the DNR;
- conduct a method detection limit analysis for toxics at a minimum annual frequency;
- clean and evacuate sampling canisters and maintain an inventory of clean, evacuated canisters sufficient for Iowa toxics monitoring sites;
- provide shipping containers, coolers, thermometers, and ice substitute packs as needed to insure sample handling is conducted in accordance with the QAPP and SOP's;
- maintain an inventory of supplies and consumables sufficient to support toxic monitoring efforts in the State;
- report toxic data analysis results to the DNR with a goal of forty-five (45) days from the end of the month when the samples were collected.
- Enter all non-zero values (even if less than the MDL or IDL) into the AQS database along with appropriate flags and the MDL for each concentration.

Toxics Monitoring Activities. SHL shall perform the following toxic monitoring activities in support of the State toxics monitoring network.

- Field Activities. SHL shall perform all field activities at toxic monitoring sites in the SHL network. These duties include sample collection, calibrations, audits, and routine maintenance for all toxics monitors. These duties shall be performed in accordance with EPA/DNR approved QAPP and SOP's.
- Data validation and AQS maintenance. SHL shall be responsible for setting up or shutting down toxics sites in AQS and shall validate toxics data in accordance with EPA/DNR approved QAPP and SOP's. SHL shall upload toxics data to AQS unless otherwise directed by the DNR.

Ion monitoring and analysis activities.

- SHL shall coat and extract denuders, and perform ion analysis for particulate filters as requested by the DNR during the contract year. Ion sampling and analysis shall be conducted following QAPP's and SOP's approved by the DNR. SHL shall conduct a method detection analysis for ions analyzed on each type of filter substrate at a minimum annual frequency. Enter all non-zero values (even if less than the MDL or IDL) into the AQS database along with appropriate flags and the MDL for each concentration.
- SHL shall provide the results of the ion analysis to the Local Programs in a format that can be directly uploaded to AQS. For ion samples collected by SHL, the associated data shall be loaded to AQS with a goal of forty-five (45) days from the end of the month in which the samples were collected. For samples collected by the Local Programs, the data shall be sent by e-mail to the Local Programs and to the DNR with a goal of forty-five (45) days from the end of the month in which the samples were collected.

Teflon Filter Weighing Laboratory. SHL shall manage and operate the State's Teflon filter weighing laboratory. This laboratory shall provide support for Teflon filter monitors run by contractors, the Local Programs or by SHL, as directed by the DNR. SHL shall:

- operate in accordance with DNR/EPA approved QAPP's and associated SOP's for all Teflon filter weighing laboratory operations;
- order filters and manage the Teflon filter inventory so that sufficient filters are available in order to meet the sampling needs of its customers;
- pre-weigh the filters, load them into clean filter holders, and load the filter holders into clean filter magazines within the laboratory;
- provide shipping containers to mail the filter magazines to the field operators;
- provide coolant and thermometers to ensure that the loaded filters are adequately cooled in transport from the field back to the weighing laboratory;
- equilibrate and weigh the loaded filters, and provide the results of the gravimetric analysis along with all other laboratory data required for upload to the AQS system to its customers in a format that can be directly uploaded to AQS. The data shall be sent by e-mail to all customers and DNR Local Program contacts within 30 days of the end of the month in which the data were collected;
- archive all Teflon filters, as well as filters from portable samplers where directed by the DNR, in refrigerated storage for a minimum of 1 year in accordance with EPA guidance;

Lead/Metals Analysis Laboratory. SHL shall manage and operate the State's air lead/metals analysis laboratory in support of the State monitoring network. The laboratory shall provide support and analysis for lead/metals samplers operated by contractors, the Local Programs, or by SHL, as directed by the DNR. The SHL lead and metals laboratory shall:

- operate all laboratory equipment in accordance with EPA/DNR approved QAPP, SOP's, and manufacturer's operation manuals;
- conduct a method detection limit determination for metals for each analyte on each filter substrate at a minimum annual frequency;
- analyze filter samples as determined by the DNR;
- provide shipping containers, coolers, thermometers, and ice substitute packs as needed to insure sample handling is conducted in accordance with the QAPP and SOP's;
- maintain an inventory of supplies and consumables sufficient to support lead and metals monitoring efforts in the State;
- report metals data analysis results to the DNR and upload to the AQS database with a goal of forty-five (45) days from the end of the month in which the samples were collected.
- report lead data analysis results to the DNR and upload to the AQS database within forty-five (45) days from the end of the month in which the samples were collected.
- Enter all non-zero values (even if less than the MDL or IDL) into the AQS database along with appropriate flags and the MDL for each concentration.

5.1.8 TECHNICAL ASSISTANCE

Technical Assistance to the Local Programs. SHL shall provide technical assistance to the Local Programs in cooperation with the DNR in matters related to the operation of the local monitoring networks.

5.1.9 SPECIAL PROJECTS

SHL shall complete the following special projects:

New Monitoring Sites. SHL shall install new monitoring sites and discontinue sites/monitors as indicated below and in Appendix C.
New Ozone Monitor. SHL shall evaluate a 2B Technologies ozone analyzer. The evaluation report will be due December 1, 2014.
New Federal Reference Method for Lead. Implementation of the new Federal Reference Method for lead analysis (ICP-MS) using a heated ultrasonic bath with nitric acid (HNO_3) and hydrochloric acid (HCl) or a heated block (hot block) digester with HNO_3 for filter extraction on January 1. Draft SOP's for the new method shall be sent to DNR by November 1, and final SOP's shall be sent to DNR by December 1.
BAM 1020 Sampler Training. SHL shall host training for BAM-1020 monitors for SHL, DNR, and the Local Programs by June 1.
API Teledyne T300U CO Monitor Training. SHL shall host training for the API Teledyne T300U CO monitor for SHL, DNR, and the Local Programs by June 1.
New Sampling Shelter. SHL shall install and operate the Shelter One monitoring instrument shelter at Lake Sugema by August 1.
Numerical real-time data on SHL website. SHL shall evaluate options to provide the display of numerical hourly concentration data for all monitors where graphical concentration data is displayed on the SHL website by January 1.
PM2.5 Audit Sampling. SHL shall operate a PM2.5 audit sampler at locations selected by the DNR during the contract period.
Survey Sampling/Public Outreach. SHL will conduct survey sampling or investigate the feasibility of survey sampling on behalf of the DNR.

- If the survey involves equipment and analytical methods in use in the current air monitoring network, then the sampling results will be analyzed following the time frames and pricing schedules established in the contract for routine samples. SHL will initiate sampling within thirty (30) days of a request by the DNR and issue a final public report within (30) days after conclusion of analysis. The final report will contain a description of the monitoring location, a comparison of the site location to any applicable federal siting criteria, the sampling data, a comparison of the data to health standards established for routine sampling.
- If the survey involves equipment or analytical methods not in use in the current air monitoring network. SHL will develop criteria for siting survey or passive samplers, calibration and operation of sampling equipment, analytical methods used to develop samples, and data reduction and analysis techniques. In addition, within thirty (30) days of a request of the DNR, SHL shall distribute available portable or passive samplers to members of the public and train them in the operation of these samplers. SHL or other DNR approved laboratory shall be responsible for analyzing the results of these sampler runs, and submitting a report to the sample operator and to the DNR in a mutually agreed upon timeframe.

Backup Continuous Monitors. Within thirty (30) days of a request by the DNR, SHL shall install and operate backup continuous samplers in the SHL network. Precision checks, audits, and calibrations shall be performed on the backup monitors in the same manner as for the primary monitor.
Digital Data Capture. SHL shall configure continuous monitors for digital data capture at monitoring locations where it is practical and feasible

5.1.10 SUPPLEMENTAL ANALYTICAL SERVICES

- Toxics analysis. Toxics analysis costs for the contract period shall be $300 per TO-15* analysis and $175.50 per TO-11A analysis.
- Ion analysis. Ion analysis costs for the contract period shall be $24 per sample for sulfate or nitrate analysis, $37.50 per sample for both sulfate and nitrate analysis.
- Asbestos analysis. Asbestos analysis costs for the contract period shall be $38 per sample.
- Lead or manganese analysis*(GFAA). Lead or manganese analysis costs for the contract period shall be $13.50 per metal analyzed and $10.50 per digestion required.
- Metals analysis (ICP-MS). Metals analysis costs for the contract period shall be $13.50 per metal analyzed plus $10.50 per digestion required.

*The DNR has purchased the analytical equipment.

5.1.11 ASBESTOS NESHAP PROGRAM

Asbestos Samples Submitted by the DNR. SHL will analyze all samples submitted by departmental DNR staff as described in the second paragraph of this section. Sample containers for sample transport will be provided by SHL. The results of the tests will be forwarded to the Air Quality Section within fifteen (15) calendar days of receipt. Extra time for analysis is allowed in cases when the analytical work warrants. A notification to the submitter, stating that analytical results from a sample will be delayed and the reason for the delay will be made within fifteen (15) calendar days of receipt of the sample if extra time is required for analysis.

Asbestos Sample Analysis. SHL shall analyze samples for asbestos submitted by DNR staff. Unless otherwise directed, the analysis will use the published polarized light microscopy method from 40 CFR Part 763 Appendix A to Subpart F. These samples will be collected during NESHAP compliance evaluation inspections of asbestos abatement contractor work. Samples collected for this activity will be coded as AQ-AB.

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM **16** **DECISION**

TOPIC **2015 Contract with Linn County Air Quality Division: Air Pollution Control in Linn County**

Recommendations:
Commission approval is requested for a one year-service contract with the county government of Linn County; Cedar Rapids, Iowa. The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $850,094. This contract is an Iowa Code Chapter 28E contract.

Funding Source:
The statutory authority for the DNR to enter into this contract is 455B.145. This contract will be funded by cost reimbursable payments from Title V program fees (not to exceed $705,942), 105 federal grant dollars (not to exceed $126,652), and 103 federal grant dollars (not to exceed $17,500). Linn County has a funding commitment of $221,165.

Background:
Under Iowa Code § 455B.134 (11) and Iowa Code § 455B.144 local political subdivisions are able to address air quality problems in their jurisdictions and can establish their own rules. Linn County had a local program, including ordinances and enforcement, in place prior to the DNR's delegation from EPA for an air program.

As specified in Iowa Code § 455B.145 and 567 Iowa Administrative Code (IAC) Chapter 27, the Linn County Air Quality Division meets the conditions necessary to retain a local program. As established under the requirements of this contract, the Linn County Air Quality Division is responsible for the ongoing implementation of an air program within their county.

Purpose:
The parties propose to enter into this contract to specify the extent and manner of cooperation between the two agencies in conducting programs for the abatement, control, and prevention of air pollution within Linn County. Particular emphasis is placed on the collection and assessment of information regarding air quality, the permitting of sources of air emissions, the enforcement of emission limits, and the attainment and maintenance of ambient air quality standards.

Contractor Selection Process:
The DNR is allowed to contract with Linn County without using a competitive selection process pursuant to state law.

Contract History:
Records indicate that DNR has been contracting with Linn County for implementation of an air program within Linn County since at least 1992. The contract is renegotiated annually with Linn County to provide services that allow for the ongoing implementation of an air program.

In comparison to last year (SFY 2014), the contract currently being requested for approval has the same scope of work. The DNR's budget contribution increased by $13,207 (Title V program fees) and Linn County's funding commitment increased by about 3.5% ($7,430). Budget increases were due primarily to personnel, fringe benefit & indirect costs.

Christina Iiams
Program Planner 2
Air Quality Bureau – Environmental Services Division
June 17, 2014

Attachment(s): Special Conditions for Contract 14ESDAQBCIiam-0001

SPECIAL CONDITIONS

Section 5 STATEMENT OF WORK – RESPONSIBILITIES OF THE PARTIES

5.1 The responsibilities of the Local Program shall be to perform the following tasks. Projects or activities not in accordance with Section 5.1 shall not be conducted with the resources provided for in this Contract unless written approval is granted by the DNR in advance. The Local Program shall complete its obligations under this Contract by the Task Milestone Dates set out in Section 5.1.6.

5.1.1 Program Management Provisions

5.1.1.1 Personnel

1. Personnel commitment. The Local Program represents that it has or will acquire all personnel required for the performance of the work specified under this Contract and 567 IAC 27.4(1) "c". Staffing requirements are specified in Table 1 below.

Table 1: Staffing Requirements

Position	FTE
Environmental Public Health Manager	0.36
Air Quality Branch Supervisor	1.00
Senior Air Permitting Engineer	1.00
Senior Air Quality Scientist	2.00
Air Quality Specialist	1.00
Ambient Air Monitoring Supervisor	0.55
Ambient Air Monitoring QA/QC Specialist	1.00
Ambient Air Monitoring Specialist	2.10
Air Quality Administrative Support Staff	0.50
TOTAL	**9.51**

Knowledge, skills, and ability requirements for Local Program staff are as identified below.

a) Visible emissions observers. The Local Program shall have at least two (2) staff members certified in visible emission observation as specified in 567 IAC Chapter 29.

b) Dispersion modeling personnel. The Local Program shall have at least one (1) staff member trained in conducting air dispersion modeling. Personnel with modeling responsibilities shall demonstrate during DNR audits and in construction permit review documentation, an adequate knowledge of:

1) Current EPA and DNR procedures, policies, and guidance related to dispersion modeling;

2) Techniques and methods used to perform or review air dispersion modeling analyses;

3) Air dispersion model output data and its use in determining compliance with the applicable ambient air quality standards; and

4) Strategies and/or control measures necessary to mitigate modeled exceedances of the applicable air quality standards.

c) Inspection personnel. Inspection personnel shall:

1) Maintain state visible observation certification;

2) Demonstrate an adequate understanding of the principles, practices, laws, procedures and control methods during joint inspections and through inspection documentation; and

3) Demonstrate an adequate understanding of the principles of and methods employed in:

a) Stack testing for the purpose of observing stack tests, and

b) Continuous emission monitoring for the purpose of monitor certification.

d) Monitoring personnel. Monitoring personnel shall demonstrate, during EPA and DNR audits and in monitoring program documentation, an adequate knowledge of and ability to perform:

1) Monitoring operations;

2) Quality control and quality assurance methods; and

3) Standard operating procedures.

e) Permit review personnel. Permit review personnel shall:

1) Demonstrate an adequate understanding of the principals, practices, laws, procedures and control methods applicable to the determination of permit completeness, review of permit applications and the issuance of permits, particularly as they apply to the determination of:

a) Applicability of Prevention of Significant Deterioration (PSD) major source and "synthetic minor" review;

b) Applicability of New Source Performance Standards (NSPS);

c) Applicability of Title V (Operating Permits); and

d) Applicability of Title I and section 112.

2) Demonstrate an understanding of stack testing methods and application, and the review of stack test results.

2. Personnel Qualification. All of the work and services required hereunder shall be performed by the Local Program and all personnel engaged in the work shall be fully qualified and shall be authorized under state and local law to perform such services.

3. Key Personnel. The following individuals are designated as key personnel:

a) James Hodina (Environmental Public Health Manager)

b) Shane Dodge (Air Quality Branch Supervisor)

c) Kyle Lundberg (Air Monitoring Supervisor)

d) Carole Lamphier (Air Monitoring QA Officer)

Individuals specified as "Key Personnel" are considered essential to the work and services to be performed. If for any reason substitution for a specified individual becomes necessary, the Local Program shall, by the next business day, provide written notification of such to the DNR. The Local Program shall provide the name and qualifications of the replacement individual.

4. Training. All permit writing, enforcement, and ambient monitoring personnel shall maintain familiarity with applicable air quality permitting, inspection, and monitoring procedures, techniques, and technologies by routinely attending pertinent EPA, DNR, or other public or private training classes (or similar training). Attendance at Air and Waste Management Association (AWMA) and National Association of Clean Air Agencies (NACAA) conferences is encouraged. The Local Program shall submit to DNR a training plan for all permit writing, enforcement, and ambient monitoring staff. The training plan shall be submitted on an annual basis (as per Section5.1.6), for DNR review and recommendation.

5. Personnel report. The Local Program shall submit a semi-annual report, per Section 6.3.4 of this Contract, containing the following information:

a) A summary, for each staff member working under this Contract, of how staff time was utilized, in full-time equivalent (FTEs) percentages, for the following program activities:

1) Minor Source Construction/Local Operating Permitting;

2) Major Source Construction Permitting;

3) PSD Permitting;

4) Title V Operating Permitting;

5) Program Development;

6) Ambient Air Monitoring Supervision;

7) Ambient Air Monitoring Quality Assurance;

8) Ambient Air Monitoring Field Operations;

9) Minor Source Compliance/Inspections;

10) Major Source Compliance/Inspections;

11) Training/Conferences;

12) Administration & Management;

Totals shall be provided for each category and;

b) Minor source, major source, and PSD permitting shall identify the portion of permitting time utilized for performing air dispersion modeling;

c) A training summary to include dates, training provider/sponsor, location, and names of staff who attended; and

d) A brief, written summary of air quality work activities completed or in progress by the Environmental Public Health Manger.

6. Personnel Changes. The Local Program may make personnel changes, which include but are not limited to promotions, transfers, and terminations, during this Contract, provided the total FTE requirements indicated in Table 1 are maintained and the provisions of Section 5.1.1.1/3 regarding key personnel are followed. The Local Program shall submit, no later than ten (10) working days from the effective date of a personnel change, a report containing the following information:

a) The changes in personnel, including staff name, position before/after the changes, personnel and benefit amounts, and effective date of the changes; and

b) Identification of work products and program activities being affected by the change and how and when the work products will be completed.

7. New Personnel. For new hires, the Local Program shall submit, no later than ten (10) working days from the start date of the new hire, a report containing the following information:

a) The new staff member's name, position, and personnel and benefit amounts,

b) A new employee background summary, including name of the employee and a description of their education and experience; and

c) A special training schedule to be used for training the new employee.

8. Personnel plan. By January 15, 2015, the Local Program shall submit to DNR a staffing plan for the period of July 1, 2015 through June 30, 2016. This plan should document current utilization of staff time, as categorized above, and propose and explain any changes to the current utilization.

5.1.1.2 Fiscal Reporting

1. Budget. By January 15, 2015, the Local Program shall submit to the DNR proposed salary and non-salary itemized budgets for the period of July 1, 2015 through June 30, 2016. If requested by the DNR, the Local Program shall include a written justification for the proposed budget items. The Local Program may use the current Contract's responsibilities and shall use line items, as provided in Section 5.1.1.2/2, to assist in establishing the draft budget. Any new responsibilities or requests should be shown separately in the budget as a decision package.

2. Expenditure Reports. The Local Program shall report expenditures of State Grant funds and the Local match quarterly, per Section 7.5 of this Contract. This shall be itemized based on the following minimum line items. The Local Program may incorporate additional sub items as are reflected in their actual accounting practices with written approval by the DNR.

Expenditure Category	STATE CONTRIBUTION NOT TO EXCEED	105 FG NOT TO EXCEED	Title V NOT TO EXCEED	103FG NOT TO EXCEED	OVERALL TOTAL (including LP Match)
Personnel (1)	**739,658**	**103,628**	**618,530**	**17,500**	**935,927**
Travel/Training (2)	**8,674**	**1,735**	**6,939**	**0**	**10,842**
Meeting Expense	3,754	751	3,003	0	4,692
Training Expense	4,920	984	3,936	0	6,150
Supplies (Total) (3)	**11,412**	**2,612**	**8,800**	**0**	**13,750**
Vehicle Operation & Maintenance	7,262	1,662	5,600	0	8,750
Office Supplies & Equipment	4,150	950	3,200	0	5,000
Other (Total) (4)	**18,764**	**2,963**	**15,801**	**0**	**24,690**
Lease/Maintenance Agreement	7,828	1,236	6,592	0	10,300
Utilities (phone, electric)	2,812	444	2,368	0	3,700
Postage, Printing, Reproductions	1,520	240	1,280	0	2,000
Community Outreach/Reporting	760	120	640	0	1,000
Computing (Website, Software)	5,844	923	4,921	0	7,690
Monitoring Expenses (Total) (5)	**71,586**	**15,714**	**55,872**	**0**	**86,500**
Engineering & Scientific Equipment	24,828	5,450	19,378	0	30,000
Repair & Maintenance of Equipment	24,331	5,341	18,990	0	29,400
Power & Data Transfer Expense	15,724	3,452	12,272	0	19,000
Telephone & Telegraph	9,100	2,000	7,100	0	11,000
Electric Light & Power	6,624	1,452	5,172	0	8,000
Lab Supplies	6,703	1,471	5,232	0	8,100
Total	**850,094**	**126,652**	**705,942**	**17,500**	**1,071,709**

3. The Local Program shall verify with the Linn County department accounting clerk that expenditure reports have been submitted as specified in Section 7.5 of this Contract.

5.1.1.3 Initial Contract Review

By March 15, 2015, the Local Program shall submit to DNR comments and changes proposed to the draft Contract for the period of July 1, 2015 through June 30, 2016, to include any deletions, revisions, and additions. Justification shall be provided for any change in the draft Contract.

5.1.1.4 Final Contract Review

By April 30, 2015, the Local Program shall submit to DNR any comments of the final draft Contract.

5.1.1.5 Information Technology

1. Web Site. The Local Program shall continue to develop and maintain a website to disseminate information regarding the air program. The Local Program website shall be reviewed, at a minimum, on a quarterly basis and updated as needed, or as directed by DNR.

a) Updates that are beyond normal maintenance or upkeep of deficiencies shall be reviewed by the DNR prior to establishing a "release of work".

2. The Local Program shall ensure that its website includes real-time ambient air monitoring data within the requirements established in Section 5.1.5.4/6.

3. The Local Program may contract with a third party, Informatics, for the sole purpose of upgrading the Linn County Air Quality Section website. The Local Program shall:

a) Within seven (7) business days, provide the DNR with a copy of the signed "Release of Work" entered into between the Local Program and Informatics for work to be completed during July 1, 2014 through June 30, 2015.

b) For projects requiring a "release of work", the Local Program shall submit, in accordance with the schedule identified in Section 6.3.2, quarterly reports to the DNR Project Manager. The following shall be included in the quarterly report:

1) Activities completed to meet the deliverables identified above;

2) A description of any obstacles that would delay timely completion of each respective work item; and

3) The number of hours used by the subcontractor to complete each deliverable.

4. Web site Planning. By January 15, 2015, the Local Program shall submit to the DNR a proposed website plan for the period of July 1, 2015 through June 30, 2016. The plan shall include:

a) Identification of the Local Program's current website deficiencies or problems;

b) A description of how the Local Program will address the deficiencies or problems, including all deficiencies or problems as identified in writing by the DNR;

c) A process for continual maintenance of the website during the period of July 1, 2015 through June 30, 2016; and

d) A budget proposal for SFY 2016.

5.1.1.6 Legal Authority

1. Enforcement. The Local Program is authorized to enforce Chapter 10 of the Linn County rules within Linn County. The Local Program is further authorized to fulfill its responsibilities under the Clean Air Act and Iowa Code chapter 455B.

2. Linn County Rules. The Local Program shall update Chapter 10 of the Linn County Code of Ordinance to be no less stringent than federal and state statutes and rules, including NSPS and NESHAP regulations. The Local Program shall provide:

a) A thirty-day public comment period and public hearing, as required by 40 CFR 51.102, to allow for federal approval of the rule amendments. The thirty-day comment period must occur prior to any final action by the Linn County Board of Supervisors taken pursuant to the provisions of Iowa Code section 331.305;

b) Public notice by publishing the notice in a local newspaper;

c) The DNR, prior to final action by the Linn County Board of Supervisors, a compilation of public comments and the County's response to all comments to any interested party; and

d) The DNR and EPA Region VII with a copy of the rule amendments prior to the conclusion of the comment period.

3. The Local Program shall initiate, at a minimum, one revision/update to Chapter 10 of the Linn County Code of Ordinance no later than June 1, 2015, to ensure the Linn County Code of Ordinance is no less stringent than federal and state statutes and rules, including NSPS and NESHAP regulations. "Initiate" shall be defined in this article as having submitted to DNR and EPA a final proposed rule for review and comment.

5.1.1.7 Minority and Women Business Enterprise (MBE/WBE)

The Local Program shall submit a quarterly MBE/WBE report to DNR, per Section 5.1.6 of this Contract, on Standard Form 5700-52A. For instances where there is no information to submit, the Local Program shall correspond via electronic media to the DNR Project Manager that there are no items to report.

5.1.1.8 Intergovernmental Cooperation

1. EPA grants. The Local Program shall submit such information as DNR may require for demonstration of compliance with EPA grant output requirements.

2. Semi-Annual Meetings. Commencing with beginning performance of this Contract, the Local Program and DNR shall meet semi-annually to discuss:

a) Progress toward the development and implementation of a comprehensive state-wide air quality program, and national and state air quality priorities and issues; and

b) Progress made by the Local Program during the performance of this Contract.

As agreed upon by the parties, additional meetings may occur. Representatives of each agency shall be present. The meetings shall occur, either in person or by telephone conference call. Meetings may be postponed only on a case-by-case basis by mutual written agreement of the parties.

3. SIP assistance. The Local Program shall also provide, within Local Program budget, legal and jurisdictional limitations, such other assistance as DNR may request in order to implement the State of Iowa Air Pollution Implementation Plan (SIP).

5.1.2 Construction Permitting Provisions

5.1.2.1 Source review

The Local Program shall review all proposed new emission units and modifications to existing sources of air pollution.

5.1.2.2 Permit issuance

Local Program issuance of construction and operating permits for all new or altered equipment capable of emitting air contaminants into the atmosphere shall neither:

1. Result in a violation of applicable portions of the control strategy (as provided in 40 CFR Part 52, Subpart Q), nor

2. Interfere with the attainment or maintenance of a national ambient air quality standard (NAAQS) (determined by application of appropriate EPA Guideline air quality model or equivalent review).

5.1.2.3 Permit/Modeling Procedures

1. The Local Program shall utilize the procedures described in the latest version of the DNR Construction Permit Manual, on-line DNR PSD guidance documents, check-sheets, templates, forms (or approved equivalents), and EPA Guidelines. The Local Program shall, at a minimum, utilize the procedures and guidance described in the latest version of the DNR's "Air Dispersion Modeling Guidelines for Non-PSD, Pre-Construction Permit Applications", "Air Dispersion Modeling Checklist for Non-PSD Construction Permit Applications", and the "Air Dispersion Modeling Guidelines for PSD Projects".

2. Modeling Meetings. If requested by the Local Program and/or the DNR, the two parties shall meet to discuss modeling issues. The Local Program technical staff involved in ambient air modeling shall be present. This meeting will focus on DNR modeling guidance, procedures/checklists and their application, and specific questions related to conducting and review of dispersion modeling.

5.1.2.4 Permit transfer

1. The DNR pre-approved classes of sources based on the agreement of permit content for that class of source. This pre-approval includes tanks, generators, paint booths at minor sources, and modifications for administrative corrections and changes in stack characteristics. Such approval shall remain in effect until such time as the permit content changes.

2. The Local Program shall transfer directly for DNR review, any construction permit applications for projects that triggers review under the provisions of Section 112(g) of the Clean Air Act.

5.1.2.5 Permit content

Draft construction permits submitted pursuant to Section 5.1.2.4 shall include:

1. Potential to emit calculations;

2. A statement specifying the Local Program determination of the applicable regulation(s) for permit issuance;

3. Documentation of any measures used to avoid major Prevention of Significant Deterioration (PSD) source review;

4. Predicted actual emission calculations; and

5. Language in accordance with requirements set out in 567 IAC 22.3 (3); which are the conditions of approval.

5.1.2.6 Data Management

1. The Local Program shall submit to the DNR, via electronic media, quarterly Excel reports containing construction permitting information and updates. These reports shall include the following information:

a) Source name;

b) Source location;

c) AFS ID number;

d) Emission unit description;

e) Emission point identification;

f) Date application received;

g) Date permit issued;

h) Major pollutants emitted;

i) Type of permit issued (i.e. new, modification, as-built, synthetic minor, PSD); and

j) Primary standard industrial classification codes.

If desired, the Local Program may also update the Air Facility System (AFS) with construction permitting information in addition to the excel spreadsheet identified above.

5.1.2.7 PSD Permit Activities

1. Permit review. The Local Program shall review all permit applications and associated modeling analyses for PSD Permits submitted for facilities located within Linn County.

2. Permit application processing and draft permit content. The Local Program shall process the permit applications and prepare draft permits following the rules specified in 567 IAC Chapters 22 and 33.

3. **Final Permit Issuance.** The Local Program shall provide the final PSD permit(s) for issuance within 180 days of receiving the final application, plus the time necessary for DNR review of the draft permits. The Local Program shall use the pre-application meeting protocol (see Section 5.1.2.8) in order to expedite the final permit issuance.

5.1.2.8 Pre-application Requirements

1. The Local Program shall utilize the on-line DNR pre-application PSD meeting protocol; this is found at: http://www.iowadnr.gov/portals/idnr/uploads/air/insidednr/conpermit/pre_app.pdf

2. A pre-application meeting for PSD projects shall be conducted prior to a PSD permit application being reviewed. The pre-application meeting shall occur at a location within Linn County mutually agreed to by the applicant and the Local Program.

a) In order for the pre-application meeting to take place, an 80% complete application shall be submitted by the company to the Local Program a minimum of two (2) weeks prior to the meeting date.

b) The Local Program shall submit no later than ten (10) business days prior to the pre-application meeting a copy of the 80% complete application to the DNR and to EPA Region VII staff respectively.

c) If a pre-application meeting is held, the Local Program shall provide DNR and EPA Region VII staff the opportunity to be present at each pre-application meeting.

5.1.2.9 PSD Permit Application Review

1. Permit application completeness. The Local Program shall use DNR's written and on-line guidance documents and checklists for determining application completeness.

2. Permit application. The Local Program shall process permit applications in accordance with requirements set out in 567 IAC Chapters 22 and 33 and as specified in this Contract. If, while processing an application that has been determined to be complete, the Local Program determines that additional information is necessary to evaluate the application, the Local Program shall request from the source, in writing, such information and set a reasonable deadline for a response.

3. Decision to deny a permit application. If the Local Program judges that a permit application should be denied, the Local Program shall notify DNR as soon as possible. The notification to DNR shall include a summary of the basis of the decision and a copy of all information relevant to the decision including a chronology of any requests for additional information and other relevant correspondence with the source.

5.1.2.10 PSD Permit Content

The Local Program shall prepare draft permits using the DNR permit template in accordance with 567 IAC Chapters 22 and 33 such that all permit conditions are enforceable as a practical matter. Prepared permits shall include, but are not limited to, the items listed below.

1. Enforceable emission limitations and standards. Each draft permit shall include emissions limitations and standards, including those operational requirements and limitations that ensure compliance with all applicable requirements at the time of permit issuance as defined in 567 IAC Chapter 22.

2. Monitoring. Each draft permit shall contain the requirements with respect to applicable monitoring. Each draft permit shall include reporting requirements no less stringent than those required in the applicable emission or operating limit and necessary to make those conditions enforceable as a practical matter.

3. Record keeping. Each draft permit shall include record keeping requirements no less stringent than those required in the applicable emission or operating limit and necessary to make those conditions enforceable as a practical matter.

4. Reporting. Each draft permit shall contain the requirements with respect to reporting where applicable. Each draft permit shall include reporting requirements no less stringent than those required in the applicable emission or operating limit and necessary to make those conditions enforceable as a practical matter.

5. Operating Scenarios. Terms and conditions for reasonably anticipated operating scenarios identified by the source in its application and which are approved by the Local Program shall be incorporated into the draft permit.

5.1.2.11 Preparation of a draft PSD permit and fact sheet

The Local Program shall prepare a draft permit and a fact sheet using the DNR template. The Local Program shall provide the fact sheet to any other person who requests it. The fact sheet shall include, but is not limited to:

1. The rationale for issuance of the permit;

2. A brief description of the type of facility;

3. A summary of the type, quantity, ambient impact, increment consumption, and BACT decisions of air pollutants being emitted;

4. A brief summary of the legal and factual basis for the draft permit conditions, including references to applicable statutes and rules;

5. A description of the procedures for reaching final decision on the draft permit including the comment period, the address where comments will be received, and procedures for requesting a hearing and the nature of the hearing; and

6. The name, email address and telephone number for a person to contact for additional information.

5.1.2.12 PSD Permit Review by DNR

Prior to beginning the public comment period, unless otherwise requested by the DNR, the Local Program shall convey to DNR via electronic media the following for all draft permits:

1. A copy of the draft permit on DNR's construction permit template and fact sheet in *Microsoft Word*.

2. All correspondence (in *Microsoft Word*) generated by the Local Program with regard to the permit, including but not limited to:

a) Completeness review and results,

b) Engineer evaluations,

c) Application package,

d) Requests made by the Local Program for additional information and the response, and

e) Any additional information.

3. All modeling related analyses and documentation, including but not limited to:

a) Local Program modeling report(s);

b) Modeling protocol**;**

c) All modeling files generated by the applicant and the Local Program, including input, output, downwash, growth, soil and vegetation, and visibility files; and

d) Any additional modeling information.

5.1.2.13 Facility Review of PSD permit

After the draft permit has been reviewed by DNR, and any objection(s) has/have been resolved, the Local Program shall provide a draft permit to the facility for review. The draft permit shall be provided to the facility prior to the commencement of the public comment period.

5.1.2.14 PSD Permit review by EPA

Unless otherwise approved by the DNR, the Local Program shall provide EPA with a copy of the public comment materials a minimum of ten (10) days prior to the beginning of the public comment period.

5.1.2.15 Public notice and public participation

1. Public notice. The Local Program shall provide public notice and an opportunity for public comments, including an opportunity for a hearing, before issuance, denial or renewal of a permit; or significant modification or revocation or re-issuance of a permit.

2. Website. The final draft permit and fact sheet shall be prepared and made available on both the Local Program and DNR websites prior to the beginning of the comment period. Availability of the final draft permit and fact sheet on the Local Program website may be through a link to the DNR website.

3. Mailing list. The Local Program shall provide notice to the persons/entities listed in 567 IAC 33.3(17). The Local Program shall include DNR and EPA Region VII on the mailing list.

4. Publication and availability of notice. Notice shall be given by publication in a newspaper of general circulation in the area where the source is located or in a state publication designed to give general public notice. Notice also shall be given to persons on a mailing list developed by the Local Program, including those who request in writing to be on the list. The Local Program may use additional means if necessary to ensure adequate notice to the affected public. The public notic0e shall include the following:

a) Identification of the source;

b) Name and address of the permittee;

c) Name and address of the permitting authority processing the permit;
d) The activity or activities involved in the permit action;
e) The emissions change involved in any permit modification;
f) The air pollutants or contaminants to be emitted;
g) Notice of the degree of increment consumption that is expected from the source or modification;
h) The time and place of any possible public hearing;
i) A statement that any person may submit written and signed comments, or may request a public hearing, or both, on the proposed permit. A statement of procedures to request a public hearing shall be included;
j) The name, address, and telephone number of a person from whom additional information may be obtained; and
k) Locations (including any website addresses) where copies of the permit application and the proposed permit may be reviewed and the times at which they shall be available for public inspection.

5. Public comment period. The Local Program shall provide for a public comment period as required under CFR Title 40 §124.10.

6. Public hearing. Any person may request a public hearing. The Local Program shall hold a public hearing (following the requirements under CFR Title 40 §124.10(b) (2) upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. A public hearing may also be held at the Local Program's or the DNR's discretion.

7. Response to comments. The Local Program shall keep a record of the comments and of the issue(s) raised during the public participation process and shall prepare written responses to all comments received. The Local Program shall revise the draft permit in response to comments made during the comment period if the Local Program or the DNR determines that modifications to the draft permit are warranted. The Local Program shall not make the written responses or subsequent changes to the draft permit public until the time that the DNR makes a final decision on the permit. The record of persons commenting, issues raised and the written responses shall be conveyed to the DNR and EPA with the final permits. A copy of the responses to comments shall be sent to all parties that request the document and placed at the same location as the public documents for a period of thirty (30) days.

5.1.2.16 Final PSD Permit Issuance

1. Changes to the draft permit. Prior to drafting the final permit the Local Program shall incorporate those changes, as it deems appropriate into the proposed permit.

2. Conveyance of proposed permit to DNR. The Local Program shall convey to DNR via electronic media the following for all final permits:
a) A copy of the final draft permits in *Microsoft Word*;
b) Rationale for any changes made to the draft permit; and
c) All correspondence related to the changes.

3. Re-notification of Permit. Once the Local Program has submitted the final permit and all corresponding information to the DNR, the DNR will determine if the changes require the permit to be re-noticed in accordance with Section 5.1.2.14.

4. BACT Data. Within thirty (30) days of the Local Program being informed by the DNR that a final permit has been issued, the Local Program will enter BACT information into the RACT, BACT, LAER Clearinghouse (RBLC).

5.1.2.17 PSD permit modifications

The Local Program shall modify PSD permits using the same procedural requirements that apply to initial permit issuance, including those for public participation and review by EPA.

5.1.2.18 Intergovernmental Cooperation

1. In order to ensure uniform implementation of PSD application procedures the Local Program shall:
a) Use the application forms, templates, and procedures (identified in Section 5.1.2.3) employed by DNR; and
b) Participate in the development of public workshops and other educational projects as requested.

2. Transfer of Duties. The Local Program may request on a case by case basis that the DNR process a PSD application, as described throughout Section II, for a designated facility. The DNR will either deny or accept this request within fifteen (15) days of the request submittal. Upon acceptance of this request, the DNR shall become the responsible party for the PSD application and the Local Program shall no longer participate in processing the identified PSD application.

5.1.3 Title V Permitting Provisions

5.1.3.1 Title V Permit Activities

1. Permit review. Upon receipt or notification by the DNR, the Local Program shall review all permit applications for Title V Operating Permits submitted for facilities located within Linn County. .

2. Permit application processing and draft permit content. The Local Program shall process the permit applications and prepare draft permits following the guidelines specified in 567 IAC 22.107, 22.108, and 22.110-116, including all of the elements specified in Section 5.1.3 of this Contract. The Local Program shall use the DNR's review manual and review check sheet as an aide in the process of drafting permits.

5.1.3.2 Permit Application Review

1. Permit application completeness.

a) The Local Program shall develop and maintain a protocol for determining application completeness. This protocol shall be employed in the review of all permit applications for operating permitting.

b) The Local Program shall, within 60 days of application receipt or notification by the DNR, make a completeness determination on the application and issue to the applicant a notice of whether the application is complete.

2. Permit application. The Local Program shall process permit applications in accordance with requirements set out in 567 IAC 22.107 and as specified in this Contract.

a) Prioritization of review. The Local Program shall review the permit applications in accordance with the priority schedule established in 567 IAC 22.107(1)"c."

b) If, while processing an application that has been determined to be complete, the Local Program determines that additional information is necessary to evaluate the application, the Local Program shall request from the source, in writing, such information and set a reasonable deadline for a response.

3. Decision to deny a permit application. If the Local Program judges that a permit application should be denied, the Local Program shall notify DNR as soon as possible. The notification to DNR shall include a summary of the basis of the decision and a copy of all information relevant to the decision including a chronology of any requests for additional information and other relevant correspondence with the source.

4. Performance expectation. The Local Program shall draft for issuance or denial a minimum of four (4) initial or renewal Title V Operating Permits, or Title V Operating Permits, annually. Consistent with the allocation of effort for this activity (1 FTE), deviation from this minimum performance expectation in order to address priority DNR projects may be negotiated with the agreement of both parties.

a) Schedule. No later than May 15, 2015, the Local Program shall submit to the DNR, via electronic media, a proposed schedule that identifies what Title V Operating Permits the Local Program intends to issue during the period of July 1, 2015 through June 30, 2016. The schedule shall include, but is not limited to:

1) Facility Name;
2) Title V Permit Number;
3) Type of Permit (renewal or initial);
4) EIQ number;
5) DNR Facility number;
6) AIRS number; and
7) Months since Issued Date.

Any changes to the proposed schedule shall be submitted to the DNR within thirty (30) days of revision.

b) Quarterly Status Report. In accordance with Section 5.1.6 of this Contract, the Local Program shall submit to the DNR a quarterly status report of Title V Operating Permits being drafted for issuance by the Local Program for the period of July 1, 2014 through June 30, 2015. The status report shall include, but is not limited to:

1) Facility Name;
2) Title V Permit Number;
3) Type of Permit (renewal or initial);
4) EIQ number;
5) Name of Staff Member working on the permit;
6) Stage of Review (may include, but not limited to: facility follow-up/information gathering, facility review, DNR review, public notice; or submitted to DNR for issuance) and date to be completed;
7) Identification of any problems/obstacles with the permit; and
8) Identification of being able to meet the issuance requirements identified in Section 5.1.3.2/4.

5.1.3.3 Permit Content

The Local Program shall prepare draft permits in accordance with 567 IAC 22.108 including but not limited to the items listed below.

1. Enforceable emission limitations and standards. Each draft permit shall include emissions limitations and standards, including those operational requirements and limitations that ensure compliance with all applicable requirements at the time of permit issuance as defined in 567 IAC 22.108(1).

2. Permit duration. The draft permit shall specify a fixed term not to exceed five years except:

a) Draft permits for Title IV affected sources shall have a fixed term of five years.

b) Draft permits prepared for solid waste incineration units combusting municipal waste subject to standards under section 129(e) of the Act shall have a term not to exceed 12 years. Such permits shall be reviewed every five years.

3. Monitoring.

a) Each draft permit shall contain the requirements with respect to monitoring as set forth in 567 IAC 22.108(3). Each draft permit shall include monitoring requirements no less stringent than those required in the applicable requirement, applicable Compliance Assurance Monitoring (CAM) requirements, or in the guidelines established in accordance with "b)" below, whichever is more stringent.

b) The Local Program shall, where the applicable requirement does not require periodic testing or instrumental or non-instrumental monitoring (which may consist of record keeping designed to serve as monitoring) or CAM requirements, establish protocols (consistent for each type of process or control) for periodic monitoring sufficient to yield reliable data for the relevant time period that are representative of the source's compliance with the permit.

1) The Local Program shall compile such protocols as established for the purposes of "b)" above, and establish a guideline showing generally acceptable monitoring practices for certain types of air pollution control equipment. These guidelines should represent a minimum standard. The guideline shall include all equipment types included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

4. Record keeping.

a) Each draft permit shall contain the requirements with respect to record keeping as established in 567 IAC 22.108(4). Each draft permit shall include record keeping requirements no less stringent than those required in the applicable requirement or in the guidelines established in accordance with "b)" below, whichever is more stringent.

b) The Local Program shall establish protocols, in concert with those established for monitoring, (consistent for each type of process or control) for record keeping which meet the requirements of 567 IAC 22.108(4) and are sufficient to ensure that the data collected will ensure the use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. The protocols shall ensure that the data required for record keeping must be reliable for the relevant time period that are representative of the source's compliance with the permit [as required in 567 IAC 22.108(3)(*Monitoring*)].

1) The Local Program shall compile such protocols and establish a guideline showing generally acceptable record keeping practices for certain types of air pollution control equipment. These guidelines should represent a minimum standard. The guideline shall include all equipment types included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

5. Reporting.

a) Each draft permit shall contain the requirements with respect to reporting as established in 567 IAC 22.108(5) where applicable. Each draft permit shall include reporting requirements no less stringent than those required in the applicable requirement or in the guidelines established in accordance with (b) below, whichever is more stringent.

b) The Local Program shall compile a guideline establishing acceptable reporting frequencies for activities requiring reporting. These guidelines should represent a minimum standard. The guideline shall include all equipment types included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

6. Risk management plan. If the source is required to develop and register a risk management plan (RMP) the draft permit shall state the requirement for submission of the plan. The permit shall also require filing the plan with appropriate authorities and an annual certification to the DNR that the plan is being properly implemented. The Local Program shall ensure RMPs are submitted to the local emergency planning committee.

7. Incorporating allowances. The Local Program shall ensure that the draft permit incorporates provisions, when applicable, which prohibit emissions exceeding any allowances that the affected source lawfully holds

under Title IV of the Act or the regulations promulgated thereunder. Each draft permit shall meet permit requirements with respect to emissions as required by 567 IAC 22.108(7) where applicable.

8. Severability clause. The draft permit shall contain a severability clause to ensure the continued validity of the various permit requirements in the event of a challenge to any portions of the permit.

9. Other provisions required to be listed in the draft permit.

a) The draft permit shall contain provisions establishing those conditions established in 567 22.108(9).

b) The Local Program shall develop a guideline establishing minimum standards for the operation and maintenance of pollution control equipment sufficient to determine continued operation of such equipment necessary to maintain compliance with applicable requirements. The guideline shall include all equipment types included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

10. Fees. The draft permit shall include a provision to ensure that the permittee pays fees and supplies all annual emissions reports to the DNR pursuant to 567 IAC 22.106.

11. Emissions trading. A provision of the draft permit shall state that no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the draft permit.

12. Operating Scenarios. Terms and conditions for reasonably anticipated operating scenarios identified by the source in its application and which are approved by the Local Program shall be incorporated into the draft permit if requirements established in 567 IAC 22.108(12) and other related requirements are met.

13. Terms and conditions of trading emissions increases and decreases. Terms and conditions of trading emissions increases and decreases shall be included in the draft permit if they meet the conditions and requirements established in 567 IAC 22.108(13).

14. Federally enforceable requirements. The draft permit shall meet requirements as established in 567 IAC 22.108(14).

15. Compliance requirements. All draft permits shall contain the elements with respect to compliance as established in 567 IAC 22.108(15).

16. Emergency provisions. All draft permits shall contain the elements with respect to emergency situations as established in 567 IAC 22.108(16).

17. Permit shield. As provided in 567 IAC 22.108(18) the draft permit shall include those provisions, as applicable, with regard to permit shields.

18. Permit reopening. The Local Program shall include provisions in the draft permit specifying the conditions under which the permit may be reopened and revised prior to the expiration of the permit. A permit shall be reopened and revised under the circumstances indicated in 567 IAC 22.108(17) and 22.114.

5.1.3.4 Preparation of a draft permit and fact sheet

The Local Program shall prepare a draft permit and a fact sheet. The Local Program shall provide the fact sheet to any other person who requests it. The fact sheet shall include:

1. The rationale for issuance or denial of the permit;

2. A brief description of the type of facility;

3. A summary of the type and quantity of air pollutants being emitted;

4. A brief summary of the legal and factual basis for the draft permit conditions, including references to applicable statutes and rules;

5. A description of the procedures for reaching final decision on the draft permit including the comment period, the address where comments will be received, and procedures for requesting a hearing and the nature of the hearing; and

6. The name and telephone number for a person to contact for additional information.

5.1.3.5 Permit Review by DNR

1. The Local Program shall provide DNR with the draft permit and fact sheet as soon as practical. Once the draft permit has been reviewed and any objections have been resolved, then the draft permit shall be provided to the facility for review.

2. Conveyance of proposed permit to DNR. The Local Program shall convey to DNR by electronic media or hard copy the following for all draft permits:

a) Copy of the draft permit and fact sheet in *Microsoft Word*.

b) All correspondence (in *Microsoft Word*) generated by the Local Program with regard to the permit, including but not limited to:

1) Completeness review and results, and

2) Requests made by the Local Program for additional information and the response.

5.1.3.6 Facility Review

The Local Program shall provide the facility no more than 30 days to review the draft permit prior to the start of the public comment period.

5.1.3.7 Permit review by EPA

1. Transfer of draft permit. The Local Program shall provide EPA with a copy of the draft permit at the start of the public comment period.

2. Response to EPA comments. The Local Program shall formulate a draft written response to written objections submitted by EPA if those objections are received within 45 days of EPA receipt of the draft permit. The Draft written response to EPA shall be submitted to DNR no later than 45 days from receipt of the objections if the objection has not been resolved.

5.1.3.8 Public notice and public participation

1. Public notice. The Local Program shall provide public notice and an opportunity for public comments, including an opportunity for a hearing, before recommending to DNR any of the following actions: issuance, denial or renewal of a permit; or significant modification or revocation or re-issuance of a permit.

2. Mailing list. The Local Program shall establish and maintain a mailing list for the distribution of public notices. The Local Program shall include DNR and EPA, Region VII, on the mailing list.

3. Publication and availability of notice. Notice shall be given by publication in a newspaper of general circulation in the area where the source is located or in a state publication designed to give general public notice. Notice also shall be given to persons on a mailing list developed by the Local Program, including those who request in writing to be on the list. The Local Program may use other means if necessary to ensure adequate notice to the affected public. The public notice shall include the following:

a) Identification of the Title V source;

b) Name and address of the permittee;

c) Name and address of the permitting authority processing the permit;

d) The activity or activities involved in the permit action;

e) The emissions change involved in any permit modification;

f) The air pollutants or contaminants to be emitted;

g) The time and place of any possible public hearing;

h) A statement that any person may submit written and signed comments, or may request a public hearing, or both, on the proposed permit. A statement of procedures to request a public hearing shall be included;

i) The name, address, and telephone number of a person from whom additional information may be obtained; and

j) Locations where copies of the permit application and the proposed permit may be reviewed, including the closest department office, and the times at which they shall be available for public inspection.

4. Public comment period. At least 30 days shall be provided for public comment. Notice of any public hearing shall be given at least 30 days in advance of the hearing.

5. Public hearing. Any person may request a public hearing. The Local Program shall hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. A public hearing may also be held at the Local Program's or the Director's discretion.

6. Response to comments. The Local Program shall keep a record of the comments and of the issues raised during the public participation process and shall prepare written responses to all comments received. The Local Program shall revise the draft permit in response to comments made during the comment period if the Local Program determines that modifications to the draft permit are warranted. The record of persons commenting, issues raised and the written responses shall be conveyed to the DNR with the final draft permit. The Local Program shall not make the written responses or subsequent changes to the draft permit public until the time that the DNR makes a final decision on the permit.

5.1.3.9 Final Permit Issuance

1. Changes to the draft permit. Subsequent to fulfilling all requirements for public notice, hearings and review by EPA, the Local Program shall incorporate those changes, as it deems appropriate into the proposed permit.

2. Conveyance of proposed permit to DNR. The Local Program shall convey to DNR by electronic media or hard copy the following for all final proposed permits:

a) The final proposed permits in *Microsoft Word*.

b) All correspondence (in *Microsoft Word)* generated by the Local Program with regard to the permit, including but not limited to:

1) Completeness review and results;

2) Requests made by the Local Program for additional information and the response;

3) Copy of all comments made during the comment period, including comments made by EPA if submitted during the comment period; and

4) The Local Program's response to written and oral comments made during the comment period by the public or by EPA.

5.1.3.10 Reopening issued Title V permits

1. Reopening. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. The Local Program shall reopen permits under the circumstances listed in 567 IAC 22.114(1) "a-e."

2. Public notice. The Local Program shall issue a notice of intent to the Title V source at least 30 days in advance of the date the permit is to be reopened, or as established under the authority defined in 567 IAC 22.114(3).

3. Proposed determination. Within 75 days of receipt of a notice from the administrator that cause exists to reopen a permit, the Local Program shall forward to the DNR a proposed determination of termination, modification, revocation, or re-issuance of the permit, as appropriate. The submission to DNR shall include all elements as required for initial final draft permit submittal.

5.1.3.11 Title V permit renewals

The Local Program shall renew Title V permits using the same procedural requirements that apply to initial permit issuance, including those for public participation and review by EPA.

5.1.3.12 Emissions Data

1. The Local Program shall, within the staffing and funding limitations specified in this LOA, conduct emissions inventory audits as identified by DNR to insure accurate and appropriate emission estimates are provided by air pollution sources.

2. The Local Program shall, within seven (7) days of determination of errors or missing data, request corrections or additional information from those facilities for which the emissions inventory submittal is determined to be flawed.

3. The Local Program shall notify the DNR upon receipt and determination of acceptability of the requested inventory information. The Local Program shall transmit to the DNR any corrected hard copy documentation provided by the facility for DNR data entry into SPARs and filing in the DNR Records Center.

5.1.3.13 Permit Changes

The Local Program shall process any permit changes to valid Title V permits as follows:

1. Changes allowed without a Title V permit revision: 567 IAC 22.110;

2. Administrative amendments to Title V permits: 567 IAC 22.111;

3. Minor Title V permit modifications: 567 IAC 22.112; and

4. Significant Title V permit modifications: 567 IAC 22.113.

5.1.3.14 Data Management

The Local Program shall work with the DNR to determine:

1. Training needs of the Local Program staff to complete their job functions using the operational SPARS web-enablement program; and

2. Accessibility, logistics, and security measures that need to be evaluated to ensure that the Local Program is able to complete work using the SPARS program.

5.1.3.15 Intergovernmental Cooperation

In order to assure uniform adoption of emissions inventory and operating permit application procedures the Local Program shall:

1. Adopt the inventory and application forms and data entry formats employed by DNR; and

2. Participate in the development of public workshops and other educational projects.

5.1.4 Compliance and Inspection Provisions

5.1.4.1 Compliance

1. Local Program. The Local Program has the primary responsibility for conducting the air pollution control program within Linn County. Nothing in this Contract, however, shall constitute (or be construed to constitute) a valid defense by regulated parties in violation of any local, state or federal statute, regulation or permit.

2. Compliance status. The Local Program shall routinely track, evaluate, and document the compliance status of major, synthetic minor, and minor facilities within Linn County.

3. Violations. The Local Program shall identify violations and initiate appropriate and timely enforcement actions as follows:

a) High Priority Violations. The Local Program shall determine if the violation should be classified as a High Priority Violation (HPV), as outlined in the December 22, 1998, EPA policy, The Timely and Appropriate (T&A) Enforcement Response to High Priority Violations. If the violation meets the qualification of a HPV, the Local Program shall issue a notice of violation (NOV) within sixty (60) days of designating a violation as an HPV. The violation shall be resolved and/or addressed by no later than 270 days after this designation is made.

b) Other Violations. If the violation does not meet the criteria for a HPV, the Local Program shall compile documentation within thirty (30) days of the date the violation was discovered and shall issue an NOV or other correspondence within sixty (60) days of the date of this date.

c) The Local Program shall resolve and/or address all violations (including HPVs) by taking one of the following actions:

1) Issuance of an NOV or other correspondence containing an outline of corrective action(s) which, if accomplished, will achieve compliance with the applicable provisions of the Linn County Rules; or

2) Issuance of a compliance schedule or an emission reduction program; or

3) Issuance of a fine (or other financial penalty as appropriate); or

4) Issuance of a unilateral or consent order with or without a fine (or other financial penalty as appropriate); or

5) Referral to the County Attorney, Board of Health, DNR, or EPA.

d) The Local Program shall copy the DNR on all NOVs or other correspondence for sources as described in Section 5.1.4.5/1 a-f, all follow-up correspondences, all demands for payment, fine issuances, order issuances, and referrals to the County Attorney.

4. Compliance schedules. Compliance schedules for addressing HPVs and any compliance schedule included in an enforcement order at major, synthetic minor and minor facilities within Linn County shall be conveyed to the DNR via hard copy or electronic media.

5. Noncompliance penalties. As part of unilateral or consent orders, the Local Program shall inform the source of noncompliance penalties contained in Section 120 of the Clean Air Act, as amended, and Iowa Code § 455B.131-.149.

6. PSD/DNR permits. For Construction or PSD permits issued by DNR for sources within Linn County, the Local Program shall assume ongoing source inspection responsibilities.

7. Title V permits. For Title V permits issued by DNR for facilities within Linn County the Local Program shall assume ongoing facility inspections, compliance, and evaluation responsibilities.

8. State enforcement. The DNR shall handle the enforcement for PSD and Title V applicability issues unless it is mutually agreed upon that the Local Program will handle the enforcement. Also, DNR shall handle the enforcement for Title V fee payment and the emission inventory. Once DNR permits are issued the Local Program shall handle the enforcement of the permits. In all cases where compliance with DNR issued permits cannot be achieved in a timely and appropriate manner through enforcement of Local Program restrictions, the Local Program shall forward all documentation to DNR for state enforcement action

5.1.4.2 Stack tests

The DNR and the Local Program shall jointly conduct a minimum of one (1) stack test observation and evaluation during the period of performance. The joint observation will include review of the facility's testing protocol, attendance at any pre-test meeting, observation of the stack test, and review of the testing results. The DNR and Local Program will mutually agree upon which stack test will be jointly observed and evaluated.

5.1.4.3 Inspections

1. Schedule. The Local Program shall, at a minimum, conduct inspections according to the plan submitted to EPA under EPA's Clean Air Act Stationary Source Compliance Monitoring Strategy, September 2010 and the following:

a) Complaints/"Problem" facilities take priority over inspections;

b) Compliance assistance visits shall be scheduled by the Local Program with the affected facility. Inspections shall be conducted in an unannounced manner except in cases where facility key personnel are unavailable for the facility is not operating and a return visit is needed to conduct the inspection.

c) The Local Program shall be observant of facilities that are not inspected and/or have unpermitted sources.

d) As Local Program resources allow, the following shall be completed:

1) NESHAP Facilities (for standards identified in 567 IAC 23.1(3) and (4)). Area Source NESHAP facilities shall receive a compliance assistance visit[1], upon initial identification, to ensure new and existing facilities are aware of the promulgated NESHAPs and their responsibilities under such standard;

2) Portable Sources shall be inspected annually;

3) New Minors shall receive a compliance assistance visit to ensure they are aware of air quality regulations; and

4) Existing Minors shall be inspected following issuance of new construction permit or conditional operating permit.

2. Joint inspections. At a minimum, two (2) compliance inspections of facilities (2 major sources) within the Local Program's jurisdiction shall be conducted jointly by staff of DNR and the Local Program during the time of performance. The facilities to be inspected shall be mutually agreed upon by the Local Program and DNR, Field Office #1. Prior to the joint inspection, the Local Program shall submit or make available to Field Office #1 copies of the applicable permits, the previous inspection report, and other pertinent data. In addition, within thirty (30) days following the joint inspection, the Local Program shall submit to Field Office #1 a copy of the inspection report and NOV or other correspondence, if applicable.

5.1.4.4 Variances

1. Issuance. The Air Pollution Control Officer, or designee, may issue a variance[2] for sources within Linn County in accordance with §10.15 of the Linn County Code of Ordinance.

2. Training Fires. Prior to issuance of a training fire permit, the Local Program shall inform the training agency of the requirements to submit an Asbestos NESHAP notification to DNR, as required by 567 IAC Paragraph 23.2(3) "g." This can be done by stating the requirement to submit a notification to the DNR and by providing the name and number of the state asbestos NESHAP contact on each training fire permit issued. The Local Program shall copy DNR at the time of issuance on all training fire permits issued.

5.1.4.5 Data Management

1. Compliance Monitoring Strategy (CMS) Flags. No later than September 1, 2014, the Local Program shall send to the DNR the CMS plan that identifies facilities intended to be inspected during SFY 2015.

a) Any changes to the CMS plan, which would include the adding or the removal of flags, shall be submitted to the DNR, within thirty (30) days of revision.

2. AFS reporting. Per Section 6.3.1 of this Contract, the Local Program shall update AFS, and submit via electronic media a copy of the summary of facility actions to the DNR, on a quarterly basis (in accordance with Section 6.3.2) with compliance and enforcement information concerning federally reportable sources. Updates and transfer of information shall meet the minimum data requirements and codes specified in the most recent version existing on the first day of each month that the report is required of EPA's AFS Business Rules Compendium, plus any data elements negotiated with EPA's Region VII. Monthly updated information may include, but is not limited to:

a) Major facilities; and

b) Synthetic Minor facilities; and

c) Part 61 NESHAP Minor facilities; and

d) Other facilities identified within the CMS Evaluation Plan; and

e) Any facility with a formal enforcement action; and

f) Any facility with an active HPV.

3. Quarterly Reports. The Local Program shall submit quarterly reports for compliance actions, inspections and variances for minor, major, and non-point sources during each quarter to the DNR, per Section 6.3.2 of this Contract. The report shall contain the following information:

a) Name of facility;

b) Facility address;

c) Type of compliance action (if applicable);

d) Reason for compliance action, inspection or granting variance;

e) HPV designation (if applicable);

f) Type of source or materials burnt;

g) Rule citation; and

h) Local Program contact.

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[1] A compliance assistance visit is a tool to disseminate information on what the facility needs to do to come into or remain in compliance.

[2] Each open burning permit issued for items other than those exempted by 567 IAC Subrule 23.2(3) shall constitute a variance.

5.1.4.6 Emissions Data

1. Source testing. The Local Program shall observe emission tests or require emissions testing as provided for in the Linn County Rules. Any emission test performed within Linn County as a determination of compliance for existing sources shall be consistent with federal reference methods. The results of such tests shall be reported to EPA through AFS.

2. Records. The Local Program shall retain reports of excess emissions for all principle emission points at major, synthetic minor, and minor facilities in accordance with 567 IAC Chapter 24.

5.1.5 Ambient Air Monitoring Provisions

5.1.5.1 Monitoring Network

1. Network Modifications.

a) Scheduled Network Modifications. The Local Program shall operate the monitoring network indicated in Table 2 with modifications indicated in Table 3. Sampling frequencies are as indicated in Table 2 and 3.

b) Unscheduled Network Modifications. The Local Program, upon request, shall work with the DNR to add or remove monitoring sites as requested by the DNR. Changes shall be negotiated and agreed upon in writing between DNR's monitoring contact and the Ambient Air Monitoring Supervisor.

2. Equipment Procurement. The Local Program shall coordinate equipment purchases with the DNR in order to maintain the existing network and accomplish network modifications.

a) Final Equipment List. By July 1, 2014, the Local Program shall submit a list of equipment it intends to purchase with funds as identified in the Section 5.1.1.2/2 budget, item 5. The items on this list shall be mutually agreed upon (as per Section 5.1.5.3/4a and b) by the DNR and the Ambient Air Monitoring Supervisor.

b) Revision of Equipment List. Changes to the equipment list submitted shall be negotiated and agreed upon in writing between the DNR's monitoring contact and the Ambient Air Monitoring Supervisor.

3. Monitoring Sites. The Local Program's monitoring network shall meet or exceed the minimum specification set indicated in Appendices D and E of 40 CFR 58.

4. Daily Polling. The Local Program shall poll its continuous monitors each day and issue immediate reports to DNR as described in Section 5.1.5.4/10.

5. High Concentration Reports. The Local Program shall designate an individual on its monitoring staff to be on call during off hours in order to respond to high level reports generated by ESC data loggers at its continuous monitoring sites. When these levels indicate a likely exceedance of ambient health thresholds, the staff member shall evaluate the validity of the data. If the data is determined to be suspect or invalid, the staff member shall suspend real time posting of the data. If the data is determined to be valid, then the staff member shall supply notifications of high concentrations as indicated in the Local Program QAPP.

TABLE 2: Ambient Air Monitoring Network

Site	Parameter	# of Monitors	Sampling Frequency
Coggon Elementary School 408 E. Linn St., Coggon	O_3 (with daily auto-calibration)	2	Continuous (collocated)
Kirkwood Community College 6301 Kirkwood Blvd. SE, Cedar Rapids	O_3 (with daily auto-calibration)	2	Continuous (collocated)
Prairie Creek 3000 C St. SW, Cedar Rapids	Trace level SO_2	1	Continuous
Linn County Public Health 501 13th Street; Cedar Rapids	O_3 (with daily auto-calibration)	2	Continuous (collocated)*
	$PM_{2.5}$ (FRM) (collocated)	1	Primary Daily Collocated Every 3rd Day
	$PM_{2.5}$ (BAM)	2	Continuous
	$PM_{2.5}$ (Speciation)	1	Every 6th Day
	URG-3000N ($PM_{2.5}$ Carbon Speciation)	1	Every 6th Day
	PM_{10} (FRM) (collocated)	2	Primary: Every 3rd Day. Collocated: Every 6th Day.
	MET (including RH and Temp)	1	
	Trace level SO_2	1	Continuous
	Trace level CO	1	Continuous
	Toxics Carbonyls and TO-15	1	Continuous Canisters: Every 12th Day. Carbonyl Cartridges: Every 6th Day Inside Ozone Season, and Every 12th Day Outside Ozone Season.

TABLE 3: Ambient Air Monitoring Network Modifications

Change	Description	Date Due
Discontinue	Discontinue RTI component of speciation sampling at Linn Co. Health Department (shut down Teflon channel of Met One SuperSASS, and all channels URG3000N)	12/31/2014
Addition	For filters analyzed by SHL at Linn Co. Health Department: collect at 1 in 6 on each of two nylon channels of Met One SuperSASS	12/31/2014

5.1.5.2 Quality Assurance

1. Quality System. The Local Program shall develop and implement an EPA Quality System to assure the quality of its air monitoring activities. The Quality System developed by the Local Program shall be completely autonomous from that of DNR. For autonomy, the Local Program has the responsibility for

developing procedures and oversight sufficient to demonstrate that the environmental data generated meets the requirements of EPA and/or DNR. The Local Program Quality System shall include:

a) Development and implementation of a Quality Management Plan (QMP) according to EPA guidance document QA/R-2;

b) Development and implementation of Quality Assurance Project Plans (QAPPs) consistent with EPA guidance document QA/R-5; and

c) Development and implementation of Standard Operating Procedures (SOPs) for operation of air monitoring equipment, data handling, and other repetitive procedures. The QAPP/SOP shall be modified as necessary to remain current with EPA requirements outlined in 40 CFR Part 58, the current edition of EPA's Quality Assurance Handbook for Air Pollution Measurement Systems ("the Redbook"), and applicable EPA guidance. The Local Program shall designate members of its Air Monitoring Staff as QAPP/SOP reviewers. A complete set of QMP/QAPPs/SOPs for all air monitoring activities shall be submitted to DNR and EPA in hardcopy and in PDF format as a component of the annual review of air monitoring activities.

2. Revision of Quality Assurance Documents. Substantive revisions of the Local Program's QMP/QAPPs/SOPs require approval of DNR and EPA. Except as otherwise indicated in this Contract, QAPP/SOP revisions shall be submitted to EPA/DNR within forty (40) working days following:

a) Promulgation of new monitoring rules or procedures by EPA;

b) Written notification of a deficiency in procedures by EPA/DNR; or

c) Receipt of new equipment for which no QAPP/SOP exists.

The Local Program shall not deploy monitoring equipment without an associated QAPP/SOP.

3. Prevention of Significant Deterioration Ambient Monitoring Sites. Within 30 days of DNR's written request the Local Program shall review and provide written comments on the standard operating procedures and quality assurance plans, associated with the PSD ambient monitoring projects within the Local Program's jurisdiction. The DNR may request the Local Program to perform (quarterly) site audits of facility-run PSD ambient monitoring sites at specified PSD facilities. These site audits are to be performed in accordance with Appendix A of 40 CFR Pt. 58. Within two (2) weeks following the site audit, the Local Program shall provide, in writing, the audit results and any recommendations for corrective actions to both DNR and the field staff operating the PSD site(s). To ensure that the data gathered at PSD monitoring sites meets EPA acceptance criteria for completeness, precision and accuracy, and to establish format compatibility with EPA's Air Quality System (AQS) database, the Local Program shall provide quality assurance reviews on ambient monitoring data generated by facility-run PSD monitoring sites, as specified by DNR. The number of PSD monitoring sites shall be limited to no more than four (4) sites per year.

4. External Audits. The Local Program shall participate in EPA's National Performance Audit Program (NPAP), performance evaluation program (PEP) for $PM_{2.5}$ monitoring, and EPA technical systems audits (TSA's). In addition, the Local Program shall participate in quality assurance systems audits conducted by the State Hygienic Laboratory (SHL). The Local Program shall fund at least one annual NPAP audit for all monitors for which NPAP audit devices are available. The Local Program shall respond promptly to address deficiencies identified in these audits.

5. Annual Network /Quality Assurance Review. By March 15, 2015, the Local Program shall complete and submit to DNR an annual network/quality assurance review for calendar year 2014 in order to demonstrate that its quality system is sufficiently developed, and its monitors are appropriately sited and adequate in number to meet EPA's minimum requirements. In addition, the Local Program shall review its AQS and Precision and Accuracy data and site/monitor parameters in the AQS database for errors during calendar year 2014, and generate graphical and statistical summaries of the data. The Local Program shall evaluate the data relative to EPA acceptance criteria for data completeness, precision and accuracy. On the basis of this review, the Local Program shall submit its annual SLAMs certification letter. The Annual Network/Quality Assurance review shall contain the following components and the review shall be submitted to the DNR via both hard copy and electronic media. Any emails shall contain in the subject line a specific reference to the applicable Section 5.1.6 obligation.

a) A complete, current set of Quality Assurance documentation (QMP/QAPPs/SOPs);

b) AQS and Precision and Accuracy raw data listings generated from the AQS system [AQS QA Raw Assessment report (AMP 251), and AQS Raw Data Report (AMP 350)] for all monitors operated by the Local Program during calendar year 2014;

c) Graphs of concentration vs. time (and concentration vs. wind direction where applicable) for all monitors operated by the Local Program during calendar year 2014;

d) Complete, current network review checklists to document conformance with 40 CFR Part 58 Appendix E requirements;

e) An annual quality assurance report following the example contained in Volume II, Appendix I, of EPA's Quality Assurance Handbook for Air Pollution Measurement Systems (rev 12/10/08);

f) An annual State and Local Air Monitoring Stations (SLAMS) report consisting of an AMP 600 and 450NC along with a letter certifying the accuracy of the report based on a review of all materials contained in the annual review; and

g) A report from the Ambient Air Monitoring Supervisor indicating the results of an audit comparing the procedures actually used by the field operators to operate and maintain air monitoring equipment with the written standard operating procedures for the equipment. In the event that discrepancies exist between the actual and written procedures, the report shall detail these discrepancies, establish the validity of the data gathered with the undocumented procedures, and update standard operating procedures, where necessary, to reflect actual field practice.

5.1.5.3 Network Planning

1. Training and Safety Plan. The Local Program shall develop training and safety plans for air monitoring staff. The Local Program shall insure that its staff are adequately trained and work in a safe environment.

2. Quarterly Coordination Meetings. The Local Program shall participate in quarterly coordination meetings for technical and management staff involved in the ambient air monitoring program. The technical meeting shall focus on data collection, transmission and quality assurance issues and trends. The management meeting shall focus on the status of work products contained in the Contract and strategic planning issues.

3. Inventory and Inventory Reporting. The Local Program shall maintain a complete and current list of all equipment in its air monitoring network purchased in full or in part with state or federal funding, including the location, description of equipment type, model number, serial number, ownership agency, and both DNR and the Local Program inventory tag number. The Local Program shall record in the equipment inventory the installation date for equipment newly installed in the air monitoring system. Equipment purchased by the DNR for use by the Local Program shall be included on the Local Program's equipment inventory. The Local Program shall supply the DNR a copy of the up to date equipment inventory within seven (7) days of a request by the DNR.

4. Development of the Equipment Procurement List for the Next Contract Period.

a) By January 15, 2015, the Local Program shall submit for DNR review:

1) A list of anticipated equipment purchases needed to maintain and operate its existing air monitoring network during the next Contract period; and

2) A multi-year replacement schedule for air monitoring equipment. To develop this scheduled, the Local Program shall consider the age and condition of the current instruments, as well as the maintenance requirements and capabilities of current instruments relative to new instruments.

b) By March 15, 2015, the Local Program shall submit for DNR review a list of anticipated equipment purchases needed to expand its air monitoring network during the next Contract period.

c) The above mentioned lists shall contain monitoring equipment or monitoring quality assurance equipment that the Local Program intends to procure with funds designated for this purpose under this Contract as identified in Section 5.1.1.2/2, budget item 5.

5. Network Modifications. The Local Program shall work with the DNR to ensure that network modifications are made according to 40 CFR Pt. 58, Subpart B.

5.1.5.4 Data Management

1. Data Validation. Data obtained from ambient monitors shall be validated as specified in the approved QAPP and in this scope of work.

2. Site Setup and Closure in AQS. The Local Program shall be responsible for opening and closing sites and monitors in the AQS database for its reporting organization, and for its monthly data uploads. The Local Program shall notify the DNR when it closes sites or monitors in the AQS database.

3. AQS/Precision, Bias, and Accuracy Data Submission. Validated monitoring data (AQS data) and precision and accuracy data (PARS data), for all monitors, shall be uploaded by the Local Program staff monthly, in accordance with Section 5.1.6 (Ambient Air Monitoring) of this Contract. To expedite data generation by SHL, the Local Program shall provide validated sampler run data at the same time integrated samples are submitted to SHL for laboratory analysis. If $PM_{2.5}$ data from the SHL laboratory has not been received before the scheduled monthly upload, it shall be entered at the next scheduled monthly upload. The Local Program shall inform the DNR via e-mail after completing its monthly data upload. In the event

that the monthly data upload is not complete, the Local Program shall indicate in the report the reason for the backlog and the anticipated date when the backlogged data will be uploaded.

4. Data Screening. To prevent data coding errors, the Local Program shall lock data for upload only after the screening file passes all AQS system edit checks. The Local Program shall archive a copy of any data uploaded to AQS immediately before locking the data for upload.

5. Recordkeeping Requirements.

a) Monthly AQS Recordkeeping Requirements. On a monthly basis, the Local Program shall run and review the AQS Raw Data Report (AMP 350) to determine the completeness and accuracy of the AQS and PARS data uploaded by the Local Program to the AQS system.

b) Quarterly AQS Recordkeeping Requirements. On a quarterly basis, the Local Program shall:

1) Run and review AQS QA Raw Assessment Report (AMP 251) and AQS QA Data Quality Indicator Report (AMP 256) to evaluate the Precision, Bias, and Accuracy of data uploaded by the Local Program in accordance with 40 CFR Part 58;

2) Run and review the AQS Data Completeness Report (AMP 430) in order to evaluate the quarterly data completeness of the monitors operated by the Local Program; and

3) Run and review the AQS Site Description Report (AMP 380) in order to evaluate the accuracy and completeness of the site setup parameters of the monitors operated by the Local Program.

6. Real-time monitoring. The Local Program shall post all continuous ambient monitoring data (including collocated monitoring data) to EPA's AIRNOW website. In addition, the Local Program shall post all continuous ambient data to the Local Program's website, along with up to date Air Quality Index reports. The Local Program shall update its QAPP and SOPs to insure that all real-time monitoring data is complete and accurate.

7. Toxics Monitoring Activities. The Local Program shall use SHL's analytical laboratory for toxics sample analysis. The Local Program shall be responsible for setting up or shutting down toxics sites in AQS, and shall validate toxics data in cooperation with the SHL laboratory. The Local Program shall upload the AQS strings provided by SHL into EPA's AIRS database.

8. Metals Monitoring Activities. The Local Program shall use SHL's analytical laboratory for metals sample analysis. The Local Program shall be responsible for setting up or shutting down metals sites in AQS, and shall validate metals data in cooperation with the SHL laboratory. The Local Program shall upload the AQS strings provided by SHL into EPA's AQS database.

9. $PM_{2.5}$ Speciation Activities. The Local Program shall perform the following activities in support of the State's $PM_{2.5}$ speciation network:

a) Field Activities. The Local Program shall perform all field activities at speciation sites specified in this Contract including cyclone replacement, filter collection and transmission of sampler performance data to EPA's National Speciation Laboratory. In addition, the Local Program shall be responsible for the performance of all calibrations, audits, and routine maintenance for all $PM_{2.5}$ speciation monitors;

b) Data validation and AQS maintenance. The Local Program shall work in cooperation with EPA's National Speciation Laboratory to set-up or shut down speciation sites in AQS and to validate speciation data; and

c) Support of EPA Intensive Studies. When requested by DNR, the Local Program shall adopt an accelerated sampling frequency at its speciation sampling site for a period of up to one month.

10. Reporting Requirements. The Local Program shall submit regular reports to DNR as identified below. Reports shall be submitted to the DNR via both hard copy and electronic media. Any emails shall contain in the subject line a specific reference to the applicable Section 5.1.6 obligation. Monthly and Quarterly reports shall contain an executive summary where the data is compared to the applicable acceptance criteria, and in the event that the acceptance criteria are not met, a corrective action plan. All reports shall be reviewed and certified by the quality assurance officer. All corrective action plans shall be reviewed and certified by the program manager.

a) Immediate Reports. The Local Program shall notify DNR immediately upon identification of any exceedance of an ambient air quality standard, emergency episode or potential emergency episode (as defined in 567 IAC 26.2); or exceedance of any other pollutant threshold provided in writing by the DNR.

b) Weekly Network Status Report. The Local Program shall transmit a written report of the status of air monitoring systems to DNR on the first working day of every week. This report will address the following items with respect to monitoring completed each week. For each site that is modified or for which data are missed, the report shall include:

1) Date of last valid data;

2) Date inoperative condition detected;

3) Cause of inoperative condition;
4) Step(s) taken to correct condition; and
5) Date and time data collection resumed (if applicable), and expected date data reporting will resume (if applicable).

c) Monthly Report for Continuous Monitors. The Local Program shall submit a monthly report to DNR in accordance with Section 6.3.1 of this Contract. This report will include a list of fixed station air monitoring sites in operation during the report period, and for each station:

1) The number of samples collected or received;
2) The number and type of analysis performed;
3) The number and exceedances of ambient air quality standards, the number of emergency episodes or potential emergency episodes, and the number of exceedances of pollutant thresholds;
4) A listing of all sampling that was omitted or invalidated because of equipment failure, calibration, zero and span checks, sample handling accidents, laboratory accidents or failure of the operator to collect samples; the type and number of equipment failures;
5) The dates of precision and accuracy checks; an explanation for precision checks that occur with a separation greater than 2 weeks for both primary and collocated samplers;
6) The percentage of total possible samples which were translated into valid air quality data; including data from primary and collocated samplers;
7) A performance evaluation of the "Smart Heaters" on the BAM 1020 $PM_{2.5}$ monitor(s).

d) Monthly Reports for data generated by outside contractors. SHL-$PM_{2.5}$ and PM_{10} FRM, SHL-Air Toxics, and RTI $PM_{2.5}$ Speciation. The Local Program shall submit a report to the DNR twenty (20) working days upon receiving data from each outside contractor. Reports will include:

1) Documentation of the dates data were received from outside contractors and submitted to DNR;
2) NAAQS exceedances including: the number and exceedances of ambient air quality standards, the number of emergency episodes or potential emergency episodes, and the number of exceedances of pollutant thresholds;
3) Pollutant Data Summaries including: a listing of all sampling that was omitted or invalidated because of equipment failure, calibration, zero and span checks, sample handling accidents, laboratory accidents or failure of the operator to collect samples, the type and number of equipment failures, and the percentage of total possible samples which were translated into valid air quality data including data from primary and collocated samplers. In the event the percentages do not meet EPA completeness criteria, an explanation of the reasons for the insufficient data capture and a corrective action plan for the monitor;
4) The precision and accuracy for each primary and collocated continuous monitor, calculated as specified in 40 CFR Pt. 58 App. A;
5) The precision and accuracy for $PM_{2.5}$ FRM, PM_{10} FRM, and toxics monitors audited during the quarter, calculated as specified in 40 CFR Pt. 58 App. A; and
6) Data Summary for $PM_{2.5}$ Speciation and Air Toxics including: results from monthly flow verification, results of leak checks, and list of flagged/voided data.

e) Monthly Equipment Procurement Report. The Local Program shall submit a monthly report to the DNR which itemizes monitoring equipment purchases. This report shall include:

1) A description of the equipment, the quantity purchased;
2) The cost per unit and total cost, the dates the items were ordered and received; and
3) A running total of all expended equipment funds during the Contract period.

f) Quarterly Monitoring Report. The Local Program shall submit a quarterly report to DNR in accordance with Section 5.1.6 of this Contract. For data received from outside contractors (SHL-$PM_{2.5}$ and PM_{10} FRM, SHL-Air Toxics, and $PM_{2.5}$ Speciation), quarterly reports will be submitted twenty (20) working days upon receiving the data. This report shall include a list of fixed station air monitoring sites in operation during the report period, and for each station:

1) The data completeness associated with each monitor, and in the event the percentages do not meet EPA completeness criteria, an explanation of the reasons for the insufficient data and corrective action plan for the monitor;
2) The precision and accuracy of the monitors audited during the quarter, calculated as specified in 40 CFR Pt. 58 App. A;
3) AMP Reports 430 and 251 generated from AQS;

4) Two AQS AMP 256 reports, one for the current quarter, and a cumulative AMP 256 covering all quarters since the previous data certification, along with an explanation of any deficiencies indicated in the report, and a corrective action plan to address any deficiencies.

5) A listing of all backlogged AQS or PARS data, the reason for the backlog, and the date when the backlogged data will be uploaded to AQS; and

6) A records audit, conducted by the QA officer, listing monitoring records logged during the quarter and certifying compliance with the recordkeeping requirements of this Contract.

5.1.5.5 Special Projects.

1. Zero air testing. Zero air testing of all continuous $PM_{2.5}$ monitors shall be performed at least semi-annually.

2. Security and Backup of Computers used for Ambient Monitoring. By September 1, 2014, the Local Program IT staff shall perform an audit to ensure that all computers used in the ambient monitoring network are secured and adequately "backed up".

3. Thermo 2025i training. The Local Program shall host a one-day training session conducted by instructors from Thermo for the model 2025i PM sampler no later than November 30, 2014. The training shall cover topics such as installation and configuration, routine operation, and data processing.

5.1.6 Summary of Obligations. The following are obligations the Local Program shall complete to meet tasks identified in this Contract.

Obligation	Reference	Task Milestone Date
Program Management		
Copy of Release of Work	5.1.1.5/3a	within 7 days of release for work
Personnel Changes	5.1.1.1/6	10 days from effective date
New Personnel Report	5.1.1.1/7	10 days from start date
Website – Review & Update As Needed	5.1.1.5/1	November 15, 2014
Website Quarterly Report (As Needed)	5.1.1.5/3b	November 15, 2014
MBE/WBE	5.1.1.7	November 15, 2014
Proposed training plan	5.1.1.1/4	January 15, 2015
Personnel Plan	5.1.1.1/8	January 15, 2015
Proposed Budget	5.1.1.2/1	January 15, 2015
Website Plan	5.1.1.5/4	January 15, 2015
Personnel Report	5.1.1.1/5	February 15, 2015
Website – Review & Update As Needed	5.1.1.5/1	February 15, 2015
Website Quarterly Report (As Needed)	5.1.1.5/3b	February 15, 2015
MBE/WBE	5.1.1.7	February 15, 2015
Initial Contract Review	5.1.1.3	March 15, 2015
Final Contract Review	5.1.1.4	April 30, 2015
Website – Review & Update As Needed	5.1.1.5/1	May 15, 2015
Website Quarterly Report (As Needed)	5.1.1.5/3b	May 15, 2015
MBE/WBE	5.1.1.7	May 15, 2015
Rule Revision	5.1.1.6/3	June 1, 2015
Website – Review & Update As Needed	5.1.1.5/1	August 1, 2015
Program Management cont'd		
Website Quarterly Report (As Needed)	5.1.1.5/3b	August 1, 2015
Personnel Report	5.1.1.1/5	August 1, 2015
MBE/WBE	5.1.1.7	August 1, 2015
Construction Permitting		
Final PSD permit issued	5.1.2.7/3	180 days plus DNR review time
Receipt of 80% PSD pre-application	5.1.2.8/2a	2 weeks prior to pre-meeting
Copy of PSD pre-application to DNR & EPA	5.1.2.8/2b	10 days prior to pre-meeting or after receipt of 100% application
Electronic Copy of Draft PSD permit	5.1.2.12	Prior to public comment period
Public Comment Materials	5.1.2.14	10 days prior to public comment
BACT Data	5.1.2.16/4	30 days after issued
Excel Report (and AFS if desired)	5.1.2.6/1	November 15, 2014

Obligation	Reference	Task Milestone Date
Excel Report (and AFS if desired)	5.1.2.6/1	February 15, 2015
Excel Report (and AFS if desired)	5.1.2.6/1	May 15, 2015
Excel Report (and AFS if desired)	5.1.2.6/1	August 1, 2015
Title V Permitting		
Status Reports	5.1.3.2/4b	November 15, 2014
Status Reports	5.1.3.2/4b	February 15, 2015
Status Reports	5.1.3.2/4b	May 15, 2015
Issuance Schedule	5.1.3.2/4a	May 15, 2015
4 initial/renewal permits	5.1.3.2/4	June 30, 2015
Status Reports	5.1.3.2/4b	August 1, 2015
Compliance		
Compliance Submission to AFS	5.1.4.5/2	Monthly on 15th
Joint Inspection Schedule	5.1.4.3/2	Prior to each
Joint Inspection Report	5.1.4.3/2	30 days following each
CMS Plan	5.1.4.5	September 1, 2014
Compliance Qtrly	5.1.4.5/3	November 15, 2014
Compliance Qtrly	5.1.4.5/3	February 15, 2015
Compliance Qtrly	5.1.4.5/3	May 15, 2015
Minimum 1 Joint Stack Test	5.1.4.2	June 30, 2015
Compliance Qtrly	5.1.4.5/3	August 1, 2015
Ambient Air Monitoring		
Exceedence Report	5.1.5.4/10a	Immediate
Monthly Report: SHL-PM FRM Monthly Report: SHL-Air Toxics Monthly Report: RTI-Speciation	5.1.5.4/10d	20 days after receipt from outside contractor
Weekly Network Status Report	5.1.5.4/10b	Weekly – 1st working day
Monthly Continuous Monitor Report	5.1.5.4/10c	Monthly on 15th
AQS/PARS Data Submission	5.1.5.4/3	Monthly on 15th
Monthly AQS Recordkeeping Requirements	5.1.5.4/5a	Monthly
Monthly Equipment Procurement Report	5.1.5.4/10e	Monthly
Quarterly AQS Recordkeeping Requirements	5.1.5.4/5b	Quarterly
Coordination Meetings	5.1.5.3/2	Quarterly
Zero-air testing	5.1.5.5/1	Semi-annually
Final Equipment List	5.1.5.1/2a	July 1, 2014
Ambient Air Monitoring cont'd		
Computer audit (security and adequacy of backup)	5.1.5.5/2	September 1, 2014
Qtrly Monitoring Report (Continuous)	5.1.5.4/10f	September 1, 2014
Thermo 2025i training	5.1.5.5/3	November 30, 2014
Qtrly Monitoring Report (Continuous)	5.1.5.4/10f	December 1, 2014
Speciation changes at Linn Co. Health Dept.	Table 3	December 31, 2014
List of equipment to maintain & operate existing network	5.1.5.3/4a1	January 15, 2015
Equipment Replacement Schedule	5.1.5.3/4a2	January 15, 2015
Qtrly Monitoring Report (Continuous)	5.1.5.4/10f	March 1, 2015
Annual Network/Quality Assurance Review	5.1.5.2/5	March 15, 2015
List equipment to expand network (next Contract)	5.1.5.3/4b	March 15, 2015
Qtrly Monitoring Report (Continuous)	5.1.5.4/10f	June 1, 2015

5.2 The responsibilities of the DNR shall be to perform the following tasks.

5.2.1 Review of Local Program

1. **Review of Rules.** DNR shall review proposed changes to the rules, policies, and procedures of the Local Program for consistency with the Iowa Code and Iowa Administrative Code.

2. Program Audit. Biennially, the DNR shall audit the Local Program to document compliance with the Contract, specifically with Section 5.1 – Statement of Work, and to identify aspects of the program that either party should further improve. The DNR shall provide a draft written report of the audit to the Local Program within thirty (30) days of the audit. The DNR shall provide the final written report of the audit to the Local Program within ninety (90) days of the audit.

3. Training Plan Recommendations. By February 1, 2015, DNR shall provide the Local Program with any recommendations to the training plans as submitted. DNR shall provide written justification in conjunction with all recommendations.

4. Contract Planning. The DNR shall with Local Program assistance, determine if a meeting should be held prior to January 15, 2015 to identify priorities and responsibilities being considered for the SFY 2016 Contract. DNR shall afford the Local Program an additional meeting as per Section 5.2.1/7.

5. Initial Draft Contract. By February 15, 2015, DNR shall submit to the Local Program the initial draft Contract for the period of July 1, 2015 through June 30, 2016. DNR shall provide written justification for any changes to the Contract.

6. Final Draft Contract. By April 15, 2015, DNR shall submit to the Local Program the final draft Contract for the period of July 1, 2015 through June 30, 2016.

7. Contract Negotiations. Annually, if requested by the Local Program and/or the DNR, the two parties shall meet to discuss final changes to the Contract.

8. Program Changes. The DNR shall submit information on significant changes to program requirements and staffing as a result of the DNR's audit of the Local Program within ninety (90) days of the audit.

5.2.2 Construction Permitting Provisions

1. Construction permit manual. DNR shall inform the Local Program of all updates or attachments to the construction permit manual during their development and transmit copies of these to the Local Program as soon as they are finalized.

2. PSD/Construction permit applications. On receipt of a complete application and draft permit from the Local Program, DNR shall review the draft permit and complete application package for PSD and 112(g) applicability and will notify the Local Program within three (3) weeks of receipt as to the disposition. Should the Local Program request DNR review of a draft permit for PSD synthetic minor and federal NSPS and NESHAPS sources, the DNR shall concur or object to the Local Program's draft permit within three (3) weeks of receipt.

3. Issuance of PSD permit. For Linn County facilities, the DNR shall

a) Review draft permits and issue final PSD permits; and

b) Review applications and issue 112(g) permits.

4. Progress of review. DNR shall keep the Local Program informed of developments during this review. Upon request DNR shall review the associated dispersion modeling analyses and assess the impact on ambient air quality. DNR shall forward the results of such modeling back to the Local Program within three (3) weeks of receipt of an application or request from the Local Program, as resources allow.

5. Technical assistance. Upon request, DNR shall provide technical assistance for review of other permit applications. This assistance may include conducting or reviewing dispersion modeling analyses associated with the permit applications. DNR shall forward the results of such modeling back to the Local Program within the time period agreed upon by the Local Program and DNR.

6. Modeling meetings. If requested by the Local Program and/or the DNR, the two parties shall meet to discuss modeling issues. The DNR shall meet with Local Program technical staff involved in ambient air modeling. This meeting will focus on DNR modeling guidance, procedures/checklists and their application, and specific questions related to conducting and review of dispersion modeling.

7. Local Program Copies. The DNR shall convey to the Local Program one copy of each of the following as applicable:

a) PSD Permit Application Package received for any source operating within the Local Program's jurisdiction;

b) Each signed, final permit after the permit has been issued; and

c) Applications submitted to DNR, for the modification of permits issued for sources in the Local Program's jurisdiction

5.2.3 Title V Permitting Provisions

1. DNR shall convey to the Local Program one copy of any Title V Operating Permit Application received for any source operating within the Local Program's jurisdiction or notify the Local Program if the application is received in SPARS.

2. DNR shall review draft Title V operating permits and provide response within two weeks of submittal by the Local Program.

3. DNR shall issue Title V operating permits to Linn County Facilities.

4. DNR shall provide the Local Program with one copy of each final permit after the permit has been issued.

5. Applications submitted to DNR, for the modification of permits issued for sources in the Local Program's jurisdiction, shall be conveyed to the Local Program for processing the same way as initial or renewal applications unless the modification applications are received in SPARS, in which case the Local Program shall be notified by the DNR of such submittals.

6. Issuance Schedule comments. DNR shall review and make initial comments on proposed issuance schedule submitted by the Local Program within seven (7) working days. .

5.2.4 Compliance and Inspection Provisions

5.2.4.1 Compliance

1. DNR involvement. Except for DNR issued permits, DNR shall limit its involvement in compliance activities to Local Program audits as well as review and comment on proposed compliance schedules unless:

a) The Local Program specifically requests DNR involvement;

b) DNR determines that the Local Program's enforcement response is inappropriate or untimely (see Section 5.2.4.1/5); or

c) Emergency conditions (as prescribed in Iowa Code 455B.139) exist (see Section 5.2.4.1/6).

2. Compliance schedule comments. DNR shall review and make initial comments on proposed compliance schedules submitted by the Local Program within seven (7) working days. DNR shall provide written comments to the Local Program within twenty (20) days.

3. Local program compliance schedules. DNR shall recognize compliance schedules required by the Local Program in accordance with Chapter 10 of the Linn County Code of Ordinance in lieu of granting a variance and approval of an emission reduction program by DNR under 567 IAC Chapter 21 for any source within the jurisdiction of the Local Program.

4. Compliance Monitoring Strategy (CMS) Flags. DNR shall data enter the CMS flags and any revisions to the CMS plan into the AFS system after receiving the information from the Local Program.

5. Review of AFS inputs. DNR will routinely review AFS inputs (as well as other compliance/enforcement information available to the DNR through audit activities and other sources) to determine if the Local Program is taking timely and appropriate action in response to noted violations.

6. Enforcement actions. DNR may initiate enforcement actions where specific Local Program actions regarding a specific individual set of circumstances are determined by DNR to not be timely or appropriate. DNR shall provide a written position with regard to the enforcement action and allow the Local Program a reasonable opportunity to act prior to initiating any DNR enforcement actions, except as provided in Items 6 and 7 below.

7. Emergencies. DNR shall notify the Local Program at the earliest possible time upon any determination of an emergency pursuant to Iowa Code 455B.139. As soon as the situation allows, DNR shall initiate discussions with the Local Program for the purpose of transferring mitigation efforts to the Local Program.

8. Enforcement by DNR. In cases where compliance with DNR issued permits is not achieved in a timely and appropriate manner through enforcement of Local Program restrictions, DNR shall initiate enforcement action to ensure compliance with DNR issued permits.

5.2.4.2 Inspections

During the Contract period, DNR shall conduct two (2) compliance inspections in conjunction with the Local Program. DNR shall review joint compliance inspection reports and will submit written critiques of jointly conducted inspections to the Local Program within two (2) weeks of receipt of the inspection report.

5.2.4.3 Stack tests

1. DNR shall coordinate with the Local Program in scheduling and conducting a minimum of one (1) joint stack test observation and evaluation per year. DNR shall review the facility's testing protocol, the testing results reports and will submit written critiques of the joint stack test observation to the Local Program within 30 days of receipt of the test results.

2. DNR shall notify the Local Program once the Stack Test Database has been established and identify the tools available to the Local Program for their use of the database.

5.2.4.4 Variances

1. DNR shall accept variances granted in the manner described in Section 5.1.4.4.

2. DNR shall notify the Local Program of any SIP requirements that may be impacted by the issuance of a variance.

5.2.4.5 Emission Data

1. Assessment of reports. DNR shall, upon request by the Local Program, assist in the assessment of any emission source testing reports submitted by firms within the Local Program's jurisdiction and serve as expert witnesses in the field of emission source testing, should the need arise.

2. CEM. Upon request, DNR shall provide technical assistance to the Local Program in evaluating continuous emission monitoring systems (CEM) and will aid in establishing review procedures consistent with those used by DNR.

5.2.5 Air Quality Monitoring Provisions

1. Network changes. DNR shall submit written justification for any proposed monitoring network change, which they initiate. DNR shall consider Local Program resources when proposing monitoring network changes.

2. EPA concurrence. DNR shall respond in writing, within one (1) month of receipt, to all monitoring network change justifications submitted by the Local Program. DNR shall be responsible for obtaining all necessary EPA concurrence for network changes.

3. Equipment. Within budget limitations, DNR shall assist in the repair, replacement and evaluation of monitoring equipment and monitoring sites.

4. Laboratory Services. DNR shall be responsible for payment of analytical laboratory services as indicated in Table 2.

5.2.6 Emergency Episodes

1. Upon notification of an emergency episode by the Local Program, or determination of an episode by the DNR, the DNR shall take the appropriate emergency actions provided for in 567 IAC Chapter 26 and in accordance with Iowa Code chapter 455B.

2. DNR shall immediately notify the Local Program of any air pollution emergency conditions that DNR determines to exist.

5.2.7 Intergovernmental Cooperation

1. Program development. To assure uniform adoption of emissions inventory, PSD, and operating permit application procedures DNR shall:

a) Provide the Local Program with inventory and application forms and data entry formats employed by DNR,

b) Participate in the development of public workshops and other educational projects.

2. Program changes. In addition to the assistance and cooperation noted regarding specific issues above, the DNR shall make every effort to keep the Local Program informed of state and federal developments, which may affect the program.

3. State Implementation Plan (SIP) submittal. DNR shall submit SIP amendments for Local Program administrative rules and SIPs in relation to NAAQS exceedances.

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM **17** **DECISION**

TOPIC **2015 Contract with Polk County Air Quality Division: Air Pollution Control in Polk County**

Recommendations:
Commission approval is requested for a one year-service contract with the county government of Polk County; Des Moines, Iowa. The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $902,166. This contract is an Iowa Code Chapter 28E contract.

Funding Source:
The statutory authority for the DNR to enter into this contract is 455B.145. This contract will be funded by cost reimbursable payments from Title V program fees (not to exceed $711,128), 105 federal grant dollars (not to exceed $171,038), and 103 federal grant dollars (not to exceed $20,000). Polk County has a funding commitment of $239,836.

Background:
Under Iowa Code § 455B.134 (11) and Iowa Code § 455B.144 local political subdivisions are able to address air quality problems in their jurisdictions and can establish their own rules. Polk County had a local program, including ordinances and enforcement, in place prior to the DNR's delegation from EPA for an air program.

As specified in Iowa Code § 455B.145 and 567 Iowa Administrative Code (IAC) Chapter 27, the Polk County Air Quality Division meets the conditions necessary to retain a local program. As established under the requirements of this contract, the Polk County Air Quality Division is responsible for the ongoing implementation of an air program within their county.

Purpose:
The parties propose to enter into this contract to specify the extent and manner of cooperation between the two agencies in conducting programs for the abatement, control, and prevention of air pollution within Polk County. Particular emphasis is placed on the collection and assessment of information regarding air quality, the permitting of sources of air emissions, the enforcement of emission limits, and the attainment and maintenance of ambient air quality standards.

Contractor Selection Process:
The DNR is allowed to contract with Polk County without using a competitive selection process pursuant to state law.

Contract History:
Records indicate that DNR has been contracting with Polk County for implementation of an air program within Polk County since at least 1994. The contract is renegotiated annually with Polk County to provide services that allow for the ongoing implementation of an air program.

In comparison to last year (SFY 2014), the contract currently being requested for approval has the same scope of work. The DNR's budget contribution increased by $18,846 (Title V program fees). The majority of the budget increase ($13,846) is due to personnel & fringe benefit increases; the remaining $5,000 is for a specific training necessary for a piece of monitoring equipment.

Christina Iiams
Program Planner 2
Air Quality Bureau – Environmental Services Division
June 17, 2014

Attachment(s): Special Conditions for Contract 14ESDAQBCIiam-0002

SPECIAL CONDITIONS

Section 5 STATEMENT OF WORK – RESPONSIBILITIES OF THE PARTIES

5.1 The responsibilities of the Local Program shall be to perform the following tasks. Projects or activities not in accordance with Section 5.1 shall not be conducted with the resources provided for in this Contract unless written approval is granted by the DNR in advance. The Local Program shall complete its obligations under this Contract by the Task Milestone Dates set out in Section 5.1.6.

5.1.1 Program Management Provisions

5.1.1.1 Personnel

1. Personnel commitment. The Local Program represents that it has or will acquire all personnel required for the performance of the work specified under this Contract and 567 IAC 27.4(1) "c". Staffing requirements are specified in Table 1 below.

Table 1: Staffing Requirements

Position	FTE
Air Quality Division Manager	1.05
Air Permit Engineer	2.00
Ambient Air Monitoring Specialist	3.00
Air Quality Specialist	2.00
Air Quality Administrative Support Staff	1.00
Total FTE	**9.05**

Knowledge, skills, and ability requirements for Local Program staff are as identified below.

a) Visible emissions observers. The Local Program shall have at least two (2) staff members certified in visible emission observation as specified in 567 IAC Chapter 29.

b) Dispersion modeling personnel. The Local Program shall have at least one (1) staff member trained in conducting air dispersion modeling. Personnel with modeling responsibilities shall demonstrate during DNR audits and in construction permit review documentation, an adequate knowledge of:

1) Current EPA and DNR procedures, policies, and guidance related to dispersion modeling;

2) Techniques and methods used to perform or review air dispersion modeling analyses;

3) Air dispersion model output data and its use in determining compliance with the applicable ambient air quality standards; and

4) Strategies and/or control measures necessary to mitigate modeled exceedances of the applicable air quality standards.

c) Inspection personnel. Inspection personnel shall:

1) Maintain state visible observation certification;

2) Demonstrate an adequate understanding of the principles, practices, laws, procedures and control methods during joint inspections and through inspection documentation; and

3) Demonstrate an adequate understanding of the principles of and methods employed in:

a) Stack testing for the purpose of observing stack tests, and

b) Continuous emission monitoring for the purpose of monitor certification.

d) Monitoring personnel. Monitoring personnel shall demonstrate, during EPA and DNR audits and in monitoring program documentation, an adequate knowledge of, and ability to perform:

1) Monitoring operations;

2) Quality control and quality assurance methods; and

3) Standard operating procedures.

e) Permit review personnel. Permit review personnel shall:

1) Demonstrate an adequate understanding of the principles, practices, laws, procedures and control methods applicable to the determination of permit completeness, review of permit applications and the issuance of permits, particularly as they apply to the determination of:

a) Applicability of Prevention of Significant Deterioration (PSD) "synthetic minor" review;

b) Applicability of New Source Performance Standards (NSPS);

c) Applicability of Title V (Operating Permits); and

d) Applicability of Title I and section 112.

2) Demonstrate an understanding of stack testing methods and application, and the review of stack test results.

2. Personnel Qualification. All of the work and services required shall be performed by the Local Program and all personnel engaged in the work shall be fully qualified and shall be authorized under state and local law to perform such services.

3. Key Personnel. The following individuals are designated as key personnel:

a) Jeremy Becker (Air Quality Manager)

b) Brent Blanchard (Air Permit Engineer)

Individuals specified as "Key Personnel" are considered essential to the work and services to be performed. If for any reason substitution for a specified individual becomes necessary, the Local Program shall provide immediate written notification of such to the DNR. The Local Program shall provide the name and qualifications of the replacement individual.

4. Training. All permit writing, enforcement, and ambient monitoring personnel shall maintain familiarity with applicable air quality permitting, inspection, and monitoring procedures, techniques, and technologies by routinely attending pertinent EPA, DNR, or other public or private training classes. Attendance at Air and Waste Management Association (AWMA) and National Association of Clean Air Agencies (NACAA) conferences is encouraged. The Local Program shall submit to DNR a training plan for all permit writing, enforcement, and ambient monitoring staff. The training plan shall be submitted on an annual basis (as per Section 5.1.6) for DNR review and recommendation.

5. Personnel report. The Local Program shall submit a semi-annual report, per Section 6.3.4 of this Contract, containing the following information:

a) A summary, for each staff member working under this Contract, of how staff time was utilized, in full-time equivalent (FTEs) percentages, for the following program activities:

1) Minor Source Construction/Local Operating Permitting

2) Major Source Construction Permitting,

3) Title V Operating Permitting,

4) Program Development,

5) Ambient Air Monitoring Quality Assurance,

6) Ambient Air Monitoring Field Operations,

7) Minor Source Compliance/Inspections,

8) Major Source Compliance/Inspections,

9) Training/Conferences,

10) Administration & Management,

11) Minor Source Air Dispersion Modeling, and

12) Major Source Air Dispersion Modeling

Totals shall be provided for each category; and

b) A training summary to include dates, training provider/sponsor, location, and names of staff who attended.

6. Personnel Changes. The Local Program may make personnel changes, which include but are not limited to promotions, transfers, and terminations, during this Contract, provided the total FTE requirements indicated in Table 1 are maintained and the provisions of Section 5.1.1.1/3 regarding key personnel are followed. The Local Program shall submit, no later than ten (10) working days from the effective date of a personnel change, date of change, a report containing the following information:

a) The changes in personnel, including the staff name, position before/after the changes, personnel and benefit amounts, and effective date of the changes; and

b) Identification of work products being affected by the change and how and when the work products will be completed.

7. New Personnel. For new hires, the Local Program shall submit, no later than ten (10) working days from the start date of the new hire, a report containing the following information:

a) The new staff member's name, position, and personnel and benefit amounts,

b) A new employee background summary, including name of the employee and a description of their education and experience; and

c) A special training schedule to be used for training the new employee.

8. Personnel plan. By January 15, 2015, the Local Program shall submit to DNR a staffing plan for the period of July 1, 2015 through June 30, 2016. This plan should document current utilization of staff time, as categorized above, and propose and explain any changes to the current utilization.

5.1.1.2 Fiscal Reporting

1. Budget. By January 15, 2015, the Local Program shall submit to the DNR the dollar per square foot rental rate and proposed salary and non-salary itemized budgets for the period of July 1, 2015 through June 30, 2016. If requested by the DNR, the Local Program shall include a written justification for the proposed budget items. The Local Program may use the current Contract's responsibilities and shall use line items, as provided in Section 5.1.1.2/2, to assist in establishing the draft budget. Any new responsibilities or requests should include a written justification for the proposed budget item.

2. Expenditure Reports. The Local Program shall report expenditures of State Grant funds and the Local match quarterly, per Section 7.5 of this Contract. At a minimum, the expenditure reports shall contain the following line item descriptions. The Local Program may incorporate additional sub items as are reflected in their actual accounting practices with written approval by the DNR.

Expenditure Category	**STATE CONTRIBUTION NOT TO EXCEED**	**105 FG NOT TO EXCEED**	**Title V NOT TO EXCEED**	**103FG NOT TO EXCEED**	**OVERALL TOTAL (including LP Match)**
Personnel (1)	**764,065**	**144,147**	**599,918**	**20,000**	**963,358**
Travel/Training (2)	**3,813**	**750**	**3,063**	**0**	**5,000**
Supplies (Total) (3)	**8,358**	**1,666**	**6,692**	**0**	**10,750**
Vehicle Operation & Maintenance	5,209	1,038	4,171		6,700
Gas & Vehicle Repairs	5,209	1,038	4,171		6,700
Office Supplies & Equipment	3,149	628	2,521		4,050
Stationary & Forms	778	154	624		1,000
Data Processing Supplies	194	39	155		250
Central Store Charge/Misc.	194	39	155		250
Furniture & Safety Equipment	389	78	311		500
A/V Equipment	39	8	31		50
PC Equipment	1,555	310	1,245		2,000
Other (Total) (4)	**15,450**	**3,000**	**12,450**	**0**	**20,000**
Lease/Maintenance Agreement	463	90	373		600
Utilities (phone, electric)	10,815	2,100	8,715		14,000
Postage, Printing, Reproductions	3,708	720	2,988		4,800
Contract Carriers	464	90	374		600
Miscellaneous Other	0	0	0		0
Equipment (Total) (5)	**69,281**	**13,389**	**55,892**	**0**	**89,700**
Engineering & Scientific Equipment	50,241	10,465	39,776		66,200
Repair & Maintenance of Equipment	10,047	1,051	8,996		11,650
Repair & Maintenance	5,047	1,051	3,996		6,650
Vendor Training	5,000	0	5,000		5,000
Data Processing Equipment	7,538	1,570	5,968	0	9,932
Lab Supplies	1,455	303	1,152	0	1,918
Indirect charges	**41,199**	**8,086**	**33,113**		**53,194**
Total	**902,166**	**171,038**	**711,128**	**20,000**	**1,142,002**

3. Unobligated Title V Funds. Annually, the DNR shall reduce the unobligated Title V fund balance by 3,964 square feet times the current square foot rental rate.

5.1.1.3 Initial Contract Review

By March 15, 2015, the Local Program shall submit to DNR comments and changes proposed to the draft Contract, for the period of July 1, 2015 through June 30, 2016, to include any deletions, revisions, and additions. Justification shall be provided for any change in the draft Contract.

5.1.1.4 Fiscal Final Contract Review

By April 30, 2015, the Local Program shall submit to DNR any comments of the final draft Contract.

5.1.1.5 Information Technology

1. Web Site. The Local Program shall continue to develop and maintain a website to disseminate information regarding the air program. The Local Program website shall be reviewed, at a minimum, on a quarterly basis and updated as needed, or as directed by DNR.

a) For projects that require "updates", the Local Program shall submit, in accordance with the schedule identified in Section 6.3.2, a quarterly report to the DNR Project Manager. The following shall be included in the quarterly report:

1) Activities completed to meet the deliverables;

2) A description of any obstacles that may delay timely completion of each respective work item; and

3) The number of hours to complete each deliverable.

2. The Local Program shall ensure that its website includes real-time ambient air monitoring data within the requirements established in Section 5.1.5.1/5.

3. Web site Planning. By January 15, 2015, the Local Program shall submit to the DNR a proposed website fiscal year plan for the period of July 1, 2015 through June 30, 2016. The plan shall include:

a) Identification of the Local Program's current website deficiencies or problems;

b) A description of how the Local Program will address the deficiencies or problems, including all deficiencies or problems as identified in writing by the DNR;

c) A process for continual maintenance of the website during the period of July 1, 2015 through June 30, 2016; and

d) A budget proposal, for SFY 2016.

5.1.1.6 Legal Authority

1. Enforcement. The Local Program is authorized to enforce Chapter V of the Polk County Rules and Regulations within Polk County. The Local Program is further authorized to fulfill its responsibilities under the Clean Air Act and Iowa Code Chapter 455B.

2. Polk County Rules. The Local Program shall update Chapter V of Polk County Rules and Regulations to be no less stringent than federal and state statutes and rules, including NSPS and NESHAP regulations. The Local Program shall provide:

a) A thirty-day public comment period and public hearing, as required by 40 CFR 51.102, to allow for federal approval of the rule amendments. The thirty-day comment period must occur prior to any final action by the Polk County Board of Supervisors taken pursuant to the provisions of Iowa Code section 331.305;

b) Public notice by publishing the notice in a local newspaper;

c) The DNR, prior to final action by the Polk County Board of Supervisors, a compilation of public comments and the County's response to all comments to any interested party; and

d) The DNR and U.S. Environmental Protection Agency (EPA), Region VII with a copy of the rule amendments prior to the conclusion of the comment period.

3. The Local Program shall confer with the DNR on the need, content and timing of revisions and updates to Chapter V of the Polk County Rules and Regulations by January 1, 2015, to ensure the Polk County rules are no less stringent than federal and state statutes and rules, including NSPS and NESHAP regulations. If the Local Program or DNR determines that revisions or updates to Chapter V are necessary, the Local Program shall initiate revisions and updates to Chapter V no later than June 15, 2015. "Initiate" shall be defined in this article as having proposed the first notice of rules.

5.1.1.7 Minority and Women Business Enterprise (MBE/WBE)

The Local Program shall submit a quarterly MBE/WBE report to the DNR, per Section 5.1.6 of this Contract, on Standard Form 5700-52A. For instances where there is no information to submit, the Local Program shall correspond via electronic media to the DNR Project Manager that there are no items to report.

5.1.1.8 Intergovernmental Cooperation

1. EPA grants. The Local Program shall submit such information as DNR may require for demonstration of compliance with EPA grant output requirements.

2. Semi-Annual Meetings. Commencing with beginning performance of this Contract, the Local Program and DNR shall meet semi-annually to discuss:

a) Progress toward the development and implementation of a comprehensive statewide air quality program, and national and state air quality priorities and issues; and

b) Progress made by the Local Program during the performance of this Contract.

As agreed upon by the parties, additional meetings may occur. Representatives of each agency shall be present. The meetings shall occur, either in person or by telephone conference call. Meetings may be postponed only on a case-by-case basis by mutual written agreement of the parties.

3. SIP assistance. The Local Program shall also provide, within Local Program budget, legal and jurisdictional limitations, such other assistance as DNR may request in order to implement the State of Iowa Air Pollution Implementation Plan (SIP).

5.1.2 Construction Permitting Provisions

5.1.2.1 Source review

The Local Program shall review all proposed new emission units and modifications to existing sources of air pollution.

5.1.2.2 Permit issuance

Local Program issuance of construction and operating permits for all new or altered equipment capable of emitting air contaminants into the atmosphere shall neither:

1. Result in a violation of applicable portions of the control strategy (as provided in 40 CFR Part 52, Subpart Q), nor

2. Interfere with the attainment or maintenance of a national ambient air quality standard (NAAQS) (determined by application of appropriate EPA Guideline air quality model or equivalent review).

5.1.2.3 Permit/Modeling Procedures

1. The Local Program shall utilize the procedures described in the latest version of the DNR Construction Permit Manual, check-sheets and forms (or approved equivalents), and EPA Guidelines. For modeling, the Local Program shall, at a minimum, utilize the procedures and guidance described in the latest version of the DNR's "Air Dispersion Modeling Guidelines for Non-PSD, Pre-Construction Permit Applications" and the "Air Dispersion Modeling Checklist for Non-PSD Construction Permit Applications".

2. Modeling Meetings. If requested by the Local Program and/or the DNR, the two parties shall meet to discuss modeling issues. The Local Program technical staff involved in ambient air modeling shall be present. This meeting will focus on DNR modeling guidance, procedures/checklists and their application, and specific questions related to conducting and review of dispersion modeling.

5.1.2.4 Permit transfer

1. The DNR has pre-approved classes of sources based on the agreement of permit content for that class of source. This pre-approval includes tanks, generators, paint booths at minor sources, and modifications for administrative corrections and changes in stack characteristics. Such approval shall remain in effect until such time as the permit content changes.

2. The Local Program shall transfer directly for DNR review, any construction permit applications for any new or major modifications[1] of existing PSD major facilities within Polk County; and any projects that trigger review under the provisions of Section 112(g) of the Clean Air Act.

5.1.2.5 Permit content

Draft construction permits submitted pursuant to Section 5.1.2.4 shall include:

1. Potential to emit calculations;

2. A statement specifying the Local Program's determination of the applicable regulation(s) for permit issuance;

3. Documentation of any measures used to avoid major Prevention of Significant Deterioration (PSD) source review;

4. Predicted actual emission calculations; and

5. Language in accordance with requirements set out in 567 IAC 22.3(3); which are the conditions for approval.

5.1.2.6 Referrals

Construction permit applications for any proposed new major PSD air pollution source or for any major modifications at any existing major PSD source shall be referred to DNR for review and permit issuance determination.

5.1.2.7 Data Management

[1] Major modification means any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any regulated pollutant.

1. The Local Program shall submit to the DNR, via electronic media, quarterly Excel reports containing construction permitting information and updates. These reports shall include the following information:

a) Source name;
b) Source location;
c) AFS ID number;
d) Emission unit description;
e) Emission point identification;
f) Date application received;
g) Date permit issued;
h) Major pollutants emitted;
i) Type of permit issued (i.e. new, modification, as-built, synthetic minor); and
j) Primary standard industrial classification codes.

If desired, the Local Program may also update the Air Facility System (AFS) with construction permitting information in addition to the excel spreadsheet identified above.

5.1.3 Title V Permitting Provisions

5.1.3.1 Title V Permit Activities

1. Permit review. Upon receipt or notification by the DNR, the Local Program shall review all permit applications for Title V Operating Permits submitted for facilities located within Polk County.

2. Permit application processing and draft permit content. The Local Program shall process the permit applications and prepare draft permits following the guidelines specified in 567 IAC 22.107, 22.108, and 22.110-116, including all of the elements specified in Section 5.1.3 of this Contract. The Local Program shall use the DNR's review manual and review check sheet as an aide in the process of drafting permits.

5.1.3.2 Permit Application Review

1. Permit application completeness.

a) The Local Program shall develop and maintain a protocol for determining application completeness. This protocol shall be employed in the review of all permit applications for operating permitting.

b) The Local Program shall, within 60 days of application receipt or notification by the DNR, make a completeness determination on the application and issue to the applicant a notice of whether the application is complete.

2. Permit application. The Local Program shall process permit applications in accordance with requirements set out in 567 IAC 22.107 and as specified in this Contract.

a) Prioritization of review. The Local Program shall review the permit applications in accordance with the priority schedule established in 567 IAC 22.107(1)"c."

b) If, while processing an application that has been determined to be complete, the Local Program determines that additional information is necessary to evaluate the application, the Local Program shall request from the source, in writing, such information and set a reasonable deadline for a response.

3. Decision to deny a permit application. If the Local Program judges that a permit application should be denied, the Local Program shall notify DNR as soon as possible. The notification to DNR shall include a summary of the basis of the decision and a copy of all information relevant to the decision including a chronology of any requests for additional information and other relevant correspondence with the source.

4. Performance expectation. The Local Program shall draft for issuance or denial a minimum of four (4) initial or renewal Title V Operating Permits, annually. Consistent with the allocation of effort for this activity (1 FTE), deviation from this minimum performance expectation in order to address priority DNR projects may be negotiated with the agreement of both parties.

a) Schedule. No later than May 15, 2015, the Local Program shall submit to the DNR, via electronic media, a proposed schedule that identifies what Title V Operating Permits the Local Program intends to issue during the period of July 1, 2015 through June 30, 2016. The schedule shall include, but is not limited to:

1) Facility Name;
2) Title V Permit Number;
3) Type of Permit (renewal or initial);
4) EIQ number;
5) IDNR Facility number;
6) AIRS number; and
7) Months since Issued Date.

Any changes to the proposed schedule shall be submitted to the DNR within thirty (30) days of revision.

b) Quarterly Status Report. In accordance with Section 5.1.6 of this Contract, the Local Program shall submit to the DNR a quarterly status report of Title V Operating Permits being drafted for issuance by the Local Program for the period of July 1, 2014 through June 30, 2015. The status report shall include, but is not limited to:

1) Facility Name;
2) Title V Permit Number;
3) Type of Permit (renewal or initial);
4) EIQ number;
5) Name of Staff Member working on the permit;
6) Stage of Review (may include, but not limited to: facility follow-up/information gathering, facility review, DNR review, public notice; or submitted to DNR for issuance) and date to be completed;
7) Identification of any problems/obstacles with the permit; and
8) Identification of being able to meet the issuance requirements identified in Section 5.1.3.2/4.

5.1.3.3 Permit Content

The Local Program shall prepare draft permits in accordance with 567 IAC 22.108 including but not limited to the items listed below.

1. Enforceable emission limitations and standards. Each draft permit shall include emissions limitations and standards, including those operational requirements and limitations that ensure compliance with all applicable requirements at the time of permit issuance as defined in 567 IAC 22.108(1).

2. Permit duration. The draft permit shall specify a fixed term not to exceed five years except:

a) Draft permits for Title IV affected sources shall have a fixed term of five years.

b) Draft permits prepared for solid waste incineration units combusting municipal waste subject to standards under section 129(e) of the Act shall have a term not to exceed 12 years. Such permits shall be reviewed every five years.

3. Monitoring.

a) Each draft permit shall contain the requirements with respect to monitoring as set forth in 567 IAC 22.108(3). Each draft permit shall include monitoring requirements no less stringent than those required in the applicable requirement, applicable Compliance Assurance Monitoring (CAM) requirements, or in the guidelines established in accordance with "b)" below, whichever is more stringent.

b) The Local Program shall, where the applicable requirement does not require periodic testing or instrumental or non-instrumental monitoring (which may consist of record keeping designed to serve as monitoring) or CAM requirements, establish protocols (consistent for each type of process or control) for periodic monitoring sufficient to yield reliable data for the relevant time period that are representative of the source's compliance with the permit.

1) The Local Program shall compile such protocols as established for the purposes of "b)" above, and establish a guideline showing generally acceptable monitoring practices for certain types of air pollution control equipment. These guidelines should represent a minimum standard. The guideline shall include all equipment types included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

4. Record keeping.

a) Each draft permit shall contain the requirements with respect to record keeping as established in 567 IAC 22.108(4). Each draft permit shall include record keeping requirements no less stringent than those required in the applicable requirement or in the guidelines established in accordance with "b)" below, whichever is more stringent.

b) The Local Program shall establish protocols, in concert with those established for monitoring, (consistent for each type of process or control) for record keeping which meet the requirements of 567 IAC 22.108(4) and are sufficient to ensure that the data collected will ensure the use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. The protocols shall ensure that the data required for record keeping must be reliable for the relevant time period that are representative of the source's compliance with the permit [as required in 567 IAC 22.108(3)(*Monitoring*)].

1) The Local Program shall compile such protocols and establish a guideline showing generally acceptable record keeping practices for certain types of air pollution control equipment. These guidelines should represent a minimum standard. The guideline shall include all equipment types

included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

5. Reporting.

a) Each draft permit shall contain the requirements with respect to reporting as established in 567 IAC 22.108(5) where applicable. Each draft permit shall include reporting requirements no less stringent than those required in the applicable requirement or in the guidelines established in accordance with "b)" below, whichever is more stringent.

b) The Local Program shall compile a guideline establishing acceptable reporting frequencies for activities requiring reporting. These guidelines should represent a minimum standard. The guideline shall include all equipment types included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

6. Risk management plan. If the source is required to develop and register a risk management plan (RMP) the draft permit shall state the requirement for submission of the plan. The permit shall also require filing the plan with appropriate authorities and an annual certification to the DNR that the plan is being properly implemented. The Local Program shall ensure RMPs are submitted to the local emergency planning committee.

7. Incorporating allowances. The Local Program shall ensure that the draft permit incorporates provisions, when applicable, which prohibit emissions exceeding any allowances that the affected source lawfully holds under Title IV of the Act or the regulations promulgated there under. Each draft permit shall meet permit requirements with respect to emissions as required by 567 IAC 22.108(7) where applicable.

8. Severability clause. The draft permit shall contain a severability clause to ensure the continued validity of the various permit requirements in the event of a challenge to any portions of the permit.

9. Other provisions required to be listed in the draft permit.

a) The draft permit shall contain provisions establishing those conditions established in 567 22.108(9).

b) The Local Program shall develop a guideline establishing minimum standards for the operation and maintenance of pollution control equipment sufficient to determine continued operation of such equipment necessary to maintain compliance with applicable requirements. The guideline shall include all equipment types included in any draft permits made available for public comment. The Local Program shall provide DNR with a copy of the guideline upon request.

10. Fees. The draft permit shall include a provision to ensure that the permittee pays fees and supplies all annual emissions reports to the DNR pursuant to 567 IAC 22.106.

11. Emissions trading. A provision of the draft permit shall state that no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the draft permit.

12. Operating Scenarios. Terms and conditions for reasonably anticipated operating scenarios identified by the source in its application and which are approved by the Local Program shall be incorporated into the draft permit if requirements established in 567 IAC 22.108(12) and other related requirements are met.

13. Terms and conditions of trading emissions increases and decreases. Terms and conditions of trading emissions increases and decreases shall be included in the draft permit if they meet the conditions and requirements established in 567 IAC 22.108(13).

14. Federally enforceable requirements. The draft permit shall meet requirements as established in 567 IAC 22.108(14).

15. Compliance requirements. All draft permits shall contain the elements with respect to compliance as established in 567 IAC 22.108(15).

16. Emergency provisions. All draft permits shall contain the elements with respect to emergency situations as established in 567 IAC 22.108(16).

17. Permit shield. As provided in 567 IAC 22.108(18) the draft permit shall include those provisions, as applicable, with regard to permit shields.

18. Permit reopening. The Local Program shall include provisions in the draft permit specifying the conditions under which the permit may be reopened and revised prior to the expiration of the permit. A permit shall be reopened and revised under the circumstances indicated in 567 IAC 22.108(17) and 22.114.

5.1.3.4 Preparation of a draft permit and fact sheet

The Local Program shall prepare a draft permit and a fact sheet. The Local Program shall provide the fact sheet to any other person who requests it. The fact sheet shall include:

1. The rationale for issuance or denial of the permit;

2. A brief description of the type of facility;

3. A summary of the type and quantity of air pollutants being emitted;

4. A brief summary of the legal and factual basis for the draft permit conditions, including references to applicable statutes and rules;

5. A description of the procedures for reaching final decision on the draft permit including the comment period, the address where comments will be received, and procedures for requesting a hearing and the nature of the hearing; and

6. The name and telephone number for a person to contact for additional information.

5.1.3.5 Permit Review by DNR

1. The Local Program shall provide DNR with the draft permit and fact sheet as soon as practical. Once the draft permit has been reviewed and any objections have been resolved, then the draft permit shall be provided to the facility for review.

2. Conveyance of proposed permit to DNR. The Local Program shall convey to DNR by electronic media or hard copy the following for all draft permits:

a) Copy of the draft permit and fact sheet in *Microsoft Word*.

b) All correspondence (in *Microsoft Word*) generated by the Local Program with regard to the permit, including but not limited to:

1) Completeness review and results, and

2) Requests made by the Local Program for additional information and the response.

5.1.3.6 Facility Review

The Local Program shall provide the facility no more than 30 days to review the draft permit prior to the start of the public comment period.

5.1.3.7 Permit review by EPA

1. Transfer of draft permit. The Local Program shall provide EPA with a copy of the draft permit at the start of the public comment period.

2. Response to EPA comments. The Local Program shall formulate a draft written response to written objections submitted by EPA if those objections are received within 45 days of EPA receipt of the draft permit. The draft written response to EPA shall be submitted to DNR no later than 45 days from receipt of the objections if the objection has not been resolved.

5.1.3.8 Public notice and public participation

1. Public notice. The Local Program shall provide public notice and an opportunity for public comments, including an opportunity for a hearing, before recommending to DNR any of the following actions: issuance, denial or renewal of a permit; or significant modification or revocation or reissuance of a permit.

2. Mailing list. The Local Program shall establish and maintain a mailing list for the distribution of public notices. The Local Program shall include DNR and EPA, Region VII, on the mailing list.

3. Publication and availability of notice. Notice shall be given by publication in a newspaper of general circulation in the area where the source is located or in a state publication designed to give general public notice. Notice also shall be given to persons on a mailing list developed by the Local Program, including those who request in writing to be on the list. The Local Program may use other means if necessary to ensure adequate notice to the affected public. The public notice shall include the following:

a) Identification of the Title V source;

b) Name and address of the permittee;

c) Name and address of the permitting authority processing the permit;

d) The activity or activities involved in the permit action;

e) The emissions change involved in any permit modification;

f) The air pollutants or contaminants to be emitted;

g) The time and place of any possible public hearing;

h) A statement that any person may submit written and signed comments, or may request a public hearing, or both, on the proposed permit. A statement of procedures to request a public hearing shall be included;

i) The name, address, and telephone number of a person from whom additional information may be obtained; and

j) Locations where copies of the permit application and the proposed permit may be reviewed, including the closest department office, and the times at which they shall be available for public inspection.

4. Public comment period. At least 30 days shall be provided for public comment. Notice of any public hearing shall be given at least 30 days in advance of the hearing.

5. Public hearing. Any person may request a public hearing. The Local Program shall hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. A public hearing may also be held at the Local Program's or the Director's discretion.

6. Response to comments. The Local Program shall keep a record of the comments and of the issues raised during the public participation process and shall prepare written responses to all comments received. The Local Program shall revise the draft permit in response to comments made during the comment period if the Local Program determines that modifications to the draft permit are warranted. The record of persons commenting, issues raised and the written responses shall be conveyed to the DNR with the final draft permit. The Local Program shall not make the written responses or subsequent changes to the draft permit public until the time that the DNR makes a final decision on the permit.

5.1.3.9 Final Permit Issuance

1. Changes to the draft permit. Subsequent to fulfilling all requirements for public notice, hearings and review by EPA, the Local Program shall incorporate those changes, as it deems appropriate into the proposed permit.

2. Conveyance of proposed permit to DNR. The Local Program shall convey to DNR by electronic media or hard copy the following for all final proposed permits:

a) The final proposed permits in *Microsoft Word*.

b) All correspondence (in *Microsoft Word)* generated by the Local Program with regard to the permit, including but not limited to:

1) Completeness review and results;

2) Requests made by the Local Program for additional information and the response;

3) Copy of all comments made during the comment period, including comments made by EPA if submitted during the comment period; and

4) The Local Program's response to written and oral comments made during the comment period by the public or by EPA.

5.1.3.10 Reopening issued Title V permits

1. Reopening. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. The Local Program shall reopen permits under the circumstances listed in 567 IAC 22.114(1) "a-e."

2. Public notice. The Local Program shall issue a notice of intent to the Title V source at least 30 days in advance of the date the permit is to be reopened, or as established under the authority defined in 567 IAC 22.114(3).

3. Proposed determination. Within 75 days of receipt of a notice from the administrator that cause exists to reopen a permit, the Local Program shall forward to the DNR a proposed determination of termination, modification, revocation, or reissuance of the permit, as appropriate. The submission to DNR shall include all elements as required for initial final draft permit submittal.

5.1.3.11 Title V permit renewals

The Local Program shall renew Title V permits using the same procedural requirements that apply to initial permit issuance, including those for public participation and review by EPA.

5.1.3.12 Emissions Data

1. The Local Program shall, within the staffing and funding limitations specified in this Contract, conduct emissions inventory audits as identified by DNR to insure accurate and appropriate emission estimates are provided by air pollution sources.

2. The Local Program shall, within seven (7) days of determination of errors or missing data, request corrections or additional information from those facilities for which the emissions inventory submittal is determined to be flawed.

3. The Local Program shall notify the DNR upon receipt and determination of acceptability of the requested inventory information. The Local Program shall transmit to the DNR any corrected hard copy documentation provided by the facility for DNR data entry into SPARs and filing in the DNR Records Center.

5.1.3.13 Permit Changes

The Local Program shall process any permit changes to valid Title V permits as follows:

1. Changes allowed without a Title V permit revision: 567 IAC 22.110;

2. Administrative amendments to Title V permits: 567 IAC 22.111;

3. Minor Title V permit modifications: 567 IAC 22.112; and

4. Significant Title V permit modifications: 567 IAC 22.113.

5.1.3.14 Data Management

The Local Program shall work with the DNR to determine:

1. Training needs of the Local Program staff to complete their job functions using the operational SPARS web-enablement program; and

2. Accessibility, logistics, and security measures that need to be evaluated to ensure that the Local Program is able to complete work using the SPARS program.

5.1.3.15 Intergovernmental Cooperation

In order to assure uniform adoption of emissions inventory and operating permit application procedures the Local Program shall:

1. Adopt the inventory and application forms and data entry formats employed by DNR**;** and

2. Participate in the development of public workshops and other educational projects**.**

5.1.4 Compliance and Inspection Provisions

5.1.4.1 Compliance

1. Local Program. The Local Program has the primary responsibility for conducting the air pollution control program within Polk County. Nothing in this Contract, however, shall constitute (or be construed to constitute) a valid defense by regulated parties in violation of any local, state or federal statute, regulation or permit.

2. Compliance status. The Local Program shall routinely track, evaluate, and document the compliance status of major, synthetic minor, and minor facilities within Polk County.

3. Violations. The Local Program shall identify violations and initiate appropriate and timely enforcement actions as follows:

a) High Priority Violations. The Local Program shall determine if the violation should be classified as a High Priority Violation (HPV), as outlined in the December 22, 1998, EPA policy, The Timely and Appropriate (T&A) Enforcement Response to High Priority Violations. If the violation meets the qualification of a HPV, the Local Program shall issue a notice of violation (NOV) within sixty (60) days of designating a violation as an HPV. The violation shall be resolved and/or addressed by no later than 270 days after this designation is made.

b) Other Violations. If the violation does not meet the criteria for a HPV, the Local Program shall compile documentation within thirty (30) days of the date the violation was discovered and shall issue an NOV or other correspondence within sixty (60) days of the date of this date.

c) The Local Program shall resolve and/or address all violations (including HPVs) by taking at least one or more of the following actions:

1) Issuance of an NOV or other correspondence containing an outline of corrective action(s) which, if accomplished, will achieve compliance with the applicable provisions of the Polk County Rules; or

2) Issuance of a compliance schedule or an emission reduction program; or

3) Issuance of a fine (or other financial penalty as appropriate); or

4) Issuance of a unilateral or consent order with or without a fine (or other financial penalty as appropriate); or

5) Referral to the County Attorney, Board of Supervisors, DNR, or EPA.

d) The Local Program shall copy the DNR on all NOVs or other correspondence for sources as described in Section 5.1.4.5/1 a-f, all follow-up correspondences, all demands for payment, fine issuances, order issuances, and referrals to the County Attorney.

4. Compliance schedules. Compliance schedules for major, synthetic minor, and minor facilities within Polk County shall be conveyed to the DNR via hard copy or electronic media.

5. Noncompliance penalties. As part of unilateral or consent orders, the Local Program shall inform the source of noncompliance penalties contained in Section 120 of the Clean Air Act, as amended, and Iowa Code § 455B.131-.149.

6. PSD/DNR permits. For Construction or PSD permits issued by DNR for sources within Polk County, upon notification by DNR of initial compliance with the permit, the Local Program shall assume ongoing source inspection responsibilities.

7. Title V permits. For Title V permits issued by DNR for facilities within Polk County, the Local Program shall assume ongoing facility inspections, compliance, and evaluation responsibilities.

8. State enforcement. The DNR shall handle the enforcement for PSD and Title V applicability issues. Also, DNR shall handle the enforcement for Title V fee payment and the emission inventory. Once DNR permits are issued, the Local Program shall handle the enforcement of the permits. In all cases where compliance

with DNR issued permits cannot be achieved in a timely and appropriate manner through enforcement of Local Program restrictions, the Local Program shall forward all documentation to DNR for state enforcement action.

5.1.4.2 Stack tests

The DNR and the Local Program shall jointly conduct a minimum of one (1) stack test observation and evaluation during the period of performance. The joint observation will include review of the facility's testing protocol, attendance at any pre-test meeting, observation of the stack test, and review of the testing results. The DNR and Local Program will mutually agree upon which stack test will be jointly observed and evaluated.

5.1.4.3 Inspections

1. Schedule. The Local Program shall, at a minimum, conduct inspections according to the plan submitted to EPA under EPA's Clean Air Act Stationary Source Compliance Monitoring Strategy, September 2010 and the following:

a) Complaints/"Problem" facilities take priority over inspection;

b) Compliance assistance visits shall be scheduled by the Local Program with the affected facility. Inspections shall be conducted in an unannounced manner except in cases where facility key personnel are unavailable or the facility is not operating and a return visit is needed to conduct the inspection;

c) NESHAP Facilities (for standards identified 567 IAC 23.1(3) and (4)), Area Source NESHAP facilities shall receive a compliance assistance visit[2], upon initial identification, to ensure new and existing facilities are aware of the promulgated NESHAPs and their responsibilities under such standard;

d) Portable Sources shall be inspected annually;

e) New Minors shall receive a compliance assistance visit to ensure they are aware of air quality regulations;

f) Existing Minors shall be inspected following issuance of new construction permit or conditional operating permit; and

g) The Local Program shall be observant of facilities that are not inspected and/or have unpermitted sources.

2. Joint inspections. At a minimum, two (2) compliance inspections of facilities (2 major source) within the Local Program's jurisdiction shall be conducted jointly by staff of DNR and the Local Program during the Contract's time of performance. The facilities to be inspected shall be mutually agreed upon by the Local Program and DNR, Field Office #5. Prior to the joint inspection, the Local Program shall submit or make available to Field Office #5 the following: copies of the applicable permits, the previous inspection report, and other pertinent data. In addition, within 30 days following the joint inspection, the Local Program shall submit to Field Office #5 a copy of the completed field sheet and NOV or other correspondence, if applicable.

5.1.4.4 Variances

1. Issuance. The Air Pollution Manager, or designee, may issue a variance[3] for sources within Polk County in accordance with Article XIII of Chapter V of the Polk County Board of Health Rules and Regulations. The Local Program must, at a minimum, copy DNR on all burn permits that would constitute a variance from state rules.

2. Training Fires. Prior to issuance of a training fire permit, the Local Program shall inform the training agency of the requirements to submit an Asbestos NESHAP notification to DNR, as required by 567 IAC Paragraph 23.2(3) "g." This can be done by stating the requirement to submit a notification to the DNR and by providing the name and number of the state asbestos NESHAP contact on each training fire permit issued. The Local Program shall copy DNR, at the time of issuance, on all training fire permits issued.

5.1.4.5 Data Management

1. Compliance Monitoring Strategy (CMS) Flags. No later than September 1, 2014, the Local Program shall send to the DNR the CMS plan that identifies facilities intended to be inspected during SFY 2015.

a) Any changes to the CMS plan, which would include the adding or the removal of flags, shall be submitted to the DNR within thirty (30) days of revision.

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[2] A compliance assistance visit is a tool to disseminate information on what the facility needs to do to come into or remain in compliance.

[3] Each open burning permit issued for items other than those exempted by 567 IAC Subrule 23.2(3) shall constitute a variance.

2. AFS reporting. Per Section 6.3.1 of this Contract, the Local Program shall update AFS, and submit via electronic media a copy of the summary of facility actions to the DNR, on a monthly basis with compliance and enforcement information concerning federally reportable sources. Updates and transfer of information shall meet the minimum data requirements and codes specified in the most recent version existing on the first day of each month that the report is required of EPA's AFS Business Rules Compendium, plus any data elements negotiated with EPA's Region VII. Monthly updated information may include, but is not limited to:

a) Major facilities; and
b) Synthetic Minor facilities; and
c) Part 61 NESHAP Minor facilities; and
d) Other facilities identified within the CMS Evaluation Plan; and
e) Any facility with a formal enforcement action; and
f) Any facility with an active HPV.

3. Quarterly Reports. The Local Program shall submit quarterly reports for compliance actions, inspections and variances for minor, major, and non-point sources during each quarter to the DNR, per Section 6.3.2 of this Contract. The report shall contain the following information:

a) Name of facility;
b) Facility address;
c) Type of compliance action (if applicable);
d) Reason for compliance action, inspection or granting variance;
e) Type of source or materials burnt;
f) Rule citation; and
g) Local Program contact.

5.1.4.6 Emissions Data

1. Source testing. The Local Program shall observe emission tests or require emissions testing as provided for in the Polk County Rules. Any emission test performed within Polk County as a determination of compliance for existing sources shall be consistent with federal reference methods. The results of such tests shall be reported to EPA through AFS.

2. Records. The Local Program shall retain reports of excess emissions for all principle emission points at major, synthetic minor, and minor facilities in accordance with 567 IAC Chapter 24.

5.1.5 Ambient Air Monitoring Provisions

5.1.5.1 Monitoring Network

1. Network Modifications.

a) Scheduled Network Modifications. The Local Program shall operate the monitoring network indicated in Table 2, with the modifications shown in Table 3. Sampling frequencies are as indicated in Table 2 and 3.

b) Unscheduled Network Modifications. The Local Program, upon request, shall work with the DNR to add or remove monitoring sites as requested by the DNR. Changes shall be negotiated and agreed upon in writing between DNR's monitoring contact and the Local Program.

2. Equipment Procurement. The Local Program shall coordinate equipment purchases with the DNR in order to maintain the existing network and accomplish network modifications.

a) Final Equipment List. By July 1, 2014, the Local Program shall submit a list of equipment it intends to purchase with funds as identified in the Section 5.1.1.2/2 budget, item 5. The items on this list shall be mutually agreed upon (as per Section 5.1.5.3/3a and b) by the DNR and the Local Program.

b) Revision of Equipment List. Changes to the final equipment list shall be negotiated and agreed upon in writing between the DNR's monitoring contact and the Local Program.

3. Monitoring Sites. The Local Program's monitoring network shall meet or exceed the minimum specification set indicated in Appendices D and E of 40 CFR 58.

4. Daily Polling. The Local Program shall poll its continuous monitors each day and issue immediate reports to DNR as described in Section 5.1.5.4/6a. The Local Program shall archive short term data from all continuous monitors in order to validate the associated hourly averages.

5. Real-time Monitoring. The Local Program shall post all continuous ambient monitoring data (including collocated monitoring data) to EPA's AIRNOW website. In addition, the Local Program shall post all continuous ambient data to the Local Program's website, along with up to date Air Quality Index reports. The Local Program shall update its real-time monitoring QAPP and SOPs to insure that all real-time monitoring data is complete and accurate.

6. High Concentration Reports. The Local Program shall designate an individual on its staff to be on standby status with remote paging capability during off hours in order to respond to high level reports generated by ESC data loggers at its continuous monitoring sites. When these levels indicate a likely exceedance of ambient health thresholds, the staff member shall evaluate the validity of the data. If the data is determined to be suspect or invalid, the staff member shall suspend real time posting of the data. If the data is determined to be valid, then the staff member shall supply notifications of high concentrations as indicated in the Local Program QAPP.

TABLE 2: Existing Air Monitoring Network

Site	Parameter	# of Monitors	Sampling Frequency
Des Moines, Polk Co. Health Dept. Building at 19th & Carpenter	Trace CO	1	Continuous
	Trace SO_2	1	Continuous
	Toxics (canisters and carbonyl cartridges)	1	For Canisters Every 12th Day. For Carbonyl Cartridges, Every 6th Day Inside Ozone Season, and Every 12th Day Outside Ozone Season.
	PM-10	2 (collocated site)	Every 3rd Day, Collocated every 6th Day
	$PM_{2.5}$ (FRM)	2 (collocated site)	Every Day Collocated every 6th Day
	$PM_{2.5}$ (BAM)	2 (collocated site)	Continuous
	$PM_{2.5}$ (Speciation includes additional nylon filter sampling)	1	Every 6th Day
	$PM_{2.5}$ (Speciation) URG 3000N Carbon Channel	1	Every 6th Day
	MET (including temperature and humidity)	1	Continuous
	O_3 (with daily auto-calibration)		
	NO_x	2 (collocated back-up)	Continuous – (Seasonal)
		1	Continuous
Des Moines, Near Road NO_2, 6011 Rollins Avenue	NOx	1	Continuous
Slater (Story Co.)	O_3 (with daily auto-calibration)	2 (collocated back-up)	Continuous – (Seasonal)
	MET	1	Continuous
West Des Moines, Indian Hills Jr. High	$PM_{2.5}$ (FRM)	1	Every 3rd Day
	PM-10	1	Every 3rd Day

TABLE 3: Monitoring Network Modifications

Change	Description	Date Due
Discontinue	Discontinue speciation sampling at Polk Co. Health Dept. (all channels of Met One SuperSASS and URG3000N)	12/31/2014

5.1.5.2 Quality Assurance

1. Quality System. The Local Program shall develop and implement an EPA Quality System to assure the quality of its air monitoring activities. The Quality System developed by the Local Program shall be completely autonomous from that of DNR. For autonomy, the Local Program has the responsibility for developing procedures and oversight sufficient to demonstrate that the environmental data generated meets the requirements of EPA and/or DNR. The Local Program Quality System shall include:

a) Development and implementation of a Quality Management Plan (QMP) according to EPA guidance document QA/R-2;

b) Development and implementation of Quality Assurance Project Plans (QAPPs) consistent with EPA guidance document QA/R-5; and

c) Development and implementation of Standard Operating Procedures (SOPs) for operation of air monitoring equipment, data handling, and other repetitive procedures consistent with QA/G-6. The QAPP/SOP shall be modified as indicated in the QMP/QAPPs to remain current with EPA requirements outlined in 40 CFR Part 58, the current edition of EPA's Quality Assurance Handbook for Air Pollution Measurement Systems ("the Redbook"), and applicable EPA guidance. The Local Program shall designate members of its Air Monitoring Staff as QAPP/SOP reviewers. As part of the annual network review, the final SOPs shall be approved by the designated Quality Assurance Officer (QAO) or Air Quality Manager (AQM). A complete set of QMP/QAPPs/SOPs for all air monitoring activities shall be submitted to DNR and EPA in hardcopy and in PDF format as a component of the annual review of air monitoring activities.

2. Revision of Quality Assurance Documents. Substantive revisions of the Local Program's QMP/QAPPs/SOPs require approval of DNR and EPA. Except as otherwise indicated within this Contract, QAPP/SOP revisions shall be submitted to EPA/DNR within forty (40) working days following:

a) Promulgation of new monitoring rules or procedures by EPA; or

b) Written notification of a deficiency in procedures by EPA/DNR.

QAPPs/SOPs for new equipment shall be submitted to EPA/DNR in accordance with deadlines established in Contract Section 5.5.11 Special Conditions. The Local Program shall not initiate data collection without an associated QAPP/SOP.

3. Prevention of Significant Deterioration Ambient Monitoring Sites. Within 30 days of DNR's written request the Local Program shall review and provide written comments on the standard operating procedures and quality assurance plans, associated with the PSD ambient monitoring projects within the Local Program's jurisdiction. The DNR may request Local Programs to perform (quarterly) site audits of facility-run PSD ambient monitoring sites at specified PSD facilities. These site audits are to be performed in accordance with Appendix A of 40 CFR Pt. 58. Within two (2) weeks following the site audit, the Local Program shall provide, in writing, the audit results and any recommendations for corrective actions to both DNR and the field staff operating the PSD site(s). To ensure that the data gathered at PSD monitoring sites meets EPA acceptance criteria for completeness, precision and accuracy, and to establish format compatibility with EPA's Air Quality System (AQS) database, the Local Program shall provide quality assurance reviews on ambient monitoring data generated by facility-run PSD monitoring sites, as specified by DNR. The number of PSD monitoring sites shall be limited to no more than four (4) sites per year.

4. External Audits. The Local Program shall participate in EPA's National Performance Audit Program (NPAP), performance evaluation program (PEP) for $PM_{2.5}$ monitoring, and EPA technical systems audits (TSA's). In addition, the Local Program shall participate in quality assurance systems audits conducted by the State Hygienic Laboratory (SHL). The Local Program shall fund at least one annual NPAP audit for all monitors for which NPAP audit devices are available. The Local Program shall respond promptly to address deficiencies identified in these audits.

5. Annual Network /Quality Assurance Review. By March 15, 2015, the Local Program shall complete and submit to DNR an annual network/quality assurance review for calendar year 2014 in order to demonstrate that its quality system is sufficiently developed, and its monitors are appropriately sited and adequate in number to meet EPA's minimum requirements. In addition, the Local Program shall review its AQS/PARS data and site/monitor parameters in the AQS database for errors during calendar year 2014, and generate graphical and statistical summaries of the data. The Local Program shall evaluate the data relative to EPA acceptance criteria for data completeness, precision and accuracy. On the basis of this review, the Local Program shall submit its annual SLAMs certification letter. The Annual Network/Quality Assurance review shall contain the following components and the review shall be submitted to the DNR via both hard copy and electronic media. Any emails shall contain in the subject line a specific reference to the applicable Section 5.1.6 obligation.

a) A complete, current set of Quality assurance documentation (QMP/QAPPs/SOPs);

b) AQS/PARS raw data listings generated from the AQS system [AQS QA Raw Assessment Report (AMP 251), AQS Raw Data (AMP 350)] for all monitors operated by the Local Program during calendar year 2014;

c) Graphs of concentration vs. time (and concentration vs. wind direction where applicable) for all monitors operated by the Local Program during calendar year 2014;

d) Complete, current network review checklists to document conformance with 40 CFR Part 58 Appendix E requirements;

e) An annual quality assurance report following the example contained in Volume II, Appendix I, of EPA's Quality Assurance Handbook for Air Pollution Measurement Systems (rev 12/10/08);

f) An annual State and Local Air Monitoring Stations (SLAMS) report consisting of an AMP 600 and 450NC along with a letter certifying the accuracy of the report based on a review of all materials contained in the annual review; and

g) A report from the quality assurance manager indicating the results of an audit comparing the procedures actually used by the field operators to operate and maintain air monitoring equipment with the written standard operating procedures for the equipment. In the event that discrepancies exist between the actual and written procedures, the report shall detail these discrepancies, establish the validity of the data gathered with the undocumented procedures, and update standard operating procedures, where necessary, to reflect actual field practice.

6. Quality Assurance FTE Commitment. The Local Program shall maintain 0.40 FTE for Quality Assurance activities. The Local Program shall dialogue with the DNR prior to the reallocation of Quality Assurance FTEs. This FTE allocation (0.40) shall be apportioned from and shall not be in addition to the FTEs specified in Section 5.1.1.1, Table 1.

5.1.5.3 Network Planning

1. Quarterly Coordination Meetings. The Local Program shall participate in quarterly coordination meetings for technical and management staff involved in the ambient air monitoring program. The technical meeting will focus on data collection, transmission and quality assurance issues and trends. The management meeting will focus on the status of the work products contained in the Contract and strategic planning issues.

2. Inventory and Inventory Reporting. The Local Program shall maintain a complete and current list of all equipment in its air monitoring network purchased in full or in part with state or federal funding, including the location, description of equipment type, model number, serial number, ownership agency, and both DNR and the Local Program inventory tag number. The Local Program shall record in the equipment inventory the installation date for equipment newly installed in the air monitoring system. Equipment purchased by the DNR for use by the Local Program shall be included on its equipment inventory. The Local Program shall supply the DNR a copy of the up to date equipment inventory within seven (7) days of a request by the DNR.

3. Development of the Equipment Procurement List for the Next Contract Period.

a) By January 15, 2015, the Local Program shall submit for DNR review:

1) A list of anticipated equipment purchases needed to maintain and operate its existing air monitoring network during the next Contract period; and

2) A multi-year replacement schedule for air monitoring equipment. To develop this schedule, the Local Program shall consider the age and condition of the current instruments, as well as the maintenance requirements and capabilities of current instruments relative to new instruments.

b) By March 15, 2015, the Local Program shall submit for DNR review a list of anticipated equipment purchases needed to expand its air monitoring network during the next Contract period.

c) The above mentioned lists shall contain monitoring equipment or monitoring quality assurance equipment that the Local Program intends to procure with funds designated for this purpose under this Contract as identified in Section 5.1.1.2/2, budget item 5.

4. Network Modifications. The Local Program shall work with the DNR to ensure that network modifications are made according to 40 CFR Pt. 58, Subpart B.

5.1.5.4 Data Management

1. Data Validation. Data obtained from ambient monitors shall be validated as specified in the approved QAPP and in this scope of work.

2. Site Setup and Closure in AQS. The Local Program shall be responsible for opening and closing sites and monitors in the AQS database for its reporting organization, and for its monthly data uploads. The Local Program shall notify the DNR when it closes sites or monitors in the AQS database.

3. AQS/PARS Data Submission. Validated monitoring data (AQS data) and precision and accuracy data (PARS data), for all monitors, shall be uploaded by the Local Program staff monthly, in accordance with Section 5.1.6 (Ambient Air Monitoring) of this Contract. To expedite data generation by SHL, the Local Program shall provide validated sampler run data at the same times integrated samples are submitted to SHL for laboratory analysis. If $PM_{2.5}$ data from the SHL laboratory has not been received before the scheduled monthly upload, it shall be entered at the next scheduled monthly upload. The Local Program shall inform the DNR via e-mail after completing its monthly data upload. In the event that the monthly data upload is not complete, the Local Program shall indicate by mail or e-mail the reason for the backlog and the anticipated date when the backlogged data will be uploaded.

4. Data Screening. To prevent data coding errors, the Local Program shall lock data for upload only after the screening file passes all AQS system edits (Edit Error Details, Scan Report, and Stat Evaluation). The Local Program shall archive a copy of any data uploaded to AQS immediately before locking the data for upload.

5. Recordkeeping Requirements.

a) Monthly AQS Recordkeeping Requirements. On a monthly basis, the Local Program shall run and review the AQS QA Raw Assessment Report (AMP 251) and AQS Raw Data Report (AMP 350) to determine the completeness and accuracy of the AQS and PARS data uploaded by the Local Program to the AQS system.

b) Quarterly AQS Recordkeeping Requirements. On a quarterly basis, the Local Program shall:

1) Run and review the AQS QA Data Quality Indicator Report (AMP 256) to evaluate the PARS data uploaded by the Local Program;

2) Run and review the AQS Data Completeness Report (AMP 430) in order to evaluate the quarterly data completeness of the monitors operated by the Local Program; and

3) Run and review the AQS Site Description Report (AMP 380) in order to evaluate the accuracy and completeness of the site setup parameters of the monitors operated by the Local Program.

6. Reporting Requirements. The Local Program shall submit regular reports to DNR as identified below. Reports shall be submitted to the DNR via both hard copy and electronic media. Any emails shall contain in the subject line a specific reference to the applicable Section 5.1.6 obligation. Monthly and quarterly reports shall contain an executive summary where the data is compared to the applicable acceptance criteria, and in the event that the acceptance criteria are not met, a corrective action plan. All reports shall be reviewed and certified by the quality assurance manager. All corrective action plans shall be reviewed and certified by the quality assurance manager. Expenditures associated with corrective action plans shall be reviewed and certified by the program manager.

a) Immediate Reports. The Local Program shall notify DNR immediately upon identification of any exceedance of an ambient air quality standard, emergency episode or potential emergency episode (as defined in 567 IAC 26.2); or exceedance of any other pollutant threshold provided in writing by the DNR.

b) Weekly Network Status Report. The Local Program shall transmit a written report of the status of air monitoring systems to DNR on the first working day of every week. This report will address the following items with respect to monitoring completed each week. For each site that is modified or for which data are missed, the report shall include:

1) Date of last valid data;

2) Date inoperative condition detected;

3) Cause of inoperative condition;

4) Step(s) taken to correct condition; and

5) Date and time data collection resumed (if applicable), and expected date data reporting will resume (if applicable).

c) Monthly Report for Continuous Monitors. The Local Program shall submit a monthly report to DNR in accordance with Section 6.3.1 of this Contract. This report will include a list of fixed station air monitoring sites in operation during the report period, and for each station:

1) A copy of the NOAA F-6 Report from the internet titled – Preliminary Local Climatological Data;

2) PARS-data reduction for precision;

3) NAAQS Exceedances including: the number and exceedances of ambient air quality standards, the number of emergency episodes or potential emergency episodes, and the number of exceedances of pollutant thresholds;

4) Pollutant Data Summaries including: a listing of all sampling that was omitted or invalidated because of equipment failure, calibration, zero and span checks, sample handling accidents, laboratory accidents or failure of the operator to collect samples; the type and number of equipment failures, and the percentage of total possible samples which were translated into valid air quality data including data from primary and collocated samplers;

5) Precision Summaries including: the dates of PARS precision and accuracy checks; an explanation for precision checks that occur with a separation greater than 2 weeks for both primary and collocated samplers;

6) ESC Parameter report including graphs of the data;

7) Raw AQS string data in either hard copy or electronic media;

8) Corrective Action Report Forms; and

9) A performance evaluation of the "Smart Heaters" on the BAM 1020 $PM_{2.5}$ monitor(s).

d) Monthly Reports for data generated by outside contractors: SHL-$PM_{2.5}$ and PM_{10} FRM, SHL-Air Toxics, and RTI-$PM_{2.5}$ Speciation. The Local Program shall submit a report to the DNR fifteen (15) working days upon receiving data from each outside contractor. Reports will include:

1) Documentation of the dates data were received from outside contractors and submitted to DNR;

2) NAAQS Exceedances including: the number and exceedances of ambient air quality standards, the number of emergency episodes or potential emergency episodes, and the number of exceedances of pollutant thresholds;

3) Pollutant Data Summaries including: a listing of all sampling that was omitted or invalidated because of equipment failure, calibration, zero and span checks, sample handling accidents, laboratory accidents or failure of the operator to collect samples, the type and number of equipment failures, and the percentage of total possible samples which were translated into valid air quality data;

4) Precision and Accuracy Summaries for $PM_{2.5}$ FRM, PM_{10} FRM, and toxics including the dates of these checks; and an explanation for checks that occur off-schedule.

5) PARS-data reduction for Precision of $PM_{2.5}$ and PM_{10} FRM;

6) Raw AQS string data of $PM_{2.5}$ and PM_{10} FRM;

7) Data Summary for $PM_{2.5}$ Speciation and Air Toxics including: results from monthly flow verification, results of leak checks, list of flagged/voided data;

8) Excel Spreadsheet of raw data received from SHL or RTI including results from data validation tests ($PM_{2.5}$ Speciation); and

9) Corrective Action Report Forms.

e) Monthly Equipment Procurement Report. The Local Program shall submit a monthly report to the DNR which itemizes monitoring equipment purchases. This report shall include:

1) A description of the equipment, the quantity purchased;

2) The cost per unit and total cost, the dates the items were ordered and received; and

3) A running total of all expended equipment funds during the Contract period.

f) Quarterly Monitoring Report. The Local Program shall submit a quarterly report to DNR in accordance with Section 5.1.6 of this Contract. For data received from outside contractors (SHL-$PM_{2.5}$ and PM_{10} FRM, SHL-Air Toxics), quarterly reports will be submitted 30 working days upon receiving the data. For data received from outside contractors (RTI-$PM_{2.5}$ Speciation), quarterly reports will be submitted 30 working days after RTI has submitted the data to the AQS website. This report shall include a list of fixed station air monitoring sites in operation during the report period, and for each station:

1) Pollutant Data Summaries including: a listing of all sampling that was omitted or invalidated because of equipment failure, calibration, zero and span checks, sample handling accidents, laboratory accidents or failure of the operator to collect samples; the type and number of equipment failures, and the percentage of total possible samples which were translated into valid air quality data including data from primary and collocated samplers. In the event the percentages do not meet EPA completeness criteria, an explanation of the reasons for the insufficient data capture and a corrective action plan for the monitor;

2) AMP Reports: 430 and 251 generated from AQS;

3) Two AQS AMP 256 reports, one for the current quarter, and a cumulative AMP 256 covering all quarters since the previous data certification, along with an explanation of any deficiencies indicated in the report, and a corrective action plan to address any deficiencies;

4) The precision and accuracy for each primary and collocated continuous monitor calculated as specified in 40 CFR Pt. 58 App A;

5) The precision and accuracy for $PM_{2.5}$ FRM, $PM_{2.5}$ Speciation, PM_{10} FRM, and toxics monitors audited during the quarter, calculated as specified in 40 CFR Pt. 58 App. A;

6) A listing of all backlogged AQS or PARS data, the reason for the backlog, and the date when the backlogged data will be uploaded to AQS; and

7) Data Management Report Log for individual sites including: A records audit, conducted by the QA manager, listing monitoring records logged during the quarter and certifying compliance with the recordkeeping requirements of this Contract.

7. $PM_{2.5}$ Speciation Activities. The Local Program shall perform the following activities in support of the State's $PM_{2.5}$ speciation network:

a) Field Activities. The Local Program shall perform all field activities at speciation sites specified in this Contract including cyclone replacement, filter collection and transmission of sampler performance data to EPA's National Speciation Laboratory. In addition, the Local Program shall be responsible for the performance of all calibrations, audits, and routine maintenance for all $PM_{2.5}$ speciation monitors.

b) Data Validation and AQS maintenance. The Local Program shall work in cooperation with EPA's National Speciation Laboratory to set-up or shut down speciation sites in AQS and to validate speciation data.

c) Support of EPA Intensive Studies. When requested by DNR, the Local Program shall adopt an accelerated sampling frequency at its speciation sampling site for a period of up to one month.

8. Toxics Monitoring. The Local Program shall use SHL's analytical laboratory for toxics sample analysis. The Local Program shall be responsible for setting up or shutting down toxics sites in AQS, and shall validate toxics data in cooperation with the SHL laboratory. The Local Program shall upload the AQS strings provided by SHL into EPA's AQS database.

5.1.5.5 Special Projects

1. Security and backup of computers used for ambient monitoring. By September 1, 2014, the Local Program IT staff shall perform an audit to ensure that all computers used in the ambient monitoring network are secured and adequately "backed up".

2. Teledyne T700U gas calibrator training. The Local Program shall host a one-day training session conducted by instructors from Teledyne for T700U gas calibrators no later than July 31, 2014. The training shall cover topics such as routine operation, calibration of mass flow controllers, maintenance, and data processing.

5.1.6 Summary of Obligations. The following are obligations the Local Program shall complete to meet tasks identified in this Contract.

Obligation	Reference	Task Milestone Date
Program Management		
Personnel Changes	5.1.1.1/6	10 days from effective date
New Personnel Report	5.1.1.1/7	10 days from start date
Website – Review & Update As Needed	5.1.1.5/1	November 15, 2014
Website Quarterly Report (As Needed)	5.1.1.5/1a	November 15, 2014
MBE/WBE	5.1.1.7	November 15, 2014
Rule Revision (confer)	5.1.1.6/3	January 1, 2015
Proposed training plans	5.1.1.1/4	January 15, 2015
Personnel Plan	5.1.1.1/8	January 15, 2015
Proposed Budget	5.1.1.2/1	January 15, 2015
Website Plan	5.1.1.5/4	January 15, 2015
Personnel Report	5.1.1.1/5	February 15, 2015
Website – Review & Update As Needed	5.1.1.5/1	February 15, 2015
Website Quarterly Report (As Needed)	5.1.1.5/1a	February 15, 2015
MBE/WBE	5.1.1.7	February 15, 2015

Obligation	Reference	Task Milestone Date
Initial Contract Review	5.1.1.3	March 15, 2015
Final Contract Review	5.1.1.4	April 30, 2015
Website – Review & Update As Needed	5.1.1.5/1	May 15, 2015
Website Quarterly Report (As Needed)	5.1.1.5/1a	May 15, 2015
MBE/WBE	5.1.1.7	May 15, 2015
Rule Revision (initiate)	5.1.1.6/3	June 15, 2015
Personnel Report	5.1.1.1/5	August 1, 2015
Program Management cont'd		
Website – Review & Update As Needed	5.1.1.5/1	August 1, 2015
Website Quarterly Report (As Needed)	5.1.1.5/1a	August 1. 2015
MBE/WBE	5.1.1.7	August 1, 2015
Construction Permitting		
Excel Report (and AFS if desired)	5.1.2.7/1	November 15, 2014
Excel Report (and AFS if desired)	5.1.2.7/1	February 15, 2015
Excel Report (and AFS if desired)	5.1.2.7/1	May 15, 2015
Excel Report (and AFS if desired)	5.1.2.7/1	August 1, 2015
Title V Permitting		
Status Reports	5.1.3.2/4b	November 15, 2014
Status Reports	5.1.3.2/4b	February 15, 2015
Status Reports	5.1.3.2/4a	May 15, 2015
Issuance Schedule	5.1.3.2/4b	May 15, 2015
4 initial/renewal permits	5.1.3.2/4	June 30, 2015
Status Reports	5.1.3.2/4b	August 1, 2015
Compliance		
Compliance Submission to AFS	5.1.4.5/2	Monthly on 15th
Joint Inspection Schedule	5.1.4.3/2	Prior to each
Joint Inspection Report	5.1.4.3/2	30 days following each
CMS plan	5.1.4.5	September 1, 2014
Compliance Qtrly	5.1.4.5/3	November 15, 2014
Compliance Qtrly	5.1.4.5/3	February 15, 2015
Compliance Qtrly	5.1.4.5/3	May 15, 2015
Minimum 1 Joint Stack Tests	5.1.4.2	June 30, 2015
Compliance Qtrly	5.1.4.5/3	August 1, 2015
Ambient Air Monitoring		
Exceedence Report	5.1.5.4/6a	Immediate
Monthly Report: SHL-PM FRM Monthly Report: SHL – Air Toxics Monthly Report: RTI-Speciation	5.1.5.4/6d	15 days after receipt from outside contractor Speciation: 15 days after RTI has finished uploading data to AQS.
Weekly Network Status Report	5.1.5.4/6b	Weekly – 1st working day
Monthly Continuous Monitor Report	5.1.5.4/6c	Monthly on 15th
AQS/PARS Data Submission	5.1.5.4/3	Monthly on 15th
Monthly AQS Recordkeeping Requirements	5.1.5.4/5a	Monthly
Monthly Equipment Procurement Report	5.1.5.4/6e	Monthly
Qtrly AQS Recordkeeping Requirements	5.1.5.4/5b	Quarterly
Coordination Meetings	5.1.5.3/1	Quarterly
Final Equipment List	5.1.5.1/2a	July 1, 2014
Teledyne T700U Training	5.1.5.5/2	July 31, 2014
Qtrly Monitoring Report (Continuous)	5.1.5.4/6f	September 1, 2014
Computer audit (security and adequacy of backup)	5.1.5.5/1	September 1, 2014
Qtrly Monitoring Report (Continuous)	5.1.5.4/6f	December 1, 2014
Discontinue speciation at Polk Co. Health Dept.	Table 3	December 31, 2014

Obligation	Reference	Task Milestone Date
Ambient Air Monitoring cont'd		
List equipment to maintain & operate existing network	5.1.5.3/3a	January 15, 2015
Multi-year Replacement Schedule for air monitoring equipment	5.1.5.3/3a	January 15, 2015
Qtrly Monitoring Report (Continuous)	5.1.5.4/6f	March 1, 2015
Annual Network/Quality Assurance Review	5.1.5.2/5	March 15, 2015
List equipment to expand network (next Contract)	5.1.5.3/3b	March 15, 2015
Qtrly Monitoring Report (Continuous)	5.1.5.4/6f	June 1, 2015

5.2 The responsibilities of the DNR shall be to perform the following tasks.

5.2.1 Review of Local Program

1. Review of Rules. DNR shall review proposed changes to the rules, policies, and procedures of the Local Program for consistency with the Iowa Code and Iowa Administrative Code.

2. Program Audit. Biennially, the DNR shall audit the Local Program to document compliance with the Contract, specifically with Section 5.1 – Statement of Work, and to identify aspects of the program that either party should further improve. The DNR shall provide a draft written report of the audit to the Local Program within thirty (30) days of the audit. The DNR shall provide the final written report of the audit to the Local Program within ninety (90) days of the audit.

3. Training Plan Recommendations. By February 1, 2015, DNR shall provide the Local Program with any recommendations to the training plans as submitted. DNR shall provide written justification in conjunction with all recommendations.

4. Contract Planning. The DNR shall, with Local Program assistance, determine if a meeting should be held prior to January 15, 2015 to identify priorities and responsibilities being considered for the SFY 2016 Contract. DNR shall afford the Local Program an additional meeting as per Section 5.2.1/7.

5. Initial Draft Contract. By February 15, 2015, DNR shall submit to the Local Program the initial draft Contract for the period of July 1, 2015 through June 30, 2016. DNR shall provide written justification for any changes to the Contract.

6. Final Draft Contract. By April 15, 2015, DNR shall submit to the Local Program the final draft Contract for the period of July 1, 2015 through June 30, 2016.

7. Contract Negotiations. Annually, if requested by the Local Program and/or the DNR, the two parties shall meet to discuss final changes to the Contract.

8. Program Changes. The DNR shall submit information on significant changes to program requirements and staffing as a result of the DNR's audit of the Local Program within ninety (90) days of the audit.

5.2.2 Construction Permitting Provisions

1. Construction permit manual. DNR shall inform the Local Program of all updates or attachments to the construction permit manual during their development and transmit copies of these to the Local Program as soon as they are finalized.

2. PSD/Construction permit applications. On receipt of a complete application from the Local Program, DNR shall review the application for PSD and 112(g) applicability and will notify the Local Program within three (3) weeks of receipt as to the disposition. Should the Local Program request DNR review of a draft permit for PSD synthetic minor and federal NSPS and NESHAPS sources, the DNR will concur or object to the Local Program's draft permit within three (3) weeks of receipt.

3. Permit review. DNR shall review applications and issue construction permits for:

a) Major modifications to existing major PSD facilities;
b) New major PSD facilities; and
c) 112(g) sources.

4. Progress of review. DNR shall keep the Local Program informed of developments during this review. Upon request DNR shall review the associated dispersion modeling analyses and assess the impact on ambient air quality. DNR shall forward the results of such modeling back to the Local Program within three (3) weeks of receipt of an application or request from the Local Program, as resources allow.

5. Modeling meetings. If requested by the Local Program and/or the DNR, the two parties shall meet to discuss modeling issues. The DNR shall meet with Local Program technical staff involved in ambient air

modeling. The meeting will focus on DNR modeling guidance, procedures/checklists and their application, and specific questions related to conducting and review of dispersion modeling.

6. Technical assistance. Upon request, DNR shall provide technical assistance for review of other permit applications. This assistance may include conducting or reviewing dispersion modeling analyses associated with the permit applications. DNR shall forward the results of such modeling back to the Local Program within the time period agreed upon by the Local Program and DNR.

5.2.3 Title V Permitting Provisions

1. DNR shall convey to the Local Program one copy of any Title V Operating Permit Application received for any source operating within the Local Program's jurisdiction or notify the Local Program if the application is received in SPARS.

2. DNR shall review draft Title V operating permits and provide response within two weeks of submittal by the Local Program.

3. DNR shall issue Title V operating permits to Polk County facilities.

4. DNR shall provide the Local Program with one copy of each final permit after the permit has been issued.

5. Applications submitted to DNR, for the modification of permits issued for sources in the Local Program's jurisdiction, shall be conveyed to the Local Program for processing the same way as initial or renewal applications unless the modification applications are received in SPARS, in which case the Local Program shall be notified by the DNR of such submittals.

6. Issuance Schedule comments. DNR shall review and make initial comments on proposed issuance schedule submitted by the Local Program within seven (7) working days.

5.2.4 Compliance and Inspection Provisions

5.2.4.1 Compliance

1. DNR involvement. Except for DNR issued permits, DNR shall limit its involvement in compliance activities to Local Program audits as well as review and comment on proposed compliance schedules unless:

a) The Local Program specifically requests DNR involvement;

b) DNR determines that the Local Program's enforcement response is inappropriate or untimely (see Section 5.2.4.1/5); or

c) Emergency conditions (as prescribed in Iowa Code 455B.139) exist (see Section 5.2.4.1/6).

2. Compliance schedule comments. DNR shall review and make initial comments on proposed compliance schedules submitted by the Local Program within seven (7) working days. DNR shall provide written comments to the Local Program within twenty (20) days.

3. Local program compliance schedules. DNR shall recognize compliance schedules required by the Local Program in accordance with Chapter V of the Polk County Rules in lieu of granting a variance and approval of an emission reduction program by DNR under 567 IAC Chapter 21 for any source within the jurisdiction of the Local Program.

4. Compliance Monitoring Strategy (CMS) Flags. DNR shall data enter the CMS flags and any revisions to the CMS plan into the AFS system after receiving the information from the Local Program.

5. Review of AFS inputs. DNR will routinely review AFS inputs (as well as other compliance/enforcement information available to the DNR through audit activities and other sources) to determine if the Local Program is taking timely and appropriate action in response to noted violations.

6. Enforcement actions. DNR may initiate enforcement actions where specific Local Program actions regarding a specific individual set of circumstances are determined by DNR to not be timely or appropriate. DNR shall provide a written position with regard to the enforcement action and allow the Local Program a reasonable opportunity to act prior to initiating any DNR enforcement actions, except as provided in Items 6 and 7 below.

7. Emergencies. DNR shall notify the Local Program at the earliest possible time upon any determination of an emergency pursuant to Iowa Code 455B.139. As soon as the situation allows, DNR shall initiate discussions with the Local Program for the purpose of transferring mitigation efforts to the Local Program.

8. Enforcement by DNR. In cases where compliance with DNR issued permits is not achieved in a timely and appropriate manner through enforcement of Local Program restrictions, DNR shall initiate enforcement action to ensure compliance with DNR issued permits.

5.2.4.2 Inspections

During the Contract period, DNR shall conduct two (2) compliance inspections in conjunction with the Local Program. DNR shall review joint compliance inspection reports and will submit written critiques of jointly conducted inspections to the Local Program within two (2) weeks of receipt of the inspection report.

5.2.4.3 Stack tests

1. DNR shall coordinate with the Local Program in scheduling and conducting a minimum of one (1) joint stack test observation and evaluation per year. DNR shall review the facility's testing protocol, the testing results reports and will submit written critiques of the joint stack test observation to the Local Program within thirty (30) days of receipt of the test results.

2. DNR shall notify the Local Program once the Stack Test Database has been established and identify the tools available to the Local Program for their use of the database.

5.2.4.4 Variances

1. DNR shall accept variances granted in the manner described in Section 5.1.4.4.

2. DNR shall notify the Local Program of any SIP requirements that may be impacted by the issuance of a variance.

5.2.4.5 Emission Data

1. Assessment of reports. DNR shall, upon request by the Local Program, assist in the assessment of any emission source testing reports submitted by firms within the Local Program's jurisdiction and serve as expert witnesses in the field of emission source testing, should the need arise.

2. CEM. Upon request, DNR shall provide technical assistance to the Local Program in evaluating continuous emission monitoring systems (CEM) and will aid in establishing review procedures consistent with those used by DNR.

5.2.5 Air Quality Monitoring Provisions

1. Network changes. DNR shall submit written justification for any proposed monitoring network change, which they initiate. DNR shall consider Local Program resources when proposing monitoring network changes.

2. EPA concurrence. DNR shall respond in writing, within one (1) month of receipt, to all monitoring network change justifications submitted by the Local Program. DNR shall be responsible for obtaining all necessary EPA concurrence for network changes.

3. Equipment. Within budget limitations, DNR shall assist in the repair, replacement and evaluation of monitoring equipment and monitoring sites.

5.2.6 Emergency Episodes

1. Upon notification of an emergency episode by the Local Program, or determination of an episode by the DNR, the DNR shall take the appropriate emergency actions provided for in 567 IAC Chapter 26 and in accordance with Iowa Code chapter 455B.

2. DNR shall immediately notify the Local Program of any air pollution emergency conditions that DNR determines to exist.

5.2.7 Intergovernmental Cooperation

1. Program development. To assure uniform adoption of emissions inventory, PSD, and operating permit application procedures DNR shall:

a) Provide the Local Program with inventory and application forms and data entry formats employed by DNR,

b) Participate in the development of public workshops and other educational projects.

2. Program changes. In addition to the assistance and cooperation noted regarding specific issues above, the DNR shall make every effort to keep the Local Program informed of state and federal developments, which may affect the program.

3. State Implementation Plan (SIP) submittal. DNR shall submit SIP amendments for Local Program administrative rules and SIPs in relation to NAAQS exceedances.

5.2.8 Indirect Cost Assistance

Annually, the DNR shall reduce the unobligated Title V fund balance according to the information submitted in accordance with Section 5.1.1.2/3.

Environmental Protection Commission
Iowa Department of Natural Resources

ITEM **18** **DECISION**

TOPIC **2015 Contract University of Northern Iowa – Iowa Air Emissions Assistance Program (IAEAP): Small Business Assistance Program**

Recommendations:
Commission approval is requested for a one year-service contract with the University of Northern Iowa (UNI); Cedar Falls, Iowa. Services are to be provided by the Iowa Air Emission Assistance Program (IAEAP) of UNI's Iowa Waste Reduction Center (IWRC). The contract will begin on July 1, 2014 and terminate on June 30, 2015. The total amount of this contract shall not exceed $298,507.00. This contract is an Iowa Code Chapter 28E contract.

Funding Source:
The statutory authority for the DNR to enter into this contract is under Section 507 of the Clean Air Act and Iowa Code § 455B.133(8)(a). This contract will be funded by cost reimbursable payments funded solely by Title V program fees.

Background:
The Small Business Assistance Program, which is mandated by Section 507 of the Clean Air Act Amendments of 1990, provides technical and non-technical assistance to small businesses. This contract establishes the requirements of Iowa's technical assistance program.

Purpose:
The parties propose to enter into this contract to outline UNI's activities and projects related to providing technical assistance to Iowa's small businesses. Particular emphasis is placed on providing general education and outreach to assist small businesses in determining and understanding their regulatory obligations, and training small businesses on how to complete and submit emissions inventories.

Contractor Selection Process:
The DNR is allowed to contract with the University of Northern Iowa without using a competitive selection process pursuant to state law.

Contract History:
The Iowa Air Emission Assistance Program (IAEAP) was formally designated as the technical and compliance small business assistance provider in a State Implementation Plan revision that was submitted to and approved by the EPA in the early 1990s. The University of Northern Iowa's IAEAP has demonstrated itself to be an effective assistance provider to Iowa's small businesses.

In comparison to last year (SFY 2014), the contract currently being requested for approval has primarily the same scope of work. A few changes have been made to the "special work products" section of the contract; similar to other contract years, the DNR and UNI make changes to this section based on the needs for new outreach projects or other technical projects that may need UNI's expertise and assistance. The DNR's budget contribution went up by $3,377.00 - with the budget increase being due to personnel, fringe benefit, and indirect charge increases.

Christina Iiams
Program Planner 2
Air Quality Bureau – Environmental Services Division
June 17, 2014

Attachment(s): Special Conditions for Contract 14ESDAQBCIiam-0003

SPECIAL CONDITIONS

Section 5 STATEMENT OF WORK

5.1 The responsibilities of UNI shall be to perform the following tasks. Projects or activities, including solicitation of additional projects or activities, shall not be conducted with the resources provided for in this Contract unless written approval is granted by the DNR in advance. UNI shall complete its obligations under this Contract by the Task Milestone Dates set out in Section 5.1.19.

5.1.1 Personnel

1. Personnel Commitment. UNI represents that it has or will acquire all personnel required for the performance of the work specified under this Contract. Sufficient personnel shall be employed to perform the services of this Contract during the period of performance. Staffing requirements are specified in Table 1.

a) UNI shall employ two and one-half (2.5) full time equivalent (FTE) positions under this Contract. These two and one-half (2.5) positions shall be devoted to fulfilling the requirements of this Contract.

1) Two of the 2.5 FTE positions shall be "professional staff" positions of fulltime IWRC employees. The "professional staff" positions shall include any of the following: "Waste Reduction Specialist", "Environmental Specialist", and "Program Manager/Associate Director."

2) Half of one (.50) of the 2.5 FTE positions shall be "support staff" positions of fulltime IWRC employees. The "support staff" positions shall include any of the following: "Director", "Associate Director", "Office Coordinator", "Information Technology Specialist", and "Graphic Designer".

Table 1: Staffing Requirements

Position	FTE
Professional Staff	
Program Manager/Associate Director	0.55
Waste Reduction/Environmental Specialist	1.45
Support Staff	
Office Coordinator	0.10
Information Technology Specialist	0.20
Director	0.10
Graphic Designer	0.10
Total FTE	**2.50**

2. Personnel Qualification. All of the work and services required hereunder shall be performed by UNI and all personnel engaged in the work shall be fully qualified and shall be authorized under state and local law to perform such services.

3. Training. All professional staff shall maintain familiarity with relevant air quality regulations by:

a) Routinely completing training courses UNI deems beneficial to providing assistance small business.

b) Receiving training from DNR as required in writing by the DNR.

4. Key Personnel. The following individuals are designated as key personnel:

a) Dan Nickey, IAEAP Program Manager & Associate IWRC Director

b) Brian Gedlinske, Environmental Specialist

c) Jen Trent, Environmental Specialist

d) Jennifer Whittenburg, Environmental Specialist

e) Sue Behrns, Waste Reduction Specialist

Individuals specified as "Key Personnel" are considered essential to the work and services to be performed. If for any reason substitution for a specified individual becomes necessary, UNI shall, within ten business days, provide written notification of such to the DNR. UNI shall provide the name and qualifications of the replacement individual.

5.1.2 Fiscal Reporting.

1. Expenditure Reports. UNI shall report expenditures per Section 7 of this Contract. At minimum, the expenditure reports shall contain the following line item descriptions. UNI may incorporate additional sub items as are reflected in their actual accounting practices.

EXPENDITURE CATEGORY	OVERALL TOTAL
Personnel/Benefits (Total) – Not to Exceed	$256,720.00
Personnel (FTE)	$188,488.00
Benefits (FTE)	$ 68,232.00

Travel/Training (Total)	$ 11,000.00
Out of State	$ 3,000.00
In State	$ 8,000.00
Supplies (Total)	$ 4,300.00
Computer & AV Purchases	$ 2,500.00
General Supplies	$ 1,800.00
Equipment (Total)	0.00
Other (Total)	$ 4,375.00
Postage	$ 1,500.00
Printing	$ 2,500.00
Software License Fee	$ 250.00
Miscellaneous other	$ 125.00
Indirect charges	$ 22,112.00
Total Project Costs – Not to Exceed	**$298,507.00**

5.1.3 Data Management

1. General Database. UNI shall develop and maintain, for a minimum of three (3) years from the last date of modification, a database of small businesses contacted by UNI. The database shall include, but not be limited to, the following:

a) Company name;
b) Company address; and
c) Company phone number.

This database shall be used by UNI to collect summary statistics for the purposes of the reporting activities required by this Contract. If requested by the DNR, facility information as maintained in the database shall be provided to the DNR within twenty-four (24) hours, unless both DNR and UNI agree that Iowa Code section 455B.484A is applicable.

2. NESHAP Database. UNI shall continue to maintain databases, for a minimum of three (3) years from the last date of modification, created for the purpose of tracking facilities assisted for the following NESHAP:

a) Paint Stripping and Miscellaneous Surface Coating Operations (6H);
b) Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (6B);
c) Nine Metal Fabrication and Finishing Source Categories (6X); and
d) Prepared Feeds Manufacturing (7D)

As per Section 5.1.3/1, UNI shall provide information to the DNR as requested.

3. Toll-Free Telephone. UNI shall establish and operate a toll-free telephone line to provide free assistance to small business stationary sources. Repairs to the toll free-line are the responsibility of UNI.

4. Web Site. UNI shall maintain a web-site that describes services and assistance provided by the Iowa Air Emissions Assistance Program (IAEAP) and provides small business stationary sources with information on their obligations under CAAA. UNI shall ensure that:

a) The web-site and any links remain functional;
b) The web-site shall be reviewed, at a minimum, on a quarterly basis and updated as needed, or as requested by DNR.

5.1.4 Initial Contract

1. By January 15, 2015, UNI shall submit the following items to the DNR for the period of July 1, 2015 through June 30, 2016.

a) Workplan. UNI shall submit written justification for any proposed changes to the current work duties/responsibilities or staffing plan.

1) The work plan may propose any NESHAP assistance and compliance tool development projects identified by UNI. UNI shall include at least the following information in the detailed description of each proposed project:

a) Type of assistance;
b) Format for assistance;
c) Identify whether existing assistance or new assistance or tool development;
d) Identify UNI resources necessary to complete the assistance and development.

If NESHAP assistance and compliance tool development is not being recommended as a work product, the work plan shall identify that UNI is not considering any projects. UNI shall not proceed with the creation of any assistance or development project without specific written permission from the DNR.

b) Draft Budget. A draft salary and non-salary itemized budget. UNI shall use the current budget line items (Section 5.1.2/1) to assist in establishing the draft budget. If requested by the DNR, UNI shall include a written justification for the proposed budget items.

1) Salary items. UNI shall provide the following information for each staff member as it relates to necessary SFY 2015 salary changes for the budget.

a) Staff member's name,
b) Position title,
c) Personnel (salary) amounts; and
d) Benefit amounts

2. Review. By March 15, 2015, UNI shall submit to DNR comments and changes proposed to the draft Contract, for the period of July 1, 2015 through June 30, 2016. Review comments shall include any proposed deletions, revisions, and additions. Justification shall be provided for any change in the draft Contract.

5.1.5 Final Contract Review

1. By April 30, 2015, UNI shall submit to DNR any comments regarding the final draft Contract.

5.1.6 Addressing Concerns

1. UNI shall address any comments DNR may have on any financial, non-financial report or other work product within fifteen (15) days.

5.1.7 Documentation

1. UNI shall place the following statement on the cover page of all non-financial reports, including compliance assistance tools, or other informational material prepared pursuant to this Contract. This statement shall not be necessary on any quarterly or annual status reports submitted to DNR pursuant to this Contract, provided such reports are not also being used as part of a public information program.

a) The following language shall be included on all documents:

"This (document or tool) is intended solely as guidance, cannot be used to bind the Iowa Department of Natural Resources and is not a substitute for reading applicable statutes and regulations."

b) Any air quality compliance assistance tools funded in whole or in part by the DNR shall contain the following language:

"The publication of this (document or tool) has been funded in part by the Iowa Department of Natural Resources. This (document or tool) is intended solely as guidance, cannot be used to bind the Iowa Department of Natural Resources and is not a substitute for reading applicable statutes and regulations."

2. All of the information generated by the terms and conditions of this Contract shall become the property of the State of Iowa.

3. No document involving the small business assistance program created under the scope of this contract shall be withheld from the DNR by UNI.

5.1.8 Intergovernmental Cooperation

1. UNI shall collaborate, as needed, with the DNR–Air Quality Bureau, DNR-Pollution Prevention Services (P2), and the Small Business Liaison – Air Quality to develop and implement joint collaboration projects, evaluate the outcomes, and identify concerns.

2. In order to assure uniform adoption of emissions inventory procedures UNI shall participate in the development of public workshops and other educational projects, as needed**.**

3. Compliance Advisory Panel. Once the Compliance Advisory Panel (CAP) is functional, UNI shall provide assistance to the CAP as is required pursuant to section 507(e) of the federal Clean Air Act Amendments of 1990, 42 U.S.C. § 7661f.

5.1.9 Notice of Clean Air Act Rights

1. UNI shall ensure small business stationary sources receive notice of their rights under the Clean Air Act (CAA) in such a manner and form as to assure reasonably adequate time for such sources to evaluate compliance methods, and any relevant or applicable proposed or final state or federal regulation or standard.

5.1.10 Compliance Methods

1. UNI shall provide mechanisms for developing, collecting, and coordinating information concerning compliance methods and technologies for small business stationary sources, and programs and workshops as

needed to encourage lawful cooperation among such sources, and other persons to further compliance with the CAA.

5.1.11 Modification Requests

1. UNI shall assist DNR in the consideration of requests from small business stationary sources for the modification of any work practice or technological method of compliance, or the schedule of milestones for implementing such work practice or method of compliance preceding any applicable date, based on technological and financial capability of any such small business stationary source. Assistance shall include UNI communicating to the DNR any requests for modifications and shall participate in meetings, as requested.

5.1.12 Pollution Prevention

1. UNI shall provide mechanisms for assisting small business stationary sources with air pollution prevention and accidental release detection and prevention, including providing information concerning alternative technologies, process changes, products, and methods of operation that help reduce air pollution.

5.1.13 Rule Development

1. As necessary or requested by the DNR, UNI shall provide written comment during the rule development and promulgation of DNR air quality rules with emphasis on impacts to small business stationary sources. Written comments shall be provided within the timeframe requested by the DNR or, in the case of proposed rules, no later than the day public comment closes.

5.1.14 Compliance Assistance Tools and Outreach

1. Compliance Assistance Tool. "Compliance assistance tool" shall include, but shall not be limited to, any of the following items that are developed or distributed by IWRC and used to help small businesses comply with federal and/or Iowa air quality statutes, rules, or programs.

a) Plain language guides or guidance sheets upon publication of final rules that may have a significant impact on small business stationary sources;

b) Fact sheets or other explanatory documents that state or explain any aspect of the federal or Iowa air quality statutes, rules, or programs;

c) Training documents or manuals that state or explain any aspect of the federal or Iowa air quality statutes, rules, or programs; and

d) Computer applications or programs.

Assistance efforts and correspondence to specific businesses shall not be considered a compliance assistance tool.

2. Outreach. "Outreach" shall include, but shall not be limited to, face-to-face workshops, webinars, mailings, or presentations developed or distributed by IWRC and used to help small businesses comply with federal and/or Iowa air quality statutes, rules, or programs.

3. Development and Distribution. UNI shall comply with the following during the development and distribution of all compliance assistance tools and outreach:

a) UNI shall provide compliance assistance tools and outreach as requested by the facility or the DNR. UNI shall coordinate with the DNR to develop and distribute compliance assistance tools and outreach.

b) DNR and UNI shall meet, as requested by the DNR, to plan for compliance assistance tools and outreach, as necessary.

c) Should additional updates be required of any compliance assistance tools, UNI shall receive DNR approval prior to commencing updates.

d) Prior to distribution, UNI shall obtain DNR approval of any air quality compliance assistance tools or outreach funded by this Contract, to ensure the accuracy and consistency of air quality compliance assistance tools;

e) UNI shall also provide DNR the opportunity to review and comment on other air quality compliance assistance tools or outreach developed outside the scope of this Contract; and

f) Compliance tools and outreach shall be in accordance with the requirements of Section 5.1.7/1.

g) UNI shall provide the DNR with a final copy of all compliance assistance tools.

5.1.15 NESHAP

1. UNI shall coordinate with the DNR to evaluate the impact of new Area Source NESHAP (NESHAP) on existing Iowa small businesses, and assist those businesses in understanding and complying with NESHAP. If approved in advance by the DNR for each NESHAP, the coordination shall include:

a) Prioritization. UNI shall meet with the DNR to determine the need or level of assistance to provide to Iowa small businesses. Establishing priorities may include, but is not limited to the following factors:

1) Facility demographics;

2) Number of affected small businesses;
3) EPA established compliance dates;
4) Compliance requirements (i.e. work practices, control requirements); and
5) Current level of air regulation (i.e. existing permit knowledge, associations providing education)

b) Compliance Assistance Tools/Outreach. UNI shall coordinate with the DNR, as per Section 5.1.14, regarding the development of necessary compliance assistance tools and/or outreach.

5.1.16 On-Site Visits

1. UNI shall inform small business stationary sources of their obligations under the CAA, and shall provide on-site audits upon request or shall refer such a source to qualified auditors.

a) In accordance with the prioritization guidelines established by the parties in SFY 2011, UNI shall provide on-site reviews to businesses that meet the following criteria.

1) Qualify under the CAA Section 507 for assistance.
2) Have not been inspected within the last three months by the DNR.
3) There are no other compliance resources that are applicable (i.e. webinar or workshops).
4) The industry has a compliance deadline in the near future (i.e. facilities under area source rules).
5) As requested by DNR Air Quality management.

A business must meet the first two criteria for an on-site visit. A business that meets any additional criteria will receive higher priority.

5.1.17 Emission Inventory

1. UNI shall complete the following to provide assistance to small business stationary sources (as defined in Section 507 of the CAA) with complying with Minor Source Emissions Inventory (MSEIs) requirements.

a) Training. UNI shall provide training to small business stationary sources to ensure compliance with MSEI requirements. Training may be requested by the facility or the DNR. Training shall be conducted in a format that includes, but is not limited to face-to-face workshops, webinars, presentations, telephone or electronic conversations.

b) Planning Meeting. UNI shall meet with the DNR, no later than September 15, 2014 to determine the need and/or level of training assistance to provide to Iowa small businesses. Agenda for the meeting shall include:

1) Prioritization. Prioritization of which small businesses to train may include, but is not limited to the following factors:

a) Facility demographics;
b) Number of affected small businesses; and
c) Necessary MSEI Assistance Tool Development

2) Draft Training Proposal. Discuss ideas for the draft training proposal (Section 5.1.17/1c) as submitted by UNI;
3) Additional Items. Additional items, as determined by both parties shall be discussed as necessary.

c) Training Proposal. UNI shall provide the DNR with a proposal for conducting MSEIQ trainings to be completed by April 30, 2015.

1) The proposal shall identify, but is not limited to:

a) Number of trainings to schedule;
b) Formats to use for conducting the training;
c) MSEIQ assistance tools to be used or developed for use;
d) Summarized plan for training on electronic and hard copy submittal; and
e) Additional topics to cover during the proposed training dates.

2) Draft Proposal. A draft version of the training proposal shall be submitted to the DNR no later than November 3, 2014. DNR will have any comments on the draft proposal available to UNI by November 18, 2014.

3) Final Draft Proposal. No later than February 2, 2015, UNI shall submit a final draft proposal to the DNR.

a) The final draft shall include all DNR comments which were provided by November 18, 2014. DNR will have any comments or approval on the final draft proposal available to UNI by February 16, 2015.
b) The final draft shall not be published or incorporated until after written DNR approval of all items.

d) Compliance Assistance Tools/Outreach. As per Section 5.1.14, regarding the development and distribution of necessary compliance assistance tools and/or outreach, UNI shall:

1) Obtain DNR approval prior to distribution of any air quality compliance assistance tools or outreach funded by this Contract, to ensure accuracy and consistency;

2) Provide DNR with when and where the outreach is being held, the time of the event, and any other logistical information as necessary; and

3) Provide the DNR with a final copy of all materials used to conduct the workshops. Materials shall include but not be limited to PowerPoint presentations, handouts, calculations, and brochures.

e) Site Visits. Provide site visits, as determined necessary by UNI, to small business stationary sources required to complete a MSEIQ. UNI shall follow the prioritization protocol established in 5.1.16 for determining sites to visit.

5.1.18 Special Work Products

1. SLEIS Project. As requested by the DNR, UNI shall assist with the beta-testing (tentatively scheduled to begin in spring 2015) of the State and Local Emission Inventory System (SLEIS) program.

2. Open Burning. As requested during this contract period, UNI shall assist the DNR in disseminating to small businesses outreach materials developed and provided by the DNR to discourage open burning.

3. Analysis of Needs. No later than October 1, 2014, UNI shall evaluate and provide the DNR with a written summary that identifies the need for the development of additional compliance tools for small businesses. The summary shall identify, but shall not be limited to:

a) Method(s) used to evaluate needs of small businesses;
b) Proposed type and format of tools;
c) Source sector(s) affected;
d) Frequency of tool usage; and
e) Estimation of UNI resources needed to develop and deploy the tool(s).

5.1.19 Summary of Obligations

The following are obligations UNI shall complete to meet tasks identified in this Contract.

Obligation	Reference	Task Milestone Date
Maintain General and NESHAP Database	5.1.3/1 & 2	Ongoing, minimum of 3 years
Toll-free Number	5.1.3/3	Ongoing
Maintain Website	5.1.3/4	Ongoing
Notice of CAA Rights	5.1.9	Ongoing
Compliance Methods	5.1.10	Ongoing
Air Pollution Prevention	5.1.12	Ongoing
Distribute Compliance Assistance Tools	5.1.14/3	Ongoing
Training	5.1.1/3	As Needed/Determined
Intergovernmental Collaboration	5.1.8	As Needed
Rule Development	5.1.13	As Requested/Necessary
Develop Compliance Assistance Tools	5.1.14/3	As Requested/Necessary
Provide On-Site Audits	5.1.16	As Requested
Modification Requests	5.1.11	As Requested
MSEI Training	5.1.17/1a	As Requested
MSEI site visit	5.1.17/1e	As Determined
Prioritization of NESHAP	5.1.15/1a	As Requested/Necessary
NESHAP Compliance Assistance Tools & Outreach	5.1.15/1b	As Requested/Necessary
SLEIS Beta-Testing	5.1.18/1	As Requested/Necessary
Open Burning	5.1.18/2	As Requested/Necessary
Task Force/Workgroup Participation	6.2.2	As Determined
Outreach Meetings	6.2.3	As Requested
Special Reports	6.3.5	As Requested/Necessary
Late Work Products	6.1.2	No later than 10 days
Key Personnel Changes	5.1.1/4	As Needed
Address DNR Concerns	5.1.6	Within 15 days
Small Business Meetings/Event Participation	6.2.4	Within 2 weeks of request
July Monthly Report	6.3.1 & 6.3.2	August 15, 2014
August Monthly Report	6.3.1 & 6.3.2	September 15, 2014
July Invoice	7.5	September 15, 2014
MSEIQ Planning Meeting	5.1.17/1b	September 15, 2014
Analysis of Needs Summary	5.1.18/3	October 1, 2014

Obligation	Reference	Task Milestone Date
September Monthly Report	6.3.1 & 6.3.2	October 15, 2014
August Invoice	7.5	October 15, 2014
Draft MSEI Training Proposal	5.1.17/1c2	November 3, 2014
October Monthly Report	6.3.1 & 6.3.2	November 15, 2014
September Invoice	7.5	November 15, 2014
November Monthly Report	6.3.1 & 6.3.2	December 15, 2014
October Invoice	7.5	December 15, 2014
December Monthly Report	6.3.1 & 6.3.2	January 15, 2015
Work Plan	5.1.4/1a	January 15, 2015
Budget	5.1.4/1b	January 15, 2015
November Invoice	7.5	January 15, 2015
Final Draft MSEI Training Proposal	5.1.17/1c3	February 2, 2015
January Monthly Report	6.3.1 & 6.3.2	February 15, 2015
December Invoice	7.5	February 15, 2015
Initial Contract Review	5.1.4/2	March 15, 2015
February Monthly Report	6.3.1 & 6.3.2	March 15, 2015
January Invoice	7.5	March 15, 2015
March Monthly Report	6.3.1 & 6.3.2	April 15, 2015
February Invoice	7.5	April 15, 2015
Final Contract Review	5.1.5	April 30, 2015
MSEI Training Completed	5.1.17/1c	April 30, 2015
April Monthly Report	6.3.1 & 6.3.2	May 15, 2015
March Invoice	7.5	May 15, 2015
May Monthly Report	6.3.1 & 6.3.2	June 15, 2015
April Invoice	7.5	June 15, 2015
Compliance Assistance Tool Updates	5.1.18/1	June 30, 2015
June Monthly Report	6.3.1 & 6.3.2	July 15, 2015
May Invoice	7.5	July 15, 2015
Final Report	6.3.4	July 30, 2015
Final Invoice	7.5	August 5, 2015

5.2 The responsibilities of the DNR shall be to perform the following tasks.

5.2.1 Review of UNI

1. Review of Work Product. Within 15 days of receipt, DNR shall review each non-financial, informational document, compliance assistance tools, or reports submitted by UNI. DNR shall provide comments based on its review. Failure of DNR to provide comments within the allotted time constitutes approval by DNR.

2. Initial Draft Contract. By February 15, 2015, DNR shall submit to UNI the initial draft Contract for the period of July 1, 2015 through June 30, 2016. DNR shall provide written justification for any changes to the Contract.

3. Final Draft Contract. By April 15, 2015, DNR shall submit to UNI the final draft Contract for the period of July 1, 2015 through June 30, 2016.

4. Contract Negotiations. Annually, if requested by UNI and/or the DNR, the two parties shall meet to discuss final changes to the Contract.

5.2.2 Other Duties

1. Technical Assistance. Upon request from UNI, or as deemed necessary, the DNR shall provide technical assistance as needed.

2. Payment. The DNR shall withhold final payment until:

a) Receipt and acceptance of UNI's final performance report; and

b) Receipt and acceptance of all work products as required through this Contract.

3. Training. DNR shall provide UNI with access to training videos, workshops, and site visits that would serve as a development tool for UNI.

4. Workspace Accommodations. DNR shall accommodate UNI with workspace, staff accessibility, and resources should UNI decide to work in the DNR office on Air Quality projects. UNI IAEAP staff shall contact the DNR Project Manager to set up the logistics of working in the DNR office.

5.2.3 Intergovernmental Cooperation

1. Program development. To assure uniform adoption of emissions inventory procedures DNR shall participate in the development of public workshops and other educational projects, as deemed necessary.

2. Program changes. In addition to the assistance and cooperation noted regarding specific issues above, the DNR shall make every effort to keep UNI informed of state and federal developments, which may affect the program.

3. Joint Collaboration Projects. The DNR shall collaborate, as needed, with UNI and the Small Business Liaison – Air Quality to develop and implement joint collaboration projects, evaluate the outcomes, and identify concerns.

Iowa Department of Natural Resources
Environmental Protection Commission

ITEM **19** **INFORMATION**

TOPIC Executive Order 80 (EO 80) Stakeholder Group on Permits for Diversion, Storage, and Withdrawal of Water from the Cambrian-Ordovician (Jordan) Aquifer

The Jordan Aquifer Water Use Permitting Stakeholder Group will be presenting their final recommendations to the Environmental Protection Commission and the Department of Natural Resources.

Governor Branstad issued Executive Order 80 (EO 80) to increase stakeholder involvement and input on administrative processes and rules. The Director, in consultation with the Governor's Office, selected a stakeholder group to make recommendations and consider the need for rulemaking to better manage the usage of the Cambrian-Ordovician Aquifer (commonly called the Jordan Aquifer) in Iowa on a more regional level. A list of the stakeholder group members is attached.

Background: Currently, the Iowa Administrative Code (567—Chapter 50, "Scope of Division," Chapter 52, "Criteria and Conditions for Authorizing Withdrawal, Diversion and Storage of Water," and Chapter 53, "Protected Water Sources) prohibits municipal, commercial, and industrial entities from water use in the Jordan Aquifer that would lower the groundwater table by more than 200 feet from historic levels. It also limits the rate of water withdrawals for industrial use to 2,000 gallons per minute. These restrictions may not be appropriate for everyone because the characteristics of the Jordan Aquifer vary greatly across the state. For example, protecting the Jordan Aquifer from overuse may be needed in some parts of the state but may not be necessary in other locations. A rule addressing water usage of the Jordan Aquifer on a more local basis would allow additional usage of the aquifer where sufficient supply exists. It would also prevent someone from significantly investing in developing a Jordan well only later to find that the amount of water that can be withdrawn is severely limited.

The stakeholder group met on February 24, March 20, April 3, May 5, and May 16, 2014.

Members of this committee and the representation the members provided are outlined in the following table:

Name	***Organization***	***Representing***
John Crotty	Iowa Environmental Council	Environmental advocacy group
Shawn Kerrick	Koch Nitrogen	Industrial user from business located in affected area
Gale McIntosh	Northway Pump	Water well contractor
Jill Soenen	Iowa Association of Municipal Utilities	Municipal utility association
Todd Steigerwaldt	City of Marion (Water Works)	Municipal user in affected area
Becky Svatos	Stanley Consultants, Iowa ABI	Professional consulting engineering firm, Business association
Nancy Couser	Environmental Protection Commission	State agency

Date: May 30, 2014

EO80 Stakeholder Group for the Jordan Aquifer

Mission Statement

Propose revisions to regulations and management policies that preserve and protect the Jordan Aquifer as a clean, reliable water resource for Iowa now and for Iowa's future growth and economic development.

The stakeholder group consisted of seven members with varying backgrounds and interests in the proposed revisions to the Jordan Aquifer. The group reviewed and discussed some proposed amendments that were initially considered by the IDNR. The proposed change from a maximum 200-foot drawdown to a drawdown limit based on 50% of the available head in the aquifer was not supported by the group. The primary concern was the potential for additional large drawdown in portions of the aquifer that could cause irreversible water quality and/or structural impacts throughout the aquifer. No scientific information was available to demonstrate that large additional withdrawals from the aquifer would be protective of the entire aquifer. The group recommends that the IDNR re-evaluate the condition of the Jordan Aquifer after five years of additional data gathering and analysis and consider modifying the rule further based on the new information. This would allow for long term protection of the Jordan Aquifer for future generations.

The group has developed a number of recommendations for the IDNR to consider, review and share with all the stakeholders in the state who currently have a Jordan well or are considering drilling one.

Recommendations to Improve the Management of Water Withdrawal from the Cambrian-Ordovician Aquifer (Jordan Aquifer) in Iowa

We recommend a three-tiered regulatory approach with specifically defined regulatory trigger points for each tier:

Tier 1 Wells:

- Wells that are not yet to a level of concern based on current and proposed annual water use and drawdown reports. Applies only to existing Jordan wells.

Tier 2 Wells (Protected Source Area Wells - minimum level for all new wells):

- Define an action level by which a Tier 1 well becomes a Tier 2 well. Consider using pumping levels, past actual static levels, and/or models to determine the action level. Prefer pumping levels. We discussed using a 350-foot pumping drawdown as the level of concern, but IDNR should evaluate whether this is the appropriate level. We wanted to allow additional drawdown, but not a large additional drawdown that may have unanticipated negative consequences. We thought it was important to have a warning level before the drawdown limit is reached.

- Define protected water source areas based on all available data (well levels, models, etc.). Include variance options that could lead to exclusion of a well from the protected area.

- We recommend additional public notifications or updates occurring in protected water source areas.

- Require a site-specific water conservation plan that is reviewed and approved by IDNR (567 IAC 52.9). The permittee should set a defined annual usage percent reduction target that will prevent them from reaching the Tier 3 drawdown limit.

- We recommend enforcement if the conservation plan is not implemented.

- We recommend reduced allocations if the conservation plan is not implemented.

- We recommend revocation of permit if the conservation plan is not implemented.

- We recommend implementing a process to ensure that water use allocations are reserved for existing users prior to issuance of new well construction permits by IDNR and county sanitarians.

- Require water use allocation forecasts that are determined for entire pumping region prior to issuance of new well construction permits by DNR and county sanitarians.

Tier 3 Wells (Drop dead level):

- Define an action level by which a Tier 2 well (or group of Tier 2 wells) becomes a Tier 3 well (or group of Tier 3 wells). Consider using pumping levels, past actual static levels, and/or models to determine the action level. This could/should rely more heavily on model data than the Tier 1 to Tier 2 switch. We discussed using a 400-foot pumping drawdown as the limit, but IDNR should evaluate whether this is the appropriate level. We wanted to allow additional drawdown, but not a large additional drawdown that may have unanticipated negative consequences.

- Require reduced allocations and other aggressive water conservation plans be implemented.

- Once a well hits the drop dead level, they cannot increase their drawdown. This limit needs to be enforced.

- Use model to determine future allocations. As model improves revise allocations.

All wells and all permits:

- Define, for each individual well currently permitted to withdraw water from the Jordan, what the exact starting point/reference level is. Use drawings and examples (i.e. Measure from top of existing well casing) to make it very clear to all permit holders what the reference level is for the well. Each Jordan permit should have a groundwater elevation and reference measuring point defined in the permit for the Tier 2 threshold and Tier 3 limit.

This comment relates to the regulatory and permit requirement: "…the 1977 baseline as determined from available records of the Iowa Geological Survey". [567 IAC 52.4(3)*c*]

Example – Use the 1977 potentiometric "model defined" original static water level and then determine the Tier 1, Tier 2 and Tier 3 allowable pumping drawdown level allowed in an individual well.

Tier 1 – No issue: Does not exceed (example= 350') pumping water elevation drawdown
Tier 2 – Warning level: 350-450 ft. i.e. Proposed "Source Water Protected Areas"
Tier 3 - "Drop-dead level" 450 ft. i.e.

- We recommend switching from static water level to pumping water level measurements. If implemented, IDNR must clearly define in permits how pumping levels should be measured (i.e. drawings, written guidance, IDNR on-site technical support, etc.). [significantly revise and clarify 567 IAC 52.6]

- If static water level measurement remains part of the regulatory requirements, issue specific regulatory language or guidance about how to perform static water level testing. Consider IDNR involvement during measurements, if requested by the permittee. Some facilities cannot shut down a well to allow it to recover to static conditions. This makes it unrealistic to use static water level measurements.[567 IAC 52.6]

Additional Recommendations/Suggestions

- Creation of protected water source areas where the Flow Model has identified specific locations/regions where the Jordan Aquifer static water level is rapidly depleting. We agree with IDNR's proposed protected source areas.

- The Jordan Aquifer groundwater model must be maintained and improved continuously as a management tool for the aquifer.

- Require all Jordan Aquifer water pump test results for existing and new wells be submitted to IDNR for use in improving the Jordan Aquifer model.

- IDNR should require pump tests for new wells or increased water use allocation from existing wells in protected source areas. IDNR may also require observations wells, if necessary, to evaluate impacts on existing water users. IDNR should be sure that pump tests are long enough to evaluate impacts to other users in the protected source areas.

- Reevaluate protected source area warning and drop-dead water area levels every 5 years based on new model that uses annual report data and new well test pumping data.

- We recommend that IDNR hold annual public meetings and issue annual reports of the health of the Jordan Aquifer.

- We recommend creating a Jordan Aquifer email list serve for all existing Jordan well permit holders to allow public notification to existing well permittee's when new allocations or wells are being considered or reviewed in the protected source areas.

- Geothermal use wording in draft regulations document received from DNR April 2014 is acceptable (no 'pump and dump' geothermal withdrawals from the Jordan Aquifer). 52.4(3) b.

- We recommend that no new Jordan Aquifer withdrawals for once-through (single-pass) cooling water use be allowed. If Jordan Aquifer water is allocated for cooling, the facility must use cooling towers or other methods to reuse the water.

- 200 gpm limits on agricultural, recreational, and aesthetic uses in existing rules are adequate. The group mostly agreed that the economics of constructing a Jordan well with a limit of 200 gpm would deter most applicants.

- Requiring that initial contact for all new Jordan wells go through IDNR (before county sanitarians)

- Require at issuance of new or renewed permit time:

    - Continuous totalized flow measurement from the well (meters). [567 IAC 52.6]
    - Annual reports of measured monthly totals. [567 IAC 52.6]
    - Justification of allocations greater than past annual water consumption (permit renewal process). In protected source areas, allocations beyond actual current need should be strictly limited.

- We recommend switching from 10-year permit renewal to 5-year permits. [implement authority under 567 IAC 52.5(3)]

- We recommend annual on-site inspection program (public and private permits) for meters, on-site well systems, well level measurements, etc. [567 IAC 52.6]

- Recommend maintaining 2000 gpm limit on industrial withdrawals in existing rules.

- Continual allocation of adequate funding and/or resources to maintain an accurate and up-to-date model. Example - Fee per million gallons withdrawn from Jordan Aquifer. Consider increasing water use fees or creating an additional fee or fund to help pay for these additional recommendations.

Monthly Variance Report
April 2014

Item No.	Facility/City	Program	DNR Reviewer	Subject	Decision	Date
1	Cargill Inc	Air Quality	Dennis Thielen	variance to extend stack testing date	approved	4/7/2014
2	DNR Geode State Park	Wastewater	Mark Valmore	variance from design standards for cell isolation which implies piping is providedto allow system to remain in operation with any one cell out of service.	denied	4/7/2014
3	Gable Corp	Air Quality	Brian Hutchins	variance from construction permit condition to allow for additional operating time during installation of new substation	denied	4/7/2014
4	City of Ankeny	Wastewater	Emy Wenxin Liu	variance to design standards when installing gravity sewer by directional boring. variance to extend construction period	approved	4/7/2014
5	DNR Geode State Park	Wastewater	Mark Valmore	variance to wastewater design standards; variance for location of influent lines	approved	4/7/2014
6	DNR Geode State Park	Wastewater	Mark Valmore	variance to wastewater design standards; variance for location of influent lines	approved	4/7/2014
7	DNR Geode State Park	Wastewater	Mark Valmore	variance to wastewater design standards; variance for location of influent lines	approved	4/7/2014
8	North Liberty STP	Wastewater Construction	Mark Valmore	variance to design standardss for installing portion of gravity sewer using horizontal directional boring	approved	4/7/2014
9	Cargill Inc	Air Quality	Dennis Thielen	variance to exceed 4.0 in H2O pressure across scrubber to conduct engineering tests.	approved	4/8/2014
10	Equistar Chemicals	Air Quality	Reid Bermel	variance to temporarily operate polymer reactors by increasing production limit	approved	4/14/2014
11	Novartis Animal Health Inc	Air Quality	Dennis Thielen	variance to install emergency generators prior to permits being issued	approved	4/16/2014
12	Martin Marietta New Harvey	Air Quality	Diane Brockshus	variance to install and operate stationary engine prior to permit being issued	approved	4/17/2014
13	Des Moines Water Works	Water Supply Protection	Kelly Poole	variance to allow placement of granular fill in place of riprap below ordinary high water line at two radial collector wells.	approved	4/22/2014
14	BROS-CO31	Flood Plains	Jim Hallmark	variance to freeboard criterion	approved	4/23/2014
15	Town & Country Veterinary Clinic	Air Quality	Ann Seda	variance to operate cremation incinerator prior to obtaining permit.	denied	4/23/2014
16	City of Ackley	Wastewater	Marty Jacobs	variance from design standards for installing gravity sewer by directional drilling	approved	4/24/2014
17	City of Sioux City	Wastewater	Din Gupta	variance from design standards to use trenchless construction	approved	4/25/2014
18	Mathy Construction	Air Quality	Reid Bermel	variance to install and operate stationary engine prior to permit being issued	approved	4/25/2014
19	Lararge US	Air Quality	Reid Bermel	variance to perform Nox emissions reductions prior to obtaining permit	approved	4/28/2014
20	Little Sioux Corn	Air Quality	Ann Seda	variance to install grain receiving and storage equipment prior to issuance of contruction permits	approved	4/28/2014
21	Cargill Inc	Air Quality	Dennis Thielen	variance to conduct engineering test to determine if they can operate scrubber at lower flow rate	approved	4/28/2014
22	Valero Renewable Fuels-Albert City	Air Quality	Ann Seda	variance to operate new reclaim nad transger conveyors prior to obtaining modified construction permit	approved	4/29/2014

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION COMMISSION
ATTORNEY GENERAL REFERRALS
June, 2014

Name, Location and Region Number	Program	Alleged Violation	DNR Action	New or Updated Status	Date
BCB Ag, LLC Inwood (3)		Uncertified Applicator; Lack of Signage for Manure Service on Vehicle	Referred to Attorney General	Referred	4/15/14
Grain Processing Corporation Muscatine (6)	Air Quality Wastewater	Operation Without (PSD) Permit; Emission Standards – Particulate; Failure to Comply - MON; Construction Without WW Permit	Referred to Attorney General	Referred Petition Filed Answer CLAM Motion to Intervene Hearing on Intervention Ruling Granting CLAM Intervention Amended and Substituted Petition Consent Decree ($1,500,000 Civil Penalty, Conversion to Natural Gas, Corrective Action and Permanent Injunction	4/19/11 12/01/11 1/10/12 1/24/12 4/03/12 6/25/12 7/24/13 3/27/14
Hoffman, Matt Hinton (3)	Animal Feeding Operation	Failure to Submit MMP and Fees	Referred to Attorney General	Referred	4/15/14
Iowa Farm Bureau Federation et. al. Polk Co. (5)	Wastewater	Judicial Review of Antidegradation Rules	Attorney General	Petition Filed State's Answer Motion to Intervene by Sierra Club Motion to Intervene by Iowa Environmental Council and Environmental Law & Policy Center Hearing on Intervention Ruling Granting Intervention State's Motion for Summary Judgment; Undisputed Facts; Affidavits; Appendix and Memorandum Hearing on Petitioners' Motions Ruling Denying Petitioners' Motions Petitioner's Application for Interlocutory Appeal Petitioner's Motion for Stay State's Resistance to Application State's Resistance to Motion for Stay Hearing on Motion for Stay Supreme Court Denial of Interlocutory Appeal Petitioners' Motion for Stay Hearing Withdrawn Petitioners' Motion for Summary Judgment and Cross-Motion for Summary Judgment Hearing on Motions for Summary Judgment Ruling Granting State's Motion for Summary Judgment Notice of Appeal Petitioner's Proof Brief State's Proof Brief State's Designation of Appendix Appendix Filed Respondent-Intervenors' Proof Brief	10/04/10 10/27/10 11/03/10 12/15/10 1/20/11 2/03/11 4/29/11 9/30/11 10/14/11 10/31/11 11/08/11 11/14/11 11/16/11 11/30/11 11/23/11 11/30/11 12/21/11 1/18/12 3/29/12 4/26/12 9/28/12 11/28/12 11/28/12 1/23/13 12/03/12

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION COMMISSION
ATTORNEY GENERAL REFERRALS
June, 2014

Name, Location and Region Number	Program	Alleged Violation	DNR Action	New or Updated Status	Date
				Petitioners' Proof Reply Brief	2/05/13
				Petitioner's Final Brief	2/06/13
				Petitioner's Final Reply Brief	2/06/13
				State's Final Brief	2/06/13
				Respondent-Intervenor's Final Brief	2/08/13
				Oral Argument before Iowa Supreme Court	10/09/13
McMains, Phil Appanoose Co. (5)	Air Quality Solid Waste	Open Burning Illegal Disposal	Referred to Attorney General	Referred	6/19/12
				Petition Filed	8/08/13
				Answer	9/03/13
				Motion for Leave to Amend Petition	1/02/14
				Trial Date	12/03/14
North Central Iowa Regional SWA Fort Dodge (2)	Solid Waste	Operating Permit Violations	Referred to Attorney General	Referred	9/17/13
North Iowa Area Solid Waste Agency Sheldon (3) **UPDATED**	Solid Waste	Unapproved Leachate Collection System	Referred to Attorney General	Referred	1/15/13
				Petition Filed	9/26/13
				Answer	10/11/13
				Third Party Petition Against Elliot Waddell and Five States Engineering, PLC	10/11/13
				State's Resistance to Demand for Jury Trial	10/23/13
				Hearing Regarding Jury Trial Demand	11/25/13
				Ruling Denying Jury Demand	1/17/14
				Motion to Clarify Ruling	1/23/14
				Nunc Pro Tunc Order Jury Demand Allowed for 3rd Party Defendant	1/28/14
				State's Motion to Strike or Sever 3rd Party Petition	2/11/14
				Resistance to Motion to Strike	2/24/14
				Application for Default Judgment	3/12/14
				Order Granting Default Judgment Against 3rd Party Defendant	3/13/14
				Trial Date	3/31/15
Peeters Development Co., Inc.; Mt. Joy Mobile Home Park Davenport (6)	Wastewater	Monitoring/Reporting; Compliance Schedule; Discharge Limits; Operation Violations; Certified Operator Discipline	Referred to Attorney General	Referred	3/18/14
Sioux-Preme Packaging Co. Sioux Center (3)	Wastewater	Prohibited Discharge; Operation Violations; WQ Violations – General Criteria	Referred to Attorney General	Referred	9/17/13

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION COMMISSION
ATTORNEY GENERAL REFERRALS
June, 2014

Name, Location and Region Number		Program	Alleged Violation	DNR Action	New or Updated Status	Date
Van Beek, Vern Inwood (3)	**UPDATED**	Animal Feeding Operation	Prohibited Discharge	Referred to Attorney General	Referred Petition Filed Consent Decree ($12,000/Civil Penalty; Injunction)	10/16/12 5/22/14 5/22/14

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION COMMISSION
CONTESTED CASES
June, 2014

DATE RECEIVED	NAME OF CASE	F.O.	ACTION APPEALED	PROGRAM	ASSIGNED TO	STATUS
11/27/01	Dallas County Care Facility	5	Order/Penalty	WW	Hansen	10/03 – Letter to County attorney regarding appeal resolution. 1/04 – Letter to attorney regarding appeal. 4/04 – Dept. letter to attorney regarding appeal. 9/04 – Dept. letter to attorney regarding appeal. 6/26/07 – Appeal resolved. Facility connected to City WWTF. Consent order to be issued. 1/29/13 – Order amendment drafted.
10/29/09	Harlan Rudd; Karen Rudd; dba Rudd Brothers Tires	6	Order/Penalty	UT	Brees	Informal negotiation. CADR was submitted, partially rejected with options. Settlement letter sent 2/24/10.
12/16/09	Guy Thomas	4	Order/Penalty	UT	Brees	Oral agreement for tank removal prior to April 1, 2010. Continued negotiation on final settlement.
2/25/10	Higman Sand & Gravel Inc.	3	Order/Penalty	FP	Clark	Negotiating before filing.
3/11/10	Bondurant, City of	5	Order/Penalty	WW	Hansen	7/2013-On hold pending further investigation.
11/3/2010	Wendall Abkes	2	Order/Penalty	SW	Schoenebaum	Settlement phone call held. Mr. Abkes indicated he would enter into a settlement. 6/12/13 -- Offer to settle sent via certified mail. Letter was returned as unclaimed.
12/29/10	Griffin Pipe Products Co., Inc.	4	Permit Conditions	AQ	Preziosi	**Last communication with appellant 5/6/14.**
1/31/11	Griffin Pipe products Co., Inc.	4	Tax Certification Request	AQ	Preziosi	Settled in concept 1/28/14**. Last communication with appellant 5/6/14.**
2/28/11	Manson, City of	3	Order/Penalty	WS	Hansen	4/1/11 – Settlement conference held with City. 6/22/11- Settlement offer received from City attorney. 6/28/11- More information requested from City attorney concerning the settlement proposal. 11/29/11- Settlement meeting with City regarding new well project. 12/2011 – City proceeding with project. 6/2012**-** Contractor worked on new well to remove debris in well. Test pump to be installed to do test of well capacity. 07/2012- City to abandon new well and select new site for well to increase PWS capacity. 10/2012- Water plant work to be done week of 12/10/12. 5/2013- New well project & appeal on hold, pending UDSA funding decision. 6/2/13 – USDA funding decision received. 6/26/13 – New bid date for well project. . 7/2013- Tentative schedule for new well received from City's engineer**.** 8/13 – Drilling on test well begun by contractor. 9/13 – Test well not productive, new well site approved by Dept. New test well to be drilled. 10/13-

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION COMMISSION
CONTESTED CASES
June, 2014

DATE RECEIVED	NAME OF CASE	F.O.	ACTION APPEALED	PROGRAM	ASSIGNED TO	STATUS
						Test well drilled but not successful. Test well abandoned. City Council to decide on next step. 1/24/14 – City's engineer sent revised construction schedule for another test well and production well. **5/23/14- Test well drilled but not successful. City Council to determine next step.**
8-27-12	Ag Processing, Inc.; Sergeant Bluff	4	Permit Conditions	AQ	Preziosi	Met with appellant 1/31/14. Met with appellant 3/12/14. Negotiations continuing. Appellant to submit further information in April. **Settled in concept. Last communication with appellant on 5/22/14.**
11-21-12	Ag Processing Inc.	6	Permit Conditions	AQ	Preziosi	Continuing negotiations. **Last communication with appellant on 5/20/14.**
3-04-13	Anderson Excavating Co., Inc.	4	Order/Penalty	SW	Tack	Negotiating before filing.
6-20-13	Joseph and Carol Jahnke	1	Dam Application	FP	Schoenebaum	Proposed decision 1/8/14. 1/21/14 – EPC affirmed decision. Decision final
6-10-13	Mike Jahnke	1	Dam Application	FP	Schoenebaum	Hearing scheduled for April 9, 2014, Mr. Jahnke requested a continuance. **Status conference with Judge was held April 23, 2014; another status conference is scheduled to be held June 4, 2014; at this time a new hearing date may be selected.**
9-09-13	David Hansen; Debra D. Imhoff	6	Order/Penalty	FP	Schoenebaum	Appeal filed 9/9/13.
10-28-13	Regional Environmental Improvement Commission/Iowa Co. SLF	6	Variance	WW	Tack	Negotiating before filing.
11-07-13	Linn County Conservation Board Pinicon Ridge Park	6	Permit Conditions	WS	Hansen	2/27/14 – Settlement offer sent. 3/24/14 – Response received from Linn Co. 4/2014- Linn County in agreement to install chlorination/construction permit application submitted to Dept. Permit amendment to be issued. **5/2014- Construction permit issued by Dept.; construction to be completed 5/2014.**
1-02-14	P & J Pork, LLC		Construction Permit Denial	AFO	Clark	**4/23/14 – Hearing held; briefing underway.**
1/16/14	Council Bluffs Water Works	4	Permit Conditions	WW	Tack	Negotiating before filing.

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION COMMISSION
CONTESTED CASES
June, 2014

DATE RECEIVED	NAME OF CASE	F.O.	ACTION APPEALED	PROGRAM	ASSIGNED TO	STATUS
1/21/14	AG Processing, Inc.		Permit Conditions	AQ	Preziosi	Negotiations continuing**. Last communication with appellant on 5/20/14.**
4/17/14	REIC/Iowa Co. Sanitary Landfill	6	Permit Conditions	WW	Tack	Negotiating before filing.

DATE: June, 2014

TO: EPC

FROM: Ed Tormey

RE: Enforcement Report Update

The following new enforcement actions were taken during this reporting period:

Name, Location and Field Office Number	Program	Alleged Violation	Action	Date
Barker Specialty Products LLC Keosauqua (6)	Wastewater	Pollution Prevention Plan Violations	Consent Order $3,000	5/06/14
Storm Lake, City of (3)	Drinking Water	Construction Without Permit	Consent Order $2,000	5/19/14
John Fluit Jr. Lyon Co. (3)	Animal Feeding Operation	Prohibited Discharge – Open Feedlot; WQ Violations – General Criteria	Consent Order $9,000	5/19/14
Larrell DeJong; Jodi DeJong Osceola Co. (3)	Animal Feeding Operation	Construction Without Permit	Consent Order $2,250	5/20/14
Humboldt, City of (2)	Drinking Water	Compliance Schedule	Consent Order $10,000	5/23/14
Northern Dewatering, Inc. Storm Lake (3)	Drinking Water	Construction Without Permit	Consent Order $6,000	5/23/14
Martin Moeller Henry Co. (6)	Air Quality; Solid Waste	Open Burning; Illegal Disposal	Consent Order $5,000	5/23/14
Marvin G. Moeller Henry Co. (6)	Air Quality; Solid Waste	Open Burning; Illegal Disposal	Consent Order $5,000	5/23/14

IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION COMMISSION
RULE MAKING STATUS REPORT
June, 2014

Proposal	Stakeholder Engagement	Sent for Governor's Pre-Approval (Job Impact) Statement		Notice to EPC	Notice Published	ARRC No.	ARRC Mtg.	Hearing	Comment Period	Final Summary To EPC	Rules Adopted	Rules Published	ARRC No.	ARRC Mtg.	Rule Effective
1. Ch. 22, 23 –AQ – Grain Vacuuming		2/28/14 11/22/13	3/24/14	4/15/14	5/14/14	1458C	6/10/14	6/16/14	6/16/14						
2. Ch. 48, 38, 39, 49 and 82 – Ground Heat Exchanger (GHEX) Loop Borehole Systems															
3. Ch. 61 - Water Quality Standards, Section 401 Certification of Section 404 Regional Permit (RP 7)		11/6/14	1/16/14	2/18/14	3/19/14	1370C	4/07/14	4/09/14	4/18/14	5/20/14	5/20/14	6/11/14	1495C		7/16/14
4. Ch. 61 – Water Quality Standards; Surface Water Classification; Batch 4															
5. Ch. 64, 65 – CAFOS/NPDES Permit Requirement	1/22/14	2/19/14	3/05/14	3/18/14	4/16/14	1421C	5/13/14	5/6,7,8,9 and 12/14	5/13/14						
6. Ch. 107 – Beverage Container Deposits – Phase 1															

IOWA DEPARTMENT OF NATURAL RESOURCES
LEGAL SERVICES BUREAU

DATE: June 1, 2014

TO: Environmental Protection Commission

FROM: Ed Tormey

SUBJECT: Summary of Administrative Penalties

The following administrative penalties are due:

NAME/LOCATION	PROGRAM	AMOUNT	DUE DATE
Robert and Sally Shelley (Guthrie Center)	**SW**	**1,000**	**3-04-91**
Daryl & Karen Hollingsworth d/b/a Medora Store(Indianola)	**UT**	**3,876**	**3-15-96**
Greg Morton; Brenda Hornyak (Decatur Co.)	**SW/AQ/WW**	**3,000**	**11-04-98**
James Harter (Fairfield)	**WW**	**1,336**	**8-01-01**
Wisconsin North dba National Petroleum, Inc. (Clinton)	**UT**	**5,000**	**8-04-01**
# Practical Pig Corporation (Clinton Co.)	**AFO**	**2,000**	**5-26-02**
Midway Oil Co.; David Requet (Davenport)	**UT**	**5,355**	**9-20-02**
Midway Oil Co.; David Requet; John Bliss	**UT**	**44,900**	**2-28-03**
Green Valley Mobile Home Park (Mt. Pleasant)	WW	5,000	4-23-03
Midway Oil Company (West Branch)	**UT**	**7,300**	**5-03-03**
Midway Oil Company (Davenport)	**UT**	**5,790**	**5-03-03**
Albert Miller (Kalona)	**AQ/SW**	**9,790**	**9-26-03**
Mike Messerschmidt (Martinsburg)	**AQ/SW**	**500**	**4-13-04**
Interchange Service Co., Inc., et.al. (Onawa)	WW	6,000	5-07-04
# Dunphy Poultry (Union Co.)	**AFO**	**1,500**	**6-27-04**
# Cash Brewer (Cherokee Co.)	**AFO/SW**	**10,000**	**8-25-04**
# Doorenbos Poultry; Scott Doorenbos (Sioux Co.)	**AFO**	**1,500**	**10-09-04**
Rock N Row Adventures (Eldora)	WS	3,000	10-23-04
# Doug Sweeney (O'Brien Co.)	**AFO**	**375**	**12-21-04**
Harold Linnaberry (Clinton Co.)	SW	1,000	5-18-05
# Joel McNeill (Kossuth Co.)	**AFO**	**2,460**	**1 21-06**
Affordable Asbestos Removal, Inc. (Monticello)	**AQ**	**7,000**	**4-28-06**
# Troy VanBeek (Lyon Co.)	**AFO**	**3,500**	**10-16-06**
Larry Bergen (Worth Co.)	**AQ/SW**	**257**	**11-01-06**
# Joshua Van Der Weide (Lyon Co.)	**AFO**	**3,500**	**2-25-08**
Karl Molyneux (What Cheer)	**AQ/SW**	**960**	**7-19-08**
George Kramer (Clinton Co.)	**AQ/SW**	**1,500**	**11-09-08**
Jon Knabel (Clinton Co.)	**AQ/SW**	**2,000**	**12-16-08**
Stuart Yoder (Johnson Co.)	**AQ/SW**	**224**	**2-11-09**
# Robert Fangmann (Dubuque Co.)	**AFO**	**396**	**6-01-09**
# Rick Renken (LeMars)	**AFO**	**996**	**7-03-09**
# Brian Lill (Sioux Co.)	**AFO**	**3,342**	**7-18-09**
# Lane Bachman (Calhoun Co.)	**AFO**	**3,885**	**10-08-09**
Denny Geer (New Market)	**SW**	**9,476**	**10-31-09**
Shrey Petroleum; Palean Oil; Profuel Three (Keokuk)	UT	10,000	3-19-10
Melvin Wellik; Wellik-DeWitt Implement (Britt)	**AQ/SW**	**2,900**	**4-08-10**
Alchemist USA, LLC; Ravinder Singh (Malcom)	UT	8,260	5-03-10
# LJ Unlimited, LLC (Franklin Co.)	AFO/AQ/SW	3,500	5-27-10
Bret Cassens; J & J Pit Stop (Columbus Junction)	UT	8,700	6-20-10

#Animal Feeding Operation
BOLD Entries Have Been Referred to DRF

# Christopher P. Hardt (Kossuth Co.)	AFO	2,000	7-07-10
AKD Investments, LLC; H.M. Mart, Inc. (Blue Grass)	UT	6,900	8-06-10
Eastern Hills Baptist Church (Council Bluffs)	WS	1,250	11-29-10
James Bailey; James Bailey Construction (Douds)	**AQ/SW**	**634**	**12-01-10**
# Joe McNeill (Kossuth Co.)	**AFO**	**2,500**	**12-23-10**
Gonzalez & Sons Express, Inc. (DeSoto)	**WW**	**8,000**	**4-20-11**
David C. Kuhlemeier (Cerro Gordo Co.)	**AQ/SW**	**2,000**	**6-30-11**
Steve Friesth (Webster Co.)	**AQ/SW**	**7,857**	**11-26-11**
Josh Oetken (Worth Co.)	**AQ/SW**	**8,495**	**3-11-12**
Jeffrey G. Gerritson (O'Brien Co.)	**SW**	**2,000**	**4-16-12**
Bhupinder Gangahar/Saroj Gangahar/International Business	**UT**	**7,935**	**4-20-12**
Finney Industrial Painting, Inc. (Fairfield)	**AQ/WW**	**4,025**	**4-23-12**
Terry Philips; TK Enterprises (Washington Co.)	**AQ/WW**	**3,000**	**5-30-12**
# Boerderij De Vedhoek, LLC (Butler Co.)	**AFO**	**8,500**	**11-16-12**
James L. Heal; A-1 Imports (Homestead)	WW/SW	1,800	1-08-13
Sun-Jon, Inc.; Iowa Poultry (Johnson Co.)	WW	3,000	1-08-13
Noah Coppess (Cedar Co.)	AQ/SW	7,500	2-23-13
Shane Rechkemmer (Fayette Co.)	**SW**	**1,000**	**3-01-13**
Jeff Grooms; Floris One Stop (Floris)	**UT**	**3,500**	**3-01-13**
Keith Durand; Durand Construction (Lee Co.)	WW	500	3-07-13
B Petro Corporation (Cedar Rapids)	UT	7,728	5-13-13
Bernard Michelson (Hancock Co.)	AQ/SW	2,500	4-26-13
Ken Odom (Iowa Co.)	**AQ/SW**	**3,000**	**4-26-13**
Jacob Reed (Mahaska Co.)	AQ/SW	1,500	6-10-13
River Trading Company, Ltd. (Muscatine)	WW	3,000	9-15-13
Robert Downing (Mahaska Co.)	AQ/SW	10,000	11-20-13
# Steve and Paul Groth; Groth Farms (Mitchell Co.)	**AFO**	**3,000**	**11-17-13**
Shriners Hospital for Children, Inc. (Des Moines)	UT	8,890	12-03-13
Larry Eisenhauer (Woodbury Co.)	AQ/SW	4,675	3-01-14
# Darwin Rieck (Benton Co.)	AFO	4,750	2-28-14
Randy Wise; Wise Construction (Buena Vista Co.)	AQ/SW	3,000	4-10-14
Quality Mat Co., Inc. (Black Hawk Co.)	AQ	3,000	4-03-14
Advanced Electroforming, Inc. (Cedar Co.)	AQ	1,500	4-03-14
Bob Lehmen; Permeate Refining, Inc. (Delaware Co.)	AQ	1,500	4-03-14
Warren Garrett; Garrett Painting & Sandblasting (DM Co.)	AQ	1,500	5-24-14
Audra Early; Mid-States Mfg. & Engr. (Van Buren Co.)	AQ	2,500	4-03-14
Western Iowa Telephone Assoc. (Lawton)	WW	4,000	5-24-14
Simon Simonson (Kossuth Co.)	SW	5,000	5-30-14
# Larrell DeJong; Jodi DeJong (Osceola Co.)	AFO	2,250	6-20-14
# John Fluit Jr. (Lyon Co.)	AFO	9,000	6-19-14
Storm Lake, City of	WS	2,000	6-19-14
Marvin G. Moeller (Henry Co.)	AQ/SW	5,000	6-23-14
Martin Moeller (Henry Co.)	AQ/SW	5,000	6-23-14
Humboldt, City of	WS	10,000	6-23-14
	TOTAL	**377,767**	

The following penalties have been placed on payment plans:

*** Reginald Parcel (Henry Co.)**	**AQ/SW**	**110**	**4-23-05**
*** Country Stores of Carroll, Ltd. (Carroll)**	**UT**	**1,408**	**6-06-05**
*** Douglas Bloomquist (Webster Co.)**	**AQ/SW**	**3,500**	**12-01-07**
* Jack Knudson (Irwin)	UT	10,000	1-15-08
*** Craig Burns (Postville)**	**WW**	**950**	**7-15-08**
# Jerry Passehl (Latimer)	SW/WW/HC	2,695	7-01-09

#Animal Feeding Operation

BOLD Entries Have Been Referred to DRF

Jerry Wernimont (Carroll)	**AQ/SW**	**1,500**	**4-19-10**
# Ernest Greiner (Keokuk Co.)	**AFO**	**500**	**10-10-10**
Quad City Drum Recycling Co., Inc. (Davenport)	AQ	125	9-01-12
John Kletsch (Superior)	**AQ**	**600**	**11-01-12**
Jim Scallon (Butler Co.)	SW	700	4-15-13
R.H. Hummer Jr., Inc.; 2161 Highway 6 Trail (Iowa Co.)	AQ/SW	3,643	9-15-13
Patrick Baker; Stockton Auto (Davenport)	AQ/SW	747	6-15-14
Air Advantage, Inc. (Mt. Pleasant)	WW	3,000	4-01-14
Ellsworth Excavating Co. (Muscatine Co.)	AQ/SW	1,050	5-01-14
# Steve Grettenberg; Dragster LLC	AFO	3,500	1-20-14
Mid River Marine Service and Storage (North Liberty)	WS	5,720	9-30-13
Lonnie Bryant; Sierra Bryant; Bryant's MHP (Keokuk)	WW	100	5-01-14
Stephan A. Palen (Wapello Co.)	AQ	1,664	6-01-13
Millard Elston III; The Earthman (Jefferson Co.)	AQ/SW	2,000	2-15-13
	TOTAL	**43,512**	

The following administrative penalties have been appealed:

Dallas County Care Facility (Adel)	**WW**	**5,000**
Guy Thomas (Council Bluffs)	**UT**	**10,000**
Harlan Rudd; Karen Rudd; Rudd Bros. Tires (Drakesville)	**UT**	**10,000**
Bondurant, City of	**WW**	**10,000**
Higman Sand and Gravel, Inc. (Plymouth Co.)	**FP**	**10,000**
Helen and Virgil Homer; Grandmas Snack Shop; (Aredale)	WS	8,461
Manson, City of	**WS**	**10,000**
Wendall Abkes (Parkersburg)	**SW**	**7,000**
Pet Memories, Inc. (Cedar Co.)	SW	10,000
Anderson Excavating Company, Inc. (Pottawattamie Co.)	**SW**	**10,000**
David Hansen; Debra Imhoff (Wilton)	**FP**	**6,000**
	TOTAL	**96,461**

The following administrative penalties have been collected:

Lonnie Bryant; Sierra Bryant; Bryant's MHP (Keokuk)	WW	100
Patrick Baker; Stockton Auto (Davenport)	AQ/SW	83
Stephan A. Palen (Wapello Co.)	AQ	104
Finney Industrial Painting, Inc. (Fairfield)	**AQ/WW**	**250**
Albert Miller (Kalona)	**AQ/SW**	**5**
P.M. Lattner Manufacturing Co. (Linn Co.)	AQ	1,000
Barker Specialty Products, LLC	WW	3,000
Ellsworth Excavating Co. (Muscatine Co.)	AQ/SW	75
Stephan A. Palen (Wapello Co.)	AQ	208
Lonnie Bryant; Sierra Bryant; Bryant's MHP (Keokuk)	WW	100
Dennis Huedepohl; Breckenridge Estates MHP (Johnson Co.)	AQ/SW	5,000
Corey DeRocher; DeRocher Bros. Farms (Plymouth Co.)	AFO	2,000
Northern Filter Media, Inc. (Muscatine Co.)	AQ	1,000
Patrick Baker; Stockton Auto (Davenport)	AQ/SW	83
# Steve Grettenberg; Dragster LLC	AFO	1,000
Northern Dewatering, Inc. (Storm Lake)	WS	6,000
	TOTAL	**20,008**

#Animal Feeding Operation
BOLD Entries Have Been Referred to DRF

IOWA DEPARTMENT OF NATURAL RESOURCES

Strategic Plan

Fiscal Years 2014 – 2017

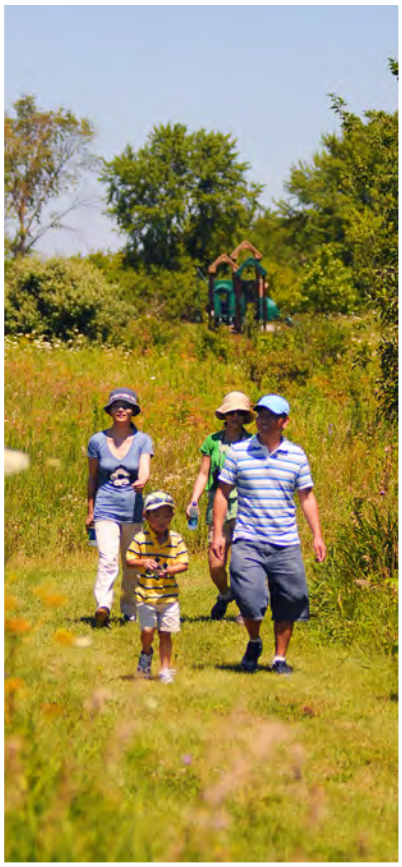
Iowa DNR Mission: To conserve and enhance our natural resources in cooperation with individuals and organizations to improve the quality of life in Iowa and ensure a legacy for future generations.

Iowa DNR Vision: Leading Iowans in caring for our natural resources

The work of the Iowa Department of Natural Resources touches the lives of nearly every Iowan. From managing fish and wildlife programs and ensuring the health of Iowa's forests and prairies, to providing recreational opportunities in Iowa's state parks and management areas to implementing state and federal laws that protect air, land and water, the DNR encourages the enjoyment and stewardship of Iowa's natural resources by all of our citizens. The Iowa Department of Natural Resources Strategic Plan reflects the Governor's Goals for Iowa and how the DNR contributes to those goals.

GOAL: Iowa will have a healthy and safe environment for work and play.

- Ensure the effectiveness of air, water and land quality programs by ensuring program requirements are easy to understand and implement, permits are issued in a timely manner, and programs are implemented consistent with state and federal laws.
- Make Iowa a preferred place to do business through expanded Business Regulatory Assistance and consistent and fair treatment of the regulated community.
- Increase technical assistance available in an effort to coach the regulated community for compliance and build stewardship of Iowa's natural resources.
- Expand existing collaborative efforts with our stakeholder groups to engage them in DNR's implementation of administrative rules and fees structures.



GOAL: Iowans will connect with nature.

- Provide safe, high-quality recreational opportunities across the state in an effort to contribute to the high standard of living in Iowa.
- Foster economic development through nature-based activities.
- Actively recruit new license buyers and work to retain existing license buyers.
- Build environmental and natural resource awareness and responsibility among Iowans through improved and enhanced conservation outreach and participation programs.
- Actively manage DNR properties to restore, enhance, conserve, and protect Iowa's natural resources, encourage public access, and promote education about Iowa's outdoor resources.
- Ensure that DNR regulations and license requirements are accessible to and easy to understand by our constituents.
- Build and expand partnerships with conservation groups and organizations to provide improved access to natural areas and engage more Iowans with Iowa's outdoor resources.

GOAL: The DNR continually strives to improve organizational performance.

- Strengthen the DNR's financial health by focusing available resources on priority areas.
- Ensure grants awarded by the DNR align with DNR priorities.
- Hire, retain and support a diverse and highly skilled workforce.
- Ensure all employees receive adequate safety training, are accountable, use agency resources effectively and efficiently, and perform in the public interest.
- Improve IT functionality for DNR staff in all statewide offices.
- Continuously review DNR's regulatory framework to ensure conformance with statutory law and to evaluate the effectiveness of the rules in implementing those statutes.