



Permitting for Environmental Results (PER)

NPDES Profile: Iowa and Indian Country

PROGRAM RESPONSIBILITY

State of Iowa: NPDES permitting authority for base program, general permitting, federal facilities, pretreatment

EPA Region 7: NPDES permitting authority for biosolids

EPA Region 7: NPDES permitting authority for all facilities in Indian Country

Program Integrity Profile

This profile characterizes key components of the National Pollutant Discharge Elimination System (NPDES) program, including program administration and implementation, environmental outcomes, enforcement, and compliance. EPA considers profiles to be an initial screen of NPDES permitting, water quality, enforcement, and compliance programs based on self-evaluations by the States and a review of national data. EPA will use the profiles to identify program strengths and opportunities for enhancements. For more information, contact Angela Chen, Iowa Department of Natural Resources, (515) 281-4736, or Ralph Summers, EPA Region 7, (913) 551-7418.

Section I. Program Administration

1. Resources and Overall Program Management

The State of Iowa:

The Iowa NPDES permit program (including federal facilities) was authorized on August 10, 1978. Pretreatment program authorization followed on June 3, 1981. General permit program approval occurred on August 12, 1992. Iowa may pursue authorization of the biosolids program. For many years NPDES permits, except for concentrated animal feeding operation (CAFO) permits, were written in the Waste Water Section, Water Quality Bureau, in the Environmental Services Division of the Iowa Department of Natural Resources (IDNR). This section also acted as a liaison with EPA Region 7 for most NPDES program activities. CAFO permits were written by the animal feeding group, also within the Environmental Services Division. During April 2004, the Water Quality Bureau was reorganized. The Waste Water Section was divided and a new NPDES Permitting Section was created. This new NPDES Section is now responsible for writing all types of NPDES permits.

Compliance and enforcement are handled by the Field Services and Compliance Bureau. The six field offices in this bureau conduct facility inspections, enter monitoring report information into the State's data system, evaluate compliance, and make referrals to the Legal Services Bureau in the IDNR's Central office. An organizational chart is provided at the end of this profile.

The IDNR's budget for the NPDES program includes \$1,240,000 from the Clean Water Act (CWA) Section 106 Grant, State General Funds of \$612,000, and stormwater permit fees of \$196,600. Staff resources currently devoted to the NPDES program include approximately 10.25 full time equivalents

(FTEs) for permit issuance, 21 FTEs for compliance/enforcement (which includes inspections), and 1.25 FTEs for legal staff. The IDNR has a very small staff to deal with its dischargers (127 major facilities, 1390 minor facilities, 4,299 facilities covered by non-stormwater general permits, and 4,193 stormwater dischargers covered by stormwater general permits)¹. Iowa's municipal sewage treatment plants include 98 major facilities and 678 minor facilities. There are approximately 1,800 CAFO operations.

The IDNR has internal training programs for NPDES-related activities, including experienced permit writing staff mentoring for new employees. All new permit writing staff also attend the national NPDES Permit Writers' Training Course. All staff is encouraged to take advantage of the numerous workshops, symposia, and other forms of training conducted by such groups as the Iowa Water Pollution Control Association. These opportunities allow staff to stay current on new federal and State regulations, wastewater treatment design and operations, pollution prevention, and new technologies.

EPA Region 7:

Two Region 7 staff members are assigned as the leads for Region 7's oversight of Iowa's NPDES program; one for permit issuance and one for compliance/enforcement. Other staff members also work on issues related to pretreatment, WQSSs, total maximum daily loads (TMDLs), and legal matters.

Region 7 retains authority under the CWA for implementation of the NPDES program in Indian Country. The NPDES permitting for Indian Country is conducted by the Water Infrastructure Management Branch (WIMB) in the Water, Wetlands and Pesticides Division (WWPD). The Regional NPDES enforcement activities are conducted by the Water Enforcement Branch (WENF) in the WWPD.

The Region's direct NPDES implementation program in Iowa is primarily devoted to four facilities (three facilities in Indian Country and one major municipal facility).² The Region is currently drafting permits for the three facilities located in Indian Country (two on the Meskwaki Nation's settlement near Tama, Iowa, and the other in Winnebago Indian Country near Sloan, Iowa). The major municipal permit (for which EPA is the permitting authority because of an objection) is currently expired, but will be reissued by the IDNR.

The Region is also responsible for directly implementing the biosolids program.

2. State Program Assistance

EPA Region 7:

Region 7 and the IDNR are currently working toward authorization of the biosolids program. Regional staff has been assigned to process and facilitate program approval.

¹ The National Data Sources column of the Management Report, measure #3, shows 316 facilities covered by general permits. This figure does not include discharging on-site systems, which were not included in ePIFT data at the time of the national data pull in March 2004.

² The National Data Sources column of the Management Report, measure #2, shows 2 minor facilities with EPA-issued individual permits, based on a list of EPA-issued permits provided by the Region in June 2004. The third permit was added to the list in September 2004.

3. EPA Activities in Indian Country

EPA Region 7:

Permit writers are responsible for the drafting of permits and the coordination and resolution of issues. Each permit drafted for facilities in Indian Country is reviewed by the Tribes and discussed with the applicant in order to identify any significant issues during the drafting process.

The NPDES permit writers work closely with other EPA programs, Tribes, States, and other agencies before the permit is placed on public notice. Consultation occurs with the Water Quality Management Branch, Water Enforcement Branch, and attorneys in the Office of Regional Counsel to discuss and exchange the necessary information on all Indian Country permits and enforcement-related matters. Inspections, assessments of receiving streams, technical assistance, and wastewater operator training are scheduled with the Environmental Services Division. Permit writers participate in the quarterly Regional meeting of Tribal environmental staff (Regional Operations Committee) as appropriate.

The Region has developed an NPDES Tribal Implementation Strategy which seeks to ensure that all permits in Indian Country are current by the end of fiscal year (FY) 2005.

4. Legal Authorities

EPA is conducting a comprehensive review of the State's legal authorities. This review has not yet been completed. As a result, EPA is reserving this section of the profile; when the legal reviews are complete, EPA will update profiles to include the results of the reviews.

5. Public Participation

An evaluation of the State's legal authorities regarding public participation will be included in the legal authority review. As noted above, the legal authority review section of this profile is reserved pending completion of the legal authority review.

The State of Iowa:

Public participation requirements for NPDES permits are included in State rules, 567 Iowa Administrative Code (IAC) 64. The IDNR requires the permittee to publish a public notice for the draft NPDES permit in the newspaper and submit proof of publication to the IDNR. All State rulemaking complies with the State Administrative Procedures Act, which requires public notice compatible with federal notice requirements. "Public" is defined as any interested person or group. Experience has shown that public comment and input can be very important. Occasionally, hearings are requested on proposed NPDES permits.

All NPDES documentation, including the draft permit, is available to the public. The IDNR Records Center maintains a public records viewing room, where files can be checked out for viewing and copying. The State maintains an NPDES Web site at <http://www.iowadnr.com/water/npdes/index.html>, which contains information on various aspects of the program. A list of NPDES individual permit holders is maintained on the site. The Web site is not used for posting public notices, notices of intent for general permits, or actual copies of individual permits. Copies of recently issued major permits and

fact sheets are posted at <http://cfpub.epa.gov/npdes/permitissuance/genpermits.cfm> on EPA's Web site. News letters, news releases, and other public information and education opportunities are developed by the IDNR's communications office. The public can access enforcement and compliance actions through the Envirofacts and the Enforcement and Compliance History Online (ECHO) Web-based databases.

EPA Region 7:

The public participation activities of the NPDES program in Region 7 are consistent with NPDES program regulatory requirements under the CWA. In addition, Region 7 publishes public notices of all individual permits in a local newspaper circulated in the geographic area of the discharge. A mailing list of interested parties is developed for each permit and detailed information is provided on where to send comments and public hearing requests. The Region also has a hotline with a toll-free number where citizens can call and report any environmental concerns. The public can access enforcement and compliance actions through the Envirofacts and ECHO Web-based databases.

6. Permit Issuance Management Strategy

The State of Iowa:

Iowa has a large number of NPDES permits. The Permit and Compliance System (PCS) [EPA's National data system for the NPDES permit program], as of 6/30/04, showed 128 major permits, 1,390 minor individual permits, and 316 facilities covered by non-stormwater general permits issued by the IDNR. This does not include more than 8,000 facilities covered by general permits that are not entered into PCS (those facilities covered by stormwater and discharging on-site systems general permits).

In 2000, the percent of current permits was decreasing (the backlog was increasing), with the percentage of current individual minor permits at 66% and current major permits at 75%. Information on the backlog from December 2003 shows that the percentage of current individual or general minor permits was 85% and the percentage of current major permits was 82%. As of December 31, 2004, the percentage of minor individual permits was 86%; 88% of minor facilities were covered by current individual or general permits, and the percentage of current major permits was 83%.³ In 2001, the Iowa legislature appropriated funds for contract assistance to reduce the backlog of expired NPDES permits. Four contract permit writers were hired for two years. Through this effort, the backlog was reduced. (At one time, current percentage of permits approached 90%.) However, the percentage of current permits has dropped recently with the expiration of the special appropriations and the loss of some regular permit writing staff. Recently, the IDNR gained a new status as a charter agency, which means that it no longer has an agency-wide FTE cap, which should make it easier to fill and keep full the IDNR's permit writing positions. Two of the contracted staff were made permanent State employees. Also, the permit writer vacancies, after some delay, have been filled. In September 2004, the IDNR conducted a process improvement effort aimed at streamlining the permitting process. Implementation of the process improvements identified should help to reduce the permit reissuance backlog and to maintain a 90% currency for all permits.

³ The National Data Sources column of the Management Report, measures #19 and #20, show 79.5% of major facilities and 87.4% of minor facilities, respectively, covered by current permits, based on data as of June 30, 2004.

An important aspect of the IDNR's program has been the increased use of general permits. Four general permits have been issued and are current. These permits include two stormwater permits (one for industrial activities and one for construction sites), a permit for quarries, and a permit for on-site systems that discharge. In the future, the IDNR may issue a general permit (or permits) for CAFOs and for small municipal lagoon systems.

Another important improvement is the National Pollution Discharge System (NPDS) computer system, a relational database maintained by the State, which allows permit writers to enter permit requirements (e.g., limits, monitoring and reporting requirements, compliance schedules) into the data system and electronically produce a NPDES permit. This system, which began operating in July 2003, has increased the ease of entering data needed to produce a permit, and provides much greater flexibility in managing permit-related data. Because of the innovations designed into the system, permit writers find it easier and quicker to draft permits, allowing more emphasis on permit quality and documentation.

Iowa does not have a large number of "stale" permits awaiting reissuance. Only one major facility and 22 minor facility permits have been expired for over five years. Iowa's list of priority permits includes 6 major permits that have been expired over 2 years and 54 minor permits that have been expired over 3 years. The IDNR has committed to reissuing all 6 major permits and 20 of the minor permits by the end of FY2005.

Table 1: Percentage of Facilities Covered by Current Permits in Iowa
(State-issued permits)

	2000	Nat'l Avg.	2001	Nat'l Avg.	2002	Nat'l Avg.	2003	Nat'l Avg.
Major Facilities	84%	74%	81%	76%	88%	83%	82%	84%
Minor Facilities Covered by Individual Permits	79%	69%	83%	73%	91%	79%	92%	81%
Minor Facilities Covered by Individual or General Non-Stormwater Permits	--	N/A	88%	N/A	87%	85%	85%	86%

Source: PCS, 12/31/00; 12/31/01; 12/31/02; 12/31/03. (The values in the National Data Sources column of the Management Report, measures #19 and #20, are PCS data as of 6/30/04.)

EPA Region 7:

Region 7 is the permitting authority for 3 NPDES dischargers located within Indian Country in Iowa. Two of these permits are presently expired. The third is a new discharge for which EPA Region 7 is drafting a permit. The Regional NPDES program is implementing a Tribal Permit Strategy in order to improve the effectiveness and efficiency for permit issuance in Indian Country. The strategy includes ongoing consultation with Tribes during the permit writing process. A key piece in the strategy called for the Region to conduct stream assessments to determine stream use categories below each discharger. When drafting permits, the Region is including appropriate water quality-based effluent limitations (WQBELs) in permits in Indian Country. The strategy's goal is to ensure that all Indian Country permits will be updated and current by the end of FY2005.

Region 7 also issued the NPDES permit for a major municipal permit in Iowa, after objecting to its re-issuance by the IDNR. That permit is now expired. The IDNR will reissue this permit during 2005 (it is on the priority permits list).

7. Data Management

The State of Iowa:

The IDNR maintains a personal computer-based data system called the NPDS, which is used to issue NPDES permits and track compliance. The State uses NPDS rather than PCS as its primary NPDES management tool. All required Water Enforcement National Data Base (WENDB) data that are entered into the State's NPDS system are converted to Extensible Markup Language files and transferred to PCS via EPA's Interim Data Exchange Format (IDEF) - Central Data Exchange (CDX) system. Most WENDB data elements are transferred to PCS from the State system for both major and minor individual permitted facilities. A few WENDB data elements that are missing are being addressed by IDNR at the time of permit reissuance. Examples include missing facility addresses and latitude and longitude information for pipes. IDNR has recently caught up on meta data elements such as datum, method, scale, and descriptions which had been missing earlier.

Iowa uses its system, which maintains an inventory of all individually permitted facilities (both major and minor facilities), to focus on permit, enforcement, and inspection data and to ensure that accurate data is entered in a timely manner. The data is reviewed and corrected, if necessary, as part of the permit renewal and issuance process, or when inspections or other reviews identify errors.

The State collects latitude and longitude data at the facility and pipe level, and enters this information into PCS. The IDNR uses TOPOZONE to acquire the data and enter them into its NPDS system, which then uploads to PCS. The facility or pipe location shown on the 2002 aerial photograph from the Iowa Geographic Image Map Server is compared with the TOPOZONE map location to verify the location of each facility and pipe. Priority stream segments and watersheds are also inventoried on the IDNR's Geographic Information System and are linked to the regulated facilities via ArcView.

The State's NPDS system allows users to write and issue individual NPDES permits. After the permits are drafted on NPDS, all the required WENDB data elements that are in the NPDS system are sent directly to PCS through weekly updates. The NPDS system can generate reports from other State data systems that are used for tracking general permits such as stormwater and State operating permits for livestock confinement operations. An Excel spread sheet is used to track authorized city pretreatment program information (in addition to the information that is put into PCS). For pretreatment industries outside of pretreatment program cities, the State's NPDS system is used to track treatment agreements between the industry and the city (which are included in the city's NPDES permit for its sewage treatment plant).

Communities with combined sewer systems and combined sewer overflows (CSOs) are tracked with a list of the communities and their CSO permit and implementation status. This tracking list is updated periodically. All constructed overflow points, including CSOs and sanitary sewer overflows (SSOs), are listed in the permit, and can be tracked through NPDS and PCS as outfalls.

EPA Region 7:

Region 7 uses PCS to track basic permit and compliance information for major and minor facilities, including SSOs and CSOs, stormwater, CAFOs, pretreatment, and biosolids. Region 7 uses the Integrated Compliance Information System (ICIS) to track inspection and case conclusion data sheet information, verify enforcement data, and record tips and complaints received by the Region. The Online Tracking Information System (OTIS) and Envirofacts pull data from PCS to update each database.

Enforcement Coordinator's quarterly noncompliance reports (QNCRs) are retrieved from PCS looking for major facilities in significant noncompliance (SNC), as well as the enforcement actions being issued to address the facilities in SNC. Region 7 also checks how long facilities have been in SNC status.

The Region enters all WENDB data elements for EPA-issued permits. The Region collects and enters into PCS the latitude and longitude data for facilities, but not outfalls. Region 7 always checks the PCS audit reports to ensure that the data are accurately captured in PCS and that the data are entered into PCS as soon as they are received, so further processing can be completed.

Section II. Program Implementation

1. Permit Quality

The State of Iowa:

IDNR's permit writers use a checklist system, which ensures that the permit has gone through quality checks and the required regulatory steps. Permit quality and consistency had been ensured by having every draft individual permit or permit modification reviewed by a senior environmental specialist who has many years of experience in the program. A recent evaluation of the permit issuance process by the IDNR has resulted in new permit issuance procedures. Now permit writers are responsible for the issuance of the permits assigned to them with no formal review. It is anticipated that this will result in timelier issuance/reissuance of permits. The permit writer in the Wastewater Operations Section is responsible for developing technology-based effluent limitations (TBELs). Wasteload allocations (WLAs) and WQBELs are calculated by staff in the Water Resources Section and incorporated into the permit by the permit writer.

Region 7 receives copies of all public notices from the IDNR, along with draft permits for major facility discharges, applications, and fact sheets. However, in recent years, very little "real-time" review by Region 7 of Iowa major permits has occurred due to resource constraints. The Region conducts an on-site review of the NPDES program at least once every four years. (The last review was in 2001.) During this review, random files for permits issued within the last year are reviewed for both major and minor facilities. A Regional checklist is used during the file review. Findings in the 2001 review concluded that permit documentation should be improved, particularly as it relates to the permit writer's best professional judgment for effluent limits. The EPA headquarters permit quality review conducted in 2000 - 2001 also highlighted that permit documentation (fact sheets and statements of basis) should be improved.

All major NPDES permits contain toxicity limits and require whole effluent toxicity (WET) testing. WET requirements are put in minor permits on a case-by-case basis, based on reasonable potential to cause an excursion above the narrative criteria in the water quality standards (WQS). The WET requirements are based on protection of narrative WQSs, which protect against acutely toxic conditions in all waters. Failure of a WET test triggers increased frequency of monitoring. A toxicity reduction evaluation is automatic upon failure of two successive WET tests or three of five tests. Sublethal effects are not considered. Since the IDNR has many numeric WQSs and has been putting ammonia effluent limits in publicly owned treatment works (POTW) permits for years, there has been a low incidence of positive WET tests in Iowa. The results of WET testing are reported on permittees' discharge monitoring reports (DMRs), and evaluated for compliance against the permit WET limits.

The State does not have a training program for WET.

EPA Region 7:

The Region 7 permit quality assurance efforts are based on an extensive review process. All permits undergo an internal peer review using the experts in the Regional office that have extensive experience in writing NPDES permits. All staff members involved in writing and/or reviewing permits have

attended the EPA Permit Writers' Training Course. The permits are also reviewed by the Regional water quality staff, Regional Public Affairs Office, and the Office of Regional Counsel to ensure that all required program elements under the CWA are met. This includes the use of checklists by each permit writer. In addition, each receiving stream is evaluated by the Regional Environmental Services Division to determine the appropriate use categories and provide a basis for WQBELs.

2. Pretreatment

The State of Iowa:

Long before EPA developed the pretreatment program, Iowa was regulating "major contributing industries" under its own program. When Iowa received authorization for the pretreatment program on June 3, 1981, the IDNR modified its definition of significant industrial user (SIU) to include all non-categorical industries between 25,000 and 50,000 gallons per day. Virtually all (98.6%) the SIUs in Iowa have control mechanisms, consisting either of permits issued by POTWs with approved pretreatment programs or treatment agreements issued by the State through the receiving POTW's NPDES permit. IDNR identifies SIUs through several means, including direct contacts by SIUs, information supplied by POTWs, NPDES applications, on-site investigations, and citizen contacts. For the period ending June 30, 2004, only 2 of 58 industries were in SNC.

The State has already identified and approved 21 POTW pretreatment programs. No additional POTW program development is anticipated.

Collectively, the IDNR and EPA Region 7 audit or conduct a pretreatment compliance inspection (PCI) of each approved POTW pretreatment programs every year. The State's 21 approved programs are easily audited at least once every five years, the balance of inspections during that time being PCIs.

EPA Region 7:

Since Iowa has authorization to administer the pretreatment program, the Region does not directly implement or routinely interface with SIUs located in the approved or non-pretreatment (program) cities. Although the Region does inspect and sample a number of industrial facilities in all four Regional states during the year, permit issuance is left to the State.

The Region actively participates in audits in each state. Historically, the region has conducted between 20 and 24 PCIs or audits per year region-wide. Between EPA and the States, each approved program receives at least one audit every five years.

3. Concentrated Animal Feeding Operations

The State of Iowa:

The IDNR has a large number of NPDES permits to issue in response to the revised CAFO Rule. Since the IDNR has had a non-NPDES State regulatory program in place for most newly defined CAFOs (total confinement operations), the State's database for that program was queried to obtain the number of animal feeding operations in Iowa that are newly defined CAFOs under the revised CAFO Rule, totaling 1,633 operations. In addition, there are approximately 200 open lot CAFOs that are considered existing operations under the old regulations. The EPA furnished contractor assistance in determining what

regulation changes would be necessary to bring Iowa's regulatory authority in line with the revised CAFO Rule.

The IDNR had recommended that legislation be passed to specifically enable the IDNR to make changes to the State livestock regulations in response to the EPA's revised CAFO Rule. That legislation did not pass during the spring 2004 session. The IDNR is proceeding to draft the changes to their CAFO regulations, based on existing, more general regulatory authorities, with the goal of having them in place soon. A general permit is planned to be developed by September 2005 that will cover most of the newly defined CAFOs (most confinement operations). Individual permits are issued to open lot CAFOs, and may also be issued to some confinement operations, if there are special conditions that require individual permits.

The IDNR and the Natural Resources Conservation Service have reached consensus that one nutrient management plan should meet the requirements of both the State and the United States Department of Agriculture (USDA). The IDNR currently has a requirement for a manure management plan, including use of a P index, for total confinement operations. Plans are reviewed and approved by the IDNR, but do not have to be developed by a certified planner. The IDNR has also adopted the revised the EPA CAFO Effluent Limitations Guidelines (ELGs) by reference in the annual update of ELGs. Other amendments to Iowa's CAFO program were put to public notice in September 2004. As proposed, the State Technical Standards will be a combination of the P-Index regulations and provisions within the amendments.

The IDNR had not placed a priority on the issuance of NPDES permits to CAFOs in Iowa. As a result, many open feedlots were out of compliance with the EPA and State requirements for control of runoff. With Region 7's encouragement, the Iowa Open Feedlot Plan was started by the IDNR in March 2001. It called for a registration of open lots, an evaluation and prioritization by the IDNR, and issuance of NPDES permits. The goal is to have all this accomplished and all open feedlot CAFOs in compliance by April 1, 2006. One-hundred seventy-five open lots with 1,000 head or greater have registered. Currently, the IDNR has issued 46 NPDES permits for open lots.

Note: The above CAFO permit numbers and program dates are taken from the 3rd quarter 2004 CAFO Rule Implementation Report, or are based on more recent information from the IDNR.

EPA Region 7:

There are no known CAFOs within Indian Country in Iowa.

4. Stormwater

The State of Iowa:

Both of the State's Phase I municipal separate storm sewer systems (MS4s) [Des Moines and Cedar Rapids] have been permitted. Industrial facilities, including construction sites, are covered by current general permits. Iowa has issued a general permit for Phase II construction and is in the process of issuing individual permits to all Phase II MS4s, with a goal of having all the Phase II MS4s permitted by

the end of calendar year 2004. As of March 31, 2005, 40 of the 42 MS4 Phase II permits had been issued.⁴

Notices of Intent for stormwater general permits are tracked electronically in a State database. Name, authorization number, location, and the covered activity are included.

EPA Region 7:

The Region has a general stormwater permit for construction activities in place to cover sites over one acre in Indian Country. There are no construction sites in Iowa that are currently covered by the general permit. If any industrial facilities require a stormwater permit, they will be permitted individually. There are no MS4s in Indian Country in Iowa.

5. Combined Sewer Overflows/Sanitary Sewer Overflows

The State of Iowa:

Iowa now has 11 CSO communities. Since the original CSO inventory in 1998, seven cities have successfully eliminated their combined sewers and have been removed from the list of CSO communities. Permits for eight of the remaining eleven CSO communities require implementation of the nine minimum controls and development of long term control plans (LTCPs). Two permits include schedules for sewer separation and elimination of the CSOs. One very small community still needs CSO conditions included in its permit. The combined sewer operational plan required in each community's permit must provide for public notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts. The LTCPs are under development and are required to be submitted in accordance with the enforceable NPDES permit compliance schedule dates. One LTCP has been submitted to date. None of the LTCPs have been approved by Iowa.

Iowa NPDES permits for municipalities list locations of any constructed overflow point, including SSOs. Overflow reporting is treated in the same way as a bypass, with reports received at the IDNR field offices, either through the requirement for 24-hour reporting or on the discharge monitoring report. Public notification needs are determined on a case-by-case basis, depending on whether a public health threat exists.

SSOs are evaluated during the permit drafting process and corrections for "problem" sewer systems are addressed in the permit. Problems may include excessive infiltration and inflow (I/I), frequency of overflows, and WQS violations. Capacity, Management, Operation, and Maintenance (CMOM) is not a regulatory requirement, but corrections may be addressed through enforcement of the "proper operation" language in the permit. Iowa design standards for new sewers require capacity for the peak hourly wet weather flow. This is defined as "flow received when the domestic, commercial, and industrial flows are at their peak; the ground water is high; and run-off is occurring from a storm event of two inches of rainfall in one hour."

⁴ The National Data Sources column of the Management Report, measure #30, shows no Phase II MS4 permits issued, 40 not drafted, and 5 drafted. This is based on information as of July 1, 2004.

EPA Region 7:

There are no CSOs or SSOs in Indian Country.

6. BiosolidsThe State of Iowa:

The Biosolids program authorization has not been granted to Iowa, but the State may seek formal authorization of the program. The IDNR handles the day-to-day management of the 40 code of federal regulations (CFR) part 503 biosolids program, investigates complaints, reviews annual reports, and submits the results of these reports to Region 7. State rules, which parallel the 40 CFR part 503 federal regulations, are cited in NPDES permits.

EPA is responsible for enforcement activities associated with the 40 CFR part 503 regulations.

Almost all facilities in Iowa apply treated biosolids as an agricultural fertilizer.

EPA Region 7:

None of the four Region 7 states have authorization to administer the 40 CFR part 503 biosolids programs, so the Region retains primacy in all States. Each State runs a parallel program based on State law and each includes language in NPDES permits that requires compliance with part 503.

Biosolids requirements are included in Region 7 issued permits (mostly within Indian Country).

The Regional biosolids program is administered by one coordinator who devotes about ¼ FTE to the program. Biosolids requirements are included in Regionally-issued permits for facilities in Indian Country. Compliance with the biosolids requirements is ensured through review of the annual reports required of major facilities, and by the issuance of enforcement actions against those that fail to submit a report. Many minor facilities also send a copy of their annual reports to the Region. These are all reviewed for compliance with program requirements. Appropriate enforcement action is pursued if the annual report (or a citizen complaint) reveals that program requirements are not being met. Tracking is done manually. Approximately 70 percent of biosolids are land-applied or distributed for use.

Section III. NPDES Compliance Monitoring and Enforcement Response

In a separate initiative, EPA's Office of Enforcement and Compliance Assurance (OECA), EPA Regions, and the Environmental Council of the States have developed a tool for assessing State performance in enforcement and compliance assurance to ensure that States meet agreed-upon minimum performance levels and provide a consistent level of environmental and public health protection nationwide. OECA will use the State profiles to focus these efforts and identify areas needing further discussion and evaluation.

1. Enforcement Program

The State of Iowa:

Iowa relies on DMRs and inspections to identify facilities that are in violation of the permit conditions. The enforcement team, in consultation with the counsel and the field staff, determines the proper enforcement action that includes Administrative Orders (AOs), referral to the Iowa Attorney General's (AG) Office, and referral to EPA. IAC 567, Chapter 10 requires the IDNR to consider culpability, gravity, and economic benefit in calculating administrative penalties. At present, Iowa law sets a maximum figure of not more than \$10,000 on the administrative assessment of penalties (see Iowa Code section 455B.109). The Iowa AG may seek civil penalties of \$5,000 per day per violation (see Iowa Code Section 455B.191).

The IDNR issued a total of 104 NPDES administrative and judicial actions over the last three years (based on the IDNR's Legal Data Base for Enforcement). The following numbers reflect the total enforcement actions for the calendar years 2001, 2002 and 2003.⁵

Table 2: Total Enforcement Actions

Year	No. of Administrative Orders /Administrative Penalty Orders	Referral AG Office
2001	39	1
2002	34	3
2003	31	2

Iowa has few written enforcement procedures (Iowa prefers to call them procedures rather than policies). They include procedures that address manure management plans for confined animal feeding operations and the handling of fish kills.

⁵ The Management Report measures #37 and #38, which show 27 total formal enforcement actions, are for fiscal year 2003, not calendar year 2003.

Iowa's supplemental environmental projects (SEPs) procedure covers some elements of the EPA's SEP policy. However, the current limit of \$10,000 placed by the State on administrative penalties does not allow implementation of major SEPs. SEPs are used in settlement at the AG's office. Enforcement actions, including SEPs, are tracked by the data stored at the central location and Regional offices located throughout the State.

The administrative penalty amount for NPDES enforcement program is as follows:

<u>Year</u>	<u>Penalty Amount</u>
2001	\$135,550
2002	\$157,650
2003	\$133,500

The total of administrative penalties for all programs is approximately \$400,000 per year. The IDNR should develop a comprehensive penalty policy, including a SEP policy that is consistent with the EPA's goals. The DNR also should have a system that would enable tracking of penalties for various programs.

All major facilities in Iowa that meet the criteria for SNC status will be subjected to formal enforcement action (FEA) including AOs. The IDNR is in the process of developing a matrix that will help decide the kind of enforcement action needed and to ensure that proper penalties are assessed. The economic benefits portion of the total penalty is always recovered, while the gravity portion may be negotiated. A deadline for completion of this matrix should be established.

The percent of major facilities in SNC at any time during the year in Iowa is on par with the national average. However, while the national average is showing a decreasing trend (25% in 2000 to 20% in 2003), the IDNR's percentage did not decrease (21% in 2000, 26% in 2001, 24% in 2002, and 21% in 2003). The IDNR needs to review its policies and make modifications to improve the percentage of facilities in compliance.

Region 7 is meeting with the IDNR during the spring of 2005 to discuss water enforcement issues. The IDNR and the Region will discuss reasons behind the lack of improvement in the percentage of major facilities in SNC. Other areas for discussions include the need to develop a comprehensive enforcement and penalty policy matrix for penalty assessment and SEP policies that will meet the EPA's goals.

The State uses the following criteria in targeting CAFO's for enforcement: damage to the environment; results from stream sampling; topography and soil types; high ground water levels; fish kills; and response to State inquiries (sent to permit holders, normally in response to citizen complaints). The IDNR needs to develop a formal document clearly defining the criteria to be used in targeting enforcement.

The IDNR estimates that there are over 1,800 CAFOs that need permits under the NPDES CAFO Rule. At present, NPDES permits have been issued for 46 open feedlots. No confinement operations have been issued NPDES permits. More than 1,600 of these CAFOs are "confinement operations" where no discharge should occur and where State-mandated "manure management plans" are already required. Because there may be a significant number of CAFOs that do not have permits, the IDNR should aggressively implement an outreach program.

EPA Region 7:

Region 7's NPDES enforcement program includes approximately seven staff positions devoted to NPDES enforcement and one staff position devoted to data entry into PCS. This includes staff involved with inspection targeting; review and evaluation of inspection reports; oversight of State enforcement programs; enforcement orders; State program assistance; responding to citizen complaints; enforcement case development; negotiation of enforcement cases; and tracking and evaluation of SEP, schedules, and deliverables required by orders.

The Region formally targets inspections to investigate facilities that have the greatest potential for noncompliance. The Region also identifies noncompliant facilities according to national and Regional priorities. Inspection reports are reviewed to determine if an enforcement action is required. The Region has worked diligently and will continue to aggressively pursue appropriate enforcement actions against noncompliant facilities.

Region 7 uses the Interim Clean Water Act Settlement Penalty Policy to determine the penalties for violations in each enforcement action. The EPA considers economic benefit and the ability to pay in determining penalties on a case-by-case basis.

The Office of Enforcement and Compliance Assurance (OECA) Regional trend data shows a decrease in the number of new SNC facilities in the Region, an increase in the number of those facilities addressed by formal enforcement actions, and an increase in the number of those facilities that returned to compliance on their own.

Table 3: Regional SNC Trend Data

Year (7/1-6/30)	No. of New SNC Facilities at the beginning of the Year (7/1-6/30) Regional Total	Percentage of SNC Facilities Addressed with FEA (10/1-9/30) Regional Total	Percent of SNC Facilities Returned to Compliance on Their Own (10/1-9/30) Regional Total
2001	109	8%	78%
2002	108	10%	80%
2003	67	14%	82%

Based on the OECA trend data, NPDES major facilities in SNC in Region 7 have generally decreased from 123 in 2001 to 95 in 2002 to 67 in 2003. The Region will include reporting of noncompliant major facilities on the QNCR in its quarterly review with the States, and discuss any concerns to ensure the continued lowering of major SNC facilities.

2. Record Keeping and Reporting

The State of Iowa:

The IDNR keeps up-to-date and accurate information on each permittee. Information is kept in an electronic spreadsheet and each spreadsheet is tailor-made to each facility. The data not only includes the summary data typically captured by PCS, but all daily data reported by the facility, and an electronic

copy of the spreadsheet is kept at the IDNR. IDNR's new NPDS, which was released in June of 2003, has the capability to write and issue individual NPDES permits. Once the permits are drafted in NPDS, WENDB data elements are sent directly to PCS through weekly updates. One of the IDNR's field offices has taken the lead in electronic DMR data submission by submitting 70% of their DMRs electronically, which has greatly reduced staff time and improved data quality. The IDNR's other field offices have the capability to receive electronic DMRs from their permitted facilities, but to a great extent have not utilized this feature.

The IDNR also has powerful report generation capability which allows the State to generate many types of reports, not only from the State's NPDS, but also from the State's stormwater, quarry, individual home waste system, and general permit databases. The IDNR is looking at using the new system to do the QNCR instead of using ICIS-NPDES when it becomes available in February of 2006. IDNR will not be direct users of the new ICIS-NPDES; they will continue to upload their data to PCS. After the release of ICIS-NPDES, IDNR will continue providing their data to EPA.

IDNR faces a reoccurring problem in uploading data to PCS using the IDEF. IDNR submits their files, receives confirmation the files were received, and later is told that their files did not make it into PCS during the last PCS update. The State does not receive an audit report telling them why their data was rejected by PCS, but instead has to wait until they receive notification as to what the problem is. Sometimes there is a mapping error which needs to be fixed at EPA Headquarters, or there is a problem with the submitted data. (WENDB data elements do eventually get entered.) IDNR's difficulty in getting data uploaded to PCS has interfered with their ability to complete the QNCR in a timely fashion.

EPA Region 7:

Region 7 keeps up-to-date and accurate information on the permittees for which it is responsible. Data are stored in PCS and hardcopy files for each permittee. The Region uses PCS to store basic facility information, address, outfall data, parameters and permit limits, discharge monitoring report data, bypass and CSO reports, a summary of the schedule of compliance items, and completion dates. Hard copy files are divided into permit-related topics, inspections, discharge monitoring reports and bypasses/CSO reports, and other miscellaneous topics (such as those related to requests and approvals for collection system extensions). Enforcement files contain necessary information to defend against subsequent appeals or court actions.

Region 7 uses PCS as one of its tools to manage its NPDES program. Region 7 inputs directly into PCS all of its enforcement actions, inspections, facility information, limits, outfall data, and permit issuance and expiration dates. Region 7 is confident that data quality will improve with the release of the new ICIS-NPDES. The new system is much more functional than the current form of PCS. ICIS-NPDES will be more intuitive and have a modernized approach for entering NPDES data.

3. Inspections

The State of Iowa:

NPDES permit holders that are municipal and industrial wastewater treatment facilities (WWTFs) are routinely inspected, with major facilities inspected on a biennial basis and minor facilities on a less frequent basis. All NPDES-permitted WWTFs are required to conduct specific effluent monitoring and submit the data to the IDNR. The data are reviewed by field staff. If there are any violations or

questionable data, the facility is brought to the forefront for inspection, the timing of which is dependent on the severity of the violation.

Stormwater inspections are primarily driven by complaints, as the weather plays a large part in problems that occur. The IDNR is targeting certain agencies, such as the Iowa Department of Transportation (IDOT) and some developers, for routine inspections.

The IDNR considers risk to the environment and public health when reviewing daily monitoring data submitted by the permittees, and in determining whether an inspection is warranted. In responding to complaints from the public, the IDNR is, in effect, responding to what is perceived by the public to be a threat to the environment or public health.

In the past, the IDNR had a goal of inspecting all CAFOs once every three years. However, due to the increase in the number of CAFOs and IDNR's limited resources, the new goal is to inspect all CAFOs once every four years.

EPA Region 7:

Region 7 uses numerous criteria when selecting targets for inspections such as history of noncompliance, potential for environmental harm, citizen complaints, State requests, impaired water bodies, environmental justice concerns, watershed impacts, and Regional and national initiatives. Targets are selected to address and prevent environmental harm. The Region also prioritizes wet-weather issues in its core program. Wet-weather has been a national priority for EPA the past few years and Region 7 has focused inspections resources on meeting this priority.

The Region 7 targeting team shares the inspection list each year with the State and requests comments on it from the State.

Inspection of major facilities does not occur once every year because of the combined resource limitations faced by both Region 7 and its four states. Minor facilities may not get inspected once every five years because of similar resource constraints.

4. Compliance Assistance

The State of Iowa:

The IDNR's principal method of technical assistance is providing help through on-site visits, emails, and telephone contacts. Training grant funds provided under CWA section (g)(1) are used to provide on-site training and technical assistance for municipalities through the State training center. The IDNR has an operator training and certification program. That program coordinates training efforts by IDNR staff and third parties offering other training throughout the State. The IDNR staff presents at trade association meetings and participates in professional organizations.

The State encourages pollution prevention and other innovative tools for achieving and maintaining compliance. The IDNR's Pollution Prevention Services and Intern Program provide technical assistance in identifying and implementing pollution prevention opportunities and environmental management systems.

Section IV. Related Water Programs and Environmental Outcomes

1. Monitoring

The State of Iowa:

Iowa currently does not have a monitoring program that satisfies all ten elements included in “Elements of a State Water Quality Monitoring Program Guidance” (EPA document #841-B-03-003). However, the State Monitoring Strategy does address all 10 elements. IDNR is making progress, and if the strategy is fully implemented, substantial improvement in Iowa’s monitoring program will be achieved. The Performance Partnership Grant work plan with the State includes the monitoring program. The State’s monitoring program uses a statistical approach and includes statewide monitoring on an annual basis. While the monitoring program is not currently capable of providing background calculations for all NPDES permits in the State, it does provide representative information that can be used for most of the facilities.

2. Environmental Outcomes

The State of Iowa:

Iowa has 71,665 miles of streams and 133,666 acres of lakes and reservoirs [source: 2000 CWA section 305(b) report]. For the 2000 water quality inventory report prepared under CWA section 305(b), 5,725 miles of streams were assessed for aquatic life use; 1,892 miles were assessed for fish consumption; and 836 miles were assessed for recreation. For the 2000 section 305(b) report, 82,814 acres of lakes and reservoirs were assessed for aquatic life use; 51,218 acres were assessed for fish consumption; and 63,774 acres were assessed for recreation.

Table 4: Status of Iowa’s Assessed Waters
(from 2000 305(b) report)

Year (7/1-6/30)	Aquatic life use		Fish consumption		Swimming	
	% of waters assessed	% of waters assessed that are impaired	% of waters assessed	% of waters assessed that are impaired	% of waters assessed	% of waters assessed that are impaired
2001	8%	26%	3%	0%	1%	52%
2002	62%	23%	38%	1%	48%	9%

Iowa maintains a fixed-station monitoring program supplemented with special studies.

EPA Region 7:

Currently, no Tribes in Region 7 have federally approved WQSs. Additional technical support and funding are needed to aid in the development of monitoring plans, quality assurance and quality control development, and the collection of data used to support assessments. Also, federal regulations currently

exempt Tribes from CWA section 305(b) assessment reporting requirements. Currently, assessments of Indian Country waters are not a planned activity, except at receiving streams for NPDES permitted dischargers (Tribal and non-Tribal entities) that are located within the external boundaries of a Tribal reservation.

3. Water Quality Standards

The State of Iowa:

In Iowa, some staff responsibilities overlap between the permits program, WLA development, and/or WQS program. Currently, Iowa includes, as part of the WQS development/triennial review process, a technical advisory committee (which has evolved to be a stakeholder committee, not just for technical input) and a public comment period in their rulemaking process.

WQSS contain narrative and numeric criteria including, among others, bacteria and new human health criteria (e.g., mercury). Narrative criteria can be difficult to implement due to a lack of translators (e.g., nutrients, esthetically objectionable conditions). Although Iowa is adopting single-number maximum criteria for bacteria, making assessments based upon the criteria may be challenging due to a lack of monitoring for assessment purposes. Iowa has adopted rules that specify the procedures to calculate the WLAs and water quality based effluent limits for NPDES permits. State regulations allow compliance schedules for meeting WQBELs.

A review of a State's WQS are required by the CWA to be completed at least once every three years. Iowa last completed a triennial report in 1990. Currently, Iowa is conducting a triennial review. Iowa's current triennial review splits the revision of Iowa WQS into phases, addressing a subset of related items in each phase. Coordination with Iowa's NPDES program is facilitated through staff whose responsibilities overlap the permits program, WLA development, and WQS program.

Consistent with EPA's 1986 recommendations, Iowa adopted E. coli as a replacement for fecal coliform as part of Iowa's most recent phase of its triennial review. Region 7 reviewed and approved Iowa's adoption of E. coli on June 16, 2004. Although Iowa has not developed translators for nutrients (phosphorus and nitrogen), Iowa has developed a draft plan to develop nutrient criteria and submitted this plan to Region 7 on June 28, 2004.

Region 7 and Iowa are working together during the triennial review process. There is an outstanding WQS disapproval action from a previous triennial review in Iowa. The EPA and the IDNR are working together to resolve the three issues identified in that disapproval action. The State has committed to several timelines to resolve various issues within Iowa's WQS including: (1) a Use Attainability Analysis (UAA) protocol and a field plan for completing UAAs on selected waters; (2) antidegradation implementation procedures; (3) Iowa's use of protected flow; and (4) criteria for general use waters. The State's timeline calls for the revised WQS to be final in Summer 2006.

EPA Region 7:

Currently, no Tribes in Region 7 have authorized WQS programs.

A Regional team has been developed to address/identify appropriate WQBELs for NPDES permit development purposes in Indian Country for Tribes that do not have an authorized WQS program. This

team includes the Region's WQS program, NPDES program, Indian Programs Office, Environmental Services Division (lab), and the Office of Regional Counsel. A protocol to identify roles and responsibilities in the NPDES process (e.g., WQS, UAAs, CWA 401 certification, WLAs, NPDES development) has been developed.

4. Total Maximum Daily Loads

The State of Iowa:

The IDNR's process for NPDES permits considers both the TBELs and WQBELs. The IDNR has adopted rules that specify the procedures to calculate WLAs and WQBELs necessary to protect and comply with Iowa's WQSS. The basis and supporting calculations of each WLA and WQBEL are prepared by the IDNR's staff in a summary technical document for each discharger. To date, all WQBELs are established to comply with the WQS downstream of the discharger on an individual basis or pursuant to a WLA among dischargers impacting that stream segment. The established TMDLs are fully met by the WQBEL for the normal (near-field) WLA.

Water Resources Section staff provide the WLAs and WQBELs for each discharger to the permit writer. The IDNR NPDES permit writing staff use the most current WQBELs to establish permit limits when they are more stringent than the applicable technology based limits. All WQBEL documentation is included in the permit rationale.

The IDNR has not yet tracked NPDES permits that are implementing TMDLs because only one TMDL has been completed that has a significant point-source component (four others have small point source components). Currently, all permits are tracked using the PCS system and the State NPDS system. Permits that are implementing TMDLs can be identified through the NPDS database.

Iowa has 35 TMDLs approved from the 1998 list; 17 additional TMDLs have been submitted and approved since 2003. The IDNR has submitted a schedule for TMDL completion which meets the requirements of the 2001 Consent Decree.

IDNR is writing water quality-based permits that implement State standards and criteria for facilities discharging to waterways listed as impaired under CWA section 303(d) without an approved TMDL.

EPA Region 7:

There are no specific federal TMDL activities planned in Indian Country because of the lack of water quality assessments and established WQSS.

5. Safe Drinking Water Act

The State of Iowa:

When establishing criteria for water supply uses, the WQS program may consult with the Water Supply program about how monitoring/assessment determinations are made. Iowa takes drinking water intakes into consideration in the development of standards, WLAs, and WQBELs to the extent that Iowa's WQS do not allow mixing zones to overlap a water supply intake.

EPA Region 7:

The drinking water program is consulted to provide information and to review permits where there are concerns related to drinking water sources and wellhead protection areas. Where it is appropriate to protect drinking water sources and certain recreational uses, the Regional NPDES permits require disinfection.

Section V. Other Program Highlights

The State of Iowa:

The IDNR's new NPDS computer system began operating in July 2003. This PC-based system is accessible to all the IDNR's permit writers, inspectors, and enforcement staff. It is used both to write permits and to track compliance.

The State has increased its use of general permits, now with over 8,000 facilities covered by general permits.

All data required to be submitted to the IDNR in a permit must be analyzed by a laboratory certified to perform the analysis. There are currently 174 labs in Iowa and throughout the country that are certified to perform wastewater analysis for clients in Iowa. The certification program includes an annual proficiency demonstration, inspections, and quality control.

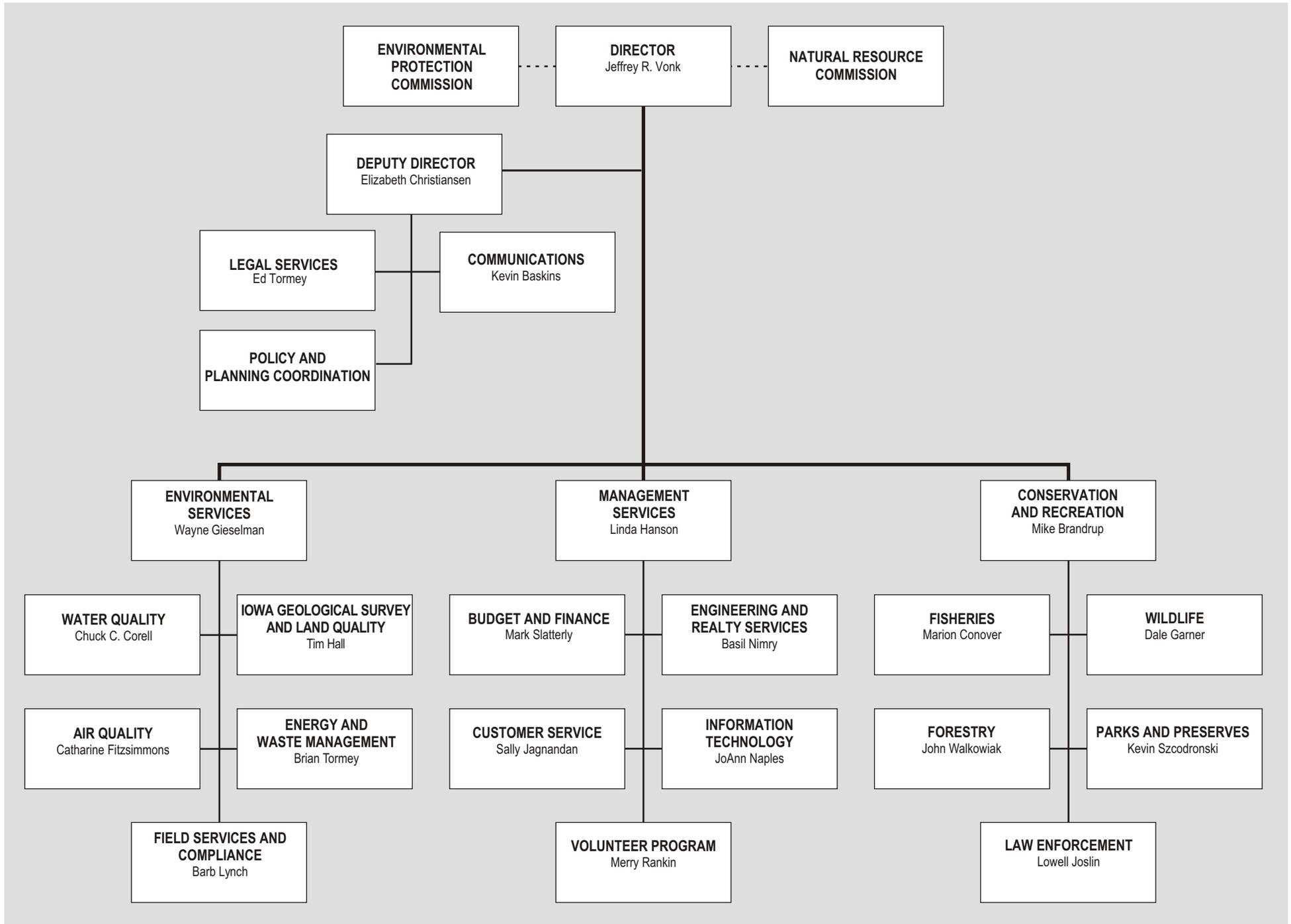
A construction permit issued by the IDNR is required for all wastewater treatment plant construction.

EPA Region 7:

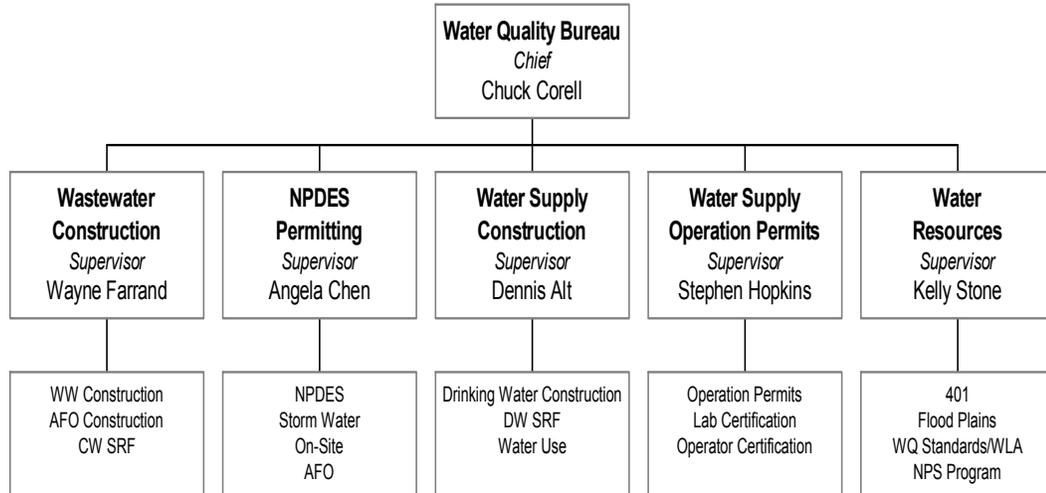
The Region has successfully worked with the Tribes to evaluate each receiving stream location to determine the appropriate use categories. This information is used only to establish WQBELs.



Department of Natural Resources



IDNR Water Quality Bureau



WATER, WETLANDS, & PESTICIDES DIVISION (WWPD)

REGION 7 ORGANIZATIONAL STRUCTURE

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("*" = Detail, "***" = Acting)

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DRINKING WATER
MANAGEMENT
BRANCH (DRWM)

Includes the following programs and activities:

- UIC
- Public Water Supervision System (PWSS)
- Source Water Protection (Surface & Groundwater)
- PWSS Implementation within Indian Country
- State/Tribal Grants

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Ted Fritz	
	Jack Kelly- SEE (IA)

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WASTE WATER &
INFRASTRUCTURE
MANAGEMENT
BRANCH
(WIMB)

Includes the following programs and activities:

- Management of all aspects of:
 - Clean Water SRF
 - Safe Drinking Water SRF
- Construction Grants:
 - Title II of the CWA
- NPDES Permits (Incl industrial, municipal, CAFO, stormwater CSO/SSO); State Assistance & Oversight
- Issuance of Permits within Indian Country; 104g Operator Assistance Grants, O& M Awards

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Nancy Healy	Ralph Summers
Kimberly Hill	Rao Surampalli
Victor Lyke	Joyce Sousley

Gerald Memming- SEE
Daniel Rebeck- SEE

Luetta Flournoy
x7653
PESTICIDES BRANCH
(PEST)

Includes the following programs and activities:

- Worker Protection
- Endangered Species
- State Management Plan
- Applicator Certification
- State/Tribal Grants
- Pesticide Stewardship
- Compliance Assistance
- Enforcement

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Elizabeth Murtagh-Yaw	Mary Jane Wingett
Kristie Raymond	

Lou Banks- SEE
Glenn Kramer- SEE

Diane Huffman
x7544
WATER
ENFORCEMENT
BRANCH (WENF)

Includes the following enforcement programs and activities:

- NPDES
- CAFOs
- CSO / SSO
- Drinking Water PWSS
- Storm Water
- Wetlands/Section 104
- Review/Approval/Disapproval of Local POTW Pretreatment Proposals

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Dewayne Knott	Stephen Pollard
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WATER QUALITY
MANAGEMENT
BRANCH (WQMB)

Includes the following programs and activities:

- Impaired Waters/303d
- Water Quality Standards
- TMDL management

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Ann Lavaty	Larry Shepard
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x7936
WATERSHED PLANNING
&
IMPLEMENTATION
BRANCH (WPIB)

Includes the following programs and activities:

- Water Program Integration
- Watershed Coordination
- Grants Management [604(b)/106/PPG/104(b)(3)
- 305 (b) Reports/Monitoring
- Water Quality Cooperative Agreements (WQCA)
- Wetlands/404
- Big Rivers
- Nonpoint Sources Management

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Don Hamera	Mandy Techau

Kenneth Bruene- SEE
Carl Stevens- SEE

NPDES Management Report, Spring 2005

Iowa

			Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
						State Activities	EPA Activities	State Activities	EPA Activities
NPDES Progress									
Universe	1	# major facilities (6,690 total)	I.1		n/a	127	1		
	2	# minor facilities covered by individual permits (42,057 total)	I.1		n/a	1,390	2		3
	3	# minor facilities covered by non-storm water general permits (39,183 total)	I.1		n/a	316	0	4,299	
	4	# priority permits (TBD)	I.6			--	--		
	5	# pipes at facilities covered by individual permits (142,761 total)	I.7		n/a	2,850	--		
	6	# industrial facilities covered by individual permits (32,505 total)	I.1		n/a	733	1		
	7	# POTWs covered by individual permits (15,197 total)	I.1		n/a	776	2		
	8	# pretreatment programs (1,482 total)	II.2		n/a	21	--		
	9	# Significant Industrial Users (SIUs) discharging to pretreatment programs (22,158 total)	II.2		n/a	220	--		
	10	# Combined Sewer Overflow (CSO) permittees (831 total)	II.5		n/a	11	--		
	11	# CAFOs (current and est. future) (17,672 total)	II.3		n/a	1,833	--		
	12	# biosolids facilities (TBD '05)	II.6			--	--		
NPDES Program Administration	13	State or Region assessment of State NPDES program (none (N)/assessment (A)/profile (P))	I.1	50 states 2004	n/a	A, P	P		
	14	% pipes at facilities covered by individual permits w/ lat/long in PCS	I.7		46.3%	48.4%	--		
	15	State CAFO legal authority expected (mo/yr)	II.3	2005	n/a	2/05	n/a		
	16	# Withdrawal petitions/legal challenges (22 total)	I.4		n/a	0	n/a		
	17	DMR data entry rate	I.7		95%	100%	--		
	18	# permit applications pending (1,011 total)	I.6		n/a	54	--		
NPDES Program Implementation	19	% major facilities covered by current permits	I.6	90%	83.7%	79.5%	0.0%	82.8%	
	20	% minor facilities covered by current individual or non-storm water general permits	I.6	90% 12/04	87.0%	87.4%	0.0%	88.3%	
	21	# major facilities w/permits expired >10 yrs. (56 total)	I.6		n/a	0	0		
	22	% priority permits issued as scheduled (TBD '05)	I.6	95% 2005		--	--		
	23	% pretreatment programs inspected/audited during 5 yr. inspection period	II.2		85.3%	100.0%	--		
	24	% SIUs w/control mechanisms	II.2		99.2%	98.6%	--		
	25	% of CSO permittees with long-term control plans developed or required	II.5	75% 2008	82.2%	91.0%	--		
	26	% CAFOs covered by NPDES permits	II.3		35%	2%	--		
	27	% biosolids facilities that have satisfied part 503 requirements (TBD '05)	II.6			--	--		
	28	# Phase I storm water permits issued but not current (76 total)	II.4		n/a	0	0		
	29	# Phase I storm water permits not yet issued (5 total)	II.4		n/a	0	0		
	30	Phase II storm water small MS4 permits current (Y/N/D (draft)) (35 States)	II.4	100% states 2008	n/a	0/40/5	n/a	40/2/0	
	31	Phase II storm water construction permit current (Y/N/D (draft)) (49 States)	II.4	100% states 2008	n/a	Y	Y		
NPDES Compliance Monitoring and Enforcement Response	32	% major facilities inspected	III.3		71%	66%	7%		
	33	(inspections at minors) / (total inspections at majors and minors)	III.3		76%	80%	25%		
	34	% major facilities in significant non-compliance (SNC)	III.1		20%	21%	--		
	35	% SNCS addressed by formal enforcement action (FEA)	III.1		14%	27%	--		
	36	% SNCS returned to compliance w/o FEA	III.1		70%	73%	--		
	37	# FEAs at major facilities (666 total)	III.1		n/a	10	0		
	38	# FEAs at minor facilities (1,660 total)	III.1		n/a	17	0		

Explanation of Column Headers:

Profile Section: For each measure, this column lists the section of the profile where the program area (including any additional data for the measure) is discussed.

National Data Sources: The information in these two columns is drawn from two types of sources:

(1) EPA-managed databases of record for the national water program, such as PCS, the National Assessment Database, and the National TMDL Tracking System. NPDES authorities are responsible for populating PCS with required data elements and for assuring the quality of the data. EPA is working to phase in full use of NAD and NNTS as national databases.

(2) Other tracking information maintained by EPA Headquarters for program areas such as CAFOs, CSOs, and storm water.

The [definitions document](#) accompanying this Management Report provides a detailed definition of each data element in the National Data Sources columns.

Additional Data: These columns provide additional data in cases where information from other data sources differs from information in the National Data Sources column for reasons such as different timing of the data "snapshot." Additional data should generally adhere to the same narrative definitions as data in the National Data Sources, and should be derived using similar processes and criteria. Our goal is to work with the States on these discrepancies to ensure consistent and accurate reporting. A State contact is available who can respond to queries. The profiles discuss each additional data element.

State Activities: Information in these columns reflects activities conducted by the State program. (Shaded cells in these columns indicate that the work may not be entirely the State's responsibility, but a breakdown of the data into EPA and State responsibilities is unavailable.)

EPA Activities: Information in these columns reflects activities conducted by the EPA Region within the State.

NPDES Management Report, Spring 2005

Iowa

		Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
					State Activities	EPA Activities	State Activities	EPA Activities
Water Quality Progress								
Universe	39	River/stream miles (3,419,857 total)	IV.2		n/a	71,665	n/a	
	40	Lake acres (27,775,301 total)	IV.2		n/a	133,666	n/a	
	41	Total # TMDLs in docket at end of FY 2003 (52,795 total)	IV.4		n/a	220	--	
	42	# TMDLs committed to in FY 2003 management agreement (2,435 total)	IV.4		n/a	16	0	
	43	# Watersheds (2,341 total)	IV.2		n/a	--	--	
Water Quality Administration	44	On-time Water Quality Standards (WQS) triennial review completed (42 States)	IV.3		n/a	N	n/a	
	45	# WQS submissions that have not been fully acted on after 90 days (32 total)	IV.3	<25% submis-sions	n/a	n/a	0	
Water Quality Implementation	46	State is implementing a comprehensive monitoring strategy (Y/N) (TBD)	IV.1	all states 2005	--	--	--	
	47	% river/stream miles assessed for recreation	IV.2		13.8%	1.2%	n/a	
	48	% river/stream miles assessed for aquatic life	IV.2		22.0%	8.0%	n/a	
	49	% lake acres assessed for recreation	IV.2		49.4%	62.0%	n/a	
	50	% lake acres assessed for aquatic life	IV.2		48.5%	47.7%	n/a	
	51	# outstanding WQS disapprovals (23 total)	IV.3		n/a	1	n/a	
	52	WQS for E. coli or enterococci for coastal recreational waters (12 States)	IV.3	35 states 2008	n/a	n/a	n/a	
	53	WQS for nutrients or Nutrient Criteria Plan in place (13 States)	IV.3	25 states 2008	n/a	N	n/a	
	54	Cumulative # TMDLs completed through FY 2003 (10,807 total)	IV.4		n/a	35	--	
	55	# TMDLs completed in FY 2003 (2,929 total)	IV.4		n/a	13	0	
Environmental Outcomes	56	# TMDLs completed through FY 2003 that include at least one point source WLA (5,036 total)	IV.4		n/a	5	--	
	57	% Assessed river/stream miles impaired for swimming in 2000	IV.2		--	52.0%	n/a	
	58	% Assessed lake acres impaired for swimming in 2000	IV.2		--	9.0%	n/a	
	59	# Watersheds in which at least 20% of the water segments have been assessed and, of those assessed, 80% or more are meeting WQS (440 total)	IV.2	600 2008	n/a	--	--	

Explanation of Column Headers:

Profile Section: For each measure, this column lists the section of the profile where the program area (including any additional data for the measure) is discussed.

National Data Sources: The information in these two columns is drawn from two types of sources:

(1) EPA-managed databases of record for the national water program, such as PCS, the National Assessment Database, and the National TMDL Tracking System. NPDES authorities are responsible for populating PCS with required data elements and for assuring the quality of the data. EPA is working to phase in full use of NAD and NTTs as national databases.

(2) Other tracking information maintained by EPA Headquarters for program areas such as CAFOs, CSOs, and storm water.

The [definitions document](#) accompanying this Management Report provides a detailed definition of each data element in the National Data Sources columns.

Additional Data: These columns provide additional data in cases where information from other data sources differs from information in the National Data Sources column for reasons such as different timing of the data "snapshot." Additional data should generally adhere to the same narrative definitions as data in the National Data Sources, and should be derived using similar processes and criteria. Our goal is to work with the States on these discrepancies to ensure consistent and accurate reporting. A State contact is available who can respond to queries. The profiles discuss each additional data element.

State Activities: Information in these columns reflects activities conducted by the State program. (Shaded cells in these columns indicate that the work may not be entirely the State's responsibility, but a breakdown of the data into EPA and State responsibilities is unavailable.)

EPA Activities: Information in these columns reflects activities conducted by the EPA Region within the State.