"ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION"

ALASKA CAPACITY DEVELOPMENT STRATEGY

STATE OF ALASKA'S STRATEGY FOR IMPROVING THE TECHNICAL, MANAGERIAL, AND FINANCIAL CAPACITY OF PUBLIC DRINKING WATER SYSTEMS

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I. EXECUTIVE SUMMARY

This is Alaska's updated strategy to support, promote and improve the sustainability of Alaska's public drinking water systems. This Capacity Development Strategy is intended to provide a flexible implementation framework which meets Safe Drinking Water Act (SDWA) regulatory requirements and prepares systems to better meet future requirements, and enhance public health protection, while providing accountability and opportunities for targeted water system improvements.

A. CAPACITY DEVELOPMENT STRATEGY HISTORY

In 1999 and 2000, a Citizen Advisory Board (CAB) was convened to advise the Alaska Department of Environmental Conservation (DEC) on challenges and opportunities to improve the technical, managerial, and financial (TMF) capabilities of Alaska's public water systems. A *Report of Findings* (1999) presented the results of these meetings, and summarized 14 recommendations to improve and support TMF capabilities. The DEC Drinking Water Program finalized the State Capacity Development Strategy in 2000, based on the *Report of Findings*, public input, state and federal requirements, and departmental resources.

In 2005 Alaska began participation in the Area Wide Optimization Program (AWOP), an EPA-sponsored voluntary program that focuses on optimizing the performance of water systems, and minimizing the need for modifications and expansions to system infrastructure. The AWOP is a partnership of State, Federal and consulting representatives, who work collaboratively to develop effective, proactive, optimization tools, and processes for water system owners and operators as well as state regulatory staff and technical assistance providers. Implementation of these tools is based on a targeted, prioritized ranking of a water system's technical, managerial, and financial status. Alaska uses AWOP tools, methodologies, and resources to meet some of the SDWA public water system PWS capacity development requirements.

In January 2006, the DEC Drinking Water Program initiated development and implementation of the Technical Assistance Providers (TAP) Group. The first meeting for this Alaska PWS capacity development activity was on January 27, 2006. The TAP Group focuses individualized efforts of technical assistance providers and DEC Drinking Water Program staff on water systems who willing want to cooperate in achieving both compliance and public health protection for their drinking water system. Participants in the current TAP Group primarily include: DEC Drinking Water Program, Village Safe Water Program, and Operations Assistance Program; DCED Rural Utility Business Advisor (RUBA) Program; Alaska Native Tribal Health Consortium (ANTHC); Southeast Alaska Regional Health Corporation (SEARHC); Alaska Rural Water Association (ARWA); Alaska Training and Technical Assistance Center (ATTAC); and U.S. EPA.

After several years of changes in State and Federal requirements, changes in agency structure and resources, and experience implementing the original Strategy, an update to the original Strategy was

initiated. A new "Steering Committee" was convened, composed of public representatives, private consultants, and agency representatives. Meetings were held in March and April 2009. The goal of the Steering Committee was not to duplicate the efforts of the original *Report of Findings*, but to provide an opportunity for ongoing feedback on capacity development implementation opportunities and challenges.

B. COMPLIANCE WITH SDWA REQUIREMENTS

The 1996 SDWA Amendments included requirements for state drinking water primacy programs to prevent the creation of new nonviable community and non-transient non-community waterworks (PWS), and to develop a strategy to address the capacity of all existing waterworks. Section 1419 includes requirements for operator certification, and Section 1420 includes requirements for capacity development. Specifically, in developing the Capacity Development Strategy, the SDWA requires the State to consider five elements:

- Section 1420(c)(2)(A): Methods to Identify and Prioritize - the methods or criteria that the State will use to identify and prioritize the public water systems most in need of improving technical, managerial, and financial capacity.

- Section 1420(c)(2)(B): Factors operating in the State which impair or enhance capacity – a description of the institutional, regulatory, financial, tax, or legal factors at the Federal, State, or local level that encourage or impair capacity development.

- Section 1420(c)(2)(C): Use of State authority and resources – a description of how the State will use the authorities and resources of this title or other means to –

    - Assist public water system in complying with national primary drinking water regulations;

    - Encourage the development of partnerships between public water systems to enhance the technical, managerial, and financial capacity of the systems; and

    - Assist public water systems in the training and certification of operators.

- Section 1420(c)(2)(D): How the State will establish a baseline and measure improvements – a description of how the State will establish a baseline and measure improvements in capacity with respect to national primary drinking water regulations and State drinking water law.

- Section 1420(c)(2)(E): Identification of interested parties – an identification of the persons that have an interest in and are involved in the development and implementation of the capacity development strategy (including all appropriate agencies of Federal, State, and local governments, private and nonprofit public water systems, and public water system customers).

This Strategy update is reflective not only of agency and regulatory changes, but also reflective of a more established Alaska Capacity Development Program, and staff more experienced in capacity development initiatives. This Strategy specifies clear objectives, but allows for ongoing flexible implementation to match the changing needs of communities, agencies, regulations, workloads and available resources.

Appendix A of this Strategy includes an "Annual Capacity Development Report Template" that follows the structure of this document, and includes citations to the associated sections of the Federal requirements.

C. LEGAL AUTHORITY

The State of Alaska Statute 46.03.720 requires that prior to constructing, extending, installing or operating a public water system; plans must be submitted to the Department and approved in writing. State of Alaska regulations 18 AAC 80 addresses requirements for public water systems. 18 AAC 80.207 specifies capacity development requirements.

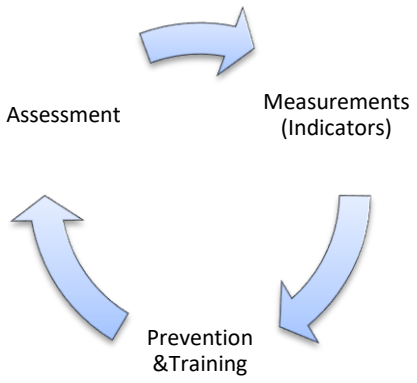
Additionally, new federal regulations (40 CFR 141 Subpart W) on surface water treatment incorporate many opportunities for additional treatment credits for public water systems that are operating in an optimized state. These rules also place a greater emphasis on technical, managerial, and financial capacity by ensuring accurate, meaningful monitoring, sampling and reporting; as well as the consistent, safe operations of existing systems, with well trained water system operations.

II. TARGETED STRATEGY IMPROVEMENTS

After implementing the original Capacity Development Strategy for over a decade, developing more experience with capacity development initiates, and meeting with community and system representatives and convening a Capacity Development Steering Committee, a new targeted approach was identified as a needed Strategy update. The targeted approach will be used in matching specific implementation tools to a system's needs, as discussed in the next section. But also, this same targeted approach will be applied to the Strategy itself, by regularly assessing the basic elements of the Strategy, and the tools that are being used to implement that Strategy.

Additionally, this "targeted approach" is guided by U.S. EPA's quarterly Enforcement Targeting Tool (ETT), formerly known as the Significant Noncompliers (SNC) List. DEC Drinking Water Program staff and TAP group members will focus on water systems with scores of ten or greater and follow U.S. EPA's Enforcement Response Policy (ERP) with technical and compliance assistance as the first step towards meeting SDWA requirements and increased public health protection. By providing a collaborative, goal based framework, with targeted improvements, the Strategy will be more flexible, and better able to meet changing political climates and resources, community needs, and regulatory requirements.

The targeted improvement based approach that was developed is summarized in the following graph.



Because Capacity Development is heavily reliant on coordination and collaboration, effective workgroups and partnerships are particularly important in supporting these basic Capacity Development Strategy elements. A solid Operator Assistance and Certification Program, coordination of TAP Group activities, consistent implementation of regulatory requirements, well trained staff as well as the consulting engineering community are major methodologies for addressing many, if not most, capacity development issues. The following methods will be used to address each of these Strategy elements, and provide ongoing support and evaluation of the Strategy.

A. COORDINATION

DEC addresses capacity issues with new, public waterworks by coordinating with planners, developers, management, engineering associations, operator boards, and funding representatives associated with the planning, development, and operation of new public water systems.

1. EPA CAPACITY DEVELOPMENT / OPERATOR CERTICATION

DEC may participate in EPA Capacity Development / Operator Certification workshops, including the Region 6-10 (Western States) workshops, the nationwide workshops, as well as special topic workgroups.

2. AGENCY MEETINGS, WORKSHOPS, AND TECHNICAL ASSISTANCE PROVIDERS (TAP) GROUP

DEC will participate in local meetings with State and Federal agency representatives (including ANTHC, RUBA, RCA) to better understand capacity development issues, other group's efforts in addressing those issues, and opportunities for more coordinated approaches. DEC Drinking Water Program are focused on renewed discussions for greater coordination on financial and asset management issues for water systems, primarily small water systems, to help them better achieve sustainability and long term public health protection and compliance.

3. MANAGEMENT / PLANNING MEETINGS AND PRESENTATIONS

DEC will participate in management and planning meetings with community leadership, to provide input on new rules, and requirements, to provide support for initiatives that promote improvements in Technical, Managerial, and Financial capacity, and to better understand the community issues and challenges.

B. ASSESSMENT

The Capacity Development Strategy will be reviewed and assessed regularly to identify the effectiveness of implementation tools, community needs, and changes in policies and regulations at both the state and federal level. Specific initiatives will be reviewed and developed each year, if necessary, to enhance the engineering plan review process. These implementation initiatives will be reviewed by EPA, and upon concurrence, documented in the annual Capacity Development Report Summary.

1. ALASKA CAPACITY DEVELOPMENT STEERING COMMITTEE

A Steering Committee meeting will be hosted by DEC bi-annually, to obtain feedback from the public, private and community representatives on Capacity Development challenges, to discuss ongoing implementation initiatives, and to discuss any new initiatives. Logistics for the meeting are

challenging due to the "geographic vastness" of Alaska and the limited access to many remote areas, which has made direct participation and input from the public difficult. The Steering Committee is an open committee of public representatives representing different sections of the Alaskan public, who can act as conduits back to the public that they represent.

2. ANNUAL EPA REVIEW

DEC Drinking Water Program staff will meet with EPA annually to review the past year's Capacity Development Report and to discuss any needed changes in the coming year. A Capacity Development Report Summary will be completed to document the coming year's goals.

MEASUREMENTS, PREVENTION, AND TRAINING

1. AWOP PARTICIPATION

The State of Alaska has been a participating member in the Area Wide Optimization Program (AWOP) since 2005; however this participation is limited. The resources and expertise provided by CPE training have better enabled DEC to meet capacity development "technical" requirements while maintaining staff training and expertise.

a) DEC may participate in AWOP Quarterly Meetings, remotely by phone, as workload, projects, and other constraints permit.

b) DEC may participate in EPA Region 10 Capacity Development Activities – including water system inspection activities such as a CPE, PBT, and as workgroup participants on issues such as monthly operator reports and training for new water treatment technologies, membrane testing and optimization, alternative water system operations and optimization, and disinfection-by-product control; as workload, projects, and other constraints permit.

c) DEC may participate in EPA/ASDWA national Capacity Development and AWOP conferences and workshops as workload, projects, and other constraints permit.

2. TECHNICAL ASSISTANCE PROVIDERS GROUP

The DEC Drinking Water Program initiated, routinely coordinates meetings, provides summaries of meetings, and has been a participating member of the TAP Group since 2006. The focused coordination of resources and expertise provided by TAP Group members to meet specific capacity development requirements for struggling Alaska PWS on the ETT List further supplements the technical skills developed from AWOP participation.

a) DEC DW Program will use the engineering plan review process as a link between compliance and water system sustainability for selection of potential water system participants using ETT scores.

b) TAP Group will focus on providing technical, managerial, and financial assistance and guidance to PWS with high ETT scores who are willing to commit to achieving long term compliance and public health protection.

3. SUSTAINABILITY

DEC DW Program will work with the Department of Natural Resources, Water Quality Section on updating and enhancing the current (2001) Memorandum of Understanding (MOU) between the state agencies with a renewed focus on water quality and quantity issues associated with Water Rights and Water Appropriations for new water systems and substantial modifications to existing systems.

a) DEC will focus training on Asset Management reviews and trainings, when necessary or requested, for water systems operators and owners for water system sustainability.

III. PROGRAM ELEMENTS

The following program elements form the basis for the capacity development oversight of individual public waterworks. The specific activities are tailored to meet the needs of each system.

This approach involves assessing capacity development issues, then developing indicators or measurements to evaluate and rank the issues, and finally developing a plan that not only addresses the immediate issue, but also to help prevent the recurrence of that issue through training and mentoring.

This pro-active approach has the additional benefit of preventing operational issues that could quickly become compliance problems, and potentially lead to enforcement. It also addresses public health risks that may not be effectively identified by required compliance monitoring alone or during the engineering plan review process.

A. NEW SYSTEMS

DEC addresses capacity issues with new proposed public waterworks by coordinating with planners, developers, owners, engineers, and funding representatives associated with the development and construction of new systems. For the purposes of this Strategy, public waterworks are considered "new" if the treatment works or design flows change by at least 80%, or the system is reclassified from a non-federally regulated system to a federally regulated system.

1. ENGINEERING

Engineering initiatives for new systems are intended to identify potential TMF issues, prior to a significant investment (staff time and funding) in the proposed water system, particularly the specified treatment technology. Pre-Application engineering meetings with the owner, engineer, and

any associated funding representatives are held at the early design stage to discuss the benefits and challenges to the proposed engineering solution.

After receiving final engineered plans for community and non-transient non-community systems, DEC will review the plans not only for their technical ability to meet proposed treatment and flow requirements, but also their financial and managerial information to determine if there are significant obstacles to sustainability based on the proposed system construction costs, operation costs, the income and fees that are proposed to support the system. DEC's engineering approval includes these capacity development criteria. The overall focus of the engineering review phase of a water system is to try and obtain enough information to reasonably determine the sustainability of a new water system or a project to modify an existing water system.

2. PLANNING AND MANAGEMENT

DEC will meet with local planning commissions, city administrators and local utility administrators to better understand the capacity development challenges, and to support and encourage initiatives that support improvements in sustainability.

3. COORDINATE WITH DEC DIVISION OF WATER PROGRAMS

DEC Drinking Water Program representatives will meet regularly with program leads from the Division of Water Operations Assistance Program, Municipal Grants and Loans Program, and Village Safe Water Program to coordinate capacity development efforts, identify opportunities to support mutual initiatives, and better help ensure effective water system capacity development criteria are met.

B. EXISTING SYSTEMS

Existing systems, including systems with less significant modifications, will be addressed for capacity development issues through the following initiatives.

1. ENGINEERING REVIEW

Engineering initiatives for existing water systems may identify current TMF issues, when this occurs staff provides technical assistance to the consulting engineer and water system owner prior to significant investment in the proposed modifications. After receiving final engineered plans for community and non-transient non-community systems, DEC will review the plans not only for their technical ability to meet proposed treatment and flow requirements, but also their financial and managerial information if there have been significant obstacles to sustainability for both compliance and public health protection in the past. The proposed system modification review may include construction costs, operation costs, the income and fees that are appropriate for the sustainability of the water system. DEC's engineering approval includes these capacity development criteria.

Existing surface water treatment systems will be ranked and scored based on the Drinking Water Program Status Component scoring protocol (attached in Appendix C). Status Component Inspections will be completed as needed to verify the operating conditions and the data reporting quality of the water systems. Engineering approval of public water system operations will include a system wide perspective, considering all components of a water system, not just those specific items being modified or replaced at a given point in time. A system wide approval addresses the total systems ability to meet all applicable State and Federal requirements for the public health protection of the residents and visitors served by the water system.

2. TMF ENGINEERING INSPECTION

The Drinking Water Program will maintain, depending on resources (funding and staff) the needed inspection skills and staff training necessary to conduct inspections such as Comprehensive Performance Evaluation (CPE), Comprehensive Technical Assistance (CTA), Filter Assessments, and Status Component Inspections (SCI). The focus of these inspections includes an evaluation of the status and treatment effectiveness of the system, the adequacy of managerial and financial policies, discussions with management and system owners of the technical requirements, and the maintenance of staff training and expertise.

CPEs (a requirement under the Long Term 1 Enhanced Surface Water Treatment Rule) and Filter Assessments may also be completed as regulatory triggered events, based on turbidity exceedences (CFR 141.563). Maintaining trained, skilled staff also improves the effectiveness of engineered plan review activities and technical water system problem solving. Therefore, the Drinking Water Program will also complete these training inspections as a method to educate and train water system staff. The Drinking Water Program will provide technical assistance inspections as needed to follow-up on previously identified TMF issues, and to assess the effectiveness of our inspection efforts and the overall engineering plan review process.

3. TMF WEB SUPPORT

The Drinking Water Program will maintain and support web resources that will provide information on financial and managerial tools, capacity assessments, and funding opportunities as Drinking Water Program resources allow.

4. SANITARY SURVEY INSPECTION

The Drinking Water Program will provide training and quality assurance and control (QA/QC) oversight of individuals approved as Sanitary Survey Inspectors and also the quality and timeliness of sanitary survey inspection reports.

5. TECHNICAL ASSISTANCE PROVIDER GROUP PARTICIPATION

The Drinking Water Program will participate and support the Technical Assistance Provider (TAP) workgroup business meetings which are typically held bi-monthly. Additional "one-on-one" focused workgroup meetings/teleconferences are scheduled as needed (weekly, several times a month, etc.) between a Drinking Water Program staff member (Environmental Program Specialist and Engineers), other TAP Group members, and water system operator and community representatives as everyone works on the compliance issues and increased public health protection. The ongoing goal of the TAP Group is to provide support for water systems, especially those on the EPA ETT List, that are having problems meeting the ongoing compliance requirements associated with public water systems by coordinating assistance efforts for long term water system sustainability.

6. MUNICIPAL GRANTS AND LOANS

The Drinking Water Program will coordinate with Municipal Grants and Loans on financial, managerial and technical issues associated with water systems seeking financial support. The Drinking Water Program will assist with grant and loan prioritization scoring by providing information on water system compliance status, and compliance needs, using the quarterly EPA ETT.

7. VILLAGE SAFE WATER

The Drinking Water Program will coordinate with Municipal Grants and Loans on financial, managerial and technical issues associated with Village Safe Water projects involving public water systems.

8. OPERATIONS ASSISTANCE

The Drinking Water Program will coordinate with the Operations Assistance Program (Operator Training and Certification, and Remote Maintenance Workers) to address operational concerns with public water systems.

IV. TRACKING AND REPORTING

The Drinking Water Program will continue to report Alaska PWS capacity development criteria and maintain data sufficient to prepare the required reports and to identify trends in water system operations. The goal of the PWS trend analysis is to identify struggling water systems before they exceed compliance limits, and identify opportunities to improve engineering plan review requirements to better prevent operational issues.

A template for an "Annual Capacity Development Report Summary" was developed concurrent to this Strategy, detailing specific reporting criteria and referencing required Capacity Development citations. This template addresses all the elements of this Strategy. However, the specific initiatives and associated indicators in the report will be adjusted as needed to accommodate community needs, and program concerns. The Annual Report and all proposed initiatives for that year, are reviewed annually (based on the federal fiscal year) and approved by EPA.

A. DATA

1. TRACKING

A database will be developed and maintained to track and report Alaska PWS capacity development activities.

2. TRENDS

Water system operational data will be graphed and reviewed to identify trends in operation that could impair water system operations, and potentially result in compliance exceedences (EPA ETT), and associated increased risk to public health.

B. REPORTING

1. 1420 (B)(2): ANNUAL CAPACITY DEVELOPMENT REPORT

An annual Capacity Development Report will be prepared annually, based on the capacity development activities completed within the federal fiscal year, as required by 1420(b)(2). This report will detail the capacity development efforts, and discuss their apparent effectiveness in improving the overall capacity of Alaska PWSs. This report may include information for the Annual Area Wide Optimization (AWOP) Report.

2. 1420(C)(3): TRI-ANNUAL GOVERNOR'S REPORT

A report will be provided to the Governor every 3 years, summarizing the capacity development efforts, successes, challenges, and the potential improvements to the Strategy initiatives.

3. 1420(B)(1): TRI-ANNUAL HISTORIC LIST

A report will be provided to EPA every three years, on community water systems, and non-transient non-community water systems that have a history of non-compliance, discussing the capacity development efforts that have been used to address their issues.

V. OTHER

The Drinking Water Program will take advantage of other opportunities to coordinate and enhance State of Alaska Capacity Development efforts to meet the goals expressed in this strategy. Additional opportunities may include:

- Coordinate with other entities and other project efforts to optimize our technical and compliance assistance efforts;

- Gain better knowledge of the technical, managerial, and financial status of public water systems, to better target and prioritize our efforts for long term sustainability from a more thorough and complete review of financial information and abetter understanding of asset management;

- Track capacity development data on public water systems and routinely make that data publicly available; and

- Develop a greater understanding of the engineered plan review process and approvals to PWS ETT scores.

APPENDIX A
TERMS, DEFINITIONS AND ACRONYMS

TERMS, DEFINITIONS AND ACRONYMS

ANTHC: Alaska Native Tribal Health Consortium – The Environmental Health and Engineering Division of this organization provides planning, design, construction and operations support for clean water and sanitation projects throughout Alaska.

ARWA: Alaska Rural Water Association – the Alaska branch of the National Rural Water Association, that provides water and wastewater systems with water and wastewater support services.

AWOP: Area Wide Optimization Program **-** an EPA sponsored program that focuses on optimizing the performance of water systems, and minimizing the need for modifications and expansions to system infrastructure. The AWOP is a partnership of State, Federal and consulting representatives, who work collaboratively to develop effective, proactive, optimization tools and processes.

Capacity: Refers to the capabilities required of a public water system in order to achieve and maintain compliance with the drinking water rules. It has three elements that are typically referred to as "TMF":

Technical: Technical capacity or capability means that the water system meets standards of engineering and structural integrity necessary to serve customer needs. Technically capable water systems are constructed, operated, and maintained according to accepted standards.

Managerial: Managerial capacity or capability means that the water system meets standards of engineering and structural integrity necessary to serve customer needs. Technically capable water systems are constructed, operated, and maintained according to accepted standards.

Financial: Financial capacity or capability means that he water system can raise and properly manage the money it needs to operate efficiently over the long term.

DEC: Department of Environmental Conservation - The State agency responsible for conserving, improving and protecting Alaska's natural resources and environment to enhance the health, safety, economic and social well-being of Alaskans. **Drinking Water Program:** The DEC Division of Environmental Health program that protects the health of the public and visitors to Alaska by regulating public water systems. This is the EPA primacy program for drinking water, and coordinates statewide capacity development efforts.

EFC: Environmental Finance Center at Boise State University – An organization that operates under a US EPA charter to provide assistance and assistance to States and communities on matters concerned with financial management and access to financial assistance.

MGL: Municipal Grants and Loans – This is a program within the Department of Environmental Conservation, Division of Water, that is responsible for overseeing infrastructure loan projects for public and privately owned waterworks.

New Public Water System: A water system is considered a "new" public water system if 80% or more of the total treatment for a regulated MCL, is modified, constructed, or re-constructed, or if the design flow changes by 80% or more, or if an existing non federally regulated system is reclassified to a federally regulated public water system. For the purposes of this document, this term only applies to wateterworks as defined below.

RCA: Regulatory Commission of Alaska - This State agency regulates public drinking water utilities, including privately owned public water systems.

Report of Findings: a 1999 report based on Citizens Advisory Board Meetings which discuss the Alaska's Capacity Development challenges and opportunities for improvement.

RUBA: The Rural Utility Business Advisor – The Department of Commerce Community and Economic Development program that provides program, management assistance and financial training related to water and wastewater utilities in cities and villages in Alaska.

SDWA: The Safe Drinking Water Act – Passed by the US Congress in 1974 and amended in 1986 and 1996.

TAP: Technical Assistance Provider Group – A group of technical assistance providers including DEC, RUBA, ANTHC, ARWA, RCA that provide support for systems that are having problems meeting the ongoing compliance requirements associated with public water systems by coordinating assistance efforts.

Steering Committee: An advisory group of interested parties that provide input on capacity development issues and Strategy initiatives.

Sustainability: The long term ability to maintain TMF Capacity over the life of a system.

TMF: Technical, managerial and financial capacity, as defined under "capacity".

VSW: Village Safe Water – This DEC Division of Water program that works with rural Alaskan communities to develop sustainable sanitation facilities.

Waterworks: Federally regulated public water systems, including those privately and publically owned. Federally regulated public water systems serve 25 or more people per day for at least 60 days per year, or have at least 15 service connections.

APPENDIX B

ANNUAL CAPACITY DEVELOPMENT REPORT TEMPLATE

Annual Capacity Development Report Summary 2011

Activity		Citation	Goal	Actual	
Targeted Strategy Improvement					
Coordination and Training	AK Capacity Developments Steering Committee Meetings	1420(c)(2)(B) 1420(c)(2)(E)	Bi-Annual meeting, every other year	Done/Or Not	
	Participate in AWOP quarterly meetings.	1420(c)(2)(B)	2 via phone, 2 in person	## phone, ## in person	
	Participate in Region 10 AWOP activity (CPE, CTA, PBT, ..)	1420(c)(2)(A) 1420(c)(2)(B) 1420(c)(2)(D)	1 per year	Done/Or Not	
	Particpate in Bi-Annual Nationwide AWOP Workshop	1420(c)(2)(A) 1420(c)(2)(B) 1420(c)(2)(D)	Bi-Annual (odd years)	Done/Or Not	
	Participate in EPA Cap Dev / Op Cert workshop	1420(c)(2)(A) 1420(c)(2)(B) 1420(c)(2)(D)	Annual	Done/Or Not	*National Meetin
Outreach	Provide TMF management/ planning presentation(s), maintain and update web page.	1420(c)(2)(C)	1 ppt, ongoing web updates	## ppt	
	Participate in TMF conference/workshop with related Agencies (Sustainable Systems, Health Corporations, RCA, ANTHC, RUBA, Water Board, EFC Boise State)	1420(c)(2)(B) 1420(c)(2)(E)	As Available	##	
Program Elements					

APPENDIX C

STATUS COMPONENT SCORING PROTOCOL