



ASSOCIATION OF CLEAN WATER ADMINISTRATORS

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2018 ACWA Priorities Survey

26 States responded to this survey. The following topics/initiatives received a weighted score based on the number of states that selected the topics/initiatives as highest to lowest priority with in each program area.

<u>Monitoring</u>	<u>Score</u>
Source/Stressor Identification Methods for Biological Impairments	3.88
Emerging Contaminants Monitoring Methods	3.38
Continuous Monitoring Methods	3.00
Monitoring Case Studies and State to State Knowledge Transfer	2.83
Integration of State and National (NARS) Probabilistic Monitoring Designs and Data	2.36

Potential Additional Topics:

- HAB Monitoring
- Groundwater Monitoring
- Monitoring Trends Nationally
- Database Access, Integration, and Management
- Nonpoint Source Monitoring Success Stories
- Citizen Science/Volunteer Monitoring
- Data management and Access
- Permittee Monitoring Collaborative Networks
- Sustainable Funding Mechanisms
- Comparing Data from Multiple Monitoring Programs
- Periodic Updates from ORD

<u>Water Quality Standards</u>	<u>Score</u>
Development of Robust Implementation Guidance for New Criteria	5.09
Cyanotoxins Recreational Criteria/Advisory	4.63
Development of A Prioritization List for National Standards	4.42
Variances and Updated Variance Guidance	4.20
Criteria Development for Emerging Contaminants	4.00
Lake Numeric Nutrient Criteria	3.21
Aluminum Criteria Development	3.08

Potential Additional Topics:

- Numeric Nutrient Criteria for Coastal Waters
- Site Specific Nutrient Criteria
- Recreational Criteria
- Biologand Model for Copper
- Ammonia Criteria Implementation
- ESA Coordination - Minimum Requirements
- Pathogens
- Dissolved Minerals
- Implementation of Emerging Contaminants
- Human Health Frequency & Duration Report
- Centralized Reference Area for EPA Criteria Development



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<u>Assessment</u>	<u>Score</u>
Development of New Tools for the Assessment Process	4.45
Listing and Delisting Requirements	4.29
Data Management for Diverse Water Quality Databases	3.61
Assessment Protocols for High Frequency Data	3.42
Use of 3rd Party Data for Assessment	2.91
Integrating Targeted and Probabilistic Data	2.61

Potential Additional Topics:

- No More New EPA Guidance on Assessment

<u>Watershed Protection and TMDLs</u>	<u>Score</u>
How States Contextualize/Communicate Progress on Impaired Waters w/wo EPA Metrics	5.68
State TMDL Implementation Generally	5.50
Nutrient TMDL Design and Implementation	4.84
TMDL Modeling - Improving Integration of Modeling into State TMDL Programs	4.60
Bacteria TMDL Design and Implementation	4.54
Implementing Protection of Healthy Waters	4.04
Working with EPA to Maximize Effectiveness of New ATTAINS in Communication Efforts	3.96
Water Quality Trading	3.12

Potential Additional Topics:

- Regional TMDLs (chloride and mercury)
- Chloride TMDLs in general
- TMDLs for Multi-Agency Waterbodies
- Restoration Plans (alternative to TMDL)
- Dealing with Natural Conditions
- Getting Timely Action from EPA on submitted TMDLs
- Coordinating TMDL, NPS, and NEP Project Funding, Planning and Implementation
- ATTAINS Needs Greater Functionality for Integrated Reporting
- New Point Sources in Impaired Waters (W/wo approved TMDLs)

<u>Nonpoint Source</u>	<u>Score</u>
Urban Stormwater Management - What Other States Have Done Successfully	5.11
Ag Stormwater Management - What Other States Have Done Successfully	5.07
Measuring Success of NPS BMPs, Watershed Plans, NPSMPs, etc.	5.04
Innovative Funding for BMPs	4.15
Nonpoint Source Management Plans: Creating/Revising/Updating Them	3.62
Improving Partnerships for NPS Management	3.58
Impact of Natural Hazards on NPS Projects	1.60

Potential Additional Topics:

- Urban Stormwater Management for Stream Protection
- National Agricultural BMP Load Reduction Research Database
- Removing Barriers Between Nonpoint and Point Sources
- §319 Funding
- Historical Mining Impacts
- Stormwater as a Water Supply Resource



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<u>NPDES/Permitting</u>	<u>Score</u>
Proposed NPDES Updates Rule	7.44
Stormwater Program Implementation	7.28
Antibacksliding Implementation	7.08
Permitting Oversight, Permit Quality Review	6.76
Sanitary Sewer Overflow (SSO), Peak Flows, Blending	6.36
Pretreatment Program Implementation	5.52
316(b)/Steam Electric Program Implementation	4.88
CAFO Program Implementation	4.16
Biosolids Program Implementation	3.92
Pesticide Permitting Program Implementation	2.96

Potential Additional Topics:

- EPA Training for Industrial Stormwater Permitting
- Limits Lower than Available Treatment Technologies
- Factoring in Natural Background into Limits Development
- Ambient Data Collection (QAPP/SAP)
- Copper BLM Implementation
- Aluminum Implementation
- Point to Point Trading
- Watershed Permitting
- Methods for Compliance when WQS lower than those methods
- Groundwater Discharges Should be Regulated Under NPDES
- Pretreatment Monitoring for SIUs by Control/Approval Authority (i.e. State)
- Funding for eReporting Requirements
- Greater Funding for §106
- Increasing NPDES Fees

<u>Inspections, Compliance, and Enforcement</u>	<u>Score</u>
Improving Compliance Rates	8.14
Streamlining/Modernizing Data Reporting	8.10
NPDES eReporting Rule Implementation	7.08
Innovative Compliance Assistance and Enforcement Approaches	5.90
Compliance Monitoring Strategy	5.88
Redefining Significant Non-Compliance	5.33
Advanced Monitoring and Pollution Detection Technologies	4.38
Oversight, State Review Framework	4.25
New Enforcement Framework - A Violation Scoring Initiative	3.48
Environmental Justice	3.35

Potential Additional Topics:

- Updated Penalty Guidance
- Compliance Inspector Training
- ICIS Enforcement Data Management
- State Pretreatment Program - Annually Sampling SIUs



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<u>Nutrients</u>	<u>Score</u>
Harmful Algal Blooms (HABs)	6.04
Nonpoint Source Management	5.15
Drinking Water	4.92
Technology Implementation (including Optimization)	4.77
Water Quality Standards for Nutrients	4.68
TMDLs for Nutrients	4.39
Monitoring for Nutrients	3.96
Small Facilities/Lagoons	3.29

Potential Additional Topics:

- Narrative Criteria Translator to Numeric Criteria
- Funding Point Source Nutrient Program Implementation
- Variance for Nutrients When Communities Cannot Afford Lower Numbers

Other Potential Pollutants to Focus on:

- Polychlorinated biphenyl (PCBs)
- Perfluorooctanoic acid (PFOAs)
- Mercury
- Ammonia

<u>Other Cross Cutting Topics</u>	<u>Score</u>
Federal Investment in State Programs (106, 319, BEACH, SRF, etc.)	6.29
Federal Oversight of State Programs (SRF, PQR, WQS Review, TMDL Review)	4.30
Coregulator Collaboration	4.25
Infrastructure Funding	4.18
Improving Consistency between EPA Regions in CWA Program Areas	3.55
Permit Streamlining and LEAN Initiatives	3.18
Federal Preemption of State Programs (401 certification, 404 program authorization)	2.75

Potential Additional Topics:

- Wet weather Standards
- CWA and ESA Integration
- Redefining Infrastructure

<u>Prioritizing CWA Programs</u>	<u>Score</u>
NPDES/Permitting	6.86
Water Quality Standards	6.00
Nutrients	5.75
Watershed Protection and TMDLs	5.67
Inspections, Compliance, and Enforcement	5.20
Assessment	4.95
Monitoring	4.84
Nonpoint Source	4.65
Other Cross Cutting Topics	2.41

Potential Additional Topics:

- More Technical Assistance