

Sample State Informational Letter

[NOTE: Include Attachment C (PQR Advance Questionnaire) and Attachment J (PQR Opening Interview Questions) with this letter. The PQR SOPs contain the attachments.]

Dear [Appropriate State NPDES Permit Manager],

Thank you for agreeing to host EPA for the Program and Permit Quality Review (PQR) state visit on [dates]. PQRs assess how a permitting authority implements the National Pollution Discharge Elimination System (NPDES) Program requirements. PQRs include a site visit, interviews about the program and permitting processes, and permit and administrative record reviews. Through the PQR, EPA will identify and recommend action items for improving NPDES permit development and NPDES program implementation. By using a standard procedure to assess each NPDES permitting program, PQRs promote national consistency.

We will be visiting your office for [insert #] days. While there, we will review permits, fact sheets, and administrative records, and discuss the program with you and your staff. A draft itinerary for our visit is enclosed.

For the PQR site visit, we typically request the following:

- Conference room to accommodate [insert total # of people] (list included on agenda);
- Administrative files for the permits being reviewed as part of the PQR;
- Availability of your program and permit staff to answer questions that may arise;
- Responses in advance to the PQR Advance Questionnaire (Attachment C, enclosed);
- Verbal responses to the PQR Opening Interview Questions (Attachment J, enclosed) during the site visit.

What to Expect

EPA will conduct a desktop review of permits and applications before the state visit. Thank you for sending the permits, fact sheets, and [insert other materials provided, e.g., applications] for this portion of the review.

The meeting typically begins with an interview session with you and key permit staff to discuss permit writers' considerations for writing permits and developing permit records. We will discuss your responses to the PQR Advance Questionnaire that you will send EPA prior to the site visit. During the opening interview, we will ask you the questions contained in the PQR Opening Interview Questions, and we will welcome any additional information on your NPDES program's highlights, priorities, initiatives, and challenges. We will also discuss your program's permit development process.

Following the interview, EPA will review the requested permit files (as well as any other outlying files you would like us to review). It will be very helpful to have the files for the current permit available in the room. The permit file and administrative record generally contain the majority of the information needed for the file review. Other than some possible minor logistical support (e.g., locating copies of missing documents, etc.), EPA usually conducts file reviews without state staff present.

Following the file review, we may meet with senior technical permitting staff to ask follow-up questions regarding permit limit development, focusing on water quality-based and technology-based limit development. The visit will conclude with a discussion of our preliminary findings and will outline next steps.

We understand that you have very busy schedules and resource constraints and greatly appreciate your time preparing for and participating in the PQR. We look forward to seeing you on [insert Date ###]. If you have any questions, feel free to contact [insert EPA Regional PQR Contact name] at any time. Thank you again for taking the time to accommodate us for this review.

Sincerely,

[Name]
Chief, Water Permits Branch
EPA Region [##]

Enclosures:

- Draft Agenda and List of Probable EPA Attendees
- Attachment C - PQR Advance Questionnaire
- Attachment J - PQR Opening Interview Questions

Draft Agenda for PQR State Visit

EPA Staff Attending (*[insert total #]*):

[insert staff names, if known] (EPA Region ##), *[insert staff names, if known]* (EPA HQ); plus contractor support

Proposed Schedule (based on state workday):

Day 1:

9:00 am – 9:30 am	Introductions and schedule overview
9:30 am – 12:00 pm	Preliminary interview (see attached questions)
12:00 pm – 1:00 pm	Lunch
1:00 pm – 5:00 pm	File review

Day 2:

8:30 am – 9:00 am	Follow-up questions (technical follow-up based on file reviews)
9:00 am – 12:00 pm	File review (continued)
12:00 pm – 1:00 pm	Lunch
1:00 pm – 5:00 pm	File review (continued)

Day 3:

8:30 am – 9:00 am	Follow-up questions (technical follow-up based on file reviews)
9:00 am – 12:00 pm	File review (continued)
12:00 pm – 1:00 pm	Lunch
1:00 pm – 2:30 pm	Closing meeting