NPDES Program and Permit Quality Review (PQR) Standard Operating Procedures

Final

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Water Permits Division,

U.S. Environmental Protection Agency,

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Contents

I. BACKGROUND

National Pollutant Discharge Elimination System (NPDES) Program and Permit Quality Review (PQR) is an evaluation of a select set of NPDES permits and implementing procedures to determine whether permits are developed in a manner consistent with applicable requirements established in the Clean Water Act (CWA) and NPDES regulations. The evaluation compares the substantive and procedural requirements set out in relevant regulations (40 CFR 122 through 133, and 400 through 699) and guidance with the permit file documentation developed as part of permit issuance. PQRs serve to promote NPDES permit quality, ensure a reasonable degree of national consistency with regard to NPDES program requirements, and identify where NPDES permits keep pace with developments in the NPDES program regulations. PQRs are conducted under EPA's state program oversight and information collection authority.

Upon completion of the review, a PQR report is written that identifies state successes, challenges, and issues for improvement. The issues for improvement will be addressed collaboratively by EPA and states.

National PQRs conducted by EPA Regions began with a cycle of reviews conducted from FY2012-2017. Procedures for that cycle of reviews and the resulting reports can be found on EPA's PQR webpage[1].

II. PURPOSE

These *Standard Operating Procedures* (SOPs) are intended to serve as a user's guide and reference manual for staff from EPA Regions and Headquarters in coordinating and conducting NPDES PQRs conducted between FY2018-2022.

III. PQR Quick Guide

This PQR Quick Guide identifies the steps in the PQR process in the manner in which they are most commonly performed. The details and flexibilities within the PQR process are outlined in Part IV of this PQR SOP document.

Planning (at least two months prior to state visit)

- Identify PQR lead and any additional staff needed to conduct all elements of PQR
- Prior to conducting any portions of the review, meet internally to walk through the process and planned timing with all personnel in the EPA Region (and EPA Headquarters, if applicable) involved in the review process
- Select one or more Regional Topic Areas to review for the state, if applicable
- Select permits for review
    - ten (10) permits for Core Review (see PQR SOP Part IV, section 3.1)

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[1] https://www.epa.gov/npdes/npdes-program-management-and-oversight#pqr

- additional permits for National Topic Area reviews (see PQR SOP Attachments G, H, and I)
- additional permits for Regional Topic Area reviews (see PQR SOP Part IV, section 5.1)

- Send kickoff letter to the state (or equivalent communication such as formal meeting or conference call; *Sample State Informational Letter* is included as PQR SOP Attachment B)
- Send state *PQR Advance Questionnaire* (see PQR SOP Attachment C), and ask for response to be provided with enough time to review prior to the state visit
- Collect information on progress toward completing action items identified in prior PQR (see PQR SOP Part IV, section 2.2)
- Coordinate with state (and EPA Headquarters and/or Regional enforcement, if applicable) to establish dates for state visit

Review permits and fact sheets prior to state visit (desktop reviews)

- Review permits, fact sheets, and any other available background materials using the checklists
- Conduct National Topic Area reviews using materials for each topic (see PQR SOP Attachments G, H, and I)
- Conduct Regional Topic Area reviews (see PQR SOP Part IV, section 5.0), if applicable

State visit

- Review *State Visit Packet* (see PQR SOP Attachment K)
- Conduct initial interview (use *PQR Opening Interview Questions*, see PQR SOP Attachment J)
- Review files for Core Review permits in order to complete remainder of *Core Review Checklist* questions; may review files for National or Regional Topic Area permits if desired
- Conduct exit interview (for tips on conducting exit interview, see PQR SOP Part IV, section 6.4.1 or the *State Visit Packet*, PQR SOP Attachment K)

Report

- Establish a report development timeline to ensure sufficient time for development and review steps. Inform any reviewers (including EPA Headquarters) of anticipated review dates to ensure expedient reviews.
- Draft report using the *Report Template* (see PQR SOP Attachment L)
  - ☐ **Send EPA Headquarters** the draft report. The report must be reviewed by EPA Headquarters prior to sending to the state for review.
- EPA Headquarters reviews draft report and provides comments to Region (approximately 3 weeks)
- EPA Regions incorporate comments from EPA Headquarters
- Provide updated draft report to state for correction of factual inaccuracies

- Address state comments to produce draft final report
  - ☐ **Send EPA Headquarters** the draft final report if EPA Headquarters has requested second review.
- Provide final report to state
  - ☐ **Send EPA Headquarters** the final report.
- **EPA Headquarters posts** review results on the NPDES PQR web page.

If you have any clarifying questions at any point in the process, please contact your PQR coordinator at EPA Headquarters.

IV. NPDES PQR STANDARD OPERATING PROCEDURES

1.0 Planning for the FY2018–2022 PQR Cycle

Each EPA Region is expected to conduct a review of each of its NPDES authorized states within the five-year review cycle. EPA Headquarters will review programs in jurisdictions in which EPA implements the NPDES program. These reviews may be conducted in collaboration with EPA enforcement State Review Framework (SRF) reviews, if desired.

PQRs include reviewing a selection of permits issued by the state, visiting state office(s) to discuss permitting practices with state permitting managers and key staff and to review administrative files associated with the selected permits, and documenting findings in a formal report.

PQR planning should begin by identifying the appropriate staff to support the review. The PQR team generally consists of a PQR team lead and program experts who review permits for the core review and topic reviews. Staff on the PQR team should have prior NPDES permitting experience and general knowledge of the program. Staff tasked with topic reviews typically have additional specialized experience within the topical review programs.

At least two months prior to the PQR site visit, the team lead should arrange internal meetings with the PQR team staff and appropriate EPA Regional and Headquarters staff to discuss the general process and schedule.

The PQR Quick Guide (see PQR SOP, Part III) identifies the key steps of the PQR and may help you as you work through the review process.

1.1 PQR Planning Document

The *PQR Planning Document* (see PQR SOP Attachment A) is an optional tool that assists Regions in planning their review cycle. Regions have the flexibility to adjust the plan as necessary as the PQR cycle progresses. Developing and maintaining this document helps inform EPA Headquarters of the timing for reviews in the PQR cycle.

Regions should initiate communication with their states as early as possible to accommodate both Regional and state needs, and to begin an open and effective communication process.

2.0 Preparing for the State PQR

2.1 Pre-visit Planning

Once the dates of the state visit are decided, the Region should formally begin the PQR process by sending the *Sample State Informational Letter* (see PQR SOP Attachment B) or by engaging in equivalent communication (such as a meeting). The Region should request that the completed *PQR Advance Questionnaire* (see PQR SOP Attachment C) be returned with sufficient time for the Region to review prior to the state visit and ensure that each state has a complete set of PQR assessment materials to provide insight on the PQR process. If EPA Headquarters staff will be assisting Regional staff on any reviews, the Region should frequently communicate with the EPA Headquarters PQR leads.

The Region should also identify permits for review for the Core Review, National Topic Area reviews, and any Regional Topic Area reviews. Use of a permit selection spreadsheet, such as the sample provided in Appendix 2, can aid this process. Most Regions conduct desktop reviews of the permit materials that are available to them prior to visiting the state. If necessary, the Region should request additional documents from the state to conduct desktop reviews for these PQR components. See Part IV, sections 3.1 and 5.1, as well as PQR SOP Attachments E, F, G, H, and I for more detail on materials needed; see Part IV, section 3.2 for information on conducting desktop reviews.

The Region should also initiate a review of Action Items from the PQR conducted during the FY2012-2017 PQR cycle.

2.2 Review of Action Items from the Previous PQR Cycle

The PQR should include an update of action items identified during the previous PQR cycle. These updates can inform EPA reviewers as they review the state's program. The action item review is also intended to provide continuity between PQR cycles and document actions the state has taken to improve their NPDES program where required or recommended by EPA in a PQR report. EPA reviewers should conduct this part of the review prior to the state visit.

During the FY2012–2017 PQR cycle, EPA referred to action items that address deficiencies or noncompliance with federal regulations as "Category 1." EPA is now referring to these action items going forward as "Essential." In addition, previous PQR reports identified recommendations to strengthen the state's program as either "Category 2" or "Category 3" action items. EPA is consolidating these two categories of action items into a single category: "Recommended."

For the purposes of reviewing state progress, the updated categories are being used. All Action Items identified as Category 2 or Category 3 in the previous PQR report should be combined into the updated Recommended category.

Materials Needed for Review

- *Action Item Review Forms*: (see PQR SOP Attachment D) Regions may use these tools to gather and organize the information needed to complete the PQR report. Regions are free to use other methods, provided that the information gathered is sufficient to prepare the PQR report.

- *Action Item Report from EPA Headquarters*: Regions are required to report twice annually to EPA Headquarters regarding the states' progress on Essential Action Items as a Government Performance and Results Act (GPRA) measure. The Regional NPDES Branch Chief or EPA Headquarters Action Item Manager can provide the tracking reports.

- *PQR Report from the FY2012–2017 cycle*: Regions should have on record the previous PQR report. These reports are also generally available on EPA's Regional and State NPDES PQR Reports page.[2]

Preparing Action Item Forms

The Region should complete the appropriate sections in the *Action Item Review Forms* (see PQR SOP Attachment D), or use other methods or formats to gather the information requested in the forms.

Action Item Forms 1 and 2 are to be used to gather information on the status of all Essential (formerly "Category 1") Action Items from the FY2012–2017 PQR cycle.

- Use the state PQR report from FY2012–2017 PQR Report cycle to identify all Essential (formerly "Category 1") Action Items.
- Use the Action Item Report from EPA Headquarters to identify which of the Action Items from the FY2012–2017 review cycle have been resolved and which remain unresolved. Note that Action Items identified through older PQR reports, Permitting for Environmental Results (PER), and other processes may be part of the Action Item Report from EPA Headquarters; however, only the ones that were identified in the reports from FY2012–2017 PQR cycle need to be included in this status review.

NOTE: If any Essential Action Items from the PQR Report do not appear in the Action Item Report, this may be because the Action Item was later determined to be a Recommended Item. The Region can verify with the EPA Headquarters Action Item Manager why that item does not appear as an Essential Item in the Action Item Report. In the case of an Essential Action Item later re-categorized as a Recommended Action Item, the item should be placed in the Action Item Form 3 (Recommended) table (following the instructions in the section below) with a footnote to explain the category change.

Fill out the appropriate sections of Form 1 for each Action Item that is identified as unresolved in the Action Item Report. If the Region knows that an Action Item listed as unresolved in the

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Action Item Report has been resolved since the last Action Item Report was provided, you may use Form 2 for that Action Item.

Identify the Recommended Action Items from the FY2012–2017 cycle (formerly designated "Category 2" and "Category 3"). EPA reviewers may also use any other available state or regional information regarding Recommended Action Items. The Region should cross-reference the Essential Action Items in the new Action Item Report with the PQR Report from the FY2012–2017 PQR Cycle to make sure all Essential Action Items from the prior PQR report, and only the items from that cycle, are included in the current review.

Action Item Form 3 is to be used to gather information on the status of all Recommended (formerly "Category 2" or "Category 3") Action Items from the FY2012-2017 PQR cycle.

It is important to note that the Recommended Action Items are addressed at the discretion of the state. The options on the form for status of the Recommended Action Items are intended to reflect that, while EPA believes these Action Items are valuable and would strengthen the state's program, the state is not obligated to address them.

Obtaining Action Item Status Updates

Regions may use the forms in PQR SOP Attachment D or another format of the Region's choice to facilitate information sharing on the status of Action Items. If Action Items forms are being used, once they are populated with the information already available to the Region, the Region should then gather the remaining information from the state. The forms are designed such that the state can complete them and return them to the Region. EPA and the state can also use alternative communications, such as conference calls, if they provide an adequate opportunity for the state to provide all the remaining pieces of information or verify that the information the Region has reflects the current status. EPA should request that the status updates be provided in advance of the state visit portion of the PQR.

Using Action Item Status Update Information

Regions should evaluate the information provided by the state and ask for clarification as necessary. Regions should also refer to the Action Item status information as the PQR permit reviews and state visit are conducted. The PQR report should note congruity or incongruity of the status with the results of the permit reviews and other information from the PQR conducted during FY2018–2022 cycle.

EPA should use the fully completed forms (or equivalent information) to complete PQR Report Sections V and VI using the PQR *Report Template* (see PQR SOP Attachment L). EPA should use information from Forms 1 and 2 to complete Table 1, and use information from Form 3 to complete Table 2.

3.0 Core Permit Reviews

Permit reviews are an essential PQR component and primarily consist of an evaluation of selected permits and supporting materials using standardized NPDES program criteria, with a focus on the Central Tenets of the NPDES Permitting Program (see Appendix 1). This includes assessing core program and permit quality using the process established in this guide, and documenting findings based on the PQR checklist and other tools developed to support this process. The Core Review typically includes a pre-site visit desktop review followed by an onsite review of the permit, fact sheet, and administrative record, including the permit application, limits, monitoring requirements, special conditions, standard conditions, correspondence, documentation, and administrative process, as well as other factors, in the state permit files (see Part IV, section 6.0 for more information on conducting a state visit).

3.1 Permit Selection

For each state PQR, EPA will select and review permits issued by the state (or EPA Region, for states in which EPA is the permitting authority). Selected permits should be representative of permitting practices in the state; care should be shown that permits are not selected because it is known they are exceptional cases (positively or negatively). Permits can be reviewed at the draft stage with a verification review after final issuance or reviewed solely after final issuance; more about permit review procedures can be found in Part IV, section 3.2. The following guidelines apply to permit selection for the Core Review portion of the PQR:

1. **Number of permits for review**: The Region should select a sufficient number of permits for review to yield an adequate representation of permitting practices in the state. There should be a minimum of 10 individual permits reviewed for the Core Review. If a state has multiple regional offices with permit-issuance responsibilities, the Region should use discretion in determining the appropriate number of permits to review to ensure sufficient representation of permitting in the state. It is not necessary to review permits from all regional offices in each PQR cycle, nor is it necessary to review 10 permits from each office unless desired by the Region.

2. **Major and Non-major facility permits**: The majority of permits reviewed should be those for major facilities, with two to three permits reviewed that are for non-major facilities. Therefore, if 10 permits are reviewed, seven or eight of the permits reviewed should be for major facilities.

3. **Permittee types**: The number of POTW and non-POTW permits reviewed should approximately reflect the ratio of major permits issued in that state (e.g., if 60% of major permits issued in the state are POTWs, then review six POTWs and four non-POTWs if the total number of permits selected for review is 10).

4. **Permit Dates**: To capture current permitting practices, the permits reviewed should be in draft form or permits issued within two years of the state visit, when possible. If there is an insufficient number of permits meeting this criterion, permits issued up to four years prior to the review may be used. If draft permit reviews are being utilized for a PQR, the draft permits reviewed should be ones that are expected to be finalized by the time of the planned state visit so that the final version of the permit and full permit

issuance process can be assessed. Regions may also review draft permits that are public noticed in the months leading up to the PQR, provided that the above criteria are met and the Region anticipates final issuance of the permit prior to the PQR state visit.

Identifying the pool of permits to pick from can be done a number of ways. The Regions can use EPA's Integrated Compliance Information System–National Pollutant Discharge Elimination System (ICIS–NPDES) to conduct a search for recently issued permits. If a state provides the Region with their permitting universe in an alternative form, that may be used as well. Review of the same permits for both the Core Review and National Topic Reviews, when possible, is recommended since fewer files must be obtained and reviewed.

3.2 Desktop Review

The desktop permit review is conducted by EPA prior to the state visit to provide preliminary findings. At a minimum, the desktop review is based on the permit and fact sheet; other materials, such as applications, should also be reviewed during the desktop review if available. For the Core Review, the reviewer uses the *NPDES Core Review Checklist* (PQR SOP Attachment E) and completes as much of the checklist as possible. The desktop review is the first phase in populating the checklist; the remainder of the checklist will be completed during the state visit. See Part IV, section 6.2 below, for more information on finishing the checklist during the state visit.

If a draft permit is reviewed, the checklist should be completed to the extent possible based on the draft. The final permit should be reviewed during the state visit, and the permit file should be used to address outstanding checklist questions and issues. Preliminary observations from the desktop review, especially those that are consistent among the permits reviewed, may inform the discussion during the opening interview and guide EPA to ask additional, more focused questions about certain areas of interest (e.g., additional detail regarding reasonable potential procedures). The *NPDES Core Review Checklist Companion* (PQR SOP Attachment F) provides further instruction on using the checklist.

Tools Needed for Review

Reviewers should complete the Core Review by examining selected permits and any supporting documentation, assessing these materials using PQR tools and program knowledge, and, later, talking with state permit writers to answer technical questions related to the permit development process. In the Core Review, reviewers evaluate the permits for all of the "core" elements of the program (e.g., permit administration, effluent limits, monitoring requirements, standard conditions, and special conditions).

The following tools are primarily used for the Core Review:

- Central Tenets of the National Pollutant Discharge Elimination System (NPDES) Permitting Program (see Appendix 1);
- *NPDES Core Review Checklist* (see PQR SOP Attachment E); and
- *NPDES Core Review Checklist Companion* (see PQR SOP Attachment F)

State Permitting Regulations and Policies

As an initial step, reviewers should locate the permitting regulations, water quality standards (WQS), and implementation policies and guidance for the state being reviewed. It is critical to have an understanding of the state's NPDES program and WQS prior to evaluating permit quality. The regulations, WQS, and policies and guidance, specifically with attention to procedures and methodologies for assessing reasonable potential, may include useful information such as implementation procedures for water quality criteria and effluent limit development or special technology treatment standards, which would enable an efficient review of the state's permit.

The state's WQS typically identify the receiving water classification, designated uses and mixing zone guidelines; this information is required to complete the questions contained in the Water Quality-based Effluent Limits section of the checklist. In addition, reviewers should also locate the state's list of impaired waters and TMDLs, if available, as the checklist contains questions regarding the permit's content with respect to the facility's receiving water impairment status and applicability of TMDLs to the receiving water.

Using the Checklist

The goal of the NPDES Core Review Checklist is to provide a common structure to assess and document whether the permit and administrative record provide a complete, comprehensive, and transparent record of permit development. The checklist is intended to guide a comprehensive evaluation of the NPDES permit development process by the PQR team, a group of knowledgeable NPDES permit reviewers. During the desktop permit review, reviewers will complete as much of the NPDES Core Review Checklist as possible based on the information available. This portion of the review is most commonly conducted prior to any in-person visit to the state.

Reviewers will complete the checklist by answering "yes," "no," or "uncertain" (or "NA") to the questions in each section. A "yes" or "no" response in the checklist does not necessarily mean that the condition is correct or incorrect. Rather, the checklist is intended as a guide for the permit reviewer to help ensure a thorough review of the permit. Reviewers are encouraged to include additional comments as end notes to support the answers noted in the checklist. This is helpful during a desktop review to document potential issues, questions, or information that is needed, as well as to indicate which documents the response is based upon.

Reviewers should refer to EPA's *NPDES Core Review Checklist Companion* (PQR SOP Attachment F) for assistance in completing the checklist. Frequently, the desktop reviewer does not have access to anything more than the permit and fact sheet. Reviewers will complete each question of the checklist and add comments as necessary to provide information to guide the on-site staff to review specific components of the permit file, application, or administrative record. These comments will aid the reviewer in identifying specific questions to ask the state's permit writer in order to evaluate the checklist question more fully while on-site. Reviewers may find it useful to include the location within the permit or fact sheet where the evidence supporting the

answer was found. This also may enable the state visit reviewer to examine permit documents more efficiently.

Summarizing Findings

Reviewers should summarize main findings for each permit and supporting materials reviewed. The final page of the checklist provides space to note this information under the "Notes for onsite reviewer" and "Issues identified" headings. This summary enables staff who may not have reviewed the permit to have an "at a glance" understanding of the permit terms and conditions and highlight potential topics for further discussion when on-site. Note that the person that conducts the desktop review may not be the same person that conducts the state visit, so providing as much detail as possible in the checklist is encouraged. Preliminary findings, specifically those that are consistent among the permits reviewed, may inform the discussion during the opening interview and guide EPA to ask additional, more focused questions about certain areas of interest. Therefore, a reviewer should summarize overall observations such as potential issues (e.g., omission of effluent limits implementing secondary treatment standards or ELGs), unclear permit conditions or rationale, or of the use of a unique permitting approach, so that staff conducting the state visit review are able to ask focused questions of the state permit writer.

Completing the Core Review

Completion of the core review is accomplished with a file review at the state visit. See Part IV, section 6.0 for more information on conducting a PQR state visit.

4.0 National Topic Reviews

National Topic Reviews target specific components of permits or types of permits and are conducted to evaluate specific issues or types of permits of national priority. The scope of a National Topic Review is determined by checklists developed by EPA. National topic areas are topics of national significance that affect every state in every Region; as a result, each state PQR must evaluate all national topic areas. These areas—permit controls for nutrients in non-TMDL waters, effectiveness of POTW NPDES permits with food processor contributions, and small municipal separate storm sewer system (MS4) permit requirements—are reviewed using topic-specific checklists to ensure that permits and permitting programs are properly addressing NPDES requirements.

National Topic Reviews, which are typically solely desktop reviews conducted at EPA offices, each have standard assessment criteria and procedures for reviews. Permits reviewed for the national topic area reviews should be reasonably representative of state practice at the time the PQR is conducted. These permits may be the same permits reviewed for other portions of the PQR, if such permits meet the criteria for selection for both portions of the review (e.g., a permit could be utilized for the Core Review and the nutrients topic area review if it incorporates nutrient limits).

Each national topic is discussed below. National topic assessment packets, which include more detailed information on the procedures for conducting the review for that area, can be found as PQR SOP Attachments G, H, and I.

4.1 Permit Controls for Nutrients in Non-TMDL waters

The goal of this review is to evaluate permit controls for nutrients in waters impaired by or vulnerable to nutrient pollution, but without an active TMDL.

PQR SOP Attachment G contains more detailed instructions, permit selection criteria, programmatic questions, and permit review questions that should be used to assess permitting for nutrients dischargers.

4.2 Effectiveness of POTW NPDES Permits with Food Processor Contributions

The goal of this pretreatment program area review is to evaluate effectiveness of POTW permits with food processor contributions.

EPA, states, and POTWs play a variety of roles when implementing the Pretreatment Program. EPA Regions should complete this topic review for those programs where the state is the pretreatment authority, and EPA Headquarters will review this topic for those programs where EPA is the pretreatment authority. For those states where the state is the NPDES permitting authority but EPA implements the pretreatment program, the Region should coordinate with EPA Headquarters to ensure the PQR report contains EPA Headquarters' review of this pretreatment topic when it is drafted.

PQR SOP Attachment H contains detailed review instructions, programmatic questions, and permit review questions that should be used to assess permitting effectiveness of POTW permits with food processor contributions.

4.3 Small Municipal Separate Storm Sewer (MS4) Permit Requirements

The goal of this review is to assess how the NPDES program stormwater discharges are permitted from certain MS4s.

PQR SOP Attachment I contains the detailed instructions, specific programmatic questions, and permit review questions that should be used to assess permitting for small MS4s.

5.0 Regional Topic Reviews

Regional Topic Area Reviews evaluate issues of regional or state importance and are determined by EPA Regions on a case-by-case basis. These Regional Topic Areas may be unique to each state PQR and there is no standard list from which to select focus areas. If a region elects to include regional topic areas in a PQR, the Region should consider challenges the state program is facing, and also consider other factors, such as:

- If there are significant levels of activity in the state or Region;

- Whether new regulatory requirements exist;

- Weak state requirements or weak program implementation; or,

- If activities within the state or Region pose a potential for significant environmental impact.

Based on these factors, Regions may opt to choose one or more regional topics to conduct select permit reviews to assess state implementation of these programs against NPDES regulations. There are no standardized assessment criteria (i.e., checklists) for these reviews and thus applicable NPDES requirements and guidance should be used. Regions will be expected to summarize findings of the reviews in the final state PQR report.

5.1 Selecting Permits for Regional Topic Area Reviews

Though additional documents and state policies or procedures may be reviewed as part of the Regional Topic Area Reviews, permit reviews should be included in the assessment of each area. The Region should review a sufficient number of permits to yield an adequate representation of permitting practices. Permits issued within the last two years should be reviewed, when possible.

6.0 Conducting a PQR State Visit

The purpose of the state visit is to discuss the state NPDES program with relevant state staff to better understand how the state is implementing various aspects of program requirements, to complete the Core Review, and to discuss preliminary findings. While a great deal of information can be gleaned from conducting desktop reviews, information from state staff and in the permit's administrative record contained within the state permitting office allows the reviewer to more fully understand the decision-making process involved in permit development across the state. It also allows for improved relations with the state through face-to-face discussions of strengths and challenges within a state program. Where a state has regional offices with substantial permitting responsibilities, the Region should consider visiting multiple offices as part of the PQR. Typically, there are at least two reviewers present at the state visit to conduct permit reviews.

A *State Visit Packet* (see PQR SOP Attachment K) has been compiled as an aid for reviewers who are traveling to a state office as part of the PQR. This Packet contains the interview questions as well as tips for conducting the opening interview, performing file reviews, and preparing for and conducting the close-out interview.

In preparation for the state visit, the PQR lead in the Region should:

- Request sufficient review space be provided for use for the interview and permit review portions of the visit.

- Request that the files for the permits selected for review be made available to the reviewers.

- Provide the state with the schedule and/or agenda for the visit and any requests for availability to meet with permitting staff and management during the visit.
    - Consider the amount of time that should be allotted to the opening interview (e.g., two hours) and exit interview (e.g., one hour) and inform the state so appropriate personnel can plan their availability. It is important to adhere to the planned time allocation so state staff are present to provide information as needed in these meetings.
- Provide the *PQR Advance Questionnaire* (see PQR SOP Attachment C) to the state well in advance of the review, in order to receive the state's response prior to the visit.

6.1 PQR Opening Interview

The PQR state visit generally begins with a discussion with state permitting staff and management. Typically, two or three senior permit writers and permitting management are present; TMDL and water quality modeling staff are sometimes present as well. It is important to include state permit writing staff in the interview and not restrict the interview to management-level participation. The purpose of the opening interview is to discuss information provided by the state regarding background permit program information and to walk through the permit development process in the state.

The *PQR Advance Questionnaire* (see PQR SOP Attachment C) should be sent to the state prior to the state visit to gain a better understanding of the permitting universe and state NDPES program structure, and reduce the time needed for the interview while visiting the state. The Region should request that the completed document be submitted to the Region no less than two weeks prior to the state visit so it can be reviewed to verify the document is accurate and determine if any follow-up questions are needed at the state visit.

Staff should reference EPA's *PQR Opening Interview Questions* (see PQR SOP Attachment J) to conduct interviews with the state. For Region-led reviews, the Region representative will lead the interview portion of the review. The opening interview should begin with an explanation of the review process before moving into the programmatic questions, including a timeline for report development, and what role the state is expected to play in the state visit and report review. These questions address permit program background information and NPDES permit development. In addition, the questions follow a general progression, covering topics as broad as the permitting universe and as narrow as the requirements for sufficiently sensitive analytical methods for certain parameters. Even though EPA staff may have an existing understanding of state processes and procedures, it is important that the interview questions are used during the site visit to ensure that EPA understands the most current practices in the state prior to reviewing permit files.

Once the interview is complete, Regional staff participating in the PQR should have a better understanding of the state's permit development process, as well as any external challenges the state may face in implementing their NPDES program.

6.1.1 Tips for conducting the opening interview

EPA's list of questions provides a general guide, but the interviewer should acknowledge the interview will address tangential topics not listed explicitly in the interview questions, based on answers given to the questions presented in the list.

While many Regional staff are very familiar with state programs, it is important to closely follow the *PQR Opening Interview Questions* (see PQR SOP Attachment J) to the greatest extent possible. Many assumptions are often made about various aspects of the permit development process; however, asking the state to walk through their process can only help the interviewer gain an even better understanding of current practices in the program.

To gain a clearer understanding of the health of the state's NPDES program, detailed and focused questions should be asked as necessary, based on the flow and direction of the interview. Because each permitting program has unique issues, the interviewer may ask questions more specific than those included in EPA's PQR Opening Interview Questions (see PQR SOP Attachment J). EPA personnel conducting the interview at the state visit should take careful notes for use in preparation of the PQR report.

6.2 Review permit files

Prior to the state visit, Regions should provide states with a list of the Core Review permits EPA examined for the desktop review. The state should make available for review the permit file, which typically includes the final permit, fact sheet, administrative record, calculations, and appropriate supporting information (e.g., application, facility monitoring data, effluent limit calculations).

While at the state, Regions should conduct a complete review of the permit, fact sheet, and supporting information in order to complete the *NPDES Core Review Checklist* (see PQR SOP Attachment E). Generally, the state visit reviewers will use the partially-completed NPDES Core Review Checklist from the desktop review and complete the remaining portions of the checklist while reviewing the final permit and supporting documentation. If a draft permit was reviewed during the desktop review, the reviewer should note any changes between the draft and final permit and ensure the checklist responses reflect the final permit. Reviewers should also follow-up on comments and preliminary findings provided for each permit being reviewed. State visit reviewers will likely have opportunities to talk with the permit writer to ask specific questions during the permit review; reviewers should use this opportunity to clarify comments included in the PQR checklist to identify state-specific approaches to developing certain permit conditions and rationale.

6.2.1 Tips for conducting a file review

Remember that you likely have a maximum of 2–3 hours to complete the permit file review for all selected permits, including documenting any information found in the files. Budget your time appropriately and try not to get delayed by too many details.

As you review the file, periodically scan through the permit review checklist to reinforce what questions and issues are unclear, and which elements to focus on during the review. Prior to starting the file review, make sure to clarify with state staff where all relevant information is located. This should generally be covered during the interview process. Specifically, make sure to determine the following:

- What data and information are in hard copy and what data and information are electronic?
- How are files organized? (e.g., permit, correspondence, administrative record)
- Have they provided *the full permitting record*?

Once you've gathered the complete file, spend 5–10 minutes to quickly leaf through it front to back and see what is available. Get the big picture first by identifying:

- Previous permit and fact sheet;
- Most recent permit application;
- Current permit and fact sheet;
- Reasonable Potential (RP) and limit calculations (if not in fact sheet); and
- Administrative record information (e.g., public notice, response to comments).

If anything is absent, make a note and follow up with state staff. Ask early in the review process to allow sufficient time for state staff to respond. Take care not to assume information is lacking, only to find out too late that it's in a different file. After identifying the key components of the record, try to follow the chronology of the permit application and development. Remember to consider the information provided during the interview regarding the state's permit development process to see if the files indicate consistent implementation of state procedures. The permit review checklists should lead you through this process.

- Review the permit application to confirm it was submitted on time and contained all required data and information. Note any correspondence that may have affected the application process.
- Review the fact sheet to see if it describes the permit development process.
- Review any comments and response to comments to see how these may have influenced the permitting decisions.
- Review the final permit to ensure that it is consistent with the fact sheet and response to comments.
- Check the administrative elements to ensure that the permit was properly public noticed and that all comments were appropriately addressed.

Depending on where and how the RP and limit calculations are located (e.g., in the fact sheet, supplemental spreadsheets, WQ memos or reports), try to work through the logic of the limit calculation process. The fundamental question to answer is: "Can I recreate the limits in the final permit based on the information provided in the record?" The permit review checklists

should lead you through this process. Again, also consider the process as described by the state during the interview. Some specific things to assess include:

- How did the state decide what pollutants to evaluate?
- Does the record explain how TBELs were developed (e.g., federal secondary treatment standards, ELG applicability, production data used, BPJ applicability)?
- What data was used for the RP calculations?
- How were ambient/background data incorporated?
- What dilution/mixing assumptions were used?
- Do the calculations or spreadsheets follow accepted EPA or state WQS implementation procedures?
- Are final limits established for all pollutants where RP was identified?
- Are final limits consistent with values calculated in the supporting documents?
- Is the state's process transparent and reproducible?

Throughout the review process, use the permit review checklist to make notes and flag issues or concerns identified during the review. Also note where the state has done a particularly good job addressing a particular issue.

6.3 Compile preliminary findings and develop conclusions

Reviewers should take some time to summarize their findings and provide input to develop conclusions and proposed action items. For each permit reviewed, note the highlights and deficiencies. Once all permits have been reviewed, Regions should take time to review notes from all permit reviews; trends may be seen across the permits reviewed and these trends are generally the findings of the PQR. Reviewers should also generate questions for additional clarification during the close-out interview.

6.4 Conduct close-out interview

Upon completing the file reviews and discussion with supporting reviewers, Regions should reconvene with state staff to discuss preliminary findings from the permit review, generated from both the desktop review and state visit review. The close-out interview presents both observed strengths of the NPDES program as well as areas requiring improvement. It is a discussion; therefore, the state should be offered opportunities to respond to EPA's findings and clarify, if necessary. During the close-out interview, EPA also presents the timeline for next steps.

In preparing for the close-out interview, it is helpful to follow the format of the final report in presenting information:

A. Basic Facility Information and Permit Application
B. Developing Effluent Limitations

(TBELs, RP and WQBELs, Final Effluent Limitations)

C. Monitoring and Reporting

D. Standard and Special Conditions

E. Administrative Process

F. Administrative Record and Fact Sheet

For each of these areas, summarizing program strengths and critical findings is helpful in organizing review findings for the final report. Additional tips on preparing for and conducting the close-out interview can be found in the *State Visit Packet* (see PQR SOP Attachment K).

6.4.1 Tips for conducting the exit interview

When conducting the exit interview, the following provides a good outline to follow to ensure you touch upon the major findings of the permit reviews, and relay critical information about the review process to the state. The *State Visit Packet* (see PQR SOP Attachment K) can help those leading the reviews while in the state offices.

- Thank the state for taking the time to meet with the PQR team and for providing all of the files and information. Tailor as necessary to the support provided.

- Discuss the timing of the written PQR report, and when and how the findings will be transmitted to the state.

- Discuss whether and how the state will be provided the opportunity to review and provide comments on the draft PQR report.

- Provide the "high level" findings to the state representatives
  - Caveat the discussion by indicating that the findings presented during the exit interview are "preliminary" and that the final written report may differ based upon subsequent review of the detailed notes and file reviews.
  - The level of detail provided in the exit interview may vary widely depending on the nature and sensitivity of the findings. For example, if there are issues where the PQR team determines that Regional or Headquarters management should be consulted prior to issuing a finding, then these issues would generally not be discussed in detail during the exit interview.
  - Findings should be general in nature, but the PQR lead and team members may wish to provide examples observed during file reviews or staff interviews.
  - Findings should be presented by first highlighting positive aspects of the state's program (e.g., robust technical analyses, high quality permits or fact sheets, good documentation, well organized files, dedicated staff, QA/QC processes, training, electronic tools and templates, etc.)
  - Relate the significant deficiencies noted during the PQR, providing as much detail as the team determines appropriate. During this process, try to be constructive and perhaps chart a preliminary path forward to resolve issues acknowledged by the state representatives.

- At the conclusion of the discussion of findings, ask the state representatives if they have any additional questions or comments.
    - Provide contact information so that the state can follow up if they think of additional questions.
    - Confirm the process and schedule to obtain any additional information or records that the PQR team and state identify during the discussion.
- Thank everyone again for their time and effort in supporting the PQR.

7.0 Report Development

Once permit reviews and state visits are complete, the PQR team lead will be responsible for drafting a report summarizing findings and recommendations from the Core Review, as well as compiling National and Regional Topic Area Reviews from the PQR team. The report will include draft recommendations, referred to in the report as Action Items, for improving the quality of permits within specific states or permitting authorities. Action Items are divided into two categories to identify the priority that should be placed on each Item and facilitate discussions between regions and states.

- **Essential Actions -** Proposed "essential" action items address noncompliance with respect to a federal regulation. The permitting authority is expected to address these action items in order to come into compliance with federal regulations.

- **Recommended Actions -** Proposed "recommended" action items are recommendations to increase the effectiveness of the state's or Region's NPDES permit program. The report should be developed based on the Report Template (see PQR SOP Attachment L).

The goal of the report is to summarize and facilitate publishing PQR findings on EPA's website at https://www.epa.gov/npdes/npdes-program-management-and-oversight#pqr

7.1 Finalizing the Report

Once the report has been written and reviewed for grammar and consistency, a draft report should be submitted to EPA Headquarters for review. EPA Headquarters will review reports completed for all states to ensure national consistency in categorization of issues across all states and territories. If the comments from EPA Headquarters are lengthy or substantial, the EPA Headquarters PQR leads may request the opportunity for a quick second review before report finalization. The Region should make any necessary edits to address comments from EPA Headquarters before providing the draft report to the state. The state will review the report for accuracy and provide comments or clarification if needed. After the state's review and any resulting revisions made by the Region, the draft final report will be submitted to EPA Headquarters for a second review if one has been requested, then sent to back to the Region for finalization.

To finalize the report, ensure that all comments have been considered, all issues are adequately summarized, and that it complies with the *EPA Communications Stylebook.*[3] At this point, the Region should compile all appropriate appendices, and save the report and all attachments as a single .pdf file. This file should then be shared with EPA Headquarters and the state permitting office. EPA Headquarters will the results of PQRs on the PQR website.
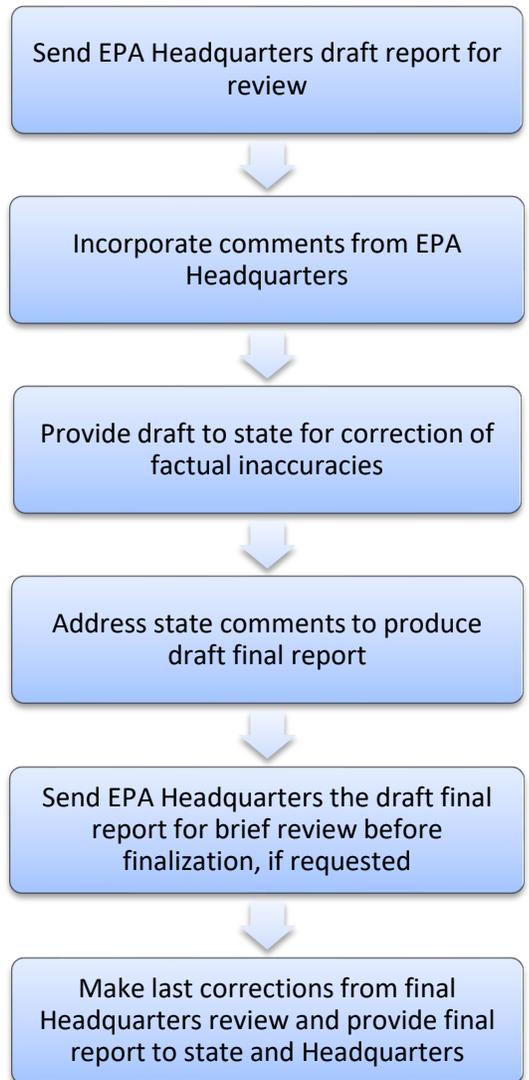
Important! Keep in mind that the findings report summarizes findings at the time of the review. If the state has taken corrective action on any issues, make a note of it in the report but do not remove it from the report. It was an observed finding at the time of the review, and the report should reflect that.

Figure 1. PQR Report Finalization Process

Send EPA Headquarters draft report for review

Incorporate comments from EPA Headquarters

Provide draft to state for correction of factual inaccuracies

Address state comments to produce draft final report

Send EPA Headquarters the draft final report for brief review before finalization, if requested

Make last corrections from final Headquarters review and provide final report to state and Headquarters

7.2 Action Item Tracking

The NPDES Action Item database is a tool used by EPA to track program deficiencies and their resolution. Since 2006, Action Items have come mainly from findings specified in PQR reports. PQRs identify two categories of Action Items:

- Essential action items address noncompliance with regulations; and

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[3] Available at: http://www.epa.gov/stylebook/

- Recommended action items address deficiencies with EPA guidance/policy or are recommendations to increase program effectiveness.

Essential action items will be tracked through EPA's Action Item database. Action items are added to the database after discussion with the Regions, which not only specify the area for improvement but also address the necessary milestones required to complete the action item and due dates for completion. Action items are reviewed and updated by EPA Headquarters twice a year and serve as a key link between the PQRs and continual improvement of the NPDES program.

Appendix 1: Central Tenets of the National Pollutant Discharge Elimination System (NPDES) Permitting Program

I. Permit Administration	
CWA/NPDES Requirements	**Conditions Subject to Disapproval**
The Clean Water Act (CWA) and NPDES regulations require that no point source may discharge pollutants to Waters of United States without explicit authorization provided by an NPDES permit. Complete applications must be submitted at least 180 days prior to discharge or expiration. Additionally, NPDES permit terms may not exceed 5 years. NPDES permits must clearly state the permit term and may not be modified to extend the permit term beyond 5 years. The NPDES regulations also require "fact sheets" for all major facilities, general permits, and other permits that may be subject to widespread public interest or raise major issues. Fact sheets MUST contain all of the elements prescribed at 40CFR124.8 AND 40CFR124.56.	– Any facility that fails to submit a complete permit application at least 180 days prior to discharge or expiration – Any permit that does not clearly identify the permitted facility and describe the authorized discharge location(s) – Any permit with term > 5 years – Any permit modification that extends the permit term beyond 5 years – Any permit (for a major facility, general permit, et al.) that is not accompanied by a fact sheet developed in accordance with the requirements of 40CFR124.8 and 40CFR124.56.

II. Technology-Based Effluent Limits	

Municipal Dischargers - Publicly Owned Treatment Works (POTWs)	

CWA/NPDES Requirements	Conditions Subject to Disapproval
CWA requires POTWs to meet secondary or equivalent to secondary standards (including limits for BOD, TSS, pH, and percent removal). Permits issued to POTWs, therefore, MUST contain limits for ALL of these parameters (or authorized alternatives) in accordance with the Secondary Treatment Regulations at 40 CFR Part 133.	– Any permit that does not contain specific numerical limits for BOD (or authorized alternative; e.g., CBOD), TSS, pH, and percent removal. – Any permit that contains limits less stringent than those prescribed by the Secondary Treatment Regulation at 40 CFR Part 133, unless authorized by the exceptions noted in this regulation. – Any permit that applies these exceptions must clearly document the basis. – Any permit that contains a compliance schedule that extends a statutory deadline for meeting secondary treatment requirements.

Non-Municipal Dischargers	

CWA/NPDES Requirements	Conditions Subject to Disapproval
The CWA requires permits issued to non-municipal dischargers to require compliance with a level of treatment performance equivalent to "Best Available Technology Economically Achievable (BAT)" or "Best Conventional Pollutant Control Technology (BCT) by July 1, 1989, for existing sources, and consistent with "New Source Performance Standards (NSPS)" for new sources. Where effluent limitations guidelines (ELG) have been developed for a category of dischargers, the technology-based effluent limits MUST be based on the application of these guidelines. In addition, if pollutants are discharged at treatable levels and ELGs are not available, or for pollutants that were not considered during the development of an applicable ELG, the permit must include requirements at least as stringent as BAT/BCT. The performance level equivalent to BAT/BCT MUST be developed on a case-by-case basis using the permit writer's best professional judgment in accordance with the criteria outlined at 40CFR125.3 (d).	– Any permit that does not include a specific numerical limit (or other requirement) for any pollutant parameter that is part of an ELG applicable to a discharger. – Any permit that misapplies or miscalculates an applicable limit required by an ELG (*e.g., improper categorization, improper new source/existing source determination, inappropriate production or flow data used to calculate limits, failure to adjust limits to account for unregulated waste streams such as non-contact cooling water or storm water*). – Any permit that does not contain a limit at least as stringent as required by 40CFR125.3(c)(2) where effluent limitations guidelines are inapplicable (*e.g., where a pollutant is discharged at treatable levels, but there is no applicable ELG, or the applicable ELG did not consider the pollutant of concern*). – Any permit that contains a compliance schedule that extends a statutory deadline for meeting a technology-based effluent limit.

III. Water Quality-Based Effluent Limits	
CWA/NPDES Requirements	**Conditions Subject to Disapproval**
CWA requires every State to develop water quality standards to protect receiving water, including designated uses, water quality criteria, and an anti-degradation policy. The NPDES regulations at 40 CFR 122.44(d) require that limits MUST be included in permits where pollutants will cause, have reasonable potential to cause, or contribute to an exceedance of the State's water quality standards. States will likely have unique implementation policies for determining the need for and calculating water quality-based effluent limits; however, there are certain tenets that may not be waived by these State procedures. These include: – Where valid, reliable, and representative effluent data or in-stream background data are available they MUST be used in applicable reasonable potential and limits derivation calculations. Data may not be arbitrarily discarded or ignored. – Where calculations indicate reasonable potential, a specific numeric limit MUST be included in the permit. Additional "studies" or data collection efforts may not be substituted for enforceable permit limits where "reasonable potential" has been determined. – Where the preponderance of evidence clearly indicates the potential to cause or contribute to an exceedance of State water quality standards (even though data may be sparse or absent), a limit MUST be included in the permit (e.g., a new POTW plans to chlorinate its effluent and in-stream chlorine toxicity is anticipated). – Where a technology-based is limit is required (due to an ELG or BPJ) AND the limit is not protective of water quality standards, a WQBEL MUST be developed and included in the permit regardless of whether data indicate reasonable potential (i.e., a technology-based limit cannot authorize a discharge that would result in a violation of water quality standards). – Where the permit authorizes the discharge of a pollutant that results in a new or increased load to the receiving water, the State must ensure that the new or increased load complies with the anti-degradation provisions of the State's water quality standards. – The final calculated limit placed in the permit MUST be protective of water quality standards, and MAY NOT be adjusted to account for "treatability" or analytical method detection levels.	– Any permit where the State fails to use all valid, reliable, and representative effluent or in-stream background data in reasonable potential and limits calculations. – Any permit where the State fails to include a final enforceable limit in a permit where the discharge of a pollutant will cause, have reasonable potential to cause, or contribute to an exceedance of a State water quality standard. – Any permit that fails to incorporate WLAs from an approved TMDL, or that contains a limit that is not consistent with the WLA prescribed in an approved TMDL – Any permit that contains technology-based limits that are not protective of water quality standards – Any permit that modifies a properly developed WQBEL to account for the ability of treatment to achieve the WQBEL or the availability of an analytical procedure to measure the presence of the pollutant – Any permit that authorizes new or increased loading of a pollutant that is not in compliance with the State's anti-degradation policy – Any permit that contains a limit less stringent than a limit in the previous permit, unless specifically authorized under the anti-backsliding provisions of the CWA – Any permit that allows a variance of a State water quality standard, unless the variance has been approved by the EPA Region. – Any permit that allows a new or increased loading of a pollutant to a receiving water that has not been evaluated for and shown to be in compliance with the anti-degradation provisions of the State's water quality standards regulations. – Any permit that includes a compliance schedule for meeting a WQBEL, unless the State standards specifically allow for compliance schedules and the standard was established or modified after July 1, 1977.

IV. Monitoring and Reporting Conditions	
CWA/NPDES Requirements	**Conditions Subject to Disapproval**
The CWA and NPDES regulations require permitted facilities to monitor the quality of their discharge and report data to the permitting authority. Each State will have unique policies and procedures to establish appropriate frequencies, procedures, and locations for monitoring; however, there are certain tenets that may not be waived by these procedures.	– Any permit that does not require at least annual monitoring for all pollutants limited in the NPDES permit, unless the permittee has applied for and been granted a specific monitoring waiver by the permitting authority, and this specific waiver is included as a condition of the permit. – Any permit that does not require monitoring to be performed at the location where limits are calculated and applied (i.e., the monitoring location cannot be at a location that includes flows that were not accounted for in limits development; e.g., cooling water, storm water). – Any permit that does not require that the results of all monitoring of permitted discharges conducted using approved methods, be submitted to the permitting authority.

V. Special Conditions	
Municipal Dischargers - Publicly Owned Treatment Works (POTWs)	
CWA/NPDES Requirements	**Conditions Subject to Disapproval**

In general, special conditions will be established based on the unique characteristics of the permitted facility. The appropriateness of these conditions, therefore, must be assessed on a case-by-case basis. However, there are certain elements of special conditions that may be the basis of an objection.	– Pretreatment: Any permit for a POTW required to implement a pretreatment program that does not contain specific pretreatment conditions. [State/Regional-specific language]
	
	– Municipal Sewage Sludge/Biosolids: Any permit that does not contain conditions addressing the facility's use/disposal of biosolids consistent with Federal requirements. [State/Regional-specific language]
	
	– Combined Sewer Overflows (CSO): Any permit for a facility authorized to discharge from CSOs, that does not comply with the State's CSO control policy and, at a minimum contain requirements for:
	  o Requiring compliance with all of the "Nine Minimum Controls"
	  o Requiring development and implementation of a "Long Term Control Plan"
	
	– Sanitary Sewer Overflows (SSO): Any permit that authorizes the discharge of untreated effluent from SSOs under any circumstances.

Municipal and Non-Municipal Dischargers	
CWA/NPDES Requirements	**Conditions Subject to Disapproval**
In general, special conditions will be established based on the unique characteristics of the permitted facility. The appropriateness of these conditions, therefore, must be assessed on a case-by-case basis. However, there are certain elements of special conditions that may be the basis of an objection.	– Any permit that contains a compliance schedule that extends a CWA deadline or otherwise modifies or postpones CWA or NPDES requirements unless specifically provided for in the statute or regulations. – Any permit that uses special studies or management plans to replace or modify limits or conditions that are required by the CWA or NPDES regulations, unless specifically provided for in the CWA or NPDES regulations (*e.g., permit requires a monitoring program in lieu of establishing a permit limit where available data indicate reasonable potential*).

VI. Standard Conditions	
CWA/NPDES Requirements	**Conditions Subject to Disapproval**
The NPDES regulations at 40 CFR 122.41 and 122.42 require that certain "standard conditions" be placed in all NPDES permits. The regulations allow States to omit or modify these standard conditions ONLY where the omission or modification results in more stringent requirements. For example, the standard condition that allows "bypass" under certain circumstances or the standard condition that allows "upset" to be used as an affirmative defense, may be omitted because the result of the omission is a more stringent permit requirement.	– Any permit that does not contain ALL of the standard conditions of 40 CFR 122.41 (unless the omission results in a more stringent condition). – Any permit that modifies the language of the standard conditions (unless the modification results in language that is more stringent than the 122.41 requirement). – Any permit for an existing non-municipal discharger that does not include the notification requirement of 40 CFR 122.42(a) – Any permit for a POTW that does not include the notification requirement of 40 CFR 122.42(b) – Any permit for a Municipal Separate Storm Sewer System (MS4) that does not include the annual reporting requirement of 40 CFR 122.42(c)

2018 State Permit Quality Review

NPDES No.	Permit Name	Reviewer	Draft, Modification, or Final Permit?	Core Review				National Topics			Regional Topic
				POTW	Non-POTW	Major	Minor	Nutrients in Non-TMDL	Pre-Rx Food Processors	Small MS4s	Shale Gas
ZZ4521451	ABCD WWTP		F	X		X		X	X		
ZZ3214562	Your Town WPCP		F	X		X		X	X		X
ZZ1021054	Easyville WPCP		F	X		X		X	X		
ZZ6217814	Big Power LLC		F		X	X					X
ZZ6541238	Major Generating Stat.		F		X	X					
ZZ9244781	Super Gen. Stat.		F								
ZZ7136545	Big City WPCP		M	X		X		X			
ZZ1288464	That Municipal		M	X		X		X			
ZZ6119451	Main WWTP		F	X			X				
ZZ6549321	Great STP		M	X		X			X		
ZZ1478523	A Gypsum Co.		F		X	X		X			
ZZ9874611	National Brand Foods		F		X		X	X			
General Permits											
GP-xxxxxx	Hydrofracking GP		D								X
GP-0-15-002	MS4 GP 2016		F							X	
GP-0-10-002	MS4 GP 2011		F							X	
Total Permits Identified				7	4	9	2	7	4	2	1
Total Permits Required for PQR				% of major universe in state		7-8	2-3	4	4	2	NA