

February 28, 2020

Data Quality Record for Long-Term Performance Goal

Long-Term Performance Goal Text: By September 30, 2022, reach all permitting-related decisions within six months.

Goal Number/Objective: Goal 3: Greater Certainty, Compliance, and Effectiveness/Objective 3.4: Streamline and Modernize

NPM Lead: Office of the Administrator (AO)

This long-term performance goal applies to new permit application and existing permits that are awaiting renewal. The sum of backlogged new applications and existing permits will be calculated separately.

New Permits: This measure tracks the sum of applications that have been pending for over six months past the date of receipt of an initial application (for NPDES, UIC, RCRA Subtitle C, and approvals to decontaminate, store, or dispose of Polychlorinated Biphenyls [PCBs] under TSCA); NSR permits that have been pending for longer than 12 months past the date of receipt of complete application; and Title V permits that have been pending for longer than 18 months past the date of receipt of complete application.¹

For NSR and Title V, the time for a permitting-related decision is calculated from the date of receipt of a complete application to the date of a permit decision. For all other permit types, the time for a permit-related decision is calculated from the date of receipt of an initial application to the date of permit decision.

The baseline for this measure is 186 new permit applications in backlog as of June 30, 2018. This measure tracks progress toward a FY 2020-2021 Agency Priority Goal (APG).

Existing Permits: This measure tracks the sum of existing permits that have passed their expiration date and are awaiting reissuance. This measure applies to NPDES, UIC, RCRA Subtitle C, Title V permits, and approvals to decontaminate, store or dispose of PCBs. NSR permits are excluded because they cannot be renewed. The time for a permitting-related decision is calculated from the date on which an existing permit passes its expiration date for all permits except for Title V. For Title V permits, the time for a permitting-related decision is calculated from the date of receipt of a complete application to renew the date of a permit decision.

The baseline for this measure is 417 existing permits in backlog as of September 30, 2019. This measure tracks progress toward a FY 2020-2021 APG.

1a. Purpose of Long-Term Performance Goal: This measure will inform on EPA's commitment to provide consistency and certainty to the regulated community in executing its responsibilities. EPA's goal is to

¹ The permit issuance goal for Title V permits (new and requests to renew) is 18 months from the receipt of a complete application, as per the statute [(40 CFR Part 70.7(a)(2)]. The permit issuance goal for NSR permits is one year from the receipt of a complete application, as per the Presidential Memorandum of April 12, 2018: <https://www.whitehouse.gov/presidential-actions/presidential-memorandum-administrator-environmental-protection-agency/>.

complete agency permitting decisions within a six-month timeframe for all permits except for NSR and Title V; for those permits, the goal is to make permitting decisions within the timeframe allowed under the statute (Title V) or by Presidential Order (NSR). A positive trend, defined as a decrease in the number of pending applications for new permits that exceed the timeframes described above, while maintaining or improving application review quality, will provide more certainty to all permit applicants.

1b. Performance Measure Term Definitions: For a complete list of permits, see the addendum. All permits are authorized under the Clean Air Act, Clean Water Act, Safe Drinking Water Act, or Resource Conservation and Recovery Act; approval to dispose of, decontaminate, or store PCBs are authorized under TSCA.

For the purposes of this performance measure, **permitting-related decisions** are based on applications for new, individual permits or requests to renew existing permits.

For all permit types listed in the Addendum except for NSR and Title V, **permitting-related decisions** are measured from the date on which the application is received by a regional permitting office to the date on which the permit is issued or is denied.

For NSR and Title V permits, **permitting-related decisions** are measured from the date on which a complete application is received by a regional permitting office to the date on which the permit is issued or is denied.

A **pending permitting-related decision** is a decision to approve or disapprove a permit application that has not yet been made.

1c. Unit of Measure: Number of permits

2a. Data Sources:

- Relevant information system(s):
 - a. EPA Permit Tracker
- Entity that reports data to the system(s) (state, tribe, etc.):
 - a. EPA Regions
- Frequency of reporting primary data:
 - a. Primary data will be collected monthly; results will be reported on annually in EPA's Annual Performance Report. Results will also be reported in EPA's APG Action Plan quarterly reports.
- Quality Assurance Project Plan or QA Action Plan data is collected under:
 - a. Headquarters shares a monthly report with EPA Regions for Regions to verify data accuracy.

2b. Data needed for interpretation of (calculated) Performance Result:

- See addendum for a list of permit types, under which permitting data will be collected and analyzed.

3. Methodology: Permitting-related decision requests are based on an "application" for the agency to make a new permitting decision or a request to renew an existing permit.

New Permits: EPA's long-term goal is to make all permitting-related decisions in six months (180 days) or less for all permit types except for Title V and NSR. For Title V, EPA's long-term goal is to make all permitting-related decisions within 18 months of the date of receipt of a complete application. For NSR, EPA's long-term goal is to make all permitting-related decisions within 12 months of the receipt of a complete application.

Existing Permits: EPA's long-term goal is to renew all existing permits before they pass their expiration date for all permits except Title V. For Title V, EPA's long-term goal is to renew all existing permits within 18 months of receipt of a complete application to renew, as described in the statute [(40 CFR Part 70.7(a)(2)].

These data will be used to calculate EPA's progress and trend in reducing the number of permitting-related decisions that exceed timeframes described in this DQR.

4. Data Limitations/Qualifications:

Assumptions

- Each month, data will be tracked for each permit type
- Any data entry errors will be corrected in subsequent months
- Data collectors will be provided with clear guidance on the methodology

Possible sources of error

- Data entry from data collectors

What is not being measured

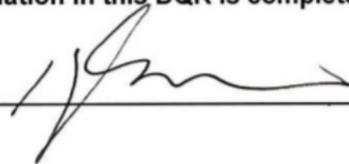
- We are not measuring the quality or enforceability of a permit decision; we are focused only on measuring permit timeliness.

5. Technical Contact/Phone Number: Laura Gentile, gentile.laura@epa.gov, 202-564-3158

6. Certification Statement/Signature

I certify the information in this DQR is complete and accurate.

DAA Signature _____



February 28, 2020

**Addendum:
Monthly Tracking of Applications for New Permits**

Program	Permit Type
Office of Water	NPDES
	UIC
Office of Air	Title V
	NSR
Office of Land and Emergency Management	RCRA
	Approval to Store, Decontaminate or Dispose of PCBs