

## Sample State Informational Letter

[NOTE: Include PQR Questionnaire, Action Item Review Forms, and PQR Reference Document with this letter.]

[Date]

Dear [Appropriate State NPDES Program Manager]:

Thank you for participating in the upcoming Program and Permit Quality Review (PQR) with EPA Region [X]. PQRs assess how a permitting authority implements the National Pollutant Discharge Elimination System (NPDES) program in accordance with the Clean Water Act and federal regulations that apply to the NPDES program. PQRs also consider EPA guidance, policies, and other best practices. PQRs include a questionnaire to complete (through written response and interview discussions) about the state's program and permitting processes, and a review by EPA of a sample of NPDES permits and supporting permit documentation. Through PQRs, EPA highlights program strengths and identifies action items for improving NPDES permit development and program implementation. By using a standard procedure to assess states' NPDES permitting programs, PQRs promote national consistency. The attached *PQR Reference Document* outlines the basis for all elements reviewed throughout this process.

[For in-person state visit]

We will be visiting your office on [Date(s)]. A draft agenda for our visit is included. For the PQR state visit, we request the following:

- A conference room to accommodate [insert total # of people].
- 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 to the *PQR Questionnaire* (attached), in written and/or verbal form.
  - Written responses should be provided at least one week prior to the state visit.
  - Verbal responses may be provided during the opening interview portion of the state visit for those items that were not previously submitted in writing.
- Responses to the *Action Item Review Forms* (attached)

Prior to the state visit, EPA will initiate a desktop review of the selected permits, fact sheets, applications, and other supporting documentation. We ask that you provide this information [insert # of weeks] before the state visit. We also ask that you complete as much of the *PQR Questionnaire* and *Action Item Review Forms* as possible.

The state visit typically begins with an opening interview with you and key permit staff. During the opening interview, we will discuss your program's permit development process, using your responses to the *PQR Questionnaire*, and we will also ask any unanswered questions from the *PQR Questionnaire*. Additionally, we will review and discuss your progress on resolving action items identified in the *Action Item Review Forms*. We also welcome any additional information regarding your NPDES program's highlights, priorities, initiatives, and challenges.

Following the opening interview, EPA will complete its review of the permit files and other materials you have provided. It will be very helpful to have the files for the requested permits available in the room or online. The permit file generally contains most of the information needed for the review. Other than some possible minor logistical support (e.g., locating copies of missing documents), EPA usually completes the permit review without state staff present.

Following the permit review, we may meet with senior technical permitting staff to ask follow-up questions on specific permits reviewed, particularly regarding the development of technology- and water quality-based effluent limits.

Finally, we will conclude the visit with a closing meeting, during which we will discuss our preliminary findings and next steps.

*[For virtual state visit]*

For this PQR, we are conducting a virtual state visit, which will include *[insert number]* conference calls, as outlined in the attached draft agenda. For the PQR, we request the following:

- 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 to the *PQR Questionnaire* (attached), in written and/or verbal form.
  - Written responses should be provided at least one week prior to the state visit.
  - Verbal responses may be provided during the opening interview portion of the state visit for those items that were not previously submitted in writing.
- Responses to the *Action Item Review Forms* (attached).

Prior to the virtual visit, EPA will conduct a desktop review of the selected permits, fact sheets, applications, and other supporting documentation. We ask that you provide this information *[insert # of weeks]* before the virtual visit. We also ask that you complete as much of the *PQR Questionnaire* and *Action Item Review Forms* as possible.

The virtual visit typically begins with an opening interview with you and key permit staff. During the opening interview, we will discuss your program's permit development process using your responses to the *PQR Questionnaire* provided prior to the state visit and we will also ask any unanswered questions from the *PQR Questionnaire*. Additionally, we will review and discuss your progress on resolving action items identified in the *Action Item Review Forms*. We also welcome any additional information on your NPDES program's highlights, priorities, initiatives, and challenges.

In a subsequent meeting, EPA will meet with senior technical permitting staff to ask follow-up questions on the specific permits that were reviewed, particularly regarding the development of technology- and water quality-based effluent limits.

Finally, we will conclude the visit with a closing meeting, during which we will discuss our preliminary findings and next steps.

We greatly appreciate your time preparing for and participating in the PQR and look forward to meeting with you on *[Date]*. If you have any questions, feel free to contact *[EPA Regional PQR contact name]* at any time.

Sincerely,

*[Name of Region's NPDES Program Manager]*

*[Position Title]*

EPA Region *[X]*

Attachments:

- Draft Agenda and List of Probable EPA Attendees
- Attachment A – PQR Reference Document
- Attachment D – PQR Questionnaire
- Attachment E – Action Item Review Forms

## Draft Agenda for PQR State Visit

*[This is a sample schedule. Additional time may be necessary at discretion of EPA and the permitting authority.]*

EPA Staff Attending: *[Insert total number]*

*[Insert staff names, if known. Identify staff as EPA Region [X] and/or EPA HQ (if applicable). Also identify if any members of the review team are contractors].*

*[For on-site state visit]*

Proposed Schedule:

Day 1:

9:00 am – 9:30 am	Introductions and schedule overview
9:30 am – 12:00 pm	Opening interview (see <i>PQR Questionnaire</i> )
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 with technical permitting staff
9:00 am – 12:00 pm	File review (continued)
12:00 pm – 1:00 pm	Lunch
1:00 pm – 2:30 pm	Updates on Action Items from previous PQR(s) (see <i>Action Item Review Forms</i> )
2:30 pm – 5:00 pm	File review (continued)

Day 3:

8:30 am – 9:00 am	Follow-up questions with technical permitting staff
9:00 am – 12:00 pm	File review (continued)
12:00 pm – 1:00 pm	Lunch
1:00 pm – 2:30 pm	Closing meeting

*[For virtual state visit]*

Conference Call #1 (3 hrs)

- Introductions and schedule overview
- Opening interview (see *PQR Questionnaire*)
- Updates on Action Items from previous PQR(s) (see *Action Item Review Forms*)

Conference Call #2 (2 hrs)

- Follow-up questions with technical permitting staff

Conference Call #3 (1 hr)

- Closing meeting