Making Backlog Reduction a Priority

Reducing the Backlog of EPA-Issued NPDES Permits

Danielle Gaito, EPA Region 1
Jennifer Wu, EPA Region 10
Kevin Weiss, Water Permits Division

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<th>New Individual NPDES Permits in Backlog (number)</th>
<th>10/1/18</th>
<th>Target</th>
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Headquarters role: Making backlog reduction a priority:

- Goals
- Monthly business meetings/Bowling charts
- Priority Action Kaizen A3
- Kaizen event and Pilot
- Branch Chief Meeting
- National NPDES Permit Backlog Elimination Strategy
National Goals for EPA-Issued Permits

NEW PERMITS
• Reduce backlog of applications for EPA-issued new NPDES permit to zero by December 31, 2019.

REISSUED PERMITS
• Reduce backlog of EPA reissued NPDES permits:
  • By 25% by September 30, 2020
  • By 50% by September 30, 2021
Progress to Date

• Backlog of new permits reduced from 106 in March, 2018 to 29 in August, 2019.

• Backlog of administratively continued permits reduced from 547 in March, 2018 to 391 in August, 2019.
Streamlining in EPA Region 1

• Standard permit and fact sheet templates.
• Group permit writing
• Limited routine meetings with permittees and routinely accommodating requests for extension of comment period.
• Expanded use of general permits.
• Standard transmittal memo/email with defined review time
Streamlining in Region 1: Lessons Learned

• Lessons learned:
  • Templates have decreased review and development time
  • Group permit writing - some permit writers enjoy, others not so much
    Important that each person know their role in the group process.
  • Transmittal memo - working well.
  • General permits are a bit of a wild card –permittees not always willing to give up individual permits.
Streamlining in Region 1: Challenges

• Challenges
  • Consultations (Endangered Species Act/Essential Fish Habitat/Coastal Zone Management Act)
  • Regulatory uncertainty (316(b), stream electric, WOTUS);
  • BPJ effluent limit development
  • Resources same folks who write permits for NH and MA also review for delegated states
  • Appeals
  • FOIAs
Streamlining in EPA Region 10 - Tools

• Standard permit templates and fact sheet templates
• Reasonable potential and water quality-based effluent limits workbook
• Consistency Book for permitting practices on our NPDES collaboration site (SharePoint)
• Standard Letters, forms, processes for permit development
• General permit versus one fact sheet for group of individual permits
• Permit writing teams (municipal permits, stormwater, aquaculture, 301(h), hydroelectric generating facilities)
• Permit writer workgroup meetings
Streamlining in EPA Region 10 - Processes

- Pending Permit Initiative – database cleanup and application withdrawals
- Permit Tracking Spreadsheets
- Kaizen events and ELMS Process (Flow Boards, Weekly Huddles)
- Standard processes (Permit application review, permit termination, electronic concurrences)
Streamlining in EPA Region 10 - Lessons Learned

• Stakeholder/EPA national interest can cause significant delays
• Process new applications in a timely manner.
• Investing time in templates and permit writing tools can be well worth the investment
• Permitting teams can increase efficiency, consistency, and quality
• Permit writers like the team work but want their own permit to work on as part of that team
• Having a one-stop collaboration site (e.g. SharePoint) is worth the investment
• Early outreach and coordination with state and tribal partners is critical
Streamlining in EPA Region 10 - Challenges

• Endangered Species Act consultations
• Regulatory uncertainty (316(b))
• Permits with national/stakeholder interest