

New Individual NPDES Permits in Backlog (number)																	
	10/1/18		Target	47	62	58	50	47	44	47	42	38	34	27	24		
	63	Decrease	Actual	54	63	59	53	53	51	41	43	42	39	32			
Existing Individual NPDES Permits in Backlog (number)												432	430	393	384		
	456	Decrease	Actual	479	456	483	474	478	474	449	432	429	432	401			

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

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

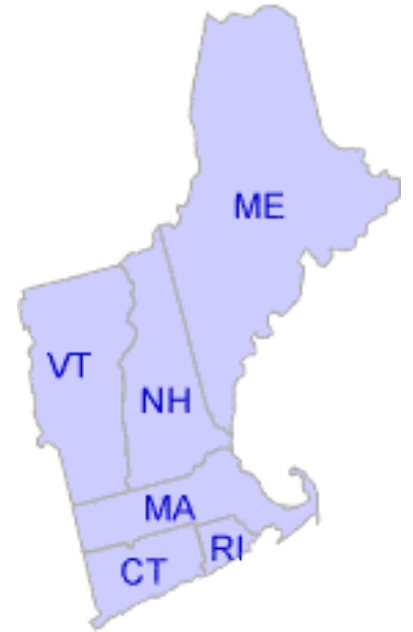


Progress to Date

- 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



Questions and Discussion