

# **NPDES Backlog Root Cause Analysis: Ohio EPA's Experiences**

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# Potential Causes for Backlog

- Late applications
- Internal staffing shortages
- Internal processing delays
  
- Ohio has approximately 3300 individual NPDES permits

# Late Applications

- Jan 2018 – 90 Facilities (not counting expired permits) had not submitted a timely renewal app and were between 1-179 days prior to the permit expiration
- Feb 2023 – 42 Facilities had not submitted a timely renewal application
- 53% percent decrease in real time late renewal apps

# Late Applications

- January 2018 – manually contacting facilities with no renewal app within 180 days of expiration.
- Call and email first as a good faith outreach, NOVs were issued, and a few orders went out as a result.
- Approach of reaching these folks AFTER the 180 mark had been crossed but hopefully getting the app submitted in plenty of time to get it renewed before expiration.

# Late Applications

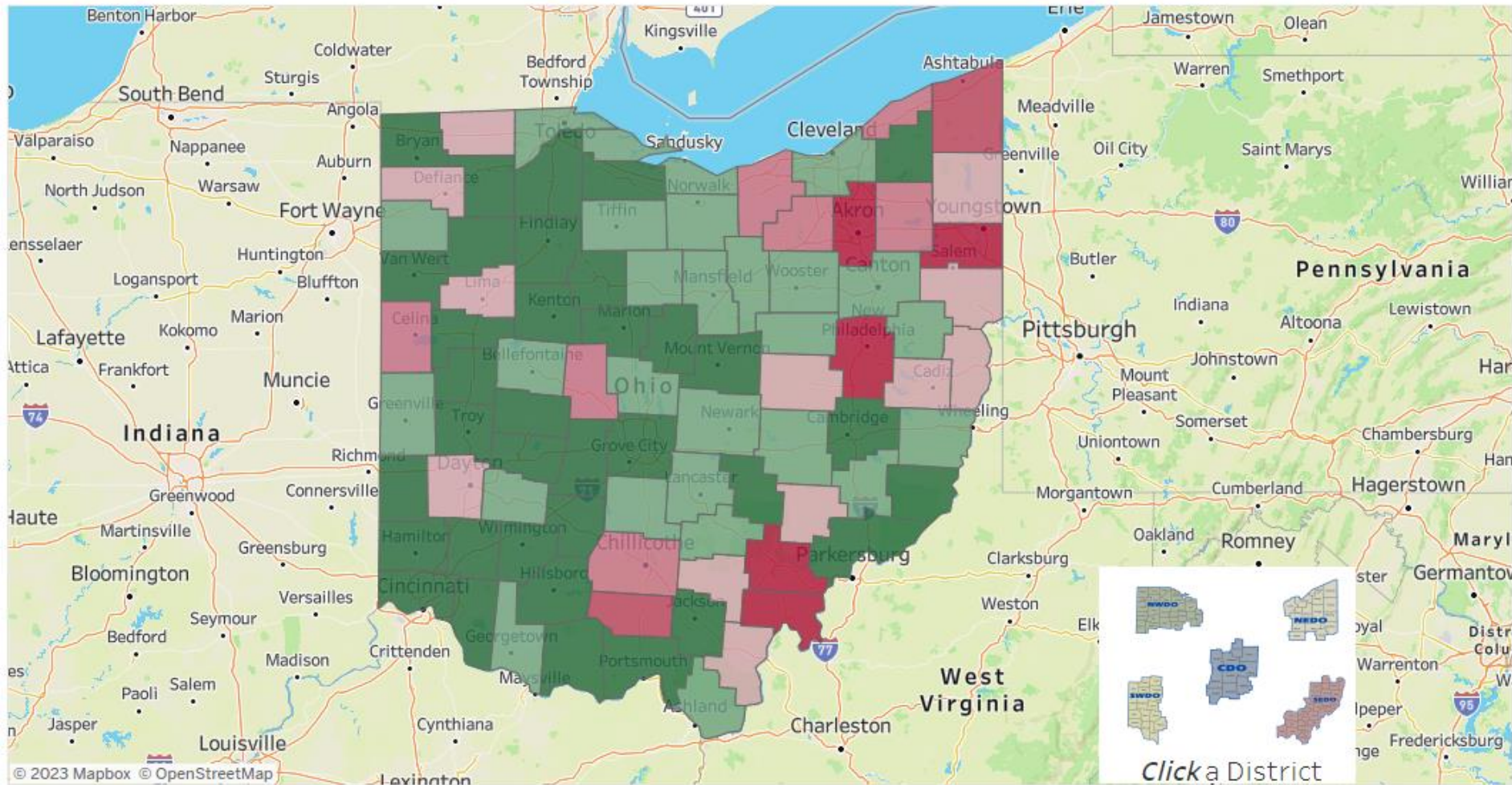
- 2023-Now incorporating “Friendly Reminder” emails prior to the App Due Date (30 days before App Due Date).
- Manually sending the “Friendly Reminders”, “Not-so-Friendly” emails a week or so after the due date. NOV is issued if no response and follows up to either submittal or enforcement.

# Late Applications

- Almost ready to implement (after beta testing) automating emails through new SWIMS permitting system. Reports will be created to know who gets the Not-so-Friendly emails and will follow up appropriately with those folks (NOV/enforcement):
  - 1<sup>st</sup> Friendly Reminder – 210 Days before permit expiration
  - 2<sup>nd</sup> Friendly Reminder – 190 Days before permit expiration
  - Not-so-Friendly Reminder - 170 days before permit expiration

# Staffing shortages/workload distribution

- Use of Tableau reports and others to track backlog
- Redistributing staff assignments to fill immediate needs



Expired: **318** (9.9%)

62 permits to reach 8%

Total: 3,209

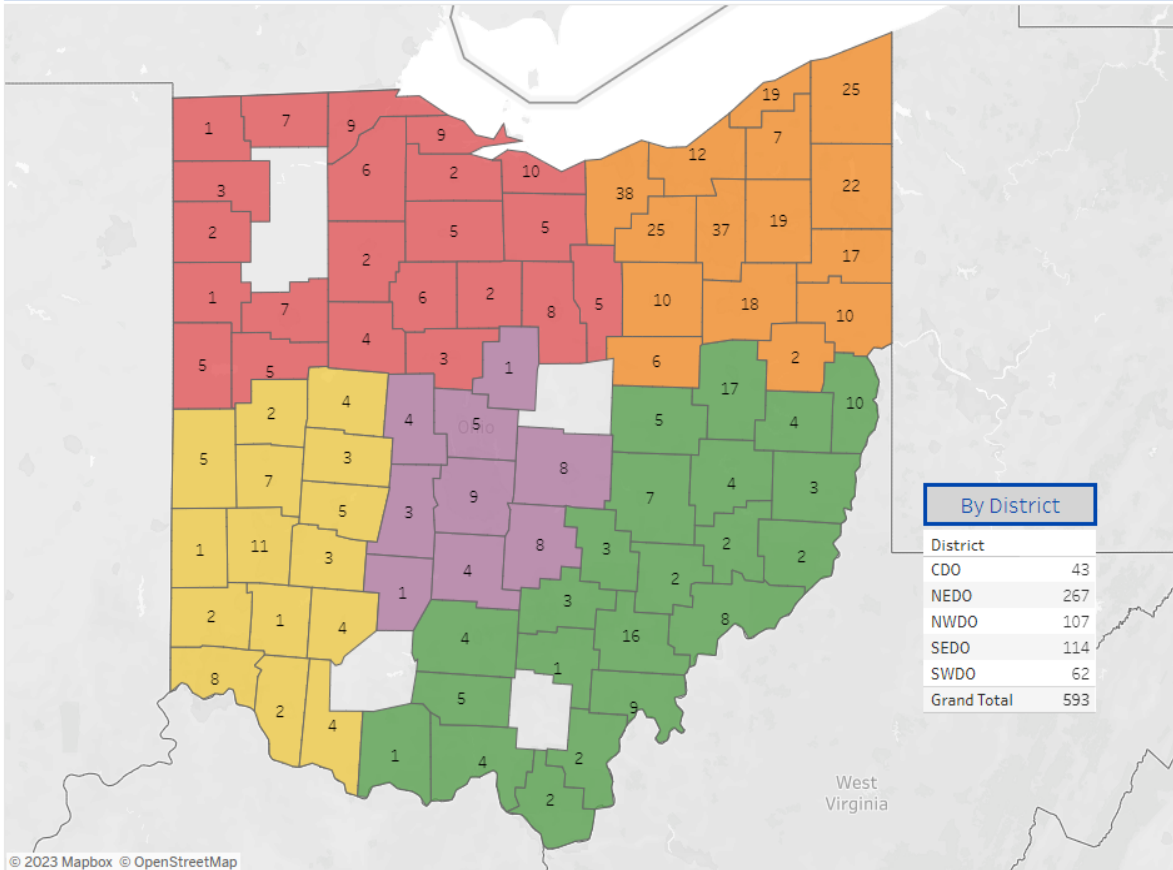
### Permit Backlog Percentages





# Renewal Status of DSW Individual Permits Expiring Within 180 Days

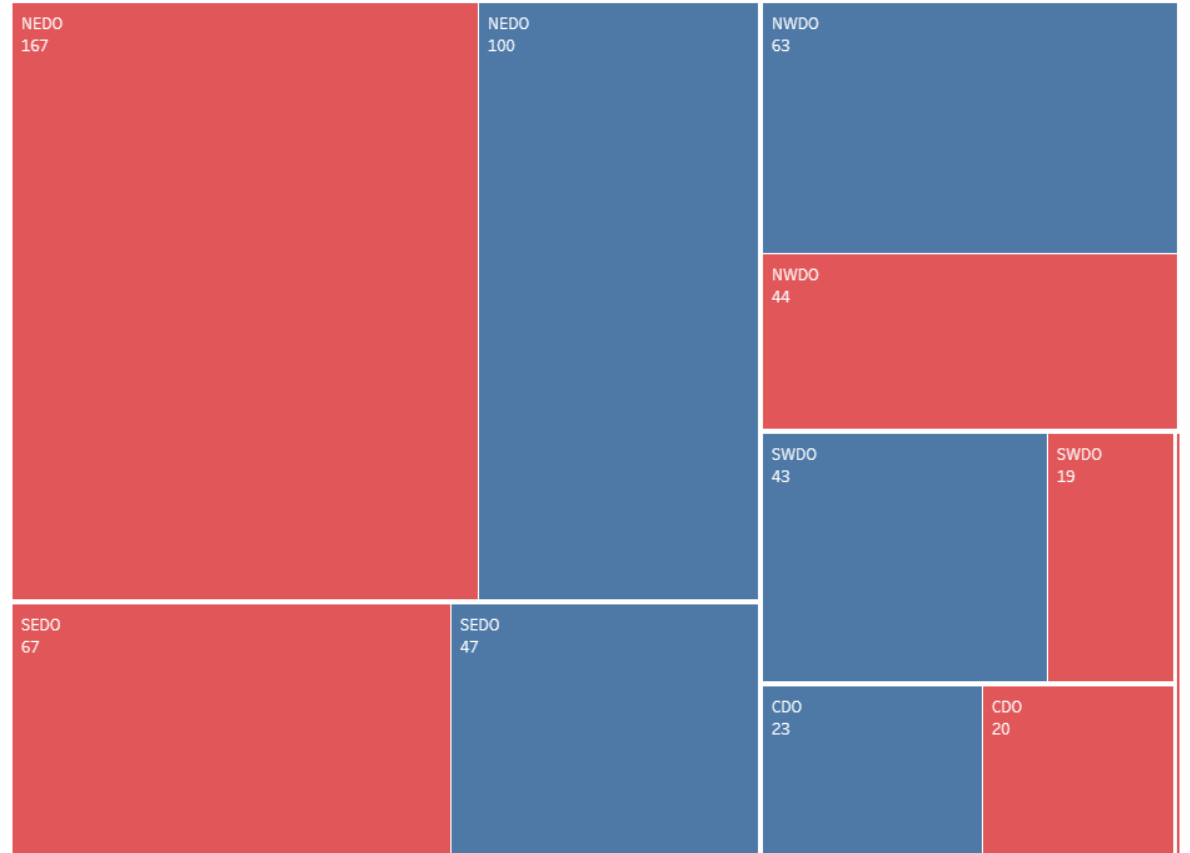
By County



By District

District	Count
CDO	43
NEDO	267
NWDO	107
SEDO	114
SWDO	62
Grand Total	593

Permit Status



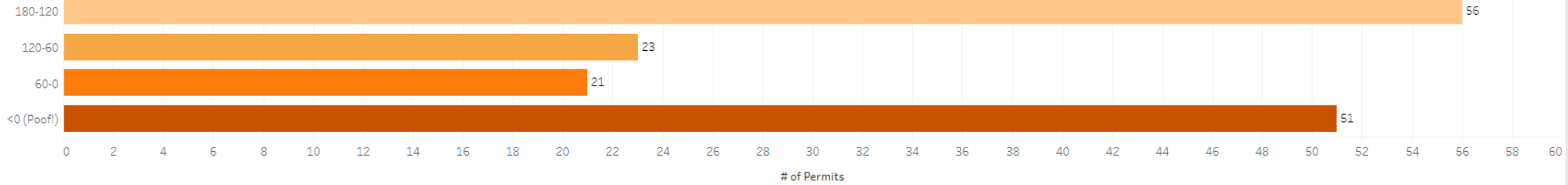
Review Status  
■ Review Time Expired  
■ Review Time Remaining



### Expiring Permits that Have Not Submitted a Renewal Application

**Summary** Number of Permits by Category: Days before Permit Expires: 
 ■ 180 to 120 days 
 ■ 120 to 60 days 
 ■ 60 to 0 days 
 ■ Poof! (past expiration)

**Days To Expiration**



**Permit Detail** Hover mouse over ● symbol in far right column to view more detail re: permit, enforcement, NPR/Revocation

Permit #	Version	Facility Name	Rating	District	County	Enf Case #	NPR/Rev	Expiration	# of Days before Permit Expires
2IJ00088	*ED	Precision Aggregates II LLC	Minor	NWDO	Wood	-	-	6/30/2022	●169
2IK00009	*DD	Wenning Poultry Farm	Signif Minor	NWDO	Mercer	-	-	4/30/2022	●108
2IK00017	*CD	Gina Dairy LLC	Signif Minor	NWDO	Van Wert	-	-	4/30/2022	●108
2IN00058	*HD	Ideal Electric Power	Minor	NWDO	Richland	-	-	6/30/2022	●169
2IN00158	*ED	Cove Avenue Property #1 LLC	Minor	NWDO	Erie	-	-	5/31/2022	●139
2IW00010	*ID	McDowell WTP *	Minor	NWDO	Wood	-	-	6/30/2022	●169
2PA00031	*HD	Edon WWTP	Minor	NWDO	Williams	-	-	5/31/2022	●139
2PA00049	*JD	LaFayette WWTP	Minor	NWDO	Allen	-	-	2/28/2022	●47
2PA00067	*KD	Put-In-Bay WWTP	Minor	NWDO	Ottawa	-	-	2/28/2022	●47
2PA00073	*ID	Latty WWTP	Minor	NWDO	Paulding	-	-	6/30/2021	●-196
2PA00102	*BD	Polk WWTP	Minor	NWDO	Ashland	-	-	6/30/2022	●169
2PB00018	*MD	Beaverdam WWTP	Minor	NWDO	Allen	-	-	2/28/2022	●47
2PP00006	*FD	LHS Maumee Youth Center	Minor	NWDO	Henry	-	-	5/31/2022	●139
2PP00019	*FD	ODOT Dist 1 Park No 1-26 & 25	Minor	NWDO	Hancock	-	-	12/31/2021	●-12
2PP00020	*GD	ODOT Dist 1 Park No 1-29	Minor	NWDO	Wyandot	-	-	4/30/2022	●108

District   
 (All) ▼

County   
 (All) ▼

Enforcement Case   
 No   
 Yes

NPR / Revoke   
 -   
 NPR   
 Revoke

Major Rating   
 Major   
 Minor   
 Significant Minor

# Days to Expiration   
 -3696 169

Expiration   
 11/30/2011 6/30/2022

Order By:   
 Permit Number ▼



# Internal Processing Delays

- Eliminating delays within our permits processing unit
- Staff retirements led to unfamiliarity
- Resolved by mapping the process and identifying efficiencies

# PPU Individual NPDES Process (Public Notice Draft)

District Office / Lead Permit Writer

