**Association of Clean Water Administrators
2023 National NPDES Permitting Meeting**

STREAMLINING THE NPDES PERMIT PROCESS

**Presented By:
Michael Richardson
Wednesday, March 1, 2020**

Background

- **What do we do?** – We, of course, process authorizations to discharge potentially polluted wastewater.

- **Individual Permits** – We issue individual permits for industrial dischargers, municipal dischargers, pretreatment permits (for non-delegated municipalities), equivalent permits and (state-only) groundwater discharge permits.
- Together there are ~ 550 issued permits.

- **General Permits –** We have 9 master general permits – Swimming Pools, Hydrostatic Testing, Surface Coal Mine, Mineral Mines, Seafood, Pesticide, Marina, Industrial SW, Construction SW.
- We also issue ISW no exposure certifications and we also have two groundwater only general permits for vehicle wash and composting toilets.
- Together there are ~ 10,000 registrations and certifications covered.

The Challenges – Getting Started

- complete application
- complete NOI
- data entry
- site visit
- read the application
- read the NOI

- technology standards
- water quality standards
- ELGs
- BPJ limits
- emergent contaminants
- PFAS
- TMDLs
- characterize the discharge
- Compliance problems
- limits exceedances
- reporting violations
- modeling

The Challenges – Drafting the Permit

- 316(a)
- 316(b)
- compliance schedules
- limits
- general conditions
- CSO
- Pretreatment
- pesticides
- CAFO
- MS4
- special conditions
- enforceable
- concise language
- understandable conditions
- grammar
- typographical errors
- footnotes match limits
- correct cross-references

compliance
conditions
limits
ms
typos
general
correct
schedules
pretreatment
understandable
language
cso
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grammar
pesticides
cafo
special
concise
enforceable
cross-references

The Challenges – Public Participation

- public participation
- incorporating EJ
- Judicial Review
- citizen groups
- NGOs
- interested parties
- elected officials
- reporter inquires
- PIAs
- write notices
- publish notices
- informational meetings
- conducting informational meetings
- conducting public hearings
- presentations
- coordination with the applicant
- handouts
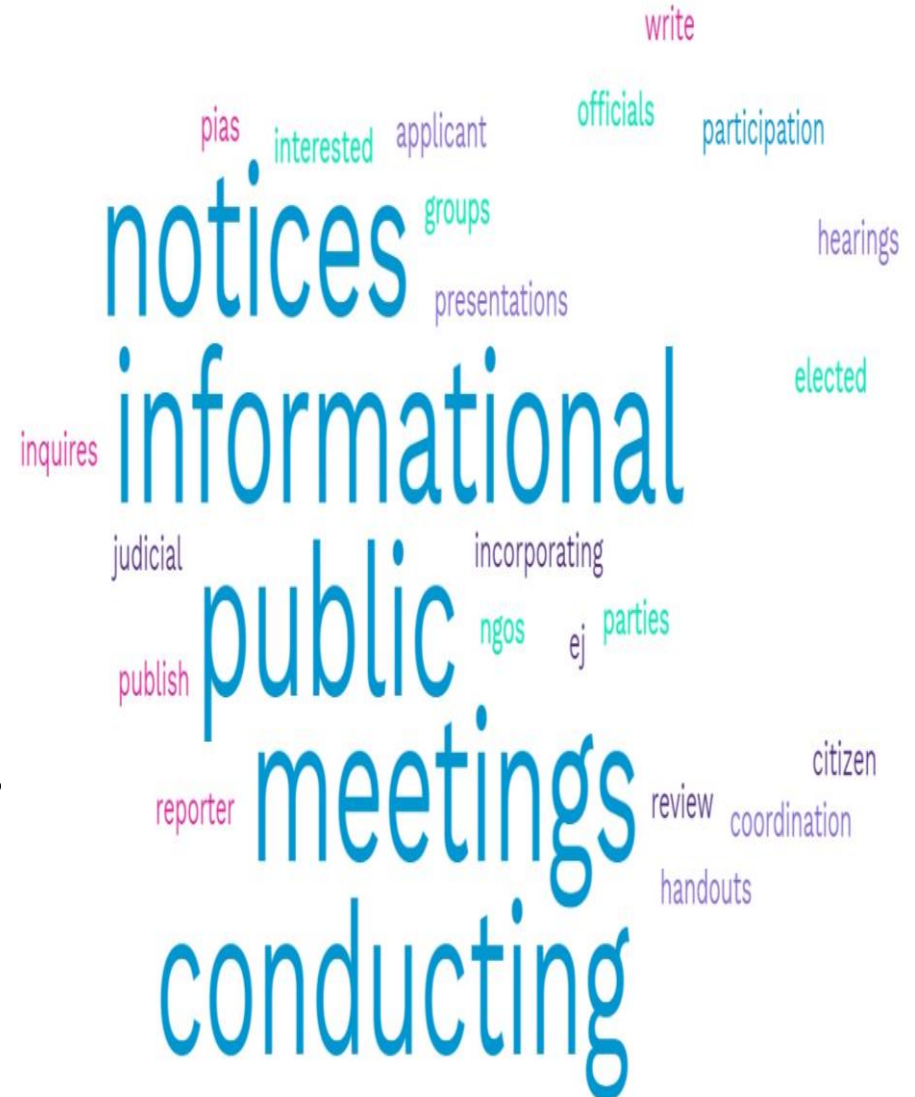
- fact sheet

- statement of basis

- public participation documentation

- privilege logs

- copies of public participation notices

- ancillary documents

participation

ancillary

website

fact

privilege

basis

public

copies

references

statement

documents

notices

logs

documentation

sheet

- paid application fees?
- paid annual fees?
- clear tax payment status
- have worker's compensation coverage
- dunning
- billing contacts

The Challenges – Other Duties

- increasing number of permits
- PQR Compliance
- training inspectors
- training regulated community
- hiring
- training new staff
- continuing training
- post-issuance questions
- tracking compliance schedules
- modification requests
- commerce requests
- coordination with other media permits
- figuring climate change
- outreach
- complaints
- customer service
- data entry
- is the permit right in ICIS
- IT Problems
- eRule compliance
- creating IT tools
- updating IT tools
- finding resources
- finding money
- IT procurement
- IT bureaucracy
- creating reports tools
- updating reports tools
- creating websites
- updating websites

Setup a Structure that always pushes you back!
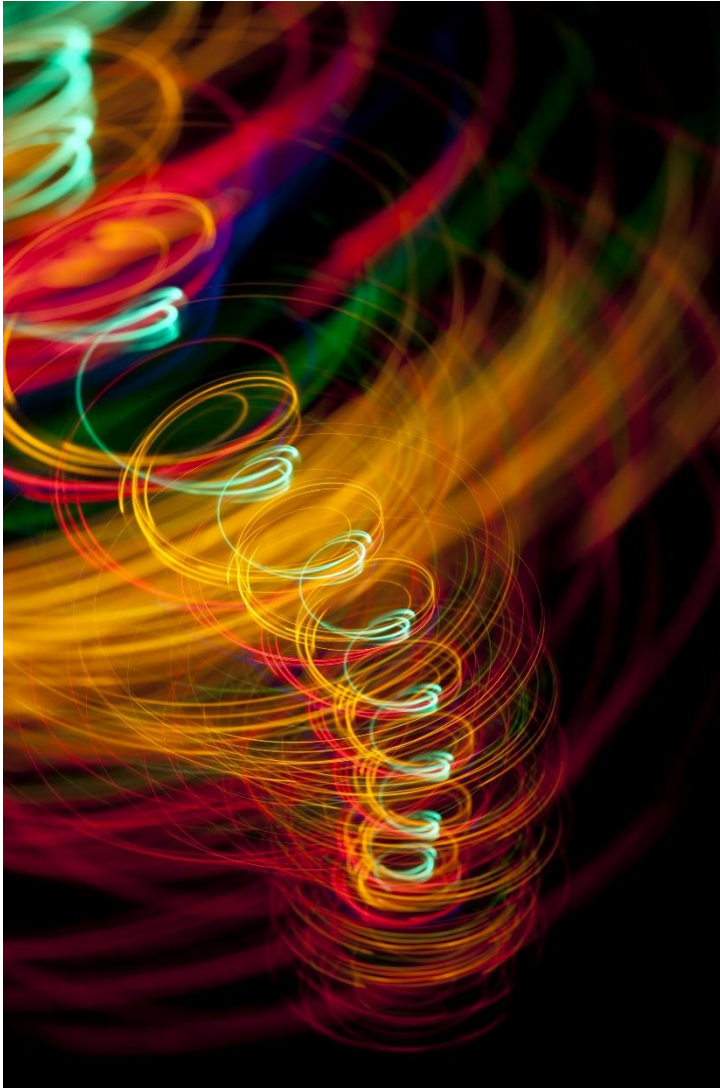
Strategies

- Templates and Checklists
- Huddles
  - Keeps an Eye on Production
  - Leans your Processes
  - Timely Status updates
- Expanding the Scope of General Permits to convert more Individual Permits
- Automated Reporting (usually weekly)
- Peer Reviewed Projects

Templates and Checklists

- Checklists - Administrative
- Checklists - Technical
- Compliance
- Fact Sheet & SoBs
- Fee Sheets
- Fiscal
- Forms (External)
- Letters
- Memos
- Permit
- Public Notice Language

Strategies – Force Focus on Projects

- Huddles
  - Keeping an Eye on Production
  - Leaning our Processes
  - Timely Status updates
- Weekly Project Review Meetings
- Monthly Staff Meetings

Expanding the Scope of General Permits to convert more Individual Permits

- Added groundwater remediation discharges to our Hydrostatic Testing GP

- Added dewatering

- Planning general permit for cooling water

Strategies – Easy Reports

Automated Reporting

- Distribute productivity reports to staff weekly

- Reports are automated

- Reports are updated and new reports are created

- We've a continually increasing the amount of data, products and information that are available through our website – Reduces questions.

Strategies – Keep Staff Engaged

Keep Staff Consistently Engaged on Permit Processing

- Weekly Huddles

- Permit Processing focuses daily chat engagement

- Peer Reviewed Projects

"Always **remember**, your **focus** **determines** your **reality**."

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Questions ?

Michael Richardson

Deputy Program Manager

Water and Science Administration

Wastewater Pollution Prevention and Reclamation Program

Michael.Richardson@Maryland.gov

(410) 537-3323