NPDES PROGRAM AND PERMIT QUALITY REVIEWS

PLANNING FOR FY24-28 CYCLE

ACWA FEBRUARY 2023

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What is a PQR?

- Review of NPDES Program implementation on 5-year cycle
 - EPA Regions review state-issued permits
 - EPA HQ reviews Region-issued permits
- Systematic, standardized review of final permits
 - Comparison to NPDES regulations and CWA requirements
 - Uses national checklist and other review/discussion tools
- Region/State discussions
- PQR report
 - Reports published on NPDES website:
 https://www.epa.gov/npdes/npdes-program-management-and-oversight
 - Trackable action items

Value of PQRs

- 1. Standardized national oversight mechanism complement to real-time review of draft permits
- 2. Routine reviews identify opportunities for continuous improvement
- PQRs foster understanding of program highlights and challenges
- 4. Transparency, accountability

Goals for Next PQR Cycle (FY2024-FY2028)

- 1. Reduce time & workload for report development and review
 - Shorter report quicker review
 - Same overall process
 - Desktop review of permit files
 - Meetings/interviews with state before, during, after desktop review
 - Review of draft report by HQ, Region, State

- 2. Focus on program updates and delivery of review findings
 - Less focus on state program background
 - Focus on PQR findings, including action items

What's Changing

- 1. Streamline report
 - Remove some background info on state program and processes
 - Move national program background (e.g., descriptions of NPDES regulatory requirements) to a single new PQR reference document
- 2. Streamline advance questionnaire, opening interview
- 3. Replace national topics with regional topic(s)
- 4. Highlight non-regulatory but high-profile initiatives: EJ, Climate, PFAS
- 5. Better information-sharing for PQR records, action items

Next Steps

HQ and Regional workgroup drafting, reviewing tools

Winter/Spring 2023

High-level review/reaction by EPA managers, ACWA *Late June 2023*

Finalize tools, launch 2024-2028 cycle

October 2023