



NPDES

National Pollutant Discharge Elimination System

Permits Unit Plan

Calendar Years 2006-2008



United States Environmental Protection Agency Region 10
Alaska, Idaho, Oregon, Washington
NPDES Permits Unit, Office of Water and Watersheds
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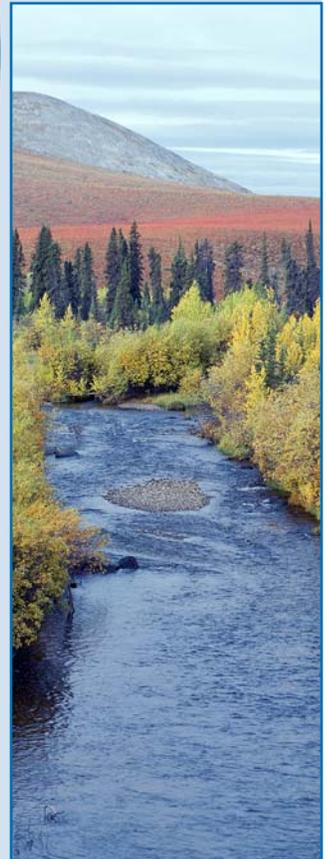


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Preface

This document outlines Region 10 National Pollutant Discharge Elimination System (NPDES) Permits Unit (NPU) plan for calendar years (CY) 2006-2008. This plan includes an overview of each core program within NPU, the goals for each followed by specific objectives to achieve those goals over the three year period. The plan is intended to be dynamic and NPU is committed to reevaluating it periodically and making changes, as appropriate, throughout this period.

Introduction

The NPDES Permit Unit (NPU) is part of the U.S. Environmental Protection Agency (EPA) Region 10 Office of Water and Watersheds. NPU seeks to improve the quality of surface waters in the Pacific Northwest and Alaska by issuing NPDES permits that protect human health and the environment.

We accomplish this by:

- ❖ Focusing our activities in those watersheds and industrial areas where maximum environmental protection and improvement can be achieved;
- ❖ Issuing permits on a schedule that minimizes our permit backlog, consistent with EPA headquarters' and Region 10 goals;
- ❖ Focusing our work within Region 10 geographic priority areas (i.e. Columbia River) and Region 10 priority industrial sectors, mining and oil and gas;
- ❖ Continuing to incorporate sludge management, pretreatment, stormwater and NEPA conditions into NPDES permits;
- ❖ Building partnerships with States, Tribes, other federal agencies, industry and the public to facilitate an understanding of the NPDES program and to build capacity;
- ❖ Applying technical expertise, innovative methods and common sense in our decision making process;
- ❖ Integrating the NPDES permits program with other organizational units within and outside of EPA Region 10's Office of Water and Watersheds;
- ❖ Promoting an organizational environment that encourages personal and professional growth, honors diversity, supports risk taking, and promotes team building.

The NPU administers five core programs in support of its mission: NPDES Permit Issuance, Pretreatment, Biosolids, Wet Weather, and National Environmental Policy Act (NEPA) Compliance. NPDES permit Unit has both direct and indirect implementation roles, as well as an oversight

position in our delegated States of Oregon and Washington. This plan represents a working model of innovation, efficiency, flexibility, and partnering that will guide the NPU during calendar year 2006 through 2008. It was developed as a collaborative effort within and outside of NPU to ensure the maximum environmental results and high customer service standards that we expect. As appropriate, it reflects performance goals established by EPA under the National Goals and Performance Reporting Act (GPRA). NPU has been preparing 3-year planning documents since 1997.

NPU faces the constant challenge of balancing increasing demands with fewer resources. Over the next several years, NPU will need to be selective and strategic in focusing our efforts on projects that will yield the most improvement in the health of people and the environment. We will need to consider the limitations of our human resources as well as contract and travel funds that support our work.

This Unit Plan is divided into five chapters representing the core programs and an additional section on State Partnerships. Each chapter begins with a general overview followed by goals and objectives. These objectives represent important functions of each program, as well as new efforts that have been identified to support the needs of the program.

This working document provides a framework to support our ongoing work, including flexibility to adapt to the new challenges that will undoubtedly arise in 2006, 2007, and 2008. We will continue to evaluate our needs and modify objectives as necessary.

NPDES Permit Program

EPA Region 10 issues NPDES permits to all facilities in Idaho and Alaska, to facilities on tribal lands in Oregon and Washington, and to federal facilities in Washington. Managing the permit program also includes permit administration (permit processing, public noticing, public hearings, data management, etc.), as well as oversight of the Oregon and Washington NPDES permit programs. Oversight of State programs and our efforts to assist States with primacy are discussed in the State Partnership section.

Between 2003 and 2005, permitting efforts resulted in 14 major and 68 minor facilities receiving new and reissued permits and 7 general permits covering 661 facilities, not including stormwater. In total, there were 743 facilities permitted in Region 10 between 2003 through 2005.

In CY 2006-2008 the Unit Plan calls for 120 permit actions, including the issuance of 10 general permits covering about 2000 facilities ranging from aquaculture to mining.

Two major goals of the permitting strategy are to meet the national target of 90% current NPDES permits of all facilities and to be 95% current on “priority permits”. Priority permits are a subset of the backlog permits and are environmentally significant permits (see Appendix A). This Unit Plan also includes objectives aimed at maintaining consistency in permit writing such as, Endangered Species Act consultation, monitoring requirements, and boilerplate language.

Appendix A describes the process used by NPU and its partners to establish the permit issuance workplan. A complete list of the permits targeted for action under this Unit Plan is contained in Appendix B. The spreadsheet forecasting tool used to project targeted permits is in Appendix D. The spreadsheet forecasting tool was developed to identify permits in order to meet issuance goals.

NPU has 10 FTE (1 vacancy for disinvestment) excluding stormwater resources dedicated to NPDES permit issuance. Meeting the permit issuance goals of this section will be a significant challenge for NPU particularly in light of projected new source activity in the region (i.e. mining in Alaska) and other unit priorities. These other priorities include the program delegation efforts in Alaska and assistance provided to our delegated States. NPU will need to continue to look for innovative methods to increase permit issuance rates and seek external resource support such as contractual support from Headquarters, potential Headquarter and other Region Office support, and capacity building opportunities in both the States of Alaska and Idaho.

Goals:

- ❖ To issue permits to facilities that have been strategically targeted for their environmental significance.
- ❖ To reduce the NPDES permit backlog to national target levels by the end of 2008.
- ❖ To target permits for issuance in order to meet Region 10 geographic and industrial sector priorities.
- ❖ To work with other units to develop a long-range plan that integrates NPDES permit writing into a comprehensive, regional watershed management program.

Objectives:

- ◆ Reduce the backlog of NPDES permits with a particular interest of reaching the national goal 10% of all NPDES permits. Attaining overall 90% current NPDES permits in the Region by the end of 2008.
- ◆ Attaining the national priority permit goal of 95% current by the end of each federal fiscal year.
- ◆ Ensuring consistency in permit writing and supporting programs.

Pretreatment Program

EPA developed the national pretreatment program to protect municipal wastewater treatment systems, human health, and the environment from the adverse impacts that may occur when hazardous or toxic wastes are discharged into wastewater systems. The goal is to prevent interference with sewage treatment plant processes, pass-through of pollutants, sludge contamination that affects beneficial uses, and exposure of workers to chemical hazards.

Basic provisions of the national pretreatment program apply to approximately 15,000 Publicly Owned Treatment Works (POTWs) in the United States. About 1,500 of these POTWs have been required to develop and implement approved pretreatment programs as outlined in 40 CFR 403. It is these approved municipal programs that administer the program in their jurisdictions and regulate the bulk of the industrial users subject to the requirements of the national pretreatment program.

Region 10's pretreatment program directly oversees the implementation of 14 approved municipal pretreatment programs in Alaska and Idaho. Additional programs may be approved for other cities during this planning cycle, including: City of Meridian, City of North Pole, City of Puyallup, and City of Post Falls. The Region also directly oversees categorical industrial users discharging to POTWs without approved pretreatment programs to assure that they comply with the federal pretreatment standards that apply to them. Since Region 10 has delegated the pretreatment program to the States of Oregon, with 24 approved cities, and Washington, with 10 approved cities, it oversees the State's implementation of the program in those States.

Over the past three years, Region 10 has completed reviews of municipal legal authorities, including local limits, and has provided significant assistance to state and municipal pretreatment staff as well as to representatives of regulated industries.

The Region is fulfilling the national goal of conducting audits and pretreatment compliance inspections on approximately 40% of the municipal pretreatment programs each year.

EPA Region 10 currently commits 1 FTE to the pretreatment program.

Goal:

- ❖ EPA, delegated States, and POTWs are managing effective programs to regulate the discharge of industrial wastewater into sanitary sewer systems.

Objectives:

- ◆ In non-delegated States, serve as the Approval Authority for cities with approved pretreatment programs.
- ◆ Assist the State of Alaska to develop and implement the pretreatment program.
- ◆ Disseminate information and provide technical support to states and municipalities regarding implementation of the new pretreatment streamlining rule.
- ◆ Provide guidance and targeted oversight, such as accompanying state inspectors on audits and compliance inspections, to the delegated pretreatment programs in OR and WA. Objective 2: Provide guidance and targeted oversight to the delegated pretreatment programs in OR and WA.
- ◆ Seek opportunities to improve elements of the pretreatment program. Objective 3: Seek opportunities to improve elements of the pretreatment program.
- ◆ Provide technical assistance and training to EPA, state, and city pretreatment staff. Objective 4: Provide technical assistance and training to EPA, state, and city pretreatment staff.
- ◆ Locate categorical industrial users (CIUs) discharging to non-pretreatment cities in AK and ID and oversee their compliance with applicable pretreatment regulations.

Wet Weather Program

Approximately 30% of identified cases of water quality impairment are attributable to wet weather events as documented in CWA Section 305(b) reports. The Wet Weather Program places controls on these discharges, which include stormwater and overflows from combined sewers and separate sanitary sewers.

Stormwater

Overview

The following categories of stormwater discharges must obtain NPDES permits:

- Industrial activities, covering 29 sectors;
- Construction activities disturbing one or more acres;
- Municipal separate storm sewer systems (MS4s) in areas with populations of 100,000 or more, based on the 1990 Census;
- Small MS4s located in Urbanized Areas, based on the 2000 Census.

Using a two-phase approach, EPA's stormwater regulations outline the permitting objectives for these discharges. Industrial, large construction (5+ acres), and large/medium MS4s are governed by the "Phase I" stormwater rules, and smaller construction sites and smaller

MS4s are permitted according to the "Phase II" stormwater rules. EPA Region 10 issues stormwater permits for such discharges in Idaho, Alaska, Indian Country, and Washington federal facilities. The Region also oversees the implementation of the NPDES stormwater program by Washington Department of Ecology (Ecology) and Oregon Department of Environmental Quality (ODEQ).

Stormwater Permitting Approach

Individual NPDES permits are typically issued for the Phase I municipalities, as well as for a few major industrial facilities. However, due to the total number of facilities requiring stormwater permits within the industrial and construction categories, both States and EPA issue general NPDES permits to authorize industrial and construction discharges. Figure 1 illustrates the total number of stormwater permittees (as well as municipal permits and applications) in the four States as of April 2005.

EPA's Phase II rules recommend general permits to permit municipal stormwater discharges. However, the use of general permits to authorize discharges from municipal storm sewer systems, has been complicated in the Pacific Northwest by a 2003 decision from the 9th Circuit Court of Appeals. This decision (Environmental Defense Center, et al. v. EPA, 9/15/03) determined that Notices of Intent for coverage under a municipal stormwater general permit must be made available for public comment and subject to public hearing. Such public notice procedures are administratively different from the "traditional" general permit model.

As a result of this court decision and other considerations, both ODEQ and EPA Region 10 will issue individual NPDES permits for Phase II regulated small MS4s in Oregon, Idaho and Alaska. Washington Department of Ecology intends to issue general permits to authorize discharges from both Phase I and Phase II municipalities, as Washington State law provides for adequate public notice and comment on general permit applications consistent with the 9th Circuit decision.

Appendix C summarizes the status of all individual and general stormwater permits issued by EPA, Ecology and ODEQ in the Pacific Northwest. As indicated, some permits listed are under development and have not yet been issued. These listings indicate applications received, unless otherwise noted.

Compliance Assistance, Public Involvement, and Consultation

By necessity, the EPA and State stormwater permit programs involve significant compliance assistance to the regulated communities about the various applicable requirements, permit conditions and available best

management practices to manage stormwater. EPA Region 10 continues to offer compliance assistance through a regional website, consultation by phone, email responses, and frequent in-person presentations and workshops to various groups.

EPA and States must also provide public involvement opportunities during the permitting issuance and reissuance process. For EPA Region 10, such work also includes government-to-government consultation with Tribes, interagency consultations with US Fish and Wildlife and NOAA-Fisheries, and discussions with water program staff within non-delegated States, on all permit actions. These discussions are often representing a first opportunity for such organizations to consider stormwater in the context of their local water quality issues. Significant compliance assistance, public involvement and consultation work will continue to be necessary by EPA Region 10, focused primarily over the next three years on the reissuance of EPA's Multi-Sector General Permit for Stormwater from Industrial Activities, reissuance of Phase I MS4 permits, issuance of the Phase II MS4 and Construction permits, and the regional NPDES enforcement program focus on the construction sector.

EPA Region 10 NPU currently commits 1 FTE towards the stormwater program.

Goal:

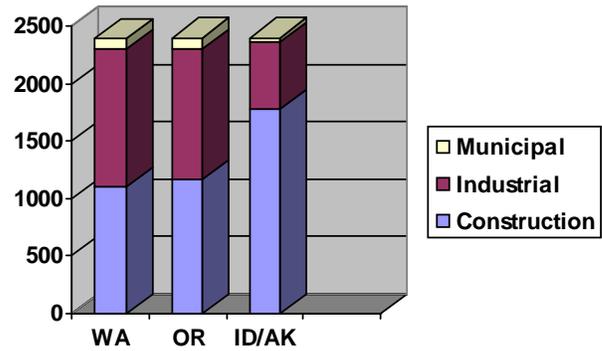
- ❖ Ensure that current NPDES stormwater discharge permits are available to operators within Idaho, Alaska, Washington, and Oregon.

Objectives:

- ◆ Issue permits to all Phase II MS4s, requiring stormwater management programs, through individual or general NPDES permit by 2008 in Idaho, Alaska, Indian Country, and federal facilities in Washington. Oversee permit issuance activities in Oregon, and Washington. *
- ◆ Issue general NPDES permits requiring stormwater pollution prevention plans for construction activities disturbing one or more acres by 2008 in Idaho, Alaska, Indian Country, and federal facilities in Washington. Oversee permit issuance activities in Oregon, and Washington. *
- ◆ Reissue the expired Multi-Sector General Permit for Stormwater from Industrial Activities, Phase I MS4 permits in Alaska, and begin work on the reissuance of the Boise Phase I MS4 permit.
- ◆ Provide continued compliance assistance to regulated entities, as resources and time allows.

* These objectives are set and measured through the National Water Program Guidance/Strategic Plan.

Figure 1



Combined Sewer Overflows (CSO)

Combined Sewer Systems are wastewater collection systems that are designed to carry domestic, commercial, industrial and stormwater through a single pipe system to the sewage treatment plant. During wet weather events (e.g. rainfall or snowmelt), the combined volume of wastewater and stormwater can exceed the capacity of the collection system, resulting in a combined sewer overflow (CSO). CSOs can impact the environment and human health. Specifically, they can cause or contribute to water quality impairments, beach closures, shellfish bed closures, contamination of drinking water supplies, and other environmental and human health problems. EPA's CSO Control Policy, published on April 19, 1994, is the national framework for control of CSOs. The Policy provides guidance on how communities with combined sewer systems can meet Clean Water Act goals in as flexible and cost-effective manner as possible. There are 15 CSO facilities in Region 10, 14 are located in the two delegated States of Oregon and Washington, and one is located in Alaska.

Sanitary Sewer Overflows (SSO)

Most of Region 10's sewers are separate sanitary sewer systems. These systems are not designed to convey large amounts of storm water runoff from precipitation events. Properly designed, operated, and maintained sanitary sewer systems are meant to collect and convey all domestic, commercial and industrial wastewater, and limited amounts of infiltrated groundwater and stormwater to a publicly owned treatment works (POTW). Occasional unintentional discharges of raw sewage from municipal sanitary sewers occur in almost every system. These types of discharges are called sanitary sewer overflows (SSOs). SSOs have a variety of causes, including but not limited to blockages, line breaks, sewer defects that allow excess storm water and groundwater

to overload the system, lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures and vandalism.

EPA Region 10 commits a fraction of a NPU permit writer's time (estimate 0.25 FTE) to oversee the CSO/SSO program in the Region.

Goals:

- ❖ EPA will continue to work on making progress toward controlling the 15 CSOs in the Region.
- ❖ EPA will continue to make progress toward reducing SSOs in Region 10 and encouraging proper operation and maintenance of collection systems.
- ❖ Maintain and build upon existing CSO/SSO programs.

Objectives:

- ◆ Develop and include standard permit language requiring permittees to provide public health notification of SSO events for all municipal permits in the Region.
- ◆ Develop standard language for fact sheets to highlight existing permit reporting requirements for SSOs, i.e. the need for communities to report SSOs. This will help support the SSO database that is being developed by the Office of Compliance.
- ◆ Work with Headquarters as they develop documentation related to permit requirements for CSOs, SSOs, sanitary sewer collection systems and combined sewer systems.
- ◆ Participate in monthly conference calls with national CSO workgroups.
- ◆ Continue to work with the States and communities as they continue to update and implement their CSO Long Term Control Plans.
- ◆ Provide assistance to States on CSO/SSO issues.
- ◆ Review and comment the City of Portland's CSO permit.

Biosolids (Sewage Sludge) Program

Region 10 implements the biosolids requirements of the Clean Water Act through the National Pollutant Discharge Elimination System (NPDES). Region 10 applies this system of permits and enforcement to the National Sewage Sludge Standards (found in 40 CFR 503), to EPA's other biosolids responsibilities under the Clean Water Act, and to the biosolids practices and issues in the Pacific Northwest. The Region has decided to minimize NPDES permits covering both biosolids and wastewater and to maximize separate "biosolids-only" NPDES permits.

As authorized in the Act, EPA promotes and supports delegation of the program to States and Tribes. The Region offers them opportunities to build State and Tribal capacity through annual joint work plans. Region 10 supports the

beneficial use of biosolids by promoting good management practices and generator accountability for the ultimate use and disposal of their biosolids. Enforcement actions are taken selectively as opportunities arise.

During 2006-2008 the biosolids program will focus on increasing and documenting the role of the States in the program. The permits element will emphasize biosolids-only permits for selected areas and/or groups of generators. The compliance program will increase the enforcement element.

EPA Region 10 NPU currently commits 1 FTE to the biosolids program.

Goal:

- ❖ To formally transfer as much of the biosolids program as possible to States and Tribes while maintaining an active EPA permits program.

Objectives:

- ◆ Delegation. EPA hopes to fully delegate the program to one State and to formally begin the delegation process for another State. States and Tribes requesting a role in EPA's program will be accommodated in joint work plans.
- ◆ Permits. EPA will issue sludge-only permits in areas of Idaho and Alaska and have work underway in the other two States.
- ◆ Compliance Assistance. Continue to provide this assistance as necessary across the Region.
- ◆ Compliance. Establish a minimal EPA enforcement presence in all States (ideally, 1-2 cases per year per State).

National Environmental Policy Act (NEPA) Compliance Program

EPA's compliance with the National Environmental Policy Act (NEPA) (42 U.S.C. §4321 et seq.), the Council of Environmental Quality (CEQ) NEPA regulations (40 CFR Parts 1500-1508), and EPA's NEPA implementing regulations (40 CFR Part 6, Subpart F) is required for:

- NPDES permits issued for new sources deemed to be major Federal actions (33 U.S.C. §1371(c)(1)); and
- Special Appropriations Act grant projects for drinking water and wastewater infrastructure improvement projects.

Implementation of the NEPA compliance program in Region 10 includes the development of environmental

analysis documents and preparation of decision documents. An Environmental Assessment (EA) provides documentation to evaluate potential impacts and the need for an Environmental Impact Statement (EIS). If the impacts are not considered significant, a Finding of No Significant Impact (FONSI) is prepared. However, if the impacts are considered significant, a comprehensive EIS is developed. The agency decision is documented in a Record of Decision (ROD). In cases of minor construction grant projects, EPA may consider categorical exclusions (CE), which exempt the project from further NEPA review.

New Sources requiring NEPA compliance in Region 10 during 2006 – 2008 include mining projects, oil and gas projects, seafood processors, aquaculture, and dairy manufacturers. Known new source projects are identified of Appendix B. These include regionally significant mining and oil and gas sources in Alaska and mining sources in Idaho. The Region will prepare NEPA documents for both individually permitted New Source projects and for general NPDES permits (covering new sources) in Alaska and mining sources in Idaho.

EPA assumes the role of lead agency in the NEPA process for NPDES permit actions that apply to discharges on private lands, State lands, or Tribal lands, and where there is no other Federal agency with a permit action. If the project occurs on Federal land, the responsible land management agency (e.g., BLM) acts as lead agency, with EPA acting as a cooperating agency. EPA is the lead agency responsible for NEPA compliance for Special Appropriations Act grant projects.

EPA Region 10 NPU currently commits 1 FTE to the NEPA compliance program in the Region. NPU has recently received NEPA support for Special Appropriations Act grant projects from the NEPA Review Unit staff and from the Alaska Operations Office. This continued support will be necessary to the success of this program during the next three year cycle particularly in light of the mining and oil and gas projects projected in the Region.

Goals:

- ❖ To fully disclose to the Tribes, the public, and other interested parties the potential environmental impacts of proposed EPA actions.
- ❖ To fully integrate the NEPA process with the NPDES program, such as joint Tribal and ESA consultations, joint public noticing of draft documents and joint public hearings.
- ❖ To work closely with our partners (other federal agencies and States) to minimize duplication of efforts and coordinate information needs for respective agency actions.

- ❖ To establish NEPA compliance priorities and manage resources such that significant environmental issues are addressed and the actions proceed to the decision-making phase on schedule.

Objectives:

- ◆ Ensure that the NEPA compliance program addresses significant environmental issues and reasonable alternatives, is fully integrated with the NPDES permits and construction grant programs, and addresses all statutory requirements.
- ◆ Provide support and technical assistance to EPA staff and identify new opportunities to streamline the NEPA compliance process.
- ◆ Ensure full public participation and establish positive working relationships with other Federal agencies, State agencies, and Tribal governments for NEPA compliance activities.

State Partnerships

EPA Region 10 has an NPDES support role in our delegated States of Oregon and Washington and a responsibility to assist Alaska and Idaho in their efforts to obtain permitting authority (primacy). Alaska will seek primacy during this Unit Plan cycle. Idaho has interest in primacy but no current plans to move forward. Providing support to Alaska is a high priority during this planning period. Support to Idaho is provided as necessary. Oregon and Washington support will be provided as specified below and varies due to the status of each State program.

EPA Region 10 NPDES State Partnership efforts are provided by existing NPDES permit writer staff. Resources in the past have been limited due to the emphasis to reduce backlog. However, due to the importance of the objectives below NPU must increase State partnership efforts during this three year planning cycle. NPU also receives State partnership support from the Office of Compliance and Enforcement and the Office of Regional Council. NPU has also received support from other offices, for example, the Office of Air and Toxics is currently providing a staff person to serve as a team lead for the Alaska Primacy effort and HQ has providing a staff person to serve as a member of the same team. NPU will need to continue to seek support from other EPA offices in order to meet both our permit writing and partnership goals.

Support the Alaska Primacy Effort:

In May 2005, the Alaska Legislature passed a bill (HB 110) allowing the Alaska Department of Environmental Conservation (ADEC) the authority to seek delegation

(“primacy”) for the NPDES program. HB 110 requires that ADEC submit an application for primacy by June 30, 2006.

EPA has committed to assist ADEC in their preparation of the application by reviewing and commenting on documents and attending stakeholder meetings. To such ends, EPA has formed a team consisting of a team lead, members of the NPDES Permits Unit, NPDES Compliance Unit, Headquarters, and ORC.

After ADEC submits an application, EPA will have to conduct an approval process. This entails a public notice of the application for comment with public hearings, tribal consultation, and consultation with the Services regarding Endangered Species and Essential Fish Habitat.

If EPA approves ADEC’s application, there will be a transition period that could last up to 5 years. During this time, ADEC will take on pieces of the program while EPA retains authority over the pieces that ADEC has not acquired. Details of the transition will be worked out in 2006.

Even after the transition, EPA will still retain authority over some facilities. EPA will still administer the permits for facilities with 301(h) waivers, facilities located outside the State’s 3-mile limit, the Annette Island Reserve, and a few areas where the State does not have jurisdiction (i.e., Denali National Park). The State is not applying to administer the Biosolids Program.

Provide Support to the Oregon Department of Environmental Quality (ODEQ) NPDES Program.

Region 10 strives to integrate State and regional priorities with EPA’s national strategic planning objectives. The Region 10 strategic plan was developed through discussions with States and Tribes. The Performance Partnership Agreement (PPA) describes how the ODEQ and Region 10 will work together to protect Oregon’s environment. Through the PPA, ODEQ and EPA work together on integrating strategic planning efforts so that the environmental priorities of each agency are most closely aligned with the environmental priorities in Oregon.

- ◆ NPU will work with ODEQ to strengthen the NPDES permit program.
- ◆ Follow-up with ODEQ on the 2004 NPDES Oregon permit program review. Work with ODEQ as they develop and implement a work plan to address findings of the NPDES Program Review.
- ◆ Continue to work with ODEQ as they develop statewide permit policies, guidance and tools to make the permits program more consistent, effective and efficient.
- ◆ Participate in the development of the Oregon internal management directives (IMDs) (i.e. guidance) on permitting issues such as the Sanitary Sewer Overflow

IMD and the reasonable potential and water quality-based effluent limit WQBEL IMD.

- ◆ Work with the State to include WQBELs in permits as needed. DEQ will finalize its reasonable potential and WQBEL IMD.
- ◆ Review a limited number of permits and provide comments.
- ◆ Work with State to collect Government Performance and Results Act (GPRA) reporting.
- ◆ Work through Performance Partnership Agreements.

Provide Support to the Washington Department of Ecology (Ecology) NPDES Program.

Like Oregon, the Performance Partnership Agreement (PPA) describes how Ecology and Region 10 will work together to protect Washington’s environment. Ecology’s NPDES program has a well run program and requires only a general type of oversight and assistance. EPA will provide oversight to Ecology in three ways:

- ◆ EPA will review Ecology’s NPDES permits:
 - The tentative schedule for review is one permit per month.
 - EPA will use Ecology’s annually submitted NPDES Permitting Plan to prioritize permits for review.
 - Ensure implementation of current TMDLs
 - At the request of Ecology, EPA will review additional permits.
 - Ecology permits will be reviewed for programmatic rather than detailed content.
- ◆ EPA will provide technical assistance to Ecology:
 - Ecology may call EPA for assistance on permitting and regulatory issues.
 - EPA will participate in Ecology’s Permit Writers’ Workgroup (PWG) in Lacey which works on permitting issues at a programmatic level. The group consists of a rotating roster of regional permit writers and Washington headquarters program staff with a management sponsor. The role of the PWG is to keep Washington’s permits up to date with regulations and requirements through maintenance of Ecology’s permit and fact sheet shells.
- ◆ EPA will assist Ecology in meeting Washington’s and EPA’s NPDES permit goals:
 - EPA will track issuance and backlog of Washington’s permits.
 - EPA will encourage Washington to meet permit commitments.