

PQR Quick Guide

This Quick Guide identifies the steps in the NPDES Permit Quality Review (PQR) process in the manner in which they are most commonly performed. The details and flexibilities within the PQR process are outlined in the PQR Standard Operating Procedures (SOP). Please refer to the full SOP document for details on performing the PQR steps.

Planning

- Prior to conducting any portions of the review, meet internally to walk through process and planned timing with all personnel involved in the review process in the region (and HQ, if applicable)
- Select Regional Topic Areas for the state (2-4 topics should be selected)
- Select permits for review
- Send kickoff letter to the state (or equivalent communication such as formal meeting, or conference call; sample letter is included in material)
- Send state advance questions (Interview questions part I) and ask for response to be provided with enough time to review prior to the state visit
- Coordinate with state (and HQ and/or regional enforcement, if applicable) to plan timing of state visit
- **Send to EPA headquarters:**
 - List of Regional Topic Areas
 - List of permits for review
 - Dates of planned visit

Review permits and fact sheets prior to state visit

- Review permits, fact sheets, and any other available background materials using the checklists
- Conduct National Topic Area reviews using materials for each topic
- Conduct Regional Topic Area reviews

State visit

- Conduct initial interview
- Review files for Core Review permits in order to complete remainder of checklist questions; may review files for National or Regional Topic Area permits if desired.
- Conduct exit interview (NOTE: following table of contents from the report template is a good guide when conducting the exit interview and writing the exit interview summary)
- **Send to EPA headquarters:**
 - Summary of exit interview

Report

- **NOTE:** In early rounds of PQR reports, EPA headquarters has heavy involvement in report review to ensure report development is fairly consistent across EPA regions and meets PQR process expectations. EPA headquarters anticipates reducing review steps once the PQR process is more established in the regions.
- Establish a report development timeline to ensure sufficient time for development and review steps. Inform any reviewers (including EPA HQ) of anticipated review dates to ensure expedient reviews.
- Draft report using template
 - Send EPA headquarters** the draft (then wait for HQ comments and incorporate prior to sending to state)
- EPA headquarters reviews draft and provides comments to region
- Incorporate comments from EPA headquarters
- Provide draft to state for correction of factual inaccuracies
- Address state comments to produce draft final report
 - Send EPA headquarters** the draft final report for last look before finalization
- Make any last corrections based on final HQ review to produce final report and provide final report to state
 - Send EPA headquarters** the final report for posting on website