

Sample State Informational Letter

[NOTE: The second enclosure to send with this letter is included in Attachment J (Interview Questions – Part 1) of the PQR SOPs]

Dear State Permitting Entity,

Thank you for agreeing to host EPA for the state visit portion of the Permit Quality Review (PQR). The purpose of a PQR is to assess whether a State adequately implements the requirements of the National Pollution Discharge Elimination System NPDES Program, as reflected in the permit and other supporting documents (e.g., fact sheet, calculations). Through this mechanism, EPA identifies opportunities for improvement in the development of NPDES permits, implementation of NPDES programs, and promotes national consistency. The recommended action items identified through PQRs may be used to determine action items appropriate for either the Region or State NPDES programs.

We will be visiting your office for two days; while there, we will be looking at permits, fact sheets, and administrative records. A draft itinerary for our site visit, which outlines the general structure of the visits, is enclosed.

For PQR meetings, we typically request the following:

- Conference room
- Administrative files for the permits being reviewed as part of the PQR
- A half day of people's time for questions
- Responses in advance to the State NPDES Informational Sheet (enclosed)

What to Expect:

The state review is preceded by a desktop review; thank you in advance for sending the permits and fact sheets. Our review criteria were developed through a collaborative effort between EPA headquarters, regions and states.

The meeting typically begins with an interview session with the permit writers to discuss the elements considered when writing permits—the presence of managers and some technical staff would be appreciated. The information provided on the State NPDES Informational Sheet submitted to EPA prior to the visit will also be discussed; feel free to provide any additional information on highlights and initiatives of your NPDES program. The second portion of the interview will consist of a discussion of the permit development process in the state and updates on other priority areas.

The interview will be followed by a file review, during which EPA will view specifically requested files (or any other outlying files you would like us to look at). Having files available in the room will greatly streamline the effort. The permit file and administrative record generally contain the majority of the information needed for the file review. Other than a little bit of logistical support (finding copies of missing documents, etc.), EPA usually conducts file reviews without state staff present.

Following the file review, we would like to meet with senior technical permitting staff to ask follow-up questions regarding how permit limits and conditions were developed, focusing on water quality and

technology limit development. The visit will conclude with a discussion of our findings and outline next steps.

We understand that you have very busy schedules and resource constraints, but would appreciate whatever time you would be able to give. We look forward to seeing you on [Date ###]. If you have any questions, feel free to contact [Joe Smith, Region X], at any time. Thanks again for taking the time to accommodate us for this review.

Sincerely,

[Name]
Chief, Water Permits Branch
EPA Region [##]

Enclosures:

- Draft Agenda
- NPDES State Informational Sheet

Draft Agenda for PQR State Visit

EPA Staff Attending:

[insert staff names] (EPA Region ##), [insert staff names] (EPA HQ); plus contractor support (Tetra Tech)

Proposed Schedule (based on state workday):

Day 1:

8:00 am – 8:30 am	Introductions and Schedule Review
8:30 am – 10:00 am	Preliminary Interview (Permitting process and workflow questions)
10:00 am – 11:30 am	File Review
11:30 am – 12:30 pm	Lunch
12:30 pm – 4:00 pm	File Review (continued)

Day 2:

8:00 am – 9:00 am	Follow-up questions (technical follow-up based on file reviews)
9:00 am – 11:00 am	File review wrap up (verifying findings; copying materials)
11:00 am – 11:30 am	Closing meeting