

Protecting the Nation's Waters Through Effective NPDES Permits

A Strategic Plan FY 2001 AND BEYOND





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STRATEGIC OUTLOOK

Since the creation of the Clean Water Act in 1972, the National Pollutant Discharge Elimination Systems (NPDES) program has been a major force in the nation's efforts to protect and restore the quality of our rivers, lakes, and coastal waters. Thirty years ago, only one-third of our waters were considered healthy. Today, approximately two-thirds are healthy. This progress has brought a wide range of environmental, recreational, and economic benefits to millions of Americans.

The NPDES program faces at least two significant challenges in the near future. First, we must safeguard our gains in water quality and strive to improve those waters still impaired by pollution. Increases in population and development will stress infrastructure, threatening the progress the nation has made. This will make future improvements to water quality more difficult to achieve. Second, the NPDES program must extend its influence beyond the traditional boundaries of the program to promote comprehensive solutions to the diverse and complex problems that continue to threaten the quality of the nation's waters. This strategic plan provides guidance and direction for making progress on both of these fronts.

Water quality protection is becoming increasingly complex—scientifically and socially. This plan, and succeeding iterations, must address this complexity by adapting to new information, emerging science and technology, and the evolving needs of stakeholders. States, tribes, municipalities, industry, agriculture, and citizens can use this plan as a guide to become active partners in the NPDES program and, more broadly, in protecting and restoring the nation's watersheds.

Because this strategic plan is intended to be a living document, Readers are encouraged to read and comment on it. Readers can find this document and much more information on our programs at our new website: www.epa.gov/npdes. Comments may be sent to the address on the next page.

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Introduction

"RESTORE AND MAINTAIN THE PHYSICAL, CHEMICAL AND BIOLOGICAL INTEGRITY OF THE NATION'S WATERS."

— The Clean Water Act

BACKGROUND

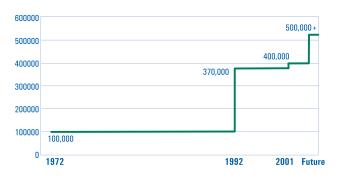
In 1972, Congress created the Clean Water Act (CWA) to address serious pollution problems affecting the nation's rivers, lakes, and coastal waters. The central objective of the Act is to "restore and maintain the chemical, physical and biological integrity of the nation's waters."

The Clean Water Act is a comprehensive set of programs and requirements designed to address the complex problems caused by a wide variety of pollution sources. One of the cornerstones of the Act is the National Pollutant Discharge Elimination System (NPDES), which regulates the discharge of pollutants into the waters of the U.S. Under the CWA, NPDES permits are issued to industrial, municipal, and other point source dischargers by either EPA or an authorized state.

NPDES Permit Program Accomplishments

Over the past 30 years, the NPDES program has played a key role in restoring the quality of the nation's waters. In 1972, only one third of our rivers, lakes, and coastal waters were considered fishable

Figure 1. Growth of the NPDES Program (number of facilities or sources)



and swimmable. Today, approximately two thirds of our waters are healthy. More than 50 categories of industry (including several hundred thousand businesses) and the nation's network of more than 16,000 municipal sewage treatment systems comply with standards implemented in NPDES permits. These permits have resulted in the removal of billions of pounds of conventional pollutants and millions of pounds of toxic pollutants annually.

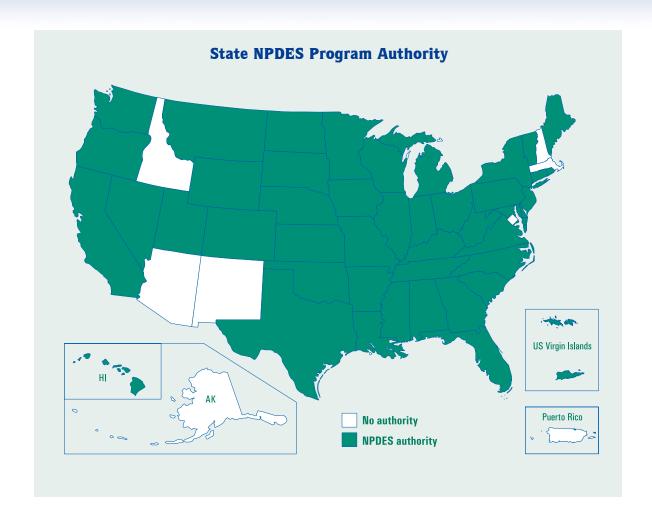
Scope of the NPDES Permit Program

Since the inception of the NPDES program, the number of facilities required to have NPDES permits has quadrupled. This growth is the result of a number of changes to the program, including reauthorization of the CWA in 1987, which significantly expanded the scope of the NPDES program. Figure 1 shows the growth in the number of sources required to have NPDES permits. Today, more than 400,000 facilities are required to have NPDES permits. EPA expects that this universe will continue to grow, particularly with the implementation of new storm water requirements in 2003. Figure 2 describes the types of facilities covered by the NPDES program.

Figure 2. Who Must Have an NPDES Permit?

The Clean Water Act requires anyone discharging pollutants from any point source into waters of the U.S. to obtain an NPDES permit from EPA or an authorized state. Typical point sources regulated under the NPDES program include:

- Municipal wastewater systems
- Municipal and industrial storm water systems
- Industries and commercial facilities
- Concentrated Animal Feeding Operations



A Strong Partnership with the States

Today, 44 states and one territory are authorized to implement the NPDES program. State implementation is a fundamental concept that runs throughout the Clean Water Act and is also a cornerstone of the NPDES program. A state's authorization to implement this program allows state managers to set priorities and tailor the program to meet the challenges facing the waters in that state and to satisfy the desires of its citizens. EPA works closely with the states to ensure a level of national consistency and assist states in meeting their environmental goals and objectives. As "co-regulators," the authorized states play a unique role by helping to shape and develop the national program. This year EPA will implement several ideas to strengthen this partnership (see Strategic Issues and Key Actions).

Our Stakeholders

Stakeholders play a critical part in the implementation and development of the NPDES program. EPA plans to take several steps this year to improve communication and coordination with our stakeholders. Our stakeholders include:

- States, tribes, and territories
- Regulated community (e.g., industry, agriculture, and municipalities)
- Citizens
- Interest groups
- Congress
- Other federal agencies

Relationship to EPA's Strategic Plan

EPA's 2000 Strategic Plan provides an overall framework for achieving the Agency's mission "to protect human health and safeguard the natural environment." This NPDES Program Strategic Plan is intended to support that overall mission. Specifically, the NPDES program directly supports Goal 2 of the overall EPA Strategic Plan, which is entitled "Clean and Safe Water." There are two specific objectives related to the NPDES program.

Objective

"By 2005, increase by 175 the number of watersheds where 80 percent or more of assessed waters meet water quality standards."

Result

"By 2005, 5,000 additional miles of water will attain water quality standards and specific interim milestones will be achieved in 50,000 impaired miles."

Objective

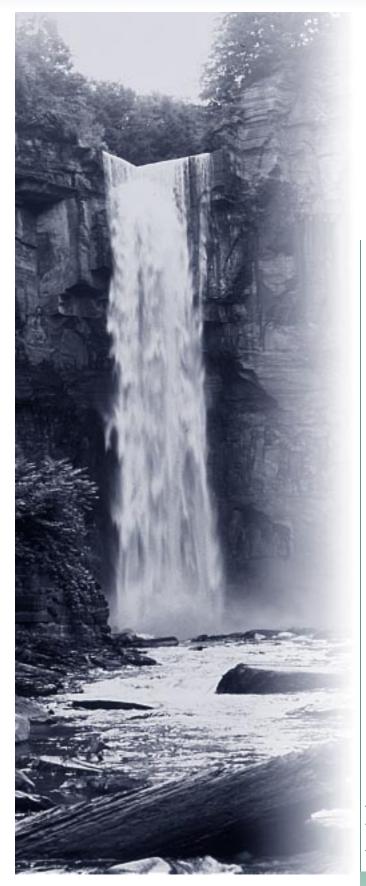
"By 2005, reduce pollutant loadings from key point and nonpoint sources by at least 11 percent from 1992 levels."

Result

"By 2005, using both pollution control and prevention approaches, reduce at least 3 billion pounds of pollutant source loadings from key sources including a combined 11 percent reduction from industrial sources, POTWs, and combined sewer overflows (CSOs)."

For more information on EPA's Strategic Plan, see www.epa.gov/ocfopage/plan/plan.htm.

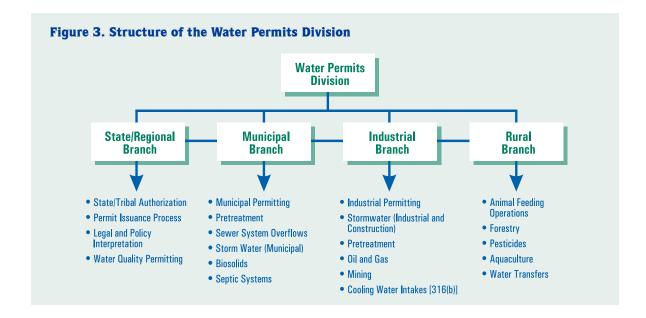
Measuring and reporting environmental results is a significant element in EPA's strategic planning efforts and, in fact, is mandated under the Government Performance and Results Act (GPRA). EPA has developed a set of measures to help document the success of the NPDES program and will continue to refine them to reflect program accomplishments (see *Strategic Issues and Key Actions*).



WATER PERMITS DIVISION ORGANIZATION AND RESOURCES

Organization

EPA's Water Permits Division is proud of its contributions to the development of and ongoing leadership role in the NPDES permit program. Recently, the Water Permits Division implemented a new organizational structure to foster improved implementation of the NPDES permit program and to better address stakeholder needs. Figure 3 shows the Division's structure and general areas of responsibility.

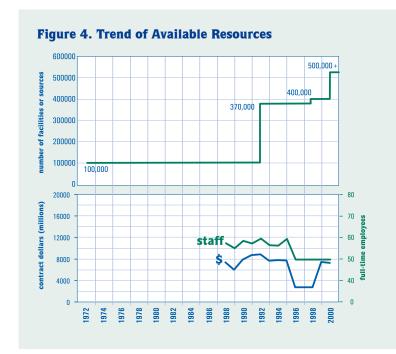


Resources

The Water Permits Division has three primary categories of resources available to accomplish its mission:

- Skilled employees
- Funds for contractor support
- Funds for grants to states, municipalities and others

Figure 4 compares the growth in the number of facilities covered by the NPDES program to the relatively stable level of the program's resources. Over the last decade the number of facilities included in the NPDES program has risen dramatically while the Water Permits Division's resources have remained essentially constant. Resource levels in the Regions and States have remained constant as well.



CURRENT PROGRAM IMPLEMENTATION ACTIVITIES

This strategic plan focuses on new and cross-cutting activities. The following section is intended to provide a brief overview of the ongoing activities in each major program area.

NPDES Program Implementation

- Support state NPDES programs, including
 - Assessment of state program health, including recognition of vulnerability trends and innovations within the program, with potential regulation revisions
 - Electronic reporting, including automated NPDES permit applications and discharge monitoring reports
 - Assistance to tribal governments on NPDES issues and programs, including authorization
 - Coordination with other federal agencies, particularly on the Endangered Species Act and National Historic Preservation Act
- Ensure quality and consistency in state NPDES permit programs, including state program authorizations, modifications, and review of petitions for state program withdrawal.
- Develop and implement strategies to ensure timely NPDES permit issuance.
- Develop and provide training programs, including:
 - NPDES Permit Writer's Course
 - NPDES Permit Applicant's Course
 - Pretreatment Courses
 - Storm Water Implementation Course
- Implement water quality permitting requirements and policies, which include:
 - Supporting development and refinement of sound water quality standards
 - Implementing policies to ensure NPDES permits reflect Total Maximum Daily Loads
 - Implementing Whole Effluent Toxicity testing policies
 - Developing water quality permitting quidance



Storm Water Program

 Ensure effective implementation of the Storm Water Program, including Phase I, Phase II, and reissuance of the Multi-Sector General Permit.

Sewer System Overflows

- Develop and implement a program to address sanitary sewer overflows (SSOs), including a proposed rulemaking to address system management and overflows from over 16,000 municipal sewer systems nationwide.
- Fully implement the Combined Sewer Overflow (CSO) Control Policy, including development of a CSO water quality standards guidance, an implementation tracking system, performance measures, and requirements of the Wet Weather Water Quality Act of 2000.

Pretreatment Program

 Continue implementation of the National Pretreatment Program, including finalizing the pretreatment streamlining rule and the Pretreatment Program Project XL rule.





Rural Program

- Implement the USDA-EPA Animal Feeding Operations Strategy, including
 - Work with states to increase permitting of existing Concentrated Animal Feeding Operations (CAFOs)
 - Issue revised regulations for Concentrated Animal Feeding Operations (CAFO)
 - Conduct outreach and support training for states, the agriculture industry and the public
 - Work with USDA to implement voluntary programs for animal feeding operations

Administrative Systems

- Improve training and development programs for staff
- Upgrade accounting, strategic planning, and administrative support systems.

OUR VISION: EVERY WATERSHED IN THE U.S. IS FREE FROM IMPAIRMENTS CAUSED BY INDUSTRIAL, MUNICIPAL, AND OTHER POINT SOURCE DISCHARGES.

OUR MISSION:

EPA, in partnership with authorized states, will develop, support, and manage the NPDES permit program to protect and restore the nation's waters.

EPA's Water Program:

Shapes National Program Direction by identifying issues of national or regional concern and developing and implementing realistic strategies to address these issues.

Produces Policy and Regulation to address problems affecting the nation's waters, while preventing transfer of environmental problems to the air and land.

Develops Technical and Administrative Tools

to help state and EPA permit writers and program managers implement solutions through NPDES permits.

Tracks and Manages Information on permit issuance, permit quality, and point source pollution abatement to measure the effectiveness of the NPDES program and refine its management.

Communicates with Stakeholders by informing them of program goals and providing them with policies and information to foster more effective participation in the NPDES program.

CHALLENGES ON THE HORIZON

A wide variety of factors influence how we work to protect watersheds. The following issues have helped to shape our strategic plan and will continue to influence implementation of the NPDES program. In coming years, we will continue to update and refine this list of issues and this plan.

Watershed Driven Solutions to Address Remaining Water Quality Challenges

Over the last 30 years, we have made great progress nationally in addressing large-scale water pollution problems from a relatively limited universe of municipal sewage treatment systems and major industrial sources. Indeed, our efforts have substantially improved the quality of the nation's rivers, lakes and coastal waters. Nevertheless, there are still significant water quality challenges ahead.

The nature of these remaining water quality problems is very different from those faced in the early years of this program. Remaining sources tend to be much smaller, more numerous and more widely distributed, and less amenable to traditional end-ofpipe controls. For instance, effectively addressing several hundred thousand storm water sources and thousands of concentrated animal feeding operations around the country requires innovative approaches.

Further complicating this picture is the fact that each watershed has unique physical and hydrological characteristics and may be stressed by a unique combination of pollution sources, including both

point and nonpoint (runoff). As a result, a significant challenge will be to reorient the NPDES program to better address the specific needs of individual watersheds.

New Watershed Science

EPA conducts research on the impacts of pollutants on watersheds. Our knowledge of watersheds and the complex interaction of pollutants within different types of watersheds has increased in recent years. As a result we are now able to begin establishing water quality standards to address remaining problems, such as nutrient and pathogen pollution. Because these pollutants impact ecosystems in a variety of ways, they present special challenges for the NPDES program. A detailed understanding of the hydrological and biological characteristics of each affected watershed is needed to develop and implement permit limits and other controls.

Total Maximum Daily Loads

Total Maximum Daily Loads (TMDLs) are essentially pollution budgets for specific river segments or other waterbodies. EPA and the states are scheduled to develop as many as 40,000 TMDLs over the next 15 years. The development of TMDLs is scientifically, legally and politically challenging. In addition, the workload associated with implementing 40,000 TMDLs will present significant management challenges to EPA and the states.

Program Expansion and Evolution

The scope of the NPDES program has continued to expand since its inception. As we move toward fuller implementation of the watershed approach, the NPDES program will need to better address remaining sources of pollution (including storm water and concentrated animal feeding operations). New efforts will include innovations and partnerships such as comprehensive environmental management systems and "best management practices" for non-traditional sources in lieu of end-of-pipe controls. Working closely with the states and other federal partners will be crucial to ensure that new approaches achieve real environmental results.

The Information Age

The information age has ushered in a new and important role for EPA. With the advent of the Internet and major advances in geographic information technology, we are now able to provide the public with a wealth of information about the characteristics of the watersheds in which they live. The NPDES program has much to contribute to the growing body of watershed information. We must also improve our data collection efforts to include newer categories such as storm water, concentrated animal feeding operations, and sewer system overflows. Web technology also offers new and innovative ways to collect and disseminate information.

New Initiatives

The NPDES program must always be ready to address new developments. Congress, the Administration, court decisions, and developments around the country can have a significant impact on the direction and focus of the NPDES program. Our strategic plan must be flexible enough to accommodate changes; therefore, we will update it regularly.

AN EFFECTIVE STRATEGIC PLAN MUST IDENTIFY AND OFFER A CLEAR PLAN TO ADDRESS KEY ISSUES.

OVERVIEW

A strategic issue is a fundamental policy question or challenge related directly to an organization's mission. To formulate our strategic issues, we carefully considered a wide range of factors, including environmental priorities and trends, future challenges, mandates, the needs of our partners and stakeholders, and resources.

This process led to the identification of eight strategic issues. The next step was to identify the actions necessary to begin addressing each issue. This plan highlights major courses of action designed to help address each strategic issue. These strategic issues and key actions create the framework for this strategic plan and will, in turn, define and shape actions, programs, policies and resource allocations for the coming years.



SUMMARY OF STRATEGIC ISSUES AND KEY STRATEGIC GOALS AND KEY ACTIONS 2001-2006

ENVIRONMENTAL ISSUES

1. Support Watershed Planning

Description of the Issue

In order to continue improving the quality of the nation's waters, we must tailor our strategies and programs to the specific needs of individual watersheds. Past efforts have focused largely on national, "one-size-fits-all" programs rather than more flexible watershed-oriented approaches. The nature and diversity of the water quality challenges ahead require us to reinvent the concept of permitting and, perhaps, the entire NPDES program. Working in close collaboration with a broad array of stakeholders is imperative to successful implementation of watershed strategies. Further, taking a broader, more flexible view of our program in a watershed context will be required to move forward with solutions that will improve water quality. Our challenge is to find ways in which the NPDES program can adapt to these challenges and actively promote watershed-based strategies.

Strategic Goal: Restructure the permits program and seek changes in the water quality standards, TMDL, and enforcement programs to promote planning, development, and implementation of environmental programs on a watershed basis.

Priority setting is the key to the watershed approach and must be considered at two levels. First, priorities must be set among watersheds—for those that are most impaired and those that are most in need of protection. Second, within high-priority watersheds, potential restoration and preservation actions must be evaluated and prioritized. For the NPDES program, such priority setting will help determine where, when, and how we will reissue NPDES permits and implement new standards and TMDLs.

Much of the decision making in a watershed framework occurs at the state and local level. Nationally-led programs, such as the NPDES program, must constantly work to develop management tools and other opportunities for flexibility that enhance state and local leadership. The NPDES program has begun exploring the potential for municipal "integrated watershed" permits to further this kind of local decision making and flexibility.

Key Actions

By December 2002, sponsor the development of pilot integrated watershed NPDES permits that bring together the full range of municipal programs (e.g. pretreatment, CSOs, SSOs, storm water) on a watershed basis.

By December 2003, develop guidance on prioritizing permit issuance according to the status and condition of watersheds.

2. Permit and Program Quality, Consistency, and Innovation

Description of the Issue

The issuance of an NPDES permit represents the culmination of much effort by many programs under the umbrella of the Clean Water Act. Water quality standards, technology-based requirements, and TMDLs all find their final expression in the text of NPDES permits. Because NPDES permits are fundamental to the Clean Water Act, the quality and completeness of each permit is critical. As mentioned earlier, EPA and the authorized states share responsibility for implementing the NPDES program. State administered programs promote day-to-day decision making at a level more attuned to the situation in individual watersheds. One of the primary challenges inherent in any delegated program is maintaining the appropriate balance between these objectives. EPA's challenge is to provide management tools, technical assistance, and guidance to support the states in their efforts to implement the NPDES program and, at the same time, ensure a reasonable level of consistency across the country.

Strategic Goal: Improve the integrity, consistency, and effectiveness of the NPDES program by providing better management tools to the states.

In 1999, the EPA Inspector General reported that the number of permits exceeding their five-year lifetime



had grown substantially and that this situation warranted significantly increased attention by the states and EPA. This problem continues to be identified and managed as a "material weakness" in the Federal Managers Financial Integrity Act (FMFIA) report. A related issue facing the program is the increasing number of lawsuits and petitions challenging states on their implementation of the NPDES program. These legal actions seek to have EPA withdraw the NPDES program (or portions of it).

In order to address these issues, EPA and the states have initiated efforts on several fronts to help us meet the goal of improved integrity, consistency, and effectiveness of the NPDES program. EPA and the states have adopted a detailed strategy to address the timely issuance of permits. In addition, EPA and the states are working to build a comprehensive set of tools to assist states in their management of the program and to improve the quality of the permits they issue. Additionally, EPA and the states will be working together on a longer-term project to improve the information and management systems that support the NPDES program.

Another management tool, known as environmental management systems (EMS), could be effective in meeting this goal and the broader goal of clean water. Environmental management systems are comprehensive and proactive systems that help organizations manage their facilities and programs in ways that promote long-term compliance with environmental requirements. Such systems help promote corporate and organizational responsibility and frequently minimize the need for government inspections and enforcement actions. Our challenge will be to find opportunities to build these concepts into our new initiatives and existing programs.

Key Actions

By December 2001, complete the assessment of permit quality and provide tools and assistance to states to assist them in making any needed improvements.

By December 2001, Water Permits Division will continue to emphasize the goal of reducing the backlog of major permits to 10% or less and will work closely with Regions and states towards its achievement.



During 2002, develop a package of management tools, guidance, and assistance to support states in maintaining and improving the overall health of the NPDES programs in preparation for piloting in several states.

During 2001, look for opportunities to extend the environmental management systems concept within the NPDES program. Document opportunities and set priorities by December 2001.

By December 2004, Water Permits Division will continue to emphasize the goal of reducing the backlog of all permits to 10% or less and will work closely with Regions and States towards its achievement.

3. Standards to Permits

Description of the Issue

Incorporating water quality standards into permits can be a complex process. The water quality standards being developed today are scientifically more complex and often require specialized implementation in different ecological regions. TMDLs add another layer of complexity in that a given facility must be considered within the context of the watershed and the other sources of pollution in that watershed. Further complicating this picture are several factors including: the need to consider





varying hydrological conditions (wet and dry weather), some outdated water quality standards, inappropriate classification of waterbodies, inconsistent availability of water quality data, and lack of standardized water-quality-to-standards translation methodologies.

Strategic Goal: Guide the consistent and effective translation of water quality goals and standards into permit limits and conditions.

In the near future, the workload associated with implementing the NPDES program is expected to increase dramatically. The authorized states will need substantial assistance from EPA to remain successful. Our challenge will be to provide the technical assistance, training, and guidance to ensure that states have clear policies for translating standards to permits and that NPDES permits reflect the latest water quality and technology-based standards, and TMDLs in a timely manner. The NPDES program will also need to be more actively engaged with the water quality standards, effluent guidelines (technologybased requirements) and TMDL programs to ensure that the needs of permit writers are considered as these programs evolve.

Key Actions

By October 2001, establish regular communications with EPA regional and state permit writers on emerging standards-to-permits issues and problems.

By November 2002, complete updates and final revisions to EPA's basic guidance on developing water quality-based limits in permits.

By September 2003, complete initial reviews of the health of state water quality permitting programs and document and distribute state innovations in the standards-to-permits process.

PROGRAM ADMINISTRATION ISSUES

4. Modernizing the Permit Management System

Description of the Issue

Information technology has radically changed the way data and information can be collected, managed, and made available. The information systems that support the NPDES program are now obsolete. The latest advances in information technology afford us many opportunities including: development of more effective management systems, streamlined data collection, geographic referencing and integration with other water-related information, and online access for the public.

Many states have made significant progress in developing and using online data systems. Using new technologies, the NPDES program needs to be supported by a new information system that connects with and enhances these efforts. Our challenge is to develop technology that will streamline the permitting process, provide for easier and more meaningful access to information, and integrate with existing state systems.

Strategic Goal: Develop an efficient and effective NPDES information management system (that automates and streamlines the permit application, issuance and administration process) utilizing state-of-the-art technology and building upon existing state innovations.

One of the most important aspects of this effort will be the move from paper-based to highly efficient, online applications and reporting forms. Coordination with the Agency's other information management programs will also be essential.

Key Actions

By September 2001, begin pilot implementation of electronic NPDES permit application and reporting forms.

Continue to support EPA's efforts to develop and implement all aspects of this new NPDES information system.

5. Measuring Environmental Results

Description of the Issue

Measuring and reporting of environmental progress and results are critical aspects of managing any environmental program and serve as the basis for communicating progress and for public accountability. In 1993, Congress passed the Government Performance and Results Act (GPRA) to focus and improve the federal government's efforts in this area. During the last seven years, the NPDES program has developed and implemented a set of measures, but we still have much work to do. Presently, the program collects information and data necessary to support program implementation, but our ability to describe environmental results is limited. Our challenge is to work with states, municipalities, and industry to develop a framework for expressing environmental results and an agreement on the information that will be gathered to support it.

Strategic Goal: Improve the measurement and reporting of environmental results for the NPDES permit program.

The most important step in creating measures of environmental results is to identify the questions we want to answer about the effect of the NPDES program on water quality. Then we can determine what additional information we need and incorporate it into our existing information management systems.

Key Actions

By December 2002, work with our stakeholders to develop a revised framework for environmental results measurement for all facets of the NPDES program.

6. Better Communication and Participation of Stakeholders

Description of the Issue

EPA and the states are involved in a unique partnership for the implementation of the NPDES program. In order for this partnership to succeed, we must maintain close lines of communication. We are increasingly aware that successful implementation of the NPDES program is contingent upon constant communication between EPA and the states in every aspect of the program, from policy development to implementation to enforcement. Success of the NPDES program also depends on the informed and active involvement of key external stakeholders including the regulated community, interests groups and the public. We recognize the need to work more closely with the full range of groups interested in and affected by the NPDES program.

Finally. EPA and the states share responsibility for making information available to the public. New technologies, such as the Internet, provide enhanced opportunities to disseminate information. Our challenge will be to use both new and traditional methods to provide high quality, understandable information to the public.

Strategic Goal: Improve communication with and increase the involvement of stakeholders in the implementation of the NPDES program.

A good starting point for better communication with the states is to establish a core group of representatives to voice the perspectives and concerns of their jurisdictions. For our external stakeholders, we will ensure our web site meets their diverse needs—providing a range of information from training courses to guidance documents—and provides them with the opportunity to participate in our efforts.







Key Actions

By June 2001, EPA will launch a new NPDES web site at www.epa.gov/npdes to provide greatly expanded access to information and services.

By December, 2001, EPA will initiate an Executive Council to help guide the development and implementation of the NPDES program. The Council will include state and EPA representatives and will advise EPA management on a full range of issues facing the NPDES program.

By December 2001, EPA headquarters will develop a refined and expanded communications plan for the NPDES program.

7. Planning and Administration

Description of the Issue

Given the limitations on the resources available to implement the NPDES program (see figure 4), there is an increased need to engage in meaningful planning to set priorities and utilize resources efficiently. With an increasing workload, resources are often drawn from base program activities that, in the longterm, are critical to this program's success (for more on this topic see Strategic Issue 2). This strategic plan is a first step toward managing available resources, and setting and communicating priorities to both internal and external stakeholders.

Training of EPA and state employees is essential to ensuring that the NPDES program is implemented consistently and effectively. EPA also provides some training to stakeholders on a variety of issues and programs, providing them with important regulatory and policy information and facilitating compliance with environmental requirements.

Finally, EPA must address a variety of administrative and management issues related to the operation of our programs, including recordkeeping, management and support systems, and rulemaking procedures. EPA is working on a number of fronts to utilize new information management technology to streamline some of these processes and to improve quality control where appropriate.

Strategic Goal: Institutionalize a strategic planning process for the NPDES program, address the training needs of both internal and external stakeholders, and improve our administrative systems and procedures.

Achievement of this goal will be crucial to the successful implementation of the NPDES program over the longterm. EPA will need to find efficient solutions to these issues and to implement them consistently over time.

Key Actions:

By October 2001, establish a permanent process for strategic planning for the NPDES program.

By October 2001, establish a training program and schedule for internal and external stakeholders.

By October 2001, refine management and administrative systems and distribute guidelines for managers and staff.

CONCLUSIONS

The NPDES program is a cornerstone of the Clean Water Act. This program is directly responsible for preventing the discharge of billions of pounds of pollutants to the nation's rivers, lakes and coastal waters each year. We hope this strategic plan helps to demonstrate some of the important accomplishments of this successful program.

This Strategic Plan also describes the context in which the NPDES program currently operates and

frames the issues that we believe will influence our future activities. We are committed to working with our state partners and other stakeholders to further refine this Plan and the programs that it represents to achieve the goal of clean and safe water.

More information is available at www.epa.gov/npdes. Readers may provide comments and suggestions to the address on the Contents page.



