



**U.S. Environmental Protection Agency
Region 10
Office of Water and Watersheds**

**NPDES Permits Unit
2013-2015 Strategic Plan**

April 8, 2013

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I. Introduction

The National Pollutant Discharge Elimination System (NPDES) Permits Unit (NPU), henceforth referred to as “the Unit”, developed the 2013-2015 Strategic Plan (“the Unit Plan”) to identify work priorities and establish goals for the three calendar years. The Unit consists of approximately 20 staff members within the Office of Water and Watersheds (OWW) in the Environmental Protection Agency (EPA) Region 10 office. The Unit’s primary objective is to administer the Clean Water Act (CWA) and EPA regulations with respect to NPDES programs in the Region 10 states: Alaska, Idaho, Oregon and Washington.

This Unit Plan establishes goals and objectives to achieve the Unit’s primary objectives to improve and protect water quality. Priorities at all levels of the EPA were considered during the Unit Plan development, including priorities for OWW, Region 10, and the national Office of Water (OW). Also considered were the Unit’s core work functions and responsibilities, and important new initiatives. Planning encompassed the broad nature of the NPDES permitting program. Individual and general permits cover diverse dischargers, including treated wastewater from publicly owned treatment works (POTWs) and industries, and stormwater from municipal systems, construction sites and industrial facilities. The Unit’s work intersects with other programs within OWW, such as the Watershed Unit and the Water Quality Standards Unit, as well as other programs and offices within Region 10. The Unit Plan presents the work planned or anticipated over a three-year period within the Unit’s areas of responsibility, as shown in Figure 1.

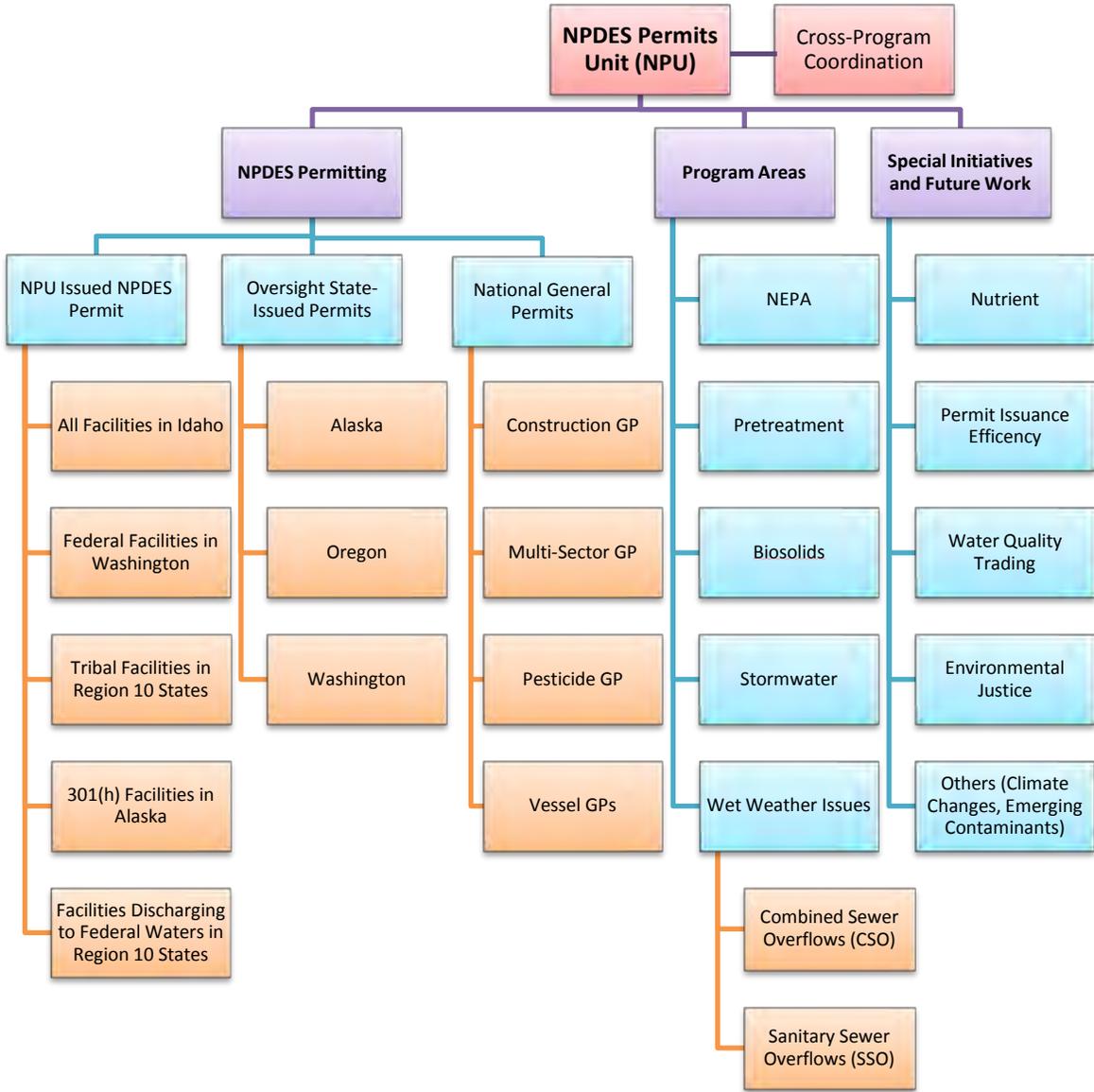
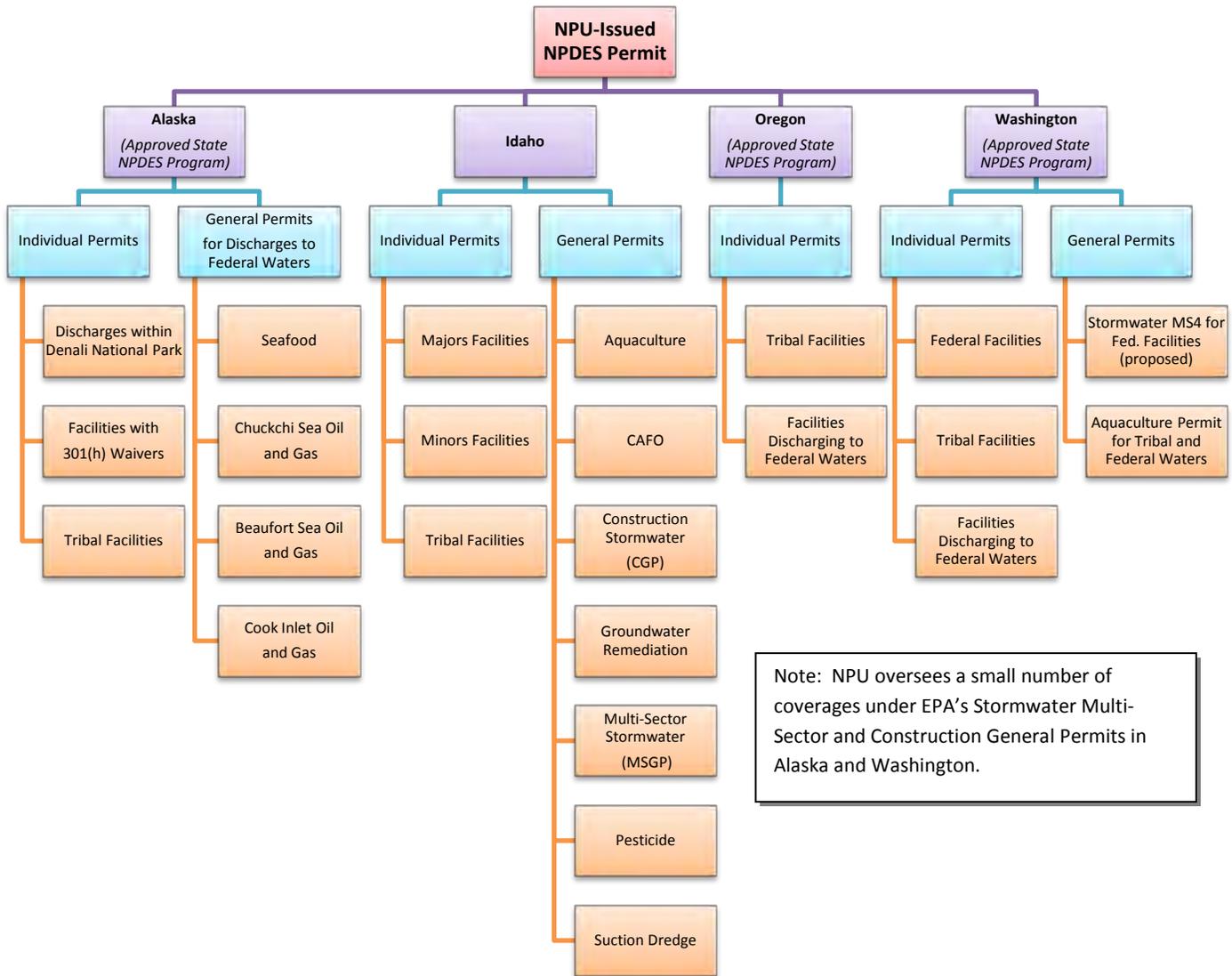


Figure 1. Areas of Responsibility for the NPDES Permits Unit

II. NPDES Permit Implementation

The Unit is responsible for the direct implementation of a large number of NPDES permits throughout the region, particularly in Idaho where all NPDES authority remains with the EPA. Figure 2, identifies the Unit’s permit issuance responsibility throughout the region.



Note: NPU oversees a small number of coverages under EPA’s Stormwater Multi-Sector and Construction General Permits in Alaska and Washington.

Figure 2. Region 10 Direct Implementation NPDES Permits

A major priority for the Unit is to increase the permit issuance rate. The Unit’s goal is to achieve a minimum permit issuance and coverage level of 65 percent of facilities under the EPA authority by the end 2015. As of January 1, 2013, the universe of facilities that fall within EPA’s permitting authority was 484, which include facilities under individual and general permits. Due to data management limitations in the Integrated Compliance Information System (ICIS) database, facilities covered under the pesticide and stormwater general permits are not included

in the facilities count at this time. Of the 484 facilities, 52 facilities have submitted applications to EPA, but are not yet permitted, 261 facilities have expired permits, 135 facilities have permits that will expire during the planning period, and 36 facilities have permits that will be effective beyond 2015.

Permit issuance will be prioritized based on the following areas of importance for the region.

- Idaho Conservation League Settlement
- Implement approved total maximum daily loads (TMDLs)
- Tribal Facilities Permits
- Stormwater
- Puget Sound
- Boise River
- Spokane River
- Discharges to Impaired Waters
- General Permits

The Unit has selected permits for issuance as shown in Appendix A, in accordance with the following tiered approach:

- Tier 1 are permits currently identified as a high priority and have been assigned to a permit writer.
- Tier 2 includes additional high priority permits based on criteria identified in this plan.
- Tier 3 permits also meet criteria in this plan but will be assigned as resources become available.

III. Oversight of Delegated States

The EPA has an important support and oversight role of states with approved NPDES programs. The Unit is responsible for the following actions to ensure state programs meet CWA and NPDES requirements. The Oversight Team Lead coordinates the oversight activities performed by NPU permit writers. The Unit interacts with delegated states on a variety of ways, including:

1. Perform real-time permit reviews during the state permit issuance process to ensure consistency and compliance with federal regulations.
2. Conduct Permit Quality Reviews (PQR), which are EPA audits of state-issued NPDES Permits.
3. Coordinate with the EPA's Office of Compliance and Enforcement (OCE) to produce State Review Framework (SRF)/PQR Integrated Reports.
4. Review and provide comments on proposed changes to NPDES-related regulations and guidance documents.
5. Provide NPDES-related technical assistance regarding state NPDES program implementation internally to other OWW units and R10 offices, and externally to stakeholders and the public.

6. Provide assistance and coordination for related CWA requirements (TMDLs, Water Quality Standards) for state-issued permits.
7. Track the EPA performance metrics to evaluate the performance of state NPDES programs.

In 2009, in response to an Office of Inspector General report, the EPA issued the Clean Water Act Action Plan¹ committing the agency to establish clear expectations and accountability for state- and EPA-implemented programs. The NPDES Integrated Oversight process was initiated in 2010. The primary goal of integrated oversight reviews is to provide a periodic and standardized process to evaluate the NPDES permitting and compliance programs.

Under the Action Plan, the EPA Regions must work with their state partners to identify water quality priorities to guide the investment of limited resources. The Unit and OCE have been working with states to develop joint annual integrated CWA NPDES work plans². These plans incorporate permitting and enforcement program elements, identify and discuss national, regional and state priorities, consider the enforceability of existing permits, and address performance expectations.

Furthermore, the responsibility for conducting Permit Quality Reviews (PQR)³ was transferred from headquarters to the Regions in 2012. The PQRs are to be coordinated with the SRF process to facilitate improved integration and consistency of NPDES permitting and enforcement program reviews. As such, the Unit and the NPDES Compliance Unit (NCU) will integrate oversight reviews of state permitting and enforcement programs.

A. Alaska Oversight Plan

The EPA authorized the Alaska Department of Environmental Conservation (ADEC) to administer the NPDES Program in 2008, as the Alaska Pollutant Discharge Elimination System (APDES) program, under a phased approach. The final phase transitioned to ADEC on October 31, 2012.

At the time of program transfer in 2008, the EPA committed to providing real-time reviews of all major, minor, municipal, and industrial individual APDES permits, as well as sector-specific and stormwater general APDES permits to ensure consistency with federal regulations, state regulations and ADEC permit guidance. Under the enhanced review process, ADEC identifies issues early in the permit drafting phase and provides a list of issues and proposed resolutions to the Unit for review, consideration, and discussion, if necessary. Once the issues are resolved to the satisfaction of both agencies, ADEC will proceed with permit development. The opportunity

¹ *Clean Water Act Action Plan*, U.S. EPA, October 2009.

(<http://www.epa.gov/enforcement/water/documents/policies/actionplan101409.pdf>)

More detailed information available at <http://www.epa.gov/oecaerth/civil/cwa/cwaenfplan.html>.

² Giles, Cynthia, *Interim Guidance to Strengthen Performance in the NPDES Program*, U.S. EPA, Office of Enforcement and Compliance Assurance Memorandum, June 22, 2010.

(<http://www.epa.gov/oecaerth/resources/policies/civil/cwa/interim-guid-npdes-062210.pdf>).

³ More information available at <http://cfpub1.epa.gov/npdes/pqr.cfm>.

for the Unit to review the preliminary draft permit occurs during the 10-day applicant review and comment phase. All draft permits may be reviewed again during the public comment period.

The Unit and APDES permits program intend to scale back the use of enhanced permit reviews and modify the current permit review protocol in 2013. The enhanced permit reviews will continue for a minimum of six months beyond the final phase transfer, or April 30, 2013. Review of all draft permits will continue through 2013. The Unit plans to reduce the level of oversight after 2013 to a level consistent with other approved states in the region, however, certain permits may receive a higher level of coordination and review, to be determined on a case-by-case basis. Under a standard level of oversight, the Oversight Team Lead or other Unit staff will screen draft permits available for public review biweekly, with the goal of reviewing an average of one draft permit per month during the comment period.

ADEC has worked toward building capacity and competency by issuing a variety of NPDES permits since initial delegation. The Unit will work with ADEC to identify and provide appropriate capacity building and training opportunities as needed.

Alaska-Specific Objectives

- Complete the PQR and Memorandum of Agreement (MOA) review, in conjunction with the SRF, for Alaska in FY13 (October 1, 2012 through September 30, 2013). Document the review and findings in the Integrated Report.
- Continue to provide feedback during ADEC's early issues identification and resolution process.
- Review each draft permit through 2013 and then reduce the level of oversight consistent with other approved states.
- Provide capacity building, training and technical support as needed.
- Closely coordinate with ADEC on general permits that provide coverage in adjacent federal and state waters (e.g., Cook Inlet Oil and Gas, Arctic Oil and Gas, Seafood, etc.)
- Provide technical assistance to communities on the implementation of voluntary Integrated Planning to fulfill CWA-NPDES obligations.

B. Oregon Oversight Plan

The Unit will provide real-time reviews of a mix of major, minor, municipal, and industrial individual NPDES permits, as well as, sector-specific, stormwater and general NPDES permits to ensure consistency with federal regulations, state regulations and Oregon Department of Environmental Quality (ODEQ) guidance documents, called Internal Management Directives (IMDs)⁴. The Unit will screen permits available for public comment on a biweekly basis. EPA will select permits for review from those available for public comment with the goal of reviewing one permit per month on average and providing comments during the public comment period.

⁴ Oregon Department of Environmental Quality, Internal Management Directives available at <http://www.deq.state.or.us/pubs/reports.htm#WQ>.

Oregon-Specific Objectives

- Continue to work toward meeting EPA’s obligations under the Compliance Schedule Settlement Agreement with Northwest Environmental Advocates (NWEA). Under the agreement, the Unit must review five preliminary draft permits that contain compliance schedules, and work with the National Marine Fisheries Service (NMFS), and U.S. Fish and Wildlife Service (USFWS), collectively “the Services” and consider their concerns.

The settlement agreement required review of the first five permits within one year of the issuance of ODEQ’s Compliance Schedule IMD (issue date June 21, 2010). Additionally, the Unit must review five more permits that contain compliance schedules to ensure appropriate implementation of compliance schedules in NPDES permits within two years after issuance of the IMD. Completion of reviews has been delayed by a lack of draft permits that contain compliance schedules.
- Complete the PQR and MOA review for Oregon in FY15-FY16 (October 1, 2014 through September 30, 2016). Coordinate a joint SRF review with NCU and complete the Integrated Report by the end of FY16.
- Review proposed changes to ODEQ’s NDPEs-related policies and guidance documents (IMDs), and provide technical assistance as needed.
- Provide technical assistance to communities on the voluntary implementation of Integrated Planning approach to fulfill CWA-NPDES obligations.

C. Washington Oversight Plan

The Unit will provide real-time reviews of a mix of major, minor, municipal, and industrial NPDES individual permits, and sector-specific, stormwater and general permits to ensure consistency with federal regulations, state regulations and the Washington Department of Ecology (Ecology) permitting guidance. The Unit will screen permits available for public comment on a biweekly basis. Permits for review will be selected from permits available for public comment with the goal of reviewing an average of one permit per month and providing comments to Ecology during the public comment period.

Washington-Specific Objectives

- Complete the Region 10’s first integrated SRF/PQR review report in coordination with NCU staff. When Headquarters transferred the program review to the regions in 2010, it designated FY12 as a “transition year.” In other words, the findings from the 2009 PQR review were used as the basis for discussion in the Integrated Report. Review the MOA for consistency with EPA’s checklist.
- Complete the PQR and MOA review for Washington in FY15-FY16. Coordinate a joint SRF review with NCU and complete the Integrated Report by the end of FY16.
- Participate in Ecology’s Permit Writer’s Workgroup to stay abreast of Ecology’s current permitting practices.
- Coordinate with NMFS on the Endangered Species Act (ESA) consultation for the Columbia Generating Station NPDES permit and other related projects that may arise.

- Provide technical assistance to communities on the implementation of voluntary Integrated Planning to fulfill CWA-NPDES obligations.

IV. Partnerships

A. Tribal Governments

To ensure consistency with EPA's Indian Policy of 1984, Executive Orders 13175 and 12898 and EPA Region 10's Tribal Consultation Procedures, the Unit will consult with Tribes on a government-to-government basis throughout the decision-making process. This consultation is separate from the public comment process.

There are 271 federally recognized tribes within the Region. The Unit recognizes the important role and interest of the tribes in water quality protection within their reservation and in treaty-protected usual and accustomed fishing areas. On a case-by-case basis, the Unit may develop a tribal consultation plan for major permit actions. We will coordinate with the Region 10 Tribal Trust and Assistance Unit and the appropriate tribal representatives to ensure the plans meet the needs of the agency and the tribes.

Objectives

- Provide tribal governments the opportunity to consult and review preliminary draft permits for actions of interest to tribes where EPA is the permitting authority.
- Engage with tribal governments on state-issued permits, as requested.
- Work with tribal governments to resolve NPDES-related issues (program applicability, application process, pretreatment) as needed.
- Share the Unit Plan and permit issuance schedules with tribal governments.
- Implement the North Slope Communications Protocol in outreach and coordination with tribal governments when working on NPDES actions on the North Slope of Alaska or in the Arctic Ocean.

B. Other Federal Agencies

Section 7 of ESA requires every federal agency consult with the Services to ensure any action it authorizes is not likely to jeopardize the continued existence of any species listed under the ESA, or result in the destruction or adverse modification of critical habitat required by a listed species. Additionally, the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) requires federal agencies to consult with NMFS on all actions, proposed actions, authorized, funded, or undertaken by the agency that might adversely affect Essential Fish Habitat (EFH).

Federal actions include the issuance of NPDES permits. ESA and EFH consultation require development of a Biological Evaluation (BE) and EFH assessment to assist the agencies with consultation with the Services. Consultation activities must be completed prior to issuance of permits. The EPA is committed to working with our federal partners to protect species identified as threatened or endangered, and their critical habitat areas designed under ESA.

Consultations on EPA's permitting actions can be lengthy, time-consuming, and resource intensive. The Unit will coordinate the permit timelines and early issue identification with the Services to streamline and expedite the ESA process where feasible while continuing to ensure all NPDES permits issued are protective.

V. NPDES Core Sub-Programs

A. NEPA Compliance

The EPA actions are subject to National Environmental Policy Act (NEPA) (42 U.S.C. §4321 *et seq.*), the Council on Environmental Quality (CEQ) NEPA regulations (40 CFR 1500-1508), and the EPA's regulations for implementing the procedural provisions of NEPA (40 CFR Part 6) including:

- The award of wastewater treatment construction grants under Title II of the CWA.
- The issuance of "new source" NPDES permits under section 402 of the CWA.
- Certain research and development projects.
- EPA actions involving renovations or new construction of facilities.
- Certain grants awarded for projects authorized by Congress through the Agency's annual Appropriations Act (i.e., Special Appropriations Act grant projects).

The EPA assumes the role of lead agency in the NEPA process for "new source" NPDES permit actions that apply to discharges on private, state, and tribal lands, and where there is no other federal agency with a permitting action. NEPA reviews for projects occurring on federal land are typically led by the responsible land management agency, with EPA acting as a cooperating agency. EPA is the lead agency responsible for NEPA compliance for Special Appropriations Act grant projects.

During the 2013-2015 period, NEPA compliance activities in Region 10 may include reviews of Special Appropriations Act drinking and wastewater projects, as well as, "new source" NPDES permits for aquaculture facilities, dairy operations, seafood processing, and oil and gas development. The majority of NEPA compliance activities for "new source" NPDES permit actions will occur in Idaho, with some potential for oil and gas development in the federal waters of Cook Inlet and the Arctic outer continental shelf.

Region 10 currently commits 1 FTE to the NEPA compliance program. This FTE is located in the Unit, although, as noted above some of the work is outside the scope of the NPDES program.

Goals

- To disclose fully to the public, affected tribes, and other interested parties the potential environmental impacts of proposed EPA actions.

- To fully integrate the NEPA process with the NPDES process, such as joint tribal and ESA consultations, public noticing of draft documents, public meetings and hearings.
- To work closely with our state and federal partners, grantees, applicants, and tribal governments to minimize duplications of efforts and coordinate information needs for respective agency actions.

Objectives

- Ensure the NEPA compliance program addresses significant environmental issues and reasonable alternatives, and fully integrates the NEPA review into the NPDES permits and Special Appropriation Act project decision-making processes.
- Provide support and technical assistance to EPA staff and identify new opportunities to streamline the NEPA compliance process.
- Ensure full public participation and maintain positive working relationships with our state and federal partners, grantees, applicants, and tribal governments for NEPA compliance activities.

B. Pretreatment Program

The 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.

The Region 10 pretreatment program directly oversees the implementation of 14 approved municipal pretreatment programs in Idaho. Additional programs may be approved for other cities during this plan cycle, including the cities of Post Falls and Jerome, Idaho. The Region also directly oversees categorical industrial users (CIUs) discharging to POTWs without approved pretreatment programs to assure that CIUs comply with the federal pretreatment standards. Region 10 oversees the states’ implementation of the approved programs in Oregon, with 24 approved cities, Washington, with 10 approved cities, and Alaska, with two approved cities.

The Region is fulfilling the national goal of conducting audits and pretreatment compliance inspections on approximately 20% of the approved municipal pretreatment programs annually.

The Unit currently commits 0.9 FTE to the pretreatment program.

Goal

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

Objectives

- Serve as the oversight authority for cities with approved pretreatment programs in delegated states.
- Disseminate information and provide technical support to states and municipalities regarding implementation of the pretreatment streamlining rule.
- Provide guidance and targeted oversight, such as accompanying state inspectors on audits and compliance inspections, to the approved pretreatment programs in Alaska, Oregon, and Washington.
- Seek opportunities to improve elements of the pretreatment program.
- Provide technical assistance and training to EPA, state and city pretreatment staff.
- Locate categorical industrial users discharging to non-pretreatment cities in Idaho and oversee their compliance with applicable pretreatment regulations.
- Meet national targets for conducting audits and inspections where EPA directly implements the program, and lead compliance and enforcement actions as appropriate.

C. Biosolids

The biosolids program will focus on providing compliance assistance to states, tribes, public and the regulated community upon request.

EPA Region 10 currently commits 0.1 FTE to the biosolids program. This low level of effort reflects a recent regional decision to disinvest this program in order to maintain our role in other work in the Unit. This disinvestment is possible because the biosolids regulations, in section 503 of the CWA, are self-implementing, thus biosolids permits are not required.

Goal

- Maintain a biosolids presence in Region 10 to assist stakeholders as needed. Assist with the delegation of biosolids program to states and tribes where possible.

Objectives

- Work internally with staff on biosolids issues that may arise during permit issuance.
- Provide limited compliance assistance to stakeholders.

D. Stormwater

Federal regulations specify that the following categories of stormwater discharges are point source discharges that require authorization to discharge under NPDES permits:

- Industrial activities covering 29 sectors,
- Construction activities disturbing one or more acres, and

- Municipal separate storm sewer systems (MS4s) located in Urbanized Areas as defined by the latest Decennial Census.

Figure 3 illustrates the universe of NPDES stormwater permittees within the four Region 10 States as of December 2011. Approximately 6,509 construction site operators, 3,946 industrial operators, and more than 227 municipal separate storm sewer system (MS4) operators are currently authorized to discharge stormwater in compliance with applicable general or individual NPDES permits.

The EPA and state NPDES stormwater permit programs provide significant compliance assistance to a large number of diverse regulated entities. Compliance assistance focuses on applicable requirements, permit conditions and available best management practices (BMPs) to manage stormwater. The EPA Region 10 continues to offer compliance assistance regarding its stormwater permits through a regional website, consultation by phone, email responses, and in-person presentations and workshops as resources allow.

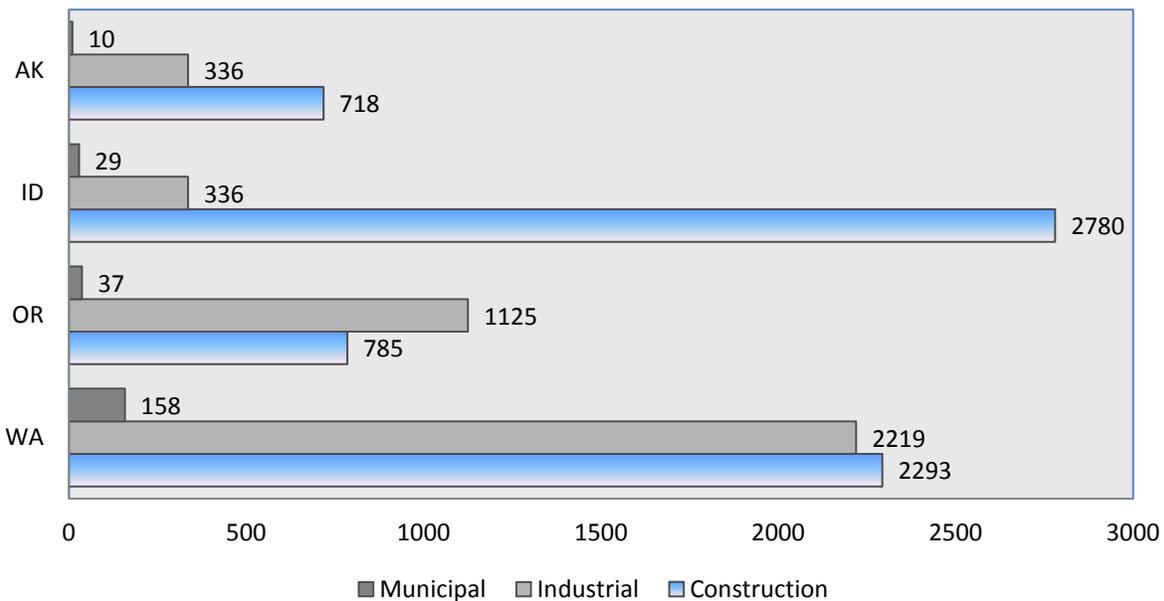


Figure 3. Number of Stormwater Permittees in Region 10 States

Significant outreach is required to educate and engage stakeholders during development of stormwater permits. The EPA and states must actively engage the regulated community, the public and other stakeholders. Outreach efforts include government-to-government consultation with tribes, consultations with the Services related to ESA, opportunities for stakeholder involvement, and discussions with water program staff in Idaho, Alaska, Oregon, Washington and tribal governments on all stormwater permit actions.

The Unit currently commits 2.0 FTE to carry out direct permit implementation and to oversee state implementation of the NPDES stormwater programs.

Goal

- Ensure current and effective NPDES stormwater discharge permits are available to authorize regulated stormwater discharges within Idaho, Alaska, Washington, and Oregon.

Objectives

- Issue individual permits to all regulated MS4s in Idaho, Indian Country, and for federal facilities in Washington (potential for general permit development in WA).
- Reissue expired MS4 permits in a timely manner.
- Review and comment on draft MS4 permits as necessary/appropriate, in Alaska, Oregon, and Washington.
- Continue appropriate compliance assistance activities regarding EPA's recently reissued Construction General Permit in Idaho, Indian Country, and for federal facilities in Washington.
- Work with EPA Headquarters to reissue the Multi-Sector General Permit (MSGP) for stormwater from industrial activities in Idaho, Indian Country, and for federal facilities in Washington.
- Work with IDEQ to determine the stormwater monitoring requirements under the MSGP for discharges to impaired waters with TMDLs. Notify permittees to impaired waters (both with and without TMDLs) of monitoring requirements. Work with IDEQ to manage reporting.
- Review and comment on draft industrial and construction stormwater permits as necessary/appropriate, in Alaska, Oregon, and Washington.
- Continue appropriate compliance assistance activities regarding EPA's MSGP in Idaho, Indian Country, and for federal operators in Washington.

E. Wet Weather Discharges

"Wet weather discharges" collectively refer to point source discharges that result from precipitation events, such as rainfall and snowmelt. Wet weather discharges include combined sewer overflows (CSOs), wet weather sanitary sewer overflows (SSOs) and NPDES regulated stormwater discharges.

Sanitary Sewer Overflows

Properly designed, operated, and maintained sanitary sewer systems collect and transport all of the wastewater that flows into the sewer system to the POTW. SSOs are the result of occasional unintentional (and untreated) discharges from separate sanitary sewers, which can occur in almost every system. SSOs occur for a variety of reasons, including blockages, line breaks, sewer defects that allow stormwater and groundwater to overload the system, lapses in sewer system operation and maintenance, power failures, inadequate sewer design and vandalism. Most communities in EPA Region 10 states are served by separated sanitary and storm sewer systems.

Combined Sewer Overflows

Combined sewers systems are wastewater collection systems designed to carry domestic, commercial, industrial wastewater and stormwater through a single pipe system to the POTW. During wet weather, the combined volume of wastewater and stormwater can exceed the capacity of the collection system. These systems are designed so that combined flows discharge to surface waters in order to prevent sewer system backups. Combined sewer systems discharge untreated or partially treated wastewater and stormwater during combined sewer overflow (CSO) events.

The EPA's national CSO Control Policy dictates the extent that communities with combined sewer systems must reduce CSOs discharges. Communities with combined sewer systems must have enforceable conditions in their NPDES permits that require the reduction of CSOs in accordance with the federal policy and any state rules that may apply. There are 15 communities with combined sewer systems in Region 10, three in Oregon, eleven in Washington, and one in Alaska.

EPA Region 10 commits minimal staff resources as needed to oversee implementation of the CSO/SSO requirements in the Region.

Goal

- The EPA continues to support states and local communities to reduce the occurrence of CSOs and SSOs in Region 10.

Objectives

- Ensure that state and EPA issued NPDES permits contain appropriate permit requirements including language that requires permittees to provide public health notification of SSO and CSO events.
- Develop standard rationale for permit fact sheets to highlight the importance of existing NPDES reporting requirements related to SSOs.
- Continue to coordinate with EPA Headquarters as additional guidance is developed for CSOs, SSOs, sanitary sewer collection systems and combined sewer systems.
- Continue to work with the states and communities as they update and implement their CSO Long Term Control Plans (LTCP).
- Provide assistance to states on CSO/SSO questions and concerns.

VI. Region 10 Cross-Program Coordination

The Unit must continue to work closely with other units and offices in Region 10 to accomplish our work. Permit limits are calculated based on criteria in water quality standards (WQS) or may be based on waste load allocations (WLA) as required by TMDLs. Region 10 Office of Regional Counsel (ORC) assists permit writers with legal concerns and vulnerabilities, and the NCU ensures that facilities comply with their permits. Efforts are underway to promote ongoing

cross-program coordination. Unit staff will pursue the following actions to enhance cross-program coordination.

- Permit writers will communicate and collaborate with their counterparts in the Watershed, Water Quality Standards, and NPDES Compliance Units during the permit development process.
- Permit staff will review state and tribal WQS and TMDL draft documents as needed to ensure they meet NPDES objectives. In some cases, the Unit is part of the ongoing review team for a state/tribal submittal.
- The Unit will continue to work with the Watershed Unit to ensure that the expression of WLAs in TMDLs allows incorporation of the WLAs in permits.
- The stormwater team will work with the Superfund program to propose NPDES permits options for both EPA and state permit actions that will prevent the re-contamination of cleanup sites.
- Permit writers and the team leads will coordinate the review of the fact sheet, draft and final permits, and the response to comments document with ORC as needed.

In addition to these unit activities, OWW management has recently instituted a regular management meeting to discuss coordination among the OWW units. The management team encourages work sharing, temporary details, cross program training, new employee orientation, and involvement in units' planning meetings as actions to enhance coordination.

VII. Special Initiatives and Future Challenges

The Unit will invest resources and attention to address a variety of issues that we currently face or will be confronting in the near future. Early engagement in emerging issues will allow the Unit and the OWW to increase permit consistency, productivity, efficiency and effectiveness. Proactively addressing emerging issues will allow the Unit to meet future permit issuance and oversight targets.

A. Nutrient Initiative

Nutrient pollution is one of the leading causes of water quality impairments. Significant sources of nutrient pollution include urban stormwater, municipal wastewater, livestock production activities, and agricultural crop production. The EPA has nationwide efforts to reduce nitrogen and phosphorus pollution.

The Unit has issued a number of permits with nutrient limitations consistent with approved TMDLs. The Unit has also issued a limited number of permits with nutrient limits for receiving waters for which an EPA-approved TMDL has not been completed. The Unit has drafted consistency procedures to assist permit writers in assessing the need for and establishing nutrient limits in permits where TMDLs have not been established. The consistency procedures focus on point sources that are a significant contributor to the nutrient impairment and ensure that nutrient limits established through a permit-specific analysis will result in environmental benefits.

Goals

- Develop effluent and ambient monitoring requirements to include in EPA-issued NPDES permits.
- Coordinate with the Watershed Unit to ensure that WLAs can be consistently implemented in NPDES permits.
- Maintain involvement with Headquarters on national nutrient permitting tools.

The Nutrient Initiative will focus on enhancing the Unit's existing policy to address a broader set of circumstances, continuing our permit issuance progress in areas where we have direct implementation, and working with states with approved NPDES programs in making progress toward reducing nutrient pollution. The Unit will remain engaged with Headquarters' work on nutrient permitting.

B. Water Quality Trading

There is growing interest among states, local government and industry in utilizing water quality trading as an innovative approach for achieving WQS. WQS revisions and TMDLs are trending toward criteria that are more restrictive and WLAs resulting in more stringent permit conditions. Water quality trading is viewed as a potentially economical and efficient means of achieving discharge limits and water quality objectives. The region is developing a water quality trading team to work on a framework for trading throughout the Region 10 states. The Unit will be represented on the team to evaluate water quality trading projects in the context of NPDES permits.

- Unit members will participate in the regional workgroup.
- The Unit will provide input into the development of the framework.
- As appropriate, the Unit will utilize the framework in the development water quality trading in EPA-issued permits.

C. Permit Efficiency Initiative

This initiative represents a focus on improving the tools and processes available to the Unit to improve the effectiveness of the Unit's resources and reduce transaction costs. The Unit must identify more efficient work practices in order to meet its obligations.

The Unit is committed to the goal of continuing to increase efficiency while ensuring the consistency, quality, and defensibility of NPDES permits issued by Region 10. The 2010 reorganization of the Unit established, in addition to an Oversight Team Lead, a Permit Team Lead position to ensure consistency and improve permit writing tools and processes. The Permit Team Lead is responsible for carrying out the permit efficiency goal.

Some of the efforts planned and underway include developing and documenting Standard Operating Procedures (SOPs), permit writing consistency procedures, permit document models and templates, and permit writing tools. The Permit Team Lead is responsible for coordinating

these efforts, tracking the progress and schedule, and ensuring completion of the tools and processes. Individuals and teams will assist in the development of these tools and procedures. Additionally, the Unit will evaluate efficiencies for the municipal sector in Idaho, the largest single category of permits, in order to meet unit backlog targets.

To increase efficiency, the Unit will:

- Review current permitting practices and procedures.
- Identify areas for improved efficiencies.
- Develop procedures as needed.
- EPA permit writers are encouraged to contact IDEQ TMDL writers and 401 certification staff early in the permit development process. This communication will enhance the pre-draft permit development and review.

D. Environmental Justice

Expanding the conversation about our environment and ensuring all citizens are equally protected are one of EPA's top priorities. In 2011, EPA released Plan EJ 2014⁵ describing the agency's road map to integrating environmental justice into its programs, policies, and activities. The goals of the plan are to: (1) enhance the ability of overburdened communities to participate fully and meaningfully in the permitting process; and (2) take steps to meaningfully address environmental justice issues to the greatest extent practicable under existing environmental laws.

The Unit is participating in national and regional discussions regarding actions to enhance public involvement in permitting decisions and best practices for applicants seeking permits from EPA. The Unit will:

- Implement permit screening tools to advance our awareness of permits in EJ communities, where EPA is the permitting authority.
- Incorporate enhanced public participation activities into the permitting process, as necessary.

E. Others

Climate change and emerging contaminants, such as pharmaceuticals and personal care products, are two initiatives underway nationally. Both may affect the NPDES permitting programs in the future. The Unit will track these initiatives, share information with stakeholders, and incorporate into future planning and permits as appropriate. In the near term EPA permit writers may consider how climate change and emerging contaminants can be addressed in permits based on available data and site specific information.

⁵ More information available at <http://www.epa.gov/environmentaljustice/plan-ej/>

Appendix A: EPA-Issued Permits

Sorted by (1) State, (2) Tier, (3) Facility Name

State	NPDES ID	Permittee	Facility Name	Tribal	Permit Status	Effective Date	Expiration Date	Tier
Alaska	AK0022551	ANCHORAGE, MUNICIPALITY OF	ANCHORAGE, MUNICIPALITY OF - JOHN M. ASPLUND WPCF		ADC	8/2/2000	8/2/2005	1
Alaska	AK0028525	METLAKATLA INDIAN COMMUNITY	METLAKATLA INDIAN COMMUNITY - TAMGAS CREEK SALMON HATCHERY	T	PND			1
Alaska	AK0046876	METLAKATLA INDIAN COMMUNITY	METLAKATLA WATER TREATMENT		PND			2
Alaska	AK0043532	PELICAN, CITY OF	PELICAN, CITY OF		ADC	10/28/1985	10/28/1990	2
Alaska	AK0025402	WHITTIER, CITY OF	WHITTIER, CITY OF		ADC	12/28/1983	12/27/1988	2
Alaska	AKG520067	ANNETTE ISLAND PACKING COMPANY	ANNETTE ISLAND PACKING COMPANY		ADC	6/27/2002	7/27/2006	3
Alaska	AK0021440	KETCHIKAN, CITY OF	KETCHIKAN, CITY OF		ADC	1/29/2001	1/29/2006	3
Alaska	AKG571014	METLAKATLA INDIAN COMMUNITY	METLAKATLA INDIAN COMMUNITY - WASTEWATER TREATMENT PLANT	T	EXP	6/23/2004	7/21/2009	3
Idaho	ID0020753	AMERICAN FALLS, CITY OF	AMERICAN FALLS, CITY OF		ADC	1/7/2002	1/8/2007	1
Idaho	IDG130000	25 coverages	Aquaculture GP		EXP		11/30/2012	1
Idaho	IDG131000	11 coverages	Aquaculture GP		EXP		11/30/2012	1
Idaho	IDG132000	4 coverages	Aquaculture GP		EXP		11/30/2012	1
Idaho	ID0023710	ASHTON, CITY OF	ASHTON, CITY OF		EXP	8/9/2001	8/9/2006	1
Idaho	ID0020044	BLACKFOOT, CITY OF - BLACKFOOT WWTP	BLACKFOOT, CITY OF		ADC	11/28/2000	11/28/2005	1
Idaho	ID0021504	CALDWELL, CITY OF	CALDWELL, CITY OF - CALDWELL WWTP		ADC	2/1/1999	2/2/2004	1
Idaho	ID-002001-0	City of Rigby	City of Rigby Wastewater Treatment Plant					1
Idaho	ID0022853	COEUR D ALENE, CITY OF	COEUR D'ALENE, CITY OF - COEUR D'ALENE WWTP		ADC	11/2/1999	11/2/2004	1
Idaho	ID0020133	EASTERN IDAHO REGIONAL WASTEWATER AUTHORITY	EASTERN IDAHO REGIONAL WASTEWATER AUTHORITY		ADC	8/1/2004	7/31/2009	1
Idaho	ID0022012	ELK CITY WATER AND SEWER ASSOCIATION	ELK CITY WATER AND SEWER ASSOCIATION		ADC	10/1/2002	9/30/2007	1
Idaho	ID0025569	FRANKLIN, CITY OF	FRANKLIN, CITY OF		ADC	6/1/2004	4/30/2009	1
Idaho	ID0023825	GRACE, CITY OF	GRACE, CITY OF		ADC	2/1/2004	1/31/2009	1
Idaho	ID0026590	HAYDEN AREA REGIONAL SEWER BOARD	HAYDEN AREA REGIONAL SEWER BOARD		ADC	11/2/1999	11/2/2004	1

State	NPDES ID	Permittee	Facility Name	Tribal	Permit Status	Effective Date	Expiration Date	Tier
Idaho	ID0026468	HECLA MINING CO	HECLA MINING COMPANY - GROUSE CREEK UNIT		ADC	4/28/2002	1/29/2007	1
Idaho	ID0020427	HOMEDALE, CITY OF	HOMEDALE, CITY OF - HOMEDALE WWTP		ADC	5/1/2004	4/30/2009	1
Idaho	ID0021202	MARSING, CITY OF	MARSING, CITY OF (WWTP)		ADC	5/1/2004	4/30/2009	1
Idaho	ID0020192	MERIDIAN, CITY OF	MERIDIAN, CITY OF - MERIDIAN WWTP		ADC	11/2/1999	11/2/2004	1
Idaho	ID0022063	NAMPA, CITY OF	NAMPA, CITY OF - NAMPA WWTP		ADC	2/1/1999	2/2/2004	1
Idaho	ID0023159	NEW MEADOWS, CITY OF	NEW MEADOWS, CITY OF - NEW MEADOWS WWTP		ADC	5/1/2004	4/30/2009	1
Idaho	ID0021016	NOTUS, CITY OF	NOTUS, CITY OF - NOTUS WWTP		EXP	11/2/1999	11/2/2004	1
Idaho	ID0021776	PARMA, CITY OF	PARMA, CITY OF		ADC	5/1/2004	4/30/2009	1
Idaho	ID0020672	PAYETTE, CITY OF	PAYETTE, CITY OF		ADC	12/31/2001	1/2/2007	1
Idaho	IDS028053	POCATELLO, CITY OF (MS4) PLUS CHUBBUCK, BANNOCK COUNTY & ITD #5	POCATELLO, CITY OF (MS4) PLUS CHUBBUCK, BANNOCK COUNTY & ITD #5		ADC	12/15/2006	12/14/2011	1
Idaho	ID0025852	POST FALLS, CITY OF	POST FALLS, CITY OF		ADC	11/2/1999	11/2/2004	1
Idaho	ID0020842	SANDPOINT, CITY OF	SANDPOINT, CITY OF - SANDPOINT WWTP		ADC	1/5/2002	1/5/2007	1
Idaho	ID0020117	SMELTERVILLE, CITY OF	SMELTERVILLE, CITY OF - WASTEWATER TREATMENT PLANT		ADC	8/1/2004	8/1/2009	1
Idaho	ID0028037	SORRENTO LACTALIS INC	SORRENTO LACTALIS INC		ADC	11/1/2005	10/31/2010	1
Idaho	ID0021296	SOUTH FORK COEUR D ALENE RIVER SEWER DISTRICT	SOUTH FORK COEUR D ALENE RIVER SEWER DISTRICT		ADC	8/1/2004	8/1/2009	1
Idaho	ID0021300	SOUTH FORK COEUR D ALENE RIVER SEWER DISTRICT	SOUTH FORK COEUR D'ALENE RIVER SEWER DISTRICT		ADC	8/1/2004	8/1/2009	1
Idaho	ID0023591	STAR WATER AND SEWER DISTRICT	STAR WATER AND SEWER DISTRICT - STAR WWTP		EXP	11/2/1999	11/2/2004	1
Idaho	ID0022713	WORLEY, CITY OF	WORLEY, CITY OF	T	ADC	12/1/2003	12/1/2008	1
Idaho	IDG910000	Groundwater Remediation Facilities General Permit			ADC	7/1/07	6/30/12	1
Idaho	ID0020176	ABERDEEN, CITY OF	ABERDEEN, CITY OF - ABERDEEN WWTP		ADC	9/26/2001	9/26/2006	2
Idaho	ID0027995	CABINET GORGE POWER STATION	AVISTA CORPORATION - CABINET GORGE POWER STATION		ADC	1/5/2002	1/5/2007	2
Idaho	ID0023167	CASCADE, CITY OF	CASCADE, CITY OF (WWTP)		ADC	1/1/2004	1/1/2009	2

State	NPDES ID	Permittee	Facility Name	Tribal	Permit Status	Effective Date	Expiration Date	Tier
Idaho	ID0001163	CLEARWATER PAPER CORPORATION	CLEARWATER PAPER CORPORATION		ADC	5/1/2005	4/30/2010	2
Idaho	IDS028070	IDAHO FALLS, CITY OF (MS4) & IDAHO TRANSPORTATION DEPARTMENT DISTRICT #6	IDAHO FALLS, CITY OF (MS4)		ADC	5/1/2007	4/30/2012	2
Idaho	ID0027171	IDAHO HOT SPRINGS FOUNDATION	IDAHO LAVA FOUNDATION		PND			2
Idaho	ID0020907	IDAHO POWER CO	IDHAO POWER CO		ADC	6/28/1974	3/31/1979	2
Idaho	ID0020249	INKOM, CITY OF	INKOM, CITY OF - INKOM WWTF		ADC	6/1/2005	5/31/2010	2
Idaho	ID0021229	KOOTENAI-PONDERAY SEWER DISTRICT	KOOTENAI-PONDERAY SEWER DISTRICT		ADC	1/5/2002	1/5/2007	2
Idaho	ID0021822	LAVA HOT SPRINGS, CITY OF	LAVA HOT SPRINGS, CITY OF		ADC	6/1/2005	5/31/2010	2
Idaho	IDS028061	LEWISTON MS4, CITY OF	LEWISTON MS4, CITY OF		PND			2
Idaho	ID0023027	MACKAY, CITY OF	MACKAY, CITY OF - MACKAY WWTP		ADC	6/1/2004	5/31/2009	2
Idaho	ID0020231	MCCALL, CITY OF	MCCALL, CITY OF		ADC	5/1/2003	4/30/2008	2
Idaho	ID0027022	MERIDIAN BEARTRACK COMPANY	MERIDIAN BEARTRACK COMPANY - BEARTRACK MINE		ADC	12/1/2003	10/31/2008	2
Idaho	ID0021831	MIDDLETON, CITY OF	MIDDLETON, CITY OF - MIDDLETON WWTP		EXP	11/2/1999	11/2/2004	2
Idaho	ID0020214	PRESTON, CITY OF	PRESTON, CITY OF - PRESTON WWTP		ADC	8/1/2005	7/31/2010	2
Idaho	ID0025194	RIVERSIDE INN-RIVERSIDE HOT SP	RINGS HOTEL-THERAPEUTIC POOL		PND			2
Idaho	ID0026085	RIVERDALE RESORT	RIVERDALE RESORT		PND			2
Idaho	IDS		Stormwater					2
Idaho	ID0025101	TENSED, CITY OF	TENSED, CITY OF	T	ADC	4/1/2004	3/31/2009	2
Idaho	ID0025402	THOMPSON CREEK MINING COMPANY	THOMPSON CREEK MINING COMPANY - THOMPSON CREEK MINE		ADC	1/28/2002	1/29/2007	2
Idaho	ID0020681	DEFENSE, ARMY COE	US ARMY CORPS OF ENGINEERS - ALBENI FALLS DAM		ADC	1/5/2002	1/5/2007	2
Idaho	ID0000230	AMALGAMATED SUGAR CO LLC	AMALGAMATED SUGAR COMPANY LLC		ADC	8/19/1977	6/30/1982	3
Idaho	ID0025488	BOISE, CITY OF (geothermal)	BOISE, CITY OF		ADC	11/16/1999	11/16/2004	3
Idaho	ID0020664	CITY OF BUHL	BUHL, CITY OF - BUHL WWTP		WBE	11/1/2007	10/31/2012	3
Idaho	ID0020095	BURLEY, CITY OF	BURLEY, CITY OF - BURLEY WWTP		ADC	1/7/2002	1/8/2007	3
Idaho	ID0025453	CALDWELL HOUSING AUTHORITY	CALDWELL HOUSING AUTHORITY - FARMWAY VILLAGE WWTP		ADC	11/2/1999	11/2/2004	3

State	NPDES ID	Permittee	Facility Name	Tribal	Permit Status	Effective Date	Expiration Date	Tier
Idaho	ID0021849	COTTONWOOD, CITY OF	COTTONWOOD, CITY OF		ADC	10/1/2002	9/30/2007	3
Idaho	ID0024490	CULDESAC, CITY OF	CULDESAC, CITY OF - CULDESAC WWTP	T	ADC	11/1/2002	10/31/2007	3
Idaho	ID0024953	WESTFARM FOODS INC	DARIGOLD INC		ADC	11/2/1999	11/2/2004	3
Idaho	ID0028479	DICKINSON FROZEN FOODS INC.	DICKINSON FROZEN FOODS INC.		PND			3
Idaho	IDS028258	ID TRANSPORTATION DEPT MS4	DISTRICT 2		PND			3
Idaho	ID0027693	DOVER, CITY OF	DOVER, CITY OF		ADC	1/5/2002	1/5/2007	3
Idaho	ID0020311	EMMETT, CITY OF	EMMETT, CITY OF - EMMETT WWTP		ADC	12/31/2001	1/2/2007	3
Idaho	ID0024384	FAIRFIELD, CITY OF	FAIRFIELD, CITY OF		ADC	11/24/2003	11/24/2008	3
Idaho	ID0020061	FILER, CITY OF	FILER, CITY OF - FILER WWTP		WBE	11/1/2007	10/31/2012	3
Idaho	ID0025143	GEORGETOWN, CITY OF	GEORGETOWN, CITY OF - GEORGETOWN WWTP		PND			3
Idaho	ID0020028	GOODING, CITY OF	GOODING, CITY OF - GOODING WWTP		ADC	5/1/2000	5/1/2005	3
Idaho	ID0025941	HAGERMAN, CITY OF	HAGERMAN, CITY OF		WBE	11/1/2007	10/31/2012	3
Idaho	ID0022446	HANSEN, CITY OF	HANSEN, CITY OF		WBE	11/1/2007	10/31/2012	3
Idaho	ID0000175	HECLA MINING COMPANY	HECLA MINING COMPANY - LUCKY FRIDAY MINE AND MILL		ADC	9/14/2003	9/14/2008	3
Idaho	ID0027901	HENGGELER PACKING CO INC	HENGGELER PACKING CO., INC		PND			3
Idaho	ID0020940	HEYBURN, CITY OF	HEYBURN, CITY OF		ADC	1/7/2002	1/8/2007	3
Idaho	ID0021024	HORSESHOE BEND, CITY OF	HORSESHOE BEND, CITY OF		ADC	11/24/2003	11/24/2008	3
Idaho	ID0000388	INDEPENDENT MEAT CO	INDEPENDENT MEAT COMPANY		ADC	7/3/1978	7/3/1983	3
Idaho	ID0026964	SIMPLOT MEAT PRODUCTS LLC	J. R. SIMPLOT MEAT PRODUCTS LLC		ADC	11/2/1999	11/2/2004	3
Idaho	ID0023914	JOINT SCHOOL DISTRICT NO. 171	JOINT SCHOOL DISTRICT #171 - TIMBERLINE HIGH SCHOOL WWTP		ADC	10/1/2002	9/30/2007	3
Idaho	ID0028029	Jug Mountain Ranch	Jug Mountain Ranch			8/24/2009	7/31/2009	3
Idaho	ID0021814	KOOSKIA, CITY OF	KOOSKIA, CITY OF - KOOSKIA WWTP	T	ADC	10/1/2002	9/30/2007	3
Idaho	ID0022055	LEWISTON, CITY OF	LEWISTON, CITY OF - LEWISTON WWTP		ADC	12/31/2001	1/2/2007	3
Idaho	ID0028339	MERIDIAN SOUTH WWTP	MERIDIAN SOUTH WWTP		PND			3
Idaho	ID0020389	NEW PLYMOUTH, CITY OF	NEW PLYMOUTH, CITY OF		ADC	12/31/2001	1/2/2007	3
Idaho	ID0020397	NEZPERCE, CITY OF - NEZPERCE WWTP	NEZPERCE, CITY OF	T	ADC	4/01/2004	3/31/2009	3

State	NPDES ID	Permittee	Facility Name	Tribal	Permit Status	Effective Date	Expiration Date	Tier
Idaho	ID0025267	PAUL HOUSING AUTHORITY	PAUL HOUSING AUTHORITY		ADC	1/7/2002	1/8/2007	3
Idaho	ID0028436	PRINCETON-HAMPTON WATER & SEWER DISTRICT	PRINCETON-HAMPTON WATER AND SEWER DISTRICT - WWTP		PND			3
Idaho	ID0023817	REXBURG, CITY OF	REXBURG, CITY OF - REXBURG WWTP		EXP	9/11/2001	9/11/2006	3
Idaho	ID0027952	ROARING SPRING WATER PARK	ROARING SPRINGS WATER PARK		PND			3
Idaho	ID0022047	ROCKLAND, CITY OF	ROCKLAND, CITY OF - ROCKLAND WWTF		ADC	1/7/2002	1/8/2007	3
Idaho	ID0000213	SENECA FOODS CORP	SENECA FOODS CORPORATION		ADC	12/31/2001	1/2/2007	3
Idaho	ID0020818	SODA SPRINGS, CITY OF	SODA SPRINGS, CITY OF - SODA SPRINGS WWTP		ADC	12/21/2001	12/21/2006	3
Idaho	ID0000019	POTLATCH Land & Lumber	ST. MARIES PLANT	T	ADC	10/31/1996	10/31/2001	3
Idaho	IDS		Stormwater					3
Idaho	ID0027928	SUN VALLEY CO	SUN VALLEY COMPANY		PND			3
Idaho	ID00028495	Syringa Mobile Home Park	Syringa Mobile Home Park		PND			3
Idaho	ID0027154	UNIVERSITY OF IDAHO	UNIVERSITY OF IDAHO		ADC	4/14/1999	4/14/2004	3
Idaho	ID0020354	WEIPPE, CITY OF	WEIPPE, CITY OF		ADC	10/1/2002	9/30/2007	3
Idaho	ID0028371	Avimor			PND			3
Oregon	OR0054917	U.S. DEPARTMENT OF INTERIOR	FISH AND WILDLIFE SERVICE	T	PND			2
Oregon	OR0032638	CONFED TRIBES OF WARM SPRINGS	WARM SPRINGS WWTP(TRIBAL LAND)	T	ADC	04/10/00	04/10/05	2
Oregon	OR0034096	COW CREEK GAMING CENTER	WASTEWATER TREATMENT PLANT	T	ADC	03/15/99	03/15/04	2
Oregon	OR0024058	WARM SPRINGS FOREST PRODUCTS	(ON TRIBAL LAND)	T	EFF	12/01/08	11/30/13	3
Oregon	OR0034100	CONFED TRIBES OF WARM SPRINGS	KAH-NEE-TA RESORT WWTF	T	WBE	12/01/07	11/30/12	3
Washington	WA0026727	LUMMI TRIBAL SEWER AND WATER	DISTRICT	T	PND			1
Washington	WA0025569	NATIONAL PARK SERVICE	PARADISE WWTP		PND			1
Washington	WA0026123	TOPPENISH, CITY OF	TOPPENISH WWTP (TRIBAL LAND)	T	ADC	11/25/03	11/25/08	1
Washington	WA0026743	YAKAMA NATION LEGENDS CASINO	WASTE WATER TREATMENT PLANT		PND			1
Washington	WA0037168	PUYALLUP, CITY OF	WATER POLLUTION CONTROL FACILI	T	ADC	08/01/03	06/24/08	1
Washington	WA0025704	WELLPINIT SANITATION & MAINTEN	ANCE WWTP	T	PND			2
Washington	WA0026697	U.S. ARMY CORPS OF ENGINEERS	BONNEVILLE LOCK AND DAM		PND			2
Washington	WA0022420	DEFENSE, ARMY COE	CHIEF JOSEPH DAM PROJECT		EXP	01/13/75	10/31/79	2

State	NPDES ID	Permittee	Facility Name	Tribal	Permit Status	Effective Date	Expiration Date	Tier
Washington	WA0001902	INTERIOR, FISH & WILDLIFE	LEAVENWORTH NATL FISH HATCHERY			01/30/75	08/31/79	2
Washington	WA0022101	DEFENSE, ARMY COE	LITTLE GOOSE DAM		EXP	12/30/74	10/31/79	2
Washington	WA0022110	DEFENSE, ARMY COE	LOWER GRANITE LOCK AND DAM		EXP	02/09/79	02/09/84	2
Washington	WA0025721	DAWN MINING COMPANY	MIDNITE MINE (ON TRIBAL LAND)	T	EXP	10/30/95	10/30/00	2
Washington	WA0026701	THE DALLES LOCK AND DAM			PND			2
Washington	WAS	Stormwater						2
Washington	WAS	Stormwater						2
Washington	WA131000	Washington Tribal Net Pen General Permit		T	PND			2
Washington	WAG130000	AQUACULTURE FACILITIES	FEDERAL & TRIBAL FACILITIES		EFF	08/01/09	07/31/14	3
Washington	WA0002780	DOD NAVY - PUGET SOUND NAVAL	FLEET & INDUSTRIAL SUPPLY CNTR		EXP	01/08/96	01/08/01	3
Washington	WA0037320	SQUAXIN ISLAND TRIBE	HARSTENE OYSTER COMPANY	T		07/29/74	07/01/79	3
Washington	WA0025101	DOD AIR FORCE	MCCHORD AFB		ADC	03/13/75	11/30/79	3
Washington	WA0026573	DEFENSE, NAVY	NAVAL RADIO STATION JIM CREEK		PND			3
Washington	WA0026042	U.S. ARMY COE PORT OF PASCO	PUMPING STA 12-1/DETENTION PD		PND			3
Washington	WA0023442	QUEETS VILLAGE WWTP	QUINAULT TRIBE	T	EXP	09/29/75	08/01/80	3
Washington	WA0021962	DEFENSE, ARMY	YAKIMA TRAINING CENTER WWTP		ADC	03/13/75	09/30/79	3
Washington	WAS	Stormwater						3
Washington	WAS	Stormwater						3
Washington	WAS	Stormwater						3
Washington/Oregon	WA520000	Offshore WA and OR seafood General Permit			PND			1

Summary of Number of Permit in each Tier by State

Permits in each Tier by State				
State	1	2	3	Grand Total
Alaska	2	3	3	8
Idaho	33	22	43	98
Oregon	1	2	2	5
Washington	3	13	11	27
Washington/Oregon		1		1
Grand Total	39	41	59	139