Permit Review Process
EPA Update & Perspective
ASTSWMO Training Conference
August 2019
Points of Discussion

- EPA’s Permit Oversight Policy/Framework
- Current EPA Permit Streamlining Efforts
- Potential Future EPA Permit Streamlining Efforts
EPA’s Permit Oversight Policy & Framework

- Announced by Henry Darwin, EPA’s Acting Deputy Administrator, at Spring 2019 ECOS Meeting
- Goal is to develop a national approach to oversight of permits and permitting programs that is **consistent** and **standardized**
- Would apply to the following state & EPA permit programs:
  - New Source Review (NSR), Title V, NPDES, Underground Injection Control (UIC), and RCRA
EPA’s Permit Oversight Policy & Framework

- Facets of the strategy thus far:
  - Differential oversight
  - Elevation process
  - Criteria/metrics for timeliness and quality of permits
  - Predictable review process
  - Include oversight of “real-time permits” and permitting programs
  - Engaging states in the development process!
**EPA’s Permit Oversight Policy & Framework**

- **Development Timeline**
  - **Summer 2019** – EPA-state workgroups developing key considerations by permit program
    - RCRA Reps: Chip Crockett (ADEM), Victoria Phillips (MassDEP), Mary Setnicar (Region 5), Lisa McArther (Region 10)
  - **Fall 2019** - Draft policy and framework completed and shared with states
  - **Late November 2019** – Final policy completed
Current EPA Permit Streamlining Efforts

- EPA’s FY2018-2022 Strategic Plan, Objective 3.4
  “Issue permits more quickly and modernize our permitting and reporting systems.”

Strategic Measure

SM-22 By September 30, 2022, reach all permitting-related decisions within six months.
Current EPA RCRA Permit Streamlining Efforts

- Tracking EPA-issued backlog permits on a monthly basis
- Revised RCRAInfo report shows the expiration for all permitted facilities, identifies backlog by state/Region
- Developing a federal RCRA permit applicant checklist based on a version developed by Texas CEQ
- Upgrading permit module in RCRAInfo V6; will include ability to attach permit documents
- National permitting priority areas, e.g., upcoming example permit language for RCRA Subparts AA/BB/CC exemption/election provisions
- RCRA training website; RCRA permit writers training
Current EPA RCRA Permit Streamlining Efforts

- **RCRA Permitting Toolbox** – lessons learned from EPA Region 1 and Massachusetts Department of Environmental Protection Lean event (2016)

- Best practices include:
  - Eliminating steps through development of templates
  - Introducing an in-person meeting at the beginning of the process
  - Using a team-based approach for reviewing permit applications

- Tools include:
  - Template letter reminding facility to re-apply for permit
  - Pre-application meeting agenda and timeline
  - Internal tracking system for when permits will expire
Potential Future EPA RCRA Permit Streamlining Efforts

- Enabling electronic submittal of Part A permit form
- Template permit NOD/denial letters for RCRA program
- FY2020 national permitting priority areas – (see Permitting Potpourri Session!)
- We are interested in hearing what you are doing!