NPDES Permit Writers' Clearinghouse User's Guide

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Water Permits Division

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Contents:

Introduction

- 1. Starting Out The Public Home Page
- 2. Users and Accounts
- 3. Clearinghouse Contents
- 4. Retrieving Resources
- 5. Submitting, Editing, and Deleting Resources
- 6. Favorites
- 7. Providing Feedback

Introduction

The NPDES Permit Writers' Clearinghouse is an easily navigable web-based portal to help NPDES authorities access and share resources that can inform permitting decisions. EPA's Office of Wastewater Management developed the Clearinghouse at the request of state NPDES authorities and with the support of EPA Regions, and the Clearinghouse is populated and used largely by states and EPA Regions. It is intended to provide states and Regions with a streamlined way to share NPDES permit resources.

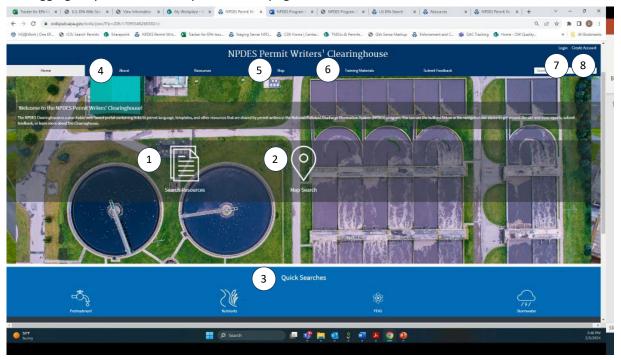
The Clearinghouse is a searchable database containing website links to resources that NPDES authorities have shared. The Clearinghouse is a library of website links rather than actual documents. States and Regions submit links on a voluntary basis. EPA expects permitting authorities to populate and use the Clearinghouse as a way to train new permit writers, find information on difficult or complex permits, share how states approach unique permitting issues, and locate resources such as models, policies, calculators, example permits, guidance, and other permitting-related resources.

EPA does not necessarily endorse resources shared by non-EPA authors or agencies, but it welcomes the posting of non-EPA resources to facilitate information-sharing among NPDES authorities and practitioners.

This user's guide describes how to retrieve resources, submit resources, and perform other functions.

1. Starting Out – The Public Home Page

Anyone can browse the Clearinghouse and retrieve resources at https://www.epa.gov/npdes/permit-writers-clearinghouse or by clicking the link on EPA's NPDES website at https://EPA. gov/NPDES. After logging on you will see this public home page:



The public home page contains buttons that initiate:

- (1) General searches
- (2) Map-based searches
- (3) Quick searches for topics of specific interest

It also contains links to:

- (4) An "about" page with basic information about the Clearinghouse
- (5) Clearinghouse materials that have been specifically identified as training materials
- (6) A form for submitting feedback on the Clearinghouse

At the upper right you can:

- (7) Log in, if you have a General User or Contributor account
- (8) Register for a General User or Contributor account if you don't already have one.

2. Users and Accounts

Although any member of the public can access the Clearinghouse as described above, it is intended primarily for state and EPA NPDES permit writers and other practitioners. Such users are encouraged to register as General Users or (preferably) Contributors to gain additional site privileges.

A. General Users

A General User is anyone who registers in order to obtain additional privileges beyond simply querying resources. If you are a General User you can:

- Suggest resources to include in the Clearinghouse
- Retrieve lists of resources you have suggested for posting
- Flag "favorite" resources for quick access at any time.

B. Contributors

A Contributor is an EPA or state user who would like to routinely edit or add information to the Clearinghouse on behalf of an agency. Each state and EPA Region should designate at least one Contributor.

If you are a Contributor, you have the same privileges as a General User but can also edit the resources you have submitted.

To create a General User or Contributor account: Click the "Create Account" link in the upper-right corner of the public landing page and request to be registered as either a General User or Contributor.

You can request to switch from a General User to Contributor account, or vice versa, by submitting a request using the "Submit Feedback" tab.

3. Clearinghouse Contents

NPDES permitting resources cover a vast array of topics, ranging from administrative procedures to highly technical analyses and evaluations. This section describes some of the general categories of resources in the Clearinghouse.

A. Regulations

EPA has populated the Clearinghouse with links to the federal NPDES regulations. States, tribes, and territories may want to share their own regulations related to NPDES permitting.

B. Policy

EPA has developed policies on topics such as combined sewer overflows (CSOs), water quality trading, and animal feeding operations that are suitable for the Clearinghouse. In addition, states may have developed specific policies related to topics such as implementing water quality standards, conducting use attainability analyses, or implementing antidegradation regulations that would be helpful to permit writers in other states.

C. Guidance

EPA has populated the Clearinghouse with guidance documents that apply at the federal level, such as the NPDES Permit Writers' Manual, the Technical Support Document for Water Quality-Based Toxics Control, and the Guidance Manual for Developing Best Management Practices. EPA also has developed numerous guidance documents for specific NPDES topics such as industrial stormwater,

municipal separate storm sewer systems (MS4s), nutrient discharges, watershed-based permitting, and aquaculture.

Likewise, many states have developed specific permitting guidance resources that they may want to share with other states. State-specific guidance could include procedures for evaluating reasonable potential, implementing whole effluent toxicity (WET) requirements in permits, and implementing water quality criteria or water quality variances.

D. Sample Permits

Permit writers often encounter unique permitting situations and would benefit from widespread sharing of information regarding how they faced the permitting scenario, challenges encountered, resolutions developed, and permitting strategies implemented. The Clearinghouse can be particularly effective as a way for permit writers to share interesting permitting approaches with each other – particularly permits and fact sheets involving unique or technically challenging scenarios.

E. Templates

Many states use templates for permits, fact sheets, administrative letters, response-to-comment documents, water quality assessment technical memos, and effluent limitation rationales. Permit writers would benefit from widespread sharing of templates, as an effort to promote consistency in permitting approaches.

F. Calculators/Models/Tools

Permit writers use a variety of tools during permit development, including technology-based effluent limitation spreadsheets, water quality assessment tools, reasonable potential analysis spreadsheet tools, whole effluent toxicity tools, and water quality models.

G. Training

EPA has developed various in-person and web-based trainings, many of which have training modules or presentation materials available online. For example, the NPDES Permit Writers' Course is available as a web-based training course in addition to the in-person intensive course. Further, online trainings exist for the Water Quality Standards Academy and for pretreatment, WET, and water quality trading program areas. In addition, many states conduct in-house NPDES training, for which they may want to share reference materials.

H. Responses to comments

Responding to public comments on a draft permit can be time-consuming, and permit writers would benefit from sharing their approaches to this step in the permit development process.

4. Retrieving Resources

The Clearinghouse offers several ways to search for resources.

From the sign-in page:

(1) Type a **search term** (e.g., "model," "stormwater") in the Search bar, which looks like this:

Search NPDES Permit Writers' Clearinghouse



(2) Click a **Quick Search** button at bottom to quickly find resources for Pretreatment, Nutrients, PFAS, and Stormwater.



(3) Click the **Map Search** button to find resources authored by a particular state, EPA Region, tribe, territory, or international entity.

From the search screen, to perform a tailored search using filters, click the **Search Resources** button and then either –

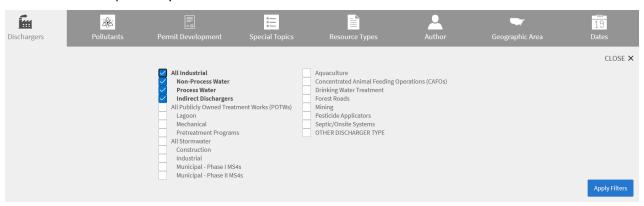
- (4) Click "Resources" in the header bar or
- (5) Click the "Search Resources" button further down the page.

When you reach the Search screen, enter a search term in the Search space in the header bar or use **filters** (see below) to narrow your search by category.

A. Using Filters

From the Search page you can use different combinations of filters to perform a robust search for resources that have been tagged as meeting certain criteria. There are eight categories of filters: Dischargers, Pollutants, Permit Development, Special Topics, Resource Types, Author, Geographic Area, and Dates.

Clicking on a category (e.g., "Dischargers") yields a list of filters in that category (e.g., "All Industrial") and in some cases sub-filters (e.g., "Non-Process Water"). Each category also has an "OTHER" filter for search terms not specifically listed in the filter list.



You can search across multiple categories and filters as follows:

- You can apply several filters within a category to search for resources that meet any of several
 conditions (i.e., a Boolean operator of "or"). For example, in the Pollutants category, checking
 "Nutrients" and "Pathogens" will generate a list of resources that have been flagged for either
 Nutrients or Pathogens.
- You can also apply filters to search across categories to narrow a search to resources that meet
 more than one condition (i.e., a Boolean operator of "and"). For example, clicking "Aquaculture"
 in the Dischargers category and "Nutrients" in the Pollutants category will generate a list of
 resources that have been tagged for both nutrients and aquaculture.

Apply filters and sub-filters by moving between categories and checking the appropriate boxes. Click "Apply Filters" after you've chosen filters and sub-filters in the desired categories.

After you've applied the filters, the selected filters show up in blue boxes at the top of the search screen. You can remove individual filters, or all filters, by clicking the "X" in those boxes. You can also adjust your search by checking or unchecking filter boxes on the search screen and clicking "Apply Filters" when finished.

B. Managing Search Results

You can manipulate your search results using the **Search Management Bar** or clicking the **Column Headings**.

1. Search Management Bar

The **Search Management Bar** looks like this:



All users can use the Search Management Bar to do the following:

Narrow search further. Type any search term in the search box. You can search a specific column by clicking on the dropdown arrow next to the magnifying glass.

Export results. Click "Export Your Results" to export the search results to an Excel spreadsheet.

Specify number of rows. Select a specific number of search results to display, or "all." The Clearinghouse displays the first 50 results as a default.

General Users and Contributors have additional options in the Search Management Bar:

Specify custom reports. The dropdown menu defaults to "Primary Report," which displays the results of the current search. You can also –

- Select "2. My Resources Favorites" to narrow the search to your Favorite resources;
- Select any other user-defined reports you might have saved with the "Actions" dropdown menu (described next).

Select other Display actions. Click on the "Actions" dropdown menu to:

- Select which columns display;
- Filter results according to user-specified search terms;
- Specify the number of records to display per page;
- Change the display format;
- Save a user-defined report that will appear under the Reports menu above; and
- Get online help for these functions.

Note that the display actions are in effect for the current search only and need to be reset for each new search.

2. Column Headings

Click on any column heading to change the display. You can:

- Sort the results in ascending or descending order; or
- Filter the results by column content.

Note that changes to the display characteristics are effective only for the current search. The display resets for each new search.

5. Submitting, Editing, and Deleting Resources

General Users and Contributors can submit or suggest resources for the Clearinghouse or save them in draft form. They can also edit and delete resources they have submitted.

The Clearinghouse Administrator will review all resource submissions, edits, and deletions and will notify you once your submission is approved or denied.

A. Uploading a Resource

1. Access the Clearinghouse

Navigate to the NPDES Permit Writers' Clearinghouse at https://www.epa.gov/npdes/permit-writers-clearinghouse or by clicking the link to the Clearinghouse from epa.gov/npdes.

2. Log into your account and click on "Add Resource."

3. Complete optional fields, if you like

Adding a comment: You can type a comment for your own reference in the *Comments* box at the top of the page. The comment can only be viewed by you, and only for the resources you submit.

Adding an expiration date: You can add a date on which the resource will no longer be retrievable or visible in the Clearinghouse. (The resource will still be stored in the Clearinghouse, however, until manually deleted.)

(Note: This function is not working properly and will not be available until later in 2024.)

4. Provide summary information for the resource

1) Resource Title

Provide a clear, complete title to ensure users can perform productive queries and ascertain whether the resource is of interest. Words used in the title can be used in searches. For a permit, for example, you could include identifying values such as facility name, NPDES number, or location.

Example Permit Resource Title: John City Wastewater Treatment Plant permit, John City, VA (VA11111)

2) Resource URL/Hyperlink

Provide the resource's URL/hyperlink. Confirm that it is readily accessible through the hyperlink and does not require special log-in credentials. For utmost accessibility, link to searchable documents (which have "control-f" key word search functionality) as much as possible.

3) Resource Author

Provide the name of the organization that is the official agency author of the resource. If using an acronym be sure to also spell out the official agency name (e.g., use "Maryland Department of the Environment (MDE)"). You can use the "EPA" acronym suffices for an EPA resource, but you should specify which Region or Office is the author (e.g., use "EPA Region 8" or "EPA Office of Water" rather than just "EPA").

4) Resource Description

Provide a one- or two-sentence description of the resource that provides a strong understanding of the subject matter and identifies unique attributes, including likely search terms and tags if possible (e.g., climate change, environmental justice, PFAS). (Since searches will return results for any words in the Resource Description, consider adding likely search terms.) You can cut and paste from the executive summary if there is one, If the resource is lengthy, consider identifying specific sections or pages to help a user identify specific topics of interest.

Example: "Fact Sheet for the 2018 NPDES permit DC0000221 (DC MS4 Permit). Climate change provisions included in Sections: 1.5.3.1 The Acres Managed Limit (page 8), 2.7 Infrastructure Resilience Assessments (page 20), 3.2.3 Stormwater Retention Credit Program (page 25), and 3.2.9 Green Roofs (page 28).

5) Resource Year

Provide the year the resource is dated or enter "undated" or "unknown" if necessary.

5. Provide tags for the resource:

The ability to apply tags to a resource allows a user to filter searches based on those tags. This is an essential function of the Clearinghouse. In the "Additional Information" section, carefully apply tags for the resource by selecting the applicable value for each category as follows:

1) Dischargers

Select the most appropriate Discharger category ("All Industrial," "All Stormwater," etc.) or subcategory(ies) ("Non-Process Water," "Process Water," etc.).

2) Pollutants

Check only those pollutants of unique and specific interest to a potential query, rather than all pollutants mentioned in the resource.

3) Permit Development

This broad category includes specific resource types (e.g., applications and NOIs), analytical components (e.g., mixing zones, anti-backsliding), and categories of permit requirements (e.g., monitoring, standard conditions). Consider the question "What interesting or unique permit development components does this resource highlight? and select all that apply.

4) Special Topics

This broad category includes specific program components (e.g., 316(b), CSOs), processes (consultation with Services), and tools (NetDMR). Consider the question, "What interesting or unique special topics does the resource address?" and select all that apply.

5) Resource Type

This category identifies what the resource is—e.g., calculator, permit, policy, regulation. Select all types that apply.

6) Resource Author (type)

Indicate whether the resource author is an academic author, government agency (federal, state, territory, tribe, or local), private entity, or non-governmental organization. Usually the Contributor belongs to the organization identified as the Resource Author.

7) Geographic Area

If the resource applies to a specific geographic area, select it. If you select a state, you don't have to automatically select the EPA Region, or vice versa, unless doing so would assist a search. If the geographic area is unspecified or the resource applies nationally, select "National" and leave the EPA Regions and states blank.

When a category is checked, all of its subcategories are checked automatically but can be unchecked individually.

As a general rule, apply tags for only the most relevant categories or subcategories. You don't have to apply tags for each category.

Helpful Hints for Tagging

Topics covered under multiple categories

A resource typically belongs to several categories of filters, so be sure to tag filters and sub-filters under each applicable category to ensure the resource will reliably be returned as a search result under various search scenarios. For example, if you are posting a permit for a POTW, you might tag filters in the "Dischargers," "Pollutants," "Permit Development," and "Special Topics" categories. If a topic isn't addressed under a particular heading, leave the check-boxes under that heading blank.

Resources categorized as "Other"

If you categorize a resource as belonging to a topic or category not listed, select "Other" and then include the applicable keywords in the Resource Description to ensure it will be returned when a user searches using one of those keywords.

Focus on unique or innovative aspects

When considering which sub-filter tags to select, focus on the unique or innovative aspects of the resource. For example, all POTW permits include effluent limits for BOD and TSS, so don't tag "Conventional Pollutants" under "Pollutant Type." However, if a POTW resource includes PFAS provisions, be sure to check the PFAS filter. In general, be sure to tag any aspect of a resource that made it worth adding to the Clearinghouse.

Filter-specific tips

For purposes of the Clearinghouse (recognizing that official definitions may differ), follow these tips to avoid overlap or confusion among tags with similar meanings.

"Indirect Discharger" vs. "Pretreatment Program":

Tag a resource as "Indirect Discharger" if it specifically addresses topics related to indirect dischargers to POTWs, such as an IU permit or IU inspection protocols. Tag a resource with "Pretreatment Program" when it addresses pretreatment program information for the POTW control authority such as program submissions, program review guidance, local limit development, legal authority reviews, or enforcement response plans.

"Ammonia" vs. "nutrients":

Tag ammonia as a toxic pollutant and not a nutrient. Pollutants considered as nutrients include phosphorus, phosphate, nitrogen, total Kjeldahl nitrogen, dissolved inorganic nitrogen, nitrates, and nitrites.

"Priority pollutants" vs. "toxics":

The Toxic Pollutant List was developed in 1976 and subsequently added to the Clean Water Act by Congress in 1977. The list was intended to be used by EPA and states as a starting point to ensure that effluent guidelines regulations, water quality criteria and standards, and NPDES permit requirements addressed the problems of toxics in waterways. However, this list consisted of broad categories of pollutants rather than specific, individual pollutants. Therefore, EPA developed the Priority Pollutant List in 1977 to make implementation of the Toxic Pollutant List more practical for water testing and regulatory purposes.

For purposes of the Clearinghouse, use "Priority Pollutants" to refer to the specific list of chemical pollutants EPA regulates under that designation, and for which EPA has published analytical test methods. The Priority Pollutant list is more practical for testing and for regulation in that chemicals are described by their individual chemical names.

In the context of the Clearinghouse, "Toxic Pollutants" include the general categories of inorganics, metals, and organic pollutants. Also, pollutant names are more open-ended, such as "chlorinated benzenes."

6. Save, Submit, or Print the Resource

After completing the contact information fields and selecting appropriate and meaningful topic tags, you can save a resource as draft, submit it for review and approval, or print it out.

1) Save as Draft

At any stage of the process, you can save a resource (and its data) as draft if you're not ready to submit it. Draft resources are hidden from other users including the Clearinghouse Administrator. You can edit and submit a draft resource at any time; see "Editing Resources" below.

2) Submit for review/approval

You can submit the resource by clicking the blue "Submit for Review" or "Suggest for Review" button at the bottom of the resource submission page.

- EPA will send an automatic email reply acknowledging receipt and another notifying you whether the resource was approved or declined.
- Once approved, a resource is posted to the Clearinghouse automatically.

• Whether approved, declined, or still pending (not yet approved/declined), you can edit the resource using the dropdown menu at My Items > My Resources (see below).

3) Print

Click the "Print" button to print a copy of the user input page for this resource.

B. Editing a Resource

If you are a registered General User or Contributor, you can submit edits to any resource that you have saved or submitted, whether it is saved as draft, submitted for approval ("Pending"), submitted and approved, or submitted and declined.

Start by doing the following:

- Click on "My Items," then "My Resources."
- In the Reports box, click 1. Pending Resources, 2. Approved Resources, 3. Declined Resources, or 4. My Draft Resources, depending on the status of the resource you want to edit.
- Click the magnifying glass icon for the resource you want to edit.

Then do the following, depending on the status of the resource:

Draft resource (not yet submitted for review) or **Pending** resource (submitted but not yet reviewed):

- Edit any fields or filters.
- Resave it as a draft or submit it for review.

Approved resource (i.e., already in the Clearinghouse) or **Declined** resource:

- Click "Revert to Draft."
- Go back to the Reports box and click 4. My Draft Resources.
- Edit any fields or filters.
- Resave it as a draft or submit it for review.

Note that:

- If you edit and resubmit a resource that has already been Approved or Declined, its status changes to Pending and it must be re-approved.
- You can edit only the resources you have saved or submitted, and not those from other users.

C. Deleting a Resource

You can delete any resource that you have saved or submitted:

- Click on "My Items," then "My Resources."
- In the Reports box, click 1. Pending Resources, 2. Approved Resources, 3. Declined Resources, or 4. My Draft Resources, depending on the status of the resource you want to delete.
- Click the magnifying glass icon for the resource you want to delete.
- Click "Delete." Note that you can delete only the resources you have saved or submitted, and not those from other users.

6. Favorites

A General User or Contributor can identify "Favorite" resources for quick access.

- To flag a Favorite resource from a resource list: Check the star at the left of the resource's listing.
- To remove a resource from Favorites, uncheck the star.
- To see your list of Favorites, click *My Items* and then *Favorite Resources*.

7. Providing Feedback

Any Clearinghouse user can submit feedback on specific resources or other Clearinghouse issues. The Clearinghouse Administrator(s) will consider the feedback and provide a response. From the main landing page, click "Submit Feedback or Resource." On the submittal page, provide your contact information and click "Provide Feedback."