

BREAK OUT SESSION

Industrial – Permitting

- Permitting Coverage & Requirements
 - How are you dealing with staff shortages and lack of expertise (e.g. when an engineer might be needed)?
 - What are states doing for PFAS and other "new" contaminants? What permit requirements do you feel are reasonable?
 - How are permitting authorities addressing non-filer facilities?
 - How are Additional Implementation Measure provisions working? What data are you collecting to show success?

○ Permitting Coverage & Requirements

○ How are permitting authorities handling the permitting of secondary and unlisted SIC codes?

○ Do you feel like you have a defensible process for making reasonable potential analyses? Has your approach been challenged in comments or court?

How are states addressing BMP accounting and tracking?

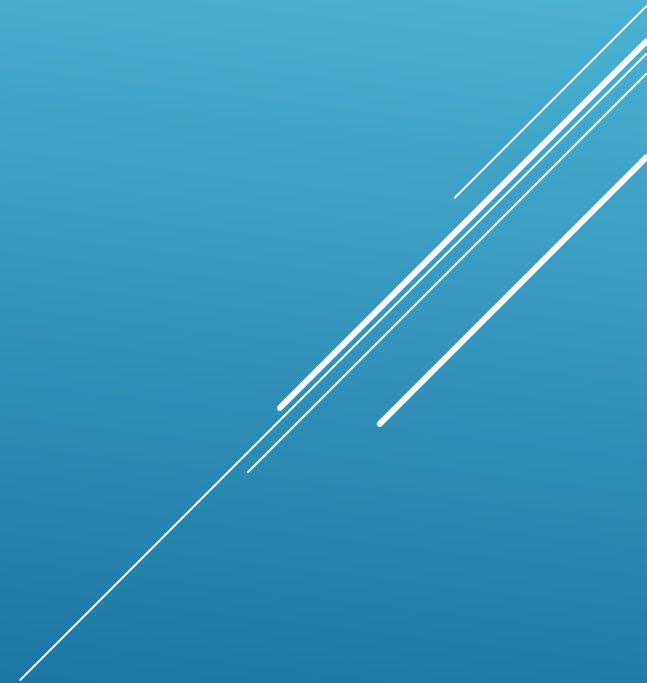
○ How are permitting authorities incorporating TMDL Implementation requirements into permits?

○ Which states are doing something different from EPA's MSGP for monitoring requirements? Are there facilities that do not have to monitor?

- Innovative Programs
 - Are there states experimenting with new approaches to ensure compliance assurance?
 - Are there any permitting authorities combining/standardizing “clean marina” designations/permit requirements?
 - What tools are states using to locate nonfilers, e.g., Dun & Bradstreet?
 - Which states are incorporating PFAS sampling/source reduction?

- Future Considerations

- Are any states exploring the idea of extending permit terms beyond 5 years for state permits? Are state aware of conversations around updating the CWA to allow 10 year permits for NPDES?
- What permitting authorities are using NAICs?



▶ **The End**

