EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 1-66

☐ Other ☐ Amendment Number:

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2018 Base Option Period Number 1	WEFTEC Support - MM302301

Contractor: EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW: See PWS

Purpose:
- [X] Work Assignment
- [ ] Work Assignment Amendment
- [ ] Work Plan Approval
- [ ] Work Assignment Close-Out
- [ ] Incremental Funding

Period of Performance: From 08/01/2017 To 01/31/2018

Comments:

☐ Superfund — Accounting and Appropriations Data — [X] Non-Superfund

Note: To report additional accounting and appropriations date use EPA Form 1900-69A.

SFO (*Max 2*) ☐

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period: 07/01/2016 To 06/30/2018 Cost/Fee: LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee LOE:

Cumulative Approved: Cost/Fee LOE:

Work Assignment Manager Name Tara Johnson (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-6186 FAX Number:	
Project Officer Name Tangela Cooper (Signature) (Date)	Branch/Mail Code: Phone Number: 202-566-0369 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 8/1/2017 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 1-66

TITLE: Support for the EPA Exhibit at the Water Environment Federation's WEFTEC Conference & Exposition

WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):

Tara M. Johnson **Phone:** 202-564-6186 **Fax:** 202-501-2346 johnson.tara@epa.gov	**USPS Mailing Address** 1200 Pennsylvania Ave NW (MC 4204M) Washington, DC 20460	**Courier Address** 1201 Constitution Ave NW Washington, DC 20004

ALTERNATE WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (ALTERNATE WACOR):

Gajindar Singh **Phone:** 202-564-0634 **Fax:** 202-501-2396 singh.gajindar@epa.gov	**USPS Mailing Address** 1200 Pennsylvania Ave NW (MC 4204M) Washington, DC 20460	**Courier Address** 1201 Constitution Ave NW Washington, DC 20004

PERIOD OF PERFORMANCE: August 1, 2017 through January 31, 2018

ESTIMATED LEVEL OF EFFORT (LOE): 135 Hours

BACKGROUND: WEFTEC, the Water Environment Federation's annual conference, is the premier national conference for the water and wastewater industry. Last year, WEFTEC attracted over 20,000 participants representing federal, state, local and private entities. WEFTEC is a venue for EPA to network and share information, including research findings, with the water industry. WEFTEC 2017 will be held in Chicago, Illinois on September 29 – October 4.

EPA's Office of Wastewater Management (OWM), Office of Wetlands, Oceans, and Watersheds (OWOW), Office of Science and Technology (OST), Office of Research and Development (ORD), Office of Ground Water and Drinking Water (OGWDW), Office of Enforcement and Compliance Assurance (OECA), and EPA Regions participate in this conference. EPA's participation in this national conference requires contractor assistance for pre-event, on-site, and post-event support.

PURPOSE AND OBJECTIVE: During the period of performance, the contractor will support the various activities associated with exhibiting and participating in WEFTEC 2017 at the McCormick Place in Chicago, IL from September 29 – October 4. The work performed under this task order is similar in nature and scope to the support provided by MDB, Inc. under

previous task orders for WEFTEC 2009 through 2016, excluding 2013 due to the 2013 government shutdown. The contractor will ensure compliance with Agency standards.

SCOPE OF WORK

TASK 0: WORK ASSIGNMENT MANAGEMENT

The contractor shall routinely provide performance updates, estimated costs, level of effort (LOE) and key deliverables upon request from EPA's Work Assignment Contracting Officer's Representative (WACOR) and/or Alternative WACOR for all ongoing tasks. Regularly scheduled bi-weekly conference calls and in-person meetings, as needed, will be coordinated between EPA's WACOR and the contractor to discuss the work assignment and progress of tasks. In addition, the contractor shall provide a monthly progress report that includes implementation plan(s); issues encountered and lessons learned regarding the progress of all tasks, the tracking of expenditures, and any other administrative activities, as requested.

Deliverables: The contractor shall provide a monthly progress report that will include the status of the implementation plan and issues encountered. The contractor shall report all expenditures and provide any relevant invoices as available. The contractor shall maintain a cumulative list of all technical directives. The contractor shall report in accordance with Contract Reporting Requirements.

TASK 1: HOLD KICK-OFF MEETING

Within 10 business days following task order issuance, the contractor shall meet with the WACOR to discuss the details and schedule of completion of tasks and their deliverables. At the meeting, which can be a teleconference, the WACOR will clarify all task details as well as the schedule of deliverables with the contractor. The contractor shall submit a schedule of tasks to be completed and submission of deliverables to the WACOR for review and approval. This meeting is intended to ensure full understanding of the order and to ensure a full understanding of roles and expectations.

Deliverables: The contractor shall provide to the WACOR a schedule of tasks to be completed within 10 business days of the kick-off meeting.

TASK 2: ARRANGEMENTS FOR GOODS AND SERVICES TO SUPPORT EPA EXHIBIT

The contractor shall provide all onsite rentals before "order discount deadline" expiration. These rental items are specified in the below list and include furniture (e.g. tables and chairs), carpet, electrical service, audio/visual equipment, computers and monitors, and phone and data transmission lines. The contractor shall also provide labor to set up and dismantle the booth.

Quantity Items required:

- Six (6) internet connections
- One (1) Hub rental for computer lines
- Six (6) Category 5 Cable 50 ft.
- Five (5) Desktop Computers – 1 for each kiosk
- One (1) Laptop Computer – for front reception desk
- Twelve (12) Stools
- Fifteen (15) Chairs
- Two (2) 6 ft. x 30 in. draped blue tables and draped fourth side
- One (1) small side table with draping
- Three (3) bistro tables (podium substitution)
- Two (2) Lead Retrieval Devices
- Six (6) Electrical Connections (15amp, 120 volt, 1500 watt)
- One (1) Days' Vacuuming Service (prior to show opening)
- Fifty (50) square foot mesh reinforced plastic covering for carpet shipping post-show
- Drayage for approximately 6,000 lbs of freight
- Two (2) Days of installation labor based on previous experience (not weekend work)
- One and one-half (1.5) Days of dismantle labor (not weekend work)
- Supervision of Booth installation and dismantling from a company familiar with the booth
- Two (2) green plants 4 foot in brushed chrome container
- One (1) wireless microphone with speakers
- Liability insurance as required by McCormick Place
- Various Conference Supplies (as needed)

Deliverables: The contractor shall provide copies of the order sheets by September 22, 2017 for the items listed above to confirm necessary items have been ordered and should be available onsite.

TASK 3: DELIVERY OF EPA EXHIBIT

The contractor shall ship approximately 6,000 lbs of exhibit crates and handout materials (skid mounted), from the EPA's Blue Ash, Ohio warehouse to the McCormick Place in Chicago, IL and at the end of the show shipping ship back to EPA's Blue Ash, Ohio warehouse.

These items all reside in or will be shipped from EPA's Blue Ash, Ohio warehouse in advance of the shipment date. The contractor shall provide EPA's warehouse with proper shipping labels and a bill of lading for the release of the crates and document skids.

Deliverables: The contractor shall provide shipping labels and bill of lading by October 20, 2016.

TASK 4: PREPARATION OF FLASHDRIVES FOR DIGITAL TRANSFER OF EPA MATERIAL

In an effort to reduce environmental impacts of printing and shipping paper hard copies of documents, the contractor shall upload electronic documents provided by EPA onto flashdrives for distribution at WEFTEC 2017. The contractor will provide and prepare 1,500 flashdrives. EPA will provide lanyards and key rings for assembly (currently stored with the booth at EPA's Blue Ash, Ohio warehouse). The contractor shall lock down the material on the flashdrive so it cannot be edited. The contractor shall also provide a business-card sized description of the flashdrive and its contents and shall attach the description to each key ring. These will be attached to the flashdrive to ensure that the contents of the flashdrives are apparent to attendees that take one. EPA will provide an example to the contractor.

The contractor will ship assembled flashdrives to the McCormick Place in Chicago, IL.

This task was previously done for WEFTEC 2011-2016 (excluding 2013) with great success. EPA is looking to continue that effort by adding new and updated materials from various offices as well as locking the materials down to prevent edits.

Deliverables: The contractor shall provide 1,500 loaded and assembled flashdrives to EPA at WEFTEC 2017 at the McCormick Place in Chicago, IL.

TASK 5: ONSITE SUPPORT

The contractor shall provide one employee to provide onsite support to the EPA exhibit; supervise assembly and disassembly of the exhibit; maintain documentation; troubleshoot; and interact with EPA coordinators. The contractor employee shall not represent himself or herself as an EPA employee and shall clearly identify himself or herself as a government contractor.

Deliverables: The contractor shall supervise assembly of display units and maintain their operation for the entire length of the WEFTEC conference and supervise disassembly of units post-show.

TASK 6: PRE- AND POST-SHOW SURVEYS

As part of the WEFTEC 2017 pre- and post-show activities, the contractor shall generate online surveys to distribute to the leads gathered via the Lead Retrieval Devices. The questions have been preset as part of the approved EPA ICR number 2434.37. No additional question shall be added or substituted. OWM is gathering this information from participants so that it can be used to better prepare for the coming year's conference and to determine ways the WEFTEC EPA exhibition booth can be improved after the show. The WACOR will provide the questions at the kick-off meeting.

Deliverables: The contractor shall provide an online pre-show survey consisting of the approved questions for WACOR review within 15 business days of the kick-off meeting. Results from the pre-show survey will be consolidated, analyzed, and provided to the WACOR by September 5,

2017. The contractor shall provide an online post-show survey consisting of the approved questions for WACOR review no later than October 4, 2017. Results from the post-show survey will be consolidated, analyzed, and provided to the WACOR by November 6, 2017.

DELIVERABLES REQUIRED AND SCHEDULE FOR COMPLETION OF TASKS

Task	Item Require	Due Date	Number of Copies and Format Requirements
0	Monthly progress report	Last week day of each month	1 copy - Word Format or PDF
1	Schedule of tasks to be completed	Within 10 business days of the kick-off meeting	1 copy - Word Format or PDF
2	Copies of the order sheets	No later than September 22, 2017	1 copy of each - PDF
3	Shipping labels and bill of lading	No later than October 20, 2017	1 copy of each - PDF
4	Purchasing flashdrives	No later than September 11, 2017	1500 flashdrives
5	Print business-card size descriptions for distribution with flashdrives and lanyards	No later than September 22, 2017	1500 copies
6	Loading of flashdrives with EPA-provided material	No later than September 22, 2017	1500 loaded flashdrives loaded with EPA provided materials and locked to prevent editing
7	Assembly of flashdrives, key rings, lanyards and description cards	No later than September 30, 2017	1500 assembled flashdrives for distribution during WEFTEC 2017
8	Online pre-show survey	Within 15 business days of the kick-off meeting	1 online survey sent to leads
9	Results of online pre-show survey	No later than September 5, 2017	1 consolidated and analyzed report of all survey responses received
10	Online post-show survey	No later than October 4, 2017	1 online survey sent to leads
11	Results of online post-show survey	No later than November 6, 2017	1 consolidated and analyzed report of all survey responses received

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

CONTRACT PWS REFERENCE

Task 3.7 "Information Management", Page 14 of 28, Task 3.7.9: The contractor shall provide outreach support in coordinating logistics, site selection, and site reservation for EPA sponsored award programs, public hearings, workshops, conferences, and meetings related to regulatory and program development.

ANTICIPATED TRAVEL REQUIREMENTS

All travel shall be approved in advance by the Contract-Level Contracting Officer's Representative (CL-COR) and shall be in accordance with the Contract.

ADDITIONAL REQUIREMENTS

Office direct costs (ODCs) for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this delivery order without the prior written approval of the Contracting Officer.

Upon issuance of written technical direction, the Contractor shall submit for inspection of all work in progress at any time under this work assignment. The Contractor shall develop and maintain files supporting each task.

The contractor shall contact the CL-COR by telephone to discuss any problems that may adversely affect the work on this Work Assignment. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO and the CL-COR.

CONTRACTOR IDENTIFICATION

To avoid any perception that contractor personnel are EPA employees, the contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites.

CONTROL REQUIREMENTS

Quality Assurance Project Plan (QAPP):

All work conducted under this WA is subject to the guidelines of the contract quality management plan. A separate QAPP is not anticipated for this WA. The requirements of Task 6 are covered under EPA ICR number 2434.37. Survey responses will consist of opinion-based feedback only. No environmental data will be collected.

Organizational Conflict of Interest:

The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in FAR Subpart 9.5, or that the contractor has disclosed all such relevant information. See contract clause 1552.209-71 Organization of Conflict of Interest.

Notification of Conflicts of Interest Regarding Personnel:

The Contractor shall immediately notify the CL-COR and the Contracting Officer of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract, or (2) any such conflicts concerning subcontractor employees or consultants working on or having access to information regarding the contract, when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work. See Section H.4, contract clause EPAAR 1552.209-73 Notification of Conflict of Interest.

Enforcement Sensitive Information:

The contractor recognizes that contractor employees in performing tasks specified by this WA may have access to data/information, either provided by the government or first generated during contract performance, of enforcement sensitive nature which should not be released to the public without Environmental Protection Agency (EPA) approval. Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel, including but not limited to, subcontractor and consultant personnel assigned to work on this contract and/or WA, or with access to materials developed pursuant to such efforts, understand that this information is confidential and any disclosure or misuse of the information may result in prosecution to the fullest extent of the law. All contractor personnel are expected to exercise due diligence in safeguarding, handling or disposing of any such information.

Project Employee Confidentiality Agreement

The contractor agrees that the contractor employee will not disclose, either in whole or in part, to any entity external to the EPA, the Department of Justice, or the contractor, any information or data (as defined in FAR Section 27.401) provided by the government or first generated by the contractor under this contract, any site-specific cost information, or any enforcement strategy without first obtaining the written permission of the EPA CL-CPR. If a contractor, through an employee or otherwise, is subpoenaed to testify or produce documents, which could result in such disclosure, the contractor must provide immediate advance notification to the EPA so that the EPA can take action to prevent such disclosure. Such agreements shall be effective for the life and for a period of five (5) years after completion of the contract.

Handling of Confidential Business Information (CBI)

Contractor's access to TSCA CBI must comply with the procedures set forth in the TSCA CBI Security Manual. Likewise, access to FIFRA CBI shall follow the security procedures set forth in the FIFRA Information Security Manual.

To the extent that the work under this contract requires access to proprietary or confidential business or financial data of other companies, and as long as such data remains proprietary or confidential, the contractor shall protect such data from unauthorized use and disclosure.

All files or other information identified as Confidential Business Information (CBI) shall be treated as confidential and kept in a secure area with access limited to only contractor personnel directly involved in the case or special project assignment. The contractor, subcontractor, and consultant personnel are bound by the requirements and sanctions contained in their contracts with the EPA and in EPA's confidentiality regulations found at 40 CFR Part 2, Subpart B. The contractor subcontractors, and consultant must adhere to EPA-approved security plans which describes procedures to protect CBI, and are required to sign non-disclosure agreements before gaining access to CBI.

All official data, findings, and results of investigations and studies completed by the contractor shall be available for EPA and DOJ internal use only. The contractor shall not release any part of such data without the written direction of the WACOR.

Conference/Meeting Guidelines and Limitations

The contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated $20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

PERFORMANCE SURVEILLANCE PLAN			
Performance Requirement	**Measurable Performance Standards**	**Surveillance Methods**	**Incentives/Disincentives**
Management and Communications: During the life of this work assignment, the Contractor shall notify EPA immediately of any issues that may impact the timeliness of deliverables of the problems associated with the development of deliverables.	The Contractor shall maintain contact with the WACOR throughout the performance of the work assignment. The contractor shall identify to the WACOR any delays with regard to deliverables not less than one week prior to the deliverable date that has been established in the work assignment or technical direction document. The contractor shall identify to the WACOR any issues or concerns that have a direct impact on project schedules within three (3) days of occurrence. The contractor shall provide options for EPA's consideration on resolving or mitigating the impacts identified.	WACOR and CL-COR (as necessary) will allocate the time needed to discuss and address all issues identified by the Contractor. The WACOR and CL-COR will document and maintain a complete record of the issues, agreements and outcome. The WACOR and CL-COR will review monthly progress reports for indicators of problems not previously mentioned. The WACOR will also monitor the timely receipt of deliverables. For those that are late without prior notice, the EPA will formally document to the Contracting Officer the late delivery.	If the contractor fails to implement corrective actions after EPA identifies and provided written documentation of performance issues, EPA will rate this performance category "unsatisfactory." If three or more the active work assignments for the period are rated unsatisfactory, EPA will rate the Business Relations category as unsatisfactory in the CPARS Contract Performance System.

Cost Management and Control: The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where practical.	The Contractor shall monitor, track and accurately report level of effort, labor cost, other direct cost and fee expenditures to EPA through monthly progress reports and approved special reporting requirements. The Contractor shall assign appropriately leveled and skilled personnel to all tasks. The contractor should not exceed established work assignment ceilings and, in general, should expend dollars and hours at similar ratios. If either the expenditure of hours or dollars deviates significantly, the contractor shall provide an explanation in its Monthly Progress Report.	The CL-COR will routinely meet with the Contractor's Project Manager to discuss the work progress and contract and individual work assignment level expenditures. The CL-COR and WACOR shall review the Contractor's monthly progress reports and request the Work Assignment Contracting Officer's Representative to ensure that ceilings are not exceeded, that progress is being made, and that the contractor is effectively utilizing the LOE provided under the work assignment.	EPA will thoroughly review work assignment funding ceiling overruns to determine the contractor's ability to control the situation. If EPA determines that the contractor failed to control cost, the contractor will be rated "unsatisfactory" in this category. Multiple incidents of work assignment overrun that result in an overall cost overrun of greater than 4% of the approved total work assignment funding for the current contract period, will result in an unsatisfactory rating in the CPARS Contract Performance System.
Quality of Product/Services: The contractor shall ensure documents developed under this task order are quality products that are factual and based on sound science and engineering principles.	Products delivered under this work assignment must not contain any major factual errors. The analyses provided in each product shall be logical, consistent, and defensible.	The WACOR will review all documents delivered under this work assignment for content accuracy.	If EPA determines that the contractor's analyses is factually inaccurate or if significant technical errors are found in any documents produced by the contractor, EPA may determine that the cost associated with redoing the work shall be borne by the contractor. Multiple incidents of this nature under the contract will result in an unsatisfactory rating for Quality and Manage Control being reported to the CPARS Contract Performance System.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 1-67

☐ Other ☐ Amendment Number:

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2018 Base Option Period Number 1	ICIS NPDES

Contractor: EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW: See PWS

Purpose:
- [X] Work Assignment
- [ ] Work Assignment Amendment
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Authorized Work Assignment Ceiling

Contract Period: 07/01/2016 To 06/30/2018 Cost/Fee: LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee LOE:

Cumulative Approved: Cost/Fee LOE:

Work Assignment Manager Name Peter Kozelka (Signature) (Date)	Branch/Mail Code: Phone Number: 415-972-3448 FAX Number:	
Project Officer Name Tangela Cooper (Signature) (Date)	Branch/Mail Code: Phone Number: 202-566-0369 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 7/1/2017 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 1-67

TITLE: Technical Support for California NPDES program

WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):

Peter Kozelka
EPA Region 9
75 Hawthorne St. Mail Code: WTR 2-3
San Francisco, CA 94105
(415) 972-3448
kozelka.peter@epa.gov

ALTERNATE WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (ALTERNATE WACOR):

Pascal Mues
EPA Region 9
75 Hawthorne St. code: WTR 2-3
San Francisco, CA 94105
(415) 972-3768
mues.pascal@epa.gov

PERIOD OF PERFORMANCE: July 1, 2017 through June 30, 2018

BACKGROUND

The Clean Water Act (CWA) authorized efforts to restore and maintain the Nation's waters, including Section 402 of the Act specifically created of the National Pollutant Discharge Elimination System (NPDES) permit program to regulate and reduce the point source pollution. Point sources must obtain a discharge permit from the proper authority, including states, tribes, and territories. EPA Regions are responsible for implementing the NPDES permit program in non-delegated States and for federal and tribal dischargers in authorized States. The State of California is authorized to operate the NPDES program through the State Water Resources Control Board and nine Regional Water Boards.

EPA maintains the Integrated Compliance Information System-NPDES (ICIS-NPDES) as the national database of record for the NPDES program, and all states with NPDES delegation are required to enter their NPDES permit-related data into ICIS-NPDES. EPA Region 9 has historically utilized contractor support to support California's NPDES data requirements in ICIS-NPDES. EPA Region 9 has also previously provided technical support to facilitate permit development and issuance in California, including pretreatment inspections, program reviews, permit writing, training and specialized technical assistance to ensure protection of receiving water quality. Contractor support to be performed represents part of EPA's technical support to the State of California's NPDES program.

PURPOSE AND OBJECTIVE

The contractor shall, in consultation with EPA, provide technical support of California's NPDES permit program for three tasks: data entry in ICIS-NPDES, pretreatment inspections and permit writing.

Data entry and training will support EPA Region 9 and California data entry and reporting using the NPDES Permit Status Tracking List (NPST), which the State and EPA Region 9 use to assist in tracking NPDES permitting activities.

Pretreatment inspections and related activities will support one aspect of California's NPDES program to control nondomestic wastewater that is discharged to municipal sanitary sewer systems; also known as publicly owned treatment works (POTWs). The contractor shall provide technical assistance in pretreatment.

Permit writing support will include preparing draft individual permits, selected permit components, and/or generating standardized NPDES permit language to meet the needs of the State of California and ensure compliance with the Clean Water Act and other applicable federal laws. EPA may also ask contractor to provide specialized technical assistance on various NPDES topics, such as impacts evaluation of cooling water intake structures, dilution allowances, or thermal impact evaluations. The work to be performed may include providing technical and policy evaluations for specific NPDES permits or for issues that are relevant to many NPDES permits.

ASSUMPTIONS AND CONSTRAINTS
For all three tasks, the contractor shall possess and exercise a comprehensive understanding of the Clean Water Act, the Porter-Cologne Act, and all other relevant federal and state water protection laws; the skills and tools necessary to conduct pretreatment audits, inspections, and programmatic reviews, and a thorough appreciation of California's regulatory programs and practices in Clean Water Act – NPDES permitting.

The contractor is authorized to contact the SWRCB and Regional Water Boards directly to obtain additional information but shall copy EPA on all information requests and document all requests and responses for EPA. The contractor shall inform the EPA Work Assignment Contracting Officer's Representative (WACOR) of any such information requirements. The contractor shall only follow technical direction received from the WACOR.

Permitting writing assignments may shift over the course of performing work as the needs of individual Regional Water Boards change, but the work performed will be for a predetermined number of permits in each of three (3) levels of complexity and support required. The number of permits for each level of complexity, and what tasks are anticipated under each level, are listed below under Task C. Specific permits on which assistance is to be provided will be identified to the contractor in a technical directive by the EPA Work Assignment Contracting Officer's Representative (WACOR), along with applicable NPDES permit number.

If travel to and from California locations is required for these tasks, it should be limited to a reasonable number of trips, not to exceed fifteen (15), unless staff conducting the trip(s) are locally based.

The contractor shall demonstrate an understanding of, and follow, all applicable laws, regulations and policies.

The contractor shall ensure compliance with Agency standards.

The work described under this PWS may be extended by additional one-year option periods, provided that: (1) the Government has a need for continued performance, (2) the contractor has achieved acceptable quality levels, and (3) the contractor receives notice of the availability of funding. Note: Exercise of the additional one-year option periods are contingent upon meeting contract level award term requirements.

The Government can unilaterally exercise an option if notification to exercise the option is provided to the contractor within 30-60 days prior to the end of the current period performance. If the Government provides notification to exercise the option in less than 30 days prior to the end of the current period of performance, exercise of the option is negotiated bilaterally.

SCOPE OF WORK

This PWS describes services required to support EPA Region 9 to carry out all tasks delineated below within the context of the NPDES permitting requirements of the Clean Water Act. The contractor shall perform all activities in a manner consistent with all federal data requirements safeguarding the relationship between the federal government and the State of California.

TASK A-1: Data Entry for NPDES Permits into ICIS-NPDES

The contractor shall support EPA Region 9 in entering NPDES permit data into ICIS-NPDES. The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCB) will send copies of recently issued NPDES permit actions, including permit adoptions, reissuances, and modifications, enforcement actions, Time Schedule Orders, Compliance Schedule Orders, recessions, and amendments directly to the contractor. The contractor shall enter all permitting data pertaining to Appendix A of the electronic rule that is available within the permit documentation, including, but not limited to, permit facility, permit tracking, and permit limits. The contractor shall assume 120 (approximately 60 major and 60 minor) NPDES permits will be issued and provided for input to ICIS-NPDES. The contractor will not be responsible for General Permits; however, will enter all basic permitting information.

EPA will supply the State Water Resource Control Board (SWRCB) and contractor with the Quarterly Non-Compliance Report (QNCR). The contractor shall review and provide QNCR data support to California during the time period of the unofficial Reportable Non-Compliance (RNC) Run, generally November, February, May, and August of each fiscal year. The contractor shall support the SWRCB with ICIS-NPDES database updates as needed for permits in a Non-Compliance status. The contractor shall make any required data updates to the ICIS-NPDES database as requested by the SWRCB.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task A-1 data entry.

TASK A-2: Support for Tracking NPDES Permit Issuance in the NPDES Permit Status Tracking List

The Web-based NPDES Permit Status Tracking List (NPST) was designed to assist in effectively managing the NPDES permit issuance process in California. NPST utilizes NPDES permit application, public notice, public comment period, permit issuance, permit effective, and permit expiration dates for all permittees. From this information NPST will report schedules for permit reissuance, track permit reissuance progress (including interim milestones), and support estimates for permit issuance workloads and resources for future fiscal years. The system will provide automated summary tables and charts to assist in providing updates to NPDES permit issuances.

Under this task, the contractor shall provide support in maintaining NPST to assist work planning between the SWRCB and the nine RWQCBs. Specifically, the contractor shall be required to extract relevant data and information from ICIS-NPDES subsequent to permit adoption (issuance). The types of

information that must be extracted include:

- NPDES Permit Number, Permit Name, Facility Name; and
- NPDES application, public notice, public comment period, permit issuance, effective, and expiration dates.

The contactor shall also retrieve from the SWRCB and the nine RWQBs additional permit information not contained in the ICIS-NPDES system and enter it into the NPST. The additional information includes:

- Order Numbers as assigned to individual permits by the SWRCB and nine RWQBs; and
- The detailed list of proposed permit reissuances/adoptions for the fiscal year.

The contractor shall follow the approach and procedures for providing support for tracking NPDES permit issuance that are currently used to support the NPDES program effort in California. The specific procedures and protocols were developed to ensure high quality data is maintained within NPST. The specific approach is summarized briefly below:

- The contractor will receive copies of adopted Orders (NPDES individual, general and MS4 permits) from SWRCB and each of the nine RWQCBs. After receipt, the contractor shall ensure all copies are dated and logged into a document control system. Electronic copies with electronic signature posted online by SWRCB and RWQCBs are acceptable as are hard copies with original signatures.

- After receipt from SWRCB or a RWQCB, the contractor shall enter the relevant (NPDES individual, general and MS4) permit information in the ICIS-NPDES database. Monthly, the contactor shall extract the relevant permit information from the ICIS-NPDES database and update the NPST data.

- The contractor shall collect from the SWRCB and/or RWQCB permit scheduling event dates including; planned issuance date, and public comments due date for entry to NPST.

- This NPDES Permit Tracking System (NPTS) shall contain at a minimum: permit/document received date, permit/document coding date, and an email notification to EPA and SWRCB of coding completion. NPTS will be made available to EPA Region 9, SWRCB and RWQCBs at all times during the performance of assigned tasks.

The contractor shall assume 120 NPDES permits (60 major and 60 minor) will be provided for data extraction.

TASK A-3: Permit Coding Training

The contractor shall work closely with EPA and SWRCB to develop training workshop and training materials for State staff regarding permit coding/data entry to ICIS-NPDES. Contractor shall work with EPA, SWRCB and RWQCB staff to schedule the training to maximize staff participation. Contractor shall provide training to participants, assume 3-4 days for training course held in California between January and July 2018.

The contractor will develop and propose training agenda and guidance materials on permit coding.

Primary topic is NPDES permit coding which entails reviewing and understanding final permits and then coding/entering information into ICIS database to fulfill NPDES program requirements. Training agenda and materials shall be thorough and comprehensive to ensure State staff will be able to code NPDES permits themselves. Preferably, training course will include hands-on exercise in reviewing a permit and performing permit coding into ICIS database. Schedule shall include sufficient time for EPA and SWRCB to review and provide comments to the contractor on the proposed agenda and contents prior to contractor delivering the training course.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task A-3 permit coding training.

DELIVERABLES REQUIRED AND SCHEDULE – DATA ENTRY

Deliverables: The contractor shall reflect a thorough understanding of national and State statutes, regulations, court rulings, policy and guidance. Final deliverables shall be consistent with the acceptance criteria described above, and will reflect any comments from EPA. Additionally, all final deliverables shall be of superior editorial quality. The contractor shall provide quality assurance reporting as specifically identified by the EPA Work Assignment Contracting Officer's Representative (WACOR).

Deliverable Description	Delivery Date
Task A-1	
NPDES permit number and application/NOI received, permit issuance, effective, and expiration dates entered into ICIS-NPDES	Within 7 days following receipt of permit document from SWRCB, RWQCB, or EPA WACOR.
Permitted features, permit limits, and monitoring requirements, extracted and entered into ICIS-NPDES.	Within 30 days following receipt of permit, amendment or modification from SWRCB, RWQCB, or EPA WACOR.
Enforcement actions and associated limits extracted and entered into ICIS-NPDES.	Within 30 days following receipt of enforcement document from SWRCB, RWQCB, or EPA WACOR.
Pending Permits report generated and provided to EPA WACOR.	One week prior to beginning of month.
Reissuance of pending permits finalized in ICIS-NPDES.	On effective date of permit or first business day following effective date.
Task A-2	
Permit Status Tracking Report of NPDES individual, MS4, and general permits with issuance scheduling status, updated with ICIS-NPDES event and state scheduling event dates.	Updated within first 7 days of each month.
NPDES permit number, application, public notice, permit issuance, effective, and expiration dates entered into ICIS-NPDES and synchronized with data in NPST.	Within 7 days following receipt of application/NOI and public notice date information, or permit document from SWRCB, RWQCB, or EPA WACOR.
Permit scheduling event dates for: planned issuance date and public comments due date for entry to NPST.	Updated within first 7 days of month for the Permit Status Tracking Report with information from SWRCB and/or RWQCB.

Task A-3	
Schedule for training task	Within 2 months of the SWRCB request, the contractor shall provide final schedule for training task.
Training course agenda and materials (draft and final)	Training agenda and materials should be submitted to EPA and SWRCB with sufficient time for review and revisions prior to training course.
Training course (approx. 3-4 days; presented in California)	Training course should be accomplished within the second to third quarter of the Federal fiscal year. (January-June 2018)

The Contractor shall notify the CO and EPA WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task A and all sub-tasks therein is approximately 1872 hrs. The contractor may assume one (1) travel trips for all sub-tasks associated within Task A.

Task B: Pretreatment Support

Task B-1: Pretreatment Project Management

1.A. Project Administration: The contractor's responsibilities shall include regular coordination with the WACOR, the State Water Resources Control Board (SWRCB), and relevant Regional Water Boards to ensure preparation of pretreatment inspections and reviews which are compliant with state and federal law, on a schedule which meets the needs of these Water Boards.

1.A.1. Kick-off Meeting: An initial kick-off meeting for the contractor to meet with the WACOR and SWRCB oversight team. The objective of the kickoff is to provide a review of scope of pretreatment inspection tasks for the year which may be assigned to the contractor. This meeting may take place in person or via video- or teleconference. The agenda and meeting notes shall be prepared by the contractor, and the agenda shall identify any information the contractor will need to receive from EPA or the SWRCB to begin work. The draft agenda shall be submitted to the WACOR at least three days prior to the meeting.

1.A.2. Coordination and Planning: The contractor shall be available for routine communication, planning and coordination with the WACOR and EPA Technical Expert, on California statewide and discharger-specific pretreatment issues. The contractor shall confirm in writing any significant decisions or agreements made during these interactions. These interactions will take place at least once a month (possibly as part of the Monthly Update Calls, see next), or as needed during normal business hours, via telephone, email, skype, video conferencing or in person.

1.A.3. Monthly Update Calls: The contractor shall participate in update calls, to be held on a frequency not less than monthly, with the WACOR and the EPA Technical Expert to detail progress on each active work project (pretreatment inspection, report, or training), to identify and correct problems, and provide feedback on pretreatment issues in individual areas. These calls shall be structured as an item-by-item review of the Progress Report and associated Tracking Spreadsheet.

1.A.4. Maintenance of Inspector Credentials: As conducting on-site pretreatment inspections requires appropriate credentialing as EPA-affiliated inspectors, all contractor personnel assigned to perform such inspections shall maintain valid inspector credentials for the

duration of the period of performance.

1.B. Tracking and Reporting: The contractor shall ensure EPA and the SWRCB remain fully informed about the contractor's activities, and approve of those activities, through the following measures:

1.B.1. Tracking of progress on pretreatment inspections and report issuance: The contractor is required to track each pretreatment inspection report during the development process. The contractor shall maintain an up-to-date record of progress on all work assigned, including projected draft, review, correction and submission dates, in an electronic tabular format (hereafter referred to as the "Tracking Spreadsheet") based on the provided example. This information, particularly changes in target dates, will be shared with the WACOR during the monthly update calls and as part of the monthly progress reports, both described below. The contractor is required to submit the report electronically in a table format that includes each of the specific projected dates above, as well as timelines for completion of all final pretreatment report packages.

1.B.2. Monthly Progress Reports: The contractor shall prepare and submit a report on pretreatment-inspection progress during a given month, by the 10th day of the following month. This Progress Report shall be sent to the WACOR and the designated contact at the SWRCB, and shall take the form of an E-mail or similar communication enabling sharing of digital files. The Report shall contain a separate section on work in each Regional Water Board, and shall discuss in writing any changes in target dates, the grounds for those changes, and major issues encountered, with special emphasis on any issues affecting more than one Regional Board. Attached to the E-mail and integral to the Progress Report shall be a copy of the most recent version of the Tracking Spreadsheet. Projected dates which have changed since the previous Monthly Progress Report shall be highlighted in the spreadsheet.

1.B.3. Itemized Invoicing: Each monthly invoice to EPA shall include a list, itemized by Regional Water Board, of all pretreatment inspections and reports worked on for each regional board in the preceding month and the status of each inspection and/or report as of the date of the invoice.

1.B.4. Submission Requirements: Tracking Spreadsheets, Monthly Progress Reports, and other significant communications or submissions of deliverables shall be sent by E-mail to the WACOR with CCs to the EPA Technical Expert. Documents shall be in either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

Task B-2: Pretreatment Program Audits

The contractor shall support EPA Region 9 in conducting on-site pretreatment program audits (PCAs) and submitting written audit reports on the findings, as listed below.

Pretreatment Program Audits to be conducted: 9

In preparation for each audit, EPA Region 9 or the State will furnish the contractor with all applicable background documents (e.g., permit and fact sheet, latest annual report, and prior audit or inspection reports) for each POTW pretreatment program. The contractor shall assume that generally two days on-site will be required for each audit. The contractor shall schedule field work in a manner that efficiently uses travel resources. The contractor shall enter these activities into ICIS within 10 days of field activities.

1.A. Conduct Pretreatment Compliance Audits (PCAs): The contractor shall conduct PCAs at the facilities specified by the WACOR, in accordance with the EPA audit guidance manual entitled Pretreatment Compliance Inspection and Audit Manual for Approval Authorities (EPA 833/B-86-100, July 1986). Audits shall be scheduled based on input from the State and the WACOR.

1.B. Prepare PCA Reports: The contractor shall prepare written reports for each PCA conducted. The report format is specified in the Audit Manual listed above. Each audit shall include: 1. an assessment of the extent to which each POTW under the local pretreatment program is complying with federal pretreatment regulations, their approved pretreatment programs, and requirements specified in their permit(s); 2. an assessment of industrial users regulated by the POTW to determine compliance with pretreatment requirements; and 3. an assessment of the POTW's status regarding the items in Appendix A titled "Pretreatment Audit and Inspection Focus Topics."

Task B-3: Pretreatment Program Inspections

The contractor shall support EPA Region 9 in conducting on-site Pretreatment Compliance Inspections (PCIs) and submitting written reports on the findings, as listed below.

Pretreatment Program Inspections to be conducted: 23

In preparation for each inspection, EPA Region 9 or the State will furnish the Contractor with all applicable background documents (e.g., permit and fact sheet, latest annual report, and prior audit or inspection reports) for each POTW pretreatment program. The contractor shall assume that generally one day on-site will be required for each inspection. The contractor shall schedule field work in a manner that efficiently uses travel resources. The contractor shall enter these activities into ICIS within 10 days of field activities.

1.A. Conduct Pretreatment Compliance Inspections (PCIs): The contractor shall conduct PCIs at the facilities specified by the WACOR, in accordance with the EPA audit guidance manual entitled Pretreatment Compliance Inspection and Audit Manual for Approval Authorities (EPA 833/B-86-100, July 1986). Audits shall be scheduled based on input from the State and the WACOR.

1.B. Prepare PCI Reports: The contractor shall prepare written reports for each PCA conducted. The report format is specified in the Audit Manual listed above. Each audit shall include: 1. an assessment of the extent to which each POTW is complying with federal pretreatment regulations, their approved pretreatment programs, and requirements specified in their permit(s); 2. an assessment of industrial users regulated by the POTW to determine compliance with pretreatment requirements; and 3. an assessment of the POTW's status regarding the items in Appendix A titled "Pretreatment Audit and Inspection Focus Topics."

Task B-4: Pretreatment Evaluations of Individual Program Components

The contractor shall support EPA Region 9 by evaluating new or revised components of local pretreatment programs as listed below. Such components are:

- Ordinances;
- Local limits development studies;
- Enforcement response plans; or
- Multijurisdictional agreements

The need for these evaluations is created by many circumstances including new local program development, reissuance of a municipality's NPDES permit, or a pretreatment program's adoption of the National pretreatment streamlining regulation changes. In performing these evaluations, the contractor

shall generally follow U.S. EPA's model ordinance, local limits guidance document, streamlining implementation guidance, and other applicable EPA guidance. EPA Region 9 or the State will furnish the contractor with all applicable background documents. The ordinance reviews envisioned under this task are substantial efforts frequently associated with new program development or streamlining adoption. The evaluation of ordinance changes that are limited to changes to reflect new local limits is included as part of the evaluation of local limits development studies. EPA Region 9 expects that travel will not be necessary to perform work under this task.

Task B-5: Pretreatment Evaluations of Full Program Submittals

The contractor shall support EPA Region 9 by evaluating new or revised full pretreatment program submittals as listed below. Such evaluations will include all aspects of a pretreatment program. The need for these evaluations is created by many circumstances including new local program development, reissuance of a municipality's NPDES permit, or extensive pretreatment program modifications. In performing these evaluations, the contractor shall generally follow U.S. EPA's model ordinance, local limits guidance document, streamlining implementation guidance, and other applicable EPA guidance. EPA Region 9 or the State will furnish the contractor with all applicable background documents. EPA Region 9 expects that travel will not be necessary to perform work under this task.

Task B-6: Pretreatment Training Sessions

The contractor shall support EPA Region 9 by providing pretreatment training to State personnel and/or local pretreatment operators. There shall be two (2) one-day trainings at a time and location determined by the State or Regional Water Board and communicated via technical direction from the WACOR. Specific pretreatment training details will be provided to the contractor in consultation with the State and Regional Water Boards via technical direction from the WACOR.

The contractor shall provide an electronic version of Course Materials, consisting of PDFs of each module of the pretreatment training class. The contractor shall provide assistance to EPA and California to develop associated materials, worksheets and sample problems.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task B as appropriate.

DELIVERABLES REQUIRED AND SCHEDULE – PRETREATMENT

Based on Regional Water Board requirements and applicable formats and/or language, the contractor shall conduct the pretreatment audits/inspections/program reviews and prepare inspection reports, including all materials and documents used in permit development) for each facility assigned. These draft documents shall be provided to appropriate EPA staff (the WACOR and the regional pretreatment coordinator) and State staff for review and comment, as arranged through the WACOR. Individual deliverable due dates shall be agreed with the relevant Regional Water Board, with concurrence by SWRCB and EPA.

Documents shall be submitted by E-mail to the relevant Regional Water Board pretreatment contact with a CC to the WACOR, in either .DOC or .PDF file formats and shall be accessible, functional and free from computer viruses or other technology problems.

The duplication of more than 5,000 copies of a single page or 25,000 or more total impressions is considered "printing" and, therefore, prohibited. For more information on restrictions relating to deliverables, the contractor is referred to the EPA Publication Management Guide (EPA-175-K-92-011).

The Contractor shall notify the CO and EPA WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

SUMMARY OF DELIVERABLES AND DUE DATES			
Task/Subtask	Deliverable	Distribution	Due Dates*
Task 1.A.1	Kickoff Meeting Agenda	EPA WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Within 2 weeks of award
Task 1.A.1	Kickoff Meeting Summary	EPA WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Within 3 weeks of award, and no later than September 30 2017.
Task 1.B.1	Tracking Spreadsheet	EPA WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Initial version within 2 weeks of first Technical Directive identifying permits for contractor support, then updated as new dates and information are received
Task 1.B.2	Monthly Progress Report	EPA WACOR, EPA pretreatment coordinator SWRCB pretreatment liaison	By 10th day of each calendar month, for activities during the preceding calendar month.
Task 1.A.3	Monthly Update Call Follow-up	EPA WACOR, SWRCB pretreatment liaison	Monthly after submission of Monthly Progress Reports, on a schedule to be agreed with the SWRCB.
Task 2	Pretreatment Compliance Audit (PCA) report	EPA pretreatment coordinator, EPA WACOR, assigned Regional Water Board pretreatment liaison, SWRCB pretreatment liaison	All field activities and ICIS entries by July 31, 2018, all draft reports by August 31, 2018, all final reports within 15 days of receipt of comments and no later than Sept 30 2018. Specific schedules to be set by Technical Directive as individual dischargers are identified for audits.
Task 3	Pretreatment Compliance Inspection (PCI) report		
Task 4	Pretreatment program component review		
Task 5	Full Pretreatment program		

	review		
Task 6	Pretreatment Training	EPA pretreatment coordinator, SWRCB pretreatment liaison	As scheduled with SWRCB, no later than July 30 2018.

*Note: All days are calendar days unless otherwise specified.

The Contractor shall notify the CO and EPA WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task B and all sub-tasks therein is approximately 2695 hrs.
The contractor can assume twelve (12) travel trips for all sub-tasks associated within Task B.

Task C: Permit Writing

Task C-1: Permit Writing - Project Management

C-1-1 Project Administration: The contractor's responsibilities shall include regular coordination with the WACOR, the State Water Resources Control Board (SWRCB), and relevant Regional Water Boards to ensure preparation of permit drafts which are compliant with state and federal law, on a schedule which meets the needs of these Water Boards.

a. **Kick-off Meeting:** An initial kick-off meeting for the contractor to meet with the WACOR and SWRCB oversight team. The objective of the kickoff is to provide a review of scope of permit writing tasks for the year which may be assigned to the contractor. This meeting may take place in person or via video- or teleconference. The agenda and meeting notes shall be prepared by the contractor, and the agenda shall identify any information the contractor will need to receive from EPA or the SWRCB to begin work. The draft agenda shall be submitted to the WACOR at least three days prior to the meeting.
b. **Coordination and Planning:** The contractor shall be available for routine communication, planning and coordination with the WACOR on California NPDES permit writing needs. The contractor shall confirm in writing any significant decisions or agreements made during these interactions. These interactions will take place at least once a month (possibly as part of the Monthly Update Calls, see next), or as needed during normal business hours, via telephone, email, skype, video conferencing or in person.
c. **Monthly Update Calls:** The contractor shall participate in update calls, to be held on a frequency not less than monthly, with the WACOR and the SWRCB to detail progress on each active work project (permit), to identify and correct problems, and provide feedback on permitting issues in individual areas. These calls shall be structured as an item-by-item review of the Progress Report and associated Tracking Spreadsheet.

C-1-2 Tracking and Reporting: The contractor shall ensure EPA and the SWRCB remain fully informed about the contractor's activities, and approve of those activities, through the following measures:

d. **Tracking of progress on permit issuance:** The contractor is required to track each permit during the NPDES permit development process. The contractor shall maintain an up-to-date record of progress on all work assigned, including projected draft, review, correction and submission dates, in an electronic tabular format (hereafter referred to as the "Tracking Spreadsheet") based on the

provided example. This information, particularly changes in target dates, will be shared with the WACOR during the monthly update calls and as part of the monthly progress reports, both described below. The contractor is required to submit the report electronically in a table format that includes each of the specific projected dates above, as well as timelines for completion of all final permit packages.

f. **Monthly Progress Reports:** The contractor shall prepare and submit a report on permit-writing progress during a given month, by the 10th day of the following month. This Progress Report shall be sent to the WACOR and the designated contact at the SWRCB, and shall take the form of an E-mail or similar communication enabling sharing of digital files. The Report shall contain a separate section on work in each Regional Water Board, and shall discuss in writing any changes in target dates, the grounds for those changes, and major issues encountered, with special emphasis on any issues affecting more than one Regional Board. Attached to the E-mail and integral to the Progress Report shall be a copy of the most recent version of the Tracking Spreadsheet. Projected dates which have changed since the previous Monthly Progress Report shall be highlighted in the spreadsheet.

g. **Itemized Invoicing:** Each monthly invoice to EPA shall include a list, itemized by Regional Water Board, of all permits worked on for each regional board in the preceding month and the status of that permit as of the date of the invoice.

h. **Submission Requirements:** Tracking Spreadsheets, Monthly Progress Reports, and other significant communications or submissions of deliverables shall be sent by E-mail to the WACOR with CCs to the SWRCB contact and relevant Regional Water Board permit contact. Documents shall be in either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

Task C-2: Permit Writing - Draft and Final Permit Packages and Administrative Records

The contractor shall prepare draft permit packages for each facility assigned. Specific permits will be identified by the EPA Work Assignment Contracting Officer's Representative (WACOR) on a regular basis, at minimum quarterly, and provided to the contractor in writing. Correspondence shall primarily be in electronic form. Each permit package shall be consistent with applicable Federal and California regulations and guidance and also conform to California's style and formatting practices as directed in the permit templates supplied by the State Water Board, and local variations thereon supplied by the Regional Water Board(s).

The contractor may be asked to provide the following services:

- Review data that has been provided by EPA Region 9, the state, tribes, and/or the discharger as part of the permit application process;
- Identify, collect, and review any additional background data for each facility to be permitted and the affected receiving water needed to properly evaluate the need for permit limitations and conditions;
- Prepare a draft permit and supporting documentation for each facility assigned. These draft documents shall be provided to EPA Region 9, and other appropriate parties, for review and comment. Afterwards the contractor shall incorporate and address those comments and submit a permit package for the Regional Water Board to adopt and conduct public notice on. The final drafted products shall also be provided to EPA and the SWRCB at the same time they are sent to the relevant Regional Water Board.

- For certain permits in the higher-tier support groups, as identified by the Regional Water Boards, the contractor may be required to support development of materials for the formal board meeting at which the permit is presented, and/or responses to public comments on the contractor-drafted permit after it is put out for public notice.

Permit packages shall be categorized into one of the following groups, based on the contractor activities requested by the Regional Water Board as listed in Table 1 below:

***Task C-2-a**: Permit Writing Group I* (34 permits requested at this level of support)

- Contractor activities 1, 2, 3, and 7, plus any one of the following contractor activities: 4, 5, 6, 8, or 9.

***Task C-2-b**: Permit Writing Group II* (9 permits requested at this level of support)

- Contractor activities 1, 2, 3, and 7, plus any two of the following contractor activities: 4, 5, 6, 8, and/or 9.
- General permit renewals with fewer than 20 enrollees will be assigned this level of support.

***Task C-2-c**: Permit Writing Group III* (3) permits requested at this level of support)

- Contractor activities 1, 2, 3, and 7, plus any three or more of the following contractor activities: 4, 5, 6, 8, and/or 9.
- General permit renewals with 20 or more enrollees and new general permits will be assigned this level of support.

If a permit package cannot be precisely categorized into a group based on the above criteria, it shall be classified by the WACOR based on best professional judgment. The total number of permits assigned will not exceed **35** Group I permits, **10** Group II permits, and **3** Group III permits.

The following is the suggested process and timeframe for providing NPDES permit support to Regional Water Boards in California. The process may need to be adjusted based on the specific schedules and procedures established by the EPA WACOR and the particular Regional Water Board. For each Regional Water Board, the contractor shall identify a single point of contact.

The documents shall be in either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task C-2 permit writing and development.

Table C. Contractor Activity Descriptions and Suggested Delivery Timeframes

No.	Activity Description	Suggested Timeframe
1	Review/Copy Files • The contractor shall assign staff to review and obtain copies of all permit file information necessary for permit development (e.g., applications, monitoring data, compliance and enforcement correspondence). Use of electronic documents where possible, to conserve resources, is encouraged.	Within 2 weeks after permit assignment by EPA WACOR

No.	Activity Description	Suggested Timeframe
	• The contractor shall coordinate with the EPA WACOR and the Regional Water Board regarding when contractor staff are scheduled for on-site visits for data collection prior to contractor staff arriving at the Regional Water Board.	
2	Collect Additional Data and Information (as necessary) • The contractor shall be authorized to contact the facility directly if additional data or information is required to initiate permit development. Any correspondence between the facility and the contractor shall be documented for the contract file and Regional Water Board administrative file as deemed necessary (e.g., new data submittal). Perform Pre-Permit Site Visit (as necessary) • As time allows, a permit site-visit <u>may</u> be performed to observe facility operations, outfall conditions, etc. • When feasible, a permit site visit shall be coordinated with planned compliance evaluation inspections (CEIs). • EPA and Regional Water Board facility contacts shall be notified of all permit site visits prior to the visit. At EPA and Regional Water Board discretion, their staff may accompany contractor staff.	Within 4 weeks after permit assignment
3	Complete Draft Reasonable Potential Analysis (RPA) and develop draft Water Quality-Based Effluent Limits (WQBELs) • Based on review of Report of Waste Discharge (ROWD) or applications, identify permitting policy issues (if any) for discussion with Regional Water Board. As necessary, discuss with Regional Water Board to reach resolution. • Based on data and information collected, a draft RPA and draft WQBELs (if necessary) shall be calculated, summarized, and provided to the Regional Water Board contact for review and comment. • As necessary, the contractor shall participate in meetings and phone calls with the Regional Water Board to discuss any site-specific situations where guidance is needed regarding the approach to be taken for preparing draft permits. • When transmitting the draft RPA and WQBELs to the Regional Water Board, any unique or potentially controversial issues shall be highlighted to facilitate review. • Subsequent to delivery of the draft RPA and WQBELs, the contractor shall schedule a conference call or meeting with EPA and the Regional Water Board to describe the approach taken, data issues (if any), and discuss any unique discharge situations. • The draft RPA and WQBEL documents shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA WACOR and liaison, and the appropriate Regional Water Board Manager and/or Senior.	
	Receive Regional Water Board Comments on Draft RPA and WQBELs	Within 1 week after receipt

No.	Activity Description	Suggested Timeframe
4	Prepare Issue Paper • The Issue Paper shall highlight any unique issues or permit conditions in order to facilitate review by the RB. • The Issue Paper may be accompanied by a draft Fact Sheet and/or draft Monitoring and Reporting Program. • The format and guidance to be followed shall be the most recent version of the RB permit template and matrix.	
	Receive Regional Water Board Comments on Issue Paper	Within 2 weeks after receipt
5	Prepare and Deliver Administrative Draft Order/NPDES Permit Package • Based on comments from EPA and the Regional Water Board, revisions to the draft RPA and WQBELs shall be made as necessary. • Administrative Draft Order/NPDES Permit Package includes Cover Page, Limitations and Discharge Requirements, Attachments A through G of the permit template, and a draft cover letter to transmit the administrative draft to the facility. • As necessary, and prior to delivery of the draft, the contractor shall contact the Regional Water Board to discuss any site-specific situations where direction is needed regarding the approach to be taken in the Order/permit. • As necessary, a draft Time Schedule Order or Cease and Desist Order shall be prepared for those pollutants for which compliance schedules are not allowed in the Order (those based on Basin Plan water quality objectives). • In order to facilitate review by EPA and the Regional Water Board, any unique issues or permit conditions shall be highlighted in the Administrative Draft Order/NPDES Permit Package. • The Administrative Draft Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Senior (as applicable). • Subsequent to delivery of the Administrative Draft Order/NPDES Permit Package, the contractor shall schedule a conference call (as needed) or meeting with EPA and the Regional Water Board contact to walk through the approach taken for developing requirements and provisions, and discuss any other potentially controversial issues related to the draft order/permit package. [Note: if no comments are provided on the administrative draft Order/NPDES permit package, the draft shall be considered the final administrative draft Order/NPDES permit package.]	Within 2 weeks following receipt of comments from EPA and the Regional Water Board on draft RPA and WQBELs
	Receive Regional Water Board comments on Administrative Draft	Within 1 week after receipt
6	Incorporate Regional Water Board Comments on the Administrative Draft Order/NPDES Permit Package (as necessary), and Prepare and Deliver the Final Administrative Draft Order/NPDES Permit Package	Within 1 week after receipt of comments from EPA and Regional Water

No.	Activity Description	Suggested Timeframe
	• Based on comments from EPA and the Regional Water Board, revisions to the administrative draft Order/NPDES permit package shall be made. • If necessary, a final administrative draft Order/NPDES permit package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to the appropriate Regional Water Board Manager and/or Senior.	Board
7	Prepare and Deliver the Tentative Draft Order/NPDES Permit Package • Address any comments received by EPA and the Regional Water Board on the draft RPA and WQBELs or Final Administrative Draft Order/NPDES Permit Package. • Make any final changes/edit/etc., and prepare the Tentative Draft Order/NPDES Permit Package. • The Tentative Draft Order/NPDES Permit Package shall include all components of the administrative draft permit record, including application and supporting data, tentative draft Order/NPDES permit, documents or other items cited in tentative draft Order/NPDES permit, and any other items supporting permit development • Prepare public notice materials to transmit the Tentative Draft Order/NPDES Permit Package (transmittal letter for facility and interested parties, Notice of Public Hearing, letter to newspaper for public advertising, etc.). Formats for the public notice materials to be provided by the Regional Water Board. • The Tentative Draft Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Manager and/or Senior Engineer. • Subsequent to delivery of the Tentative Draft Order/NPDES permit package, the contractor shall schedule a conference call (as needed) or meeting with the Regional Water Board contact to discuss any significant changes or issues related to the tentative draft order/permit.	Within 2 weeks after receipt of comments from EPA and the Regional Water Board
8	Respond to Public Comments on the Tentative Draft Order/NPDES Permit Package and Prepare and Deliver the Final Tentative Draft Order/NPDES Permit Package • Assist Regional Water Board staff with Response to Comments for technical issues related to development of the permit package. • Revisions to the Tentative Draft Order/NPDES Permit Package shall be made to address the public comments received and any additional comments from EPA and the Regional Water Board contact. • A Final Tentative Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Manager and/or Senior.	Within 2 weeks after receipt of comments from EPA and the Regional Water Board

No.	Activity Description	Suggested Timeframe
9	Develop Board Agenda Materials • Based on formats to be provided by the Regional Water Board, the contractor shall prepare materials to be used by the Regional Water Board contact for use at the Board meeting.	To be delivered concurrently with the response to comments and Final Tentative Draft Order

Specific permitting tasks will be identified by the State and Regional Water Boards and assigned to the contractor by the EPA WACOR in writing, on not less than a quarterly basis, as indicated above.

DELIVERABLES REQUIRED AND SCHEDULE – PERMIT WRITING

Based on Regional Water Board requirements and applicable formats and/or language, the contractor shall conduct the pretreatment audits/inspections/program reviews and prepare inspection reports, including all materials and documents used in permit development) for each facility assigned. These draft documents shall be provided to appropriate EPA staff (the WACOR and the regional pretreatment coordinator) and State staff for review and comment, as arranged through the WACOR. Individual deliverable due dates shall be agreed with the relevant Regional Water Board, with concurrence by SWRCB and EPA.

Documents shall be submitted by E-mail to the relevant Regional Water Board pretreatment contact with a CC to the WACOR, in either .DOC or .PDF file formats and shall be accessible, functional and free from computer viruses or other technology problems.

The duplication of more than 5,000 copies of a single page or 25,000 or more total impressions is considered "printing" and, therefore, prohibited. For more information on restrictions relating to deliverables, the contractor is referred to the EPA Publication Management Guide (EPA-175-K-92-011).

SUMMARY OF DELIVERABLES AND DUE DATES			
Task/Subtask	Deliverable	Distribution	Due Date*
Task C-1-1.a	Kickoff Meeting Agenda	EPA WACOR, SWRCB permitting liaison	Within 2 weeks of award
Task C-1-1.b.	Kickoff Meeting Summary	EPA WACOR, SWRCB permitting liaison	Within 3 weeks of award, and no later than September 30 2016.
Task C-1-1.c	Tracking Spreadsheet	EPA WACOR, SWRCB permitting liaison	Initial version within 2 weeks of first Technical Directive identifying permits for contractor support, then updated as new dates and information are received
Task C-1-1.c	Monthly Progress Report	EPA WACOR, SWRCB permitting liaison	By 10th day of each calendar month, for activities during the

			preceding calendar month.
Task C-1-1.c	Monthly Update Call Follow-up	EPA WACOR, SWRCB permitting liaison	Monthly after submission of Monthly Progress Reports, on a schedule to be agreed with the SWRCB.
Task C-2 (subtasks C-2-a, C-2-b, and C-2-c)	Draft NPDES Permit(s) as individually requested by State & Regional Water Boards	EPA WACOR, assigned Regional Water Board permitting liaison, SWRCB permitting liaison	Schedule for individual permit drafts shall be as assigned in the relevant Technical Directive(s) after contractor reaches agreement with the issuing Regional Water Board.

*Note: All days are calendar days unless otherwise specified.

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task C and all sub-tasks therein is approximately 8872 hrs.
The contractor can assume two (2) travel trips for all sub-tasks associated within Task C.

CONTRACT SOW REFERENCE

See Contract SOW Page 1-10 of 14 ***Task # "Task Title", Page # - # of # Task # Task Name***

ANTICIPATED TRAVEL REQUIREMENTS

All travel shall be approved in advance by the Contract-Level Contracting Officer's Representative (CL-COR) and shall be in accordance with the Contract.

ADDITIONAL REQUIREMENTS

Office direct costs (ODCs) for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this delivery order without the prior written approval of the Contracting Officer.

Upon issuance of written technical direction, the Contractor shall submit for inspection of all work in progress at any time under this work assignment. The Contractor shall develop and maintain files supporting each task.

The contractor shall contact the Contracting Officer (CO) and/or the CL-CCOR by telephone to discuss any problems that may adversely affect the work on this Work Assignment. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO and the PO.

CONTRACTOR IDENTIFICATION

To avoid any perception that contractor personnel are EPA employees, the contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites.

CONTROL REQUIREMENTS

Quality Assurance Project Plan (QAPP):

Publishing on the NPDES website does not require a QAPP, since the people who generate the data are responsible for the data's quality, and it is their responsibility to develop a QAPP, if one is needed for their primary data uses. The contractor shall provide source references for data that is published on the website.

Organizational Conflict of Interest:

The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in FAR Subpart 9.5, or that the contractor has disclosed all such relevant information. See contract clause 1552.209-71 Organization of Conflict of Interest.

Notification of Conflicts of Interest Regarding Personnel:

The Contractor shall immediately notify the CL-COR and the Contracting Officer of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract, or (2) any such conflicts concerning subcontractor employees or consultants working on or having access to information regarding the contract, when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work. See Section H.4, contract clause EPAAR 1552.209-73 Notification of Conflict of Interest.

The contractor shall contact the WACOR and/or the Alternate Work Assignment Contracting Officer's Representative (Alternate WACOR) by telephone to discuss any problems that may adversely affect the work described in the PWS. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be provided via email to the WACOR with a copy to the Alternate WACOR and Contracting Officer.

Enforcement Sensitive Information:

The contractor recognizes that contractor employees in performing tasks specified in the PWS may have access to data/information, either provided by the government or first generated during contract performance, of enforcement sensitive nature which should not be released to the public without Environmental Protection Agency (EPA) approval. Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel, including but not limited to, subcontractor and consultant personnel assigned to work on this contract and/or task order, or with access to materials developed pursuant to such efforts, understand that this information is confidential and any disclosure or misuse of

the information may result in prosecution to the fullest extent of the law. All contractor personnel are expected to exercise due diligence in safeguarding, handling or disposing of any such information.

Project Employee Confidentiality Agreement

The contractor agrees that the contractor employee will not disclose, either in whole or in part, to any entity external to the EPA, the Department of Justice, or the contractor, any information or data (as defined in FAR Section 27.401) provided by the government or first generated by the contractor under the work described in the PWS, any site-specific cost information, or any enforcement strategy without first obtaining the written permission of the EPA Work Assignment Contracting Officer's Representative (WACOR). If a contractor, through an employee or otherwise, is subpoenaed to testify or produce documents, which could result in such disclosure, the contractor must provide immediate advance notification to the EPA so that the EPA can take action to prevent such disclosure. Such agreements shall be effective for the life and for a period of five (5) years after completion of all work described in the PWS.

Handling of Confidential Business Information (CBI)

Contractor's access to TSCA CBI must comply with the procedures set forth in the TSCA CBI Security Manual. Likewise, access to FIFRA CBI shall follow the security procedures set forth in the FIFRA Information Security Manual.

To the extent that the work described in the PWS requires access to proprietary or confidential business or financial data of other companies, and as long as such data remains proprietary or confidential, the contractor shall protect such data from unauthorized use and disclosure.

All files or other information identified as Confidential Business Information (CBI) shall be treated as confidential and kept in a secure area with access limited to only contractor personnel directly involved in the case or special project assignment. The contractor, subcontractor, and consultant personnel are bound by the requirements and sanctions contained in their contracts with the EPA and in EPA's confidentiality regulations found at 40 CFR Part 2, Subpart B. The contractor subcontractors, and consultant must adhere to EPA-approved security plans which describes procedures to protect CBI, and are required to sign non-disclosure agreements before gaining access to CBI.

All official data, findings, and results of investigations and studies completed by the contractor shall be available for EPA and DOJ internal use only. The contractor shall not release any part of such data without the written direction of the EPA WACOR.

Conferences and Workshops:

The tasks under this work assignment may require the acquisition of "off-site" facilities for conference(s) and meetings as defined in the IPN 12-05. AND the events associated with this work assignment are covered by EPA Order 1900.3 and do require EPA Form 5170.

The contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated $20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

Any event which meets the definition of a "conference," with total net expenditures greater than $20,000,

is required to submit EPA Electronic Form 5170 and Form 5170-A (with cost estimates/actuals). In the case the workflow system is down and WACORs require emergency approval, they can submit EPA Form 5170 (PDF) (2pp, 93K) (with cost estimates) to conference@epa.gov.

PERFORMANCE SURVEILLANCE PLAN

Data entry and data management shall be conducted in accordance with the procedures outlined in the 1992 Permit Compliance System (PCS) Quality Assurance Guidance Manual, and follow the 2015 Final NPDES electronic reporting rule and Appendix A of the 40 CFR 127 electronic rule. The contractor shall also follow EPA and ICIS information security guidance described in the *ICIS Rules of Behavior.*

https://www.epa.gov/compliance/permit-compliance-system-pcs-quality-assurance-guidance-manual

https://www.epa.gov/compliance/final-national-pollutant-discharge-elimination-system-npdes-electronic-reporting-rule

Task A-1

Requirement	Standard	Acceptable Quality Level
The contractor shall collect all updated permit information, including adoptions, reissuances, recessions, amendments, and modifications of permits, enforcement actions, Time Schedule Orders, and Compliance Schedule Orders.	Data is received from nine California regional boards. The contractor shall review all data and research any discrepancies.	The contractor shall thoroughly review the permit document within 7 days of receipt. All updates and corrections are to be made in ICIS-NPDES.
The contractor shall enter and update permit limits as they are adopted, reissued, rescinded, modified, or amended.	The contractor shall follow the permit coding as it is written in the permit. Clarification to any coding issues shall be researched. For unclear information, the contractor shall seek solutions and/or contact the permit writer.	Within 30 days, the contractor shall have reviewed and updated all required permit coding in ICIS-NPDES. The contractor shall ensure all data is clear, correct and complete.
The contractor shall provide monthly summaries of coded permits pending issuance in ICIS-NPDES.	Permit status information is stored in ICIS-NPDES. The contractor shall review all information and correct or highlight any inconsistencies.	The summary report shall indicate pending permits, becoming effective in upcoming months and shall be provided to EPA WACOR.
The contractor shall review the Quarterly Noncompliance Report (QNCR) and provide corrections on any Significant Non-compliance data.	The contractor shall assist the SWRCB in updating ICIS-NPDES as needed to resolve violations identified in the NNCR.	The final report shall indicate all changes and corrections made to the data to be acceptable by EPA.
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry will follow guidance provided within SWRCB QAPrP.

Task A-2

Requirement	Standard	Acceptable Quality Level
The contractor shall maintain the NPDES Permit Status Tracking List (NPST) by entering updated information for all planned permits.	The contractor shall receive and review NPDES permit application, public notice, public comment period, permit issuance, permit effective, and permit expiration dates for all permittees.	NPST shall include 100% of data to provide the contractor with updated reports on permit status including reissuance dates, and all effective and expiration dates. This shall help assess workload for future fiscal years.
The contractor shall maintain the Status Tracking to stay on top of all permit activities.	Contractor shall update tracking system as new activities are documented. Contractor shall provide report on tracking system as requested by the WACOR.	All Permit Status Tracking Reports submitted to the WACOR shall be in an excel spreadsheet to include the most current information for each individual permit.

Task A-3

Requirement	Standard	Acceptable Quality Level
The contractor shall provide training in permit coding as requested by the State Waterboard.	Contractor shall provide guidance document and sample permit coding from simplistic to complex coding.	The training shall ensure all permit coding is clear and understandable by State and Regional board staff. Should there be any questionable coding issues, the contractor will be available to assist and answer questions.
Contractor shall coordinate with EPA and SWRCB to prepare a schedule with interim milestones to complete this task. This includes coordination with EPA and SWRCB to schedule the training course dates.	Schedule shall be comprehensive and well organized to accommodate milestones and time needed to complete task and sub-tasks. Schedule shall indicate training course will occur 2nd or 3rd quarter of federal FY18.	The schedule is clear and concise and accurately reflects the work to be completed. The contractor shall alert EPA and SWRCB of significant schedule changes within 5 business days. Should there be any questionable coding issues, the contractor will be available to assist and answer questions.
Contractor shall develop, review and finalize training course agenda and materials for State permit staff. Draft materials shall be reviewed by EPA and SWRCB for approval prior to training course. If other training material is	-Training materials shall be comprehensive regarding specific permit content to be included in ICIS database. -Information contained within the training materials shall be of sufficient detail and quality to ensure State staff are prepared review permits and accurately code/enter required info into ICIS database.	Training agenda and materials are submitted in accordance with the schedule developed for this task. Training materials are presented in clear, concise and accurate with no more than 5 minor errors in content, spelling and grammar. The training shall ensure all permit coding is clear and

Requirement	Standard	Acceptable Quality Level
available to support the training, it should be made available to SWRCB.	-The course agenda and materials shall be complete and concise, including step-by-step process on how permit coding is done, demonstrate examples and clear comprehension of basic to complex permit coding. -The contractor shall respond to comments from EPA and SWRCB and make any revisions as needed or directed by EPA.	understandable by State staff. The contractor shall respond to comments from EPA and SWRCB and make any revisions within 5 business days as needed. EPA and SWRCB will review agenda and materials, provide feedback and return to contractor with comments at least 2 weeks prior to training course.
Contractor shall deliver training to EPA and State staff to implement NPDES permit coding requirements. Assume 3-4 day training workshop in California.	-Contractor shall provide final training course agenda and materials to EPA and SWRCB so these materials can be provided by either EPA or SWRCB to State staff in advance of training course dates. -The contractor shall conduct the training course in a clear, concise, and accurate manner, answering questions during the training course. -The contractor shall highlight information and/or ideas from the training materials that pertain to coding NPDES permits. -The contractor shall augment course with permit examples and practice sessions into ICIS. -The contractor shall conduct a brief course evaluation at the end of the training course.	Training course ensure all permit coding is clear and understandable by SWRCB and RWQCB staff. Contractor provides at least one instructor to teach the training to State staff. At least 75% of participants who submit course evaluations report that the training meaningfully increased their understanding of NPDES permit coding into ICIS database.
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry and coding training.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry and permit coding training will follow and/or include guidance provided within SWRCB QAPrP.

Task B-1

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
B.1 Kick-off Meeting: The Contractor shall conduct a kick-off meeting and prepare the	○ Kick-off meeting shall be coordinated with all parties in a timely manner. ○ Agenda topics shall include all	▪ The kick-off meeting is held within 3 weeks of award, and no later than September 30 2016. ▪ The draft agenda is submitted to

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
agenda and meeting summary.	pertinent issues for discussion. o Agenda topics shall be fully addressed during the meeting. o Open issues shall be addressed within 5 days of meeting. O Meeting summary shall be submitted to the WACOR within 5 days of the meeting. O Meeting summary shall appropriately cover topics of discussion including key details and agreements.	the WACOR at least 3 days prior to the meeting. ▪ 90% of all agenda topics are fully addressed during the meeting. ▪ 95% of the agenda and meeting summary shall be accurate, thorough, clear, concise, and free of spelling and grammar errors.
B.2 Coordination and Planning: The contractor shall be available for discussions with the WACOR about pretreatment inspection progress and related topics.	o The contractor shall maintain regular communications with the WACOR, the SWRCB liaison, and the Regional Water Boards' pretreatment liaisons. o The contractor shall notify the WACOR in a timely manner of any issues, concerns or potential schedule changes. o The contractor shall be responsive to WACOR inquiries. o Conversations with the WACOR about progress on pretreatment inspections shall be held not less than monthly (e.g. as part of monthly update calls, below), or as requested by the WACOR. o The contractor shall confirm in writing any significant decisions or agreements. E-mail is an acceptable medium for written confirmations.	▪ The contractor shall contact the WACOR, via telephone or email, at least once each month. ▪ The contractor shall notify the WACOR of any significant issues, concerns or potential schedule impacts within 3 days of identification. ▪ The contractor shall respond to WACOR inquiries or requests within 3 days. ▪ The contractor shall submit documentation of significant decisions or agreements to the WACOR within 3 days of interaction. ▪ 90% of the documentation shall be thorough, accurate, clear, concise and free of spelling or grammar errors.
B.3 Monthly Update Calls: The contractor shall participate in monthly update calls with EPA and the SWRCB.	o Calls shall be held not less than monthly on a schedule agreed to between the WACOR, SWRCB representative, and the Contractor. o Calls shall address the status of every active (assigned but not yet completed) pretreatment inspection being worked on as listed in the Monthly Progress Report.	▪ Call schedules are confirmed by the contractor not less than 1 week in advance. ▪ No monthly update calls are missed except by prior agreement with the WACOR, and calls which are rescheduled take place within 2 weeks of the original date. ▪ 90% of calls shall successfully address all ongoing work listed in

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	○ Contractor shall update the WACOR and SWRCB representative on any open issues, concerns or schedule changes; and shall be responsive to EPA and SWRCB inquiries.	the respective Monthly Progress Report. ▪ Issues which cannot be resolved on the call itself are responded to within 5 business days 90% of the time.
B.4 Maintenance of Inspector Credentials: Contractor personnel assigned to perform pretreatment inspections shall maintain valid inspector credentials	○ All contractor personnel assigned to perform pretreatment inspections shall maintain valid inspector credentials for the duration of the period of performance.	▪ Inspector credentials for each contractor inspector shall be reviewed and confirmed during the Monthly Update Call immediately prior to the scheduled pretreatment inspection.
B.1 Tracking of Progress on Pretreatment Inspection work ("Tracking Spreadsheet"): The contractor shall maintain an accurate record of assigned work and projected interim and final dates.	○ The contractor shall prepare a tracking spreadsheet showing projected dates for the draft, review, correction and submission to Regional Water Boards of each assigned pretreatment inspection (PCI, PCA, program evaluation) and/or pretreatment training session. ○ The contractor shall ensure this spreadsheet remains up to date during performance of the TO. ○ The spreadsheet shall be in .XLS or .XLSX format and based on the template provided	▪ Initial Tracking Spreadsheet shall be crafted within 2 weeks of receiving the first Technical Directive assigning specific pretreatment inspection targets and shall be no less than 95% accurate. ▪ Updates to the Tracking Spreadsheet shall be made within 3 days of new Technical Directives or schedule changes made by the Regional Water Boards, at which point updated copies shall be sent to the WACOR and SWRCB. ▪ Spreadsheet meets the format specified.
B.2 Monthly Progress Reports: The contractor shall prepare and submit a report on pretreatment inspection progress during each month.	○ Inspection status shall be reflected in, and consistent between, the monthly invoices and the monthly progress reports. ○ The monthly progress report document shall concisely and accurately detail current status on each pretreatment inspection, including progress, projected dates, major issues encountered, and upcoming milestones. ○ A report shall be submitted by the 10th day of each calendar month, covering activities during the	▪ There shall be no discrepancies between monthly progress reports and submitted invoices in 95% of cases. ▪ 95% of monthly progress reports shall contain all the required information for assigned pretreatment inspections whose status has changed. ▪ 95% of monthly progress reports are delivered by the 10th-day-of-next-month deadline. ▪ Progress Reports are organized to distinguish between work

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	previous calendar month. ○ The Monthly Progress Report shall distinguish between the Regional Water Boards when reporting work which has been conducted. ○ The progress report shall include an up-to-date version of the Tracking Spreadsheet, with highlighting for any changes made in the previous month to scheduled dates.	performed for each regional board ▪ Progress reports highlight major issues with each pretreatment inspection (if any), particularly issues which affect multiple pretreatment programs or multiple regional water boards. ▪ 95% of included Tracking Spreadsheets have correct highlighting of all changed dates, with notes on the cause of each change.
B.3 Itemized Invoices: Monthly invoices shall identify and distinguish work completed for each Regional Water Board separately.	○ Monthly invoices shall include a list, by Regional Water Board, of all pretreatment inspections worked on in the preceding month and their status as of the date of the invoice.	▪ 100% of invoices are properly itemized in this fashion. 95% of invoices are found to be accurate when compared to which deliverables have been received by the WACOR.
B.4 Submission Requirements: The WACOR and SWRCB shall be copied on all significant submissions of documents, including submission of draft and final pretreatment inspection documents (deliverables) to the Regional Water boards.	○ The WACOR and SWRCB representative shall receive copies of all draft and final pretreatment inspection documents prepared by the contractor at the same time as these deliverables are sent to the relevant Regional Water Board. ○ Documents shall be in either .DOC, .DOCX, or .PDF file formats (for text) or .XLS or .XLSX format (for spreadsheets) ○ Documents shall be accessible, functional and free from computer viruses or other technology problems.	▪ 95% of submissions are appropriately copied to the WACOR and SWRCB representative upon submission, and all other submissions reach the WACOR and SWRCB representative within 3 days of being identified. ▪ 100% of submitted documents conform to the formats listed ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).
QA/QC Plan	If needed develop QA/QC plan for relevant pretreatment inspection reports. Need will be determined as part of kick-off meeting, or as additional pretreatment inspections are assigned.	If needed QA/QC plan must meet standards of EPA QC Section *(EPA QA/R-5).* QA performance shall be in conformance with the *Office of Water Quality Management Plan of 2001.*

Task B-2

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 2.A: Conduct Pretreatment Compliance Audits (PCAs).	Audits shall include assessment of compliance by POTW, assessment of compliance by industrial users discharging to the POTW, and assessment of POTW's status regarding the Pretreatment Audit and Inspection Focus Topics. Audit results shall be entered into ICIS within 10 days of conclusion of field activities / site visit.	Audits cover all required components and follow the procedures outlined in the EPA audit guidance manual (EPA 833/B-86-100, July 1986). ICIS entries are consistently prepared in a timely fashion.
Task 2.B: Prepare Audit Reports and submit to EPA and the State.	Audit reports shall comply with the format specified in the EPA guidance https://www3.epa.gov/npdes/pubs/final_pca_checklist_and_instructions_%20feb2010.pdf and shall be submitted on the schedule agreed to, and documented in, the latest approved tracking spreadsheet.	Not less than 95% of the time, audit reports shall contain all required elements, are technically accurate and professionally written and proofread, and are delivered on the agreed schedule.

Task B-3

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 3.A: Conduct Pretreatment Compliance Inspections (PCIs).	PCIs shall include assessment of compliance by POTW, assessment of compliance by industrial users discharging to the POTW, and assessment of POTW's status regarding the Pretreatment Audit and Inspection Focus Topics. Inspection results shall be entered into ICIS within 10 days of conclusion of field activities / site visit.	PCIs include all required components and follow the procedures outlined in the EPA audit guidance manual (EPA 833/B-86-100, July 1986). ICIS Entries: 95% of Inspection results are entered into ICIS in accordance with the timeliness requirements in the Performance Standard. 98% of the data entered into ICIS is complete and accurate as of the time it is entered.
Task 3.B: Prepare PCI Inspection Reports and submit to EPA and the State.	Inspection reports shall include all inspection results for each required component assessed during the PCIs. Inspection reports shall comply with the format specified in Chapter 9 of the EPA Compliance Inspection manual https://www.epa.gov/sites/production/files/2013-09/documents/npdesinspect_0.pdf	Not less than 95% of the time, PCIs reports shall contain all required elements, are technically accurate and professionally written and proofread, and are delivered on the agreed schedule.

	and shall be submitted on the schedule agreed to, and documented in, the latest approved tracking spreadsheet.	

Task B-4

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 4: **Conduct evaluations of components of new pretreatment programs** and prepare evaluation reports for EPA and State review.	Evaluations shall focus on the assigned component(s) and adequately summarize and document the suitability of those pretreatment program components for regulatory compliance in accordance with the following EPA guidance documents: Guidance Manual for POTW pretreatment program development https://www3.epa.gov/npdes/pubs/owm0003.pdf Pretreatment Program legal authority review checklist https://www3.epa.gov/npdes/pubs/pretreatment_legal_checklist.pdf Local Limits Development guide: https://www3.epa.gov/npdes/pubs/pretreatment_local_limits.pdf Enforcement Response Guidance: https://www3.epa.gov/npdes/pubs/owm0015.pdf	Evaluations are found adequate and useful for EPA and State pretreatment oversight on an individual basis. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the direction of EPA. ▪ 100% of submitted documents conform to the listed guidance documents. ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).

Task B-5

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 5: **Conduct evaluation(s) of new pretreatment programs** and prepare evaluation reports for EPA and State review.	Evaluations shall contain a thorough overview of the assigned pretreatment program(s) and adequately summarize and document the suitability of those pretreatment program components for regulatory compliance in accordance with the following EPA guidance documents: Guidance Manual for POTW pretreatment program development https://www3.epa.gov/npdes/pubs/owm0003.pdf Pretreatment Program legal authority review checklist https://www3.epa.gov/npdes/pubs/pre	Evaluations are found adequate and useful for EPA and State pretreatment oversight on an individual basis. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the direction of EPA. ▪ 100% of submitted documents conform to the listed guidance documents. ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software,

	treatment_legal_checklist.pdf Local Limits Development guide: https://www3.epa.gov/npdes/pubs/pretreatment_local_limits.pdf Enforcement Response Guidance: https://www3.epa.gov/npdes/pubs/owm0015.pdf	and checked for functionality (no corrupted files, etc.).

Task B-6

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 6: **Conduct pretreatment training** for state staff.	-Course materials shall be delivered on the schedule agreed with EPA and the SWRCB. -Content of course materials shall be approved in advance by EPA. -Course evaluations shall be solicited from all attendees and return at least 80% favorable response rate.	Course Materials are delivered on the agreed schedule and address the topics requested by EPA and SWRCB. Evaluations are returned from at least 50% of class participants, and at least 80% of those participants report the class to have improved their understanding of pretreatment implementation.

Task C-1

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
1.A.1 Kick-off Meeting: The contractor shall conduct a kick-off meeting and prepare the agenda and meeting summary.	○ Kick-off meeting shall be coordinated with all parties in a timely manner. ○ Agenda topics shall include all pertinent issues for discussion. ○ Agenda topics shall be fully addressed during the meeting. ○ Open issues shall be addressed within 5 days of meeting. ○ Meeting summary shall be submitted to the WACOR within 5 days of the meeting. ○ Meeting summary shall appropriately cover topics of discussion including key details and agreements.	▪ The kick-off meeting is held within 3 weeks of Task Order award, and no later than September 30 2017. ▪ The draft agenda is submitted to the WACOR at least 3 days prior to the meeting. ▪ 90% of all agenda topics are fully addressed during the meeting. ▪ 95% of the agenda and meeting summary shall be accurate, thorough, clear, concise, and free of spelling and grammar errors.
1.A.2 Coordination and Planning: The contractor shall be available for discussions with the WACOR about permit issuance progress and related topics.	○ The contractor shall maintain regular communications with the WACOR, the SWRCB liaison, and the Regional Water Boards' permitting liaisons. ○ The contractor shall notify the WACOR in a timely manner of any issues, concerns or potential	▪ The contractor shall contact the WACOR, via telephone or email, at least once each month. ▪ The contractor shall notify the WACOR of any significant issues, concerns or potential schedule impacts within 3 days of identification.

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	schedule changes. o The contractor shall be responsive to WACOR inquiries. o Conversations with the WACOR about progress on permit drafting shall be held not less than monthly (e.g. as part of monthly update calls, below), or as requested by the WACOR. o The contractor shall confirm in writing any significant decisions or agreements. E-mail is an acceptable medium for written confirmations.	▪ The contractor shall respond to WACOR inquiries or requests within 3 days. ▪ The contractor shall submit documentation of significant decisions or agreements to the WACOR within 3 days of interaction. ▪ 90% of the documentation shall be thorough, accurate, clear, concise and free of spelling or grammar errors.
1.A.3 Monthly Update Calls: The contractor shall participate in monthly update calls with EPA and the SWRCB.	o Calls shall be held not less than monthly on a schedule agreed to between the WACOR, SWRCB representative, and the contractor. o Calls shall address the status of every active (assigned but not yet completed) permit being worked on under the Task Order, as listed in the Monthly Progress Report. o Contractor shall update the WACOR and SWRCB representative on any open issues, concerns or schedule changes; and shall be responsive to EPA and SWRCB inquiries.	▪ Call schedules are confirmed by the contractor not less than 1 week in advance. ▪ No monthly update calls are missed except by prior agreement with the WACOR, and calls which are rescheduled take place within 2 weeks of the original date. ▪ 90% of calls shall successfully address all ongoing work listed in the respective Monthly Progress Report. ▪ Issues which cannot be resolved on the call itself are responded to within 5 business days 90% of the time.
1.B.1 Tracking of Progress on Permit Issuance ("Tracking Spreadsheet"): The contractor shall maintain an accurate record of assigned work and projected interim and final dates.	o The contractor shall prepare a tracking spreadsheet showing projected dates for the draft, review, correction and submission to Regional Water Boards of each assigned permit o The contractor shall ensure this spreadsheet remains up to date during performance of the TO. o The spreadsheet shall be in .XLS or .XLSX format and based on the template provided	▪ Initial Tracking Spreadsheet shall be crafted within 2 weeks of receiving the first Technical Directive assigning specific permits and shall be no less than 95% accurate. ▪ Updates to the Tracking Spreadsheet shall be made within 3 days of new Technical Directives or schedule changes made by the Regional Water Boards, at which point updated copies shall be sent to the

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
		WACOR and SWRCB. ▪ Spreadsheet meets the format specified.
1.B.2 Monthly Progress Reports: The contractor shall prepare and submit a report on permit-writing progress during each month.	○ Permit Writing status shall be reflected in, and consistent between, the monthly invoices and the monthly progress reports. ○ The monthly progress report document shall concisely and accurately detail current status on each permit, including progress, projected dates, major issues encountered, and upcoming milestones. ○ A report shall be submitted by the 10th day of each calendar month, covering activities during the previous calendar month. ○ The Monthly Progress Report shall distinguish between the Regional Water Boards when reporting work which has been conducted. ○ The progress report shall include an up-to-date version of the Tracking Spreadsheet, with highlighting for any changes made in the previous month to scheduled dates.	▪ There shall be no discrepancies between monthly progress reports and submitted invoices in 95% of cases. ▪ 95% of monthly progress reports shall contain all the required information for permits whose status has changed. ▪ 95% of monthly progress reports are delivered by the 10th-day-of-next-month deadline. ▪ Progress Reports are organized to distinguish between work performed for each regional board ▪ Progress reports highlight major issues with each permit, particularly any issues which affect multiple permits or multiple regional water boards. ▪ 95% of included Tracking Spreadsheets have correct highlighting of all changed dates, with notes on the cause of each change.
1.B.3 Itemized Invoices: Monthly invoices shall identify and distinguish work completed for each Regional Water Board separately.	○ Monthly invoices shall include a list, by Regional Water Board, of all permits worked on in the preceding month and their status as of the date of the invoice.	▪ 100% of invoices are properly itemized in this fashion. 95% of invoices are found to be accurate when compared to which deliverables have been received by the WACOR.
1.B.4 Submission Requirements: The WACOR and SWRCB shall be copied on all significant submissions of documents, including submission of draft and final permits (deliverables) to the Regional Water boards.	○ The WACOR and SWRCB representative shall receive copies of all draft and final permits prepared by the contractor at the same time as these deliverables are sent to the relevant Regional Water Board. ○ Documents shall be in either .DOC, .DOCX, or .PDF file formats (for text) or .XLS or	▪ 95% of submissions are appropriately copied to the WACOR and SWRCB representative upon submission, and all other submissions reach the WACOR and SWRCB representative within 3 days of being identified. ▪ 100% of submitted documents conform to the formats listed

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	.XLSX format (for spreadsheets) o Documents shall be accessible, functional and free from computer viruses or other technology problems.	▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).
QA/QC Plan	If needed develop QA/QC plan for relevant permits. Need will be determined as part of kick-off meeting, or as additional permits are assigned.	If needed QA/QC plan must meet standards of EPA QC Section *(EPA QA/R-5).* QA performance shall be in conformance with the *Office of Water Quality Management Plan of 2001.*

Task C-2

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 2 (all subtasks): Prepare draft NPDES permits - As listed in the table above, complete contractor activities 1, 2, 3, and 7, plus the specified number of additional contractor activities as directed in each subtask above.	o Draft documents (RPAs, issue papers, permit drafts, administrative drafts etc.) shall be submitted in accordance with the schedule above, starting on the date a facility is assigned as part of a Technical Directive from the WACOR. o Permit drafts shall be delivered on or before the designated submission date agreed with the Regional Water Board. o Permit drafts shall be substantially free from factual or regulatory errors, and require only minimal revision by the issuing Water Board o Draft permits must be professionally written and carefully edited and proofread o All permitting drafts must be in full compliance with all applicable laws. o Documents shall be in either .DOC, .DOCX, or .PDF file formats (for text) or .XLS or .XLSX format (for spreadsheets) o Documents shall be accessible, functional and free from computer viruses or other technology problems.	▪ Permit drafts and other permit components shall be delivered on time, relative to the schedule listed in Table 1, 100% of the time unless prior arrangements for alternate schedules are made with the Regional Water Board before the final due date. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the discretion of the Regional Water Board. ▪ 100% of submitted documents conform to the formats listed. ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).

Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry and coding training.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry and permit coding training will follow and/or include guidance provided within SWRCB QAPrP.

PERFORMANCE SURVEILLANCE PLAN			
Performance Requirement	**Measurable Performance Standards**	**Surveillance Methods**	**Incentives/Disincentives**
Management and Communications: During the life of this work assignment, the Contractor shall notify EPA immediately of any issues that may impact the timeliness of deliverables of the problems associated with the development of deliverables.	The Contractor shall maintain contact with the WACOR throughout the performance of the work assignment. The contractor shall identify to the WACOR any delays with regard to deliverables not less than one week prior to the deliverable date that has been established in the work assignment or technical direction document. The contractor shall identify to the WACOR any issues or concerns that have a direct impact on project schedules within three (3) days of occurrence. The contractor shall provide options for EPA's consideration on resolving or mitigating the impacts identified.	The WACOR and CL-COR (as necessary) will allocate the time needed to discuss and address all issues identified by the Contractor. The WACOR and CL-COR will document and maintain a complete record of the issues, agreements and outcome. The WACOR and CL-COR will review monthly progress reports for indicators of problems not previously mentioned. The WACOR will also monitor the timely receipt of deliverables. For those that are late without prior notice, the EPA will formally document to the Contracting Officer the late delivery.	If the contractor fails to implement corrective actions after EPA identifies and provided written documentation of performance issues, EPA will rate this performance category "unsatisfactory." If three or more the active work assignments for the period are rated unsatisfactory, EPA will rate the Business Relations category as unsatisfactory in the CPARS Contract Performance System.

Cost Management and Control: The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where practical.	The Contractor shall monitor, track and accurately report level of effort, labor cost, other direct cost and fee expenditures to EPA through monthly progress reports and approved special reporting requirements. The Contractor shall assign appropriately leveled and skilled personnel to all tasks. The contractor should not exceed established work assignment ceilings and, in general, should expend dollars and hours at similar ratios. If either the expenditure of hours or dollars deviates significantly, the contractor shall provide an explanation in its Monthly Progress Report.	The CL-COR will routinely meet with the Contractor's Project Manager to discuss the work progress and contract and individual work assignment level expenditures. The CL-COR and WACOR shall review the Contractor's monthly progress reports and request the Work Assignment Contracting Officer's Representative to ensure that ceilings are not exceeded, that progress is being made, and that the contractor is effectively utilizing the LOE provided under the work assignment.	EPA will thoroughly review work assignment funding ceiling overruns to determine the contractor's ability to control the situation. If EPA determines that the contractor failed to control cost, the contractor will be rated "unsatisfactory" in this category. Multiple incidents of work assignment overrun that result in an overall cost overrun of greater than 4% of the approved total work assignment funding for the current contract period, will result in an unsatisfactory rating in the CPARS Contract Performance System.
Quality of Product/Services: The contractor shall ensure documents developed under this task order are quality products that are factual and based on sound science and engineering principles.	Products delivered under this work assignment must not contain any major factual errors. The analyses provided in each product shall be logical, consistent, and defensible.	The WACOR will review all documents delivered under this work assignment for content accuracy.	If EPA determines that the contractor's analyses is factually inaccurate or if significant technical errors are found in any documents produced by the contractor, EPA may determine that the cost associated with redoing the work shall be borne by the contractor. Multiple incidents of this nature under the contract will result in an unsatisfactory rating for Quality and Manage Control being reported to the CPARS Contract Performance System.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 1-67

☐ Other ☒ Amendment Number: 000001

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2021 Base Option Period Number 1	ICIS NPDES

Contractor: EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW: See PWS

Purpose:
- ☐ Work Assignment
- ☒ Work Assignment Amendment
- ☐ Work Plan Approval
- ☐ Work Assignment Close-Out
- ☐ Incremental Funding

Period of Performance: From 09/12/2017 To 06/30/2018

Comments:

☐ Superfund — Accounting and Appropriations Data — ☒ Non-Superfund

SFO (*Max 2*) ☐

Note: To report additional accounting and appropriations date use EPA Form 1900-69A.

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period: 07/01/2016 To 06/30/2021 Cost/Fee: LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee LOE:

Cumulative Approved: Cost/Fee LOE:

Work Assignment Manager Name Peter Kozelka (Signature) (Date)	Branch/Mail Code: Phone Number: 415-972-3448 FAX Number:	
Project Officer Name Tangela Cooper (Signature) (Date)	Branch/Mail Code: Phone Number: 202-566-0369 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 9/12/2017 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 1-67
AMENDMENT 1

TITLE: Technical Support for California NPDES program

Task A: Data Entry into the Integrated Compliance Information System-NPDES (ICIS-NPDES) Support

Task B: Pretreatment Inspection Support

Task C: Permit Writing Support

Task D: Amendment 1 – more permit writing support

WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):

Peter Kozelka
EPA Region 9
75 Hawthorne St. Mail Code: WTR 2-3
San Francisco, CA 94105
(415) 972-3448
kozelka.peter@epa.gov

ALTERNATE WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (AWACOR):

Pascal Mues
EPA Region 9
75 Hawthorne St. code: WTR 2-3
San Francisco, CA 94105
(415) 972-3768
mues.pascal@epa.gov

PERIOD OF PERFORMANCE: September 12, 2017 through June 30, 2018

I. BACKGROUND

The Clean Water Act (CWA) authorized efforts to restore and maintain the Nation's waters, including Section 402 of the Act specifically created of the National Pollutant Discharge Elimination System (NPDES) permit program to regulate and reduce the point source pollution. Point sources must obtain a discharge permit from the proper authority, including states, tribes, and territories. EPA Regions are responsible for implementing the NPDES permit program in non-delegated States and for federal and tribal dischargers in authorized States. The State of California is authorized to operate the NPDES program through the State Water Resources Control Board and nine Regional Water Boards.

EPA maintains the Integrated Compliance Information System-NPDES (ICIS-NPDES) as the national database of record for the NPDES program, and all states with NPDES delegation are required to enter their NPDES permit-related data into ICIS-NPDES. EPA Region 9 has historically utilized contractor support to support California's NPDES data requirements in ICIS-NPDES. EPA Region 9 has also previously provided technical support to facilitate permit development and issuance in California, including pretreatment inspections, program reviews, permit writing, training and specialized technical assistance to ensure protection of receiving water quality. Contractor support to be performed represents part of EPA's technical support to the State of California's NPDES program.

II. PURPOSE AND OBJECTIVE

The contractor shall, in consultation with EPA, provide technical support of California's NPDES permit program for three tasks: data entry in ICIS-NPDES, pretreatment inspections and permit writing.

Data entry and training will support EPA Region 9 and California data entry and reporting using the NPDES Permit Status Tracking List (NPST), which the State and EPA Region 9 use to assist in tracking NPDES permitting activities.

Pretreatment inspections and related activities will support one aspect of California's NPDES program to control nondomestic wastewater that is discharged to municipal sanitary sewer systems; also known as publicly owned treatment works (POTWs). The contractor shall provide technical assistance in pretreatment.

Permit writing support will include preparing draft individual permits, selected permit components, and/or generating standardized NPDES permit language to meet the needs of the State of California and ensure compliance with the Clean Water Act and other applicable federal laws. EPA may also ask contractor to provide specialized technical assistance on various NPDES topics, such as impacts evaluation of cooling water intake structures, dilution allowances, or thermal impact evaluations. The work to be performed may include providing technical and policy evaluations for specific NPDES permits or for issues that are relevant to many NPDES permits.

ASSUMPTIONS AND CONSTRAINTS

For all three tasks, the contractor shall possess and exercise a comprehensive understanding of the Clean Water Act, the Porter-Cologne Act, and all other relevant federal and state water protection laws; the skills and tools necessary to conduct pretreatment audits, inspections, and programmatic reviews, and a thorough appreciation of California's regulatory programs and practices in Clean Water Act – NPDES permitting.

The contractor is authorized to contact the SWRCB and Regional Water Boards directly to obtain additional information but shall copy EPA on all information requests and document all requests and responses for EPA. The contractor shall inform the EPA Work Assignment Contracting Officer's Representative (WACOR) of any such information requirements. The contractor shall only follow technical direction received from the WACOR.

Permitting writing assignments may shift over the course of performing work as the needs of individual Regional Water Boards change, but the work performed will be for a predetermined number of permits in each of three (3) levels of complexity and support required. The number of permits for each level of complexity, and what tasks are anticipated under each level, are listed below under Task C. Specific permits on which assistance is to be provided will be identified to the contractor in a technical directive by the EPA Work Assignment Contracting Officer's Representative (WACOR), along with applicable NPDES permit number.

If travel to and from California locations is required for these tasks, it should be limited to a reasonable number of trips, not to exceed fifteen (15), unless staff conducting the trip(s) are locally based.

The contractor shall demonstrate an understanding of, and follow, all applicable laws, regulations and policies.

The contractor shall ensure compliance with Agency standards.

The work described under this PWS may be extended by additional one-year option periods, provided that: (1) the Government has a need for continued performance, (2) the contractor has achieved acceptable quality levels, and (3) the contractor receives notice of the availability of funding. Note: Exercise of the additional one-year option periods are contingent upon meeting contract level award term requirements. The Government can unilaterally exercise an option if notification to exercise the option is provided to the contractor within 30-60 days prior to the end of the current period performance. If the Government provides notification to exercise the option in less than 30 days prior to the end of the current period of performance, exercise of the option is negotiated bilaterally.

III. SCOPE OF WORK

This PWS describes services required to support EPA Region 9 to carry out all tasks delineated below within the context of the NPDES permitting requirements of the Clean Water Act. The contractor shall perform all activities in a manner consistent with all federal data requirements safeguarding the relationship between the federal government and the State of California.

TASK A-1: Data Entry for NPDES Permits into ICIS-NPDES

The contractor shall support EPA Region 9 in entering NPDES permit data into ICIS-NPDES. The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCB) will send copies of recently issued NPDES permit actions, including permit adoptions, reissuances, and modifications, enforcement actions, Time Schedule Orders, Compliance Schedule Orders, recessions, and amendments directly to the contractor. The contractor shall enter all permitting data pertaining to Appendix A of the electronic rule that is available within the permit documentation, including, but not limited to, permit facility, permit tracking, and permit limits. The contractor shall assume 120 (approximately 60 major and 60 minor) NPDES permits will be issued and provided for input to ICIS-NPDES. The contractor will not be responsible for General Permits; however, will enter all basic permitting information.

EPA will supply the State Water Resource Control Board (SWRCB) and contractor with the Quarterly Non-Compliance Report (QNCR). The contractor shall review and provide QNCR data support to California during the timeperiod of the unofficial Reportable Non-Compliance (RNC) Run, generally November, February, May, and August of each fiscal year. The contractor shall support the SWRCB with ICIS-NPDES database updates as needed for permits in a Non-Compliance status. The contractor shall make any required data updates to the ICIS-NPDES database as requested by the SWRCB.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task A-1 data entry.

TASK A-2: Support for Tracking NPDES Permit Issuance in the NPDES Permit Status Tracking List

The Web-based NPDES Permit Status Tracking List (NPST) was designed to assist in effectively managing the NPDES permit issuance process in California. NPST utilizes NPDES permit application, public notice, public comment period, permit issuance, permit effective, and permit expiration dates for all permittees. From this information NPST will report schedules for permit reissuance, track permit reissuance progress (including interim milestones), and support estimates for permit issuance workloads and resources for future fiscal years. The system will provide automated summary tables and charts to assist in providing updates to NPDES permit issuances.

Under this task, the contractor shall provide support in maintaining NPST to assist work planning between the SWRCB and the nine RWQCBs. Specifically, the contractor shall be required to extract relevant data and information from ICIS-NPDES subsequent to permit adoption (issuance). The types of information that must be extracted include:

- NPDES Permit Number, Permit Name, Facility Name; and
- NPDES application, public notice, public comment period, permit issuance, effective, and expiration dates.

The contactor shall also retrieve from the SWRCB and the nine RWQBs additional permit information not contained in the ICIS-NPDES system and enter it into the NPST. The additional information includes:

- Order Numbers as assigned to individual permits by the SWRCB and nine RWQBs; and
- The detailed list of proposed permit reissuances/adoptions for the fiscal year.

The contractor shall follow the approach and procedures for providing support for tracking NPDES permit issuance that are currently used to support the NPDES program effort in California. The specific procedures and protocols were developed to ensure high quality data is maintained within NPST. The specific approach is summarized briefly below:

- The contractor will receive copies of adopted Orders (NPDES individual, general and MS4 permits) from SWRCB and each of the nine RWQCBs. After receipt, the contractor shall ensure all copies are dated and logged into a document control system. Electronic copies with electronic signature posted online by SWRCB and RWQCBs are acceptable as are hard copies with original signatures.

- After receipt from SWRCB or a RWQCB, the contractor shall enter the relevant (NPDES individual, general and MS4) permit information in the ICIS-NPDES database. Monthly, the contactor shall extract the relevant permit information from the ICIS-NPDES database and update the NPST data.

- The contractor shall collect from the SWRCB and/or RWQCB permit scheduling event dates including; planned issuance date, and public comments due date for entry to NPST.

- This NPDES Permit Tracking System (NPTS) shall contain at a minimum: permit/document received date, permit/document coding date, and an email notification to EPA and SWRCB of coding completion. NPTS will be made available to EPA Region 9, SWRCB and RWQCBs at all times during the performance of assigned tasks.

The contractor shall assume 120 NPDES permits (60 major and 60 minor) will be provided for data extraction.

TASK A-3: Permit Coding Training

The contractor shall work closely with EPA and SWRCB to develop training workshop and training materials for State staff regarding permit coding/data entry to ICIS-NPDES. Contractor shall work with EPA, SWRCB and RWQCB staff to schedule the training to maximize staff participation. Contractor shall provide training to participants, assume 3-4 days for training course held in California between January and July 2018.

The contractor will develop and propose training agenda and guidance materials on permit coding. Primary topic is NPDES permit coding which entails reviewing and understanding final permits and then coding/entering information into ICIS database to fulfill NPDES program requirements. Training agenda and materials shall be thorough and comprehensive to ensure

State staff will be able to code NPDES permits themselves. Preferably, training course will include hands-on exercise in reviewing a permit and performing permit coding into ICIS database. Schedule shall include sufficient time for EPA and SWRCB to review and provide comments to the contractor on the proposed agenda and contents prior to contractor delivering the training course.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task A-3 permit coding training.

VIIa. DELIVERABLES REQUIRED AND SCHEDULE – DATA ENTRY

Deliverables: The contractor shall reflect a thorough understanding of national and State statutes, regulations, court rulings, policy and guidance. Final deliverables shall be consistent with the acceptance criteria described above, and will reflect any comments from EPA. Additionally, all final deliverables shall be of superior editorial quality. The contractor shall provide quality assurance reporting as specifically identified by the EPA Work Assignment Contracting Officer's Representative (WACOR).

Deliverable Description	Delivery Date
Task A-1	
NPDES permit number and application/NOI received, permit issuance, effective, and expiration dates entered into ICIS-NPDES	Within 7 days following receipt of permit document from SWRCB, RWQCB, or WACOR.
Permitted features, permit limits, and monitoring requirements, extracted and entered into ICIS-NPDES.	Within 30 days following receipt of permit, amendment or modification from SWRCB, RWQCB, or WACOR.
Enforcement actions and associated limits extracted and entered into ICIS-NPDES.	Within 30 days following receipt of enforcement document from SWRCB, RWQCB, or WACOR.
Pending Permits report generated and provided to WACOR.	One week prior to beginning of month.
Reissuance of pending permits finalized in ICIS-NPDES.	On effective date of permit or first business day following effective date.
Task A-2	
Permit Status Tracking Report of NPDES individual, MS4, and general permits with issuance scheduling status, updated with ICIS-NPDES event and state scheduling event dates.	Updated within first 7 days of each month.
NPDES permit number, application, public notice, permit issuance, effective, and expiration dates entered into ICIS-NPDES and synchronized with data in NPST.	Within 7 days following receipt of application/NOI and public notice date information, or permit document from SWRCB, RWQCB, or WACOR.

Deliverable Description	Delivery Date
Permit scheduling event dates for: planned issuance date and public comments due date for entry to NPST.	Updated within first 7 days of month for the Permit Status Tracking Report with information from SWRCB and/or RWQCB.
Task A-3	
Schedule for training task	Within 2 months of the SWRCB request, the contractor shall provide final schedule for training task.
Training course agenda and materials (draft and final)	Training agenda and materials should be submitted to EPA and SWRCB with sufficient time for review and revisions prior to training course.
Training course (approx. 3-4 days; presented in California)	Training course should be accomplished within the second to third quarter of the Federal fiscal year. (January-June 2018)

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task A and all sub-tasks therein is approximately 1872 hrs. The contractor may assume one (1) travel trips for all sub-tasks associated within Task A.

SCOPE OF WORK – Task B: Pretreatment Support

Task B-1: Pretreatment Project Management

1.A. Project Administration: The contractor's responsibilities shall include regular coordination with the WACOR, the State Water Resources Control Board (SWRCB), and relevant Regional Water Boards to ensure preparation of pretreatment inspections and reviews which are compliant with state and federal law, on a schedule which meets the needs of these Water Boards.

1.A.1. Kick-off Meeting: An initial kick-off meeting for the contractor to meet with the WACOR and SWRCB oversight team. The objective of the kickoff is to provide a review of scope of pretreatment inspection tasks for the year which may be assigned to the contractor. This meeting may take place in person or via video- or teleconference. The agenda and meeting notes shall be prepared by the contractor, and the agenda shall identify any information the contractor will need to receive from EPA or the SWRCB to begin work. The draft agenda shall be submitted to the WACOR at least three days prior to the meeting.

1.A.2. Coordination and Planning: The contractor shall be available for routine communication, planning and coordination with the WACOR and EPA Technical Expert, on California statewide and discharger-specific pretreatment issues. The contractor shall confirm in writing any significant decisions or agreements made during these interactions. These interactions will take place at least once a month

(possibly as part of the Monthly Update Calls, see next), or as needed during normal business hours, via telephone, email, skype, video conferencing or in person.

1.A.3. Monthly Update Calls: The contractor shall participate in update calls, to be held on a frequency not less than monthly, with the WACOR and the EPA Technical Expert to detail progress on each active work project (pretreatment inspection, report, or training), to identify and correct problems, and provide feedback on pretreatment issues in individual areas. These calls shall be structured as an item-by-item review of the Progress Report and associated Tracking Spreadsheet.

1.A.4. Maintenance of Inspector Credentials: As conducting on-site pretreatment inspections requires appropriate credentialing as EPA-affiliated inspectors, all contractor personnel assigned to perform such inspections shall maintain valid inspector credentials for the duration of the period of performance.

1.B. Tracking and Reporting: The contractor shall ensure EPA and the SWRCB remain fully informed about the contractor's activities, and approve of those activities, through the following measures:

1.B.1. Tracking of progress on pretreatment inspections and report issuance: The contractor is required to track each pretreatment inspection report during the development process. The contractor shall maintain an up-to-date record of progress on all work assigned, including projected draft, review, correction and submission dates, in an electronic tabular format (hereafter referred to as the "Tracking Spreadsheet") based on the provided example. This information, particularly changes in target dates, will be shared with the WACOR during the monthly update calls and as part of the monthly progress reports, both described below. The contractor is required to submit the report electronically in a table format that includes each of the specific projected dates above, as well as timelines for completion of all final pretreatment report packages.

1.B.2. Monthly Progress Reports: The contractor shall prepare and submit a report on pretreatment-inspection progress during a given month, by the 10th day of the following month. This Progress Report shall be sent to the WACOR and the designated contact at the SWRCB, and shall take the form of an E-mail or similar communication enabling sharing of digital files. The Report shall contain a separate section on work in each Regional Water Board, and shall discuss in writing any changes in target dates, the grounds for those changes, and major issues encountered, with special emphasis on any issues affecting more than one Regional Board. Attached to the E-mail and integral to the Progress Report shall be a copy of the most recent version of the Tracking Spreadsheet. Projected dates which have changed since the previous Monthly Progress Report shall be highlighted in the spreadsheet.

1.B.3. Itemized Invoicing: Each monthly invoice to EPA shall include a list, itemized by Regional Water Board, of all pretreatment inspections and reports worked on for each regional board in the preceding month and the status of each inspection and/or report as of the date of the invoice.

1.B.4. Submission Requirements: Tracking Spreadsheets, Monthly Progress Reports, and other significant communications or submissions of deliverables shall be sent by E-mail to the WACOR with CCs to the EPA Technical Expert. Documents shall be in

either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

Task B-2: Pretreatment Program Audits

The contractor shall support EPA Region 9 in conducting on-site pretreatment program audits (PCAs) and submitting written audit reports on the findings, as listed below.

Pretreatment Program Audits to be conducted: 9

In preparation for each audit, EPA Region 9 or the State will furnish the contractor with all applicable background documents (e.g., permit and fact sheet, latest annual report, and prior audit or inspection reports) for each POTW pretreatment program. The contractor shall assume that generally two days on-site will be required for each audit. The contractor shall schedule field work in a manner that efficiently uses travel resources. The contractor shall enter these activities into ICIS within 10 days of field activities.

1.A. Conduct Pretreatment Compliance Audits (PCAs): The contractor shall conduct PCAs at the facilities specified by the WACOR, in accordance with the EPA audit guidance manual entitled Pretreatment Compliance Inspection and Audit Manual for Approval Authorities (EPA 833/B-86-100, July 1986). Audits shall be scheduled based on input from the State and the WACOR.

1.B. Prepare PCA Reports: The contractor shall prepare written reports for each PCA conducted. The report format is specified in the Audit Manual listed above. Each audit shall include: 1. an assessment of the extent to which each POTW under the local pretreatment program is complying with federal pretreatment regulations, their approved pretreatment programs, and requirements specified in their permit(s); 2. an assessment of industrial users regulated by the POTW to determine compliance with pretreatment requirements; and 3. an assessment of the POTW's status regarding the items in Appendix A titled "Pretreatment Audit and Inspection Focus Topics."

Task B-3: Pretreatment Program Inspections

The contractor shall support EPA Region 9 in conducting on-site Pretreatment Compliance Inspections (PCIs) and submitting written reports on the findings, as listed below.

Pretreatment Program Inspections to be conducted: 23

In preparation for each inspection, EPA Region 9 or the State will furnish the Contractor with all applicable background documents (e.g., permit and fact sheet, latest annual report, and prior audit or inspection reports) for each POTW pretreatment program. The contractor shall assume that generally one day on-site will be required for each inspection. The contractor shall schedule field work in a manner that efficiently uses travel resources. The contractor shall enter these

activities into ICIS within 10 days of field activities.

1.A. Conduct Pretreatment Compliance Inspections (PCIs): The contractor shall conduct PCIs at the facilities specified by the WACOR, in accordance with the EPA audit guidance manual entitled Pretreatment Compliance Inspection and Audit Manual for Approval Authorities (EPA 833/B-86-100, July 1986). Audits shall be scheduled based on input from the State and the WACOR.

1.B. Prepare PCI Reports: The contractor shall prepare written reports for each PCA conducted. The report format is specified in the Audit Manual listed above. Each audit shall include: 1. an assessment of the extent to which each POTW is complying with federal pretreatment regulations, their approved pretreatment programs, and requirements specified in their permit(s); 2. an assessment of industrial users regulated by the POTW to determine compliance with pretreatment requirements; and 3. an assessment of the POTW's status regarding the items in Appendix A titled "Pretreatment Audit and Inspection Focus Topics."

Task B-4: Pretreatment Evaluations of Individual Program Components

The contractor shall support EPA Region 9 by evaluating new or revised components of local pretreatment programs as listed below. Such components are:

- Ordinances;
- Local limits development studies;
- Enforcement response plans; or
- Multijurisdictional agreements

The need for these evaluations is created by many circumstances including new local program development, reissuance of a municipality's NPDES permit, or a pretreatment program's adoption of the National pretreatment streamlining regulation changes. In performing these evaluations, the contractor shall generally follow U.S. EPA's model ordinance, local limits guidance document, streamlining implementation guidance, and other applicable EPA guidance. EPA Region 9 or the State will furnish the contractor with all applicable background documents. The ordinance reviews envisioned under this task are substantial efforts frequently associated with new program development or streamlining adoption. The evaluation of ordinance changes that are limited to changes to reflect new local limits is included as part of the evaluation of local limits development studies. EPA Region 9 expects that travel will not be necessary to perform work under this task.

Task B-5: Pretreatment Evaluations of Full Program Submittals

The contractor shall support EPA Region 9 by evaluating new or revised full pretreatment program submittals as listed below. Such evaluations will include all aspects of a pretreatment program. The need for these evaluations is created by many circumstances including new local program development, reissuance of a municipality's NPDES permit, or extensive pretreatment program modifications. In performing these evaluations, the contractor shall generally follow

U.S. EPA's model ordinance, local limits guidance document, streamlining implementation guidance, and other applicable EPA guidance. EPA Region 9 or the State will furnish the contractor with all applicable background documents. EPA Region 9 expects that travel will not be necessary to perform work under this task.

Task B-6: Pretreatment Training Sessions

The contractor shall support EPA Region 9 by providing pretreatment training to State personnel and/or local pretreatment operators. There shall be two (2) one-day trainings at a time and location determined by the State or Regional Water Board and communicated via technical direction from the WACOR. Specific pretreatment training details will be provided to the contractor in consultation with the State and Regional Water Boards via technical direction from the WACOR.

The contractor shall provide an electronic version of Course Materials, consisting of PDFs of each module of the pretreatment training class. The contractor shall provide assistance to EPA and California to develop associated materials, worksheets and sample problems.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task B as appropriate.

VIIb. DELIVERABLES REQUIRED AND SCHEDULE – PRETREATMENT

Based on Regional Water Board requirements and applicable formats and/or language, the contractor shall conduct the pretreatment audits/inspections/program reviews and prepare inspection reports, including all materials and documents used in permit development) for each facility assigned. These draft documents shall be provided to appropriate EPA staff (the WACOR and the regional pretreatment coordinator) and State staff for review and comment, as arranged through the WACOR. Individual deliverable due dates shall be agreed with the relevant Regional Water Board, with concurrence by SWRCB and EPA.

Documents shall be submitted by E-mail to the relevant Regional Water Board pretreatment contact with a CC to the WACOR, in either .DOC or .PDF file formats and shall be accessible, functional and free from computer viruses or other technology problems.

The duplication of more than 5,000 copies of a single page or 25,000 or more total impressions is considered "printing" and, therefore, prohibited. For more information on restrictions relating to deliverables, the contractor is referred to the EPA Publication Management Guide (EPA-175-K-92-011).

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

SUMMARY OF DELIVERABLES AND DUE DATES			
Task/Subtask	Deliverable	Distribution	Due Dates*
Task 1.A.1	Kickoff Meeting Agenda	WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Within 2 weeks of award
Task 1.A.1	Kickoff Meeting Summary	WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Within 3 weeks of award, and no later than September 30 2017.
Task 1.B.1	Tracking Spreadsheet	WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Initial version within 2 weeks of first Technical Directive identifying permits for contractor support, then updated as new dates and information are received
Task 1.B.2	Monthly Progress Report	WACOR, EPA pretreatment coordinator SWRCB pretreatment liaison	By 10th day of each calendar month, for activities during the preceding calendar month.
Task 1.A.3	Monthly Update Call Follow-up	WACOR, SWRCB pretreatment liaison	Monthly after submission of Monthly Progress Reports, on a schedule to be agreed with the SWRCB.
Task 2	Pretreatment Compliance Audit (PCA) report	EPA pretreatment coordinator, EPA WACOR, assigned Regional Water Board pretreatment liaison, SWRCB pretreatment liaison	All field activities and ICIS entries by July 31, 2018, all draft reports by August 31, 2018, all final reports within 15 days of receipt of comments and no later than Sept 30 2018. Specific schedules to be set by Technical Directive as individual
Task 3	Pretreatment Compliance Inspection (PCI) report		
Task 4	Pretreatment program component review		
Task 5	Full Pretreatment program review		

			dischargers are identified for audits.
Task 6	Pretreatment Training	EPA pretreatment coordinator, SWRCB pretreatment liaison	As scheduled with SWRCB, no later than July 30 2018.

*Note: All days are calendar days unless otherwise specified.

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task B and all sub-tasks therein is approximately 2695 hrs. The contractor can assume twelve (12) travel trips for all sub-tasks associated within Task B.

SCOPE OF WORK – Task C: Permit Writing

Task C-1: Permit Writing - Project Management

C-1-1 Project Administration: The contractor's responsibilities shall include regular coordination with the WACOR, the State Water Resources Control Board (SWRCB), and relevant Regional Water Boards to ensure preparation of permit drafts which are compliant with state and federal law, on a schedule which meets the needs of these Water Boards.

a. **Kick-off Meeting:** An initial kick-off meeting for the contractor to meet with the WACOR and SWRCB oversight team. The objective of the kickoff is to provide a review of scope of permit writing tasks for the year which may be assigned to the contractor. This meeting may take place in person or via video- or teleconference. The agenda and meeting notes shall be prepared by the contractor, and the agenda shall identify any information the contractor will need to receive from EPA or the SWRCB to begin work. The draft agenda shall be submitted to the WACOR at least three days prior to the meeting.
b. **Coordination and Planning:** The contractor shall be available for routine communication, planning and coordination with the WACOR on California NPDES permit writing needs. The contractor shall confirm in writing any significant decisions or agreements made during these interactions. These interactions will take place at least once a month (possibly as part of the Monthly Update Calls, see next), or as needed during normal business hours, via telephone, email, skype, video conferencing or in person.
c. **Monthly Update Calls:** The contractor shall participate in update calls, to be held on a frequency not less than monthly, with the WACOR and the SWRCB to detail progress on each active work project (permit), to identify and correct problems, and provide feedback on permitting issues in individual areas. These calls shall be structured as an item-by-item review of the Progress Report and associated Tracking Spreadsheet.

C-1-2 Tracking and Reporting: The contractor shall ensure EPA and the SWRCB remain fully informed about the contractor's activities, and approve of those activities, through the following measures:

d. **Tracking of progress on permit issuance:** The contractor is required to track each permit during the NPDES permit development process. The contractor shall maintain an up-to-date record of progress on all work assigned, including projected draft, review, correction and submission dates, in an electronic tabular format (hereafter referred to as the "Tracking Spreadsheet") based on the provided example. This information, particularly changes in target dates, will be shared with the WACOR during the monthly update calls and as part of the monthly progress reports, both described below. The contractor is required to submit the report electronically in a table format that includes each of the specific projected dates above, as well as timelines for completion of all final permit packages.

f. **Monthly Progress Reports:** The contractor shall prepare and submit a report on permit-writing progress during a given month, by the 10th day of the following month. This Progress Report shall be sent to the WACOR and the designated contact at the SWRCB, and shall take the form of an E-mail or similar communication enabling sharing of digital files. The Report shall contain a separate section on work in each Regional Water Board, and shall discuss in writing any changes in target dates, the grounds for those changes, and major issues encountered, with special emphasis on any issues affecting more than one Regional Board. Attached to the E-mail and integral to the Progress Report shall be a copy of the most recent version of the Tracking Spreadsheet. Projected dates which have changed since the previous Monthly Progress Report shall be highlighted in the spreadsheet.

g. **Itemized Invoicing:** Each monthly invoice to EPA shall include a list, itemized by Regional Water Board, of all permits worked on for each regional board in the preceding month and the status of that permit as of the date of the invoice.

h. **Submission Requirements:** Tracking Spreadsheets, Monthly Progress Reports, and other significant communications or submissions of deliverables shall be sent by E-mail to the WACOR with CCs to the SWRCB contact and relevant Regional Water Board permit contact. Documents shall be in either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

Task C-2: Permit Writing - Draft and Final Permit Packages and Administrative Records

The contractor shall prepare draft permit packages for each facility assigned. Specific permits will be identified by the EPA Work Assignment Contracting Officer's Representative (WACOR) on a regular basis, at minimum quarterly, and provided to the contractor in writing. Correspondence shall primarily be in electronic form. Each permit package shall be consistent

with applicable Federal and California regulations and guidance and also conform to California's style and formatting practices as directed in the permit templates supplied by the State Water Board, and local variations thereon supplied by the Regional Water Board(s).

The contractor may be asked to provide the following services:

- Review data that has been provided by EPA Region 9, the state, tribes, and/or the discharger as part of the permit application process;
- Identify, collect, and review any additional background data for each facility to be permitted and the affected receiving water needed to properly evaluate the need for permit limitations and conditions;
- Prepare a draft permit and supporting documentation for each facility assigned. These draft documents shall be provided to EPA Region 9, and other appropriate parties, for review and comment. Afterwards the contractor shall incorporate and address those comments and submit a permit package for the Regional Water Board to adopt and conduct public notice on. The final drafted products shall also be provided to EPA and the SWRCB at the same time they are sent to the relevant Regional Water Board.
- For certain permits in the higher-tier support groups, as identified by the Regional Water Boards, the contractor may be required to support development of materials for the formal board meeting at which the permit is presented, and/or responses to public comments on the contractor-drafted permit after it is put out for public notice.

Permit packages shall be categorized into one of the following groups, based on the contractor activities requested by the Regional Water Board as listed in Table 1 below:

***Task C-2-a**: Permit Writing* <u>*Group I*</u> (<u>34</u> permits requested at this level of support)

- Contractor activities 1, 2, 3, and 7, plus any <u>one</u> of the following contractor activities: 4, 5, 6, 8, or 9.

***Task C-2-b**: Permit Writing* <u>*Group II*</u> (<u>9</u> permits requested at this level of support)

- Contractor activities 1, 2, 3, and 7, plus any <u>two</u> of the following contractor activities: 4, 5, 6, 8, and/or 9.
- General permit renewals with fewer than 20 enrollees will be assigned this level of support.

***Task C-2-c**: Permit Writing* <u>*Group III*</u> (<u>3</u>) permits requested at this level of support)

- Contractor activities 1, 2, 3, and 7, plus any <u>three or more</u> of the following contractor activities: 4, 5, 6, 8, and/or 9.
- General permit renewals with 20 or more enrollees and new general permits will be assigned this level of support.

If a permit package cannot be precisely categorized into a group based on the above criteria, it shall be classified by the WACOR based on best professional judgment. The total number of permits assigned will not exceed **35** Group I permits, **10** Group II permits, and **3** Group III permits.

The following is the suggested process and timeframe for providing NPDES permit support to Regional Water Boards in California. The process may need to be adjusted based on the specific

schedules and procedures established by the WACOR and the particular Regional Water Board. For each Regional Water Board, the contractor shall identify a single point of contact.

The documents shall be in either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task C-2 permit writing and development.

Table C. Contractor Activity Descriptions and Suggested Delivery Timeframes

No.	Activity Description	Suggested Timeframe
1	Review/Copy Files • The contractor shall assign staff to review and obtain copies of all permit file information necessary for permit development (e.g., applications, monitoring data, compliance and enforcement correspondence). Use of electronic documents where possible, to conserve resources, is encouraged. • The contractor shall coordinate with the WACOR and the Regional Water Board regarding when contractor staff are scheduled for on-site visits for data collection prior to contractor staff arriving at the Regional Water Board.	Within 2 weeks after permit assignment by WACOR
2	Collect Additional Data and Information (as necessary) • The contractor shall be authorized to contact the facility directly if additional data or information is required to initiate permit development. Any correspondence between the facility and the contractor shall be documented for the contract file and Regional Water Board administrative file as deemed necessary (e.g., new data submittal). Perform Pre-Permit Site Visit (as necessary) • As time allows, a permit site-visit <u>may</u> be performed to observe facility operations, outfall conditions, etc. • When feasible, a permit site visit shall be coordinated with planned compliance evaluation inspections (CEIs). • EPA and Regional Water Board facility contacts shall be notified of all permit site visits prior to the visit. At EPA and Regional Water Board discretion, their staff may accompany contractor staff.	Within 4 weeks after permit assignment
3	Complete Draft Reasonable Potential Analysis (RPA) and develop draft Water Quality-Based Effluent Limits (WQBELs)	

No.	Activity Description	Suggested Timeframe
	• Based on review of Report of Waste Discharge (ROWD) or applications, identify permitting policy issues (if any) for discussion with Regional Water Board. As necessary, discuss with Regional Water Board to reach resolution. • Based on data and information collected, a draft RPA and draft WQBELs (if necessary) shall be calculated, summarized, and provided to the Regional Water Board contact for review and comment. • As necessary, the contractor shall participate in meetings and phone calls with the Regional Water Board to discuss any site-specific situations where guidance is needed regarding the approach to be taken for preparing draft permits. • When transmitting the draft RPA and WQBELs to the Regional Water Board, any unique or potentially controversial issues shall be highlighted to facilitate review. • Subsequent to delivery of the draft RPA and WQBELs, the contractor shall schedule a conference call or meeting with EPA and the Regional Water Board to describe the approach taken, data issues (if any), and discuss any unique discharge situations. • The draft RPA and WQBEL documents shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to WACOR and liaison, and the appropriate Regional Water Board Manager and/or Senior.	
	Receive Regional Water Board Comments on Draft RPA and WQBELs	Within 1 week after receipt
4	Prepare Issue Paper • The Issue Paper shall highlight any unique issues or permit conditions in order to facilitate review by the RB. • The Issue Paper may be accompanied by a draft Fact Sheet and/or draft Monitoring and Reporting Program. • The format and guidance to be followed shall be the most recent version of the RB permit template and matrix.	
	Receive Regional Water Board Comments on Issue Paper	Within 2 weeks after receipt
5	Prepare and Deliver Administrative Draft Order/NPDES Permit Package • Based on comments from EPA and the Regional Water Board, revisions to the draft RPA and WQBELs shall be made as necessary. • Administrative Draft Order/NPDES Permit Package includes Cover Page, Limitations and Discharge Requirements, Attachments A through G of the permit template, and a draft cover letter to transmit the administrative draft to the facility.	Within 2 weeks following receipt of comments from EPA and the Regional Water Board on draft RPA and WQBELs

No.	Activity Description	Suggested Timeframe
	• As necessary, and prior to delivery of the draft, the contractor shall contact the Regional Water Board to discuss any site-specific situations where direction is needed regarding the approach to be taken in the Order/permit. • As necessary, a draft Time Schedule Order or Cease and Desist Order shall be prepared for those pollutants for which compliance schedules are not allowed in the Order (those based on Basin Plan water quality objectives). • In order to facilitate review by EPA and the Regional Water Board, any unique issues or permit conditions shall be highlighted in the Administrative Draft Order/NPDES Permit Package. • The Administrative Draft Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Senior (as applicable). • Subsequent to delivery of the Administrative Draft Order/NPDES Permit Package, the contractor shall schedule a conference call (as needed) or meeting with EPA and the Regional Water Board contact to walk through the approach taken for developing requirements and provisions, and discuss any other potentially controversial issues related to the draft order/permit package. [Note: if no comments are provided on the administrative draft Order/NPDES permit package, the draft shall be considered the final administrative draft Order/NPDES permit package.]	
	Receive Regional Water Board comments on Administrative Draft	Within 1 week after receipt
6	Incorporate Regional Water Board Comments on the Administrative Draft Order/NPDES Permit Package (as necessary), and Prepare and Deliver the Final Administrative Draft Order/NPDES Permit Package • Based on comments from EPA and the Regional Water Board, revisions to the administrative draft Order/NPDES permit package shall be made. • If necessary, a final administrative draft Order/NPDES permit package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to the appropriate Regional Water Board Manager and/or Senior.	Within 1 week after receipt of comments from EPA and Regional Water Board
7	Prepare and Deliver the Tentative Draft Order/NPDES Permit Package • Address any comments received by EPA and the Regional Water Board on the draft RPA and WQBELs or Final Administrative Draft Order/NPDES Permit Package.	Within 2 weeks after receipt of comments from EPA and the Regional Water Board

No.	Activity Description	Suggested Timeframe
	• Make any final changes/edit/etc., and prepare the Tentative Draft Order/NPDES Permit Package. • The Tentative Draft Order/NPDES Permit Package shall include all components of the administrative draft permit record, including application and supporting data, tentative draft Order/NPDES permit, documents or other items cited in tentative draft Order/NPDES permit, and any other items supporting permit development • Prepare public notice materials to transmit the Tentative Draft Order/NPDES Permit Package (transmittal letter for facility and interested parties, Notice of Public Hearing, letter to newspaper for public advertising, etc.). Formats for the public notice materials to be provided by the Regional Water Board. • The Tentative Draft Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Manager and/or Senior Engineer. • Subsequent to delivery of the Tentative Draft Order/NPDES permit package, the contractor shall schedule a conference call (as needed) or meeting with the Regional Water Board contact to discuss any significant changes or issues related to the tentative draft order/permit.	
8	Respond to Public Comments on the Tentative Draft Order/NPDES Permit Package and Prepare and Deliver the Final Tentative Draft Order/NPDES Permit Package • Assist Regional Water Board staff with Response to Comments for technical issues related to development of the permit package. • Revisions to the Tentative Draft Order/NPDES Permit Package shall be made to address the public comments received and any additional comments from EPA and the Regional Water Board contact. • A Final Tentative Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Manager and/or Senior.	Within 2 weeks after receipt of comments from EPA and the Regional Water Board
9	Develop Board Agenda Materials • Based on formats to be provided by the Regional Water Board, the contractor shall prepare materials to be used by the Regional Water Board contact for use at the Board meeting.	To be delivered concurrently with the response to comments and Final Tentative Draft Order

Specific permitting tasks will be identified by the State and Regional Water Boards and assigned to the contractor by the WACOR in writing, on not less than a quarterly basis, as indicated

above.

VIIc. DELIVERABLES REQUIRED AND SCHEDULE – PERMIT WRITING

Based on Regional Water Board requirements and applicable formats and/or language, the contractor shall conduct the pretreatment audits/inspections/program reviews and prepare inspection reports, including all materials and documents used in permit development) for each facility assigned. These draft documents shall be provided to appropriate EPA staff (the WACOR and the regional pretreatment coordinator) and State staff for review and comment, as arranged through the WACOR. Individual deliverable due dates shall be agreed with the relevant Regional Water Board, with concurrence by SWRCB and EPA.

Documents shall be submitted by E-mail to the relevant Regional Water Board pretreatment contact with a CC to the WACOR, in either .DOC or .PDF file formats and shall be accessible, functional and free from computer viruses or other technology problems.

The duplication of more than 5,000 copies of a single page or 25,000 or more total impressions is considered "printing" and, therefore, prohibited. For more information on restrictions relating to deliverables, the contractor is referred to the EPA Publication Management Guide (EPA-175-K-92-011).

SUMMARY OF DELIVERABLES AND DUE DATES			
Task/Subtask	Deliverable	Distribution	Due Date*
Task C-1-1.a	Kickoff Meeting Agenda	WACOR, SWRCB permitting liaison	Within 2 weeks of award
Task C-1-1.b.	Kickoff Meeting Summary	WACOR, SWRCB permitting liaison	Within 3 weeks of award, and no later than September 30 2017.
Task C-1-1.c	Tracking Spreadsheet	WACOR, SWRCB permitting liaison	Initial version within 2 weeks of first Technical Directive identifying permits for contractor support, then updated as new dates and information are received
Task C-1-1.c	Monthly Progress Report	WACOR, SWRCB permitting liaison	By 10th day of each calendar month, for activities during the preceding calendar month.
Task C-1-1.c	Monthly Update Call	WACOR,	Monthly after

	Follow-up	SWRCB permitting liaison	submission of Monthly Progress Reports, on a schedule to be agreed with the SWRCB.
Task C-2 (subtasks C-2-a, C-2-b, and C-2-c)	Draft NPDES Permit(s) as individually requested by State & Regional Water Boards	WACOR, assigned Regional Water Board permitting liaison, SWRCB permitting liaison	Schedule for individual permit drafts shall be as assigned in the relevant Technical Directive(s) after contractor reaches agreement with the issuing Regional Water Board.

*Note: All days are calendar days unless otherwise specified.

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task C and all sub-tasks therein is approximately 8873 hrs. The contractor can assume two (2) travel trips for all sub-tasks associated within Task C.

SCOPE OF WORK – AMENDMENT = Task D: More Permit Writing

This AMENDMENT requests more permit writing support; i.e., similar content to Task C. The type of NPDES permit support is to be determined and may include traditional NPDES permit(s) and/or may be municipal separate storm sewage system (MS4) permit(s) or portions thereof. Total estimated level of effort for Task D AMENDMENT and all sub-tasks therein is approximately 519 hrs. The contractor can assume ONE (1) travel trip for all sub-tasks associated within Task D.

This AMENDMENT contains the same components as in Task C, including Project Management (C-1) as well as Draft and Final Permit Packages and Administrative Records (C-2). Minimal effort is anticipated for Project Management (C-1) since the LOE is small; i.e., one or two permits or portions thereof. The specific permit(s) will be identified by WACOR (in communication with State Water Board contractor representative). If a permit package cannot be precisely categorized into a group based on the criteria presented in Task C-2, it shall be classified or defined by the WACOR based on best professional judgment.

VIId. AMENDMENT DELIVERABLES REQUIRED AND SCHEDULE –MORE PERMIT WRITING

This AMENDMENT requests same deliverables and due dates as presented in Task C, except the kickoff meeting summary is due no later than October 15, 2017.

VIII. CONTRACT SOW REFERENCE

See Contract SOW Page 1-10 of 14 ***Task # "Task Title", Page # - # of # Task # Task Name***

IX. ANTICIPATED TRAVEL REQUIREMENTS

All travel shall be approved in advance by the Contract-Level Contracting Officer's Representative (CL-COR) and shall be in accordance with the Contract.

X. ADDITIONAL REQUIREMENTS:

Office direct costs (ODCs) for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this delivery order without the prior written approval of the Contracting Officer.

Upon issuance of written technical direction, the Contractor shall submit for inspection of all work in progress at any time under this work assignment. The Contractor shall develop and maintain files supporting each task.

The contractor shall contact the Contracting Officer (CO) and/or the CL-CCOR by telephone to discuss any problems that may adversely affect the work on this Work Assignment. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO and the PO.

CONTRACTOR IDENTIFICATION

To avoid any perception that contractor personnel are EPA employees, the contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites.

CONTROL REQUIREMENTS

1. Quality Assurance Project Plan (QAPP):

Publishing on the NPDES website does not require a QAPP, since the people who generate the data are responsible for the data's quality, and it is their responsibility to develop a QAPP, if one is needed for their primary data uses. The contractor shall provide source references for data that is published on the website.

2A. Organizational Conflict of Interest:

The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in FAR Subpart 9.5, or that the contractor has disclosed all such relevant information. See contract clause 1552.209-71 Organization of Conflict of Interest.

2B. Notification of Conflicts of Interest Regarding Personnel:

The Contractor shall immediately notify the CL-COR and the Contracting Officer of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract, or (2) any such conflicts concerning subcontractor employees or consultants working on or having access to information regarding the contract, when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work. See Section H.4, contract clause EPAAR 1552.209-73 Notification of Conflict of Interest.
The contractor shall contact the WACOR and/or the Alternate Work Assignment Contracting Officer's Representative (Alternate WACOR) by telephone to discuss any problems that may adversely affect the work described in the PWS. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be provided via email to the WACOR with a copy to the Alternate WACOR and Contracting Officer.

3. Enforcement Sensitive Information:

The contractor recognizes that contractor employees in performing tasks specified in the PWS may have access to data/information, either provided by the government or first generated during contract performance, of enforcement sensitive nature which should not be released to the public without Environmental Protection Agency (EPA) approval. Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel, including but not limited to, subcontractor and consultant personnel

assigned to work on this contract and/or task order, or with access to materials developed pursuant to such efforts, understand that this information is confidential and any disclosure or misuse of the information may result in prosecution to the fullest extent of the law. All contractor personnel are expected to exercise due diligence in safeguarding, handling or disposing of any such information.

4. Project Employee Confidentiality Agreement

   The contractor agrees that the contractor employee will not disclose, either in whole or in part, to any entity external to the EPA, the Department of Justice, or the contractor, any information or data (as defined in FAR Section 27.401) provided by the government or first generated by the contractor under the work described in the PWS, any site-specific cost information, or any enforcement strategy without first obtaining the written permission of the EPA Work Assignment Contracting Officer's Representative (WACOR). If a contractor, through an employee or otherwise, is subpoenaed to testify or produce documents, which could result in such disclosure, the contractor must provide immediate advance notification to the EPA so that the EPA can take action to prevent such disclosure. Such agreements shall be effective for the life and for a period of five (5) years after completion of all work described in the PWS.

5. Handling of Confidential Business Information (CBI)

   Contractor's access to TSCA CBI must comply with the procedures set forth in the TSCA CBI Security Manual. Likewise, access to FIFRA CBI shall follow the security procedures set forth in the FIFRA Information Security Manual.

   To the extent that the work described in the PWS requires access to proprietary or confidential business or financial data of other companies, and as long as such data remains proprietary or confidential, the contractor shall protect such data from unauthorized use and disclosure.

   All files or other information identified as Confidential Business Information (CBI) shall be treated as confidential and kept in a secure area with access limited to only contractor personnel directly involved in the case or special project assignment. The contractor, subcontractor, and consultant personnel are bound by the requirements and sanctions contained in their contracts with the EPA and in EPA's confidentiality regulations found at 40 CFR Part 2, Subpart B. The contractor subcontractors, and consultant must adhere to EPA-approved security plans which describes procedures to protect CBI, and are required to sign non-disclosure agreements before gaining access to CBI.

   All official data, findings, and results of investigations and studies completed by the contractor shall be available for EPA and DOJ internal use only. The contractor shall not release any part of such data without the written direction of the WACOR.

6. Conferences and Workshops:

   The tasks under this work assignment may require the acquisition of "off-site" facilities for conference(s) and meetings as defined in the IPN 12-05. AND the events associated with this work assignment are covered by EPA Order 1900.3 and do require EPA Form

5170.

The contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated $20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

Any event which meets the definition of a "conference," with total net expenditures greater than $20,000, is required to submit EPA Electronic Form 5170 and Form 5170-A (with cost estimates/actuals). In the case the workflow system is down and WACORs require emergency approval, they can submit EPA Form 5170 (PDF) (2pp, 93K) (with cost estimates) to conference@epa.gov.

PERFORMANCE SURVEILLANCE PLAN

Data entry and data management shall be conducted in accordance with the procedures outlined in the 1992 Permit Compliance System (PCS) Quality Assurance Guidance Manual, and follow the 2015 Final NPDES electronic reporting rule and Appendix A of the 40 CFR 127 electronic rule. The contractor shall also follow EPA and ICIS information security guidance described in the *ICIS Rules of Behavior.*

https://www.epa.gov/compliance/permit-compliance-system-pcs-quality-assurance-guidance-manual

https://www.epa.gov/compliance/final-national-pollutant-discharge-elimination-system-npdes-electronic-reporting-rule

Task A-1

Requirement	Standard	Acceptable Quality Level
The contractor shall collect all updated permit information, including adoptions, reissuances, recessions, amendments, and modifications of permits, enforcement actions, Time Schedule Orders, and Compliance Schedule Orders.	Data is received from nine California regional boards. The contractor shall review all data and research any discrepancies.	The contractor shall thoroughly review the permit document within 7 days of receipt. All updates and corrections are to be made in ICIS-NPDES.
The contractor shall enter and update permit limits as they are adopted, reissued, rescinded, modified, or amended.	The contractor shall follow the permit coding as it is written in the permit. Clarification to any coding issues shall be researched.	Within 30 days, the contractor shall have reviewed and updated all required permit coding in ICIS-NPDES. The contractor shall ensure all data

Requirement	Standard	Acceptable Quality Level
	For unclear information, the contractor shall seek solutions and/or contact the permit writer.	is clear, correct and complete.
The contractor shall provide monthly summaries of coded permits pending issuance in ICIS-NPDES.	Permit status information is stored in ICIS-NPDES. The contractor shall review all information and correct or highlight any inconsistencies.	The summary report shall indicate pending permits, becoming effective in upcoming months and shall be provided to WACOR.
The contractor shall review the Quarterly Noncompliance Report (QNCR) and provide corrections on any Significant Non-compliance data.	The contractor shall assist the SWRCB in updating ICIS-NPDES as needed to resolve violations identified in the NNCR.	The final report shall indicate all changes and corrections made to the data to be acceptable by EPA.
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry will follow guidance provided within SWRCB QAPrP.

Task A-2

Requirement	Standard	Acceptable Quality Level
The contractor shall maintain the NPDES Permit Status Tracking List (NPST) by entering updated information for all planned permits.	The contractor shall receive and review NPDES permit application, public notice, public comment period, permit issuance, permit effective, and permit expiration dates for all permittees.	NPST shall include 100% of data to provide the contractor with updated reports on permit status including reissuance dates, and all effective and expiration dates. This shall help assess workload for future fiscal years.
The contractor shall maintain the Status Tracking to stay on top of all permit activities.	Contractor shall update tracking system as new activities are documented. Contractor shall provide report on tracking system as requested by the WACOR.	All Permit Status Tracking Reports submitted to the WACOR shall be in an excel spreadsheet to include the most current information for each individual permit.

Task A-3

Requirement	Standard	Acceptable Quality Level
The contractor shall provide training in permit coding as	Contractor shall provide guidance document and	The training shall ensure all permit coding is clear and

Requirement	Standard	Acceptable Quality Level
requested by the State Waterboard.	sample permit coding from simplistic to complex coding.	understandable by State and Regional board staff. Should there be any questionable coding issues, the contractor will be available to assist and answer questions.
Contractor shall coordinate with EPA and SWRCB to prepare a schedule with interim milestones to complete this task. This includes coordination with EPA and SWRCB to schedule the training course dates.	Schedule shall be comprehensive and well organized to accommodate milestones and time needed to complete task and sub-tasks. Schedule shall indicate training course will occur 2nd or 3rd quarter of federal FY18.	The schedule is clear and concise and accurately reflects the work to be completed. The contractor shall alert EPA and SWRCB of significant schedule changes within 5 business days. Should there be any questionable coding issues, the contractor will be available to assist and answer questions.
Contractor shall develop, review and finalize training course agenda and materials for State permit staff. Draft materials shall be reviewed by EPA and SWRCB for approval prior to training course. If other training material is available to support the training, it should be made available to SWRCB.	-Training materials shall be comprehensive regarding specific permit content to be included in ICIS database. -Information contained within the training materials shall be of sufficient detail and quality to ensure State staff are prepared review permits and accurately code/enter required info into ICIS database. -The course agenda and materials shall be complete and concise, including step-by-step process on how permit coding is done, demonstrate examples and clear comprehension of basic to complex permit coding. -The contractor shall respond to comments from EPA and SWRCB and make any revisions as needed or directed by EPA.	Training agenda and materials are submitted in accordance with the schedule developed for this task. Training materials are presented in clear, concise and accurate with no more than 5 minor errors in content, spelling and grammar. The training shall ensure all permit coding is clear and understandable by State staff. The contractor shall respond to comments from EPA and SWRCB and make any revisions within 5 business days as needed. EPA and SWRCB will review agenda and materials, provide feedback and return to contractor with comments at least 2 weeks prior to training course.
Contractor shall deliver training to EPA and State	-Contractor shall provide final training course agenda and	Training course ensure all permit coding is clear and

Requirement	Standard	Acceptable Quality Level
staff to implement NPDES permit coding requirements. Assume 3-4 day training workshop in California.	materials to EPA and SWRCB so these materials can be provided by either EPA or SWRCB to State staff in advance of training course dates. -The contractor shall conduct the training course in a clear, concise, and accurate manner, answering questions during the training course. -The contractor shall highlight information and/or ideas from the training materials that pertain to coding NPDES permits. -The contractor shall augment course with permit examples and practice sessions into ICIS. -The contractor shall conduct a brief course evaluation at the end of the training course.	understandable by SWRCB and RWQCB staff. Contractor provides at least one instructor to teach the training to State staff. At least 75% of participants who submit course evaluations report that the training meaningfully increased their understanding of NPDES permit coding into ICIS database.
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry and coding training.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry and permit coding training will follow and/or include guidance provided within SWRCB QAPrP.

Task B-1

PERFORMANCE REQUIREMENT	**PERFORMANCE STANDARD**	**ACCEPTABLE QUALITY LEVEL (AQL)**
B.1 Kick-off Meeting: The Contractor shall conduct a kick-off meeting and prepare the agenda and meeting summary.	○ Kick-off meeting shall be coordinated with all parties in a timely manner. ○ Agenda topics shall include all pertinent issues for discussion. ○ Agenda topics shall be fully addressed during the meeting. ○ Open issues shall be addressed within 5 days of meeting. ○ Meeting summary shall be	▪ The kick-off meeting is held within 3 weeks of award, and no later than September 30 2016. ▪ The draft agenda is submitted to the WACOR at least 3 days prior to the meeting. ▪ 90% of all agenda topics are fully addressed during the meeting.

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	submitted to the WACOR within 5 days of the meeting. ○ Meeting summary shall appropriately cover topics of discussion including key details and agreements.	▪ 95% of the agenda and meeting summary shall be accurate, thorough, clear, concise, and free of spelling and grammar errors.
B.2 Coordination and Planning: The contractor shall be available for discussions with the WACOR about pretreatment inspection progress and related topics.	○ The contractor shall maintain regular communications with the WACOR, the SWRCB liaison, and the Regional Water Boards' pretreatment liaisons. ○ The contractor shall notify the WACOR in a timely manner of any issues, concerns or potential schedule changes. ○ The contractor shall be responsive to WACOR inquiries. ○ Conversations with the WACOR about progress on pretreatment inspections shall be held not less than monthly (e.g. as part of monthly update calls, below), or as requested by the WACOR. ○ The contractor shall confirm in writing any significant decisions or agreements. E-mail is an acceptable medium for written confirmations.	▪ The contractor shall contact the WACOR, via telephone or email, at least once each month. ▪ The contractor shall notify the WACOR of any significant issues, concerns or potential schedule impacts within 3 days of identification. ▪ The contractor shall respond to WACOR inquiries or requests within 3 days. ▪ The contractor shall submit documentation of significant decisions or agreements to the WACOR within 3 days of interaction. ▪ 90% of the documentation shall be thorough, accurate, clear, concise and free of spelling or grammar errors.
B.3 Monthly Update Calls: The contractor shall participate in monthly update calls with EPA and the SWRCB.	○ Calls shall be held not less than monthly on a schedule agreed to between the WACOR, SWRCB representative, and the Contractor. ○ Calls shall address the status of every active (assigned but not yet completed) pretreatment inspection being worked on as listed in the Monthly Progress Report.	▪ Call schedules are confirmed by the contractor not less than 1 week in advance. ▪ No monthly update calls are missed except by prior agreement with the WACOR, and calls which are rescheduled take place within 2 weeks of the original date. ▪ 90% of calls shall successfully address all ongoing work listed in the respective Monthly

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	○ Contractor shall update the WACOR and SWRCB representative on any open issues, concerns or schedule changes; and shall be responsive to EPA and SWRCB inquiries.	Progress Report. ▪ Issues which cannot be resolved on the call itself are responded to within 5 business days 90% of the time.
B.4 Maintenance of Inspector Credentials: Contractor personnel assigned to perform pretreatment inspections shall maintain valid inspector credentials	○ All contractor personnel assigned to perform pretreatment inspections shall maintain valid inspector credentials for the duration of the period of performance.	▪ Inspector credentials for each contractor inspector shall be reviewed and confirmed during the Monthly Update Call immediately prior to the scheduled pretreatment inspection.
B.1 Tracking of Progress on Pretreatment Inspection work ("Tracking Spreadsheet"): The contractor shall maintain an accurate record of assigned work and projected interim and final dates.	○ The contractor shall prepare a tracking spreadsheet showing projected dates for the draft, review, correction and submission to Regional Water Boards of each assigned pretreatment inspection (PCI, PCA, program evaluation) and/or pretreatment training session. ○ The contractor shall ensure this spreadsheet remains up to date during performance of the TO. ○ The spreadsheet shall be in .XLS or .XLSX format and based on the template provided	▪ Initial Tracking Spreadsheet shall be crafted within 2 weeks of receiving the first Technical Directive assigning specific pretreatment inspection targets and shall be no less than 95% accurate. ▪ Updates to the Tracking Spreadsheet shall be made within 3 days of new Technical Directives or schedule changes made by the Regional Water Boards, at which point updated copies shall be sent to the WACOR and SWRCB. ▪ Spreadsheet meets the format specified.
B.2 Monthly Progress Reports: The contractor shall prepare and submit a report on pretreatment inspection progress during each month.	○ Inspection status shall be reflected in, and consistent between, the monthly invoices and the monthly progress reports. ○ The monthly progress report document shall concisely and accurately detail current status on each pretreatment	▪ There shall be no discrepancies between monthly progress reports and submitted invoices in 95% of cases. ▪ 95% of monthly progress reports shall contain all the required information for assigned pretreatment

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	inspection, including progress, projected dates, major issues encountered, and upcoming milestones. o A report shall be submitted by the 10th day of each calendar month, covering activities during the previous calendar month. o The Monthly Progress Report shall distinguish between the Regional Water Boards when reporting work which has been conducted. o The progress report shall include an up-to-date version of the Tracking Spreadsheet, with highlighting for any changes made in the previous month to scheduled dates.	inspections whose status has changed. ▪ 95% of monthly progress reports are delivered by the 10th-day-of-next-month deadline. ▪ Progress Reports are organized to distinguish between work performed for each regional board ▪ Progress reports highlight major issues with each pretreatment inspection (if any), particularly issues which affect multiple pretreatment programs or multiple regional water boards. ▪ 95% of included Tracking Spreadsheets have correct highlighting of all changed dates, with notes on the cause of each change.
B.3 Itemized Invoices: Monthly invoices shall identify and distinguish work completed for each Regional Water Board separately.	o Monthly invoices shall include a list, by Regional Water Board, of all pretreatment inspections worked on in the preceding month and their status as of the date of the invoice.	▪ 100% of invoices are properly itemized in this fashion. 95% of invoices are found to be accurate when compared to which deliverables have been received by the WACOR.
B.4 Submission Requirements: The WACOR and SWRCB shall be copied on all significant submissions of documents, including submission of draft and final pretreatment inspection documents (deliverables) to the Regional Water boards.	o The WACOR and SWRCB representative shall receive copies of all draft and final pretreatment inspection documents prepared by the contractor at the same time as these deliverables are sent to the relevant Regional Water Board. o Documents shall be in either .DOC, .DOCX, or .PDF file formats (for text) or .XLS or .XLSX format (for spreadsheets) o Documents shall be accessible,	▪ 95% of submissions are appropriately copied to the WACOR and SWRCB representative upon submission, and all other submissions reach the WACOR and SWRCB representative within 3 days of being identified. ▪ 100% of submitted documents conform to the formats listed ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	functional and free from computer viruses or other technology problems.	virus-protection software, and checked for functionality (no corrupted files, etc.).
QA/QC Plan	If needed develop QA/QC plan for relevant pretreatment inspection reports. Need will be determined as part of kick-off meeting, or as additional pretreatment inspections are assigned.	If needed QA/QC plan must meet standards of EPA QC Section *(EPA QA/R-5).* QA performance shall be in conformance with the *Office of Water Quality management Plan of 2001.*

Task B-2

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 2.A: Conduct Pretreatment Compliance Audits (PCAs).	Audits shall include assessment of compliance by POTW, assessment of compliance by industrial users discharging to the POTW, and assessment of POTW's status regarding the Pretreatment Audit and Inspection Focus Topics. Audit results shall be entered into ICIS within 10 days of conclusion of field activities / site visit.	Audits cover all required components and follow the procedures outlined in the EPA audit guidance manual (EPA 833/B-86-100, July 1986). ICIS entries are consistently prepared in a timely fashion.
Task 2.B: Prepare Audit Reports and submit to EPA and the State.	Audit reports shall comply with the format specified in the EPA guidance https://www3.epa.gov/npdes/pubs/final_pca_checklist_and_instructions_%20feb2010.pdf and shall be submitted on the schedule agreed to, and documented in, the latest approved tracking spreadsheet.	Not less than 95% of the time, audit reports shall contain all required elements, are technically accurate and professionally written and proofread, and are delivered on the agreed schedule.

Task B-3

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 3.A: Conduct Pretreatment	PCIs shall include assessment of compliance by POTW, assessment of compliance by	PCIs include all required components and follow the procedures outlined in the EPA

Compliance Inspections (PCIs).	industrial users discharging to the POTW, and assessment of POTW's status regarding the Pretreatment Audit and Inspection Focus Topics. Inspection results shall be entered into ICIS within 10 days of conclusion of field activities / site visit.	audit guidance manual (EPA 833/B-86-100, July 1986). ICIS Entries: 95% of Inspection results are entered into ICIS in accordance with the timeliness requirements in the Performance Standard. 98% of the data entered into ICIS is complete and accurate as of the time it is entered.
Task 3.B: Prepare PCI Inspection Reports and submit to EPA and the State.	Inspection reports shall include all inspection results for each required component assessed during the PCIs. Inspection reports shall comply with the format specified in Chapter 9 of the EPA Compliance Inspection manual https://www.epa.gov/sites/production/files/2013-09/documents/npdesinspect_0.pdf and shall be submitted on the schedule agreed to, and documented in, the latest approved tracking spreadsheet.	Not less than 95% of the time, PCIs reports shall contain all required elements, are technically accurate and professionally written and proofread, and are delivered on the agreed schedule.

Task B-4

PERFORMANCE REQUIREMENT	**PERFORMANCE STANDARD**	**ACCEPTABLE QUALITY LEVEL (AQL)**
Task 4: Conduct evaluations of components of new pretreatment programs and prepare evaluation reports for EPA and State review.	Evaluations shall focus on the assigned component(s) and adequately summarize and document the suitability of those pretreatment program components for regulatory compliance in accordance with the following EPA guidance documents: Guidance Manual for POTW pretreatment program development https://www3.epa.gov/npdes/pubs/owm0003.pdf Pretreatment Program legal authority review checklist	Evaluations are found adequate and useful for EPA and State pretreatment oversight on an individual basis. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the direction of EPA. ▪ 100% of submitted documents conform to the listed guidance documents. ▪ Before submission, all documents are scanned for viruses, harmful macros, and

	https://www3.epa.gov/npdes/pubs/pretreatment_legal_checklist.pdf Local Limits Development guide: https://www3.epa.gov/npdes/pubs/pretreatment_local_limits.pdf Enforcement Response Guidance: https://www3.epa.gov/npdes/pubs/owm0015.pdf	similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).

Task B-5

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 5: Conduct evaluation(s) of new pretreatment programs and prepare evaluation reports for EPA and State review.	Evaluations shall contain a thorough overview of the assigned pretreatment program(s) and adequately summarize and document the suitability of those pretreatment program components for regulatory compliance in accordance with the following EPA guidance documents: Guidance Manual for POTW pretreatment program development https://www3.epa.gov/npdes/pubs/owm0003.pdf Pretreatment Program legal authority review checklist https://www3.epa.gov/npdes/pubs/pretreatment_legal_checklist.pdf Local Limits Development guide: https://www3.epa.gov/npdes/pubs/pretreatment_local_limits.pdf Enforcement Response Guidance: https://www3.epa.gov/npdes/pubs/owm0015.pdf	Evaluations are found adequate and useful for EPA and State pretreatment oversight on an individual basis. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the direction of EPA. ▪ 100% of submitted documents conform to the listed guidance documents. ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).

Task B-6

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 6: Conduct pretreatment training for state staff.	-Course materials shall be delivered on the schedule agreed with EPA and the SWRCB. -Content of course materials shall be approved in advance by EPA. -Course evaluations shall be	Course Materials are delivered on the agreed schedule and address the topics requested by EPA and SWRCB. Evaluations are returned from at least 50% of class participants, and

	solicited from all attendees and return at least 80% favorable response rate.	at least 80% of those participants report the class to have improved their understanding of pretreatment implementation.

Task C-1

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
1.A.1 Kick-off Meeting: The contractor shall conduct a kick-off meeting and prepare the agenda and meeting summary.	○ Kick-off meeting shall be coordinated with all parties in a timely manner. ○ Agenda topics shall include all pertinent issues for discussion. ○ Agenda topics shall be fully addressed during the meeting. ○ Open issues shall be addressed within 5 days of meeting. ○ Meeting summary shall be submitted to the WACOR within 5 days of the meeting. ○ Meeting summary shall appropriately cover topics of discussion including key details and agreements.	▪ The kick-off meeting is held within 3 weeks of Task Order award, and no later than September 30 2017. ▪ The draft agenda is submitted to the WACOR at least 3 days prior to the meeting. ▪ 90% of all agenda topics are fully addressed during the meeting. ▪ 95% of the agenda and meeting summary shall be accurate, thorough, clear, concise, and free of spelling and grammar errors.
1.A.2 Coordination and Planning: The contractor shall be available for discussions with the WACOR about permit issuance progress and related topics.	○ The contractor shall maintain regular communications with the WACOR, the SWRCB liaison, and the Regional Water Boards' permitting liaisons. ○ The contractor shall notify the WACOR in a timely manner of any issues, concerns or potential schedule changes. ○ The contractor shall be responsive to WACOR inquiries. ○ Conversations with the WACOR about progress on permit drafting shall be held not less than monthly (e.g. as part of monthly update calls, below), or as requested by the WACOR.	▪ The contractor shall contact the WACOR, via telephone or email, at least once each month. ▪ The contractor shall notify the WACOR of any significant issues, concerns or potential schedule impacts within 3 days of identification. ▪ The contractor shall respond to WACOR inquiries or requests within 3 days. ▪ The contractor shall submit documentation of significant decisions or agreements to the WACOR within 3 days of interaction. ▪ 90% of the documentation shall be thorough, accurate, clear, concise and free of

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	○ The contractor shall confirm in writing any significant decisions or agreements. E-mail is an acceptable medium for written confirmations.	spelling or grammar errors.
1.A.3 Monthly Update Calls: The contractor shall participate in monthly update calls with EPA and the SWRCB.	○ Calls shall be held not less than monthly on a schedule agreed to between the WACOR, SWRCB representative, and the contractor. ○ Calls shall address the status of every active (assigned but not yet completed) permit being worked on under the Task Order, as listed in the Monthly Progress Report. ○ Contractor shall update the WACOR and SWRCB representative on any open issues, concerns or schedule changes; and shall be responsive to EPA and SWRCB inquiries.	▪ Call schedules are confirmed by the contractor not less than 1 week in advance. ▪ No monthly update calls are missed except by prior agreement with the WACOR, and calls which are rescheduled take place within 2 weeks of the original date. ▪ 90% of calls shall successfully address all ongoing work listed in the respective Monthly Progress Report. ▪ Issues which cannot be resolved on the call itself are responded to within 5 business days 90% of the time.
1.B.1 Tracking of Progress on Permit Issuance ("Tracking Spreadsheet"): The contractor shall maintain an accurate record of assigned work and projected interim and final dates.	○ The contractor shall prepare a tracking spreadsheet showing projected dates for the draft, review, correction and submission to Regional Water Boards of each assigned permit ○ The contractor shall ensure this spreadsheet remains up to date during performance of the TO. ○ The spreadsheet shall be in .XLS or .XLSX format and based on the template provided	▪ Initial Tracking Spreadsheet shall be crafted within 2 weeks of receiving the first Technical Directive assigning specific permits and shall be no less than 95% accurate. ▪ Updates to the Tracking Spreadsheet shall be made within 3 days of new Technical Directives or schedule changes made by the Regional Water Boards, at which point updated copies shall be sent to the WACOR and SWRCB. ▪ Spreadsheet meets the format specified.
1.B.2 Monthly	○ Permit Writing status shall be	▪ There shall be no

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Progress Reports: The contractor shall prepare and submit a report on permit-writing progress during each month.	reflected in, and consistent between, the monthly invoices and the monthly progress reports. ○ The monthly progress report document shall concisely and accurately detail current status on each permit, including progress, projected dates, major issues encountered, and upcoming milestones. ○ A report shall be submitted by the 10th day of each calendar month, covering activities during the previous calendar month. ○ The Monthly Progress Report shall distinguish between the Regional Water Boards when reporting work which has been conducted. ○ The progress report shall include an up-to-date version of the Tracking Spreadsheet, with highlighting for any changes made in the previous month to scheduled dates.	discrepancies between monthly progress reports and submitted invoices in 95% of cases. ▪ 95% of monthly progress reports shall contain all the required information for permits whose status has changed. ▪ 95% of monthly progress reports are delivered by the 10th-day-of-next-month deadline. ▪ Progress Reports are organized to distinguish between work performed for each regional board ▪ Progress reports highlight major issues with each permit, particularly any issues which affect multiple permits or multiple regional water boards. ▪ 95% of included Tracking Spreadsheets have correct highlighting of all changed dates, with notes on the cause of each change.
1.B.3 Itemized Invoices: Monthly invoices shall identify and distinguish work completed for each Regional Water Board separately.	○ Monthly invoices shall include a list, by Regional Water Board, of all permits worked on in the preceding month and their status as of the date of the invoice.	▪ 100% of invoices are properly itemized in this fashion. 95% of invoices are found to be accurate when compared to which deliverables have been received by the WACOR.
1.B.4 Submission Requirements: The WACOR and SWRCB shall be copied on all significant submissions of documents, including submission of draft and final permits (deliverables) to the	○ The WACOR and SWRCB representative shall receive copies of all draft and final permits prepared by the contractor at the same time as these deliverables are sent to the relevant Regional Water Board. ○ Documents shall be in either .DOC, .DOCX, or .PDF file	▪ 95% of submissions are appropriately copied to the WACOR and SWRCB representative upon submission, and all other submissions reach the WACOR and SWRCB representative within 3 days of being identified. ▪ 100% of submitted documents

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Regional Water boards.	formats (for text) or .XLS or .XLSX format (for spreadsheets) o Documents shall be accessible, functional and free from computer viruses or other technology problems.	conform to the formats listed ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).
QA/QC Plan	If needed develop QA/QC plan for relevant permits. Need will be determined as part of kick-off meeting, or as additional permits are assigned.	If needed QA/QC plan must meet standards of EPA QC Section *(EPA QA/R-5).* QA performance shall be in conformance with the *Office of Water Quality management Plan of 2001.*

Task C-2

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 2 (all subtasks): Prepare draft NPDES permits - As listed in the table above, complete contractor activities 1, 2, 3, and 7, plus the specified number of additional contractor activities as directed in each subtask above.	o Draft documents (RPAs, issue papers, permit drafts, administrative drafts etc.) shall be submitted in accordance with the schedule above, starting on the date a facility is assigned as part of a Technical Directive from the WACOR. o Permit drafts shall be delivered on or before the designated submission date agreed with the Regional Water Board. o Permit drafts shall be substantially free from factual or regulatory errors, and require only minimal revision by the issuing Water Board o Draft permits must be professionally written and carefully edited and proofread o All permitting drafts must be in full compliance with all applicable laws. o Documents shall be in either	▪ Permit drafts and other permit components shall be delivered on time, relative to the schedule listed in Table 1, 100% of the time unless prior arrangements for alternate schedules are made with the Regional Water Board before the final due date. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the discretion of the Regional Water Board. ▪ 100% of submitted documents conform to the formats listed. ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	.DOC, .DOCX, or .PDF file formats (for text) or .XLS or .XLSX format (for spreadsheets) o Documents shall be accessible, functional and free from computer viruses or other technology problems.	software, and checked for functionality (no corrupted files, etc.).
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry and coding training.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry and permit coding training will follow and/or include guidance provided within SWRCB QAPrP.

PERFORMANCE SURVEILLANCE PLAN			
Performance Requirement	**Measurable Performance Standards**	**Surveillance Methods**	**Incentives/Disincentives**
Management and Communications: During the life of this work assignment, the Contractor shall notify EPA immediately of any issues that may impact the timeliness of deliverables of the problems associated with the development of deliverables.	The Contractor shall maintain contact with the WACOR throughout the performance of the work assignment. The contractor shall identify to the WACOR any delays with regard to deliverables not less than one week prior to the deliverable date that has been established in the work assignment or technical direction document. The contractor shall identify to the WACOR any issues or concerns that have a direct impact on project schedules within three (3) days of occurrence. The contractor shall provide options for EPA's consideration on resolving or mitigating the impacts identified.	WACOR and CL-COR (as necessary) will allocate the time needed to discuss and address all issues identified by the Contractor. The WACOR and CL-COR will document and maintain a complete record of the issues, agreements and outcome. The WACOR and CL-COR will review monthly progress reports for indicators of problems not previously mentioned. The WACOR will also monitor the timely receipt of deliverables. For those that are late without prior notice, the EPA will formally document to the Contracting Officer the late delivery.	If the contractor fails to implement corrective actions after EPA identifies and provided written documentation of performance issues, EPA will rate this performance category "unsatisfactory." If three or more the active work assignments for the period are rated unsatisfactory, EPA will rate the Business Relations category as unsatisfactory in the CPARS Contract Performance System.

Cost Management and Control: The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where practical.	The Contractor shall monitor, track and accurately report level of effort, labor cost, other direct cost and fee expenditures to EPA through monthly progress reports and approved special reporting requirements. The Contractor shall assign appropriately leveled and skilled personnel to all tasks. The contractor should not exceed established work assignment ceilings and, in general, should expend dollars and hours at similar ratios. If either the expenditure of hours or dollars deviates significantly, the contractor shall provide an explanation in its Monthly Progress Report.	The CL-COR will routinely meet with the Contractor's Project Manager to discuss the work progress and contract and individual work assignment level expenditures. The CL-COR and WACOR shall review the Contractor's monthly progress reports and request the Work Assignment Contracting Officer's Representative to ensure that ceilings are not exceeded, that progress is being made, and that the contractor is effectively utilizing the LOE provided under the work assignment.	EPA will thoroughly review work assignment funding ceiling overruns to determine the contractor's ability to control the situation. If EPA determines that the contractor failed to control cost, the contractor will be rated "unsatisfactory" in this category. Multiple incidents of work assignment overrun that result in an overall cost overrun of greater than 4% of the approved total work assignment funding for the current contract period, will result in an unsatisfactory rating in the CPARS Contract Performance System.
Quality of Product/Services: The contractor shall ensure documents developed under this task order are quality products that are factual and based on sound science and engineering principles.	Products delivered under this work assignment must not contain any major factual errors. The analyses provided in each product shall be logical, consistent, and defensible.	The WACOR will review all documents delivered under this work assignment for content accuracy.	If EPA determines that the contractor's analyses is factually inaccurate or if significant technical errors are found in any documents produced by the contractor, EPA may determine that the cost associated with redoing the work shall be borne by the contractor. Multiple incidents of this nature under the contract will result in an unsatisfactory rating for Quality and Manage Control being reported to the CPARS Contract Performance System.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 1-67

☐ Other ☒ Amendment Number: 000002

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2018 Base Option Period Number 1	ICIS NPDES

Contractor: EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW: See PWS

Purpose:
- ☐ Work Assignment
- ☒ Work Assignment Amendment
- ☐ Work Plan Approval
- ☐ Work Assignment Close-Out
- ☐ Incremental Funding

Period of Performance: From 02/06/2018 To 06/30/2018

Comments:
This Amendment 2 contains modifications to existing tasks (Task B, C and D); adds two new tasks (Task E and F); removes some deliverables in Task C; and translates the equivalent contractor level of effort to accomplish all modifications, new tasks and deliverables.

☐ Superfund — Accounting and Appropriations Data — ☒ Non-Superfund

Note: To report additional accounting and appropriations date use EPA Form 1900-69A.

SFO (*Max 2*) ☐

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period: 07/01/2016 To 06/30/2018 Cost/Fee: LOE:

This Action:

Total:

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee LOE:

Cumulative Approved: Cost/Fee LOE:

Work Assignment Manager Name Peter Kozelka (Signature) (Date)	Branch/Mail Code: Phone Number: 415-972-3448 FAX Number:	
Project Officer Name Tangela Cooper (Signature) (Date)	Branch/Mail Code: Phone Number: 202-566-0369 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) (Date) 2/6/2018	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 1-67
AMENDMENT 2

TITLE: Technical Support for California NPDES program

Task A: Data Entry into the Integrated Compliance Information System-NPDES (ICIS-NPDES) Support

Task B: Pretreatment Inspection Support

Task C: Permit Writing Support

Task D: Amendment 1 – more permit writing support

Amendment 2: See page 22
Modification to Task B (more Pretreatment inspections)
Modification to Task C (less permit writing deliverables)
Modification to Task D (adding Los Angeles MS4 technical support)
Adding Task E: Inspection Training
Adding Task F: Municipal stormwater workshop support

WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):

Peter Kozelka
EPA Region 9
75 Hawthorne St. Mail Code: WTR 2-3
San Francisco, CA 94105
(415) 972-3448
kozelka.peter@epa.gov

ALTERNATE WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (AWACOR):

Pascal Mues
EPA Region 9
75 Hawthorne St. code: WTR 2-3
San Francisco, CA 94105
(415) 972-3768
mues.pascal@epa.gov

PERIOD OF PERFORMANCE: February 6, 2018 through June 30, 2018

BACKGROUND

The Clean Water Act (CWA) authorized efforts to restore and maintain the Nation's waters, including Section 402 of the Act specifically created of the National Pollutant Discharge Elimination System (NPDES) permit program to regulate and reduce the point source pollution. Point sources must obtain a discharge permit from the proper authority, including states, tribes, and territories. EPA Regions are responsible for implementing the NPDES permit program in non-delegated States and for federal and tribal dischargers in authorized States. The State of California is authorized to operate the NPDES program through the State Water Resources Control Board and nine Regional Water Boards.

EPA maintains the Integrated Compliance Information System-NPDES (ICIS-NPDES) as the national database of record for the NPDES program, and all states with NPDES delegation are required to enter their NPDES permit-related data into ICIS-NPDES. EPA Region 9 has historically utilized contractor support to support California's NPDES data requirements in ICIS-NPDES. EPA Region 9 has also previously provided technical support to facilitate permit development and issuance in California, including pretreatment inspections, program reviews, permit writing, training and specialized technical assistance to ensure protection of receiving water quality. Contractor support to be performed represents part of EPA's technical support to the State of California's NPDES program.

PURPOSE AND OBJECTIVE

The contractor shall, in consultation with EPA, provide technical support of California's NPDES permit program for three tasks: data entry in ICIS-NPDES, pretreatment inspections and permit writing.

Data entry and training will support EPA Region 9 and California data entry and reporting using the NPDES Permit Status Tracking List (NPST), which the State and EPA Region 9 use to assist in tracking NPDES permitting activities.

Pretreatment inspections and related activities will support one aspect of California's NPDES program to control nondomestic wastewater that is discharged to municipal sanitary sewer systems; also known as publicly owned treatment works (POTWs). The contractor shall provide technical assistance in pretreatment.

Permit writing support will include preparing draft individual permits, selected permit components, and/or generating standardized NPDES permit language to meet the needs of the State of California and ensure compliance with the Clean Water Act and other applicable federal laws. EPA may also ask contractor to provide specialized technical assistance on various NPDES topics, such as impacts evaluation of cooling water intake structures, dilution allowances, or thermal impact evaluations. The work to be performed may include providing technical and policy evaluations for specific NPDES permits or for issues that are relevant to many NPDES permits.

ASSUMPTIONS AND CONSTRAINTS

For all three tasks, the contractor shall possess and exercise a comprehensive understanding of the Clean Water Act, the Porter-Cologne Act, and all other relevant federal and state water protection laws; the skills and tools necessary to conduct pretreatment audits, inspections, and programmatic reviews, and a thorough appreciation of California's regulatory programs and practices in Clean Water Act – NPDES permitting.

The contractor is authorized to contact the SWRCB and Regional Water Boards directly to obtain additional information but shall copy EPA on all information requests and document all requests and responses for EPA. The contractor shall inform the EPA Work Assignment Contracting Officer's Representative (WACOR) of any such information requirements. The contractor shall only follow technical direction received from the WACOR.

Permitting writing assignments may shift over the course of performing work as the needs of individual Regional Water Boards change, but the work performed will be for a predetermined number of permits in each of three (3) levels of complexity and support required. The number of permits for each level of complexity, and what tasks are anticipated under each level, are listed below under Task C. Specific permits on which assistance is to be provided will be identified to the contractor in a technical directive by the EPA Work Assignment Contracting Officer's Representative (WACOR), along with applicable NPDES permit number.

If travel to and from California locations is required for these tasks, it should be limited to a reasonable number of trips, not to exceed fifteen (15), unless staff conducting the trip(s) are locally based.

The contractor shall demonstrate an understanding of, and follow, all applicable laws, regulations and policies.

The contractor shall ensure compliance with Agency standards.

The work described under this PWS may be extended by additional one-year option periods, provided that: (1) the Government has a need for continued performance, (2) the contractor has achieved acceptable quality levels, and (3) the contractor receives notice of the availability of funding. Note: Exercise of the additional one-year option periods are contingent upon meeting contract level award term requirements. The Government can unilaterally exercise an option if notification to exercise the option is provided to the contractor within 30-60 days prior to the end of the current period performance. If the Government provides notification to exercise the option in less than 30 days prior to the end of the current period of performance, exercise of the option is negotiated bilaterally.

SCOPE OF WORK

This PWS describes services required to support EPA Region 9 to carry out all tasks delineated below within the context of the NPDES permitting requirements of the Clean Water Act. The contractor shall perform all activities in a manner consistent with all federal data requirements safeguarding the relationship between the federal government and the State of California.

TASK A-1: Data Entry for NPDES Permits into ICIS-NPDES

The contractor shall support EPA Region 9 in entering NPDES permit data into ICIS-NPDES. The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCB) will send copies of recently issued NPDES permit actions, including permit adoptions, reissuances, and modifications, enforcement actions, Time Schedule Orders, Compliance Schedule Orders, recessions, and amendments directly to the contractor. The contractor shall enter all permitting data pertaining to Appendix A of the electronic rule that is available within the permit documentation, including, but not limited to, permit facility, permit tracking, and permit limits. For the purposes of the cost estimate, the contractor shall assume 120 (approximately 60 major and 60 minor) NPDES permits will be issued and provided for input to ICIS-NPDES. The contractor will not be responsible for General Permits; however, will enter all basic permitting information.

EPA will supply the State Water Resource Control Board (SWRCB) and contractor with the Quarterly Non-Compliance Report (QNCR). The contractor shall review and provide QNCR data support to California during the time period of the unofficial Reportable Non-Compliance (RNC) Run, generally November, February, May, and August of each fiscal year. The contractor shall support the SWRCB with ICIS-NPDES database updates as needed for permits in a Non-Compliance status. The contractor shall make any required data updates to the ICIS-NPDES database as requested by the SWRCB.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task A-1 data entry.

TASK A-2: Support for Tracking NPDES Permit Issuance in the NPDES Permit Status Tracking List

The Web-based NPDES Permit Status Tracking List (NPST) was designed to assist in effectively managing the NPDES permit issuance process in California. NPST utilizes NPDES permit application, public notice, public comment period, permit issuance, permit effective, and permit expiration dates for all permittees. From this information NPST will report schedules for permit reissuance, track permit reissuance progress (including interim milestones), and support estimates for permit issuance workloads and resources for future fiscal years. The system will provide automated summary tables and charts to assist in providing updates to NPDES permit issuances.

Under this task, the contractor shall provide support in maintaining NPST to assist work planning between the SWRCB and the nine RWQCBs. Specifically, the contractor shall be required to extract relevant data and information from ICIS-NPDES subsequent to permit adoption (issuance). The types of information that must be extracted include:

- NPDES Permit Number, Permit Name, Facility Name; and
- NPDES application, public notice, public comment period, permit issuance, effective, and expiration dates.

The contactor shall also retrieve from the SWRCB and the nine RWQBs additional permit information not contained in the ICIS-NPDES system and enter it into the NPST. The additional information includes:

- Order Numbers as assigned to individual permits by the SWRCB and nine RWQBs; and
- The detailed list of proposed permit reissuances/adoptions for the fiscal year.

The contractor shall follow the approach and procedures for providing support for tracking NPDES permit issuance that are currently used to support the NPDES program effort in California. The specific procedures and protocols were developed to ensure high quality data is maintained within NPST. The specific approach is summarized briefly below:

- The contractor will receive copies of adopted Orders (NPDES individual, general and MS4 permits) from SWRCB and each of the nine RWQCBs. After receipt, the contractor shall ensure all copies are dated and logged into a document control system. Electronic copies with electronic signature posted online by SWRCB and RWQCBs are acceptable as are hard copies with original signatures.

- After receipt from SWRCB or a RWQCB, the contractor shall enter the relevant (NPDES individual, general and MS4) permit information in the ICIS-NPDES database. Monthly, the contactor shall extract the relevant permit information from the ICIS-NPDES database and update the NPST data.

- The contractor shall collect from the SWRCB and/or RWQCB permit scheduling event dates including; planned issuance date, and public comments due date for entry to NPST.

- This NPDES Permit Tracking System (NPTS) shall contain at a minimum: permit/document received date, permit/document coding date, and an email notification to EPA and SWRCB of coding completion. NPTS will be made available to EPA Region 9, SWRCB and RWQCBs at all times during the performance of assigned tasks.

For the purposes of the cost estimate, the contractor shall assume 120 NPDES permits (60 major and 60 minor) will be provided for data extraction.

TASK A-3: Permit Coding Training

The contractor shall work closely with EPA and SWRCB to develop training workshop and training materials for State staff regarding permit coding/data entry to ICIS-NPDES. Contractor shall work with EPA, SWRCB and RWQCB staff to schedule the training to maximize staff participation. Contractor shall provide training to participants, assume 3-4 days for training course held in California between January and July 2018.

The contractor will develop and propose training agenda and guidance materials on permit coding. Primary topic is NPDES permit coding which entails reviewing and understanding final permits and then coding/entering information into ICIS database to fulfill NPDES program requirements. Training agenda and materials shall be thorough and comprehensive to ensure

State staff will be able to code NPDES permits themselves. Preferably, training course will include hands-on exercise in reviewing a permit and performing permit coding into ICIS database. Schedule shall include sufficient time for EPA and SWRCB to review and provide comments to the contractor on the proposed agenda and contents prior to contractor delivering the training course.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task A-3 permit coding training.

DELIVERABLES REQUIRED AND SCHEDULE – DATA ENTRY

Deliverables: The contractor shall reflect a thorough understanding of national and State statutes, regulations, court rulings, policy and guidance. Final deliverables shall be consistent with the acceptance criteria described above, and will reflect any comments from EPA. Additionally, all final deliverables shall be of superior editorial quality. The contractor shall provide quality assurance reporting as specifically identified by the EPA Work Assignment Contracting Officer's Representative (WACOR).

Deliverable Description	Delivery Date
Task A-1	
NPDES permit number and application/NOI received, permit issuance, effective, and expiration dates entered into ICIS-NPDES	Within 7 days following receipt of permit document from SWRCB, RWQCB, or WACOR.
Permitted features, permit limits, and monitoring requirements, extracted and entered into ICIS-NPDES.	Within 30 days following receipt of permit, amendment or modification from SWRCB, RWQCB, or WACOR.
Enforcement actions and associated limits extracted and entered into ICIS-NPDES.	Within 30 days following receipt of enforcement document from SWRCB, RWQCB, or WACOR.
Pending Permits report generated and provided to WACOR.	One week prior to beginning of month.
Reissuance of pending permits finalized in ICIS-NPDES.	On effective date of permit or first business day following effective date.
Task A-2	
Permit Status Tracking Report of NPDES individual, MS4, and general permits with issuance scheduling status, updated with ICIS-NPDES event and state scheduling event dates.	Updated within first 7 days of each month.
NPDES permit number, application, public notice, permit issuance, effective, and expiration dates entered into ICIS-NPDES and synchronized with data in NPST.	Within 7 days following receipt of application/NOI and public notice date information, or permit document from SWRCB, RWQCB, or WACOR.

Deliverable Description	Delivery Date
Permit scheduling event dates for: planned issuance date and public comments due date for entry to NPST.	Updated within first 7 days of month for the Permit Status Tracking Report with information from SWRCB and/or RWQCB.
Task A-3	
Schedule for training task	Within 2 months of the SWRCB request, the contractor shall provide final schedule for training task.
Training course agenda and materials (draft and final)	Training agenda and materials should be submitted to EPA and SWRCB with sufficient time for review and revisions prior to training course.
Training course (approx. 3-4 days; presented in California)	Training course should be accomplished within the second to third quarter of the Federal fiscal year. (January-June 2018)

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task A and all sub-tasks therein is approximately 1872 hrs. The contractor may assume one (1) travel trips for all sub-tasks associated within Task A.

SCOPE OF WORK – Task B: Pretreatment Support

Task B-1: Pretreatment Project Management

1.A. Project Administration: The contractor's responsibilities shall include regular coordination with the WACOR, the State Water Resources Control Board (SWRCB), and relevant Regional Water Boards to ensure preparation of pretreatment inspections and reviews which are compliant with state and federal law, on a schedule which meets the needs of these Water Boards.

1.A.1. Kick-off Meeting: An initial kick-off meeting for the contractor to meet with the WACOR and SWRCB oversight team. The objective of the kickoff is to provide a review of scope of pretreatment inspection tasks for the year which may be assigned to the contractor. This meeting may take place in person or via video- or teleconference. The agenda and meeting notes shall be prepared by the contractor, and the agenda shall identify any information the contractor will need to receive from EPA or the SWRCB to begin work. The draft agenda shall be submitted to the WACOR at least three days prior to the meeting.

1.A.2. Coordination and Planning: The contractor shall be available for routine communication, planning and coordination with the WACOR and EPA Technical Expert, on California statewide and discharger-specific pretreatment issues. The contractor shall confirm in writing any significant decisions or agreements made during these interactions. These interactions will take place at least once a month

(possibly as part of the Monthly Update Calls, see next), or as needed during normal business hours, via telephone, email, skype, video conferencing or in person.

1.A.3. Monthly Update Calls: The contractor shall participate in update calls, to be held on a frequency not less than monthly, with the WACOR and the EPA Technical Expert to detail progress on each active work project (pretreatment inspection, report, or training), to identify and correct problems, and provide feedback on pretreatment issues in individual areas. These calls shall be structured as an item-by-item review of the Progress Report and associated Tracking Spreadsheet.

1.A.4. Maintenance of Inspector Credentials: As conducting on-site pretreatment inspections requires appropriate credentialing as EPA-affiliated inspectors, all contractor personnel assigned to perform such inspections shall maintain valid inspector credentials for the duration of the period of performance.

1.B. Tracking and Reporting: The contractor shall ensure EPA and the SWRCB remain fully informed about the contractor's activities, and approve of those activities, through the following measures:

1.B.1. Tracking of progress on pretreatment inspections and report issuance: The contractor is required to track each pretreatment inspection report during the development process. The contractor shall maintain an up-to-date record of progress on all work assigned, including projected draft, review, correction and submission dates, in an electronic tabular format (hereafter referred to as the "Tracking Spreadsheet") based on the provided example. This information, particularly changes in target dates, will be shared with the WACOR during the monthly update calls and as part of the monthly progress reports, both described below. The contractor is required to submit the report electronically in a table format that includes each of the specific projected dates above, as well as timelines for completion of all final pretreatment report packages.

1.B.2. Monthly Progress Reports: The contractor shall prepare and submit a report on pretreatment-inspection progress during a given month, by the 10th day of the following month. This Progress Report shall be sent to the WACOR and the designated contact at the SWRCB, and shall take the form of an E-mail or similar communication enabling sharing of digital files. The Report shall contain a separate section on work in each Regional Water Board, and shall discuss in writing any changes in target dates, the grounds for those changes, and major issues encountered, with special emphasis on any issues affecting more than one Regional Board. Attached to the E-mail and integral to the Progress Report shall be a copy of the most recent version of the Tracking Spreadsheet. Projected dates which have changed since the previous Monthly Progress Report shall be highlighted in the spreadsheet.

1.B.3. Itemized Invoicing: Each monthly invoice to EPA shall include a list, itemized by Regional Water Board, of all pretreatment inspections and reports worked on for each regional board in the preceding month and the status of each inspection and/or report as of the date of the invoice.

1.B.4. Submission Requirements: Tracking Spreadsheets, Monthly Progress Reports, and other significant communications or submissions of deliverables shall be sent by E-mail to the WACOR with CCs to the EPA Technical Expert. Documents shall be in

either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

Task B-2: Pretreatment Program Audits

The contractor shall support EPA Region 9 in conducting on-site pretreatment program audits (PCAs) and submitting written audit reports on the findings, as listed below. For the purposes of the cost estimate, the contractor shall assume approximately 11 (~~9~~) Pretreatment Program Audits will be conducted. In preparation for each audit, EPA Region 9 or the State will furnish the contractor with all applicable background documents (e.g., permit and fact sheet, latest annual report, and prior audit or inspection reports) for each POTW pretreatment program. For the purposes of the cost estimate, the contractor shall assume that generally two inspectors will be required to spend two days on-site for each audit. Audits of large facilities will be considered two-unit tasks, requiring double level of effort defined. The contractor shall schedule field work in a manner that efficiently uses travel resources. The contractor shall enter these activities into ICIS within 10 days of field activities.

1.A. Conduct Pretreatment Compliance Audits (PCAs): The contractor shall conduct PCAs at the facilities specified by the WACOR, in accordance with the EPA audit guidance manual entitled Pretreatment Compliance Inspection and Audit Manual for Approval Authorities (EPA 833/B-86-100, July 1986). Audits shall be scheduled based on input from the State and the WACOR.

1.B. Prepare PCA Reports: The contractor shall prepare written reports for each PCA conducted. The report format is specified in the Audit Manual listed above. Each audit shall include: 1. an assessment of the extent to which each POTW under the local pretreatment program is complying with federal pretreatment regulations, their approved pretreatment programs, and requirements specified in their permit(s); 2. an assessment of industrial users regulated by the POTW to determine compliance with pretreatment requirements; and 3. an assessment of the POTW's status regarding the items in Appendix A titled "Pretreatment Audit and Inspection Focus Topics."

Task B-3: Pretreatment Program Inspections

The contractor shall support EPA Region 9 in conducting on-site Pretreatment Compliance Inspections (PCIs) and submitting written reports on the findings, as listed below. For the purposes of the cost estimate, the contractor shall assume approximately 29 (~~23~~) Pretreatment Program Inspections will be conducted.

In preparation for each inspection, EPA Region 9 or the State will furnish the Contractor with all applicable background documents (e.g., permit and fact sheet, latest annual report, and prior audit or inspection reports) for each POTW pretreatment program. For the purposes of the cost estimate, the contractor shall assume that generally two inspectors will be required to spend one day on-site will be required for each inspection. Audit of large facilities will be considered two unit tasks, requiring double the level of effort defined here. The contractor shall schedule field work in a manner that efficiently uses travel resources. The contractor shall enter these activities

into ICIS within 10 days of field activities.

1.A. **Conduct Pretreatment Compliance Inspections (PCIs):** The contractor shall conduct PCIs at the facilities specified by the WACOR, in accordance with the EPA audit guidance manual entitled Pretreatment Compliance Inspection and Audit Manual for Approval Authorities (EPA 833/B-86-100, July 1986). Audits shall be scheduled based on input from the State and the WACOR.

1.B. **Prepare PCI Reports:** The contractor shall prepare written reports for each PCA conducted. The report format is specified in the Audit Manual listed above. Each audit shall include: 1. an assessment of the extent to which each POTW is complying with federal pretreatment regulations, their approved pretreatment programs, and requirements specified in their permit(s); 2. an assessment of industrial users regulated by the POTW to determine compliance with pretreatment requirements; and 3. an assessment of the POTW's status regarding the items in Appendix A titled "Pretreatment Audit and Inspection Focus Topics."

Task B-4: Pretreatment Evaluations of Individual Program Components

The contractor shall support EPA Region 9 by evaluating new or revised components of local pretreatment programs as listed below. Such components are:

- Ordinances;
- Local limits development studies;
- Enforcement response plans; or
- Multijurisdictional agreements

The need for these evaluations is created by many circumstances including new local program development, reissuance of a municipality's NPDES permit, or a pretreatment program's adoption of the National pretreatment streamlining regulation changes. In performing these evaluations, the contractor shall generally follow U.S. EPA's model ordinance, local limits guidance document, streamlining implementation guidance, and other applicable EPA guidance.
EPA Region 9 or the State will furnish the contractor with all applicable background documents. The ordinance reviews envisioned under this task are substantial efforts frequently associated with new program development or streamlining adoption. The evaluation of ordinance changes that are limited to changes to reflect new local limits is included as part of the evaluation of local limits development studies. EPA Region 9 expects that travel will not be necessary to perform work under this task.

Task B-5: Pretreatment Evaluations of Full Program Submittals

The contractor shall support EPA Region 9 by evaluating new or revised full pretreatment program submittals as listed below. Such evaluations will include all aspects of a pretreatment program. The need for these evaluations is created by many circumstances including new local program development, reissuance of a municipality's NPDES permit, or extensive pretreatment program modifications. In performing these evaluations, the contractor shall generally follow

U.S. EPA's model ordinance, local limits guidance document, streamlining implementation guidance, and other applicable EPA guidance. EPA Region 9 or the State will furnish the contractor with all applicable background documents. EPA Region 9 expects that travel will not be necessary to perform work under this task.

Task B-6: Pretreatment Training Sessions

The contractor shall support EPA Region 9 by providing pretreatment training to State personnel and/or local pretreatment operators. There shall be two (2) one-day trainings at a time and location determined by the State or Regional Water Board and communicated via technical direction from the WACOR. Specific pretreatment training details will be provided to the contractor in consultation with the State and Regional Water Boards via technical direction from the WACOR.

The contractor shall provide an electronic version of Course Materials, consisting of PDFs of each module of the pretreatment training class. The contractor shall provide assistance to EPA and California to develop associated materials, worksheets and sample problems.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task B as appropriate.

DELIVERABLES REQUIRED AND SCHEDULE – PRETREATMENT

Based on Regional Water Board requirements and applicable formats and/or language, the contractor shall conduct the pretreatment audits/inspections/program reviews and prepare inspection reports, including all materials and documents used in permit development) for each facility assigned. These draft documents shall be provided to appropriate EPA staff (the WACOR and the regional pretreatment coordinator) and State staff for review and comment, as arranged through the WACOR. Individual deliverable due dates shall be agreed with the relevant Regional Water Board, with concurrence by SWRCB and EPA.

Documents shall be submitted by E-mail to the relevant Regional Water Board pretreatment contact with a CC to the WACOR, in either .DOC or .PDF file formats and shall be accessible, functional and free from computer viruses or other technology problems.

The duplication of more than 5,000 copies of a single page or 25,000 or more total impressions is considered "printing" and, therefore, prohibited. For more information on restrictions relating to deliverables, the contractor is referred to the EPA Publication Management Guide (EPA-175-K-92-011).

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

SUMMARY OF DELIVERABLES AND DUE DATES			
Task/Subtask	Deliverable	Distribution	Due Dates*
Task 1.A.1	Kickoff Meeting Agenda	WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Within 2 weeks of award
Task 1.A.1	Kickoff Meeting Summary	WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Within 3 weeks of award, and no later than September 30 2017.
Task 1.B.1	Tracking Spreadsheet	WACOR, EPA pretreatment coordinator, SWRCB pretreatment liaison	Initial version within 2 weeks of first Technical Directive identifying permits for contractor support, then updated as new dates and information are received
Task 1.B.2	Monthly Progress Report	WACOR, EPA pretreatment coordinator SWRCB pretreatment liaison	By 10th day of each calendar month, for activities during the preceding calendar month.
Task 1.A.3	Monthly Update Call Follow-up	WACOR, SWRCB pretreatment liaison	Monthly after submission of Monthly Progress Reports, on a schedule to be agreed with the SWRCB.
Task 2	Pretreatment Compliance Audit (PCA) report	EPA pretreatment coordinator, WACOR, assigned Regional Water Board pretreatment liaison, SWRCB pretreatment liaison	All field activities and ICIS entries by May 31, 2018, all draft reports by June 15, 2018, all final reports within 15 days of receipt of comments and no later than June 30 2018. Specific schedules to be set by Technical Directive as individual
Task 3	Pretreatment Compliance Inspection (PCI) report		
Task 4	Pretreatment program component review		
Task 5	Full Pretreatment program review		

			dischargers are identified for audits.
Task 6	Pretreatment Training	EPA pretreatment coordinator, SWRCB pretreatment liaison	As scheduled with SWRCB, no later than June 30 2018.

*Note: All days are calendar days unless otherwise specified.

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task B and all sub-tasks therein is approximately 4168 hrs. For the purposes of the cost estimate, the contractor can assume nineteen (19) travel trips for all sub-tasks associated within Task B.

SCOPE OF WORK – Task C: Permit Writing

Task C-1: Permit Writing - Project Management

C-1-1 Project Administration: The contractor's responsibilities shall include regular coordination with the WACOR, the State Water Resources Control Board (SWRCB), and relevant Regional Water Boards to ensure preparation of permit drafts which are compliant with state and federal law, on a schedule which meets the needs of these Water Boards.

a. **Kick-off Meeting:** An initial kick-off meeting for the contractor to meet with the WACOR and SWRCB oversight team. The objective of the kickoff is to provide a review of scope of permit writing tasks for the year which may be assigned to the contractor. This meeting may take place in person or via video- or teleconference. The agenda and meeting notes shall be prepared by the contractor, and the agenda shall identify any information the contractor will need to receive from EPA or the SWRCB to begin work. The draft agenda shall be submitted to the WACOR at least three days prior to the meeting.
b. **Coordination and Planning:** The contractor shall be available for routine communication, planning and coordination with the WACOR on California NPDES permit writing needs. The contractor shall confirm in writing any significant decisions or agreements made during these interactions. These interactions will take place at least once a month (possibly as part of the Monthly Update Calls, see next), or as needed during normal business hours, via telephone, email, skype, video conferencing or in person.
c. **Monthly Update Calls:** The contractor shall participate in update calls, to be held on a frequency not less than monthly, with the WACOR and the SWRCB to detail progress on each active work project (permit), to identify and correct problems, and provide feedback on permitting issues in individual areas. These calls shall be structured as an item-by-item review of the Progress Report and associated Tracking Spreadsheet.

C-1-2 Tracking and Reporting: The contractor shall ensure EPA and the SWRCB remain fully informed about the contractor's activities, and approve of those activities, through the following measures:

d. **Tracking of progress on permit issuance:** The contractor is required to track each permit during the NPDES permit development process. The contractor shall maintain an up-to-date record of progress on all work assigned, including projected draft, review, correction and submission dates, in an electronic tabular format (hereafter referred to as the "Tracking Spreadsheet") based on the provided example. This information, particularly changes in target dates, will be shared with the WACOR during the monthly update calls and as part of the monthly progress reports, both described below. The contractor is required to submit the report electronically in a table format that includes each of the specific projected dates above, as well as timelines for completion of all final permit packages.

f. **Monthly Progress Reports:** The contractor shall prepare and submit a report on permit-writing progress during a given month, by the 10th day of the following month. This Progress Report shall be sent to the WACOR and the designated contact at the SWRCB, and shall take the form of an E-mail or similar communication enabling sharing of digital files. The Report shall contain a separate section on work in each Regional Water Board, and shall discuss in writing any changes in target dates, the grounds for those changes, and major issues encountered, with special emphasis on any issues affecting more than one Regional Board. Attached to the E-mail and integral to the Progress Report shall be a copy of the most recent version of the Tracking Spreadsheet. Projected dates which have changed since the previous Monthly Progress Report shall be highlighted in the spreadsheet.

g. **Itemized Invoicing:** Each monthly invoice to EPA shall include a list, itemized by Regional Water Board, of all permits worked on for each regional board in the preceding month and the status of that permit as of the date of the invoice.

h. **Submission Requirements:** Tracking Spreadsheets, Monthly Progress Reports, and other significant communications or submissions of deliverables shall be sent by E-mail to the WACOR with CCs to the SWRCB contact and relevant Regional Water Board permit contact. Documents shall be in either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

Task C-2: Permit Writing - Draft and Final Permit Packages and Administrative Records

The contractor shall prepare draft permit packages for each facility assigned. Specific permits will be identified by the EPA Work Assignment Contracting Officer's Representative (WACOR) on a regular basis, at minimum quarterly, and provided to the contractor in writing. Correspondence shall primarily be in electronic form. Each permit package shall be consistent

with applicable Federal and California regulations and guidance and also conform to California's style and formatting practices as directed in the permit templates supplied by the State Water Board, and local variations thereon supplied by the Regional Water Board(s).

The contractor may be asked to provide the following services:

- Review data that has been provided by EPA Region 9, the state, tribes, and/or the discharger as part of the permit application process;
- Identify, collect, and review any additional background data for each facility to be permitted and the affected receiving water needed to properly evaluate the need for permit limitations and conditions;
- Prepare a draft permit and supporting documentation for each facility assigned. These draft documents shall be provided to EPA Region 9, and other appropriate parties, for review and comment. Afterwards the contractor shall incorporate and address those comments and submit a permit package for the Regional Water Board to adopt and conduct public notice on. The final drafted products shall also be provided to EPA and the SWRCB at the same time they are sent to the relevant Regional Water Board.
- For certain permits in the higher-tier support groups, as identified by the Regional Water Boards, the contractor may be required to support development of materials for the formal board meeting at which the permit is presented, and/or responses to public comments on the contractor-drafted permit after it is put out for public notice.

Permit packages shall be categorized into one of the following groups, based on the contractor activities requested by the Regional Water Board as listed in Table 1 below:

***Task C-2-a**: Permit Writing* <u>*Group I*</u> (23) permits requested at this level of support

- Contractor activities 1, 2, 3, and 7, plus any <u>one</u> of the following contractor activities: 4, 5, 6, 8, or 9.

***Task C-2-b**: Permit Writing* <u>*Group II*</u> (6) permits requested at this level of support

- Contractor activities 1, 2, 3, and 7, plus any <u>two</u> of the following contractor activities: 4, 5, 6, 8, and/or 9.
- General permit renewals with fewer than 20 enrollees will be assigned this level of support.

***Task C-2-c**: Permit Writing* <u>*Group III*</u> <u>(3)</u> permits requested at this level of support)

- Contractor activities 1, 2, 3, and 7, plus any <u>three or more</u> of the following contractor activities: 4, 5, 6, 8, and/or 9.
- General permit renewals with 20 or more enrollees and new general permits will be assigned this level of support.

If a permit package cannot be precisely categorized into a group based on the above criteria, it shall be classified by the WACOR based on best professional judgment. For the purposes of the cost estimate, the contractor shall assume **23** Group I permits, **6** Group II permits, and **3** Group III permits will be assigned.

The following is the suggested process and timeframe for providing NPDES permit support to Regional Water Boards in California. The process may need to be adjusted based on the specific schedules and procedures established by the WACOR and the particular Regional Water Board. For each Regional Water Board, the contractor shall identify a single point of contact.

The documents shall be in either .DOC or .PDF file formats (for text) or .XLS format (for tracking spreadsheets) and shall be accessible, functional and free from computer viruses or other technology problems.

The CA SWRCB has developed a NPDES Quality Assurance Program Plan (QAPrP) that describes the NDPES program's quality system, roles and responsibilities of all participants and the requirements for producing and using data of known quality. This QAPrP will serve as guidance for the contractor in conducting all activities relating to task C-2 permit writing and development.

Table C. Contractor Activity Descriptions and Suggested Delivery Timeframes

No.	Activity Description	Suggested Timeframe
1	Review/Copy Files • The contractor shall assign staff to review and obtain copies of all permit file information necessary for permit development (e.g., applications, monitoring data, compliance and enforcement correspondence). Use of electronic documents where possible, to conserve resources, is encouraged. • The contractor shall coordinate with the WACOR and the Regional Water Board regarding when contractor staff are scheduled for on-site visits for data collection prior to contractor staff arriving at the Regional Water Board.	Within 2 weeks after permit assignment by WACOR
2	Collect Additional Data and Information (as necessary) • The contractor shall be authorized to contact the facility directly if additional data or information is required to initiate permit development. Any correspondence between the facility and the contractor shall be documented for the contract file and Regional Water Board administrative file as deemed necessary (e.g., new data submittal). Perform Pre-Permit Site Visit (as necessary) • As time allows, a permit site-visit <u>may</u> be performed to observe facility operations, outfall conditions, etc. • When feasible, a permit site visit shall be coordinated with planned compliance evaluation inspections (CEIs). • EPA and Regional Water Board facility contacts shall be notified of all permit site visits prior to the visit. At EPA and Regional Water Board discretion, their staff may accompany contractor staff.	Within 4 weeks after permit assignment
3	Complete Draft Reasonable Potential Analysis (RPA) and develop draft Water Quality-Based Effluent Limits (WQBELs)	

No.	Activity Description	Suggested Timeframe
	• Based on review of Report of Waste Discharge (ROWD) or applications, identify permitting policy issues (if any) for discussion with Regional Water Board. As necessary, discuss with Regional Water Board to reach resolution. • Based on data and information collected, a draft RPA and draft WQBELs (if necessary) shall be calculated, summarized, and provided to the Regional Water Board contact for review and comment. • As necessary, the contractor shall participate in meetings and phone calls with the Regional Water Board to discuss any site-specific situations where guidance is needed regarding the approach to be taken for preparing draft permits. • When transmitting the draft RPA and WQBELs to the Regional Water Board, any unique or potentially controversial issues shall be highlighted to facilitate review. • Subsequent to delivery of the draft RPA and WQBELs, the contractor shall schedule a conference call or meeting with EPA and the Regional Water Board to describe the approach taken, data issues (if any), and discuss any unique discharge situations. • The draft RPA and WQBEL documents shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to WACOR and liaison, and the appropriate Regional Water Board Manager and/or Senior.	
	Receive Regional Water Board Comments on Draft RPA and WQBELs	Within 1 week after receipt
4	Prepare Issue Paper • The Issue Paper shall highlight any unique issues or permit conditions in order to facilitate review by the RB. • The Issue Paper may be accompanied by a draft Fact Sheet and/or draft Monitoring and Reporting Program. • The format and guidance to be followed shall be the most recent version of the RB permit template and matrix.	
	Receive Regional Water Board Comments on Issue Paper	Within 2 weeks after receipt
5	Prepare and Deliver Administrative Draft Order/NPDES Permit Package • Based on comments from EPA and the Regional Water Board, revisions to the draft RPA and WQBELs shall be made as necessary. • Administrative Draft Order/NPDES Permit Package includes Cover Page, Limitations and Discharge Requirements, Attachments A through G of the permit template, and a draft cover letter to transmit the administrative draft to the facility.	Within 2 weeks following receipt of comments from EPA and the Regional Water Board on draft RPA and WQBELs

No.	Activity Description	Suggested Timeframe
	• As necessary, and prior to delivery of the draft, the contractor shall contact the Regional Water Board to discuss any site-specific situations where direction is needed regarding the approach to be taken in the Order/permit. • As necessary, a draft Time Schedule Order or Cease and Desist Order shall be prepared for those pollutants for which compliance schedules are not allowed in the Order (those based on Basin Plan water quality objectives). • In order to facilitate review by EPA and the Regional Water Board, any unique issues or permit conditions shall be highlighted in the Administrative Draft Order/NPDES Permit Package. • The Administrative Draft Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Senior (as applicable). • Subsequent to delivery of the Administrative Draft Order/NPDES Permit Package, the contractor shall schedule a conference call (as needed) or meeting with EPA and the Regional Water Board contact to walk through the approach taken for developing requirements and provisions, and discuss any other potentially controversial issues related to the draft order/permit package. [Note: if no comments are provided on the administrative draft Order/NPDES permit package, the draft shall be considered the final administrative draft Order/NPDES permit package.]	
	Receive Regional Water Board comments on Administrative Draft	Within 1 week after receipt
6	Incorporate Regional Water Board Comments on the Administrative Draft Order/NPDES Permit Package (as necessary), and Prepare and Deliver the Final Administrative Draft Order/NPDES Permit Package • Based on comments from EPA and the Regional Water Board, revisions to the administrative draft Order/NPDES permit package shall be made. • If necessary, a final administrative draft Order/NPDES permit package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to the appropriate Regional Water Board Manager and/or Senior.	Within 1 week after receipt of comments from EPA and Regional Water Board
7	Prepare and Deliver the Tentative Draft Order/NPDES Permit Package • Address any comments received by EPA and the Regional Water Board on the draft RPA and WQBELs or Final Administrative Draft Order/NPDES Permit Package.	Within 2 weeks after receipt of comments from EPA and the Regional Water Board

No.	Activity Description	Suggested Timeframe
	• Make any final changes/edit/etc., and prepare the Tentative Draft Order/NPDES Permit Package. • The Tentative Draft Order/NPDES Permit Package shall include all components of the administrative draft permit record, including application and supporting data, tentative draft Order/NPDES permit, documents or other items cited in tentative draft Order/NPDES permit, and any other items supporting permit development • Prepare public notice materials to transmit the Tentative Draft Order/NPDES Permit Package (transmittal letter for facility and interested parties, Notice of Public Hearing, letter to newspaper for public advertising, etc.). Formats for the public notice materials to be provided by the Regional Water Board. • The Tentative Draft Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Manager and/or Senior Engineer. • Subsequent to delivery of the Tentative Draft Order/NPDES permit package, the contractor shall schedule a conference call (as needed) or meeting with the Regional Water Board contact to discuss any significant changes or issues related to the tentative draft order/permit.	
8	Respond to Public Comments on the Tentative Draft Order/NPDES Permit Package and Prepare and Deliver the Final Tentative Draft Order/NPDES Permit Package • Assist Regional Water Board staff with Response to Comments for technical issues related to development of the permit package. • Revisions to the Tentative Draft Order/NPDES Permit Package shall be made to address the public comments received and any additional comments from EPA and the Regional Water Board contact. • A Final Tentative Order/NPDES Permit Package shall be delivered (via e-mail) to the Regional Water Board contact for the facility, with copies sent to EPA and the appropriate Regional Water Board Manager and/or Senior.	Within 2 weeks after receipt of comments from EPA and the Regional Water Board
9	Develop Board Agenda Materials • Based on formats to be provided by the Regional Water Board, the contractor shall prepare materials to be used by the Regional Water Board contact for use at the Board meeting.	To be delivered concurrently with the response to comments and Final Tentative Draft Order

Specific permitting tasks will be identified by the State and Regional Water Boards and assigned to the contractor by the WACOR in writing, on not less than a quarterly basis, as indicated above.

DELIVERABLES REQUIRED AND SCHEDULE – PERMIT WRITING

Based on Regional Water Board requirements and applicable formats and/or language, the contractor shall conduct the pretreatment audits/inspections/program reviews and prepare inspection reports, including all materials and documents used in permit development) for each facility assigned. These draft documents shall be provided to appropriate EPA staff (the WACOR and the regional pretreatment coordinator) and State staff for review and comment, as arranged through the WACOR. Individual deliverable due dates shall be agreed with the relevant Regional Water Board, with concurrence by SWRCB and EPA.

Documents shall be submitted by E-mail to the relevant Regional Water Board pretreatment contact with a CC to the WACOR, in either .DOC or .PDF file formats and shall be accessible, functional and free from computer viruses or other technology problems.

The duplication of more than 5,000 copies of a single page or 25,000 or more total impressions is considered "printing" and, therefore, prohibited. For more information on restrictions relating to deliverables, the contractor is referred to the EPA Publication Management Guide (EPA-175-K-92-011).

SUMMARY OF DELIVERABLES AND DUE DATES			
Task/Subtask	Deliverable	Distribution	Due Date*
Task C-1-1.a	Kickoff Meeting Agenda	WACOR, SWRCB permitting liaison	Within 2 weeks of award
Task C-1-1.b.	Kickoff Meeting Summary	WACOR, SWRCB permitting liaison	Within 3 weeks of award, and no later than September 30 2017.
Task C-1-1.c	Tracking Spreadsheet	WACOR, SWRCB permitting liaison	Initial version within 2 weeks of first Technical Directive identifying permits for contractor support, then updated as new dates and information are received
Task C-1-1.c	Monthly Progress Report	WACOR, SWRCB permitting liaison	By 10th day of each calendar month, for activities during the preceding calendar month.
Task C-1-1.c	Monthly Update Call	WACOR,	Monthly after

	Follow-up	SWRCB permitting liaison	submission of Monthly Progress Reports, on a schedule to be agreed with the SWRCB.
Task C-2 (subtasks C-2-a, C-2-b, and C-2-c)	Draft NPDES Permit(s) as individually requested by State & Regional Water Boards	WACOR, assigned Regional Water Board permitting liaison, SWRCB permitting liaison	Schedule for individual permit drafts shall be as assigned in the relevant Technical Directive(s) after contractor reaches agreement with the issuing Regional Water Board.

*Note: All days are calendar days unless otherwise specified.

The Contractor shall notify the CO and WACOR in writing when 75% of the authorized work assignment LOE/labor hours have been expended.

Total estimated level of effort for Task C and all sub-tasks therein is approximately 6689 hrs. The contractor can assume two (2) travel trips for all sub-tasks associated within Task C.

SCOPE OF WORK – AMENDMENT 1 = Task D: More Permit Writing

This AMENDMENT 1 requests more permit writing support; i.e., similar content to Task C. The type of NPDES permit support is to be determined and may include traditional NPDES permit(s) and/or may be municipal separate storm sewage system (MS4) permit(s) or portions thereof. Total estimated level of effort for Task D AMENDMENT1 and all sub-tasks therein is approximately 519 hrs. The contractor can assume ONE (1) travel trip for all sub-tasks associated within Task D.

This AMENDMENT1 contains the same components as in Task C, including Project Management (C-1) as well as Draft and Final Permit Packages and Administrative Records (C-2). Minimal effort is anticipated for Project Management (C-1) since the LOE is small; i.e., one or two permits or portions thereof. The specific permit(s) will be identified by WACOR (in communication with State Water Board contractor representative). If a permit package cannot be precisely categorized into a group based on the criteria presented in Task C-2, it shall be classified or defined by the WACOR based on best professional judgment.

AMENDMENT 1 DELIVERABLES REQUIRED AND SCHEDULE –MORE PERMIT WRITING

This AMENDMENT 1 requests same deliverables and due dates as presented in Task C, except the kickoff meeting summary is due no later than October 15, 2017.

SCOPE OF WORK - AMENDMENT 2

This Amendment 2 contains modifications to existing tasks (Task B and C and D) as well as adding two new tasks (Task E and F). Briefly, this amendment removes some deliverables in Task C (i.e., 14 less permits to be delivered) and translates the equivalent contractor level of effort to accomplish all modifications and new tasks described below. Approximately 2545 hours of less permits in Task C are to be converted to total equivalent level of effort for completing modifications, new tasks and all deliverables described below. No change to Task A is included in Amendment 2.

Task B: Pretreatment Inspections
Amendment 2 increases the total number of PCAs from 9 to 11 and the total number of PCIs from 23 to 27, which will require an additional 4 trips for a total of 19 trips.
Total estimated level of effort for Task B AMENDMENT2 and all sub-tasks therein is increase of approximately 665 hrs. This Amendment 2 does not modify the deliverables for Pretreatment training (Task B-6).

NOTE: edits have been made to Due Dates for Pretreatment Deliverables (see pages 13 &14 above) since some dates were outside the period of performance for this WA 1-67.

Task C: Permit writing
Amendment 2 reduces total number of permits delivered to be 32 permits.
For the purposes of the cost estimate, the contractor shall assume **23** Group I permits, **6** Group II permits, and **3** Group III permits will be assigned. Based on Amendment 2, the total estimated level of effort for Task C and all sub-tasks therein is reduced to approximately 6689 hrs.

Task D: More Permit Writing
New task added to Task D above.
Contractor shall provide technical support to Los Angeles Regional Water Board with reissuing MS4 permits. Technical support to evaluate traditional programmatic elements of MS4 permits that are often imposed to meet the maximum extent practicable (MEP) standard, relative to federal regulations, EPA-issued MS4 permits, and EPA guidance to buttress the rationale for the necessity of these provisions to meet federal requirements. Contractor support is essential and appropriate because the contractor possesses a vast knowledge of EPA-issued MS4 permits across the nation and has broad experience in evaluating a variety of MS4 Permittees' programs relative to federal requirements. Deliverables and contents therein will be transferable to other Regional Water Boards as they prepare to reissue their MS4 permits in future. The contractor shall develop written technical memo (e.g., either permit and/or factsheet language) to address the following sub-tasks:

- Evaluate the minimum control measure provisions in the Los Angeles County and Ventura County MS4 permits relative to federal requirements;
- Propose streamlined provisions consistent with federal requirements, which also support Permittees' flexibility to tailor their programs to address water quality priorities;
- Develop fact sheet language to support the streamlined provisions described immediately above. Fact sheet language would address (1) the federal requirement for the language, (2) whether the provision is a new or higher level of service, and (3) whether Permittees have the ability to levy fees to implement the requirement.

Contractor shall incorporate edits, modifications and recommendations on the draft memo provided by WACOR, State Board staff and Los Angeles Water Board staff into the final technical memo.

The Performance Surveillance Plan presented at end of this document shall apply, specifically Task C-2 performance requirements, standards and acceptable quality levels shall also apply for Task D (Amendment 2).

Task D (Amendment 2) deliverables and due dates:

Task	Deliverable	Distribution	Due Dates
D.1	Kickoff Meeting	WACOR, EPA technical representative, State Board technical representative(s), Los Angeles Board technical representative(s)	Within 2 weeks of award
D.2	Kickoff Meeting Summary		Within 3 weeks of award and no later than Feb. 28, 2018.
D.3	Draft technical memo	WACOR, EPA technical representative, State Board technical representative(s), Los Angeles Board technical representatives	As scheduled with EPA and State Board staff (draft memo shall be no later than June 1, 2018)
D.4	Final technical memo	WACOR, EPA technical representative, State Board technical representative(s), Los Angeles Board technical representatives	As scheduled with EPA and State Board staff (final memo shall be no later than June 30, 2018)

Total estimated level of effort for AMENDMENT2 Task D and all sub-tasks therein is approximately 501 hrs.

Task E: Inspection training

Contractor shall develop and deliver NPDES Inspector training for State Water Board and Regional Water Board staff to further expand the Water Boards' NPDES program capacity for consistent and efficient inspection-related workload. The contractor shall work with EPA and Water Boards' staff to scope and plan this training to build NPDES staff knowledge and skills in using a digitized and standardized Compliance Inspection form. This amendment includes but is not limited to: identifying strengths and weaknesses of state-inspection reports and inspection procedures to help target needed training, creating digitized version of existing standardized inspection forms for standard use by State inspection staff. Contractor shall consider use of trainings via webinars to State staff and providing such webinar recordings for future use by California NPDES program and future staff trainings.

Task E deliverables and due dates:

Task	Deliverable	Distribution	Due Dates
E.1	Kickoff Meeting	WACOR, EPA technical representative, State Board technical representative(s)	Within 2 weeks of award
E.2	Kickoff Meeting Summary		Within 3 weeks of award and no later than Feb. 28, 2018.
E.3	Draft presentation of Inspection Training	WACOR, EPA technical representative, State Board technical representative(s)	As scheduled with EPA and State Board staff (draft PPT shall be no later than June 1, 2018)
E.4	Inspection Training (up to 2 separate training dates)	WACOR, EPA staff and Water Board staff	As scheduled with EPA and State Board staff (each training date shall be no later than June 30, 2018)

Total estimated level of effort for Task E and all sub-tasks therein is approximately 368 hrs.

The Performance Surveillance Plan presented at end of this document shall apply, specifically Task B-6 performance requirements, standards and acceptable quality levels shall also apply for Task E.

Task F: Municipal Stormwater Workshop support

This modification requests contractor assistance to provide supplemental support to an EPA and San Francisco Regional Water Board co-sponsored workshop on municipal stormwater permit monitoring. This additional support is directed toward providing honoraria to topic experts to attend, participate and deliver presentations at the workshop planned for March 2018. Contractor may need to utilize some funding for administrative and management purposes of the honoraria. Ultimately, the workshop outcomes will assist the California State Board "Strategy to Optimize Resource Management of Stormwater" (STORMS) program, build more local stormwater program capacity as well as assist EPA, California Stormwater Quality Association (CASQA) and improve stormwater permit monitoring/evaluating/reporting approaches and make more efficient uses of available resources. Support for this amendment is supplemental to another EPA OWM Work Assignment (1-72) under the same contract (EP-C-16-003) but does not replicate or duplicate any contractor work or deliverables in that Work Assignment (EP-C-16-003/WA1-72).

Contractor will utilize technical expertise criteria to select expert panelists to participate and provide technical information (via PowerPoint presentation) at the EPA-sponsored workshop. The expert panelists' presentations are critical to success of the workshop since they will provide 'conversation starters' for participants to discuss further and eventually yield lessons learned and recommendations for improving stormwater permitting. Contractor shall discuss with EPA's COR and Technical Representative to establish the technical expertise criteria. Concepts that may be considered as selection criteria include but are not limited to the following:

- extensive expertise and experience in municipal separate storm sewer system (MS4) permitting and program development;
- geographical representation from other parts of the country outside CA;
- understanding of how MS4 programs have evolved over time and of the future challenges facing MS4 permitting and program development;
- Goal is for balanced mix of federal, state, and local participants including representation from expert consultants and citizen groups;

Contractor may provide honorarium payments to as many as 7 expert panelists. Contractor shall make final decisions on which expert panelists receive honorarium payments. Honorarium payments shall not be provided to any federal representatives.

Task F: Deliverables and Due Dates:

Kickoff call to discuss selection criteria shall occur no later than March 1, 2018.
Draft presentations by expert panelists shall be provided to WACOR and EPA technical representative within 1 week in advance of workshop.
Final presentations given by expert panelists shall be provided to WACOR and EPA technical representative within 1 month after workshop.
Contractor shall provide confirmation of honoraria payments to WACOR within one month after workshop.

Total estimated level of effort for Task F and all sub-tasks therein is approximately 23 hrs.

Task F shall adhere to all Performance Standards and Acceptable Quality Levels identified below.

<u>Performance Standards</u>

- Contractor shall ensure expert panelist attend, participate and give a presentation at EPA-sponsored workshop in spring 2018,
- Contractor shall submit each expert panelist's draft presentations to EPA in MS PowerPoint within 1 week in advance of workshop.
- Presentation must be clear, readable and logically structured to provide concise information to workshop audience of expert panelist's experiences and recommendations for improving municipal stormwater permit monitoring, tracking or reporting.

CONTRACT PWS REFERENCE

See Contract SOW Page 1-10 of 14 ***Task # "Task Title", Page # - # of # Task # Task Name***

ANTICIPATED TRAVEL REQUIREMENTS

All travel shall be approved in advance by the Contract-Level Contracting Officer's Representative (CL-COR) and shall be in accordance with the Contract.

ADDITIONAL REQUIREMENTS

Office direct costs (ODCs) for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this delivery order without the prior written approval of the Contracting Officer.

Upon issuance of written technical direction, the Contractor shall submit for inspection of all work in progress at any time under this work assignment. The Contractor shall develop and maintain files supporting each task.

The contractor shall contact the Contracting Officer (CO) and/or the CL-CCOR by telephone to discuss any problems that may adversely affect the work on this Work Assignment. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO and the PO.

CONTRACTOR IDENTIFICATION

To avoid any perception that contractor personnel are EPA employees, the contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites.

CONTROL REQUIREMENTS

Quality Assurance Project Plan (QAPP):

Publishing on the NPDES website does not require a QAPP, since the people who generate the data are responsible for the data's quality, and it is their responsibility to develop a QAPP, if one is needed for their primary data uses. The contractor shall provide source references for data that is published on the website.

Organizational Conflict of Interest:

The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in FAR Subpart 9.5, or that the contractor has disclosed all such relevant information. See contract clause 1552.209-71 Organization of Conflict of Interest.

Notification of Conflicts of Interest Regarding Personnel:

The Contractor shall immediately notify the CL-COR and the Contracting Officer of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract, or (2) any such conflicts concerning subcontractor employees or consultants working on or having access to information regarding the contract, when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work. See Section H.4, contract clause EPAAR 1552.209-73 Notification of Conflict of Interest.

The contractor shall contact the WACOR and/or the Alternate Work Assignment Contracting Officer's Representative (Alternate WACOR) by telephone to discuss any problems that may adversely affect the work described in the PWS. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be provided via email to the WACOR with a copy to the Alternate WACOR and Contracting Officer.

Enforcement Sensitive Information:

The contractor recognizes that contractor employees in performing tasks specified in the PWS may have access to data/information, either provided by the government or first generated during contract performance, of enforcement sensitive nature which should not be released to the public without Environmental Protection Agency (EPA) approval. Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel, including but not limited to, subcontractor and consultant personnel assigned to work on this contract and/or task order, or with access to materials developed pursuant to such efforts, understand that this information is confidential and any disclosure or misuse of the information may result in prosecution to the fullest extent of the law. All contractor personnel are expected to exercise due diligence in safeguarding, handling or disposing of any such information.

Project Employee Confidentiality Agreement

The contractor agrees that the contractor employee will not disclose, either in whole or in part, to any entity external to the EPA, the Department of Justice, or the contractor, any information or data (as defined in FAR Section 27.401) provided by the government or first generated by the contractor under the work described in the PWS, any site-specific cost information, or any enforcement strategy without first obtaining the written permission of the EPA Work Assignment Contracting Officer's Representative (WACOR). If a contractor, through an employee or otherwise, is subpoenaed to testify or produce documents, which could result in such disclosure, the contractor must provide immediate advance notification to the EPA so that the EPA can take action to prevent such disclosure. Such agreements shall be effective for the life and for a period of five (5) years after completion of all work described in the PWS.

Handling of Confidential Business Information (CBI)

Contractor's access to TSCA CBI must comply with the procedures set forth in the TSCA CBI Security Manual. Likewise, access to FIFRA CBI shall follow the security procedures set forth in the FIFRA Information Security Manual.

To the extent that the work described in the PWS requires access to proprietary or confidential business or financial data of other companies, and as long as such data remains proprietary or confidential, the contractor shall protect such data from unauthorized use and disclosure.

All files or other information identified as Confidential Business Information (CBI) shall be treated as confidential and kept in a secure area with access limited to only contractor personnel directly involved in the case or special project assignment. The contractor, subcontractor, and consultant personnel are bound by the requirements and sanctions contained in their contracts with the EPA and in EPA's confidentiality regulations found at 40 CFR Part 2, Subpart B. The contractor subcontractors, and consultant must adhere to EPA-approved security plans which describes procedures to protect CBI, and are required to sign non-disclosure agreements before gaining access to CBI.

All official data, findings, and results of investigations and studies completed by the contractor shall be available for EPA and DOJ internal use only. The contractor shall not release any part of such data without the written direction of the WACOR.

Conferences and Workshops:

The tasks under this work assignment may require the acquisition of "off-site" facilities for conference(s) and meetings as defined in the IPN 12-05. AND the events associated with this work assignment are covered by EPA Order 1900.3 and do require EPA Form 5170.

The contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated $20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

Any event which meets the definition of a "conference," with total net expenditures greater than $20,000, is required to submit EPA Electronic Form 5170 and Form 5170-A (with cost estimates/actuals). In the case the workflow system is down and WACORs require emergency approval, they can submit EPA Form 5170 (PDF) (2pp, 93K) (with cost estimates) to conference@epa.gov.

PERFORMANCE SURVEILLANCE PLAN

Data entry and data management shall be conducted in accordance with the procedures outlined in the 1992 Permit Compliance System (PCS) Quality Assurance Guidance Manual, and follow the 2015 Final NPDES electronic reporting rule and Appendix A of the 40 CFR 127 electronic rule. The contractor shall also follow EPA and ICIS information security guidance described in the *ICIS Rules of Behavior.*

https://www.epa.gov/compliance/permit-compliance-system-pcs-quality-assurance-guidance-manual

https://www.epa.gov/compliance/final-national-pollutant-discharge-elimination-system-npdes-electronic-reporting-rule

Task A-1

Requirement	Standard	Acceptable Quality Level
The contractor shall collect all updated permit information, including adoptions, reissuances, recessions, amendments, and modifications of permits, enforcement actions, Time Schedule Orders, and Compliance Schedule Orders.	Data is received from nine California regional boards. The contractor shall review all data and research any discrepancies.	The contractor shall thoroughly review the permit document within 7 days of receipt. All updates and corrections are to be made in ICIS-NPDES.
The contractor shall enter and update permit limits as they are adopted, reissued, rescinded, modified, or amended.	The contractor shall follow the permit coding as it is written in the permit. Clarification to any coding issues shall be researched.	Within 30 days, the contractor shall have reviewed and updated all required permit coding in ICIS-NPDES. The contractor shall ensure all data

Requirement	Standard	Acceptable Quality Level
	For unclear information, the contractor shall seek solutions and/or contact the permit writer.	is clear, correct and complete.
The contractor shall provide monthly summaries of coded permits pending issuance in ICIS-NPDES.	Permit status information is stored in ICIS-NPDES. The contractor shall review all information and correct or highlight any inconsistencies.	The summary report shall indicate pending permits, becoming effective in upcoming months and shall be provided to WACOR.
The contractor shall review the Quarterly Noncompliance Report (QNCR) and provide corrections on any Significant Non-compliance data.	The contractor shall assist the SWRCB in updating ICIS-NPDES as needed to resolve violations identified in the NNCR.	The final report shall indicate all changes and corrections made to the data to be acceptable by EPA.
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry will follow guidance provided within SWRCB QAPrP.

Task A-2

Requirement	Standard	Acceptable Quality Level
The contractor shall maintain the NPDES Permit Status Tracking List (NPST) by entering updated information for all planned permits.	The contractor shall receive and review NPDES permit application, public notice, public comment period, permit issuance, permit effective, and permit expiration dates for all permittees.	NPST shall include 100% of data to provide the contractor with updated reports on permit status including reissuance dates, and all effective and expiration dates. This shall help assess workload for future fiscal years.
The contractor shall maintain the Status Tracking to stay on top of all permit activities.	Contractor shall update tracking system as new activities are documented. Contractor shall provide report on tracking system as requested by the WACOR.	All Permit Status Tracking Reports submitted to the WACOR shall be in an excel spreadsheet to include the most current information for each individual permit.

Task A-3

Requirement	Standard	Acceptable Quality Level
The contractor shall provide training in permit coding as	Contractor shall provide guidance document and	The training shall ensure all permit coding is clear and

Requirement	Standard	Acceptable Quality Level
requested by the State Water board.	sample permit coding from simplistic to complex coding.	understandable by State and Regional board staff. Should there be any questionable coding issues, the contractor will be available to assist and answer questions.
Contractor shall coordinate with EPA and SWRCB to prepare a schedule with interim milestones to complete this task. This includes coordination with EPA and SWRCB to schedule the training course dates.	Schedule shall be comprehensive and well organized to accommodate milestones and time needed to complete task and sub-tasks. Schedule shall indicate training course will occur 2nd or 3rd quarter of federal FY18.	The schedule is clear and concise and accurately reflects the work to be completed. The contractor shall alert EPA and SWRCB of significant schedule changes within 5 business days. Should there be any questionable coding issues, the contractor will be available to assist and answer questions.
Contractor shall develop, review and finalize training course agenda and materials for State permit staff. Draft materials shall be reviewed by EPA and SWRCB for approval prior to training course. If other training material is available to support the training, it should be made available to SWRCB.	-Training materials shall be comprehensive regarding specific permit content to be included in ICIS database. -Information contained within the training materials shall be of sufficient detail and quality to ensure State staff are prepared review permits and accurately code/enter required info into ICIS database. -The course agenda and materials shall be complete and concise, including step-by-step process on how permit coding is done, demonstrate examples and clear comprehension of basic to complex permit coding. -The contractor shall respond to comments from EPA and SWRCB and make any revisions as needed or directed by EPA.	Training agenda and materials are submitted in accordance with the schedule developed for this task. Training materials are presented in clear, concise and accurate with no more than 5 minor errors in content, spelling and grammar. The training shall ensure all permit coding is clear and understandable by State staff. The contractor shall respond to comments from EPA and SWRCB and make any revisions within 5 business days as needed. EPA and SWRCB will review agenda and materials, provide feedback and return to contractor with comments at least 2 weeks prior to training course.
Contractor shall deliver training to EPA and State	-Contractor shall provide final training course agenda and	Training course ensure all permit coding is clear and

Requirement	Standard	Acceptable Quality Level
staff to implement NPDES permit coding requirements. Assume 3-4 day training workshop in California.	materials to EPA and SWRCB so these materials can be provided by either EPA or SWRCB to State staff in advance of training course dates. -The contractor shall conduct the training course in a clear, concise, and accurate manner, answering questions during the training course. -The contractor shall highlight information and/or ideas from the training materials that pertain to coding NPDES permits. -The contractor shall augment course with permit examples and practice sessions into ICIS. -The contractor shall conduct a brief course evaluation at the end of the training course.	understandable by SWRCB and RWQCB staff. Contractor provides at least one instructor to teach the training to State staff. At least 75% of participants who submit course evaluations report that the training meaningfully increased their understanding of NPDES permit coding into ICIS database.
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry and coding training.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry and permit coding training will follow and/or include guidance provided within SWRCB QAPrP.

Task B-1

PERFORMANCE REQUIREMENT	**PERFORMANCE STANDARD**	**ACCEPTABLE QUALITY LEVEL (AQL)**
B.1 Kick-off Meeting: The Contractor shall conduct a kick-off meeting and prepare the agenda and meeting summary.	○ Kick-off meeting shall be coordinated with all parties in a timely manner. ○ Agenda topics shall include all pertinent issues for discussion. ○ Agenda topics shall be fully addressed during the meeting. ○ Open issues shall be addressed within 5 days of meeting. ○ Meeting summary shall be	▪ The kick-off meeting is held within 3 weeks of award, and no later than September 30 2016. ▪ The draft agenda is submitted to the WACOR at least 3 days prior to the meeting. ▪ 90% of all agenda topics are fully addressed during the meeting.

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	submitted to the WACOR within 5 days of the meeting. ○ Meeting summary shall appropriately cover topics of discussion including key details and agreements.	▪ 95% of the agenda and meeting summary shall be accurate, thorough, clear, concise, and free of spelling and grammar errors.
B.2 Coordination and Planning: The contractor shall be available for discussions with the WACOR about pretreatment inspection progress and related topics.	○ The contractor shall maintain regular communications with the WACOR, the SWRCB liaison, and the Regional Water Boards' pretreatment liaisons. ○ The contractor shall notify the WACOR in a timely manner of any issues, concerns or potential schedule changes. ○ The contractor shall be responsive to WACOR inquiries. ○ Conversations with the WACOR about progress on pretreatment inspections shall be held not less than monthly (e.g. as part of monthly update calls, below), or as requested by the WACOR. ○ The contractor shall confirm in writing any significant decisions or agreements. E-mail is an acceptable medium for written confirmations.	▪ The contractor shall contact the WACOR, via telephone or email, at least once each month. ▪ The contractor shall notify the WACOR of any significant issues, concerns or potential schedule impacts within 3 days of identification. ▪ The contractor shall respond to WACOR inquiries or requests within 3 days. ▪ The contractor shall submit documentation of significant decisions or agreements to the WACOR within 3 days of interaction. ▪ 90% of the documentation shall be thorough, accurate, clear, concise and free of spelling or grammar errors.
B.3 Monthly Update Calls: The contractor shall participate in monthly update calls with EPA and the SWRCB.	○ Calls shall be held not less than monthly on a schedule agreed to between the WACOR, SWRCB representative, and the Contractor. ○ Calls shall address the status of every active (assigned but not yet completed) pretreatment inspection being worked on as listed in the Monthly Progress Report.	▪ Call schedules are confirmed by the contractor not less than 1 week in advance. ▪ No monthly update calls are missed except by prior agreement with the WACOR, and calls which are rescheduled take place within 2 weeks of the original date. ▪ 90% of calls shall successfully address all ongoing work listed in the respective Monthly

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	○ Contractor shall update the WACOR and SWRCB representative on any open issues, concerns or schedule changes; and shall be responsive to EPA and SWRCB inquiries.	Progress Report. ▪ Issues which cannot be resolved on the call itself are responded to within 5 business days 90% of the time.
B.4 Maintenance of Inspector Credentials: Contractor personnel assigned to perform pretreatment inspections shall maintain valid inspector credentials	○ All contractor personnel assigned to perform pretreatment inspections shall maintain valid inspector credentials for the duration of the period of performance.	▪ Inspector credentials for each contractor inspector shall be reviewed and confirmed during the Monthly Update Call immediately prior to the scheduled pretreatment inspection.
B.1 Tracking of Progress on Pretreatment Inspection work ("Tracking Spreadsheet"): The contractor shall maintain an accurate record of assigned work and projected interim and final dates.	○ The contractor shall prepare a tracking spreadsheet showing projected dates for the draft, review, correction and submission to Regional Water Boards of each assigned pretreatment inspection (PCI, PCA, program evaluation) and/or pretreatment training session. ○ The contractor shall ensure this spreadsheet remains up to date during performance of the TO. ○ The spreadsheet shall be in .XLS or .XLSX format and based on the template provided	▪ Initial Tracking Spreadsheet shall be crafted within 2 weeks of receiving the first Technical Directive assigning specific pretreatment inspection targets and shall be no less than 95% accurate. ▪ Updates to the Tracking Spreadsheet shall be made within 3 days of new Technical Directives or schedule changes made by the Regional Water Boards, at which point updated copies shall be sent to the WACOR and SWRCB. ▪ Spreadsheet meets the format specified.
B.2 Monthly Progress Reports: The contractor shall prepare and submit a report on pretreatment inspection progress during each month.	○ Inspection status shall be reflected in, and consistent between, the monthly invoices and the monthly progress reports. ○ The monthly progress report document shall concisely and accurately detail current status on each pretreatment	▪ There shall be no discrepancies between monthly progress reports and submitted invoices in 95% of cases. ▪ 95% of monthly progress reports shall contain all the required information for assigned pretreatment

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	inspection, including progress, projected dates, major issues encountered, and upcoming milestones. o A report shall be submitted by the 10th day of each calendar month, covering activities during the previous calendar month. o The Monthly Progress Report shall distinguish between the Regional Water Boards when reporting work which has been conducted. o The progress report shall include an up-to-date version of the Tracking Spreadsheet, with highlighting for any changes made in the previous month to scheduled dates.	inspections whose status has changed. ▪ 95% of monthly progress reports are delivered by the 10th-day-of-next-month deadline. ▪ Progress Reports are organized to distinguish between work performed for each regional board ▪ Progress reports highlight major issues with each pretreatment inspection (if any), particularly issues which affect multiple pretreatment programs or multiple regional water boards. ▪ 95% of included Tracking Spreadsheets have correct highlighting of all changed dates, with notes on the cause of each change.
B.3 Itemized Invoices: Monthly invoices shall identify and distinguish work completed for each Regional Water Board separately.	o Monthly invoices shall include a list, by Regional Water Board, of all pretreatment inspections worked on in the preceding month and their status as of the date of the invoice.	▪ 100% of invoices are properly itemized in this fashion. 95% of invoices are found to be accurate when compared to which deliverables have been received by the WACOR.
B.4 Submission Requirements: The WACOR and SWRCB shall be copied on all significant submissions of documents, including submission of draft and final pretreatment inspection documents (deliverables) to the Regional Water boards.	o The WACOR and SWRCB representative shall receive copies of all draft and final pretreatment inspection documents prepared by the contractor at the same time as these deliverables are sent to the relevant Regional Water Board. o Documents shall be in either .DOC, .DOCX, or .PDF file formats (for text) or .XLS or .XLSX format (for spreadsheets) o Documents shall be accessible,	▪ 95% of submissions are appropriately copied to the WACOR and SWRCB representative upon submission, and all other submissions reach the WACOR and SWRCB representative within 3 days of being identified. ▪ 100% of submitted documents conform to the formats listed ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	functional and free from computer viruses or other technology problems.	virus-protection software, and checked for functionality (no corrupted files, etc.).
QA/QC Plan	If needed develop QA/QC plan for relevant pretreatment inspection reports. Need will be determined as part of kick-off meeting, or as additional pretreatment inspections are assigned.	If needed QA/QC plan must meet standards of EPA QC Section *(EPA QA/R-5).* QA performance shall be in conformance with the *Office of Water Quality Management Plan of 2001.*

Task B-2

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 2.A: Conduct Pretreatment Compliance Audits (PCAs).	Audits shall include assessment of compliance by POTW, assessment of compliance by industrial users discharging to the POTW, and assessment of POTW's status regarding the Pretreatment Audit and Inspection Focus Topics. Audit results shall be entered into ICIS within 10 days of conclusion of field activities / site visit.	Audits cover all required components and follow the procedures outlined in the EPA audit guidance manual (EPA 833/B-86-100, July 1986). ICIS entries are consistently prepared in a timely fashion.
Task 2.B: Prepare Audit Reports and submit to EPA and the State.	Audit reports shall comply with the format specified in the EPA guidance https://www3.epa.gov/npdes/pubs/final_pca_checklist_and_instructions_%20feb2010.pdf and shall be submitted on the schedule agreed to, and documented in, the latest approved tracking spreadsheet.	Not less than 95% of the time, audit reports shall contain all required elements, are technically accurate and professionally written and proofread, and are delivered on the agreed schedule.

Task B-3

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 3.A: Conduct Pretreatment	PCIs shall include assessment of compliance by POTW, assessment of compliance by	PCIs include all required components and follow the procedures outlined in the EPA

Compliance Inspections (PCIs).	industrial users discharging to the POTW, and assessment of POTW's status regarding the Pretreatment Audit and Inspection Focus Topics. Inspection results shall be entered into ICIS within 10 days of conclusion of field activities / site visit.	audit guidance manual (EPA 833/B-86-100, July 1986). ICIS Entries: 95% of Inspection results are entered into ICIS in accordance with the timeliness requirements in the Performance Standard. 98% of the data entered into ICIS is complete and accurate as of the time it is entered.
Task 3.B: Prepare PCI Inspection Reports and submit to EPA and the State.	Inspection reports shall include all inspection results for each required component assessed during the PCIs. Inspection reports shall comply with the format specified in Chapter 9 of the EPA Compliance Inspection manual https://www.epa.gov/sites/production/files/2013-09/documents/npdesinspect_0.pdf and shall be submitted on the schedule agreed to, and documented in, the latest approved tracking spreadsheet.	Not less than 95% of the time, PCIs reports shall contain all required elements, are technically accurate and professionally written and proofread, and are delivered on the agreed schedule.

Task B-4

PERFORMANCE REQUIREMENT	**PERFORMANCE STANDARD**	**ACCEPTABLE QUALITY LEVEL (AQL)**
Task 4: **Conduct evaluations of components of new pretreatment programs** and prepare evaluation reports for EPA and State review.	Evaluations shall focus on the assigned component(s) and adequately summarize and document the suitability of those pretreatment program components for regulatory compliance in accordance with the following EPA guidance documents: Guidance Manual for POTW pretreatment program development https://www3.epa.gov/npdes/pubs/owm0003.pdf Pretreatment Program legal authority review checklist	Evaluations are found adequate and useful for EPA and State pretreatment oversight on an individual basis. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the direction of EPA. ▪ 100% of submitted documents conform to the listed guidance documents. ▪ Before submission, all documents are scanned for viruses, harmful macros, and

	https://www3.epa.gov/npdes/pubs/pretreatment_legal_checklist.pdf Local Limits Development guide: https://www3.epa.gov/npdes/pubs/pretreatment_local_limits.pdf Enforcement Response Guidance: https://www3.epa.gov/npdes/pubs/owm0015.pdf	similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).

Task B-5

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 5: Conduct evaluation(s) of new pretreatment programs and prepare evaluation reports for EPA and State review.	Evaluations shall contain a thorough overview of the assigned pretreatment program(s) and adequately summarize and document the suitability of those pretreatment program components for regulatory compliance in accordance with the following EPA guidance documents: Guidance Manual for POTW pretreatment program development https://www3.epa.gov/npdes/pubs/owm0003.pdf Pretreatment Program legal authority review checklist https://www3.epa.gov/npdes/pubs/pretreatment_legal_checklist.pdf Local Limits Development guide: https://www3.epa.gov/npdes/pubs/pretreatment_local_limits.pdf Enforcement Response Guidance: https://www3.epa.gov/npdes/pubs/owm0015.pdf	Evaluations are found adequate and useful for EPA and State pretreatment oversight on an individual basis. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the direction of EPA. ▪ 100% of submitted documents conform to the listed guidance documents. ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).

Task B-6

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 6: Conduct pretreatment training for state staff.	-Course materials shall be delivered on the schedule agreed with EPA and the SWRCB. -Content of course materials shall be approved in advance by EPA. -Course evaluations shall be	Course Materials are delivered on the agreed schedule and address the topics requested by EPA and SWRCB. Evaluations are returned from at least 50% of class participants, and

	solicited from all attendees and return at least 80% favorable response rate.	at least 80% of those participants report the class to have improved their understanding of pretreatment implementation.

Task C-1

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
1.A.1 Kick-off Meeting: The contractor shall conduct a kick-off meeting and prepare the agenda and meeting summary.	○ Kick-off meeting shall be coordinated with all parties in a timely manner. ○ Agenda topics shall include all pertinent issues for discussion. ○ Agenda topics shall be fully addressed during the meeting. ○ Open issues shall be addressed within 5 days of meeting. ○ Meeting summary shall be submitted to the WACOR within 5 days of the meeting. ○ Meeting summary shall appropriately cover topics of discussion including key details and agreements.	▪ The kick-off meeting is held within 3 weeks of Task Order award, and no later than September 30 2017. ▪ The draft agenda is submitted to the WACOR at least 3 days prior to the meeting. ▪ 90% of all agenda topics are fully addressed during the meeting. ▪ 95% of the agenda and meeting summary shall be accurate, thorough, clear, concise, and free of spelling and grammar errors.
1.A.2 Coordination and Planning: The contractor shall be available for discussions with the WACOR about permit issuance progress and related topics.	○ The contractor shall maintain regular communications with the WACOR, the SWRCB liaison, and the Regional Water Boards' permitting liaisons. ○ The contractor shall notify the WACOR in a timely manner of any issues, concerns or potential schedule changes. ○ The contractor shall be responsive to WACOR inquiries. ○ Conversations with the WACOR about progress on permit drafting shall be held not less than monthly (e.g. as part of monthly update calls, below), or as requested by the WACOR.	▪ The contractor shall contact the WACOR, via telephone or email, at least once each month. ▪ The contractor shall notify the WACOR of any significant issues, concerns or potential schedule impacts within 3 days of identification. ▪ The contractor shall respond to WACOR inquiries or requests within 3 days. ▪ The contractor shall submit documentation of significant decisions or agreements to the WACOR within 3 days of interaction. ▪ 90% of the documentation shall be thorough, accurate, clear, concise and free of

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	○ The contractor shall confirm in writing any significant decisions or agreements. E-mail is an acceptable medium for written confirmations.	spelling or grammar errors.
1.A.3 Monthly Update Calls: The contractor shall participate in monthly update calls with EPA and the SWRCB.	○ Calls shall be held not less than monthly on a schedule agreed to between the WACOR, SWRCB representative, and the contractor. ○ Calls shall address the status of every active (assigned but not yet completed) permit being worked on under the Task Order, as listed in the Monthly Progress Report. ○ Contractor shall update the WACOR and SWRCB representative on any open issues, concerns or schedule changes; and shall be responsive to EPA and SWRCB inquiries.	▪ Call schedules are confirmed by the contractor not less than 1 week in advance. ▪ No monthly update calls are missed except by prior agreement with the WACOR, and calls which are rescheduled take place within 2 weeks of the original date. ▪ 90% of calls shall successfully address all ongoing work listed in the respective Monthly Progress Report. ▪ Issues which cannot be resolved on the call itself are responded to within 5 business days 90% of the time.
1.B.1 Tracking of Progress on Permit Issuance ("Tracking Spreadsheet"): The contractor shall maintain an accurate record of assigned work and projected interim and final dates.	○ The contractor shall prepare a tracking spreadsheet showing projected dates for the draft, review, correction and submission to Regional Water Boards of each assigned permit ○ The contractor shall ensure this spreadsheet remains up to date during performance of the TO. ○ The spreadsheet shall be in .XLS or .XLSX format and based on the template provided	▪ Initial Tracking Spreadsheet shall be crafted within 2 weeks of receiving the first Technical Directive assigning specific permits and shall be no less than 95% accurate. ▪ Updates to the Tracking Spreadsheet shall be made within 3 days of new Technical Directives or schedule changes made by the Regional Water Boards, at which point updated copies shall be sent to the WACOR and SWRCB. ▪ Spreadsheet meets the format specified.
1.B.2 Monthly	○ Permit Writing status shall be	▪ There shall be no

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Progress Reports: The contractor shall prepare and submit a report on permit-writing progress during each month.	reflected in, and consistent between, the monthly invoices and the monthly progress reports. o The monthly progress report document shall concisely and accurately detail current status on each permit, including progress, projected dates, major issues encountered, and upcoming milestones. o A report shall be submitted by the 10th day of each calendar month, covering activities during the previous calendar month. o The Monthly Progress Report shall distinguish between the Regional Water Boards when reporting work which has been conducted. o The progress report shall include an up-to-date version of the Tracking Spreadsheet, with highlighting for any changes made in the previous month to scheduled dates.	discrepancies between monthly progress reports and submitted invoices in 95% of cases. ▪ 95% of monthly progress reports shall contain all the required information for permits whose status has changed. ▪ 95% of monthly progress reports are delivered by the 10th-day-of-next-month deadline. ▪ Progress Reports are organized to distinguish between work performed for each regional board ▪ Progress reports highlight major issues with each permit, particularly any issues which affect multiple permits or multiple regional water boards. ▪ 95% of included Tracking Spreadsheets have correct highlighting of all changed dates, with notes on the cause of each change.
1.B.3 Itemized Invoices: Monthly invoices shall identify and distinguish work completed for each Regional Water Board separately.	o Monthly invoices shall include a list, by Regional Water Board, of all permits worked on in the preceding month and their status as of the date of the invoice.	▪ 100% of invoices are properly itemized in this fashion. 95% of invoices are found to be accurate when compared to which deliverables have been received by the WACOR.
1.B.4 Submission Requirements: The WACOR and SWRCB shall be copied on all significant submissions of documents, including submission of draft and final permits (deliverables) to the	o The WACOR and SWRCB representative shall receive copies of all draft and final permits prepared by the contractor at the same time as these deliverables are sent to the relevant Regional Water Board. o Documents shall be in either .DOC, .DOCX, or .PDF file	▪ 95% of submissions are appropriately copied to the WACOR and SWRCB representative upon submission, and all other submissions reach the WACOR and SWRCB representative within 3 days of being identified. ▪ 100% of submitted documents

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Regional Water boards.	formats (for text) or .XLS or .XLSX format (for spreadsheets) o Documents shall be accessible, functional and free from computer viruses or other technology problems.	conform to the formats listed ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection software, and checked for functionality (no corrupted files, etc.).
QA/QC Plan	If needed develop QA/QC plan for relevant permits. Need will be determined as part of kick-off meeting, or as additional permits are assigned.	If needed QA/QC plan must meet standards of EPA QC Section *(EPA QA/R-5).* QA performance shall be in conformance with the *Office of Water Quality Management Plan of 2001.*

Task C-2

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
Task 2 (all subtasks): Prepare draft NPDES permits - As listed in the table above, complete contractor activities 1, 2, 3, and 7, plus the specified number of additional contractor activities as directed in each subtask above.	o Draft documents (RPAs, issue papers, permit drafts, administrative drafts etc.) shall be submitted in accordance with the schedule above, starting on the date a facility is assigned as part of a Technical Directive from the WACOR. o Permit drafts shall be delivered on or before the designated submission date agreed with the Regional Water Board. o Permit drafts shall be substantially free from factual or regulatory errors, and require only minimal revision by the issuing Water Board o Draft permits must be professionally written and carefully edited and proofread o All permitting drafts must be in full compliance with all applicable laws. o Documents shall be in either	▪ Permit drafts and other permit components shall be delivered on time, relative to the schedule listed in Table 1, 100% of the time unless prior arrangements for alternate schedules are made with the Regional Water Board before the final due date. ▪ 95% of delivered documents shall require only minimal editing, excepting edits made at the discretion of the Regional Water Board. ▪ 100% of submitted documents conform to the formats listed. ▪ Before submission, all documents are scanned for viruses, harmful macros, and similar issues using standard virus-protection

PERFORMANCE REQUIREMENT	PERFORMANCE STANDARD	ACCEPTABLE QUALITY LEVEL (AQL)
	.DOC, .DOCX, or .PDF file formats (for text) or .XLS or .XLSX format (for spreadsheets) o Documents shall be accessible, functional and free from computer viruses or other technology problems.	software, and checked for functionality (no corrupted files, etc.).
Contractor shall utilize California's NPDES Quality Assurance Program Plan (QAPrP) for sub-tasks associated with ICIS data entry and coding training.	Contractor shall be familiar with SWRCB QAPrP and rely on guidance therein to accomplish the goal of using data of known quality.	Data entry and permit coding training will follow and/or include guidance provided within SWRCB QAPrP.

PERFORMANCE SURVEILLANCE PLAN			
Performance Requirement	**Measurable Performance Standards**	**Surveillance Methods**	**Incentives/Disincentives**
Management and Communications: During the life of this work assignment, the Contractor shall notify EPA immediately of any issues that may impact the timeliness of deliverables of the problems associated with the development of deliverables.	The Contractor shall maintain contact with the WACOR throughout the performance of the work assignment. The contractor shall identify to the WACOR any delays with regard to deliverables not less than one week prior to the deliverable date that has been established in the work assignment or technical direction document. The contractor shall identify to the WACOR any issues or concerns that have a direct impact on project schedules within three (3) days of occurrence. The contractor shall provide options for EPA's consideration on resolving or mitigating the impacts identified.	WACOR and CL-COR (as necessary) will allocate the time needed to discuss and address all issues identified by the Contractor. The WACOR and CL-COR will document and maintain a complete record of the issues, agreements and outcome. The WACOR and CL-COR will review monthly progress reports for indicators of problems not previously mentioned. The WACOR will also monitor the timely receipt of deliverables. For those that are late without prior notice, the EPA will formally document to the Contracting Officer the late delivery.	If the contractor fails to implement corrective actions after EPA identifies and provided written documentation of performance issues, EPA will rate this performance category "unsatisfactory." If three or more the active work assignments for the period are rated unsatisfactory, EPA will rate the Business Relations category as unsatisfactory in the CPARS Contract Performance System.

Cost Management and Control: The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where practical.	The Contractor shall monitor, track and accurately report level of effort, labor cost, other direct cost and fee expenditures to EPA through monthly progress reports and approved special reporting requirements. The Contractor shall assign appropriately leveled and skilled personnel to all tasks. The contractor should not exceed established work assignment ceilings and, in general, should expend dollars and hours at similar ratios. If either the expenditure of hours or dollars deviates significantly, the contractor shall provide an explanation in its Monthly Progress Report.	The CL-COR will routinely meet with the Contractor's Project Manager to discuss the work progress and contract and individual work assignment level expenditures. The CL-COR and WACOR shall review the Contractor's monthly progress reports and request the Work Assignment Contracting Officer's Representative to ensure that ceilings are not exceeded, that progress is being made, and that the contractor is effectively utilizing the LOE provided under the work assignment.	EPA will thoroughly review work assignment funding ceiling overruns to determine the contractor's ability to control the situation. If EPA determines that the contractor failed to control cost, the contractor will be rated "unsatisfactory" in this category. Multiple incidents of work assignment overrun that result in an overall cost overrun of greater than 4% of the approved total work assignment funding for the current contract period, will result in an unsatisfactory rating in the CPARS Contract Performance System.
Quality of Product/Services: The contractor shall ensure documents developed under this task order are quality products that are factual and based on sound science and engineering principles.	Products delivered under this work assignment must not contain any major factual errors. The analyses provided in each product shall be logical, consistent, and defensible.	The WACOR will review all documents delivered under this work assignment for content accuracy.	If EPA determines that the contractor's analyses is factually inaccurate or if significant technical errors are found in any documents produced by the contractor, EPA may determine that the cost associated with redoing the work shall be borne by the contractor. Multiple incidents of this nature under the contract will result in an unsatisfactory rating for Quality and Manage Control being reported to the CPARS Contract Performance System.