EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-14

☐ Other ☐ Amendment Number:

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 2	O&M of PMOS and eNOI

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 07/01/2018 To 06/30/2019

Comments:
The contractor shall not commence work on this work assignment until 7/1/2018.

☐ 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 06/30/2021 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 Jackie Clark (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-6582 FAX Number:	
Project Officer Name Robin Danesi (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-1846 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 6/30/2018 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 2-14

TITLE: Performance Measures Tracking, Data Analysis, and Operations and Maintenance of PMOS and eNOI

WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):

Jacqueline M. Carroll Clark **Phone:** 202-564-6582 **Fax:** 202-564-9544 clark.jackie@epa.gov	**USPS Mailing Address** Mail Code 4203M 1200 Pennsylvania Ave Washington, D.C. 20460	**Courier Address** 1201 Constitution Ave Washington, D.C. 20004

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

Jennifer Molloy **Phone:** 202-564-1939 **Fax:** 202-564-9544 molloy.jennifer@epa.gov	**USPS Mailing Address** Mail Code 4203M 1200 Pennsylvania Ave Washington, D.C. 20460	**Courier Address** 1201 Constitution Ave Washington, D.C. 20004

PERIOD OF PERFORMANCE: July 1, 2018 through June 30, 2019

BACKGROUND: EPA is responsible for development and implementation of the National Pollutant Discharge Elimination System (NPDES) permits program. This program regulates point source discharges of pollutants to surface waters of the United States. In 46 States and 1 Territory, this responsibility is held by authorized State and Territorial governments. EPA is the permitting authority in 4 states (ID, MA, NH, NM), most U.S. territories, Indian Country, and for some federal facilities. The Idaho Department of Environmental Quality is in the process of obtaining authorization to manage the NPDES program in that state and is anticipated to begin managing the program in phases over the next several years.

Permitting authorities issue individual and general permits for discharges to waters of the United States and these permits implement the requirements of the NPDES Program along with other applicable laws and regulations.

The Water Permits Division (WPD), within the Office of Wastewater Management (OWM), is responsible for implementation and oversight of the NPDES permits program. Some of WPD's

oversight functions include tracking the status of permits, implementing programs that prioritize permits, and developing management tools.

The NPDES Electronic Notice of Intent (eNOI) System is an online electronic permit application system that allows operators to apply for and terminate coverage under EPA NPDES general permits and submit other required reports. Historically, eNOI has supported the Construction General Permit (CGP), the Pesticides General Permit (PGP), the Multi-Sector General Permit (MSGP), and the Vessel General Permit (VGP), but currently only still supports the PGP.

Also, in 1998, the Office of the Inspector General (OIG) identified the backlog of NPDES permits as a management weakness. One of the key problems facing EPA was the lack of reliable information in its Permit Compliance System (PCS) on the numbers of facilities. Starting in late 1998, EPA began tracking the universe of individual permits and their status using PCS and continues to track permit status as part of its oversight activities. In 2013, the transition of all states to a new database, the Integrated Compliance Information System (ICIS-NPDES), was completed. However, because ICIS-NPDES still lacks a complete universe of permittees, particularly general permit covered facilities, and cannot easily identify tribal permits, EPA uses the Permit Management Oversight System (PMOS) to manage these data. PMOS enables EPA to track general permits and tribal permits at a summary level. That is, PMOS captures limited information on these permits to enable EPA to track the universe and status of these permits.

EPA puts special focus on the reissuance of permits considered to be environmentally or programmatically significant through the Priority Permits measures. Each year, EPA Headquarters provides State and Regional permitting authorities with a list of candidate priority permits each year. From this candidate list, States and Regions are asked to select priority permits based on programmatic and environmental criteria and commit to issuing a portion of these permits over each fiscal year. This process entails developing the candidate list and loading it onto PMOS, which is designed to manage the designation and tracking of priority permits.

Both eNOI and PMOS general permit data are made available through search tools on EPA's website that provide transparency to these data that may not be available in any other capacity on a nationwide basis.

Currently, EPA is also focusing on improving permit timeliness through Lean events and associated follow up, including data analyses and new performance measures examining the status and lead time for permit applications, NOIs, modifications, and certain steps in the permit issuance process.

EPA requests contractor support to help track and analyze the data used to characterize the health of the NPDES program, including the management of PMOS, eNOI, and the associated public search tools, as described above.

PURPOSE AND OBJECTIVE: During the period of performance, the contractor, under this Work Assignment, will provide services in the following areas:

1. Generate permit backlog reports
2. Support EPA's management of the priority permits process
3. Maintain and, if needed, provide development services for PMOS to manage priority, tribal, and general permits
4. Provide ad hoc support related to permit tracking activities
5. Perform ad hoc data analyses
6. Maintain and Update eNOI Processing Systems
7. Provide Region, State and Public Access to Permit Documents and Assist with Data Requests
8. Maintain and, if necessary, develop and distribute new training tools for EPA eNOI System Users
9. Provide User Support (email and telephone) for the eNOI System
10. Support paper processing of reports for entry into the eNOI System
11. Maintain public search tools for eNOI and general permit data

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 labor hours and cost expenditures by individual tasks and subtasks, issues encountered, and lessons learned regarding the progress of all tasks, the tracking of expenditures, and any other administrative activities. The contractor shall report by the 15th of each month. The contractor shall maintain a cumulative list of all technical directives. The contractor shall notify the EPA CO and WACOR and/or Alternative WACOR in writing of expenditure reaching 50%, 75%, and 90% of the authorized LOE/labor hours. The contractor shall report in accordance with Contract Reporting Requirements.

Deliverables		Due Date
1	QAAP based on this PWS	Within 10 days of Work Assignment approval
2	Monthly progress report that will include the labor hours and cost expenditures by individual subtasks, issues encountered and lessons learned regarding the	By the 15th of each month

	progress of all tasks, the tracking of expenditures, and any other administrative activities.	
3	Notification in writing to the CO and WACOR of expenditures reaching 50%, 75% and 90% of the authorized Work Assignment LOE/labor hours.	No less than 15 days in advance of expenditures reaching 50%, 75% and 90% of the authorized Work Assignment LOE/labor hours

TASK 1: Data Reports

Subtask 1A: NPDES Priority Permits Tracking

Based on the existing information in PMOS and input provided by the WACOR from states, EPA Regions, and ICIS-NPDES, the contractor shall update Fiscal Year 2018 priority permit information on an as needed basis in PMOS, including updating issuance information and other basic data, as well as completing priority permit swaps.

For planning purposes, the contractor shall assume up to two comprehensive updates to Fiscal Year 2018 Priority Permits data in PMOS using ICIS-NPDES data from the WACOR and many updates on an ad hoc basis using data provided by state and EPA Regions during the period of performance.

Additionally, based on data provided by the WACOR from ICIS-NPDES, the contractor shall create the Fiscal Year 2019 Priority Permit candidate list. The contractor shall also update this list based on data provided by the WACOR from ICIS-NPDES, states, and EPA Regions.

Deliverables: The contractor shall provide deliverables according to the schedule in the table below:

Deliverables		Due Date
1	Update Fiscal Year 2018 priority permit information on an as needed basis in PMOS	Within 5 business days following the request from WACOR
2	Draft and updated list of candidate priority permits in MS Excel for Fiscal Year 2019	Within 5 business days following the request from WACOR

Subtask 1B: NPDES Permit Backlog Tracking

The contractor shall provide technical support to track the NPDES Permit Backlog. The contractor shall generate and update the End of Year Fiscal Year 2018 and Mid-Year Fiscal Year 2019 Tribal and Non-Tribal backlog reports in accordance with the deliverable schedule below. The contractor shall use data from PMOS and ICIS-NPDES, along with information provided by the WACOR from EPA Regions and states to prepare and update these reports. The contactor shall also provide the detailed data corresponding to the summary numbers in the reports to the WACOR.

The contractor shall also provide support to ensure that the tribal and general permit data in PMOS are complete and accurate, based on the data from states and EPA Regions, as well as data from ICIS-NPDES provided by the WACOR.

The contractor shall also provide ad hoc reports on the permit universe and/or backlog data, as requested by EPA.

For planning purposes, the Contractor shall assume one draft Tribal and Non-Tribal Report and up to two updated versions of these reports following receipt of data from states and EPA Regions. The Contractor shall also assume up to two ad hoc report requests during the period of performance.

All reports and corresponding data shall be provided in Excel format to the WACOR.

Deliverables: The contractor shall provide deliverables according to the schedule in the table below:

Deliverables		**Due Date for 1 through 4**
1	Draft and Updated Non-Tribal Report Cards End of Year FY18 and Mid-Year FY19 (major individual, minor individual, non-stormwater general permit covered facilities, summary) for non-tribal facilities.	Draft and updated reports are due 5 business days after receipt of all the corresponding permit data from the WACOR
2	Draft and Updated Tribal Report Cards End of Year FY18 and Mid-Year FY19 (major individual, minor individual, non-stormwater general permit covered facilities, summary) for tribal facilities.	
3	Draft and Updated List of all facilities included in the backlog universe End of Year FY18 and Mid-Year FY19 (major individual, minor individual, total individual) for tribal and non-tribal permits.	
4	Draft and Updated List of all backlogged facilities End of Year FY18 and Mid-Year FY19 (major individual, minor individual, total individual) for tribal and non-tribal permits.	
Deliverables		**Due Date for 5**
5	Ad hoc reports for additional unanticipated support	Within 5 business days of request by EPA COR

Subtask 1C: Other Ad Hoc NPDES Data Analysis

The contractor shall provide technical support related to ad hoc data analysis requests, as needed, including those related to the NPDES Lean effort. The contractor shall generate and update reports in accordance with the deliverable schedule below. The contractor shall use data from PMOS and ICIS-NPDES, along with information provided by the WACOR from EPA Regions and states to prepare and update these reports, as needed. The contactor shall provide the detailed data as well as summary-level information in the reports to the WACOR, as further describe in technical direction from the WACOR for each data request.

For planning purposes, the Contractor shall assume up to four report requests during the period of performance.

All reports and corresponding data shall be provided in Excel format to the WACOR.

Deliverables: The contractor shall provide deliverables according to the schedule in the table below:

Deliverables		Due Date
1	**Ad hoc reports** for additional unanticipated support	Within 5 business days of request by EPA COR

TASK 2: PMOS Operations and Management

The Contractor shall be responsible for general operations and maintenance of PMOS and shall fix all bugs found as part of routine operational requirements. The contractor shall also assist in upgrades to the PMOS system, if needed, as well as updates to user guide documents if the WACOR identifies any as necessary. The contractor shall also provide user assistance to EPA Regions and states on PMOS questions and assist in giving new users access to PMOS, as directed by the WACOR.

PMOS non-stormwater and stormwater general permit data will also be used for the General Permits Web Inventory, which will be coordinated with the work on Advance Public Search tools under Task 5.

For planning purposes, the contractor shall assume two backups of the files for priority permits status per month.

Deliverables:

Deliverables		Due Date
1	Daily maintenance/de-bugging	As necessary to maintain database functionality
2	Ad hoc user assistance over email or phone regarding PMOS questions	Within 1 business day of request from the WACOR
3	Updates to PMOS User Guide Documents	Within 10 business days of request from the WACOR
4	Backup files of the Priority Permits status information from the PMOS database, in MS Access format.	Within 1 business day of request from the WACOR
5	Ad hoc batch updates of issuance progress and other permit-related information in PMOS	Within 5 business days of request from the WACOR
6	PMOS Priority Permits lockdown and rollover for the change in fiscal year	Within 5 business days of request from the WACOR

TASK 3: eNOI CUSTOMER SUPPORT AND PAPER PROCESSING

Subtask 3A: eNOI Customer Support and Paper Processing

The contractor shall provide customer support for processing and submitting required reports into the eNOI system. The contractor shall also provide user support as described below for answering eNOI system-related and administrative questions from both the regulated and regulatory communities.

The contractor shall defer all regulatory and policy questions to the WACOR. The contractor shall keep the WACOR informed of the questions the contractor is addressing in a timely manner. The contractor shall also perform checks to meet a goal of entering all paper forms received into the electronic system within 3 days of receipt (and no more than 1 week during peak times) and checking for any data errors as specified by the PWS.

Customer and NOI Call Center Support

The contractor shall answer calls between 9:00am and 5:00pm EST, Monday through Friday. The contractor shall provide a messaging service for voicemails of calls received after 5:00pm EST, Monday through Friday, and for calls made when all call center representatives are on the line and/or not able to pick up. The contractor shall return voicemails within 1 business day to the extent possible. The contractor shall customize voicemail messages at the client's direction to provide additional user guidance and/or to incorporate short term changes in processes and service.

Incoming and Outgoing Email Support

The contractor shall respond to emails within the order of receipt and within no more than 3 business days. The email and technical support provided by the contractor is regulatory, and all support information provided in email by the contractor shall come from approved support documentation developed by the contractor and approved by EPA.

Data Requests

The contractor shall ensure that NPDES permittee data is accessible to EPA Headquarters, EPA Regions, and states. Permittee data shall be available in both print and electronic form. The contractor shall respond to EPA Headquarters, EPA Regions, and states' data requests for NPDES permittee data, annual and ad hoc reports, and DMRs in a timely manner.

The contractor shall prepare and transmit NPDES permittee data in response to requests from the WACOR, which may be in response to Freedom of Information Act (FOIA) or other types of requests.

Paper NOI Processing

The contractor shall provide support to process and enter paper forms including NOIs, NOTs, and monitoring reports into the eNOI system. The contractor shall defer all regulatory or policy decision questions to the WACOR. The contractor shall keep the WACOR informed of the questions the contractor is addressing in a timely manner. The contractor shall also perform checks to ensure that all paper forms received have been entered into the electronic system within 3 days of receipt (no more than 1 week during peak times) and checking for any data errors as specified by the PWS.

QA/QC of Paper Processing Systems and Call Center

The contractor shall conduct Quality Assurance and Quality Control of the eNOI system and paper processing system. The eNOI and NOI processing QA/QC procedures are outlined in the QA/QC manual chapter, which entail running data validation reports to quickly identify and remedy any system-wide errors. The contractor shall develop and revise automated data validation queries to the system as needed. Automated data validation queries will verify data issues within the system. The contractor shall notify the WACOR immediately if data errors are identified and to correct the error. The contractor will meet weekly to review any outstanding items in the NOI processing center and ensure that all paper processing is being completed on time and any forms or customer requests are discussed by the entire team and management to ensure that the service being provided is consistent and accurate.

Deliverables		Due Date
1	eNOI Data Requests	As specified in technical direction from WACOR
2	Ad hoc customer support for eNOI, including response to calls and emails, as well as processing of paper forms	Within 3 days of receipt (no more than 1 week during peak times)

TASK 4 - MAINTENANCE AND OPERATION OF ENOI SYSTEMS AND ADVANCED PUBLIC SEARCH TOOLS

Subtask 4a – eNOI System Maintenance and Operation

The contractor shall perform minimal application enhancements and maintenance to the 2016 Pesticide General Permit eNOI system consistent with EPA's National Computing Center (NCC) guidance and technical standards and its system requirements. The contractor development team shall communicate with the NOI Processing Center to identify inconsistencies in the functionality of the application and shall investigate each reported issue. The investigation of the issue shall result in proper documentation, application testing in staging and/or production environments, code refactoring and an application release.

The contractor shall provide support for the maintenance of previous CGP, MSGP, PGP, and VGP applications and associated components in the eNOI legacy system and will notify the

WACOR of any outstanding issues requires attention to address a system user need. The contractor will take action to address any issue as directed by the WACOR.

Subtask 4b – Maintenance of System Tools

The contractor shall continue basic maintenance of existing MSGP, PGP, CGP, VGP, and General Permit Inventory Advanced Public Search tools until otherwise instructed by the WACOR. The contractor shall notify the WACOR of any reported issues with any of these tools and take action to address these issues as directed by the WACOR. Any necessary modifications shall result in proper documentation, application testing in staging and/or production environments, code refactoring, and an application release, as appropriate.

Subtask 4c – Data Maintenance of EPA Permits in the eNOI System

The contractor shall perform data-related maintenance in the current eNOI system to ensure proper operation and functionality. This type of maintenance will resolve data inconsistencies or any type of issues in the database that affects proper operation of eNOI functionalities as reported by users. This also includes uploading any DMRs and Annual Reports into the Advanced Public Search tool. The contractor shall handle all data-related maintenance issues, including the tracking and prioritization of bugs and errors. The contractor shall report bugs and error fixes to the WACOR within 3 business days of identification of a bug and shall provide technical feedback on the fixes in the issue tracking system.

Subtask 4d - Pesticide General Permit PGP Data Analysis

The contractor shall prepare a document summarizing data collected from the PGP Notice of Intent (NOI) and Annual Reports. The summary shall include but is not limited to the following: breakdown of the total number of new permittees; types of permittees; types of use patterns; number of pest management areas; number and size of treatment areas; and name, amount and EPA registration number of pesticides use. The contractor shall submit a draft compilation within three weeks after technical direction from the WACOR and a final summary within two weeks of WACOR comments on the draft summary.

Deliverables		**Due Date**
1	Notification of Need for eNOI System Update	Within 2 business days of identification of a need for a system update.
2	Notification of Need for eNOI Search Tool Update	Within 2 business days of identification of a need for a system application update.
3	System Bug Notification	Within 1 business day of identification of a new system bug affecting system performance
4	PGP Data Analysis	Draft report 3 weeks after technical direction, final report 2 weeks after any comments from WACOR

TASK 5: ENOI SYSTEM CENTER DOCUMENTATION

The EPA NOI Processing Center Operations Manual documents all NOI Processing Center functions. It provides detailed descriptions of how the NOI Processing Center receives, handles, and processes correspondence (letters and emails), maintains contact with permit applicants via the letters generated, and provides support through customer service. The original EPA NOI Processing Center Operations Manual was developed in 2003 and has been updated periodically since that time. The contractor shall update the manual, as necessary, to incorporate all aspects of the current eNOI system and shall include the most current forms and letters associated with the eNOI dataflow.

System Application/Data Maintenance Documentation

The contractor shall maintain the existing EPA NOI Processing Center Operations Handbook describing the business rules and functionality of all application systems. In addition, any new development and coding shall be documented in this handbook. Any updated eNOI system documentation should be completed within two weeks after delivery of system maintenance releases. The contractor shall retain a copy of that documentation on-site and make available to the WACOR upon request. Based on any comments from the WACOR, the contractor shall revise this documentation within one week after receipt of comments.

Public Search Documentation

The contractor shall maintain an up-to-date EPA NOI Processing Center Operations Handbook describing the business rules and functionality of the Advanced Public Search application for EPA general permits. In addition, any new development and coding should be documented in this manual.

The contractor shall maintain the existing EPA NOI Processing Center Operations Handbook documenting the business rules and current operational procedures for the PGP, CGP (and LEW), VGP, and MSGP (and NOE) Advanced Public Search, and General Permit Web Inventory development and maintenance releases that describes the functionality of the Public Search tool. Any updated eNOI system public search documentation should be completed within two weeks after delivery of system maintenance releases. The contractor shall retain a copy of that documentation on-site and make available to the WACOR upon request. Based on any comments from the WACOR, the contractor shall revise this documentation within one week after receipt of comments.

Deliverables		**Due Date**
1	NOI System Handbook Update	Within 2 weeks of system update and within 1 week of any WACOR comments

DELIVERABLES REQUIRED AND SCHEDULE FOR COMPLETION OF TASKS

Task	Item Required	Due Date	Number of Copies and Format Requirements
0	QAAP based on this PWS	Within 10 days of Work Assignment approval	One Copy, Microsoft Word or PDF
0	Monthly progress report that will include the labor hours and cost expenditures by individual subtasks, issues encountered and lessons learned regarding the progress of all tasks, the tracking of expenditures, and any other administrative activities.	By the 15th of each month	One Copy, Microsoft Word or PDF
0	Notification in writing to the CO and WACOR of expenditures reaching 50%, 75% and 90% of the authorized Work Assignment LOE/labor hours.	No less than 15 days in advance of expenditures reaching 50%, 75% and 90% of the authorized LOE/labor hours	One copy to CO and one to WACOR via Email
1A	Update Fiscal Year 2018 priority permit information on an as needed basis in PMOS.	Within 5 business days following the request from WACOR	Via database
1A	Draft and Updated List of candidate priority permits for Fiscal Year 2019.	Within 5 business days following the request from WACOR	One Copy, Microsoft Excel
1B	Draft and Updated Non-Tribal Report card (major individual, minor individual, non-stormwater general permit covered facilities, summary) for non-tribal facilities.	Draft and updated reports are due 5 business days after receipt of all the corresponding permit data from the WACOR	One Copy, Microsoft Excel
1B	Draft and Updated Tribal Report card (major individual, minor individual, non-stormwater general permit covered facilities, summary) for tribal facilities.	Draft and updated reports are due 5 business days after receipt of all the corresponding permit data from the WACOR	One Copy, Microsoft Excel

1B	Draft and Updated List of all facilities included in the backlog universe (major individual, minor individual, total individual) for tribal and non-tribal permits.	Draft and updated reports are due 5 business days after receipt of all the corresponding permit data from the WACOR	One Copy, Microsoft Excel
1B	Draft and Updated List of all backlogged facilities (major individual, minor individual, total individual) for tribal and non-tribal permits.	Draft and updated reports are due 5 business days after receipt of all the corresponding permit data from the WACOR	One Copy, Microsoft Excel
1B	Ad hoc reports for additional backlog tracking support	Within 5 business days of request by EPA COR	One Copy, Microsoft Excel
1C	Ad hoc reports for additional data analysis support	Within 5 business days of request by EPA COR	One Copy, Microsoft Excel
2	Daily PMOS maintenance/de-bugging	As necessary to maintain database functionality	Via database
2	Ad hoc user assistance over email or phone regarding PMOS questions	Within 1 business day of request from the WACOR	Via phone or email
2	Updates to PMOS User Guide Documents	Within 10 business days of request from the WACOR	One Copy, Microsoft Word
2	Backup files of the Priority Permits status information from the PMOS database, in MS Access format.	Within 1 business day of request from the WACOR	One Copy, Microsoft Access
2	Ad hoc batch updates of issuance progress and other permit-related information in PMOS	Within 5 business days of request from the WACOR	Via database
2	Priority Permits lockdown and rollover for the FY in PMOS	Within 5 business days of request from the WACOR	Via database
3	eNOI Data Requests	As specified in technical direction from WACOR	As specified in technical direction from WACOR
3	Ad hoc customer support for eNOI, including response to calls and emails, as well as processing of paper forms	Within 3 days of receipt (no more than 1 week during peak times)	Via phone, email, or database

4a	Notification of Need for eNOI System Update	Within 2 business days of identification of a need for a system update.	Email to WACOR, with any follow-up in agreed upon time and format.
4b	Notification of Need for eNOI Search Tool Update	Within 2 business days of identification of a need for a system application update.	Email to WACOR, with any follow-up in agreed upon time and format.
4c	System Bug Notification	Within 1 business day of identification of a new system bug affecting system performance	Email to WACOR, with any follow-up in agreed upon time and format.
4d	PGP Data Analysis	Draft report 3 weeks after technical direction, final report 2 weeks after any comments from WACOR	1 copy – Microsoft Word or PDF
5	NOI System Handbook Update	Within 2 weeks of system update and within 1 week of any WACOR comments	If requested by WACOR, in agreed upon format.

CONTRACT PWS REFERENCE

Task 1: 3.3 – Water Program Rulemaking and 3.5 – NPDES Permit Support
Task 2 3.3 – Water Program Rulemaking and 3.5 – NPDES Permit Support
Task 3: 3.4 – Technical and Administrative Program Support and 6.2 – Provide Educational and Outreach Support
Task 4: 3.4 – Technical and Administrative Program Support and 3.5 – NPDES Permit Support, and 3.7 – Information Management
Task 5: Contract Sections: 3.4 – Technical and Administrative Program Support and 3.5 – NPDES Permit Support

ANTICIPATED TRAVEL REQUIREMENTS

All travel shall be approved in advance by the Contract-Level Contracting Officer's Representative (CLCOR) 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 CLCOR 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 CLCOR.

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):

A quality assurance project plan (QAPP) is required for this Work Assignment because it involves the generation, management, distribution, or use of primary and/or secondary environmental data that will be used or have the potential for use in environmental decision-making. The QAPP shall be developed in accordance with the "Office of Water Quality Management Plan" (EPA 821-X-02-001) and shall be formatted as specified in "EPA Requirements for Quality Assurance Project Plans" (EPA QA/R-5).

EPA requires that all environmental data used in decision-making be supported by an approved QAPP. The contractor shall follow the written procedures in the processing manual and any additional guidance provided by the COR in the performance of these tasks.

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: 2-16

☐ Other ☐ Amendment Number:

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 2	Tech Support for NPDES & PQRs

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 07/01/2018 To 06/30/2019

Comments:
The contractor shall not commence work on this work assignment until 7/1/2018.

☐ 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 06/30/2021 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 Janita Aguirre (Signature) (Date)	Branch/Mail Code: Phone Number: 202-566-1149 FAX Number:	
Project Officer Name Robin Danesi (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-1846 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 6/30/2018 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 2-16

Title: Technical Support for NPDES Program and Permit Quality Reviews

Work Assignment Contracting Officer's Representative (WACOR):

Janita Aguirre	**USPS Mailing Address**	**Courier Address**
Phone: (202) 566-1149	Water Permits Division	EPA East Building
Fax (202) 564-9544	1200 Pennsylvania Ave., NW	1201 Constitution Ave., NW
aguirre.janita@epa.gov	Mail Code 4203M	Room 7135D½
	Washington, DC 20460	Washington, DC 20004

Alternate Work Assignment Contracting Officer's Representative (AWACOR):

David Hair	**USPS Mailing Address**	**Courier Address**
Phone: (202) 564-2287	Water Permits Division	EPA East Building
Fax (202) 564-9544	1200 Pennsylvania Ave., NW	1201 Constitution Ave., NW
hair.david@epa.gov	Mail Code 4203M	Room 7126
	Washington, DC 20460	Washington, DC 20004

Period of Performance: July 1, 2018 through June 30, 2019

Level of Effort: EPA estimates 864 hours will be required to support the activities outlined below.

Background: An important component of a healthy National Pollutant Discharge Elimination System (NPDES) program is permit quality. Program and Permit Quality Reviews (PQRs) allow permitting authorities (during both issuance and oversight processes) to obtain information about the functioning of various aspects of the program and its potential to maintain and improve water quality.

This is particularly important as EPA works to achieve the goals of ensuring waters support designated uses or improving water segments and protecting streams from becoming impaired (maintaining uses). Permits that are written to meet these goals are critical in combination with other Clean Water Act water quality programs in achieving these objectives.

The NPDES program has used a variety of tools over the course of the last three decades to enhance program and permit quality. These methods have included reviews of draft permits using standard checklists, and PQRs. Reviews can be used to enhance specific programs or determine where additional guidance is needed. Most importantly, program and permit quality reviews can be used to improve the integrity of the program and will help EPA improve our ability to measure the success of the program.

Through this review mechanism, EPA promotes national consistency, identifies successes in

implementation of the base NPDES program, as well as opportunities for improvement in the development of NPDES permits. The findings of the reviews may be used to identify areas for training or guidance and to identify or assist states in determining any needed action items to improve their NPDES programs.

Under this work assignment, EPA seeks support in updating draft methodology to allow EPA regions to manage the reviews, and assistance with conducting reviews of state programs and drafting reports outlining the results of the reviews. This scope of work includes implementation of permit quality reviews and results management.

Scope of Work:

This work assignment provides support to the Water Permits Division (WPD) to implement permitting oversight through a quality review process, as well as finalizing tools to ensure continual improvement of the NPDES permitting program. The Contractor shall provide technical support to EPA for the tasks described below. Support under the work assignment may require the Contractor to perform on a rapid response, quick turn-around basis.

Task 0: Kickoff Meeting

A kickoff meeting will be held to review the work statement and clarify the work to be performed. The contractor's work assignment manager and appropriate EPA staff and WACOR should attend. This meeting will be held by teleconference and may occur before the work plan is submitted to EPA.

Task 0 Deliverables: There are no deliverables associated with this task.

Task 1: Technical and Administrative Support for Implementing PQRs

The contractor shall support the implementation of:

- Up to seven (7) Region-led PQRs during the period of performance, some of which may have been partially conducted during the prior option period;
- One (1) headquarters-led PQR of Region-issued permits for facilities on tribal lands and U.S. territories;
- Final formatting and copy review of up to five (5) reports completed by EPA regional offices.

Implementation of these reviews include planning and coordination with EPA headquarters and EPA regional staff, and review of permits in accordance with existing SOPs, consisting of both a comprehensive program review and topic specific reviews. Task 1 should be supported by staff with at least 10 years of experience writing and/or reviewing NPDES permits; alternate experience may be substituted at the discretion of the EPA work assignment manager.

The tentative schedule for upcoming Region-led PQRs is as follows:

PQR No.	PQR Topic/Type	Schedule (tentative)
#1	Regional PQR (Region 5): Illinois	Spring 2018
#2	Regional PQR (Region 3): Delaware	Spring 2018
#3	Regional PQR (Region 8): South Dakota	Summer 2018
#4	Regional PQR: TBD	TBD
#5	Regional PQR: TBD	TBD
#6	Regional PQR: TBD	TBD
#7	Regional PQR: TBD	TBD

The contractor shall support EPA in implementing these reviews. This shall include the collection of permits and fact sheets from permitting authorities identified by regional staff, regulations, and policies, as appropriate. PQRs are conducted using the Standard Operating Procedures and tools currently posted on EPA's NPDES website: https://www.epa.gov/npdes/npdes-permit-quality-review-standard-operating-procedures

The contractor shall support WPD in conducting site visits for up to seven Region-led reviews. Each PQR will consist of approximately 10 permits from the states listed above. The details of the number of site visits and permits reviewed may be adjusted by the WACOR based on the unique characteristics of each state and region. Typically, contractor staff review no more than six permits per state.

The contractor shall review materials prior to any site visits, discuss preliminary review findings with EPA, and participate in site visits to regional and state offices. Site visits involve reviewing permit files and administrative records for core review permits, assisting EPA in interviewing permit writers and understanding the complete permit writing process within the State.

The headquarters-led review will require no travel or site visits. Desktop reviews of permits, fact sheets, and applications will be used for this review. In addition, some background research, primarily phone interviews and email communications with personnel in EPA's regional offices, will be required in order to obtain sufficient information to draft the background and process portions of the report.

The contractor shall develop a draft report providing a comprehensive summary of findings and recommendations from the core reviews following the site visits, including draft recommendations for improving quality of permits within specific regions and/or permitting authorities, using the report template developed by EPA (available with the SOP documents referenced above). Examples of complete reports can be found online at https://www.epa.gov/npdes/regional-and-state-npdes-pqr-reports. For reviews supported by the contractor, the contractor typically drafts the background sections and the Core Review Findings section, and the appropriately associated portions of the Action Items section. For headquarters-led PQRs, EPA may request additional permit reviews and drafting of report language for other sections of the report such as the national topic areas. On rare occasions, EPA may request the contractor perform similar additional reviews and develop report language for Region-led reviews.

The contractor shall edit and finalize reports after they have undergone reviews by EPA headquarters, regions and states. This includes assisting EPA in finalizing reports for regions previously conducted in addition to developing and finalizing reports for the upcoming reviews. This may include assistance with formatting drafts and using the Word template.

Task 1 Deliverables: The contractor shall provide draft reports 30 days after PQR site visit is completed. EPA will review draft reports and provide comments back to contractor within 30 days of receipt of draft report. The contractor shall provide the final draft report within 7 business days after receipt of EPA comments.

Task 2: Develop PQR Tools

The contractor shall assist in the development and/or updating of tools to support the FY18-22 PQR cycle. This may include formatting draft documents or editing existing documents to reflect process changes that will be implemented in the new cycle. This includes drafting new tools to assess national topic areas that are not part of the previous PQR cycle.

Task 2 should be supported by staff experienced in both writing and/or reviewing NPDES permits and developing standard evaluation tools. Additional support will be needed from staff with experience creating and formatting documents such as checklists, standard operating procedure manuals, and report templates in both Word and PDF formats. Ideally, one staff member supporting this task should have direct experience using existing PQR tools.

Task 2 Deliverables: The contractor shall provide draft tools/summaries within 10 business days after EPA WAM request for draft PQR tools through written technical directives. EPA will review draft documents and provide comments back to contractor within 30 days of receipt of draft documents. Final tools/summaries are due 7 business days from receipt of EPA comments. Final documents should be provided in both Word and PDF formats. Final PQR tools that will be posted online must be compliant with Section 508 of the Rehabilitation Act of 1973 (as amended) (29 USC § 794d).

Task 3: Regional Assistance

The contractor shall assist in the review of state materials, such as standard conditions and templates, as needed by EPA regions in conducting PQRs as outlined in Task 1, to ensure compliance with the Clean Water Act and appropriate NPDES regulations at 40 CFR part 122. Comments will be due 14 days from receipt of documents from EPA.

OTHER REQUIREMENTS

Quality Assurance Statement
A quality assurance project plan (QAPP) is not required for Tasks 1-3 of this project because they do not involve the generation, management, distribution, or use of primary environmental data that will be used or have the potential for use in environmental decision making.

Reporting and Deliverables
Progress Reports shall be submitted in accordance with the reporting requirements of the

contract. In addition, the contractor shall maintain contact with the WACOR to advise the WACOR of progress and problems. All documents shall be delivered in Word, Excel, HTML, and/or PDF format, as requested by the WACOR. The contractor shall notify the EPA immediately when expenditures of 75% and 90% of the work assignment LOE or funding (including pipeline costs) are reached.

Travel

This work assignment requires domestic travel to regional and/or state offices under this scope of work to support information collection activities. For purposes of costing, assume one person, for a duration of 3 days and 2 nights, for each of the reviews, and assume travel is to state capitals for region-led reviews. Additional local travel may be expected under this work assignment. All travel other than local travel shall be approved in advance by the project officer and shall be in accordance with the contract.

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.

QUALITY ASSURANCE SURVEILLANCE PLAN

The following performance measures will apply to work under this work assignment

Performance Requirement	Measurable Performance Standards	Surveillance Methods	Incentives/Disincentives
Management and Communications: During the performance of this work assignment, the Contractor shall immediately inform EPA of any issue that may potentially impact project schedules.	The Contractor shall maintain contact with the CL-COR and Work Assignment Contracting Officer's Representative throughout the performance of the contract and identify any issues or concerns to the appropriate EPA person prior to occurrence. In cases where issues have a direct impact on project schedules and cost, the contractor shall provide options for EPA's consideration on resolving or mitigating the impacts.	The CL-COR and Work Assignment Contracting Officer's Representative will allocate the time needed to discuss and address all issues identified by the Contractor. They will document and maintain a complete record of the issues, agreements and outcome. They will review monthly progress reports for indicators of communications problems and will bring issues to the Contractor's immediate attention.	Any issues that impact project schedules that are not brought to the attention of the appropriate CL-COR or Work Assignment Contracting Officer's Representative before occurrence will be unsatisfactory. Two or more incidents during this work assignment option period will be reported as unsatisfactory performance in the CPARS Evaluation 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 immediately inform EPA of any issue that may potentially impact project costs.	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, practice and encourage time management, and ensure accurate and appropriate time keeping.	The CL-COR will routinely meet with the Contractor's Project Manager to discuss the work progress, contract and individual work assignment level expenditures. The Project Officer shall review the Contractor's monthly progress reports and request the WACOR's verification of expenditures and technical progress before authorizing invoice payments. The WACOR will maintain regular contact with the Contractor's designated work assignment manager /project manager to discuss work assignment progress and expenditure. The WACOR will review the Contractor's monthly progress report and invoice and provide feedback to the Project Officer on payment.	Any issues that impact project costs should be brought to the attention of the CL-COR and Work Assignment Contracting Officer's Representative. An overrun that exceeds 4% of the total obligation that is the direct result of the Contractor's failure to manage and control cost will result in an unsatisfactory rating being reported to the CPARS Evaluation System.
Technical Analyses: The Contractor shall collect and analyze data in support of the Agency decision-making. The Contractor shall immediately inform EPA of any issue that may potentially impact the project.	The analyses conducted by the contractor shall be factual and defensible and based on sound science and engineering. All data shall be collected from reputable sources and quality assurance measures shall be conducted in accordance with agency requirements and any additional requirements outlined in individual work assignments. Any work requiring the contractor provided options or recommendations shall include the rationale use in selecting the option/recommendation and all other options considered.	The appropriate CL-COR and Work Assignment Contracting Officer's Representative will review all analyses conducted by the Contractor and will independently consider the merit. EPA may opt to peer review analyses to further validate merit.	All analyses conducted for EPA by the Contractor must be factual and based on sound science and engineering. If after reviewing the Contractor's analysis, EPA determines that the content is not factual, legally defensible or based on sound science and engineering, The Contractor=s performance will be reported as unsatisfactory in the CPARS Evaluation System.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-16

☐ Other ☒ Amendment Number: 000001

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2019 Base Option Period Number 2	Tech Support for NPDES & PQRs

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 03/13/2019 To 06/30/2019

Comments:
The purpose of this Amendment 1 is to remove Janita Aguirre as the previous WACOR; changes David Hair from the AWACOR to the WACOR; and adds Elizabeth Eddy as the new AWACOR (Phone: 202-564-4759, E-mail: eddy.elizabeth@epa.gov).

☐ 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 06/30/2019 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 David Hair (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-2287 FAX Number:	
Project Officer Name Jennifer Chan (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-3067 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 3/13/2019 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-16

☐ Other ☒ Amendment Number: 000002

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2021 Base Option Period Number 2	Tech Support for NPDES & PQRs

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 04/11/2019 To 06/30/2019

Comments:

☐ 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 06/30/2021 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 David Hair (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-2287 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) 4/11/2019 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

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

Title: Technical Support for NPDES Program and Permit Quality Reviews

Work Assignment Contracting Officer's Representative (WACOR):

David Hair	**USPS Mailing Address**	**Courier Address**
Phone: (202) 564-2287	Water Permits Division	EPA East Building
Fax (202) 564-9544	1200 Pennsylvania Ave., NW	1201 Constitution Ave., NW
hair.david@epa.gov	Mail Code 4203M	Room 7126
	Washington, DC 20460	Washington, DC 20004

Alternate Work Assignment Contracting Officer's Representative (AWACOR):

Elizabeth Eddy	**USPS Mailing Address**	**Courier Address**
Phone: (202) 564-4759	Water Permits Division	EPA East Building
Fax (202) 564-9544	1200 Pennsylvania Ave., NW	1201 Constitution Ave., NW
eddy.elizabeth@epa.gov	Mail Code 4203M	Room 7135G
	Washington, DC 20460	Washington, DC 20004

Period of Performance: April 11, 2019 through June 30, 2019

Level of Effort: EPA estimates that an additional 200 hours, in addition to the original 864 hours tasked in the base work assignment, will be required to support the activities outlined below for a total of 1064 LOE hours.

Background: An important component of a healthy National Pollutant Discharge Elimination System (NPDES) program is permit quality. Program and Permit Quality Reviews (PQRs) allow permitting authorities (during both issuance and oversight processes) to obtain information about the functioning of various aspects of the program and its potential to maintain and improve water quality.

This is particularly important as EPA works to achieve the goals of ensuring waters support designated uses or improving water segments and protecting streams from becoming impaired (maintaining uses). Permits that are written to meet these goals are critical in combination with other Clean Water Act water quality programs in achieving these objectives.

The NPDES program has used a variety of tools over the course of the last three decades to enhance program and permit quality. These methods have included reviews of draft permits using standard checklists, and PQRs. Reviews can be used to enhance specific programs or determine where additional guidance is needed. Most importantly, program and permit quality reviews can be used to improve the integrity of the program and will help EPA improve our ability to measure the success of the program.

Through this review mechanism, EPA promotes national consistency, identifies successes in implementation of the base NPDES program, as well as opportunities for improvement in the development of NPDES permits. The findings of the reviews may be used to identify areas for training or guidance and to identify or assist states in determining any needed action items to improve their NPDES programs.

Under this work assignment, EPA seeks support in updating draft methodology to allow EPA regions to manage the reviews, and assistance with conducting reviews of state programs and drafting reports outlining the results of the reviews. This scope of work includes implementation of permit quality reviews and results management.

Scope of Work:

This work assignment provides support to the Water Permits Division (WPD) to implement permitting oversight through a quality review process, as well as finalizing tools to ensure continual improvement of the NPDES permitting program. The Contractor shall provide technical support to EPA for the tasks described below. Support under the work assignment may require the Contractor to perform on a rapid response, quick turn-around basis.

Task 0: Kickoff Meeting

A kickoff meeting will be held to review the work statement and clarify the work to be performed. The contractor's work assignment manager and appropriate EPA staff and WACOR should attend. This meeting will be held by teleconference and may occur before the work plan is submitted to EPA.

Task 0 Deliverables: There are no deliverables associated with this task.

Task 1: Technical and Administrative Support for Implementing PQRs

The contractor shall support the implementation of:

- Up to eight (8) Region-led PQRs during the period of performance, some of which may have been partially conducted during the prior option period;
- One (1) headquarters-led PQR of Region-issued permits for facilities on tribal lands and U.S. territories;
- Final formatting and copy review of up to five (5) reports completed by EPA regional offices.

Implementation of these reviews include planning and coordination with EPA headquarters and EPA regional staff, and review of permits in accordance with existing SOPs, consisting of both a comprehensive program review and topic specific reviews. Task 1 should be supported by staff with at least 10 years of experience writing and/or reviewing NPDES permits; alternate experience may be substituted at the discretion of the EPA work assignment manager.

The tentative schedule for upcoming Region-led PQRs is as follows:

PQR No.	PQR Topic/Type	Schedule (tentative)
#1	Regional PQR (Region 5): Illinois	Spring 2018
#2	Regional PQR (Region 3): Delaware	Spring 2018
#3	Regional PQR (Region 8): South Dakota	Summer 2018
#4	Regional PQR (Region 1): Connecticut	Fall 2018
#5	Regional PQR (Region 3): Pennsylvania	Spring/Summer 2019
#6	Regional PQR (Region 7): Indiana	Spring/Summer 2019
#7	Regional PQR (Region 10): Alaska	Spring/Summer 2019
#8	Regional PQR (Region 8): North Dakota	Spring/Summer 2019

The contractor shall support EPA in implementing these reviews. This shall include the collection of permits and fact sheets from permitting authorities identified by regional staff, regulations, and policies, as appropriate. PQRs are conducted using the Standard Operating Procedures and tools currently posted on EPA's NPDES website: https://www.epa.gov/npdes/npdes-permit-quality-review-standard-operating-procedures

The contractor shall support WPD in conducting site visits for up to eight Region-led reviews. Each PQR will consist of approximately 10 permits from the states listed above. The details of the number of site visits and permits reviewed may be adjusted by the WACOR based on the unique characteristics of each state and region. Typically, contractor staff review no more than six permits per state.

The contractor shall review materials prior to any site visits, discuss preliminary review findings with EPA, and participate in site visits to regional and state offices. Site visits involve reviewing permit files and administrative records for core review permits, assisting EPA in interviewing permit writers and understanding the complete permit writing process within the State.

The headquarters-led review will require no travel or site visits. Desktop reviews of permits, fact sheets, and applications will be used for this review. In addition, some background research, primarily phone interviews and email communications with personnel in EPA's regional offices, will be required in order to obtain sufficient information to draft the background and process portions of the report.

The contractor shall develop a draft report providing a comprehensive summary of findings and recommendations from the core reviews following the site visits, including draft recommendations for improving quality of permits within specific regions and/or permitting authorities, using the report template developed by EPA (available with the SOP documents referenced above). Examples of complete reports can be found online at https://www.epa.gov/npdes/regional-and-state-npdes-pqr-reports. For reviews supported by the contractor, the contractor typically drafts the background sections and the Core Review Findings section, and the appropriately associated portions of the Action Items section. For headquarters-led PQRs, EPA may request additional permit reviews and drafting of report language for other sections of the report such as the national topic areas. On rare occasions, EPA may request the contractor perform similar additional reviews and develop report language for Region-led reviews.

The contractor shall edit and finalize reports after they have undergone reviews by EPA headquarters, regions and states. This includes assisting EPA in finalizing reports for regions previously conducted in addition to developing and finalizing reports for the upcoming reviews. This may include assistance with formatting drafts and using the Word template.

Task 1 Deliverables: The contractor shall provide draft reports 30 days after PQR site visit is completed. EPA will review draft reports and provide comments back to contractor within 30 days of receipt of draft report. The contractor shall provide the final draft report within 7 business days after receipt of EPA comments.

Task 2: Develop PQR Tools

The contractor shall assist in the development and/or updating of tools to support the FY18-22 PQR cycle. This may include formatting draft documents or editing existing documents to reflect process changes that will be implemented in the new cycle. This includes drafting new tools to assess national topic areas that are not part of the previous PQR cycle.

Task 2 should be supported by staff experienced in both writing and/or reviewing NPDES permits and developing standard evaluation tools. Additional support will be needed from staff with experience creating and formatting documents such as checklists, standard operating procedure manuals, and report templates in both Word and PDF formats. Ideally, one staff member supporting this task should have direct experience using existing PQR tools.

Task 2 Deliverables: The contractor shall provide draft tools/summaries within 10 business days after EPA WAM request for draft PQR tools through written technical directives. EPA will review draft documents and provide comments back to contractor within 30 days of receipt of draft documents. Final tools/summaries are due 7 business days from receipt of EPA comments. Final documents should be provided in both Word and PDF formats. Final PQR tools that will be posted online must be compliant with Section 508 of the Rehabilitation Act of 1973 (as amended) (29 USC § 794d).

Task 3: Regional Assistance

The contractor shall assist in the review of state materials, such as standard conditions and templates, as needed by EPA regions in conducting PQRs as outlined in Task 1, to ensure compliance with the Clean Water Act and appropriate NPDES regulations at 40 CFR part 122. Comments will be due 14 days from receipt of documents from EPA.

OTHER REQUIREMENTS

Quality Assurance Statement
A quality assurance project plan (QAPP) is not required for Tasks 1-3 of this project because they do not involve the generation, management, distribution, or use of primary environmental data that will be used or have the potential for use in environmental decision making.

Reporting and Deliverables
Progress Reports shall be submitted in accordance with the reporting requirements of the

contract. In addition, the contractor shall maintain contact with the WACOR to advise the WACOR of progress and problems. All documents shall be delivered in Word, Excel, HTML, and/or PDF format, as requested by the WACOR. The contractor shall notify the EPA immediately when expenditures of 75% and 90% of the work assignment LOE or funding (including pipeline costs) are reached.

Travel

This work assignment requires domestic travel to regional and/or state offices under this scope of work to support information collection activities. For purposes of costing, assume one person, for a duration of 3 days and 2 nights, for each of the reviews, and assume travel is to state capitals for region-led reviews. Additional local travel may be expected under this work assignment. All travel other than local travel shall be approved in advance by the project officer and shall be in accordance with the contract.

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.

QUALITY ASSURANCE SURVEILLANCE PLAN

The following performance measures will apply to work under this work assignment

Performance Requirement	Measurable Performance Standards	Surveillance Methods	Incentives/Disincentives
Management and Communications: During the performance of this work assignment, the Contractor shall immediately inform EPA of any issue that may potentially impact project schedules.	The Contractor shall maintain contact with the CL-COR and Work Assignment Contracting Officer's Representative throughout the performance of the contract and identify any issues or concerns to the appropriate EPA person prior to occurrence. In cases where issues have a direct impact on project schedules and cost, the contractor shall provide options for EPA's consideration on resolving or mitigating the impacts.	The CL-COR and Work Assignment Contracting Officer's Representative will allocate the time needed to discuss and address all issues identified by the Contractor. They will document and maintain a complete record of the issues, agreements and outcome. They will review monthly progress reports for indicators of communications problems and will bring issues to the Contractor's immediate attention.	Any issues that impact project schedules that are not brought to the attention of the appropriate CL-COR or Work Assignment Contracting Officer's Representative before occurrence will be unsatisfactory. Two or more incidents during this work assignment option period will be reported as unsatisfactory performance in the CPARS Evaluation 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 immediately inform EPA of any issue that may potentially impact project costs.	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, practice and encourage time management, and ensure accurate and appropriate time keeping.	The CL-COR will routinely meet with the Contractor's Project Manager to discuss the work progress, contract and individual work assignment level expenditures. The Project Officer shall review the Contractor's monthly progress reports and request the WACOR's verification of expenditures and technical progress before authorizing invoice payments. The WACOR will maintain regular contact with the Contractor's designated work assignment manager /project manager to discuss work assignment progress and expenditure. The WACOR will review the Contractor's monthly progress report and invoice and provide feedback to the Project Officer on payment.	Any issues that impact project costs should be brought to the attention of the CL-COR and Work Assignment Contracting Officer's Representative. An overrun that exceeds 4% of the total obligation that is the direct result of the Contractor's failure to manage and control cost will result in an unsatisfactory rating being reported to the CPARS Evaluation System.
Technical Analyses: The Contractor shall collect and analyze data in support of the Agency decision-making. The Contractor shall immediately inform EPA of any issue that may potentially impact the project.	The analyses conducted by the contractor shall be factual and defensible and based on sound science and engineering. All data shall be collected from reputable sources and quality assurance measures shall be conducted in accordance with agency requirements and any additional requirements outlined in individual work assignments. Any work requiring the contractor provided options or recommendations shall include the rationale use in selecting the option/recommendation and all other options considered.	The appropriate CL-COR and Work Assignment Contracting Officer's Representative will review all analyses conducted by the Contractor and will independently consider the merit. EPA may opt to peer review analyses to further validate merit.	All analyses conducted for EPA by the Contractor must be factual and based on sound science and engineering. If after reviewing the Contractor's analysis, EPA determines that the content is not factual, legally defensible or based on sound science and engineering, The Contractor=s performance will be reported as unsatisfactory in the CPARS Evaluation System.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-17

☐ Other ☐ Amendment Number:

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 2	Animal Ag, Aquaculture

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 07/01/2018 To 06/30/2019

Comments:
The contractor shall not commence work on this work assignment until 7/1/2018.

☐ 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 06/30/2021 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 Jennifer Molloy (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-1939 FAX Number:	
Project Officer Name Robin Danesi (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-1846 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 6/30/2018 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 2-17

Title: Technical Support for the Implementation of projects in NPDES areas of Animal Agriculture, Aquaculture, Resilience Tools, and Program Messaging (short title: NPDES Animal Ag, Aquaculture, Resilience & Messaging)

Work Assignment Contracting Officer's Representative	**Alternative Work Assignment Contracting Officer's Representative**	**Alternative Work Assignment Contracting Officer's Representative**
Jennifer Molloy (4203M) Water Permits Division Office of Wastewater Management U.S. Environmental Protection Agency Washington, D.C. 20460 (202)-564-1939	Hema Subramanian (4203M) Water Permits Division Office of Wastewater Management U.S. Environmental Protection Agency Washington, D.C. 20460 (202)-564-5041	Jackie Clark (4203M) Water Permits Division Office of Wastewater Management U.S. Environmental Protection Agency Washington, D.C. 20460 (202)-564-6582

Period of Performance: July 1, 2018 through June 30, 2019

Estimated Level of Effort: 1615 hours

Background Information: This work assignment covers four separate NPDES program areas plus administrative tasks.

Part I. Administration. This includes project management tasks. (Task 1)

Part II. Animal Agriculture. The NPDES Concentrated Animal Feeding Operation (CAFO) program currently implements measures to prevent and abate pollutant discharges from animal agriculture activities. EPA continues to refine an integrated animal agricultural strategy to improve the environmental performance of animal agriculture through both regulatory and non-regulatory initiatives. The strategy includes supporting State and EPA permitting programs, exploring solid science and technology-based options for more effective management of manure and other AFO pollutants, and harnessing partnerships to improve awareness and encourage voluntary adoption of more effective water quality measures. (Tasks 2-6)

Part III. Aquaculture. Within the general area of aquaculture, the NPDES program issues permits for a variety of systems that culture or husband marine and freshwater animals, and occasionally plants. These can include fish hatcheries, raceways, ponds or recirculating systems, floating or submersible net pans or cages and bag, rack or suspended shellfish culture, when these systems are or result in point source discharges of pollutants to water of the U.S.

Operations that produce 100,000 pounds annually of fish or shellfish are subject to the concentrated aquatic animal production (CAAP) effluent guidelines, but many smaller aquatic animal production facilities (AAPFs) that are point source discharges of pollutants to waters of the U.S. are also subject to NPDES permitting. (Tasks 7-8)

Part IV. Adaptation and Resilience Tools. The National Water Program strategy to develop adaptation and resilience tools for the NPDES program, originally drafted in 2014 and updated periodically, is a multi-faceted approach to ensure that the NPDES program has permit-related tools, data and other information for permit writers and permittees to address challenges associated with changes in precipitation and run-off, higher and lower base flows, drought, rising sea levels, storm surges, ambient water temperature and other related factors. (Task 9-10)

Part V. NPDES Messaging. The NPDES Messaging effort is compiling information to characterize the purpose and accomplishment of the program over 40 years, with emphasis on national successes in pollutant reduction as well as state and regional successes. (Task 11)

Scope of Work:

The administrative and technical tasks provided by the contractor under this work assignment shall support EPA's implementation of all areas noted above. The contractor will not be involved in Agency policy- or decision-making. More specific details concerning the tasks outlined below shall be provided to the contractor through written technical directives from the WACOR in accordance with the technical direction clause of the contract. Based on evolving program priorities, LOE among tasks in this work assignment may be reallocated during the Option Period, in consultation with the contractor.

PART I. ADMINISTRATION

Task 1. Project Management

The contractor shall provide the necessary oversight, management and cost controls to implement the tasks in this work assignment, including the development of monthly invoices with the necessary break-downs to track costs per task. The contractor shall have calls approximately bi-monthly with the WACOR in order to discuss ongoing and planned work, or as needed. The contractor shall update the QAPP developed in Option Period 0, WA 0-17 to incorporate new and revised tasks.

Deliverables and Schedule: Regular and ongoing communication. Monthly invoices. Updated QAPP. Other possible administrative tasks as outlined in the contract and those mutually agreed upon by WACOR and contractor.

PART II. ANIMAL AGRICULTURE

Task 2. Supporting State, Tribal and Regional Initiatives to Support Water Quality Initiatives Associated with Agricultural Operations

EPA seeks to provide support to State, Tribal and Regional CAFO programs in the form of contractor assistance to develop or supplement specific elements of the program to improve manure management or other initiatives associated with agricultural operations. The State, Tribal or Regional program can propose an array of projects as long as there is reasonable demonstration of sustainable environmental improvement. Projects may be improvements to the regulatory program; supplements to the regulatory program; or actions that will target improved management at facilities without permit coverage. Examples of potential projects include, but are not limited to: training technical service providers to develop NMPs; developing manure transfer programs; or developing robust technical standards. With fewer and fewer CAFOs obtaining NPDES permit coverage, projects that will provide water quality improvements for discharges at all types of operations are desirable. Examples of contractor assistance include, but are not restricted to: drafting permit, rule, code or guidance language; conducting data analyses or modeling; organizing and/or providing training on developing NMPs; conducting livestock operation inspections, water quality or soil sampling or other field investigations; setting up databases; compiling information; conducting engineering reviews of agricultural practices; or other task directly related to improving water quality-related activities at agricultural operations. LOE will vary depending on the types of service needed. The following are projects in process or adequately scoped out at the time this work assignment is being written. Other projects that fall within this scope of work may be initiated under this task during this Option Period.

Project 1. Confederated Tribe and Bands of the Yakama Nation with Region 10: Under prior work assignments, EPA worked with the Yakama Tribe to develop nutrient management program language that can be incorporated into Tribal Codes, as well as accessory information, including a draft implementation strategy. To continue this effort, the contractor will assist the Tribe and its advisors to refine and execute the implementation plan for the Tribe's Nutrient Management Program, including possible activities such as working with BLM, to incorporate nutrient management provisions into lease agreements; developing monitoring/verification mechanisms; providing some training/education for the Yakama Tribe to use in implementing the Nutrient Management Program.

Deliverables and Schedule: As this work is already in process, the contractor will continue to provide support to the Tribe as the Council works to codify the draft language, and refine and initiate implementation. The work shall proceed in consultation with the Tribe, Region 10 and the WACOR, and products and schedules may be adjusted as needed.

Project 2. Vermont DEC with Region 1: Phosphorus TMDL wasteload allocations for Lake Champlain have implications for dairy operations in the watershed, particularly in Vermont where required best management practices are required for all livestock operations. Dairy producers in Vermont are considering converting from confined to pasture-based operations. To support this decision-making, a consortium of partners is undertaking assessments of water quality, social and economic indicators. In consultation with the partners, the contractor will support the compilation and analysis (i.e., through modeling and/or other methods) of water quality-based indicators, i.e., implications for nutrient and/or pathogen delivery to surface

waters, with cattle on pasture versus in confined operations. Under this series of tasks, the contractor will quantify the economic costs and time frames needed to transition small dairy farms in Vermont from animal confinement to an economically viable pasture-based operation.

Task A: Prepare Methodology to conduct a compilation of existing economic information. Compile existing economic information for Vermont and relevant regional areas regarding the cost and financial impact of switching from confinement to pasture rotational grazing. Data collection will be prioritized as follows: Vermont, other Northeastern U.S. states, Midwestern states, and finally any states outside of the regions.

Deliverables and Schedule: This worked commenced and should have been completed under WA 1-17. If not already finalized by the beginning of this Option Period, the contractor shall submit the final methodology that addresses EPA's and partner comments on the draft methodology.

Task B: Compile and analyze available information to better understand the economic cost of lost production to a small size farm in the Lake Champlain area undergoing transition, anticipated long-term economic benefits and at what point in transition the economic shift occurs.

Task B.1 – Analyze available information compiled through Task A and conduct necessary statistical analyses. The data should be analyzed to provide information related to the following research questions:

- What data exist for VT farmers/farms in the Lake Champlain basin and statewide
    - Demographic (age, education, years farming, etc.)
    - physical (total size and acres in production)
    - cadastral (tax, value, etc.)
    - farm specific (heads of cows, crops grown, equipment, cropping system, fertilization and manure application rates, conservation practices?)
    - financial (farm sales, debt, history of conservation grants)
- What economic data exist for small dairy farms both nationally and in Vermont that have transitioned from an animal confinement system to a pastureland rotational grazing system
    - cadastral (tax, value, etc.)
    - financial (farm sales, debt, history of conservation grants)
    - timeframe and economic cost of lost production to a small size farm in Lake Champlain undergoing transition,
    - anticipated long-term economic benefits from undergoing the transition,
    - at what point in transition the economic shift occurs.
    - Transferability of studies elsewhere in the United states and analyze their value for answering economic questions specific to Vermont small dairy farms.

Task B.2 – If still considered by the work group to be the appropriate next step, compile and analyze survey data available from Jennifer Colby's (UVM Pasture Program Coordinator) 2011 Master's Thesis, and from a planned follow-up grass-based farm survey by the UVM Center for Sustainable Agriculture. Ms. Colby carried out a survey of

grass-based farmers in 2011 as part of her Master thesis. UVM Center for Sustainable Agriculture plans to undertake a follow-up survey of grass-based farms in late 2017/early 2018 to better understand the status of farms (including dairy farms) using managed rotational grazing systems. Information from both surveys (assuming the follow up survey is complete) will be provided to the Contractor for analysis. The data should be analyzed to provide information related to the following research questions:

- How do grass-based farms contribute to natural resource health?
- What are the financial ramifications of transition from confinement to pasture?
- What factors influence farm success?
- What factors influence farmer quality of life?
- What is the public value gained from an increase in grass-based farms?

Task B.3 – Assess data gaps. The contractor shall identify additional information necessary to better understand the economic cost of lost production to a small size farm in Lake Champlain undergoing transition, anticipated long-term economic benefits and at what point in transition the economic shift occurs.

Deliverables and Schedule: These tasks were planned to be initiated under WA 1-17. The contractor shall continue per the schedules in place at the beginning of the Option Period to complete tasks under B, per the methodology developed under A. Tasks under B may be modified per technical direction from the WACOR, as determined in consultation with the project partners. The contractor shall participate in periodic conference calls with the project partners to update them on progress.

Subsequent tasks have been outlined in a separate document, which has been provided to the contractor. Should resources allow, those tasks would be incorporated by reference into this work assignment. However, for purposes of work plan development the contractor shall only include estimates for the tasks outlined above.

Project 3. Shoshone Bannock Tribe with Region 10. This project will use the base information on tribal nutrient codes developed for the Yakama Tribe (Project 1) and adapt it for the Shoshone Bannock Tribe. Outcomes are similar, i.e., using Tribal Codes to improve nutrient management, though conditions and scenarios differ. To the extent possible, in order to maximize resources, work will be aligned with efforts under Projects 4 and 5 since outcomes and time lines are similar.

Deliverables and Schedule: This project was initiated under WA 1-17. Under this work assignment, draft code language and implementation measures will be developed, per specific input from the Tribe. The work shall proceed in consultation with the Tribe, Region 10 and the WACOR, and products and schedules may be adjusted as needed.

Project 4. Couer d'Alene Tribe with Region 10. This project will use the base information on tribal nutrient codes developed for the Yakama Tribe (Project 1) and adapt it for the Couer d'Alene Tribe. Outcomes are similar, i.e., using Tribal Codes to improve nutrient management, though conditions and scenarios differ. To the extent possible, in order to

maximize resources, work will be aligned with efforts under Projects 3 and 5 since outcomes and time lines are similar.

Deliverables and Schedule: The WACOR and Region 10 shall convene a kick-off meeting with the contractor, Tribal and EPA project partners to discuss issues specific to the Couer d'Alene tribal lands, specific objectives, priorities and approximate time frames for the project. Within 2 weeks of the kick-off meeting, the contractor will provide a draft outline and schedule for the work per that input. The work shall proceed in consultation with the Tribe, Region 10 and the WACOR, and products and schedules may be adjusted as needed.

Project 5. Nez Perce Tribe with Region 10. This project will use the base information on tribal nutrient codes developed for the Yakama Tribe (Project 1) and adapt it for the Nez Perce Tribe. Outcomes are similar, i.e., using Tribal Codes to improve nutrient management, though conditions and scenarios differ. To the extent possible, in order to maximize resources, work will be aligned with efforts under Projects 3 and 4 since outcomes and time lines are similar.

Deliverables and Schedule: The WACOR and Region 10 shall convene a kick-off meeting with the contractor, Tribal and EPA project partners to discuss issues specific to the Nez Perce tribal lands, specific objectives, priorities and approximate time frames for the project. Within 2 weeks of the kick-off meeting, the contractor will provide a draft outline and schedule for the work per that input. The work shall proceed in consultation with the Tribe, Region 10 and the WACOR, and products and schedules may be adjusted as needed.

Project 6. Oklahoma Department of Agriculture, Food and Forestry with Region 6. ODAFF received numerous NOIs under the 2017 Construction General Permit (CGP: OKR10F000) for dry litter poultry operations. ODAFF would like to develop an information flyer specific to their Licensing Program that explains CGP requirements for agriculture-related operations. The contractor will work with ODAFF and Region 6 CAFO and stormwater programs to ensure accuracy of the content of the flyer. The product will likely be a 1-page, possibly tri-fold design, flyer, but may be adapted to another format as the project evolves.

Deliverables and Schedule: This effort commenced, and may have been completed, under WA 1-17. If the product was not completed under WA 1-17, then the contractor shall finalize it per the schedule in place at the beginning of this Option Period. The final product shall be provided electronically, in whatever program format it has been developed, as well as in pdf format. The final product may be in color, with appropriate illustrative graphics. EPA does not expect printing expenses to be incurred under this task.

Project 7. New Mexico Environment Department with Region 6. NMED, though not authorized to administer the NPDES program, implements state programs to protect both surface waters and groundwater from animal feeding operations. The State would like to develop training materials, and possibly sessions, for state program staff on nutrient management planning and implementation. The training will likely include elements of nutrient management planning, including required elements of plans, what to look for when

reviewing a plan, and what to assess during inspections or site visits. In the interest of optimizing costs, the contractor, in consultation with the WACOR, Region and NMED should consider delivery of some materials and sessions electronically. However, EPA will consider in-person training, should it be determined to be a cost-effective way to deliver some elements of the training program. For the duration of this project, the contractor shall also consider how elements of this training program may be transferred or applied in other States and Regions.

Deliverables and Schedule: This effort was initiated under WA 1-17. The contractor will continue to work with NMED and EPA to implement the curriculum and schedule developed during the prior Option Period.

Task 3. Supporting Development of NPDES CAFO Permits issued by EPA

Preventing and eliminating EPA permit backlogs is a high priority for EPA. Though there are few EPA backlogged CAFO permits at this time, there may be elements of certain reissuance processes where contractor assistance would expedite finalization of a permit, including drafting of certain permit or fact sheet provisions, undertaking certain analyses such as biological evaluations for ESA consultation, developing record-keeping and reporting forms, or assisting with logistical aspects of response to comments. Tasks will be permit-specific, and will be identified as EPA Regions identify permits for which they could use assistance.

Deliverables and Schedule: As/if permits are identified, the WACOR will set up kick-off call(s) with the relevant Regional permitting staff. Specific tasks will be identified at that time. For purposes of work plan development, assume approximately 20 hours.

Task 4. Supporting Region 5 in Ohio Authorization Process

The state of Ohio is currently going through the formal authorization process of having the NPDES CAFO program and stormwater from agricultural operations transition from Ohio EPA to Ohio Department of Agriculture (ODA). This includes numerous reviews and cross-walks to assess ODA rules and program for conformance with the federal rules. It will also require public notice and comment, as well as the likelihood of public hearings. The contractor shall provide support to EPA Region 5 for certain aspects of this process, such as assessing ODA rules and program description for conformance with the e-reporting rule, compilation of public comments, drafting responses to comments, logistical support for public hearings, and other tasks associated with any U.S. EPA action on Ohio's request to transfer. The contractor will not be undertaking inherent government functions, e.g., determining whether or not Ohio regulations meet the federal requirements, but will provide support to EPA's determinations. The contractor will not be involved in all elements of the review, but will provide support as EPA determines that there is a need.

Deliverables and Schedule: When Region 5 indicates that there are specific tasks in need of contractor assistance, the WACOR will schedule a 3-way call with the contractor and Region 5 to discuss schedule and specific deliverables. Deliverables may evolve as the authorization process moves forward. The contractor will be expected to be responsive to quick turn-arounds

as well as longer term objectives. For purposes of work plan development, assume approximately 20 hours.

Task 5. Providing Support for Animal Ag Partnership Projects and Events

Under this task the contractor will provide logistical support for The Animal Ag Discussion Group and other ag partnerships. AADG is an informal group of animal agriculture stakeholders including representatives from the U.S. Department of Agriculture (USDA), all sectors of the animal feeding industry and their associations, academia, and states. The group convenes via meetings and calls, as well as on farms and at agricultural events around the country, to keep lines of communication open and develop a shared understanding of how to achieve viable agriculture and clean water. https://www.epa.gov/npdes/animal-feeding-operations-afos-animal-agriculture-industry-partnerships

The contractor will support efforts to organize the Fall 2018 AADG meeting (likely begun under WA 1-17). The contractor may also assist EPA Regional Coordinators in convening Regional partnership forums, as web-based or small in-person meetings. The contractor may: provide support for written materials such as meeting agendas or summaries, organize meeting venues or web conferencing; and other related tasks as communicated through technical direction by the WACOR. Should specific projects be identified by the group, the contractor may support certain aspects of developing or implementing tasks associated with those projects. Other ag partners and partnerships that may fall under this task include ACWA, States and Tribes, nutrient technology partners, and ag industry groups.

Deliverables and Schedule: Deliverables and schedules will be specified with technical direction and schedules developed with the contractor on a case-by-case basis. For purposes of work plan development, assume approximately 60 hours.

Task 6. Supporting Technology and Innovation Collaborative Activities

EPA collaborates with a range of agricultural stakeholders, including USDA, producers, integrators, industry trade associations, and environmental organizations, to identify and support innovative technologies and practices that can promote:

- Water quality and other environmental benefits
- Productive agriculture
- Enhanced manure management
- Beneficial recycling and reuse of manure
- Cost savings for producers

One example of such collaborative work is the Nutrient Recycling Challenge, which EPA launched in 2015 to accelerate development and use of technologies that can recover nitrogen and phosphorus from animal manure and generate value-added products. To build on the successes of the Challenge, EPA will continue to collaborate with technology developers and agricultural stakeholders to support development of new technologies and practices. Support may

include activities and events focused around technology evaluation, technology demonstrations, connecting technology developers to end-users, identifying funding sources, and general education and outreach.
Deliverables and Schedule: This task was established in WA 1-17. If efforts commenced under that work assignment, then the contractor shall continue those efforts as previously agreed upon with the WACOR. If work did not commence under WA 1-17, then efforts under this work assignment shall commence when the WACOR convenes kick-off call. For purposes of work plan development assume approximately 60 hours.

PART III. AQUACULTURE

Task 7. Characterizing Shellfish Production Systems

Historically, in-situ production systems of shellfish such as oysters and clams did not add food, nutrients, pesticides, pharmaceuticals or other materials that would result in the introduction of pollutants to waters of the U.S., and thus were not required to have NPDES permit coverage. However, in more recent years, some shellfish operations have begun utilizing pesticides or other substances, which can result in discharges of unutilized substances or residues that are considered pollutants. EPA has a poor understanding of how frequently, and under what circumstances, this is happening. Under this task the contractor will undertake an evaluation of shellfish production systems in U.S. waters to characterize the types of introduced materials/substances used in shellfish production, how wide-spread these practices may be, and any documented water quality effects.

Deliverables and Schedule: Work on this task was initiated (and may have been completed) under WA 1-17. If work was not completed under WA 1-17, then efforts shall continue per the outline and schedule in place at the beginning of this option period. The deliverable will describe shellfish production practices, and consider categories such as freshwater, marine; east coast, west coast; class of shellfish (oyster, clam, etc.); and other aspects of types of production systems that will aid EPA in making determinations about whether there are subsets of shellfish production systems that may be point source discharges of pollutants. The characterization will include an assessment of inputs to the various types of shellfish production systems that may result in point source discharges of pollutants to waters of the U.S. The assessment will include the necessary information to determine not just whether these systems are technically point sources, but also any data that may demonstrate if they are posing threats to water quality, e.g., nutrient enrichment, impacts to native benthos, etc. As this information unfolds EPA may focus the task in a particular area or direction for additional investigation or follow-up.

Task 8. Supporting Development of NPDES Aquaculture Permits issued by EPA

Preventing and eliminating EPA permit backlogs is a high priority for EPA, and there may be elements of certain reissuance processes where contractor assistance would expedite finalization of a permit. EPA may or may not initiate work under this task during the remainder of this Option Period, depending on EPA Regional permit issuance schedules. Tasks will be permit-specific, and will be identified as EPA Regions identify permits for which they could use assistance. Permits that fall into this category will most likely include the following:

a. EPA develops NPDES permits for off-shore aquaculture operations in federal waters. This process involves coordinated NEPA assessments with the Corps of Engineers and National Marine Fisheries Service, development of appropriate permit provisions per CWA §§ 402 and 403, fact sheet language, an administrative record, a biological evaluation per the Endangered Species Act, and response to comments. In the Gulf of Mexico, this also involves coordination with other federal agencies per the 2017 *MOU for Permitting Offshore Aquaculture Activities in Federal Waters of the Gulf of Mexico.* EPA Region 4 is currently developing permits for 2 proposed net pen/cage systems in the Gulf of Mexico, and EPA Region 9 is currently developing a permit for a proposed system off the coast of California. Under this task the contractor will provide targeted support to these permitting processes, for relevant tasks as determined by the Regional permit writers.

b. EPA develops NPDES permits for fish hatcheries on tribal lands and in unauthorized states. This process includes reasonable potential analysis, WQBEL development and other standard NPDES elements. Currently pending permits are mostly in Regions 1 (Massachusetts and New Hampshire) and 10 (Washington, Oregon and Alaska), though other permits may be identified during this Option Period. Under this task the contractor will provide targeted support to these permitting processes, for relevant tasks as determined by the Regional permit writers.

Deliverables and Schedule: As permits are identified, the WACOR will set up kick-off call(s) with the relevant Regional permitting staff. Specific tasks will be identified at that time. The contractor will support EPA Region 9 in development of the NPDES permit for Rose Canyon. The specific tasks include mixing zone analysis, and support for developing a biological opinion for ESA consultation. These tasks may or may not be invoked during this Option Period, depending on the pace of permit development. If not completed during this Option period, they will likely be continued in the work assignment for the next Option Period. The contractor may also assist Region 4 with discrete aspects of Gulf off-shore aquaculture permit issuance to be determined, and other Regions with discrete aspects of fish hatchery permit issuance. This task may be invoked to assist with additional efforts related to aquaculture permitting, if specific needs arise during the Option Period and adequate funds/LOE remain.

PART IV. ADAPTATION AND RESILIENCE TOOLS

Task 9. Developing a Permit Writer's Step-by-Step Decision and Instruction Guide for Estimating Critical Flow Statistics Using Available Tools

There are a number of new and refined tools, as well as a progression of methods, for estimating critical flow statistics, which is an important element of developing NPDES water quality based effluent limits (WQBELs). Tools and approaches include:

1. *SWToolbox*: computes statistics at individual stream gages.
2. *WREG*: uses output from *SWToolbox* for stream gages throughout a region to compute regression equations for estimation of statistics at ungaged locations.

3. *StreamStats*: provides already developed results from *SWToolbox* and *WREG*.

These tools provide powerful new ways to improve accuracy of estimated critical flows at streams throughout the U.S. However, for the typical permit writer, how to use the tools, as well as understanding which tool or combination of tools is most appropriate for given situations, will be facilitated by some practical guidance.

Under this task the contractor will develop user-friendly, relatively simple step-by-step guidance to inform decision-making, as well as how to use these tools. The guidance will not replace, nor be as detailed as, the relevant User Manuals. However, this guide will be customized for the scenarios encountered by NPDES permit writers and will guide them through the decision-making process, (*e.g., the discharge is five-miles downstream from a gage, though there are no tributaries, diversions or land-use changes in between; what should I do?*). The guide will also provide basic instructions on how to use the tools.

After the guide is finalized the contractor may be asked to assist with some simple roll-out activities, including participation in EPA-sponsored webinar(s) for state and regional NPDES programs on the use of the USGS tools presented in the guide.

Deliverables and Schedule: Work on this task was initiated (and may have been completed) under WA 1-17. If work was not completed under WA 1-17, then efforts shall continue per the outline and schedule in place at the beginning of this option period to finalize the permit guide on using USGS tools to derive critical flow statistics. Efforts include coordination with EPA Regional and/or State permit writers and USGS. For the purpose of work plan development, the contractor shall assume no travel and no contractor conferencing facilities, i.e., any training will be via EPA web conferencing services.

Task 10. Providing Thermal Tools Training and Support

The contractor shall support thermal permit reviews and training for EPA Regional programs. This may include thermal modeling or mixing zone assessments for state or EPA permits, training of State and/or EPA permit writers in the use of CORMIX or other models, or other aspects of developing thermal limits.

Deliverables and Schedule: This task was established in WA 1-17. If efforts commenced under that work assignment, then the contractor shall continue those efforts as previously agreed upon with the WACOR. If work did not commence under WA 1-17, then efforts under this work assignment shall commence when the WACOR initiates the effort. The WACOR will set up calls with specific Regions to kick-off specific projects, as EPA Regional needs are identified. Projects may be focused on development of one or more permit, or may be broader training on particular aspects of developing thermal limits. For the purpose of work plan development, the contractor shall assume no travel and no contractor conferencing facilities, i.e., any training will be via EPA web conferencing services. For purposes of work plan development assume 50 hours.

PART V. NPDES MESSAGING

Task 11. Finding and Compiling Relevant Information and Case Studies on the NPDES Program

The NPDES program is 4 decades old, and despite of the many advances and improvements in water quality during that time, quantifying water quality improvements and other outcomes resulting from the implementation of the NPDES program is challenging. In this task the contractor will help discover, compile and summarize information from a variety of sources to tell comprehensive 'big picture' environmental successes of the program, as well as more focused outcomes, such as state-specific case studies and sector specific improvements. This should include the successes of other implementers, such as POTW operators or stormwater managers, where the NPDES program may be an important driver, but should not overshadow important accomplishments of other entities. The complementary aspect of all efforts should be clear. In addition, Information that highlights the ongoing challenges, and hence the continued relevance of the program, should be another element. The contractor will work with ACWA and state programs, with EPA Regions and headquarters and their available data sets, and will also seek other ways to highlight and tell NPDES success stories, e.g., linking reductions in CSOs to fewer beach closures, as supported by data. As appropriate, NACWA and WEF may also be partners in the effort, as determined by EPA. The research should feed into 3 general formats: 1-page fact sheets that highlight certain elements of the NPDES program; state-focused success stories or case studies; an NPDES program Esri StoryMap that can cohesively discuss the general successes of the program, and will likely incorporate elements of the other two products. EPA should be able to derive clear and discrete talking points from the information compiled to use in talks and other forums. EPA may produce these products, or may use the contractor to produce them, but in either case the contractor is responsible for finding and analyzing the necessary information to produce these products. Final products should be useful to EPA and State NPDES programs, general and technical audiences, and should try to express successes in

terms that will be relevant to general audiences, such as human health, aquatic biota recovery, recreational uses, etc. Important ancillary benefits should also be considered, such as water and energy efficiency, greening urban environments and flood management. Other indicators, such as economy or jobs, may also be included where they can be documented and supported. Also consider the multiple roles States and EPA play in building local capacity, including funding, technical support and organizational/management development. All materials should be composed within the context of how permitting accomplishes these benefits and why the public should have confidence in the organizations carrying out the work. EPA anticipates that the scope and direction of this project will evolve as some ideas and directions prove to be fruitful and others do not.

Deliverables and Schedule: This task was initiated under WA 1-17 and shall continue per schedules and outlines developed during that option period. The WACOR will facilitate state involvement via ACWA, EPA Regions and other partners, and the contractor will undertake the necessary follow-up with individual state programs identified via ACWA and Regional outreach, or with other partners identified by the WACOR. The WACOR will facilitate involvement of all national program subject matter experts for exploration of specific program areas, and the contractor will undertake the necessary follow-up with those SMEs. The schedule and content areas will evolve based on areas in which data and case studies are discovered. The contractor and EPA will communicate regularly during this evolution.

Quality Assurance Statement:

Most of the tasks in this work assignment are being carried forward from the WA 1-17, Amendment #2, and are already included in the project QAPP, as applicable. New projects under Task 2 may include the analysis of existing data, but do not involve the generation of new data. Therefore, some simple QAPP elements will be required.

EPA requires that all environmental data used in decision making be supported by an approved Quality Assurance Project Plan (QAPP). The contractor shall submit the QAPP within 15 days of the submittal of the work plan, or agreement between the WACO and contractor on the relevant Task strategy, as relevant.

Other Requirements:

Reporting

Reports shall be submitted in accordance with the reporting requirements of the contract. In addition, the contractor shall maintain bi-weekly telephone contact with the EPA work assignment manager (WACOR) to provide updates on progress and problems. All documents shall be delivered in the word processing format compatible with EPA, HTML, and/or PDF format, as requested by the WACOR. The contractor shall notify the WACOR immediately when expenditures of 75% and 90% of the work assignment LOE or funding (including pipeline costs) are reached.

The contractor shall be prepared to submit for inspection copies of all work in progress any time

as requested by the WACOR. The contractor shall not release information or comments on works performed under this work assignment without the WACOR's prior written authorization. Wherever practicable, all written materials submitted to EPA must be doubled-sided and on recycled paper. All computer disks submitted to the WACOR shall be scanned for, and identified as free from viruses.

The contractor shall submit drafts and final products in hard copy as well as on CD in a format compatible with Water Permits Division hardware.

Travel

All non-local travel shall be authorized in advance by the EPA CL-COR and shall be in accordance with the contract. Travel for any single task should not exceed $1,000 unless trip has been pre-approved.

Information Collection

All collection of information and data shall be in accordance with the Office of Water Quality Management Plan and OMB requirements under the Paperwork Reduction Act.

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.

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-17

☐ 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 2	Animal Ag, Aquaculture

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 07/01/2018 To 06/30/2019

Comments:
Since there is no substantive change, EPA does not require an entire work plan. Only a revised cost estimate is required.

☐ 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 06/30/2021 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 Jennifer Molloy (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-1939 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 Tammy Adams (Signature) (Date)	Branch/Mail Code: Phone Number: 513-487-2030 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 2-17
Amendment 1

1. **TITLE:** Technical Support for the Implementation of projects in NPDES areas of Animal Agriculture, Aquaculture, Resilience Tools, and Program Messaging (short title: NPDES Animal Ag, Aquaculture, Resilience & Messaging)

2. **PERIOD OF PERFOREMANC:** July 1, 2018 through June 30, 2019

3. **EPA WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE:**

WACOR Name:	**USPS Mailing Address:**	**Courier Address:**
Jennifer Molloy **Phone:** 202-564-1939 **FAX:** 202-564-6392 molloy.jennifer@epa.gov	1200 Pennsylvania Avenue Washington DC 20460	1201 Constitution Avenue Washington DC 20004

4. **PURPOSE:**

The Purpose of Amendment 1 is to add additional hours and cost to provide support for a draft permit and fact sheet under Task 8 for the Region 1 Aquaculture General Permit in order to meet a new Agency interim deadline for public notice. There is no substantive change in the work, only an accelerated deadline for a product that would have been delivered during the next Option Period.

5. **DELIVERABLES REQUIRED AND SCHEDULE FOR COMPLETION OF TASKS:**

The target due dates for information needed for the draft permit and fact sheet are being adjusted to be delivered no later than June 30, 2019, to meet the Region's target to public notice their Aquaculture General Permit in early July 2019. Nothing else about deliverables is being modified.

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

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-20

☐ Other ☐ Amendment Number:

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 2	Natl Pretreatment Prgm Support

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 07/01/2018 To 06/30/2019

Comments:
The contractor shall not commence work on this work assignment until 7/1/2018.

☐ 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 06/30/2021 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 Kathryn Kazior (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-2696 FAX Number:	
Project Officer Name Robin Danesi (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-1846 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 6/30/2018 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 2-20

TITLE: National Pretreatment Program Support

WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):

Kathryn Kazior **WACOR** Phone: (202) 564-2696 Fax (202) 564-6431 Christopher.Rebecca@epa.gov	**USPS Mailing Address** Water Permits Division 1200 Pennsylvania Ave., NW Mail Code 4203M Washington, DC 20460	**Courier Address** EPA East Building 1201 Constitution Ave., NW Room 7329B Washington, DC 20004
Rebecca Christopher **Alternate WACOR** Phone: (202) 546-2444 Fax (202) 564-6431 Kazior.Kathryn@epa.gov		EPA East Building 1201 Constitution Ave., NW Room 7329E Washington, DC 20004
Jan Pickrel **Alternate WACOR,** **June to October 2018** Phone: (202) 564-7904 Fax: (202) 564-6431 Pickrel.Jan@epa.gov		EPA East Building 1201 Constitution Ave., NW Room 7329K Washington, DC 20004

PERIOD OF PERFORMANCE: July 1, 2018 through June 30, 2019

PURPOSE: The Water Permits Division (WPD) within the Office of Wastewater Management (OWM) is responsible for the development and implementation of the National Pretreatment Program, which is a component of the National Pollutant Discharge Elimination System (NPDES) program. This program and its regulations address requirements for and oversight of Publicly Owned Treatment Works (POTWs) and Industrial Users (IUs, who are non-domestic dischargers), as well State programs to oversee the POTWs and IUs. These regulations and programs require states and POTWs to develop local pretreatment programs to assess, manage, and regulate pollutants introduced into POTWs from IUs. The goals of such pretreatment programs include reducing the risk to human health and aquatic life resulting from the POTW wastewater (effluent) discharges and sludge disposal options by preventing the interference of the POTW treatment plant operations and pass through of pollutants, to improve opportunities to recycle, reclaim, and reuse municipal and industrial wastewaters and sludges, and to prohibit the introduction of pollutants which result in the presence of toxic gases, vapors, or fumes that may cause acute worker health and safety problems. To achieve these goals, OWM is committed to developing and updating guidance materials and instructional materials to communicate such

existing, new, and newly revised requirements to IUs, municipalities, states, and EPA Regions.

OBJECTIVE: This work assignment will provide a broad base of technical and administrative tools to support EPA's implementation of the Pretreatment Program Regulations (40 CFR 403). Contractor support shall provide resources needed to support EPA and its State partners in the development of outreach materials (e.g., guidance, fact sheets, case studies, briefings), support training opportunities (e.g., workshops and webinars), and support assessment of POTW and state strategies (using EPA checklists and models, and compiling data from EPA databases).

In addition, existing new regulations, standards, and policies have been issued or in the process of being developed, with which existing guidance materials and instructional materials need to be updated and communicated, or for which new outreach materials need to be developed.

TASKS:

Task 0 - Work Plan, Budget Development and Management

The contractor shall participate in a kickoff conference call with the WACOR within 30 days of the work assignment's effective date.

The contractor shall prepare a detailed work plan and budget for the accomplishment of the indicated tasks in accordance with the clause Work Assignments (EPAAR 1552.211-74). The work plan shall include a description of: (a) proposed staff; (b) an estimate of hours to be spent on each task by each staff person (prime and subcontractors); and (c) a list of deliverables, with due dates and schedule for deliverables. This task also includes monthly progress and financial reports which shall conform to the requirements particularized to the clause, F.3 MONTHLY PROGRESS REPORT (EPAAR 1552.210-72) (JUN 1996).

The contractor shall meet with the WACOR either in person or via telephone approximately three to four (3-4) hours per month to discuss work assignment planning issues. During this regular meeting, the contractor shall be prepared to discuss updates for tasks outlined below and the contractor shall provide a summary update for tasks via email before each meeting.

Task 1: Rule Revisions Follow-up Activities: Guidance Manual Update and Informational Brochure Development [3.4, 3.7, 3.8]

EPA revised the General Pretreatment Regulations at 40 CFR Part 403 twice in 2005 ("Streamlining", 70 FR 60135, October 14, 2005, and "CROMERR", 70 FR 59848-89, October 13, 2005), once in 2015 (NPDES Electronic Reporting Rule, 80 FR 64064-158, October 22, 2015), once in 2016 (Unconventional Oil and Gas Extraction Effluent Guidelines, 81 FR 41845-57, June 28, 2016), once in 2017 (Dental Effluent Guidelines, 82 FR 27154-78, June 14, 2017). Regulation revisions affecting the pretreatment program are also forecast to be finalized this performance period for NPDES (proposed "NPDES Applications and Program Updates Rule", 81 FR 31343-31374, May 18, 2016) and other media (e.g., "Hazardous Waste Pharmaceuticals", 80 FR 58014-92, September 25, 2015). Consequently, EPA continues to review existing guidance manuals and informational brochures and prioritize them for updating in order to

ensure consistency with current regulation and policy.

The Office of Wastewater Management (OWM), also, in support of effluent limitation development for both NPDES Permits and IU Control Mechanisms, works with other EPA Offices to communicate results of studies, the development of new analytical methods and the use of monitoring tools. For example, OWM may summarize the results of an Office of Water/ Office of Science and Technology (OST) industry sector "detailed study" conducted as part of the Effluent Guidelines Program into an informational brochure of approximately 5 pages in length to help permit writers or to improve potential permittees' understanding of their regulatory responsibilities or might compile a set of "Frequently Asked Questions" into a document for publication.

For this task, the contractor shall support EPA by:

- For all documents:
  - Participating in EPA workgroup conference calls, collecting and compiling written comments and verbal comments received during the conference calls.
- For documents selected for revision:
  - Reviewing the existing manuals and identifying provisions that have been the subject of regulation or policy change since publication;
  - Recommending draft text to incorporate new regulation and policy change into the draft manuals.
- For documents that have received comments:
  - Recommending text to address comments received within 2 weeks of receipt of comments;
  - Editing the draft documents to incorporate EPA's decision on the recommended ways to address received comments within 2 weeks of EPA direction;
  - Following receipt and incorporation of edits from EPA management review, the contractor shall process final document for publication and/or webposting.

<u>Subtask 1A. Guidance Manual Updates</u> [3.4, 3.8]: Document updates are currently in various stages of completion: some document updates are being drafted, some are in draft form and being reviewed by stakeholders and management, and some are being finalized after resolution of received comments. Documents #1 and #2 are companion documents and "over-arching" general programmatic documents, that may need additional edits as the other documents (further down on the list below) are updated and revised. For all documents, contractor shall provide technical editing services prior to web publication and conform to Agency web publication requirements. Per technical direction from WACOR, contractor shall assist EPA in comment resolution processes outlined below for each manual.

1. *Procedures Manual for EPA and States Reviewing a POTW Pretreatment Program Submission* ("Procedures Manual" update to October 1983 document) – WACOR has a draft final document into which stakeholder comments (EPA Regional staff and State

Coordinators) have been incorporated. EPA will provide electronic file to contractor. Contractor shall support EPA to identify needed revisions to this document, as needed, to ensure agreement with associated topics discussed in the documents below (particularly the Guidance Manual for POTW Pretreatment Program Development), as the documents below are updated and revised.

2. *Guidance Manual for POTW Pretreatment Program Development* ("Development Manual" update to October 1983 document) – WACOR is currently reviewing a draft document prepared under a different contract. EPA will provide electronic file to contractor. Contractor shall support EPA by revising document upon receiving comments from EPA, and shall support EPA in soliciting stakeholder comments (EPA Regional staff, State Coordinator, and POTWs/National Association of Clean Water Agencies). EPA expects to conduct comment solicitation in stages [e.g., first EPA followed by states and NACWA]. Contractor shall support EPA by indexing comments received and drafting responses to address the comments received, incorporating EPA approved revisions as necessary. Contractor shall support EPA in identifying corresponding topics in the Procedures Manual (#1, above) and drafting revised text to ensure agreement between these two companion documents.

3. *Guidance for Developing Control Authority Enforcement Response Plans* ("ERP Manual" update to September 1989 document) – EPA is currently reviewing a draft document prepared under a different contract. EPA will provide electronic file to contractor. Contractor shall support EPA by revising document upon receiving comments from EPA, and shall support EPA in soliciting stakeholder comments (EPA Regional staff, State Coordinator, and POTWs/National Association of Clean Water Agencies). EPA expects to conduct comment solicitation in stages [e.g., first EPA followed by states and NACWA]. Contractor shall support EPA by indexing comments received and drafting revised text to address the comments received, incorporating EPA approved revisions as necessary. Contractor shall support EPA in identifying corresponding topics in Manuals #1 and #2 (above) and drafting revised text to ensure agreement between these three documents.

4. *Industrial User Permitting Guidance Manual, Appendix I – Combined Wastestream Formula and Appendix J – Production-Based Standards* (Appendices were previously a standalone document entitled Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula, update to September 1985 document) – EPA is currently reviewing a draft document prepared under a different contract. EPA will provide electronic file to contractor. Contractor shall support EPA by revising document upon receiving comments from EPA, and shall support EPA in soliciting stakeholder comments (EPA Regional staff, State Coordinator, and POTWs/National Association of Clean Water Agencies). EPA expects to conduct comment solicitation in stages [e.g., first EPA followed by states and NACWA]. Contractor shall support EPA by indexing comments received and drafting revised text to address the comments received, incorporating EPA approved revisions as necessary. Contractor shall support EPA in identifying corresponding topics in Manuals #1 and #2 (above) and drafting revised text to ensure agreement between these three documents.

Subtask 1A Deliverables: Contractor shall recommend revisions to address comments within 2 weeks of receipt of comments from EPA and other stakeholders. Contractor shall revise final documents within 2 weeks of WACOR concurrence in suitable format for publication, and website posting.

Subtask 1B. Informational Brochures [3.4, 3.7, 3.8]: For items #1-3 below, documents are currently in various stages of completion: some document updates are being drafted, some are in draft form and being reviewed by stakeholders and management, and some are being finalized after resolution of received comments. Information from some of these documents will ultimately be incorporated into updates to the Guidance Manuals listed in Subtask 1A. For all documents, contractor shall provide technical editing services prior to web publication and conform to Agency web publication requirements. Per technical direction from WACOR, contractor shall assist EPA in comment resolution processes outlined below for each document.

1. *Streamlining Significant Non-Compliance (SNC) Factsheet* ("SNC Factsheet" based on 2005 regulation changes) – EPA is currently reviewing a draft document prepared under a different contract. EPA will provide electronic file to contractor. Contractor shall support EPA in soliciting stakeholder comments (EPA Regional staff only). Contractor shall support EPA by indexing comments received and drafting revised text to address the comments received, incorporating EPA approved revisions as necessary. Contractor shall support EPA by preparing document for finalization (technical editing, formatting, 508 compliance for webposting).

2. *Pretreatment Program pH Requirements for Industrial Users* ("pH FAQs") – EPA is currently reviewing a draft document prepared under a different contract. EPA will provide electronic file to contractor. Contractor shall support EPA in soliciting stakeholder comments (EPA Regional staff only). Contractor shall support EPA by indexing comments received and drafting revised text to address the comments received, incorporating EPA approved revisions as necessary. Contractor shall support EPA by preparing document for finalization (technical editing, formatting, 508 compliance for webposting).

Per technical direction from WACOR, the contractor shall also anticipate developing 1 informational brochures (e.g., "Frequently Asked Questions" [FAQs] format or case study reports), designed to help NPDES permit writers and Pretreatment Program Coordinators on a variety of topics pertinent to program implementation, typically by reformatting previously published materials (e.g., excerpting preamble language from a published regulation on a particular topic). Example subjects might include recent changes in the federal regulations, recent studies completed on particular industry sectors, policy issues or Frequently Asked Questions compilations for various topics.

Subtask 1B Deliverables: Draft document shall be completed within 30 days of technical direction. Upon receipt of comments from EPA, contractor shall submit revised draft-final version of document to EPA within 2 weeks of EPA comments. Contractor shall revise final documents within 2 weeks of WACOR concurrence in suitable format for publication, and website posting.

Task 2: EPA-Regional and State Technical Activities Support [3.1, 3.4, 3.7, 3.8, 3.9, 6.0, 6.1, 7.0, 9.0]

Subtask 2.A. Audits and Inspections [9.0]: The contractor shall support EPA in conducting on-site program reviews and more formal program "audits" or inspections of States and/or POTW Pretreatment programs [Pretreatment Compliance Audit or PCA, and Pretreatment Compliance Inspection or PCI, respectively]. Inspections shall include an assessment of the extent to which States, POTWs or industrial discharges to POTWs, are complying with requirements in approved Pretreatment Programs, POTW National Pollutant Discharges Elimination System (NPDES) Permits and IU permits, State and federal regulations. The contractor shall follow the procedures outlined in the EPA audit guidance manual, preparing forms and a narrative summary. See Control Authority Audit Checklist and Instructions (EPA #833/B-10-001, February 2010) http://www3.epa.gov/npdes/pubs/final_pca_checklist_and_instructions_%20feb2010.pdf and updates, and also Form 3560. Refer also to updated IU Inspection and Sampling Manual (EPA #831/B-17-001, January 2017, https://www.epa.gov/sites/production/files/2017-01/documents/iuinspect.pdf). For Pretreatment Compliance Inspections (PCIs), the same general procedures are followed. For both PCAs and PCIs, certain program elements (e.g., legal authority review, local limits development) may be identified by the EPA Regional coordinator per site for exclusion from the overall review.

Audits and Inspections shall be performed by credentialed staff that satisfy the following requirements:

- Inspector credentials as required by Contractor Credentials Guidance Memo (dated 31 May 2013), including, but not limited to, completion of mandatory inspector training requirements identified in EPA Order 3500.1
- Minimum 5 years' experience performing pretreatment audits and inspections of POTWs and industrial users, including:
    - Pretreatment program development and evaluation
    - Standards application (standard and specific prohibitions, categorical standards, local limits)
    - Local limits development

  If a team of two or more employees is conducting an audit or inspection, at least one member of the team should have a minimum of five years' experience performing pretreatment audits and inspections.
- Satisfactory knowledge and skills required in Table 2.2 of IU Inspection and Sampling Manual

EPA or the State will furnish the contractor with background documents (POTW permit and fact sheet, annual report, prior audit report) particular to each POTW Pretreatment Program, with which the contractor is expected to be familiar prior to the audit/inspection. Such familiarization is expected to take approximately 8 hours of collective staff time prior to each audit. The contractor shall not conduct any sampling or analysis of POTW or industrial user influent or effluent, nor statistical sampling.

The contractor shall support EPA Region 1 for an audit of the State of Vermont industrial pretreatment program, along with a review of the State Legal Authority. This audit should be complete by the end of FY18 (end of September 2018).

Per technical direction from WACOR, contractor shall support EPA in the following activities. The contractor shall estimate its manpower and cost requirements based upon the following projections.

- In Region 5, contractor shall estimate its manpower and cost requirements to have three staff members conduct a PCI for the Metropolitan Water Reclamation District of Greater Chicago with 10 IU inspections.
- Location unspecified: Pretreatment Compliance Audit of 5 small to medium POTW pretreatment programs (< 15 Significant Industrial Users (SIUs) to begin upon WACOR identification of locations.
- Location unspecified: Pretreatment Compliance Inspections of 5 small to medium POTW pretreatment programs (< 15 Significant Industrial Users (SIUs) to begin upon WACOR identification of locations.

Subtask 2A Deliverables: Draft audit/inspection report due within 30 days of conducting onsite activities. Draft report will be revised and finalized within 10 days of the WACOR providing comments to contractor.

Subtask 2B. Program reviews [3.1, 3.4]: Per technical direction from WACOR, the contractor shall support EPA's assistance to Regions in examining received State or POTW pretreatment reports, typically as a more in-depth analysis of a single programmatic element. Typical documents for review include "industrial waste inventories" (or "survey" identifying industrial pollutant sources to POTWs), local limits development packages, local ordinances (assessment of legal documents supporting local pretreatment program strategy), or annual POTW reports (submissions in compliance with 40 CFR 403.12(i)). Contractor is advised to calculate manpower and cost requirements based upon projections:

- 5 Local Limit Reviews
- 2 Sewer Use Ordinance and/or Enforcement Response Plans
- 20 Annual Reports
- 2 State-wide "industrial waste inventory"

No travel is required for these reviews.

Subtask 2B Deliverables: Draft program review summary, within 30 days of written technical direction to begin the effort. Draft reports will be revised and finalized within 10 days of the WACOR providing comments to contractor.

Subtask 2C. Meeting Support, Conferences, Training Events [3.9, 6.1]: The contractor shall support EPA in conducting training on pretreatment, industrial and municipal wastewater topics. General Meeting and Training Support shall include procuring conference space, compiling and updating already developed training materials or developing specialized training materials for a

particular program subject or area (e.g., ICIS data entry and using ECHO, dental regulation implementation, hazardous waste, anaerobic digesters), drafting proposed agenda following conference call with EPA, registering students for the training, compiling handout materials for students, presenting materials (as part of a team of EPA, state, and municipal representatives). Depending on the specific training event and topics, the bulk of the student handout materials may be provided electronically for download.

All training events are pending technical direction from WACOR. The contractor is advised to calculate its manpower and cost requirements based on training support expected for:

- 1 events of 2 day in July 2018 duration for approximately 100 municipal and state employees, coordinated with EPA Region 5 pretreatment staff, on general pretreatment program topics. Locations will be Indianapolis, IL. Agenda, materials and conference space have already been arranged.
- 1 event of 3-day duration in, at EPA-Headquarters, for approximately 30 personnel (i.e. National Pretreatment Meeting)
- 3 events of 2-day duration for approximately 100 municipal and state employees, coordinated with EPA Regional pretreatment staff, on general pretreatment program topics. Locations will be comparable to costs for a training in Chicago, IL.

When securing space for events, contractor shall give preference to no-cost local municipal or state or federal facilities for conference space before contracting with conference space for cost. Hotel "block of rooms" for participants shall only be needed to be reserved for the Regional and municipal/state event, and location will be communicated to contractor by EPA COR after consultation with applicable EPA Region staff.

Subtask 2C Deliverables: The contractor shall support EPA with development of agenda, presentation materials, and instructors. A draft agenda shall be finalized at least 30 days prior to each event. Draft presentation and training material shall be finalized within 15 days prior to each event. Agenda, presentations, training materials and compilation of student handouts shall be finalized 5 days prior to each event. Contractor shall finalize meeting notes and action items within 10 days following the event. Comments from EPA shall be incorporated within 5 days of EPA direction. Contractor shall develop event evaluations and finalize evaluation reports within 10 days following the event.

Subtask 2D. Webinar Support [6.0, 6.1]: The WACOR will identify 4 topics which the contractor shall develop (or convert an existing topic) into a training module format (typically Microsoft PowerPoint compatible), and provide webinar support. The Webinars have not been scheduled as of yet, and may be spaced equally throughout the period of performance. For planning purposes, the contractor shall assume that a webinar will be approximately 1.5 hours in length and may be 'attended' by up to 1000 connections and shall be archived and posted with access on the EPA website for future viewing.

Topics will be determined during scheduled conference calls with the WACOR within 30 days of work assignment issuance. Anticipated topic areas may include:

- Calculating Permit Limits for Industrial Users (Combined Wastestream Formula and Production-Based Standards)
- Legal authority and Enforcement Response Plans
- Reporting under 40 CFR 403.12(j) and (p)
- Data tools for Permit Writers and Permittees
- Hauled Waste and Anaerobic Digesters
- Industrial User Inspections

Subtask 2E Deliverables: The contractor shall be responsible for providing staff support for the following items:

- Assist EPA with setting up webinar date, identifying necessary equipment and making appropriate reservations for webinar.
- Assist EPA in Notifications/Advertisement of Webinar, including an announcement on EPA's webpage. Announcements shall be broadcast at least 30 days prior to event.
- Assist in setting up and managing enrollment for the webinar using the appropriate designated EPA platform (e.g., Adobe Connect), support for managing registration of participants and providing webinar logistics.
- Work with EPA to finalize slides and other training materials (limited support required). Agenda, presentations, and training materials shall be finalized 5 days prior to each event.
- Develop and distribute certificates of participation to attendees.
- Develop event evaluations and finalize evaluation reports within 5 days following the event.
- Assist EPA to arrange for recording and archiving of the webinar on an EPA webpage within 5 days of event.

Task 3: EPA National Program Implementation Support [3.1, 3.4, 3.7, 6.0, 7.0]

The contractor shall provide general program support for a variety of technical and administrative activities.

Subtask 3A. Oversight Activities [3.1]: EPA has developed permit quality checklists for use in assessing NPDES permits issued to POTWs and IU permits. EPA checklists and assessment guidance are currently being developed in a separate work assignment. EPA will focus on indirect dischargers in the food processing sector both in cities with and without pretreatment programs. EPA has developed a draft checklist and guidance for this review process.

For states where EPA is the Pretreatment Program Approval Authority, following technical direction, the contractor shall draft Pretreatment PQR reports that characterize the results of the permit assessment (e.g., identifying action items to return permits to compliance with regulatory requirements and policy, deficiencies in documentation, etc.) using a format provided by the WACOR, report on compliance activity status (typically obtained from EPA Integrated Compliance Information System database (ICIS-NPDES).

Permit Quality Reviews in progress or anticipated for FY18-19 include:

1. Illinois
2. Delaware

Contractor shall anticipate conducting a total of 3 1 PQRs. Work shall not begin until technical direction from WACOR.

Subtask 3A Deliverables: Draft Pretreatment PQR report shall be completed within 30 days of technical direction. The contractor shall edit the draft documents to incorporate EPA's comments within 2 weeks of receipt of EPA's comments.

Subtask 3B. Data Management [3.1, 3.4]. EPA issued the NPDES Electronic Reporting Rule on October 22, 2015 http://www2.epa.gov/compliance/final-national-pollutant-discharge-elimination-system-npdes-electronic-reporting-rule.

- Electronic Reporting by POTWs of annual pretreatment program reporting is required in accordance with Phase II of the rule, i.e., 2020.
- Electronic Reporting by Industrial Users for which States and EPA are the Control Authority is required in accordance with Phase II of the rule, i.e., 2020.

WACOR and WPD Pretreatment Team are members of the Agency workgroup to support development of forms and guidance for implementation of this rulemaking.

The first step in receiving reports electronically requires entry of "facility level data", permit limits information, and other system required elements into ICIS-NPDES. Generally speaking, this may be supported by uploading of data from spreadsheets.

1. Per technical direction from WACOR, contractor shall support EPA to update facility level data [input data into spreadsheets provided by WACOR] for Industrial Users with either the EPA or State(s) are the Control Authority.
2. Per technical direction from WACOR, contractor shall support EPA in updating, as necessary, existing ICIS-NPDES pretreatment data entry guidance, as forms may have changed with the promulgation of the subject rulemaking.

Contractor shall assume 5 IU Facility Level spreadsheets for purposes of estimating cost and manpower.

Subtask 3B Deliverables:

1. Contractor shall provide updated spreadsheets of IU facility level data within 30 days of assignment.
2. Contractor shall provide edits to the Draft Revised Data Entry Guidance due within 2 weeks after issue has been identified.

Subtask 3C. Support EPA communications and outreach [3.7, 6.0, 7.0]: Per technical direction from WACOR, contractor shall:

1. Attend and summarize discussions from conference calls with EPA Regional Pretreatment Coordinators (typically monthly) and conference calls with State Pretreatment Coordinators (typically held every other month). Contractor shall add metadata to call summaries when posting to SharePoint.
2. Summarize or index significant discussions (including from Listserve) when identified by EPA. Contractor shall assume 4 listserv summarizations for purposes of estimating cost and manpower.
3. Assist EPA with enhancements and maintenance of EPA Pretreatment Program share sites, including support of uploading documents to Pretreatment Program SharePoint sites;
4. Support EPA with Pretreatment public website enhancements and maintenance.

Subtask 3C Deliverables:

1. Draft conference call summaries within five working days of the call date.
2. Listserv summaries within five working days of technical direction from EPA.
3. Posting of documents to share sites within five working days of identification.
4. Website edits within five working days of technical direction from EPA.

QUALITY ASSURANCE STATEMENT

QA Statement: EPA requires an approved QAPP whenever tasks involve the generation, distribution or use of environmental data which will be used, or has the potential for being used, in environmental decision making. Environmental data is information that describes environmental processes, locations or conditions, and health effects or consequences. It can be collected directly from measurements (primary data), produced from models, or compiled from other sources (existing or secondary data). Tasks included above do not involve collecting, assessing, or calculations using environmental data. A Work Assignment level QAPP is not necessary.

OTHER REQUIREMENTS

Software Applications and Accessibility

Word processing files delivered to the Government shall be Microsoft Word, 8.0 or higher. All software and electronic information technology shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Files that are available on the website will be delivered to the contractor. Web-based intranet and internet information and applications. See: http://www.section508.gov.

- Preferred text format: MS Word, 8.0 or higher (MS Office 2007 or higher)
- Preferred presentation format: Power Point, Office 2007 or higher
- Preferred graphics format: Each graphic is an individual graphic file (.bmp, .gif, .jpeg, .tif, .png files preferred – contractor shall deliver full-sized images or vector-based graphics unless otherwise requested.)

- Preferred portable format: Adobe Acrobat, Version 6.0

Reporting

Progress reports shall be submitted in accordance with the reporting requirements of the contract. In addition, the contractor shall maintain contact with the WACOR to advise of progress and problems. All documents shall be delivered in Word, Excel, HTML, and/or PDF format, as requested by the WACOR. The contractor shall notify the WACOR immediately when expenditures of 75% and 90% of the work assignment LOE or funding (including pipeline costs) are reached.

The contractor shall be prepared to submit for inspection copies of all work in progress any time as requested by the WACOR. The contractor shall not release information or comments on works performed under this work assignment without the WACOR's prior written authorization. Wherever practicable, all written materials submitted to EPA must be doubled-sided and on recycled paper. All computer disks submitted to the WACOR shall be scanned for, and identified as free from viruses.

Travel

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. Travel is expected to occur for specifically Task 2.

Information Collection

All collection of information and data shall be in accordance with the Office of Water Quality Management Plan and OMB requirements under the Paperwork Reduction Act.

Meetings, Conferences, Training Events, Award Ceremonies and Receptions

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, shall be obtained by the CL-COR as needed and provided to the Contracting Officer. Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the CL-COR.

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 internal approval 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.

Table: Deliverables Schedule		
Task	**Deliverables Summary**	**Due Date**
Task 1.A: Guidance Manual Updates	1. Recommend text to address comments received 2. Finalize draft documents for publication and webposting	1. Within 2 weeks of receipt of comments from EPA 2. Within 2 weeks of EPA direction
Task 1.B: informational brochures or FAQs	1. Draft Fact Sheet 2. Revisions to Fact Sheet 3. Finalize draft documents for publication and webposting	1. Within 30 days of receipt of information from WACOR 2. Within 2 weeks of EPA comments 3. Within 2 weeks of EPA direction
Task 2.A: Audits and Inspections	1. Draft Audit and/or Inspection Report 2. Final Audit and/or Inspection Report	1. Draft reports due within 30 days of conducting onsite activities. 2. [Draft] final reports will be revised and finalized within 10 days of WACOR providing comments to contractor
Task 2.B: Program Reviews	1. Draft Program Review Report 2. Final Program Review Report	
Task 2.C: General Meeting and Training Support	1. Draft agenda 2. Draft presentation and training material 3. Final agenda, presentations and training materials 4. Draft meeting notes 5. Finalize meeting notes 6. Summary of conference evaluations	1. At least 30 days prior to event 2. At least 15 days prior to event 3. At least 5 days prior to event 4. Within 10 days following event 5. Within 5 days of EPA direction 6. Within 10 days following event
Task 2.D: Webinars	1. Announcement of webinar 2. Finalize agenda, presentations and training material 3. Summarize evaluations 4. Archiving and posting webinar	1. At least 30 days prior to event 2. At least 5 days prior to event 3. Within 5 days of event 4. Within 5 days of event

Task 3A: Continued Oversight Activities	1. Draft PQR Report 2. Edits of draft PQR Report	1. Within 30 days of technical direction 2. Within 2 weeks of receipt of EPA comments
Task 3B: Data Management Strategy	1. Updated spreadsheets 2. Edits to Draft Revised Data Entry Guidance.	1. Within 30 days of receipt of materials from EPA 2. Edits submitted within 2 weeks of EPA direction
Task 3C: EPA communications and outreach	1. Conference call summaries 2. Listserv summaries 3. Revised/posting of documents on SharePoint or EPA website	1. Within 5 working days of call date 2. Within 5 working days of technical direction 3. Within 5 working days of technical direction

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-20

☐ Other ☒ Amendment Number: 000001

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2019 Base Option Period Number 2	Natl Pretreatment Prgm Support

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 10/16/2018 To 06/30/2019

Comments:
The purpose of this Amendment 1 is to REMOVE Kathryn Kazior as the WACOR and to CHANGE Rebecca Christopher from an AWACOR to the WACOR. In addition, Jan Pickrel shall remain the AWACOR until this work assignment is completed.

☐ 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 06/30/2019 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 Rebecca Christopher (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-2444 FAX Number:	
Project Officer Name Jennifer Chan (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-3067 FAX Number:	
Other Agency Official Name (Signature) (Date)	Branch/Mail Code: Phone Number: FAX Number:	
Contracting Official Name Brad Heath (Signature) 10/16/2018 (Date)	Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:	

EPA

United States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number: 2-20

☐ Other ☒ Amendment Number: 000002

Contract Number	Contract Period	Title of Work Assignment/SF Site Name
EP-C-16-003	07/01/2016 To 06/30/2021 Base Option Period Number 2	Natl Pretreatment Prgm Support

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 10/16/2018 To 06/30/2019

Comments:
Since there is no substantive change, EPA does not require an entire work plan. Only a revised cost estimate is required.

☐ 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 06/30/2021 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 Rebecca Christopher (Signature) (Date)	Branch/Mail Code: Phone Number: 202-564-2444 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 Tammy Adams (Signature) (Date)	Branch/Mail Code: Phone Number: 513-487-2030 FAX Number:	

PERFORMANCE WORK STATEMENT
CONTRACT EP-C-16-003
WORK ASSIGNMENT 2-20
AMENDMENT 2

TITLE: National Pretreatment Program Support

WORK ASSIGNMENT CONTRACTING OFFICER'S REPRESENTATIVE (WACOR):

	USPS Mailing Address	
Rebecca Christopher **WACOR** Phone: (202) 546-2444 Fax (202) 564-6431 Christopher.Rebecca@epa.gov	Water Permits Division 1200 Pennsylvania Ave., NW Mail Code 4203M Washington, DC 20460	EPA East Building 1201 Constitution Ave., NW Room 7329E Washington, DC 20004
Jan Pickrel **Alternate WACOR** Phone: (202) 564-7904 Fax: (202) 564-6431 Pickrel.Jan@epa.gov		EPA East Building 1201 Constitution Ave., NW Room 7329K Washington, DC 20004

PERIOD OF PERFORMANCE: Issuance through June 30, 2019

PURPOSE: The Water Permits Division (WPD) within the Office of Wastewater Management (OWM) is responsible for the development and implementation of the National Pretreatment Program, which is a component of the National Pollutant Discharge Elimination System (NPDES) program. This program and its regulations address requirements for and oversight of Publicly Owned Treatment Works (POTWs) and Industrial Users (IUs, who are non-domestic dischargers), as well State programs to oversee the POTWs and IUs. These regulations and programs require states and POTWs to develop local pretreatment programs to assess, manage, and regulate pollutants introduced into POTWs from IUs. The goals of such pretreatment programs include reducing the risk to human health and aquatic life resulting from the POTW wastewater (effluent) discharges and sludge disposal options by preventing the interference of the POTW treatment plant operations and pass through of pollutants, to improve opportunities to recycle, reclaim, and reuse municipal and industrial wastewaters and sludges, and to prohibit the introduction of pollutants which result in the presence of toxic gases, vapors, or fumes that may cause acute worker health and safety problems. To achieve these goals, OWM is committed to developing and updating guidance materials and instructional materials to communicate such existing, new, and newly revised requirements to IUs, municipalities, states, and EPA Regions.

Subtask 2A is amended to read as follows:

The contractor shall support EPA in the following activities. The contractor shall estimate its manpower and cost requirements based upon the following projections.

- In Region 5, contractor shall estimate its manpower and cost requirements to have three staff members conduct a PCI for the Metropolitan Water Reclamation District of Greater Chicago with 10 IU inspections.
- Location unspecified: Pretreatment Compliance Audits or inspections of approximately 5-8 small to medium POTW pretreatment programs (< 15 Significant Industrial Users (SIUs) to begin upon EPA WACOR identification of locations.
- Location unspecified: Pretreatment Compliance Inspections of approximately 5-8 small to medium POTW pretreatment programs (< 15 Significant Industrial Users (SIUs) to begin upon EPA WACOR identification of locations.