



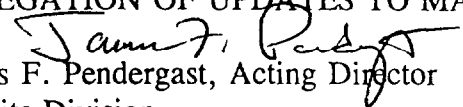
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C.

**Permits Division**  
**Office of Wastewater Management**  
**Office of Water**

FEB 6 1995

MEMORANDUM

SUBJECT: DELEGATION OF UPDATES TO MAJOR/MINOR LISTS

FROM:   
James F. Pendergast, Acting Director  
Permits Division

TO: Regional Water Management Division Directors

At our last conference call with Regional Permits Branch Chiefs, we agreed that determination of major/minor status for both municipal and non-municipal NPDES dischargers should be delegated to the Regions. This memo is to establish that delegation, effective February 28, 1995, and to provide guidelines for implementation.

Updates of major/minor status should be carried out in accordance with the following criteria.

1. No facility that appears on a current Quarterly Non-Compliance Report (QNCR) may be downgraded from a major to a minor until the non-compliance is resolved.
2. Municipal facility status may be updated based on the definition of a municipal major as one that has a design flow of 1 MGD or greater or a service population of 10,000 or greater.
3. Non-municipal facilities status should be determined using the rating system specified on the NPDES Permit Rating Work Sheet which was issued along with an instruction document on June 27, 1990, in a memo from James E. Elder titled, "New Non-Municipal Rating System". This system includes the following factors: (1) toxic pollutant potential, (2) flow/stream volume, (3) conventional pollutants, (4) public health impact, (5) water quality factors, and (6) proximity to near coastal waters.
4. The NPDES Permit Rating Work Sheet and its instructions also describe the process for establishing discretionary majors. Please note that each Region is limited to a certain number of discretionary majors, which is the greater of 50 or 10% of the actual majors plus 40.

Once an update determination has been completed, the appropriate information for entering the change in PCS should be sent to Carol Galloway, Chief, Data Management Branch, Office of Compliance 2222A. Because extensive modification to the system would be required for Regional data entry of these changes, it is currently more cost effective for the Headquarters Data Management Branch to continue this PCS entry. However, this issue may be raised to the PCS Steering Committee for consideration.

If you have any questions concerning this process, please call me or contact Elaine Brenner at (202) 260-4933.

cc: Regional Permit and Compliance Branch Chiefs