



Section VI Review
Primacy and Authorization, Enforcement, Permits, Guidance and Policy

The first group to correctly provide the questions for all the answers below wins!

1. The most effective means to achieve compliance from willing operators. _____
2. The statute that establishes procedures for the primacy and permitting processes. _____
3. A principle that mandates or constrains action. _____
4. Issues permits in non-primacy States. _____
5. It represents EPA in court. _____
6. It documents permitting decisions. _____
7. It provides more detail on implementing regulations. _____
8. Enforcement actions issued by the regulating agency. _____
9. Ensures national consistency and minimum standards while providing flexibility to the States to administer approved programs. _____
10. Compliance with the permit is considered compliance with the regulations for enforcement purposes. _____
11. Three factors for determining the size of a penalty. _____
12. They are eligible for primacy or authorization, in addition to the 50 States. _____
13. EPA-administered permit programs under SDWA and the CWA. _____
14. Contains the procedural regulations for issuing permits. _____
15. Besides EPA and primacy or authorized States, the other party allowed to initiate enforcement actions in court. _____

Section VI Jeopardy Review
Primacy and Authorization, Enforcement, Permits, Guidance and Policy
Answer Sheet

The first group to correctly provide the questions for all the answers below wins!

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| 1. The most effective means to achieve compliance from willing operators. | What are informal enforcement actions?
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| 2. The statute that establishes procedures for the primacy and permitting processes. | What is the Administrative Procedure Act?
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| 3. A principle that mandates or constrains action. | What is a policy?
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| 4. It issues permits in non-primacy States. | What does EPA do?
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| 5. It represents EPA in court. | What is the Department of Justice?
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| 6. It documents permitting decisions. | What is the administrative record?
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| 7. It provides more detail on implementing regulations. | What is guidance?
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| 8. Enforcement orders issued by the regulating agency. | What are administrative orders?
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| 9. Ensures national consistency and minimum standards while providing flexibility to the States to administer approved programs. | What does primacy or authorization do?
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| 10. Compliance with the permit is considered compliance with the regulations for enforcement purposes. | What is permit-as-a-shield?
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| 11. Three factors for determining the size of a penalty. | What are deterrence, eliminating economic advantage, national consistency, and logical calculation?
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| 12. They are eligible for primacy or authorization, in addition to the 50 States. | What are Tribes, the District of Columbia, Puerto Rico, Guam, the Virgin Islands, the Northern Mariana Islands, American Samoa and the Former Trust Territories of the Pacific?
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| 13. EPA-administered permit programs under SDWA and the CWA. | What are the Underground Injection Control and National Pollutant Discharge Elimination System permit programs?
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| 14. Contains the procedural regulations for issuing permits. | What is in 40 CFR Part 124?
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| 15. Besides EPA and primacy or authorized States, the other party allowed to initiate enforcement actions in court. | Who are citizens?
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