

**COMMONWEALTH OF VIRGINIA
DEPARTMENT OF HEALTH
OFFICE OF DRINKING WATER**

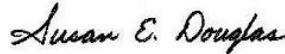
Date: June 1, 2016

To: Office of Drinking Water Staff

Through: Drew Hammond, PE, Deputy Director
Office of Drinking Water



From: Susan E. Douglas, PE, Director
Division of Technical Services



Subject: **Working Memo 878, Amendment #3**
ADMINISTRATION – CONTACTS OUTSIDE ODW – Coordination with Virginia
Department of Environmental Quality

Summary:

This memo describes the process for coordination of permits and programs between the Virginia Department of Health (VDH) and the Virginia Department of Environmental Quality (DEQ) that affect waterworks.

This working memo replaces Working Memo 878, Amendment #2 dated May 6, 2015.

Electronic Copy:

An electronic copy of this working memo in PDF format is available for staff internally at the following location: <\\odwsrv1\odwshare\03-Memos\301-Active Working Memos\301.01-pdf Active Memos>.

An electronic copy of the working memo attachments is available for staff internally at the following location: <\\odwsrv1\odwshare\03-Memos\301-Active Working Memos\301.02-Forms Letters Manuals\WM878 - Coordination with Virginia Dept of Environmental Quality>.

Contact Information:

Please contact Susan E. Douglas, PE, Office of Drinking Water, at (804) 698-7490 or Susan.Douglas@vdh.virginia.gov, with any questions regarding the application of this working memo.

Disclaimer:

This document is provided as guidance and, as such, sets forth standard operating procedures for the Office of Drinking Water. However, it does not mandate or prohibit a particular action not otherwise required or prohibited by law. If alternative proposals are made, such proposals will be reviewed and accepted or denied based upon their technical adequacy and compliance with appropriate laws and regulations.

Summary of Revisions:

- DEQ’s Water Division reorganized into 2 divisions: Water Permitting and Water Planning.
- DEQ will send all individual VWP applications and draft GW permits (except Existing User Permits) to ODW for review through a central email account: odwreview@vdh.virginia.gov.
- DEQ will send all final VWP and GW permits to ODW through a central email account: odwreview@vdh.virginia.gov.
- VWP and GW permits and associated documents will be saved at [\\odwsrv1\odwshare\08-Documents and Data Files](#) and Field Office Directors will be notified of their availability.
- DEQ will notify ODW of all pre-application meetings related to VWP and GW Permits for public water supplies; attendance by ODW field staff is strongly encouraged.
- ODW will notify DEQ permit staff of preliminary engineering conferences and well site inspections that involve new or modified surface water withdrawal structures or groundwater wells in GWMA’s.

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1. VPDES and VPA Permit Review Response Memorandum
2. VWP Permit Review Response Memorandum
3. Draft GW Permit Review Form
4. Draft GW Permit Response Memorandum

1. DEQ WATER PERMITTING AND WATER PLANNING DIVISIONS - PERMITS

DEQ administers federal Clean Water Act programs and state programs, which affect both surface water and groundwater resources in Virginia. This is accomplished primarily by the issuance of permits, including:

- Virginia Pollutant Discharge Elimination System (VPDES) – individual permits and general permits
- Virginia Pollution Abatement (VPA) – individual permits and general permits
- Virginia Water Protection (VWP) permits, including Surface Water Withdrawals
- Groundwater Withdrawal (GW) permits

1.1 VPDES Permits

The federal National Pollutant Discharge Elimination System (NPDES) permit program has been delegated to DEQ, who administers it as the VPDES permit program under 9VAC25-31 (individual discharge permits) and 9VAC25-860 (general potable water treatment plant discharge permits). VPDES Permits are issued for point source discharges of pollutants to surface waters. Most point discharges from conventional water treatment plants are regulated by a General VPDES Permit.

1.2 VPA Permits

VPA Permits are administered under 9VAC25-32 and regulate pollutant management activities that are not point source discharges but have the potential to affect state waters, both groundwater and surface water.

1.3 VPDES and VPA Permits with Water Reclamation and Reuse

Reclamation and reuse of wastewater, including domestic, municipal and industrial wastewater, is regulated by DEQ under the Water Reclamation and Reuse Regulation, 9VAC25-740. DEQ implements the requirements of the regulation through its existing VPDES and VPA permit programs.

1.4 VWP Permits

VWP Permits regulate impacts to state waters, including surface water withdrawals. These are administered under 9VAC25-210. VWP permits may authorize raw water withdrawals, dredging and filling, and impacts to wetlands and streams from a variety of activities. DEQ reviews VWP permits through the Joint Permit Application process, which involves DEQ, the U.S. Army Corps of Engineers, the Virginia Marine Resources Commission, and Local Wetlands Boards. During the permit application review, DEQ coordinates with other stakeholders such as the Virginia Institute of Marine Science, the Virginia Department of Game and Inland Fisheries, the Department of Conservation and Recreation, the United States Fish and Wildlife Service, the Environmental Protection Agency and VDH.

1.5 GW Permits

GW permits are issued for withdrawals that occur within designated Groundwater Management Areas (GWMAs) and are administered under 9VAC25-600 and 9VAC25-610. The two GWMAs encompass Virginia's Coastal Plain east of I-95, including the Eastern Shore (Accomack and Northampton counties).

2. DEQ WATER PERMITTING AND WATER PLANNING DIVISIONS - PERMIT COORDINATION PROCEDURES

2.1 VPDES Permits

New issuance, major modification, and re-issuance applications for individual permits will be sent directly to the appropriate ODW Field Office for review. These will include municipal and industrial (with or without sewage) permit types. Ordinarily, draft and final permits will not be reviewed by VDH, unless specifically

requested otherwise. ODW may request to review the draft permit; this is at the discretion of the ODW Field Office.

DEQ will transmit the application with the map(s) but most likely without other attachments. After receiving the application, ODW may request the attachments, if necessary for review. In the case of industrial permit applications, these attachments may be several hundred pages.

After receipt of the VPDES permit application, the ODW Field Office shall forward a copy of the application to the Local Health Department for review if needed. Approximately 95% of VPDES applications are for the re-issuance of existing permits. If no changes in the discharge activity are proposed in the application, input from Local Health may not be needed. Local Health shall be contacted for all new discharges.

Applications that are directed to Local Health for review should be sent to the attention of the local Environmental Health Manager. Interagency communication may be by fax, e-mail or regular mail, whichever method is most expedient and acceptable to the respective offices. ODW shall include Local Health comments with ODW's response to DEQ.

ODW response shall be within 14 days, unless more time is specified in DEQ's communication. The review response may be transmitted by fax, e-mail or regular mail to DEQ, whichever method is most expedient and acceptable to the DEQ Regional Office and the ODW Field Office. Use the example response memorandum in Attachment 1.

2.2 VPA Permits

All individual VPA permit applications will be sent by DEQ concurrently to the appropriate ODW Field Office and the VDH Local Health District with jurisdiction over the location of the proposed pollutant management activity or project for review. ODW response shall be within 14 days, unless more time is specified in DEQ's communication. The review response may be transmitted by fax, e-mail or regular mail to DEQ, whichever method is most expedient and acceptable to the DEQ Regional Office and the ODW Field Office. Use the example response memorandum in Attachment 1.

2.3 VPDES and VPA Permits with Water Reclamation and Reuse

DEQ Regional Offices will provide the following documents to the appropriate ODW Field Office for each water reclamation and reuse proposal, depending upon the type of permit and action involved:

- Issuance or reissuance of a VPDES or VPA Permit that will include water reclamation and reuse:
 - VPDES or VPA permit application;
 - Water Reclamation and Reuse Addendum to an Application for a VPDES or VPA Permit (Application Addendum); and
 - Cumulative Impact Analysis (CIA) results summary, if applicable.
- Modification (major or minor) of a VPA permit to include water reclamation and reuse:
 - Permit modification application;
 - Application Addendum; and
 - CIA results summary, if applicable.

DEQ may also issue an administrative authorization or an emergency authorization for water reclamation and reuse associated with an existing VPDES or VPA permit, in accordance with DEQ's regulations. In these cases, DEQ Regional Offices will provide the following documents to the appropriate ODW Field Office:

- Administrative authorization associated with an existing VPDES permit to include water reclamation and reuse:
 - Existing VPDES permit;
 - Application Addendum; and
 - CIA results summary, if applicable.

- Emergency authorization associated with an existing VPDES or VPA permit to include water reclamation and reuse:
 - Existing VPDES or VPA permit;
 - Application for an Emergency Authorization to Produce, Distribute or Reuse Reclaimed Water (Emergency Authorization Application) or the Application Addendum including an Emergency Authorization Application; and
 - CIA results summary, if applicable.

Cumulative Impact Analysis (CIA)

Only new or expanding water reclamation and reuse projects having the potential to reduce the VPDES permitted wastewater treatment works to surface waters may require a CIA. This includes emergency authorizations. The CIA will be performed by the DEQ Office of Water Supply (DEQ-OWS) for a prospective applicant, and must be completed prior to submittal of the Application Addendum and/or Emergency Authorization Application.

When a CIA is required for a water reclamation and reuse project, DEQ-OWS will coordinate with ODW much the same way it does regarding a VWP permit application for a surface water withdrawal. DEQ-OWS provides a summary of the CIA results to the applicant, and the applicant must provide this information with the Application Addendum and/or Emergency Authorization Application to the DEQ Regional Offices. Consequently, ODW Field Offices may see the water reclamation and reuse project twice – during the CIA, if required for the project, and again with the Application Addendum and/or Emergency Authorization Application.

ODW response shall be within 14 days, unless more time is specified in DEQ’s communication. The review response may be transmitted by fax, e-mail or regular mail to DEQ, whichever method is most expedient and acceptable to the DEQ Regional Office and the ODW Field Office. Use the example response memorandum in Attachment 1.

2.4 VWP Individual Permits

DEQ will email all individual VWP applications, including new issuances, major modifications and re-issuances, to ODW Central Office via odwreview@vdh.virginia.gov. VWP applications may be for water withdrawal projects or other permitted activities, such as dredging, filling and other land clearing activities. In some cases, DEQ may refer to this permit application material as a Joint Permit Application or JPA.

DEQ will invite ODW staff to attend VWP permit pre-application meetings for public water supplies; participation by ODW field staff is strongly encouraged. ODW will invite DEQ staff to preliminary engineering conferences for projects that include new or modified surface water intakes.

During the review of waterworks’ withdrawal projects, the ODW Field Office staff shall, at a minimum:

- Check historic water use records for at least the past 12 months; and
- Verify if there has been any change in waterworks capacity as compared to their existing operations permit.

ODW response shall be within 14 days, unless more time is specified in DEQ’s communication. The review response shall be transmitted by e-mail to DEQ. Use the example response memorandum in Attachment 2.

DEQ will provide a copy of the final VWP permit to ODW Central Office for waterworks withdrawals only via odwreview@vdh.virginia.gov. ODW Central Office will save the permit in the corresponding field office folder at <\\odwsrv1\odwshare\08-Documents and Data Files\807-VWP Permits> and will notify the ODW Field Office Director of its availability. Other VWP permits, including surface water withdrawals from industry, agriculture, etc., must be requested by ODW.

2.5 GW Permits

DEQ will email a copy of all draft new/revised GW permits affecting waterworks to ODW Central Office via odwreview@vdh.virginia.gov.

NOTE: DEQ may issue GW permits to existing users as a result of a GWMA expansion, based on historic water use. DEQ will issue these permits without ODW's review. GW Permits may impact waterworks operations permit capacity. Consequently the operations permit should be reviewed at this time, and the permit status should be updated in "R&R" as needed.

DEQ will take the lead in permitting new withdrawals in GWMA's and will coordinate with ODW on a joint GW permit pre-application meeting / preliminary engineering conference related to waterworks wells. Coordination of well site inspections for proposed wells should also be included in the meeting. Refer to WM 813 and the ODW *Project Review and Permit Procedures Manual* for further procedures related to well development and construction permits.

During the review process the ODW Field Office shall, at a minimum:

- Check historic water use records for at least the past 12 months; and
- Compare the maximum monthly and annual historic consumption with DEQ's permit values.

ODW response shall be within 14 days, unless more time is specified in DEQ's communication. The review response shall be transmitted by e-mail to DEQ. Use the review form and the example response memorandum in Attachments 3 and 4, respectively.

DEQ-OWS will provide a copy of all final GW permits to ODW Central Office for waterworks withdrawals only via odwreview@vdh.virginia.gov. ODW Central Office will save the permit in the corresponding field office folder at <\\odwsrv1\odwshare\08-Documents and Data Files\808-GW Permits> and will notify the ODW Field Office Director of its availability. Other GW permits, including groundwater withdrawals from industry, agriculture, etc., must be requested by ODW.

3. OTHER DEQ PROGRAMS

DEQ also administers other programs which may require input or interaction with ODW's field staff. The following four programs are the most likely to engage the ODW Field Offices.

3.1 Groundwater Characterization Program

The Groundwater Characterization Program collects, evaluates and interprets technical information necessary to manage the Commonwealth's groundwater resources. DEQ staff works to support resource management decisions, water supply planning activities, assess groundwater availability, facilitate drought monitoring, and support the expansion or creation of Groundwater Management Areas.

ODW assists the DEQ-OWS Groundwater Characterization program by providing well site approval letters and other well information, including legacy or new Water Well Completion Reports (Form GW-2), well yield, drawdown and recovery test reports, well lot plats or location maps, and all water characterization test results. It is important to label the documents with the following information:

- PWSID number (if established, otherwise use the field office number and Locality Code followed by 000; for example: 6107000 for new well - Culpeper Field Office, Loudoun County);
- SDWIS Facility Code for the well, if established (by example: WL001); and
- Well latitude and longitude coordinates and datum, when possible.

Refer to WM 813 for specific procedures related to receipt and update of GW-2 forms through the VAHydro web portal, and the *Project Review and Permit Procedures Manual* for specific guidance on

transfer of other well data to DEQ.

3.2 Water Supply Planning Program

The DEQ-OWS administers the Water Supply Planning Program under 9VAC25-780. The regulation requires all counties, cities and towns in the Commonwealth to prepare and update local or regional water supply plans, which will be used in the development of a comprehensive statewide water supply plan.

Objectives for this planning process are to:

- Ensure that adequate and safe drinking water is available to all citizens of the Commonwealth;
- Encourage, promote and protect all other beneficial uses of the Commonwealth's water resources; and
- Encourage, promote and develop incentives for alternative water sources, including, but not limited to desalinization.

Local and Regional Water Supply Plans were submitted to DEQ-OWS by November 2, 2011, and reviewed by ODW. VDH's participation in the program is anticipated to be once every ten years, per 9VAC25-780 E. However, there may be instances in which ODW might be required to assist on a more frequent basis pursuant to 9VAC25-780 D (no later than five years after a compliance determination by the State Water Control Board). Interagency review procedures will be developed when the need arises.

3.3 Environmental Impact Review

The DEQ Office of Environmental Impact Review coordinates the Commonwealth's responses to environmental documents for proposed state and federal agency projects as well as federally-permitted and federally-funded projects, except for some Virginia Department of Transportation (VDOT) projects. VDOT roadway projects are coordinated through a separate review program called the State Environmental Review Process, which is managed by VDOT. The ODW Central Office responds to these directly. DEQ EIR staff distributes documents to the appropriate state agencies, planning districts and localities for their review and comment. Upon consideration of all comments, DEQ prepares a single state response.

The ODW Central Office will coordinate the processing of documents originating from DEQ's Office of Environmental Impact Review. ODW Central Office will be the primary point of contact for DEQ through the odwreview@vdh.virginia.gov email address. All requests will be processed according to the ODW Central Office standard operating procedures.

The ODW Central Office may request input from Field Offices and other Central Office programs (e.g. Office of Environmental Health Services and Office of Radiological Health). It is very important that comments be returned to the Central Office prior to the end of the comment period indicated. Comments should specifically address impacts to waterworks sources and capacity concerns. An e-mail response from the Field Office reviewer directly to the Central Office requestor is preferred.

3.4 Solid & Hazardous Waste Regulation

DEQ's Division of Land Protection & Revitalization manages several programs, including permitting of solid waste and hazardous waste transportation, treatment and disposal facilities.

ODW Central Office will coordinate the processing of documents originating from DEQ's Division of Land Protection & Revitalization in a similar manner as those from the DEQ's Office of Environmental Impact Review. Requests will be made to ODW Central Office through the odwreview@vdh.virginia.gov email address for coordinated VDH review.

4. RECORDS MANAGEMENT PROCEDURES

Records of all review-related materials, such as memos, letters, emails, draft permits and attachments, shall be maintained in accordance with WM 630.

5. USEFUL LINKS

Location and contact information for DEQ Regional Offices is available at the following location:

<http://www.deq.virginia.gov/Locations.aspx>.

The main webpage for DEQ's Groundwater Withdrawal Permitting Program is:

<http://www.deq.virginia.gov/Programs/Water/PermittingCompliance.aspx>

It contains information about related regulations, staff contact information, GWMA maps, permit fees, forms, public notices and permits issued after January 1, 2014.

END OF MEMO

Attachment 1 to Working Memo 878
VPDES And VPA Permit Review Response Memorandum

{Field Office Letterhead}

DATE: *month day, year*
FROM: *Authorized Respondent Name and Title*
TO: *Permit Writer Name*
DEQ Regional Office Name
Street Address or P.O. Box
City, State, Zip

CITY/COUNTY:
APPLICANT:
PERMIT TYPE: *Choose one:* VPDES / VPA *Add as necessary:* with water reclamation and reuse
APPLICATION TYPE: *Choose one:* Issuance (New) / Re-Issuance (Existing)
PROJECT:
SUBJECT: Review response for DEQ’s permit application # _____

Our office has reviewed the application for *{describe discharge and the related water reclamation and reuse activity, when applicable, and the location}*.

Select from the following statements, as applicable

The nearest downstream raw water intake is located approximately ____ miles from the discharge point/area. The name of the facility is _____ and operates under PWSID _____.

The nearest upstream (under tidal influence) raw water intake is located approximately ____ miles from the discharge point/area. The name of the facility is _____ and operates under PWSID _____.

No public raw water intakes in Virginia were found downstream (or upstream *(if under tidal influence)*) from the discharge point/area.

The following wells were found within a 1-mile radius from the discharge:

PWSID	Facility Name	SDWIS Facility Code

We are concerned the discharge may jeopardize the ability of the waterworks mentioned above to maintain compliance with the SDWA and its amendments because _____.

For reviews including water reclamation and reuse, use the following statement when applicable

We have identified the following risks which may have an impact on public health, as a result of the proposed water reclamation and reuse: _____.

If needed, use/incorporate other comments below

Please forward a copy of the [*Choose one:* draft permit / final permit] for our files.

cc: VDH, ODW – Central Office
 VDH, Local Health Dept.

Attachment 1 to Working Memo 878
VPDES And VPA Permit Review Response Memorandum

Applicant

Optional: Potentially Impacted Waterworks

Attachment 2 to Working Memo 878
VWP Permit Review Response Memorandum

{Field Office Letterhead}

DATE: *month day, year*
FROM: *Authorized Respondent Name and Title*
TO: *Permit Writer Name*
DEQ Regional Office Name
Street Address or P.O. Box
City, State, Zip

CITY/COUNTY:
APPLICANT:
PERMIT TYPE: VWP
APPLICATION TYPE: *Choose one:* Issuance (New) / Re-Issuance (Existing)
PROJECT:
SUBJECT: Review response for DEQ's permit application # _____

Our office has reviewed the application for *{describe activity and location}*.

If the VWP Permit is for a waterworks

We are aware that the following modifications have been made to the waterworks: _____. The changes [*Choose one:* increase / decrease] the waterworks capacity, as compared to their existing Waterworks Operation Permit.

The waterworks' service area [*Choose one:* remains the same / has increased / has decreased].

If the VWP Permit is for other than a waterworks; match the following statements, as applicable

The nearest downstream raw water intake is located approximately ___ miles from the *{activity}* area. The name of the facility is _____ and operates under PWSID _____.

The nearest upstream (under tidal influence) raw water intake is located approximately ___ miles from the *{activity}* area. The name of the facility is _____ and operates under PWSID _____.

No public raw water intakes were found, in the commonwealth, downstream (or upstream *if located within one tidal cycle*) from the *{activity}* area.

cc: VDH, ODW – Central Office
VDH, Local Health Dept.
Applicant
Optional: Potentially Impacted Waterworks

Attachment 3 to Working Memo 878
GW Permit Review Form

DATE: *month day, year*
PREPARED BY: *Authorized Reviewer Name and Title*
CITY/COUNTY:
APPLICANT:
PERMIT TYPE: GW
APPLICATION TYPE: *Choose one:* Issuance (New) / Re-Issuance (Existing)
SUBJECT: Review form for Draft DEQ GW Permit #: GW _____

LOCATION OF WELL(s)¹:

VDH WELL ID	DEQ WELL ID	LATITUDE	LONGITUDE

SUMMARY:

WATERWORKS REVIEW	RESULTS
Average daily water usage for the past 12 months, gpd	
Maximum monthly withdrawal during the past 12 months, gallons	
Total annual withdrawal during the past 12 months, gallons	
Draft DEQ Permit maximum yearly withdrawal limit, gallons	
Draft DEQ Permit maximum monthly withdrawal, gallons	

WELL ID # ²			
Total well depth, ft			
Current pump intake setting, ft			
Date of last Yield and Drawdown Test			
Stabilized water level based on last Yield and Drawdown Test, ft			
Draft DEQ Permit maximum well pump setting, ft			

Use additional sheets if there are more than three (3) wells.

¹ Use VDH collected coordinates whenever available (DEQ's should only be used as an alternative). If DEQ coordinates are used, use '*' next to latitude and longitude values to indicate this.

² Assign VDH Well IDs whenever available (DEQ's should only be used as an alternative).

{Field Office Letterhead}

DATE: *month day, year*
FROM: *Authorized Respondent Name and Title*
TO: *Permit Writer Name*
DEQ Groundwater Withdrawal Permitting Program
Street Address or P.O. Box
City, State, Zip

CITY/COUNTY:
APPLICANT:
PERMIT TYPE: GW
APPLICATION TYPE: *Choose one:* Issuance (New) / Re-Issuance (Existing)
PROJECT:
SUBJECT: Review response for Draft DEQ GW Permit #: GW _____

Our office has reviewed the draft Groundwater Withdrawal permit for *{describe location of withdrawal}*.

The reported maximum water usage for the past ___ months is within the capacity defined in the Waterworks Operations Permit.

When applicable, use the following statement

We are aware that the following modifications have been made to the waterworks: _____.
The changes [*Choose one:* increase / decrease] the waterworks capacity, as compared to their existing Waterworks Operation Permit.

The waterworks' service area [*Choose one:* remains the same / has increased / has decreased].

Choose one of the following paragraphs

- 1) The requirements indicated in the draft Groundwater Withdrawal Permit are not more restrictive than the historical monthly or annual withdrawal for the past ___ months. If final permit remains consistent with the draft, no further action is necessary by the waterworks owner.
- 2) The requirements indicated in the draft Groundwater Withdrawal permit are more restrictive than the capacity of the [*Use all that apply:* historical monthly withdrawal and/or annual withdrawal] for the past ___ months. If final permit remains consistent with the draft, the waterworks operations will be impacted.

When applicable, use the following statement

[The waterworks owner will be required to conduct a pump test on each well to assess the impact of the new well pump setting(s) indicated in the draft Groundwater Withdrawal permit. Based on the pump test results and the maximum water usage data, the permitted capacity of this waterworks will be re-evaluated, per Waterworks Regulations.]

If DEQ determines that an Aquifer Test will be required, the ODW will be contacted for coordination on the possibility to perform the Aquifer Test in conjunction with the Pump Test.

Attachment: GW Permit Review Form

cc: VDH, ODW – Central Office
VDH, Local Health Dept.
Applicant