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WWTPs are so complicated they require individual permits. If a solution includes infrastructure upgrades and reviewing engineering reports, doesn't that require an engineer to review? The noted alternative of adding monitoring to existing individual permits that are already under the purview of an engineer seems a more effective and faster approach than writing a new general permit. The effort needed to create a new general permit is better used to simultaneously modify existing permits that would still allow for increased stakeholder collaboration, get them on a similar schedule and build on the existing foundation rather than starting over. It would also bring currently expired individual permits into compliance.