

OhioEPA

2008

Compliance Assistance Conference



Do I need an NPDES Discharge Permit? How do I get one?

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Division of Surface Water

Northwest District Office



Session Overview

- ★ I. What is an NPDES permit
 - ★ History of Clean Water Act

- ★ II. Who needs to apply for an NPDES permit

- ★ III. Types of NPDES Permits
 - ★ Individual NPDES Permits
 - ★ General NPDES Permits
 - ★ Indirect Discharge Permits

- ★ IV. How to apply for an NPDES permit
 - ★ Application forms
 - ★ Antidegradation



The Clean Water Act

- ★ Fires occurred on the Cuyahoga River in 1868, 1883, 1887, 1912, 1922, 1936, 1941, 1948, 1952, and June 22, 1969.
- ★ The 1969 fire brought national attention to environmental problems in the U.S.







I. The Clean Water Act

- ★ 1972 – Congress passes the Federal Water Pollution Control Act Amendments
 - ★ Establishes the National Pollutant Discharge Elimination System (NPDES) permit program
 - ★ National goal to eliminate discharge of pollutants by 1985.
 - ★ Fishable/swimable goal
 - ★ Provided for authorization of state run programs



I. The Clean Water Act

- ★ 1977- Congress passes the Clean Water Act
 - ★ Identified a list of 129 priority pollutants
 - ★ Identified a list of 21 primary industries for technology based controls
 - ★ Made it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit was obtained under its provisions



I. The Clean Water Act

- ★ O.A.C. 3745-33-02 - No person may discharge any pollutant or cause, permit, or allow a discharge of any pollutant without applying for and obtaining an Ohio NPDES permit in accordance with the requirements of the chapter.



II. Who needs to apply for an NPDES Permit

- ★ Anyone who proposes a discharge of pollutants to waters of the State.
- ★ “Waters of the state” means all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, irrigation systems, drainage systems, and other bodies or accumulations of water, surface and underground, natural or artificial....



II. Who needs to apply for an NPDES Permit



II. Who needs to apply for an NPDES Permit.

★ Examples of questions to ask yourself

1. Does my business generate any liquid wastes or process wastewaters? Where do these wastes go? This includes things like cooling waters, blowdown waters, rinse waters.

If these are discharged from your site (via sewers or directly to a creek) you need a NPDES permit.



II. Who needs to apply for an NPDES Permit.

★ Examples of questions to ask yourself

2. Do I have stormwater that discharges from my site?

Depending on your operations you may need to apply for NPDES permit coverage for your stormwater discharge.



II. Who needs to apply for an NPDES Permit.

★ Examples of questions to ask yourself

3. Where does my sewage go? Do I have my own sewage treatment plant that discharges?

If you have your own sewage treatment plant you need an NPDES permit for the discharge.



III. Types of NPDES permits

- ★ Ohio has two main types of NPDES permits
 - ★ Individual NPDES permits
 - ▶ Individual permits are site specific
 - ▶ Monitoring of pollutant and limits developed just for that facility
 - ★ General NPDES permits
 - ▶ Issued for a geographic area (entire state, Lake Erie) or group of related discharges (marinas, non-contact cooling water) with uniform pollutant monitoring



III. Types of NPDES permits

- ★ Individual NPDES permits
 - ★ Municipal wastewater treatment plants
 - ★ One of the 56 industries that have technology based requirements (Federal Effluent Guidelines)
 - ★ Industrial facilities that discharge stormwater that has potential to effect water quality in receiving stream



III. Types of NPDES permits

- ★ Available General NPDES permits in Ohio
 - ★ Construction Site Storm Water
 - ★ Industrial Storm Water
 - ★ Non-contact Cooling Water
 - ★ Petroleum Bulk Storage Facilities
 - ★ Petroleum-related Corrective Actions
 - ★ Water Treatment Plants, Concentrated Animal Feeding Operations (CAFOs), Construction Site Storm Water in the Big Darby Creek Watershed, Household Sewage Treatment Systems, Hydrostatic Test Water, Small MS4 Storm Water – Baseline, Small MS4 Storm Water - Rapidly Developing Watershed, Small Sanitary Discharges That Cannot Meet BADCT Standards, Coal Surface Mining Activities, Temporary Wastewater Discharges, Storm Water Discharges Associated with Industrial Activity From Marinas, Small Sanitary Discharges

III. Types of NPDES permits

★ Indirect Discharge Permit (IDP)

- ★ Included in section 307 of the Clean Water Act
 - ▶ Required development of national standards for industrial discharges to a sewer system
- ★ Ohio rules OAC 3745-36 set up the IDP and publically owned treatment works approved pretreatment program for our state



III. Types of NPDES permits

- ★ Indirect Discharge Permit (IDP) continued
 - ★ If your facility is one of the industries that the federal government has developed pretreatment standards or
 - ★ Your facility discharges more than 25,000 gallons per day to the sewer system

You are required to apply for an IDP!!!!



III. Types of NPDES permits

- ★ Indirect Discharge Permit (IDP) continued
 - ★ Ohio rules allow for municipalities to create their own pretreatment program.
 - ★ 104 municipalities in the state have an approved program.
 - ★ Instead of Ohio EPA issuing an IDP, the municipalities are in charge of writing the permit, assuring compliance, and conducting enforcement.



IV. How to apply for an NPDES permit

- ★ Permit applications should be submitted 180 days prior to start of discharge.
- ★ Submit the required application forms and \$200 application fee to the appropriate district office.



IV. How to apply for an NPDES permit

★ The application forms

- ★ All applications require Form 1, appropriate Form 2, and a completed antidegradation addendum.

★ Form 2

- ★ 2A – Application for discharge from a POTW
- ★ 2B – CAFO and aquaculture
- ★ 2C – Existing manufacturing, commercial
- ★ 2D – New discharges of process wastewater
- ★ 2E – Facilities that do not discharge process wastewaters
- ★ 2F – Discharge of stormwater associated with industrial activities



IV. How to apply for an NPDES permit

★ Form 1

- ★ Requires basic information, only 2 pages!!
 - ▶ Company name, address, and location
 - ▶ Standard Industrial Classification (SIC) code
 - ▶ Nature of business
 - ▶ Original ink signature by appropriate persons

OAC 3745-33-03



Please type. Do not complete by hand.

FORM 1 GENERAL		EPA		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permit Program</i> <i>(Read the "General Instructions" before starting)</i>		I. EPA I.D. NUMBER			
LABILITIES						If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.			
I. EPA I.D. NUMBER									
III. FACILITY NAME									
V. FACILITY MAILING ADDRESS									
VI. FACILITY LOCATION									
II. POLLUTANT CHARACTERISTICS									
INSTRUCTIONS: Complete A through G to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.									
SPECIFIC QUESTIONS				MARK 'X'		SPECIFIC QUESTIONS		MARK 'X'	
				YES NO FORM ATTACHED					
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)						B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			
C. Is this a facility which currently results in discharge to waters of the U.S. other than those described in A or B above? (FORM 2C)						D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			
E. Is this a facility which does not discharge process wastewater? (FORM 2E)						F. Is this a facility which discharges stormwater associated with industrial activity? (FORM 2F)			
G. Do you generate sewage sludge that is ultimately regulated by Part 503? Do you generate sewage sludge that is sent to another facility for treatment or blending? Do you process or utilize material from sewage sludge that is unprocessed in a manner subject to Part 503? (FORM 2G)									
III. NAME OF FACILITY									
IV. FACILITY CONTACT									
A. NAME & TITLE (last, first, middle)						B. PHONE (area code & no.)			
						() -			
V. FACILITY MAILING ADDRESS									
A. STREET OR P.O. BOX									
B. CITY OR TOWN				C. STATE		D. ZIP CODE			
VI. FACILITY LOCATION									
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIERS									
B. COUNTY NAME									
C. CITY OR TOWN				D. STATE		E. ZIP CODE		F. COUNTY CODE (where applicable)	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)	
A. FIRST <i>(specify)</i>	B. SECOND <i>(specify)</i>
C. THIRD <i>(specify)</i>	D. FOURTH <i>(specify)</i>

VIII. OPERATOR INFORMATION	
A. NAME	B. Is the name listed in Item VIII-A also the owner? <input type="checkbox"/> Yes <input type="checkbox"/> No
C. STATUS OF OPERATOR <i>(Enter the appropriate letter into the answer box; if "Other", specify.)</i> F = FEDERAL S = STATE P = PRIVATE M = PUBLIC <i>(other than federal or state)</i> O = OTHER <i>(specify)</i>	D. PHONE <i>(area code & no.)</i> () -
E. STREET OR P.O. BOX	

F. CITY OR TOWN	G. STATE	H. ZIP CODE	IX. INDIAN LAND Is this facility located on Indian lands? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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X. EXISTING ENVIRONMENTAL PERMITS	
A. NPDES <i>(Discharges to surface water)</i>	D. PSD <i>(Air emissions from proposed sources)</i>
B. UIC <i>(Underground injection of fluids)</i>	E. OTHER <i>(specify)</i>
C. RCRA <i>(Hazardous waste)</i>	F. OTHER <i>(specify)</i>

XI. MAP
Attach to this application a topographical map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS <i>(provide a brief description)</i>

XIII. CERTIFICATION <i>(see instructions)</i>		
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.		
A. NAME & OFFICIAL TITLE <i>(type or print)</i>	B. SIGNATURE	C. DATE SIGNED
COMMENTS FOR OFFICIAL USE ONLY		

IV. How to apply for an NPDES permit

- ★ Form 2C – Existing Manufacturing and commercial discharges
 - ★ Requires information specific to each discharge
 - ★ Sections I-IV include Outfall descriptions, Production information, etc
 - ★ Section V includes chemical analysis of discharge
 - ▶ Section V has four parts, A, B, C, and D.



IV. How to apply for an NPDES permit

- ★ From 2C (continued)

- ★ Section V,A

- ▶ Completed by all applicants, conventional pollutants

- ★ Section V,B

- ▶ Chemical analysis required for parameters that have federal limitation guidelines established and other known pollutants in your discharge



IV. How to apply for an NPDES permit

★ Form 2C (continued)

★ Section V,C

- ▶ Required if your discharge is from one of the 34 primary industries included in the instructions
- ▶ Small business exemption - your gross total annual sales for the most recent three years average less than \$100,000 per year – don't have to test for toxic organics

★ Section V,D

- ▶ List any of the toxic or hazardous pollutants on the instruction forms that may be present in your discharge



EPA I.D. NUMBER (copy from Item 1 of Form 1)

Form Approved.
OMB No. 2040-0086.
Approval expires 3-31-98.

Please print or type in the unshaded areas only.

FORM
2C
NPDES



U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURE OPERATIONS
Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUTFALL NO. (list)	2. OPERATION(S) CONTRIBUTING FLOW		3. TREATMENT	
	a. OPERATION (list)	b. AVERAGE FLOW (include units)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

YES (complete the following table)

NO (go to Section III)

1. OUTFALL NUMBER (list)	2. OPERATION(s) CONTRIBUTING FLOW (list)	3. FREQUENCY		4. FLOW					
		a. DAYS PER WEEK (specify average)	b. MONTHS PER YEAR (specify average)	a. FLOW RATE (in mgd)		B. TOTAL VOLUME (specify with units)		C. DURATION (in days)	
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY		

III. PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

YES (complete Item III-B)

NO (go to Section IV)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)?

YES (complete Item III-C)

NO (go to Section IV)

C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION			2. AFFECTED OUTFALLS (list outfall numbers)
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)

OUTFALL NO. _____

PART A –You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT						3. UNITS (specify if blank)		4. INTAKE (optional)			
	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRS. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	e. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Biochemical Oxygen Demand (BOD)												
b. Chemical Oxygen Demand (COD)												
c. Total Organic Carbon (TOC)												
d. Total Suspended Solids (TSS)												
e. Ammonia (as N)												
f. Flow	VALUE		VALUE		VALUE					VALUE		
g. Temperature (winter)	VALUE		VALUE		VALUE			°C		VALUE		
h. Temperature (summer)	VALUE		VALUE		VALUE			°C		VALUE		
i. pH	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM				STANDARD UNITS				



PART B – Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Bromide (24959-67-9)														
b. Chlorine, Total Residual														
c. Color														
d. Fecal Coliform														
e. Fluoride (16984-48-8)														
f. Nitrate-Nitrite (as N)														



PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant if you know or have reason to believe it will be discharged in concentrations of 10 ppb or greater. If you mark column 2c for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2 methyl 4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (all 7 pages) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER <i>(if available)</i>	2. MARK "X"			3. EFFLUENT						4. UNITS		5. INTAKE <i>(optional)</i>			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE <i>(if available)</i>		c. LONG TERM AVRG. VALUE <i>(if available)</i>		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		(1) CONCENTRATION		(2) MASS		
														(1) CONCENTRATION	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)															
2M. Arsenic, Total (7440-38-2)															
3M. Beryllium, Total (7440-41-7)															
4M. Cadmium, Total (7440-43-9)															
5M. Chromium, Total (7440-47-3)															
6M. Copper, Total (7440-50-8)															
7M. Lead, Total (7439-92-1)															



IV. How to apply for an NPDES permit

- ★ Form 2D – New discharges of process wastewater
 - ★ Requires information specific to each discharge
 - ★ Sections I-IV include Outfall descriptions, Production information, etc
 - ★ Section V includes information on pollutants to be discharged
 - ★ No analysis or sampling required....
estimated quantities!!!!



Form
2D
NPDES



New Sources and New Dischargers Application for Permit to Discharge Process Wastewater

I. Outfall Location

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

Outfall Number <i>(list)</i>	Latitude			Longitude			Receiving Water <i>(name)</i>
	Deg.	Min.	Sec.	Deg.	Mn.	Sec.	

II. Discharge Date (When do you expect to begin discharging?)

III. Flows, Sources of Pollution, and Treatment Technologies

A. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

Outfall Number	1. Operations Contributing Flow <i>(List)</i>	2. Average Flow <i>(Include Units)</i>	3. Treatment <i>(Description or List codes from Table 2D-1)</i>

IV. Production

If there is an applicable production-based effluent guideline or NSPS, for each outfall list the estimated level of production (projection of actual production level, not design), expressed in the terms and units used in the applicable effluent guideline or NSPS, for each of the first 3 years of operation. If production is likely to vary, you may also submit alternative estimates (attach a separate sheet).

Year	A. Quantity Per Day	B. Units Of Measure	c. Operation, Product, Material, etc. <i>(specify)</i>



V. Effluent Characteristics

A and B: These items require you to report estimated amounts (*both concentration and mass*) of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See table 2D-2 for Pollutants)

Each part of this item requests you to provide an estimated daily maximum and average for certain pollutants and the source of information. Data for all pollutants in Group A, for all outfalls, must be submitted unless waived by the permitting authority. For all outfalls, data for pollutants in Group B should be reported only for pollutants which you believe will be present or are limited directly by an effluent limitations guideline or NSPS or indirectly through limitations on an indicator pollutant.

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)



IV. How to apply for an NPDES permit

- ★ 2F – Stormwater Associated with Industrial Activity
- ★ US EPA definition: means the discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant.





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IV. How to apply for an NPDES permit

- ★ 2F Form (continued)
- ★ 11 categories of stormwater required to obtain NPDES permit coverage defined in 40 CFR 122.26(b)(14)(i)-(xi)
- ★ Category One (i): Facilities with effluent limitations
- ★ Category Two (ii): Manufacturing
- ★ Category Three (iii): Mineral, Metal, Oil and Gas
- ★ Category Four (iv): Hazardous Waste, Treatment, or Disposal Facilities

IV. How to apply for an NPDES permit

- ★ 2F Form (continued)
- ★ Category Five (v): Landfills
- ★ Category Six (vi): Recycling Facilities
- ★ Category Seven (vii): Steam Electric Plants
- ★ Category Eight (viii): Transportation Facilities
- ★ Category Nine (ix): Treatment Works
- ★ Category Ten (x): Construction Activity
- ★ Category Eleven (xi): Light Industrial Activity

IV. How to apply for an NPDES permit

- ★ Lets focus on a few of these categories
- ★ Category One: Facilities with effluent limitations
 - ★ Facilities that have effluent guidelines included in 40 CFR
- ★ Category Two: Manufacturing
 - ★ Standard Industrial Classifications 24 (except 2434), 26 (except 265 and 267), 28 (except 283 and 285) 29, 311, 32 (except 323), 33, 3441, 373;



IV. How to apply for an NPDES permit

★ Category Six: Recycling Facilities

- ★ Facilities involved in the recycling of materials, including metal scrapyards, battery reclaimers, salvage yards, and automobile junkyards, including but not limited to those classified as Standard Industrial Classification 5015 and 5093;

★ Category Eleven: Light Industrial Activity

- ★ Facilities under Standard Industrial Classifications 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39, 4221-25

IV. How to apply for an NPDES permit

- ★ 2F Form – Filling out the application
 - ★ Section I, Outfall locations and receiving waters
 - ★ Section II, Are you currently required by any entity to upgrade your facility in such a way that would affect your stormwater discharge? If so, describe.
 - ★ Section III, Site drainage map – the more detail the better!!!
 - ★ Section IV, For each outfall provide a description of the area drained, activities that take place in each area, and any stormwater control that exist

IV. How to apply for an NPDES permit

- ★ 2F Form – Filling out the application
 - ★ Section V, Certification that stormwater outfalls only contain stormwater
 - ★ Section VI, Provide description of any spills or leaks during the last three years
 - ★ Section VII, discharge information - sampling and analysis required



IV. How to apply for an NPDES permit

- ★ 2F Form – Filling out the application
 - ★ Section VII, Part A – Everyone must sample and test for these parameters, conventional pollutants
 - ★ Section VII, Part B – Sample and test for pollutants that have a effluent guideline for your facility, or are included in an existing NPDES permit
 - ★ Section VII, Part C – Sample and test for any other pollutant you have reason to believe to be present
- ★ Samples must be collect during a rain event

IV. How to apply for an NPDES permit

★ Antidegradation

- ★ The antidegradation rule is required by the Clean Water Act and federal regulations. Antidegradation must be part of any state's water quality standards program.
- ★ OAC 3745-1-05 Ohio's Antidegradation rule
- ★ All NPDES applications must include a completed antidegradation addendum



IV. How to apply for an NPDES permit

★ Antidegradation

- ★ Antidegradation provisions describe the conditions under which water quality may be lowered in surface waters. Existing beneficial uses must be maintained and protected
- ★ Any national pollutant discharge elimination system permit application that, if approved, would result in a net increase in the discharge of any regulated pollutant falls under the rule. Applies mostly to new or increased discharges.

IV. How to apply for an NPDES permit

★ Antidegradation

- ★ So what does the rule require of the Ohio EPA?
 - ▶ Public notice of receipt of application
 - ▶ Mandatory public hearing in limited cases
 - ▶ Optional public hearing if one is requested



IV. How to apply for an NPDES permit

★ Antidegradation

★ So what does the rule require of the Ohio EPA?

- ▶ For the majority of streams in the state the director may approve activities that lower water quality only if there has been an examination of non-degradation, minimal degradation and mitigative technique alternatives, a review of the social and economic issues related to the activity, a public participation process and appropriate intergovernmental coordination, and the director determines that the lower water quality is necessary to accommodate important social or economic development in the area in which the water body is located.

IV. How to apply for an NPDES permit

★ Antidegradation

- ★ So what does the rule require of the applicant?
 - ▶ Must provide a social, economic justification (SEJ) report that includes the investigation of different discharge alternatives.
 - ▶ The Director may require a different alternative than the facilities desired course of action after considering the SEJ and comments received from the public during a hearing or submitted in writing.

IV. How to apply for an NPDES permit

★ Antidegradation

- ★ The rule does not apply to any discharge in existence prior to July 1, 1993.
- ★ There are also several exclusions that eliminate the need for the applicant to provide the SEJ report.
 - ▶ Discharge of suspended solids at or below 65 mg/L
 - ▶ Discharge of oil and grease at or below 10 mg/L
 - ▶ de minimus net increase of regulated pollutants

IV. How to apply for an NPDES permit

- ★ If you have questions, contact your district office.
- ★ The more complete the application the quicker the turn around time will be.
- ★ Requests for missing or additional information take time.



Questions?

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