THE IMPORTANCE OF READING YOUR NPDES PERMIT

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NPDES AUTHORITY?

• Authorized by the Clean Water Act Section 402, Ohio Revised Code 6111.03

• Regulated under 40 CFR, OAC 3745
WHO IS AFFECTED BY THE PROGRAM?

- **Facility Designation**
  - Major (Muni \( \geq 1 \text{MGD}, \) Non-Muni-Rating Sheet)
  - Minor

- **Types of NPDES Permits**
  - Individual
  - General
    - Streamlined permitting process for specific classes or categories of discharges
Other Types Of Permits

• MS4
• Pre Treatment
• Stormwater

• All of these affect your NPDES permits in some shape or form
• You need these permits in place to ensure your NPDES permit limits are being met
5 BASIC SECTIONS-NPDES PERMIT

• **TITLE PAGE**- Permittee Name and Location, Permit Period, Authorizing Statement, Discharge Location.

• **EFFLUENT LIMITS-PART I.A**- Applicable technology-based and water quality–based standards.

• **MONITORING AND REPORTING REQUIREMENTS-PART I.B & I.C**- Other monitoring points-sludge, influent, streams, CSO etc. and compliance schedules

• **SPECIAL CONDITIONS-PART II**- Operator of Record, staffing, other requirements

• **STANDARD CONDITIONS-PART III (AKA “BOILERPLATE”)**- Legal administrative, and procedural requirements of the permit
# MONITORING TABLE

- Header: Effective Dates
- Parameters and Reporting Codes
- Limits
- Monitoring Frequencies
- Monitoring Months
- Sample Type (Grab, Composite, 24 Hour Composite...)
- Footnotes
<table>
<thead>
<tr>
<th>Effluent Characteristic</th>
<th>Discharge Limitations</th>
<th>Monitoring Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Parameter</strong></td>
<td><strong>Concentration</strong></td>
<td><strong>Loading</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Specified Units</strong></td>
<td><strong>kg/day</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Maximum</strong></td>
<td><strong>Minimum</strong></td>
</tr>
<tr>
<td>01220 - Chromium, Dissolved Hexavalent - mg/l</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>31648 - E. coli - #/100 ml</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>50050 - Flow Rate - MGD</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>50060 - Chlorine, Total Residual - mg/l</td>
<td>0.021</td>
<td>-</td>
</tr>
<tr>
<td>50060 - Chlorine, Total Residual - mg/l</td>
<td>0.021</td>
<td>-</td>
</tr>
<tr>
<td>50092 - Mercury, Total (Low Level) - ng/l</td>
<td>1700</td>
<td>-</td>
</tr>
<tr>
<td>61425 - Acute Toxicity, Ceriodaphnia dubia -TUa</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>61426 - Chronic Toxicity, Ceriodaphnia dubia -TUc</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>61427 - Acute Toxicity, Pimephales promelas -TUa</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>61428 - Chronic Toxicity, Pimephales promelas -TUc</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>61941 - pH, Maximum - S.U.</td>
<td>9.0</td>
<td>-</td>
</tr>
<tr>
<td>61942 - pH, Minimum - S.U.</td>
<td>-</td>
<td>6.0</td>
</tr>
<tr>
<td>70300 - Residue, Total Filterable - mg/l</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>80082 - CBOD 5 day - mg/l</td>
<td>-</td>
<td>15</td>
</tr>
<tr>
<td>80082 - CBOD 5 day - mg/l</td>
<td>-</td>
<td>24</td>
</tr>
</tbody>
</table>

Notes for Station Number 3PF00002001:
* Effluent loadings based on average design flow of 175 MGD.
  - Winter-1: November, March and April
  - Winter-2: December, January and February
  - Total residual chlorine - See Part II, Item J.
  - Total residual chlorine, winter months - “When discharging” means monitoring and reporting are required on days when the facility is chlorinating.
  - Mercury - See Part II, Items S, W, X and Y.
  - Free cyanide - See Part II, Item R.
  - Whole effluent toxicity - See Part II, Item U.
  - pH minimum - See Part II, Item Q.
MONITORING TABLE DETAILS

• Pollutant Parameters
  – MG/L, UG/L, NG/L ????
    • Contract Lab may not report in the same units; verify they can meet detection level requirements

Sample Type
  Composite is not the same as 24 hour composite
MONITORING TABLE DETAILS

• Monitoring Months
  – Monitoring Frequency Changes?

Footnotes

• Bis-2-Ehtylhexyl Phathalate
• Love Level Mercury
• Free Cyanide-New Method and Detection level must be utilized!
• Biomonitoring requirements
MONITORING TABLES FOOTNOTES

• REFER TO PARGRAPHS IN PART II

• YOU CANNOT USE THE MONITORING TABLE CORRECTLY WITHOUT READING PART II
INFORMATION FROM FOOTNOTES

• Bis-2-Ethylhexyl Phthalate
  – 3 Grab Composite, at least 30 minutes apart but no more than 2 hours apart, into a glass container; representative of a normal day flow. This should be refrigerated between grabs.

• FREE CYANIDE
  – Must utilize one of the new methods (ASTM D7237-10 or OIA-1677-09)
  – New Lower detection/Reporting Levels
INFORMATION FROM FOOTNOTES:

• Low Level Mercury
  – One Detention time later from 006-001 sampling stations
  – Method 1631-Performance based method
  – Detention time is based on flow!! (should develop a chart)

• Biomonitoring
  – Ensure you are monitoring on the proper months
  – Should consider permit MOD if not in routine quarterly months or pull other monthly parameters in conjunction with bioassay
NPDES PERMIT SECTIONS

• COMPLIANCE SCHEDULES ARE GIVEN (PART I.C):
  
  – Pretreatment Program
    • Local Limits development and implementation
  
  – Construction
    • E.G. Requirement for bypasses and/or overflows
NPDES PERMIT SECTIONS

• COMPLIANCE SCHEDULES (CONT.)
  – E.COLI
  – PREVIOUS PERMIT VIOLATIONS (NUTRIENTS)
  – NEW LIMITATION IMPOSED-TOTAL PHOSPHORUS
PART I.C. DETAILS

- Compliance Milestones-Required Report to Ohio EPA
  - Make sure you track those
  - Can you meet them?
  - Can lead to SNC

- DUE DATES BASE ON NPDES PERMIT EFFECTIVE DATE-MAKE A CALENDAR FOR YOURSELF
NPDES PERMIT SECTIONS: PART II OTHER CONDITIONS

• OPERATOR OF RECORD—**MUST BE DESIGNATED IN WRITING**

• DESCRIPTION OF OUTFALLS AND MONITORING STATIONS—MAKE SURE YOU VERIFY THESE ARE ACCURATE
NPDES PERMIT SECTIONS: PART II

• 300 Station (SSO) Reporting requirements
  – 24-Hour Call Followed by 5-day report.

• Sludge Station(S) Requirements
  – Annual report (January 31)
PART II

- MONITORING TABLE FOOTNOTES
  
  - Samples and Detention times
  - Bis-2 Special sample requirements
  - Low level mercury methods
  - **YOU CANNOT USE THE MONITORING TABLES CORRECTLY WITHOUT READING PART II**
PART II SPECIAL CONDITIONS

• Pretreatment
• Bioassay
• Mercury Variance

• THESE USUALLY CONTAIN COMPLIANCE MILETONES OR REPORTING REQUIREMENTS-ADD THEM TO YOUR CALENDAR
READ YOUR DRAFT PERMIT AND FACT SHEET

• Interim and Final Tables
  – Note new/different permit limits-explained in fact sheet-Don’t be afraid to ask why?
  – Coordinate with compliance schedule
READ YOUR DRAFT PERMIT AND FACT SHEET

• New numeric limit? Increased frequency? What does this cost?

• Compliance schedule
  – Everything in logical order?
  – Time allotted for tasks?
REVIEW BY OTHERS:

- Communicate with City Hall that you need it immediately!!
- Contract Laboratory
- Environmental Lawyer
- Others?
COMMENT IN WRITING BEFORE PUBLIC COMMENT PERIOD ENDS

• Letter to central office
  – Courtesy copy to district contact

• Ask for extension before the last day!
QUESTIONS?
THANK YOU FOR YOUR TIME AND ATTENTION!

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