

THE IMPORTANCE OF READING YOUR NPDES PERMIT

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THE CITY OF
COLUMBUS
ANDREW J. GINTHER, MAYOR

DEPARTMENT OF
PUBLIC UTILITIES

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 1MGD, 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
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- 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

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Parameter	Maximum	Minimum	Weekly	Monthly	Daily	Weekly			
01220 - Chromium, Dissolved Hexavalent - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
31648 - E. coli - #/100 ml	-	-	284	126	-	-	-	1/Day	Grab	Summer
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Continuous	All
50060 - Chlorine, Total Residual - mg/l	0.021	-	-	-	-	-	-	1/Day	Multiple Grab	Summer
50060 - Chlorine, Total Residual - mg/l	0.021	-	-	-	-	-	-	When Disch.	Multiple Grab	Winter
50092 - Mercury, Total (Low Level) - ng/l	1700	-	-	3.1	1.13	-	0.00205	1 / 2 Weeks	Grab	All
61425 - Acute Toxicity, Ceriodaphnia dubia - TUa	-	-	-	-	-	-	-	2/Year	24hr Composite	June and Oct.
61426 - Chronic Toxicity, Ceriodaphnia dubia - TUc	-	-	-	-	-	-	-	2/Year	24hr Composite	June and Oct.
61427 - Acute Toxicity, Pimephales promelas - TUa	-	-	-	-	-	-	-	2/Year	24hr Composite	June and Oct.
61428 - Chronic Toxicity, Pimephales promelas - TUc	-	-	-	-	-	-	-	2/Year	24hr Composite	June and Oct.
61941 - pH, Maximum - S.U.	9.0	-	-	-	-	-	-	1/Day	Continuous	All
61942 - pH, Minimum - S.U.	-	6.0	-	-	-	-	-	1/Day	Continuous	All
70300 - Residue, Total Filterable - mg/l	-	-	-	-	-	-	-	1/Week	24hr Composite	All
80082 - CBOD 5 day - mg/l	-	-	15	10	-	9936	6620	5/Week	24hr Composite	Summer
80082 - CBOD 5 day - mg/l	-	-	24	16	-	15897	10598	5/Week	24hr Composite	Winter

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 PARAGRAPHS 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
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- **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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