



DEQ

State of Oregon
Department of
Environmental
Quality

Information Required for Individual Wastewater NPDES Permit Readiness Review

Checklist to be completed by permit readiness team

Water Quality Permitting

Use this checklist to determine Individual NPDES permit readiness. Complete one readiness review for each individual permit

*Key documents required to complete this review - application, correspondence and permit

Reviewer name(s):	Legal permit name: Enter First	Common permit name:	Permit expiration date:	Readiness review start (date and time):		Planned permit issuance date:	Receiving water body
D. Feldman, J. Navarro	PERMAPOST PRODUCTS CO.	PERMAPOST	10/31/2015	5/24/2017	11:15:00 AM - 12:00 PM	TBD	Rock Creek
Permit number:	DEQ file number:	Application number:	EPA ID number:	Readiness review completion (date and time)		Complexity (see question #41)	303(d) Listed?
101489	68872	958180	OR0039594	5/24/2017	2:00 pm - 3:15 pm	3	Yes
Critical Issuance:	Permit type:	DEQ Region:	City:	County:		Basin:	Sub basin:
No	NPDES-IW-B21	NWR	HILLSBORO	WASHINGTON		Willamette	Tualatin
Indicate permit status and/or reasons for delay	administratively extended	Category for delay	Resource limitations		Reason for delay	Technical staff unavailable	

Readiness summary (to be completed by reviewer after checklist is completed): Permapost treats wood products on site. The current permit has many different provisions for everything from Arsenic to permethrin. The new application states that they only discharge stormwater and non-process cooling water. This needs to be verified given the complexity of the current permit. There is no documented MZ or study. The RPA sheets show that some RPAs were conducted end of pipe, while others allowed for ZID mixing with 2.5:1 dilution. The TMDLs need to be reviewed to determine if a WLA was assigned to Permapost. The facility will have to meet copper BLM sampling requirements. All of these issues really increase the complexity of this permit.

Readiness Score ((# of "action required" + Sum of estimated time rankings) * Complexity)

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Checklist quality review completed by project manager (sign and date): J. Navarro 5-31-17

Application Readiness

Verify that information is available and complete <small>*indicates critical step, proceed with readiness review</small>			Information available and complete	Permit Development impact	Estimate time required (enter if red)	Comment for action required (enter if red)
1	Industrial/Domestic wastewater NPDES permit renewal checklist complete?		No	No action		
2	Renewal application was submitted on time?		Yes	No action		
3	*EPA Form 2C NPDES Section V Part A, B and C monitoring requirements for each outfall Verify pollutants via TRI report, inspections, ELG's, major process changes		Yes	No action		
4	EPA Form 2E NPDES (For dischargers of non-process wastewater only)		N/A	No action		
5	EPA Form 2F NPDES (For dischargers of industrial storm water only)		N/A	No action		
6	EPA Form 2A (For POTW)		N/A	No action		
7	Oregon Form R (Renewal application national pollutant discharge elimination permit or EPA form 1 for new permits)		Yes	No action		
8	*Land Use Compatibility Statement (LUCS) Form that demonstrates compatibility with local and land use regulations (most current department signed and approved form is required)		Yes	No action		
9	Mixing Zone Study needed and/or available	Level of study	No	Action Required	3	Mixing Zone
10	Provide reasoning for not requiring a mixing zone:		There is no documented MZ or study. The RPA sheets show that some RPAs were conducted end of pipe, while others allowed for ZID mixing with 2.5:1 dilution.			
11	Mixing zone information is available (acute, chronic, dilution)		No	Action Required	3	Mixing Zone
12	Whole Effluent Toxicity (WET) Testing Results		No	No action		

13	Land Application Plan for Industrial Wastewater (Industrial permits only)	No	No action		
14	Solids or industrial residuals management plan is needed (industrial permits only)	No	No action		
15	Biosolids management plan (Domestic permits only)	N/A	No action		
16	Recycled water use plan (or update) is completed (Domestic permits only)	N/A	No action		
17	Site location map received and complete and latitude and longitude verified	No	Action Required	2	Facility Plan
18	Is the receiving water body 303(d) listed	Yes	Action Required	2	Data Analysis
19	List pollutants of concern that receiving body is listed for and user discharges:	Arsenic, DO, Iron, Lead			
20	*Effluent monitoring data for parameters associated with 303(d) listing are available	Yes	Action Required	2	Data Analysis
21	Is there a TMDL for the receiving water body	Yes	Action Required	2	TMDL
22	Ambient data for receiving water body are available (data may be from state database and/or user provided)	Yes	No action		
23	*Required data are available for all pollutants in discharge including data for effluent limitation guidelines or category listing	Yes	No action		
24	*Updated process flow diagram or schematic with complete water balance which includes inflow, outflow, location of flow meters, process uses and consumptive uses	No	Action Required	2	Facility Plan
25	Average flows available, maximum monthly flow, average 1 year flow, average 5 year flow ADD TO MWH TABLE	Yes	No action		
26	Design capacity available for domestic facilities ADD TO MWH TABLE	N/A	No action		
27	*Facility description (list processes and treatment systems) see EPA form 2C and/or Oregon form R question 1: ADD TO MWH TABLE	Yes	No action		
28	Five years of production data for industry with ELG related to production rate	Yes	Action Required	3	Administratively incomplete
29	*Excel spreadsheet of the last 3 years' effluent data including flow data (if no, indicate data format i.e. PDF, msWORD, Hardcopy):	No	Action Required	1	Data Format

Community/Facility Readiness

Verify that information is available and complete <small>*indicates critical information, proceed with readiness review</small>		Information available and complete	Permit development impact	Estimate time required (enter if red)	Comment for action required (enter if red)
30	Facility will likely need upgrades and/or permittee will have to take other significant action(s) during next permit term	No	No action		
31	If Yes to [30] List actions required:	N/A			

32	Mutual Agreement Order (MAO) with ELG and compliance schedule with interim limits	No	No action
33	Has compliance schedule in current permit with interim limits been satisfied	No	No action
34	Is it anticipated that a compliance schedule will be needed in next permit	No	No action
35	Significant financial burden on facility/community due to permit renewal	No	No action
36	Recommended consultation with regional solutions team, describe:	No	No action
37	Public Notice (340-045-0027(1)(d) and (3)):	Category 3	No action

Regulatory Readiness

Indicate regulatory impacts to permit development <small>*indicates critical impact, proceed with readiness review</small>		Regulation will impact permit development	Permit development impact	Estimate time required (enter if red)	Comment for action required (enter if red)
38	Facility discharges a 303(d) listed pollutant and has a TMDL with WLA for the pollutant receiving water body	Yes	Action Required	2	TMDL
39	*Facility discharges a 303(d) listed pollutant and mass load increase is requested for the listed pollutant	No	No action		
40	Facility is new and discharges a 303(d) listed pollutant	No	No action		
41	Permit will be significantly more complex compared to existing permit (e.g., includes trading, new standard/regulation, guidance, litigation) Rank 1-5	3			
42	There are outstanding complaint or compliance issues with facility (describe):	No	No action		

43	Active State or Federal agency actions - coordination with external agencies will be required i.e. tribal communities, 404/401 permit, biological opinion, NEPA, ESA (describe):	No	No action		
44	*Active criminal or civil enforcement (describe): The copper levels exceeded the permit limits in 2011	No	Action Required	2	enforcement
45	Groundwater review completed (if necessary)	Yes	Action Required	2	Facility Plan
46	Will additional monitoring data be required for domestic facilities per 40 CFR 122.21 (data missed due to new standards, missing from application, etc)	N/A	No action		
47	Will best professional judgement be used to develop permit limits	No	No action		
48	New WQ standards apply (i.e. copper BLM, Ammonia, etc.) and most recent version of RPA spreadsheet used. List new standards: copper	Yes	Action Required	2	WQ Standards – new standards