



**DEQ**

State of Oregon  
Department of  
Environmental  
Quality

# Information Required for Industrial Wastewater NPDES Permit Readiness Review

## Checklist to be completed by permit readiness team

### Water Quality Permitting

Use this checklist to determine Industrial 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
M. Wiren, K. Strohecker, M. Hynson, D. Feldman	BIO-OREGON PROTEIN, INC.	BIO-OREGON PROTEIN	11/30/2012	1/24/2017	1102	6/29/2017	Columbia River
Permit number:	DEQ file number:	Application number:	EPA ID number:	Readiness review completion (date and time)		Complexity (see question #40)	303(d) Listed?
101804	8477	963976	OR0000612	1/24/2017	1215	2	Yes
Critical Issuance:	Permit type:	DEQ Region:	City:	County:		Basin:	Sub basin:
No	NPDES-IW-B04	NWR	WARRENTON	CLATSOP		Northern Oregon Coastal	Lower Columbia
Indicate permit status and/or reasons for delay	administratively extended	Category for delay	Resource limitations		Reason for delay	High priority regional or statewide permitting project	
<p><b>Readiness summary (to be completed by reviewer after checklist is completed):</b> LUCS needs to be updated; Mixing Zone needed; Temperature issue is complicated; Current bacteria listing inappropriate for receiving water; Arsenic will be evaluated as a pollutant of concern for this permit; design and build an entire treatment system; reconfigure all of the outfalls, Data for production needs to be obtained from the permittee, DMR Hardcopies (9 years worth) need to be entered into an MS Excel spreadsheet. MAO required to meet new permit requirements with no officially documented violations. This new permit will be more stringent than the current permit that will cause significant burden to the permittee. Copper, ammonia, and arsenic will be added as pollutants of concern.</p>							
<p><b>Readiness Score ((# of "action required" + Sum of estimated time rankings) * Complexity)</b></p>						<p><b>106</b></p>	
<p>Checklist quality review completed by project manager (sign and date): Jeff Navarro 1/24/17</p>							

## 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?		Yes	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)		Yes	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	Action Required	1	LUCS	
9	Mixing Zone Study needed	Level of study	1	Yes	Action Required	3	Mixing zone
10	Provide reasoning for not requiring a mixing zone:		N/A				
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		N/A	No action			
14	Solids or industrial residuals management plan is needed		No	No action			

15	Biosolids management plan	N/A	No action		
16	Recycled water use plan (or update) is completed	N/A	No action		
17	Site location map received and complete and latitude and longitude verified	Yes	No action		
18	Is the receiving water body 303(d) listed	Yes	Action Required	2	WQ Standards – new standards
19	List pollutants of concern that receiving body is listed for and user discharges:	Temperature, fecal coliform, DDE, DDT, PCBs, Arsenic, Dioxin, TDG			
20	*Effluent monitoring data for parameters associated with 303(d) listing are available	Yes	No action		
21	Is there a TMDL for the receiving water body	Yes	No action		
22	Ambient data for receiving water body are available (data may be from state database and/or user provided)	No	Action Required	1	Technical assistance
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	No	Action Required	2	Facility plan
25	Average flows available, maximum monthly flow, average 1 year flow, average 5 year flow	No	Action Required	1	Effluent data
26	Design capacity available for domestic facilities	N/A	No action		
27	*Facility description (list processes and treatment systems) see EPA form 2C and Oregon form R question 1: nothing	Yes	Action Required	3	Facility plan
28	Five years of production data for industry with ELG related to production rate	No	Action Required	1	Effluent data
29	*Excel spreadsheet of the last 3 years' effluent data including flow data (if no, indicate data format i.e. PDF, msWORD, Hardcopy): DMR hardcopies	No	Action Required	2	Data format
<b>Community/Facility Readiness</b>					
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	Yes	Action Required	2	Compliance work

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If Yes to [30] List actions required:

design and build an entire treatment system; reconfigure all of the outfalls

32	Mutual Agreement Order (MAO) with ELG and compliance schedule with interim limits	Yes	Action Required	2	Enforcement
33	Has compliance schedule in current permit with interim limits been satisfied	N/A	No action		
34	Is it anticipated that a compliance schedule will be needed in next permit	Yes	Action Required	2	Compliance schedule
35	Significant financial burden on facility/community	Yes	Action Required	2	Technical assistance
36	Recommended consultation with regional solutions team, describe: This new permit will be more stringent than the current permit that will cause significant burden to the permittee.	Yes	Action Required	2	Technical assistance
37	<a href="#">Public Notice (340-045-0027(1)(d) and (3))</a> :	Category 3	Action Required	2	Public comment

### 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	No	No action		
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	Yes		2	Compliance schedule
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., 404/401 permit, biological opinion, NEPA, ESA (describe):	Yes	Action Required	2	compliance schedule
44	*Active criminal or civil enforcement (describe):	No	No action		
45	Groundwater review completed (if necessary)	No	No action		
46	Will additional monitoring data be required for domestic facilities per 40 CFR 122.21(e)	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.) list: copper, ammonia, arsenic	Yes	Action Required	2	Data analysis