



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, M. Wiren, J. Navarro, M. Hynson	RSG FOREST PRODUCTS, INC.	OLYMPIC FOREST PRODUCTS	1/31/2011	3/14/2017	15:06	6/30/2018	Nehalem River
Permit number:	DEQ file number:	Application number:	EPA ID number:	Readiness review completion (date and time)		Complexity (see question #41)	303(d) Listed?
102858	110362	969517	OR0034517	3/14/2017	16:10	5	Yes
Critical Issuance:	Permit type:	DEQ Region:	City:	County:		Basin:	Sub basin:
No	NPDES-IW-B19	NWR	CLATSKANIE	COLUMBIA		Northern Oregon Coastal	Nehalem
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): This is an extremely complex permit for a discharge of saw blade cooling water. Permittee was asked to collect ambient data, and failed to do so. The mixing zone study needs to be updated with the correct information. Existing permit based upon permittee's consultant determination that fundamentally different factors apply to exlude the permittee from ELGs - exlcusions expired in 1989 (current permit is wrong on this exclusion).							
Readiness Score ((# of "action required" + Sum of estimated time rankings) * Complexity)						305	
Checklist quality review completed by project manager (sign and date): Jeff Navarro 3/14/2017							

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)		No	Action Required	1	LUCS
9	Mixing Zone Study needed and/or available	Level of study	Yes	Action Required	2	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	Action Required	2	WET
13	Land Application Plan for Industrial Wastewater		No	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	1	Data Analysis
19	List pollutants of concern that receiving body is listed for and user discharges:	DO, temperature			
20	*Effluent monitoring data for parameters associated with 303(d) listing are available	No	Action Required	3	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)	No	Action Required	3	Data Analysis
23	*Required data are available for all pollutants in discharge including data for effluent limitation guidelines or category listing	Yes	Action Required	3	Data Analysis
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	3	Facility plan
25	Average flows available, maximum monthly flow, average 1 year flow, average 5 year flow	Yes	No action		
26	Design capacity available for domestic facilities	N/A	No action		
27	*Facility description (list processes and treatment systems) see EPA form 2C and/or Oregon form R question 1:	Yes	No action		
28	Five years of production data for industry with ELG related to production rate	No	No action		
29	*Excel spreadsheet of the last 3 years' effluent data including flow data (if no, indicate data format i.e. PDF, msWORD, Hardcopy): Disk w/Excel	Yes	No action		

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	Yes	Action Required	4	Compliance schedule
31	If Yes to [30] List actions required:	Determine upgrades, outreach and coordination with permittee, agree to compliance schedule to design and construct upgrades			

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	Yes	Action Required	4	Compliance schedule
35	Significant financial burden on facility/community due to permit renewal	Yes	Action Required	3	Economic-community impact
36	Recommended consultation with regional solutions team, describe:	Yes	Action Required	3	Economic-community impact
37	Public Notice (340-045-0027(1)(d) and (3)):	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	Yes	Action Required	2	Data analysis
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	N/A	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	5			
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):	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 (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 BLM	Yes	Action Required	3	Data Analysis