

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 | |
|---|--------------|-------------|---|-----------|---|------------------|-------------------------------|----------------------|---------------------|
| J. Navarro, D. Feldman | WILLAMIN | IA, CITY OF | WILL | AMINA STP | 11/30/2015 | 9/8/2017 | 1:44 PM | TBD | South Yamhill River |
| Permit number: DEQ file number: | | number: | Application number: EPA ID number: | | Readiness review completion (date and time) | | Complexity (see question #41) | 303(d) Listed? | |
| 101070 | 101070 97397 | | 95 | 57786 | OR0022713 | 9/8/2017 | 14:41 | 3 | yes |
| Critical Issuance: Permit type | | t type: | DEQ | Region: | City: | Cou | nty: | Basin: | Sub basin: |
| No | NPDES-I | OOM-Db | | WR | WILLAMINA | YAMHILL | | Willamette | Yamhill |
| Indicate permit status and/or reasons for delay | | | stratively Category for delay | | Resource limitations | Reason for delay | | Technical staff | unavailable |

Readiness summary (to be completed by reviewer after checklist is completed): Flow and temperature results are missing from form 2A section A.12, Section B.6 results are also missing; Permit writer should review the biosolids mangement plan; mixing zone study (2010) should be reviewed; warning letter (WL-WRS-2014-130) for failure to complete required monitoring, warning letter (2015-WLOTC-649) for failure to calculate limits appropriately;

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

135

Checklist quality review completed by project manager (sign and date): D. Feldman 9/11/17

... 0/44/47

| Application Readiness | | | | | | | |
|-----------------------|--|--|---------------------------------|---|--|--|--|
| | Verify that information is available and complete *indicates critical step, proceed with readiness review | 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? | no | 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 | no | no action | | | | |
| 4 | EPA Form 2E NPDES (For dischargers of non-process wastewater only) | no | no action | | | | |
| 5 | EPA Form 2F NPDES (For dischargers of industrial storm water only) | no | no action | | | | |
| 6 | EPA Form 2A (For POTW) | yes | action required | 3 | Administratively incomplete | | |
| 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 Level of availble study | yes | action required | 1 | mixing zone | | |
| 10 | Provide reasoning for not requiring a mixing zone: | n/a | | | | | |
| 11 | Mixing zone information is available (acute, chronic, dilution) | yes | action required | 1 | mixing zone | | |
| 12 | Whole Effluent Toxicity (WET) Testing Results | no | no action | | | | |
| 13 | Land Application Plan for Industrial Wastewater (Industrial permits only) | n/a | no action | | | | |

| | _ | | | | | | |
|-----|---|--|-----------------|---|---------------|--|--|
| 14 | Solids or industrial residuals management plan is needed (industrial permits only) | n/a | no action | | | | |
| 15 | Biosolids management plan (Domestic permits only) | yes | action required | 2 | facility plan | | |
| 16 | Recycled water use plan (or update) is completed (Domestic permits only) | no | 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 | data analysis | | |
| 19 | List pollutants of concern that receiving body is listed for and user discharges: | fecal coliform, flow n lead, phosphorous, t | | | | | |
| 20 | *Effluent monitoring data for parameters associated with 303(d) listing are available | no | action required | 2 | data analysis | | |
| 21 | Is there a TMDL for the receiving water body | yes | action required | 3 | TMDL | | |
| 22 | Ambient data for receiving water body are available (data may be from state database and/or user provided) | yes | action required | 2 | data analysis | | |
| 23 | *Required data are available for all pollutants in discharge including data for effluent limitation guidelines or category listing | no | action required | 2 | 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 | yes | no action | | | | |
| 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 | yes | 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 | n/a | 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): | no | action required | 2 | data format | | |
| Com | nunity/Facility Readiness | | | | | | |

| | Verify that information is available and complete *indicates critical information, proceed with readiness review | Information available and complete | Permit development impact | Estimate time required (enter if red) | Comment for action required (enter if red) |
|----|---|--|---------------------------------|---|--|
| | 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 | n/a | 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 | | |
| Regul | atory Readiness | | | | |
| | Indicate regulatory impacts to permit development *indicates critical impact, proceed with readiness review | 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 | 3 | 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 | 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 | 3 | | | |
| 42 | There are outstanding complaint or compliance issues with facility (describe): warning letters | yes | action required | 1 | enforcement |

| 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): see 42 | 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) | yes | action required | 3 | data analysis |
| 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: ammonia, Hg | yes | action required | 2 | WQ Standards – new standards |