



**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
David Cole, Steve Schnurbusch, Jeff Navarro	COVANTA MARION, INC	COVANTA MARION, INC	11/30/2009	2/6/2017	1108	3/31/2017	Willamette River
Permit number:	DEQ file number:	Application number:	EPA ID number:	Readiness review completion (date and time)		Complexity (see question #41)	303(d) Listed?
101240	89638	971350	OR0031305	2/6/2017	1133	3	Yes
Critical Issuance:	Permit type:	DEQ Region:	City:	County:		Basin:	Sub basin:
No	NPDES-IW-B16	WR	BROOKS	MARION		Willamette	Middle Willamette
Indicate permit status and/or reasons for delay	administratively extended	Category for delay	Permitting process – external factor		Reason for delay	WQ Standards – new standards	
<b>Readiness summary (to be completed by reviewer after checklist is completed):</b> permittee needs to deliver Cu data for analysis with new WQ standards for Cu; multiple reasons for delay up to this point including additional public comment, resource limitations, competing priorities; facility RP for copper will determine any necessary upgrades or additional compliance procedures; WLA is included as part of the "Willamette Bubble" (temperature);							
<b>Readiness Score ((# of "action required" + Sum of estimated time rankings) * Complexity)</b>						48	
<b>Checklist quality review completed by project manager (sign and date):</b>							

## 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)		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	action required	1	lucs
9	Mixing Zone Study needed	Level of study	1	Yes	no action	
10	Provide reasoning for not requiring a mixing zone:					
11	Mixing zone information is available (acute, chronic, dilution)		Yes	no action		
12	Whole Effluent Toxicity (WET) Testing Results		yes	no action		
13	Land Application Plan for Industrial Wastewater		yes	no action		

14	Solids or industrial residuals management plan is needed	n/a	no action		
15	Biosolids management plan	n/a	no action		
16	Recycled water use plan (or update) is completed	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	no action		
19	List pollutants of concern that receiving body is listed for and user discharges:	DO, aldrin, DDE, DDT, dieldrin, iron, PCB, Dioxin, e. coli, mercury, temperature, flow modification, Lead			
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	2	WQ Standards – new standards
23	*Required data are available for all pollutants in discharge including data for effluent limitation guidelines or category listing	no	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	yes	no action		
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 Oregon form R question 1:	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):	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	<b>Facility will likely need upgrades and/or permittee will have to take other significant action(s) during next permit term</b>	yes	action required	3	Data analysis
31	<b>If Yes to [30] List actions required:</b>	collect copper data and determine RP;			

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	2	compliance schedule
35	Significant financial burden on facility/community	no	no action		
36	Recommended consultation with regional solutions team, describe:	no	no action		
37	<a href="#">Public Notice (340-045-0027(1)(d) and (3)):</a>	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	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	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):	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):	no	no action		
44	*Active criminal or civil enforcement (describe):	no	no action		
45	Groundwater review completed (if necessary)	n/a	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	yes	action required	3	WQ Standards – new standards