



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 | ROSBORO COMPANY, LLC | ROSBORO, SPRINGFIELD FACILITY | 6/30/2012 | 8/9/2017 | 11:42:00 AM - 12:00 PM | TBD | Patterson Slough |
| Permit number: | DEQ file number: | Application number: | EPA ID number: | Readiness review completion (date and time) | | Complexity (see question #41) | 303(d) Listed? |
| 101467 | 76385 | 965831 | OR0026999 | 8/9/2017 | 1:10:00 PM - 2:00 PM | 2 | No |
| Critical Issuance: | Permit type: | DEQ Region: | City: | County: | | Basin: | Sub basin: |
| No | NPDES-IW-B20 | WR | SPRINGFIELD | LANE | | Willamette | Upper Willamette |
| 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): The Rosboro Facility manufactures wood products and only discharges non-process wastewater from different processes onsite. They have treatment for temperature by holding it in a pond in the summer. There are three permit violations for TSS, and one for pH. | | | | | | | |
| Readiness Score ((# of "action required" + Sum of estimated time rankings) * Complexity) | | | | | | 22 | |
| Checklist quality review completed by project manager (sign and date): J. Navarro 8/14/17 | | | | | | | |

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 | | N/A | No action | | |
| 4 | EPA Form 2E NPDES (For dischargers of non-process wastewater only) | | Yes | 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 | No | No action | | |
| 10 | Provide reasoning for not requiring a mixing zone: | | Limits set end of pipe | | | |
| 11 | Mixing zone information is available (acute, chronic, dilution) | | No | No action | | |
| 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) | No | No action | | |
| 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 | No | No action | | |
| 19 | List pollutants of concern that receiving body is listed for and user discharges: | N/A | | | |
| 20 | *Effluent monitoring data for parameters associated with 303(d) listing are available | N/A | No action | | |
| 21 | Is there a TMDL for the receiving water body | No | 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 | Ambient Data |
| 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 | 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 | 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 | 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): Hardcopy | No | Action Required | | |

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 | Yes | 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 | 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 | 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 | 2 | | | |
| 42 | There are outstanding complaint or compliance issues with facility (describe): Several warning letters for TSS violations. Including WL - WQ/IWRE 2011-0023, WL - WRE-WQ/I- 2013-002, and 2017-WLOTC-2818. They also violated the pH limit and received a warning violation for that as well (see WL-WQ/I WRE 2010-0050) | Yes | Action Required | 2 | 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): | 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) | No | No action | | |
| 47 | Will best professional judgement be used to develop permit limits | Yes | 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 | Yes | Action Required | 1 | WQ Standards – beneficial use |