



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
J. Navarro, D. Feldman	(eugene) GEORGIA-PACIFIC CHEMICALS LLC	GEORGIA-PACIFIC CHEMICALS LLC	10/31/2001	9/5/2017	1:45 PM	TBD	Amazon Creek
Permit number:	DEQ file number:	Application number:	EPA ID number:	Readiness review completion (date and time)		Complexity (see question #41)	303(d) Listed?
101474	32864	987795	OR0002101	9/5/2017	14:34	4	yes
Critical Issuance:	Permit type:	DEQ Region:	City:	County:		Basin:	Sub basin:
No	NPDES-IW-B16	WR	EUGENE	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): Application materials submitted on form 2C are very old, new information should be requested which will add to time and complexity of permit renewal; it appears that the permit was drafted in 2001 but was never issued; Fact sheet on file appears to be the drafted fact sheet for the renewal permit; compliance schedule requires submission of a hydrogeologic characterization plan, this was not available for review; current limits are set end of pipe, mixing zone study may be required for new limits; receiving water body is listed as "unnamed tributary of Amazon Creek", permit writer will need to evaluate receiving water body and potential 303(d) listings; Phenol spill to storm water (2012) ENF-WRE-0042-2012, Phenol exceedance (2013) PEN-WRE-2013-0014, civil penalty (2013) for Phenol spill;

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

288

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

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?		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		yes	action required	3	data analysis
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	action required	2	Administratively incomplete
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 are end of pipe			
11	Mixing zone information is available (acute, chronic, dilution)		no	no action		
12	Whole Effluent Toxicity (WET) Testing Results		yes	action required	3	data analysis
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)	n/a	no action		
16	Recycled water use plan (or update) is completed (Domestic permits only)	n/a	no action		
17	Site location map received and complete and latitude and longitude verified	yes	action required	1	Administratively incomplete
18	Is the receiving water body 303(d) listed	yes	action required	3	data analysis
19	List pollutants of concern that receiving body is listed for and user discharges:	listings for Amazon creek: Arsenic, copper, dichloroethylenes, DO, e. coli, lead, tetrachloroethylene, trichloroethylene,			
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	3	TMDL
22	Ambient data for receiving water body are available (data may be from state database and/or user provided)	yes	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	1	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	action required	1	facility plan
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	no	action required	2	Administratively incomplete
28	Five years of production data for industry with ELG related to production rate	no	action required	2	data analysis

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
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	action required	1	Economic-community impact
31	If Yes to [30] List actions required:	Unsure, lack of data			

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	action required	1	compliance schedule
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	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	4			
42	There are outstanding complaint or compliance issues with facility (describe): potential compliance issues with Phenol discharges/limits	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): see 42	yes	action required	2	enforcement
45	Groundwater review completed (if necessary)	yes	action required	2	data analysis
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	4	data analysis
47	Will best professional judgement be used to develop permit limits	yes	action required	2	data analysis
48	New WQ standards apply (i.e. copper BLM, Ammonia, etc.) and most recent version of RPA spreadsheet used. List new standards: copper, Hg, ammonia	yes	action required	2	WQ Standards – new standards