



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	BROOKINGS, CITY OF	BROOKINGS WWTP	10/31/2016	9/5/2017	10:15 AM	TBD	Pacific Ocean
Permit number:	DEQ file number:	Application number:	EPA ID number:	Readiness review completion (date and time)		Complexity (see question #41)	303(d) Listed?
101773	11297	955051	OR0020354	9/5/2017	11:55 PM	4	No
Critical Issuance:	Permit type:	DEQ Region:	City:	County:		Basin:	Sub basin:
No	NPDES-DOM-C2a	WR	BROOKINGS	CURRY		Southern Oregon Coastal	Chetco
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 permit is categorized in WQSYS as "Sewage disposal - At least 1 MGD but less than 2 MGD." This needs to be updated because the design capacity is 15.5 MGD. Warning Letters were issued in 2016 for: Fecal Coliform violations (2016-WL-1444), pH violation (2016-WL-1893), fecal coliform and Enterococci violations (2016-WL-2006), TSS mass load limit violation (2016-WL-2117). The application stated that the range of pH values was 6.0-9.0. The warning letter for pH was for a measured value of 5.8. The maximum daily fecal coliform and TSS values on the application were incorrect. The application data needs to be reviewed and verified by the permittee. The application is missing effluent data for : Ammonia, DO, TKN, N&N, O&G, TP, and TDS. The City of Brookings operates a major facility. The mixing zone was completed in 1991. The follow-up memo was drafted in 2007. This may need to be reevaluated; There was a requirement for a biosolids plan in the 2011 permit. No evidence of the plan in the available files; There are recycled water provisions in the permit without any mention of a plan. The dry and wet weather design flows are not documented. The river mile needs to be updated using the same process to do the 303(d) list. From Renai Nomura on 10-6-17 there will be a MAO for operating under the old permit. hold off on permit renewal until compliance issues are sorted out, permit to stay with Any Ulrich until further notice;

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

128

Checklist quality review completed by project manager (sign and date):

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		N/A	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)		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 available	Level of study	1	Yes	Action Required	1	Mixing Zone
10	Provide reasoning for not requiring a mixing zone:		The 2007 MZ zone should be reviewed and updated as needed				
11	Mixing zone information is available (acute, chronic, dilution)		Yes	Action Required	1	Mixing Zone	
12	Whole Effluent Toxicity (WET) Testing Results		Yes	Action Required	2	WET	
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)	No	Action Required	1	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	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		
23	*Required data are available for all pollutants in discharge including data for effluent limitation guidelines or category listing	N/A	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	N/A	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):	Yes	No action		

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	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 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			4	

42	There are outstanding complaint or compliance issues with facility (describe): Warning Letters were issued in 2016 for: Fecal Coliform violations (2016-WL-1444), pH violation (2016-WL-1893), fecal coliform and Enterococci violations (2016-WL-2006), TSS mass load limit violation (2016-WL-2117).	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	Action Required	2	Facility Plan
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: Copper, Ammonia	Yes	Action Required	2	WQ Standards – new standards