

IPDES Guidance Development Meeting #9



July 19, 2016



IPDES Documents

- **IPDES Compliance Monitoring Strategy**
 - Final posted to IPDES Guidance webpage
- **IPDES Program Description**
 - Open for 30-day comment period

User's Guide to Permitting and Compliance

Volume 1 – General Information

1. Introduction
2. CWA, NPDES, and IPDES Program
3. Permit Descriptions By Type and Sector
4. Individual Permit Application Process
5. Individual Permit Development Process
6. General Permit Development Process
7. Permit Modification, Revocation, Reissuance, Termination and Transfer
8. Variances, Waivers, and Intake Credits
9. Compliance Monitoring Activities
10. Enforcement
11. Appeals, Stays, and Contested Conditions

Glossary

Appendix A – 2016 NPDES Permits in Idaho

Appendix B – IPDES Permit Rating Work Sheet

Appendix C – Outline of IPDES IP Permit Development and Issuance

Appendix D – Outline of IPDES GP Permit Development and Issuance

-Revisions- Entire Document

- **Committee discussion**
 - **Changes based on June committee meeting**
 - **Written comments received**
 - **AIC**
 - **EPA**

Public Comments

- **IPDES User's Guide – Volume 1**
 - Comments due by COB, July 26

- **IPDES Program Description**
 - Comments due by COB, August 11

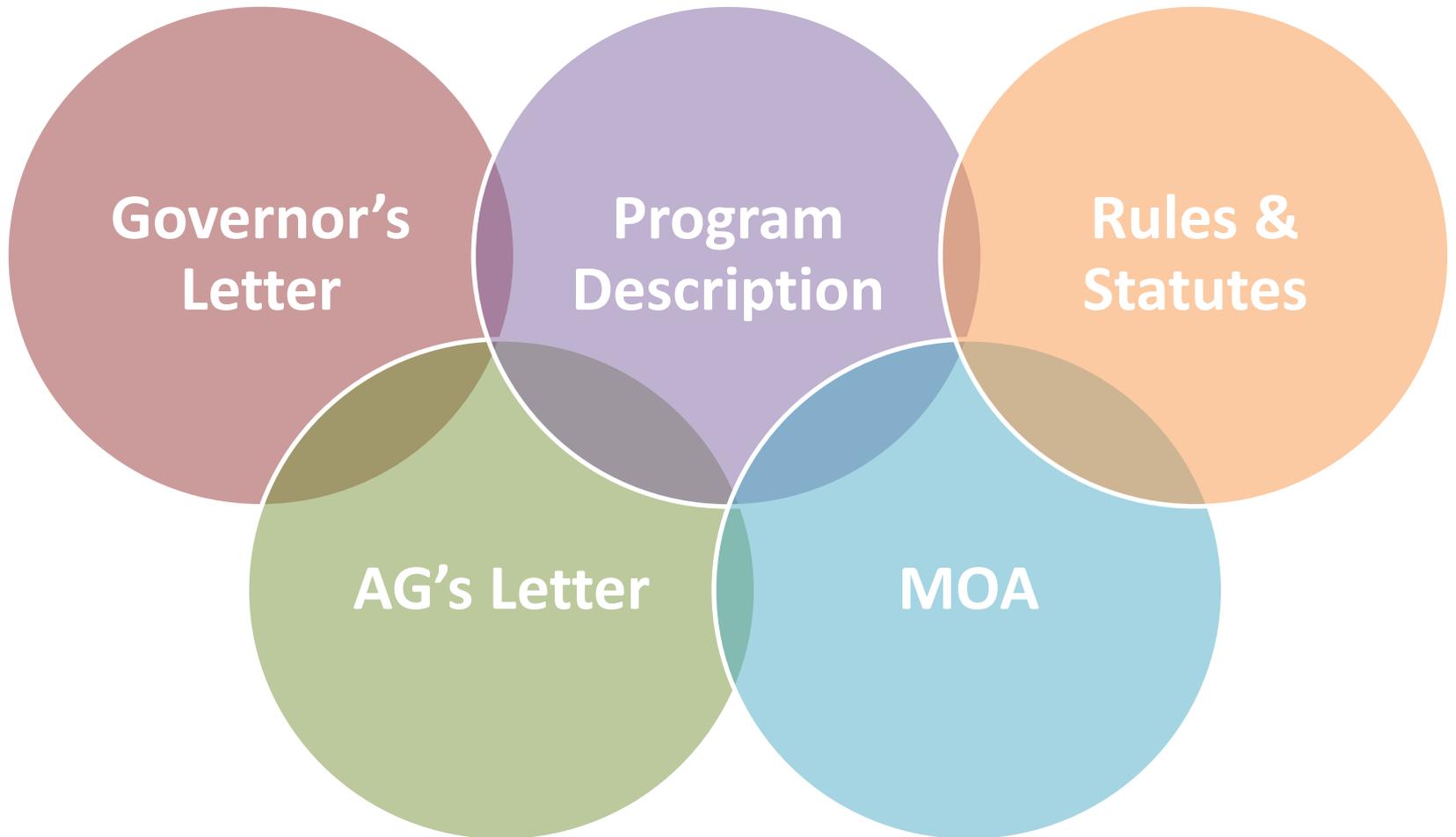
IPDESGuidance@deq.idaho.gov

August 23rd Meeting

- **Final User's Guide Volume 1**
- **IPDES Application Package**
- **IPDES Guidance – next steps**



Application Components



Current Efforts

Application Component	Status
Governor's Letter	Drafting
Rules/Statutes	Completed
AG's Letter	Drafted, in review
MOA	Drafted, posted, in review
Program Description	Drafted, posted, in review

Federal Requirement

- **40 CFR 123.22**
 - Narrative description of scope, structure, coverage, and processes
 - Description of the organization and structure of the state agency
 - Description of applicable procedures including permitting and administrative or judicial review
 - Complete description of the state's compliance tracking and enforcement program
 - Compliance with eReporting rule

Federal Requirement

- **40 CFR 123.22**
 - **Narrative description of scope, structure, coverage, and processes (Section 2)**
 - Description of the organization and structure of the state agency
 - Description of applicable procedures including permitting and administrative or judicial review
 - Complete description of the state's compliance tracking and enforcement program
 - Compliance with eReporting rule

Federal Requirement

- **40 CFR 123.22**
 - Narrative description of scope, structure, coverage, and processes (Section 2)
 - Individual and general permits
 - Storm water
 - Sewage sludge
 - Pretreatment

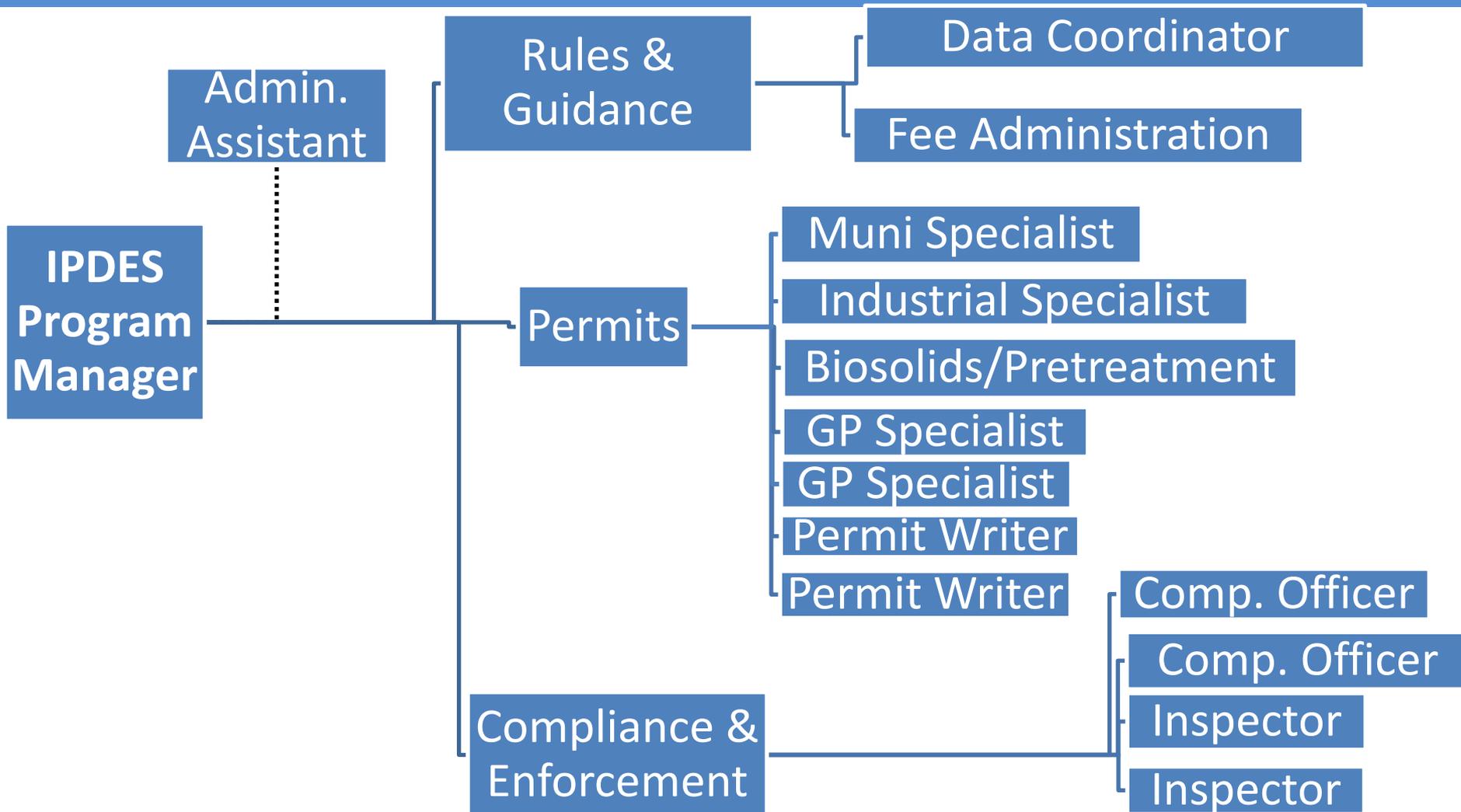
Federal Requirement

- **40 CFR 123.22**
 - Narrative description of scope, structure, coverage, and processes (Section 2)
 - **Description of the organization and structure of the state agency (Sections 3 – 5)**
 - Description of applicable procedures including permitting and administrative or judicial review
 - Complete description of the state's compliance tracking and enforcement program
 - Compliance with eReporting rule

Organization and Structure

Activity	Hours	Number of FTEs
Permitting	12,728	7.1
CIE	26,023	14.6
Administration	11,596	6.5
Legal ^a	1746	1.0
Total	52,093	29.2

Organization and Structure



Budget and Funding

Fiscal Year	2019	2020	2021	2022	2023
			(\$)		
Personnel	2,540,300	2,839,400	2,839,400	2,839,400	2,839,400
Travel	37,000	37,000	28,000	28,000	28,000
Contractual ^a	140,100	140,100	140,100	140,100	140,100
Supplies	23,300	22,100	14,000	14,000	14,000
Equipment	13,000	13,000	13,000	13,000	13,000
Total cost	2,753,700	3,051,600	3,034,500	3,034,500	3,034,500

Budget and Funding

Fiscal Year (Phase)	Fees collected	Est. Invoices	Gen Fund ongoing	Gen Fund (1-Time)	Federal
		(\$)			
2019(1)	None	0	2,000,000	585,700	168,000
2020(2)	Muni	653,043	2,000,000	198,800	168,000
2021(3)	Muni and Industrial	901,034	2,000,000	0	168,000
2022(4)	Muni and industrial	901,034	2,000,000	0	168,000
2023(5) ^a	All phases	1,368,224	2,000,000	0	168,000

Budget and Funding

Sector	# Covered	Receipts
Municipal	375,312 EDUs	\$653,043
Industrial	44 Facilities	\$247,991
Industrial Storm Water	277 NOI 115 No Exp.	\$289,322
Construction Storm Water	573 NOI 80 Waiver	\$177,868
Total receipts		\$1,368,224

Federal Requirement

- **40 CFR 123.22**
 - Narrative description of scope, structure, coverage, and processes (Section 2)
 - **Description of the organization and structure of the state agency (Program Analysis Appendix C)**
 - Provides detailed analysis of resource needs
 - Describes inputs to resource model
 - Describes State agency staff working in the program, including the number, occupations, and general duties of the employees

Federal Requirement

- **40 CFR 123.22**

- Narrative description of scope, structure, coverage, and processes (Section 2)
- Description of the organization and structure of the state agency (Sect 3 – 5 Program Analysis Appendix C)
- **Description of applicable procedures including permitting and administrative or judicial review (Sections 6 – 10)**
- Complete description of the state's compliance tracking and enforcement program
- Compliance with eReporting rule

Permitting

- Procedures for all permits
- Procedures for individual permits
- Procedures for general permits
- Application review
- Public participation
- Appeals



Pretreatment regulations

- Applications
- Control authority
- Local limits
- Variances
- Removal credits
- Categorical determinations
- Public participation
- Reporting

Avoid the Clog... 

Keep out the F_{ats} O_{il} G_{rease}

 ✓ Scrape Grease from pots, pans, and utensils.

 ✓ Wipe cooking tools with a paper towel before washing.

 ✓ Clean out grease traps regularly.

Don't wash Fats, Oils, Grease or food scraps down the drain.

www.cityofmarietta.com/department/worksheets/MSD-968

Sewage Sludge

- Disposal in landfills
- Permitting for sewage sludge facilities
- Land application of septage and sludge
- Reporting



Storm Water

- **Construction**
 - NOI
 - Waivers and NOTs
 - Compliance
- **Industrial**
 - NOI
 - Waivers and NOT
 - Compliance
- **Municipal**
- **Public Outreach**



CAFO

- Rules
- Coverage
- Compliance
- Reporting
- MOU



Federal Requirement

- **40 CFR 123.22**

- Narrative description of scope, structure, coverage, and processes (Section 2)
- Description of the organization and structure of the state agency (Sect 3 – 5 Program Analysis Appendix C)
- Description of applicable procedures including permitting and administrative or judicial review (Sections 6 – 10)
- **Complete description of the state's compliance tracking and enforcement program (section 11 - 12, Appendix G & H)**
- Compliance with eReporting rule

Compliance Evaluation

- **Monitoring**
 - Procedures
 - Inspections
- **Assistance**
- **Incentives**



Enforcement

- Response
- Administrative actions
- Civil and criminal actions
- Penalties
- Reporting
- Public participation



Enforcement Actions

Facilities with Enforcement Actions (Formal/Informal) ▼

Facilities with Enforcement Actions (All)



Federal Requirement

- **40 CFR 123.22**

- Narrative description of scope, structure, coverage, and processes
- Description of the organization and structure of the state agency
- Description of applicable procedures including permitting and administrative or judicial review
- Complete description of the state's compliance tracking and enforcement program (section 11 - 12, Appendix G & H)
- **Compliance with eReporting rule (Section 13)**

Data Management

- **Data management system (CRIPS)**
- **Web-based system**
- **Data exchange**
- **Quality assurance**

What the Future will look like



Department of Environment Quality
IPDES Web Application

Idaho Pollutant Discharge Elimination System Program(IPDES) E-Permitting System

Welcome to the IPDES electronic permitting system. This system allows users to submit permit applications and reports. In addition, it is expected that by 2022 users will be able to query, view, and download a wide range of IPDES information including discharge locations (outfalls), discharge monitoring reports (DMRs), and other permit, inspection, violation, and enforcement related documents.

We recommend that new applicants and existing permittees contact IPDES permit staff prior to completing an electronic application, especially if the facility or activity is a new proposed discharger. DEQ has multiple options for permitting the discharge or reuse treated wastewater. Contact the appropriate [DEQ Regional Office](#) to schedule a meeting.

Reporting: The Reporting option allows users to electronically submit annual reports, noncompliance reports, and other documentation that may be required for a specific permit. Submitting a notice of termination for an existing permit is also possible through the Reporting option.

Permits: The Permits option allows users to submit individual permit applications and Notices of Intents for general permits. Low Erosivity Waivers and Certificate of No Exposure applications are also available in the Permits section.

Facilities: The Facilities option allows facility signatories and designated representatives to update facility information

Login to your Account



[Forgot password?](#)

[Register](#)

Remember me

[Login](#)

What the Future will look like



Facility: ▼

[Home](#) / [Permit](#) / [Application](#)

Permit (New)

Basic Information

Collection System and Flow

Discharge & Disposal

Contractor Information

Wastewater Discharges

Collection System and Flow

Provide information on municipalities and areas served by the facility. Provide the name and population of each entity and, if known, provide information on the type of collection system (combined vs. separate) and its ownership (municipal, private, etc). [Add Additional Collection System](#)

Name of the Municipality or Service Area	Population Served	Equivalent Dwelling Units(EDU)	Type of Collection System	Ownership	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="▼"/>	<input type="text" value="▼"/>	

Flow

Indicate the design flow rate of the treatment plant. Also provide the average daily flow rate and maximum daily flow for each of the last three years. Each year's data must be based on a 12-month time period with the 12th month of "this year" occurring no more than three months prior to the application submittal.

Design flow rate: mgd

Is this a new facility?

Yes No

Flow Rate	2 Years Ago	Last Year	This Year
Annual Average daily flow rate	<input type="text"/> mgd	<input type="text"/> mgd	<input type="text"/> mgd
Maximum daily flow rate	<input type="text"/> mgd	<input type="text"/> mgd	<input type="text"/> mgd

Application Approval Process

- **Completeness Review**
- **Public Comment**
- **Consultation**
- **MOA finalization**