



Avoiding NPDES Permitting & Compliance Mistakes



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Avoiding NPDES Permitting & Compliance Mistakes

- Preparing the permit application
- Reviewing the draft permit
- Complying with the permit



<https://www.epa.gov/aboutepa/epa-region-5>

Preparing the Permit Application

- Strategy and desired outcome
- Review the current permit
- Review sampling data, monitoring reports and studies
- Review agency correspondence, inspection notes, violations and corrective actions

Preparing the Permit Application

- New regulations
- Industry group resources
- Review permits for similar industries or facilities
- Review facility operations
- Review construction schedule

Preparing the Permit Application

- Sampling for primary industries
- Reasonable potential analysis
- Production data
- Conduct additional sampling
- Discharges that could be eliminated or rerouted
- Supplemental information

Reviewing the Draft Permit

- Request pre-public notice copy of permit
- Resolve outstanding issues before public comment
- Review and understand the derivation of permit limits
- Correct understanding of your operations
- Have operations changed since submittal of the application?
- Errors and typos

Compliance with the Permit

- Day 1 compliance plan
- Inspections
- Recordkeeping
- Reporting requirements
- Compliance schedules
- Pollutant minimization plans
- Training

Compliance with the Permit

- Internal and third party laboratories
- Analytical methods, detection limits, hold times
- QA/QC
 - Lab data
 - DMR report submittal
 - Correspondence to the agency
- Update Storm Water plan, other contingency plans

Conclusion

- Identify the team, assign roles
- Start early
- Strategy and desired outcome
- Meeting with the agency
- Request a pre-public notice copy of the permit
- Prepare a Day 1 compliance plan
- QA/QC of all agency submittals

Questions, Thanks & Contact Information

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