

IPDES Guidance Topic List (Working Outline)

User's Guide Volume I	Volume II or Other Guidance	Guidance Topics
✓		Idaho Pollutant Discharge Elimination System (IPDES) Program Overview
✓		History of Clean Water Act (CWA) and IPDES Program
✓		Individual Permit Types (Description of Permit Types)
✓		<ul style="list-style-type: none"> • Description of major/minor categories
✓		<ul style="list-style-type: none"> • Domestic sewage facility (publicly owned treatment works (POTW) and private)
✓		<ul style="list-style-type: none"> • Industrial
✓		<ul style="list-style-type: none"> • Municipal separate storm sewer systems (MS4)
✓		General Permit Types (Description of Permit Types)
✓	✓	<ul style="list-style-type: none"> • Concentrated aquatic animal production (CAAP) (Note: DEQ already has a guidance document for aquaculture facilities)
✓		<ul style="list-style-type: none"> – Total maximum daily load (TMDL) and non-TMDL limited receiving waters
✓		<ul style="list-style-type: none"> – Inactivation and reactivation of permits (aquaculture)
✓		<ul style="list-style-type: none"> – Fish processing facilities
✓		<ul style="list-style-type: none"> • Ground water remediation general permit (GP)
✓		<ul style="list-style-type: none"> • Small suction dredging GP
✓		<ul style="list-style-type: none"> • Drinking water GP
✓		<ul style="list-style-type: none"> • Pesticide GP
✓		<ul style="list-style-type: none"> • Construction GP
✓		<ul style="list-style-type: none"> • Multisector GP
✓		<ul style="list-style-type: none"> • MS4
✓		<ul style="list-style-type: none"> – Single GP for state
✓		<ul style="list-style-type: none"> – Minimum control measures
✓		<ul style="list-style-type: none"> – Public notice and audits
✓		<ul style="list-style-type: none"> – Next generation permits
✓		<ul style="list-style-type: none"> • Concentrated animal feeding operation (CAFO) (Note: some guidance already exists via Idaho State Department of Agriculture, US Natural Resources Conservation Service for nutrient management plans)
✓		<ul style="list-style-type: none"> • Vessel GP

User's Guide Volume I	Volume II or Other Guidance	Guidance Topics
✓		<ul style="list-style-type: none"> • Other GPs
✓		<ul style="list-style-type: none"> – Hydroelectric facilities
✓		<ul style="list-style-type: none"> – Dewater of utility vaults (Note: we need to be aware of stringency issues. EPA does not currently have a permit for this.)
✓	✓	<p>Sewage Sludge Permits (Note: DEQ has guidance documents for biosolids and septage use. EPA has existing guidance we may choose to reference.)</p>
✓		<ul style="list-style-type: none"> • Land Application
✓		<ul style="list-style-type: none"> • Disposal
✓		<ul style="list-style-type: none"> • Incineration
✓		<p>Federal Facilities</p>
✓		<p>IPDES Fee Schedule</p>
✓	✓	<p>IPDES Individual Permit (IP) Process</p>
✓		<ul style="list-style-type: none"> • Application content for individual permits
✓		<ul style="list-style-type: none"> • Preapplication meeting
✓		<ul style="list-style-type: none"> • Select permit type
✓		<ul style="list-style-type: none"> • Reuse and recovery
✓		<ul style="list-style-type: none"> • Affordability
✓	✓	<ul style="list-style-type: none"> • POTW major and minor
	✓	<ul style="list-style-type: none"> ▪ Expanded toxicity testing
	✓	<ul style="list-style-type: none"> ▪ Indirect dischargers
	✓	<ul style="list-style-type: none"> ▪ Pretreatment
	✓	<ul style="list-style-type: none"> – Pretreatment (control authority, significant industrial users, categorical industrial users)
	✓	<ul style="list-style-type: none"> – Pretreatment program application content
	✓	<ul style="list-style-type: none"> ▪ Sewer districts in jurisdiction, regional facilities, and nonurban areas
	✓	<ul style="list-style-type: none"> ▪ Collection systems: sanitary sewer overflows (SSOs), combined sewer overflows (CSOs), sanitary sewer system overflow response, and inspection.
	✓	<ul style="list-style-type: none"> ▪ 2000 2014 Water Resources Reform and Development Act (WRRDA) requirements; CWA State Revolving Fund (SRF)
	✓	<ul style="list-style-type: none"> ▪ Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) wastes

User's Guide Volume I	Volume II or Other Guidance	Guidance Topics
✓	✓	<ul style="list-style-type: none"> • Industrial
	✓	<ul style="list-style-type: none"> ▪ Major/minor
	✓	<ul style="list-style-type: none"> ▪ Nonprocess wastewater
	✓	<ul style="list-style-type: none"> ▪ Industrial stormwater
✓	✓	<ul style="list-style-type: none"> • MS4s
	✓	<ul style="list-style-type: none"> ▪ Site specific (e.g., Ada County)
	✓	<ul style="list-style-type: none"> ▪ Postconstruction and erosion catalogue
	✓	<ul style="list-style-type: none"> ▪ Six minimum control measures
	✓	<ul style="list-style-type: none"> – Public education and outreach
	✓	<ul style="list-style-type: none"> – Public involvement/participation
	✓	<ul style="list-style-type: none"> – Illicit discharge detection and elimination
	✓	<ul style="list-style-type: none"> – Construction site runoff control
	✓	<ul style="list-style-type: none"> – Postconstruction runoff control
	✓	<ul style="list-style-type: none"> – Pollution prevention/good housekeeping
	✓	<ul style="list-style-type: none"> ▪ Maximum extent practicable (Note: perhaps not define in guidance, as it is present throughout DEQ rule and statutes)
	✓	<ul style="list-style-type: none"> ▪ Trading mechanisms
	✓	<ul style="list-style-type: none"> • Other individual permit types (e.g., sewage sludge, and federal facilities)
✓	✓	<ul style="list-style-type: none"> • Submit application
✓	✓	<ul style="list-style-type: none"> ▪ Application submittal process (e.g., MS4s submit application with annual report)
✓		<ul style="list-style-type: none"> ▪ Time frame for submittal (perhaps allow for more than 180 days before expiration)
✓		<ul style="list-style-type: none"> • Determine application completeness
✓		<ul style="list-style-type: none"> ▪ Additional information and clarification
✓		<ul style="list-style-type: none"> ▪ Notification of receipt, completeness, and denial
✓		<ul style="list-style-type: none"> ▪ Administrative extension of permits
✓		<ul style="list-style-type: none"> • Application technical assessment (e.g., request clarification, and site visit)
	✓	<ul style="list-style-type: none"> • New sources/dischargers (i.e., antidegradation, process for plans and specs submittal, and confidential business information)
✓	✓	<ul style="list-style-type: none"> • Develop individual draft permit conditions and fact sheet

User's Guide Volume I	Volume II or Other Guidance	Guidance Topics
✓		<ul style="list-style-type: none"> ▪ Working with permittee on development of permit and fact sheet (GPs and IPs)
	✓	<ul style="list-style-type: none"> ▪ Water quality trading
	✓	<ul style="list-style-type: none"> – Bubble permits
	✓	<ul style="list-style-type: none"> ▪ EPA recommended watershed based permitting
✓	✓	<ul style="list-style-type: none"> ▪ Water quality based effluent limits (WQBEL) and Technology based effluent limits (TBEL) (Note: basic description in Volume I; sector specific in Volume II)
	✓	<ul style="list-style-type: none"> – Seasonal and tiered limits
	✓	<ul style="list-style-type: none"> – Method detection limits
	✓	<ul style="list-style-type: none"> – Reasonable potential analysis
✓	✓	<ul style="list-style-type: none"> ▪ Monitoring and reporting requirements (e.g., schedules, frequency.)
✓	✓	<ul style="list-style-type: none"> – Monitoring nonregulated constituents (required monitoring for pollutants without effluent limits; monitoring chemical characteristics of receiving water—e.g., hardness)
✓	✓	<ul style="list-style-type: none"> ▪ Receiving water and effluent characterization
✓	✓	<ul style="list-style-type: none"> ▪ Compliance schedules and interim effluent limits
✓	✓	<ul style="list-style-type: none"> ▪ Special permit conditions ▪ (Note: all permits will have some form of special conditions; Volume II will address sector specifics—e.g., aquaculture GP best management practices (BMPs) and quality assurance project plans [QAPP])
✓		<ul style="list-style-type: none"> ▪ Evaluation of downstream water quality standards (WQS)
✓		<ul style="list-style-type: none"> ▪ Intake credits
✓	✓	<ul style="list-style-type: none"> ▪ Variances and waivers
	✓	<ul style="list-style-type: none"> – CWA 316(a)—evaluation of a water body's balanced, indigenous population of shellfish, fish, and wildlife
	✓	<ul style="list-style-type: none"> – Other specific variances and waivers
	✓	<ul style="list-style-type: none"> ▪ Integrated report
	✓	<ul style="list-style-type: none"> ▪ Temperature TMDLs
	✓	<ul style="list-style-type: none"> ▪ Mixing zones
	✓	<ul style="list-style-type: none"> – Technical feasibility (mixing zone considerations)
✓		<ul style="list-style-type: none"> • Working with permittee on development and review of draft permit and fact sheet

User's Guide Volume I	Volume II or Other Guidance	Guidance Topics
✓		<ul style="list-style-type: none"> ▪ Predraft permit review
✓		<ul style="list-style-type: none"> • Public comment
✓		<ul style="list-style-type: none"> • EPA review (much of description will be in memorandum of agreement [MOA])
✓		<ul style="list-style-type: none"> • Downstream state comments to permit
✓		<ul style="list-style-type: none"> • Endangered Species Act (ESA) issues (e.g., public comment; MOA between services and EPA)
✓		<ul style="list-style-type: none"> • State Historic Preservation Office (SHPO) issues (public comment)
✓		<ul style="list-style-type: none"> • Issuance of final permit
✓		IPDES General Permit (GP) Process
	✓	<ul style="list-style-type: none"> • Sector-specific permitting requirements
	✓	<ul style="list-style-type: none"> • Notice of intent (NOI) content for GPs
✓		<ul style="list-style-type: none"> • Notification to public/permittees of pending GP creation (e.g., issuance of notification: electronic and/or hard copy)
✓		<ul style="list-style-type: none"> • Develop draft permit and fact sheet
✓		<ul style="list-style-type: none"> ▪ Working with permittee on development of permit and fact sheet (GPs and IPs)
✓		<ul style="list-style-type: none"> • Public comment period
✓		<ul style="list-style-type: none"> • Public meeting (e.g., what forum—online or in person) and response to comment
✓		<ul style="list-style-type: none"> • EPA review
✓		<ul style="list-style-type: none"> • Issue final permit
✓		<ul style="list-style-type: none"> • DEQ receives NOI or waiver
	✓	<ul style="list-style-type: none"> ▪ How DEQ acknowledges receipt/acceptance of NOIs (e.g., immediate or timed)?
	✓	<ul style="list-style-type: none"> ▪ List of waivers (i.e., low erosivity waivers [LEWs]; certificate of no exposure [CNE])
	✓	<ul style="list-style-type: none"> • Permit coverage (e.g., immediate, conditional, and delayed)
✓		Permit Modification, Revocation, Reissuance, Termination and Transfer
	✓	<ul style="list-style-type: none"> • Temporary inactivation/reactivation of permits (e.g., aquaculture)
✓		<ul style="list-style-type: none"> • Permit transfer
✓		<ul style="list-style-type: none"> • Permit termination (guidance need to be detailed)
✓		Appeals Process
✓	✓	Permit Compliance and Inspection

User's Guide Volume I	Volume II or Other Guidance	Guidance Topics
✓	✓	<ul style="list-style-type: none"> • Compliance monitoring and reporting
✓	✓	<ul style="list-style-type: none"> ▪ Record keeping
✓	✓	<ul style="list-style-type: none"> ▪ Discharge monitoring reports (DMRs)
✓	✓	<ul style="list-style-type: none"> ▪ Annual reports
✓	✓	<ul style="list-style-type: none"> ▪ Notification types (e.g., letter versus phone)
	✓	<ul style="list-style-type: none"> ▪ Sector-specific CIE activities
✓		<ul style="list-style-type: none"> ▪ Mechanism for correction of inaccurate exceedance data (e.g., in Enforcement and Compliance History Online (ECHO) and IPDES Compliance, Reporting, Inspection, and Permitting System (CRIPS)—a <i>report error</i> type of button on web application)
✓	✓	<ul style="list-style-type: none"> • Inspection process
✓	✓	<ul style="list-style-type: none"> ▪ Offsite record review
✓	✓	<ul style="list-style-type: none"> ▪ Deficiencies
✓	✓	<ul style="list-style-type: none"> ▪ Postinspection correspondence (notification of compliance/noncompliance)
✓	✓	<ul style="list-style-type: none"> ▪ Corrective actions
✓	✓	<ul style="list-style-type: none"> ▪ Sector-specific inspections (e.g., sludge and other facilities)
✓	✓	<ul style="list-style-type: none"> • Sampling (DEQ and permittee), flow measurements, laboratory accreditation/procedures for private and public facilities (e.g., Idaho Bureau of Laboratories), and quality assurance
	✓	<ul style="list-style-type: none"> ▪ Composite, grab, and toxicity testing (WET)
✓		<ul style="list-style-type: none"> • Investigations and citizen complaints
✓		<ul style="list-style-type: none"> • Multimedia inspections (Where facility has multiple state issued permits)
✓		Permit Enforcement
✓		<ul style="list-style-type: none"> • Enforcement
✓		<ul style="list-style-type: none"> ▪ Types of enforcement actions
✓		<ul style="list-style-type: none"> – Notice of violation
✓		<ul style="list-style-type: none"> – Consent order
✓		<ul style="list-style-type: none"> – Compliance agreement schedule
✓		<ul style="list-style-type: none"> ▪ Compliance assistance (e.g., construction GP, local communities/jurisdictions)
✓		<ul style="list-style-type: none"> ▪ Supplemental environmental projects
✓		<ul style="list-style-type: none"> ▪ Public participation

