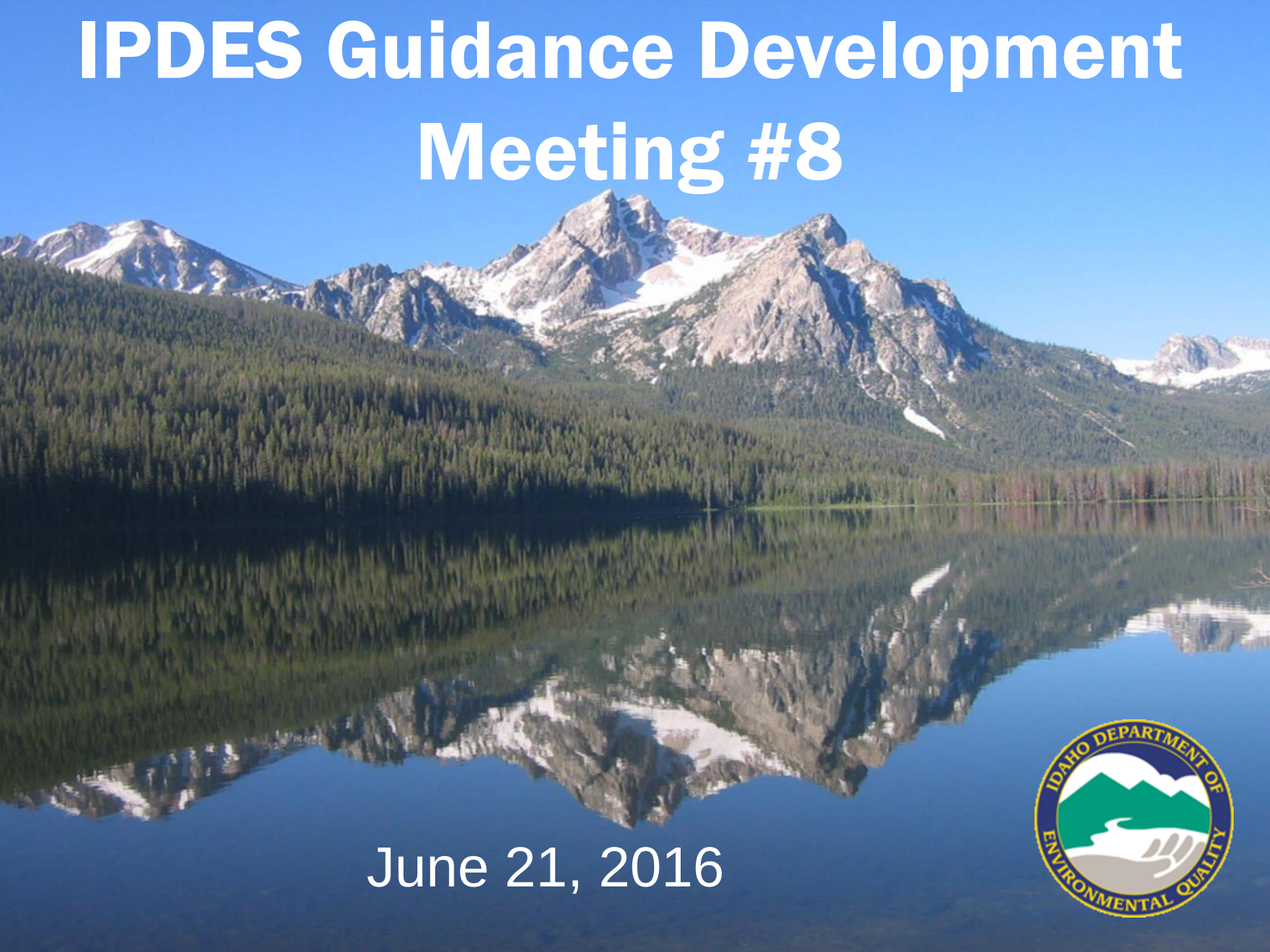
IPDES Guidance Development Meeting #8



June 21, 2016

IPDES Guidance Documents

- IPDES Enforcement Response Guide
  - Comments received and Final ERG posted to IPDES guidance webpage
- IPDES Compliance Monitoring Strategy
  - 30-day comment period ended June 15
- IPDES Memorandum of Agreement with EPA

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

Appendix A – 2016 NPDES Permits in Idaho

Appendix B – IPDES Permit Rating Work Sheet

Glossary, Appendices C & D

-Revisions-
Sections 1 – 8, 10 – 11

- **Committee discussion**
  - **Changes based on May committee meeting**
  - **Written comments received**
    - **Don Smith**
    - **AIC (to be addressed in July)**

-New-
Section 9, Glossary, Appendices C & D

- **Present and discuss**
  - **Section 9 - Compliance Monitoring Activities**
  - **Glossary**
  - **Appendices C & D**
    - **Outline of IP permit development and issuance**
    - **Outline of GP permit development and issuance**

User's Guide Comments

- **Comments by COB, June 28**
  - **User's Guide Volume 1**
    - **New section 9, Glossary, Appendices C & D**
    - **Revisions to entire document (highlighted yellow)**

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July 19 Meeting

- 2-week comment period (July 12 – 26)
  - Draft User's Guide Volume 1
  - Draft IPDES Program Description
- Final IPDES Compliance Monitoring Strategy

IPDES Guidance Development

Memorandum of Agreement

June 21, 2016

Purpose

- Outline and describe the relationship between DEQ and EPA
- Requirement of 40 CFR 123.24

40 CFR 123.24

- **Provisions for:**
  - **Transferring pending applications**
  - **Specifying classes and categories of permit DEQ will send for review and comment**
  - **Specifying frequency and content of reports, documents and other information**
  - **Compliance monitoring and enforcement program**
  - **Coordinating enforcement activities**

Content

- Permit issuance and review
- Transfer during phased implementation
- Reporting and transmitting information
- Compliance evaluations and enforcement
- EPA oversight, revising IPDES rules, and program review

Permit issuance and review

- Jurisdiction
- EPA review
- Public participation
- Variances
- Appeals

Transfer of authority

- Phased implementation
- Permitting Authority
- Inspection Authority

Reporting and transmitting information

- Use of NetDMR
- Use of CDX for data exchange
- Compliance with eReporting Rule

EPA oversight

- Enforcement
- Program review
- Revisions to IPDES rules

Process

- Current Status
- Steps forward