

IPDES Guidance Development Meeting #7



May 23, 2016



IPDES Compliance Monitoring Strategy

- **Present and discuss CMS**
- **30-day comment period ends June 15**

IPDES Enforcement Response Guide

- **30-day comment period ended May 19**
- **Assessing comments**
- **Present final at June 21 meeting**

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 and Inspections – to be developed
 - 10. Enforcement**
 - 11. Appeals, Stays, and Contested Conditions**
- Appendix A – 2016 NPDES Permits in Idaho
- Appendix B – IPDES Permit Rating Work Sheet
- Glossary, Appendices, Other Miscellaneous

-Revisions- Sections 1 – 8

- **Grammar, readability, and punctuation**
- **Committee discussion**
 - **Changes based on April committee meeting**
 - **Changes based on written comments**
 - **Idaho Conservation League**
 - **MWH Global**
 - **Association of Idaho Cities**

-New- Sections 10 & 11

- **Present and discuss:**
 - **Section 10**
 - **Enforcement**
 - **Section 11**
 - **Appeals, Stays, and Contested Conditions**

-Outline-

Section 9 & Miscellaneous

- **Discuss content for:**
 - **Section 9**
 - **Compliance and Inspections**
 - **Other remaining items**
 - **Glossary**
 - **Appendices**
 - **Additional miscellaneous**

June Meeting

• ~~June 22~~ → June 21

- Section 9 – Compliance and Inspections
- Glossary, Appendices, etc.
- Final – Enforcement Response Guide
- IPDES Memorandum of Agreement (DEQ-EPA)

July Meeting

- **July 19**
 - **Draft – User’s Guide Volume 1**
 - **2-week comment period (July 12 – 26)**
 - **Final – Compliance Monitoring Strategy**
 - **IPDES Program Description**

August Meeting

- **August 23**
 - **Final – User’s Guide Volume 1**
 - **Next Steps**
 - **IPDES Application**
 - **User’s Guide Volume 2**
 - **Effluent Limit Development Guidance**

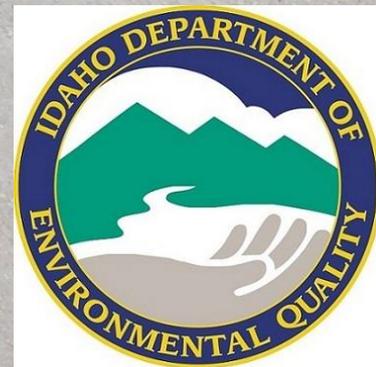
Summary

- **Comments by COB, May 31**
 - **User's Guide Volume 1**
 - **New – Sections 10 & 11**
 - **Revisions – Sections 1 – 8**
 - **Outline – Sections 9, Glossary, Appendices, etc.**
- **Comments by COB, June 15**
 - **IPDES Compliance Monitoring Strategy**

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Compliance Monitoring Strategy



Compliance Monitoring Strategy

- Defines IPDES compliance activities
- Provides inspection frequency goals for core IPDES program and wet weather sources
- Guides yearly commitments for compliance monitoring activities (Annual Plan of Inspections - API)

IPDES Sources with National Inspection Frequency Goals

- Major permittees
- Traditional nonmajor permittees
- Pretreatment program
- Sewage Sludge/biosolids
- Combined/ sanitary sewer systems (CSSs/ SSSs)



IPDES Sources with National Inspection Frequency Goals

- Storm water
 - Municipal separate storm sewer systems (MS4s)
 - Industrial storm water
 - Construction storm water sites
- Concentrated animal feeding operations
- Complaint driven inspections
 - Pesticides
 - Vessels



Other IPDES Sources

- Concentrated aquatic animal production
- Drinking water treatment facilities
- Small suction dredge
- Ground water remediation



CMS - Annual Plan of Inspections

IPDES permit type (Examples)	Comprehensive inspection frequency	Number of facilities	Facilities to be inspected annually
Majors	One inspection every two years	28 POTWs/ 8 Industrial	18
Nonmajors	One inspection per cycle and 5% per year*	96 POTWs/ 21 Industrial	25
Pretreatment	Two inspections every five years	12	5*
Storm water	10% per year	Approximately 1700	Approximately 170
Aquaculture	Major/nonmajor frequencies	92	24
Other sources	5% of permittees	Approximately 175	17
Total Annual Inspections:			Approximately 290

Compliance Monitoring Activities

- Comprehensive inspections
 - With or without sampling
 - Pretreatment and MS4 audits
- Noncomprehensive inspections
 - Focused, follow-up, reconnaissance
 - Off-site desk audits

Alternative CMS

- Inspections or off-site desk audits will meet minimum conditions:
 - Focused inspections
 - Conducted by appropriate DEQ staff
 - Documentation including reporting to ICIS-NPDES
- Annual inspection plan considerations
 - Current enforcement actions
 - SNC in last 4 quarters
 - Unresolved single event violations
 - Discharge to impaired waters
 - Impact to drinking water supplies

Submit comments by June 15, 2016
to: IPDESGuidance@deq.idaho.gov

IPDES Compliance Monitoring Strategy

