Permit Readiness Review Chart

NPDES Permit Readiness Review Topics	Number of Permits Affected	Action Items
Does the permit have a land use compatibility statement form?	85 percent of all permits lack a land use compatibility statement	Develop statewide database of municipal and industrial wastewater treatment facilities
		Review DEQ renewal checklist
		• Use the permit renewal planning process to identify data needs
		• Evaluate readiness of administratively extended permits
		(A2.1, A4.1, A4.2, A4.3)*
Is the receiving water body listed as impaired	63 percent of all permits require data analysis, technical assistance or TMDL review	• Develop strategic approach and a short-term action plan for NPDES permitting
on the 303(d) list?		Review DEQ renewal checklist
		• Use the permit renewal planning process to identify data needs
		Establish temporary data management system
		• Incorporate NPDES data needs into larger organizational data system
		Set goal for data to be available to public
		 Prepare inventory of all permits
		(A3.2, A4.1, A4.2, A4.5, A4.6, A4.7, A4.22)
Is a mixing zone study needed?	44 percent of all permits reviewed need an updated or new mixing zone study	Review DEQ renewal checklist
		• Use the permit renewal planning process to identify data needs
		 Evaluate readiness of administratively extended permits
		Establish temporary data management system
		Incorporate NPDES data needs into larger organizational data system
		Set goal for data to be available to public
		(A4.1, A4.2, A4.3 A4.5, A4.6, A4.7) State of Oregon Department of

^{*}More information on action items can be found in the sections of the Recommendation and Implementation Plan referenced at the bottom of each box. Environmental Quality

NPDES Permit Readiness Review Topics	Number of Permits Affected	Action Items
Is mixing zone information complete?	43 percent of all permits require more information or are missing information	• Develop statewide database of municipal and industrial wastewater treatment facilities
		Review DEQ renewal checklist
		• Use the permit renewal planning process to identify data needs
		• Evaluate readiness of administratively extended permits
		(A2.1, A4.1, A4.2, A4.3)
Is effluent monitoring data available?	56 percent of all permits reviewed require data analysis, collections or review of effluent moni- toring data	Develop strategic approach and a short-term action plan for NPDES permitting
		Review DEQ renewal checklist
		• Use the permit renewal planning process to identify data needs
		Establish temporary data management system
		• Set goal for data to be available to public
		• Prepare inventory of all permits
		(A3.2, A4.1, A4.2, A4.5, A4.6, A4.7, A4.22)
	49 percent of all permits reviewed require data analysis or review	• Partner with stakeholders and regulated community to evaluate ability to comply with existing effluent limits and projected permit requirements
		Establish temporary data management system
		(A2.4, A4.5)
Is ambient data for receiving water body available?	59 percent of all permits require data analysis, technical assistance or TMDL review	• Partner with stakeholders and regulated community to evaluate ability to comply with existing effluent limits and projected permit requirements
		Use the permit renewal planning process to identify data needs
		Establish temporary data management system
		• Establish temporary data management system (A2.4, A4.2, A4.5) DEQ

State of Oregon
Department of
Environmental
Quality

NPDES Permit Readiness Review Topics	Number of Permits Affected	Action Items
Is there an updated process flow diagram or schematic with complete water balance?	37 percent of all permits reviewed need an updated process flow diagram or do not have one in the permit file	Group facilities into "discharge categories," working with stakeholders
		• Partner with stakeholders and regulated community to evaluate ability to comply with existing effluent limits and projected permit requirements
		Review DEQ renewal checklist
		• Create way for DEQ to accept daily monitoring reports electronically
		Establish temporary data management system
		(A2.2, A2.3, A2.4, A4.2, A4.4, A4.5)
Is there a spreadsheet of the last three years of	56 percent of all permits reviewed do not have electronic files for effluent parameters including flow. This means the permit writer must translate data from hardcopy forms to Excel.	• Group facilities into "discharge categories," working with stakeholders
effluent data including flow data?		• Partner with stakeholders and regulated community to evaluate ability to comply with existing effluent limits and projected permit requirements
		Review DEQ renewal checklist
		Create way for DEQ to accept daily monitoring reports electronically
		Establish temporary data management system
		(A2.2, A2.3, A2.4, A4.2, A4.4, A4.5)
Will the facility need upgrades? Or will the permittee have to take significant actions dur-	44 percent of all permits reviewed will need facil-	• Partner with stakeholders and regulated community to evaluate ability to comply with existing effluent limits and projected permit requirements
ing next permit term?	ity upgrades or other sig- nificant action to comply with permit limits. In some cases the permit writer has not determined what upgrades will be	• Identify infrastructure funding gaps
		• Identify policy and finance options for filling gaps
		• Prepare financing plan
		(A2.4, A6.4, A6.5, A6.6)
Will a compliance schedule will be needed in	47 percent of all permits reviewed will likely need a compliance schedule	Create permit writer's guidance and training manual package
the next permit?		Establish pre— and post-training metrics
		Develop training matrix State of Oregon
		(A4.18, A4.19, A4.20) Department of Environmental Quality

NPDES Permit Readiness Review Topics	Number of Permits Affected	Action Items
Does the facility discharges a 303(d) listed 48 percent of pollutant and have a TMDL with wasteload reviewed requirements.	48 percent of all permits reviewed require investigation/data analysis	 Develop strategic approach and short-term action plan for NPDES permitting Review DEQ renewal checklist Use the permit renewal planning process to identify data needs Establish temporary data management system
		 Incorporate NPDES data needs into larger organizational data system Set goal for data to be available to public Prepare inventory of all permits (A3.2, A4.1, A4.2, A4.5, A4.6, A4.7, A4.22)
Will additional monitoring data be required for domestic facilities?	40 percent of all permits reviewed will require an additional data request in regards to effluent parameter samples that are out of date, not included in the original permit or are related to a change in rules	 Develop strategic approach and a short-term action plan for NPDES permitting Review DEQ renewal checklist Use the permit renewal planning process to identify data needs Establish temporary data management system Incorporate NPDES data needs into larger organizational data system
Will new water quality standards apply?	81 percent of all permits require implementation of a new WQ standard (primarily Cu and/or am- monia)	 Develop strategic approach and short-term action plan for NPDES permitting Review DEQ renewal checklist