



# After Permitting

- Permit Compliance
  - Read the WHOLE thing
    - Understand ?
      - Timing, methods, reports
- Schedule
  - Sampling/analysis
  - Reporting

# After Permitting –or- just when you thought you were out of the woods

- There is NO After!
- Between Permitting
  - Compliance Schedules
  - Permit Amendments
  - Permit Extensions
  - Site Applications
  - PQL's
  - Monitoring
    - Water
    - Regulations



# Compliance Schedules

- Allows time for compliance
  - Monitoring/testing
  - Studies
  - Design
  - Construction
  - Optimization
- **Enforceable** permit condition !

# Permit Amendments

- Major
  - Requires public notice and comment period
    - Substantial change to effluent
- Minor
- Reasons For-
  - Study results
    - WER
    - Reasonable potential
    - PQL
  - Standards change

# Permit Extensions

- Continue existing requirements
  - Completion of studies
  - Anticipated standards changed
  - Watershed permitting
  - Consolidation of facilities



# Site Applications

- Amendment required:
  - New process that does NOT increase capacity
  - Physical changes
    - Disinfect ion
      - Gas to Liquid, Liquid to Gas, Cl<sub>2</sub> to UV, etc.
    - Significant changes to-
      - Secondary treatment
      - Primary treatment
      - Digestion
    - Increase/ decrease in Rated capacity (no construction)
    - Add reuse facility





# PQL

- **Practical Quantification Level**
  - Permit Limits at or near MDL or LRC
    - Determined in “clean water”
    - Wastewater may interfere
  - Site Specific PQL
    - Use actual effluent
    - 7 spiked samples
    - 3 laboratories
- PQL used to measure compliance



# Monitoring

- Your receiving waters
  - Upstream
  - Downstream
  - Flow
- The Regulations
  - Frequent changes
- Your Permit
  - Read and understand !

