

Permitting and Enforcement

Helpful Items for Permittees



Nichole Morgan
Central Valley Water Board
NPDES Program Manager

Central Valley Regional Board

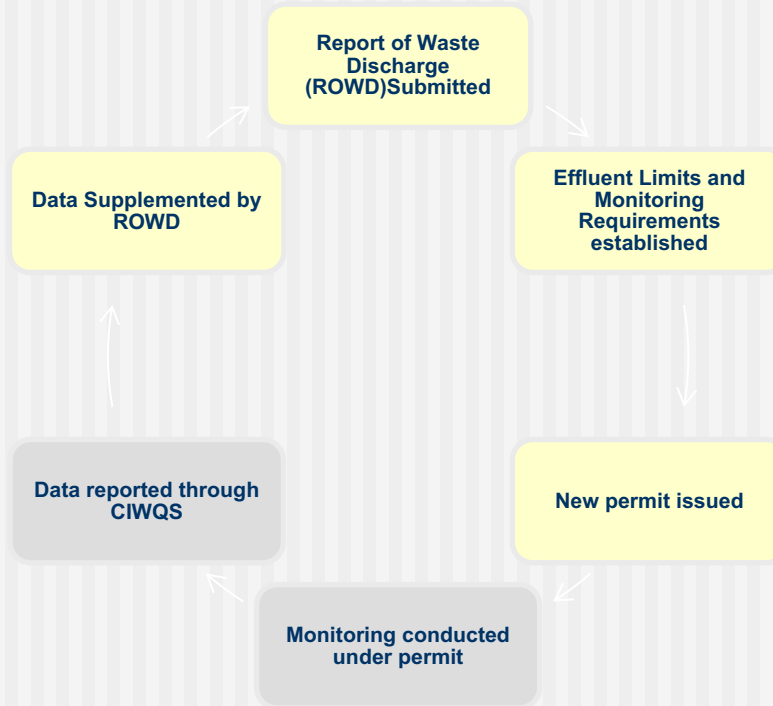


Organization

■ Split Functions

Office	Compliance	Enforcement
Sacramento	C/E	C/E
Fresno	Permitting	Enforcement
Redding	Permitting	Permitting

Permitting Process



Quality Data



Quality Data



Importance of Quality Data

- Reasonable potential analysis (RPA)
 - Notes and flags taken into consideration
 - Potential outliers
 - Plant upsets
 - Plant operations
 - Receiving water conditions
 - Sampling techniques

Data Quality Issues

- Missing or incorrect RLs
- Data not appropriately flagged
- Data from a different facility
- QA/QC issues

Missing RLs

- Unable to determine if the data complies
- Considerable staff time used to track down information

Data not Flagged

- Data appears to be good but should not be used
- May result in more stringent or additional effluent limits and monitoring

Data from Different Location

- Data not representative
- May result in additional or more stringent effluent limits or monitoring

QA/QC Issues

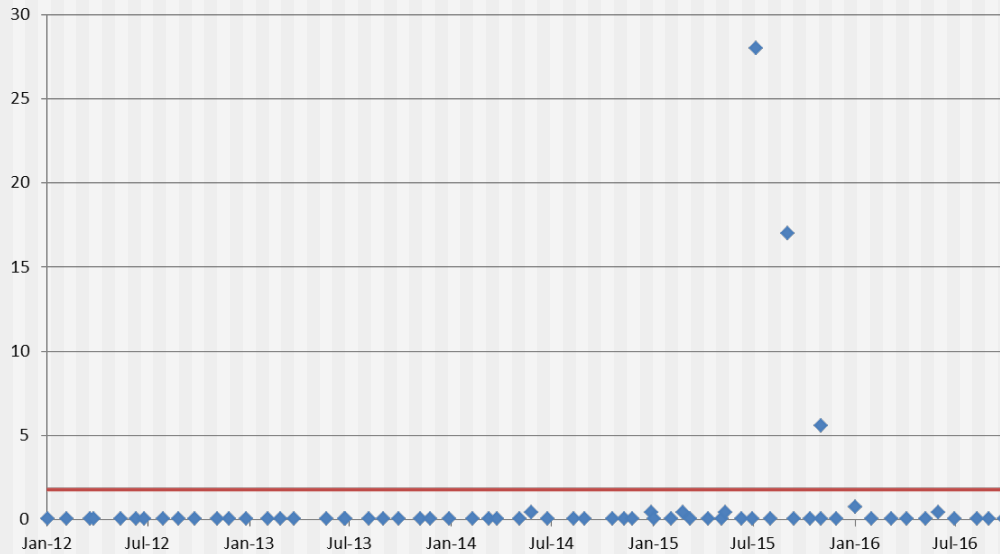
- Outliers
- Facility Issues
- Sampling techniques

Example: Outliers

- Unusual data points not consistent with the dataset
- May be considered outliers
- Any information to explain unusual results?
 - Plant upset
 - Sampling issue

Example: Outliers

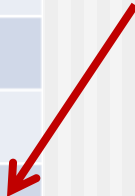
Bis(2-ethylhexyl)phthalate Data



Example: Outliers

Effluent Characterization Monitoring (Composite Samples)	
Date	Result (ug/L)
1/6/15	0.415
3/4/15	0.415
5/20/15	0.415
7/15/15	28
9/10/15	17
11/10/15	5.6

Suction hose for composite sampler was changed prior to sample collection



Example: Outliers

- If all data was used in the RPA
 - Effluent limits would be required (1.8 µg/L average monthly)
 - Monthly monitoring required
- Discarding non-representative data
 - No effluent limits and less monitoring

Example: Facility Issues

- Membrane Cleaning Example
 - Collected sample during membrane cleaning/recirculation
 - Elevated concentrations of chlorine containing compounds
 - Red flag: Facility only uses chlorine to clean the membrane filters

Example: Sample Collection

- Sample Collection
 - Training
 - Techniques
- Mercury Data
 - Extremely high concentrations, not in line with other effluent samples

Example: Sample Collection

Date	Total Mercury (ng/L)	Methylmercury (Ng/L)	%Methylmercury of Total
10/16/13	2	0.06	3
2/5/14	460	0.1	0.02
6/16/14	3.1	0.12	3.8
9/4/14	3	0.12	4
3/11/15	2.6	--	--
6/23/15	499	--	--
9/30/15	1.4	--	--

Example: Sample Collection

- Mercury Data
 - Red flag: methyl mercury didn't correspond with mercury data
 - Incomplete chain of custody sheets

Importance of Quality Data

- Prevents
 - Potential compliance and enforcement issues
 - Additional or more stringent effluent limits
 - Additional monitoring requirements
- Why provide additional information?
 - Prevent unnecessary effluent limits, monitoring, and possibility of compliance project

ROWD

- Opportunity to submit additional info
 - Ask for updates to requirements
- Changes in operations
- Facility upsets
- Schedule meeting with staff prior to submitting

Questions



Permitting Process

Report of Waste
Discharge
submitted

Last 3 to 5 years
of data used to
determine effluent
limits and
monitoring
requirements

Data
Supplemented by
ROWD

Data used to
determine
Reasonable
Potential and new
Monitoring
requirements

Permitting Process

Monitoring under
existing permit

Data reported
through CIWQS

Data
Supplemented by
ROWD

Data used to
determine
Reasonable
Potential and new
Monitoring
requirements