

Overview of Initial Updates to VPDES Permit Writers' Manual

- The following former sections from GM14-2003 have been removed: IN-1, IN-3, MN-1, MN-3.
- Renaming of former sections has taken place as follows: IN-2 is now referred to as IN-1, IN-4 as IN-2, IN-5 as IN-3, and MN-2 as MN-1.

Section I

- Revised the definition of “Monthly average discharge limitation”.
- Removed the permit processing track sheet and the VPDES Process Flow Chart.
- Combined the definitions of “administratively complete” and “technically complete” permit applications.

Section II

- Clarified that any outbound email sent from a DEQ email account is equivalent to a message sent on Agency’s letterhead.
- Added additional language addressing the electronic reporting rule requirements.
- Removed the EPA Form 2A sampling waiver section, as no sampling waivers for Form 2A can be granted.
- Clarified that a permit application shall not be considered complete unless all required quantitative data are collected using sufficiently sensitive analytical methods approved under 40 CFR Part 136 or required under 40 CFR Chapter I, Subchapter N and O.
- Clarified the required application forms for POTW and PVOTW, and specified application requirements for each form.
- Added an Attachment A decision matrix.
- Clarified that a permit cannot be reissued or administratively continued unless all maintenance fee payments are up to date. If the fee is not paid before the expiration date, the permit should be allowed to expire.
- Combined administrative and technical reviews of permit application into one section.

Section III:

- Clarified that the Department has four months, rather than 120 days, to issue or deny a new permit upon determination that the application is deemed complete.

- Clarified that on February 2, 2023, EPA withdrew its waiver of permit review for the NPDES minor industrial categories specified in 40 CFR Part 122 Appendix A, which had originally been granted under the 1975 Memorandum of Understanding (MOU) between the State Water Control Board and the Regional Administrator, Region III Environmental Protection Agency. As per the amended MOU, permits in these categories must now also be submitted to the EPA for review.
- Specified the guidelines for establishing outfall numbers.
- Transferred former Sections III.C (Public Participation Procedures) and III.F (Public Hearing Procedures) to new Section VI.

Section IV:

- This is a new section.
- The former Section IV (Modification Procedures) has been combined with termination procedures (now located in the current Section V).

Section V:

- Added permit modification procedures.
- Revised the procedures for contested permit termination.

Section VI:

- This is a new section. Additionally, the former Sections III.C (Public Participation Procedures) and III.F (Public Hearing Procedures) have been transferred to new Section VI.

Section VII:

- This is a new section.

Section VIII:

- This is a new section.

Section MN-1 (formerly MN-2):

- Former Section MN-2 has been moved to this section.
- Added specifications for special standards and regulations under the sampling schedule table.

- Removed the reduced monitoring section due to pending guidance on reduced monitoring.
- Added information on influent monitoring and precent removal.
- Included details on adjustments to concentration limits derived from the secondary treatment standards or equivalent to secondary standards.
- Revised the CTC and CTO sections to reflect current procedures.
- Added a section on flow data used for municipal permit development.
- Added a section on establishing pH limitations

Section IN-1 (formerly IN-2):

- Former Section IN-2 has been moved to this section.
- Revised the instructions for the NPDES Permit Rating Worksheet to align with DEQ's current practices, removed Appendix C – Great Lakes Areas of Concern.

Section IN-2 (formerly IN-4):

- Added information on components of stormwater management.
- Added a table listing industrial activity sectors covered by the ISWGP.
- Added a table detailing sectors subject to effluent limitation guidelines.
- Included a table of benchmark monitoring parameters by the industry sector.
- Clarified numbering for commingled stormwater and stormwater-only outfalls.
- Removed sector-specific SWPPP requirements, as they are available in the ISWGP regulation

Section IN-3 (formerly IN-5):

- Revised sections related to laundries, petroleum storage and transportation, and water treatment plants to align with general permits for these industries.
- Updated the section on pulp and paper mills, removing outdated information about the Voluntary Advanced Technology Incentives Program, since the ELG compliance deadline was 4/15/2004. Added definitions for pollutants limited by these ELGs. Added a chart guide for determining the applicability of Subpart B and Subpart E standards, and clarified how compliance should be demonstrated.
- Revised the wood preserving operations section to specify pH limitations and added a footnote regarding the use of alternate standards for pH.