

WYPDES Fact Sheets



WYOMING

Kathy Shreve

kathy.shreve@wyo.gov

September, 2019

Fact Sheets and the State of Wyoming

- The Wyoming Pollution Discharge Elimination System Program (WYPDES) typically only creates Fact Sheets for general permits.
- All other permits have a Statement of Basis.
- **What's the difference?**



Fact Sheets and the State of Wyoming

Fact Sheets –

- Tend to be more general.
- Dive into the background, legal basis, and rationale for the proposed general permit. For example, any legal underpinnings are discussed, and Wyoming's rationale for wanting a general permit for the identified activity is discussed.
- Fact Sheets tend to go into detail about the class(es) or subclass(es) of facilities and/or activities that can be covered under the general permit. If a new general permit, will also often contain a list of companies/facilities eligible for the general permit.
- Fact Sheets also, if applicable, describe similar operations that are NOT eligible for general permit coverage.
- Fact Sheets describe how operators can obtain a NOI, and how to submit the NOI.
- If a general permit renewal, the Fact Sheet will describe how permittees can obtain renewed general permit coverage.



Fact Sheets and the State of Wyoming

Statement of Basis—

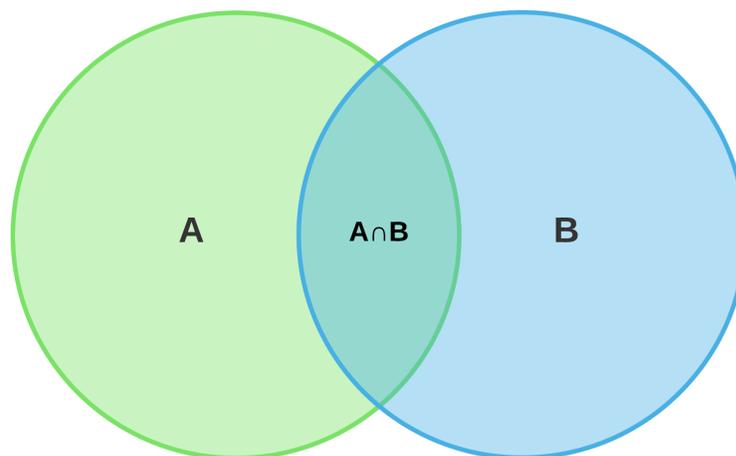
- Focuses on a particular facility.
- Describes the facility in detail.
- Only briefly discusses any legal underpinnings.
- Describes in depth any data used in the permitting process.
- Describes in depth any calculations used in the permitting process.
- For renewed permits, may contain a description of any compliance schedules/compliance issues at the facility.
- Contains a description and classification for all receiving waters, and a list of receiving water designated uses.
- Describes any known receiving water impairments, and how the impairment is addressed (or not addressed) in the permit.



Fact Sheets and the State of Wyoming

What they have in common-

- Describe effluent limit development/establishment.
- If renewals, describe any changes from the previous permit and reasons behind the changes.
- Contain issuance dates and expiration dates.
- Describes any monitoring and result reporting – what constituents are required to be monitored and on what schedule, and how often results have to be reported and how to report them



Fact Sheets and the State of Wyoming

Fact Sheet Pitfalls-

- Always describe legal underpinnings (including citations), useful when responding to comments or when permit renewal has to be handled by permit writer that wasn't in on the original permit development. Helps the new permit writer know what rules etc. to look at for any updates/changes since the last permit cycle.
- If renewals, describe any changes from the previous permit and reasons behind the changes. Helpful because most comments will likely be about changes.
- Always describe how current permittees can obtain renewed permit coverage...because if you don't, you'll be swamped with calls/emails.
- Don't assume anything is common knowledge...

