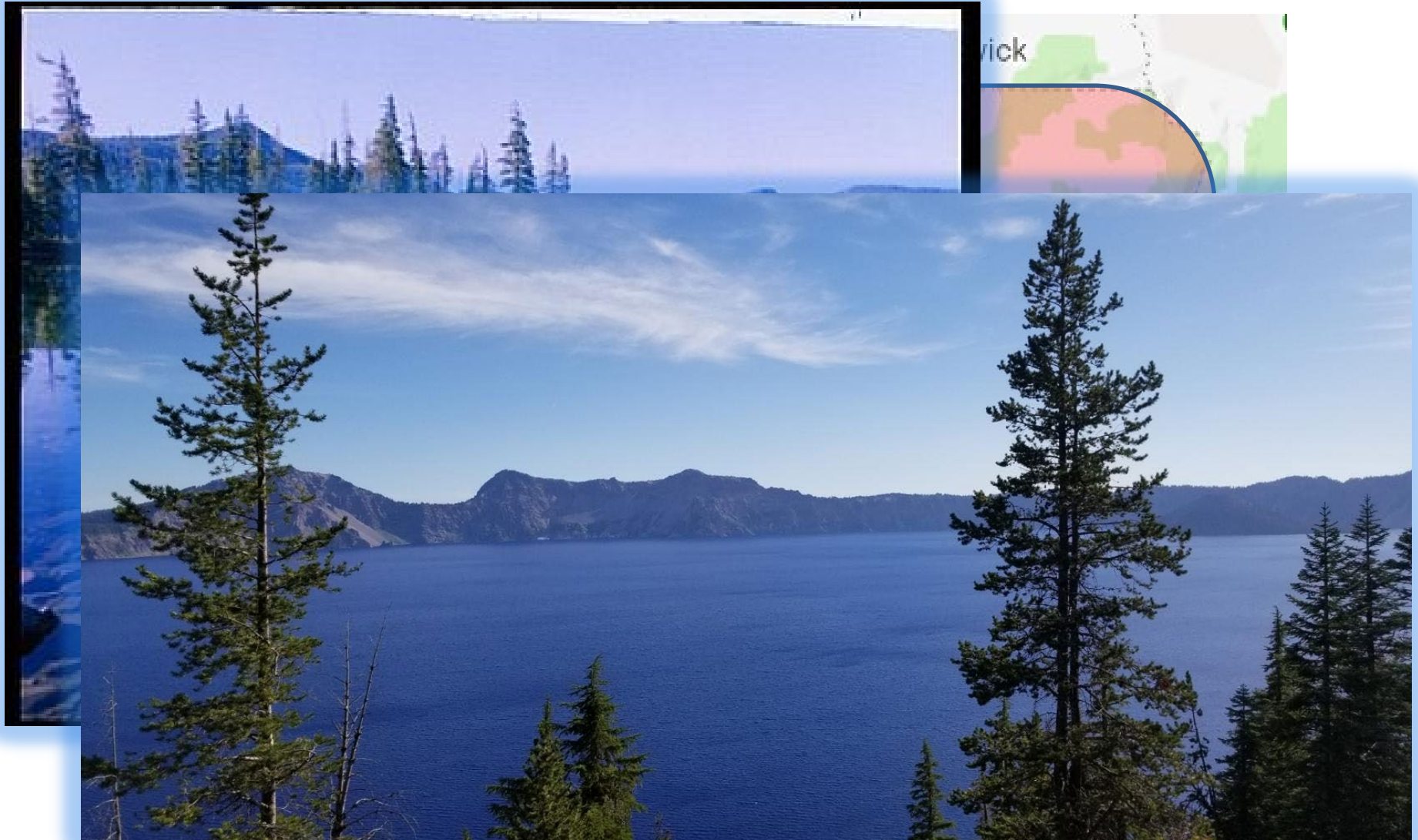


Water Quality Permitting

2019 NPDES Individual Permit Work Plan Update and 2020 NPDES Individual Permit Issuance Plan

September 11, 2019

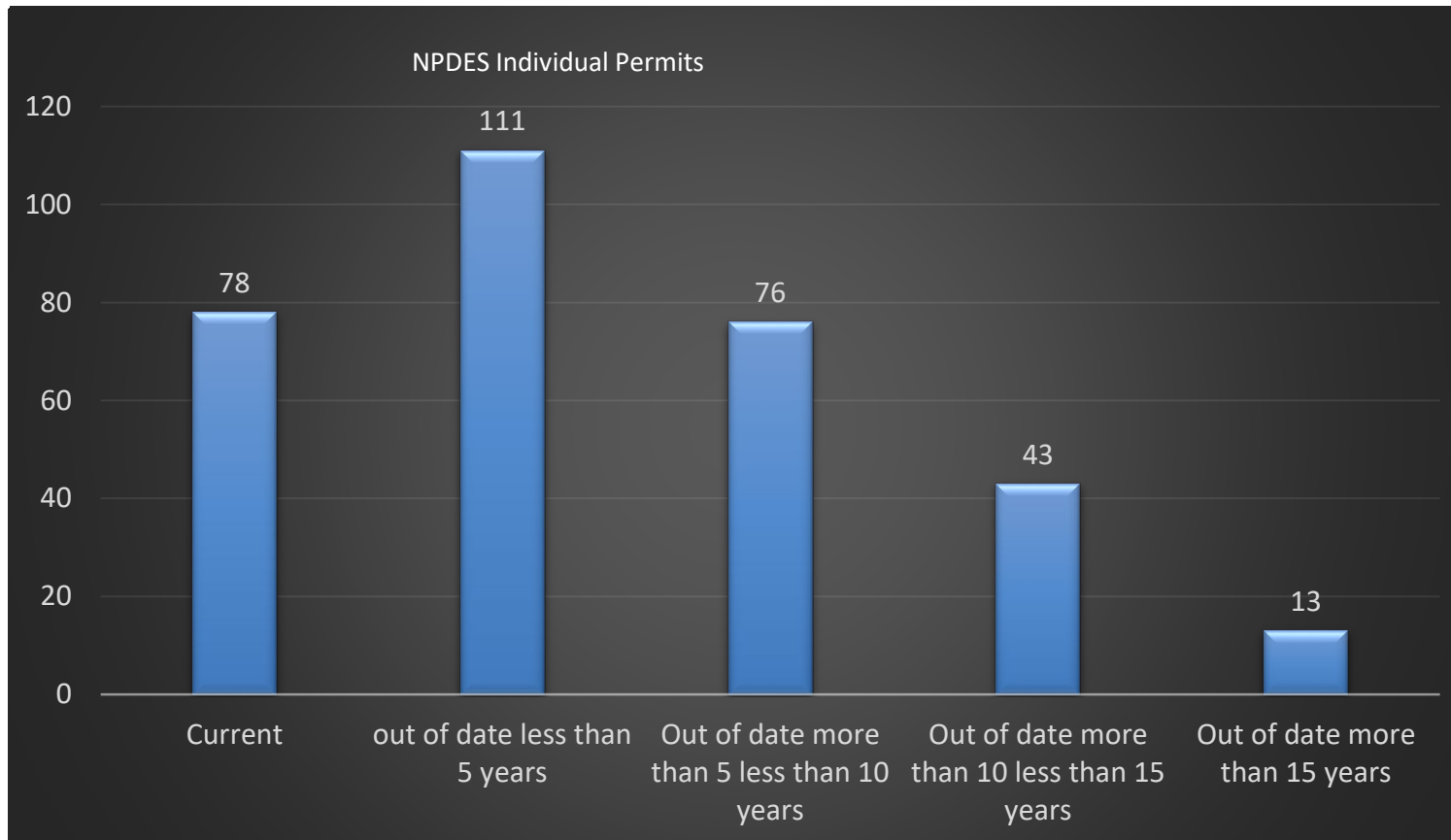
Oregon DEQ Regions



Permit Breakdown by Region

	Eastern Region			Northwest Region			Western Region			Statewide Totals		
Permit Type	Active	Expired	% Expired	Active	Expired	% Expired	Active	Expired	% Expired	Active	Expired	% Expired
NPDES Individual Permit Totals	67	44	66%	99	73	74%	166	136	82%	333	253	76%
NPDES Majors	Active	Expired	% Expired	Active	Expired	% Expired	Active	Expired	% Expired	Active	Expired	% Expired
NPDES Domestic (Major)	10	6	60%	17	10	59%	23	21	91%	50	37	74%
NPDES Industrial (Major)	3	2	67%	7	5	71%	8	7	88%	18	14	78%
NPDES Major Sub Totals	13	8	62%	29	19	66%	33	30	91%	75	57	76%
NPDES Minors	Active	Expired	% Expired	Active	Expired	% Expired	Active	Expired	% Expired	Active	Expired	% Expired
NPDES Domestic (Minor)	27	13	48%	34	22	65%	86	66	77%	147	101	69%
NPDES Industrial (Minor)	26	22	85%	36	32	89%	43	36	84%	106	91	86%
NPDES Minor Sub Totals	54	36	67%	70	54	77%	133	106	80%	258	197	76%

Overall Status of DEQ's NPDES Individual Permit Program



- 🕒 DEQ has 321 Active NPDES Individual Permits (Domestic and Industrial)
- 🕒 76 Percent are Administratively Continued (Out of Date)
- 🕒 132 have been administratively continued five years or more.
- 🕒 13 Permits are more than 15 years out of date

Key Metrics

- Permits issued according to plan
 - [Oregon DEQ Website](#)
 - [Annual Issuance Plan for NPDES Individual Permits](#)
 - 5-Year Issuance Plan for NPDES Individual Permits (NEW in 2020 FFY – Oct 1)

Permit Status	
8	Permits delayed according to schedule
39	Permits on schedule according to 2019/2020 workplan
9	Permits have been issued according to 2019/2020 workplan
12	Estimated permits issued by FFY 2019 Q4

Permit Phase	
35	Permits being drafted
3	Permits on Applicant review
6	Permits on public notice
3	Permits in QA (initial)
55	Total Permits

Methods and implementation

- The Team of 8 (soon to be more!)
 - Recommendations from third part consultants led to permit writing “team”
 - 22 statewide permit writers had multiple responsibilities
 - Focus work – eliminate compliance, inspection, and enforcement requirements
 - Stakeholder engagement becomes very important
- Streamline decision making
 - Identify chain of command that provides quick and consistent decisions
 - Identify clear methods for conflict resolution
 - Designate direct support staff for permit writing team
- Provide technical support for permit writing team
 - Identify subject matter experts (SME) for critical permitting work
 - Mercury, copper, temperature, mixing zones...
 - Permit writers now get consistent message from SME
- Set Priority → “Issue Permits” Top down communication

Importance of Current Permits

- Monitoring requirements and limits reflect current standards and guidelines
- Changes in effluent limits are incremental
- Avoid complex compliance issues
- Fresh data represents current performance
- Permit reflects current operations
- Permits can be updated to support facility planning and upgrades

10 year targets for NPDES Individual permits – By 2027

- Out of date permits total less than 10%
- Annually issue a five year rolling issuance plan that covers all NPDES individual permits
- Update permit template twice per year if necessary
- Permits, data, and supporting documents are available electronically
- Permits are issued within 180 days of application submission
- Continuous improvement – planning, metrics, and reporting

Needs...

Resources, Data, and Resources

- Questions/Comments



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