
Central Valley Regional Water Quality Control Board

FREQUENTLY ASKED QUESTIONS

PROPOSED GENERAL NPDES PERMIT FOR MUNICIPAL WASTEWATER DISCHARGERS THAT MEET OBJECTIVES/CRITERIA AT THE POINT OF DISCHARGE

Q1. *What kind of discharge or facility would be eligible for coverage under the General NPDES Permit?*

A1. Treatment facilities that treat domestic wastewater and meet water quality objectives/criteria at the point of discharge or “end-of-pipe”.

Q2. *What does “at the point of discharge” mean?*

A2. Point of discharge means the point just prior to where the facility effluent discharge meets the receiving water. Under this General Permit, facilities are required to meet all of their effluent limits prior to discharge to the receiving water – or “at the point of discharge.”

Q3. *What are potential advantages of having coverage under the General NPDES Permit versus an Individual NPDES Permit?*

A3. The following is a list of some of the advantages to being covered under the General NPDES Permit versus an Individual NPDES Permit:

- Streamlined application
- Streamlined permitting process (3 to 6 months shorter duration)
- Simple re-enrollment under subsequent General NPDES Permit

Q4. *How would I apply for the General NPDES Permit?*

A4. The application will consist of the submittal of a Notice of Intent (NOI), discussed in the response to Question 5 (see A5) below.

Q5. *What is the NOI?*

A5. The NOI includes information regarding the owner/operator/authorized representative and facility (e.g., [Form 200](#)). Additional data and/or information that the discharger would like the Regional Board to take into consideration can also be provided.

Q6. *What is the Notice of Applicability (NOA)?*

A6. The NOA is the official document signed by the Executive Officer granting regulatory coverage under the General NPDES Permit to the Discharger for the NPDES discharge. The NOA will include at minimum: facility description and applicable final effluent limitations, effluent and receiving water monitoring requirements, beneficial uses, pretreatment program requirements, and minor land discharge specifications.

Q7. *What would the approval process be to get coverage under the General NPDES Permit?*

A7. After the submittal of the NOI, Regional Board staff would review the application and perform a reasonable potential analysis of the data. Staff may request additional information in order to determine eligibility for coverage under the General NPDES Permit. Staff will develop the NOA for approval by the Executive Officer. The subject discharge would have regulatory coverage under the General NPDES Permit after the Executive Officer issues the NOA.

Q8. *Will the Discharger have an opportunity to review a draft of the NOA?*

A8. Yes. The draft NOA will be provided to the Discharger for review prior to the NOA being considered for approval by the Executive Officer.

Q9. *Will there be public review of the NOA before the NOA is approved?*

A9. No. The public review process will be completed during the development and approval process for the General NPDES Permit. The public will be notified by the posting of a Notice of Public Hearing and will have the opportunity to submit written comments and recommendations concerning the tentative General NPDES Permit. The Central Valley Water Board will consider all timely comments received from the public at a public hearing. At the public hearing the Central Valley Water Board will consider testimony and whether to adopt the proposed General NPDES Permit. If the Central Valley Water Board adopts the General NPDES Permit, the Executive Officer will be authorized to issue individual NOAs to specific NPDES discharges that fall under the coverage of the General NPDES Permit.

Q10. *How long would the application and approval process take?*

A10. Since this would be a new General NPDES Permit, the complete process time is undetermined. However, staff estimates the process will take approximately three to four months from the time the applicant submits a complete NOI through issuance of the NOA.

Q11. *What is the term of coverage under the General NPDES Permit?*

A11. The General NPDES Permit would be effective for a five year term. Whenever a new discharge is issued an NOA and enrolled for coverage under the General NPDES Permit, that coverage will expire when the General NPDES Permit expires. When the General NPDES Permit is renewed, the coverage for existing enrollees will be automatically renewed for the next five year term of the renewed General NPDES Permit, as long as the terms and conditions of the NOA are still applicable.

Q12. *Would this Permit apply to discharges that are effluent dominated?*

A12. Yes. The General NPDES Permit can be used for both effluent and not-effluent dominated situations.

Q13. *How long is the information in an engineering study valid?*

A13. As long as the information in the engineering study applies to the existing operations and conditions at the treatment facility, and it is useful to staff in the analysis of determining eligibility of the discharge, then the engineering study should be valid.

Q14. *Would a discharge that has dilution credits be eligible for the General NPDES Permit?*

A14. No. If dilution credits are needed to meet effluent limitations, then the discharge would not be eligible for coverage under the General NPDES Permit.

Q15. *We do not currently meet end-of-pipe limits but are making upgrades to our facility that will enable compliance at the point of discharge – could we apply for the General NPDES Permit now or do we have to wait for the upgrades to be completed?*

A15. A discharger whose facility upgrades are underway and will be able to meet applicable effluent limits at the point of discharge when the upgrades are complete may apply for the General NPDES Permit once it is adopted by the Central Valley Water Board.. Regional Board staff would review the NOI as it is received and will develop an NOA for approval by the Executive Officer as appropriate. The existing compliance schedule would be amended to reflect that an NOA authorizes the facility's discharge is under the General NPDES Permit.

Q16. *Has USEPA been involved with the development of the General NPDES Permit?*

A16. Yes. Staff will continue to request input from the USEPA during the development process.

Q17. *How will the General NPDES Permit work for site-specific constituents that are dependent upon hardness, pH, or temperature?*

A17. The basis for calculating the criterion and the effluent limitations for each constituent would be described in the General NPDES Permit. The applicable site-specific details and applicable final effluent limitations for a particular facility would be contained in the NOA.

Q18. *If the monitoring data for hardness changes, would the corresponding effluent limits change (i.e. will floating limits be issued)?*

A18. No, floating limits will not be issued. The General NPDES Permit would include the procedures for determining site specific limitations and the final effluent limit applicable to the discharger would be included in the NOA.

Q19. *When can I submit the NOI application?*

A19. Staff will begin accepting NOIs after the Central Valley Water Board has adopted the General NPDES Permit in late 2016.

Q20. *Where can I get information regarding what is required with the NOI?*

A20. An application checklist will be developed listing all the necessary information for a complete NOI. Once available, the checklist will be included in the General NPDES Permit and will be posted on the Regional Board's website.

Q21. *If the General NPDES Permit does not work for me, can I obtain an individual NPDES Permit?*

A21. A discharger authorized by the General NPDES may request exclusion from the General NPDES Permit by submitting a Report of Waste Discharge for an individual permit and reasons supporting the request. If the reasons for the individual permit are adequate to support the request, an individual permit will be prepared (See also Q/A #27 below).

Q22. *Have groups or individuals other than dischargers been notified to take part in the development process for the General NPDES Permit?*

A22. Yes. All NPDES permit holders and interested parties including individuals, stakeholders, and non-governmental organizations that have expressed interest in the Central Valley Regional Water Board's NPDES program have been notified.

Q23. Are the enrollees grouped under the General NPDES Permit, such as by region?

A23. The General NPDES Permit will only be available to dischargers in the Central Valley Region. There is no grouping of certain types of projects within the Region.

Q24. Our treatment plant upgrades will not be completed before the General NPDES Permit is available. Will we miss the application window?

A24. No. You will not miss the application window. Please see Q/A #15 and #19 above. You may apply for coverage under the General NPDES Permit at any time while the Order is effective.

Q25. How prescriptive will the General NPDES Permit be for the operation of the UV system?

A25. The General NPDES Permit would include the Regional Board's standard UV specifications, which are based on the National Water Research Institute guidelines. However, just like Individual Permits, the General Permit would allow site-specific UV specifications to be included in the NOA if detailed UV specifications are contained in a Title 22 Engineering Report approved by the Division of Drinking Water.

Q26. Other general orders contain more restrictive monitoring than in our individual NPDES Permit. Will this General NPDES Permit contain restrictive monitoring?

A26. The goal is not to include more restrictive monitoring than what is currently included in individual orders. However, the General NPDES Permit will be developed to apply to multiple discharges, so the monitoring may be different than what is in your current individual NPDES Permit.

Q27. Will dischargers be able to choose between the General NPDES Permit and an individual NPDES Permit for coverage of their discharge?

A27. Dischargers that are eligible for coverage under the General NPDES Permit have the option to be covered under the General NPDES Permit or an individual NPDES Permit; however, the terms and conditions in the individual NPDES Permit will likely be similar to those in the General Permit.

Q28. My individual NPDES Permit does not expire for more than 180 days. When will I be required to apply for the General NPDES Permit?

A28. As soon as the General NPDES Permit becomes available you may apply for coverage for your discharge. However, you may wait to submit your application until no later than 180 days prior to the expiration date of your existing NPDES Permit, in accordance with title 23 of the California Code of Regulations.

Q29. Does this General NPDES Permit apply to my facility?

A29. The Central Valley Water Board has identified 25 facilities ([link](#) to list of 25) that appear to be immediately eligible for the General NPDES Permit. However, there is no intent to guarantee coverage under the General NPDES Permit to the facilities on the list of 25, nor is it the intent to exclude any facility not on the list of 25 from applying for coverage under the General NPDES Permit.

Q30. If a Discharger has more than one discharge point, can the Discharger obtain regulatory coverage under the General NPDES Permit and under an individual NPDES Permit for the separate discharges?

A30. Yes. The Discharger can obtain regulatory coverage under the General NPDES Permit for discharges deemed eligible for coverage and obtain regulatory coverage under an individual NPDES Permit for discharges that are not eligible for the General NPDES Permit.

Q31. Will discharges to land be covered under the General NPDES Permit?

A31. The General NPDES Permit will include standard land discharge specifications (e.g., no objectionable odors, no public contact, etc.). If the land discharge requires more complex or site-specific specifications to ensure the protection of water quality, the Discharger may need to obtain regulatory coverage for the land discharge under a separate permit.