



IOWA DEPARTMENT OF NATURAL RESOURCES

LEADING IOWANS IN CARING FOR OUR NATURAL RESOURCES

NPDES Update

September 9, 2015

Topics of Interest

- EPA Topics
 - Dental Effluent Guideline
 - Sufficiently Sensitive Methods
 - Electronic Reporting Rule
- NPDES Permits
 - State Rulemaking
 - Nutrient Strategy
 - Integrated Planning

Dental Effluent Guideline

- Technology-based pretreatment standards for discharges of pollutants into POTWs from existing and new dental practices that involve the discharge of dental amalgam
- Dental offices covered by this proposed rule could control mercury discharges to POTWs by
 - Reduce discharge of dental amalgam
 - Use of Best Management Practices
- Includes “Dental Industrial User” (DIU) definition

Dental Effluent Guideline

- Requirements
 - Install amalgam removal equipment
 - Proper disposal (annual basis)
- Exemptions
 - Do not place or remove amalgam
- Within three years of active rule
 - Remove at least 99% of mercury from amalgam process
 - Incorporate BMPs
- Current amalgam separators
 - 10 years to comply

Dental Effluent Guideline

- Issues
 - Increases the number of CIUs from ~150 to > 1,000
 - No additional resources provided for inspections, data review, enforcement
 - States are unsure how to handle increase in facilities

Sufficiently Sensitive Methods

- Minor amendment to 40 CFR Parts 122, 136
- Requires all facilities to use EPA-approved methods that can detect pollutants at or below the applicable QWS

Sufficiently Sensitive Methods

Method is sufficiently sensitive if:

- A. The method minimum level is at or below the level of the applicable water quality criterion or permit limitation for the measured pollutant or pollutant parameter; or
- B. In the case of permit applications, the method minimum level is above the applicable water quality criterion, but the amount of the pollutant or pollutant parameter in a facility's discharge is high enough that the method detects and quantifies the level of the pollutant or pollutant parameter in the discharge; or
- C. The method has the lowest minimum level of the EPA-approved analytical methods.

Sufficiently Sensitive Methods

- Applies to NPDES permit applications and discharges
- Does not apply to WET testing
- Effective September 18, 2014

Electronic Reporting Rule

- Rule would require NPDES regulated entities to electronically submit electronic rather than paper reports:
 - Discharge Monitoring Reports (DMRs)
 - Notices of Intent for general permit
 - Program reports
- Applies to ALL NPDES facilities:
 - Direct dischargers
 - Municipal
 - Industrial
 - Semi-public
 - Indirect Dischargers
 - Pretreatment cities
 - Non-pretreatment cities

Electronic Reporting Rule

- Current Implementation
 - Many facilities already reporting electronically
 - Most can do so now if interested.
- Future Implementation
 - Account and Password created
 - Emailed or submitted web portal

State Rule Changes

- Ongoing rule making efforts:
 - Rule “Clean ups”
 - Removal of Chapter 63, “Table III”
 - Operational monitoring requirements
 - Aeration basins, digesters, etc...
 - Public comment period coming soon

Nutrient Strategy

- 64 permits issued with “feasibility study”
- Planning to continue to reissue ~ 20 Major permits annually
- Three facilities committed to upgrading and including nutrient removal

Nutrient Strategy

- Trading
 - No current implementation
 - Considering options for a few cities (League of Cities)
- Feasibility Studies
 - Three currently submitted
 - Under review

Integrated Planning

- Not really a new concept, but EPA seems to think so.
- Allows communities to consider the “big picture” when allocating funding to clean water issues
 - WWTP upgrades
 - STW/CSO issues
 - WTP discharges
- One plan, one approach to address several issues.

Integrated Planning

- Steps in developing an Integrated Plan
 - Identify water obligations
 - Define cost and schedules
 - Look at financial capability
 - Define environmental/health impacts
 - Develop prioritized schedule
 - Complete Integrated Plan

Slide courtesy of Fred Andes, Barnes and Thornburg, LLP

Integrated Planning

- Plan is ultimately developed by municipality but DNR can be significantly involved.
- Currently working with a municipality to develop IP, one other has expressed interest.

Questions?



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