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## Indirect Discharge Permitting Process

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This fact sheet describes the steps the Ohio EPA Division of Surface Water Pretreatment Unit generally follows when it drafts indirect discharge permits.

### STEP 1

#### **Ohio EPA Evaluation of Completeness of Permit Application**

- A. Completion of two-page application form per instructions.
- B. Submission of \$200 application fee payable to "Treasurer of the State of Ohio."
- C. Submission of a process flow diagram showing:
  - all sources of wastewater;
  - flows generated by each wastewater source;
  - ultimate disposal locations of wastewater sources (including process, non-process and dilution flows); and
  - wastewater treatment units.
- D. Submission of site map showing:
  - process areas, storage areas, treatment facilities, sewers, floor drains, manholes, connection to sewers, sampling locations, property lines and buildings.
- E. Submission of a letter from the Publicly Owned Treatment Works (POTW) that authorizes the facility's discharge to the sanitary sewer (requirements of a POTW authorization letter can be found at [OAC 3745-36-03\(E\)](#)).
- F. Submission of a list of other environmental control permits.
- G. Submission of sampling results, per instructions, with descriptions of sampling

locations.

For application forms and instructions, visit the Web site <http://www.epa.state.oh.us/dsw/pretreatment/forms.html>.

### STEP 2:

#### **Ohio EPA Evaluation of Application and Determination of Significant Industrial User Status**

- A. Evaluate industrial processes from process flow diagrams and determine categorical status from categorical standard regulations.
- B. Evaluate and categorize regulated, unregulated and dilute flows.
- C. Evaluate impact based on pollutant type and loading of industrial discharge from sampling and analytical data
- D. Evaluate potential impact of industrial discharge to POTW by considering:
  - interference, passthrough etc.;
  - values from applicable Ohio EPA and U.S. EPA local limit guidance documents;
  - [Ohio water quality standards regulations](#);
  - [Ohio sewage sludge regulations](#);
  - [Federal 503 sewage sludge rules](#);
  - POTW annual sludge report;
  - POTW National Pollutant Discharge Elimination System (NPDES) monitoring data;
  - consultation with POTW representatives; and
  - any other available data.

To obtain electronic versions of available pretreatment guidance documents, visit the U.S. EPA Web

site <http://www.epa.gov/npdes> and the Ohio EPA Web site <http://www.epa.state.oh.us/dsw/pretreatment>.

### STEP 3:

#### **Ohio EPA Determination of Permit Limits and Monitoring Requirements**

- A. Identify pollutants of concern from STEP 2.
- B. Determine categorical limits at the monitoring location (by applying combined waste stream formula, production based standards etc., as necessary).
- C. If necessary, determine local limits for pollutants of concern, considering potential:
  - inhibition and interference of POTW operations;
  - impacts on POTW sewage sludge disposal;
  - violation of POTW NPDES permit limits;
  - violation of [Ohio water quality standards regulations](#);
  - impacts on the sewer system; and
  - impacts on worker health and safety.
- D. Compare the local limit for a parameter with the categorical limit (if applicable) and incorporate the more stringent limit in the indirect discharge permit.
- E. If the local limit calculated for a parameter does not have a corresponding categorical limit, Ohio EPA determines whether to include a limit with monitoring or just monitoring in the indirect discharge permit. This decision

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depends on:

- actual industrial loading for the pollutant compared to actual influent loading to the POTW;
- whether influent loading to the POTW is substantial (e.g., 50 per cent or more) compared to allowable loading calculated from inhibition, sludge or effluent discharge criteria;
- type (batch or continuous) and frequency of industrial discharge;
- available environmental data (POTW effluent data from NPDES operating reports, POTW sludge data, actual receiving stream chemical and biological data from Ohio EPA reports, etc.);
- compliance history;
- past instances of slug loading;
- comparison of trends (e.g., comparing POTW zinc influent data with POTW effluent biochemical oxygen demand (BOD5) data for carbonaceous inhibition, ammonia effluent data to determine nitrification inhibition occurs);
- discussion with POTW

authority;

- review of past inspection and monitoring reports; and
  - best professional judgement.
- F. Establish monitoring frequencies based on the ratio of industrial user process flow to POTW average flow (see [DSW Policy DSW-0500.003](#), issued July 5, 1994).
- G. Establish the type of discharge (e.g., grab, multiple grab, 8-hour composite, 24-hour composite etc., based on:
- review of application information;
  - Ohio EPA site inspection letter; and
  - discussions with industry representatives and POTW personnel.
- H. Establish representative sampling location(s).

#### STEP 4:

#### **Ohio EPA Decision on Indirect Discharge Permit**

- A. Public notice draft permit for a 30-day comment period.
- B. The director will take final action

on the draft permit and issue the final indirect discharge permit with an effective date after the end of the comment period and consideration of all comments received, if all requirements are met.

- C. The application/permit may be denied if the discharge violates any of the prohibited discharges found at [OAC 3745-3-04](#).

Ohio EPA's performance standard is to take action on indirect discharge permits within 180 days of receiving a COMPLETED application.

#### **What if I have more questions on the indirect discharge permitting process?**

You can contact Julia Zhang of the Ohio EPA Division of Surface Water, Pretreatment Unit, at (614) 728-1323 or [julia.zhang@epa.state.oh.us](mailto:julia.zhang@epa.state.oh.us).

You may also visit Ohio EPA's pretreatment Web site at: <http://www.epa.state.oh.us/dsw/pretreatment/index.html>.