



Environmental Protection Agency, Region 10

NPDES Permit Major/Minor Designation Request

Background

Prior to implementation of the National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule (e-reporting rule), EPA only allowed EPA Headquarters staff to modify the "Permit Major/Minor Status Indicator" data element in ICIS-NPDES. Following implementation, EPA Regional staff and authorized NPDES program staff can modify this data element. However, the e-reporting rule did not change federal regulations at 40 CFR 122.2, therefore, the EPA R10 concurrence is required prior to authorized states assigning or changing major/minor designations for new or existing permittees. EPA anticipates major/minor designation changes will occur concurrent with permit actions, such as permit issuance, re-issuance and modification.

Procedure

1. **The permitting authority** must gather information to justify the status change. States may adopt an internal procedure and approval process for status change requests.
2. **The permitting authority** must submit the request to EPA R10 for concurrence. Email the *Major/Minor Request Form* to the EPA Region 10 NPDES Permits Unit Oversight Lead (Karen Burgess, burgess.karen@epa.gov) or mail to:

U.S.EPA
M/S OWW-191, Attn: NPU Manager
1200 6th Ave, Suite 900
Seattle, WA 98101
3. **EPA Region 10**, NPU Permit Oversight Lead will process the *Major/Minor Change Request* and refer to the NPU Permits Unit Manager's for concurrence with the requested change.
4. **If EPA concurs** with the proposed change request, the permit authority will be contacted and may process the changes in the ICIS-NPDES database.
5. **If EPA does not concur** with the change, the permit authority will be contacted and the current designation must remain until concerns or issues preventing the designation change have been resolved and concurrence has been granted.

Fill in all the information requested in the enclosed *Major/Minor Designation Request Form* and follow this procedure prior to making major/minor designations or changes to existing designations. Contact EPA if you have any questions.

Contact Information:

Karen Burgess, P.E.
State Oversight Lead
NPDES Permits Unit - EPA Region 10
206-553-1644 | Burgess.Karen@epa.gov

Major/Minor Designation Request Form

Instructions: Complete the following information.

| General Permit Information | |
|---|--|
| EPA Permit Number | |
| State Permit Number (if applicable) | |
| Permittee Name | |
| Current Permit Type (POTW, Industrial, Domestic) | |
| Current Permit Issuance Date | |
| Current Permit Effective Date | |
| Current Permit Expiration Date | |
| Major/Minor Designation Information | |
| Current Permit Status Designation (major or minor) | |
| Proposed Permit Status Designation (major or minor) | |
| For POTW or Domestic, Design Flow (indicate units) | |
| For POTW or Domestic, Actual average daily flow (indicate units) | |
| For Industrial Facilities, insert rating score and attached or provide the Industrial Rating Sheet | |
| Provide Justification Explain facility changes that occurred to justify a change in status as this time. | |

Concurrence Tracking

| | |
|--|--|
| Received by (NPU Staff Name) | |
| Received Date | |
| Reviewed by (NPU Staff Name) | |
| Review Complete Date | |
| Concurrence by (NPU Manager) | |
| Concurrence Complete Date | |
| Concurrence by (NPU Manager) - Signature | |
| Transmitted to Permitting Authority Date | |
| If no concurrence, explain why. | |

Copy to:

- R10 NPDES Compliance Unit, ICIS-NPDES Coordinator _____
- State Contact, Name _____ email address _____
- Other _____

NPDES Permit Rating Work Sheet

- Regular Addition
- Discretionary Addition
- Score change, but no status change
- Deletion

NPDES No.: _____

Facility Name: _____

City: _____

Receiving Water: _____

Reach Number: _____

Is this facility a steam electric power plant (SIC=4911) with one or more of the following characteristics?

1. Power output 500 MW or greater (not using a cooling pond/lake)
 2. A nuclear power plant
 3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rate
- YES; score is 600 (**stop here**) NO (continue)

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

- YES; score is 700 (**stop here**)
- NO (continue)

FACTOR 1: Toxic Pollutant Potential

PCS SIC Code: _____ Primary SIC Code: _____

Other SIC Codes: _____

Industrial Subcategory Code: _____ (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. (Be sure to use the TOTAL toxicity potential column and check one)

| Toxicity Group | Code | Points | Toxicity Group | Code | Points | Toxicity Group | Code | Points |
|--------------------------|------|--------|----------------|------|--------|----------------|------|--------|
| No process waste streams | 0 | 0 | 3. | 3 | 15 | 7 | 7 | 35 |
| - 1. | 1 | 5 | - 4. | 4 | 20 | - 8. | 8 | 40 |
| - 2. | 2 | 10 | - 5. | 5 | 25 | - 9. | 9 | 45 |
| | | | - 6. | 6 | 30 | - 10. | 10 | 50 |

Code Number Checked: _____

Total Points Factor 1: _____

FACTOR 2: Flow/Stream Flow Volume *(Complete either Section A or Section B; check only one)*

Section A - Wastewater Flow Only Considered

| Wastewater type (See Instructions) | Code | Points |
|---------------------------------------|------|----------|
| Type I: Flow < 5 MGD | - | 11 0 |
| Flow 5 to 10 MGD | - | 12 10 |
| Flow > 10 to 50 MGD | - | 13 20 |
| Flow > 50 MGD | - | 14 30 |
| Type II: Flow < 1 MGD | - | 21 10 |
| Flow 1 to 5 MGD | - | 22 20 |
| Flow > 5 to 10 MGD | - | 23 30 |
| Flow > 10 MGD | - | 24 50 |
| Type III: Flow < 1 MGD | - | 31 0 |
| Flow 1 to 5 MGD | - | 32 10 |
| Flow > 5 to 10 MGD | - | 33 20 |
| Flow > 10 MGD | - | 34 30 |

Section B - Wastewater and Stream Flow Considered

| Wastewater type (See Instructions) | Percent of Instream Wastewater Concentration at Receiving Stream Low Flow | Code | Points |
|---------------------------------------|---|------|----------|
| Type I/III: | <10% | - | 41 0 |
| | ≥10% to <50% | - | 42 10 |
| | ≥50% | - | 43 20 |
| Type II | <10% | - | 51 0 |
| | ≥10% to <50% | - | 52 20 |
| | ≥50% | - | 53 30 |

Code Checked from Section A or B: _____

Total Points Factor 2: _____

NPDES Permit Rating Work Sheet

FACTOR 3: Conventional Pollutants

NPDES No.: _____

(only when limited by the permit)

A. Oxygen Demanding Pollutants (check one) - BOD - COD - OTHER: _____

| | | | Code | Points |
|---------------------------|---|-----------------------|------|--------|
| Permit Limits (check one) | - | <100 lbs/day | 1 | 0 |
| | - | 100 to 1000 lbs/day | 2 | 5 |
| | - | >1000 to 3000 lbs/day | 3 | 15 |
| | - | >3000 lbs/day | 4 | 20 |

Code Checked: _____

Points Scored: _____

B. Total Suspended Solids (TSS)

| | | | Code | Points |
|---------------------------|---|-----------------------|------|--------|
| Permit Limits (check one) | - | <100 lbs/day | 1 | 0 |
| | - | 100 to 1000 lbs/day | 2 | 5 |
| | - | >1000 to 5000 lbs/day | 3 | 15 |
| | - | >5000 lbs/day | 4 | 20 |

Code Checked: _____

Points Scored: _____

C. Nitrogen Pollutants (check one)

- Ammonia - OTHER: _____

| | | | Code | Points |
|---------------------------|---|-----------------------|------|--------|
| Permit Limits (check one) | - | <300 lbs/day | 1 | 0 |
| | - | 300 to 1000 lbs/day | 2 | 5 |
| | - | >1000 to 3000 lbs/day | 3 | 15 |
| | - | >3000 lbs/day | 4 | 20 |

Code Checked: _____

Points Scored: _____

Total Points Factor 3: _____

FACTOR 4: Public Health Impact

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this includes any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above referenced supply.

- YES (if yes, check toxicity potential number below)
- NO (if no, go to Factor 5)

*Determine the human health toxicity potential from Appendix A. Use the same SIO Code and subcategory reference as in Factor 1E (Be sure to use the human health toxicity group column and **check one below**)*

| Toxicity Group | Code | Points | Toxicity Group | Code | Points | Toxicity Group | Code | Points |
|--------------------------|------|--------|----------------|------|--------|----------------|------|--------|
| No process waste streams | 0 | 0 | 3. | 3 | 0 | 7. | 7 | 15 |
| - 1. | 1 | 0 | - 4. | 4 | 0 | 8. | 8 | 20 |
| - 2. | 2 | 0 | 5. | 5 | 5 | 9. | 9 | 25 |
| | | | 6. | 6 | 10 | 10. | 10 | 30 |

Code Number Checked: _____

Total Points Factor 4: _____

NPDES Permit Rating Work Sheet

FACTOR 5: Water Quality Factors

NPDES No.: _____

A. *Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-based federal effluent guidelines, or technology-based state effluent guidelines), or has a wasteload allocation been assigned to the discharge?*

| | Code | Points |
|-------|------|--------|
| - YES | 1 | 10 |
| - NO | 2 | 0 |

B. *Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?*

| | Code | Points |
|-------|------|--------|
| - YES | 1 | 0 |
| - NO | 2 | 5 |

C. *Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?*

| | Code | Points |
|-------|------|--------|
| - YES | 1 | 10 |
| - NO | 2 | 0 |

Code Number Checked: **A.** _____ **B.** _____ **C.** _____

Total Points Factor 5 ~~A.~~ _____ + **B.** _____ + **C.** _____ = _____

FACTOR 6: Proximity to Near Coastal Waters

A. *Base Score: Enter flow code here (from Factor 2):* _____

Enter the multiplication factor that corresponds to the flow code: _____

Check appropriate facility HPRI Code (from PSC):

| HPRI# | Code | HPRI Score |
|-------|------|------------|
| 1 | 1 | 20 |
| 2 | 2 | 0 |
| 3 | 3 | 30 |
| 4 | 4 | 0 |
| 5 | 5 | 20 |

| Flow code | Multiplication Factor |
|---------------|-----------------------|
| 11, 31, or 41 | 0.00 |
| 12, 32, or 42 | 0.05 |
| 13, 33, or 43 | 0.10 |
| 14 or 34 | 0.15 |
| 21 or 51 | 0.10 |
| 22 or 52 | 0.30 |
| 23 or 53 | 0.60 |
| 24 | 1.00 |

HPRI Code Checked: _____

Base Score (HPRI Score) _____ x (Multiplication Factor) _____ = _____ (Total Points)

B. Additional Points – NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

| | Code | Points |
|-------|------|--------|
| - YES | 1 | 10 |
| - NO | 2 | 0 |

C. Additional Points – Great Lakes Area of Concern

For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 areas of concern (see instructions)?

| | Code | Points |
|-------|------|--------|
| - YES | 1 | 10 |
| - NO | 2 | 0 |

Code Number Checked: **A.** _____ **B.** _____ **C.** _____

Total Points Factor 6 **A.** _____ + **B.** _____ + **C.** _____ = _____

NPDES Permit Rating Work Sheet

Score Summary

NPDES No.: _____

| Factor | Description | Total Points |
|--------|------------------------------------|--------------|
| 1. | Toxic Pollutant Potential | _____ |
| 2. | Flow/Streamflow Volume | _____ |
| 3. | Conventional Pollutants | _____ |
| 4. | Public Health Impacts | _____ |
| 5. | Water Quality Factors | _____ |
| 6. | Proximity to Near Coastal Waters | _____ |
| | TOTAL (Factors 1 through 6) | _____ |

S1. Is the total score equal to or greater than 80? - YES (Facility is a major) - NO

S2. If the answer to the above question is no, would you like this facility to be discretionary major?

- NO

- YES (Add 500 points to the above score and provide reason below:

Reason: _____

.....**NEW SCORE:** _____

OLD SCORE: _____

Permit Reviewer's Name

Phone Number

Date