

SHORT DURATION DISCHARGE GENERAL PERMIT

Fact Sheet

WPDES Permit No. WI-0059137-04-0

August 20, 2014

OVERVIEW

General permits are designed to cover discharges from a class of facilities, industries or discharges that are similar in nature. General permits currently exist for noncontact cooling water, swimming pool draining, pit/trench dewatering, and numerous other types of facilities and discharges.

Prior to commencing a discharge under the Short Duration Discharge GP, a facility must receive Department authorization in the form of a letter granting coverage.

To cover a facility under a general permit, the Department sends a letter granting coverage and a copy of the general permit to the facility following the Department's review for eligibility. The letter includes the Department's determination that a facility's discharge is covered under the general permit. The Department may withdraw coverage under a general permit and require a facility to apply for an individual WPDES discharge permit if the facility does not comply with the terms and conditions of the general permit. If a facility does not want to be covered by a general permit, the Department will issue an individual permit to that facility.

The Short Duration Discharge General Permit (GP) was created in response to requests for coverage of discharges that occur infrequently, are relatively short in duration, and do not represent an environmental concern. The Department will not cover a discharge under the Short Duration Discharge GP when any one of the Department's other general permits is more applicable. For example, the discharge of noncontact cooling water is more appropriately covered by the Noncontact Cooling Water GP (WI-0044938). The discharge of contaminated groundwater is more appropriately addressed by the Contaminated Groundwater from Remedial Action Operations GP (WI-0046566). The land application of industrial sludge, by-product solids and liquid wastes are more appropriately covered by the Land Application of Industrial Sludge (WI-0057657), Land Application of By-Product Solids (WI-0057665) and Land Application of Liquid Industrial Wastes (WI-0055867) GPs.

While the types of discharges that can be covered may vary, the Short Duration Discharge GP is not appropriate for a discharge that is a significant contributor of pollution. Such a discharge, if allowed at all, is more appropriately regulated under an individual discharge permit, which would provide the oversight and conditions necessary to prevent significant environmental impacts.

The Short Duration Discharge GP should not be viewed by facilities as a means to avoid the effort and cost associated with more appropriate discharge options. Consideration should always be given to pollution prevention options such as water reuse.

RATIONALE FOR PERMIT REQUIREMENTS

1 APPLICABILITY CRITERIA

The Short Duration Discharge GP is applicable to a wide variety of discharges to both surface waters and groundwater. Qualifying discharges may not occur for more than 90 days and may not occur in consecutive years. A facility **must be authorized by the Department via a letter granting coverage** to discharge under the Short Duration Discharge GP.

Coverage of a facility's discharge under the Short Duration Discharge GP is limited to a maximum of 90 days. If the discharge is continuous, the permit may cover 90 consecutive days or less of discharge. If the discharge is intermittent, the period of discharge beginning on the first day of the initial discharge and ending on the last day of the final discharge must be 90 days or less to qualify for coverage under the Short Duration Discharge GP.

Unless the Department specifies otherwise, the allowable period of discharge begins on the date of the Department's letter granting coverage and ends 90 days later. The Department may shorten the period of

coverage, however. For example, the Department may specify an allowable period of discharge of only one week. The Department may grant extensions, but the entire coverage period may not exceed 90 days from the initial date of coverage.

The Short Duration Discharge GP is not intended to cover seasonal discharges or those that occur every year as part of the facility's normal activities. Such discharges are more appropriately regulated under an individual permit or one of the Department's other general permits.

The Department may use the Short Duration Discharge GP to cover the same facility more than once in a given year or in consecutive years as long as the type of discharge that is covered is not the same. The Department must authorize coverage of each discharge by Short Duration Discharge GP.

The Short Duration Discharge GP does not authorize discharges that occur as a result of spills, bypasses, or overflows.

The Short Duration Discharge GP is not intended to cover the discharge of domestic wastewater.

Environmental impact is a primary consideration in determining the appropriateness of coverage under the Short Duration Discharge GP. If it appears that a discharge will violate a surface-water or groundwater quality standard, the Department will not grant coverage under the Short Duration Discharge GP. Specifically, discharges to surface waters that require a water quality-based effluent limitation pursuant to chs. NR 102, NR 104, NR 105, NR 106, NR 207 or NR 217, Wis. Adm. Code, and discharges to groundwater that exceed a preventive action limit in ch. NR 140, Wis. Adm. Code, must be covered by an individual discharge permit with appropriate effluent limitations.

Discharges covered under the Short Duration Discharge GP may not adversely impact wetlands and must meet the wetland protection requirements of ch. NR 103, Wis. Adm. Code. For discharges that impact wetlands, a facility must submit information that allows the Department to determine if the discharge meets code requirements before the facility can be covered by the Short Duration Discharge GP.

The Short Duration Discharge GP does not authorize discharges to outstanding and exceptional resource waters. Regulation of such a discharge requires an individual permit, which would provide the oversight and effluent limitations necessary to protect receiving waters of such high quality.

The Short Duration Discharge GP does not authorize a new or increased discharge of a pollutant of concern to an impaired water body unless the discharge is consistent with an EPA and Department approved total maximum daily load (TMDL) allocation for the impaired water body. "Pollutant(s) of concern" means a pollutant that is causing impairment of a listed water body. The current link to the Department's list of impaired water bodies is <http://dnr.wi.gov/topic/impairedwaters/>. Approved TMDLs can be found at <http://dnr.wi.gov/topic/tmdls/>.

This Short Duration Discharge GP may not be used if the above requirement is not met for a new discharge. In response to requests for coverage, the Department will normally evaluate the proposed new pollutant discharge amount and receiving water to determine if the above requirement can be met. A variety of options are available to the applicant to reduce, with the goal of eliminating the pollutant discharge, could be explored such as on-site capture of the pollutant of concern, an alternate discharge location or wastewater reuse opportunities.

2 REQUIREMENTS FOR ALL COVERED FACILITIES

The following requirements apply to all facilities covered by the Short Duration Discharge GP.

Submittal of Monitoring Results: The Short Duration Discharge GP requires covered facilities to submit the results of all effluent monitoring that is specified by the permit. Monitoring results should be compiled in the form and manner established by the letter granting coverage and submitted to the Department's office identified in the letter. Usually, the Department will include blank discharge monitoring report forms with the letter. The return address will be specified on the blank monitoring report forms. The Department requires the submittal of monitoring results by the 15th day of the month following the month during which the last day of

discharge occurred. For example, if the discharge starts on May 15th and ends August 4th, the permittee must submit monitoring results by the 15th of September.

In addition to the above reporting requirements, any exceedances of the Short Duration Discharge GP's effluent limitations must be reported verbally within 24 hours and in writing within 5 days of the permittee becoming aware of the noncompliance (see the GP's Standard Requirement 4.8).

Water Treatment Additives: Water treatment additives vary from innocuous to highly toxic. Only additives that have been reviewed and approved in writing by the Department may be discharged under the Short Duration Discharge GP. Changing the type or quantity of additives discharged must also be approved by the Department prior to initiating the change.

Under the Short Duration Discharge GP the Department will approve the use of a water treatment additive for a discharge to a surface water only when the resulting discharge is not toxic to aquatic organisms and meets all water quality standards. Due to their toxicity, it is very unlikely that the Department will approve additives containing biocides for discharges to surface waters.

For discharges to groundwater, the Department will not approve the use of a water treatment additive if the discharge under the Short Duration Discharge GP would exceed any of the preventive action limits found in ch. NR 140, Wis. Adm. Code.

To seek the Department's approval for the discharge of an additive, a facility should submit the additive's commercial name, application rate, anticipated discharge concentration and frequency of use. If the discharge is to a surface water, the facility should also submit toxicity information consisting of at least one 48-hour LC₅₀ or EC₅₀ value for *daphnia magna*, and one 96-hour LC₅₀ or EC₅₀ value for either fathead minnow, rainbow trout or bluegill. It is advantageous for the facility seeking approval to include a 96-hour LC₅₀ or EC₅₀ value for rainbow trout with the submitted information.

3 MONITORING REQUIREMENTS and EFFLUENT LIMITATIONS

The Short Duration Discharge GP imposes different conditions for surface water and groundwater discharges. Effluent limitations and monitoring requirements for discharges to surface waters are included in Section 3.1 of the Short Duration Discharge GP. Surface water discharges include discharges to ditches, storm sewers and pipes that convey wastewater to creeks, streams, rivers and lakes in Wisconsin.

Section 3.2 of the Short Duration Discharge GP covers discharges to groundwater. Examples of groundwater discharges include wastewater infiltration from irrigation, drain fields, ditches, and ponds that may impact water beneath the ground's surface.

3.1 SURFACE WATERS DISCHARGES

Flow Rate: The Short Duration Discharge GP requires the permittee to estimate the flow rate (gallons per day or gpd) of its discharge. The permittee must provide a reasonable approximation of the rate of flow using any one of the following methods: (a) a water balance; (b) an uncalibrated weir; (c) calculations from the velocity and cross section of the discharge; (d) intake water meter readings where the intake, or a specific portion of it, is discharged; (e) discharge water meter readings; and (f) any of the more complex methods listed in section NR 218.05(1), Wis. Adm. Code, such as a magnetic flow meter, Parshall flume, venturi meter or calibrated weir. The Department may approve additional methods for estimating flow in its authorization letter.

BOD₅: The discharge must meet a daily maximum effluent limitation for 5-day biochemical oxygen demand (BOD₅) of 40 mg/L. The BOD₅ limit is based on the ability of a secondary biological treatment system to remove BOD₅ from the discharge to concentrations below 40 mg/L.

The Department anticipates that potential discharges with BOD₅ concentrations greater than 40 mg/L will be hauled to a municipal wastewater treatment system rather than being discharged under the authorization of the Short Duration Discharge GP.

TSS: The discharge must meet a daily maximum effluent limitation for total suspended solids (TSS) of 40 mg/L. The TSS limit is based on the ability of simple settling equipment to easily remove suspended solids from the discharge to concentrations below 40 mg/L. Water appears clear at 40 mg/L of TSS.

Oil and Grease: The discharge must meet a daily maximum effluent limitation for oil and grease of 15 mg/L. The oil and grease effluent limitation is based on the effluent quality achievable with simple oil/water separation equipment.

pH: The pH of the discharge must fall within the range of 6.0 to 9.0 standard units. Methods for adjusting pH are readily available and are quite capable of complying with the pH limits. The limits are equivalent to water quality criteria for surface waters classified for fish and aquatic life.

Sample Frequency: The sample frequency for flow and all other parameters is monthly. Monitoring must be performed during each calendar month that discharge occurs. For example, if the discharge starts on May 15th and ends August 4th, the permittee must monitor the discharge at least once during the months of May, June, July and August. If the discharger monitors its discharge more frequently than monthly, it must report the results to the Department.

3.2 GROUNDWATER DISCHARGES

Flow: The Short Duration Discharge GP requires the permittee to estimate the flow rate (gpd) of its discharge to groundwater. Allowable methods for estimating the flow rate of a groundwater discharge are the same as those allowed for discharges to surface waters (see above).

Oil and Grease: The permittee must meet a daily maximum effluent limitation of 15 mg/L for oil and grease. The oil and grease effluent limitation is based on the effluent quality achievable with simple oil/water separation equipment.

Sample Frequency: The sample frequency for flow and all other parameters is monthly. Monitoring must be performed during each calendar month that discharge occurs.

4 STANDARD REQUIREMENTS

The standard requirements contained in the Short Duration Discharge GP are a group of conditions that apply to all discharges covered by a WPDES discharge permit. All of the GP's standard requirements are specified in Wisconsin Administrative Code or Statutes. Most are taken from ch. NR 205, Wis. Adm. Code. Included are requirements for reporting noncompliance, reporting planned changes that may alter the discharge, and discharge sampling and testing procedures.

5 ADDITIONAL COMMENTS

Pursuant to s. NR 205.07 (1)(d), the permittee must allow an authorized representative of the Department, upon the presentation of credentials, to enter the permittee's premises, have access to records, and inspect and monitor the discharge.

Any work performed in wetland areas or within areas subject to local flood plain and shoreland regulations must conform to all applicable county or local ordinances. All applicable state permits and/or contracts required by chs. 30, 31 and 87, Wis. Stats. and sections 281.15, 281.17(10), 281.36 and 281.37, Wis. Stats. or Wis. Adm. Code adopted under these laws, and applicable federal permits must be obtained as necessary.

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