



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) INDUSTRIAL PERMITTING VARIOUS LOCATIONS THROUGHOUT TEXAS, OKLAHOMA, & LOUISIANA (& EXPANDING!)

BRIEF DESCRIPTION OF SERVICES:

Wright Environmental Services (Wright) is retained by a major national truck stop client to manage their state-level National Pollutant Discharge Elimination System (NPDES) industrial wastewater and stormwater permitting and compliance. Our client voluntarily installs oil/water separators at all of their truck stop locations as a best management practice. The oil/water separators are installed to receive residual oily substances along with pavement wash water runoff and limited amounts of stormwater runoff from the pavement rather than just allowing the runoff to flow offsite. Runoff is collected by storm drains located in the covered truck refueling area and/or floor drains in the tire service shop and is routed through subsurface drainage line(s) to an oil/ water separator.

Oil/water separators are designed to separate the oil from the water, retain the oil for later transport to and disposal at a permitted disposal facility, and discharge the water to either a municipal sanitary sewer system or surface drainage at the Site. The need for NPDES permitting for this process arises from the use of oil/water separators in locations where there is not a municipal sanitary sewer to receive the discharged water.



The level of effort, cost, timeframe for approval, and monitoring and reporting requirements associated with the NPDES permitting process vary by state. Wright has permitted the discharge of water from oil/water separators at several of our client's truck stop facilities located in Texas, Oklahoma, and Louisiana and is working to expand our permitting services to other states as client needs arise.

INDIVIDUAL AND GENERAL PERMITTING:

The permitting process includes coordination with the state regulatory agency to prepare a state-level NPDES permit application for individual coverage or a Notice of Intent for authorization to discharge water (effluent) meeting established water quality criteria to the surface drainage under an appropriate state-level general permit. Both types of coverage, individual and general, typically require payment of annual permit renewal fees which vary by state and sometimes permit complexity and/or effluent characteristics.



Obtaining general permit coverage is a comparatively simpler and quicker approach for permit authorization and is the best solution for our client's sites located in states such as Louisiana which provide a general permitting mechanism for this type of discharge. Coverage under a State-issued general permit generally requires submittal of an application fee and form(s) describing the volume and characteristics of the influent water, the collection and treatment processes, the discharge volume and characteristics, and the flow path to the nearest classified segment of a surface water body. Maps depicting the facility, the collection and treatment system, the flow path of the discharge to the nearest receiving water body, and the surrounding topography are typically required to be submitted with the application.

General permits are reissued every 5 years, and a facility's coverage can be extended under a reissued general permit by submitting a notice of intent to renew coverage along with the appropriate fee(s).

Individual permitting is a more complex and time consuming process to complete but is required by states including Texas and Oklahoma for this type of discharge. Wright personnel are continuously working with state agencies to make the process as efficient as possible for our client. Individual permits require payment of a fee and preparation of forms and maps similar to but more involved than the forms and maps required to apply for authorization to discharge under a general permit. Individual permits usually require some form of public notice before the permit can be approved by the issuing agency. Requirements vary by state but can include publishing a notice in the local newspaper, leaving copies of the permit application and/or notice in a public location for viewing, mailing notices to adjacent and nearby landowners, and/or holding a public meeting. Individual permits are generally issued for 5 years of coverage, and a facility's coverage can be amended and/or extended by reapplying within the timeframe specified by the agency. This usually involves submitting a notice of intent to renew coverage along with the appropriate fee(s).

COMPLIANCE MONITORING, SAMPLING, AND REPORTING:

States require periodic monitoring, sampling, and reporting for individual and general permits to ensure compliance with the terms of the permit. These compliance requirements vary in frequency and the specific parameters required to be sampled and reported. Monitoring, sampling, and reporting is generally required on a monthly or quarterly basis. pH, oil and grease, and total suspended solids are the most common water quality parameters required to be sampled for these permits. Discharge monitoring reports (DMRs) are electronically prepared and submitted through each state's online data portal. Wright conducts all of these services for our clients up to the signing and submittal of the reports, which must be done by an authorized signatory of the client.

