

Alaska Department of Environmental Conservation
Division of Water



Module 4A

Permitting Requirement for GP Post Authorization or IP Issuance

2012 SEAFOOD PROCESSING WASTE PERMITTING & COMPLIANCE WORKSHOP

Anchorage, Alaska • February 28-29, 2012

Module 4A – Permittee Requirement for GP Post Authorization or IP Issuance

MODULE 4A



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Module 4A Objectives

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- **Brief** overview of general requirements to stay in compliance with permit requirements
- **Brief** overview of permit maintenance and compliance requirements for permittees.
- **Briefly** review current permit monitoring and sampling requirements.

Module 4A – What You Will Learn

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- Key individual permit requirements for staying in compliance
- Key general permit requirements
- Requirements for APDES compliance reporting
- Sampling and monitoring requirements for the Offshore Permit.

Individual Permit Post Issuance

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- Existing (administratively extended permit)
- Current

Individual Permit Post Issuance

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- Existing (administratively extended permit)
 - Means a complete application was submitted prior to expiration
 - DEC accepted NPDES application forms deemed complete by EPA prior to primacy transfer
 - Supplemental information might still be needed for DEC to reissue
 - Mixing Zone Application (Form 2M)

Individual Permit Post Issuance

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- Existing (administratively extended permit)
 - Permit conditions/requirements remain in force
 - Continue monitoring in accordance with permit
 - If monitoring was year of permit specific talk to DEC about the need to continue the monitoring
 - Example Years 2 & 4 of the permit perform....

Individual Permit Post Issuance

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- Existing (administratively extended permit)
 - Review latest application submittal for changes to operation or process
 - Supplement application with missing information

Individual Permit Post Issuance

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- Current Permit
 - Comply with permit conditions
 - Submit complete renewal application at least 180 days prior to permit expiration
 - Collect data required by the application form even if permit did not require the specific monitoring
 - Future permit should require all application required monitoring

Individual Permit Post Issuance

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- Current Permit
 - Only APDES application forms acceptable
 - <http://dec.alaska.gov/water/wwdp/seafood/seafoodww.html>
 - Administratively complete application has to be received prior to permit expiration date
 - Even if an administratively complete application is received, more information may be required to achieve technical completeness
 - Review of mixing zone modeling for example

AKG520000 Permit Post Issuance

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- Facilities discharging more than 3.0 nm from shore or baseline (whichever is greater)
 - Should have AKG5240000 permit coverage
 - Coverage under AKG520000 should be terminated/retired
 - Submit a Notice of Termination form to DEC
 - <http://dec.alaska.gov/water/wwdp/seafood/docs/NOT.pdf>

AKG520000 Permit Post Issuance

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- Facilities discharging more than 3.0 nm from shore or baseline (whichever is greater)
 - To determine if covered under AKG520000
 - Go to <http://dec.alaska.gov/Applications/Water/WaterPermitSearch/Search.aspx> and enter facility name or permit number
 - Receiving a DEC Permit invoice

AKG520000 Permit Post Issuance

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- Facilities discharging in waters 0.5 nm from shore to 3.0 nm from shore or baseline should have:
 - current coverage under AKG523000
 - or
 - have submitted an AKG523000 NOI
 - AKG523000 NOIs were due December 1, 2011
 - Be sure DEC knows if continuing coverage under AKG520000 is needed for discharges less 0.5 nm from shore

AKG520000 Permit Post Issuance

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Facilities discharging in waters between 0.5 nm from shore and 3.0 nm from shore or baseline will continue under the AKG520000 administratively extended permit until:

- Coverage under AKG523000 is granted
- An individual permit is issued
- Coverage under AKG520000 is terminated

AKG520000 Permit Post Issuance

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Facilities discharging in waters less than 0.5 nm from shore will continue under the AKG520000 administratively extended permit until:

- Coverage under AKG521000 or AKG525000 is granted
- An individual permit is issued
- Coverage under AKG520000 is terminated

Permit Compliance/Maintenance

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AKG520000 Material changes to operations

- Updated AKG520000 NOIs must be submitted to DEC before changes in discharge/processing occur
 - <http://dec.alaska.gov/water/wwdp/seafood/seafoodww.html>
- Clearly identify changes/modifications
- Submit scanned versions of modified AKG520000 NOIs to dec.water.wqpermit@alaska.gov and mail signed originals to Anchorage DEC Office

Permit Compliance/Maintenance

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AKG523000 Material changes to operations

- Modified AKG523000 NOIs must be submitted to DEC before changes in discharge/processing occur
 - <http://dec.alaska.gov/water/wwdp/seafood/seafoodww.html>
- Clearly identify changes/modifications
- Use OASYS to submit modified eNOI (Module 3C)
or
- Submit scanned versions of modified AKG523000 NOIs to dec.water.wqpermit@alaska.gov and mail signed originals to Anchorage DEC Office

Permit Compliance/Maintenance

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An operator shall notify DEC when any material change is proposed to occur including, but not limited to change in:

- Owner
- Operator
- Authorized representative name/title
- Discharge location
- Discharge amount

Permit Compliance/Maintenance

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Permit Transfers

- Use permit transfer form to notify changes in responsible party
 - IPs and GP Authorizations
 - http://dec.alaska.gov/water/wwdp/online_permitting/pdfs/Name_Change-Permit_Transfer_form.pdf

Permit Compliance/Maintenance

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Permit Transfers

- Signed by Original Permittee and New Permittee
- Original Permittee is Responsible until DEC accepts transfer
 - DEC will not unreasonably limit a transfer

AKG520000 Permit Post Issuance

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- It is DEC intent to issue updated authorizations after receipt of a modified NOI
- DEC will post authorizations at <http://dec.alaska.gov/Applications/Water/WaterPermitSearch/Search.aspx>
- Documents posted include
 - Authorization document
 - Modified NOI
 - NOI Attachments

AKG520000 Permit Post Issuance

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Permit Documents to be kept on board or at facility

- Updated Authorization
- Most Recent NOI
 - Should match NOI posted on-line
- More discussion in Module 7

AKG520000 Permit Post Issuance

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Permittee Self-Reporting Tools

Important Web Resource

<http://dec.alaska.gov/water/Compliance/permittee.html>

- AKG520000 Annual Report Form
- Noncompliance form
- Other forms

APDES Permit Maintenance

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AKG 520000 Annual Report

The annual report will include the following information:

- APDES permit number
- Company name
- Owner name
- Operator name
- Facility name
- Authorized representative name\title
- USCG vessel number (vessel only)
- Mailing address
- Telephone number(s)
- Email address
- Facsimile number.

APDES Permit Maintenance

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AKG520000 Annual Report

- Noncompliance Summary for the year
- Daily location information while processing (vessels)
 - Date of Discharge
 - Name of Receiving Water
 - Latitude/Longitude Coordinates
 - decimal degrees
 - Accuracy of coordinates shall be at least within ± 100 meters (5 decimals)
 - Depth of Discharge
 - Provide range of depths if processing while moving

APDES Permit Maintenance

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AKG520000 Annual Report

Monthly summary and total **annual** summary of production and discharge information:

- Number of processing days
- Raw products processed
- Finished product
- Discharged seafood processing waste
 - (raw product minus finished product)
- Location- Coordinates and Water Body Name

Product amounts to be reported in pounds.

APDES Permit Maintenance

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Annual Report

Information required to be reported in an Annual Report is not considered business confidential

APDES Permit Maintenance

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AKG523000 Annual Report Submittals

The annual report will also include the **daily** location and discharge information:

- The receiving water name, date, and whether the facility was stationary or in transit.
- The estimated or measured volume of wastewater discharged (in million gallons per day) for each seafood processing waste outfall.
- A bathymetric chart of the National Oceanic and Atmospheric Administration (NOAA) delineating the daily location of the processing facility and the depth of the seafloor within 1 nm of the discharge location.

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	A	B	C	D	E	F	G	H	I	J	K	L	M	N
	Date	Stationary or In-Transit	Receiving Water Name	Latitude	Longitude	Type of raw product processed	Processes applied to raw product	Amount of raw product processed	Amount of finished product	Amount of waste discharged	Number of Hours of Seafood Processing	Seafood Processing Waste Discharge Flow		
1														
2														
3														
4														
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APDES Permit Maintenance

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AKG523000 Annual Report Submittals

- Monitoring Reports:
 - Outfall monitoring report and pre-operational check
 - Marine sanitation device effluent monitoring report
 - Graywater effluent monitoring report
 - Receiving water monitoring report
- Summary Reports:
 - Waste Conveyance & Grinder System logs
 - Sea Surface Monitoring logs
 - Seafloor Survey Applicability
 - Noncompliance Summary
 - Endangered and Threatened Species Incident Summary
- Sampling and Monitoring Digital pictures on a CD or DVD

APDES Permit Maintenance

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AKG523000 Annual Report Submittals

- Updated NOI if applicable. Only required if there are material changes.
- Signatory requirements. The annual report shall be signed by a principal officer or a duly authorized representative of the operator in accordance with Appendix A, Part 1.12.
- If secondary by-products are produced, such as meal, it is the operator's responsibility to estimate or measure the volume lost to the atmosphere through water vapor. The calculation used to measure water vapor or to estimate the water vapor shall be included with the annual report.
- Provide the total pounds of ammonia or Freon used, and a summary of any occurrences of leaks or breaks in the refrigerator condenser system.

Discharge Monitoring

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The purpose of the effluent/receiving water monitoring is to better understand the characteristics of the wastewater discharges from seafood processors.

The estimated flow rate of the effluent wastestream will need be recorded at the time of the sampling event.

Discharge Monitoring

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- Monitoring
 - seafood processing discharges
 - graywater system discharges
 - marine sanitation devices
 - samples collected during seafood processing operations prior to entering receiving waters

Discharge Monitoring

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- Monitoring
 - Analysis under the AKG523000 permit is dependent on processing location, onboard lab equipment, and proximity to airports and/or DEC certified labs (drinking water certification).
 - Analysis under the AKG521000 and AKG525000 will likely not be dependent upon processing location for shorebased facilities.

Mixing Zone Monitoring

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The purpose of the mixing zone samples is to determine if the prescribed mixing zone is adequate to protect the receiving water from exceedances of the State Water Quality Standard (WQS).

Mixing zone samples will be collected at various depths at the edge of the mixing zone downstream of the effluent outfall.

Receiving Monitoring

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The receiving water samples are used to determine ambient water quality in the body of water where the discharge is occurring.

Receiving Water Monitoring

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Samples shall be collected in conjunction with effluent waters sampling and be comprised of two sampling locations, with two depths at each location.

Permit Monitoring

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Additional information for many of the sampling and monitoring requirements will be covered in more detail in subsequent modules.

End of Module 4A

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