

Indiana Department of Environmental Management

Office of Water Quality

Permits Branch

National Pollutant Discharge Elimination System (NPDES) Program Implementation

- Goal: Ensure point source discharges into waters of the state maintain water quality standards in 327 IAC 2 and at minimum comply with technology- based limitations in 327 IAC 5-5-2.
- Branch Sections:
 - Municipal NPDES Permits
 - Combined Sewer Overflow (CSO) Program
 - 109 communities required to develop and implement plans to reduce or eliminate untreated sewer overflows
 - Industrial NPDES Permits
 - Facility Construction & Engineering Support
 - Permits Administration
 - General Permits – development & implementation
 - Public Notice Coordination (website + newspaper notices)
- Water Quality Standard Initiatives (327 IAC 2)
 - Stream Modeling
 - Variances (individual, SMV, 316(a), 316(b))
 - Antidegradation Review
- Permit Categories:
 - “Individual” NPDES permits – 327 IAC 5
 - Industries, Municipalities, Semi-Public, State/Federal Facilities
 - “General” NPDES permits – 327 IAC 15 and 5
 - Provide coverage for categories of activities with similar discharge characteristics (e.g. stone quarries, coal mines, hydrostatic testing of pipelines, temporary discharges)
 - “Industrial Wastewater Pretreatment” – 327 IAC 5-16
 - Significant Industrial Users and Categorical Industrial Users that discharge into municipally-owned sewer systems, unless city has a federally-delegated pretreatment program
 - “Construction” permits – 327 IAC 3
 - Review and approval of construction plans and specs for sewer systems and wastewater treatment facilities

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- Increased Quality & Reduced Processing Time of Permits
 - No EPA-defined permit “backlog”
 - Positive Program Quality Review from EPA
 - Improved quality and consistency in permits through template work and section collaboration
- Focus on Nutrient Loading Reductions & Awareness
 - Implementation of a 1.0 mg/l total phosphorus (TP) limitation in all major sanitary NPDES permits and select Industrial facilities, leading to significant TP load reductions from NPDES facilities
 - Total Nitrogen monitoring added to certain permits, due to EPA watershed nutrient initiatives
- Antidegradation Implementation
 - Increased protection for high quality waters
 - Often more stringent discharge requirements for new discharges
- Combined Sewer Overflow Program
 - 63 of 109 communities fully implemented controls

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Current and future challenges for the Permits Branch

- Current:
 - Limited Resources ↔ Staff retention
 - EPA inconsistency
 - Presentation of conceptual approaches and priorities without implementation support
 - Rule updates needed
 - Increasing complexity and increased workloads despite limited resources
 - Excessive litigation as a tactic
- Future:
 - Emerging contaminants
 - New mandates