Attachment 1: What Kind of Application Do You Need?

Publically Owned Treatment Works (POTW) or facilities that are similar to POTWs, but which do not meet the regulatory definition of "publicly owned treatment works" (like private domestics), are required to submit EPA Form 2A and EPA Form 2S.

http://www.epa.gov/npdes/pubs/final2a.pdf

http://www.epa.gov/region8/water/npdes/pdf/final2s.pdf

Industrial or Commercial Facilities – Renewing Facilities Require EPA Form 1 and EPA Form 2C

http://www.epa.gov/npdes/pubs/form_1.pdf

http://www.epa.gov/npdes/pubs/3510-2C.pdf

Aquiculture/Fish Hatchery Facilities - Require EPA Form 1 and EPA Form 2B

http://www.epa.gov/npdes/pubs/form_1.pdf

http://www.epa.gov/npdes/pubs/cafo_fedregstr_form2b.pdf

Facilities which do not discharge process wastewater, such as sanitary wastes or noncontact cooling water, but not from POTW's, educational, medical or commercial laboratories must submit EPA Form 1 and EPA Form 2E. If you submit EPA Form 2E, and you check the box "sanitary wastes" on Line III.A. of the form, then in addition to EPA Forms 1 and 2E, you also need to submit EPA Form 2S

http://www.epa.gov/npdes/pubs/form_1.pdf

http://www.epa.gov/npdes/pubs/3510-2E.pdf

http://www.epa.gov/region8/water/npdes/pdf/final2s.pdf

Stormwater Associated with Industrial Activity – Require EPA Form 1 and From 2F

http://www.epa.gov/npdes/pubs/form_1.pdf

http://www.epa.gov/npdes/pubs/3510-2F.pdf

Attachment 2: Application Data Frequently Asked Questions?

1. **What test methods must be used?** Analysis for NPDES permit applications must be done according to an EPA-approved test method at 40 CFR 136, unless otherwise specified.

2. **What is the minimum level of test sensitivity?** The test method chosen must be capable of detection down to the Minimum Quantification Levels (MQL's) in Attachment 4. If you report "less than" or "not detected" at a level greater than the MQL for that parameter, you will either be required to submit additional information at the appropriate MQL or evaluation of the need for permit limits may be made assuming your discharge contains pollutants at your reported detection limit.

3. **Is there an advantage to supplying more than the minimum number of samples?** Yes, larger data sets provide more statistically defensible information on the variability of the pollutants in your discharge and may allow EPA to rule out the need for a permit limit for a particular parameter. Smaller data sets require larger statistical multipliers than larger ones. For example, a single data set may require a multiplier greater than 6 to account for variability, whereas a data set of 10 samples could be as low as 1.7. Significant reduction of the statistical multiplier occurs as the data set is greater than 5 data points.

4. **Can I use previously collected data for the application**? Application data must be representative of current discharges. Facilities that submit EPA Form 2C may not include data older than three (3) years from the time of application. Facilities that submit EPA Form 2A may not include data that is older than four and one-half (4-½) years from time of the application. You can also use data from monitoring required under your current permit for your application providing they meet the timeframe requirement noted above.

5. **Are there any guidelines on how far apart samples should be taken for applications?** Yes, publically owned treatment works (POTWs) must provide at a minimum, data from at least three samples. At least two of the samples used to complete the effluent testing information questions must have been taken no fewer than four (4) months and no more than eight (8) months apart. This requirement assures that two (2) samples will be analyzed in different climate seasons. For example, if your permit application is due to EPA September 30th, you could take one sample in January, the second sample in May, and the third sample in July of the year the application is due.

Attachment 3: Minimum Quantification Levels (MQLs)

The following Minimum Quantification Levels (MQL's) are to be used for reporting pollutant data for NPDES permit applications and/or compliance reporting.

POLLUTANTS	MQL µg/l	POLLUTANTS	MQL µg/l
METALS, RADIOACTIVITY, CYANIDE and CHLORINE			
Aluminum	2.5	Molybdenum	10
Antimony	60	Nickel	0.5
Arsenic	0.5	Selenium	5
Barium	100	Silver	0.5
Beryllium	0.5	Thalllium	0.5
Boron	100	Uranium	0.1
Cadmium	1	Vanadium	50
Chromium	10	Zinc	20
Cobalt	50	Cyanide	10
Copper	0.5	Cyanide, weak acid dissociable	10
Lead	0.5	Total Residual Chlorine	33
Mercury *1	0.0005		
	0.005		
DIOXIN			
2,3,7,8-TCDD	0.00001		
VOLATILE COMPOUNDS			
Acrolein	50	1,3-Dichloropropylene	10
Acrylonitrile	20	Ethylbenzene	10
Benzene	10	Methyl Bromide	50
Bromoform	10	Methylene Chloride	20
Carbon Tetrachloride	2	1,1,2,2-Tetrachloroethane	10
Chlorobenzene	10	Tetrachloroethylene	10
Clorodibromomethane	10	Toluene	10
Chloroform	50	1,2-trans-Dichloroethylene	10
Dichlorobromomethane	10	1,1,2-Trichloroethane	10
1,2-Dichloroethane	10	Trichloroethylene	10
1,1-Dichloroethylene	10	Vinyl Chloride	10
1,2-Dichloropropane	10		
ACID COMPOUNDS			
2-Chlorophenol	10	2,4-Dinitrophenol	50
2,4-Dichlorophenol	10	Pentachlorophenol	5
2,4-Dimethylphenol	10	Phenol	10
4,6-Dinitro-o-Cresol	50	2,4,6-Trichlorophenol	10

POLLUTANTS	MQL µg/l	POLLUTANTS	MQL µg/l
		BASE/NEUTRAL	
Acenaphthene	10	Dimethyl Phthalate	10
Anthracene	10	Di-n-Butyl Phthalate	10
Benzidine	50	2,4-Dinitrotoluene	10
Benzo(a)anthracene	5	1,2-Diphenylhydrazine	20
Benzo(a)pyrene	5	Fluoranthene	10
3,4-Benzofluoranthene	10	Fluorene	10
Benzo(k)fluoranthene	5	Hexachlorobenzene	5
Bis(2-chloroethyl)Ether	10	Hexachlorobutadiene	10
Bis(2-chloroisopropyl)Ether	10	Hexachlorocyclopentadiene	10
Bis(2-ethylhexyl)Phthalate	10	Hexachloroethane	20
Butyl Benzyl Phthalate	10	Indeno(1,2,3-cd)Pyrene	5
2-Chloronapthalene	10	Isophorone	10
Chrysene	5	Nitrobenzene	10
Dibenzo(a,h)anthracene	5	n-Nitrosodimethylamine	50
1,2-Dichlorobenzene	10	n-Nitrosodi-n-Propylamine	20
1,3-Dichlorobenzene	10	n-Nitrosodiphenylamine	20
1,4-Dichlorobenzene	10	Pyrene	10
3,3'-Dichlorobenzidine	5	1,2,4-Trichlorobenzene	10
Diethyl Phthalate	10		
		PESTICIDES AND PCBS	
Aldrin	0.01	Beta-Endosulfan	0.02
Alpha-BHC	0.05	Endosulfan sulfate	0.02
Beta-BHC	0.05	Endrin	0.02
Gamma-BHC	0.05	Endrin Aldehyde	0.1
Chlordane	0.2	Heptachlor	0.01
4,4'-DDT and derivatives	0.02	Heptachlor Epoxide	0.01
Dieldrin	0.02	PCBs	0.2
Alpha-Endosulfan	0.01	Toxaphene	0.3

(MQL's Revised November 1, 2007)

Footnotes:

*1 Default MQL for Mercury is 0.005 unless Part I of your permit requires the more sensitive Method 1631 (Oxidation / Purge and Trap / Cold vapor Atomic Fluorescence Spectrometry), then the MQL shall be 0.0005.

Attachment 4: Sample and Test Requirements for Human Health Pollutants for Dischargers in New Mexico

The human health strategy is designed to be a one-time analysis to demonstrate that the facility, under current operations and flow, does not have the reasonable potential to exceed human health criteria through screening of a minimum of one sample. At re-application, the applicant may provide a signed certificate that certifies that no changes in process, chemicals used or a change in the nature of the discharge has occurred since the last human health test was conducted and that the previous testing was at the same MQL as shown on Attachment 4. The certification must be signed by the appropriate signatory as described in 40 CFR Part 122.22, contained in Part III of the permit (Standard Conditions).

New Mexico has more stringent testing requirements than required by EPA permit application forms. In addition to the appropriate EPA forms pollutant test data required above, New Mexico has additional human health pollutant testing. The following pollutant test data are required, analyzed to the MQL's as shown in Attachment 4 below, as follows:

1) **For sanitary waste treatment plants which have a design flow less than 1 MGD (million gallons per day)**: Discharges are deemed to be no reasonable potential to cause or contribute to a violation of human health criteria. Therefore, no additional data are required.

2) **All industrial discharges, and municipal discharges greater than or equal to 1 MGD** MUST test according to the following:

a) **For discharges to an ephemeral or intermittent stream which will not enter into a perennial stream or a permanent water pool**, except in direct response to precipitation or runoff, the following persistent pollutants MUST be analyzed and reported in the application:

Antimony, dissolved (D), arsenic, (D), nickel, (D), selenium, (D), thallium, (D), zinc, (D), aldrin, benzo(a)pyrene, chlordane, 4,4'-DDT and derivatives, Dieldrin, 2,3,7,8-TCDD dioxin, hexachlorobenzene, PCBs, and tetrachloroethylene

b) **For all other discharges**, all pollutants listed below MUST be analyzed and reported in the application:

Antimony, (D), Arsenic, (D), Nickel, (D), Selenium, (D), Thallium, (D), Zinc, (D), Cyanide, weak acid (D), 2,3,7,8-TCDD dioxin, Acrolein, Acrylonitrile, Benzene, Bromoform, Carbon Tetrachloride, Chlorobenzene, Chlorodibromomethane, Chloroform, Dichlorobromomethane, 1,2 Dichloroethane, 1,1 Dichloroethylene, 1,2 Dichloropropane, 1,3 Dichloropropene, Ethylbenzene, Methyl Bromide, Methylene Chloride, 1,1,2,2 Tetrachloroethane, Tetrachloroethylene, Toluene, 1,2 trans Dichloroethylene, 1,1,2 Trichloroethane, Trichloroethylene, Vinyl Chloride, 2-Chlorophenol, 2,4-Dichlorophenol, 2,4-Dimethylphenol, 2-Methyl-4,6-Dinitrophenol , 2,4-Dinitrophenol, Pentachlorophenol, Phenol, 2,4,6-Trichlorophenol, Acenaphthene , Anthracene, Benzidine , Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Bis(2-chloroethyl)Ether, Bis(2-chloroisopropyl)Ether, Bis(2-ethylhexyl)Phthalate, Butyl Benzyl Phthalate, 2-Chloronapthalene, Chrysene, Dibenzo(a,h)anthracene, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-

Dichlorobenzene, 3,3'-Dichlorobenzidine, Diethyl Phthalate, Dimethyl Phthalate, Dibutyl Phthalate, 2,4-Dinitrotoluene, 1,2-Diphenylhydrazine, Fluoranthene, Fluorene, Hexachlorobenzene, Hexachlorobutadiene, Hexachlorocyclopentadiene, Hexachloroethane, Indeno(1,2,3-cd)Pyrene, Isophoron, Nitrobenzene, n-Nitrosodimethylamine, n-Nitrosodi-n-Propylamine, n-Nitrosodiphenylamine, Pyrene, 1,2,4-Trichlorobenzene, Aldrin, Alpha-BHC, Beta-BHC, Gamma-BHC, Chlordane, 4,4'-DDT and derivatives, Dieldrin, Alpha-Endosulfan, Beta-Endosulfan, Endosulfan sulfate, Endrin, Endrin Aldehyde, Heptachlor, Heptachlor Epoxide, PCBs, and Toxaphene.