

# **Application Review Checklist for New and Existing Publicly Owned** Treatment Works Submitting Form 2A



Is the facility a new or existing publicly owned treatment works? If yes, complete Form 2A (New and Existing Publicly Owned Treatment Works). If the facility is also a treatment works treating domestic sewage, you must also complete Form 2S (New and Existing Treatment Works Treating Domestic Sewage). See the Form 2S instructions for more information.

This checklist is a tool designed for NPDES permit applicants to aid in the submission of a complete NPDES permit application. The items in the checklist reflect elements that applicants often fail to complete or complete incorrectly. Applicants are encouraged to review the contents of the checklist prior to completing the form(s) and submittal of the application package. Note that "[a]n application for a permit is complete when the Director receives an application form and any supplemental information which are completed to his or her satisfaction." (40 CFR 122.21(e))

## **INSTRUCTIONS** Did you review the Form 2A General Instructions? Did you review the Form 2A Line-by-Line Instructions? Did you review the Form 2A General Instructions for Reporting, Sampling and Analysis? **ATTACHMENTS** Did you attach a topographic map? (Item 2.3) **Note:** This is required for applicants with a design flow ≥ 0.1 million gallons per day (mgd). Refer to the line-by-line instructions for Item 2.3 for the map requirements. **Resource:** http://nationalmap.gov/ Did you attach a process flow diagram or schematic? (Item 2.4) **Note:** This is required for applicants with a design flow ≥ 0.1 mgd. Refer to the line-by-line instructions for Item 2.4 for the process flow diagram requirements. Did you complete Table F by providing the required information for each significant industrial user (SIU) that discharges to the POTW? Note: This is required for applicants that receive discharges from SIUs unless you have submitted a pretreatment program annual report or pretreatment program with substantially identical information. Refer to the line-by-line instructions for Section 4 for more information. Do your additional attachments (if any) provide the required information? Did you provide the information in a format consistent with the form?

### **EFFLUENT TESTING DATA (TABLES A THROUGH E)**

Form 2A requires applicants to collect and report data for the parameters and pollutants listed in Tables A through E, located at the end of Form 2A. See the line-by-line instructions for Section 3 and the General Instructions for Reporting, Sampling, and Analysis to determine which tables you must complete.

Did you enter the outfall number at the top		
the first page of each applicable table?		
Note: You must complete the applicable		
tables for each outfall at your facility.		

Tal	ble	Pollutants/Parameters	Who Completes?
A	4	Conventional pollutants, flow rate, and temperature	All applicants.
E	3	Additional conventional and non-conventional pollutants	Applicants with a design flow greater than 0.1 MGD.
C	C	Metals, cyanide, total phenols, volatile organic compounds, acid-extractable compounds, and base- neutral compounds	Applicants with a design flow greater than 1 MGD or that are required to have a pretreatment program.
C	)	Additional pollutants	Applicants who have been notified by their permitting authority to provide additional testing data.
E	≣	Whole effluent toxicity	Applicants with a design flow greater than 1 MGD or that are required to have a pretreatment program.

Did you use sufficiently sensitive methods approved under 40 CFR 136 for all quantitative data reported in Tables A through D (as applicable)?

**Note:** The application will not be deemed complete unless all required quantitative data are collected in accordance with sufficiently sensitive, EPA-approved analytical methods. Refer to the General Instructions for Reporting, Sampling, and Analysis for more information.

Resources: 40 CFR 136, www.nemi.gov, applicable water quality standards

□ Did you report effluent testing data in Tables A through D (as applicable) based on at least three samples taken within 4.5 years prior to the date of the permit application?

**Resources:** Your facility's laboratory reports and Discharge Monitoring Reports from the previous 4.5 years

□ Did you provide the results of at least four whole effluent toxicity tests in Table E?

**Note:** This is required for applicants with a design flow  $\geq 1$  mgd and applicants that have an approved pretreatment program.

**Resources:** Your facility's laboratory reports, 40 CFR 122.21(j)(5)(v)

- □ Do the values you reported in Tables A through E seem consistent with typical wastewater quality and your past performance (i.e., do the values appear to be the correct magnitude)?
- ☐ Did you review your data tables for the following common mistakes?
  - Incorrect long-term average and daily maximum values
  - Quantified values below known detection limits (see definition at 40 CFR 136.2(f))
  - Misplaced decimal points
  - Incorrect or inconsistent concentration units

#### **REVIEWING YOUR RESPONSES**

- ☐ Did you account for all outfalls and wastewaters that you are requesting to be permitted as a result of this application?
- □ Did you enter the EPA identification number and NPDES permit number (if you have them) and facility name at the top of the first page of the form and on all attachments?

Resource: https://www.epa.gov/frs

- Did you review the form to ensure that you have provided a response to every item (except those for which the form allows you to skip)?
- ☐ Did you complete the application checklist in Item 6.1 and indicate any attachments you are enclosing?

#### **CERTIFICATION STATEMENT**

□ Did the appropriate person, as specified at 40 CFR 122.22(a), sign the certification statement? (Item 6.2) **Note:** Refer to the line-by-line instructions for Item 6.2 for the signatory requirements.

**Resource:** 40 CFR 122.22