

December 20, 2004

Permits Workgroup Recommendations

Issue #1: Simplify permit approval/renewal process.

Conclusion of Issue # 1:

- A summary of the proposed changes is to be included with the final application. The permittee will be responsible for the summary.
- Instead of submitting the entire document, submit only the sections that changes are requested and when approved, incorporate the changes into the whole document for submittal. The initial submittal would be similar to a major modification request.
- The copy of the application that is distributed for public review will include the proposed changes in strikeout/underline and bold.
- Once the permit is approved, the facility will submit a clean copy (no strikeout/underline) because the strikeout/underline version is too difficult to go back and modify at a later date.

Issue #2: Evaluate facilities previous performance.

Conclusion of Issue #2:

- Make the history a part of the renewal. Making this information available for public review along with the renewal will help the facility by showing the improvements that the facility has made.

Issue #3: Simplify permitting for new regulations. When are facilities going to have to comply to the new regulations?

Conclusion of Issue #3:

- Allow the facility to address any changes to the regulations on the next permit renewal provided there are no substantial changes.

Issue #4: Exempt Woodwaste.

Conclusion of Issue #2:

- Exempt facilities that deal with yard/greenwaste as long as that facility has an approved BMP.

Issue #5: Alternate Daily Cover.

Conclusion of Issue #5:

- Provide a method for approving alternate daily cover without a modification. It should be easier to use alternate cover once the department has agreed to the use in principle. Provide a list of approved covers and be consistent for all permits.

Issue #6: Address Bioreactor landfills.

Conclusion of Issue #6:

- Maybe the regulations are adequate to address bioreactors as written with the exception of 711.D.1.g (liquid waste prohibition) and 711.B.4.b.i.

Issue #7: Alternate liners.

Conclusion of Issue #7:

- Remove 711.B.5.d.ii from the regulations to allow the approval of alternate liners for Type II facilities without the need for an exemption.

Issue #8: Stormwater design.

Conclusion of Issue #8:

- 711.A.3 provides design standards for the 24-hour/25-year storm event. The last sentence states “If the 24-hour/25-year storm-event is lower, the design standard shall be required.” It has been requested for this sentence to be removed.

Issue #9: Final elevations.

Conclusion of Issue #9:

- We discussed whether the final elevation provided is post or pre-settlement. The group came to a consensus that the elevation provided should be post-settlement at the time of cap placement. Clarification may be necessary.

Issue #10: Type II and Type III Separation facilities.

Conclusion of Issue #10:

- We are to clarify the distinction between Type II and Type III separation facilities. There is a loophole in the regulations regarding the classification of these facilities that needs to be addressed.

Issue #11: Major Modifications.

Conclusion of Issue #11:

- It was suggested that the criteria for determining if a modification is major or minor provided in 517.A.2 be reviewed to determine if some items need to be removed. For example, in order to avoid a major modification, facilities may request an unlimited service area or 24 hour operation when the intention is not to operate 24 hours per day.