



Water Permitting for Food Processing

Disclaimer!

- Determining if you need a permit can be difficult and frustrating for many businesses. This presentation is intended to help small businesses understand environmental permitting better.
- This presentation does not cover every scenario, and does not provide a definite answer to every issue.
- This presentation is not a determination on your need for a permit.



Objectives

Will discuss the following water issues:

- When an environmental water permit is needed
- What application is needed
- Where can you get the application
- Who are the permitting contacts



Who Needs A Permit?

- Discharges of wastewater to water of the state
- Certain discharges to a Publically Owned Treatment Works (POTW)
- On-site disposal of wastewater
- Certain Industrial Stormwater Discharges
- Construction activities disturbing 1 Acre or more



Direct
Discharge

Direct Discharges (NPDES)

- Discharges of wastewater to a Water of the State
- The definition of “wastewater” is extremely broad and covers almost any water generated from an industrial process. It also covers liquid, solid, and gaseous waste.
- In some cases, Permits can not be issued.

Pretreatment

No Discharge

Stormwater



Direct
Discharge

Direct Discharges (NPDES)

- Which Form do I complete?

- Form 1 – General Information
- Form 2C – Existing Industries
- Form 2D – New Dischargers
- Form 2E – Non-Process Wastewater
- Short Form D – Domestic Wastewaste ONLY

- For Industrial sources typically requires a Form 1 and Form 2C
- May require Antidegradation Analysis

Pretreatment

No Discharge

Stormwater

Direct
Discharge

Pretreatment

Pretreatment

- Industrial Users generate wastewater, perform various treatments onsite, then transport wastewater to a Publically Owned Treatment Works (POTW)
- The intent is to protect the collection system and treatment works
- “transport” can apply to waste hauled waste as well as

No Discharge

Stormwater

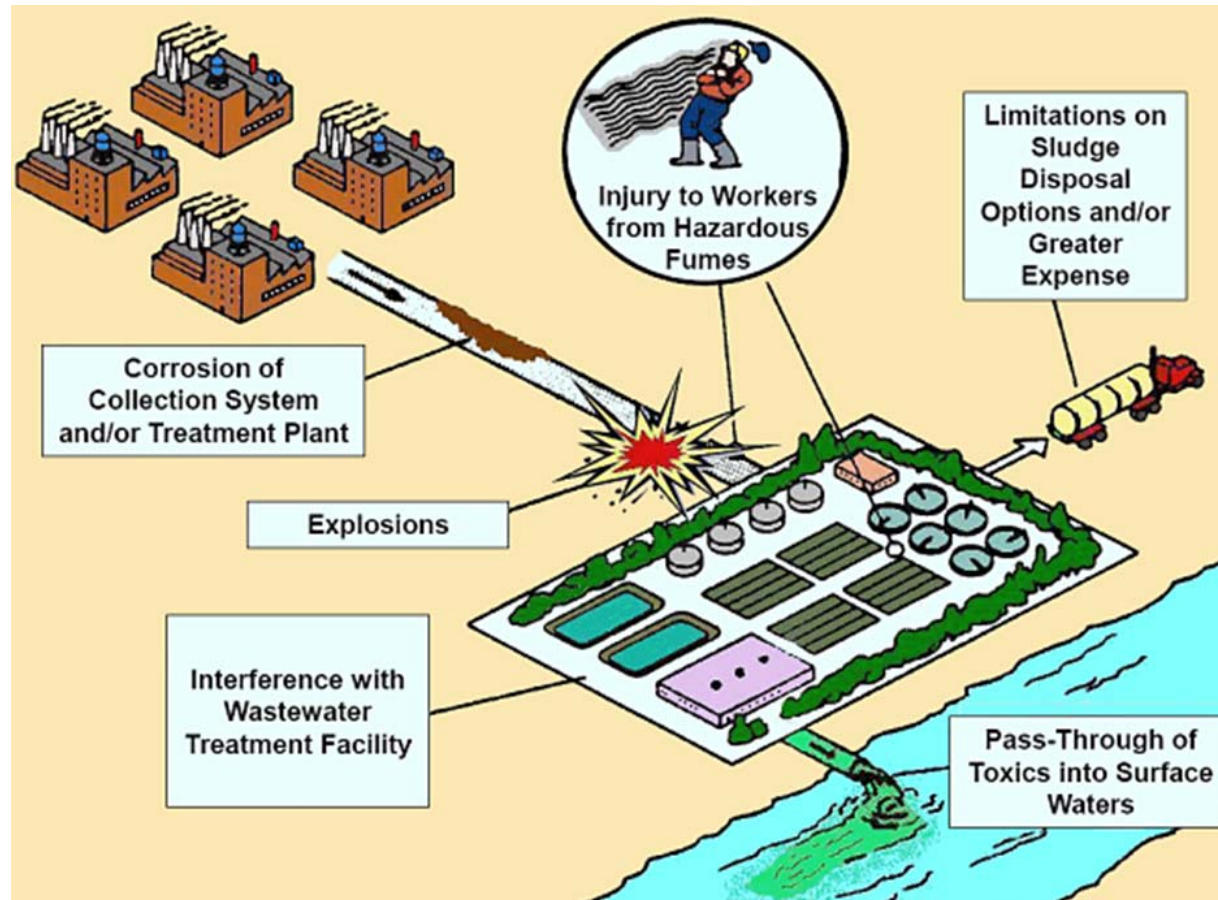
Direct Discharge

Pretreatment

No Discharge

Stormwater

Pretreatment



Direct
Discharge

Pretreatment

- Any industrial discharges to a Publically Owned Treatment Works may require an Pretreatment permit if
 - The discharge is a Categorical Industrial User (CIU)
 - Average Flow is greater than 25,000 GPD
 - Contributes 5% or more of the average hydraulic or organic capacity of the POTW
 - POTW designated the discharger due to reasonable potential to adversely affect the POTW or collection system

Pretreatment

No Discharge

Stormwater

Direct
Discharge

No Discharge

- Wastewater is treated, then disposed without a discharge to Waters of the State
- Wastewater is commonly disposed of through a spray field or drip field
- Fewer requirement than NPDES
- Will not require antideg

Pretreatment

No Discharge

Stormwater



Direct
Discharge

No Discharge

- Form 2-S Application is usually completed
- Separate form for domestic only discharges
- Complications?
 - Soil Conditions
 - Wastewater must be compatible
 - Odor or accumulation could be an issue
 - Buffer zones

Pretreatment

No Discharge

Stormwater

Direct
Discharge

Stormwater

- Stormwater is the runoff resulting from rain on industrial sites.
- This runoff picks up pollutants like trash, chemicals, oils, sediment that could make to rivers and streams.

Pretreatment

No Discharge

Stormwater



Direct
Discharge

Stormwater - Construction

- Any project disturbing 1 Acre or more will require coverage under a permit
- Small Construction - 1 Acre to up to 5 Acres
- Large Construction - 5 Acres or more REQUIRES NOI SUBMITTAL
- Both require
 - Stormwater Pollution Prevention Plan
 - Implementation of control measures
 - Site Specific Maps

Pretreatment

No Discharge

Stormwater



Direct
Discharge

Stormwater - Operational

- Industrial Stormwater in the required SIC codes can be covered by Baseline Stormwater General Permit
- Requires
 - Stormwater Pollution Prevention Plan
 - Implementation of control measures
 - Site Specific Maps
- Different requirements than Construction!

Pretreatment

No Discharge

Stormwater



Direct
Discharge

Pretreatment

No Discharge

Stormwater

SIC CODE	40 CFR 122.26b(14)	DESCRIPTION	EXCEPTIONS
-	i	Industries subject to storm water effluent guidelines	
24	ii	Lumber and wood products, except furniture	except 2434
26	ii	Paper and allied products	except 265 and 267
28	ii	Chemical and allied products	except 283 and 285
29	ii	Petroleum refining and related industries	
311	ii	Leather tanning and finishing	
32	ii	Stone, clay, glass and concrete products	except 323
33		Primary metal industries	
3441	ii	Fabricated structural metal	
373	ii	Ship and boat building and repairing	
10-14	iii	Mineral industry	
-	iv	Industries with permitted hazardous waste TSD facilities	
-	v	Landfills, land applications sites, and open dumps	
-	vi	Facilities recycling materials: scrapyards, battery reclaimers, salvage yards, auto junk yards, including SIC codes 5015 and 5093	
-	vii	Steam electric power generating facilities including coal handling sites	
40	viii*	Railroad transportation	
41	viii*	Local and suburban transit and interurban highway and passenger transportation	
42	viii*	Motor freight transportation and warehousing	except 4221-4225
43	viii*	U. S. Postal Service	
44	viii*	Water transportation	
45	viii*	Transportation by air	
5171	viii*	Petroleum bulk stations and terminals	
--	ix	Domestic sewage treatment works with design flow of 1.0 mgd or more	
-	x	Construction activity disturbing 5 or more acres or 1 acre or more as of March 10, 2003 (construction activities will always require NPDES permit coverage)	
20	xi	Food and kindred products	
21	xi	Tobacco products	
22	xi	Textile mill products	
23	xi	Apparel and other products made from fabric	
2434	xi	Wood kitchen cabinets	
25	xi	Furniture and fixtures	
265	xi	Paperboard containers and boxes	
267	xi	Converted paper and paperboard products	
27	xi	Printing, publishing and allied industries	
283	xi	Drugs	
285	xi	Paints, varnishes, lacquers, enamels and allied products	
30	xi	Rubber and miscellaneous plastics products	
31	xi	Leather and leather products	
323	xi	Glass products, made of purchased glass	
34	xi	Fabricated metal products	
35	xi	Industrial and commercial machinery and computer equipment	
36	xi	Electronics and other electrical equipment and components	
37	xi	Transportation equipment	
38	xi	Measuring, analyzing, and controlling instruments	
39	xi	Miscellaneous manufacturing industries	
4221	xi	Farm product warehousing and storage	
4222	xi	Refrigerated warehousing and storage	
4225	xi	General warehousing and storage	

Direct
Discharge

Stormwater – Operational

Pretreatment

No Discharge

Stormwater

- Some Facilities may qualify for no exposure certification (found in the Baseline Stormwater Forms Package)
- For facilities with an SIC code requiring Stormwater coverage, but the entire operation occurs under roof/protected from Stormwater the facility has the option to submit a no exposure certification.
- If the facility meets the conditions of the certification, the facility will not be required to obtain a permit
- Requires resubmittal every 5 years!

Permitting Process



- City only reviews Pretreatment Permits
- Public Notice required for NPDES, Pretreatment Permits, and New/Expanding No Discharge Permits

Permit Timelines

- NPDES – 180 Days
- Pretreatment – 180 Days
- No Discharge – 60 Days
- Construction Stormwater – 30 Days
- Baseline Stormwater – 45 Days



How Do I Find Applications?

- Navigate to MDEQ.MS.Gov
- Click “Permits” at the top
- Click “Environmental Permits Division Applications and Forms”



Permits

Environmental Permits Division

The Environmental Permits Division (EPD) implements and oversees most of the permitting programs for MDEQ. EPD also provides support to the Environmental Compliance and Enforcement Division (ECCED) in regulating the permitted facilities.

- > [More Information about the Environmental Permits Division](#)
- > [Environmental Permits Division Applications and Forms](#) ←
- > [NetDMR](#)

Who Are My Permitting Contacts?

For Process Water



Tracy Tomkins

(601)961-5622

Pollution Control

Agricultural

Environmental Permit Division

For Stormwater



Florance Bass

(601)961-5614

Pollution Control

Water Quality Certification

Environmental Permit Division