

Land Discharge Permit & Compliance Services

“We Lay the Groundwork for Success”



Overview

Food processors, agricultural processors, industrial facilities, municipalities and special districts that must dispose of treated process water or wastewater are categorized as “Dischargers”. Each is required to submit technical reports to Regional Water Quality Control Boards to verify that their methods of disposing treated water follow Best Management Practices (BMP) and do not pose a threat to nearby resources. Condor’s certified consulting team of geologists and engineers provides full support for obtaining, modifying, and maintaining site-specific discharge permits or general order discharge permit programs.

Site-Specific Permits—Waste Discharge Requirements (WDRs) and related Board orders:

- Report of Waste Discharge (ROWD): Condor collects and tabulates data and prepares technical reports to describe operations, characterizes the quality and quantity of proposed discharges, characterizes groundwater and evaluates degradation threats, describes BMPs, designs impoundments and basins, develops water balances, discharge-application plans, and Nutrient Management Plans (NMPs).
- Waste Discharge Requirements (WDRs): Condor professionals review draft tentative WDRs and provide comments for negotiations over provisions, limitations, and monitoring requirements.
- WDR Permit Provisions: Condor’s State-registered professionals prepare required plans and reports, including

Groundwater Monitoring Plans, Well Installation Work Plans, Well Installation Reports, Background Groundwater Quality Assessments, Anti-degradation Analyses, Groundwater Limitations Compliance Assessment Plans, and other special studies, plans, and reports.

- Monitoring and Reporting Program (MRP): Condor samples and reports required data.
- Enforcement Orders: Condor provides services for compliance and enforcement orders:
 - o Notice of Violation (NOV)
 - o Section 13267 Letters
 - o Cease and Desist Orders (CDOs)
 - o Clean-up and Abatement Orders (COAs)



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General Permits

Both the State and Regional Water Boards are writing General Permits with increasing frequency to expedite site-specific permitting. They are written for discharges of similar character and scale where risks are sufficiently understood. Condor evaluates when a General Permit is appropriate and advantageous for our client-dischargers:

- Notice of Intent to Comply (NOI): Condor prepares submittal data for the NOI and assists with obtaining the Letter of Applicability.
- Compliance Monitoring: Condor collects and reports data required by the General Permit.
- Notice of Termination (NOT): Condor advises on when to send a NOT letter.

Condor's Catch-22 Expertise: Condor has successfully used General Permits at specific sites to avoid policy "train wrecks" that occur in instances where State policies, while required by WDRs, conflict with one another.

Case Study 1:

Reuse of treated wastewater is encouraged by the *General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water*. At one site, the policy to encourage reuse of treated wastewater and the policy to avoid groundwater degradation conflicted. Condor submitted an anti-degradation analysis that the State and Regional Boards then supported and approved.

Composting Facilities

Case Study 2:

A site that would have to be closed due to onerous siting criteria required by Title 27 would be allowed under the new *General Permit for Discharge of Wastes at Compost Management Units*.

The State Water Resources Control Board is developing statewide general WDRs that address water quality protection at composting facilities that currently exist or may be constructed.

Agricultural materials, food materials, green materials, manure, vegetative food materials and others are covered under the permit. The permit requires BMPs and general monitoring that could be significantly less costly than a site-specific permit or responding to enforcement. Condor can help processors establish a Composting Management Unit (CMU) or permit an existing operation under this General Permit by filing a NOI and technical report to seek a Letter of Applicability from the Water Board. Condor can further assist our clients with compliance monitoring and reporting, and also with filing a Notice of Non-Applicability when the operation is discontinued.



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Dr. Kramer is a Certified Engineering Geologist, Certified Hydrogeologist, and a Professional Geologist. He has been with Condor for over 18 years and has over 25 years of experience in geological science and geochemistry.



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