

# NPDES Limits Expression

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# State and Federal Regs

- Expression of permit limits for continuous discharges. These requirements shall apply unless the director determines that expressing limits in these terms is impracticable.



# Non-Continuous Discharges

- Frequency of discharge
- Total mass of discharge
- Max rate of discharge
- Mass, concentration, other measures



# OAC 3745-33-05(C)(1)

- Continuous Discharges
  - Daily/Monthly for Non-POTWs
  - Weekly/Monthly for sanitary - conventional / nutrients only



# Other State WQBEL Reqs

- Mass and concentration required
- Mass/concentration calculated using WLA discharge flow, except .....
  - Wet weather flows, or
  - Water conservation / flow reduction



# Source of Flexibility

- “Impracticable” definition
- Other period needed to meet WQS



# Example – Upper LMR

- Plant performance limit
  - 1.0 mg/l weekly, 1.5 mg/l monthly
- TMDL load
  - 6.8 kg/day summer season avg
  - Met through treatment or trading

