



**National Pollutant Discharge Elimination System
(NPDES)
Permit Program**

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Table of Contents

Section I	:	Introduction
Section II	:	Assessment
Section III	:	Applicability
Section IV	:	Compliance
Section V	:	Regulatory References
Section VI	:	Supporting Documents

**National Pollutant Discharge Elimination System
(NPDES)
Permit Program**

I. Introduction

The Clean Water Act is the principle law regarding pollution control and the quality of the nation's waters. The act is one of the most highly regarded environmental statutes in existence and has brought about a significant improvement in the quality of the nation's waters.

Section 402 of the Clean Water Act authorizes the U.S. Environmental Protection Agency (EPA) or approved states to issue permits for the discharge of any pollutant from any point source into navigable waters. This section established the National Pollutant Discharge Elimination System (NPDES) permit program. The program is the primary means used to keep harmful pollutants out of navigable waters and to achieve state water quality standards. The permit identifies all wastewater discharges (by location, flow rate, and character and volume of pollutants), effluent limits, monitoring requirements, administrative procedures, and any special provisions.

**National Pollutant Discharge Elimination System
(NPDES)
Permit Program**

II. Assessment

Drexel University was founded in 1891 as the Drexel Institute of Art, Science and Industry. The Drexel Institute of Technology gained university status in 1970, becoming Drexel University. On July 1, 2002 Drexel entered a new era as Philadelphia's technological leader in health sciences education, when the University was officially united with the former MCP Hahnemann University.

Drexel University currently has three campuses in the City of Philadelphia: University City Campus (3141 Chestnut Street), Center City Campus (245 N. 15th Street), and East Falls Campus (2900 Queen Lane). Throughout the City of Philadelphia Drexel University presently owns approximately sixty-seven buildings. All the buildings on each campus discharge non-pollutant wastewater indirectly to the Public Owned Treatment Works (POTW). Storm water on each campus is discharged to the municipal separate storm sewer system of the City of Philadelphia.

Drexel's primary function is to provide academic courses and granting degrees at baccalaureate or graduate levels. The North American Industry Classification System code for Drexel University is 611310.

**National Pollutant Discharge Elimination System
(NPDES)
Permit Program**

III. Applicability

According to 40 CFR 122.1(b), Drexel University is required to apply for a NPDES permit if the discharge of pollution from any point source is into the waters of the United States.

In addition to the general requirements, a NPDES permit is required for the following specific point source discharges:

- Concentrated animal feeding operations;
- Concentrated aquatic animal production facilities;
- Discharge into aquaculture projects;
- Silviculture point sources; and
- Discharges of storm water

The only specific point source discharge listed above that is applicable to Drexel University is the discharge of storm water. According to 40 CFR 122.26(a) (1), a storm water NPDES permit is required for the following types of storm water discharges:

1. A storm water discharge with the respect to which a permit has been issued prior to February 4, 1987;
2. A storm water discharge associated with industrial activity (including construction activities that disturb ≥ 5 acres of land);
3. A discharge from a large municipal separate storm sewer system (large MS4);
4. A discharge from a medium municipal separate sewer system (medium MS4);
5. A discharge from a small MS4 required to be regulated pursuant to 40 CFR 122.32;
6. A storm water discharge associated with small construction activity (those that disturb ≥ 1 and < 5 acres of land);
7. A discharge for which the State agency or the EPA determine that storm water controls are needed, based on waste load allocations that are part of “total maximum daily loads” (TMDLs) that address the pollutant(s) of concern; or
8. A discharge which the state agency or the EPA determines contributes to a violation of a water quality standard or is a significant contributor of pollutants to waters of the United States.

**National Pollutant Discharge Elimination System
(NPDES)
Permit Program**

IV. Compliance

Drexel University is excluded from all requirements of the NPDES permit program for the following reasons:

1. Drexel University is an indirect discharger of pollutants to the Publicly Owned Treatment Works (POTW). Exclusion c of 40 CFR 122.3 states that the introduction of sewage, industrial wastes or other pollutants into publicly owned treatment works (POTW) by indirect discharge does not require a NPDES permit. According to 40 CFR 122.2 an indirect discharger means a non-domestic discharger introducing *'pollutants'* to *'publicly owned treatment works.'*
2. Drexel University does not have any storm water discharge permits specifically ones that were issued prior to February 4, 1987.
3. According to the North American Industry Classification System Drexel University is classified as an educational institution (611310). The University does not have storm water discharges associated with industrial activities. The term *'storm water discharge associated with industrial activity'* means the discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant.
4. Drexel University does not own or operate a small, medium or large MS4.
5. Construction activities conducted on campus are contracted to outside vendors. Drexel University does not conduct large (disturb ≥ 5 acres of land) or small (disturb ≥ 1 and < 5 acres of land) construction activities.
6. Drexel University has not received any determinations from the EPA concerning storm water discharges.

**National Pollutant Discharge Elimination System
(NPDES)
Permit Program**

V. Regulatory Reference – 40 CFR Part 122

**National Pollutant Discharge Elimination System
(NPDES)
Permit Program**

VI. Supporting Documents