

## Frequently Asked Questions of the 208 Water Quality Certification Process for Sewer Service

- [What is the Berkeley-Charleston-Dorchester Council of Governments \(BCDCOG\)?](#)

The BCD Council of Governments (COG) is a cooperative organization of local governments in Berkeley, Charleston and Dorchester Counties. Over the years, the COG has developed into a multifaceted service organization meeting the needs of local governments within the region. The COG assists the three counties and their 27 municipalities in a variety of ways on behalf of its member governments. The COG pursues state and federal funding for projects and programs in the areas of economic development, community development, transportation and general planning. The COG also assists local governments in improving their services in areas such as planning, financial management, public works and general public administration.

- [What does the BCDCOG have to do with water quality?](#)

The BCDCOG is the designated Water Quality Management Agency for the region. As part of our responsibilities in ensuring that the goals of the Federal Clean Water Act are carried out, the BCDCOG reviews sewer projects for conformance to the Regional Water Quality Management Plan. The BCDCOG carries out this review for SC Department of Health and Environmental Control (DHEC). Without certification from our agency, SCDHEC will not issue a permit for a sewer project.

- [What projects require a 208 Water Quality Certification?](#)

The BCDCOG reviews projects that involve point source discharges into the region's waters. Extension of sewer lines falls within that scope, as well as new point source discharges, expansions, or changes to existing discharges. The BCDCOG also reviews subdivision of property that will be served by septic systems, with the exception of simple division of land (The simple division of a tract of land, ie. cutting one lot from an existing tract that has not been previously divided, will not be processed as a subdivision. Any subsequent division of that tract will require evaluation under the SC DHEC subdivision regulation. In applying this procedure, the effective date of the current subdivision regulation will be used.) The BCDCOG does not review water line extensions or projects that fall under one of SCDHEC's general permits.

- [What information is needed with the submission of a certification form?](#)

For sewer line extensions: The BCDCOG requires a completed certification form, downloadable from this site, and a location map indicating the where the lines are to be constructed. A full set of engineering plans is **not** required. For all other projects: The BCDCOG requires a PER (preliminary engineering report) for new, expanded, or changes in point source discharges.

- [What is a POTW?](#)

POTW stands for Public Operator of Treatment Works. If the project involves sewer lines, the POTW contact on the form would be the contact to the public entity that is accepting your waste flow.

- [What fee do I have to pay?](#)

The fee is required to offset the growing costs of maintaining the Regional Water Quality Management Program. The charges vary depending on the type of request.

- **Collection Systems** (including interceptors and pump stations):..... \$230
- **Residential Multiphase Projects**
  - Phase 1 only: ..... \$230
  - All subsequent phases:..... \$175
- **Treatment Systems** (including additions, modifications, and permit reissuances):..... \$425
- **Other System Improvements** (requests that do not fall into the other categories):..... \$325

- [About how long does the review take?](#)

If a plan amendment is not required, the review should not take longer than 5 working days. It often takes less time.

- [If I have a question, who can I contact?](#)

Ron Mitchum - Executive Director  
Berkeley-Charleston-Dorchester Council of Governments  
1362 McMillan Ave., Suite 100  
North Charleston, SC 29405  
(843) 529-0400  
[ronm@bcdcog.com](mailto:ronm@bcdcog.com)

--or--

Tara Frederick - Office Manager  
Berkeley-Charleston-Dorchester Council of Governments  
1362 McMillan Ave., Suite 100  
North Charleston, SC 29405  
(843) 529-0400  
[taraf@bcdcog.com](mailto:taraf@bcdcog.com)

- [What is a Plan Amendment?](#)

Some activities, such as new point source discharges, require plan amendments prior to receiving a 208 Water Quality Certification. There are two types of amendments: minor and major.

Process for a **Minor** Plan Amendment:

1. Applicant submission of certification request and required supporting information (PER)
2. Two Week Public Notice
3. If significant public comments are received, COG may proceed with application as a Major Amendment
4. Environmental Committee Recommendation
5. Executive Committee approves amendment OR forwards recommendation to Full COG Board
6. Full COG Board -- Amendment approved or disapproved

Process for a **Major** Plan Amendment:

1. Applicant submission of certification request and required supporting information (PER)
2. Two week public notice
3. Public Hearing
4. Technical Advisory Committee Recommendation
5. Environmental Committee Recommendation
6. Vote by Full COG Board -- Amendment approved or disapproved

- [When is a Minor Plan Amendment Required?](#)

Minor Amendments are required when:

- A new wastewater treatment facility requesting a permitted flow of less than 1.0 million gallons per day and defined to be a minor facility by EPA or DHEC;
- Improvements to an existing Wastewater Treatment Plant which are necessary to meet NPDES Permit Conditions requiring increased levels of treatment;
- An existing Wastewater Treatment Facility which would be expanded by less than 50% of the current permitted capacity, with respect to flow;
- An existing Wastewater Treatment Facility which would be "rerated" to handle a higher permitted flow, but would not result in an increased permitted UOD loading to the receiving stream;
- A proposed change in the current effluent disposal method, discharge point, or service area for an existing Wastewater Treatment Plant that would be consistent with the goals and other provisions of the BCDCOG 208 Plan. Agreements between Designated Management Agencies involving these same considerations would also be considered as Minor Amendments.

- [When is a Major Plan Amendment Required?](#)

Major Amendments are required when:

1. Proposals for new, increased, or any other changes to existing permitted discharges into Water Quality Limited stream segments;
2. Proposals involving the allocation of Total Maximum Daily Loadings for Water Quality Limited stream segments;
3. Any new Wastewater Treatment Facility requesting a permitted flow of 1.0 million gallons per day, or more, or defined to be a major facility by EPA or DHEC;
4. Existing Wastewater Treatment Facilities which will be expanded by at least 50% of the current permitted capacity, with respect to flow;
5. An expansion of an existing Wastewater Treatment Facility which involves an increase in the presently permitted wasteload, expressed as Ultimate Oxygen Demand (UOD), which could be discharged to a receiving stream;
6. Proposals effecting the Service Areas of two or more Designated Management Agencies which do not include appropriate agreements between those Management Agencies;
7. Proposed projects which conflict with the goals of the BCDCOG 208 Water Quality Management Plan, or established 208 policy, such as:
  - a. Goals/Objectives to improve or maintain the quality of surface and ground waters in the Region;
  - b. The consolidation of wastewater treatment facilities into larger regional systems owned and operated by Designated 208 Management Agencies; and,

- c. To encourage that central sewer be used wherever possible, to provide an acceptable method of wastewater treatment and effluent disposal for projected residential, commercial, or industrial growth.

- [What information is required when submitting a PER to the BCDCOG for consideration?](#)

Generally the following information is required for all plan amendments to the Regional Water Quality Management Plan. From time to time, a request is submitted that requires information that is not contained in the list, or items in the list are not relevant to the proposed project. Prior to submission of the PER, it is recommended that the applicant contact the BCDCOG to verify what items will be required.

Plan amendments may be accomplished with an approved preliminary engineering report, provided that the appropriate issues are addressed. The report content will be the same for industrial and public wastewater treatment facilities except that industrial facilities need not address those issues pertaining to the COG's 20-year planning goals. For public wastewater treatment facilities and industrial facilities, with the preceding exception, the following issues must be addressed in the report:

1. Justification for the plan amendment, such as;
  - a. The construction of a new wastewater facility;
  - b. A change in the service area, method of treated effluent disposal, treated effluent discharge point, or increase in design capacity of an existing wastewater treatment facility (WWTF) to meet revised 20-year needs; and,
  - c. The execution of an interlocal agreement between two or more local governments, special purpose districts, or other sewer providers regarding sewer service areas
2. The identification of the designated 20-year planning area.
3. Projected land use patterns over the 20-year planning period for the designated wastewater facilities planning area.
4. Population projections for the designated planning area over a 20-year period, and associated wastewater flow.
5. An evaluation of feasible wastewater collection, treatment and/or effluent disposal alternatives which would be required to handle the projected wastewater flow to meet 20-year needs for the planning area.
6. An environmental assessment and cost effective analysis of the most feasible wastewater collection, treatment, and/or effluent disposal alternatives.
7. The identification of the selected wastewater collection, treatment, and/or effluent disposal alternatives identified in the above analysis.
8. If the above analysis determines that the existing WWTF must be expanded, or that a new facility must be constructed to handle the projected 20-year design flow, the following items must be included in the PER/Facilities Plan Update:
  - a. Process design criteria, and typical process flow schematic for the selected treatment alternative.
  - b. Expected effluent quality; wasteload allocation and proposed NPDES permit limits, issued by the South Carolina Department of Health and Environmental Control (SCDHEC), for the selected treatment alternative.
  - c. For phased WWTF upgrades (or construction), the phase schedule, design flow, process design, expected effluent quality, and method of treated effluent disposal for each phase.
9. The method of sludge disposal associated with the selected treatment alternative must be identified; off site disposal shall require the approval of the disposal site operator, (responsible local government and/or applicable sewer district).

- [What are the procedures for Major and Minor Amendments?](#)

**Major Amendments** would require a Public Meeting, advertised by a two-week notice in a newspaper distributed in the area affected by the proposed amendment, to receive public comments. The hearing record would remain open for ten working days following the Meeting to receive written comments on the proposed amendment. A responsiveness summary would then be prepared to address all comments received on the proposed amendment. The BCDCOG Environmental Committee will then be asked to review the proposal and make a recommendation to the BCDCOG regarding its adoption as an amendment to the 208 Plan.

The Council of Governments and the applicant for the Plan Amendment must agree to a time, date and place for the public meeting required to obtain public comments on the proposed amendment. The applicant is responsible for placing advertisements in local newspapers, arranging for the physical accommodations for the meeting, and, for developing a record of the proceedings of the meeting. An Affidavit of Publication from the newspaper, and a responsiveness summary to the comments received at the Public Meeting, need to be provided to the Council of Governments before the requested amendment can be acted upon by the COG.

Public Meetings would not be mandatory for proposed **Minor Amendments**. Instead, a public notice would be sent to interested parties and advertised in a local newspaper, to receive comments on the proposed amendment. If no significant comments are received within two weeks of the date of the notice, the proposed amendment will be presented to the BCDCOG Environment Committee for consideration of approval. If significant comments are received the COG could elect to treat the Proposal as a Major Amendment.