NPDES PERMITTING AND COMPLIANCE INSPECTIONS

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I. NPDES Basics (Chapter 3)

A. Who Needs An NPDES Permit? (3.1.3.)

1. Facilities or municipalities with a discharge of wastewater to surface waters
2. Facilities that discharges storm water from regulated facilities
3. Concentrated animal feeding operations

B. What Types Of NPDES Permits Are Available? (3.2.3.)

1. Individual permits (3.2.3.a)
2. Permit-By-Rule (3.2.3.b)
3. General Permits (3.2.3.c)

C. What Are Some Key Elements Of An NDPES Permit?

1. An authorization statement
2. Effluent limitations and monitoring requirements
3. Additional Studies and Specific Programs
4. Definitions and Monitoring Procedures
5. Reporting Requirements and Management Responsibilities
6. Activities not authorized

II. The Inspection Process

A. Why Is It Important To Know These Things?

These are the elements that we will evaluate when we conduct an inspection

B. Why Do We Conduct Inspections?

1. NPDES is a self-monitoring program
2. EPA commitments
3. DEQ Vision and Values
4. Complaints

C. Do You Feel Like A Target?

1. These commitments ensure that our inspections schedules are unbiased
2. All NPDES permitted facilities can expect regular inspections (announced and unannounced)
3. More complex facilities and/or those not in compliance with their discharge permit may be inspected more frequently
4. Not all inspections are equal. Some may include sampling and be very detailed, others will be short and sweet

D. How Do We Decide What Facilities To Inspect?

1. The date of the last inspection and the type of inspection
2. The type of facility, complexity of the treatment system and the nature of the wastewater discharge
3. When the permit will be reissued
4. The compliance status of the facility
5. Random selection

E. What Types Of Inspection Might We Conduct?

1. A Compliance Sampling Inspection
2. A Compliance Evaluation Inspection
3. Reconnaissance (recon) Inspection

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F. What Do We Look At When Preparing For A Specific Inspection?

1. A review of the file to evaluate the overall compliance status
   a. Compliance with effluent limitations
   b. Has the facility reported and submitted information as required by the permit
   c. Is the facility using the appropriate test methods?
   d. Who is the certified operator?
   e. Has the facility reported any spills?
   f. Did the facility notify us of noncompliance as required?
2. Trends in operational problems?
3. Is the facility proactive or reactive with issues regarding operation and maintenance problems?

G. So What Happens When We Get To The Facility?

1. An opening conference with the operators/managers of the facility to discuss the purpose of the inspection
2. A review of the facility's records
3. Follow the water flow from where it enters facility to where it exits facility
4. A review of other areas such as sampling techniques or an inspection of the laboratory
5. A tour of facility and the waste treatment facilities. We will be evaluating:
   a. Evidence of spills or other unauthorized discharges
   b. Operation and maintenance problems
   c. Storm water issues
   d. Overall housekeeping of the facility
   e. The visual quality of the wastewater being discharged
6. A closing conference. This conference will summarize:
   a. Those areas of noncompliance that were identified
   b. Those areas that need improvement
   c. What additional information we may need
   d. What information we will be providing to the facility
   e. What our next steps are likely to be (letter, follow-up inspection)

III. How You Can Improve The Results Of Your Inspection

A. What Are Some Common Violations That We Identify During An Inspection?

1. Narrative standard violations (foam, turbidity, color)
2. The facility has failed to report their noncompliance as required
3. The facility is not monitoring at the specified level
4. Improper test methods and quantification levels
5. Transcription problems with reported data
6. Improper calculations (e.g. averages, geometric mean)
7. The facility did not have a properly certified operator
8. The facility failed to send us something that was required or it was not sent timely
9. The facility is not collecting or retaining all the required monitoring data
10. Storm water issues (e.g. track-out, secondary containment, exposure)
11. General housekeeping
12. Unauthorized discharges

B. So How Can You Stay In Compliance With Your Permit?

1. Read and understand your permit and write down important dates
2. Check your forms to ensure you are collecting all the required information
3. Double check your monitoring data for accuracy before you submit it to us
4. Educate your employees so they don't unknowingly create a problem
5. If you aren't sure we need to be called for a problem, call anyway
6. Get to know your compliance person so you can work together when problems arise

C. We Have The Same Goals – Maintaining compliance and protect public health and the environment.