



NPDES Permitting and Compliance Inspections

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NPDES Basics (Chapter 3)

- **Who Needs An NPDES Permit? (3.1.3.)**
 - Facilities or municipalities with a discharge of wastewater to surface waters
 - Facilities that discharge storm water from regulated facilities
 - Concentrated animal feeding operations
- **What Types Of NPDES Permits Are Available? (3.2.3.)**
 - [Individual permits](#) (3.2.3.a)
 - [Permit-By-Rule](#) (3.2.3.b)
 - [General Permits](#) (3.2.3.c)
- **What Are Some Key Elements Of An NPDES Permit?**
 - An authorization statement
 - Effluent limitations and monitoring requirements
 - Additional Studies and Specific Programs
 - Definitions and Monitoring Procedures
 - Reporting Requirements and Management Responsibilities
 - Activities not authorized

The Inspection Process

- **Why Is It Important To Know These Things?** These are elements that we will evaluate when we conduct an inspection
- **Why Do We Conduct Inspections?**
 - NPDES is a self-monitoring program
 - U.S. EPA commitments
 - [DEQ Mission](#)
 - Complaints
- **Do You Feel Like A Target?**
 - These commitments ensure that our inspections schedules are unbiased
 - All NPDES permitted facilities can expect regular inspections (announced and unannounced)
 - More complex facilities and/or those not in compliance with their discharge permit may be inspected more frequently
 - Not all inspections will include the same level of review
- **How Do We Decide What Facilities To Inspect?**
 - The date of the last inspection and the type of inspection
 - The type of facility, complexity of the treatment system and the nature of the wastewater discharge
 - When the permit will be reissued
 - The compliance status of the facility
 - Random selection
- **What Types Of Inspection Might We Conduct?**
 - A Compliance Sampling Inspection
 - A Compliance Evaluation Inspection
 - Reconnaissance (recon) Inspection

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

- A review of the file to evaluate the overall compliance status
 - Compliance with effluent limitations
 - Has the facility reported and submitted information as required by the permit
 - Is the facility using the appropriate [test methods](#)?
 - Who is the [certified operator](#)?

- Has the facility reported any spills?
 - Did the facility notify us of noncompliance as required?
 - Trends in operational problems?
 - Is the facility proactive or reactive with issues regarding operation and maintenance problems?
- **So What Happens When We Get To The Facility?**
 - An opening conference with the operators/managers of the facility to discuss the purpose of the inspection
 - A review of the facility's records
 - Follow the water flow from where it enters facility to where it exits facility
 - A review of other areas such as sampling techniques or an inspection of the laboratory
 - A tour of facility and the waste treatment facilities. We will be evaluating:
 - Evidence of spills or other unauthorized discharges
 - Operation and maintenance problems
 - Storm water issues
 - Overall housekeeping of the facility
 - The visual quality of the wastewater being discharged
 - A closing conference. This conference will summarize:
 - Those areas of noncompliance that were identified
 - Those areas that need improvement
 - What additional information we may need
 - What information we will be providing to the facility
 - What our next steps are likely to be (letter, follow-up inspection)

How You Can Improve the Results of Your Inspection

- **What Are Some Common Violations That We Identify During An Inspection?**
 - [Narrative standard](#) violations (foam, turbidity, color)
 - The facility has failed to report their noncompliance as required
 - The facility is not monitoring at the specified level
 - Improper test methods and quantification levels
 - No laboratory quality assurance/quality control program or one that is out-of date
 - Transcription problems with reported data
 - Improper calculations (e.g. averages, geometric mean)
 - The facility did not have a properly certified operator
 - The facility failed to send us something that was required or it was not sent timely
 - The facility is not collecting or retaining all the required monitoring data
 - [Storm water](#) issues (e.g. track-out, [secondary containment](#), exposure)
 - General housekeeping
 - Unauthorized discharges
- **So How Can You Stay in Compliance With Your Permit?**
 - Read and understand your permit and write down important dates
 - Check your forms to ensure you are collecting all the required information
 - Double check your [monitoring data](#) for accuracy before you submit it to us
 - Educate your employees so they don't unknowingly create a problem
 - If you aren't sure we need to be called for a problem, call anyway
 - Get to know your [compliance person](#) so you can work together when problems arise

What's New in the NPDES Program?

- **What's New?**
 - Additional analytic [testing requirements](#) for some toxic pollutants
 - 316(b) Rule – [Cooling water intake structures](#)
 - MiWaters training presentation
 - [Compliance Assistance](#) Tools
- **We Have the Same Goals** – Maintaining compliance and protect public health and the environment.