

## National Pollutant Discharge Elimination System (NPDES) Permit Compliance Self-Checklist

This checklist is intended to help National Pollutant Discharge Elimination System (NPDES) Permit holders complete a facility-initiated compliance check. While successful completion of the checklist does not guarantee permit compliance, it is a tool that can be used to evaluate a facility's compliance with its NPDES Permit. This checklist is voluntary and may be used any time the permittee wishes to evaluate compliance or prepare for an inspection. Completed checklists should not be returned to Michigan Department of Environmental Quality (MDEQ) staff.

### Documents that must be maintained and available for review at the time of an inspection:

- NPDES Permitting documents
- Facility Classification Letter
- Retained Self-Monitoring Approval and Annual Certifications, if applicable
- Reduced Monitoring Approvals, if applicable
- Alternate Monitoring Location Approval, if applicable
- Water Treatment Additive Approvals, if applicable
- Approved Storm Water Pollution Prevention Plan (SWPPP), if applicable
- Laboratory Records and Bench Sheets (including records from contract labs)
- Laboratory Quality Assurance/Quality Control (QA/QC) Methods and Records
- Monthly Operating Reports, if applicable
- Operation and Maintenance (O&M) Manual, if applicable
- Other Permit-Required Documents, if applicable (e.g., Pollutant Minimization Program, Short-Term Waste Characterization Study, Whole Effluent Toxicity Study, Asset Management Program, etc.)

### Program components that may be inspected and documentation and/or implementation activities that MDEQ staff may review during an inspection.

#### Laboratory:

- Laboratory equipment is in proper working order (e.g., clean, calibrated, balance vibration-free, etc.)
- Reagents and other chemicals are not expired
- Equipment is maintained at appropriate temperature:
  - Sample refrigerator and composite sampler 0-6°C
  - BOD incubator 20°C ±1
  - Fecal coliform incubator 44.5°C ±0.2
  - Drying oven 103-105°C ±1
  - Muffle furnace 550°C ±50

## **WATER – NPDES PERMIT COMPLIANCE SELF-CHECKLIST**

Equipment maintenance records are available (e.g., including thermometers)

Calibration records (including thermometers and calibration curves) are available

Laboratory records include (may be dispersed on various record types):

- Exact place, date, time of measurement or sample collection
- Person(s) who performed the measurement or sample collection
- Dates analyses were performed
- Person(s) who performed the analyses
- Analytical techniques or methods used
- Date of and person responsible for equipment calibration
- Results of all required analyses

Proper reference manuals and standard operating procedures are available to laboratory personnel

Written QA/QC procedures are adequate and available to laboratory personnel

- Control charts are used for QA/QC data
- QA/QC data are within control limits
- Methods are in place for addressing cause of QA/QC data falling outside of control limits

### **Analytical Methodology:**

U.S. EPA-approved wastewater test methods with sufficient sensitivity to determine compliance with effluent limitations are being used

Alternate test methods, if used, have been approved by the U.S. Environmental Protection Agency either for general use or on an individual case-specific basis

Significant figures and rounding rules are consistent with the DEQ Policy

Contract laboratory data, chain of custody and QA/QC Program are available

### **Sampling:**

Samples are representative of the discharge

24-hour composite samples are flow proportioned

Sample collection method is consistent with the permit effluent limits (e.g. grab, composite)

Composite sampler is working properly

Sampling equipment and containers are clean

Sampling containers consist of the appropriate material (e.g., glass, plastic) for the type of sample being collected

Proper sample preservation, storage, and hold time procedures are being used

QA/QC monitoring is being conducted as specified by approved methods

Staff are trained in proper sample collection procedures

## WATER – NPDES PERMIT COMPLIANCE SELF-CHECKLIST

### Recordkeeping and Reporting:

Records are kept for a minimum of 3 years

Facility has notified DEQ of changes in operations, name change, or ownership

Facility reports any monitoring and analyses conducted in addition to permit-required monitoring

Retained self-monitoring data are available, if applicable

DMRs are submitted timely and consistent with analytical results and bench sheets

If water treatment additives are used, products and concentration information is available

Noncompliance is reported in accordance with the NPDES Permit

### Site Review (including Operation and Maintenance):

Facility has sufficient staffing to operate effectively (and consistent with the O&M Manual, if applicable).

Facility has a certified operator(s) consistent with the facility classification document

Influent and effluent wastewater characteristics are consistent with the most recent permit application

Equipment and treatment units are maintained and in working order

Equipment maintenance and calibration logs are maintained

Collection/treatment system and general facility are free of spills, overflows, excess accumulations of grease, solids, foam or floating materials

Discharged storm water does not contain polluting materials

### MiWaters:

Authorized user(s) account has been established (at minimum, there should be one administrator)

Certifier Status Approvals have been received for authorized users who submit data/reports/applications.

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