

NPDES Permitting and Compliance Inspections

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Presentation Goals and Objectives

- A discussion about the NPDES permit (*Chapter 3 of Michigan Manufacturers Guide*)
- Information about the inspection process
- Common violations found during an inspection
- How to avoid those violations
- What's New?

Why are Permits needed?

Who Need an [NPDES Permit](#)? (3.1.3.)

- Any entity that discharges wastewater to surface waters of the state
- Any entity that discharges storm water when associated with certain industrial, municipal and construction activities
- Concentrated animal feeding operations

Types of NPDES Permits (3.2.3.)

- [Individual permits](#) (3.2.3.a)
 - Facility Specific
 - Tailored to facility-specific discharges
 - Specific to the receive water they discharge to
- [Permit-By-Rule](#) (3.2.3.b)
 - Requirements stated in a formally promulgated administrative rule
 - Facility must abide by the provisions written in the rule
 - Storm water from construction sites of one acre or more are covered by a Permit-By-Rule
- [General Permits](#) (3.2.3.c)
 - Designed to authorize similar type discharges
 - Must be complemented by a Certificate of Coverage
 - Examples:
 - Storm Water
 - Wastewater Lagoons
 - Noncontact Cooling Water
 - Hydrostatic Pressure Test Water
 - Petroleum Contaminated Groundwater

Key Elements of an NPDES Permit

1. An authorization statement
2. Effluent limitations and monitoring requirements
3. Additional Studies
4. Specific Programs
5. Definitions – of terms used in the permit
6. Monitoring Procedures
7. Reporting Requirements
8. Change in Operations/Discharge
9. Noncompliance Notification
10. Management Responsibilities
11. Activities not authorized

The Inspection Process

All of the above 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
- [Types of Inspections](#)
 - Compliance Sampling Inspection
 - Compliance Evaluation Inspection
 - Reconnaissance (recon) Inspection
- How do we Prepare for an 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?
- 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)

Common Violations

- [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

New Compliance Self-Audit Checklist

What's New?

- [Compliance Assistance](#) Tools
- [New DMR Reporting Guidelines and FAQ](#)
- Exceptions

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