

# NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

## PERMIT COMPLIANCE SELF-CHECKLIST

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) has developed this checklist 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, the checklist can be used to evaluate a facility's compliance with its NPDES Permit and/or to prepare for an inspection. This checklist is voluntary and should **not** be returned EGLE 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 EGLE 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
- 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 to address cause of QA/QC data falling outside of control limits

**ANALYTICAL METHODOLOGY:**

- U.S. Environmental Protection Agency (U.S. EPA)-approved wastewater test methods with required quantification levels and/or sufficient sensitivity to determine compliance with effluent limitations are being used
- Alternate test methods, if used, have been approved by the U.S. EPA, either for general use or on an individual case-specific basis
- Significant figures and rounding rules are consistent with EGLE 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

**RECORDKEEPING AND REPORTING:**

- Records are kept for a minimum of 3 years
- Facility has notified EGLE 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

**MIENVIRO PORTAL:**

- 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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