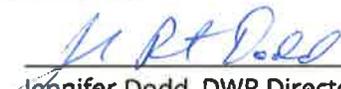


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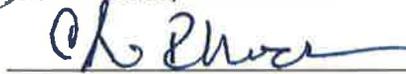
DISCLAIMER: This document is policy only and does not create legal rights or obligations. It is intended to provide Division staff guidance on how to apply decisions, procedures and practices pertaining to the internal operation or actions of the Division. Decisions affecting the public, including the regulated community, in any particular case will be made applying applicable laws and regulations to the specific facts.

1) EFFECTIVE DATE: 10-01-2019

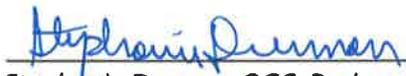
2) SIGNATURES:



Jennifer Dodd, DWR Director



Chris Rhodes, DWR Deputy Director of Field Operations, Preparer



Stephanie Durman, OGC, Reviewer

Revision Number	Date	Brief Summary of Change
0	10/01/2019	Initial issuance of the policy

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This guide covers the scope of a Compliance Evaluation Inspection (CEI). Please use the *EPA Compliance Inspection Manual 2017* as the reference manual for more detail and specifics for other types of inspections such as Compliance Sampling Inspection (CSI), Compliance Biomonitoring Inspection (CBI), and Performance Audit Inspection (PAI). The bolded numbered items (excluding headers) identify compliance priorities. Non-compliance with these bolded items should result in a notice of violation (NOV) being recommended to the applicable field office manager.

I. Permit Verification

- 1. All discharges permitted**
2. New or changed processes or discharges (permit modification may be needed)
 - a. Division notified
 - b. Plans and specifications approved before construction (if necessary)
 - c. Constructed according to approved plans and specifications
- 3. Permit current**
4. Permit renewal application received on time (if applicable)
5. Permittee/facility name
6. Permittee/facility contacts
7. Permittee/facility location/address
8. Facility type (*e.g.*, municipal, industrial, etc.)
9. Facility rating (*i.e.*, major, minor)
10. Facility is as described in permit/rationale/application
11. Correct receiving water(s)

II. Records/Reports

- 1. Supporting records consistent with submitted reports (MOR, DMR, etc.)**
 - a. Laboratory reports and bench sheets consistent with reported data**
 - b. All calculations performed correctly**
 - c. Appropriate significant digits reported
 - d. Consistent rounding procedures applied
 - e. Proper procedures for error identification and correction applied
 - f. Quality Assurance/Quality Control documented and appropriate
2. Appropriate record retention period utilized
3. Record storage secure
4. Records legible and complete
5. Records contain all required information
6. Equipment maintenance and calibration records kept
7. Facility operations log kept

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8. Facility construction plans kept
9. Facility maintenance records kept
10. Appropriate signature and certification present (where necessary)
11. Adequate data management system(s) utilized
12. Data secure

III. Facility Site Review, Self-Compliance Program, Operations & Maintenance, and Sanitary Sewer Overflows

1. Flow measurement
 - a. Primary device
 - i. Type (e.g., weir, flume, magmeter, etc.)
 - ii. Proper installation
 - iii. Free from residue, buildup, and obstruction
 - iv. Free fall of flow under all conditions (not submerged)
 - v. Adequate for expected range of flows
 - vi. Expected accuracy $\pm 10\%$ of actual flow**
 - b. Secondary device
 - i. Type (e.g., ultrasonic, pressure, etc.)
 - ii. Proper flow calculation for primary device
 - iii. Proper installation
 - iv. Free from residue, buildup, and obstruction
 - v. Protected from sunlight and other sources of temperature variation
 - vi. Adequate for expected range of flows
 - c. Flow measurement calibration
 - i. Proper frequency (at least annual)
 - ii. Periodic verification between full calibrations
 - iii. Verification of proper device/sensor position(s)
 - iv. Flow calculated correctly**
2. Facility walkthrough (inside and outside)
 - a. Facility as described in permit
 - b. Good housekeeping practices implemented
- 3. All treatment units/equipment in service and properly operated**
4. Process control testing
5. Operation and Maintenance manual/plan present and implemented
- 6. Active maintenance program** (preventive and ongoing)
7. Spare parts/equipment inventory available
8. Chemicals and materials storage
 - a. Areas designated
 - b. Proper containers utilized
 - c. Neat and orderly storage
 - d. Secondary containment utilized (if applicable)

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9. Waste disposal
 - a. Disposal location(s) designated
 - b. Closed/covered hoppers
 - c. Enclosed compactors
 - d. Surrounding area free from residue
 - e. Manifests documenting proper disposal
10. Pretreatment Industrial User permit for discharge to wastewater facility (if applicable)
11. Facility staff
 - a. **Proper operator certification level (if applicable)**
 - b. Adequate personnel
 - c. Adequate resources for personnel
12. **Process control testing**
13. **Reporting of noncompliance**
 - a. **Sanitary sewer overflows - wet weather, dry weather**
 - b. **Combined sewer overflows - wet weather, dry weather**
 - c. **Releases - wet weather, dry weather**
 - d. **Treatment bypasses**
 - e. **Washout**
14. Recent/planned changes

IV. Outfall/Effluent/Receiving Waters

1. Observation of all effluent/outfalls
 - a. Oil sheen
 - b. Grease
 - c. Turbidity
 - d. Visible foam
 - e. Visible floating solids
 - f. Color
 - g. Other (*e.g.*, odor, floating solids, suspended solids, poor accessibility, channel erosion, submerged diffuser, etc.)
2. **Observation of receiving water(s)**
 - a. **Oil sheen**
 - b. **Grease**
 - c. **Turbidity**
 - d. **Visible foam**
 - e. **Visible floating solids**
 - f. **Color**
 - g. **Other (*e.g.*, odor, floating solids, suspended solids, etc.)**
3. **Unpermitted discharges**

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V. Laboratory

1. **Approved analysis methods used**
 - a. Methods as established in 40 C.F.R. Part 136
 - b. Methods specified in facility permit for parameters not in Part 136
2. Observe sample collection
 - a. Sample type (grab, flow-proportioned composite, time-proportioned composite)
 - b. Clean/proper containers
 - c. Sample preservation
 - d. Sample holding time before analysis
 - e. Chain-of-custody procedures
 - f. Sample storage
3. Verify proper composite sampler installation
 - a. Clean/new tubing
 - b. Tubing free from solids deposits, standing water, sags, etc. and protected from sunlight
 - c. Sampler intake strainer at proper location – upstream (influent) or downstream (effluent) of in-plant return lines
 - d. Sampler intake strainer suspended at mid-channel and mid-depth
 - e. Sampler strainer free from debris
 - f. Verify individual aliquot volume ≥ 100 mL using graduated cylinder
 - g. Verify sampler programming
 - i. Flow-proportional
 - ii. Adequate aliquot volume
 - iii. Adequate number of aliquots
 - iv. Proper sample container volume
 - h. Check condition of dessicant in sampler control panel
 - i. Verify sample refrigeration maintained
4. All laboratory equipment functional
5. Calibration of laboratory equipment
 - a. Analytical balance
 - b. Balance check weights
 - c. Incubator thermometer(s)
 - d. Refrigerator thermometer(s)
 - e. Influent/effluent sampler thermometer(s)
6. Glassware
 - a. Clean
 - b. Accurate
 - c. Adequate supply
7. Reagents
 - a. Stored properly
 - b. Unexpired

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8. Onsite laboratory analyses
 - a. Standard Operating Procedure documents for each analysis
 - b. Analyst training
 - c. Laboratory documentation
 - d. Proper calculations
 - e. Quality Assurance/Quality Control procedures satisfy 40 C.F.R. § 136.7
 - f. Additional monitoring data included in reporting
 - g. Observation(s) of onsite sample analysis (Performance Audit Inspection or as warranted)
9. Contract laboratory analyses
 - a. Laboratory documentation
 - b. Proper calculations
 - c. Quality Assurance/Quality Control procedures satisfy 40 C.F.R. § 136.7
 - d. Additional monitoring data included in reporting
10. Good laboratory practices

VI. Sludge Handling/Disposal (or Biosolids Handling/Disposal) – optional

1. Biosolids/sludge disposal practices
 - a. DSWM special waste permit for landfill disposal
 - i. TCLP monitoring
 - ii. Paint filter test
 - b. State Operating Permit for land application of non-exceptional quality biosolids
 - i. All land application sites permitted
 - ii. Chemical/metals monitoring conducted at required frequency
 - iii. TCLP monitoring conducted at required frequency
 - iv. Digester type
 - v. Dewatering equipment
 - vi. Biosolids storage/stockpiles
 - vii. Transportation/application equipment
 - viii. Pathogen reduction demonstration
 - ix. Vector attraction reduction demonstration
 - x. Application site pollutant loading tracked
 - xi. Land application method
 - c. Disposal of exceptional quality biosolids
 - i. Chemical/metals monitoring at required frequency
 - ii. Disposal method – bulk, bag, other container
 - iii. Pathogen reduction demonstration
 - iv. Vector attraction reduction demonstration
 - d. Annual report submitted
2. Disposal of industrial sludge(s)

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- a. DSWM permit for disposal (if necessary)
- b. Manifests documenting proper disposal
3. See separate Audit/Inspection forms for detailed compliance inspections

VII. Collection System, Combined Sewer Overflow/Sanitary Sewer Overflow- optional

1. **Proper collection system operator certification level** (if applicable)
2. **Proper operation and maintenance**
3. Capacity Management, Operation, and Maintenance (CMOM) program
4. Sewer Overflow Response Plan (SORP)
5. Pending rehabilitation/replacement projects
 - a. Funding
 - b. Plans/specifications approval
4. CSO/SSO/release site observation
 - a. Location
 - b. Quantity
 - c. Cleanup
 - d. Corrective action(s)
5. Pump station observations
 - a. Pumps, control system, and alarms operational
 - b. Evidence of corrosion
 - c. Check valves operational
 - d. Wet well free from grease, solids, etc.
 - e. Backup power
6. Separate Inspection form in development

VIII. Pretreatment

1. Pretreatment program implemented (if necessary)
2. Required influent and effluent monitoring performed for each reporting period
3. Required influent and effluent monitoring performed once per permit cycle
4. All industrial users permitted
5. Periodic program reports submitted (*i.e.*, semi-annual reports, annual reports, etc.)
6. See separate Technical Assistance Visit, Pretreatment Compliance Inspection, and Pretreatment Audit Inspection forms for detailed compliance inspections

IX. Wastewater, Pollution Prevention, Housekeeping, and Stormwater

1. Best Management Practices (BMP) plan
 - a. **BMP plan developed and implemented**
 - b. BMP plan current and effective
 - c. Observe condition of BMP areas

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- d. Observe best management practices/pollution prevention controls
 - i. Housekeeping
 - ii. Material storage
 - iii. Containment measures
 - iv. Oil/water separators
 - v. Other
- e. Facility security
- f. Employee training/records
- g. Area inspection records
- h. Preventive maintenance program
- i. Material compatibility assessment
- j. Spill Prevention Control and Countermeasure incorporation into BMP plan
 - i. Plan current
 - ii. Area inspections
- k. Industry specific BMP plans (*e.g.*, spent pulping liquor BMP)
- l. All required areas addressed
- 2. Stormwater Pollution Prevention Plan (SWPPP) (if applicable)
 - a. SWPPP plan developed and implemented**
 - b. Plan current and effective
 - c. Observe best management practices/pollution prevention controls
 - i. Housekeeping
 - ii. Material storage
 - iii. Containment measures
 - iv. Oil/water separators
 - v. Retention/detention ponds
 - vi. Sediment traps
 - vii. Inlet/outlet protection
 - viii. Other
 - d. Employee training/records
 - e. Area inspection records**
 - f. SPCC incorporation into SWPPP
 - i. Plan current
 - ii. Area inspections
 - g. All required areas addressed
 - h. See separate construction stormwater inspection form for detailed compliance inspections

X. Stormwater CSW, TMSP, MS4

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1. See separate Inspection form for detailed Construction Stormwater compliance inspections
2. See separate Inspection form for detailed Industrial Stormwater compliance inspections
3. See separate MS4 Audit/Inspection worksheets for detailed compliance inspections

XI. Other NPDES GPs (HST, UST, RMCP, WTP, TNP and TNHA)

1. In the absence of a GP-specific form or checklist, refer to the steps in this guide and the general permit for inspection guidance.