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: 08-19-2019

2) SIGNATURES:

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Jennifer Dodd, DWR Director

_____________________________________
Chris Rhodes, DWR Deputy Director of Field Operations, Preparer

______________________________________
Stephanie Durman, OGC, Reviewer

Compliance monitoring pursuant to the Clean Water Act (CWA) Section 106 inspection work plan is a cornerstone of the Division of Water Resources' National Pollutant Discharge Elimination System (NPDES) program to achieve clean water. The primary goal of the Division's compliance monitoring efforts is to ensure and document that entities regulated under the NPDES and pretreatment programs are complying with their CWA obligations. The Division's compliance monitoring program should accurately identify and document noncompliance, support the enforcement process, monitor compliance with enforcement orders and decrees, deter noncompliance, support the permitting process, and further the broad watershed protection and restoration goals of the NPDES program.

The annual Section 106 Work Plan is prepared to comply with EPA’s Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy (July 21, 2014).1

The Tennessee NPDES inspection program focuses on achieving compliance, accurate identification and documentation of noncompliance, and providing technical oversight of regulated facilities. This policy describes the frequency and the type of compliance monitoring inspections that are appropriate for various categories of NPDES-regulated facilities to ensure the best utilization of Division staff time and resources.

1 Italicized text in this policy document is excerpted from this EPA document.
Tennessee uses the EPA Compliance Inspection Manual (EPA Publication Number: 305-K-17-001 Interim Revised Version, January 2017, available at [https://www.epa.gov/compliance/compliance-inspection-manual-national-pollutant-discharge-elimination-system](https://www.epa.gov/compliance/compliance-inspection-manual-national-pollutant-discharge-elimination-system)) as the authoritative reference for all NPDES inspections. The EPA Compliance Inspection Manual provides guidance applicable to each type of inspection an inspector may be required to conduct at an NPDES permitted facility or at an unpermitted facility with discharges. Specifically, the manual provides information and references on the components necessary to complete the various types of NPDES inspections. Many of the chapters also include checklists. An inspector should not rely solely on these checklists, but use them as one of the available tools when conducting an inspection and evaluating compliance. In addition, the Tennessee Inspection Guide (Appendix A, hereto) is provided for the inspectors to guide their inspection process and provide consistency in the scope of NPDES inspections.

**Major NPDES Permittees (excluding MS4s)**

The category of “major” NPDES dischargers includes Publicly Owned Treatment Works (POTWs) with design flows of greater than one million gallons per day and active industrial or mining facilities scoring more than 80 for the six factors on the “NPDES Permit Rating Work Sheet” (available at [http://www.epa.gov/npdes/pubs/owm0116.pdf](http://www.epa.gov/npdes/pubs/owm0116.pdf)). There are a total of 162 major facilities in Tennessee.

The minimum frequency is at least one comprehensive inspection every two years. Inspections of major POTWs may be conducted in conjunction with inspections of the Sanitary Sewer Systems (SSSs) and their satellites and Combined Sewer Systems (CSSs) that are connected to the POTW.

The following inspection types meet the definition of a comprehensive inspection:

- Compliance Biomonitoring Inspection (CBI);
- Compliance Sampling Inspection (CSI);
- Performance Audit Inspection (PAI); and
- Compliance Evaluation Inspection (CEI).

The goal of the Division is to inspect at least half of major NPDES permittees annually, so that each facility is inspected once every two years.

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2 Phase I municipal separate storm sewer systems (“MS4s”) are also classified as “major” discharges, but are addressed separately below.

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CBIs are used when the permit requires Whole Effluent Toxicity (WET) testing. For coordination and budgeting reasons, CBIs are identified in advance for specific dates provided by the Enforcement and Compliance Unit and scheduled with the Tennessee Department of Health laboratory. The target frequency is to conduct CBIs on 5% of systems with a WET testing requirement.

Compliance Sampling Inspections (CSIs) shall be conducted at least once every ten years, or more often as warranted, for each facility that conducts sampling and in-house chemical analysis of effluent. Performance Audit Inspections (PAIs) may be conducted as a precursor to CSIs to best target sampling activities and available resources.

Compliance Evaluation Inspections (CEIs) are conducted when CBIs, CSIs, and PAIs are not required.

**Minor NPDES Permittees**

This category includes discharges from POTW facilities with design flows of less than one million gallons per day, POTWs serving populations of less than 10,000 persons, and active non-major industrial or mining facilities (i.e., facilities scoring less than 80 for the six factors on the NPDES Permit Rating Work Sheet, available at http://www.epa.gov/npdes/pubs/owm0116.pdf). This category includes individually permitted facilities, as well as facilities that are covered by the following general permits: Hydrostatic Testing, Ready Mix Concrete Plants, Inter-basin Water Transfer, Underground Storage Tank Remediation, and Water Plant Backwash. There are 920 Individual NPDES permittees (479 WWTP and 443 mining) and 504 General NPDES permittees in this category.

For traditional non-major permittees that are not contributing to CWA Section 303(d) listed impairments the minimum inspection frequency goal is to inspect each traditional non-major facility that is not contributing to section 303(d) impairments at least once every five years. Traditional non-major facilities that are permitted to discharge pollutants of concern corresponding to the 303(d) listing parameter should be inspected at least once every five years with a comprehensive inspection.

The Division will conduct a comprehensive inspection (CBI, CSI, PAI, and CEI) of each minor facility in this category at least once every five years.

As with major facilities, CBIs are used only when the permit calls for WET testing. CSIs shall be conducted at minimum once every ten years, or more often as warranted, for each facility that conducts sampling and in-house chemical analysis of effluent. PAIs may be conducted...
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as a precursor to CSIs to best target sampling activities and available resources. CEIs are conducted when CBIs, CSIs, and PAIs are not required.

The non-major NPDES mining permits are prioritized based on the following: time since the last inspection, status of receiving stream (mining-related impacts or sedimentation/siltation impairment), recent issues/complaints to the Division warranting more frequent inspection, and watershed cycles.

In addition, the Division may conduct Reconnaissance Inspections (RI), which are much briefer in scope, as follow-up inspections for minors that do not discharge pollutants of concern to 303(d)-listed streams. Because RIs are not comprehensive inspections, they are not included in the Section106 commitments as planned inspections.

**Sewage Collection Systems**

This category includes three combined sewer systems and approximately 247 separate sewer systems covered under an NPDES permit for wastewater facilities and State Operating Permit (SOP) for non-discharging collection systems.

The minimum inspection frequency goal is for all major and non-major Combined Sewer Systems (CSSs) to receive at least one comprehensive inspection every five years. These inspections may be conducted in conjunction with compliance inspections at major and non-major POTWs. More frequent inspections, including CSO inspections, may be necessary for some systems in order to promptly evaluate known or suspected recurring overflows.

The minimum inspection coverage goal for Separate Sewer Systems (SSSs) is for regions and states to conduct comprehensive inspections of at least 5% of SSSs each year. The universe subject to this coverage goal is the number of POTW permits in the state that include one or more sanitary sewer collection systems. Where a permit covers satellite collection systems, in order to allow the inspector to evaluate overall collection system compliance, the SSS inspection should include review of satellite systems that together comprise a substantial percentage of the total flow to the treatment plant. Inspection priority should be given to SSSs with chronic overflows and/or pump stations. More frequent inspections, including SSO inspections, may be necessary for some systems in order to promptly evaluate known or suspected recurring overflows. An inspector conducts an SSO inspection in response to information received regarding a known or suspected overflow event. In many cases, SSO inspections will be scheduled based on information about overflow occurrences received directly by EPA, or from other governmental organizations, citizens groups, or non-governmental organizations. SSO inspections, as well as broader inspections of SSSs and their satellites, may be conducted in conjunction with compliance inspections.
Tennessee has only three Combined Sewer Systems (Clarksville, Chattanooga, and Nashville) which will be inspected annually. The Division's Engineering Services Unit will assist with these inspections upon request from the Field Office.

The Division's goal is to conduct 14 SSS inspections annually, or a minimum of two per Field Office. This target will assure the five percent per year 106 commitment is met. A Separate Sewer System inspection checklist is currently under development.

**State Operating Permits with authorized groundwater discharges**
This category includes 330 SOP facilities with discharges to groundwater.

This category includes land application facilities with treated discharges to groundwater permitted through the Division's underground injection control program. These are not NPDES-permitted facilities, so the EPA does not have an inspection strategy requirement for these facilities. However, to be consistent with other wastewater programs that have treatment for discharge, Tennessee will conduct a comprehensive inspection of each permitted SOP facility in this category at least once every five years.

**Biosolids/Sludge**
This category includes 82 permits.

Because Tennessee does not have Biosolids authorization, EPA Region 4 conducts this compliance monitoring activity. Program Audits are conducted by Central Office staff on an as-needed basis. Site approvals are conducted at the Field Office with assistance from the Central Office if needed.

**Pretreatment**
This category includes 101 active pretreatment programs, five in development, and 18 dormant.

Pretreatment approval authorities should conduct at least one audit every five years of each POTW with an approved pretreatment program, generally corresponding to an annual audit rate of 20% of active approved programs.

Pretreatment approval authorities should conduct at least two Pretreatment Compliance Inspections of each POTW with an active approved pretreatment program every five years.

Pretreatment Audits are conducted for each active, approved program once every five years. A total of approximately 20 audits per year statewide are planned and committed to in the Section 106 Work Plan. Central Office staff lead the audits, with assistance from Field Office
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staff. The scope of the audit for Section 106 credit includes: interview POTW pretreatment staff to review and evaluate program modifications, legal authority, industrial user characterization, permitting, application of pretreatment standards, compliance monitoring, enforcement, data management, available resources, file review of a representative amount of significant industrial users, and oversight inspections of a representative amount of significant industrial users.

Pretreatment Compliance Inspections (PCIs) and Pretreatment Technical Assistance Visits (TAVs) are conducted on a rotating basis each year between audits so that 2 PCIs and 2 TAVs are conducted for each active, approved program once every five years. A total of approximately 40 PCIs and 40 TAVs per year statewide are planned and committed to in the Section 106 Work Plan. Field Office staff lead PCIs and TAVs. The scope of the PCI for a Section 106 credit includes: interview portion to determine compliance with pretreatment regulations, file review of a representative amount of significant industrial users, and oversight inspections of a representative amount of significant industrial users. The scope of a TAV for Section 106 credit includes: open discussion of program and follow-up of deficiencies noted in previous inspections and abbreviated file review of at least one industry. An inspector may also choose to conduct oversight inspections as part of a TAV. Additional inspections can be added if compliance issues are identified or at the request of the Control Authority.

MS4s
This category includes two large and two medium Phase 1 permittees, no Phase 1 co-permittees, one non-traditional Phase 2 permittee, 87 Phase 2 MS4s, and two Phase 2 co-permittees.

The minimum compliance monitoring goal for MS4s is for states to determine compliance of each MS4 permittee and co-permittee at least once every five years by conducting one or more of the following compliance monitoring activities: on-site audit or MS4 inspection. As part of this goal, each MS4 permittee and co-permittee should receive an on-site audit or inspection at least once every seven years.

Onsite MS4 Audits are conducted once every five years. A total of 18 audits per year statewide are planned and committed to in the Section 106 Work Plan. Statewide staff lead the audits. The scope of the audit for Section 106 credit includes: all minimum control measures, SWMP, ordinance, and monitoring program review.

MS4 inspections are conducted once between the audits. While a total of 19 CEI inspections are expected per year statewide, they are not included in the Section 106 commitments. Once completed, they are marked as Section 106 inspections and are counted at the time of reporting as additional Section 106 inspections. This approach provides a safety net in
always meeting the required number of audits/inspections for the MS4 workplan. Statewide staff are available to assist or lead the inspection, if needed. The scope of the CEI inspection for Section 106 credit includes: at least one Minimum Control Measure (MCM). Additional inspections can be added if significant non-compliance issues are identified. Individual Permit MS4s are inspected at least once every five years by designated statewide staff.

**Industrial Stormwater**

This universe currently includes 122 individual permits and 2,916 facilities covered by the TMSP general permit. There also are 606 active No Exposure Certifications. No Exposure facilities are included in the total universe count.

The inspection goal for industrial stormwater permittees is to inspect at least 10% of the universe each year. Priority should be given to inspecting permittees of environmental concern and those located in priority watersheds that may discharge a pollutant(s) that contributes to CWA section 303(d) listings and permittees located near high quality waters that the state has designated for higher levels of protection to prevent degradation.

The Division commits to inspecting at least ten percent of industrial stormwater facilities annually. To determine the annual number of inspections to be performed, the Division will query WaterLog at the beginning of each calendar year. Completed inspections prompted by a complaint will be marked as Section 106 inspections and be counted as such.

**Construction Stormwater**

This category currently includes nine individual Construction Permits and 9,810 General Permits. Builder coverages for individual lots are excluded from this total. Some permits are older than five years; some are even older than 20 years. There are a total of 5,232 active coverages under five years. ³

The minimum recommended inspection frequency for this metric is a joint EPA and state goal to inspect at least 10% of the regulated construction sites annually.

The Division commits to inspecting at least ten percent of construction stormwater facilities annually. This compliance monitoring metric applies to construction stormwater sites of equal to or greater than one acre of disturbed area. To determine the annual number of inspections to be performed, the Division will query WaterLog at the beginning of each calendar year. Priority should be given to sites located near 303(d) listed waters that are impaired for construction-associated pollutants (e.g., sediment) and to sites located near high quality waters that the state has designated for higher levels of protection to prevent degradation.

³Tennessee has agreed to better define an accurate universe of construction stormwater permittees and to close out permits when sites are stabilized.
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degradation. Completed inspections prompted by a complaint will be marked Section 106 and be counted as such. Inspections of unpermitted construction sites will count toward the annual construction stormwater coverage goal of 10% and need to be marked 106 and be counted as such.

**CAFOs/AFOs**
This universe includes 17 CAFOs with an individual NPDES permit.

The Division will inspect all NPDES-permitted CAFOs at least once every five years (20% per year).

**General NPDES Permit for Discharges from Application of (TNPs)**

As a result of a U.S. Sixth Circuit Court of Appeals decision in *National Cotton Council v. EPA*, as of October 31, 2011, point source discharges of biological pesticides, and chemical pesticides that leave a residue, into waters of the U.S. are required to comply with NPDES requirements. The EPA finalized a rule on June 21, 2013, to remove the exemption for pesticide discharges from the NPDES regulations. EPA and the states currently regulate pesticide discharges to waters of the United States primarily through NPDES general permits. The universe includes 15 coverages under the TNP general NPDES permit.

*There is no set compliance monitoring frequency goal for pesticide operators subject to the NPDES program. Regions and states should conduct compliance monitoring activities in response to tips and complaints and other available information relevant to compliance.*

The Division will inspect TNP dischargers as-needed in response to complaints.

**Summary of section 106 compliance inspection commitments:**

**Majors:** 155 WWTP permittees inspected with an identified comprehensive inspection every two years. Seven Mining permittees inspected every two years with and identified comprehensive inspection. (Mining will provide inspection frequency and list to managers)

**Minors:** 472 WWTP, 443 Mining individual permittees, and 503 general permittees inspected with an identified comprehensive inspection once every five years. (Mining will provide list to Managers)

**Collection Systems:** Three combined sewer systems inspected annually and 286 separate sewer systems inspected once every 20 years.
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**State Operating Permits with Discharge to Groundwater:** 330 SOPs inspected with an identified comprehensive inspection once every 5 years.

**Biosolids:** 82 permittees inspected on an as-needed basis.

**Pretreatment:** 101 permittees inspected with a Pretreatment audit once every five years and 2 pretreatment compliance inspections within every five years. (Central Office will prepare list)

**MS4s:** 95 MS4 permittees inspected with an audit once every five years and an MS4 inspection at least once between audits. (Central Office will prepare list)

**Industrial Stormwater:** 10% of the industrial stormwater facilities inspected annually.

**Construction Stormwater:** 10% of construction stormwater sites inspected annually.

**CAFOs:** 17 permittees inspected once every 5 years.

**TNPs:** 15 permittees inspected once every 10 years.
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Table of Acronyms

**AFO** – Animal Feeding Operation

**BMP** – Best Management Practice

**CAFO** – Concentrated Animal Feeding Operation

**CBI** – Compliance Biomonitoring Inspection

**CEI** – Compliance Evaluation Inspection

**CMOM** – Capacity, Management, Operation and Maintenance

**CSI** – Compliance Sampling Inspection

**CSO** – Combined Sewer Overflow

**CSS** – Combined Sewer System

**CSW** – Construction Stormwater

**CWA** – Clean Water Act ("the Act")

**DMR** – Discharge Monitoring Report

**DSWM** – Division of Solid Waste Management

**HST** – Hydrostatic Test Water

**MCM** – Minimum Control Measure

**MOR** – Monthly Operations Report

**MS4** – Municipal Separate Storm Sewer System

**NOV** – Notice of Violation

**NPDES** – National Pollutant Discharge Elimination System (permit)

**PAI** – Performance Audit Inspection

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PCI – Pretreatment Compliance Inspections

POTW – Publicly Owned Treatment Works

RI – Reconnaissance Inspection

RMCP – Ready-Mix Concrete Plant

SOP – State Operating Permit

SORP – Sewer Overflow Response Plan

SPCC – Spill Prevention Control and Countermeasures

SSO – Sanitary Sewer Overflow

SSS – Separate Sewer Systems

SWPPP – Storm Water Pollution Prevention Plan

TCLP – Toxicity Characteristic Leaching Procedure

TMSP – Tennessee Multi Sector Permit

TNHA – Tennessee General Permit for the application of aquatic herbicides (TNHAR0000)

TNP – Tennessee General Permit for the application of pesticides (TNPR0000)

UST – Underground Storage Tanks (or Division of)

WET – Whole Effluent Toxicity

WTP – Water Treatment Plant

WWTP – Wastewater Treatment Plant
APPENDIX A

Tennessee Inspector's Guide

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
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6. Equipment maintenance and calibration records kept
7. Facility operations log kept
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 ±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
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c. Neat and orderly storage
d. Secondary containment utilized (if applicable)

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

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
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a. Stored properly
b. Unexpired

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)
   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
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b. BMP plan current and effective
c. Observe condition of BMP areas
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
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X. Stormwater CSW, TMSP, MS4

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.

<table>
<thead>
<tr>
<th>Revision Number</th>
<th>Date</th>
<th>Brief Summary of Change</th>
</tr>
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<tbody>
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<td>0</td>
<td>08/19/2019</td>
<td>Initial issuance of the policy</td>
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