

## NPDES Permit Quality Review Checklist - For Non-Municipals

### Pre-Review Information

		Response	Comment
1.	NPDES Permit number of facility		
2.	Name of facility:		
3.	Permit Reviewer (Last Name)		
4.	Date of review (MM/DD/YYYY)		
5.	Is the draft permit complete ? (Y/N)		
6.	Is the fact sheet complete ? (Y/N)		
7.	Did the State provide all appropriate supporting information (e.g., permit application, supporting documentation) ? (Y/N)		
8.	Reviewer obtained PCS/DMR data for last 3 years (Y/N)		
9.	Reviewer examined previous permit, application, and fact sheet (Y/N/NA)		
10.	Reviewer examined all pertinent file information (Y/N)		
11.	Reviewer notified other Regional offices of reissuance (Y/N)		

### Facility Information

		Response	Comment
12.	Are all outfalls (including non-process and storm water) at the facility properly identified and authorized in the permit? (Y/N)		
13.	Does the record contain a description of the wastewater treatment process and discharge point? (Y/N)		
14.	Does the record describe the physical location of the facility? (Y/N)		
15.	Does the record provide a description of the receiving water body(s) to which the facility discharges? (Y/N)		

### Permit Cover Page/Administration

		Response	Comment
16.	Does the permit term exceed 5 years? (Y/N)		
17.	Does the permit contain specific authorization-to-discharge information (from where to where, by whom)? (Y/N)		
18.	Does the permit contain appropriate issuance and expiration dates and authorized signatures ? (Y/N)		

**Effluent Limits**

**General Elements**

		Response	Comment
19.	Does the fact sheet describe the basis of final limits in the permit (e.g., that a comparison of technology and water quality-based limits was performed, and the most stringent limit selected)? (Y/N)		
20.	Does the record indicate that any limits are less stringent than those in the previous NPDES permit? (Y/N)		
21.	If yes, does the record discuss whether “antibacksliding” provisions were met? (Y/N)		

**Technology-Based Effluent Limits (Effluent Guidelines and BPJ)**

		Response	Comment
22.	Is the facility subject to a national effluent limitations guideline (ELG) ? (Y/N)		
22a.	If yes, does the record adequately document the categorization process, including an evaluation of whether the facility is a new source or an existing source ? (Y/N/NA)		
22b.	If no, does the record indicate that limits were developed based on Best Professional Judgement (BPJ) for all pollutants discharged at treatable concentrations? (Y/N/NA)		
23.	For all limits developed based on BPJ, does the record indicate that the limits are consistent with the criteria established at 40 CFR 125.3(d)?		
24.	Does the record adequately document the calculations used to develop both ELG and/or BPJ technology-based effluent limits ? (Y/N)		
25.	For all limits that are based on production or flow, does the record indicate that the calculations are based on a “reasonable measure of ACTUAL production” for the facility (not design)? (Y/N/NA)		
26.	Does the permit contain “tiered” limits that reflect projected increases in production or flow? (Y/N)		
26a.	If yes, does the permit require the facility to notify the permitting authority when alternate levels of production or flow are attained? (Y/N/NA)		
27.	Are technology-based permit limits expressed in appropriate units of measure (i.e., concentration, mass, SU)? (Y/N)		
28.	Are all technology-based limits expressed in terms of both maximum daily and monthly average limits ? (Y/N)		
29.	Are any final limits less stringent than required by applicable effluent limitations guidelines or BPJ? (Y/N)		

**Water Quality-Based Effluent Limits**

		Response	Comment
30.	Does the record indicate that the receiving water is impaired (i.e., that the receiving water is listed on the State’s 303(d) list)? (Y/N)		
30a.	If yes, does the record indicate that a TMDL has been COMPLETED for the receiving water? (Y/N/NA)		
30b.	If yes, does the record indicate that any WQBELs were derived from a completed TMDL? (Y/N/NA)		
31.	Does the record describe (list) the designated uses of the water body to which the facility discharges (e.g., contact recreation, aquatic life use)? (Y/N)		
32.	Does the record provide effluent characteristics for each outfall? (Y/N)		
33.	Does the record document that a “reasonable potential” evaluation was performed? (Y/N)		
33a.	If yes, does the record indicate that the “reasonable potential” evaluation was performed in accordance with the State’s approved procedures? (Y/N/NA)		
34.	Does the record describe the basis for allowing or disallowing in-stream dilution or a mixing zone? (Y/N)		
35.	Does the record present WLA calculation procedures for all pollutants that were found to have “reasonable potential”? (Y/N/NA)		
36.	Does the record indicate that the “reasonable potential” and WLA calculations accounted for contributions from upstream sources (i.e., do calculations include ambient/background concentrations where data are available)? (Y/N/NA)		
37.	Does the permit contain numeric effluent limits for all pollutants for which “reasonable potential” was determined? (Y/N/NA)		
38.	Are all final WQBELs in the permit consistent with the justification and/or documentation provided in the record? (Y/N/NA)		
39.	For all final WQBELs, are BOTH long-term (e.g., average monthly) AND short-term (e.g., maximum daily, instantaneous) effluent limits established? (Y/N/NA)		
40.	Are WQBELs expressed in the permit using appropriate units of measure (e.g., mass, concentration)? (Y/N)		
41.	Does the record indicate that the permit will allow new or increased loadings to the receiving water? (Y/N)		
41a.	If yes, does the record indicate that an “antidegradation” review was performed in accordance with the State’s approved antidegradation policy? (Y/N/NA)		

**Monitoring and Reporting Requirements**

		Response	Comment
42.	Does the permit require at least annual monitoring for all limited parameters? (Y/N)		
42a.	If no, does the record indicate that the facility applied for and was granted a monitoring waiver, AND, does the permit specifically incorporate this waiver? (Y/N)		
43.	Does the permit identify the physical location where monitoring is to be performed for each outfall? (Y/N)		
44.	Does the permit require testing for Whole Effluent Toxicity in accordance with the State's standard practices ? (Y/N)		

**Special Conditions**

		Response	Comment
45.	Does the permit require development and implementation of a Best Management Practices (BMP) plan or site specific BMPs? (Y/N)		
46.	If yes, does the permit adequately incorporate and require compliance with the BMPs? (Y/N/NA)		
47.	If the permit contains compliance schedule(s), are they consistent with statutory and regulatory deadlines and requirements ? (Y/N/NA)		
48.	Are other special conditions (e.g., ambient sampling, mixing studies, TIE/TRE, BMPs, special studies) consistent with CWA and NPDES regulations? (Y/N/NA)		

**Standard Conditions**

		Response	Comment		
49.	Does the <b>permit</b> contain all 40 CFR 122.41 standard conditions? (Y/N)				
<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>List of Standard Conditions – 40 CFR 122.41</p> <ul style="list-style-type: none"> <li>• Duty to comply</li> <li>• Duty to reapply</li> <li>• Need to halt or reduce activity not a defense</li> <li>• Duty to mitigate</li> <li>• Proper O &amp; M</li> <li>• Permit actions</li> <li>• Property rights</li> <li>• Duty to provide information</li> <li>• Inspections and entry</li> </ul> </td> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> <li>• Monitoring and records</li> <li>• Signatory requirement</li> <li>• Reporting requirements                             <ul style="list-style-type: none"> <li>Planned change</li> <li>Anticipated noncompliance</li> <li>Transfers</li> <li>Monitoring reports</li> <li>Compliance schedules</li> <li>24 hour reporting</li> <li>Other non-compliance</li> </ul> </li> <li>• Bypass</li> <li>• Upset</li> </ul> </td> </tr> </table>				<p>List of Standard Conditions – 40 CFR 122.41</p> <ul style="list-style-type: none"> <li>• Duty to comply</li> <li>• Duty to reapply</li> <li>• Need to halt or reduce activity not a defense</li> <li>• Duty to mitigate</li> <li>• Proper O &amp; M</li> <li>• Permit actions</li> <li>• Property rights</li> <li>• Duty to provide information</li> <li>• Inspections and entry</li> </ul>	<ul style="list-style-type: none"> <li>• Monitoring and records</li> <li>• Signatory requirement</li> <li>• Reporting requirements                             <ul style="list-style-type: none"> <li>Planned change</li> <li>Anticipated noncompliance</li> <li>Transfers</li> <li>Monitoring reports</li> <li>Compliance schedules</li> <li>24 hour reporting</li> <li>Other non-compliance</li> </ul> </li> <li>• Bypass</li> <li>• Upset</li> </ul>
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50.	Does the permit contain the additional standard condition for existing non-municipal dischargers regarding pollutant notification levels [40 CFR 122.42(a)]? (Y/N)				