

NPDES Permit Quality Review Checklist - For POTWs

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 combined sewer overflow points) from the POTW treatment facility properly identified and authorized in the permit? (Y/N)		
13.	Does the record or permit contain a description of the wastewater treatment process and discharge point? (Y/N)		
14.	Does the record or permit describe the physical location of the facility? (Y/N)		
15.	Does the record or permit 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, effective, and expiration dates and authorized signatures ? (Y/N)		

Effluent Limits

Facility Name _____

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NPDES Permit Number _____

General Elements

		Response	Comment
19.	Does the record 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 (POTWs)

		Response	Comment
22.	Does the permit contain numeric limits for <u>ALL</u> of the following: BOD (or an alternative; e.g., CBOD, COD, TOC), TSS, pH, and percent removal? (Y/N)		
23.	Are percent removal requirements for BOD (or BOD alternative) and TSS included, and are they consistent with secondary treatment requirements (generally 85%; or modified in accordance with 40 CFR Part 133 allowances)? (Y/N)		
24.	Are technology-based permit limits expressed in appropriate units of measure (i.e., concentration, mass, SU)? (Y/N)		
25.	Are permit limits for BOD and TSS expressed in terms of both 30-day (monthly) average and 7-day (weekly) average limits ? (Y/N)		
26.	Are any concentration limitations in the permit less stringent than the secondary treatment requirements (30 mg/l BOD5 and TSS for a 30-day (monthly) average and 45 mg/l BOD5 and TSS for a 7-day (weekly) average)? (Y/N)		
26a.	If yes, does the record provide a justification (e.g., waste stabilization pond, trickling filter, etc.) for the alternate limitations? (Y/N/NA)		

Water Quality-Based Effluent Limits

		Response	Comment
27.	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)		
27a.	If yes, does the record indicate that a TMDL has been COMPLETED for the receiving water? (Y/N/NA)		
27b.	If yes, does the record indicate that any WQBELs were derived from a completed TMDL? (Y/N/NA)		
27.	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)		
28.	Does the record provide effluent characteristics for each outfall? (Y/N)		
29.	Does the record document that a “reasonable potential” evaluation was performed? (Y/N)		

29a.	If yes, does the record indicate that the “reasonable potential” evaluation was performed in accordance with the State’s approved procedures ? (Y/N/NA)		
30.	Does the record describe the basis for allowing or disallowing in-stream dilution or a mixing zone? (Y/N)		
31.	Does the record present WLA calculation procedures for all pollutants that were found to have “reasonable potential”? (Y/N/NA)		
32.	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)? (Y/N/NA)		
33.	Does the permit contain numeric effluent limits for all pollutants for which “reasonable potential” was determined? (Y/N/NA)		
34.	Are all final WQBELs in the permit consistent with the justification and/or documentation provided in the record? (Y/N/NA)		
35.	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)		
36.	Are WQBELs expressed in the permit using appropriate units of measure (e.g., mass, concentration)? (Y/N)		
37.	Does the record indicate that the permit will allow new or increased loadings to the receiving water? (Y/N)		
37a.	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
38.	Does the permit require at least annual monitoring for all limited parameters? (Y/N)		
38a.	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)		
39.	Does the permit identify the physical location where monitoring is to be performed for each outfall? (Y/N)		
40.	Does the permit require <u>influent monitoring</u> for BOD (or alternative) and TSS? (Y/N)		
41.	Does the permit require testing for Whole Effluent Toxicity? (Y/N)		

Special Conditions

		Response	Comment
42.	Does the permit include appropriate pretreatment program requirements? (Y/N/NA)		
43.	Does the permit include appropriate biosolids use/disposal requirements? (Y/N/NA)		
44.	Does the permit include appropriate storm water program requirements? (Y/N/NA)		
45.	If the permit contains compliance schedule(s), are they consistent with statutory and regulatory deadlines and requirements ? (Y/N/NA)		
46.	Are other special conditions (e.g., ambient sampling, mixing studies, TIE/TRE, BMPs, special studies) consistent with CWA and NPDES regulations? (Y/N/NA)		
47.	Does the permit allow discharges from Combined Sewer Overflows (CSOs) ? (Y/N)		
47a.	If yes, does the permit require implementation of the “Nine Minimum Controls” ? (Y/N/NA)		
47b.	If yes, does the permit require development and implementation of a “long-term control plan”? (Y/N/NA)		
47c.	If yes, does the permit require monitoring and reporting for CSO events? (Y/N)		
48.	Does the permit allow/authorize discharge of sanitary sewage from points other than the POTW outfall(s) or CSO outfalls [i.e., Sanitary Sewer Overflows (SSOs)]? (Y/N)		

Standard Conditions

		Response	Comment
49.	Does the permit contain all 40 CFR 122.41 standard conditions? (Y/N)		
<p>List of Standard Conditions – 40 CFR 122.41</p> <ul style="list-style-type: none"> • Duty to comply • Duty to reapply • Need to halt or reduce activity not a defense • Duty to mitigate • Proper O & M • Permit actions • Property rights • Duty to provide information • Inspections and entry 		<ul style="list-style-type: none"> • Monitoring and records • Signatory requirement • Reporting requirements <ul style="list-style-type: none"> Planned change Anticipated noncompliance Transfers Monitoring reports Compliance schedules 24 hour reporting Other non-compliance • Bypass • Upset 	
50.	Does the permit contain the additional standard condition for POTWs regarding notification of new introduction of pollutants and new industrial users [40 CFR 122.42(b)]? (Y/N)		