Self-Audit Project

Once NPDES Permittees understand the law and recognize the need to comply, they have a need to measure it. There are several ways to measure a permit’s strengths and weaknesses.

Most non-compliance issues are the result of failing to apply for, or comply with the NPDES permit. The **National Stormwater Center** (NSWC) wants to work with permittees to help them become compliant. We have teamed up with our non-profit neighbor **Conservation Preservation Environmental, Inc.**(CPE) to develop ways for permittees to evaluate their strengths and weaknesses:

1. The **Free** Self-Audit Template (Below)
2. Self-Audit Permit Assistance
3. Site Visit

*If you choose the****Free Self-Audit template****, you should replace each line item requirement on the audit template with your permit requirements. Also you can change the rating of each requirement to reflect your understanding of the importance of each permit requirement.*

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**Download Your Free Audit Template Below!**

\* indicates required

Email Address \*

First Name  


Last Name  


**Select a free audit for your business:**

*   Municipal Phase I
*   Construction Activity
*   Municipal Phase II
*   Industrial





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If you find that you need further assistance, the Self-Audit Permit Assistance or Site Visit, may be more helpful. For more information about how we can help you, [Click Here!](https://www.npdescompliance.org/self-audit-permit-assistance)

**Beyond the Download**

Local governments are encouraged to personalize the Self-Audit check by entering requirement in their NPDES stormwater permit in to the downloaded checklist. The Center, for a contribution of $99, will enter the requirement for a municipality if they provide a digital copy of their permit.

Should a local government want additional assistance, for a contribution of $5,000, the Center will dispatch one of the National Stormwater Center’s instructors to visit the permittee for two days. Part of the site visit will include inspection of selected facilities followed by document inspections. The contribution includes all expenses except in locations having excessive cost for food and lodging.

The instructor will assist the permittee with the evaluation and recommend, for each item, the % compliance to be entered in the self- audit checklist, however the level of compliance decision will be that of the permittee, not the instructor. Finally, the instructor will brief senior management of the evaluation, if requested.

Prior to the visit, the instructor needs to review specific documents and inspect other documents on site. The following table of documents (EPA Audit Table). The documents in red text should be provided in advance.

|  | **Document Request** | **Name of Document(s) Provided** | **Description / Comments / Notes** |
| --- | --- | --- | --- |
| **Program Management** | 1. Permit Notice of Intent. |  |  |
| 1. MS4 Annual Report s (two most recent Reporting Years). |  |  |
| 1. Organizational chart clearly indicating positions or divisions responsible for your MS4 program. |  |  |
| 1. Map of the permitted area and receiving waters, basins, and segments, including any TMDL or 303(d) listed waters (also provide on-site demonstration). |  |  |
| 1. Any formal agreements with other entities or local governments for implementation of your MS4 programs (e.g., memoranda of understanding). |  |  |
| **Illicit Discharge Detection and Elimination** | 1. Map showing the extent of the storm drain system, including outfalls. Onsite demonstration GIS-based map may be appropriate. |  |  |
| 1. Ordinance or other regulatory mechanism(s) prohibiting illicit discharges and connections to the MS4. |  |  |
| 1. Ordinance or other regulatory mechanism(s) to provide for entering onto private property to investigate and eliminate illicit discharges to MS4. |  |  |
| 1. Procedures for receiving and investigating public/employee complaints (e.g., call center and online reporting system). |  |  |
| 1. Example of tracking mechanism / inventory of illicit discharges identified and actions taken to control or eliminate the discharges (also provide on-site demonstration). |  |  |
| 1. Example/case file of an illicit discharge incident where enforcement was used (ideally full extent of enforcement authority). |  |  |
| 1. Written procedures to detect and address non-stormwater discharges, including illegal dumping (i.e., written protocol for IDDE program). |  |  |
| 1. Written procedures to field screen storm drain outfalls on a consistent basis. |  |  |
| 1. Records of field screening and tracking for storm drain outfall screening. |  |  |
| 1. Methods to inform public employees, businesses, and the general public of illegal discharges and improper waste disposal. |  |  |
| **Construction Site Stormwater Runoff Control** | 1. Map/inventory of current active construction sites in the permitted area showing location (differentiating City sponsored from private projects). |  |  |
| 1. Construction-related ordinances and regulatory mechanisms pertaining to erosion, sediment, and waste control (e.g., Water Protection Ordinance, Land Disturbing Permit) (Approved by MDE). |  |  |
| 1. Procedures for site inspection and enforcement of control measures (include tools such as checklists used for documenting inspections and enforcement activity). |  |  |
| 1. Construction inspection records (most recent Reporting Year)—The *Inspector will select specific sites during the onsite inspection.* |  |  |
| 1. Example/case file of a construction site issue where enforcement of ordinance or other regulatory mechanism(s) was used (ideally full extent of enforcement authority). |  |  |
| 1. Documentation of appropriate training for City field staff. |  |  |
| **Post Construction Stormwater Management** | 1. Map/inventory of post-construction stormwater management practices within the City's jurisdiction (differentiating City owned from private). |  |  |
| 1. Procedures for site plan review pertaining to post-construction and considering potential water quality impacts (including checklists used for reviews). |  |  |
| 1. Mechanism to ensure adequate long-term operation and maintenance by the owner of structural post-construction stormwater management practices. |  |  |
| 1. Procedures for post-construction stormwater management practice inspection and enforcement (including applicable checklists). |  |  |
| 1. Records of inspections and maintenance of post-construction stormwater management practices (most recent Reporting Year)—*EPA Inspection Team will select specific sites during the onsite inspection. Onsite demonstration of tracking database may be appropriate.* |  |  |
| 1. Documentation of training for City staff that conduct post-construction stormwater management practice inspections. |  |  |
| **Pollution Prevention and Good Housekeeping** | 1. Map/inventory of City facilities and properties within the permitted area (e.g., road maintenance facilities, stockpile sites, storage and material handling areas, etc.) |  |  |
| 1. Documentation for municipally owned activities permitted under NPDES or any other State or federal water pollution control program. |  |  |
| 1. Documentation or guidance manual for BMPs or runoff controls geared toward fleet yard and building maintenance activities. |  |  |
| 1. Pollution prevention or good housekeeping procedures for municipal facilities and activities. |  |  |
| 1. Example of Storm Water Pollution Plan (SWPPP) or similar document developed for a municipal industrial facility, if applicable. |  |  |
| 1. Any MOUs or other binding contracts between the Permittee and other entities to assist in compliance with the MCM. |  |  |
| 1. Employee/maintenance personnel training plan, records, and syllabus pertaining to pollution prevention and good housekeeping (most recent Reporting Year). |  |  |