LNBA – Inspection Prep & Tips

July 29, 2025

July 31, 2025

Division of Water Resources

PREPARING FOR AN INSPECTION

PURPOSE

TYPE

PREPARATION

OPENING CONFERENCE

FILE/DATA REVIEW

FACILITY INSPECTION

CLOSING CONFERENCE

INSPECTION LETTER/REPORT

NPDES and Collection System inspection focus

Inspection Purpose

1. **Determine Compliance** – regulations, permits, program requirements
2. **Verify Accuracy** – information provided
3. **Verify Adequacy** – sampling/monitoring

Other reasons:

- Gather information/evidence – support enforcement action
- Gather information – support permitting process
- Assess compliance – consent orders (SOC)

Inspection Type

- Scheduled
- Unscheduled
- Complaint
- Other

- NCGS 143-215.3(a.)(2.)

Inspection Preparation

- Read and know your permit!
- Ask for the purpose of the inspection and information needed (scheduled, violations, sampling, complaint, training, etc.)
- Have appropriate staff attend the inspection
- Allow ample time for the inspection
- Organize files/records/data
- Violations/non-compliance – know and explain recent/past violations
- Laserfiche
- Clean-up and make repairs

NORTH CAROLINA
Department of Environmental Quality

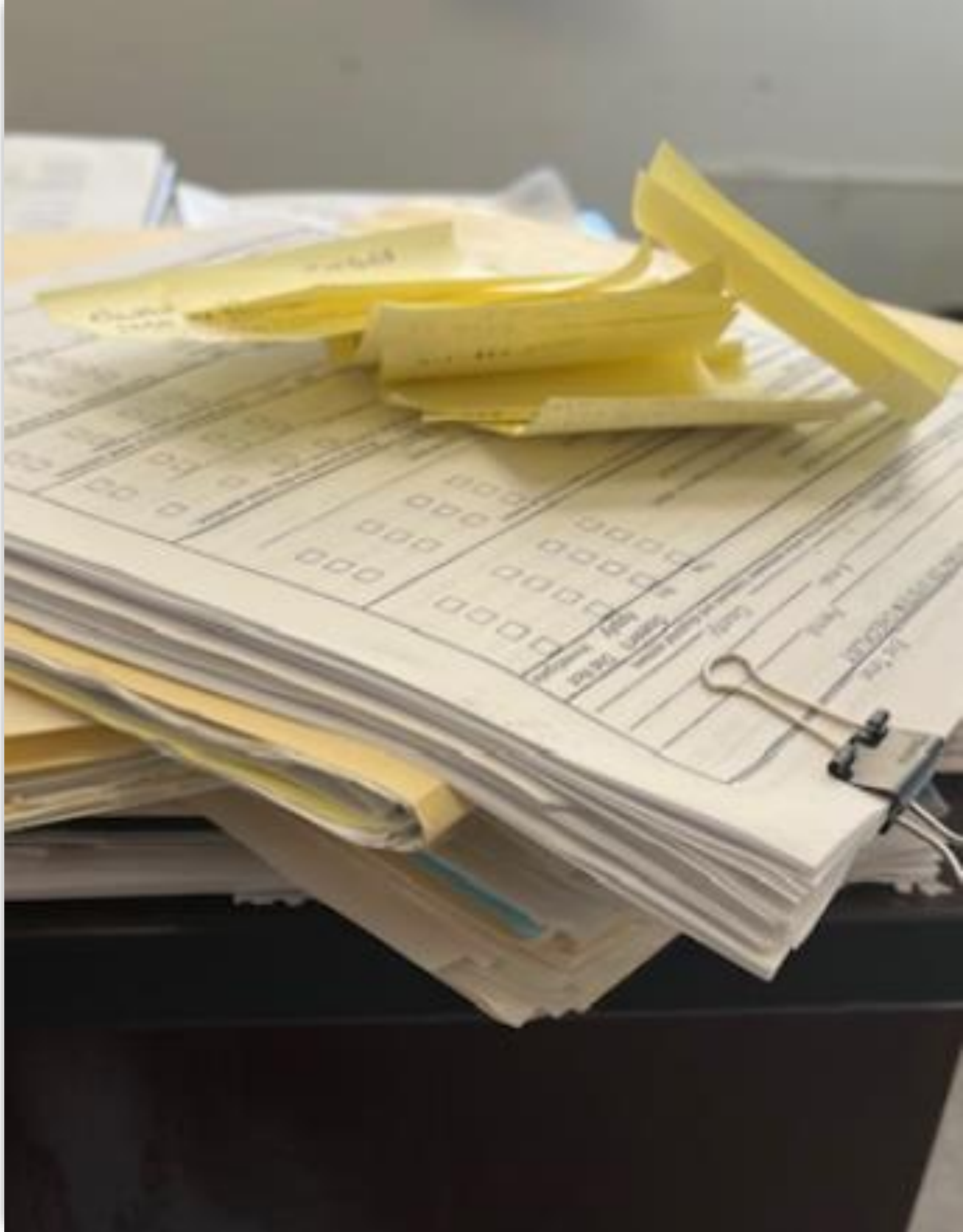
Opening Conference

- Introductions – who’s who and permit affiliations
- Kick-off meeting
  - Purpose - inspection/objectives
  - Inspection order
  - Review safety requirements/considerations
  - Review any special permit conditions
  - List of records needed for review
  - Notify inspector of any compliance issues or equipment out of service

DEQ
NORTH CAROLINA
Department of Environmental Quality

File/Data Review

- Maintain organized records
- Explain how files are organized (helps with review and time)
- Know where records are stored for access (file folders/electronic/accessible/nearby)
- Clearly labeled binders/folders/files - always a good idea
- Originals – have copies of original/current signed documents (don't forget modifications)
- Remember record retention – lifetime, 5 yr, 3 yr, etc.



File/Data Review - Continued

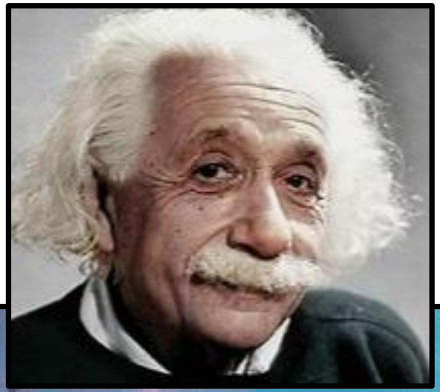
- Compare DMRs with bench sheets/logs/reports
- Always write it down! – keep a written/documented contemporaneous file
- DMRs - signed and certified
- Data – NC Lab Certified? (correct methods/detection levels/lab cert #)
- Lab Reports (keep entire report – calibration records/qualifiers/COC/etc.)
- Sampling – should be representative. (sample times, calibrations, start/stop, volumes, etc.)

File/Data Review - Continued

- Have copies:
  - Discharge Monitoring Reports (DMR)
  - Current Permit
  - Annual Reports (performance/CCR/sludge, etc.)
  - Standard Operating Procedures
  - Capital Improvement Plan/Budget
  - Operations and Maintenance Logs
  - Non-compliance letters (violations, SSO, etc.)
  - Maps
  - Bench Sheets/Lab Reports
  - Reportable & Non-reportable SSO reports

Facility Inspection

- Explain your facility/process (process flow diagrams can help)
- Show off your facility (highlight good/bad and what is new)
- Notify inspector of projects, equipment out of service, non-compliance, improvements, etc.
- Start tour from the beginning – walk through as the water flows (as best you can)
- Explain how your system works – don't expect the inspector to know your system
- Lots of questions – Inspector may ask a lot of questions
- Explain and interpret data - what do the numbers mean
- Explain sampling protocol and sampler setup – representative sampling is very important
- Explain equipment calibration – samplers, flow meters, analyzers
- Ask the inspector questions
- If there are areas you need help with, let the
- Don't leave it to perception!



What is this a picture of?

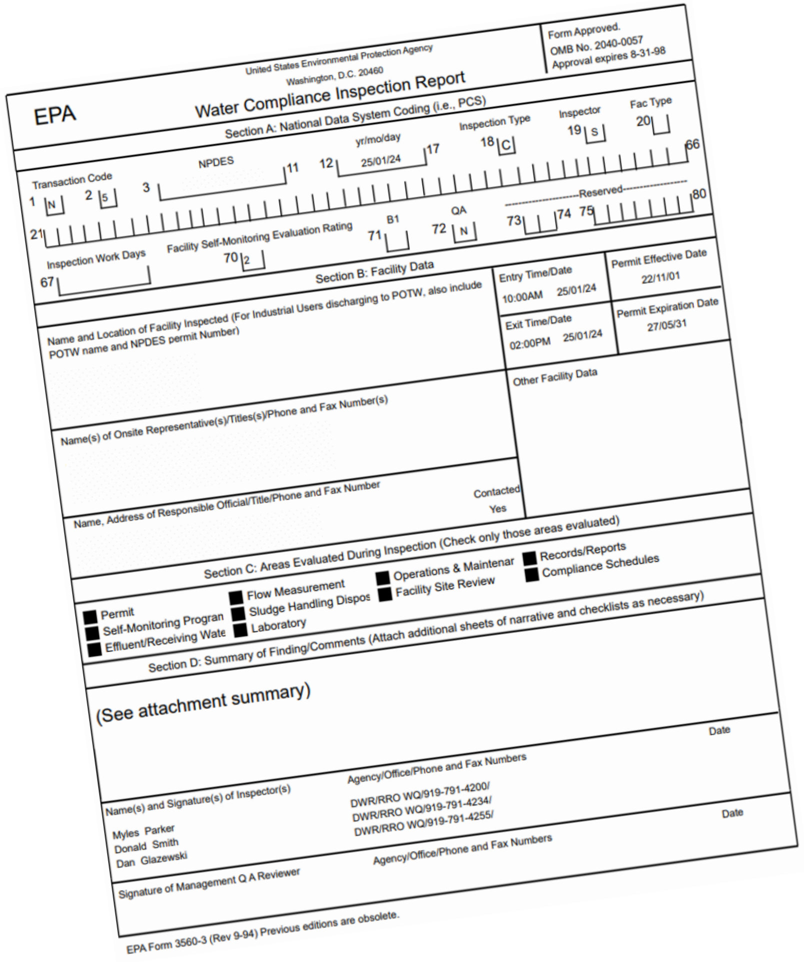
NORTH CAROLINA
Department of Environmental Quality

Closing Conference

- Review notes and observations from the inspection
- Ask/answer/clarify any remaining questions
- Identify areas of concern, violations, or items that will be included in the inspection letter/report
- Review requested documents or follow up information
- No major surprises with inspection letter/report

Inspection Letter and Report

- Expect letter/report with 2-4 weeks
- Letter will include overview of facility, observations, non-compliance
- Letter may include recommendations, attachments, violations, or requirements to respond
- Letter and report typically mailed to permit owner affiliate. Other affiliates can request email copy
- Report is generated from Basin-wide Information System (BIMS) and should closely match facility permit/process/equipment
- Follow up if there are questions or incorrect information
- Inspections are reported to EPA & filed in Laserfiche
- Response request – written REPLY and details matter!


United States Environmental Protection Agency
Washington, D.C. 20460
EPA Water Compliance Inspection Report
Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)
Transaction Code 1 N 2 5 3 NPDES 11 12 yr/mo/day 25/01/24 17 Inspection Type 18 C Inspector 19 S Fac Type 20 66
21 Reserved 80
Inspection Work Days 67 Facility Self-Monitoring Evaluation Rating 70 2 B1 71 QA 72 N 73 74 75

Section B: Facility Data
Name and Location of Facility Inspected (For Industrial Users discharging to POTW, also include POTW name and NPDES permit Number)
Entry Time/Date 10:00AM 25/01/24
Permit Effective Date 22/11/01
Exit Time/Date 02:00PM 25/01/24
Permit Expiration Date 27/05/31
Name(s) of Onsite Representative(s)/Titles(s)/Phone and Fax Number(s)
Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number
Contacted Yes

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)
Permit
Self-Monitoring Program
Effluent/Receiving Water
Flow Measurement
Sludge Handling Dispos
Laboratory
Operations & Maintenar
Facility Site Review
Records/Reports
Compliance Schedules

Section D: Summary of Finding/Comments (Attach additional sheets of narrative and checklists as necessary)
(See attachment summary)

Name(s) and Signature(s) of Inspector(s)
Myles Parker
Donald Smith
Dan Glazewski
Agency/Office/Phone and Fax Numbers
DWR/RRO WQ/919-791-4200/
DWR/RRO WQ/919-791-4234/
DWR/RRO WQ/919-791-4255/
Date
Signature of Management Q A Reviewer
Agency/Office/Phone and Fax Numbers
Date
EPA Form 3560-3 (Rev 9-94) Previous editions are obsolete.

NORTH CAROLINA Department of Environmental Quality DEQ

QUESTIONS ?

Contact Information

Donald Smith
Environmental Program Consultant
Division of Water Resources – Raleigh
Main #: (919) 791-4200
Office #: (919) 791-4234
Email: donald.smith@deq.nc.gov

DEQ website: www.deq.nc.gov