

NPDES Cost of Compliance Checklist

The purpose of this checklist is to guide NPDES permit writers through the necessary Cost of Compliance evaluation. The NPDES permit writer is responsible for ensuring that all explanations documented in this checklist are incorporated and expanded upon in the Fact Sheet of the permit. See the Checklist Guide for further information on how to use the checklist and additional information.

I. Address Duplication of NPDES Permit Receiving Water Monitoring Requirements		
Does the current permit include rationale for receiving water monitoring that is based on 1) effluent quality and 2) receiving water quality (including any applicable TMDLs)?	Yes	No
I.A. Regional Monitoring Programs (RMPs)		
1. Is participation in a RMP feasible, if not already considered?	Yes	No
Explain the feasibility or infeasibility of using collaborative study efforts.		
2. Refer to the list of existing RMPs.		
3. See Checklist Guide for example language that incorporates Regional Monitoring Program requirements into a permit.		
I.B. Regional Agency-Based Monitoring		
1. Did the Discharger provide data from an agency which conducts monitoring comparable with the Surface Water Ambient Monitoring Program?	Yes	No
2. Can monitoring data from the agency be used to satisfy monitoring requirements in lieu of discharger-performed monitoring? Explain.		
3. Refer to the list of agency-based monitoring databases.		
4. See example language in the Checklist Guide.		
I.C. Collaborative Study Efforts		
Will the reporting requirements consider any established collaborative study efforts?	Yes	No
Explain the feasibility or infeasibility of using collaborative study efforts.		

II. Reduce Monitoring for Entities Based on Positive Compliance Record for Specific Constituents/Parameters

II.A. Reduce Monitoring Frequency at the Time of Permit Reissuance

1. Will monitoring for this permit be reduced based on data from the last permit cycle?	Yes	No
---	-----	----

If yes, the Fact Sheet should provide the constituents and justification for reduction. If no, ensure rationale for existing monitoring frequency is included in the Fact Sheet.

2. [Refer to the summary of minimum monitoring frequencies established by regulations and existing Water Board practices.](#)

II.B. Reduce Monitoring Frequency During the Permit Cycle

1. Will monitoring for this permit be reduced based on results collected during the permit cycle?	Yes	No
---	-----	----

If yes, the Fact Sheet should provide the constituents and justification for reduction. If no, provide explanation in the Fact Sheet.

2. [Refer to the list of existing permits for examples of permits that contain language that adjusts monitoring frequency.](#)

II.C. Increase Monitoring Frequency During the Permit Cycle

1. Were any monitoring frequencies for this permit increased as a result of data from the last permit cycle?	Yes	No
--	-----	----

If yes, the Fact Sheet should provide the constituents and justification for the increase in monitoring frequency.

2. [Refer to the list of existing permits for examples of permits that contain language that adjusts monitoring frequency.](#)

III. Encourage Use of Surrogate Monitoring Where Appropriate

1. Are there surrogate constituents or parameters that can be used to properly represent and can be substituted for similar constituents/parameters?	Yes	No
2. Provide the justification for using the surrogate.		
3. Refer to the list of example surrogate constituents and parameters.		

IV. Eliminate Irrelevant and Unnecessary Reports

IV.A. Options for Data Submission and Adequate Justification

1. List the reports or studies required for this permit.
2. Why are these reports required? Who will review them? What will be done with them?
3. In lieu of a full report, can the Discharger submit an alternate report type?
4. Refer to the examples of reports considered unnecessary.

IV.B. Options for Small Disadvantaged Communities

Consider reporting alternatives for small disadvantaged communities.
--