Industrial Stormwater MSGP Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
EPA 2021 Multi-Sector General Permit (MSGP) Parts 1–7
EPA MSGP Part 8 — Sector-Specific Requirements
40 CFR 122.26 — NPDES Stormwater Discharge Requirements
EPA Industrial SWPPP Template and Guidance
EPA Industrial Stormwater Monitoring and Sampling Guide
EPA NeT-MSGP Electronic Reporting Tool
EPA Authorization Status — Stormwater Permitting Authority by State

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

Permit Coverage and Eligibility

Audit Item	Expected Finding	Status	Notes / Evidence
NOI and permit coverage	A Notice of Intent (NOI) was submitted through NeT-MSGP and permit coverage is active. The NOI accurately reflects current facility operations, SIC codes, discharge points, and receiving waters. If facility operations have changed since the NOI was filed, a revised NOI has been submitted. Permit coverage documentation is maintained on-site. *» Ref: 2021 MSGP Part 1.2, 1.3*		
Sector identification	The facility's applicable industrial sector(s) among the 29 MSGP sectors have been correctly identified based on SIC codes and on-site activities. Sector-specific requirements from Part 8 of the MSGP are identified and addressed in the SWPPP. If multiple sectors apply, all applicable sector requirements are addressed. *» Ref: 2021 MSGP Part 8, Appendix D*		
No exposure certification (if applicable)	If the facility qualifies for a No Exposure Certification (NEC) under 40 CFR 122.26(g), a certification has been filed and all industrial materials and activities remain sheltered from		

Audit Item	Expected Finding	Status	Notes / Evidence
	precipitation and runoff. The NEC is recertified at least every five years. If any exposure condition changes, an NOI is submitted for MSGP coverage. » *Ref: 40 CFR 122.26(g), 2021 MSGP Part 1.5*		
Permit signage	A sign of permit coverage is posted at a safe, publicly accessible location in close proximity to the facility per Part 1.3.5. The sign uses a font large enough to be readily viewed from a public right-of-way and includes permit number, operator name, NOI tracking number, and contact information. If local ordinances prohibit signage, the prohibition is documented in the SWPPP. » *Ref: 2021 MSGP Part 1.3.5*		

SWPPP Development and Implementation

Audit Item	Expected Finding	Status	Notes / Evidence
SWPPP completeness	A SWPPP has been developed and is available on-site per Part 6. The SWPPP includes all required elements: stormwater pollution prevention team, facility description and site map, summary of potential pollutant sources, description of stormwater control measures (SCMs), schedules and procedures for monitoring, and documentation supporting eligibility determinations. The SWPPP was completed before the NOI was submitted. » *Ref: 2021 MSGP Part 6*		
Site map and drainage	The SWPPP site map identifies all outfall locations, direction of stormwater flow, structural SCMs, areas of industrial activity exposed to precipitation, materials storage areas, vehicle fueling and maintenance areas, receiving waters, and areas of existing or potential soil contamination. The map is current and reflects actual site conditions. » *Ref: 2021 MSGP Part 6.2.2*		
Pollutant source assessment	The SWPPP includes a description of potential pollutant sources for each area of industrial activity exposed to stormwater. The assessment identifies industrial activities and associated pollutants, spill and leak history, material handling and storage areas, significant dust or particulate generating processes, and areas where erosion may occur. Non-stormwater discharges are evaluated per Part 1.1.4. » *Ref: 2021 MSGP Part 6.2.3*		
Stormwater control measures	The SWPPP documents SCMs implemented to minimize pollutant discharge including good housekeeping, preventive maintenance, spill prevention and response, erosion and sediment controls, management of runoff, and salt/sand storage. SCMs are appropriate for identified pollutant sources and are consistent with sector-specific requirements in Part 8. SCM		

Audit Item	Expected Finding	Status	Notes / Evidence
	effectiveness is monitored through inspections and monitoring data. » Ref: 2021 MSGP Part 2.1, Part 6.2.4		
SWPPP availability	The SWPPP is made publicly available per Part 6.5 either as an attachment to the NOI in NeT-MSGP, posted on a public website, or available upon request. The SWPPP is kept up to date and revised to reflect changes in facility operations, control measures, monitoring results, and corrective actions. » Ref: 2021 MSGP Part 6.5		

Monitoring Program

Audit Item	Expected Finding	Status	Notes / Evidence
Quarterly visual assessments	Visual assessments of stormwater discharges are conducted quarterly per Part 3.2 during daylight hours from each substantially different outfall. Assessments evaluate color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution. Results are documented with date, time, outfall, weather conditions, and observations. » Ref: 2021 MSGP Part 3.2		
Benchmark monitoring	If required for the facility's sector(s), benchmark monitoring is conducted per Part 4.2.1 during the first and fourth years of permit coverage. Samples are collected quarterly from each outfall for applicable parameters (sector-specific). Four-quarter averages are compared to benchmark threshold values. Sampling follows proper protocols for grab or composite samples within the first 30 minutes of discharge (or as soon as practicable). » Ref: 2021 MSGP Part 4.2.1		
Indicator monitoring	If required for the facility's sector(s), indicator monitoring for pH, TSS, and COD is conducted quarterly on a report-only basis per Part 4.2.1.1. PAH monitoring is conducted bi-annually (twice per year) in the first and fourth years for applicable sectors. Results are reported but do not trigger AIM requirements. » Ref: 2021 MSGP Part 4.2.1.1		
Effluent limitation monitoring	If the facility is subject to numeric effluent limitations (based on EPA effluent limitation guidelines at 40 CFR Parts 405–471 or other permit conditions), compliance monitoring is conducted at the required frequency. All discharge points receiving flows from applicable industrial activities are monitored. The Substantially Identical Discharge Point (SIDP) exception does not apply to effluent limit monitoring. » Ref: 2021 MSGP Part 4.1, 40 CFR 405–471		
Impaired waters monitoring	If the facility discharges to an impaired water body (listed on the state's 303(d) list), additional monitoring for the impairment pollutant(s) is		

Audit Item	Expected Finding	Status	Notes / Evidence
	conducted annually throughout the first year and in the fourth year for pollutants associated with industrial activity per Part 4.2.3. No discharge of pollutants of concern to impaired waters without an approved TMDL occurs unless consistent with the assumptions of the applicable TMDL. » *Ref: 2021 MSGP Part 4.2.3*		

Inspections and Corrective Actions

Audit Item	Expected Finding	Status	Notes / Evidence
Quarterly facility inspections	Routine facility inspections are conducted at least quarterly per Part 3.1 by qualified personnel. Inspections cover all areas of industrial activity, SCMs, discharge points, and potential pollutant sources. Inspection reports are completed and include date, inspector name, weather conditions, findings, and any corrective actions needed. Inspections are conducted during periods of active discharge when practicable. » *Ref: 2021 MSGP Part 3.1*		
Corrective action procedures	Corrective actions are initiated within 14 calendar days of identifying any condition requiring correction per Part 5.1. Conditions triggering corrective action include: unauthorized release or discharge, SCM inadequacy, benchmark exceedance requiring AIM, or any other permit noncompliance. The SWPPP is revised to document corrective actions taken. If corrections cannot be completed within 14 days, a plan with timeline is documented. » *Ref: 2021 MSGP Part 5.1*		
Additional Implementation Measures (AIM)	The three-tiered AIM system is implemented when benchmark thresholds are exceeded per Part 5.2. AIM Level 1: Review SWPPP and control measures, continue monitoring until acceptable levels are obtained. AIM Level 2: Implement additional pollution prevention and good housekeeping measures if exceedance recurs. AIM Level 3: Install permanent structural source controls and treatment controls if exceedance continues. AIM status and actions are documented in the SWPPP. » *Ref: 2021 MSGP Part 5.2*		

Reporting and Recordkeeping

Audit Item	Expected Finding	Status	Notes / Evidence
Annual report submission	An annual report is submitted electronically via NeT-MSGP by January 30 each year per Part 7.4. The report summarizes monitoring data, inspection findings, corrective actions taken, AIM status, SWPPP modifications, and any noncompliance incidents. The report is certified by an authorized signatory. » *Ref: 2021 MSGP Part 7.4, Appendix I*		

Audit Item	Expected Finding	Status	Notes / Evidence
Discharge monitoring reports	If required, discharge monitoring reports (DMRs) are submitted through NeT-MSGP for benchmark monitoring, indicator monitoring, and effluent limitation monitoring results per Part 7.2. Data is submitted within the timeframes specified in the permit. » *Ref: 2021 MSGP Part 7.2*		
Record retention	All records related to permit compliance are retained for at least three years per Part 7.8 including monitoring data, inspection reports, SWPPP revisions, corrective action documentation, and training records. Records are available for review by EPA, state agencies, and the public. Records related to any pending litigation or enforcement action are retained until the matter is resolved. » *Ref: 2021 MSGP Part 7.8*		
Permit termination procedures	If the facility ceases industrial activities or otherwise no longer requires MSGP coverage, a Notice of Termination (NOT) is filed through NeT-MSGP per Part 1.4. Final site stabilization or transfer of permit coverage to a new operator is completed before termination. A NOT is not required when transitioning to a new version of the MSGP. » *Ref: 2021 MSGP Part 1.4*		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review