



MS4 OVERSIGHT INSPECTIONS:

How To Increase the Value through Partnering

2018 National Stormwater Roundtable

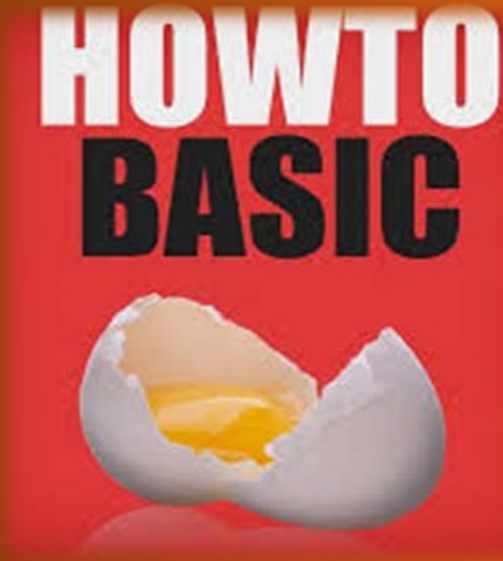
Atlanta, GA

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Overview

- What is an MS4 Oversight Inspection?
- Why do we do it?
- How do we make it count? (Prep-work)
- What are the goals?
- How do we make it count? (Intent)
- Value/Benefit Achieved

What's Not Included



- Detailed step-by-step guidance on conducting an MS4 audit.
- Individual program elements
- SWMP and Permit requirements

Visit EPA's website for additional MS4 resources:
<http://cfpub.epa.gov/npdes/stormwater/munic.cfm>

What is an Oversight Inspection?

Also known as an Audit, the purpose of an MS4 Oversight Inspection is to conduct a comprehensive MS4 program evaluation and determine if the permittee is implementing the program in order to reduce pollutants discharged to the Maximum Extent Practicable (MEP).

They are done in partnership with the States

What is an Oversight Inspection?

It is ultimately based on the requirements in the MS4 permit and commitments made in the MS4's stormwater management program (SWMP).

These are your primary references for a specific MS4 program evaluation.

Why do we do it?

- Determination of compliance, or recognized need for compliance assistance.
- Build a stronger working relationship between EPA, the State and the permittee.
- Ensure better understanding by the permittee of the permit requirements.
- Ensure better understanding of the permittee's operations, priorities, & challenges.

How does it benefit us?

So How Do We Make it Count?....Prep-work and Intent

- Consult with your State
- Know the MS4
- Identify your goal
- Familiarize yourself with their SWMP and Permit
- Use your audit checklists

Prep-work

What is the Goal of your Audit?

- Determination of compliance status?
- Assistance with permit issuance or renewal?
- Phase II SWMP development?
- Assessing pollutants of concern?
- Technical assistance?

Identifying your overall goals will help in developing your schedule and focus.

Determining Compliance Status

- Is the MS4 adhering to its permit requirements?
- Is a comprehensive SWMP developed and fully implemented?
- Are staff trained and knowledgeable?

Assessing Pollutants Of Concern

If there are known pollutants common in urban stormwater, or a particular water body is impaired, an oversight inspection would be beneficial in determining the effectiveness of the MS4's SWMP implementation.

If an MS4 is discharging to a waterbody that has a **total maximum daily load** (TMDL), a program evaluation may assist the permitting authority in assigning an applicable **waste load allocation**, while also assisting the permittee in implementing the steps necessary to comply with the waste load allocation.

Phase II SWMP Development

- Many Phase II MS4s are just beginning to implement their SWMP; compliance assistance is a valuable and much needed tool.
- Region 6 conducted 8 small MS4 Pre-Assessments in FY17 with compliance assistance as the goal.

Our Process

The Pre-Assessment was designed to look at the management, operations, and maintenance portions of the sMS4 SWMP via:

- Issued 308 Information Request letter for Modules developed by our team.
- Interviewed the sMS4 for an overview of their SWMP;
- Observed the inspection techniques of sMS4 Inspectors to check proper application in detecting and addressing areas of concern at a site; and,
- WE Inspected sMS4's owned, operated and regulated facilities for permit compliance

The purpose of the Pre-Assessment and Inspection was to evaluate the MS4's compliance with its Phase II Stormwater permit and prioritize their Stormwater Program for a possible comprehensive Audit by EPA at a later date.

So How Do We Make it Count?....Prep-work and Intent

- The intent is to ensure that the MS4 inspector knows their job, rather than doing it for them.
- Use your audit checklists
- Observe, Observe, Observe

Intent

Construction Field Inspection Worksheet

Permittee:	
Address of project:	Size of project: NOI?
Date of visit:	Time of visit:
Name of permittee's inspector(s):	
Provide the name(s) and title(s) of site superintendent or contractor(s) present during inspection	
Name	Title
Evaluator Observations:	
<i>Inspector Training/Knowledge</i>	
Is the inspector knowledgeable about:	
<ul style="list-style-type: none"> ○ Erosion and sediment control BMPs, ○ Stormwater/pollution prevention BMPs, ○ Local stormwater requirements, and ○ Legal authority (ordinances)? 	
Is the inspector familiar with the requirements in the State stormwater construction general permit?	
What type of stormwater training did the inspector receive? When, and how often?	
<i>Inspection Procedures</i>	
Is a checklist used during the inspection?	
Is the inspector aware of previous stormwater inspection results at this site?	
Does the inspector review the approved plans (erosion and sediment control and/or SWPPP) required to be at the construction site?	
Does the inspector walk the entire site and inspect all points of discharge?	
Does the inspection address:	
<ul style="list-style-type: none"> ○ Erosion control ○ Sediment control ○ Waste management practices ○ Non-stormwater discharges? 	
Did the inspector miss obvious violations?	
Are inspection findings documented in writing and presented to the site contact?	
<i>Compliance/Enforcement</i>	
How does the inspector address compliance issues (verbal warnings, NOV, stop work order, etc)?	
If there are compliance issues identified, is a deadline given for correction?	
<i>Education</i>	
Are any materials or brochures given to the site contact to educate them about appropriate BMPs?	

Construction Inspection Checklist

MS4 Program Evaluation Guidance

https://www3.epa.gov/npdes/pubs/ms4guide_withappendixa.pdf

MS4 Maintenance Facility Field Inspection Worksheet

Permittee:	
Address of facility:	Size of facility:
Date of visit:	Time of visit:
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	
Does the permittee conduct and document periodic inspections of the facility?	
Are storm drains labeled and free of debris?	
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	
Are fueling stations properly designed with spill kits nearby?	
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	
Waste management	
Are waste bins covered with waste properly disposed in containers?	
How is landscape waste stored?	
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	
Employee training	
What type of stormwater training do maintenance staff receive?	
Notes or additional information:	

MS4 Maintenance Facility Checklist



MS4 Program Evaluation Guidance

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Industrial/Commercial Facility Field Inspection Worksheet

Permittee:		
Address and Name of facility:	Size of project:	NOI?
Date of visit:	Time of visit:	
Name of permittee's inspector(s):		
Provide the name(s) and title(s) of facility representatives present during inspection		
Name	Title	
Evaluator Observations:		
<i>Inspector Training/Knowledge</i>		
Is the inspector knowledgeable about:		
<ul style="list-style-type: none"> ○ Source Control BMPs, ○ Treatment Control BMPs, ○ Local stormwater requirements, and ○ Legal authority (ordinances)? 		
Is the inspector familiar with the requirements in the State stormwater industrial general permit?		
What type of stormwater training did the inspector receive? When, and how often?		
<i>Inspection Procedures</i>		
Is a checklist used during the inspection?		
Is the inspector aware of previous stormwater inspection results at this site?		
Does the inspector review the BMPs in the industrial SWPPP (if available)?		
Does the inspector walk the entire facility and inspect all points of discharge?		
Does the inspection address:		
<ul style="list-style-type: none"> ○ Good housekeeping practices ○ Spill prevention and response ○ Materials handling and storage ○ Waste management practices ○ Non-stormwater discharges? 		
Did the inspector miss obvious violations?		
Are inspection findings documented in writing and presented to the facility representative?		
<i>Compliance/Enforcement</i>		
How does the inspector address compliance issues (verbal warnings, NOV, stop work order, etc)?		
If there are compliance issues identified, is a deadline given for correction?		
<i>Education</i>		
Are any materials or brochures given to the facility representative to educate them about appropriate BMPs?		

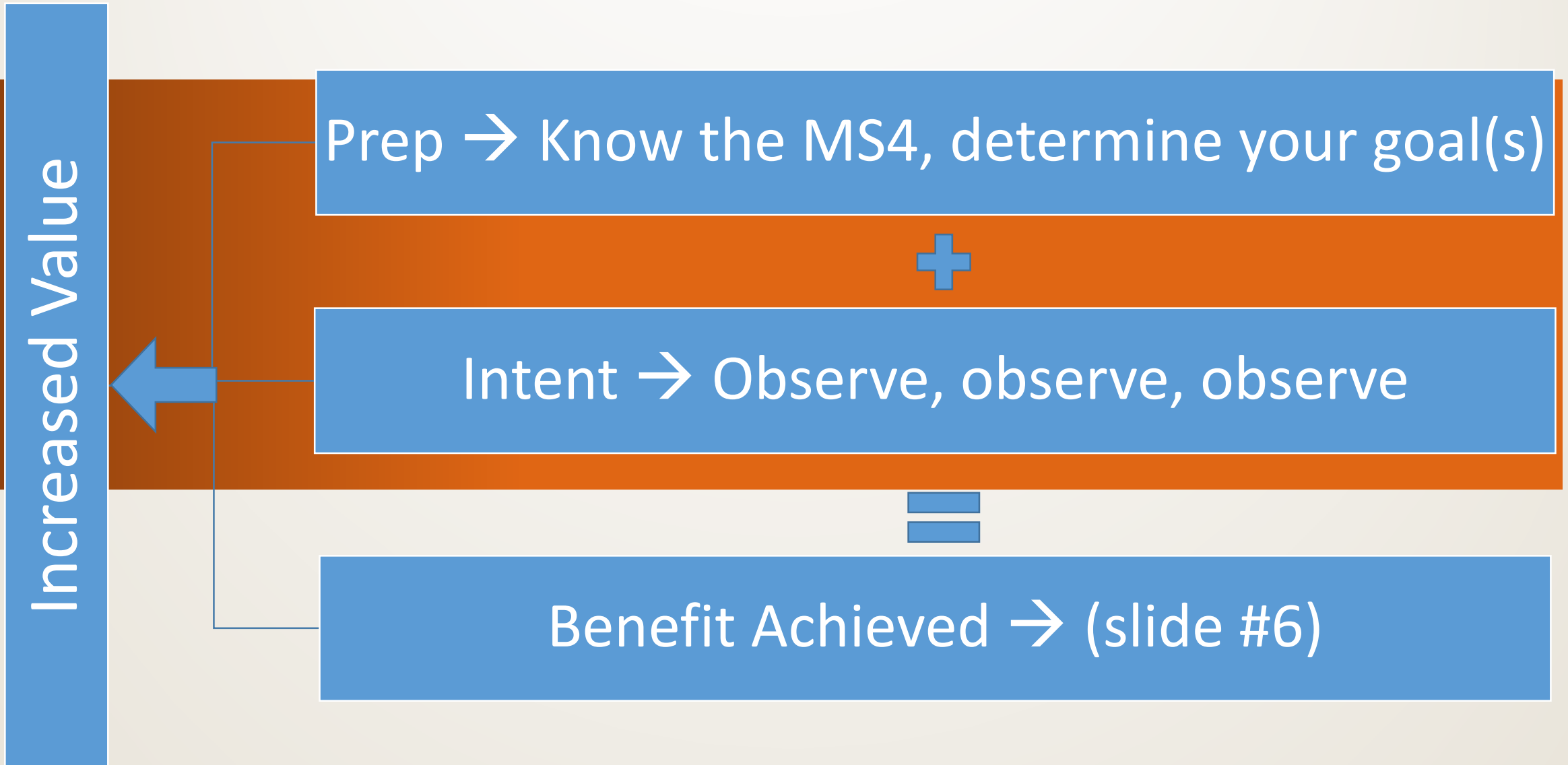
Industrial/Commercial Facility Checklist



MS4 Program Evaluation Guidance

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Value Summary



Our Benefit

What did you like about the Pre-Assessment?

*We enjoyed the opportunity to share our MS4 program with the EPA. The pre-assessment also gave us a chance to express the importance of this program to other departments within the City.

*Having open discussions about program implementation in the beginning makes it much easier to understand what types of documents may help to evaluate program effectiveness and success.

*The Inspectors took the approach that they were there to “help us” and not “catch us” doing something wrong. They offered some very good suggestions, which were appreciated. I also liked how reasonable the Inspectors were.

*It forced us to stop and take a look at our current program.

Our Benefit

What would you change about the Pre-Assessment?

*I wish I had a suggestion for improvement but I don't. It was very informative and I feel I have a better understanding of the objective of the program after the pre-assessment.

*We had 12 visitors. There may be a way to do it with less people. I would have liked to receive the written report a little sooner.

Our Benefit

Did the Inspector/s clearly communicate areas for attention (if applicable) at the exit interview?

*Yes. The final report had clear achievable recommendations which we have begun to implement.

*Yes, we had a few areas that we could improve in. The suggestions included improvements in our Data Management and suggestions in creating more measurable goals. I also liked that some positive things were pointed out as well. It was nice to hear some of the things that we are doing well on and some things we can improve on. I thought it was a perfect evaluation.

Questions?

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