LDEQ Storm Water/ Small Municipal Separate Storm Sewer Systems (MS4) Program Update

February 5, 2020





Storm Water Priorities

- Storm water permit compliance is a national priority for EPA.
- LDEQ is delegated by the EPA to implement the National Pollutant Discharge Elimination System (NPDES) permit program in Louisiana (LPDES).
- EPA establishes commitments LDEQ must achieve through the Priority Partnership Grant (PPG).
- MS4 compliance reviews were added to LDEQ's grant commitments in FY2019.
- Although LDEQ issues permits, EPA R6 still conducts audits of both Phase I and Phase II permitted MS4s in Louisiana.



Phase II MS4 Remand Rule

- LDEQ incorporated EPA's Phase II MS4 Remand Rule into the state's regulations
- Public Hearing Date and Comment Deadline:
- May 25, 2017
- No Comments were received
- LDEQ submitted the following items to the Office of the State Register for publication in the July 20, 2017, issue of the Louisiana Register:
 - Final Rule (WQ095ft); effective July 20, 2017: Municipal Separate Storm Sewer Systems General Permit Revisions (LAC 33:IX.2515, 2521, 2523, and 2525)



Phase II MS4 Remand Rule

- Most edits changed "MS4 operator shall..." to "State administrative authority shall..."
- LDEQ included both Option I and Option II under LAC 33:IX.2515 – General Permits.
- LDEQ is implementing Option II (2-step permit process).



Permit Updates



Small MS4s and LDEQ Review of Renewal NOIs/SWMPs

- Master General Permit for Discharges from Small MS4s (LAR040000)
 - Issued 8/17/18 and Effective 9/1/18
- LDEQ Water Permits staff review all Phase II Stormwater Management Plans (SWMPs) to ensure permit compliance to the Maximum Extent Practicable (MEP).
- LAR040000 NOI & SWMP:
 - If deficiencies noted, LDEQ responds with a Notice of Deficiency (NOD).
 - If no deficiencies noted, LDEQ responds with an administrative completeness email



Reissued Small MS4 Permits (since June, 2019)

- Total = 30
- Ascension Parish (LAR041034)
- City of Alexandria (LA041009)
- City of Baker (LAR041052)
- City of Bastrop (LAR041005)
- City of Bossier City (LAR040001)
- Bossier Parish Police Jury (LAR041040)
- City of Breaux Bridge (LAR041016)
- City of Broussard (LAR041021)
- Parish of Caddo (LAR041014)
- City of Covington (LAR041038)
- City of Crowley (LAR041042)
- City of Denham Springs (LAR041020)
- City of Gonzales (LAR041035)
- City of Hammond (LAR041030)
- City of Mandeville (LAR041008)
- City of Monroe (LAR041010)
- Iberia Parish (LAR041045)
- Lafayette Consolidated Government (LAR041025)

- Lafourche Parish (LAR041031)
- LDOTD (LAR043001)
- Ouachita Parish Police Jury (LAR041018)
- Plaquemines Parish Government (LAR041022)
- City of Port Allen (LAR041012)
- Rapides Parish (LAR041044)
- St. Charles Parish Government (LAR041032)
- St. John the Baptist Parish (LAR041047)
- St. Tammany Parish Government (LAR041024)
- United States Air Force Barksdale Air Force Base (LAR042001)
- United States Army Joint Readiness Training Center & Fort Polk (LAR042002)
- City of Zachary (LAR041053)



Small MS4 Permits Currently at (or Scheduled for) Public Notice

- Total = 6
- Calcasieu Parish Police Jury (LAR041019)
- City of Natchitoches (LAR041029)
- City of Pineville (LAR041007)
- Plaquemines Parish (LAR041022)
- Town of Pearl River (LAR041033)
- City of Walker (LAR041004)

*Terrebonne Parish Consolidated Government (LAR041023) came off PN 1/22/20



Small MS4s and LDEQ Review of MS4 Annual Reports

- Required by Part IV, Section C of LAR040000 (Due March 10; preceding calendar year, January 1 – December 31)
- LDEQ Water Permits staff review all MS4 Annual Reports
- Common Deficiencies:
 - Target audience not identified
 - Lack of identification of responsible party for implementing each Minimum Control Measure (MCM)
 - Lack of documentation (i.e. copies of pamphlets, handouts, flyers, sign-in sheets, pictures of events, etc.)
 - TMDL/WLAs not addressed
 - Timeline/implementation for future goals not included



LDEQ's First MS4 Conference

October 23 - 24, 2019



October 23-24, 2019 LDEQ Conference Center – LDEQ Headquarters 602 North Fifth Street, Baton Rouge, LA 70802



LDEQ MS4 Conference Highlights

- 126 attendees
- Chose 3 Notable Small MS4 Programs to give an overview; selected an airport, military base, and a city (population ~ 10,000)
- Presentations that received the best feedback:
 - Identifying Funding Resources for Your MS4
 - City of Gonzales's Public Education/Involvement
 - TMDL Studies/Modeling
 - Construction Management
- Breakout Sessions in the afternoon
- Program Conference presentations can be downloaded at: <u>https://www.deq.louisiana.gov/page/storm-water-protection</u>



LDEQ MS4 Conference Highlights

Assigned Group Activity: Discussion of Big Challenges & Successes

No LDEQ Inspectors or Permitting Staff allowed during discussion!





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