



MS4- PHASE II

WHAT TO EXPECT WHEN YOU'RE INSPECTED

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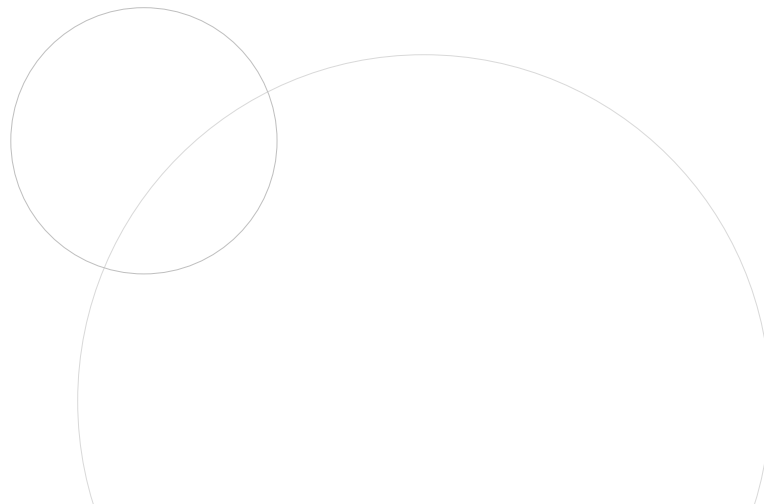




What's The Point of All This?

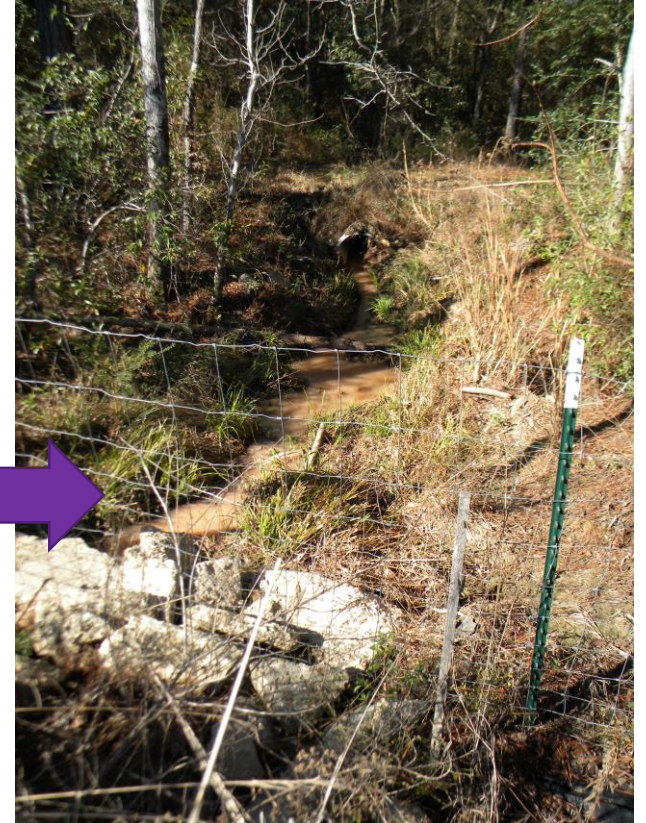
“EPA’s Stormwater Phase II Rule establishes an MS4 stormwater management program that is intended to improve the Nation’s waterways by reducing the quantity of pollutants that stormwater picks up and carries into storm sewer systems during storm events.

Common pollutants include oil and grease from roadways, pesticides from lawns, sediment from construction sites, and carelessly discarded trash, such as cigarette butts, paper wrappers, and plastic bottles. When deposited into nearby waterways through MS4 discharges, **these pollutants can impair the waterways, thereby discouraging recreational use of the resource, contaminating drinking water supplies, and interfering with the habitat for fish, other aquatic organisms, and wildlife.”**





WHY THESE PROGRAMS MATTER





INITIAL NOTIFICATION & SELF-ASSESSMENTS



- EPA determines the facilities that need to be inspected, LDEQ divvies the list to inspectors
- LDEQ inspectors will make initial contact and provide 30 days to complete self-assessments
- After self-assessments are completed, an in-person meeting will be scheduled to discuss the responses/findings

SELF-ASSESSMENTS

- Self –assessment checklists are the current {imperfect} method used to determine MS4 program progress
- Components (or modules) selected at random or based on what has already been evaluated previously
- Six components:
 - Construction
 - Illicit Discharge Detection & Elimination
 - Good Housekeeping
 - Post-Construction
 - Public Education & Outreach
 - Public Involvement & Participation





RECORDS REVIEW

During the 30 day self-assessment window, LDEQ inspectors will read the following documents, if available for review:

- Annual reports
- SWMP
- Sample results, if applicable
- Any other relevant files submitted by the facility to EDMS, including past Enforcement history



MAIN OBJECTIVE: DETERMINE HOW EFFECTIVE YOUR PROGRAM IS





SELF-ASSESSMENT REVIEW

- LDEQ inspectors will read and evaluate responses
- What are we looking for?
 - Quantifiable results-HOW are you showing your compliance with the program?
 - Details, details, details
 - Effort? Budget? Staff?
 - How well do you know your constituent base?
 - Is it effective?





PROGRAM ASSESSMENT

In-Person Meeting



What to expect:

- Question and answer session about the documentation
- Cannot tell you exactly how to run the program because it's tailored to your specific needs
- However, we will ask why certain things are (or aren't) being done, will challenge you to evaluate ways to improve it
- Comparison to last inspection
 - Have improvements been made?
 - Is current administration on board?
- You may already be doing things & you don't realize it
- Deficiencies will be noted in inspection report
- May request additional information or documentation
- At present, enforcement is handled via evaluations by PSSD
- Once the inspection is complete, reports are then supervisor reviewed and submitted to EDMS as public record

SELF-ASSESSMENT ISSUES

- Extremely Subjective
- Certain level of trust
- Questions not always applicable
- Need data and documentation as proof, which can be difficult to obtain





Communication & Program Partnership

- We rely on MS4 permittees to be the boots on the ground
 - Sometimes we will contact permittees about citizen complaints that can be regulated under MS4 programs
- Ordinances, fines, and other local level enforcement are the first lines of defense
- If an issue persists or assistance is needed, LDEQ can respond via the citizen complaint system



CITY OF NEW ORLEANS





PARTNERSHIP IS KEY





THANK YOU

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