

# Large MS4s – Phase I Ms4 Inspections

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# Agenda

1. General Information
2. Inspection Purpose & Approach
3. Phase I Stormwater Minimum Control Measures to Inspect
4. Inspection Process
5. Common MS4-SA Questions Discussed During Inspections
6. Summary & Photos



# General Information

- There are two (2) Large MS4s in Southeast Louisiana:  
Jefferson Parish MS4 & Orleans Parish MS4
- There are twelve (12) sMS4s in Southeast Louisiana
- LMS4s are listed as Water Majors (Individual Permit)
- SMS4s are listed as Significant Minors (General Permit)

# General Information

- EPA MS4 Self-assessments are used to assess compliance with MS4 program
- EPA MS4 Self-Assessment Modules were adopted by LDEQ in 2016
- Inspections approach follow the Municipal Stormwater Program Evaluation Guidance by U.S. EPA Office of Wastewater Management-July 2006

# General Information

- LMS4s Inspections (Self-assessment):
  - Are a partial audit of your MS4 program
  - Focus on one or two of the Minimum Control Measures
  - Questions from one MCM may extend to other MCMs
- Field inspections are conducted specially for the Construction Site Runoff

# Inspection Purpose & Approach



# Inspection Purpose

## Purpose of Self-assessments & Meeting

Assess the compliance status of a permittee with its MS4 permit and SWMP Plan

## Purpose of Field Inspections

Assess how inspectors respond to compliance issues

# Inspection Approach

Inspections are announced unlike regular CEIs

LDEQ uses the Self-Assessment checklist modeled after the EPA checklists

Inspectors determine how many/which MCMs will be assessed during the inspection



# **Phase I Stormwater Minimum Control Measures**

## **List of the 14 Minimum Control Measures**



# Phase I Stormwater Minimum Control Measures

1. Structural Controls and Stormwater Collection System Operation
2. Post-construction Stormwater Management in New Development & Significant Redevelopment
3. Roadways
4. Flood Control Projects
5. Pesticide, Herbicide, & Fertilizer Application

# Phase I Stormwater Minimum Control Measures

6. Illicit Discharges & Improper Disposal
7. Spill Prevention & Response
8. Industrial & High Risk Runoff
9. Construction Site Runoff
10. Public Education and Outreach/Public Involvement & Participation on Stormwater Impacts

# Phase I Stormwater Minimum Control Measures

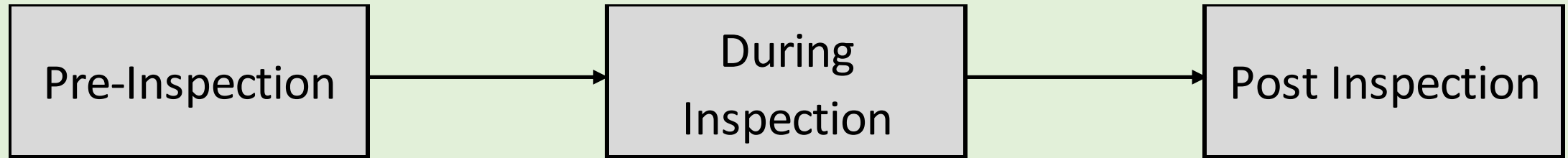
11. Monitoring Programs

12. Pollution prevention/Good Housekeeping for Municipal  
Operations

13. Measurable Goals

14. Green Infrastructure/Low Impact Development

# Inspection Process



# Inspection Process



## LDEQ Inspector – Pre-Inspection

- Review EDMS documents including permit and/or permit application, most recent annual Report & most recent SWMP
- Gather contact information
- Determine which component (s) will be assessed
- Email self-assessment checklists to Permittee (s) and/or co-permittees

# Inspection Process



## LDEQ Inspector – Pre-Inspection

Note:

- LDEQ guidelines suggest 30 days from electronic receipt of the email to complete and return the Self-Assessment to the LDEQ
- Review Self-assessment checklists after returned
- Set up a meeting with permittees to discuss self-assessments

# Inspection Process

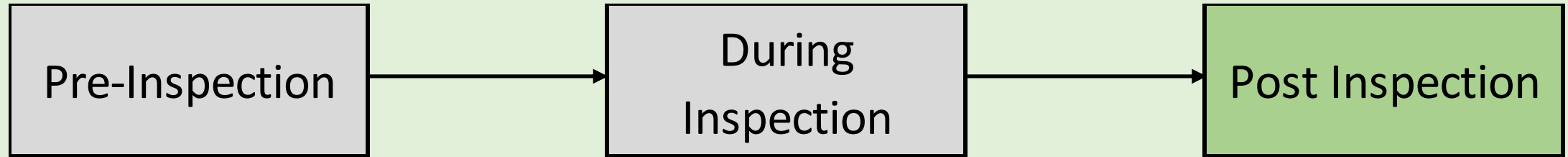


## DEQ Inspector – During Inspection

- Meet with facility representatives
- Go over self-assessment checklist (s)
- Conduct a field inspection or a facility tour if needed
- Write a Field Interview Form (FIF)



# Inspection Process



## DEQ Inspector – Post Inspection

- Complete a final report at the regional office, send it to EDMS
- Refer deficiencies, if found, to Enforcement Division

# Deeper Look at the Inspection Meeting



# Common MS4-SA

## Questions Discussed During Inspections

- Has the permittee developed a Storm Water Management Program (SWMP), that describes how the Control Measures will be implemented? In accordance with 40 CFR § 122.26 and LAC 33:IX.2511.D [Phase I]
- What pollutants of concern are targeted for reduction through the specific program?
- Which co-permittee(s) and or interagency departments participate in the implementation of program?
- What departments are involved in the program assessment?

# Common MS4-SA

## Questions Discussed During Inspections

- Does the permittee have legal authority to require implementation of the program?
- What ordinances, codes, or policies provide this legal authority?
- What is the budget for the implementation of the program?
- What are the Measurable Goals for the program?
- Are inspectors trained?
- Does the permittee provide training?
- Has the permittee identified its universe?

# Common MS4-SA

## Questions Discussed During Inspections

- Are inspections conducted?
- Does the permittee have a database in place to track the activities of the program?
- Does the permittee assess the effectiveness of the program?
- Who is responsible for carrying out the program?
- Does the permittee generate an assessment report of the program for its records?

# Summary

LMS4 inspections are conducted every other year

Inspection process involves full collaboration & cooperation between the LDEQ inspectors & the Permittees

The inspection process includes preparation prior to inspection, review of the information gathered, a meeting with permittees, potential field inspection, and the completion of the final report

# Photos



# Green Infrastructure





# Green Infrastructure



**Thank you**

**Geaux Tigers!!!**

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