

Sewerage & Water Board of New Orleans



Phase I Permitting /Reporting Issues

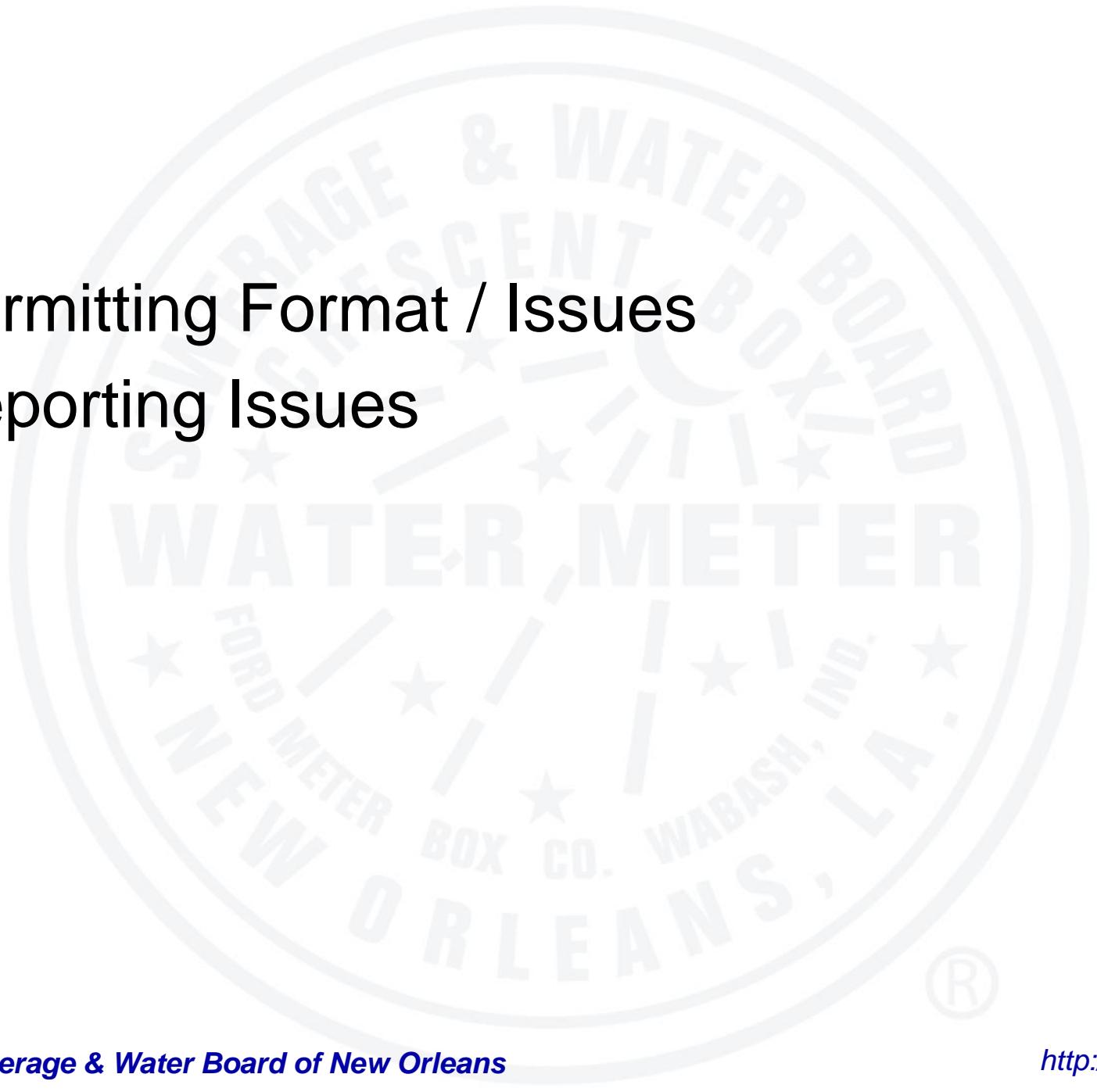
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- Permitting Format / Issues
- Reporting Issues



Permit Renewal

- Application
- LAC 33:IX.2511.D.1 – Part 1
- a. General Information (Who is your mama)
- b. Legal Authority (Who gives you the right)
- c. Source Identification
- (NPDES sites)/ Pump Stations
- (Topographic maps)



Permit Renewal

- Land Use – Topographic maps identifying land use activities
- Population density/Runoff coefficients for each land use
- **d. Discharge Characterization**
- Monthly precipitation data
- Monitoring is conducted at five representative sites/ With Sampling- Grab and composite samples/Also TMDL monitoring(List all sites)



Permit Renewal

- List all water bodies (Subsegment) that receive discharges.
- Field Screening-Characterization Plan
- e. Management Programs:
- Stormwater Management Program (SWMP) Annual Report



Permit Renewal

- Pollutant Control (Structural controls) remove floatables and other large debris
- Pollution from pesticide, herbicide and fertilizer
- Spill Prevention and Response
- Post-construction controls



Permit Renewal

- The public education program addresses illicit discharges, proper management of vehicle fluids and household wastes, and the proper use, application and disposal of pesticide, herbicides and fertilizers



Permit Renewal

- Illicit Connections/Discharges
- **f. Fiscal Resources** /summarizes the budgets
- **LAC 33:IX.2511.D.2 – Part 2**
- a. Adequate Legal Authority
- b. Source Identification



Permit Renewal

- c. Characterization Data
- d. Proposed Management Program
- e. Assessment of Controls
- f. Fiscal Analysis
- g. There are co-permittees submitting as part of this application



Permit Renewal

- Co-permittees (can be part of the problem)
- They may want to get out of the permit
- They are not up to standards
- Not taking the process seriously
- Always complaining about the lack of funds
- Changes in the requirement to file for Permit Renewal



Reporting Issues

- All Annual reports are sent in hard copy with a DVD in the binder.
- DMR's are all e-filed.(some times access is a problem).
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Reporting Issues

- Per LAC 33:IX.2511.D.2.c.i.(c), LDEQ requires results and documentation of storm water samples assayed for the priority pollutant data from Tables II and III, LAC 33:IX.7107 for the 5 representative outfalls.



Reporting Issues

- *SWBNO does not currently sample for the priority pollutant data from Tables II and III, LAC 33:IX.7107 for the 5 representative outfalls. SWBNO proposes to collect this data within 1 year of the expiration date of the new permit for the next permit renewal window*



Reporting Issues

- *This request is being made due to the length of time which is required to meet this request for this permit renewal. To collect samples for priority pollutant data for the 5 representative outfalls during qualifying rain events would take at least six months.*



Reporting Issues

- *To perform data review for this extensive list of pollutants and to provide data in a manageable data base rather than just submit laboratory reports would take 2-3 months. This information would not be available for submittal to LDEQ until January 2020.*



Reporting Issues

- Baton Rouge,
- Shreveport,
- Jefferson Parish,
- Lake Charles
- Are all Phase I Stormwater MS4,
- Municipal Separate Storm Sewer System



Reporting Issues

- All have received new permits in the past three years
- New Orleans has to be the Guinea Pig???



Sewerage & Water Board of New Orleans



Re-Building the City's Water Systems for the 21st Century