

Wake up and smell the audit

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What is a MS4 audit

And what's the point???



What is an MS4 audit

- Assess the compliance and effectiveness of MS4 programs;
- Develop Phase II MS4 Stormwater management programs (SWMPs);
- Assess pollutants of concern;
- Provide technical assistance.

MS4 Program Evaluation Guidance

**U.S. Environmental Protection Agency Office of
Wastewater Management**

Comments on this guide should be directed to:

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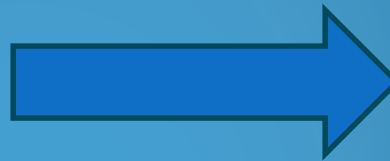
EPA-833-R-07-003

Very technical mumbo...

The purpose of the MS4 program is to determine if the program you (the municipality) are developing (or have already developed) meets the requirements of the MS4 permit and Stormwater program to promote and produce higher water quality of the “waters of the United States” as defined within the meaning of Section 502 of the Clean Water Act, 33 U.S.C. Section 1362, and 40 CFR Section 122.2.

Fancy Definitions

- Audit—comprehensive evaluation of all components of an MS4 program to assess overall implementation and identify problems
- MS4—the municipal separate storm sewer system
- Permittee—the permitted owner/operator(s) of the MS4; the entity being evaluated
- Evaluation—any screening, audit or inspection of an MS4 program
- Evaluator—the NPDES permitting authority staff person who is conducting the evaluation of the MS4 program



What is the difference between an inspection and an audit?

Audit:

Get an overall picture of your MS4 program.

Determine that you're doing what you said you would do when you submitted your Stormwater Management Plan.

All Best Management Practices are reviewed.

Inspections:

Only one or two Best Management Practices are inspected.

Determined by the reason for the inspection; i.e., complaint from a citizen; initiative directive; etc.

Could be a prerequisite for an audit.

Pre-permit reissuance.

So what should I be doing

First of all...

Be Prepared!!!!

How do I prepare

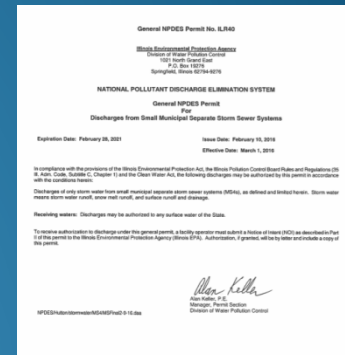
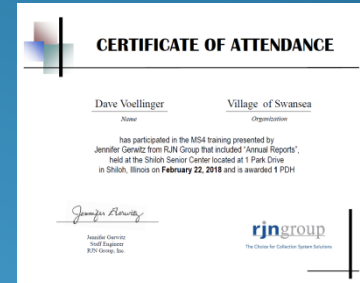
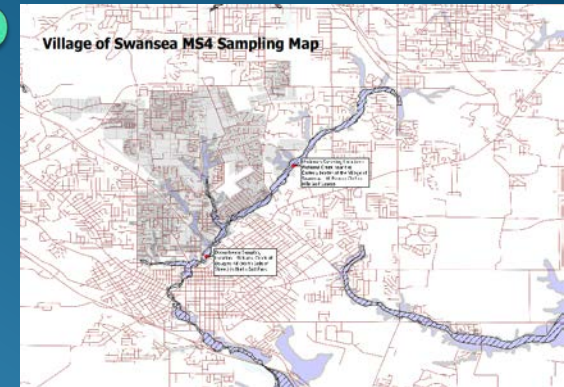
- Review and revise (or create) your MS4 Binder
- Review and revise (or create) an Operations and Maintenance Plan
- Determine what staff is responsible for what tasks
- Do a pre-audit inspection (or two)

What is the MS4 binder and what should be in it?

If you don't have a MS4 binder you must make it NOW!

The binder is your MS4 Bible and it should include:

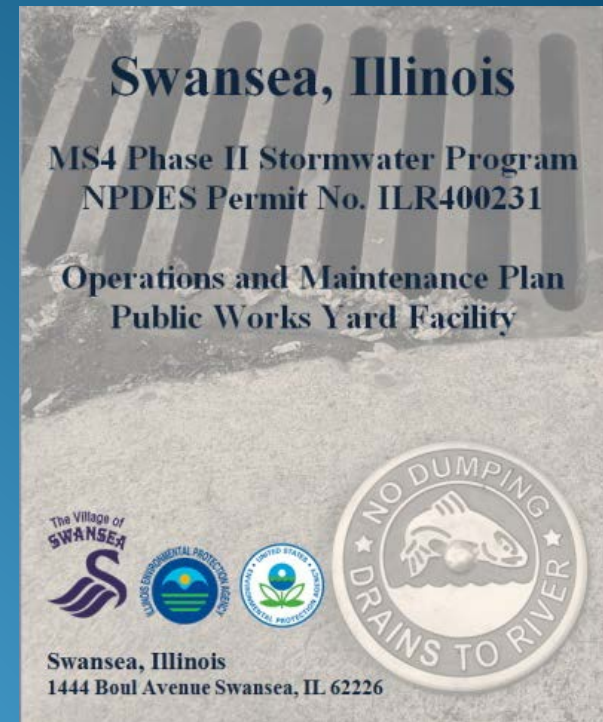
- All of your current and historical MS4 applications.
- All of your annual reports.
- Your Stormwater handouts.
- Your Hotline log, and the files for all complaints.
- The Outfall and Stream Sampling Map(s).
- The Inlet Map.
- The Facilities Map.
- Your municipal Stormwater Operations and Maintenance Plan.
- The names and contact information for all individuals that are part of your MS4 program.
- Training Certificates



What about the O & M Plan

Your Operations and Maintenance Plan should address at a minimum the following:

- Facilities Descriptions
 - Include a detailed sign plan
- Fueling
- Street Sweeping
- Vehicle and equipment maintenance
- Vehicle and equipment painting
- Vehicle and equipment washing
- Utility construction
- Materials loading, unloading, and storage
- Ditch maintenance
- Storage of materials - Indoor and Outdoor
- Waste storage and disposal
- Facilities maintenance and drainage monitoring
- Salt and brine storage
- Lawn maintenance
- Emergency and spill procedures including contact information



What about the O & M Plan Cont.

Your O & M Plan must be reviewed and updated annually as well as immediately if there are changes made to it.

For each component of the O & M Plan you must include a description of the component as well as an overview of the associated best management practices.

Find Potential Violations

Once you are satisfied that your binder is complete go looking for potential physical violations.

Oil Drums

Herbicides

Salt

Fueling Area

Scrap metal

Trash

Tires

Run Off

Paint



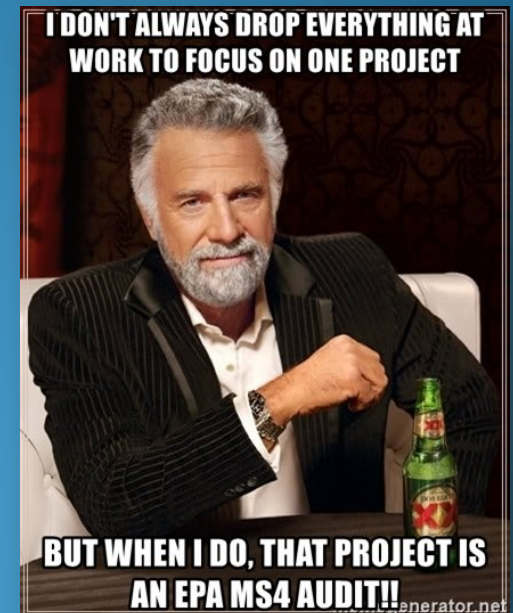
The Call

The EPA will call your municipality and inform you as to the need for an audit. You will may have to coordinate with multiple departments, so do yourself a favor.

1. Figure out which departments need to be involved
2. Talk to those department heads long before you get the EPA call.

After the call

- Drop everything and prepare for your EPA visit
- Make sure you reserve a room big enough to accommodate EPA staff, all involved individuals from the municipality, as well as your MS4 binder (you made that thing right???).
- Do a quick re-inspection of your facilities and review all of the files in your binder.



What to expect

The staff of the EPA will do the following during your audit.

- Review your MS4 permit
 - Ask for a copy of your Stormwater Management Plan
 - Ask for a copy of your latest annual report
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- ❖ The EPA will review your MS4 permit during the audit, so be prepared to answer questions on it.
 - ❖ Know your MS4 binder front and back, it will be your lifeline!
 - ❖ Know your O & M Plan front and back, it will be your other lifeline!

Know the answer to these questions:

- How do you handle citizen complaints?
 - Do you have a Stormwater Hotline???
- How do you track citizen complaints?
- What outreach programs does the municipality do?
- What do your co-permittee's do (if you have any)?
- What departments/staff handle the MS4 program components?
 - Who does your stream sampling?
 - Who oversees your spill prevention and cleanup?
 - Who completes your annual report?
 - Etc.....
- Is your funding source large enough to operate the program?
- Do you have sufficient staff to operate the program?

Know the answer to these questions:

- Where and how are your petroleum products stored?
- Where and how are hazardous chemicals stored?
 - Make sure herbicides and pesticides are stored in the proper locked container
 - Make sure the individuals that use herbicides and pesticides are properly certified, and that no one else has access to those products.
- What the spill prevention plan is and who is responsible?
- What maintenance is performed at your facility?
- What forms of containment does your facility have?
 - If you have an oil water separator make sure its serviced regularly and that you have paperwork to back that up.

After the visit

Don't delay with your response

Give realistic time frames to mitigate violations

Don't lie to the EPA!

Questions???

If you want help with your MS4 program or
have questions later you can email me at
dalley@swanseail.org