

NO DUMPING



For more information
Contact City of Bossier
Storm Water Division
318-213-2157

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DOWN THE DRAIN**



MUNICIPAL STORM WATER SYSTEMS (MS4)

PHASE II (SMALL MS4) ANNUAL REPORT DEFICIENCIES

2019 LDEQ MS4 CONFERENCE
WATER PERMITS DIVISION



MS4 Annual Report

- **Annual Report is required by Part IV, Section C of LAR040000**
- **Annual Report shall include information demonstrating the Permittee's effort in implementing the SWMP, including documentation of BMPs**
- **Reviewed by Water Permits Division, MS4 staff beginning 2017**

Phase II (Small MS4) Remand Rule

EPA placed responsibility on LDEQ to verify that the Permittee's SWMP and annual report shall include clear, specific, and measureable goals and BMPs to ensure that the Permittee reduces pollutants in storm water discharge to the Maximum Extent Practicable (MEP)!

sMS4 Annual Reports requirements



- **Due March 10**
- **Shall include preceding calendar year (Jan 1 – Dec 31)**
- **Send to LDEQ, Water Permits Division**
- **Submit 2 copies (1 for EDMS; 1 for LDEQ staff)**

Annual Reports shall include:

1. The status of compliance with permit conditions, an assessment of best management practices (BMPs) progress toward achieving the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP), and the measurable goals for each of the 6 minimum control measures (MCMs)
2. Results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the program in reducing the discharge of pollutants to the maximum extent practicable;
3. A summary of the storm water activities you plan to undertake during the NEXT reporting cycle, including an implementation schedule;

Annual Reports shall include (continued):

4. Any changes made during the reporting period to your SWMP (changes to any BMPs or any identified measurable goals that apply to the 6 MCMs, including control measures initiated in response to a new wasteload allocation;
5. Notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable) consistent with LAC 33:IX.2525; *and*
6. Any other information requested by the state administrative authority.

Common Deficiencies



- Target audience not identified
- Target pollutant not identified
- Lack of identification of responsible party for implementing each MCM
- Failure to include detailed summary of next year's activities, including implementation schedule
- Lack of documentation (i.e., copies of pamphlets, handouts, flyers, presentations, sign-in sheets, pictures of events, newspaper articles, number of views, etc.)
- TMDL/WLAs not addressed
 - LDEQ included list of applicable TMDLs in first round of Annual Report review
- If your MS4 has a public website, the Annual Report must be published on website.
- Include summary of progress from previous year
- Include timeline/implementation for future goals

Common Deficiencies

BMPs/measurable goals included in the SWMP are not reflected in the annual report.

- Annual reports must correspond directly to the SWMP.
- If a BMP is replaced, the MS4 shall provide a description of the replacement BMPs and update the SWMP. Are these BMPs ineffective or unfeasible? Identify why the BMP is ineffective or unfeasible, expectations of the effectiveness of the replacement BMP, and an analysis of why the replacement BMP is expected to achieve the goals of the replaced BMP.
- Changes adding components to the annual report are acceptable;

Examples of what to report in Annual Report for each MCM



MCM 1

Public Education & Outreach

- Target audience (i.e., public, homeowners, business owners, contractors, school, etc.)
- Provide information on any education outreach program
 - Date of any events, frequency
 - Number of fliers, pamphlets distributed
 - Location of pamphlets/fliers, outreach material (ie. school, govt buildings, rest stops, etc.)
 - Type of media used
 - Date of mail-outs, number of mail-outs distributed, frequency
 - Documentation/copy of outreach material



MCM 2

Public Involvement & Participation

- Target audience
- Provide information on any public hearings/meetings
 - Include documentation (i.e., sign-in sheet, public notice, date, number of participants, agenda, etc.)
- Date of community service, HHW event, Trash Bash, Storm Drain Art/ Stenciling, tree planting event, etc.
- number of volunteers, volume of material collected, number of trees planted, flyer/proof of advertisement, pictures, etc.



MCM 3

Illicit Discharge, Detection, & Elimination

Storm Sewer Map

- % completion

Number of issues, inspections, complaints, violations, SSO

- Follow-up actions

Dry/wet weather sampling

- Follow-up actions
- How the MS4 will inform public employees, businesses, and the public of hazards associated with illegal discharges and improper disposal of waste.
- Inspection logs

Any changes to ordinances (assessment)

Priority area updates



MCM 4

Construction Site Storm Water Runoff Control

Number of construction activities

- Number of SWPPP reviewed
- Number of inspections
- Number of violations, complaints, or any stop orders
 - Inspection logs
 - Inspection report

Any changes to ordinances



MCM 5

Post-construction Storm Water Management in New Development & Redevelopment

- Post- construction site inspections, violations, corrections (runoff control)
- Any changes to ordinances
- Identify implementation strategies, operation and maintenance policies, and enforcement procedures
- How is the program tailored for your local community (tree plantings, green infrastructure)
- Assessment of existing ordinances, policies, programs, and studies addressing storm water runoff quality for program development and provision of opportunities for public participation

Examples of MCM 5, Post Construction BMP Examples

Structural

- Rain gardens
- Wet ponds
- Grassed swales

And non structural BMPs

- Long term- homeowners association agreements with city on pond upkeep
- Ordinances

Green infrastructure/ low impact development (LID)

- Incentives to install/ plan for it
- Discount/credit program
- Recognition program

Most in it for the money- recognition may increase price of lots in neighborhood

MCM 6

Pollution Prevention/Good Housekeeping for Municipal Operations

- Employee training
 - Number, dates, training records
- List of MSGP permit, update as needed
- Street sweeping
 - Volume of material collected
 - Waste pick up clean up
 - Volume of material collected
 - Culverts and ditches cleanup
 - volume of material collected



Recommendations

- Include ordinance number or excerpts of specific storm water ordinance. No need to submit ENTIRE ordinance
- No need to submit documentation OF EVERY single item (may submit link)
- If document was submitted with SWMP, reference SWMP
- Do not submit copy of permit
- Include timeline, implementation schedule
- Include summary of progress



Checklist

Checklist has been updated to better reflect the annual report BMP requirements

- removed items applicable to SWMP
- added/changed the following:

MCM 3

- Water body Map
- Illicit discharges procedures
- Inform public illegal discharges/disposals



Checklist

Checklist has been updated to better reflect the annual report requirements

MCM 4

- SWPPP review
- Ordinance review escalation enforcement action to correct non-compliance

MCM 5

- O&M of BMPs for runoff control from new/redevelopment

MCM 6

- Any reported MS4 enforcement

E-reporting



40 CFR 127.16, Table 1

TABLE 1 - START DATES FOR ELECTRONIC SUBMISSIONS OF NPDES INFORMATION

NPDES information	Start dates for electronic submissions
General Permit Reports [Notices of Intent to discharge (NOIs); Notices of Termination (NOTs); No Exposure Certifications (NOEs); Low Erosivity Waivers (LEWs) and other Waivers] [40 CFR 122.26(b)(15), 122.28 and 122.64]	December 21, 2020.
Discharge Monitoring Reports [40 CFR 122.41(l)(4)]	December 21, 2016.
Biosolids Annual Program Reports [40 CFR part 503]	December 21, 2016 (when the Regional Administrator is the Director).
	December 21, 2020 (when the state, tribe or territory is the authorized NPDES program).
Concentrated Animal Feeding Operation (CAFO) Annual Program Reports [40 CFR 122.43(c)(4)]	December 21, 2020.
Municipal Separate Storm Sewer System (MS4) Program Reports [40 CFR 122.34(g)(3) and 122.42(c)]	December 21, 2020.
POTW Pretreatment Program Annual Reports [40 CFR 403.12(i)]	December 21, 2020.
Significant Industrial User Compliance Reports in Municipalities Without Approved Pretreatment Programs [40 CFR 403.12(e) and (h)]	December 21, 2020.
Sewer Overflow Event Reports [40 CFR 122.41(l)(6) and (7)]	December 21, 2020.
CWA 316(b) Annual Reports [40 CFR part 125, subparts I, J, and N]	December 21, 2020.



E-reporting

- Presently, EPA is not yet requiring electronic submittals of MS4 Annual Reports. IF LDEQ is required to adopt the eReporting rule for the Annual Reports, permittees will be notified via mail
- E-reporting is currently required for individual large/medium MS4 permits (eDMR) for pollutants

Current Review Status

- Planning MS4 Conference!
- Wrapping up MS4 NOIs!
- Currently reviewing MS4 2017 Annual Reports
- Permittees will receive letter with updated checklist once review is complete





Contact Information

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