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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**ENVIROSCCHOOL**

# Overview of MS4 Programs

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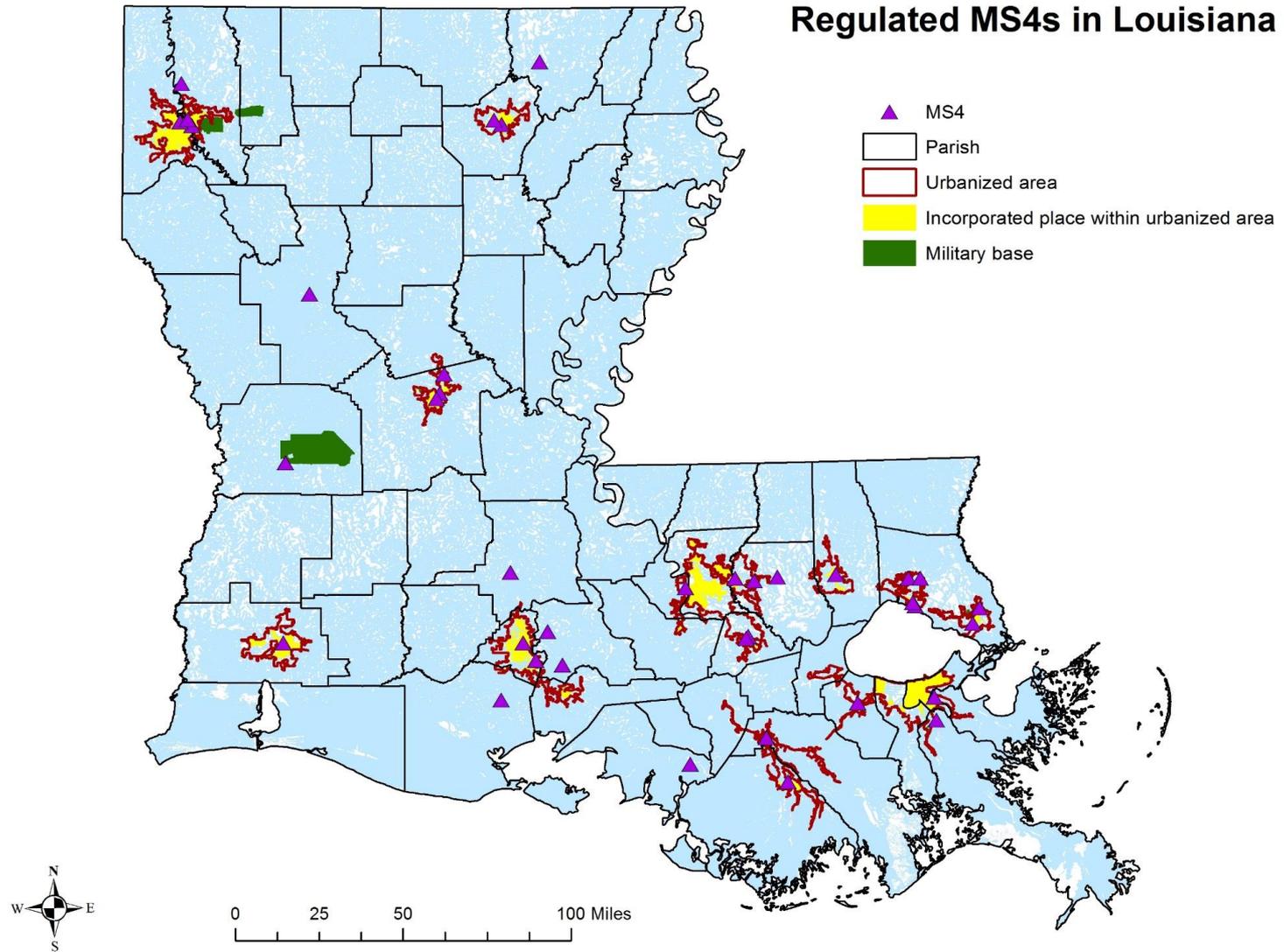
# What is an MS4?

## Municipal Separate Storm Sewer System



- A conveyance or system of conveyances
  - Designed or used to collect/convey storm water (i.e., roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains)
  - owned by a state, city, town, village, parish/county, or other public entity that discharges to waters of the U.S.
  - NOT a combined sewer
  - NOT part of a sewage treatment plant
  - or POTW
- Regulations:  
LAC 33:IX.2511.B and 40 CFR 122.26(b)(8)
- Urban storm water is a major source of pollutants that contribute to water quality impairments

## Regulated MS4s in Louisiana



# Types of MS4s

- **Phase II - Small MS4s**

- Per US Census, municipality within an Urbanized Area (UA)
- Includes towns, cities, parishes, military bases, and LDEQ-designated areas
- General Permit LAR040000
- 47

- **Phase I - Medium and Large MS4s**

- Medium: population of 100,000 – 250,000
- Large: population of over 250,000
  - Located in the parishes listed in LAC 33:IX.7115 Appendix H
- Includes cities, parishes, military bases, and LDEQ-designated areas
- Individual NPDES Permit
- 4

# Types of MS4s

- **Traditional MS4s**
  - Municipalities (i.e., towns, cities, Parishes, etc.)
- **Non-traditional MS4s**
  - Federal facilities, military bases
  - Department of Transportation
  - Airports
  - Universities
- **Co-permittees**
  - Shared cooperative/interagency agreement
  - Mix of traditional and non-traditional MS4s
  - All Phase I - MS4 permits
  - 3 Phase II – Small MS4 Permits



# Phase II – Small MS4s

- Not a medium or large MS4
- Per US Census, located in Urbanized Area (UA)
- Outside UAs, populations 10,000 – 50,000
  - Population density of 1,000 per square mile
  - LDEQ may designate areas outside urbanized area due to water quality, ONRW, etc.
- 2010 US Census Reference Map
  - <https://www.census.gov/geographies/reference-maps/2010/geo/2010-census-tract-maps.html>
- 2020 Census may require additional municipalities to obtain coverage

# List of Permitted Small MS4s

NON-TRADITIONAL	TOWNS	CITIES	PARISHES
LADOTD	Town of Abita Springs	City of Abbeville	Ascension Parish Government
Barksdale Air Force Base	Town of Pearl River	City of Alexandria	Bossier Parish Police Jury
Fort Polk		City of Bastrop	Caddo Parish
		City of Bossier City	Calcasieu Parish Police Jury*
		City of Baker	Iberia Parish*
		City of Breaux Bridge	Lafayette Consolidated Government*
		City of Broussard	Lafourche Parish Government
		City of Covington	Livingston Parish Government
		City of Crowley	Ouachita Parish Police Jury
		City of Denham Springs	Plaquemines Parish Government
		City of Gonzales	Rapides Parish
		City of Hammond	St. Bernard Parish Government
		City of Mandeville	St. Charles Parish Government
		City of Monroe	St. John the Baptist Government
		City of Morgan City	St. Tammany Parish
		City of Natchitoches	Tangipahoa Parish Government
		City of Pineville	Terrebonne Parish Consolidated Government
		City of Port Allen	
		City of Slidell	
		City of Thibodeaux	
		City of Walker	
		City of Zachary	

\*Co-permittee

# Phase II Small MS4 Co-permittee Agreement

Small MS4	Co-permittees
Calcasieu Parish Police Jury	Calcasieu Parish, City of Lake Charles, City of Sulphur, and City of Westlake
Iberia Parish	City of New Iberia, Village of Loreauville, and Iberia Parish
Lafayette Consolidated Government	City of Carencro, City of Scott, City of Youngsville, Town of Duson, Lafayette Parish, The Lafayette Airport Commission, and University of Louisiana at Lafayette

# Phase I MS4s

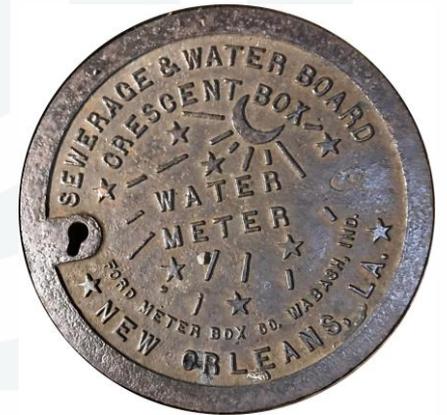
## Medium and Large MS4s

- **Medium MS4 (3)**

- Population of 100,000 – 250,000
- City of Baton Rouge/Parish of East Baton Rouge, Jefferson Parish, City of Shreveport

- **Large MS4 (1)**

- Population 250,000 +
- City of New Orleans



# Phase I MS4s

Medium MS4	Co-permittees
City of Baton Rouge, Parish of East Baton Rouge	City of Central, DOTD District 61, LSU, Southern University
Jefferson Parish	DOTD District 02 (Jefferson Parish only), City of Gretna, City of Harahan, City of Westwego
City of Shreveport	Caddo Levee District, DOTD District 04

Large MS4	Co-permittees
Orleans Parish	City of New Orleans, DOTD District 02 (Orleans Parish only), Lakefront Management Authority, Port of New Orleans, Orleans Levee District-Flood Division, The Sewerage and Water Board of New Orleans



## Phase II - Small MS4s



**NO DUMPING**



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

**ONLY RAIN  
DOWN THE DRAIN**



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# Small MS4 Permitting Process

- NOI for Small MS4 General Permit
- Review SWMP
- Public Notice 30 days
- Issue Notice of Authorization and Checklist
- Current: 41 have been issued, 6 are in progress
- General Permit LAR040000
  - 9/1/2018 - 8/31/2023

# What is a Small MS4 Storm Water Management Plan (SWMP)?

SWMP is a “living” document that describes how the MS4 will reduce the discharge of pollutants from its sewer system

- Addresses the permit requirements, including the 6 Minimum Control Measures (MCMs)
- Includes Best Management Practices (BMPs) and measurable goals
- Identifies any local pollutants, TMDLs, WLA, etc.
- Includes a schedule of future goals and milestones
- *Shall be clear, specific, and measurable!*

# Small MS4 Storm Water Management Plan (SWMP)

## 6 Minimum Control Measures (MCM)

1. Public Education & Outreach Program
2. Public Involvement & Participation
3. Illicit Discharge, Detection, & Elimination
4. Construction Site Storm Water Runoff Control
5. Post-construction Storm Water Management in New Development & Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

# What to Include for All MCMs

- Target audience (i.e., public, homeowners, business owners, contractors, school, commercial/industrial, etc.)
- Target pollutant sources
- Responsible official for each MCM
- Description to evaluate success
- Dates of events/frequency
- Any monitoring data
- Quantifiable data
  - number of flyers/pamphlets distributed, number of webpage views or “Likes,” number of volunteers, number of schools visited, number of construction inspections/complaints, number/% of employees trained, etc.
- *Detailed clear, specific, and measureable BMP and goal!*

# MCM 1 – Public Education and Outreach Program

- Public Education Program
- Plans to distribute educational materials to residents and businesses (i.e., flyers, pamphlets, water bill memos, etc.)
- Outreach strategy
- Household Hazardous Waste Event
- Plans to visit local schools and inform public how to reduce storm water pollution
  - <https://gonzalesla.com/meet-greenie/>
  - <https://www.deq.louisiana.gov/index.cfm?md=pagebuilder&mp=home&pid=storm-water-protection>



# MCM 2 – Public Involvement & Participation

- Hold public hearings or include storm water topics at council meeting
- Plans for volunteer cleanup events
- Public notice SWMP and Annual Reports or publish online



# MCM 3 – Illicit Discharge, Detection, and Elimination

- Illicit Discharge Plan
- Spill Response Plan
  - For any releases of excess reportable quantity, re-evaluate and modify SWMP to prevent recurrence
- Storm Sewer Map
- Conduct visual dry and wet weather screenings/inspections
- Enforceable ordinance or other regulatory mechanism
- Locate priority areas

# MCM 4 – Construction Site Storm Water Runoff Control

- Develop a program to reduce storm water runoff from construction activities
- Enforceable ordinance or other regulatory mechanism
- Requirements for construction site operators to
  - implement erosion and sediment control BMPs
  - control waste (i.e., building materials, concrete truck washout, etc.)
- Site plan/SWPPP review
- Inspection
- Educational and training measures



# MCM 5 – Post-construction Storm Water Management in New Development and Redevelopment

- Program to address storm water runoff
- Minimize water quality impacts
- Non-structural BMPs
- Structural BMPs
- Ensure long-term operation and maintenance (O&M) of BMPs
- Enforceable ordinance or other regulatory mechanism

# MCM 6 – Pollution Prevention and Good Housekeeping for Municipal Operations

- Operation & Maintenance (O&M) Program
  - Reduce runoff from municipal operations
  - Maintenance activities
  - Reduce discharge from public roadways, parking lots, storage areas, maintenance shops, etc.
  - Proper disposal of MS4 waste (dredged soil, sediment, debris, etc.)
  - Flood management projects
- List of LPDES Permits that discharge storm water
- Government Employee Training Program
  - See EPA link



# Total Maximum Daily Loads (TMDLS)

- Identify subsegments and TMDLS/WLAs
  - Louisiana Water Quality Integrated Report (IR)
- The MS4 must develop clear, specific, and measurable goals and BMPs in their SWMP targeting pollutants of concern within 6 months of assignment of any new WLA (waste load allocation) for specific pollutants identified as impairments attributed to discharges from regulated MS4s.
- IRC4a - TMDL with a WLA assigned to the MS4
- IRC5 - Source of impairment
  - Site clearance, MS4, construction, urban, residential district, forced drainage, wet weather discharge, sanitary sewer overflow, and rural (residential areas)

# TMDL Monitoring

- If your MS4 discharges to a water with a WLA for a particular pollutant, you are required to develop and implement a monitoring program.
- The SWMP must describe how the chosen BMPs and other selected control measures will reduce the discharge of the pollutant(s) of concern.
- Progress on these BMPs should be reported in the Annual Reports

# Small MS4 Annual Report

- Annual Report is required by Part IV, Section C of LAR040000
- *It shall include information demonstrating the Permittee's effort in implementing the SWMP, including documentation of BMPs*
- Reviewed by Water Permits Division
- **Due March 10**
  - May submit addendum
- Shall include preceding calendar year
  - January 1 – December 31
- **Send to LDEQ, OES - Water Permits Division**
  - Submit 2 copies (1 for EDMS; 1 for LDEQ staff)



# Small MS4 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 any monitoring data
3. A summary of the storm water activities for NEXT reporting year, (including an implementation schedule);

# Annual Reports shall include (continued):

4. Any changes made during the reporting period to your SWMP;
5. Notice that you are relying on another government entity for any other permit obligations (if applicable); *and*
6. Any other information requested by LDEQ

# Most Requested Information for All MCMS for Small MS4 Annual Report

- 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 webpage views, copy of employee training, etc.)

# Most Requested Information for All MCMS for Small MS4 Annual Report

- TMDLs/WLAs not addressed
- If your MS4 has a public website, the Annual Report must be published on website.
- Include summary of progress
- Evaluate success/failure of MCM
- Include timeline/implementation for future goals

# Most Requested Information for All MCMS for Small MS4 Annual Report

- 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
  - Changes adding components to the annual report are acceptable

# Annual Report: MCM 1 – Public Education and Outreach Program

- Target audience (i.e., public, homeowners, business owners, contractors, school, etc.)
- Target pollutant
- Provide information on any education outreach program
- Date of any events, frequency
- Number of flyers, pamphlets distributed
- Location of pamphlets/flyers, 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

# Annual Report: MCM 1 – Public Education and Outreach Program

I.	CLASSROOM EDUCATION ON STORMWATER
MCM	Educational field trips, in-school presentations, summer camp, adult tours
	<b>DESCRIPTION &amp; IMPLEMENTATION</b>
	<b>FIELD TRIPS:</b> Topics include Water We Use: Drinking Water and Wastewater, Water Bugs, Exploring Water Properties, Fit for a Bug - Macro-Invertebrates as Water Quality Indicators, Wetlands: A Treasure Worth Saving, Water Bugs and Wading Birds, Water: A Precious Resource Above and Below Ground adapted for Grades 2- 12
	<b>IN SCHOOL PRESENTATIONS:</b> Topics include What Happens to Storm Water after a Rain, Tackle Trash: Recycling, Animal Adaptations, Marine Debris, Water as a Universal Solvent, Water quality testing
	<b>SUMMER CAMP:</b> Minimum of two (2) five-day day camps for grades 4-6 with various water related activities,
	<b>ADULT TOURS:</b> Topics from above presentations are adapted for an adult audience, typically including a riding tour of the constructed wetlands and wastewater treatment facility
	<b>MEASURABLE GOAL/DETAILED DESCRIPTION</b>
	2019 <b>FIELD TRIPS:</b> 7 SchoolField trips for 15 classes, 276 students, 14 teachers, 42 adults
	2019 <b>IN SCHOOL PRESENTATIONS:</b> 27 presentations for 64 classes, 1326 students, 55 teachers, 8 adults
	<b>SUMMER CAMP:</b> 81 students, 2 camp sessions
	<b>ADULT TOURS:</b> 0 tour, 0 adults
	<b>MILESTONE</b> Providing education on environmental stewardship - increased participation in learning environmental stewardship - practicing environmental stewardship
	<b>% PROGRESS/COMPLETION</b>
	There was a 44% increase in school presentations, 48% increase in field trips , 40% increase in summer camp attendance, 100% decrease in adult tours
	<b>HOW LONG WITH PROGRAM BE IMPLEMENTED?</b>
	This program is in current budget and will be recommended for indefinite future budgets

# Annual Report: MCM 2 – Public Involvement & Participation

- Target audience
- Target pollutant
- 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.



# Annual Report: MCM 2 – Public Involvement & Participation

## MCM 2: Public Involvement/ Participation

- 4. Volunteer Monitoring:** The “Keep ██████ Beautiful” organization had 2 citywide cleanup days taking place on April 6 and November 2. Flyers for the events are included in Appendix B. Overall, a total of 707 people participated in the cleanup events. The volunteers collected 2,230 pounds of trash. The success of this BMP is evaluated based on the large amount of participation, which consistently happens every year. In addition, the ██████ City Court Judge sentences everyone community service. Half of their 32 hours must be done with ██████ litter pickup. ██████ offers community service five days a week and every other Saturday. In 2019, ██████ had 136 workers with a total of 2,921 hours.



# Annual Report: MCM 3 – Illicit Discharge, Detection, & Elimination

- Storm Sewer Map ( % completed)
- Overview of subsegments and TMDLs and WLAs
- Any monitoring data
- 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

# Annual Report: MCM 3 – Illicit Discharge, Detection, & Elimination

## A.2. Minimum Control Measures (Quantified Results)

Minimum Control Measure	BMP	Measurable Goal	Quantifiable Results	Comments
Illicit Discharge Detection & Elimination	<u>Pollution Source Tracking Program</u> ; Inspections of individual on-site sewer systems.	Department of Health & Human Services and Department of Environmental Services water quality improvement project.	170 septic systems were replaced with compliant ATUs. Some qualified households are on a waiting list for additional funding.	Grant funding for low to moderate income households provided by HUD/CBDG grants.
Illicit Discharge Detection & Elimination	<u>Pollution Source Tracking Program</u> ; Inspections of individual on-site sewer systems	Department of Health & Human Services and Department of Environmental Services water quality improvement project.	22 repairs to ATUs for low income home owners. Repairs range from pump-outs, to electrical service, to replacing aerators, etc.	Grant funding for low to moderate income households provided by HUD/CBDG grants.
Illicit Discharge Detection & Elimination	Camp Salmen Nature Park & Adopt-a-Pond Program	Encourage students to participate in WQ monitoring & sampling, wetlands & watersheds investigations.	540 volunteers from 7 schools performed WQ monitoring and adopted a total of 7 ponds in 6 watersheds.	Students learn to appreciate WQ & the environment become good stewards of WQ and the environment.
Illicit Discharge Detection & Elimination	Maintenance of SW Ponds, wet & dry detention	Complete work orders for pond maintenance.	72 detention ponds were maintained.	Ponds are maintained by Public Works.
Illicit Discharge Detection & Elimination	SW inspections performed on construction sites	Qualified staff to perform inspections on construction sites	2,732 residential & commercial sites had Stormwater - Drainage inspections (minimum 2 inspections per site).	Failed inspections must make corrections & pass a re-inspection. A total of 702 re-inspections took place.



# Annual Report: 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



# Annual Report: MCM 4 – Construction Site Storm Water Runoff Control

**BMP: Commercial and subdivision reviews are performed in the permitting and approval process of all new construction**

**Measurable Goal:** Environmental Quality will review 100% of new construction plans to address environmental concerns. These reviews will begin on day one, and continue throughout the five-year permit period.

**Responsible Department:** EQ Regulatory Compliance

**Compliance Status:** Satisfactory

**2019 Results:** Environmental Quality Division reviewed a total of 101 development plans for storm water concerns. Before the development is approved by LCG, an applicant must submit the necessary documents, including the SWPPP and NOI.

**Goals for 2020:** Environmental Quality will continue to review 100% of new commercial and subdivision construction plans. A certification statement and SWPPP for any site over an acre will be required before a commercial building permit will be issued.

**BMP: will inspect construction sites for runoff controls**

**Measurable Goal:** will have staff to inspect commercial construction sites.

**Responsible Department:** EQ Regulatory Compliance

**Compliance Status:** Satisfactory

**2019 Results:** EQ's two Engineering Aides III performed 2,386 site inspections; this includes initial inspection and follow up inspections of commercial sites, individual residential, and subdivisions. If storm water violations are present, BMPs are suggested to correct the problem and informational pamphlets are distributed.

- 45 inspection forms mailed
- 18 Notices of Non-Compliance issued
- 16 inspections blocked
- 1 Cease and Desist order issued
- 40 commercial CO inspections

**Goals for 2020:** Our two inspectors will continue to visit construction sites to address violations and enforce Ordinance No. O-237-2007, § 2, 10-16-07.

**BMP: EQ will ensure all projects obtain and comply with all applicable LDEQ and USACOE permits**

**Measurable Goal:** EQ will ensure 100% of all construction projects obtain proper permit requirements beginning on day one of the Phase II permit period and continue throughout the five-year permit period.

**Responsible Department:** EQ Regulatory Compliance; CID

**Compliance Status:** Satisfactory

# Annual Report: MCM 5 – Post-construction Storm Water Management in New Development and 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

# Annual Report: MCM 5 – Post-construction Storm Water Management in New Development and Redevelopment

## A.2. Minimum Control Measures (Quantified Results)

Minimum Control Measure	BMP	Measurable Goal	Quantifiable Results	Comments
Post Construction Stormwater Controls	Parish maintained ponds are assessed for SW retrofits.	Improved WQ and removal efficiencies on STP ponds.	72 ponds were assessed for SW retrofits to improve SW effluent discharges.	Vegetation reduces & filters stormwater to improve WQ.
Post Construction Stormwater Controls	Retention requirements for subdivisions & commercial sites	Required 25% SW reduction in all large developments.	42 subdivisions, 73 minor subdivisions, & 8 right of way projects.	Subdivision retention & detention ponds provide stormwater storage, settling and polishing of pollutants.
Post Construction Stormwater Controls	Pond installation controls	Pond permits are issued with requirements for detention, buffer, requirements, fill, etc.	5 Pond permits were issued by Planning & Development.	Ponds provide stormwater retention which provides settling for pollutants prior to discharge.
Post Construction Stormwater Controls	Land clearing controls	Land clearing permits are issued with buffer and stormwater requirements.	92 land clearing permits were issued by Planning & Development.	No-cut buffers and SW controls prevents water quality degradation.
Post Construction Stormwater Controls	Site work controls	Site work permits improve oversight of grading, excavation, flatwork, drainage infrastructure, etc.	9 site work permits were issued by Planning & Development.	Each Site Work Permit will receive stormwater and water quality review prior to permit issuance.
Post Construction Stormwater Controls	Water Quality Impact Modeling	Model results assist in the selection of post construction controls to protect WQ by meeting TMDLs, WLAs, & preventing WQ degradation.	10 Water Quality Impact Models ran for proposed new projects or developments in STP.	Antidegradation of WQ is prohibited in the STPG SW ordinance. Failed models result in additional BMPs for compliance.



# Annual Report: MCM 6 – Pollution Prevention and 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



# Annual Report: MCM 6 – Pollution Prevention and Good Housekeeping for Municipal Operations

**Responsible Party:** [REDACTED] Environmental Compliance Manager;  
[REDACTED] Director of Public Works

**BMP:** Storm Drain Cleaning

**Measurable Goal:** The City of [REDACTED] will clean debris, such as leaves and trimmings, from 50% of target area drain inlets annually.

**2019 results:** The City cleaned 100% of problem drains in target areas including historically known low areas that flood, high foliage areas, and parade routes. Total collected debris is included in the green debris total under the Landscaping and Lawn Care BMP.

**Goals for 2020:** Continue to clean debris.

**Responsible Party:** Richard [REDACTED] Environmental Compliance Manager;  
[REDACTED] Director of Public Works

**BMP:** Municipal Employee Training and Education Program

**Measurable Goal:** The City of [REDACTED] will conduct annual training in March of each year for select employees within the following departments: Parks, Streets, Public Works, Planning and Wastewater.

**2019 results:** City of [REDACTED] employees attended MS4/SPCC training on December 19th. See Exhibit 8.



# Recommendations

- Do not submit copy of permit
- 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)
- Do not include EVERY inspection report; summarize data into a table
- If document was submitted with SWMP, reference SWMP
- Include timeline, implementation schedule, % completion
- Include summary of progress
- Add supporting documentation to end of submittal as 'Attachments'

# Small MS4 Annual Report Review Process

- Once the Annual Report has been reviewed, LDEQ will submit a complete letter and checklist.
- Currently working on LDEQ Small MS4 Annual Report Template
- **IF unable to complete BMPs**
  - Delays or inability to complete
  - Due to budget cuts, staffing, catastrophic weather events, pandemics, etc.
  - Provide detailed description



# Phase 1 - Medium/Large MS4s



# Phase I – Medium/Large MS4s

- **Permitting Process**
  - Individual NPDES Permit
- **Develop SWMP**
  - Includes Minimum Control Measures (MCMS)
  - Includes pollution prevention measures
  - Treatment or removal techniques
  - Storm water monitoring
  - Enforcement or ordinances or other regulatory mechanisms
  - Other appropriate means to control the quality of storm water discharged

# Phase 1 – Medium/Large MS4s

## Minimum Control Measures

- Structural Controls and Storm Water Collection System Operation
- Post-construction Storm Water Management in New Development and Significant Redevelopment
- Roadways
- Flood Control Projects
- Pesticide, Herbicide, and Fertilizer Application
- Illicit Discharges and Improper Disposal

# Phase 1 – Medium/Large MS4s

## Minimum Control Measures

- Illicit Discharges and Improper Disposal
- Spill Prevention and Response
- Industrial and High Risk Runoff
- Construction Site Runoff
- Public Education and Outreach/Public Involvement and Participation on Storm Water Impacts
- Monitoring Programs
- Pollution Prevention/Good Housekeeping for Municipal Operations

# Phase 1 – Medium/Large MS4s

## Commonly Requested Information by Auditors and Inspectors for Every MCM

- Is there a storm water team in place to ensure that the program is properly implemented? Has the team developed a SWMP that describes how each MCM will be implemented? Are staffing and equipment adequate?
- Describe organizational structure, including staff names, titles, key responsibilities for program implementation; provide org chart.
- List measurable goals and expected quantifiable results; list pollutants of concern targeted for reduction.

# Phase 1 – Medium/Large MS4s

## Commonly Requested Information by Auditors and Inspectors for Every MCM

- Provide standard forms used in program such as checklists, inspection reports
- Training program--provide description and proof, frequency of training, SOPs, notification system for training due dates
- Demonstrate database or tracking system for storm water program; how and by whom is database updated? Who has access?

# Phase 1 – Medium/Large MS4s

## Commonly Requested Information by Auditors and Inspectors for Every MCM

- Does the permittee assess program effectiveness? How is this done? Describe positive results of the program and any proposed changes.
- Provide any formal agreements and key areas of responsibility shared by permittee and/or interagency departments
- Describe meetings and frequency of meetings

# Phase 1 – Medium/Large MS4s

## Commonly Requested Information by Auditors and Inspectors for Every MCM

- Does permittee have legal authority to implement? Provide relevant ordinances, codes, or policies. Which personnel have authority to enforce?
- Budget information
- Procedure for responding to complaints from the public

# E-reporting

- Presently, EPA is not yet requiring electronic submittals of Phase II - Small MS4 Annual Reports. The implementation deadline has been extended to December 21, 2025.
- Once LDEQ is required to adopt the eReporting rule for the Small MS4 Annual Reports, permittees will be notified via mail.
- E-reporting is currently required for individual Phase I - Large/Medium MS4 permits (eDMR) for pollutants.

# Helpful Resources

- 2010 US Census Reference Map  
<https://www.census.gov/geographies/reference-maps/2010/geo/2010-census-tract-maps.html>
- EPA Template for Phase II SWMP  
<https://www.epa.gov/sites/production/files/2019-06/documents/r10-npdes-pocatello-ua-ms4-ids028053-appendix-b1-swmp-template.pdf>
- EPA's MS4 Self-Assessment Modules (Phase I):  
<https://www.epa.gov/tx/municipal-separate-storm-sewer-system-ms4-storm-water-management-program-swmp>
- 2019 LDEQ MS4 Conference  
<https://deq.louisiana.gov/page/storm-water-protection>
- EPA Storm Water and MS4 Online Training/Webinars
  - Storm Water  
<https://www.epa.gov/npdes/npdes-stormwater-webcasts>
  - Green Infrastructure  
<https://www.epa.gov/green-infrastructure/green-infrastructure-webcast-series>
  - Soak Up The Rain  
<https://www.epa.gov/soakuptherain/soak-rain-new-england-webinar-series>



# MS4 Staff Contact Information

Contact	Title	Email	Phone Number
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**Any Questions**



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