

# MS4 Program “How It Affects You”

LDEQ  
Small Business/Small Community  
Assistance Program

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# What is the MS4 Program?

- Municipal Separate Storm Water Sewer System
- A LDEQ permit regulating the storm water runoff from urbanized areas.
- Urbanized area – 10,000 population or more and with a population density of 1000 persons per square mile as determined by census data.

## Phase I Permits (Individual Permit)

- Baton Rouge (LAS000101) – effective 01/01/2005
- Jefferson Parish (LAS000201) – effective 01/01/2001
- New Orleans (LAS000301) – effective 01/01/2001
- Shreveport (LAS000401) – effective 08/28/2003

## Phase II Permits

Approximately 50 small Phase II MS4s in the state

- Baker
- Zachary

# MS4 Permit May Include:

- Federal government (military bases, etc.)
  - State government including DOTD
  - Tribal governments
  - Local governments
  - Other – LDEQ elects to include due to water quality issues
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- DOTD (District 61)
  - Louisiana State University (LSU)
  - Southern University

# Elements of the MS4 Permit

- The MS4 will have a Storm Water Management Plan
- They will have legal authority for storm water activities (ordinances).
  - Zoning – flooding, storm water management
  - Construction
  - Post construction – retention ponds, LIDs.
  - Illicit discharges
  - Litter/Waste Management
- They will do annual reports submitted to LDEQ or EPA.
  - Number of construction plans reviewed, sites visited, enforcement actions, etc.

## Control Measures For Baton Rouge, East Baton Rouge Parish, DOTD, LSU, SU (Phase I Permit)

- Structural Controls and Storm Water Collection System – operate to reduce pollutants
- Areas of New Development and Significant Re-development – “master plan” to reduce pollutants
- Roadways – O & M to reduce pollutants
- Flood Control Projects
- Pesticides, Herbicides, and Fertilizer Application
- Illicit Discharge and Improper Disposal
- Spill Prevention and Response

## Continued

- Industrial and High Risk Runoff
- Construction Site Runoff
- Public Education
- Monitoring Programs
- Pollution Prevention/Good Housekeeping for Municipal Operations

## Six minimum program measures for Phase II Communities: Baker, Zachary

- Illicit discharge detection/elimination
- Public involvement/participation
- Construction site runoff control
- Post construction management in new development and redevelopment
- Pollution prevention/good housekeeping
- Public education and outreach on impacts

# Construction Site Runoff

## Planning and Evaluation

- Department(s) responsible
- Inspection program (both public and MS4 owned sites) – scheduling, prioritization, follow-ups, enforcement, citizen complaints
- Targeted areas
- Identification of MS4 specific controls
- Mechanism to measure BMP effectiveness
- Databases for tracking
- Identification of Pollutants of Concern – “dirt”, etc
- Citizen complaints

# Construction Site Runoff Training

- MS4 Inspector training
- Adequate number of dedicated inspectors
- Compliance Assistance/training for site operators (seminars, meetings, roundtables, etc.)
- Training materials developed by MS4
- Specific outreach for small businesses and minority businesses

# Construction Site Runoff Inventory

- Identification of projects – Number and status, NOI, Mechanism for tracking, inspections/results/follow-up, enforcement action(s), citizen complaints

# Construction Site Runoff Control requirements and BMPs

- Technical guidance used as standards for design/selection of nonstructural and structural BMPs
- Requirements for following tech guidance
- Minimum operation and maintenance requirements
- Installation and maintenance requirements
- MS4-preferred BMPs to be used
- Different BMPs for different seasons

# Construction Site Runoff

## Plan review

- Building permit requirements (i.e., NOI, SWP3, etc.)
- MS4 notification of responsibilities under storm water permitting program
- Requirement to submit SWP3 with project plans
- SWP3 review
- Mechanism for changes to SWP3

# Construction Site Runoff Inspections

- Criteria for prioritizing inspections
- Pre-construction meetings with inspectors and contractors
- Inspections of all phases (i.e., clearing/grubbing/site prep, mass grading/public infrastructure/utility, building construction/final grading)
- Department(s) in charge of erosion and sediment control inspections
- Records management (checklists, inspection form, electronic database)
- Designated inspectors and qualifications

# Construction Site Runoff Enforcement/Referrals

- Addressing non-compliance
- Escalating enforcement
- Follow-up inspections
- Tracking for inspections, enforcement actions, follow-ups, repeat violators

# Post-Construction Planning and Evaluation

- Commercial and residential areas
- Department(s) responsible for implementation
- Inspection criteria
- Enforcement criteria
- Mechanism to determine effectiveness

# Post-Construction Controls

## Maintenance of Structural Controls

- Identification of POCs
- Specific areas targeted for pollutant reduction and application of specific BMPs
- Maintenance scheduling for structural controls (including floatables)
- Procedures to develop, implement and enforce controls from new development and significant re-development after construction

# Structural Control and Collection System Operation

- Department(s) responsible
- Type and number of permanent structural controls in place
- Inspection program (prioritization, maintenance, repairs)
- Contracted services
- Records management (databases, reporting, filing)
- Mechanism to measure and evaluate effectiveness of program
- Quality control of O&M

# New Development and Significant Re-Development

- Department(s) responsible
- Structural controls that work effectively
- Inspection program (prioritization, scheduling, follow-ups)
- Citizen complaints
- Non-complaint operators
- Records management (databases, filing, reports)
- O&M of structural controls owned by Homeowner Associations, commercial facilities, industrial facilities
- Location of new and re-development mapped
- Practice to assure installation of controls and compliance with SWP3
- Mechanism to measure and evaluation effectiveness