



What to Expect When You're Inspected An MS4 Guide to a Positive Experience

Arizona Department of Environmental Quality
Stormwater and General Permits Unit
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- Purpose of MS4 Audit
- Audit Process
- Audit Preparation
- Report of Findings
- Next Steps



- EPA provides grants to help fund ADEQ
- The grant is renewed each year
- Specifies ADEQ conduct 8, Small MS4 audits per fiscal year
- EPA conducts 2, Large/Medium MS4 audits per year
- Arizona's Memorandum of Agreement for NPDES/AZPDES program authority requires ADEQ to "...comprehensively evaluate and assess compliance with schedules, effluent limitations, and other conditions in these permits..." and "Maintain a vigorous program of taking timely and appropriate enforcement actions...."

Gemba – Japanese term that refers to the place where the value is created or where the work is done.

- Annual reports provide a summary of the MS4's program, but does not reveal the work that goes into it.
- The audit process provides an opportunity for ADEQ to experience the MS4's work in action.



When evaluating a program, ADEQ is assessing compliance with permit conditions and the MS4s Stormwater Management Program (SWMP) Plan.



- Determination of compliance and assistance with execution of appropriate enforcement actions
- Stronger coordination and working relationship between the permitting authority and the permittee
- Better understanding by the permittee of the expectations and permit requirements of the permitting authority
- An opportunity to clarify any misunderstandings in the MS4 permit requirements or SWMP Plan
- Improved permitting authority knowledge of the permittee's operations, priorities, constraints and challenges faced when implementing a municipal stormwater program
- A more effective SWMP resulting in better water quality

- Each year, ADEQ selects 8, Small MS4s to be included in the annual audit process.
- They are generally randomly selected, but may include such considerations of potential environmental concern (impaired water, OAW, etc.), contents of annual report...or no annual report
- ADEQ continues to work through the list of existing MS4s to audit.
- Future goal is audit each MS4 at least once within 5-year permit term

- ADEQ’s audit process generally follows U.S. EPA’s MS4 Program Evaluation Guidance document (EPA-833-R-07-003)
- ADEQ recommends MS4s obtain a copy of the EPA document to:
 - use for self audit
 - prepare for ADEQ audit

APPENDIX B – PROGRAM EVALUATION WORKSHEETS

Industrial/Commercial Component Worksheet

Date of Evaluation
Evaluator Name, Title
MS4 Permittee

Instruction: Use this worksheet as a guide for questioning MS4 staff and reviewing applicable documents. Keep in mind that additional questions may be necessary based on local regulations, MS4 permit requirements, implementation strategies, or water quality issues. Remember to obtain copies of any applicable documents or files which may assist in writing the MS4 evaluation report.

Staff Interviewed		
Name	Department/Agency	Phone Number/Email

Ordinance/Legal Authority	
Interview Questions	Response
Ordinance which requires industrial/commercial facilities to install BMPs or minimize pollutant	

- Provide roughly 2weeks notice of audit to MS4
- All 8 are not notified at the same time
- This is to make the process equitable for all (not provide 2 weeks notice for City A and 6 weeks for City B)
- Set up conference call upon notification to set schedule, help prepare the MS4
- Records request –provide information to ADEQ/contractor

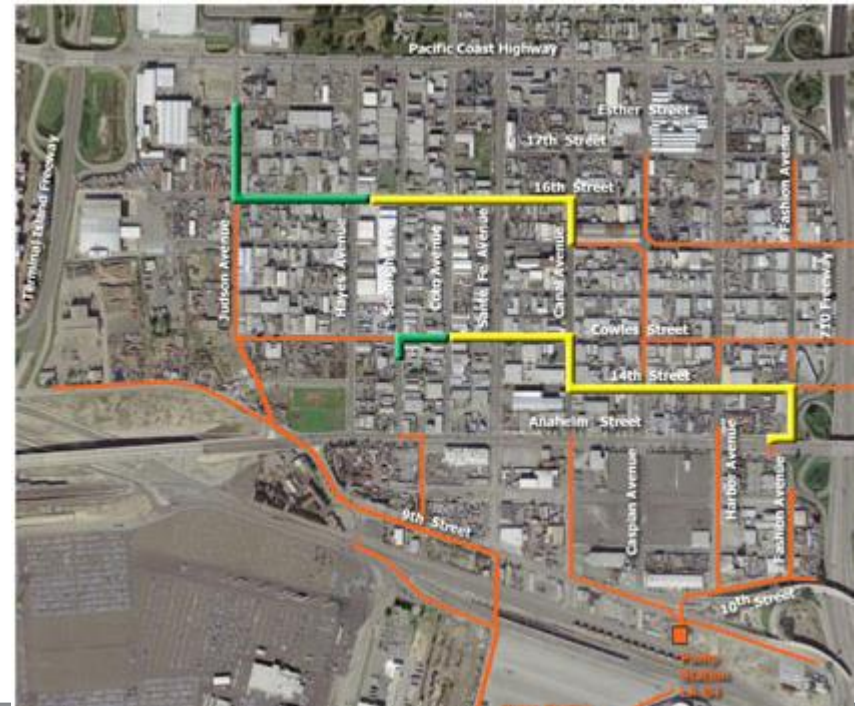


- ADEQ will select all or some of the 6 minimum control measures to be evaluated
- Typically, it will be 3 of the 6, so not a complete assessment of the entire stormwater program
- The “on-site” portion of the audit will last 1.5 to 2 days
- Includes record reviews and site visits (construction sites [public and private], municipal facilities, etc.)



Other things that ADEQ will look at:


- Mapping (status, features, tools, capabilities, etc.)
- System outfalls
- Legal authority (municipal code/ordinance, etc.)
- Staffing / personnel roles



- The MS4 should identify appropriate personnel and make them available for all or some of the on-site process
 - The document review will include examples of inspection records, SOPs, reports, etc.
- “If it isn’t documented, it didn’t happen”



- At the end of the on-site portion of the audit, ADEQ will meet with MS4 personnel to go over preliminary findings
- ADEQ will provide the MS4 a copy of the preliminary findings report



PRELIMINARY FINDINGS
Municipal Separate Storm Sewer System
Program Evaluation

The Arizona Department of Environmental Quality is providing this summary of preliminary findings resulting from the Municipal Separate Storm Sewer System program evaluation. This summary of preliminary findings does not constitute the department's final assessment of program efficacy, permit compliance, or adherence to your [Stormwater Management Plan](#). Upon review and evaluation of all information resulting from the audit process, the department will prepare and issue a final report which may include additional recommendations and areas of potential non-compliance. Please submit all correspondences to:

Arizona Department of Environmental Quality
Stormwater and General Permits Unit
1110 West Washington Street, 5415A-1
Phoenix, Arizona 85007

A. GENERAL INFORMATION

Operator Name: _____

Permit Number: _____ Authorization Number: _____

Date of Audit: _____ City: _____ State: _____ Zip Code: _____

Phone Number: _____ Fax: _____ E-mail: _____

B. PERSONNEL

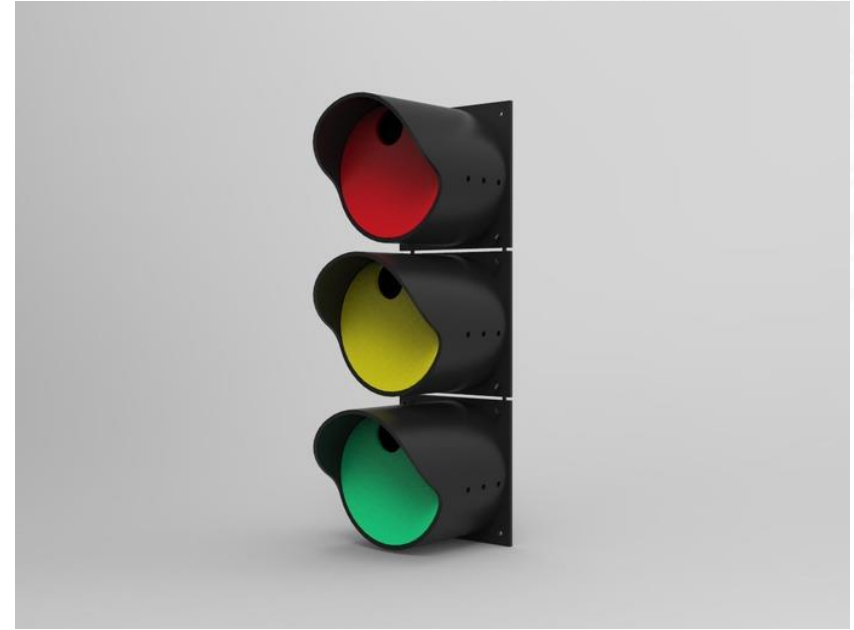
Name	Affiliation	Title

- ADEQ will prepare a final report of the audit findings and will include a discussion of program deficiencies and potential violations, as appropriate.
- The MS4 will be given an opportunity to formally respond to the findings.



Follow-up Activities:

- Technical assistance
- Follow-up evaluation
- Targeted evaluation
- Enforcement



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