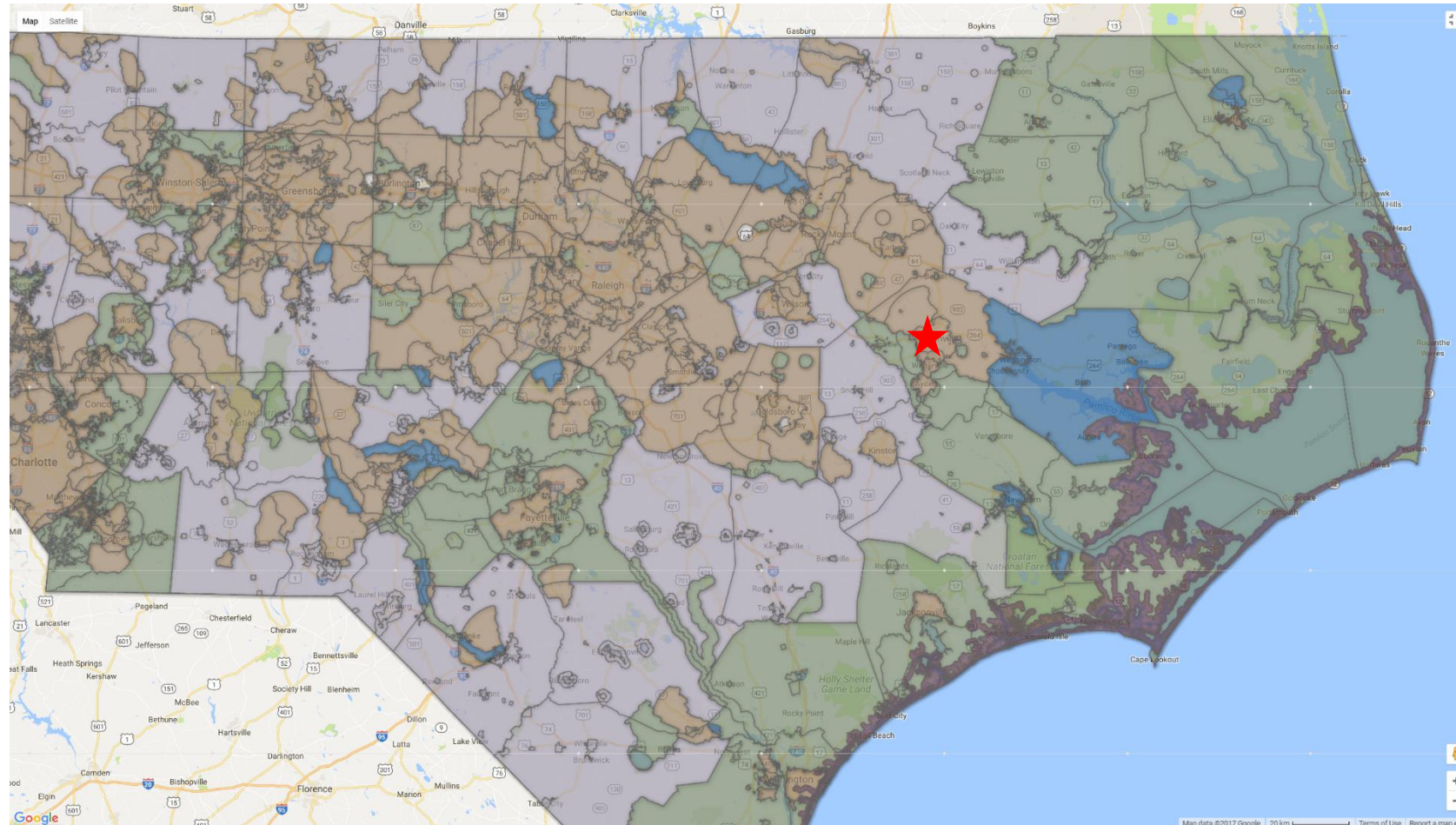


MS4 Audit Success

NC has 122 permitted MS4's
2018 EPA began compliance initiative
2019 NCDEQ began audits on 5 yr cycle
December 3-5 City of Greenville, NC Audit

Overlapping Programs



<https://deq.nc.gov/about/divisions/energy-mineral-land-resources/energy-mineral-land-data/stormwater-maps-gis-resources/Stormwater-Permitting-Interactive-Map>

NCDEQ MS4 Audits

Audit Results	Quantity
Notice of Compliance (NOC)	3
Notice of Deficiency (NOD)	3
Notice of Violation (NOV)	24
Compliance Decision Pending	5
Total Audits Completed	35

Top 3 Deficiencies

- Lack of Documentation
you can't prove it, it didn't happen!
- Incomplete MS4 Mapping
All major outfalls should already be mapped!
- Reactive Illicit Discharge Programs
MS4s are required to proactively find and eliminate illicit discharges!

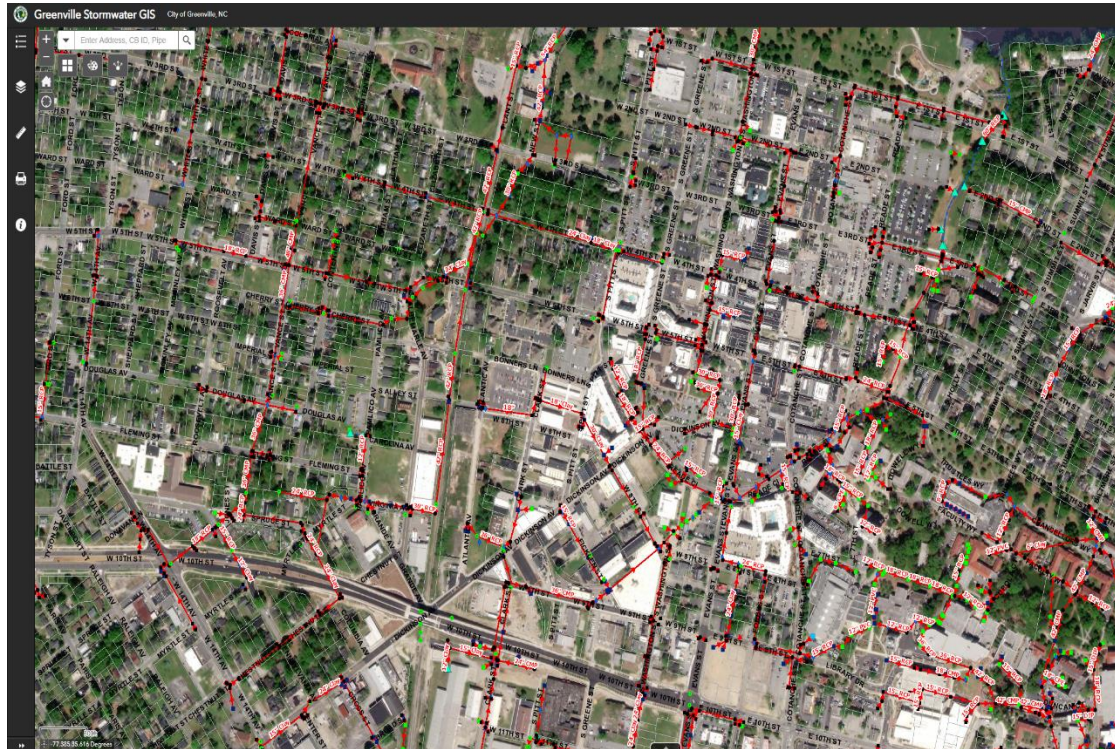
Read Permit & SWMP

- Public Education & Outreach
- Public Involvement & Participation
- Illicit Discharge Detection & Elimination
- Construction Site Runoff Controls
- Post-Construction Site Runoff Controls
- Pollution Prevention & Good Housekeeping
 - Municipal Facilities Operation and Maintenance
 - Spill Response
 - MS4 Operation and Maintenance
 - Municipal SCM Operation and Maintenance
 - Pesticide, Herbicide and Fertilizer Management
 - Vehicle and Equipment Maintenance
 - Pavement Management

Use Audit Template

Audit Details	
Audit ID Number: NCS000XXX_City MS4 Audit_2019MODAY	Audit Date(s):
<p>Minimum Control Measures Evaluated:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Program Implementation, Documentation & Assessment <input type="checkbox"/> Public Education & Outreach <input type="checkbox"/> Public Involvement & Participation <input type="checkbox"/> Illicit Discharge Detection & Elimination <input type="checkbox"/> Construction Site Runoff Controls – No delegated Sediment and Erosion Control Program <input type="checkbox"/> Construction Site Runoff Controls – Delegated Sediment and Erosion Control Program <input type="checkbox"/> Post-Construction Site Runoff Controls <input type="checkbox"/> Pollution Prevention and Good Housekeeping for Municipal Operations <input type="checkbox"/> Total Maximum Daily Loads (TMDLs) <p>Field Site Visits:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Municipal Facilities. Number visited: Choose an item. <input type="checkbox"/> MS4 Outfalls. Number visited: Choose an item. <input type="checkbox"/> Construction Sites. Number visited: Choose an item. <input type="checkbox"/> Post-Construction Stormwater Runoff Controls. Number visited: Choose an item. <input type="checkbox"/> Other: _____ Number visited: Choose an item. <input type="checkbox"/> Other: _____ Number visited: Choose an item. 	
Inspector(s) Conducting Audit	
Name, Title	Organization

Perform Self Audit



- Ordinances
- SOPs
- Inspection Forms
- Facility Inspections

- Maps
- Training Documentation
- Records

Management Support



- City Managers Office
- Elected Officials
- Public Works
- Fire Department
- Facilities Operations

Correct Deficiencies

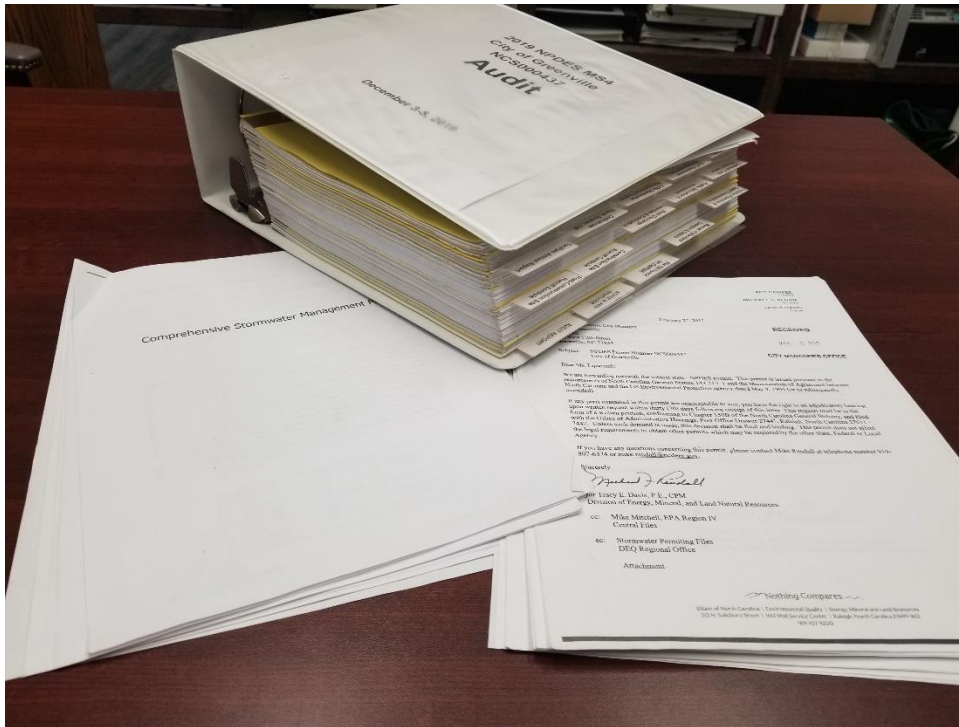


- Clean up facilities
- Gather and organize records
- Update SOPs & SWMP

- Develop plan for issues you can't quickly resolve
- Train employees



Know your stuff



- Have appropriate staff present (no extra staff)
- Have all ordinances and plans at your fingertips



- Hire help if you need it
- Calm confidence
- Answer positively