

WWA IDDE Audit Worksheet

Date of Evaluation
Evaluator Name, Title
MS4 Permittee, Permit #
Receiving Waters

Instructions: Use this worksheet as a guide for interviewing 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, and annual report responses. This document represents a starting point of appropriate questions to ask pertaining to the subject. Remember to obtain copies of any applicable documents or files which may assist in writing the MS4 evaluation report.

Staff Interviewed		
Name/Title	Department/Agency	Phone Number/Email

MS4 MAPPING: S5.C.3.a

Questions	Yes	No
Outfalls, discharge points, and receiving waters, other than ground water mapped?	<input type="checkbox"/>	<input type="checkbox"/>
Public stormwater treatment and flow controls facilities/BMPs?	<input type="checkbox"/>	<input type="checkbox"/>
Tributary conveyance w/ ≥ 24 " dia. /x-sect; incl: type, material, size, associated drainage area, land use?	<input type="checkbox"/>	<input type="checkbox"/>
All allowed connections to MS4 after 2/16/07?	<input type="checkbox"/>	<input type="checkbox"/>
Connections btwn MS4 & other Muni/public?	<input type="checkbox"/>	<input type="checkbox"/>
MS4 areas that do not discharge to surface?	<input type="checkbox"/>	<input type="checkbox"/>
Does the map contain additional information, such as the following (circle those that apply):		
<ul style="list-style-type: none"> ▪ Roads with drainage systems ▪ Municipal streets ▪ Catch basins ▪ Curbs ▪ Gutters ▪ Ditches ▪ Man-made channels ▪ Storm drain manholes ▪ UIC wells 		
How often are maps updated?		
Do you share your maps with any neighboring jurisdictions/entities (list) ?		

Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	<input type="checkbox"/>	<input type="checkbox"/>

Notes

Helpful tip: Have they read our UIC well guidance?

MS4 MAPPING: S5.C.3.a		
Questions	Yes	No

ORDINANCE/REGULATORY MECHANISM: S5.C.3.b.		
Question	YES	NO
Prohibits non-SW/illicit discharges to MS4?	<input type="checkbox"/>	<input type="checkbox"/>
Includes correct allowable/conditionally allowable discharges?	<input type="checkbox"/>	<input type="checkbox"/>
Addresses any allowable discharge that is a significant pollutant source?	<input type="checkbox"/>	<input type="checkbox"/>
Describe escalating enforcement/compliance procedures in ordinance:		
Does the ordinance or legal authority allow the municipality access to a property to investigate an illicit discharge?	<input type="checkbox"/>	<input type="checkbox"/>
Established compliance strategy, including available tools such as: Public education Technical assistance Operational/structural source control BMPs Maintenance requirements for private facilities	<input type="checkbox"/>	<input type="checkbox"/>
<i>*Note: Have until Feb 2, 2018 to update, if needed</i>		
Written Escalating enforcement tools (Circle those that apply)? Notices of Violations (NOV) Administrative fines Stop-work orders Civil penalties Criminal penalties Other:		
How are enforcement cases being tracked?		
Applicable Documents	Reviewed	Obtained
Ordinance/regulatory mech. Title: Code section:	<input type="checkbox"/>	<input type="checkbox"/>

Written compliance strategy or alternative format?	<input type="checkbox"/>	<input type="checkbox"/>
Enforcement escalation procedures/approach	<input type="checkbox"/>	<input type="checkbox"/>

Notes

Describe how you are implementing your compliance strategy, including escalating enforcement actions and other tools. Give specific examples.

What is the typical response/follow-up action when violations are discovered?

DETECTION OF I.D.: S5.C.3.c

Interview Question	YES	NO
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Program developed describing methods to investigate and field screen? Dry-weather?	<input type="checkbox"/>	<input type="checkbox"/>
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Describe methods (Also check AR):

How do you plan to field screen 40% of MS4 no later than 12/31/17* & 12% after (*Aberdeen: 6/30/2018)?

TMDL requirements for focused field screening in a particular area?

Frequency and extent of field screening to date in current permit

cycle?

Checklist or reporting form used?

Applicable Documents

Reviewed

Obtained

IDDE Manual or program document

Checklist/site visit form

Tracking documents?

Notes

What are common IDs? E.g. restaurant fats, oils, grease cleaning, spoils materials disposal.

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I.D. ELIMINATION.: S5.C.3.d

Interview Question	YES	NO
<p>Written procedures to characterize and evaluate any I.D. found or reported?</p> <p>Describe methods and timing (Check AR):</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Written procedures for tracing the source of I.D.?</p> <p>Detail the inspection procedures and timing:</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Written procedures to eliminate discharge?</p> <p>How are notifications sent out? Appropriate authorities: Property Owner:</p> <p>What is your process to confirm illicit discharges eliminated?</p> <p>How are actions taken to characterize, trace and eliminate each illicit discharge found by or reported to the permittee? What type of database is used?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Timely response and reporting?</p> <p>[G3 – Immediate response for threats to health; investigate w/in 7 days (avg) for I.D. complaints, reports, or monitoring; investigate w/in 21 days of any report or discovery of illicit connection; elimination within 6 mos]</p>	<input type="checkbox"/>	<input type="checkbox"/>

Training: S5.C.3.e

How are general municipal field staff trained to identify, report, and respond to illicit discharges?

How to you determine a G3 reportable (i.e. ERTS) discharge?

Frequency of training:

Most recent training?

Materials used to train staff:

How are IDDE staff trained to identify, investigate, clean up and report?

Frequency of training:

Most recent training:

Applicable Documents	Reviewed	Obtained
IDDE Manual or program document	<input type="checkbox"/>	<input type="checkbox"/>
Tracking documents?	<input type="checkbox"/>	<input type="checkbox"/>
General Field Staff Training Materials (roster, curriculum)	<input type="checkbox"/>	<input type="checkbox"/>
IDDE Staff Training Materials (roster, curriculum)	<input type="checkbox"/>	<input type="checkbox"/>

Notes

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Public Awareness & Reporting		
Interview Questions	Yes	No
How are complaints from the public tracked? Describe:	<input type="checkbox"/>	<input type="checkbox"/>
Publicly listed and publicized SW hotline?	<input type="checkbox"/>	<input type="checkbox"/>
Outreach materials used to educate staff, businesses, public about hazards of illicit discharges and improper waste disposal?	<input type="checkbox"/>	<input type="checkbox"/>
Applicable Documents	Reviewed	Obtained
Examples of outreach materials		
Hotline advertising		
Print out of complaint database or tracking system files		
Notes		
<p><i>Subwatersheds or neighborhoods prioritized for outreach based on complaints or land use?</i></p>		

As a part of the audit, review complete paperwork trails for several illicit discharge events (including a spill and an unknown illicit discharge in the storm drain system). Determine if the full investigation process was documented and if adequate enforcement actions taken when required.

Illicit Discharge Location or Case File Name #1:		
Summarize illicit discharge event:		
Full investigation process documented, including a description of actions according to the required timeline of S5.C.3.d.iv?	YES	NO
Source determined?	YES	NO
Enforcement action taken?	YES	NO
Describe:		
Notes:		

Illicit Discharge Location or Case File Name #2:		
Summarize illicit discharge event:		
Full investigation process documented, including a description of actions according to the required timeline of S5.C.3.d.iv?	YES	NO
Source determined?	YES	NO
Enforcement action taken?	YES	NO
Describe:		

Illicit Discharge Location or Case File Name #2:

Notes:

Notes

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