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Consult your attorney for advice concerning specific situations.

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How to Prepare for an SMS4 Audit


SCASM
March 7, 2024
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Topics

- Audit expectations
- How to prepare for an audit
- Common deficiencies found during audits
- How to highlight continuous improvement in your program
- Potential audit results
- What to do after an audit




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Audit Expectations

- At least once per permit cycle
- Expect a call or email from a DHEC Compliance Manager
 - Approximately 2 to 4 weeks prior to the audit
- Requests
 - Audit Checklist
 - List of Active Construction Sites
 - List of Priority Municipal Facilities
 - At least 1 commercial and 1 residential set of approved plans
- 1 or 2 days
 - Interview
 - Field portion (Construction, Post-construction, Good Housekeeping)
 - Plan Reviews (during or after audit)





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Audit Expectations

- Interview
 - Organizational Chart (responsibilities)
 - Annual Report
 - Public Education, Outreach & Participation
 - Procedures
 - Addressing Pollutants of Concern
 - Illicit Discharge Detection & Elimination (IDDE)
 - Procedures
 - Outfall Map
 - Dry Screening
 - Public Reporting mechanism
 - List of IDDE complaints & status/enforcement




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Audit Expectations

- Interview
 - Good Housekeeping
 - Written procedures (SWPPPs)
 - Inventory of Priority Facilities (Public Works, Fleet Maintenance, Recycle Centers, etc)/ Industrial Facilities (Airport, WWTP, Landfill, etc)
 - Annual Inspections of Priority Facilities and Stormwater Control Structure
 - Annual employee training
 - Management of Construction Site Runoff
 - Written procedures
 - Inspection documentation
 - Staff training
 - Enforcement
 - Selection of Active Construction Sites for audit



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Audit Expectations

- Interview
 - Management of Post-Construction Site Runoff
 - Inventory of stormwater control structures
 - Inspection documentation (once per permit cycle)
 - Enforcement
 - TMDLs
 - List of Impaired Waters and TMDLs
 - Monitoring Plan(s)
 - Monitoring results
 - Implementation Plan
 - Progress on Implementation Plan

South Carolina 303(d) List of Impaired Waters & TMDLs

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Audit Expectations

- Field Portion
 - Management of Construction Site Runoff
 - Visit residential and commercial sites (2 to 5 sites)
 - Audit inspector
 - Previous inspections & frequency of inspections by MS4
 - Weekly CEPSCI inspections
 - Enforcement
 - Management of Post-Construction Site Runoff
 - Visit one or more SCS
 - Audit inspector
 - Enforcement




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Audit Expectations

- Field Portion
 - Good Housekeeping
 - Visit one or more High Priority facilities
 - Invite facility manager
 - Audit inspector
 - Pollutants exposed to stormwater?
 - Outfalls
 - Visit a municipally-owned/maintained stormwater control structure




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Audit Expectations

- TMDL Requirements
 - DHEC is still working on the procedure for when TMDL requirements will be reviewed - during the audit and/or at permit reissuance
 - They want to evaluate **whether progress is being made** on water quality. Is the Implementation Plan working?
 - Is MS4 evaluating monitoring results, investigating high numbers and taking action?




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How to Prepare for an Audit

- Perform internal audit (in advance of DHEC/EPA audit)
- Ensure correct contact info in ePermitting
- Who should attend audit?
 - Stormwater Manager
 - Department Head and/or Municipal Manager
 - Consultant
 - Inspector(s)
 - Plan Reviewer(s)
 - Manager(s) of Priority Facility/ies
- Organize Documentation / SWMP
 - Need to be able to locate quickly
 - May be digital




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Common Deficiencies Found During Audits

- Poor documentation including lack of written procedures
- Insufficient ordinance
- Improper signatory authority
- Lack of Enforcement Response Plan
- Lack of Annual Reports submitted



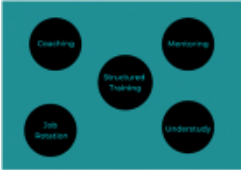
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Common Deficiencies Found During Audits

- Lack of up-to-date maps
 - Regulated outfalls
 - Urbanized area/municipal boundary
- Lack of annual training
 - Priority facilities' staff
 - Inspectors
 - New employees
- Lack of MS4 implementation when municipality annexes across county-line



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Common Deficiencies Found During Audits

- Illicit Discharge Detection and Elimination
 - Update outfall map for annexations
 - Lack of legal authority to implement IDDE program
 - Lack of/inadequate Enforcement Response Plan
 - Lack of public education/comment procedure
 - Lack of documentation of complaints
 - Lack of dry screening of outfalls in priority areas
 - Lack of documentation of investigation (failing septic & SSOs)
 - Lack of enforcement

ILLCIT CONNECTIONS/WATER QUALITY CONCERNS

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Common Deficiencies Found During Audits

- Illicit Discharge Detection and Elimination
 - Illegal sewer connection

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Common Deficiencies Found During Audits

- Illicit Discharge Detection and Elimination
 - Evidence of paint poured down storm drain

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Common Deficiencies Found During Audits

- Management of Construction Site Runoff
 - Lack of adequate land development regulations
 - Lack of inspections of active sites by permit deadlines (tracking of inspections)
 - Lack of documentation of inspections (meet current CGP requirements)
 - Inspectors not properly trained
 - Lack of thorough inspections (ensure no off-site impacts)
 - Lack of enforcement
 - Allowing elected officials to influence enforcement
 - Lack of follow-up/oversight when another entity agrees to inspect



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Common Deficiencies Found During Audits

- Management of Construction Site Runoff
 - Lack of stabilization



Common Deficiencies Found During Audits


- Management of Construction Site Runoff
 - Lack of BMP maintenance



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Common Deficiencies Found During Audits

- Management of Construction Site Runoff
 - Lack of BMP maintenance/improperly installed




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Common Deficiencies Found During Audits

- Management of Construction Site Runoff
 - Insufficient BMPs and lack of street sweeping




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Common Deficiencies Found During Audits


- Management of Construction Site Runoff
 - Offsite impacts



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Common Deficiencies Found During Audits

- Management of Post-Construction Site Runoff
 - Insufficient post-construction regulations/ordinance
 - Lack of inventory of stormwater control structures (SCSs)
 - Lack of inspections of SCSs
 - Public
 - Private
 - Lack of maintenance/enforcement of SCSs





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Common Deficiencies Found During Audits



- Management of Post-Construction Site Runoff



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Common Deficiencies Found During Audits

- Management of Post-Construction Site Runoff





Common Deficiencies Found During Audits

- Plan Reviews
 - Not enforcing requirements for permitting Larger Common Plans
 - Not meeting water quality/quantity requirements for each and every outfall leaving site (not combined)
 - Not meeting post-dev +/- pre-dev peak flow rates for >2 acre projects
 - Not meeting 80% trapping efficiency for sites >10 acres
 - Not addressing post-construction water quality for sites > 5 acres
 - Post-construction water quality based on impervious surfaces vs. 1 inch over total drainage area
 - Lack of phased land disturbance for >5 acres (2 phases) and >10 acres (3 phases)
 - Not meeting undisturbed buffer (30ft/45ft)
 - Lack of maintenance agreement or unsigned
 - Lack of/incomplete checklist
 - Lack of as-built

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Common Deficiencies Found During Audits

- Pollution Prevention/Good Housekeeping for Municipal Operations
 - Lack of inventory of High Priority Facilities
 - Lack of annual inspections/documentation
 - Not inspecting outfalls
 - Lack of maintenance (different department)
 - Lack of maintenance of municipal-owned stormwater control structures
 - Proper use of secondary containment
 - Lack of annual staff training



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