



# Achieving MS4 Environmental Compliance with an Internal Compliance Program

How a local MS4 mitigated potential permit pitfalls by implementing an internal audit program




# **Trial by Fire**

The City of Lincoln  
NPDES/MS4 Permit  
was audited by the  
EPA in July 2016.



## Compliance matters

The EPA can issue fines for non-compliance – a minimum of \$2500 and maximum of \$25,000 per day for the first offense, and a maximum fine of \$52,000 per day for the second offense.



Administrative Staff rely on  
managers to provide  
necessary information in  
an audit/and or crisis  
situation

*Are they prepared?*

*Are you?*

# Capturing Institutional Knowledge:

- Experience speaks volumes!



What if they retire?

What if they become ill?

Are we prepared?

How do we  
consolidate critical  
information into a  
logical order that can  
than be shared  
across multiple  
platforms?

Cutting through the Red Tape...



So where do you  
start?





Digging  
in...









One on One  
meetings were  
crucial...

- Ensured accountability
- Allowed for assessment of overall knowledge
- Garnered a basic understanding of processes
- Aided in identifying what may or may not be missing



Do we  
have the  
right tools  
to do the  
job?

Table 1: Assessment Ratings Definitions	
Rating Definition	Symbol Key
Generally conforms with the requirements of APWA Management Practices Manual, Chapter 40, and ISO 14001:2004 standard	
Formal procedure is documented but not fully implemented, or a formal process is implemented but not fully documented	
Informal process in place	
No process in place	


# Initial Assessments

# Recommendations based on results...

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Tellevate conducted an  
Environmental Management  
and IT Assessment

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Implementation  
of training

Incorporation of  
Emails

Creation of  
forms

The Sharepoint Site was  
created

# Up and Running!

Office 365

BROWSE PAGE



[COLPWU Team Site](#)

[EMS Elements \(APWA Chapter 40\)](#)

[Environmental Areas](#)

[Organizations](#)

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Home

Welcome to PWU's EMS Website!

The purpose of the Environmental Management System (EMS) website is to communicate the elements of the EMS and provide PWU personnel with access to important information related to the environmental risks and regulatory requirements associated with PWU's operations and activities.

The EMS is based on the American Public Works Association (APWA) Public Works Management Practices Manual framework in Chapter 40 and provides a standardized set of processes to identify, prioritize, and manage environmental risks.

Please contact the PWU SharePoint Coordinator, Shannon Ideus, at (402) 405-2372, with questions or feedback related to the EMS SharePoint website.

## Compliance Tools



[Documents and Records](#)



[Calendar](#)



[Contacts](#)



[Related Links](#)





# Documents and Records

- Home
- Documents and Records**
- Calendar
- Contacts
- Related Links
- SharePoint User Guide
- Site Contents
- Recycle Bin
- EDIT LINKS

All Documents									
Find a file									
✓	Edit	Name	...	Environmental Area	Organization	Document Type	Permit/Project	Permit Number	EMS Element
		1 DryWeatherMon 15-16	...	Municipal Separate Storm Sewer System (MS4) Program	Watershed Management	Procedure	MS4 Permit - Illicit Discharge Detection and Elimination; MS4 Permit - Monitoring; MS4 Permit - General; MS4 Permit - Reporting		
		160111 basin inspection form	...	Municipal Separate Storm Sewer System (MS4) Program	Street Maintenance; Watershed Management	Checklist/Form	MS4 Permit - Pollution Prevention and Good Housekeeping	NE01333671	
		171012 Street Sweeping Study 2017	...	Municipal Separate Storm Sewer System (MS4) Program	Street Maintenance; Watershed Management	Report	MS4 Permit - Illicit Discharge Detection and Elimination; MS4 Permit - Reporting	NE01333671	
		2 Complaints 15-16	...	Municipal Separate Storm Sewer System (MS4) Program	Watershed Management	Report	MS4 Permit - General; MS4 Permit - Construction Site Runoff Control; MS4 Permit - Illicit Discharge Detection and Elimination; MS4 Permit - Public Participation and Involvement; MS4 Permit - Reporting	NE01333671	
		2016DWMReportFinal 11-18-16docx	...	Municipal Separate Storm Sewer System (MS4) Program	Watershed Management	Report	MS4 Permit - Illicit Discharge Detection and Elimination; MS4 Permit - Monitoring		
		2017 City of Lincoln PWU - Admin SharePoint Training 09 11 2017 with sign in sheet	...	Municipal Separate Storm Sewer System (MS4) Program	Street Maintenance; Fleet and Facilities Maintenance; Watershed Management	Training	MS4 Permit - General		40.7 Training and Awareness
		2017 City of Lincoln PWU - Contributors SharePoint Training 09 12-13 2017 with sign in sheets	...	Municipal Separate Storm Sewer System (MS4) Program	Fleet and Facilities Maintenance; Street Maintenance; Watershed Management	Training	MS4 Permit - General		40.7 Training and Awareness
		3 Complaints 15-16	...	Municipal Separate Storm Sewer System (MS4) Program	Watershed Management	Report	MS4 Permit - Illicit Discharge Detection and Elimination; MS4 Permit - Public Participation and Involvement; MS4 Permit - General; MS4 Permit - Reporting		

# Documents and Records



Houston...  
we have a  
problem



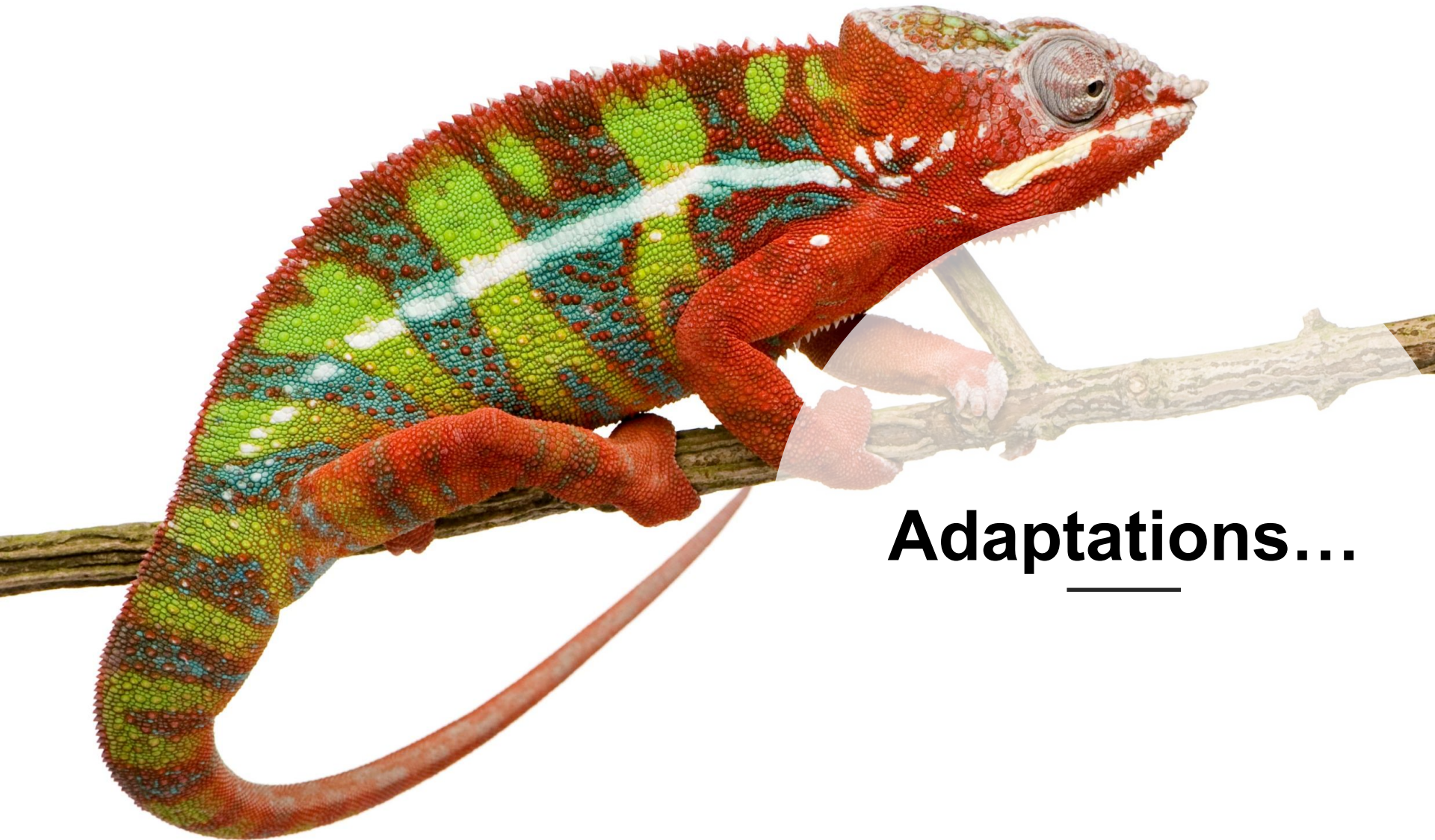
Could this have been  
avoided?





**Starting Over?**





**Adaptations...**

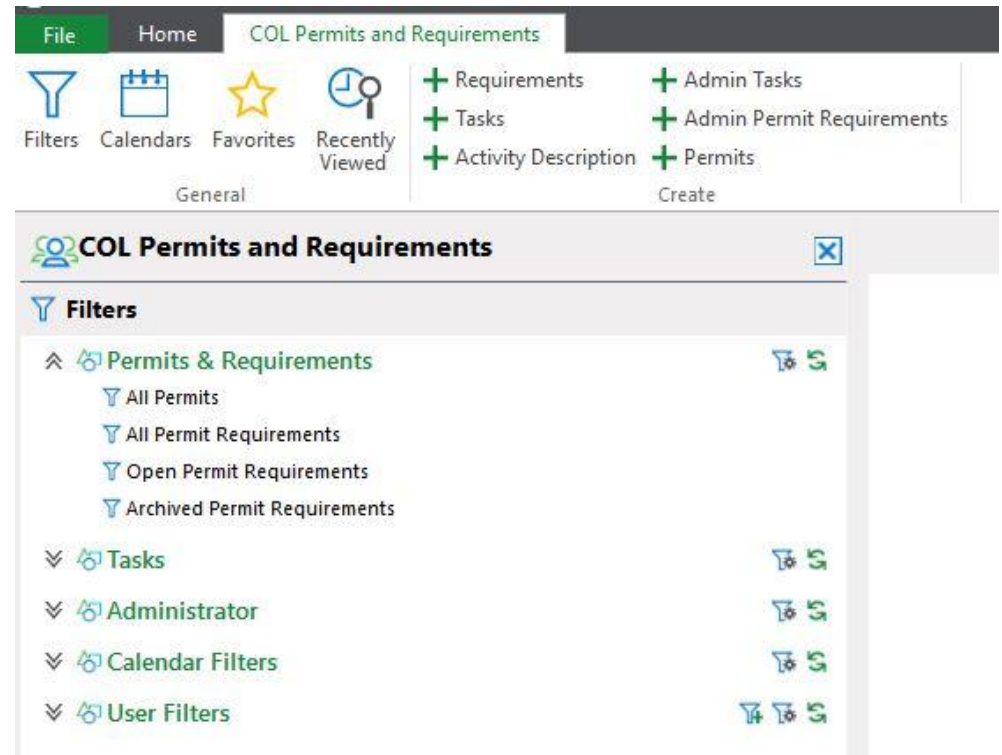


Weighing the options...



# OnBase Permit Solution

- All Permits available in one platform
- Permit Requirements listed for each
- Tasks needed for each Requirement easily identified



FilePermits

Save

Save and Close

Save and New

Delete

Copy Object

Add to

Refresh

Subscribe

History

History

Documents

Forms

Compose

Import

Discussions

Start a Discussion

Print

Print Preview

Permit Summary

Related Requirements

Related Documents

Permits

2/11

Import Permit Document

Permit Summary

NPDES Permit

NE0133671

Permit Status

Open

Start Date

11/1/2018

Division

Storm Water

Expiration Date

10/31/2023

Permit

2018

Additional Information

Permittee: City of Lincoln, Nebraska"Authorization to Discharge Under the National Pollutant Discharge Elimination System (NPDES)"

"This NPDES permit is issued in compliance with the provisions of the Federal Water Pollution Control Act (33 U.S.C. Sec. 1251 et. Seq. as amended to date), the National Environmental Protection Act (Neb. Rev. Stat. Secs 81-1501 et. Seq. as amended to date), and the Rules and Regulations promulgated pursuant to these Acts. The permit authorizes the storm sewer system (MS4) identified in this permit is authorized to discharge storm water and other authorized flows, and is subject to the limitations, requirements, conditions set forth herein. This permit regulates and controls the release of pollutants in the discharges authorized herein. This permit does not relieve Permittees of their responsibilities under the Nebraska Environmental Protection Act, as amended, or established by regulations promulgated pursuant thereto."

Coverage:

All discharges from the Lincoln MS4 system that discharge to waters of the State, including any MS4 discharges that may reach waters of the State through intermediate streams or conduits.

Receiving Water: Salt Creek and several tributaries

Action	Σ	Reoccurrence	Σ	Action Item	Σ
	▼ ⌵	■	▼ ⌵	■	▼ ⌵
Public Education and Outreach		All Years		Implement or maintain a memorandum of the goals, objectives, target audience and distribution process of materials for the public education and outreach program	
Public Education and Outreach		All Years		Report on public education and outreach efforts (e.g. classes, billboards, mailings, inlet stamping, projects, etc)	
Public Education and Outreach		All Years		Maintain a web site and make available a list of resources, projects, education tools and stormwater quality events	
Public Participation and Involvement		All Years		Keep website updated with a summary of the most recent annual report	
Public Participation and Involvement		All Years		Provide public notice on ordinance revisions related to NPDES items and include updated NPDES permits and Stormwater Management Plans on the website	
Public Participation and Involvement		Permit Period		Once during the permit period conduct a survey and provide a summary on the City's webpage	
Public Participation and Involvement		All Years		Report on the different participation events held (e.g. Earthday, Earth Wellness, Open Houses related to stormwater, etc)	
Discharge and Elimination		All Years		Maintain an updated storm drain map	
Discharge and Elimination		All Years		Conduct dry weather monitoring at approximately 50 outfall locations. If flow is present, constituents to be monitored will be specifically geared to those listed in the NDEQ basic requirements, pH, total chlorine, total copper, total phenol and detergent...	
Discharge and Elimination		All Years		Investigate and enforce as necessary illicit discharges found during field screening or other activities	
Discharge and Elimination		All Years		Implement and maintain written procedures for illicit discharge program	
Discharge and Elimination		All Years		Provide local controls as necessary for locally exempted non-stormwater discharges, not already exempted per the permit. Per the permit no non-stormwater discharges may be exempted if it is	

**The elements  
of the SWMP  
are listed as  
the  
“Requirements”**

# The “Task” is done to complete the “requirement”

Save

Save and New

Add to +

Refresh

History

Documents

Forms

Import

Start a Discussion

Print Preview

Navigation

Save

Delete

Actions

History

Documents

Discussions

Print

Task

Related Documents

Tasks

Created By: COL MS4 ADMIN

9/20/2018 4:02:12 PM

Import Task Document

Tasks

NPDES Permit

NE0133671

Task Status

In Progress

Calendar Heading

Outreach Events

Requirement Type

Reporting

Permit Year

Year 1

Organization

Watershed Management

Completed

Permit Requirement

Create opportunities for citizens to participate in the City's stormwater program

Action Item

Report on the different participation events held (e.g. Earthday, Earth Wellness, Open Houses related to stormwater, etc)

Compliance Deadline

Internal Due Date

Completion Date

Primary Division/Department

Primary Person Responsible

# Activity Related to a Task

Primary Division/Department	Primary Person Responsible
<input type="text"/>	<input type="text"/>
Secondary Division/Department	Secondary Person Responsible
<input type="text"/>	<input type="text"/>

**Activity**

<input type="checkbox"/>	Activity User	Activity Description	Created Date
<div><div>ActivityDescription</div><div><div>File</div><div>Activity Description</div></div><div><div><div>Save</div><div>Save and Close</div><div>Save and New</div><div>Delete</div></div><div><div>Copy Object</div><div>Add to</div></div><div><div>Refresh</div><div>Subscribe</div></div><div><div>History</div><div>History</div></div><div><div>Documents</div><div>Forms</div><div>Documents</div></div><div><div>Compose</div><div>Import</div></div><div><div>Discussions</div><div>Start a Discussion</div></div><div><div>Print</div><div>Print Preview</div></div><div><div>Navigation</div></div></div></div>			
<u>Activity Description*</u>			<b>Created Date</b>
<b>ActivityDescription</b>			<b>4/17/20</b>
<b>Activity Description</b>			
Activity User			
<input type="text" value="WSMSMI"/>			
Activity Description*			
I have conducted my annual inspections of all large permit sites located in the west quadrant sites.			



# Email Notifications can be sent:

- Upon completion of a task
- To notify staff to perform a task by a specific date
- To notify management of an upcoming task deadline
- To notify management of a missed task deadline





## Tasks Outside the Department



# What's Next?

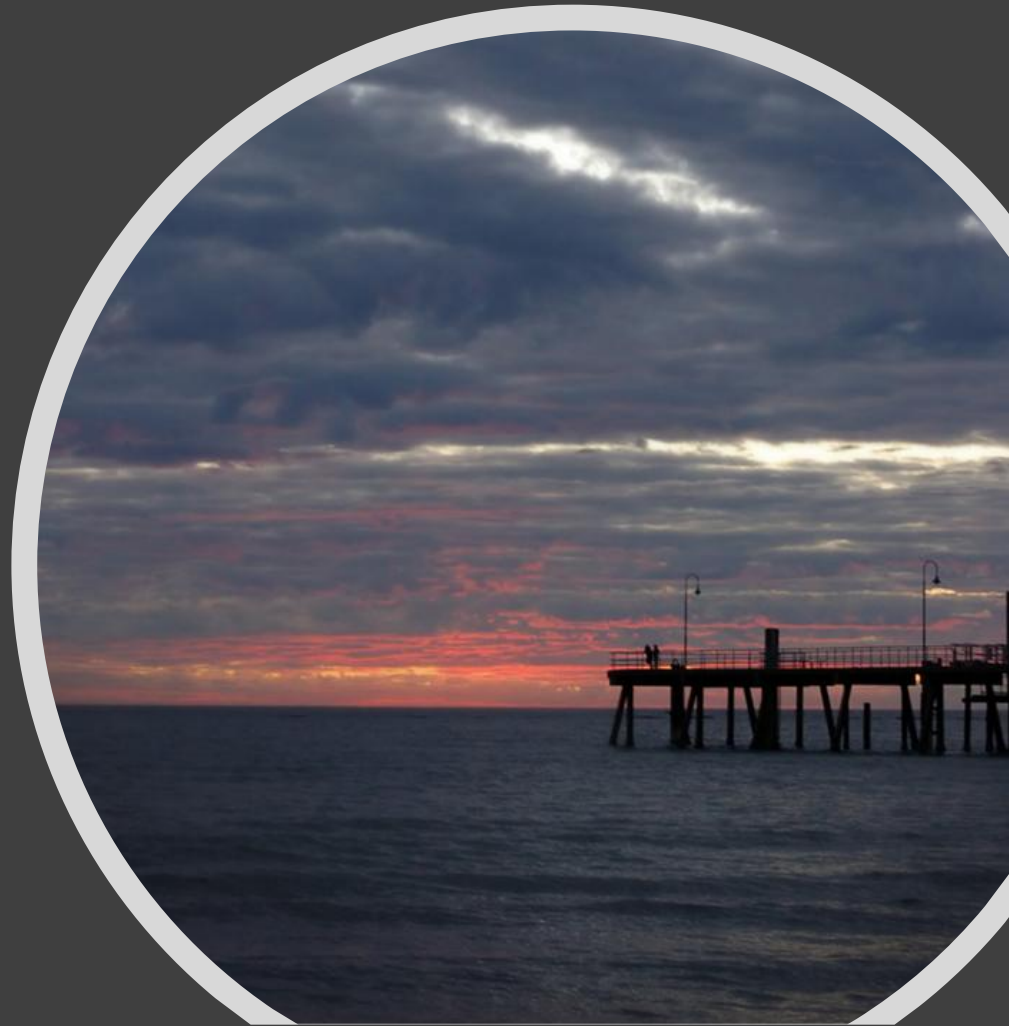






New Growth after the “Fire”

**Gratitude...**





**Questions?**

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Lincoln Transportation & Utilities  
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