



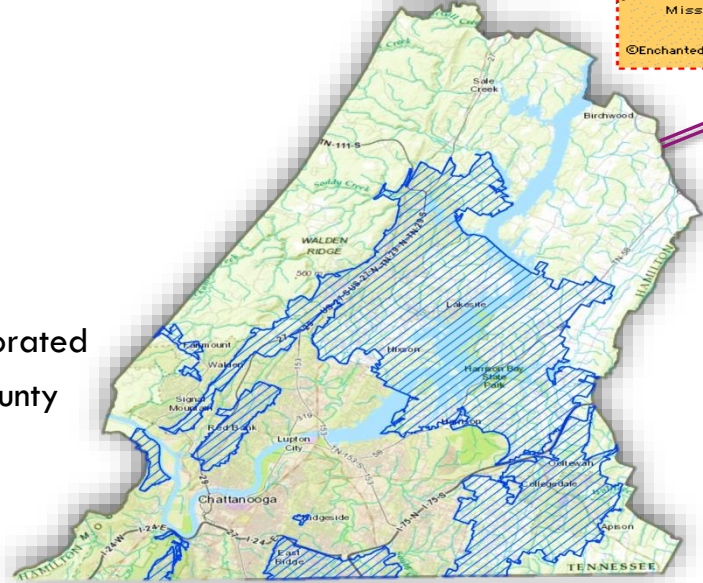
SURVIVING AN AUDIT DURING A PANDEMIC

Crystal Bishop, CPMSM
Stormwater Manager, Hamilton County, TN

Hamilton County Water Quality Program Jurisdiction

9 Co-Permittees in the Hamilton Co. Program

- ❑ Collegedale
- ❑ East Ridge
- ❑ Lakesite
- ❑ Lookout Mountain
- ❑ Red Bank
- ❑ Ridgeside
- ❑ Soddy Daisy
- ❑ Walden
- ❑ Urbanized Unincorporated Hamilton County



Tennessee MS4 Audit – Pandemic Style

- Hamilton County MS4 Program Audit
 - ▣ September 2020
 - Virtual – Full Day
 - Ordinance Review
 - Document Review
 - SOPs Review
 - Field Inspection – Full Day
 - Municipal Facility Inspection
 - Construction Site Inspection



Tennessee MS4 Audit – Pandemic Style

- Hamilton County MS4 Program Audit, Sept 2020
 - ▣ Prep Work
 - It's Complicated!
 - Work through Check List
 - Files Requested 1 Week in Advance
 - IT System Check for Virtual Meeting
 - Preparing Field Staff



Tennessee MS4 Audit – Pandemic Style

■ Many Files Requested in Advanced

- Shared on FTP Site
- Backup on USB Drive
- Signed Ordinances from Nine (9) Jurisdictions most difficult

1. Ordinance(s) or other regulatory mechanisms (IDDE, Construction, Post-Construction, Buffers) (Signed and dated if available)
2. Enforcement Response Plan (ERP) (If not part of the Ordinance)
3. Public Information and Education (PIE) Plan
4. Monitoring Plan

The following documents should be available during the audit, but would be helpful if they can be submitted in advance also:

1. Public education/outreach records
2. Public participation/involvement records
3. IDDE SOP (if available), including IDDE Plans and Procedures
4. Storm Sewer System Map
5. IDDE reports, responses and resolutions
6. Complaints inventory, tracking, and investigation records
7. CGP (and other) plans review and approval procedures (including any checklists)
8. CGP Inspection SOP (procedures and checklists)
9. Stormwater Control Measures (SCM) plans review and procedures (including any checklists)
10. SCM inspection SOP - maintenance procedures, reports, documentation
11. Municipal Facility operation and maintenance plans and procedures
12. Applicable employee training documentation
13. BMPs for special conditions waters
14. Monitoring program description
15. Determination of activity/control measure effectiveness - Annual Report preparation



Robert Karesh - Statewide Stormwater Program
William R. Snodgrass TN Tower, 11th Floor
312 Rosa L. Parks Ave
Nashville, TN 37243
615-235-5402

Tennessee MS4 Audit – Pandemic Style

- ▣ Virtual Review
 - Screen Shares of Examples
 - Show and Tale
 - Q&A from Checklist

INPUT FORM					
SR#	Date	Time	Rec'd By	Last Name	First Name
665	1/22/2019	12:30 PM	TARA	Stover	Heather
Street Number	Address	City	Home Phone	Work Phone	
3985	Sycamore Cove Lane	Apison	770-6055		
Problem Street Number	Problem Street Name	Documentation			
Information Provided	<input type="checkbox"/> COMPLAINT	<input type="checkbox"/> REPORT	<input checked="" type="checkbox"/> INQUIRY	RELATED INPUT #	
Heather called about erosion from construction behind her home. She is in Bentwood cove and Johnson Branch is in her back yard. She stated the construction is causing the creek and her yard to erode. Thanks					
Referred To:	<input type="checkbox"/> SW Dept	<input type="checkbox"/> ENGR Roads	<input type="checkbox"/> WWTA	<input type="checkbox"/> Highway Dept	
<input checked="" type="checkbox"/> Illicit Discharge					
Detailed Location of Problem					



Tennessee MS4 Audit – Pandemic Style

□ Hamilton County MS4 Program Audit, Sept 2020

□ Field Inspection with Staff

■ Facility Site Selection & Prep

- Larger Facility
- Inspection Practice
- SP3 Plan in Place?

■ Facility Site Audit

- IS SP3 Plan Followed?
- We use Survey123



2:39 34%

survey123.arcgis.com/share

Buildings

	Yes	No	N/A
Are floor drains located in buildings? *	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Are loading docks onsite? *	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Are stormwater inlets at these docks? *	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Are paint booths or other special application areas onsite? *	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Storage Tanks

Above ground storage tanks on site? *

Yes

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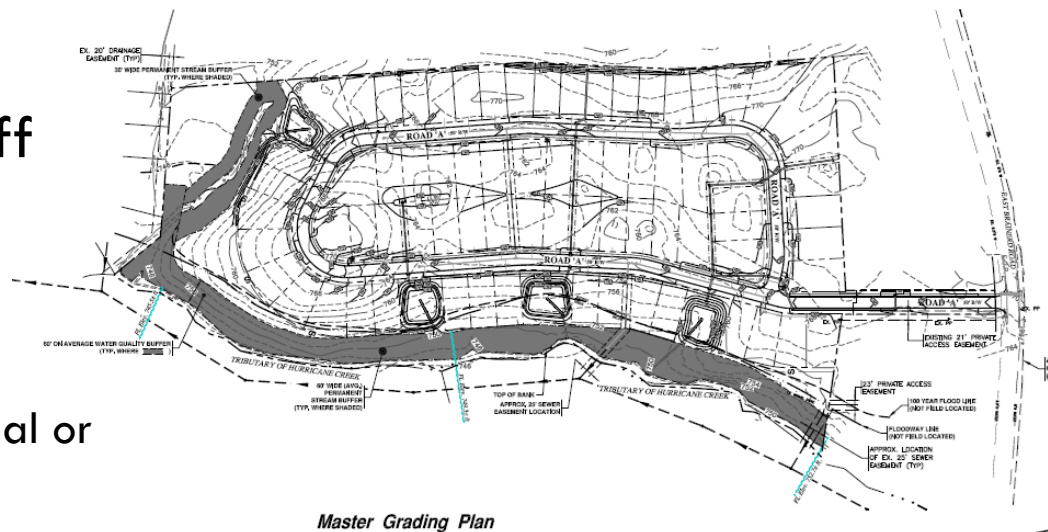
□ Hamilton County MS4 Program Audit, Sept 2020

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■ Construction Site Selection

- Sediment Basin
- Stream Buffer
- Located within Exceptional or Unavailable Waters

■ Make Sure Files are Up-to-Date



Tennessee MS4 Audit – Pandemic Style

□ Hamilton County MS4 Program Audit, Sept 2020

▣ Field Inspection with Staff

■ Construction Site Audit

- Review Process
- Inspection
- Follow-Up Action Correspondence

MCM 4 - CONSTRUCTION SITE REVIEW <i>Evaluation of inspector's competency</i>		
Inspectors names:	Site:	Site:
Level 1 numbers:	TNR	TNR
Inspector reviews approved plans required on site?		
Inspector walks the entire site?		
Inspector inspects all points of discharge?		
Inspector evaluates EPSCs and buffers?		
Waste management practices evaluated?		
Non-stormwater discharges identified?		
Violations identified correctly?		
Are inspection findings documented?		
Inspection findings presented to site contact?		
How are compliance issues addressed?		
Is a compliance deadline given?		
Any education shared with the site contact?		
Notes: _____		

Tennessee MS4 Audit

□ Lessons Learned

- Be SMART with the NOI
 - Know your Milestones
- Use the Checklist (or ask for one)
- Prepare Materials Ahead of Time
- Do a Run-through with Staff
- Perform Annual Self-CEIs
- Build a Good Relationship with State Regulators
- **Audits don't stop for a Pandemic**
- Breathe! (with a mask on and 6ft away)



Thank you!



Crystal Bishop, CPMSM

Stormwater Manager

Hamilton County Water Quality

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423-209-7851