Topics

- Regulatory Overview
- Town’s Ordinance
  - Differences
- Common Mistakes SWPPP
- Inspections
- Common Mistakes – Implementation
- Final Stabilization
- Questions
Regulatory Overview

Federal Regulations/EPA

State Regulations/ADEQ

Local Municipality Regulations

Operators
Regulatory Overview

• Town of Marana - Phase II Small Municipal Separate Storm Sewer System (MS4)

• Developed Stormwater Management Program by March 2003

• Comply with MS4 General Permit – Six Minimum Control Measures
  – Title 25 of the Land Development Code
• Internal draft developed in December 2006
• Series of internal meeting to discuss draft beginning in January 2007
• Workshop held February 3, 2007
  – Solicited stakeholder feedback and comments
  – Received 140 comments
• Presented to SAHBA SWPPP Subcommittee February 13, 2007
Ordinance Background Cont’d

• Addressed all comments received
• Sent out response to comments and revised draft June 2007
• Revised draft to Town Attorney’s office June 2007
• Adopted September 2007
• Revised April 2008 after reissuance of ADEQ AZPDES Construction General Permit
Ordinance Overview

- Prohibition of Non-Stormwater Discharge to the MS4
  - Includes exemptions

- Operating Facilities or Activities
  - Any facility regulated under the Arizona Pollutant Discharge Elimination System

- Construction Sites
  - Over 1 acre in size or part of a common plan of development
  - Includes exemptions
Ordinance Overview (cont’d)

- Stormwater Pollution Prevention Plans
  - Process for submittals and Town reviews
- Maintenance of Stormwater Facilities
  - Requirements for reporting
- Inspections
  - Private and public construction projects
- Enforcement and Penalties
  - Tiered approach
  - Provides for civil and/or criminal penalties
Town Ordinance Differences

• Town does not accept waivers
• Town requires protection basins with a retention component
  – Applies to permanent basins that are used as temporary sediment basins during construction
Operator Responsibilities

- Prepare a site-specific Stormwater Pollution Prevention Plan (SWPPP)
- Submit to the Town of Marana for review and approval
- Submit NOI
  - Copy of authorization to Town
- Implement Best Management Practices (BMPs)
- Submit Notice of Termination (NOT)
  - Copy of acknowledgement to Town
SWPPP Review - Common Mistakes

- Not site-specific
- Only sediment controls identified and not erosion controls as well
- References 2003 CGP
- Excessive BMPs – wrap your site in silt fence
- Inadequate BMPs identified in concentrated flow areas
- Incorrect certification statement
Inspections

• Town inspects each construction site at least once during the active construction period

• Based on inspection, Town will follow-up with:
  – Letter of Compliance
  – Notice to Correct
  – Notice of Violation
  – Stop Work Order
Enforcement

• Actions since October 2007
  – 48 sites inspected
  – 35 Notices to Correct
  – 13 Notices of Violation
  – 1 court case with fines
Common Mistakes On-Site

• SWPPP Document
  – Location of SWPPP
  – Records not up to date
    • Field modification changes
    • Inspection records
Common Mistakes On-Site

- BMPs
  - Improperly Installed
  - BMPs installed in the wrong locations
    - On top of hills
    - In 404 washes
    - In concentrated flows
- Good housekeeping
- Lack of signage
SWPPP Sign
Silt Fence installation
Silt Fence in concentrated flow
Straw Wattle in concentrated flow
Check Dam – Sand Bags in concentrated flow
Check Dam – Sand Bags in concentrated flow
Filter SOXX – Not maintained
Final Stabilization

• Must have the following to Submit NOT:
  – Final stabilization achieved on all portions of the site
  – Another operator assuming control
  – for residential construction - transfer to HOA or homeowner

• Submit NOT acknowledgement to Town
Questions

• What’s wrong with this Picture?