MS4 Self-Assessment

Post-Construction Site Runoff Program

Module 4

Name of the Permittee: City of San Antonio	MS4 Permit Number: WQ0004284000
Assessment Period:	

Permittee Instructions: Please complete the worksheet below. Please note that upon opening this Module, some content may be disabled such as the capacity to check inside the "boxes." The content can usually be activated by pressing "Enable Content" which will appear below the Toolbar in "MS Office."

Not Required on Existing Permit

ATTACHMENTS REQUESTED	Document attached
1. Attach a blank checklist or form used to review post-construction site plans.	☐ YES ☐ NO
2. Attach a blank a checklist or inspection report form used to inspect post-construction sites.	☐ YES ☐ NO
3. Attach five inspection reports, each one completed for different construction sites, inspected within the reporting period, by the permittee to determine compliance with state/municipal requirements. Submit with each report, photos of the construction sites and any violations that were found.	☐ YES ☐ NO
4. Attach a copy of no more than five issued enforcement actions for storm water post-construction violations.	☐ YES ☐ NO
5. Attach a copy of no more than five corrective actions submitted by violators to address a storm water enforcement action.	☐ YES ☐ NO
6. Attach an organizational chart.	☐ YES ☐ NO
7. Attach a flow chart that illustrates how the enforcement plan is implemented.	☐ YES ☐ NO

POST-CONSTRUCTION SITE RUNOFF **Control Measure to ensure that the permittee addresses storm water runoff at the completion of new or redevelopment sites that disturb at least one acre.**	
1. In accordance with 40 CFR §122.26 [Phase I] and 40CFR § 122.34(a) and 40 CFR § 122.34(b)(5) [Phase II], has the permittee developed a *Storm Water Management Program (SWMP),* that describes how the **Post-Construction Site Runoff** Control Measure will be implemented?	☐ YES ☐ NO
2. What pollutants of concern are targeted for reduction through the implementation of the **Post-Construction Site Runoff** program?	
Response	
ORGANIZATIONAL STRUCTURE	
1. Is there a storm water team in place to ensure that the **Post-Construction Site Runoff** program is properly implemented?	☐ YES ☐ NO

2. Describe the organizational structure and staff responsibilities necessary to implement the **Post-Construction Site Runoff** program. Include the name, title, contact information, department name and key responsibilities of each team member.	
Response	
3. What co-permittee(s) or interagency departments will participate in the implementation of the **Post-Construction Site Runoff** program?	
Response	
4. Describe any formal agreements and key areas of responsibility shared by the permittee, co-permittee(s) and or interagency departments in the implementation of the **Post-Construction Site Runoff** program.	
Response	
5. Do program participants *(e.g., permittee, co-permittee(s), and other departments)* meet regularly to discuss the progress of the **Post-Construction Site Runoff** program?	☐ YES ☐ NO
6. Describe the frequency of these meetings.	
Response	
LEGAL AUTHORITY	
1. Does the permittee have legal authority to implement the **Post-Construction Site Runoff** program?	☐ YES ☐ NO
2. What ordinances, codes, or policies provide this legal authority?	
Response	
3. Does this legal authority grant the permittee capacity to require that all new development and significant redevelopment projects incorporate Best Management Practices (BMPs) and submit a plan that complies with design standards, zoning codes and comprehensive or master plans?	☐ YES ☐ NO
4. Does the ordinance outline the contents of an approvable plan and responsibilities for operation and maintenance of approved BMPs?	☐ YES ☐ NO
5. Does the ordinance describe who is responsible for inspections and maintenance *(e.g., the homeowners association, permittee, etc.)?*	☐ YES ☐ NO
6. Does the legal authority address post-construction requirements for all projects disturbing one acre or more?	☐ YES ☐ NO
7. Does the legal authority require site design, source control, and storm water treatment BMPs?	☐ YES ☐ NO
8. Who *(e.g., specific staff, department, etc.)* has the authority to enforce the ordinances and inspect post-construction sites?	
Response	

FISCAL RESOURCES		
1. What is the budget for the implementation of the **Post-Construction Site Runoff** program?	**REPORTING PERIOD**	**NEXT REPORTING PERIOD**
	Response	**Response**

SECTION I: MEASURABLE GOALS	
1. What are the Measurable Goals for the **Post-Construction Site Runoff** program? Include expected quantifiable results.	
Measurable Goal 1	

Expected Quantifiable Results	
Measurable Goal 2	
Expected Quantifiable Results	
Measurable Goal 3	
Expected Quantifiable Results	
Measurable Goal 4	
Expected Quantifiable Results	

2. Are these Measurable Goals described in the SWMP?	☐ YES ☐ NO

SECTION II: TRAINING/EDUCATION

STAFF

1. Does the permittee require staff *(e.g., storm water team, inspectors, and engineers)* to complete special, continuous, and or annual training or obtain certification or licensing to implement and manage the **Post Construction Site Runoff** program?	☐ YES ☐ NO
2. If yes, describe the applicable training, certification or licensing and the required frequency for each.	
Response	
3. Is there a system in place to notify staff and inspectors when required training is due and does it document the training completion dates?	☐ YES ☐ NO

INSPECTORS

1. Does the permittee provide training for inspectors on the **Post Construction Site Runoff** BMPs, permit requirements, or requirements, and ordinances?	☐ YES ☐ NO

CONSTRUCTION OPERATORS

1. Does the permittee provide training for construction operators on how to properly select, install and maintain BMPs for post-construction activities?	☐ YES ☐ NO
2. Describe the training and educational materials provided by the permittee for construction operators on post-construction BMPs.	
Response	
3. Describe the occasion that the permittee distributes educational materials to construction operators *(e.g., during the review process, inspections).*	
Response	
4. Does the permittee cover these training subjects? *(Check all that apply)*	

• Local and state erosion and sediment control requirements and permits.	☐ YES ☐ NO	**• Proper erosion and sediment control BMP design and installation.**	☐ YES ☐ NO
• Maintenance requirements for BMPs.	☐ YES ☐ NO	**• Permit requirements in the General Construction permit for post-construction state or federal)**	☐ YES ☐ NO

Other, *(Specify)*:	
5. Describe the occasion when training is provided and the frequency.	
Response	
6. Is training required or voluntary for construction operators?	
Response	
7. How many construction operators generally attend the training?	

Response	
8. Describe the consequences for not attending required training.	
Response	
9. Does the permittee require construction site contractors, developers and engineers to attend training?	☐ YES ☐ NO
10. Does the permittee provide post-construction technical guidance to construction operators?	☐ YES ☐ NO
11. Describe this technical guidance and how it is made available to the construction operators.	
Response	

GENERAL PUBLIC

1. Does the permittee provide training and educational materials to educate the public on how to detect problems with post-construction BMPs?	☐ YES ☐ NO
Response	
2. What communication tools such as a web page and telephone hotline are provided to engage the public in reporting problems with post-construction sites?	
Response	

SECTION III: PLAN REVIEW PROCESS

1. What information does the permittee require to help determine that the construction operator complies with post-construction permit requirements? *(Check all that apply)*

•A separate post-construction plan that addresses local storm water requirements.	☐ YES ☐ NO	**•Post-construction storm water controls are described for smaller than one acre sites.**	☐ YES ☐ NO
•Proof that a Notice of Intent has been submitted to the permitting authority to obtain storm water permit coverage for the development site.	☐ YES ☐ NO	**•Proof that a Notice of Termination has been submitted to the permitting authority or proof that termination has been approved after the development site has been completed.**	☐ YES ☐ NO
• The development site discharges to a 303(d) listed impaired water.	☐ YES ☐ NO	**• Each new development and Re-development plan is consistent with the goals of regional concerns such as smart growth initiatives, watershed master plans, and other larger-scale planning efforts.**	☐ YES ☐ NO
• Adequate BMPs are included in plans, details, and drawings; types of standard conditions or notes are also included; maintenance requirements are specified; and the location of BMPs that could hinder maintenance is identified.	☐ YES ☐ NO		
•Other, *(Specify)*:			

SECTION IV: INVENTORY

1. Has the permittee identified its universe of post-construction sites, including sites that disturb less than 1 acre?	☐ YES ☐ NO

SECTION V: EQUIPMENT

1. What fundamental and special hardware *(e.g., vehicles, laptops, special metric instruments)* do inspectors use in the field to inspect post-construction sites?

Response

SECTION VI: POST-CONSTRUCTION SITE INSPECTIONS

1. How many fulltime inspectors are dedicated to inspecting post-construction sites? Also, describe to which extent that other departments, may be involved in conducting these inspections.

Response

2. Describe the inspection plan of post-construction development sites?

Response

3. What percentage of post-construction sites are inspected for compliance?

Response

4. What is the maximum number of inspections conducted for any one post-construction site to determine permit compliance?

Response

5. What do the inspectors look for when conducting post-construction site inspections? *(Check all that apply)* Inspectors look for problems with:	
• **Materials exposed to storm water such as batteries, chemicals, grease and oils.**	☐ YES ☐ NO
• **Spills and leaks left unattended.**	☐ YES ☐ NO
• **Long term storage of oil scrap equipment and other materials.**	☐ YES ☐ NO
• **Trash, floatables and other unmanaged debris.**	☐ YES ☐ NO
• **Unauthorized discharges of facility wash water *(e.g., vehicle or yard)* to the street/storm drain.**	☐ YES ☐ NO
• **Unauthorized discharges of sediment to the street/storm drain.**	☐ YES ☐ NO
• **BMPs integrity to determine that both structural and source control BMPs are functioning properly.**	☐ YES ☐ NO
• **Other, *(Specify)*:**	

SECTION VII: ENFORCEMENT

1. Does the permittee have an enforcement policy that clearly describes the action *(e.g. verbal and written warnings, fines, and "stop work" orders")* to be taken for common violations?	☐ YES ☐ NO
2. Is there an enforcement escalation procedure for violations?	☐ YES ☐ NO
3. Are inspectors authorized to administer enforcement actions for permit non-compliance onsite (cease and desist orders, fines)?	☐ YES ☐ NO
4. Has the permittee issued any escalated enforcement actions for permit non-compliance onsite (cease and desist order, fines)?	☐ YES ☐ NO

Response

5. Describe the type and number of enforcement actions issued this reporting period.

Response

6. Are there limitations of enforcement authority *(e.g., limits on the dollar amount of fines)*?	☐ YES ☐ NO

7. Do inspectors conduct follow-up inspections or phone calls following the issuance and enforcement action, to determine compliance?	☐ YES ☐ NO

SECTION VIII: RECORDS MANAGEMENT

1. Does the permittee have a database in place to track activities of the **Post-Construction Site Runoff** program?	☐ YES ☐ NO
Response	
2. What activities are tracked *(e.g., inspections, follow-ups, enforcement actions, training)* is tracked for the **Post-Construction Site Runoff** program?	
Response	
3. Who has access to this database?	
Response	
5. Who is responsible for updating the database?	
Response	
6. Does the permittee update its SWMP to reflect current change and progress made in the **Post-Construction Site Runoff** program?	☐ YES ☐ NO

SECTION IX: ASSESSMENT

1. Does the permittee assess the effectiveness of the **Post-Construction Site Runoff** program?	☐ YES ☐ NO
2. Based on the results of the effectiveness assessment, describe the positive results of the **Post-Construction Site Runoff** program.	
Response	
3. Based on the results of the effectiveness assessment, what changes are proposed to enhance the **Post-Construction Site Runoff** program?	
Response	
4. Does the permittee have adequate staff and equipment to implement the **Post-Construction Site Runoff** program?	☐ YES ☐ NO
5. Does the permittee assess the **Post-Construction Site Runoff** program to determine if it meets Measurable Goals and other indicators?	☐ YES ☐ NO
6. Does the permittee assess the **Post-Construction Site Runoff** program's compliance with the permit requirements?	☐ YES ☐ NO
7. Does the permittee generate an assessment report of the **Post-Construction Site Runoff** program for its records?	☐ YES ☐ NO
8. What departments are involved in the **Post-Construction Site Runoff** program assessment?	
Response	

Completed by (Print Name): Arthur Reinhardt		
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