


Water Board Inspections of Municipalities' Stormwater Programs

Expectations of Water Board Staff
for Industrial and Commercial
Business Inspections

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Purpose of Inspection

Determine the municipality's compliance with its Previous Stormwater Permit and the Municipal Regional Permit (MRP) adopted October 2009.



Compliance with Previous Permit

- Urban Runoff Management Plan
 - Inspection Plan for businesses
 - Prescribes frequency of inspection for each type of business and guidelines on how to conduct inspections
- Review inspection forms/reports/database for compliance with Urban Runoff Management Plan
 - Quality of forms/reports/database
 - Observations, violations, deficiencies, enforcement, follow-up

Compliance with MRP

Review Enforcement Response Plan (ERP), Business Inspection Plan and inspection forms/reports/databases to determine compliance with MRP

- Quality of forms/reports/database
 - Observations, violations, deficiencies, enforcement, corrective action verification/return to compliance

Quality of Inspection Reports

- Observations – Notes on what the inspector saw during inspections. Some inspectors write reports based on their notes. Inspection forms/check lists guide inspectors through facilities during the inspection.
- Violations/Deficiencies – Notes the location and nature of each violation/deficiency. Some inspectors take pictures.
 - Water Board business inspectors deem all violations, deficiencies, and issues as violations
 - Inconsistency and ambiguity in the way Permittees define violations
 - Will be working with BASMAA in the coming weeks to better define violations

Quality of Inspection Reports, Cont.

- Appropriate Enforcement – Type of enforcement taken. Permittee's ERP details the different enforcement levels, along with scenarios for each level and procedures for escalation of enforcement
- Appropriate Corrective Action Verification/Return to Compliance – Clearly indicates when correction action was verified. MRP correction goal is within 10 business days.
 - Re-inspection or photo documentation from the business

Filling out C.4. in the Annual Report

C.4.c.iii.(2) ► Frequency and Types/Categories of Violations Observed	
Fill out the following table or attach a summary of the following information.	
Type/Category of Violations Observed	Number of Violations
<u>Actual</u> discharge (e.g. non-stormwater discharge)	
Potential discharge (e.g. BMPs not in place or ineffective)	

“Actual” or illicit discharge – includes active and historical discharges