

MS4 Enforcement U.S. EPA Region 6

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Overview

- What is a MS4?
- Types of MS4s
- EPA Region 6 MS4s
- Audit Checklist
- Facilities Assessed
- Enforcement Actions
- Completed Enforcement Initiatives
- Future Enforcement Initiatives



What is a MS4?

- Municipal Separate Storm Sewer System
- Municipality permitted under a MS4 permit
- Municipality with a storm drain conveyance system



Types of MS4s

- Phase I
 - Municipalities with population greater than 100,000
- Phase II
 - Municipalities with population less than 100,000
- Permits reduce pollutants before the discharge reaches drainage system



EPA Region 6 MS4s

- Phase I = 35
 - Arkansas 1
 - Louisiana 4
 - New Mexico 1
 - Oklahoma 2
 - Texas 27
- Phase II = 375 plus



Audit Checklist

- Developed by Region 6 in 2003
- Used Nationally to assess MS4 Storm Water Management Programs (SWMPs)



Facilities Assessed

- 2004 City of Houston
- 2005 City of Beaumont
City of Lubbock
City of Shreveport
- 2006 City of Amarillo
North Texas Toll Way Authority
City of Plano
City of Waco and Waco TXDOT
City of El Paso
City of Tulsa, Turnpike Authority
and OKCDOT



Facilities Assessed

- 2007 Arkansas State Highway
Univ. of Texas Arlington
City of Arlington
City of Corpus Christi
City of Baton Rouge
City of Albuquerque
Oklahoma City, Turnpike
Authority and OKCDOT
- 2008 City of Abilene



Facilities Assessed

- 2009 City of Arkansas
City of Dallas
- 2010 City of Irving
- 2011 City of New Orleans
- 2012 City of Garland
City of Jefferson Parish
City of Fort Worth and Tarrant
County



Facilities Assessed

- 2013 City of Pasadena
City of Laredo
- 2014 TXDOT Dallas
Port of Houston Authority
City of Mesquite
- 2015 City of San Antonio
City of Austin
Austin TXDOT



Facilities Assessed

- 2016 Beaumont TXDOT
 Houston TXDOT
 City of Baton Rouge



Enforcement Actions

- City of Houston
 - Administrative Order for failure to properly staff their SWMP
- City of Mesquite
 - Administrative Penalty Order for failure to fully implement their SWMP



Enforcement Actions

- City of Baton Rouge
 - Administrative Penalty Order for failure to fully implement their SWMP; develop measureable goals; and provide resources and staff



Completed Enforcement Initiative

- 2003 – Developed the MS4 Audit Checklist
- 2004 – Piloted the MS4 Audit Checklist
- 2009 – EPA/TCEQ collaborated to validate operators storm water permit and approved SWPPP
- 2010 – Reviewed MSGP compliance at auto salvage facilities





Completed Enforcement Initiative

- 2014 – Streamlined the audit process with the implementation of the MS4 Self-Assessment



Future Enforcement Initiatives

- 2017 – Survey randomly selected construction sites, to determine the impact of utility companies and BMPs
- or, complete assessment of Phase I MS4s



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