

It's Time to Implement a Common Sense Solution to Efficiently Manage Data for MS4 Permit Requirement Compliance

"I just passed my MS4 DEP compliance inspection with no comments," is the phrase that municipal managers and public works departments would love to say. Getting to that sweet spot is getting more difficult as new, more complicated regulatory compliance requirements go into place in 2018. 2017 is the last year where progress reporting of compliance activities is due on a bi-annual basis. In 2018, reporting on Minimum Control Measures, Pollutant Reduction Plans and TMDL Plans progress becomes annual, requiring the following (at a minimum):



- An inventory of all assets
- Documented inspections of assets
- Maintenance records
- Maintenance and storage of all forms of documentation to prove Best Management Practices (BMP) are CURRENTLY in place.

The most important part of that last requirement is "<u>currently</u>." At this stage, planning to put those practices in place may not pass muster with the DEP during an inspection, even in 2017. You will need to demonstrate comprehensive tracking of MS4 assets and permit compliance activities – in some form – and a paper or spreadsheet-based approach for that much information is just not practical. A user-friendly solution is needed to efficiently manage the mapping, data and field reports to avoid potential issues in a stronger regulatory environment.

For many of our clients, using TRAISR for MS4 Permit compliance has been a natural progression from straight asset management, such as signs, guiderails, permitting, work orders, etc. Once they saw the capabilities, and realized the depth of information required by the DEP, they have explored the flexibility of the solution to encompass MS4 reporting requirements.

What Agencies Need in an MS4 Management Solution

Management, mapping and tracking of assets is key for MS4 Permittees to compile proper compliance activity documentation.

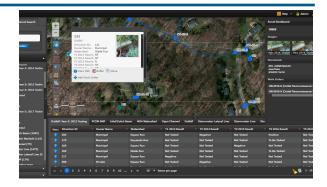
- Infrastructure mapping
 - Catch basins/Inlets
 - Manholes
 - Storm pipes (flow direction mapping)
 - PCSM BMPs (Detention Basins, Rain Gardens, Underground Tanks, etc.)
 - Conveyance Swales
- Mobile data collection including video, images and documentation

Additionally, for MS4 Permit requirements, agencies are looking for software to manage and provide tracking and reporting of compliance activities such as the following:

- Maintenance and screening of municipal outfalls
- Maintenance and inspections of municipal inlets and conveyance
- Inspections and maintenance of municipal and private PCSM Best Management Practices (BMPs)
- Illicit discharge and construction site runoff complaints
- Construction site erosion and sedimentation control inspections
- Total Maximum Daily Load (TMDLs) Plan and PRP Compliance — Tracking of constructed BMPs, achieved pollutant reductions and annual maintenance activities



An efficient solution for MS4 permit compliance would provide GIS-based inventory data that will help municipal staff officials account for, and report on, practice compliance. It needs to monitor existing stormwater management practices and analyze for vulnerable areas. It should also identify potential locations for implementing new stormwater BMPs. Additionally, it should be used to help plan budgets for maintenance components and overall system planning.



Collecting Data Takes Time

As you can imagine, included in this is the need to gather and enter a massive amount of data that will need to be stored and recalled efficiently. This can be a very time consuming part of this whole process and should be a strong motivation for moving on a solution in the near term.

The good news is, once it's there, it's there, but you have to feed it first. Assembling this material to avoid data gaps can be an arduous task, and that's where an experienced implementation team can make all the difference in the world. Having a partner who knows exactly what is needed at the beginning of the process can help avoid critical delays in the actual go-live of the solution, and its usability in the face of an impending inspection.





Flexing into Unforeseen Benefits

The great news is, once an MS4 solution is up and running, you can look at other ways it can be applied to bring efficiencies to your operations. One of our clients in Western Pennsylvania realized that the solution could be customized to include dye testing, for on-site sewer systems. They created a lateral testing program that fully automated location status, plumber notification, and staff sign-off status.

This information was then used as an additional demonstration point to the DEP to show they were actually going above and beyond what was currently being required of their operations.

Time is of the Essence

It cannot be stressed enough that implementing an automated solution for MS4 Permit compliance is no longer a choice of <u>IF</u> it should be implemented, but <u>WHEN</u> and <u>HOW</u> fast. The grace period for these solutions being in place grows exponentially shorter by the month. With permit renewals occurring in 2017 for most municipalities, and the added PRP, TMDL and pollution control requirements of the upcoming 2018 NPDES MS4 Permit, an organized, efficient system of tracking and documenting assets and permit compliance activities is essential. To maintain proper documentation, and avoid a last minute scramble if called for a DEP Inspection or in preparing your progress reports, we recommend working with a software partner who has demonstrated proficiency with MS4-related applications and making this a true priority for your organization.

TRAISR—More Than Just MS4

SCALABLE | CUSTOMIZABLE | TRANSPARENT

The MS4 permit solution is one element of TRAISR. It can be part of a wider, local agency asset & infrastructure management solution.

TRAISR can be used to instantly access vital data about roadways, bridges, sewer/pipe systems, utilities signs, signals, property and other agency inventory, fleet operations, fiber and other assets. It also enables streamlining of code enforcement, work orders, maintenance, risk assessment, reporting, budgeting and forecasting.

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