

LAS VEGAS VALLEY STORMWATER QUALITY PROGRAM



- Overview of the Stormwater Quality Program
- 2014 Audit Summary

Overview



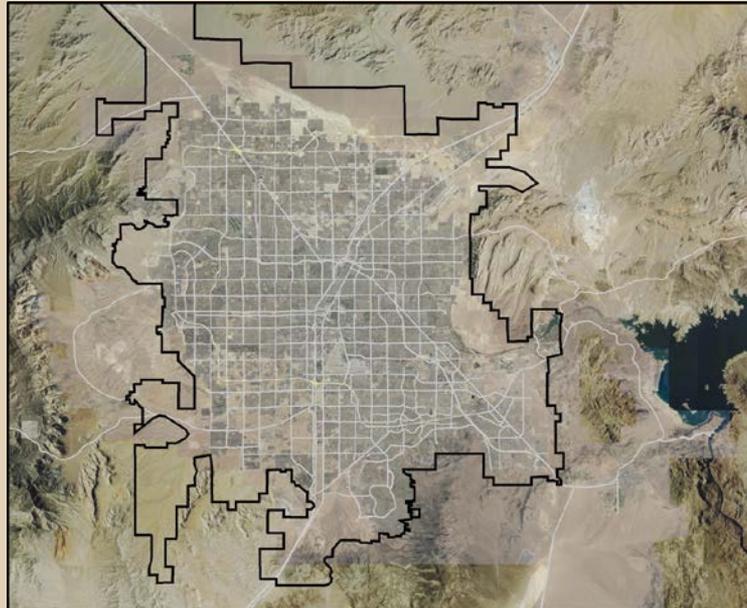
NPDES
MS4
Permit



- Required by the Clean Water Act as part of the National Pollutant Discharge Elimination System (NPDES)
- Issued a Municipal Separate Storm Sewer System (MS4) Permit in 2010
- Authorizes stormwater discharges into waters of the U.S. from urbanized Las Vegas Valley
- Address non-point source pollution

History

- First permit was issued in 1991
- Currently operating under the fourth permit
- Covers the developed area of the Las Vegas Valley
- Program has expanded substantially since inception



Permit
Compliance
is a
Partnership



**United States Environmental
Protection Agency (EPA)**



**Nevada Division of Environmental
Protection (NDEP)**



**Stormwater Quality Management Committee
(SQMC)**

Henderson

Las Vegas

North Las Vegas

Clark County

Regional Flood

Consultant



**Other
stakeholders**

CCRFCD Role

- Coordinating agency for Permit implementation; no inspection or enforcement authority
- Chair the Stormwater Quality Management Committee, implement public outreach, oversee wet weather water quality monitoring
- Fund maintenance of regional flood control facilities, including those with water quality features and maintain contract with outside consultant

Permittees Role

- Enact and enforce ordinances
- Train employees
- Implement street sweeping and maintain storm sewer system
- Maintain municipal industrial facilities
- Implement/inspect Best Management Practices (BMPs)
- Inspect construction and industrial sites
- Implement public education programs

2014 Audit



Potential Permit Violations



NDEP identified Potential Permit Violations in six areas:

- Legal authority
- New development and significant redevelopment
- Stormwater budget documentation
- Illicit Discharge Detection and Elimination
- Industrial Facility Monitoring and Control
- Inspection of Construction Sites

NDEP identified Areas Needing Improvement in the following areas:

- Public Outreach and Education
- Mapping
- Training
- MS4 Monitoring and Maintenance

Areas
Needing
Improvement



Collaborative Response



- Permittees met with NDEP on a monthly basis during audit response process
- Collaboration was very positive
- Staff anticipates that the audit response will be completed by the end of Spring 2017
- Negotiations to develop a new permit are expected to begin mid 2017

Program Improvements



- Permittees committed to implement a series of actions to address key audit findings
- Joint understanding between NDEP and the Permittees that substantial completion of submittals would forego the need for a more formal compliance instrument
- Permittees have been working since late 2015 to develop and implement program deliverables
- Agreed to six major deliverables

Stormwater
Quality
Management
Committee



- Permittees agreed to amend the interlocal agreement forming the SQMC
- Reconstitute the SQMC to be staffed by management-level representatives from each of the Permittees
- Institute more frequent reporting requirements

Deliverables
Accepted by
NDEP



- General information about program implementation, including:
 - Public outreach and education
 - New Development and Significant Redevelopment
 - Drop inlet inspections
 - Wet weather monitoring
- Clarification of legal authority through ordinances
- Revised checklists for construction and industrial inspections
- Revised training modules for construction inspections, industrial inspections, illicit discharge detection and elimination (IDDE) investigations and storm channel inspections

Practices for Inspection of Construction Sites in the Las Vegas Valley



Practices for Inspection of Industrial Facilities in the Las Vegas Valley





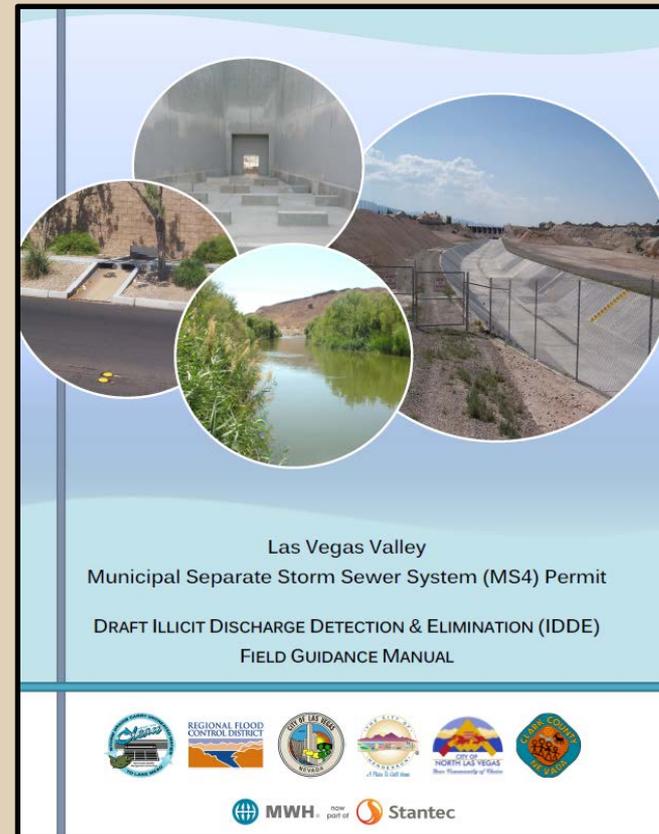
Storm Channel Inspection and Illicit Discharge Complaint Response

FIELD INSPECTOR TRAINING



- IDDE Field Guide
- Wash Walk Field Guide
- Schedules for completion of refresher training for all applicable staff

Deliverables
Accepted by
NDEP



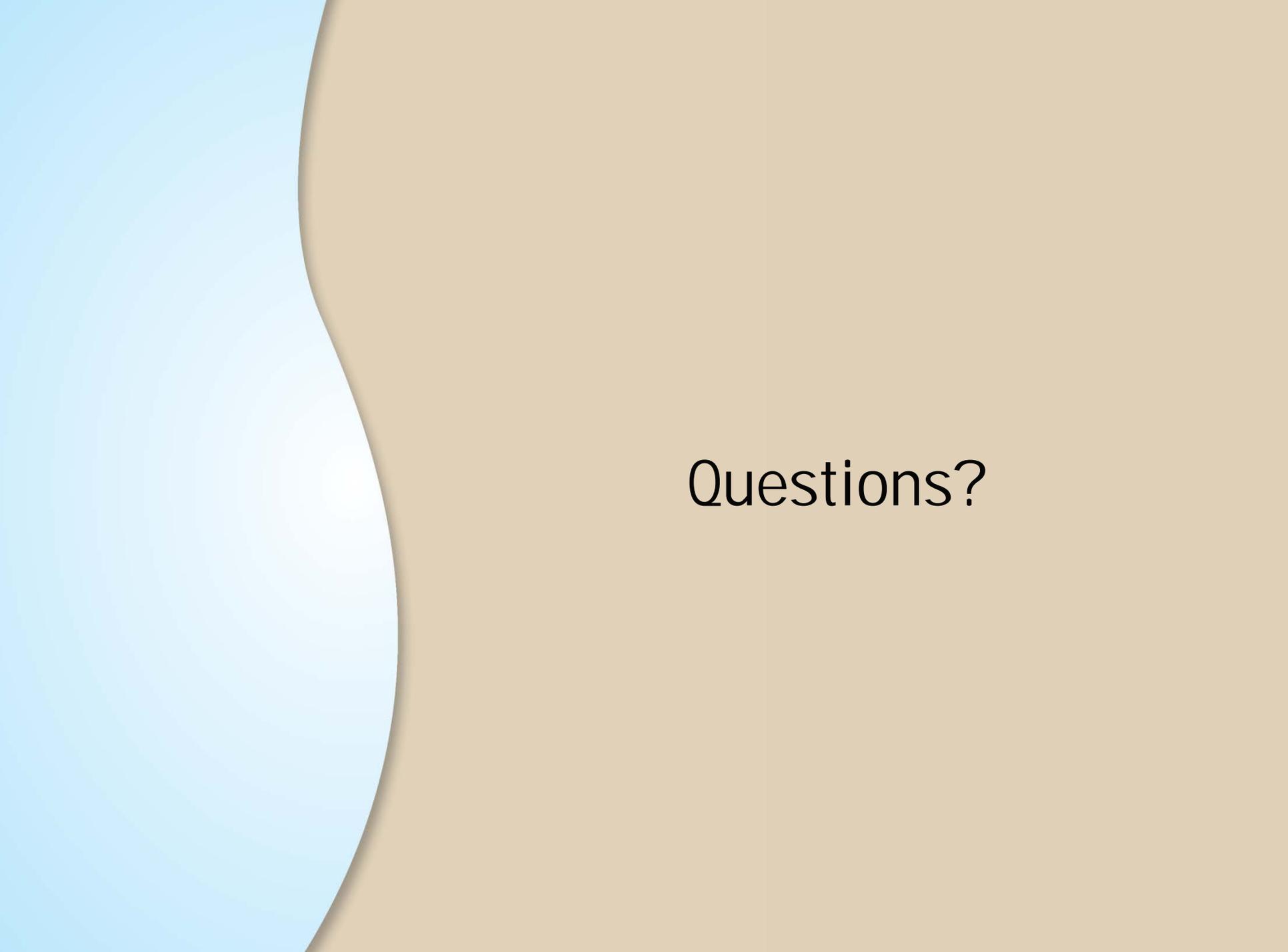
Deliverables
Accepted by
NDEP



- Enforcement response procedures for construction, industrial and IDDE inspection programs
- Case study/example of how the enforcement response procedures have been implemented
- Facility Management Plans
- Records Retention Policies
- List of industrial facilities subject to inspection by the Permittees

Conclusion

- Las Vegas Valley Stormwater Program is robust and effective
- Southern Nevada's unique environment emphasizes regional over site-based approaches
- Foundation of stormwater management is the regional flood conveyance and detention system
- No evidence that water quality is being impaired by stormwater
- Permittees are committed to continuous improvement of the stormwater program



Questions?