

BOARD OF SUPERVISORS

MADISON COUNTY, MISSISSIPPI

Department of Engineering/Road Management
Dan Gaillet, P.E., County Engineer/ Road Manager

3137 South Liberty Street, Canton, MS 39046
Office (601) 855-5670 FAX (601) 859-5857

MEMORANDUM

November 1, 2017

To: Sheila Jones, Supervisor, District I
Trey Baxter, Supervisor, District II
Gerald Steen, Supervisor, District III
David Bishop, Supervisor, District IV
Paul Griffin, Supervisor, District V

From: Dan Gaillet, P.E.
County Engineer and Road Manager *DG*

Re: NPDES Phase II Stormwater Program

The Engineering Department recommends acknowledging receipt of the MS4 Stormwater Report from Mississippi Department of Environmental Quality and the County's response to MDEQ's findings.

SHEILA JONES
District One

TREY BAXTER
District Two

GERALD STEEN
District Three

DAVID BISHOP
District Four

PAUL GRIFFIN
District Five

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From: Dan Gaillet, P.E.
County Engineer and Road Manager 

Re: NPDES Phase II Stormwater Program

The Engineering Department recommends acknowledging receipt of the Stormwater Program Report from Allen Engineering and Science.

SHEILA JONES
District One

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STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
GARY C. RIKARD, EXECUTIVE DIRECTOR

September 29, 2017

Mr. Dan Gaillet
Madison County Board of Supervisors
PO Box 608
Canton, MS 39046

Dear Mr. Gaillet:

Re: Inspection Report
Madison County Board of Supervisors, MS4 Stormwater Management
Program
Canton, Mississippi
Madison County
GP-MS4 Permit No. MSRMS4031

Enclosed is a copy of the MS4 Inspection report completed as a result of this office's inspection at Madison County Board of Supervisors, MS4 Stormwater Management Program on September 1, 2017. The report should be used by you as a guide for complying with requirements and limitations stated in your permit.

Please respond in writing within 10 days of the receipt of this report to the apparent deficiencies listed in the report regarding any immediate remedial actions taken to assure future compliance with permit requirements and detailing the Madison County Board of Supervisors plan to correct them.

If you have any questions concerning this matter, please contact me at (601) 961-5094.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Rucker".

Jamon Rucker
Municipal and Private Facilities
Environmental Compliance and Enforcement Division

Agency Interest No. 17845
INS20170001

COPY



**Mississippi Department of Environmental Quality
Office of Pollution Control
Water Compliance Inspection Report**

Site Name: Madison County Board of Supervisors, MS4 Stormwater Management Program

Permit Number(s): GP-MS4 Permit No. MSRMS4031

Physical Address

Canton, MS 39046
Madison County

Mailing Address

PO Box 608
Canton, Mississippi 39046

Evaluation Type: MS4 Inspection

Date of Evaluation: 09/01/2017

Facility Type: Municipal

Inspection Participants: Jamon Rucker, MDEQ
Danny Lee, Madison County Road Manager
Paul Lanning, Allen Engineering and Science

Purpose of Inspection

To determine Madison County's compliance status with its NPDES Storm Water permit.

Permit Status

Madison County was granted coverage under Mississippi's Small Municipal Separate Storm Sewer System (MS4) Storm Water General NPDES Permit. The date of coverage began February 2, 2010, and the permit is set to expire on December 31, 2018.

Facility Description

Madison County is covered under Mississippi's Small Municipal Separate Storm Sewer System (MS4) Storm Water General NPDES Permit in order to discharge storm water from small storm sewer systems, owned and operated by Madison County MS4 Storm Water Management Program, into receiving streams of the Pearl River, Big Black River, Ross Barnett Reservoir and numerous tributaries, creeks, streams, and lakes in Madison County.

Inspection Summary

On September 1, 2017, I met with representatives of Madison County to evaluate the compliance status of the County's MS4 Storm Water permit. A records review was conducted, along with field observations. A review of the Storm Water Management Program (SWMP) from years 2010- present was performed but a thorough review of 2016 was conducted. Required documentation of compliance with its measurable goals as outlined in the SWMP was produced for years 2010 - 2016. We began the inspection with a site inspection of examples of the county's construction sites in process, detention ponds (privately owned) and the public works facility work yard.

Site Inspections

1. The first site visited was the Western Ridge Subdivision which is categorized as a large construction site located in the unincorporated community of Gluckstadt, MS. At the time of the inspection, the area had been divided into individual lots for future construction of residential homes. There were four homes that construction had started on or were near completion. Two of the homes had removed their silt fences for the application of sod, but were delayed due to recent rain events. There was evidence of sediment alongside the curb of the property, but Mr. Lee indicated that the property would have the sod installed soon to prevent any more sediment entering the streets and potentially into the storm drains. The detention pond that is located in the subdivision was in good condition and there were no signs of sediment or visible sheen on the pond surface. While the construction of homes continues the contractor of the subdivision is responsible for the upkeep, operation, and maintenance of the detention pond until a Home Owners Association is established which is indicated in the contracts of the homes and through the Madison County Board of Supervisors.
2. The next site inspected was the White Oak Subdivision at the corner of Kaden & Cooper Landing in Gluckstadt. The construction site of this single family home is under the category of small construction. Silt fences were installed properly and being maintained and at the time of the inspection there were no signs of sediment leaving the site.
3. The next site inspected was the Capitol Body Shop located on Calhoun Station Parkway in Gluckstadt. The construction site of this business is under the category of small construction. Silt fences and erosion controls were installed and properly maintained.
4. The last area we visited was the county's maintenance yard. Oil changes are performed on site and inside of the maintenance building. An outside contractor collects the used oil. Documentation of this is kept at the facility. Also located inside the building is an area for used batteries. There are no dumpsters located outside of the building. Recently, a containment area was constructed for the oil containers in the maintenance building to prevent possible leakage in the building's storm drain. The diesel and gasoline tanks on site are double-walled tanks.

The county has two areas where equipment is washed that discharge to an oil and water separator before being discharged to the sanitary sewer. The equipment is stored under a shed to prevent oil and dirt from washing off and potentially entering the storm water system.

On the side of the property the County has road material stockpiled. There is no containment in the front part around the road material. This area could be an issue and should be identified and evaluated as part of the storm water pollution prevention plan of the county-owned sites.

File Review

After the site review, a review of the Storm Water Management Program (SWMP) and the Best Management Practices (BMPs) was performed, and a review of the County's Annual SWMP Report was conducted. Our office noted the following:

Public Education and Outreach

BMP – Storm water education for local citizens/developers/engineers and restaurant owners: Madison County provided and distributed storm water protection education pamphlets/brochures information to local libraries, county buildings, and kiosks at local parks. This information can also access from Madison County website.

BMP – Offer presentations and events to support storm water education for local schools: Madison County went throughout the Madison County School District in conjunction with the Madison County Soil and Water Conservation District to achieve this goal. Provided to the children were handouts, posters, and live presentations; as well as other media. **Make sure to record the visits to each of schools that these presentations are given.**

Public Involvement and Participation BMP

BMP–Hold public meetings to receive input on the implementation of the program: The County proposed to hold annual public meeting. For the year of 2016, this meeting didn't occur. It was conducted on January 17, 2017, due to legal issued with the former company that handle and assisted Madison County with the MS4 stormwater program that dealt with recovering MS4 information after the company was released from its duty. Allen Engineering was hired August 2016, to implement and assist with the program, but was able to conduct this meeting due to time constraints. Madison County indicated that another meeting would be conducted to the requirements for the year 2017. **Make sure that the meeting is conducted to satisfy the requirements with holding annual public meetings.**

BMP-Regulate and enforce current ordinance adopted by Madison County. Public input in compliance with/updating of ordinances: Madison County has a current ordinance in place however Madison County is in the process of revising their ordinances and is scheduled to become official in 2017, that had public input from the public was sought.

BMP-Perform stream clean up and monitoring: Madison County Road Department performs this task. The department cleans the ditches through complaints and timely scheduling.

Illicit Discharge Detection and Elimination

BMP- Storm Drainage Map: The Madison County GIS department is continuing to enter collected information for updating the storm drainage mapping.

BMP-Identify illicit connections through dry weather screening/elimination of illicit discharges: The Madison County Road Department performs this task of dry weather screening is conducted mainly on a complaint driven basis and monitor major stream/road crossings. Allen Engineering and Science conducted a dry weather screening audit on 12/27/2016, at twenty-six locations throughout the county and a report was sent to the county.

BMP- Identify illegal dumping areas: The County has placed signs at problem dump sites. Planning and zoning as well as code enforcement performs this task. Allen Engineering and Science conducted a dry weather screening audit on 12/27/2016, and noted several areas that illegal dumping appeared to be occurring.

BMP- Identify failing septic systems. The County no longer approves any construction projects that propose using septic tanks. CMU, Bear Creek, and the Pearl River Valley Water Supply District are the wastewater providers in the county. If MCRD employees notice a major issue they will contact a supervisor so the proper entity can be notified to address the issue.

BMP- Inform county employees, the public and businesses on illegal dumping: Signs were placed at various, high trafficked creek crossings around the county to inform the public about illegal dumping.

BMP- Ordinance: Madison County has a current ordinance in place however Madison County is in the process of revising their ordinances and is scheduled to become effective in 2017.

Construction Site Runoff

BMP -Training of County personnel and contractors: Allen Engineering and Science staff provided training session for Madison County employees at the county road department on October 3, 2016. On June 8, 2016, Allen Engineering and Science conducted training for contractors dealing with Best Management Practice (BMP) and etc.

BMP- Mandatory pre-construction meetings/review of construction plans: Madison County Engineering Department conducts pre-construction plan and specs reviews before plans can be approved.

BMP-Madison County issued Construction Site Storm Water Runoff Control Site Specific SWPPP: Planning and Zoning Department performs the task that's checked multiple times through the construction phase.

BMP -- Periodic Inspections: The County relies on a storm water inspector and building inspectors to monitor construction activity. The county inspectors conduct schedule inspections during the construction phases before they allow continue with construction.

BMP-Ordinance: Madison County has a current ordinance in place however Madison County is in the process of revising their ordinances and is scheduled to become effective in 2017.

Post Construction Runoff

BMP -- Maintain Structural BMPs: The County stated that it does not own or maintain any detention ponds or structural runoff controls. The contractor of a subdivision is responsible and maintains the detention ponds or structural runoff controls until a Home Owner Association (HOA) is establish. The County generally looks at post-construction controls within the County at least annually.

BMP- Hold annual Post Construction Field Inspections: The County requires a letter of credit or bond to ensure the developer maintains storm water and construction integrity.

BMP – Post Construction Ordinance: The County has a comprehensive storm water ordinance in place.

BMP – Education for Developers/the Public: The County conducted training on June 8, 2016 and November 15, 2016, with several local builders/developers/construction company representatives.

BMP – Assess Fee: Fees are not assessed to the developer or builder for the sole purpose of BMP maintenance.

Pollution Prevention / Good Housekeeping

BMP – Training of County Personnel: BMP -Training of County personnel and contractors: Allen Engineering and Science staff provided training session for Madison County employees at the county road department on October 3, 2017.

BMP – Improvements in County Operations – The County has made improvements that were recommend by Allen Engineering and Science and continue to identify possible improvements where needed in county operations.

Conclusions

There are several areas of concern noted throughout this report which should be corrected or a plan put in place to prevent the issues from recurring.

1. There was evidence of sedimentation noticed alongside of the curb of the property in the Western Ridge Subdivision that potentially could enter the storm water system. Storm water silt fencing should have been up until sod would be applied to the area.
2. There is no containment in the front access area around the road material. This area could be an issue and should be identified and evaluated as part of the storm water pollution prevention plan of the county-owned sites.
3. For the BMP of offering presentations and events to support storm water education for local schools, make sure to record the visits to each of the schools where these presentations are given.
4. The 2016 public meeting to receive input on the implementation of the program wasn't conducted. The meeting was conducted on January 17, 2017, to use for the 2016 requirements for the meeting. Madison County is still going to conduct another public meeting before the year is up to satisfy the requirements for 2017.

Signature: _____



Date: _____

9/29/2017

Photos / Other Attachments



Figure 1: Silt Fencing applied to Large Construction Area (Western Ridge Subdivision)



Figure 2: Sod Application to be done.



Figure 3: Signs of Sedimentation from unexpected rain event.



Figure 4: Western Ridge Subdivision Detention Pond



Figure 5: Kaden and Cooper Lane (Small Construction)



Figure 6: Silt Fencing at Kaden and Cooper Lane



Figure 7: Capitol Body Shop Construction Site



Figure 8: Storm water prevention applications. (Capitol Body Shop)



Figure 9: Silt Fencing (Capitol Body Shop)



Figure 10: Silt Fencing (Capitol Body Shop)



Figure 11: Containment area for the oil containers in the maintenance building



Figure 12: Oil Containers



Figure 13: Equipment Wash Area



Figure 14: Equipment Wash Area



Figure 15: Water and Oil Separator

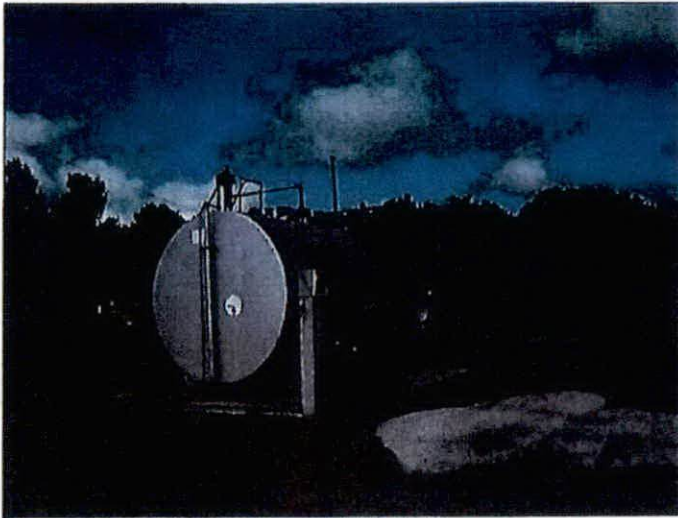


Figure 16: Fuel Tanks (Doubled Walled)

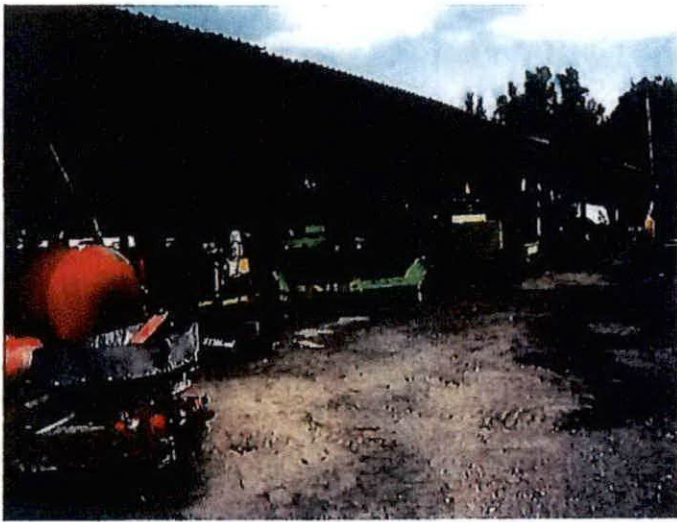


Figure 17: Stored Equipment Area Under Shed



Figure 18: Stored Equipment Area Under Shed



Figure 19: Road material stockpile

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Department of Engineering/Road Management
Dan Gallet, P.E., County Engineer/ Road Manager

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October 9, 2017

Mr. Jamon Rucker
Municipal and Private Facilities
Environmental Compliance and Enforcement Division
Mississippi Department of Environmental Quality
P.O Box 2261
Jackson, MS 39225-2261

RE: Madison County Board of Supervisors, MS4 Stormwater Management Program
Inspection Report
Ref. No. MSRMS4031

Dear Mr. Rucker:

Madison County received the Inspection Audit (dated 09/29/2017) on October 4, 2017 that lists the noted deficiencies with our Small Municipal Storm Sewer System (MS4) program. In response, our corrective actions are listed below:

1. Issue:

There was evidence of sedimentation noticed alongside of the curb of the property in the Western Ridge Subdivision that potentially could enter the storm water system. Storm water silt fencing should have been up until sod would be applied to the area.

Response:

Madison County will hold a Contractor/Developer Training on November 7, 2017 from 9:00 to 11:00 am at the Madison County Board Room. The majority of the training will cover proper installation and maintenance of erosion and sediment control practices, especially silt fencing.

2. Issue:

There is no containment in the front access area around the road material. This area could be an issue and should be identified and evaluated as part of the storm water pollution prevention plan of the county-owned sites.

Response:

Madison County will hold an employee training on November 9, 2017 at the Madison County Road Department Facility. A portion of the training will focus on best management practices employees should follow throughout the facility to ensure materials are stored correctly. Additionally, Madison County will evaluate and, if needed, modify how the road material is stored at the facility.

3. Issue:

For the BMP of offering presentations and events to support storm water education for local schools, make sure to record the visits to each of the schools where these presentations are given.

SHEILA JONES
District One

TREY BAXTER
District Two

GERALD STEEN
District Three

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PAUL GRIFFIN
District Five

Response:

Madison County will work with the Madison County Soil and Water Conservation District to ensure that they record the visits to each of the schools where presentations are given.

4. *Issue:*

The 2016 public meeting to receive input on the implementation of the program wasn't conducted. The meeting was conducted on January 17, 2017, to use for the 2016 requirements for the meeting. Madison County is still going to conduct another public meeting before the year is up to satisfy the requirements for 2017.

Response:

Madison County will hold a public meeting on November 6, 2017 in the Madison County Board Room. This meeting will start at 9 am and will be open to the public.

Should you have any questions, please do not hesitate to contact me at (601) 790-2520.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Gaillet', written over a circular stamp or seal.

Dan Gaillet, P.E.

Madison County Engineer and Road Department