

INDUSTRIAL STORMWATER DISCHARGE MONITORING PROGRAM ANNUAL PROGRAM FEES

ARS000002

Part 6.2.9

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BRIEF PROGRAM OVERVIEW

- Based on the City's MS4 permit requirement
- The goal of the program is to ensure specific industrial facilities comply with their IGP requirements
- This is a separate requirement from construction runoff control
- Managed and administered by the Public Works Department
- The program does not aim to add extra compliance or sampling and analyzing requirements to facilities



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CITY CODES

Amended Chapter 29 to include Article VII:
“Industrial Stormwater Discharge Monitoring
Program”

Ordinance No. 22,544

Approved by the City of Little Rock Board of
Directors on November 4, 2024



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WHERE CAN I FIND MORE DETAILS?

www.littlerock.gov/government/city-departments/public-works/civil-engineering-division

City's website

All departments ➡ Public Works ➡ Civil Engineering
Industrial Stormwater Discharge Monitoring Program



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WHO DOES THE PROGRAM APPLY TO?

- a) Facilities currently holding an Industrial General Permit (IGP) issued by DEQ (based on SIC or NACIS categories)
- b) Facilities that the City of Little Rock Public Works Department determined contribute a substantial pollutant load to its MS4
- c) SARA sites (facilities that store, use or release specific hazardous or toxic chemicals above the legal limits)
- d) operating or closed **municipal landfills**
- e) treatment, storage, or disposal **facilities for municipal waste**; and
- f) **hazardous waste treatment facilities**

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COMPONENT OF THE PROGRAM

1. City to maintain an **inventory** of facilities
2. **Inspection** of facilities
3. Non-compliance **enforcement**
4. **Parameter monitoring** verification

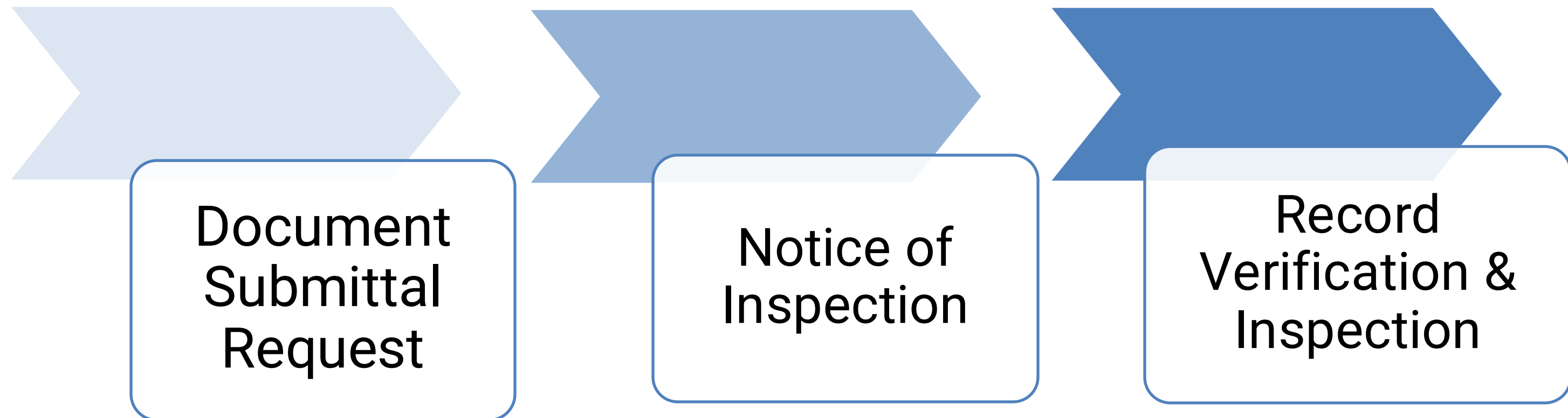


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INSPECTION PROCESS



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INSPECTION

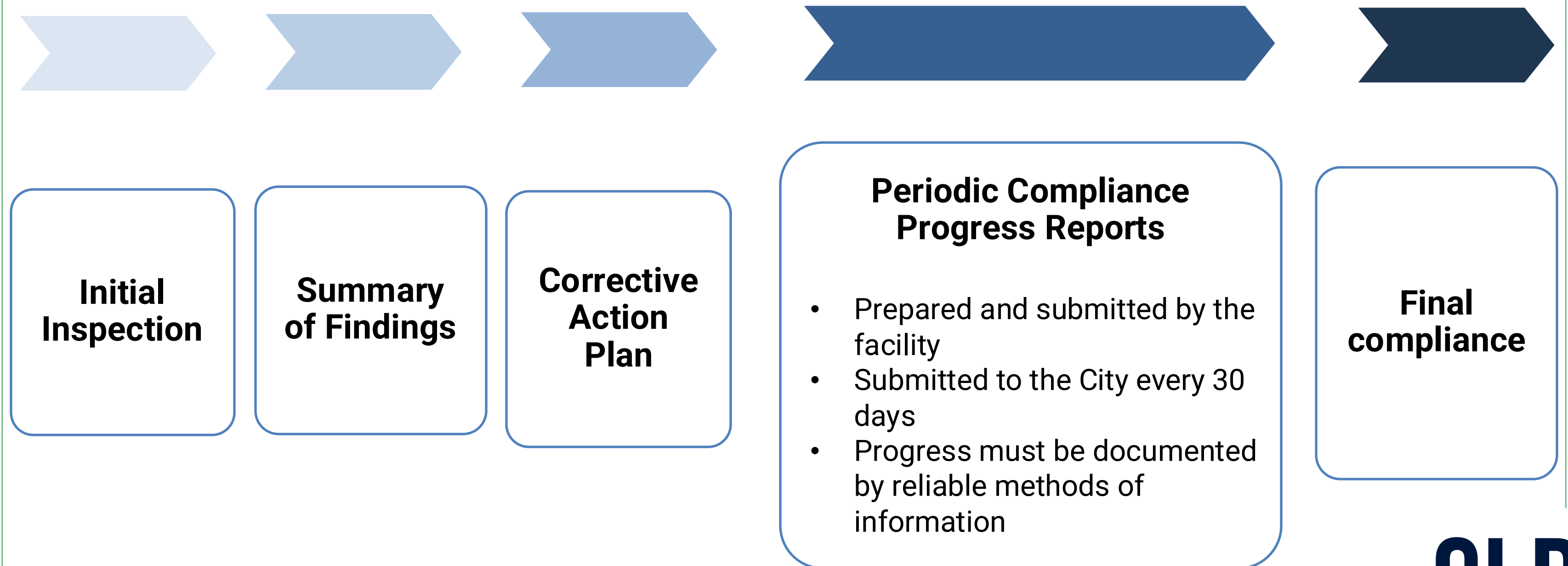
A routine inspection has the following goals

- Establish communication between the industrial facility and City staff
- Verify the facility's IGP compliance status
- Verify the adequacy of information submitted to DEQ by the facility
- Ensure all of the facility's sampling and monitoring requirements are met
- Identify where possible corrective action plan must be implemented

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ENFORCEMENT PROCESS



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WHEN WOULD THE PROGRAM START?

- Proposed start date is January 1st, 2027
- Facilities will be notified of their document submittal and inspection dates



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HOW DOES THE CITY FUND THE PROGRAM?

- DEQ does not provide funding to cover operative expenses of the program
- Public Works Department must self-fund its compliance with the new DEQ industrial monitoring requirement
- Current Public Works Department funding cannot legally be utilized to fund the program
- The City must establish a **fee system** to cover the operational expenses of the Industrial Stormwater Discharge Monitoring Program

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WHAT ARE THE ANNUAL FEES BASED ON

Each facility's fee is based on the potential damage of what an unpermitted discharge would cause to the downstream ecosystem and the City's MS4.

Each facility will be charged a fee suitable to its unique conditions.

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HOW FEES ARE DETERMINED

The following factors are considered:

- **The area of the facility grounds**
- **Facility's distance to a non-designated waterbody**
- **Facility's distance to a designated waterbody**
- **Number of outfalls**
- **Special permit conditions**
 - No Exposure Exclusion facilities
 - Underground or above ground storage tanks
 - EPA Hazardous Waste Permit

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PAYMENTS AND INVOICING

- The program is proposed to **start in 2027**
- **Annual fee**
- Invoices for the first year will be sent out once the program is established in the City's financial system
- Billing, invoicing and payment collections will be administered by the **Finance Department**
- Going forward **payment due notices** will be sent out in **October** of each year
- **Payments will be due by January 1st of each year**

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HOW CAN FEES BE PAID?

- Fees should be paid to the City of Little Rock Treasury Management Division either by mail, in person, or over the phone.
- To pay by phone using a card, call 501-371-4566
Processing fee is 3% plus \$1.00
- Pay by check:
Payable to: City of Little Rock
500 W Markham St, Room 100
Little Rock, AR 72201

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DELINQUENCY OF PAYMENT

- Payments become **past due after 45 days** of the due date
- **Penalty of 10%** will be added
- If payment is not received within a subject year, it will be added to the next year's annual fee with penalties

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FUTURE PAYMENTS

- **Annual 4% increase** to count for the estimated annual economic growth
- Fees shall be **evaluated every 5 years** to ensure they cover all expenses
- Facilities may appeal their assessed fees after receiving their first bill by a written letter to the Director of Public Works (attention of the Environmental Compliance Engineer)

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QUESTIONS?



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