Section III
Storm Sewer Monitoring Plan

MODIFIED CONSENT DECREE SECTION XVI, PARAGRAPHS 47 – 53, 57c. STORM SEWER MONITORING PLAN

Paragraph 47: States the purpose of the Storm Sewer Monitoring Program is to provide baseline data on the presence of sewage indicating pollutants in the East Bank drainage system before and after RMAP implementation in each drainage basin. Stormwater sampling will be done to accomplish this purpose.

Work Accomplished in a previous year:

- As a requirement of the Consent Decree, the Board established a Storm Sewer Monitoring Program (SSMP) designed by EPA to provide baseline data on the presence of sewage in the East Bank drainage system. In April 1998, the Sewerage and Water Board hired ADS Environmental Services (ADS) to conduct stormwater sampling pursuant to the regimen dictated by the Consent Decree.

Paragraph 48: Sets the schedule for Phase I and Phase II sampling. Phase I sampling will commence within 180 days of lodging. Six (6) quarterly samples will be taken within a two (2) year period. Phase II sampling will be initiated following remediation of sewerage basins, which are contained within the drainage basins, which are tributary to each drainage pumping station. Commencing no later than 180 days after completion of remediation of all sewage basin(s) within an individual drainage pump station basin, the Board shall collection six (6) quarterly samples over eight quarters. The program will continue until Remedial Measures Action Plans have been completed in all sewage basins and final drainage basin sampling is complete.

Work Accomplished in a previous year:

- Samples for the third quarter of the program (first quarter, 1999) were collected on January 9, 1999. They were collected between six and twelve hours following the specified rainfall event.

- Samples for the fourth quarter of the program (second quarter, 1999) were collected on May 11, 1999. They were collected between six and twelve hours following the specified rainfall event.

- Samples for the fifth quarter of the program (third quarter, 1999) were collected on July 20, August 9, and September 2, 1999. They were collected between six and twelve hours following the specified rainfall event.

- Samples for the sixth quarter of the program (fourth quarter, 1999) were collected on October 8, 1999. They were collected between six and twelve hours following the specified rainfall event.

- An additional sample collected on March 8, 2000, at DPS 10 to satisfy sixth quarter sampling requirement. This station was resampled due to an unusable sample collected in the first quarter of the program at this Drainage Pumping Station.

Paragraph 49: Requires the Board to conduct all sampling and analysis in accordance with EPA approved methods under 40 C.F.R. Part 136, or where EPA methods do not exist, in accordance with the latest edition of the Standard Methods for the Examination of Water and Wastewater.

Work Accomplished in a previous year:

- The Board conducted all sampling and analyses in accordance with EPA approved methods under 40 C.F.R. Part 136, except for caffeine. In the case of caffeine, no appropriate EPA approved method exists. These samples were analyzed by the HPLC method according to the latest edition of Standard Methods for the Examination of Water and Wastewater.

Paragraph 50: Requires the Board to analyze samples for fecal coliform, fecal streptococcus, enterococcus, and caffeine.

Work Accomplished in a previous year:

- A sample was taken at DPS 10 on March 8, 2000 to replace a sample taken at this location in the first quarter of the program. The previous sample was discarded because it did not meet requirements set forth in the Consent Decree. The sample was analyzed for fecal coliform, fecal streptococcus, enterococcus and caffeine. The sample satisfies the sixth quarter program sample for this location.

Paragraph 51: Requires the Board to monitor Station 3, Station 6, Station 7, Station 10, Station 14, and Station 16.

Work Accomplished in a previous year:

- The Board has previously taken samples at each Drainage Pumping Station listed in Paragraph 51. A sample to replace the voided sample for the first program quarter at Station 10 was collected on March 8, 2000.

Paragraph 52: Requires Phase I sampling to begin within 180 days of lodging of the original Consent Decree and lists the following requirements for samples:

a) Water samples must be taken on the discharge side of each drainage station which pumps into Lake Pontchartrain at location(s) that yield samples representative of the water pumped during the period.

Work Accomplished in a previous year:

- The Board commenced the SSMP sampling program when it contracted with ADS in April 1998. ADS began the preliminary work necessary to collect and analyze samples at the required locations. This included sample site inspections, laboratory coordination and technician training. Sampling began on September 1, 1998, within 180 days of lodging of the Consent Decree.

b) Samples shall be taken between 6 and 12 hours following a rainfall event of approximately 1" or more over a 24 hour period measured at each drainage pump station.

Work Accomplished in a previous year:

- All samples were collected in accordance with the requirements of this section.

c) Sample volume, preservation and holding times will be in accordance with 40 C.F.R. 136 or, where EPA methods do not exist, in accordance with the latest edition of Standard Methods for the Examination of Water and Wastewater. Samples shall be taken in each of six (6) calendar quarters for a period of two years (8 quarters) unless the specified rainfall event does not occur in the quarter. If the specified rainfall event does not occur during said quarter, the Board is exempt from performing said testing.

Work Accomplished in a previous year:

- All sample volumes, preservation and holding times were in accordance with 40 CFR Part 136 with the noted exception of caffeine. A sample was collected at DPS 10 to satisfy the sixth quarter sample required for this location, as required by the Consent Decree.

d) The results of Phase I sampling shall be tabulated and submitted to EPA within 90 days following the end of the two year (8 quarter) period. The report shall include the date and location of all sampling, the associated 24-hour rainfall measurement, and the results of the analyses for the specified parameters.

Work Accomplished in a previous year:

- The results of the Phase I sampling were tabulated and submitted to EPA within 90 days of the end of the two-year monitoring period, on January 19, 2001, as required by the Consent Decree.

Paragraph 53: Requires Phase II sampling to begin within 180 days following the completion of the RMAP for all sewage basin(s) within a drainage system pumping station basin. This shall continue until all pump stations identified in Paragraph 51 are sampled. Phase II sampling requirements are listed as follows:

a) The Board shall take water samples on the discharge side of the drainage pump station(s), which are used to drain the geographic area of the sewage basin, remediated in the RMAP. Sample locations will be the same as those used in Phase I.

b) The sampling protocol in Paragraph 52b and 52c shall be used.

c) The results of each Phase II sampling period shall be submitted to EPA within 90 days after completion of the two year (8 quarter) sampling period for the affected drainage basin. The report shall include identification of the drainage pump station sampled and the sewage basins associated with that station, the date and location of all sampling, the associated 24 hour rainfall measurement and the results of analyses for the specified parameter.

Work to be Accomplished:

- Phase II of the Storm Sewer Monitoring Program will commence within 180 days of completion of the Remedial Measures Action Plan (RMAP) for all sewerage basins that are within the drainage system pumping station basins that are required to be sampled although the original completion dates will be changed. The work in the sewage basins was scheduled to be completed no later than December 31, 2006. The parties are currently negotiating a new completion date, yet to be determined.

Paragraph 57c: Requires the Board to report its Storm Sewer Monitoring Plan activities in the annual report in accordance with Section XVI.

Work Accomplished:

- The Board has met the requirement to report its Storm Sewer Monitoring Plan activities.