

US EPA ARCHIVE DOCUMENT

2012 MS4 ERP Summary Report

Baseline and Post-Certification Inspection Results

A total of 100 baseline (6/6/2008 to 10/22/2009) and 51 post-certification (6/6/2011 to 10/22/2012) field inspections were conducted by OCTA, OWR and URI.

The baseline data presented in Table 1 show that compliance rate performance for selected indicators (N=17) ranged from 30% (p₁, EBPI B2) to 81% (p₁, EBPI D5) in 2008/2009. With USEPA-HQ funding and stakeholder input, URI and OTCA developed a comprehensive Environmental Results Program (ERP) workbook and checklist; the checklist contains 17 EBPI Y/N questions across the following environmental categories: DEM general permit conditions, RIPDES construction general permit administrative conditions, erosion and sediment control conditions, other controls checklist, and post construction stormwater management. Following baseline inspections, two statewide workshops were held in 2010 and 2011; workbook and checklist certification materials were then mailed to all regulated entities.

In 2011/2012, 51 post-certification follow-up inspections of randomly selected facilities were conducted. Comparison of the post-certification audit data to baseline data (using Fisher's exact test) found that 10 of 17 indicators (or 59%) showed significant improvement in regulatory compliance across all four measurement categories; i.e., P value $\leq .05$. Using the Simes modified Bonferroni adjustment procedure for multiple comparisons, significant improvements in 5 (29%) indicators (B1, B2, C2, C6, and C8) remained, Table 1. The average observed improvement in performance for these 5 indicators was 34%.

Conclusion: The analysis of field inspection data collected by OCTA, OWR and URI showed that statistically significant improvements in environmental performance were achieved by applying the ERP model to this industry sector.