



USEPA "Protocol for Conducting Environmental Compliance Audits under the Stormwater Program" for Small MS4s (Phase II MS4)

Minimum Control Measure (MCM) Summaries (SWMP describes the process for...)

MCM #1 (Public Education)

- Plans to inform individuals/ households about reducing stormwater pollution
- Plans to inform individuals/groups about involvement with the stormwater program
- The target audiences and why they are selected
- The targeted pollutant sources
- The outreach strategy and methods that will be used to reach targeted audiences
- The number of people expected to be reached by the strategy in permit term
- Who is responsible for management and implementation of the program/BMPs
- How the success of the minimum measure will be evaluated
- How the measurable goals were selected

MCM #2 (Public Involvement/Participation)

- How the public was involved in NOI submittal and SWMP development
- The plan for public involvement in program development and implementation
- The target audiences for the involvement program including ethnic and economic groups
- Person(s) responsible for the management and implementation of the program/elements
- The types of public involvement activities including, where appropriate:
 - Citizen representatives on a local stormwater management panel, public hearings, citizen volunteers to educate other individuals about the program, and volunteer monitoring
- How success of minimum measures are evaluated
- How measurable goals were selected

MCM #3 (Illicit Discharge Detection & Elimination)

- How a storm sewer map is or will be developed and how it will be updated
- The regulatory mechanism that will be used to prohibit discharges (i.e., ordinance) including:
 - Why the mechanism was chosen
 - A description of the plan to develop the mechanism or copy of relevant sections if already developed
 - A description of the plan to ensure compliance of this regulatory mechanism through enforcement procedures and actions
- A plan to detect and address illicit discharges including:
 - Dry weather screening for non stormwater flows, field tests of selected chemical parameters, and a mechanism to address on-site sewage disposal systems that flow into the storm drainage system
- and procedures for:
 - Locating priority areas, tracing source of discharges (including techniques), removing the source of the illicit discharges, and program evaluation and assessment
- A plan to inform public employees, businesses, and the general public of the hazards of illegal discharges and improper disposal (including how this will coordinate with public education, pollution prevention/ good housekeeping)
- Person(s) responsible for management and implementation of the program/BMPs
- How success of minimum measures are evaluated
- How measurable goals were selected

MCM #4 (Construction Site Stormwater Runoff Control)

- The regulatory mechanism that will be used to require erosion and sediment controls at construction sites (i.e., ordinance) including:
 - Why this mechanism was chosen, a description of plan to develop the mechanism or copy of relevant sections if already developed, a description of the plan to ensure compliance of this regulatory mechanism through sanctions and enforcement, and description of procedures for when certain sanctions are used
- Requirements for operators to implement erosion and sediment control BMPs and control waste at construction sites that may impact water quality (concrete truck washout, chemicals, litter, etc.)
- Procedures for site plan review incorporating consideration of potential water quality impacts including:
 - Description of procedures and rationale for identifying sites for plan review (if not all reviewed) and estimated number and percentage of sites with plan review
- Procedures for receipt and consideration of information submitted by the public
- Procedures for site inspection and enforcement of control measures including prioritization of sites for inspection
- Person(s) responsible for management and implementation of the program/BMPs
- How success of minimum measures are evaluated
- How measurable goals were selected

MCM #5 (Post-Construction Stormwater Management)

- Specific priority areas to be addressed in the program
- How program is specifically tailored to the local community (minimize water quality impacts, maintain pre-development conditions)
- Structural (wet ponds, filtration practices, infiltration practices, etc.) and non-structural (policies or ordinances, educational programs, etc.) BMPs included in the program
- The mechanism that will be used to address post-construction runoff (i.e., ordinance)
 - Why the mechanism was chosen and a description of plan to develop the mechanism or copy of relevant sections if already developed
- How the long-term operation and maintenance (O&M) of BMPs will be ensured
- Person(s) responsible for management and implementation of the program/BMPs
- How success of minimum measures are evaluated
- How measurable goals were selected

MCM #6 (Good Housekeeping)

- A description of the O&M program to prevent or reduce pollutant runoff from municipal operations including:
 - Municipal operations impacted by the O&M program and a list of municipally-owned industrial facilities discharging to the MS4 that are subject to industrial stormwater permitting (including permit number or industrial NOI)
- Any government employee training program used to prevent/reduce stormwater pollution from municipal activities including:
 - A description of exiting materials used and description of how the training program is coordinated with public information and illicit discharge minimum measures
- A program description addressing:
 - Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables/ pollutants to the MS4, controls for reducing or eliminating discharges from streets, parking lots, storage yards, etc., procedures for proper disposal of waste removed from MS4 and municipal operations, and procedures ensure flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection
- Person(s) responsible for management and implementation of the program/BMPs
- How success of minimum measures are evaluated
- How measurable goals were selected