SWMP GUIDANCE

for Updating Your Storm Water Management Program (SWMP)
to Comply with Ohio EPA General NPDES Permit for Small MS4s #OHQ000003

This document has been developed to guide you through the process of renewing your community's National Pollutant Discharge Elimination System (NPDES) permit that authorizes discharges from your small municipal separate storm sewer system (MS4). Ohio EPA administers this program through a general permit system, meaning a single NPDES permit is issued by the agency and regulated small MS4s are required to apply for coverage under that permit. The general permit, like all NPDES permits, is renewed once every five years and can contain new requirements or new minimum performance standards. This checklist is designed to help you bring your Storm Water Management Program (SWMP) into compliance with NPDES General Permit #OHQ000003 issued on September 11, 2014.

Renewing NPDES Permit Coverage

When Ohio EPA renews the general permit, regulated communities are required to renew their permit coverage by submitting a Notice of Intent (NOI) or Co-Permittee NOI, as applicable. Some communities are separately permitted and have elected to develop and implement their own SWMP. Other communities have decided to work together from a common SWMP or share resources and are permitted as a group. In a group permit situation, the term "MS4 Permittee" refers to the administrator of the group MS4 permit, e.g., Summit County & Others. The term "Co-Permittee" refers to the individual group member, e.g., Copley Township.

Regulated communities are only required to implement the SWMP within urbanized areas of the community. The urbanized area was initially based on the 2000 U.S. Census, but can expand with each future decennial census. Thus, your urbanized area may have expanded as a result of the 2010 Census. Once an area is designated as being an urbanized area, it remains a part of the regulated portion of your community. Thus, to determine the regulated portion of your community, you must overlay the urbanized area from the 2010 Census onto the urbanized area from the 2000 Census. A map of urbanized areas is available at http://www.neohiostormwater.com in the work shop materials for "How to Revise Your Storm Water Management Program to Address TMDLs".

On September 22, 2014, Ohio EPA sent out renewal notices to all existing permittees. The notice required communities to submit an NOI or Co-Permittee NOI, as applicable, by December 22, 2014. If your community has not submitted an NOI or Co-Permittee NOI, as required, your community is in violation of Ohio Revised Code 6111.04 for discharging municipal storm water without authorization and may be subject to enforcement. Your community will need to submit an NOI or Co-Permittee NOI, as applicable, to return to compliance. If you are a co-permittee of a group of MS4s, Ohio

EPA prefers that you provide an original, signed Co-Permittee NOI to the MS4 Permittee, who will in turn submit the Co-Permittee NOI on your behalf, along with the NOI for the group permit. NOIs, Co-Permittee NOIs and instructions can be found on Ohio EPA's website at: http://www.epa.ohio.gov/dsw/permits/GP_MS4StormWater.aspx.

In response to the submittal of an NOI, your community or MS4 Permittee should have received an authorization letter confirming coverage under NPDES Permit #OHQ000003. This letter will contain the Facility Permit Number. The Facility Permit Number is an identification number specific to your community or group. In NE Ohio, the Facility Permit Number begins with the sequence "3GQ". Ohio EPA recommends that you maintain a copy of the authorization letter with the SWMP. A copy of the SWMP and authorization letter should be maintained by permittees, including co-permittees.

Question	Yes	No
Did you renew NPDES permit coverage by submitting a Notice of Intent (NOI) or Co-Permittee NOI, as applicable, to Ohio EPA or MS4 Permittee?		
☞ **Required Action:** If you answered "No", you must submit an NOI or Co-Permittee NOI to Ohio EPA.		

Newly-Regulated MS4s as a Result of 2010 Census

If your community or non-traditional MS4 is newly-regulated as a result of expansion of the urbanized area due to the 2010 Census, Ohio EPA will notify you when and how to apply for NPDES permit coverage. You are not obligated to submit an NOI (or Co-Permittee NOI) until you receive notification and instructions from Ohio EPA. Ohio EPA anticipates that this will occur before the end of 2015.

As with any MS4, the SWMP is only required to be implemented within the urbanized area of your community. Newly-regulated MS4s may wish to partner with existing MS4s as a co-permittee. This will commit you to implementing a common SWMP or sharing resources with the group with which you are partnering.

Non-traditional MS4s are publicly-owned or operated separate storm sewer systems at parks, universities, community colleges, military bases, hospitals, prison complexes and highway systems, but excludes very discrete areas such as individual buildings. Thus, non-traditional MS4s are required to obtain coverage if they operate a system of conveyances from a grouping of buildings, roads or parking lots such as on a college campus. If the only source of municipal storm water in the urbanized area is runoff from a single building facility, e.g., a downtown administration building, a non-traditional MS4 operator will not be required to seek coverage.

Updates to Storm Water Management Program (SWMP)

For existing permittees, there are four key updates that must be made to your community's SWMP to comply with NPDES Permit #OHQ000003. These updates include:

1. Review/add best management practices (BMPs) to ensure SWMP addresses U.S. EPA-approved Total Maximum Daily Load (TMDL) recommendations for identified water quality problems associated with MS4 discharges.

2. Review/amend your local construction site runoff control code to ensure it meets or exceeds requirements of the Ohio EPA General NPDES Permit for Storm Water Associated with Construction Activities #OHC000004 or applicable watershed-specific general permit (e.g., Olentangy and Big Darby watersheds).

3. Review/amend your local storm water management code to ensure it meets or exceeds requirements of the Ohio EPA General NPDES Permit for Storm Water Associated with Construction Activities #OHC000004 or applicable watershed-specific general permit (e.g., Olentangy and Big Darby watersheds).

4. Review/amend facility storm water pollution prevention plans (SWPPPs or SWP3s) for municipal facilities in accordance with the Ohio EPA General NPDES Permit for Storm Water Associated with Industrial Activities #OHR000005.

Details related to these updates will be discussed below. The SWMP must be updated and submitted to Ohio EPA within 2 years of when your community or group renewed coverage under NPDES permit #OHQ000003. The date varies by community, but is **no later than December 22, 2016**, for all existing permittees.

☞ **Required Action:** Update SWMP and submit to Ohio EPA **no later than December 22, 2016**, if you are a current permit holder.

RESOURCES FOR UPDATING SWMP

The following resources are available and should be reviewed and utilized when updating the SWMP:

Resource	Where to Locate It
Urbanized Area Map	www.neohiostormwater.com
TMDL Community Identifier Table	www.neohiostormwater.com
NPDES Permit #OHQ000003 (MS4)	www.epa.ohio.gov/dsw/permits/GP_MS4StormWater.aspx
NPDES Permit #OHC000004 (Construction)	www.epa.ohio.gov/dsw/permits/GP_ConstructionSiteStormWater.aspx
NPDES Permit #OHCD00002 (Construction within Big Darby watershed)	http://epa.ohio.gov/dsw/permits/GP_ConstructionSiteStormWater_Darby.aspx
NPDES Permit #OHCO00002 (Construction within a portion of the Olentangy watershed)	http://epa.ohio.gov/dsw/permits/GP_ConstructionSiteStormWater_Olentangy.aspx
NPDES Permit #OHR000005 (Industrial)	www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx
Existing SWMP and MS4 Annual Reports	Community files or Ohio EPA District Office. To obtain from Ohio EPA, send a written file review request to the appropriate district office.
TMDL Fact Sheets	www.neohiostormwater.com
Updated Model Ordinances	www.crwp.org or www.neohiostormwater.com
Memorandums of Understanding (MOUs) with Third Party Service Providers	Community files, MS4 Annual Report, or Third Party Service Provider files (e.g., health department, SWCD, consulting engineer, etc.)
Guidance Archived from Past MS4 Training Events	www.neohiostormwater.com or www.epa.ohio.gov/ocapp/train.aspx
U.S. EPA MS4 Program Guidance	http://water.epa.gov/polwaste/npdes/stormwater/Municipal-Separate-Storm-Sewer-System-MS4-Main-Page.cfm

SWMP TEMPLATE

For each of the six MCMs, your community's SMWP must include the following:

1. **The BMPs that you or another entity will implement.** The BMPs selected must address not only the minimum requirements and performance standards for each MCM, but also U.S. EPA-approved TMDL recommendations. In some cases, minimum requirements and performance standards will address TMDL recommendations, but in other cases, you may have to commit to additional BMPs to reduce the discharge of the pollutants of concern.

2. **For each BMP, provide the legal authority to implement said BMP.** If the legal authority already exists, include a copy of the municipal code, county/township resolution or other authorizing codes in the SWMP. Where legal authority must still be established, it should be established by December 22, 2016, i.e., the deadline to submit your updated SWMP to Ohio EPA. If you elect to include BMPs that require legal authority that cannot be established by this date, provide a schedule of how it will be pursued and when will it be adopted.

3. **Measurable goals for each BMP.** Measurable goals include BMP design objectives or goals that quantify the progress of program implementation and the performance of adopted BMPs. Measureable goals should be written to accomplish one of the following:

   a. **Track implementation over time.** Where a BMP is continually implemented over the permit term, a measurable goal can be developed to track how often, or where, this BMP is implemented.

   b. **Measure progress in implementing the BMP.** Some BMPs are developed over time, and a measurable goal can be used to track this progress until BMP implementation is completed.

   c. **Tracking total numbers of BMPs implemented.** Measurable goals also can be used to track BMP implementation numerically, e.g., the number of bioretention areas in place or the number of people changing their behavior due to the receipt of educational materials.

   d. **Tracking program/BMP effectiveness.** Measurable goals can be developed to evaluate BMP effectiveness, e.g., by evaluating a structural BMP's effectiveness at reducing pollutant loadings to meet TMDL requirements, or evaluating a public education campaign's effectiveness at reaching and informing the target audience to determine whether it reduces pollutants to the maximum extent practicable. A measurable goal can also be a BMP design objective or a performance standard.

e. **Tracking environmental improvement.** The ultimate goal of the NPDES storm water program is environmental improvement, which can be a measurable goal. Achievement of environmental improvement can be assessed and documented by ascertaining whether state water quality standards are being met for the receiving waterbody or by tracking trends or improvements in water quality (chemical, physical, and biological) and other indicators, such as the hydrologic or habitat condition of the waterbody or watershed.

At a minimum, your community's measurable goals should contain descriptions of actions you will take to implement each BMP, what you anticipate to be achieved by each goal, and the frequency and dates for such actions to be taken.

4. **Person responsible for implementing each BMP.** Identify the person, including position, title and department which will be responsible for the implementation of the selected BMP. If you are utilizing a third party service provider to implement all or a portion of the BMP, the SWMP must clearly identify the division of responsibilities in a Memorandum of Understanding (MOU) or other written agreement. The MOU is to be included in the SWMP.

5. **Rationale for BMP selection.** For each BMP, you must identify why you selected that practice and associated measurable goal. In some instances, the rationale will be to satisfy minimum performance standards or requirements of the NPDES permit. In other cases, it may be to address TMDL pollutants of concern. Yet in other cases, it may be to meet a local objective specific to your community, e.g., encourage infill development within existing urbanized areas.

Although there is no single required SWMP format that must be followed, to ensure you are providing the minimum required information to Ohio EPA, the following table may be useful to you:

MCM #		
BMP #1: Description	Legal Authority	*Include copy of legislation*
	Measurable Goal	
	Party(ies) Responsible to Implement	*Include MOU if using third party service provider*
	Rationale Statement	
BMP #2: Description	Legal Authority	*Include copy of legislation*
	Measurable Goal	
	Party(ies) Responsible to Implement	*Include MOU if using third party service provider*
	Rationale Statement	
BMP #3: Description	Legal Authority	*Include copy of legislation*
	Measurable Goal	
	Party(ies) Responsible to Implement	*Include MOU if using third party service provider*
	Rationale Statement	

The SWMP should also include narrative explaining how and why the combination of BMPs you selected will meet the goals of the NPDES permit program for small MS4s. A narrative should be provided for each MCM.

Information such as Tables of Organization for your community's MS4 program, MS4 Maps, MOUs, facility SWP3s and documents that describe standard operating procedures, e.g., a deicer or pesticide application plan, should be included as appendices or attachments.

CHECKLIST FOR UPDATING SWMP

Updating the SWMP does not mean a wholesale re-write of the plan. Rather, this is an opportunity for you to review the existing BMPs your community is implementing to meet the six minimum control measures (MCMs) and determine if they have been effective. Effective practices should remain a part of your community's program. In many instances, you may find that the BMP itself is not the issue, but rather, there is a lack of effective implementation, e.g., lack of enforcement of runoff controls on construction sites. You should determine what steps are needed to improve practice implementation, e.g., an improved enforcement escalation plan, and incorporate necessary revisions into the SWMP. In other instances, there may be a gap between your program and minimum performance standards or NPDES permit requirements. In updating the SWMP, these gaps must be identified and eliminated. This checklist is intended to help you determine where gaps may exist.

This checklist is organized by minimum control measure (MCM). We recommend that you utilize this checklist to review your SWMP before submitting it to Ohio EPA. Although some questions may not be applicable to your community, most of the questions are applicable to all regulated MS4s and are based on current NPDES permit requirements. As such, your general goal is to be able to answer "Yes" to every question. If you answer "No," your SWMP is may likely be incomplete or deficient. When a question is not applicable to your community, we recommend that you note "N/A" and explain why it is not applicable within the SWMP.

All regulated small MS4s must include BMPs in the SWMP to address minimum requirements and performance standards of the NPDES permit. In addition, if your MS4 discharges to a watershed for which the U.S. EPA has approved a Total Maximum Daily Load (TMDL), your SWMP must incorporate enhanced practices to address (reduce) the discharge of TMDL-specific pollutants from your MS4. The TMDL Community Identifier Table should be utilized to determine if your community is subject to TMDL requirements, and if so, which TMDL pollutants are of concern.

There is some flexibility for BMP selection if you are subject to a TMDL requirement. Each TMDL Fact Sheet explains the sources of a particular pollutant and provides you with suggestions of BMPs that can be adopted to address that pollutant. After reviewing BMP suggestions, select those that you will implement in your community and set a measurable goal for each BMP implementation. As you review the TMDL Fact Sheets, you will note that many BMPs appear on multiple fact sheets. In communities with TMDLs for multiple pollutants, it would be wise to include those BMPs that address multiple pollutants in your SWMP as it may allow your community to address multiple concerns with one practice.

Under every MCM, the checklist will ask if you have selected BMPs to address your TMDL concerns. You do not necessarily have to include a BMP to address a TMDL concern under every MCM. For example, you may elect to increase the frequency of construction site inspections to twice a month to address a Total Suspended Solids (TSS) TMDL, but not elect to conduct public education on erosion and sediment control practices. However, the SWMP should explain why the suite of BMPs you selected to address TMDL concerns is appropriate for your community.

Further, the TMDL Fact Sheets identify required BMPs under each MCM and suggest BMPs to enhance your program. If subject to the TMDL requirement, only selecting required BMPs and only meeting minimum performance standards applicable to all small MS4s will not be acceptable to address TMDL concerns. **Although Ohio EPA has not set a minimum required number of BMPs that must be selected to address TMDL concerns, the agency has indicated that it expects BMP selection or implementation to go above the baseline required of all communities if you expect to**

receive credit for meeting TMDL requirements. Thus, you should select an appropriate number of enhanced BMPs to include in your community's SWMP for every TMDL pollutant parameter of concern in your community. Explain why you selected those BMPs, how you set the corresponding measurable goals, and why this combination of practices is appropriate for your community. For example, your community may be subject to a Total Suspended Solid (TSS) TMDL, but does not see a lot of construction activity for new development or redevelopment. Thus, increasing the frequency of construction site inspection or implementing an enhanced enforcement escalation plan for construction site operators would not be appropriate for your community. Perhaps the source of TSS in your community is erosion from unmaintained and unstable road ditches. A program to grade, vegetate or otherwise stabilize a certain length of road ditch per year would be more appropriate. Perhaps the source of TSS in your community is street litter. If so, an enhanced street sweeping and catch basin cleaning program and/or an education campaign on litter control may be more appropriate for your SWMP.

You are not limited to only choosing practices from the TMDL Fact Sheets, but you must demonstrate how your chosen practices address the TMDL concern. This should occur within rationale statements or other SWMP narratives.

If your community discharges to more than a single watershed, your SWMP must include BMPs to address all pollutant parameters of concern for all watersheds to which you discharge. Different watersheds may have different pollutant parameters of concern. As such, BMP selection and implementation may vary within your community based on location. Whereas there may be reason to implement different BMPs in different watersheds in a larger community where different watersheds have very different TMDL concerns, for the typical small MS4, if you discharge to more than one watershed, we recommend that you implement the selected BMPs community-wide, regardless of location. This will ensure a consistent program throughout your community and make it easier to administer and enforce.

☞ Use the TMDL Community Identifier Table to determine if you are subject to the TMDL requirements of the NPDES permit. If so, it will indicate the pollutant parameters of concern for your community. Identify each watershed and mark the pollutant parameters of concern for each watershed using the tables below:

Watershed 1:		Watershed 2:	
Pollutant Parameters of Concern		Pollutant Parameters of Concern	
☐ TSS	☐ Habitat	☐ TSS	☐ Habitat
☐ Nutrients	☐ Flow	☐ Nutrients	☐ Flow
☐ Bacteria	☐ Dissolved Oxygen/ Organic Enrichment	☐ Bacteria	☐ Dissolved Oxygen/ Organic Enrichment
Watershed 3:		Watershed 4:	
Pollutant Parameters of Concern		Pollutant Parameters of Concern	
☐ TSS	☐ Habitat	☐ TSS	☐ Habitat
☐ Nutrients	☐ Flow	☐ Nutrients	☐ Flow
☐ Bacteria	☐ Dissolved Oxygen/ Organic Enrichment	☐ Bacteria	☐ Dissolved Oxygen/ Organic Enrichment

☞ For each pollutant parameter you marked, use the corresponding TMDL Fact Sheet to select required BMPs and an appropriate mix of enhanced BMPs for inclusion in your community's SWMP. Ensure that BMP selection and associated measurable goals meet or exceed minimum performance standards of the NPDES permit.

☞ If your community is not subject to TMDL requirements, include required BMPs and meet minimum performance standards of the NPDES permit. The implementation of enhanced BMPs is recommended, but optional.

NEOSWTC SWMP Update Checklist

MS4 Permittee:	
Co-Permittee (if applicable):	
Facility Permit Number:	
Effective Date of Permit Coverage under NPDES Permit #OHQ000003	

MCM #1: Public Education and Outreach

The SWMP should identify the topics your community will use for a public education program, the target audience you expect to reach with each activity, the tools you intend to use to deliver messages and how you will evaluate the success of your overall program. Remember, the public education program must focus on storm water-related messaging in order to meet requirements.

Question	Yes	No
Does your SWMP identify the themes or messages that you will utilize for storm water education during this NPDES permit term?		
Have you selected at least five themes or messages to implement?		
Is one of your themes targeted to the construction industry (developers, contractors, homebuilders)?		
Does one of your themes inform public employees, businesses and the general public about the hazards associated with illicit discharge?		
Have you selected themes or messages that address TMDL concerns?		
For each message, have you identified the mechanisms by which you will deliver the message?		
For each message, are you utilizing more than one delivery mechanism (e.g., brochure, radio ad, website, information booth at festival, etc.)		
Have you identified the target audience for each message and delivery mechanism and stated why that audience was selected?		
Have you estimated the number of people you expect to reach utilizing each message and delivery mechanism?		
Is your education program designed to reach at least 50% of your population by the end of the NPDES permit term?		
Does your SWMP identify the person (department) responsible for managing the public education program?		
If utilizing a third party to provide all or some of your education program, have you included a copy of the MOU in the SWMP?		
Does your SWMP identify how you will evaluate the effectiveness of your education program?		

MCM #2: Public Involvement and Participation

The SWMP should describe the activities you will conduct to allow public participation in development and implementation of your community's storm water management program. You must also ensure compliance with state and local public notice requirements when implementing this MCM. Many public involvement activities such as stream clean-ups and storm drain stenciling can also double as public education tools, allowing your community to receive credit for both MCM #1 and #2 goals with one effort. So, choose wisely!

Question	Yes	No
Does your SWMP ensure that public involvement and participation activities are public noticed in accordance with state and local law?		
Does your SWMP identify the public involvement and participation opportunities you will provide over the NPDES permit term?		
Have you included at least five public involvement and participation opportunities in the SWMP?		
Have you selected involvement activities that would address TMDL concerns?		
For each involvement activity, does the SWMP identify the target audience you expect to participate or involve?		
Does your SWMP identify the person (department) responsible for managing the public involvement program?		
If utilizing a third party to provide all or some of your involvement program, have you included a copy of the MOU in the SWMP?		
Does your SWMP identify how you will evaluate the effectiveness of your involvement program?		

MCM #3: Illicit Discharge Detection and Elimination (IDDE) Program

Under the previous generation of the NPDES permit for small MS4s, all communities were required to enact codes or other legal mechanisms to prohibit illicit discharges to the MS4. In addition, all communities were to complete a map of the MS4 system. Your SWMP must include copies of the codes and MS4 system map, or if maintained electronically, a description of where the information can be found. Moving forward, communities are to keep the map updated and implement an on-going program to continue to detect and eliminate sources of illicit discharge such as cross-connections, failing or discharging sewage treatment systems and open dumping. The SWMP must include enforcement mechanisms to ensure compliance with local codes.

Question	Yes	No
Authorizing Legislation		
Have you included a copy of the code(s) that you utilize to prohibit illicit discharges to the MS4?		
Does your code include a list of allowable non-storm water discharges to the MS4 (see Part III.B.3.g of NPDES Permit #OHQ000003 for complete list of allowable discharges)?		
Does your code include a list of occasional incidental non-storm water discharges (e.g., non-commercial charity car washes) that your community allows to discharge to the MS4?		
If you have allowed occasional incidental non-storm water discharges to your MS4, does the SWMP indicate how you determined that these discharges are not a significant source of pollutants to the MS4?		
Does the SWMP identify the person (department) responsible for overall management of the IDDE program?		

If relying on a third party service provider to conduct system surveillance, source tracing or illicit discharge elimination does the SWMP include an MOU?		
MS4 System & HSTS Maps		
Have you completed a map of your MS4 system?		
Does the map include the following (only publicly-owned or operated structures must be shown, except where noted):		
• Catch basins, pipes and open ditches?		
• Flood control facilities?		
• Post-construction water quality practices?		
• Privately-owned post-construction water quality practices installed since April 21, 2003?		
Have you included a copy of the map in the SWMP?		
Does your SWMP describe the mechanism by which the map is updated and identify the person (department) that is responsible for performing updates?		
Does the SWMP ensure that the map is updated at least once a year to reflect the addition or removal of public storm water infrastructure?		
Does the SWMP ensure that the map is updated at least once a year to reflect addition or removal of privately-owned post-construction water quality practices installed to satisfy the requirements of Ohio EPA's NPDES Permit for Storm Water Associated with Construction Activities?		
Does the SWMP ensure that the map is updated within one year whenever your system expands as a result of annexation or expansion of the urbanized area as determined by the latest decennial census?		
Does the SWMP include an address list and map of sewage treatment systems which discharge into the MS4?		
Does the SWMP describe the mechanism by which the address list and map are updated and identify the person (department) that is responsible for performing updates?		
IDDE Surveillance Plan		
Have you conducted dry weather screening of 100% of your MS4 outfalls at least once to date?		
Have you evaluated the data collected from initial dry weather screening to identify priorities and goals for an on-going system surveillance program?		
Does the SWMP describe your program for on-going system surveillance and identify the department or party responsible to conduct surveillance?		
Does your program describe the mechanisms that will be utilized for on-going system surveillance and the frequency with which the mechanisms will be implemented?		
Does the on-going program include a provision to evaluate data collected each year to set or revise priorities and goals annually and identify the person (department) responsible to do this?		
For sewage treatment systems that discharge to your MS4, does the SWMP include a program to evaluate these systems to ensure that they are operating in compliance with an NPDES permit or are operating as designed?		
For on-lot sewage treatment systems, does your SWMP include a program to evaluate these systems to ensure that they are operating as designed?		
Does your SWMP include training for municipal staff on how to spot and identify an illicit discharge and to whom it should be reported?		
Does your SWMP include a program to address open dumping?		
Does the SWMP describe procedures for investigating illicit discharge complaints?		
Have you targeted your IDDE surveillance plan to address TMDL concerns?		
IDDE Elimination Plan		
Does the SWMP describe procedures for locating priority areas with higher likelihood of illicit		

Question		
connections?		
Does the SWMP describe procedures for tracing the source of illicit discharge?		
Does the SWMP describe the procedures for removing the source of illicit discharge, including enforcement mechanisms to be utilized?		
For illicit discharge sources that you do not have legal authority to eliminate due to limitations in state law, does the SWMP identify those situations and include a process to refer the problem to the appropriate agency for elimination?		
For sources of illicit discharge that were not removed by the end of the reporting year, does the SWMP include a mechanism to track those cases and develop a site-specific source elimination plan?		
Have you established enforcement initiatives designed to address TMDL concerns?		

MCM #4: Construction Site Runoff Control

Under previous generations of the NPDES permit, all communities were required to enact legislation to ensure construction site operators install sediment and erosion controls and controls for other pollutants found at construction sites. Communities must review and approve a storm water pollution prevention plan (SWP3) for all construction activities where the larger common plan of development or sale disturbs 1 or more acre of land. MS4s must conduct regular site inspections to ensure compliance with the approved SWP3. Communities are required to take appropriate enforcement action on sites that are not in compliance with the approved plan.

Question	Yes	No
Authorizing Legislation		
Have you included a copy of the code(s) used to require the implementation of sediment and erosion controls on construction sites?		
Do the code(s) also require the implementation of pollution prevention practices for pollutants other than sediment at construction sites, e.g., concrete wash water, trash and debris, fuel tanks, etc.		
Is the code applicable to all construction activities where the larger common plan of development or sale disturbs one or more acres of land?		
Is the code updated to meet or exceed technical requirements of the Ohio EPA General NPDES Permit for Storm Water Associated with Construction Activities #OHC000004, including federal effluent limitations found in Part II?		
Have enhanced requirements been added to your code(s) to address TMDL concerns?		
Does the SWMP identify the person (department) responsible for overall management of the construction site program?		
Plan Review Program		
Does the SWMP describe your program to review the storm water pollution prevention plan (SWP3) or an equivalent construction site runoff control plan?		
Does your program for SWP3 review apply to all construction activities where land disturbance is one or more acre?		
Does your program require SWP3 approval prior to the start of construction activities (any clearing, grading, grubbing, filling or excavating)?		
Does the SWMP identify the person (department) responsible for conducting SWP3 review and issuing SWP3 approval?		
If relying on a third party service provider to conduct SWP3 review, does the SWMP include an MOU?		
If different from private development, does the SWMP describe your program for reviewing the SWP3 for municipal construction projects, e.g., road improvement or new fire station?		

Site Inspection Program		
Does the SWMP describe your program for conducting construction site inspections to ensure implementation of the approved SWP3?		
Does your program require an initial construction site inspection (within the first month after construction activities commence)?		
Does the SWMP describe your procedures for on-going inspection of construction sites to ensure compliance with the approved SWP3?		
Does the SWMP require construction sites to be inspected at least once per month or does it describe procedures for prioritizing inspections per an alternative frequency or schedule based on TMDL concerns, proximity to waterways, amount of disturbed area, compliance history of the site, etc.?		
Does the SWMP identify the person (department) responsible for conducting construction site inspections?		
If relying on a third party service provider to conduct construction site inspection, does the SWMP include an MOU?		
If different from private development, does your SWMP describe your program for inspecting municipal construction projects?		
Enforcement Program		
Does your SWMP describe your program for enforcement of the approved SWP3?		
Does your authorizing legislation include enforcement provisions, e.g., stop work orders, Notices of Violation, fines, criminal penalties, etc.?		
Does your program establish an enforcement escalation plan that clearly defines the enforcement mechanisms, processes and procedures, to be utilized?		
Does the enforcement escalation plan identify the person (department) responsible for conducting enforcement activities?		
Does your program provide a mechanism for reporting non-compliance issues to construction site operators, e.g., a written inspection report or Notice of Violation, and establish standard timeframes for corrective action?		
Does your SWMP describe enforcement mechanisms for municipal construction projects, e.g., the contract language to ensure the development, implementation and enforcement of an SWP3?		
Have you established enforcement initiatives to address TMDL concerns?		

MCM #5: Post-Construction Storm Water Management

Under previous generations of the NPDES permit, all communities were required to establish requirements to install post-construction water quality practices on new development and redevelopment sites where the larger common plan of development or sale disturbs one or more acres of land. Communities must have a program in place to review post-construciton BMP plans and ensure they are implemented. Inspections are required to ensure proper installation, but there is some flexibility on how a community ensures that on-going, long-term maintenance will occur. An enforcement program must be in place to ensure proper construction and long-term maintenance of post-construction BMPs.

Question	Yes	No
Authorizing Legislation		
Have you included a copy of the code(s) used to require the implementation of post-construction water quality BMPs on new development and redevelopment where the larger common plan of development or sale disturbs 1 or more acre?		
Has your storm water management code been updated to meet or exceed technical requirements of the Ohio EPA General NPDES Permit for Storm Water Associated with		

Construction Activities #OHC000004?		
Do your codes require structural BMPs to treat the Water Quality Volume (WQv) when the larger common plan of development or sale disturbs 5 or more acres of land?		
Does your code include requirements for post-construction BMPs when the larger common plan of development or sale disturbs one or more acres, but less than 5 acres of land?		
Does your SWMP include planning, zoning and building codes for non-structural BMPs that limit the creation of impervious surfaces, reduce the spread of impervious surfaces, or protect sensitive open spaces? Codes may include, but are not limited to, riparian and wetland setbacks, parking space maximums, downspout disconnection, conservation development, compact development, and mixed-use development and incentives for infill development or redevelopment.		
Have enhanced requirements been added to your code(s) to address TMDL concerns?		
Does the SWMP identify the person (department) responsible for overall management of the post-construction program?		
If different from private development, does the SWMP describe the standards for post-construction BMP selection and implementation for municipal construction projects, e.g., road improvements?		
Plan Review		
Does the SWMP describe your program to review the SWP3 or an equivalent post-construction storm water management plan?		
Does your program for SWP3 review apply to all new development and redevelopment where one or more acres of land are disturbed?		
Does your program require SWP3 approval prior to the start of construction activities (any clearing, grading, grubbing, filling or excavating)?		
Do you ensure submittal of a long-term maintenance plan and agreement that identifies the party responsible to conduct long-term maintenance, the routine and non-routine maintenance tasks required, schedules for inspection and maintenance activities, legal agreements such as access and maintenance easements, and a map showing the location of such easements?		
Does the SWMP identify the person (department) responsible for conducting SWP3 review and issuing post-construction BMP approval?		
If relying on a third party service provider to conduct SWP3 review, does the SWMP include an MOU?		
If different from private development, does the SWMP describe your program for reviewing the SWP3 for municipal construction projects, e.g., road improvement or new fire station?		
Program to Ensure Installation		
Does the SWMP describe the inspection and enforcement mechanisms used to ensure permanent storm water quality practices are constructed per the approved SWP3?		
Does the SWMP identify the person (department) responsible for conducting inspections of post-construction BMPs to ensure proper installation?		
Does your program include a mechanism for reporting non-compliance issues to construction site operators, i.e., written inspection report or Notice of Violation, and establish standard timeframes for corrective action?		
If relying on a third party service provider to conduct these inspections, does the SWMP include an MOU?		
Long-Term Maintenance Program		
Does your SWMP describe the inspection and enforcement mechanisms to ensure post-construction BMPs remain functional in perpetuity?		
Does your long-term maintenance program include enhanced features to address TMDL concerns?		

	Yes	No
Does SWMP describe how your community will archive the long-term maintenance plan and agreement for future reference?		
Does your program include mechanisms to ensure long-term maintenance plans and agreements are updated when there is a change in ownership or BMP design?		
Do your maintenance agreements include a mechanism to ensure property owners have appropriate funding in place to conduct long-term maintenance activities?		
Have you included publicly-owned water quality practices such as extended detention ponds, bioretention areas, green roofs, permeable pavement or proprietary storm water treatment practices on your MS4 map?		
Does your SWMP include a process to add new or remove abandoned post-construction BMPs from the post-construction BMP inventory/map?		
Does the SWMP identify the person (department) responsible for managing the long-term maintenance program for post-construction BMPs?		
If relying on a third party service provider to conduct long-term maintenance inspections and notify property owners, does the SWMP include an MOU?		
Does your SWMP describe your program for maintaining publicly-owned permanent water quality practices, including maintenance schedules?		
Enforcement Program		
Does your SWMP describe your program for enforcement of the approved SWP3?		
Does your code include enforcement provisions, e.g., stop work orders, Notices of Violation, fines, criminal penalties, etc?		
Does your program establish an enforcement escalation plan that clearly defines the enforcement mechanisms, processes and procedures, to be utilized to ensure proper construction and long-term maintenance of post-construction BMPs?		
Does the enforcement escalation plan identify the person (department) responsible for conducting enforcement activities?		
Does the enforcement escalation plan describe the process for notifying property owners of long-term maintenance problems and establish standard timeframes for corrective action?		
Have you established enforcement initiatives to address TMDL concerns?		

MCM #6: Pollution Prevention & Good Housekeeping for Municipal Operations

Communities are required to implement pollution prevention practices at all municipal operations. The SWMP is to include a list (name and address) of locations where municipal operations are conducted. Under the previous generation of the NPDES permit, certain facilities were required to develop and implement a storm water pollution prevention plan (SWPPP). Under the current NPDES permit, MS4s are required to update those plans to ensure compliance with the Ohio EPA General NPDES Permit for Storm Water Associated with Industrial Activities #OHR000005. As a result, MS4s will need to update the SWPPPs for their facilities such as service yards, compost yards, vehicle maintenance facilities, bus terminals, impound lots and waste transfer stations. In addition, some communities may operate facilities that require a separate NPDES permit for industrial storm water. These facilities include wastewater treatment plants designed to discharge ≥ 1 MGD or with a pretreatment program, landfills, airports, marinas, shipping ports and steam electric power plants. The SWMP should identify the NPDES permit number, or if applicable, the No Exposure Certification number, for each of these facilities. These facilities also require an SWPPP, but the requirements of that plan will be contained in their respective NPDES permit, not the NPDES permit for small MS4s.

Question	Yes	No
Employee Training		
Does the SWMP establish a program for employee training on storm water pollution		

prevention practices?		
Does the program identify which departments will receive training and provide a topic list and schedule for training?		
Does the SWMP ensure that training occurs at least once per year?		
Does the SWMP identify the training that employees will receive on storm water best management practices that address TMDL concerns?		
If relying on a third party service provider to conduct employee training, does the SWMP include an MOU?		
Storm Water Pollution Prevention Plans (SWPPPs) for Municipal Operations		
Does the SWMP include a list (name/address) of municipal facilities subject to pollution prevention and good housekeeping requirements? This may include, but is not limited to: maintenance facilities, bus terminals, composting facilities, impound lots, waste transfer stations, leaf collection and other storage yards, parks, cemeteries and municipal parking lots.		
Does the SWMP identify the person (department) responsible to ensure implementation of pollution prevention practices at each municipal facility subject to the pollution prevention and good housekeeping program?		
Does the SWMP include a facility-specific SWPPP for your service yard, vehicle maintenance facilities not located at the service yard, bus terminals, composting facilities, impound lots and waste transfer stations?		
Have you updated the SWPPP for the above facilities to meet substantive requirements of the Ohio EPA General NPDES Permit for Storm Water Associated with Industrial Activities #OHR000005? This includes updates to site maps, inclusion of sector-specific best management practices and implementation of inspection requirements, but not benchmark or effluent limitation monitoring.		
Do the SWPPPs for your facilities include BMPs selected to address TMDL concerns or include enhanced requirements to address TMDL concerns?		
For municipal facilities subject to industrial storm water permitting, does the SWMP identify the NPDES facility permit number or No Exposure Certification number associated with each facility?		
Have you developed and implemented an SWPPP in compliance with the NPDES permit associated with each facility with its own NPDES permit?		
Do the SWPPPs for your facilities with their own NPDES permits include BMPs selected to address TMDL concerns or include enhanced requirements to address TMDL concerns?		
Does the SWMP include a copy of the SWPPP for facilities with their own NPDES permit?		
Does your SWMP establish procedures or describe the mechanisms you use to ensure the implementation of SWPPPs at affected facilities?		
MS4 System Maintenance and Pollution Prevention Programs		
Does the SWMP include a maintenance schedule for the MS4, i.e., publicly-owned storm sewers, catch basins, streets, open channels along roads, parking lots, and storm water management practices such as detention and retention ponds, proprietary practices and green infrastructure?		
Does the SWMP describe maintenance standards for the MS4?		
Does the SWMP identify the pollution prevention practices for the following municipal operations you conduct?		
	Street sweeping	
	Catch basin cleaning	
	Parking lot sweeping	
	Ditch cleaning	
	Deicer application and storage	
	Road kill management	

	Trash collection		
	Leaf and yard debris collection		
	Mulch manufacturing		
	Street repairs and maintenance		
	Water and power line repairs and maintenance		
	Pesticide, herbicide and fertilizer application and storage		
	Parks, cemetery and golf course grounds management		
	Police and fire departments		
Does the selection or implementation of BMPs for your pollution prevention program address TMDL concerns?			
Does the SWMP identify the person (department) responsible for overall management of the pollution prevention and good housekeeping program?			