



MS4 SWPPP document: Frequently asked questions

Q: What is the difference between the application and the Stormwater Pollution Prevention Program (SWPPP) Document? How do I find “Part I” of the application? What do I need to submit on my due date?

A: The application and the SWPPP Document are interchangeable terms. The SWPPP Document is Part II of the application. Part I of the application was submitted by your community in 2011. Your Part I submittal included your permit fee and an acknowledgement of your intent to reapply under the revised 2013 Municipal Separate Storm Sewer Systems (MS4) General Permit. The materials that you need to submit are simply the SWPPP Document, any information that you wish to attach as instructed in the SWPPP Document, and, if you have a Total Maximum Daily Load (TMDL) with a wasteload allocation that was approved before August 1, 2013, the MS4 Permit TMDL Spreadsheet. The Best Management Practices (BMP) Summary sheets used in the last Permit issuance are not a part of the application in this cycle. Submit your SWPPP Document and additional application items to the MS4 Permit Program E-mail Inbox at: ms4permitprogram.pca@state.mn.us.

Q: I have seen several dates associated with the MS4 Permit. Can you explain what they all mean?

A: There are several important dates associated with the 2013 MS4 General Permit. August 1, 2013, is the effective date of the Permit. It is from this date that the 90, 120, and 150-day SWPPP Document due dates are measured. Due dates for Groups 1, 2, and 3 are respectively October 30, December 2, and December 30, 2013. Once your application has been reviewed and tentatively approved by the Minnesota Pollution Control Agency, you will receive the dates for a 30-day window during which your SWPPP Document will be placed on public notice and open for public comment. After the public notice process has been completed, you will receive a letter that states the date that your Permit coverage begins. Twelve months from this date is when your community must be in full compliance with the terms of the 2013 MS4 General Permit.

Q: How am I supposed to complete the SWPPP Document before my application due date? It will take way more than three months to incorporate the new requirements in the 2013 MS4 Permit into my program!

A: The SWPPP Document is a road map for your program modifications. In it you will outline what you will do to come into compliance with the 2013 MS4 General Permit within 12 months of the date that you receive coverage. Each section offers the opportunity to cover the tasks and corresponding schedules that you will undertake to meet 2013 MS4 Permit requirements. For example, if you need to adopt an ordinance to deal with post-construction stormwater (MCM 5), you could say that you will look into the Minimal Impact Design Standards¹ (MIDS) Community Assistance Package as soon as it is available, and evaluate whether this approach will work for your city, but regardless will have an updated ordinance to meet Permit requirements within 12 months of receiving Permit coverage.

Q: Speaking of MIDS, is that a Permit requirement?

A: No, MIDS is by no means a Permit requirement. MIDS is a tool developed in partnership with your peers to help you meet MS4 Permit requirements associated with MCM 5, concerning the stormwater treatment performance standards for new development and redevelopment. One component of MIDS is a calculator designed to be an easy-to-use tool that will quantify stormwater treatment for various BMPs. You are free

¹ <http://www.pca.state.mn.us/index.php/water/water-types-and-programs/stormwater/stormwater-minimal-impact-design-standards-mids.html>

to adopt all or part of MIDS. The use of MIDS is voluntary; however, if you choose not to use MIDS, then you must develop an alternative, technically-defensible approach in order to meet these Permit requirements. More information on how MIDS can fit into your stormwater program can be found in the MIDS fact sheet².

Q: If I am a township who partners with a county to help me meet Permit requirements, especially the ordinances related to MCMs 3, 4, and 5, what do I need to submit in my SWPPP Document?

A: If you do not have an ordinance, but the responsible parties in both your local government and the county government are aware of this and agree that the county will cover the township, then you should submit the county's ordinance and acknowledge the partnership in both Section I.: "Partnerships" and all relevant areas in the SWPPP Document (e.g., for ordinances, Section II.: "Description of Regulatory Mechanisms." If you have an ordinance that defers to the county, include both).

Q: I have a lot of field staff. Do they all need to receive illicit discharge detection and elimination (IDDE) training?

A: Yes, the Permit does require that all field staff get IDDE training. For a township, this would include contractors who perform inspections. However, this training can be very simple: it is acceptable for training to consist of a short PowerPoint that is e-mailed out to staff and shows examples of what to notice and who to call when they spot something out of the ordinary. Resources to develop this are widely available in locations such as the MS4 Toolkit³ and the U.S. Environmental Protection Agency⁴. For more in-depth training, the University of Minnesota offers an IDDE course by request⁵.

Q: What is the difference between the items that need to go in my Pond, Wetland, and Lake Inventory and those that need to be in my Storm Sewer System Map?

A: The Storm Sewer System Map does not need to include privately owned stormwater ponds, but the Pond Inventory will need to include those. Both the Map and the Inventory should only include infrastructure that is connected to the MS4 by a constructed conveyance. The Inventory is not due until 12 months after your community receives a Permit coverage letter.

Q: Do I need to include every BMP I have ever done in my BMP tables? What if I stopped using a BMP?

A: Yes, the Permit language specifically states that any BMPs that have been implemented must be included in the SWPPP Document⁶, so that would include BMPs that were once implemented, but have since been taken out of use. However, the Permit does not allow backsliding, so if you have ceased to implement a BMP, it should be replaced with a BMP that addresses the same concern. If you are continuing a BMP that you have already established and are currently implementing, then you only need to include it in the "Established BMPs" table. For the timeframe, after you have outlined measurable goals and interim milestones for implementation of the BMP, indicate that you are continuing it into the next permit term.

² <http://www.pca.state.mn.us/index.php/view-document.html?qid=10516>

³ <http://www.cleanwatermn.org/About-You/MS4Toolkit.aspx>

⁴ <http://cfpub.epa.gov/npdes/stormwater/idde.cfm>

⁵ <http://www.erosion.umn.edu/courses/Brochure.pdf>

⁶ 2013 MS4 General Permit Part II.D.5.a