



BUREAU OF WATERSHED MANAGEMENT
PROCEDURAL INSTRUCTIONS
RUNOFF MANAGEMENT POLICY AND MANAGEMENT TEAM

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MS4 Permit Program
Evaluation Procedures
for DNR Storm Water Program Staff

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The Wisconsin Pollutant Discharge Elimination System (WPDES) Municipal Separate Storm Sewer System (MS4) Permit Program Evaluation Procedures is intended to assist Wisconsin Department of Natural Resources (DNR) storm water staff with statewide consistency in assessing MS4 program compliance. This document is intended solely as guidance, and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This document does not establish or affect legal rights or obligations, and is not finally determinative of any of the issues addressed. This document does not create any rights enforceable by any party in litigation with the State of Wisconsin or the DNR. Any regulatory decisions made by the DNR in any matter addressed by this document will be made by applying the governing statutes and administrative rules to the relevant facts.

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INTRODUCTION

Background and Purpose

The Wisconsin Department of Natural Resources (DNR) issues and administers municipal separate storm sewer system (MS4) discharge permits. The MS4 permits require municipalities to reduce polluted storm water runoff by implementing storm water management programs with best management practices (BMPs). This document delivers a clear framework for DNR Storm Water Staff to objectively evaluate a municipality's compliance with their municipal storm water permit. The recommendations in the document provide increased consistency in statewide MS4 evaluations, which could result in more uniform compliance reporting.

Note: This framework is designed primarily to accommodate "traditional" MS4s (cities, towns, villages, counties, etc.). Minor modifications may need to be made when applying to non-traditional MS4s (University system, Wisconsin Department of Transportation, etc.).

Goals

The goals of an MS4 permit evaluation are to:

- Determine a municipality's MS4 permit compliance status
- Determine program effectiveness
- Identify best practices (implementation procedures, tracking, documentation, etc.)
- Determine where a municipality might need more assistance, training, guidance, etc.
- Assist recently-permitted municipalities with program development

Benefits

- Strengthen working relationship between DNR and municipalities
- Determine compliance and possible changes that need to be made to a MS4 storm water program
- Improve municipalities' understanding of expectations and permit requirements
- Clarify MS4 permit requirements
- Gain knowledge about municipalities' operations, priorities, challenges, etc.
- Improve water quality by improving MS4 Storm Water Management Programs (SWMP)
- Identify potential permit language changes

Terminology

EVALUATOR: A WPDES permitting authority staff person conducting an evaluation of a MS4 program.

MEASURABLE GOAL: A quantifiable goal set by the permittee for each program element which is used to demonstrate compliance with permit requirements and to evaluate the effectiveness of individual control measures and the storm water management program as a whole.

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MS4 PROGRAM EVALUATION: An assessment of all six major MS4 permit programs including documentation review, interviewing municipal staff, and conducting field inspections to assess compliance with the permit conditions.

PROGRAM ELEMENT: One of the six minimum control measures required under NR 216.06(2)(a) through (f).

SCREENING: A basic review of documentation to determine a permitted MS4's basic understanding and compliance with a MS4 permit. This step can also be used to flag permit areas where more evaluation is needed, and/or justify a targeted approach if efforts are being focused on specific minimum measures.

WORKSHEET: An optional guide for WPDES permitting authority staff person to use while conducting an MS4 Program Evaluation. The worksheet may be used in writing the MS4 evaluation report.

COMMON ACRONYMS:

BMP – best management practices

E/O – education and outreach

IDDE – illicit discharge detection and elimination

I&E – information and education

MS4 – Municipal Separate Sewer System

SOP – standard operating procedures

SWMP – storm water management plan

SWPPP – storm water pollution prevention plan

TMDL – total maximum daily load

TSS – total suspended solids

WLA – waste load allocation

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EVALUATION PROCESS

Process Step	Objective	Approx. Staff Time (hrs)	Total Time
1. Selection	Decide which MS4 permittee and program elements to be evaluated.	2	
2. Screening	Familiarize with permit conditions, program submittals (i.e., legal mechanisms, program procedures, SWPPPs, reports), measurable goals, and compliance history. Discover any gaps in program documentation to request in notification.	8	
3. Notification	Identify scope and purpose, establish date and time of evaluation, and make specific documentation and staff contact requests	2	2 weeks to receive requested information
4. Evaluation Preparation	Obtain and review requested documentation, further refine scope and purpose through internal and external pre-evaluation conference calls, and work out logistics including site inspection selection, travel, lunch, lodging, etc.	4	2 weeks after receiving information
5. Meeting	Complete evaluation through interview and inspection process.	8 - 16	Evaluation occurs at week 4
6. Report	Summarize discussions, detail site observations, and provide findings. Discuss draft with supervisor and supporting staff. Make revisions and send to MS4.	8	1 month to generate report and send to MS4
7. Compliance Determination	Discuss stepped enforcement process with supervisor and complete EE request if observations in report are in violation of permit conditions.	2	1 month to make compliance determination and notify MS4

A complete review of the MS4 permitting program is estimated to take 34 to 42 hours. Supplementing complete MS4 Program Evaluations with targeted inspections of select program elements may be a strategy employed where there is evidence of a deficient program across a number of permittees or where the Department continues to find noncompliance with a program element by a single permittee. As compared to an MS4 Program Evaluation where compliance determinations are made after the evaluation is completed, a targeted inspection should be done as part of the Department's stepped enforcement process. Targeted inspections should follow the same general process as a complete MS4 Program Evaluation.

MS4 Program Evaluation Procedures

Step 1 – SELECTION

A. **Selection Factors.** *Which permittee(s) should be evaluated?*

- Permit compliance schedule issues based on complaints, Department interactions, annual report review, and knowledge of late and/or inadequate submittals.
- Failure to implement parts or whole program procedures (i.e., missing inspection reports for construction sites at prescribed frequency in inspection and enforcement procedures).
- Listed surface water impairments or other water quality concerns.
- Proximate to or similar in demographic/size as other MS4s previously evaluated or scheduled for evaluation near term.
- Consider a regional strategy to meet performance objective (i.e., all permittees to be evaluated at least once per permit term as part of the permit reapplication process). Select MS4s within context of a regional or statewide strategy (PMT decision).

B. **Identify Evaluator Roles.** ID evaluators (Storm Water Specialist(s) and/or Engineer(s)) lead and supporting roles, consider:

- Who will handle the correspondence and meeting coordination?
- Who is leading the interview?
- Who is supporting field work?
- Who will prepare the evaluation summary?
- Is assistance needed on all or only certain components of the evaluation?

Step 2 – SCREENING

A. **Review materials** to become familiar with the permittee's program before sending notification. Screen all program elements.

- **MS4 Permit.** The evaluation is an assessment of the permittee's compliance with its WPDES permit. Read the permit to become familiar with it (whether it is general permit or individual permit) and its requirements.
- **Annual Report.** Review the permittee's latest annual report to establish the program's current implementation status. Previous annual reports should also be reviewed to better track program development and implementation.
- **SWMP.** Review the latest SWMP planning documents. Note commitments and schedules, especially dates that will have passed by the scheduled evaluation.

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- **Procedural documents.** Review standard operating procedures detailing how the permittee implements different program elements such as construction site inspection and enforcement, routine inspection and maintenance of municipally owned and operated storm water management facilities, and street sweeping and catch basin cleaning.
 - **Organizational Chart (request if not on record).** Review staff organization to identify which staff and programs are responsible for the different program elements and how they relate to one another.
 - **SWPPP for Municipal Yard(s).** Review most current SWPPP and recommendations section. Note visual inspection frequency and inspection report form. Request copies of yard inspection reports if not available in recent annual reports.
 - **Permitting Authority Correspondence with Permittee.** Material may include recent comments on SWMP plan, annual reports, notices of violations, etc.
 - **Permitting Authority Inspections within MS4.** Compare any violations within the permittee's jurisdiction against DNR records.
 - **Permittee Web Sites.** May contain storm water reports, guidance documents, and other current information on the permittee's program.
 - **Special Water Quality Concerns.** Determine if the MS4 discharges to any water bodies classified as impaired waters (and if a TMDL exists), high quality, protected, or other water quality designations.
- B. **Complete MS4 Program Evaluation Checklist (See Exhibit A).** Modify to include comments section and indicate if additional information – documentation request should be made with notification. Use to generate specific information needs from MS4.

Step 3 – NOTIFICATION

- A. Call the MS4 representative to discuss the planned MS4 evaluation. Accomplish the following:
- Explain scope and purpose of evaluation, explain context within regional, statewide, and EPA national initiatives.
 - Discuss who should attend (e.g., municipal staff, elected officials, day to day staff, consultants, program managers, inspectors, administrative staff, outreach specialists, legal staff).
 - Confirm availability.

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- B. Send written communication (email or letter) setting date and time, location, identify appropriate attendees, and make specific documentation requests based on review of existing materials – **See Exhibit B for Notice of Program Evaluation Letter.**
- C. Include an agenda with the correspondence - **See Exhibit C for Sample Agenda.**

Step 4 - EVALUATION PREPARATION

- A. Expand program review from screening in Step 2 after receiving additional requested information obtained during Step 3.
- B. Highlight worksheet sections (**See Exhibit D: MS4 Program Evaluation Worksheets**) where a more in-depth discussion during the evaluation is needed.

Worksheets

Each worksheet is an optional guide for the evaluator to use to prepare for the evaluation and can be used later while conducting either a detailed evaluation or program-specific inspections of the MS4 storm water program. Additional questions may be necessary based on local regulations, permit requirements, water quality issues, etc. The worksheets may be used in highlighting program deficiencies and recommendations, as well as providing an initial structure to the MS4 evaluation report.

The worksheets cover the following program components:

- **Public Education and Outreach/Public Involvement and Participation**
- **Illicit Discharge Detection and Elimination**
- **Construction Site Pollutant Control/Post-Construction Storm Water Management**
- **Pollution Prevention**
 - **Storm Water Facility Inspections**
 - **Collection Services**
 - **Winter Road Management**
 - **Department of Public Works Yards & Other Municipally Owned Properties**
 - **Turf Management**
 - **Internal (Staff) Education & Communication**
- **Storm Water Quality Management/Modeling**
- **Storm Sewer System Map**
- **TMDL Planning and Implementation**

- C. Develop inventory of requested and received documentation (documents may be added during and immediately following the evaluation). Inventory should become part of the evaluation summary.

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- D. Hold internal pre-evaluation call with evaluators and supervisor.
- E. Hold external pre-meeting call with the MS4 to finalize meeting location and logistics:
 - Inspection activities in field can be time consuming due to travel times between sites and facilities. Consider their proximity, plan routes, vehicles and parking
 - 2-4 hours assumed for in-depth review of each program component
 - Normally 4 hours per construction, industrial/commercial field visit
 - 1-2 hours municipal public works yard

Start meeting location where most records are housed so that information can be accessed quickly if requested during meeting

Step 5 – MEETING

A. PROGRAM ASSESSMENT (EVALUATION)

- Start with introductions to ensure all personnel are either at the meeting or can quickly be present if needed. Ask the lead from the MS4 to explain the overall inter-governmental structure as to how it relates to the permit.
- Explain again the overall scope and purpose of the evaluation, including the sequence of events and overall timeframe from evaluation start to completion. The purpose of the evaluation is to collect information and make objective observations concerning implementation and maintenance of the program elements being evaluated. Explain that a compliance determination will be made separately from the evaluation summary.
- Discuss ALL permit program areas, emphasizing areas found in screening step that needed attention using the worksheets (see part B. below) as a guide to structure the discussion. Try to maintain a consistent structure to the discussion across the different program elements to help solicit more clear and complete responses from the MS4 participants. If a response is unclear or if it suggests that supporting documentation is needed, then it is important at this time to request the documentation, and note the request for the closing discussion.
- Note any instances of insufficient program documentation, insufficient internal training and program awareness, inconsistencies in program implementation as related to submitted procedural documents.
- You can refer back to the noted worksheets used in preparation.

B. FIELD INSPECTIONS

- Construction sites
 - Inspect 2 to 3 sites are recommended with one being a municipal project (if possible).

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- Have inspector conduct an inspection as they normally would and note observations of inspector's knowledge/training, documentation, and interaction with the permittee.
- DO NOT point out missed EC issues during the inspector's inspection. Do this afterwards. Request a copy of inspection report.
- IDDE
 - Ask to see field test kit and have them inspect 2 to 3 outfalls, make visual observations, and take sample if warranted by screening procedures.
- Municipal yards
 - Compare SWPPP with observed pollution sources and source area, drainage, and outfall controls.
 - Request to see spill skit.
 - Pull storm sewer manhole covers to observe collected material in catch basins (if applicable).
 - Inspect the following:
 - Vehicle and equipment washing
 - Vehicle and equipment maintenance
 - Collection of yard debris and organic material
 - Used oil recycling area and secondary containment
 - Collection of street sweepings and catch basin cleanings
 - Leaking equipment/staining
 - Salt storage facility and evidence of salt drag out
 - Inlet protection and other temporary BMPs that require frequent maintenance
 - Assess maintenance needs of any permanent structural BMPs.
- Post-Construction Storm Water Management Facilities
 - Inspect 1 to 2 muni-owned and operated storm water BMP
 - If possible, 1 should be a privately owned BMP with MS4 maintenance agreement for inclusion in modeling

Step 6 - REPORT

A. Compile Evaluation Report

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- **See Exhibit E: Post-Evaluation Summary Letter.** Formal letter should be sent within 30 days of evaluation and also placed in permit file.
- Letter should include all noted/observed deficiencies as well as areas of successful program implementation. If there are immediate actions needed to remove a threat to public health and safety or to the environment, then these should be made ahead of the letter, during the meeting, and then documented quickly in a follow-up email and Case Activity Report. If there are no program deficiencies, then document this condition in the letter. (See Table 1 in Exhibit E: Post-Evaluation Summary Letter.)
- If non-compliance conditions exist, request written response to evaluation summary within 30 calendar days.
- Include inventory of requested and received program documents (see Table 2 in Exhibit E: Post-Evaluation Summary Letter).
- Include any photos and descriptions taken during inspection as exhibits.
- Include other documents as needed if making specific reference to them in the summary letter.

NOTE: Try to avoid using phrases such as “it appears...,” “seems to...,” and “it was unclear...” to keep the observations objective. If you are unsure of what you are seeing in the field or summarizing a take home point of a discussion, then pause the inspection or discussion and ask for clarification and supporting documentation.

B. Record Keeping in SWAMP

- Enter evaluation into *SWAMP Event Tracker*.
- From the main SWAMP navigation screen, choose *Event Tracker* and search for the facility. When the facility appears, click on it and click the *Open* button.
- Highlight *Contact Event* and continue to the next step. If you do not see *Contact Event*, right click in the white area on the upper portion of the screen and click on *Insert*.
- Click the *Event Type* pull down menu and choose *Contact Event*. Enter text into the *Comp. Schedule/Event Title* to read *Contact Event*. Click *Save*.
- Click the *Insert Event* button. A drop-down list of Events relating to the *Event Type* will appear.
- Highlight the appropriate *Action Item* (MS4 Program Evaluation) and click *OK*. Click *Save*.
- Save the **Post-Evaluation Summary letter** into *SWAMP Permit Documents*.
- From the main SWAMP navigation screen, choose *Permit Documents* and search for your facility. When your facility appears, click on the facility and click the *Open* button.
- Click on the *Documents* tab. Right click in the grey area and choose *Insert*.
- Click on the *Other Documents* folder and click *Next*.

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- Browse for the appropriate file, fill out the appropriate descriptors, and *Generate* the document. Click the red X to close out, and the document should be listed in the *Documents* tab.

C. Evaluator(s) Debrief with Supervisor.

Step 7 – COMPLIANCE DETERMINATION

- **Conducting an MS4 Program Evaluation is a time intensive process. It is important to make sure that any program deficiencies are clearly identified so that the resulting direction from the Department is measurable, attainable, and realistic and specifies a timeframe in which to comply.**
- Documentation of the complete process, including the written response to the summary, will be used to make a compliance determination under separate letterhead with consideration of the Department's stepped enforcement process.
- If non-compliant item(s) warrant a Notice of Noncompliance (NON), then the evaluator(s) should send a NON to the MS4 identifying the issues by reference to the summary letter, corrective actions, and a timeline for achieving compliance.
- If non-compliant item(s) warrant a Notice of Violation (NOV), then the evaluator(s) should generate an Environmental Enforcement (EE) request. The EE Specialist will determine if a Notice of Claim will also need to be served with the NOV.

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Exhibit A: MS4 Program Evaluation Checklist

MS4 Program Evaluation Preparation Checklist

The intent of a Municipal Separate Storm Sewer System (MS4) evaluation is to determine compliance with the Wisconsin Pollutant Discharge Elimination System (WPDES) permit. In order to help staff prepare for an MS4 program evaluation, feel free to use this preparation checklist. If you do not have all of the following items, a document request should be made with the notification letter.

- A copy of the MS4 Permit
- A copy of the permittee's Annual Report
- A copy of the Storm Water Management Plan
- A copy of the current Public Education and Outreach Plan/Policy/Procedures
- A copy of the current Public Involvement and Participation Plan/Policy/Procedures
- A copy of the current Illicit Discharge Detection and Elimination Plan/Policy/Procedures
- A copy of the current Construction Site Pollutant Control Plan/Policy/Procedures
- A copy of the current Post-Construction Storm Water Management Plan/Policy/Procedures
- A copy of the current Pollution Prevention Plan/Policy/Procedures
- A copy of the current Storm Water Quality Management Program (modeling)
- A copy of the current Storm Sewer System Map
- A copy of any cooperative agreements with other communities to achieve compliance with permit conditions or assist in achieving compliance with permit conditions
- Copies of any applicable ordinances or other regulatory mechanism for MS4 permit conditions
For example: construction, post-construction, illicit discharge, etc.
- Copies of any checklists/worksheets used by the Municipality to implement the storm water program
For example: post-construction review checklist, point source screening checklist/worksheets, etc.
- Copies of applicable Standard Operating Procedures for internal or external processes
For example: construction site inspection frequency, post construction evaluation, application review, internal communications, etc.

Exhibit B: Notice of Program Evaluation Letter

[DATE]

[WPDES Permit No. WI-XXXXXX]
[FID Number]

[FACILITY CONTACT]
[MUNICIPALITY NAME]
[MAILING ADDRESS]
[CITY], WI [ZIP]

SUBJECT: Confirmation of Evaluation Meeting for [MUNICIPALITY NAME]
Municipal Separate Storm Sewer System (MS4) Permitting Program

Dear [FACILITY CONTACT]:

As discussed in our recent communication, the Wisconsin Department of Natural Resources Storm Water Program confirmed the on-site evaluation of the [LOCATION NAME's] MS4 Storm Water Program on [DATE(s)] from [TIME] at [PLACE]. We have confirmed that the appropriate municipal staff will be available to attend, including [LIST JOB TITLES].

The intent of this evaluation is to discuss the municipal storm water permit under which your municipality has coverage, answer any questions you might have about the permit and storm water related issues within your municipality, and evaluate compliance with the MS4 permit. This evaluation will include conversation with appropriate staff, review of relevant documentation, and a detailed inspection of the programs administered as part of your MS4 permit.

Following the evaluation meeting, a letter will be sent summarizing the findings of the evaluation.

If you have any questions prior to our meeting, please feel free to call or email me at [PHONE NUMBER] or [EMAIL].

Sincerely,

[STAFF PERSON NAME]
[TITLE]

cc: [NAME(S), TITLE(S)]

Exhibit C: Sample Agenda

Agenda for
 MS4 Program Audit for WPDES Permit No. WI-XXXXXXX-0X
 FULL MUNICIPALITY NAME
 Meeting Location
 Address
Month DD – DD, YEAR

Date/Time	Program/Agenda Item
July 19, 2016	
9:00 – 9:15	Introductions & Opening to Meeting (Office)
9:15 – 9:30	Review Permit Structure & Organizational Chart (Roles & Responsibilities) (Office)
9:30 – 10:00	Pollution Prevention (Office)
10:00 – 10:30	Storm Water Quality Management (Office)
10:30 – 10:45	Public Education and Outreach (Office)
10:45 – 11:15	Illicit Discharge Detection and Elimination (Office)
11:15 – 11:45	Post-Construction Storm Water Management (Office)
11:45 – 12:15	Construction Site Pollution Control (Office)
12:15 – 12:30	Logistics and Planning for Afternoon Field (Office)
12:30 – 1:30	Lunch Break
1:30 – 2:15	Pollution Prevention (Field)
2:15 – 4:00	Construction Site Pollutant Control (Field)
4:00 – 4:30	Storm Water Quality Management (Field)
July 20, 2016	
9:00 – 9:15	Logistics and Planning for Field (Office)
9:15 – 11:45	Time reserved for field activities as needed (Field)
11:45 – 12:15	Office follow-up and additional records review (Office, as needed)
12:15 – 12:45	Break – Closing Conference Preparation (Office)
12:45 – 1:15	Closing Conference (Office)

Exhibit D: MS4 Program Evaluation Worksheet – Optional

Public Education and Outreach/Public Involvement and Participation

Permittee: _____

DNR Staff Representatives:

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
<p>Who is the main person responsible for overseeing the implementation of the public and staff education and outreach programs?</p> <p>Provide name and contact information:</p>	
<p>Are there any other municipal departments that are involved in implementation of the E/O and public involvement plan?</p> <p>Are you a member of a MS4 consortium? If so, how do you stay involved?</p>	
<p>Describe your overall approach to educating the public on storm water issues:</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Public Education & Outreach/Involvement & Participation Program Continued

<p>Have any specific storm water messages been developed for the following elements:</p> <ul style="list-style-type: none"> ✓ Illicit discharges ✓ Homeowners education: automobiles, pet waste, household hazardous waste, and household practices, on-site reuse of leaf and grass clippings, proper use of lawn and garden fertilizers and pesticides, infiltration of residential storm water runoff ✓ Management of stream banks and shorelines by riparian landowners ✓ Construction site erosion control practices and storm water management facilities ✓ Educate specific audiences on methods of storm water pollution prevention ✓ Promote environmentally sensitive land development designs (green infrastructure and low impact development) 	
<p>What delivery/distribution mechanisms are used?</p> <ul style="list-style-type: none"> ✓ Is distribution tracked? ✓ How? 	<p style="text-align: center;">Yes No</p>
<p>How do you evaluate the effectiveness of your outreach activities?</p> <p>Have you conducted any public awareness surveys?</p>	
<p>Describe how your public is made aware of MS4 permit issues:</p>	
<p>Are meetings where storm water issues are discussed appropriately public noticed?</p>	
<p>Do community members have the opportunity to see your annual report before it is submitted to the Department? If so, how?</p>	
<p>Describe storm water-related volunteer activities:</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional

Illicit Discharge Detection and Elimination (IDDE) Program

Permittee: _____

DNR Staff Representatives: _____

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
<p>Who is the main person responsible for overseeing implementation of the IDDE program?</p> <p>Provide name and contact information:</p>	
<p>How do you confirm appropriate staff (DPW, parks, building, etc.) know how to implement the IDDE program?</p> <p>Is there training? If so, at what frequency?</p> <p>How are IDDE actions/efforts coordinated across the various departments?</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Illicit Discharge Detection and Elimination (IDDE) Program continued

Legal Authority	
Question	Response
<p>Is there an ordinance (or other legal authority) preventing and eliminating illicit discharges and connections to MS4?</p> <p>Title and section or chapter: Year revised:</p>	<p>Yes No</p>
<p>Does the ordinance:</p> <ul style="list-style-type: none"> ✓ Prohibit illicit discharges? ✓ Prohibit the discharge, spilling or dumping of non-storm water substances or materials in to waters of the state or MS4? ✓ Allow exclusions (non-storm water discharges)? If so, which ones (i.e., fire-fighting, irrigation water, car washing)? 	<p>Yes No</p> <p>Yes No</p> <p>Yes No</p>
<p>Have you run into any problems implementing the ordinance?</p>	
<p>Are there official enforcement plans or procedures in place?</p> <ul style="list-style-type: none"> ✓ Where are they written (i.e., ordinance, SOP, manual)? 	<p>Yes No</p>
<ul style="list-style-type: none"> ✓ Types of enforcement mechanisms available: 	<p>Notices of Violations (NOV) Yes No</p> <p>Administrative fines Yes No</p> <p>Stop-work orders Yes No</p> <p>Civil penalties Yes No</p> <p>Criminal penalties Yes No</p> <p>Other:</p>
Public Awareness and Reporting	
Question	Response
<p>Is there a spill reporting hotline? How/where is it advertised?</p> <p>How are complaints handled if they are outside of normal business hours?</p>	<p>Yes No</p>

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Illicit Discharge Detection and Elimination (IDDE) Program continued

<p>Is there a complaint tracking database or system?</p> <p>Describe:</p>	<p style="text-align: center;">Yes No</p>
<p>Describe any outreach efforts to educate the public about illicit discharges:</p>	
<p>Illicit Discharge Investigation and Spill Response</p>	
<p>Question</p>	<p>Response</p>
<p>Describe your illicit discharge investigation and spill response programs, including staff and equipment available.</p>	
<p>How are the locations of illicit discharges tracked and used to steer other SWMP components (i.e., public education, industrial inspections, etc.)?</p>	
<p>Describe any field screening activities. If an illicit discharge is discovered during screening, what is the process for determining the source and eliminating the discharge?</p>	
<p>Dry Weather Screening</p>	
<p>Question</p>	<p>Response</p>
<p>Is dry weather field screening used to detect illicit discharges?</p>	<p style="text-align: center;">Yes No</p>
<p>How do you perform dry weather screening?</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Illicit Discharge Detection and Elimination (IDDE) Program continued

<p>How many point sources do you have?</p> <p>What is the frequency and extent of field screenings? (i.e., 30% of major outfalls annually):</p>		
<p>As part of the IDDE inspection, review complete paperwork trails for several illicit discharge events (such as a spill and an unknown illicit discharge in the storm sewer system). Determine if the full investigation process was documented and if adequate enforcement actions were taken when required.</p>		
<p>Illicit Discharge Case File #1:</p>		
<p>Summarize illicit discharge event:</p>		
<p>Full investigation process documented?</p>	<p>Yes</p>	<p>No</p>
<p>Source determined?</p>	<p>Yes</p>	<p>No</p>
<p>Enforcement action taken?</p>	<p>Yes</p>	<p>No</p>
<p>Illicit Discharge Case File #2:</p>		
<p>Summarize illicit discharge event:</p>		

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Illicit Discharge Detection and Elimination (IDDE) Program continued

Full investigation process documented?	Yes	No
Source determined?	Yes	No
Enforcement action taken?	Yes	No

Exhibit D: MS4 Program Evaluation Worksheets - Optional

Construction Site Pollutant Control/Post-Construction Storm Water Management

Permittee: _____

DNR Staff Representatives: _____

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Construction Site Erosion Control	
Question	Response
Who is the main person responsible for overseeing the implementation of the Construction Site Pollutant Control program? Who is responsible for review of construction site erosion control plans? Who is responsible for construction site inspection? Provide name and contact information:	
Is there an ordinance requiring erosion and sediment control at construction sites > 1 acre and to sites < 1 acre that are part of a larger common plan of development?	Yes No
Are the exemptions in the ordinance consistent with NR 151 and NR 215?	Yes No
Does the ordinance have: ✓ Minimum control measure requirements? ✓ Requirements for erosion and sediment control that are at least as stringent as NR 151.11(6m) and NR 151.2(4m)? ✓ Erosion control plan requirements for landowners, equivalent to those contained	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Construction Site Pollutant Control/Post-Construction Storm Water Management continued

<p>in NR 216.46?</p> <ul style="list-style-type: none"> ✓ Procedures for submittal and review of plans as part of permit application? ✓ Applicant self-inspection requirements consistent with NR 216.46(9)? ✓ Provide authority to enter property for the purposes of inspecting construction sites? ✓ Municipal inspection frequency minimums? ✓ Effective enforcement mechanisms that will be used to obtain compliance? ✓ Who has authority to implement enforcement? ✓ Option for the municipality to address urgent issues and bill costs to the permittee? ✓ Application fees and/or inspection fees required? 	
<p>Implementation procedures:</p> <ul style="list-style-type: none"> ✓ Is the implementation procedure written? How would a developer find out what is required? ✓ Do applications include erosion control plan submittal? ✓ If so, do plans get reviewed? ✓ If so, by whom? ✓ How many (All? Subset? Number?) ✓ What is the process if the submitted plan does not meet the objectives of the ordinance? ✓ Is there communication with local DNR storm water staff regarding submitted plans? ✓ Is there field compliance monitoring? ✓ If so, by whom? ✓ How many (all? Subset? Number?) ✓ Number in compliance? Not in compliance? ✓ Actions taken for non-compliant sites? ✓ Is there a mechanism for termination of stabilized sites? 	
Post-Construction Storm Water Management	
Question	Response
<p>Who is the main person responsible for overseeing the implementation of the Post-Construction Storm Water Management program?</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Construction Site Pollutant Control/Post-Construction Storm Water Management continued

Provide name and contact information:	
<p>Is there an ordinance regulating post-construction storm water discharges from new development and redevelopment > 1 acre and to sites < 1 acre if they are part of a larger common plan of development?</p> <p>Are the exemptions in the ordinance consistent with NR 151 and NR 216?</p>	<p style="text-align: center;">Yes No</p>
<p>Does the ordinance have:</p> <ul style="list-style-type: none"> ✓ Procedures for site planning which incorporate consideration of potential water quality impacts? ✓ Requirements for source area controls and regional BMP's? ✓ Requirements for design and implementation of post-construction storm water management control devices that are either consistent with NR 216.47, NR 151.122 through 151.126 and NR 151.242 through 151.246 or the Department's Technical Standards found at (insert link)? ✓ Long-term maintenance requirements including routine inspection and maintenance of privately owned BMP's? 	
<p>Implementation:</p> <ul style="list-style-type: none"> ✓ Do applications include post construction storm water management plan submittal? ✓ If so, do plans get reviewed? By whom? ✓ How many (all? subset? number?) ✓ What is the process if the submitted plan does not meet the objectives of the ordinance? ✓ Is there communication with local DNR storm water staff regarding submitted plans? ✓ Are as-built plans required for post-construction BMP's? ✓ What is the procedure for long-term maintenance? ✓ Is there field compliance monitoring? ✓ If so, by whom? ✓ How many (all? Subset? Number?) 	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Construction Site Pollutant Control/Post-Construction Storm Water Management continued

<ul style="list-style-type: none">✓ Number in compliance? Not in compliance?✓ Actions taken for non-compliant sites?✓ How are maintenance inspections documented?	
---	--

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Storm Water Facility Inspections

Permittee: _____

DNR Staff Representatives: _____

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
<p>How often are municipally owned storm water facilities inspected?</p> <p>Who does the inspections? Provide name and contact information:</p> <p>What is included in the inspections?</p>	
<p>How often are privately owned storm water facilities inspected?</p> <p>Who does the inspections? Provide name and contact information:</p> <p>What is included in the inspections?</p>	
<p>How are inspections and maintenance documented?</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Collection Services (Leaf Collection Program, Street Sweeping, and Catch Basins)

Permittee: _____

DNR Staff Representatives: _____

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
<p>What department is responsible for the collection services?</p> <p>Provide name and contact information:</p>	
<p><u>Leaf Collection Program</u>: Describe the yard collection programs in your municipality.</p> <p>Who decides when leaf pickup begins?</p> <p>When and how often are leaves collected?</p> <p>What equipment is used? Is tonnage tracked?</p> <p>Where are leaves stored prior to collection (terrace, bags, gutter)?</p> <p>Where are leaves stored post-collection? Does the facilities' SWPPP describe the management of the material?</p> <p>Are streets swept immediately after leaf collection?</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Collection Services continued

<p><u>Street Sweeping Program</u>: Describe the street sweeping program in your municipality.</p> <p>When and how often does the service occur?</p> <p>What equipment is used?</p> <p>Are there parking requirements?</p> <p>Are the collection services consistent with the modeling plan?</p> <p>Where are item stored before pick up? Staged before disposal?</p> <p>Is tonnage tracked?</p>	
<p><u>Catch Basin Cleaning Program</u>: Describe the program in your municipality.</p> <p>When and how often does the service occur?</p> <p>What equipment is used?</p> <p>Is the service consistent with the modeling plan?</p> <p>Where do the collections go for disposal? Does the facilities' SWPPP describe the management of the material?</p> <p>Is tonnage tracked?</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Winter Road Management

*Annual Report screening recommended to be completed. Information on this worksheet is also requested for on the annual report form.

Permittee: _____

DNR Staff Representatives:

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
<p>Who is the main person responsible for overseeing the winter roadway maintenance?</p> <p>Provide name and contact information:</p>	
<p>Describe the types of products used for winter road management (e.g., deicing, pre-wetting, salting, etc.).</p> <p>Report the amount of product used per winter month.</p>	
<p>Describe the type of equipment used to apply the products.</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Winter Road Management continued

<p>Describe any anti-icing, equipment calibration, and salt reduction strategies used or considered.</p>	
<p>Report the snow disposal locations, if snow is hauled away. Describe runoff management at those sites.</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional

Pollution Prevention – Public Works Yards & Other Municipally Owned Properties

Permittee: _____

DNR Staff Representatives:

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response	
Who is the main person responsible for overseeing the pollution prevention at public works yards? Provide name and contact information:		
Has an inventory of storm water management facilities been completed (i.e., facilities owned and operated by the MS4)? Types of facilities included:	Yes	No
Are the facilities inspected? Frequency? Checklist used?	Yes	No
Does each facility have a storm water pollution prevention plan (SWPPP)?	Yes	No

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Public Works Yards & Other Municipally Owned Properties
continued

A map of each facility, drawn to scale. (May be in SWPPP copies.)	<p style="text-align: center;">Yes No</p>
Describe any good housekeeping activities or best management practices installed to reduce or eliminate storm water contamination at the facilities. (May be in SWPPP copies.)	
Describe any spill prevention and response procedures at the facilities.	
How are employees trained on SWPPP measures and spills prevention and response?	
See next worksheet – Turf Management	

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Turf Management

Permittee: _____

DNR Staff Representatives: _____

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response	
<p>Who is the main person responsible for overseeing the implementation of the management of lawn and garden fertilizers on municipally owned property?</p> <p>Provide name and contact information:</p>		
<p>Does the city have any properties \geq 5 acres that are municipally managed? If so, how many?</p> <p>Describe the chemical storage (pesticides, herbicides, etc.)</p>	Yes	No
<p>Is there an ordinance regarding fertilizer management on municipally-controlled properties \geq 5 acres?</p>	Yes	No
<p>If not, how do you implement this program? Are soil tests done for these properties?</p>	Yes	No
<p>Are there nutrient application schedules for each one? If not, why?</p>	Yes	No
<p>Do you have an evaluation program to assess the health of your turf and gardens?</p>	Yes	No

Exhibit D: MS4 Program Evaluation Worksheet – Optional
Pollution Prevention – Internal (Staff) Education & Communication

Permittee: _____

DNR Staff Representatives:

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
<p>Who is the main person responsible for overseeing the implementation of the internal staff education and communication programs?</p> <p>Provide name and contact information:</p>	
<p>Describe your training program:</p> <p>How many training sessions do staff participate in annually (in-house and/or externally)?</p> <p>How do you evaluate the effectiveness of staff training?</p> <p>Topics covered this past year:</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional

Storm Water Quality Management/Modeling

*DNR evaluator should review the permittees status on modeling information that has already been submitted to the DNR before evaluation meeting.

*This worksheet may be combined with the MS4 Storm Sewer System Map and TMDL Planning and Implementation worksheets.

Permittee: _____

DNR Staff Representatives:

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response						
Who is the main person responsible for overseeing: (1) the storm water quality management implementation and (2) modeling? Provide name and contact information:							
Has the municipality completed a pollutant-loading analysis to assess compliance with the 20% TSS reduction developed urban area performance standard? What are the present TSS reduction levels? Has the DNR reviewed the latest modeling performance by the permittee? Has the DNR confirmed that 20% TSS reduction has been met? If yes, continue to implement TSS reduction measures.	<table border="0"> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td>Yes</td> <td>No</td> </tr> </table>	Yes	No	Yes	No	Yes	No
Yes	No						
Yes	No						
Yes	No						

<p>If no, describe the actions the municipality is taking to achieve the 20% standard.</p> <p>Will additional TSS reduction management measures be implemented in the next couple years?</p>	
<p>Describe the maintenance program and any maintenance activities that have occurred for installed storm water best management practices.</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional

MS4 Storm Sewer System Map

* This worksheet may be combined with the Storm Water Quality Management / Modeling and TMDL Planning and Implementation worksheets.

Permittee: _____

DNR Staff Representatives: _____

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
<p>Who is the main person responsible for overseeing the storm sewer system map?</p> <p>Provide name and contact information:</p>	
<p>Is there a sufficiently sized and detailed map with a scale suited for the level of detail depicting the following information:</p> <ul style="list-style-type: none"> ✓ A boundary defining the final urban storm water planning area and all municipal borders in the area. ✓ Identification and boundaries of the storm water drainage basins, the watersheds and municipal separate storm sewer systems. Other major municipal, government or privately owned storm water conveyance systems lying within, but not owned or operated by the permittee shall also be identified. 	

Exhibit D: MS4 Program Evaluation Worksheet – Optional

Storm Sewer System Map continued

<ul style="list-style-type: none">✓ A list and location of all municipal storm sewer system outfalls discharging to waters of the state. Indicate the pipe size and identify those outfalls which are considered major outfalls. ✓ The location and permit number of any discharge to the municipal separate storm sewer system that has been issued a WPDES permit, or has filed a permit application with the department. ✓ The location of major structural controls for storm water discharges including retention basins, detention basins and major infiltration devices. ✓ Identification of publicly owned parks, recreational areas and other open lands. ✓ The location of publicly owned public works facilities. ✓ Other potential sources of pollutants.	
<p>How are the maps used (i.e., tracking illicit discharges)?</p>	
<p>Does the map have sufficient labeling of streets and features to be usable?</p>	

Exhibit D: MS4 Program Evaluation Worksheet – Optional

TMDL Planning and Implementation

*TMDL planning and implementation is to be reported in the annual report. Annual Report screening recommended to be completed in Step 1: Preparation to help determine which permittee should be evaluated, or during Step 3: Program Review to become familiar with the permittee’s program prior to the evaluation meeting.

*DNR evaluator should review whether permittee is affected by an approved TMDL and whether any associated MS4 TMDL modeling has been submitted to the DNR before this meeting.

*This worksheet may be combined with the MS4 Storm Sewer System Map and Storm Water Quality Management/Modeling worksheets.

Permittee: _____

DNR Staff Representatives:

FIN: _____

Date: _____

MS4 Evaluation Participants		
Name	Department	Phone Number & Email

Question	Response
Is the permitted area part of an approved TMDL area? If yes, who is the main person responsible for overseeing TMDL implementation? Provide name and contact information:	
Which TMDL reachsheds overlap with the permitted area? Have you completed modeling for these areas? How close are you to the TMDL pollutant reduction goals? What MS4 TMDL percent reduction targets apply to the permittee?	

Exhibit D: MS4 Program Evaluation Worksheet – Optional

TMDL Planning and Implementation continued

<p>Has updated MS4 modeling been done to assess MS4 TMDL compliance?</p> <p>Have the MS4 TMDL target reductions been met?</p> <p>Has a plan been developed to guide the permittee on what additional management measures should be implemented by the permittee?</p> <p>What additional storm water management measures are expected to be implemented in the next couple years to reduce TMDL pollutants of concern?</p>	
<p>What is being done to show progress toward meeting the TMDL?</p>	

Exhibit E: Post-Evaluation Summary Letter

[DATE]

[WPDES Permit No. WI-XXXXXX]

[FID Number]

[FACILITY CONTACT], [TITLE]

[MUNICIPALITY NAME]

[MAILING ADDRESS]

[CITY], WI [ZIP]

SUBJECT: [MUNICIPALITY NAME] MS4 Permit Program [Notice of Noncompliance &]
Evaluation Summary

Dear [FACILITY CONTACT]:

On [DATE], Department of Natural Resources (Department) staff met with [MUNICIPALITY NAME] ([City, Village, Town]) representatives to evaluate implementation of the [City's, Village's, Town's] MS4 Permit Program. This evaluation was conducted through the Department's authority under Sections 3.12 and 3.13 of the permit. [During the evaluation, areas of non-compliance were noted as reflected in Table 1 of the enclosed summary. The "Required Actions" listed in the table are necessary to comply with the permit. Recommendations are also made in this table. Please review this information carefully as it is intended to help inform the [City's, Village's, Town's] internal processes and procedures to improve overall consistency and effectiveness of the MS4 Permit Program.]

The evaluation was attended by:

Department Staff

[DNR STAFF PERSON NAME – TITLE, WATER DISTRICT REGION]

[DNR STAFF PERSON NAME – TITLE, WATER DISTRICT REGION]

Village Staff

[VILLAGE STAFF PERSON NAME – TITLE]

[VILLAGE STAFF PERSON NAME – TITLE]

Village Contracted Staff

[VILLAGE STAFF PERSON NAME – TITLE]

[VILLAGE STAFF PERSON NAME – TITLE]

Please provide a written response within thirty (30) days of receipt of this letter addressing efforts on behalf of the [City, Village, Town] to resolve any issues described in the summary.

Thank you for your cooperation with the Department's Municipal Storm Water Management Program. If you have any questions or concerns regarding this letter, please contact me at [PHONE NUMBER] or [EMAIL].

[STAFF PERSON NAME]

[TITLE]

Exhibit E: Post-Evaluation Summary Letter

Enclosure: [YEAR] [MUNICIPALITY NAME] MS4 Permit Program Evaluation Summary Report w/ exhibits

cc: [NAME(S), TITLE(S)]

[Page Break: Leave page in between intentionally blank.]

BACKGROUND

Summarize MS4 permitting background.

Example: There are [#] permitted MS4s in [REGION] Region, including the [#] communities covered under the newly issued MS4 General Permit. Programs were first developed in the [Milwaukee region] in the 1990's under Phase I permits in accordance with the Clean Water Act and Wisconsin's delegated NPDES permitting authority under EPA. Storm water runoff pollution (rural and urban) contributes to [#] percent of the stream miles in [REGION] Region listed as impaired. Common pollutants of concern causing these impairments are [ex: chlorides, total phosphorus, total suspended solids (TSS), and bacteria (fecal coliform or E.Coli as indicators)]. Increases in impervious area, traffic volumes, and development density and non-residential uses associated with urbanized areas contribute additional pollutant generation and runoff which municipal separate storm sewer systems convey, in many cases directly without treatment, to surface waters. If a waterway is not impaired, it is expected that this program will sustain existing water quality in the receiving resource. The purpose of the MS4 permit program is to bring awareness to potential causes of and resolutions to urban runoff pollution and to minimize, with the ultimate goal of eliminating, pollution in runoff discharged from the MS4. This is done by introducing enhanced storm water management planning, implementation, and establishing measurable goals in what are typically already existing municipal operations. By periodically inspecting these programs, the Department intends to accomplish three primary objectives:

1. Program Compliance - *Determine compliance with the MS4 permit*
2. Program Consistency - *Gain a better understanding of the written municipal procedures as it relates to the permit and program implementation, both for the MS4 being inspected (MS4 benefit) and for comparison against other programs statewide (DNR and MS4 benefit)*
3. Program Efficacy - *Improve operations to meet statewide water quality performance standards and targets established in local water quality planning efforts.*

The [MUNICIPALITY NAME] was first permitted in [MONTH YEAR] under the Department's Storm Water Municipal General Permit, WPDES Permit Number [PERMIT NO.], and was reissued coverage under the general permit (WPDES Permit Number [PERMIT NO.]) on [DATE]. The US Census Bureau estimated a 2015 population of the [City, Village, Town] at [POPULATION #] with a 2010-listed population density of [POPULATION DENSITY #] persons per square mile. According to the US Census Bureau's QuickFacts webpage, the [City, Village, Town] has experienced a population

Exhibit E: Post-Evaluation Summary Letter

growth of [PERCENT GROWTH #]% from 2010 to 2015 (See Exhibit [#] for Urbanized Area map in Mukwonago).

The [City's, Village's, Town's] MS4 discharges to [LIST WATERSHED, LAKES, RIVERS, etc.] and connected unnamed tributaries (See Exhibit [#]). The [LAKE, RIVER, etc.] are designated waters listed by the State as Area of Special Natural Resource Interest (ASNRI) for supporting endangered and threatened species. The downstream receiving resource, the [WATERBODY], is listed as an impaired waterway on the State's 303(d) list for [ex: sediments contaminated with PCBs and total phosphorus pollution from nonpoint (rural and urban) sources (See Exhibit #)]. Upstream of the [City, Village, Town] limits, the [WATERBODY] is listed as a Class II trout stream. Class II streams are capable of supporting natural reproduction, but stocking is required to maintain a desirable sport fishery. The [City, Village, Town] completed its [City, Village, Town] -Wide Storm Water Management Plan in [YEAR], and reports that on an average annual year total suspended solids are being reduced from the MS4 by [PERCENT #] percent to these waters.

The [City's, Village's, Town's] operating procedures under the MS4 permit were initially developed in [DATE] and [DATE] according to the permit compliance schedule, and there have not been any revisions made to these documents since that time. The [City's, Village's, Town's] MS4 program is primarily implemented by [the Village Engineer (Ruekert/Mielke)] and [the Village Department of Public Works Director]. The [City, Village, Town] Planner is involved in aspects of permitting as it relates to post-construction storm water management for development under the MS4 permit. The [City, Village, Town] explained that they are undergoing a large change (evolution) in operations to improve function for maintaining the Village's infrastructure at large, but this change will also benefit implementation of the MS4 program. This change was initiated approximately in 2012-2013 when Ron Bittner was hired as the DPW Director and when the [City, Village, Town] Board appointed John Weidl as the new [City, Village, Town] Administrator in May 2013.

As part of the audit, the Department reviewed the Village's existing legal authorities (ordinances), procedures for Illicit Discharge Detection and Elimination (IDDE) dry-weather field screening and response, procedures for construction site inspection and enforcement, public works yard Storm Water Pollution Prevention Planning (SWPPP), the MS4 map, and the 2015 MS4 Annual Report. These procedures were discussed specifically with the [City, Village, Town] staff implementing them (see attendance list in cover letter and Exhibit 1 for Agenda). The purpose of this discussion was to 1) obviate any inconsistencies between documented procedures and program implementation, 2) identify areas where program implementation is deficient in meeting the minimum permit requirements, 3) identify areas where the [City, Village, Town] is improving or excelling at MS4 program implementation, and 4) clear up any concerns or questions regarding a permit requirement, purpose and intent, and implementation. Additional documentation was requested during the course of the meeting and is reflected in Table 2. Office discussions were followed by field inspections which are documented in the proceeding exhibits.

OVERALL PROGRAM MANAGEMENT

- Describe current and ongoing MS4 permit contacts.

Exhibit E: Post-Evaluation Summary Letter

- Provide recommendations for how MS4 can maintain/improve their internal communications and public participation opportunities.

PUBLIC EDUCATION AND OUTREACH/PUBLIC INVOLVEMENT AND PARTICIPATION – MS4 GP SECTION XX

Summarize current I&E efforts, including whether it is being implemented independently or as part of a group (MAMSWaP, NEWSW, etc.).

Indicate where improvements should be made.

Remind MS4s to report in detail (including measurable goals and numbers, where appropriate) on **all** information and education activities conducted by the municipality (permit sections 2.1 and 2.9.1) and to include specific examples and/or copies & links to materials.

ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM – MS4 GP SECTION XX

Summarize current IDDE efforts and those areas that need improvement.

Examples:

- Submit a regulatory mechanism (ordinance or other) to prevent and eliminate illicit discharges. This was to have been submitted November 2008.
- Conduct “ongoing screenings” of outfalls (permit section 2.3.3). These ongoing screenings should have been started in November 2010. (Example if they haven’t: An ongoing dry weather field screening protocol should be developed and submitted to the attention of X no later than MM/DD/YYYY, and the ongoing screening should be initiated by MM/DD/YYYY; with results reported in the YYYY MS4 Annual Report.)

CONSTRUCTION SITE EROSION CONTROL – MS4 GP SECTION XX

Summarize current efforts and those areas that need improvement.

Examples:

- Track and report construction site erosion control inspections and enforcement numbers (permit section 2.9.3) in the annual report
- A requirement and compliance schedule to revise the county ordinance pertaining to Construction Site Storm Water Erosion Control will be included in the reissued MS4 permit.

POST-CONSTRUCTION STORM WATER MANAGEMENT – MS4 GP SECTION XX

Summarize current efforts and those areas that need improvement.

Examples:

- Track and report inspections and enforcement of post-construction storm water practices (permit section 2.9.3).
- A requirement and compliance schedule to revise the county ordinance pertaining to Post Construction Storm Water Management will be included in the reissued MS4 permit.
- Report on any action you take related to enforcing the long term maintenance of storm water facilities.

POLLUTION PREVENTION– MS4 GP SECTION XX

Summarize current efforts and those areas that need improvement.

Examples:

- The County prepared a municipal pollution prevention plan in 2008.
- Continue to report on measurable goals from the 2008 document (permit section 2.6).
- Update plan as necessary to include changes within municipality. Updated plans should be submitted with annual report, as appropriate.

STORM WATER QUALITY MANAGEMENT– MS4 GP SECTION XX

Example: Rock County has met the 20% TSS reduction requirement. The 40% TSS requirement that is detailed in s. NR 151.25(2)(4), is no longer enforceable due to the provisions of state budget bill 2011 Wisconsin Act 32. It should be noted, however, that if storm water treatment best management practices were in place as of July 1, 2011, and provide treatment beyond the 20% TSS reduction requirement, those practices must continue to be maintained. The SLAMM model will need to be re-run to show compliance with Rock River TMDL requirements, but you may want to wait to complete this task until the TMDL modeling guidance is distributed.

STORM SEWER SYSTEM MAP– MS4 GP SECTION XX

Summarize current map quality and where improvements could be made.

Example: The MS4 map that was submitted in 2008 has many of the required components. The map should be updated to include: [List missing items]. Map should be updated as necessary to reflect current conditions within the County. If the urban areas change as a result of the 2010 census, the map should be revised as needed. This can occur after urban area maps have been generated by EPA.

TMDL PLANNING AND IMPLEMENTATION– MS4 GP SECTION XX

Summarize how to better address an existing waste load allocation. (Provide recommendations for improvement or required actions to gain compliance.)

OTHER DISCUSSION (positive/commendable program elements)

Examples

- The current municipal storm water general permit (WI-S050075-2) is expired and is expected to be re-issued in the near future. The status of the Rock River TMDL was also discussed. It is expected that the re-issued permit will include language pertaining to the implementation of the TMDL. It is expected that the permit will allow municipalities to have the next permit term (possibly up to 5 years) for assessing and planning for meeting the TMDL allocations. It is also anticipated that beyond the initial planning phase, municipalities might be given up to three additional permit terms (15 years) to meet the TMDL waste load allocations provided continual progress is made toward complying with the WLAs with each permit term.

Exhibit E: Post-Evaluation Summary Letter

- There were no findings of note for a particular component: “No recommendations or requirements were identified for this program component.”
- Some circumstances may cause limitations during the MS4 program evaluation process, so it might not be possible to determine compliance with a program component: “Compliance with public education and participation permit requirements could not be determined because...”

TABLE 1. OBSERVATIONS & REQUIRED ACTIONS SUMMARY

Program & Permit Reference	Observations (A – Required Action*, B – Recommended Action) <i>*necessary to maintain compliance with referenced permit condition</i>
Example: Illicit Discharge Detection and Elimination MS4 GP Section 2.3.2	A.1 [INSERT REQUIRED ACTION] A.2 [INSERT REQUIRED ACTION] B.1 [INSERT RECOMMENDED ACTION] B.2 [INSERT RECOMMENDED ACTION]

[Page Break]

TABLE 2. DOCUMENTS REVIEWED & PROVIDED

Document Name	Document Date	Program & Permit Section
[INSERT DOCUMENT NAME]	[INSERT DOCUMENT DATE]	[LIST APPLICABLE PROGRAM AND PERMIT SECTIONS]

[Page Break]

EXHIBITS

(page left intentionally blank)

Note: Exhibits are attachments in the Post-Evaluation Summary Letter, which may contain any of the following:

- Agenda for MS4 Program Evaluation
- Construction Inspection Photo Logs (Municipality)
- Construction Inspection Photo Logs (DNR)
- Erosion Control Inspection Reports
- Construction Plans
- Department of Public Works Yard Photo Log
- Storm Water BMP Field Inspection Photo Log (DNR)
- MS4 Storm Water Map
- IDDE Field Screening Sheets
- US Census Bureau Urbanized Area Map
- Public Waters Map
- Designated and Impaired Water Map
- Copies of Reviewed Documents (as listed in Table 2)

References

Alwin, Christe. Michigan Department of Environmental Quality. Email correspondence February 13, 2013.

Anderson, Tamara. California Regional Water Quality Control Board, Central Coast Region. Email correspondence January 8, 2015.

Colorado Stormwater Council. Email correspondence with Benjamin Benninghoff, Wisconsin DNR Runoff Management Supervisor, January 15, 2015.

Karnowski, Marni. Minnesota Pollution Control Agency. Phone conversation February 5, 2013.

Kaufmann, Wayne. Illinois Environmental Protection Agency. Phone conversation February 11, 2013.

MS4 Program Evaluation Guidance. U.S. Environmental Protection Agency Office of Wastewater Management. January 2007.

Robinson, Anthony. Ohio Environmental Protection Agency. Phone conversation February 5, 2013.

Tetra Tech, Inc. Municipal Separate Storm Sewer System (MS4) Program Audit Guidance.

Contributing Authors

This document was developed by the MS4 Specialists' Team – Anthony Fischer, Ruth King, Suzan Limberg, Maureen McBroom, and Kim McCutcheon – and edited by Bryan Hartsook, Engineer Liaison.

Approved by Runoff Management PMT on 08/04/2016.