

# Why Develop a SWMP ?

- It is expected and required by the MS4 Permit and federal regulations/regulatory authority (USEPA)
- The USEPA “Protocol” is the reference document that outlines minimum requirements/expectations for an MS4 permittee for a developed Stormwater Management Program (SWMP).
- The SWMP document is “above and beyond” the Minimum Control Measures (MCMs) that have been generally associated with an MS4 Permit. What the SWMP is supposed to do is grounded in the following:

The operator must, at a minimum, develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act. [40 CFR 122.34(a)]

## **A primary guiding factor for the borough's SWMP**

Establishes a balanced and coordinated program framework - based on regulatory requirements to work within - that allows the borough to focus resources on actual problems, issues, etc. in lieu of simply performing tasks for the sake of performing tasks that are perceived as permit compliance.

# The SWMP is organized to address the sections of the “Protocol”

- Applicability
- Limitations on Coverage
- Discharges to Water Quality Impaired Waters
- Stormwater Management Program (SWMP)
- Public Education and Outreach (MCM 1)
- Public Involvement/Participation (MCM 2)
- Illicit Discharge Detection & Elimination (MCM 3)
- Construction Site Stormwater Runoff Control (MCM 4)
- Post-Construction Stormwater Management in New Development and Redevelopment (MCM 5)
- Pollution Prevention/Good Housekeeping for Municipal Operations (MCM 6)
- Sharing Responsibility
- Reviewing and Updating SWMPs
- Monitoring
- Recordkeeping
- Reporting

# SWMP results in processes based on the “nitty-gritty” of the “Protocol”

Verify the operator has performed an annual review of the SWMP in conjunction with the annual report.

If modifications have been made to the SWMP, verify a record of written notification of proposed change including:

- An analysis of why the BMP is ineffective or infeasible
- Expectations of the effectiveness of the replacement BMP
- The analysis of why the replacement BMP is expected to achieve goals of replaced BMP

Annual evaluation and assessment processes established address the above from the “Protocol,” but do so in a manner that respects the borough’s abilities, available resources, and desired goals.