



GET THE NEWS!

Massachusetts Stormwater News is a collaborative effort of the Massachusetts Department of Environmental Protection (MassDEP) and the New England office of the U.S. Environmental Protection Agency (U.S. EPA). This newsletter will be sent via email every few months to provide information to municipalities and others related to the Massachusetts Small Municipal Separate Storm Sewer System (MS4) permit. MA Stormwater News will feature topics of interest, provide updates on upcoming permit deadlines, and highlight assistance resources from MassDEP, U.S. EPA and others.

U.S. EPA and MassDEP know that stormwater management is just one of the many challenges facing municipalities. We are committed to working with municipalities as you move forward on permit implementation.

This issue focuses on the topic of the Stormwater Management Program (SWMP) that must be prepared by permittees. We also highlight some upcoming assistance and training resources from U.S. EPA and MassDEP.

## Preparing Your Stormwater Management Program (SWMP)

The 2016 Massachusetts Municipal Separate Storm Sewer System (MS4) permit requires preparation of a written Stormwater Management Program (SWMP) by July 1, 2019 - within one (1) year of the effective date of the permit. The permit requires a written SWMP so permittees deliberately and thoughtfully develop various aspects of their stormwater program and create reference documents for standardized operating procedures (SOPs). Simply put, the SWMP is a permittee's plan for meeting permit requirements.

To help you meet the July 1, 2019 deadline, this issue of Stormwater News focuses on SWMP preparation. It includes:

- *SWMP Toolkit* that highlights resources from EPA, MassDEP and others,
- *Tips for Success in Preparing and Maintaining your SWMP*, and the
- *Massachusetts MS4 First-Year SWMP Checklist (For Permittees Authorized Under the Previous Permit)* that lists SWMP information requirements.

We encourage you to attend the upcoming EPA webinar *Preparing Your Stormwater Management Program (SWMP)* scheduled for March 21, 2019.

### SWMP Toolkit

**SWMP Webinar: Thursday, March 21, 2019, 1:30-2:30 PM EST**  
**Preparing Your Stormwater Management Program (SWMP)**

To register: <https://register.gotowebinar.com/register/434287697163405825>

#### Online Resources

**Massachusetts Stormwater Management Program, SWMP Template V 1.1**

<https://www3.epa.gov/region1/npdes/stormwater/ma/swmp-template-ma.pdf>

**New Permittee SWMP Template – Massachusetts V 1.0**

<https://www3.epa.gov/region1/npdes/stormwater/ma/new-permittees-swmp-template-ma.pdf>

**SWMP Template “How-To” (Coming Spring 2019)**

**Stormwater Tools in New England, SWMP Resources** <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#swmp>

Access customizable templates, SOPs, protocols and more.

**Massachusetts Small MS4 General Permit Website**

<https://www.epa.gov/npdes-permits/massachusetts-small-ms4-general-permit>

**As always, EPA and MassDEP staff are available to assist you.**

# What is a Stormwater Management Program, or SWMP?

A SWMP describes the activities and measures (Best Management Practices or BMPs) a permittee will implement to meet the terms and conditions of the 2016 MS4 permit. The SWMP details a permittee's overall program to address stormwater pollution.

While a complete SWMP may be a single document or a collection of documents, it is a compilation that includes SOPs, protocols, and other materials that provide details about how and when different BMPs are completed and the responsible parties or departments. The SWMP is a reference for managers, staff, contractors, and other parties responsible for implementing, documenting, and managing aspects of the permit. A complete and up-to-date SWMP helps ensure access to program information and can help promote:

- Timely response to problems and inquiries,
- Accountability for program implementation,
- Effective communication and coordination,
- Sound decision-making,
- Informed allocation of resources,
- Proactive management of assets,
- Complete and organized data management, and
- Efficient data collection for annual evaluation and reporting.

The SWMP can also help ease staffing transitions and ensure the continuity of operations by capturing institutional knowledge in advance of retirements and providing a comprehensive resource for training new employees.

The SWMP is a "living" document that is updated annually. It must be updated and/or modified as activities are modified, and changed or updated to meet permit conditions. Refer to Section 4.1 of the permit for BMP amendment provisions.

## Preparing a SWMP for the 2016 Permit

Permittees authorized under the 2003 permit must amend their existing SWMP to reflect the new permit's BMP modifications, updates, and measurable goals as set out in Section 1.10(b) of the 2016 MS4 permit. In addition, while the 2003 permit did not require the SWMP to be a written document, the 2016 MS4 permit requires that the SWMP be a written document completed by July 1, 2019. Permittees authorized by the 2003 permit must continue to implement their existing SWMP until the new SWMP has been updated. New permittees must adhere to all permit requirements, including the preparation of a SWMP by July 1, 2019.

## Using the EPA Templates

EPA has produced Massachusetts Stormwater Management Program (SWMP) Templates for MS4s authorized to discharge under the previous permit and for new permittees. These templates are tools to help permittees prepare their SWMP and assemble the required information in one place. The templates can be downloaded from EPA's Stormwater Tools in New England website (<https://www.epa.gov/npdes-permits/stormwater-tools-new-england#swmp>) and customized for your SWMP. While use of these templates is not required, they can be a helpful tool for identifying, organizing, and compiling the required information, particularly for those creating a SWMP for the first time.

The information submitted in your Notice of Intent (NOI) may be a useful resource as you update or create your SWMP. For example, the list of receiving waters submitted with your NOI can serve as the master copy you'll maintain in your SWMP as a "living document," updating it as necessary. In addition, the BMPs listed in your NOI can inform which ones you decide to include, with additional details, in your SWMP.

Cut and paste content from the NOI in to your SWMP as appropriate. For example, your NOI may have included plans in 2019 to use an educational message to target dog owners with a brochure about pet waste. In the SWMP you would provide more information about the brochure, including details of the content to be included, a schedule for creation and delivery, the person or organization responsible for creation and delivery, and details of how you plan to measure the success after delivery.

## Using the EPA Templates (cont.)

EPA encourages the use of digital and online systems to manage stormwater programs. SWMPs can be written in hard copy or electronic format and are likely to be a combination of both. For instance, electronic items such as maps, spreadsheets, inspection reports and SOPs can be referenced in the SWMP by document/file name and/or the web address URL. SOPs might include the protocols and procedures you'll use to implement Illicit Discharge Detection and Elimination (IDDE), Construction, Post-Construction, or Good Housekeeping BMPs for Minimum Control Measures (MCMs).

## Templates for Protocols and Procedures

Templates for certain protocols and SOPs are available on EPA's Stormwater Tools in New England website (<https://www.epa.gov/npdespermits/stormwater-tools-new-england#swmp>). For example, you can download the *Template Parks and Open Space SOP* or the *Template Street Sweeping SOP*.

Make sure to customize a template so that it is specific to your municipality or organization. References to SOPs can be included in your SWMP by using the document/file name or listing a web address URL. While use of these templates is not required, it is encouraged. They can help you develop your own protocols and SOPs more efficiently. Other tools, such as the EPA New England Bacterial Source Tracking Tool, found at: <https://www3.epa.gov/region1/npdes/stormwater/ma/epa-ne-bacterial-source-tracking-protocol.pdf>, are also available for use and can be referenced in your SWMP.

## Completing Your SWMP

The SWMP must be signed and certified by your principal executive officer or a ranking elected official (e.g., mayor, city manager). SWMPs can also be signed by a "duly authorized representative," as set out in Appendix B, Subsection B.11(B) of the permit.

The person authorized as the duly authorized representative to sign the SWMP and other reports associated with the permit must be a person in charge of the overall operation of the MS4. A *Template Delegation of Authority* memo that can be filled out and kept with your SWMP can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#swmp>.

The complete SWMP must be kept at the office or facility of the person listed as the program contact on the NOI and be immediately available, upon request, to representatives from EPA, MassDEP, the U.S. Fish and Wildlife Service or the National Marine Fisheries Service. It must also be available to the public during normal business hours and posted online if your municipality or organization has a website.

Public availability of the SWMP is important to allow for public participation. Posting it on your website also allows for greater availability to community members, watershed groups, and other parties interested in learning about the program. If a municipality or organization does not wish to post mapping information online for public safety reasons, it must state that fact either with or in the SWMP, and provide instructions on how interested parties can obtain the information.



## Massachusetts Statewide Education Program

[Think Blue Massachusetts](http://www.thinkbluemassachusetts.org) is a statewide educational campaign to help residents and businesses do their part to reduce polluted runoff and keep Massachusetts lakes, rivers, and streams clean and healthy. Run by the Massachusetts Statewide Municipal Stormwater Coalition, Think Blue Massachusetts offers pre-prepared materials for use by municipalities in educational programs. Learn more at [www.thinkbluemassachusetts.org](http://www.thinkbluemassachusetts.org).

## Tips for Success in Preparing and Maintaining Your SWMP

- Use an EPA template to help organize your SWMP.
- While the NOI is the skeleton of a stormwater program, indicating generally how you plan to adhere to all permit conditions, the SWMP "puts meat on the bones" with details and timeframes on BMP implementation. Use what you've already prepared for your NOI, and add to it when creating or updating your SWMP.
- Don't reinvent the wheel. Use the available protocols and customizable SOP templates that are applicable to your situation.
- Identify roles and responsibilities for individuals/departments assigned tasks under your SWMP.
- Get organized and stay organized. Create physical and/or electronic folders for ongoing management of the reports, data and other information associated with your stormwater program.
- Keep the SWMP up-to-date.

## Additional Assistance Resources from EPA and MassDEP

### Massachusetts MS4 Permit, First Year Requirements Fact Sheet

A summary table of the tasks and sections for permit requirements that must be completed by June 30, 2019.

<https://www3.epa.gov/region1/npdes/stormwater/ma/ma-ms4-checklist-1st-yr-req.pdf>

### IDDE Instructional Video **NEW**

*A Walk-Through of the Illicit Discharge Detection and Elimination (IDDE) Requirements of the 2016 Massachusetts and 2017 New Hampshire Small Municipal Separate Storm Sewer System (MS4) Permits*, on demand video

<https://www.youtube.com/watch?v=Br8ujFKAMd4&feature=youtu.be>

### Stormwater Tools in New England Website

Find the latest tools, resources, and updates on upcoming training opportunities.

<https://www.epa.gov/npdes-permits/stormwater-tools-new-england>.

### Soak Up the Rain Webinar **NEW**

*Storm Hazard Mitigation through Designing with Nature*, February 12, 2019, 1:00- 2:30 PM EST

To register: <https://register.gotowebinar.com/register/6869293849013987073>

**Soak Up the Rain Webinar Series:** <https://go.usa.gov/x5zn2>

**Soak Up the Rain Outreach Tools:** <https://go.usa.gov/x5znT>

### Public Education and Outreach Program

The MS4 Permit requires each town to implement a public education and outreach program that reaches four different audiences and that includes messages that are most relevant to that community. Town officials can click on DEP's link below to download – and save – brochures, pamphlets and other materials and use those to help comply with Section 2.3.2.c of the MS4 permit: <https://go.usa.gov/x5dgr>

For “hands on” MS4 training and assistance for your community, call MassDEP's Stormwater Coordinator Fred Civian at 617-292-5821.

### GPS Equipment Loan and On-site Training Program

EPA has a limited number of GPS units available to loan, at no cost, for stormwater system mapping. EPA will provide on-site training on the use of the GPS equipment and how to manage the data for use in GIS. For more information on the GPS program, contact Deborah Cohen at [cohen.deborah@epa.gov](mailto:cohen.deborah@epa.gov).

## Resources and Contacts

Questions or concerns can be sent to [StormwaterNewsMA@epa.gov](mailto:StormwaterNewsMA@epa.gov). Specific questions about the permit should go to:

EPA: Newt Tedder – [tedder.newton@epa.gov](mailto:tedder.newton@epa.gov) or 617-918-1038

MassDEP: Fred Civian – [frederick.civian@state.ma.us](mailto:frederick.civian@state.ma.us) or 617-292-5821

Massachusetts Stormwater News is a collaborative effort of the Massachusetts Department of Environmental Protection and the New England office of the U.S. Environmental Protection Agency. Suggestions for future topics, questions or assistance, or requests to be added or removed from the MA Stormwater News mailing list can be sent to: [StormwaterNewsMA@epa.gov](mailto:StormwaterNewsMA@epa.gov).



# Massachusetts MS4 First-Year Stormwater Management Program (SWMP) Checklist

## (For Permittees Authorized Under the Previous Permit)

The Massachusetts MS4 First-Year SWMP Checklist sets out Minimum Control Measure (MCM) elements that must be included in SWMPs by July 1, 2019 for all permittees that were covered under the previous MS4 permit. MCM incorporation deadlines for newly designated MS4s differ from MCM deadlines for MS4s authorized under the previous permit. Deadlines for newly designated permittees are set out in Section 1.10.3. Deadlines for previously authorized permittees are set out in Section 1.10.2. Use this checklist as a guide as you review and update your SWMP to address these requirements.

### SMALL MS4 AUTHORIZATION

- Date that the NOI was submitted and the location of the NOI
- Date that authorization was granted and the location of the authorization letter

### RECEIVING WATERS

- Identify all receiving waters and impairments to waterbodies
- Identify the number of outfalls that discharge to each waterbody segment

### ELIGIBILITY DETERMINATION UNDER THE ENDANGERED SPECIES ACT (Attach and reference your NOI)

- Appendix C determination under the U.S. Fish and Wildlife Endangered Species Act (ESA)
- The Criterion used to certify ESA eligibility
- Additional measures required by the U.S. Fish and Wildlife Service (if any)

### ELIGIBILITY DETERMINATION UNDER THE NATIONAL HISTORIC PRESERVATION ACT (NHPA)

- (Attach and reference your NOI)
- Appendix D property screening determination
  - The Criterion used to certify NHPA eligibility
  - Additional documents from the State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO)
  - Additional measures required by the SHPO/THPO to avoid/minimize adverse impacts (if any)

### MCM 1: PUBLIC EDUCATION AND OUTREACH

- Identify all planned BMPs
- Identify the locations of applicable materials for each BMP
- Identify the target audience(s)
- Identify the measurable goals
- Identify the dates that message(s) are sent to each target audience
- Identify the responsible parties involved in ensuring the completion of the BMP

### MCM 2: PUBLIC INVOLVEMENT AND PARTICIPATION

- The location of the SWMP for public access
- Provisions for public participation in SWMP development
- Identify any additional planned BMPs, responsible party or parties, location of the documents required to complete the BMP, and measurable goals

### MCM 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

- Reference legal authority
- Identify the department responsible for illicit connection enforcement
- Annual Sanitary Sewer Overflow (SSO) Inventory
- MS4 system map
- IDDE Program Document
- Outfall/interconnection inventory and ranking
- Employee training content and dates

### MCM 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

- Reference legal authority
- Site plan review procedures
- Procedures for site inspection and enforcement of sediment and erosion control measures

### MCM 5: POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

- Reference legal authority
- Green infrastructure report
- List of municipal retrofit opportunities
- Guidelines for street design and parking lots

### MCM 6: GOOD HOUSEKEEPING AND POLLUTION PREVENTION FOR PERMITTEE-OWNED OPERATION

- Catch basin cleaning program
- Street sweeping program
- Stormwater treatment structure inspection and maintenance procedures
- Winter road maintenance program