

Minnesota Pollution Control Agency (MPCA)
Municipal separate storm sewer system (MS4) example audit questions

MS4 Program Area - Program Management
Give a high-level overview of your stormwater program.
Which departments are involved in implementing your stormwater pollution prevention program (SWPPP)?
How many staff work in, at least partially, your stormwater program?
Can you provide an organizational chart for stormwater staff?
Are outside groups [e.g. watershed districts (WDs), watershed management organizations (WMOs), solid and water conservation districts (SWCDs), consultants] used to implement the SWPPP?
In what areas are they assisting or have authority?
Are site plan reviews coordinated with any outside groups?
How do you communicate with the outside groups?
Do you refer back to your SWPPP Document? If so, how?
How do you evaluate if you're meeting measurable goals outlined in the SWPPP document?
How is your stormwater program funded?
If you have a stormwater utility fee or other funding mechanism, what does it cover?
What is the fee rate if a stormwater utility fee is used?
If you have a stormwater utility fee or other funding mechanism, is it completely funding the program?
Are there any breaks on the fee rate offered, such as incentives for limiting discharges or impervious surfaces?
For MS4s with total maximum daily loads (TMDLs)
Have you modified any part of your SWPPP in response to a TMDL?
Do you have a waste load allocation (WLA) assigned?
What is the WLA?
What is your strategy for compliance with your WLA?
What best management practices (BMPs) will you be implementing over the course of the permit term to work towards achieving the WLA?
What has your involvement with the TMDL process been for those TMDLs under development?
Are you aware of other impaired waters that are in close proximity to your MS4 that you may have a future WLA associated with?

MS4 Program Area - MCM 1 and 2: Public Education/Involvement
Give a high-level overview of your public education program (e.g. the stormwater related outreach, partnerships you are a part of).
Describe your educational outreach implementation plan. Provide examples of educational materials used.
What are the methods and locations used to distribute educational materials?
Have you distributed specific stormwater messages? What is the focus of the messaging?
Have you distributed educational materials for illicit discharge recognition and reporting?
Have you identified target audiences (e.g. residents, specific business sectors) for stormwater education and outreach? How have target audiences been established (e.g. behavior, location/neighborhood, age, environmental justice areas)?
Are target audiences regularly reevaluated? If yes, how often?
Have you done anything to cause a behavior change in your target audiences? Explain.
Do you host stormwater related volunteer activities? Describe.
How do you notify the public of your SWPPP?

MS4 Program Area - MCM 1 and 2: Public Education/Involvement
How are you getting annual input from the public on your SWPPP?
What are your municipality's policies regarding public notice? Are your SWPPP annual meeting notices published within the appropriate timeframe and in required locations (e.g. newspaper, online) before the public meeting?
What do you cover during the SWPPP annual meeting?
When you receive a comment on your SWPPP, what is your process for considering and responding to the comment?
Are you doing an annual review of your educational implementation plan? If so, what does that look like?
Have any public awareness surveys been performed?
Describe the most effective educational materials used.

MS4 Program Area – MCM 3 Illicit Discharge Detection and Elimination
Does your storm sewer system map include receiving waters, structural stormwater BMPs, pipes/conveyances and flow direction, and outfalls?
Does the map include private stormwater facilities and BMPs?
Who uses the map (e.g. firefighters, police, maintenance staff) and how is it used?
Describe your illicit discharge detection and elimination program.
Do you incorporate illicit discharge detection into all inspection and maintenance activities? Explain how.
Is dry weather screening used?
Are certain areas prioritized for illicit discharge inspections? How and why?
Are checklist or a reporting form used?
Do you do any sampling or analysis of materials?
Have you used any of your enforcement tools to address illicit discharges?
What staff have the authority to enforce the ordinance?
Do you televise storm sewers? If not, it could be a good way to identify illicit connections.
How are you documenting illicit discharge/connection complaints?
Do you have procedures for investigating, locating, and eliminating illicit discharges?
Do you have a spill response plan or procedures? If so, describe.
Describe how you would respond to a sewer spill and your clean-up methods.
How are staff trained to recognize and report illicit discharges?
Are seasonal & part-time staff trained to recognize and report illicit discharges?
How often are staff trained in illicit discharge recognition and reporting?
Does the training cover the language in the illicit discharge regulatory mechanism (i.e. exceptions, prohibited)?
Describe how you are documenting your municipality's Illicit Discharge Detection and Elimination Program activities: <ul style="list-style-type: none"> • inspections, • reporting from public, • dates of discovery, • locations of illicit discharges, • sources, and • actions taken to correct violations).

MS4 Program Area – MCM 4: Construction Site Stormwater Runoff Control
Describe active (or upcoming) construction projects in your municipality, specifically projects that disturb an acre or more of land.
How many currently active sites are in your MS4's jurisdiction?
Describe development in the city - is the city fully developed or are there areas remaining for development?
Describe the construction site stormwater runoff control regulatory mechanism.

MS4 Program Area – MCM 4: Construction Site Stormwater Runoff Control
How is your construction site stormwater runoff control regulatory mechanism at least as stringent as the MPCA NPDES/SDS CSW General Permit?
Provide an overview of your site plan review procedure.
Who performs construction site stormwater runoff control plan reviews for the MS4?
What training do they receive and what is the frequency?
Are applicants informed to apply for the NPDES/SDS Construction Stormwater Permit?
What is the size threshold for plan reviews?
Are plan review criteria or a checklists used during site plan reviews?
Describe what you document/track for site plan reviews for construction activity (e.g. name, location, acreage of disturbance, owner/operator, other info for plan approval or denial).
Do you conduct a site plan review in conjunction with a watershed district or watershed management organization? If so, how is review coordinated?
How are stormwater pollution prevention plans for municipal construction projects developed?
Are they designed in-house or contracted?
Are designers trained in stormwater pollution prevention plan design?
Is a checklist used during the design and/or review of the public construction projects?
Have you developed a method to receive construction stormwater complaints that are submitted by the public?
Explain your inspection program and process at construction sites.
Who does the inspections?
What kind of training have they received and how often?
Are standard inspection checklists used?
Are there any differences in inspection between private and municipal projects?
Do different people inspect different projects?
How often are sites inspected?
Are inspections triggered by rain events?
What size rain event and how long after the rain event is an inspection required?
Are sites prioritized to determine inspection frequency (proximity to water bodies, impaired waters, size of project, slopes on project, other)?
Do you track construction projects and their status?
Do you use the MPCA Construction Stormwater Permit Search Tool?
What enforcement mechanisms are available (e.g. notices of violation, fines, Stop-work order, civil penalties, criminal penalties)?
Have you had to use any of your enforcement tools on violations observed at construction sites?
How are you documenting the enforcement actions?
Are you documenting verbal warnings?
Can construction inspectors administer enforcement actions? What types?
Who does the follow-up concerning enforcement actions?
What is the enforcement action most commonly used?
How many enforcement actions taken in the previous year? Which types?
What is the most common compliance issue identified at construction sites?

MS4 Program Area – MCM 5 Post-Construction Stormwater Management
How are the soils in your city/what soil types do you have?
Does your municipality have an overall comprehensive or watershed plan with detailed information on current and planned development and redevelopment or other strategies that discuss stormwater management?
Does the comprehensive plan include stormwater elements (e.g. open space, waterbody protection)?
Are there programs and design guidelines to assist in current and future development and redevelopment?
What performance standard (e.g. 95% storm event, 2 yr/24 hour storm event, retain first inch of runoff from new impervious, MIDS, other) do you have in your regulatory mechanism to meet requirements of no net increase of total suspended solids (TSS), total phosphorus (TP), and volume for new development and a net decrease in TSS, TP, and volume for redevelopment projects?
Are the pre- and post- construction site plan reviews done at the same?
If no, who performs the post-construction stormwater management plan reviews?
What is the training they received and the frequency?
Is there a size threshold for plan review?
Do you use a checklist when conducting post-construction plan reviews?
Describe the tool/mechanism used to ensure long-term maintenance of permanent stormwater BMPs. Is it effective and how may it be improved?
Is a maintenance agreement required?
Are there challenges with requiring long-term maintenance of private stormwater BMPs? Explain.
When do you execute the maintenance agreement?
Have you had to rely on the language in the agreement to maintain a private post-construction BMP if the private party wasn't maintaining it?
How do you track private post-construction BMPs?
What information is tracked (location, maintenance requirements, inspection findings, other)?

MS4 Program Area – MCM 6 Municipal Operations
What BMPs are in place at each of the facilities in the facility inventory to protect stormwater?
How many structural stormwater BMPs do you have and what are they?
Describe your stormwater sewer system inspection and maintenance for structural stormwater BMPs.
Have you established a schedule for inspections and cleaning of structural stormwater BMPs?
Do inspectors use a checklist when conducting structural stormwater BMP inspections?
Do you evaluate previous inspection findings to target future maintenance activities and allocate resources?
Do you inspect private stormwater facilities?
Describe your inspection procedures for outfalls.
Explain how you document/track structural integrity, proper function and maintenance needs.
Describe your inspection and maintenance procedures for ponds.
Have you developed procedures and a schedule for determining TSS and TP treatment effectiveness of your stormwater ponds?
Provide overview of street sweeping policies and procedures.
What is the frequency of street sweeping?
Is the frequency based on water quality factors?
What are the type(s) of street sweeping equipment used?
Are street sweeping records kept/used?
How are street sweeping wastes managed?

MS4 Program Area – MCM 6 Municipal Operations
Is sweeping contracted or done in-house?
Describe the procedures/policies and frequency for sweeping parking lots owned or operated by the MS4.
Provide overview of sand/salt applications.
Are BMPs in place to minimize water quality impacts of sand/salt?
What deicers are used by the MS4?
Are the quantities of sand/salt used tracked?
Are sand/salt swept up after application? How soon?
Do you conduct staff training related to sand/salt applications?
Have you, or do you, evaluate the extent of inflow into the storm sewer system?
Describe procedures for municipal usage of pesticides, herbicides and fertilizer.
Are certified applicators used?
What are the storage locations and procedures used for pesticides, herbicides and fertilizers?
What BMPs are used during application?
Are contractors used for applications? Are they trained/certified in best practices?
Do you have a written plan concerning fertilizer/pesticide use?
Do you have general contract language that includes consideration of stormwater impacts and using appropriate BMPs?
What are the procedures and frequency for staff training?
What materials are used?
What topics are covered?
What is the frequency of training?