

Chapter 9

Monitoring, Record Keeping and Reporting

A. MS4 Permit Requirements

Several sections of the general MS4 permit contain requirements pertaining to permittee record keeping and reporting. These requirements are listed below.

4.1.1.3 requires the permittee to identify the person(s) primarily responsible for the stormwater management program.

4.1.1.4 requires the permittee to inspect any structures that function to prevent pollution of storm water or to remove pollutants from storm water and of the permittee's area of jurisdiction in general to ensure that any BMPs are continually implemented and effective.

4.4.1 requires the permittee to do an annual review of the permittee's storm water management program in conjunction with preparation of the annual report required under section 5.3. The permittee may update the program subject to the following procedures as specified in the permit:

4.4.2.1 Changes adding components, controls or replacement to the SWMP may be made at any time upon written notification to the Department; or through the MS4 SWMP Report if changes are minor or through a timely resubmittal of the SWMP if major changes are needed;

5.1.1 The permittee shall retain records of any monitoring information used to complete the application of this operating permit, implementation of any part of this operating permit and implementation for any part of the permittee's SWMP for a period of at least three (3) years from the date of the sample, measurement, or analysis. This period may be extended by official request by the department at any time. Monitoring data shall include, if applicable the below information;

5.1.1.1 All calibrations and maintenance records;

5.1.1.2 All original strip chart recordings for continuous monitoring instrumentation;

5.1.1.3 The date, location and time of sampling or measurement;

5.1.1.4 The individual(s) who performed the sampling or measurements;

5.1.1.5 The date(s) analysis were performed;

5.1.1.6 *The individual(s) who performed the analysis;*

5.1.1.7 *The analytical techniques or methods used; and*

5.1.1.8 *The results of such analysis*

5.1.2 *Any monitoring conducted for the purpose of implementation of any part of this permit shall be conducted in accordance to test procedures approved 40 CFR part 136 unless another method is required under 40 CFR subchapters N or O.*

B. Record Keeping

5.2.1 *The permittee shall retain records of all activities requiring recordkeeping by the SWMP, a copy of the NPDES permit, a copy of all ordinances, polices, and formal procedures for all six (6) MCMs and records of all data used to complete the application for this permit, for a period of at least thirty (30) years from the date of the report or application. This period may be extended by official request at any time.*

The City will be responsible for ensuring that:

- All elements of this SWMP are effectively implemented;
- Required inspections are made;
- Required records are kept; and
- Information required for inclusion in reports to MDNR is provided to the coordinating authority upon request or as scheduled.

The permit specifies certain actions, such as inspections, which each permittee must perform. In addition, this SWMP identifies actions that the permittees are committed to take in order to comply with the requirements of the Phase II Storm Water Regulations and the terms and conditions of the MS4 permit. Measurable goals and time frames for achieving those goals have been established. Accurate and timely record keeping by the permittee is essential in order to document the timeliness and effectiveness of committed actions, to demonstrate compliance with the permit requirements and to provide the basis for the annual reports. The permittee must maintain documentation regarding the implementation of programs and the maintenance of the programs under the MS4 permit.

Following are examples of the types of actions for which records should be kept. This listing is not all inclusive:

- Inspections as required by the permit (Record dates, areas inspected, personnel involved, findings, follow-up actions, etc.). The permittee must conduct inspections within its area of jurisdiction for the activities for which it is responsible under this SWMP.
- Annual program evaluations as required by the permit (Record evaluation method and results. If changes are proposed in the SWMP, record the reasoning behind the changes).
- Public information efforts under MCM 1 (Record dates, activity such as brochure distribution, speaking event, etc.; type and number of people reached, milestones in web site development, web site hits; etc.).
- Public involvement efforts under MCM 2 (Record milestones in public involvement activity dates, nature of activities; applicable statistics such as numbers of volunteers, numbers of people reached, quantities of waste collected or removed, miles of stream or road cleaned, number of inlets marked; etc.).
- Illicit discharge detection and elimination efforts under MCM 3 (Record statistics such as number of illicit discharge investigations initiated, number of stream problems identified; results of investigations and problem identification; etc.)
- Construction site stormwater control efforts under MCM 4 (Record SWPPPs completed, program modifications/adoptions; statistics such as the number of permits issued; etc.).
- Post-construction stormwater management in new development and redevelopment efforts under MCM 5 (Record milestones in review and modification of existing regulations, and City approval of BMPs; examine the need for the Stormwater Quality Permit Fee; etc.).

- Pollution prevention/good housekeeping for municipal operations efforts under MCM 6 (Record milestones in review and modification of existing ordinances, development and adoption of a model O&M program, development of a training program, dates, locations and subject matter of training sessions; statistics such as numbers of training sessions held, numbers of employees trained/refreshed; etc.)