



Missouri Department of Natural Resources  
Water Protection Program

**Phase II MS4 Stormwater Management Plan Evaluation Form**

The purpose of a Stormwater Management Plan (SWMP) Evaluation Form is to assist the Department of Natural Resources (Department) in determining if the regulated MS4's SWMP as part of MO-R04 (2-Step) permits is meeting the Maximum Extent Practicable (MEP) for the individual MS4 and includes the necessary Clear, Specific, and Measurable details to appropriately meet the requirements of the permit which are consistent with the Federal Remand Rule requirements and the requirements of the Permitting Authority. Once approved by the Department, the SWMP will become enforceable as part of the regulated MS4's National Pollution Discharge Elimination System operating permit issued by the Department.

In the following evaluation, each permit requirement is evaluated in the permittee's SWMP submitted to the Department as part of the MS4 permit renewal process. The corresponding narrative and supplemental documentation for each permit requirement within the permittee's SWMP is given a sufficiency determination of either "**No Action Needed**", "**Recommendation**", or "**Action Required**". Upon completion of the Department's review, the permittee's SWMP is ultimately approved or deemed insufficient resulting in an incomplete MO-R04 permit renewal application (*see* 2.2.E in permit).

Below, any permit requirement or permit condition marked "Action Required" means modifications or additional details are necessary to achieve an approvable SWMP. Any permit requirement/condition marked "Recommendation" means the details in the permittee's SWMP meet the minimum requirements, but may benefit from additional or modified/additional details. Any permit requirement/condition marked "No Action Needed" means the details in the permittee's SWMP meet the minimum requirements and no additional actions are needed to achieve approval for that permit requirement/condition. Please review the evaluation form for additional detail to address any action(s) required.

**MS4 Name: St. Charles County**

**Permit ID: MO-R040058**

**County: St. Charles**

**Region: SLRO**

**Effective Date of Permit: 2021 Permit Renewal Application Review**

**Date SWMP or Revised SWMP was received: 3/31/21**

**Date of Review: 8/27/21**

**MDNR Staff Conducting Review: Erin Heidolph**

**PLAN OVERVIEW**

**Comments:** *Based upon review of this SWMP, it appears the permittee has a strong understanding of their MS4 and the permit requirements.*

New MS4: YES  NO  CO-PERMITTED MS4: YES  NO

If co-permitted, does the SWMP describe the co-permittee relationship? YES  NO  NA

If co-permitted, does the SWMP describe who the coordinating authority is? YES  NO  NA

**4.0** – Does the SWMP contain the six (6) Minimum Control Measures (MCMs): YES  NO

**No Action Needed**  : **Recommendations**  : **Action Required**  :

**Comments:**

**3.1.B** – Does the SWMP list the person primarily responsible for the Stormwater Management Program or each of the MCMs? (*Helpful guidance: Listing an office/title/position is not appropriate. Must list name(s), title(s), and email/phone contact information.*) YES  NO

**No Action Needed**  : **Recommendations**  : **Action Required**  :

**Comments:**

**3.3** – Does the SWMP describe the permittee’s iterative process for each MCM? The description needs to include how **each** BMP/MCM is evaluated and subject to replacement or modification: YES  NO

**No Action Needed**  : **Recommendations**  : **Action Required**  :

**Comments:**

**3.1.A** – If the regulated MS4 is new, does the SWMP, MCMs, or BMPs establish that the permittee will have the MCMs fully implemented by the end of their permit term or five years (whichever is later)?

YES  NO  NA

**No Action Needed**  : **Recommendations**  : **Action Required**  :

**Comments:**

**3.1.E** – BMPs and methods prescribed in the regulated MS4’s permit may be substituted with alternative BMPs. Does the permittee utilize alternative BMPs? YES  NO

If alternative BMPs are utilized:

- Are the substitutions as reasonably protective as the BMPs replaced? (*Documentation will be required for this claim*) YES  NO  NA
- Are the substitutions and/or methods identified in the SWMP along with a rationale for the substitutions? (*Rationale can be the same as the documentation*)

YES  NO  NA

**No Action Needed  :**

**Recommendations  :**

**Action Required  :**

**Comments:**

**6.1 – Is the MS4 impacted by a TMDL:** YES  NO

Does the SWMP contain an Assumptions and Requirement Attainment Plan (ARAP):

YES  NO  NA

If no, does the SWMP include details on the TMDL and indicate when and how the ARAP will be submitted: YES  NO  NA

**No Action Needed  :**

**Recommendations  :**

**Action Required  :**

**Comments:**

**MCM #1 - PUBLIC EDUCATION AND OUTREACH:**

The permit requires the regulated MS4 to implement (for new MS4s this includes the development) a public education program to distribute educational material to the community and/or conduct equivalent outreach activities about the impact of stormwater discharges on water bodies and steps the public can take to reduce pollutants in stormwater runoff. As part of the Stormwater Management Program as a whole, the permittee shall include all BMPs in their SWMP, which include the BMPs listed in the permit, or the agreed upon alternative BMPs, at a minimum. The BMPs are as follows:

**MCM #1 – 4.1.A** Permit requirement – Identify target audiences and explain why the target audiences are likely to have significant stormwater pollution impacts in the SWMP.

**Does the SWMP identify the permittee’s target audiences?** YES  NO

**Is the list of the permittee’s target audiences sufficient?** YES  NO

**Does the SWMP sufficiently explain why the permittee’s target audiences are likely to have significant stormwater pollution impacts?** YES  NO

*(Helpful guidance: The SWMP should describe the consideration of entities that have real potential to cause or contribute to negative impacts to water quality, or entities who have Pollutants of Concern (POCs) listed in a TMDL that affect the permittee with applicable waste load allocations (WLAs), or other pollutants that are typical in urban stormwater runoff. Additionally, significant stormwater impacts can include entities that have the ability to improve or otherwise have a positive outcome on water quality.)*

**No Action Needed**  :                      **Recommendations** :                      **Action Required**  :

**Comments:**



**MCM #1 – 4.1.B** Permit requirement – Identify target pollutants and/or sources of pollution that the permittee’s education program is designed to address and how the pollutants/sources relate to the specific target audience(s).

**Does the SWMP identify target pollutants and/or sources of pollution?** YES  NO

**Is the list of the permittee’s target pollutants and/or sources sufficient?** YES  NO

**Does the SWMP sufficiently identify how the pollutants and/or sources relate to each target audience?** YES  NO

**No Action Needed**  :                      **Recommendations** :                      **Action Required** :

**Comments:**



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**MCM #1 – 4.1.C Permit requirement –** Develop or utilize appropriate educational BMPs (materials, events, activities, etc.) to be used in conjunction with the target pollutants and target audiences. Explain opportunities about the BMPs and how the BMPs inform and educate target audiences to reduce pollutants in stormwater runoff.

**Does the SWMP include and describe educational BMPs?** YES  NO

**Are the permittee’s educational BMPs sufficient?** YES  NO

**Does the SWMP sufficiently explain opportunities for the public to become involved in the BMPs (i.e. cleanup events, public activities/events, educational events, etc.)?** YES  NO

**Does the SWMP sufficiently explain how the BMPs inform and educate target audiences?**  
YES  NO

**No Action Needed**  :                      **Recommendations** :                      **Action Required** :

**Comments:**

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**MCM #1 – Does the SWMP describe the permittee’s staff training program specific to this MCM’s BMPs?** (*Helpful guidance: Optional for MCM #1 or MCM #2. The specific requirement for training is in MCM #6 under 4.6.A; however, because 4.6.A requires the explanation of how the permittee’s training program coordinates with all other MCMs, each MCM in this form will include a training evaluation placeholder specific to the MCM.*)

YES  NO  NA

**No Action Needed**  :                      **Recommendations** :                      **Action Required** :

**Comments:**

*N/A - No training program is required for MCM’s 1 and 2.*

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**MCM #1 – Measurable Goals/Evaluations**

Section 3.1.B of the MS4 2-step general permit (MO-R04) establishes that measurable goals shall contain a clear, well-defined, and detailed description of the BMP. The goal/expected result of each BMP, explaining in specific terms the objective or results of this BMP if it is successful and the pollutant(s) reduced. Clearly explained measurable goals which shall be established for each BMP or in conjunction with multiple BMPs. These goals shall be used to measure effectiveness over time. These measurable goals may serve as BMP design objectives or goals that quantify the progress of implementation of the actions or performance of the permittee’s BMPs. Measurable goals should

describe specific actions taken by the permittee to implement each BMP. Each measurable goal shall contain a statement clearly indicating how it will be established to determine the appropriateness of identified BMPs and progress toward the expected results of the BMP. Measurable goals shall be quantifiable when feasible; however, if it is not feasible to utilize a measurable goal that is quantifiable, then the permittee shall provide justification indicating why the measurable goal cannot be quantifiable. If applicable, measurable goals shall also include frequency and the dates for such actions, or utilize interim and completion milestone dates, and a periodic frequency of measurement to document progress. It is recommended that interim and final milestone dates are established with a format of month and year. If the format of month and year cannot be utilized, the permittee shall ensure that schedules have the minimum format of 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> year of the operating permit. If not applicable, please note that in the SWMP. Clearly explain the method of documentation used for activities performed. Incorporate measurable elements to assess the outcomes of each BMP, include an annual (or more frequent) measurement to document progress, and a summary of that measurement. Measurable goals may be quantifiable, or when necessary, narrative, visual, or qualitative.

**Does the SWMP establish measurable goals for each BMP or for the MCM as a whole?**

BMP  MCM

**Does the SWMP establish how each BMP/MCM is evaluated?** YES  NO

**Does the evaluation determine if each BMP/MCM is effective?** YES  NO

**Are the measurable goals quantifiable?** YES  NO

**If no, does the permittee provide justification in the SWMP for using measurable goals that are not quantifiable?** YES  NO  NA

**Does the permittee utilize tracking for measurable goals?** YES  NO

**If so, does the permittee provide justification in the SWMP for tracking measurable goals?**  
YES  NO  NA

**Do the measurable goals contain sufficient clear, specific, and measurable detail?**

YES  NO

**At what frequency are BMPs/MCMs evaluated?** Annually  By Permit Cycle  Other

**No Action Needed**  :

**Recommendations**  :

**Action Required**  :

**Comments:**

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**MCM #2 - PUBLIC INVOLVEMENT AND PARTICIPATION:**

The permit requires the regulated MS4 to implement (for new MS4s, this includes the development) a public involvement/participation program that reaches out and engages the public in the development and implementation of the permittee’s Stormwater Management Program. As part of the Stormwater Management Program as a whole, the permittee shall include all BMPs in their SWMP, which include the BMPs listed in the permit, or the agreed upon alternative BMPs, at a minimum. The BMPs are as follows:

**MCM #2 – 4.2.A** Permit requirement – The permittee shall hold a public notice period for a minimum of thirty (30) days on the draft SWMP. The permittee shall respond to public comments received during the public notice period. The permittee shall retain copies of any public comments and responses, for a minimum of three years.

**Does the SWMP provide documentation that a public notice period was held?** YES  NO

*(Note: If no, the remaining questions under 4.2.A are Not Applicable and the permittee’s permit renewal application is considered incomplete under 2.2.E of the permit.)*

**Was the public notice period held for a minimum of 30 days?** YES  NO  NA

**Does the SWMP provide documentation that the permittee responded to public comments received during the public notice period?** YES  NO  NA

**Does the permittee retain copies of any public comments and responses for a minimum of 3 years?** YES  NO  NA *(Note: Proof of this requirement does not specifically need to be included in the SWMP. This requirement will be checked during audits of the MS4 Program.)*

**No Action Needed**  :                      **Recommendations** :                      **Action Required**  :

**Comments:**



**MCM #2 – 4.2.B** Permit requirement – The permittee shall hold a public hearing regarding the proposed Stormwater Management Program and Plan within the MS4 service area. Public notice of the public hearing shall be given at least thirty (30) days before the hearing. Public notice of the hearing may be given at the same time as public notice of the draft SWMP and the two notices may be combined.

**Does the SWMP provide documentation that a public hearing was held?** YES  NO

*(Note: If no, the remaining questions under 4.2.B are Not Applicable and the permittee’s permit renewal application is considered incomplete under 2.2.E of the permit.)*

Was the public hearing held within the MS4 service area? YES  NO  NA

Was public notice of the public hearing given at least 30 days prior to the hearing?

YES  NO  NA

No Action Needed  : Recommendations : Action Required  :

Comments:



MCM #2 – 4.2.C Permit requirement – The permittee shall have a publicly available method to accept public inquiries or concerns, and to take information provided by the public about stormwater and stormwater related topics. This method, or a combination of methods, shall cover all MCMs.

Does the permittee have a publicly available method to accept public inquiries/concerns?

YES  NO

If yes, does the SWMP sufficiently describe how the permittee’s publicly available method to accept public inquiries/concerns cover all MCMs? YES  NO

No Action Needed  : Recommendations : Action Required  :

Comments:



MCM #2 – 4.2.D Permit requirement – If the permittee utilizes a stormwater management panel or committee, MCM #2 must provide opportunities for citizen representatives on the stormwater management panel/committee.

Does the permittee utilize a stormwater management panel/committee? YES  NO

If yes, does the permittee provide opportunity for citizen representatives on the panel/committee? YES  NO  NA

No Action Needed  : Recommendations : Action Required  :

Comments:



MCM #2 – Does the SWMP describe the permittee’s staff training program specific to this MCM’s BMPs? (Helpful guidance: Optional for MCM #1 or MCM #2. The specific requirement for training is in MCM #6 under 4.6.A; however, because 4.6.A requires the explanation of how the



*permittee's training program coordinates with all other MCMs, each MCM in this form will include a training evaluation placeholder specific to the MCM.)* YES  NO  NA

**No Action Needed**  :

**Recommendations** :

**Action Required** :

**Comments:**

*N/A – No training program is required for MCM's 1 and 2.*

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**MCM #2 – Measurable Goals/Evaluations**

Section 3.1.B of the MS4 2-step general permit (MO-R04) establishes that measurable goals shall contain a clear, well-defined, and detailed description of the BMP. The goal/expected result of each BMP, explaining in specific terms the objective or results of this BMP if it is successful and the pollutant(s) reduced. Clearly explained measurable goals which shall be established for each BMP or in conjunction with multiple BMPs. These goals shall be used to measure effectiveness over time. These measurable goals may serve as BMP design objectives or goals that quantify the progress of implementation of the actions or performance of the permittee's BMPs. Measurable goals should describe specific actions taken by the permittee to implement each BMP. Each measurable goal shall contain a statement clearly indicating how it will be established to determine the appropriateness of identified BMPs and progress toward the expected results of the BMP. Measurable goals shall be quantifiable when feasible; however, if it is not feasible to utilize a measurable goal that is quantifiable, then the permittee shall provide justification indicating why the measurable goal cannot be quantifiable. If applicable, measurable goals shall also include frequency and the dates for such actions, or utilize interim and completion milestone dates, and a periodic frequency of measurement to document progress. It is recommended that interim and final milestone dates are established with a format of month and year. If the format of month and year cannot be utilized, the permittee shall ensure that schedules have the minimum format of 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> year of the operating permit. If not applicable, please note that in the SWMP. Clearly explain the method of documentation used for activities performed. Incorporate measurable elements to assess the outcomes of each BMP, include an annual (or more frequent) measurement to document progress, and a summary of that measurement. Measurable goals may be quantifiable, or when necessary, narrative, visual, or qualitative.

**Does the SWMP establish measurable goals for each BMP or for the MCM as a whole?**

BMP  MCM

**Does the SWMP establish how each BMP/MCM is evaluated?** YES  NO

**Does the evaluation determine if each BMP/MCM is effective?** YES  NO

**Are the measurable goals quantifiable?** YES  NO

**If no, does the permittee provide justification in the SWMP for using measurable goals that are not quantifiable?** YES  NO  NA

**Does the permittee utilize tracking for measurable goals?** YES  NO

**If so, does the permittee provide justification in the SWMP for tracking measurable goals?**  
YES  NO  NA

**Do the measurable goals contain sufficient clear, specific, and measurable detail?**

YES  NO

**At what frequency are BMPs/MCMs evaluated?** Annually  By Permit Cycle  Other

**No Action Needed**  :

**Recommendations**  :

**Action Required**  :

**Comments:**

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**MCM #3 - ILLICIT DISCHARGE DETECTION AND ELIMINATION:**

The permit requires the regulated MS4 to implement and enforce (for new MS4s, this includes the development) a program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200 and 40 CFR 122.26(b)(2)) into the permittee’s MS4. As part of the Stormwater Management Program as a whole, the permittee shall include all BMPs in their SWMP, which include the BMPs listed in the permit, or the agreed upon alternative BMPs, as a minimum. The BMPs are as follows:

**MCM #3 – 4.3.A** Permit requirement – The permittee shall develop, and maintain an up to date storm sewer system map, show the location of all outfalls, the names and location of all waters of the state that receive discharges from those outfalls, and the boundary of the regulated MS4 area.

1. A description of the sources of information or procedures used for the map(s), how the permittee plans to verify the outfall locations with field surveys, and how the map will be regularly updated shall be included in the SWMP.
2. The permittee shall make the map and any accompanying necessary information available to the Department upon request.

**Does the SWMP confirm that a stormwater sewer map is completed and available upon request?** *(Helpful guidance: The SWMP is not required to contain the permittee’s outfall map. The SWMP must, however, confirm the completion and availability of the outfall map. The map will be observed during audits of the MS4 for correctness and completeness.)* YES  NO

**Does the SWMP describe the source of information used for the map(s) and how the permittee plans to verify the outfall locations with field surveys?** YES  NO

**If the map is completed, does the SWMP describe how the map was developed and how it will be regularly updated?** YES  NO  NA

**No Action Needed**  :                      **Recommendations** :                      **Action Required**  :

**Comments:**



**MCM #3 – 4.3.B** Permit requirement – To the extent allowable under state, or local law, through ordinance(s), or other regulatory mechanism(s), the permittee shall effectively prohibit, unauthorized non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions. Identify in the SWMP the regulatory mechanism(s) the permittee will use to effectively prohibit illicit discharges into the MS4 by including a link to or a copy of the relevant sections.

**Does the permittee’s SWMP provide relevant sections, or a weblink to the relevant sections, of the ordinance or other mechanism used to effectively prohibit illicit discharges into their MS4?**  
YES  NO  NA

**If the permittee does not have an ordinance or other mechanism that prohibits illicit discharges, does the SWMP describe the permittee’s plan and implementation schedule for when an ordinance or other mechanism to prohibit illicit discharges will be established and implemented?** (Note: All MS4s past their first full permit cycle should have an ordinance, or similar, in place. Established MS4s beyond their first full permit cycle who do not have an ordinance, or similar, in place are considered to have a non-compliant Stormwater Program and unapprovable SWMP.) YES  NO  NA

**No Action Needed  : Recommendations : Action Required :**

**Comments:**



**MCM #3 – 4.3.C** Permit requirement – Develop and implement a plan to detect and address unauthorized non-storm water discharges, including illegal dumping, to the system. An explanation of these strategies shall be included in the SWMP with:

1. Applicable response timelines;
2. Procedures for tracing the source of an illicit discharge, including specific techniques used to detect the location of the source;
3. Procedures for removing the illicit discharge; and
4. Other practices that are a part of this plan.

**Does the SWMP contain or describe the permittee’s plan to detect and address non-stormwater discharges, including illegal dumping, to their MS4?** YES  NO

**Does the permittee’s plan contain sufficient clear and specific detail?** YES  NO

**Does the SWMP contain or describe the permittee’s response timelines and procedures for tracing the source of an illicit discharge and removing the illicit discharge?** YES  NO

**Do the permittee’s procedures contain sufficient clear and specific detail?** YES  NO

**No Action Needed  : Recommendations : Action Required  :**

**Comments:**



**MCM #3 – 4.3.D** Permit requirement – The permittee shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and the improper disposal of waste. The SWMP shall include a description of how this plan will coordinate with all other minimum control measures, monitoring, Integrated Planning (where applicable), and TMDL implementation (where applicable).

**Does the SWMP contain or describe the permittee’s plan how the permittee informs public employees, businesses, and the general public of hazards associated with illegal discharges and the improper disposal of waste? YES  NO**

**Does the permittee’s plan contain sufficient clear and specific detail? YES  NO**

**Does the SWMP sufficiently describe how the plan coordinates with all other MCMs, monitoring, Integrated Planning (where applicable), and TMDL implementation (where applicable)? YES  NO**

**No Action Needed  : Recommendations : Action Required  :**

**Comments:**



**MCM #3 – 4.3.E** Permit requirement – Implement a dry weather field screening strategy for unauthorized non-stormwater flows. The SWMP shall include a description of diagnostic monitoring procedures, including procedures for visual screening, sampling, or field analyzation and what parameters are sampled for to be used as indicators of discharge sources.

**Does the SWMP contain or describe the permittee’s dry weather field screening strategy for unauthorized non-stormwater flows? YES  NO**

**Does the permittee’s strategy contain sufficient clear and specific detail? YES  NO**

**Does the SWMP also sufficiently describe the permittee’s diagnostic monitoring procedures, including procedures for visual screening, sampling, or field analyzation and what parameters are sampled for to be used as indicators of discharge sources? YES  NO**

**No Action Needed  : Recommendations : Action Required :**

**Comments:**



**MCM #3 – 4.3.F** Permit requirement – Maintain and describe procedures to identify priority areas likely to have illicit discharges such as, but not limited to, any area where there is ongoing evidence of illicit discharges, or dumping; areas with higher likelihood of illicit connections such as neighborhoods with onsite sewage; or regions with a high percentage of directly connected impervious areas.

**Does the SWMP contain or describe the permittee’s procedures for identifying priority areas likely to have illicit discharges? YES  NO**

Does the permittee’s plan contain sufficient clear and specific detail? YES  NO

No Action Needed  : Recommendations : Action Required :

Comments:



MCM #3 – 4.3.G Permit requirement – Provide procedures to ensure the permittee’s illicit discharge ordinance (or other regulatory mechanism) is implemented by means of appropriate enforcement procedures, including fines, and actions. A description of these enforcement procedures shall be included in the SWMP.

Does the SWMP contain or describe the permittee’s enforcement procedure(s) to ensure the permittee’s illicit discharge ordinance (or other regulatory mechanism) is implemented?

YES  NO

Does the permittee’s enforcement procedure(s) contain sufficient clear and specific detail?

YES  NO

No Action Needed  : Recommendations : Action Required :

Comments:



MCM #3 – Does the SWMP sufficiently describe the permittee’s staff training program specific to this MCM’s BMPs? (Helpful guidance: The specific requirement for training is in MCM #6 under 4.6.A; however, because 4.6.A requires the explanation of how the permittee’s training program coordinates with all other MCMs, each MCM in this form will include a training evaluation placeholder specific to the MCM .)

YES  NO

No Action Needed  : Recommendations : Action Required  :

Comments:



**MCM #3 – Measurable Goals/Evaluations**

Section 3.1.B of the MS4 2-step general permit (MO-R04) establishes that measurable goals shall contain a clear, well-defined, and detailed description of the BMP. The goal/expected result of each BMP, explaining in specific terms the objective or results of this BMP if it is successful and the pollutant(s) reduced. Clearly explained measurable goals which shall be established for each BMP or in conjunction with multiple BMPs. These goals shall be used to measure effectiveness over time.

These measurable goals may serve as BMP design objectives or goals that quantify the progress of implementation of the actions or performance of the permittee's BMPs. Measurable goals should describe specific actions taken by the permittee to implement each BMP. Each measurable goal shall contain a statement clearly indicating how it will be established to determine the appropriateness of identified BMPs and progress toward the expected results of the BMP. Measurable goals shall be quantifiable when feasible; however, if it is not feasible to utilize a measurable goal that is quantifiable, then the permittee shall provide justification indicating why the measurable goal cannot be quantifiable. If applicable, measurable goals shall also include frequency and the dates for such actions, or utilize interim and completion milestone dates, and a periodic frequency of measurement to document progress. It is recommended that interim and final milestone dates are established with a format of month and year. If the format of month and year cannot be utilized, the permittee shall ensure that schedules have the minimum format of 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> year of the operating permit. If not applicable, please note that in the SWMP. Clearly explain the method of documentation used for activities performed. Incorporate measurable elements to assess the outcomes of each BMP, include an annual (or more frequent) measurement to document progress, and a summary of that measurement. Measurable goals may be quantifiable, or when necessary, narrative, visual, or qualitative.

**Does the SWMP establish measurable goals for each BMP or for the MCM as a whole?**

BMP  MCM

**Does the SWMP establish how each BMP/MCM is evaluated?** YES  NO

**Does the evaluation determine if each BMP/MCM is effective?** YES  NO

**Are the measurable goals quantifiable?** YES  NO

**If no, does the permittee provide justification in the SWMP for using measurable goals that are not quantifiable?** YES  NO  NA

**Does the permittee utilize tracking for measurable goals:** YES  NO

**If so, does the permittee provide justification in the SWMP for tracking measurable goals?**

YES  NO  NA

**Do the measurable goals contain sufficient clear, specific, and measurable detail?**

YES  NO

**At what frequency are BMPs/MCMs evaluated?** Annually  By Permit Cycle  Other

**No Action Needed  :**

**Recommendations  :**

**Action Required  :**

**Comments:**



**MCM #4 - CONSTRUCTION SITE STORMWATER RUNOFF CONTROL:**

The permit requires the regulated MS4 to implement (for new MS4s, this includes the development) and enforce a program to reduce pollutants in any stormwater runoff to their regulated MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan or development or sale that would disturb one acre or more. As part of the Stormwater Management Program as a whole, the permittee shall include all BMPs in their SWMP, which include the BMPs listed in the permit, or the agreed upon alternative BMPs, at a minimum. The BMPs are as follows:

**MCM #4 – 4.4.A Permit requirement –** The permittee shall have an ordinance and/or other regulatory mechanism to require construction site operators to implement erosion and sediment control BMPs at construction/land disturbance sites.

1. The ordinance or regulatory mechanism shall include sanctions which are designed to ensure compliance, to the extent allowable under state, or local law.
2. The SWMP must contain a copy of or a link to the relevant ordinance or regulatory mechanism.

**Does the permittee have an ordinance, or similar, that requires construction site operators to implement erosion and sediment control BMPs at construction sites for construction of one acre or more or less if part of a common plan or development, and include sanctions designed to ensure compliance?** *(Note: All MS4s past their first full permit cycle should have an ordinance, or similar, in place. Established MS4s beyond their first full permit cycle who do not have an ordinance, or similar, in place are considered to have a non-compliant Stormwater Program and unapprovable SWMP.)*

YES  NO

**Does the ordinance, or similar, include sanctions designed to ensure compliance?**

YES  NO

**Does the SWMP include a copy of the permittee’s ordinance or is a weblink provided in the SWMP?** YES  NO

If the permittee needs to develop this mechanism, the permittee must include a schedule of implementation in the SWMP.

**Does the permittee need to develop this mechanism?** YES  NO

**If yes, does the SWMP describe the permittee’s schedule for when an ordinance or other mechanism will be established and implemented?** YES  NO  NA

No Action Needed  : Recommendations : Action Required :

Comments:





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**MCM #4 – 4.4.B** Permit requirement – The permittee shall maintain requirements for construction site operators to:

1. Implement appropriate erosion and sediment control best management practices; and
2. Control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.

**Does the SWMP contain or describe the permittee’s requirements for construction site operators to implement appropriate erosion and sediment control BMPs? YES  NO**

**Does the permittee’s SWMP contain sufficient clear and specific detail for this permit requirement? YES  NO**

**Does the SWMP contain or describe the permittee’s requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality?**

YES  NO

**No Action Needed  :**

**Recommendations  :**

**Action Required :**

**Comments:**

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**MCM #4 – 4.4.C** Permit requirement – The permittee shall maintain and apply procedures for review of all pre-construction site plans for consideration of potential water quality impacts.

**Does the SWMP contain or describe the permittee’s procedures for reviewing pre-construction site plans? YES  NO**

**Do the permittee’s procedures contain sufficient clear and specific detail? YES  NO**

**Do the procedures specifically detail the permittee’s consideration of potential water quality impacts? YES  NO**

**No Action Needed  :**

**Recommendations :**

**Action Required :**

**Comments:**

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**MCM #4 – 4.4.D** – The permittee shall maintain and apply mechanisms for receipt and consideration of information submitted by the public.

**Does the SWMP contain or describe the permittee’s mechanisms for receiving and considering information submitted by the public.** YES  NO

No Action Needed  :                      Recommendations :                      Action Required :  
Comments:

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**MCM #4 – 4.4.E** Permit requirement – The permittee must maintain and apply procedures for site inspection and enforce control measures, this shall include prioritization of site inspection processes.

**Does the SWMP contain or describe the permittee’s procedures for inspecting construction sites and their enforcement control measures, including prioritization of site inspections?**  
YES  NO

**Do the permittee’s procedures contain sufficient clear and specific detail?** YES  NO

No Action Needed  :                      Recommendations :                      Action Required  :  
Comments:

.....  
**MCM #4 – 4.4.F** Permit requirement – The permittee shall inspect (or require inspection of) any structure that functions to prevent pollution of stormwater or to remove pollutants from stormwater and ensure that all BMPs are implemented and effective. This shall include a monitoring plan and/or documentation with implementation schedules described in the SWMP.

**Does the SWMP contain or describe the permittee’s procedures for inspection of any structures that function to prevent pollution of stormwater or to remove pollutants from stormwater?**  
YES  NO

**Do the permittee’s procedures contain sufficient clear and specific detail?** YES  NO

**Do the permittee’s construction site inspection procedures include the inspection of physical BMPs to ensure proper implementation and effectiveness?** YES  NO

**Do the permittee’s construction site inspection procedures include a monitoring plan and/or documentation with implementation schedules?** YES  NO

No Action Needed  :                      Recommendations :                      Action Required  :  
.....

**Comments:**

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**MCM #4 – 4.4.G Permit requirement** – The permittee shall maintain and apply a plan designed to ensure compliance with the permittee’s erosion and sediment control regulatory mechanism, this shall include the sanctions and enforcement mechanisms to be used.

**Does the SWMP contain or describe the permittee’s plan that is designed to ensure compliance with their erosion and sediment control regulatory mechanism?** YES  NO

**Does the permittee’s plan contain sufficient clear and specific detail?** YES  NO

**No Action Needed**  :

**Recommendations** :

**Action Required**  :

**Comments:**

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**MCM #4 – Does the SWMP sufficiently describe the permittee’s staff training program specific to this MCM’s BMPs?** (*Helpful guidance: The specific requirement for training is in MCM #6 under 4.6.A; however, because 4.6.A requires the explanation of how the permittee’s training program coordinates with all other MCMs, each MCM in this form will include a training evaluation placeholder specific to the MCM.*) YES  NO

**No Action Needed**  :

**Recommendations** :

**Action Required**  :

**Comments:**

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**MCM #4 – Measurable Goals/Evaluations**

Section 3.1.B of the MS4 2-step general permit (MO-R04) establishes that measurable goals shall contain a clear, well-defined, and detailed description of the BMP. The goal/expected result of each BMP, explaining in specific terms the objective or results of this BMP if it is successful and the pollutant(s) reduced. Clearly explained measurable goals which shall be established for each BMP or in conjunction with multiple BMPs. These goals shall be used to measure effectiveness over time.

These measurable goals may serve as BMP design objectives or goals that quantify the progress of implementation of the actions or performance of the permittee’s BMPs. Measurable goals should describe specific actions taken by the permittee to implement each BMP. Each measurable goal shall contain a statement clearly indicating how it will be established to determine the appropriateness of identified BMPs and progress toward the expected results of the BMP. Measurable goals shall be quantifiable when feasible; however, if it is not feasible to utilize a measurable goal that is quantifiable, then the permittee shall provide justification indicating why the measurable goal cannot be quantifiable. If applicable, measurable goals shall also include frequency and the dates for such actions, or utilize interim and completion milestone dates, and a periodic frequency of measurement to document progress. It is recommended that interim and final milestone dates are established with a format of month and year. If the format of month and year cannot be utilized, the permittee shall

ensure that schedules have the minimum format of 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> year of the operating permit. If not applicable, please note that in the SWMP. Clearly explain the method of documentation used for activities performed. Incorporate measurable elements to assess the outcomes of each BMP, include an annual (or more frequent) measurement to document progress, and a summary of that measurement. Measurable goals may be quantifiable, or when necessary, narrative, visual, or qualitative.

**Does the SWMP establish measurable goals for each BMP or for the MCM as a whole?**

BMP  MCM

**Does the SWMP establish how each BMP/MCM is evaluated?** YES  NO

**Does the evaluation determine if each BMP/MCM is effective?** YES  NO

**Are the measurable goals quantifiable?** YES  NO

**If no, does the permittee provide justification in the SWMP for using measurable goals that are not quantifiable?** YES  NO  NA

**Does the permittee utilize tracking for measurable goals?** YES  NO

**If so, does the permittee provide justification in the SWMP for tracking measurable goals?**  
YES  NO  NA

**Do the measurable goals contain sufficient clear, specific, and measurable detail?**

YES  NO

**At what frequency are BMPs/MCMs evaluated?** Annually  By Permit Cycle  Other

**No Action Needed**  :

**Recommendations**  :

**Action Required**  :

**Comments:**

.....

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

The permit requires the regulated MS4 to implement (for new MS4s, this includes the development) and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre including projects less than one acre that are part of a larger common plan of development or sale, that would disturb one acre or more, and that discharge into the permittee’s regulated MS4. As part of the Stormwater Management Program as a whole, the permittee shall include all BMPs in their SWMP, which include the BMPs listed in the permit, or the agreed upon alternative BMPs, at a minimum. The BMPs are as follows:

**MCM #5 – 4.5.A** Permit requirement – The permittee shall develop, and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for the community, including, but not limited to the assessment of site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance. The goal of this approach is to arrive at designs that protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions.

1. Details of these strategies to minimize water quality impacts shall be included in the SWMP.
2. The SWMP shall include a link to or copy of standards developed or adopted.

**Does the SWMP contain or describe the permittee’s strategies to minimize water quality impacts from post-construction runoff from new development or redevelopment projects?**

YES  NO

**Do the permittee’s strategies contain sufficient clear and specific detail?** YES  NO

**Does the SWMP clearly describe how the permittee’s strategies help to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions?**

YES  NO

**Does the SWMP contain a copy, include a weblink, or reference the standards developed or adopted?** YES  NO

No Action Needed  : Recommendations : Action Required  :

**Comments:**

*Superb!!!*

.....

**MCM #5 – 4.5.B** Permit requirement – Through ordinance, or other regulatory mechanism, the permittee’s Stormwater Management Program shall address post-construction runoff from new

development and redevelopment projects. The regulatory mechanism the permittee will use shall be identified in the SWMP by including a link to or a copy of the ordinance(s) or regulatory mechanism(s). If the permittee needs to develop a mechanism, the schedule for implementation shall be described in the SWMP.

**Does the permittee have an ordinance, or similar, that addresses post-construction runoff from new and redevelopment projects?** *(Note: All MS4s past their first full permit cycle should have an ordinance, or similar, in place. Established MS4s beyond their first full permit cycle who do not have an ordinance, or similar, in place are considered to have a non-compliant Stormwater Program and unapprovable SWMP.)* YES  NO

**Does the SWMP contain copies of the relevant sections of, or a weblink to, the permittee's ordinance, or similar, to address post-construction runoff from new development or redevelopment projects?** YES  NO

If the permittee needs to develop a relevant ordinance, or other similar mechanism, the permittee must include a schedule of implementation in the SWMP.

**Does the permittee need to develop an ordinance, or similar mechanism?** YES  NO

**If yes, does the SWMP describe the permittee's implementation schedule for when an ordinance or other mechanism will be established and implemented?** YES  NO  NA

**No Action Needed**  :                      **Recommendations**  :                      **Action Required**  :

**Comments:**

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MCM #5 – 4.5.C Permit requirement – The permittee shall maintain a plan to ensure adequate long-term operation and maintenance of post-construction BMPs, both structural and non-structural. Descriptions of and/or examples of agreements between the permittee and other parties such as post-development landowners or regional authorities shall be included in the SWMP.

**Does the SWMP contain or describe the permittee's plan to ensure adequate, long-term operation and maintenance of post-construction BMPs?** YES  NO

**Does the permittee's plan contain sufficient clear and specific detail?** YES  NO

**Does the SWMP contain or describe the permittee's post-development agreements for long-term operation and maintenance of post-construction BMPs?** YES  NO

**Does the permittee's post-development agreement contain sufficient clear and specific detail on BMP responsibility?** YES  NO

No Action Needed  : Recommendations  : Action Required  :

Comments:

*Excellent!*

.....  
MCM #5 – 4.5.D Permit requirement – The permittee shall maintain and apply an inspection plan with implementation schedules for post-construction BMPs.

**Does the SWMP contain or describe an inspection plan with implementation schedules for post-construction stormwater BMPs?** YES  NO

**Does the permittee’s plan contain sufficient clear and specific detail?** YES  NO

No Action Needed  : Recommendations  : Action Required  :

Comments:

.....  
MCM #5 – 4.5.E Permit requirement – The permittee shall inspect or require the inspection of post-construction stormwater BMPs to ensure all BMPs are implemented and effective.

**Does the SWMP contain or describe the permittee’s plan for inspecting post-construction BMPs?** YES  NO

**Does the permittee’s plan contain sufficient clear and specific detail?** YES  NO

**Does the permittee’s plan sufficiently describe how the permittee determines if the BMPs are being implemented and effective?** YES  NO

No Action Needed  : Recommendations  : Action Required  :

Comments:

.....  
MCM #5 – **Does the SWMP sufficiently describe the permittee’s staff training program specific to this MCM’s BMPs?** (*Helpful guidance: The specific requirement for training is in MCM #6 under 4.6.A; however, because 4.6.A requires the explanation of how the permittee’s training program coordinates with all other MCMs, each MCM in this form will include a training evaluation placeholder specific to the MCM .*) YES  NO

No Action Needed  : Recommendations  : Action Required  :  
.....

**Comments:**

.....  
**MCM #5 – Measurable Goals/Evaluations**

Section 3.1.B of the MS4 2-step general permit (MO-R04) establishes that measurable goals shall contain a clear, well-defined, and detailed description of the BMP. The goal/expected result of each BMP, explaining in specific terms the objective or results of this BMP if it is successful and the pollutant(s) reduced. Clearly explained measurable goals which shall be established for each BMP or in conjunction with multiple BMPs. These goals shall be used to measure effectiveness over time. These measurable goals may serve as BMP design objectives or goals that quantify the progress of implementation of the actions or performance of the permittee's BMPs. Measurable goals should describe specific actions taken by the permittee to implement each BMP. Each measurable goal shall contain a statement clearly indicating how it will be established to determine the appropriateness of identified BMPs and progress toward the expected results of the BMP. Measurable goals shall be quantifiable when feasible; however, if it is not feasible to utilize a measurable goal that is quantifiable, then the permittee shall provide justification indicating why the measurable goal cannot be quantifiable. If applicable, measurable goals shall also include frequency and the dates for such actions, or utilize interim and completion milestone dates, and a periodic frequency of measurement to document progress. It is recommended that interim and final milestone dates are established with a format of month and year. If the format of month and year cannot be utilized, the permittee shall ensure that schedules have the minimum format of 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> year of the operating permit. If not applicable, please note that in the SWMP. Clearly explain the method of documentation used for activities performed. Incorporate measurable elements to assess the outcomes of each BMP, include an annual (or more frequent) measurement to document progress, and a summary of that measurement. Measurable goals may be quantifiable, or when necessary, narrative, visual, or qualitative.

**Does the SWMP establish measurable goals for each BMP or for the MCM as a whole?**

BMP  MCM

**Does the SWMP establish how each BMP/MCM is evaluated?** YES  NO

**Does the evaluation determine if each BMP/MCM is effective?** YES  NO

**Are the measurable goals quantifiable?** YES  NO

**If no, does the permittee provide justification in the SWMP for using measurable goals that are not quantifiable?** YES  NO  NA

**Does the permittee utilize tracking for measurable goals?** YES  NO

**If so, does the permittee provide justification in the SWMP for tracking measurable goals?**

YES  NO  NA

**Do the measurable goals contain sufficient clear, specific, and measurable detail?**

YES  NO

**At what frequency are BMPs/MCMs evaluated?** Annually  By Permit Cycle  Other



No Action Needed  :

Recommendations  :

Action Required  :

Comments:



## **MCM #6 - POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS:**

The permit requires the regulated MS4 to implement (for new MS4s, this includes the development) an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. As part of the Stormwater Management Program as a whole, the permittee shall include all BMPs in their SWMP, which include the BMPs listed in the permit, or the agreed upon alternative BMPs, at a minimum. The BMPs are as follows:

**MCM #6 – 4.6.A** Permit requirement – MCM #6 must include an employee training program for municipal operations staff who work with material handling, at municipal vehicle or equipment maintenance areas, storage yards, and material storage facilities. The training shall be used to prevent and reduce stormwater pollution from activities such as, but not limited to, park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. The SWMP shall include:

1. A description of any existing, available training material the permittee plans to use such as those available from EPA, the state, or other organizations. Include the frequency of training and topics covered.
2. A description of how this training will coordinate with all other MCMs.
3. A description of how this training will coordinate with monitoring, Integrated Planning, and TMDL implementations where applicable.

**Does the permittee have an employee training program for municipal operations staff?**

YES  NO

**Does the permittee's employee training program contain sufficient clear and specific detail?**

YES  NO

**Does the SWMP contain or describe the permittee's employee training program for municipal operations staff?** YES  NO

**Does the SWMP contain or describe the permittee's employee training program material?**

YES  NO

**Does the permittee's plan describe how the permittee's employee training program will coordinate with all other MCMs?** YES  NO

**Does the permittee's plan describe how the permittee's employee training program will coordinate with monitoring, Integrated Planning, and TMDL implementation (where applicable)?** YES  NO  NA

No Action Needed  : Recommendations : Action Required  :

Comments:

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MCM #6 – 4.6.B Permit requirement – The permittee shall maintain an updated list of all municipal operations/facilities that are impacted by this operation and maintenance program.

**Does the SWMP include a list of all municipal operations/facilities that are impacted by the permittee’s operation and maintenance program? YES  NO**

No Action Needed  : Recommendations  : Action Required  :

Comments:

.....

MCM #6 – 4.6.C Permit requirement – The permittee shall maintain an updated list of industrial facilities that the permittee owns or operates that are subject to NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the permittee’s MS4. The permittee shall include the permit number or a copy of the No Exposure Exemption Certification (if applicable) for each facility in the SWMP. NPDES permitted facilities not owned or operated by the permittee are not required to be part of this list; however, the permittee should be familiar with all such facilities in their MS4 service area as they may signify a priority area for the IDDE (MCM #3) program.

**Does the SWMP include a list of all industrial facilities the permittee owns or operates that are subject to NPDES permits for discharge of stormwater associated with industrial activities that discharge to the permittee’s MS4? YES  NO  NA**

**Does the SWMP include the permit number or a copy of the No Exposure Exemption Certification (if applicable) for each facility? (NPDES permitted facilities not owned or operated by the permittee are not required to be a part of this list.) YES  NO  NA**

No Action Needed  : Recommendations : Action Required :

Comments:

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MCM #6 – 4.6.D Permit requirement – The permittee shall develop or maintain controls for reducing or eliminating the discharge of floatables and pollutants from municipal parking lots, maintenance and storage yards, waste transfer station, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas owned or operated by the permittee, or other locations expected to contribute floatables and/or pollutants.

**Does the SWMP contain or describe the permittee’s controls to reduce floatables and other pollutants from municipal operations/facilities to the permittee’s MS4? YES  NO**

**Does the permittee’s SWMP contain sufficient clear and specific detail describing the permittee’s controls? YES  NO**

**No Action Needed  : Recommendations : Action Required  :  
Comments:**

.....

MCM #6 – 4.6. E Permit requirement – The permittee shall maintain and apply maintenance procedures, maintenance schedules, and long-term inspection schedules for controls to reduce floatables and other pollutants to the permittee’s regulated MS4.

**Does the SWMP contain or describe the permittee’s controls for reducing floatables and other pollutants to the permittee’s MS4? YES  NO**

**Does the permittee’s SWMP contain sufficient clear and specific detail describing the permittee’s controls? YES  NO**

**No Action Needed  : Recommendations : Action Required  :  
Comments:**

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MCM #6 – 4.6.F Permit requirement – The permittee shall utilize procedures for the proper disposal of waste removed from the separate storm sewers and areas of jurisdiction, including dredged material, accumulated sediments, floatables and other debris.

**Does the SWMP contain or describe the permittee’s procedures for the proper disposal of waste removed from the separate storm sewers and areas of jurisdiction, including dredge material, accumulated sediments, floatables and other debris? YES  NO**

**Do the permittee’s procedures contain sufficient clear and specific detail? YES  NO**

**No Action Needed  : Recommendations : Action Required  :  
Comments:**

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**MCM #6 – 4.6.G** Permit requirement – The permittee shall utilize procedures for the washing of municipal vehicles and equipment.

1. Use of any soap or detergent shall only be where there is connection to sanitary sewer or equivalent; and
2. Any wash water that contains pollutants such as salt, oils, grease, sediment, grass clippings, lawn chemicals, or pesticides shall not be discharged to waters of the state or the MS4 system without appropriate treatment to ensure the discharged effluent is in compliance with Missouri Water Quality Standards.

**Does the SWMP contain or describe the permittee’s procedure(s) for the washing of municipal vehicles and equipment?** YES  NO

**Does the permittee’s procedure contain sufficient clear and specific detail?** YES  NO

**Do the permittee’s procedure(s) include the use of soap or detergents?** YES  NO

**If so, do the permittee’s procedure(s) comply with the permit requirement specifying the use of any soap or detergent?** YES  NO  NA

**Do the permittee’s procedure(s) include sufficient details specific to the handling of wash water containing pollutants?** YES  NO

**No Action Needed**  :                      **Recommendations**  :                      **Action Required** :

**Comments:**



**MCM #6 – 4.6.H** Permit requirement – All paints, solvents, petroleum products and petroleum waste products (except fuels) under the control of the permittee shall be stored so that these materials are not exposed to stormwater.

1. Sufficient practices of spill prevention, control, and/or management shall be provided to prevent any spill of these pollutants from entering waters of the state.
2. Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater.

**Does the permittee’s SWMP contain sufficient clear and specific detail addressing this permit requirement?** YES  NO

**Does the SWMP sufficiently describe how the permittee stores all paints, petroleum products and waste products (except fuels) to protect them from exposure to stormwater?**  
YES  NO

**Does the SWMP include or describe sufficient practices for spill prevention, control and/or management to prevent any spill of these pollutants from entering waters of the state?**

YES  NO

**Are any containment systems utilized?** YES  NO

**Are the containment systems sufficiently described in the SWMP?** YES  NO  NA

**If so, are the containment systems used to implement this requirement constructed of material compatible with the substances and capable of preventing the contamination of ground water?**

YES  NO  NA

**No Action Needed**  :                      **Recommendations**  :                      **Action Required**  :

**Comments:**



**MCM #6 – 4.6.I Permit requirement** – If the permittee has new flood management projects (projects developed or designed to reduce flooding), the permittee shall utilize procedures to assess all flood management projects for water quality, incorporating water quality protection devices or practices.

**Does the SWMP contain or describe the permittee’s procedure(s) for assessing flood management projects for water quality, if applicable?** YES  NO  NA

**Does the permittee’s procedure contain sufficient clear and specific detail?**

YES  NO  NA

**No Action Needed**  :                      **Recommendations**  :                      **Action Required**  :

**Comments:**



**MCM #6 – Does the SWMP sufficiently describe the permittee’s staff training program specific to this MCM’s BMPs?** (*Helpful guidance: The specific requirement for training is in MCM #6 under 4.6.A; however, because 4.6.A requires the explanation of how the permittee’s training program coordinates with all other MCMs, each MCM in this form will include a training evaluation placeholder specific to the MCM.*) YES  NO

**No Action Needed**  :                      **Recommendations**  :                      **Action Required**  :

**Comments:**



**MCM #6 – Measurable Goals/Evaluations**

Section 3.1.B of the MS4 2-step general permit (MO-R04) establishes that measurable goals shall

contain a clear, well-defined, and detailed description of the BMP. The goal/expected result of each BMP, explaining in specific terms the objective or results of this BMP if it is successful and the pollutant(s) reduced. Clearly explained measurable goals which shall be established for each BMP or in conjunction with multiple BMPs. These goals shall be used to measure effectiveness over time. These measurable goals may serve as BMP design objectives or goals that quantify the progress of implementation of the actions or performance of the permittee's BMPs. Measurable goals should describe specific actions taken by the permittee to implement each BMP. Each measurable goal shall contain a statement clearly indicating how it will be established to determine the appropriateness of identified BMPs and progress toward the expected results of the BMP. Measurable goals shall be quantifiable when feasible; however, if it is not feasible to utilize a measurable goal that is quantifiable, then the permittee shall provide justification indicating why the measurable goal cannot be quantifiable. If applicable, measurable goals shall also include frequency and the dates for such actions, or utilize interim and completion milestone dates, and a periodic frequency of measurement to document progress. It is recommended that interim and final milestone dates are established with a format of month and year. If the format of month and year cannot be utilized, the permittee shall ensure that schedules have the minimum format of 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup> year of the operating permit. If not applicable, please note that in the SWMP. Clearly explain the method of documentation used for activities performed. Incorporate measurable elements to assess the outcomes of each BMP, include an annual (or more frequent) measurement to document progress, and a summary of that measurement. Measurable goals may be quantifiable, or when necessary, narrative, visual, or qualitative.

**Does the SWMP establish measurable goals for each BMP or for the MCM as a whole?**

BMP  MCM

**Does the SWMP establish how each BMP/MCM is evaluated?** YES  NO

**Does the evaluation determine if each BMP/MCM is effective?** YES  NO

**Are the measurable goals quantifiable?** YES  NO

**If no, does the permittee provide justification in the SWMP for using measurable goals that are not quantifiable?** YES  NO  NA

**Does the permittee utilize tracking for measurable goals?** YES  NO

**If so, does the permittee provide justification in the SWMP for tracking measurable goals?**

YES  NO  NA

**Do the measurable goals contain sufficient clear, specific, and measurable detail?**

YES  NO

**At what frequency are BMPs/MCMs evaluated?** Annually  By Permit Cycle  Other

**No Action Needed**  :

**Recommendations**  :

**Action Required**  :

**Comments:**

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