

PREPARING FOR THE MS4 RECORDS REVIEW

1. Have records available at the one meeting location established for the audit. If documents/files are located in different Departments at different locations, then temporarily transfer them (or have copies of them) to the meeting room location.
2. Have records organized by Section VII, Part III.A.1 through Part III.A.9.c of the annual report.
3. Assemble the records/documents that you reported in the annual report.
3. Have all records that document the activity was conducted. For example, an e-mail from another Department that provides xx number of activities were performed is not the record; this e-mail is just a summary of the total number that was then reported in the annual report. The records from the Department that document that the activities were conducted, when, where, what need to be provided during the audit.
4. Have the records, reports, or handwritten calculations that document the total number of activities reported in the annual report.

Below are examples of the types of records that you might have that document the activities conducted and the number of activities conducted. This is not a complete, comprehensive, or definitive list. Each permittee has its own unique process and procedures for documenting implementation of the stormwater program activities.

Part III.A.1 Structural Controls and Stormwater Collection Systems Operation

Inventory

- Map of major outfalls
- List of all outfalls
- List/map of stormwater ponds
- List/map of ditches
- List/map of inlets/grates/catch basins
- List/map of pollution control boxes (baffle boxes, swirl)
- List/map of exfiltration ditches
- Map of pipes/TV of pipes

Maintenance and Inspection Activities

- Daily work orders, daily crew log, daily activity report (whatever initial document that records the activity has been conducted) for each structural control
- Written schedule of inspection and/or maintenance activities (if activities are conducted based on a schedule)
- Printouts from electronic databases or tracking spreadsheets that provide the total number of inspection and maintenance activities for each structural control reported in the annual report
- Handwritten calculations of totals of inspection and maintenance activities reported in the annual report (numbers, miles, feet, etc.)
- If any number is an estimate, then a written description or handwritten calculations showing how the number was derived

Part III.A.2 Areas of New Development and Significant Redevelopment

Part III.A.3 Roadways

Litter Control - Records that document the frequency, amount of litter collected, and ROW miles maintained

- Daily work orders, daily crew log, daily activity report (whatever initial document that records the activity, miles or acres maintained, and/or amount of litter collected)
- Contracts with ROW listed (or map of areas) and frequency specified
- Invoices from contractors/ reports from contractors on areas patrolled, amount of litter collected
- Written schedule of litter pick-up
- If any number is an estimate, then a written description or handwritten calculations showing how the number was derived

Street Sweeping

- Daily work orders, daily crew log, daily activity report (whatever initial document that records the activity, miles, and/or amount of street sweeping material collected)
- Contracts with streets listed (or map of areas) and frequency specified
- Written schedule of street sweeping
- If any number is an estimate, then a written description or handwritten calculations showing how the number was derived

Equipment storage yards and maintenance shops

- List of facilities
- Inspection checklists with name of facility, date of inspection, stormwater BMPs evaluated

Part III.A.4 Flood Control Projects

- List of CIPs with status – proposed, active, complete
- Contracts issued for the project work

Part III.A.5 Municipal Waste Treatment, Storage, and Disposal Facilities Not Covered by an NPDES Stormwater Permit

- List of facilities
- Inspection checklists with name of facility, date of inspection, stormwater BMPs evaluated

Part III.A.6 Pesticides, Herbicides, and Fertilizer Application

Public outreach and education

- Brochures/flyers/fact sheets distributed
 - list/log of the brochures and number distributed, printing invoices
- Newspaper articles
 - copy of the articles printed, date, and name of newspaper
- Newsletter articles
 - copy of the articles printed, date, and name of newsletter
- TV/Radio announcements
 - copy or description of announcement, dates ran, name of TV/radio channel
- Public displays
 - list of the public displays, locations, dates, pictures
- Special events
 - list of special events, locations, dates, pictures
- Seminar/workshops
 - list/tracking spreadsheet/log with title of seminar/workshop, location, date given, topics discussed, staff calendar with handwritten notations on location and topic
- Neighborhood presentations
 - list/tracking spreadsheet/log with title of seminar/workshop, location, date given, topics discussed, staff calendar with handwritten notations on location and topic
- School presentations
 - list/tracking spreadsheet/log with title of seminar/workshop, location, date given, topics discussed, staff calendar with handwritten notations on location and topic
- Web site
 - copy of pages posted on Web site, Web site URL address
- Utility bill insert
 - copy of utility bill insert, date mailed

Training

- Sign-in Sheet (needs to provide title of training course, date, and names of attendees)
- Training course agenda and date

Licensed applicators (staff and contractors)

- Copies of most current licenses of staff and contractors

- Contract that stipulates contractors are to be licensed (this may be substituted for copy of contractor licenses)

Part III.A.7 Illicit Discharges and Improper Disposal — Inspections, Ordinances, and Enforcement Measures

Pro-active inspections

- Inspection checklists
- Printouts from electronic database listing the name/locations, dates of inspections, inspection findings (will also need to provide some samples of completed inspection checklists) (or hard copies of inspection forms or log indicating the same if database does not exist)

Investigation of Suspected Illicit Discharges and/or Improper Disposal

- Printouts from electronic database listing the name/locations, dates of investigations, type of incident, findings (indication of illicit discharge, connection, dumping), whether incident was resolved
- Log of investigations with date, location, findings

Illicit discharge training

- Sign-in Sheet (needs to provide title of training, date, and names of attendees)

Spill Prevention and Response incidents

- Printouts from electronic database listing the name/locations, dates of incidents, type of incident, spill response provided (indication of clean-up), whether spill entered or had potential to enter MS4

Spill response training

- Sign-in Sheet (needs to provide title of training, date, and names of attendees)
- Training Certificates with name, date and title of training course

Public outreach and education on illicit discharge

- See list above under A.6

Public outreach and education on proper disposal of Oils, Toxics, and Household Hazardous Waste

- See list above under A.6

Limitation of Sanitary Sewer Seepage

- Log/spreadsheet/report on sanitary sewage seepage and resolution
- Log/spreadsheet/report on sanitary sewer overflows (SSOs)

Part III.A.8 Industrial and High-Risk Runoff

Inventory

- List of high risk facilities – name, location/address
- EPA EPCRA 313 facilities list (most current one from EPA's web site)
- List of new high risk facilities (or the new ones identified on the list of high risk facilities)
- Or any other facility that the permittee determines is contributing a substantial pollutant loading to the MS4

Inspections

- Inspection checklists with names of facilities, dates of inspections, stormwater BMPs and potential for stormwater contamination evaluated
- Printouts from electronic database listing the names of facilities, dates of inspections, inspection findings (will also need to provide some samples of completed inspection checklists)
- Enforcement actions taken for violations – copies of the NOVs, fines

Monitoring

- Sampling document of location and date collected
- If analyzed, copy of laboratory report

Part III.A.9 Construction Site Runoff

Site Plan Reviews for and Non-Structural and Structural Best Management Practices

- Plan Review checklists
- Plan Review tracking log/database/spreadsheet with date of review, status (approved/in review), review comments
- Written procedure for review of plans for compliance with stormwater codes/regulations/stormwater erosion & sediment controls
- Letters/memos containing comments on erosion & sediment control plans
- Pre-construction meetings with date, name of applicant/project, and indication that erosion and sediment control requirements were reviewed and commented upon.

Construction site inspections and enforcement

- Inspection checklists for private sites
- Inspection checklists for municipal sites
- Inspection log book per site or printouts from electronic database of inspections per site
- Copies of all enforcement actions reported in the annual report (Notices of Violation, Stop Work Orders)

Training

- Sign-in Sheet (needs to provide title of training, date, and names of attendees)
- Certifications/Training Certificates

Notification to applicants of DEP CGP requirements for sites > 1 acre

- Copy of the notification provided to applicants
- Written procedure of who is to receive the notification and how/when the notification is to be provided to the applicant
- Log of applicants receiving the notification