



*More than a Project™*

# DEVELOPING A PROGRAM TO ACHIEVE THE REQUIREMENTS OF MCM6

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# MCM6 PROGRAM

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## Sections of MS4GP

Review of 4.7 (a), (b), (c), bit of (f) and (h), 4.8, and 4.9

## Reviewing

- » Development or update of MCM6 program
- » Inventory of MS4 Facilities
- » Annual Assessment
- » Certification
- » Deadlines

# DEVELOPMENT OR UPDATE

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- » Start by gathering materials from your operations and activities:
  - » Existing: Should already have SWPPPs & inspections, SOPs, identification of activities, tracking methods for wastes and maintenance
  - » New: What and how is it done? Street sweeping, maintenance, salt storage, facilities, personnel training...
- » Compare current activities to MS4GP language
  - » Existing: What needs added and what is no longer required?
  - » New:
    - Don't reinvent – use materials available from USEPA, INAFSM, LTAP, etc.
    - What is already tracked and recorded?
- » Mark off completed items on MS4GP as you go

# MAJOR COMPONENTS

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- » Inventory of MS4 facilities and map
- » Annual assessment of MS4 facilities
- » Stormwater Pollution Prevention Plans (INAFSM has a basic template)
  - » Quarterly site inspections
  - » Operational activities and procedures at MS4 site(s):
    - Wash water
    - Disposing of animal waste
    - Snow disposal area(s)
    - Salt management and storage
    - Spill prevention, spill kits
    - Facility stormwater maintenance

# MAJOR COMPONENTS

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- » Employee training – operations to administration
- » Street and parking lot sweeping (if completed) – schedule, route/map, disposal
- » Surface visual inspections – captures observations of municipal employees while doing daily tasks
- » MS4 stormwater infrastructure maintenance:
  - » Written operation and maintenance plan = SOPs, schedule, map (if available)
  - » Activity = cleaning, televising, inspections, repairs, etc.
  - » Disposal procedures for materials removed from system
  - » Records of completion
- » Third-party practices
- » Flood control structures

# INVENTORY OF MS4 FACILITIES

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**Wastewater**



**Drinking Water**



**Stormwater/Sewers**



**Street/Maintenance**



**Parks & Recreation**



**Administration**

Develop and/or maintain an inventory of MS4 owned and/or operated facilities where activities or storage require stormwater pollution prevention planning. The inventory must, at a minimum include:

- 1) A facility location map
- 2) The facility name or description of the facility and the street address or if an address is not available the latitude and longitude of each facility to a 5 decimal degree accuracy at the entrance to the facility
- 3) A list of stormwater and wastewater permits issued to the facility, including the permit number
- 4) Identification of facilities that have the greatest potential to generate stormwater pollution
- 5) The manager and an alternate contact person for each facility; including contact information

# INVENTORY OF MS4 PROPERTIES

## MCM6 - MUNICIPAL OPERATIONS POLLUTION PREVENTION AND GOOD HOUSEKEEPING

NAME	ADDRESS	LATITUDE	LONGITUDE	SITE PERMITS	CONTACT	ALTERNATE CONTACT	PRIORITY SITE? (Y/N)	SWPPP? (Y/N)
Circle Park	1355 W. Kyger St.	40.289966	-86.527033		Bart Kraning	Jim Spears	N	N
Dorner Park	858 S. Clay St.						N	N
Fire Department - HQ Station #1	257 S. Clay St.						Y	Y
Fire Department - Station #2	508 N. Main St.						Y	Y
Fire Department - Station #3	1400 W. Barner St.						Y	Y
Frankfort Lagoons	977 N. Union Rd.						N	N
John Redmon Park	1080 S. Third St.						N	N
Lawrence Ferrell Park	Fudge Ave. & N. Maish Rd.	40.285476	-86.490212				N	N
Luther Howe Park	1600 W. Green St.	40.287646	-86.531969			Jim Spears	N	N
Neighborhood Center	259 S. Third St.	40.279005	-86.516787		Bart Kraning	Jim Spears	N	N
Old Stoney Building	301 E. Clinton St.	40.279884	-86.508934	Non-Contact Cooling ING250034	Don Stock	Jim Spears	N	N
Parks Department	1 Adrian Marks Dr.	40.293139	-86.505322		Bart Kraning	Jim Spears	Y	Y
Petting Zoo	1 Adrian Marks Dr.	40.292472	-86.504372		Bart Kraning	Jim Spears	N	N
Police Department	201 W. Washington Street	40.281326	-86.51349		Scott Shoemaker	Jim Spears	N	N
Power & Light Department	1000 Washington Ave.	40.286791	-86.498577		Phil Ferrel	Jim Spears	Y	Y
Prairie Creek Park	260 E. Washington St.	40.281972	-86.509837		Bart Kraning	Jim Spears	N	N
Sewer Department	300 N. Columbia St.	40.282888	-86.514026		Jim Spears	Jim Spears	Y	Y
Street Department	905 Burlington Ave.	40.288664	-86.498043		Jason Forysthe	Jim Spears	Y	Y
TPA Park	1 Adrian Marks Dr.	40.291635	-86.504017		Bart Kraning	Jim Spears	N	N
TPA Park Aviary	1 Adrian Marks Dr.	40.293127	-86.505577		Bart Kraning	Jim Spears	N	N
Veteran's Park	2 W. Washington St.	40.281934	-86.512235		Bart Kraning	Jim Spears	N	N
Water Department	2105 W. Armstrong Ave.	40.269534	-86.538315		Chris Hensley	Jim Spears	Y	Y
Wastewater Treatment Plant	45 W. CR 100 N.	40.299083	-86.507361	POTW NPDES IN0022934	PJ Whitaker	Jim Spears	Y	Y

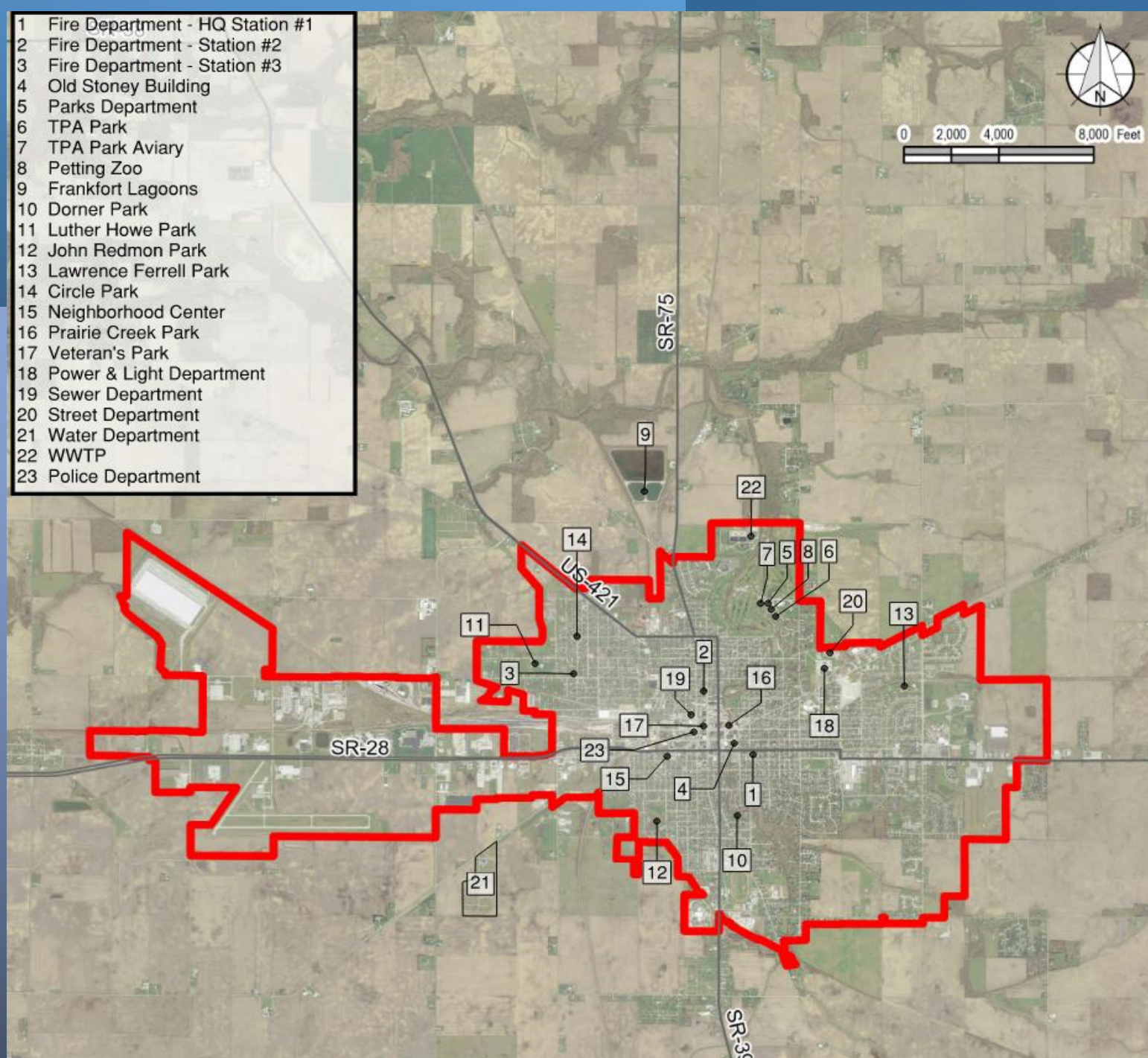
Include operational permits; not CSGP permits

Sites that use, store, or discharge pollutants that may degrade water quality

# FACILITY MAP

Include in map:

- Identify sites on the map
- MS4 Boundary
- Major roads
- Waterways (optional)
- Scale
- North arrow
- Legend

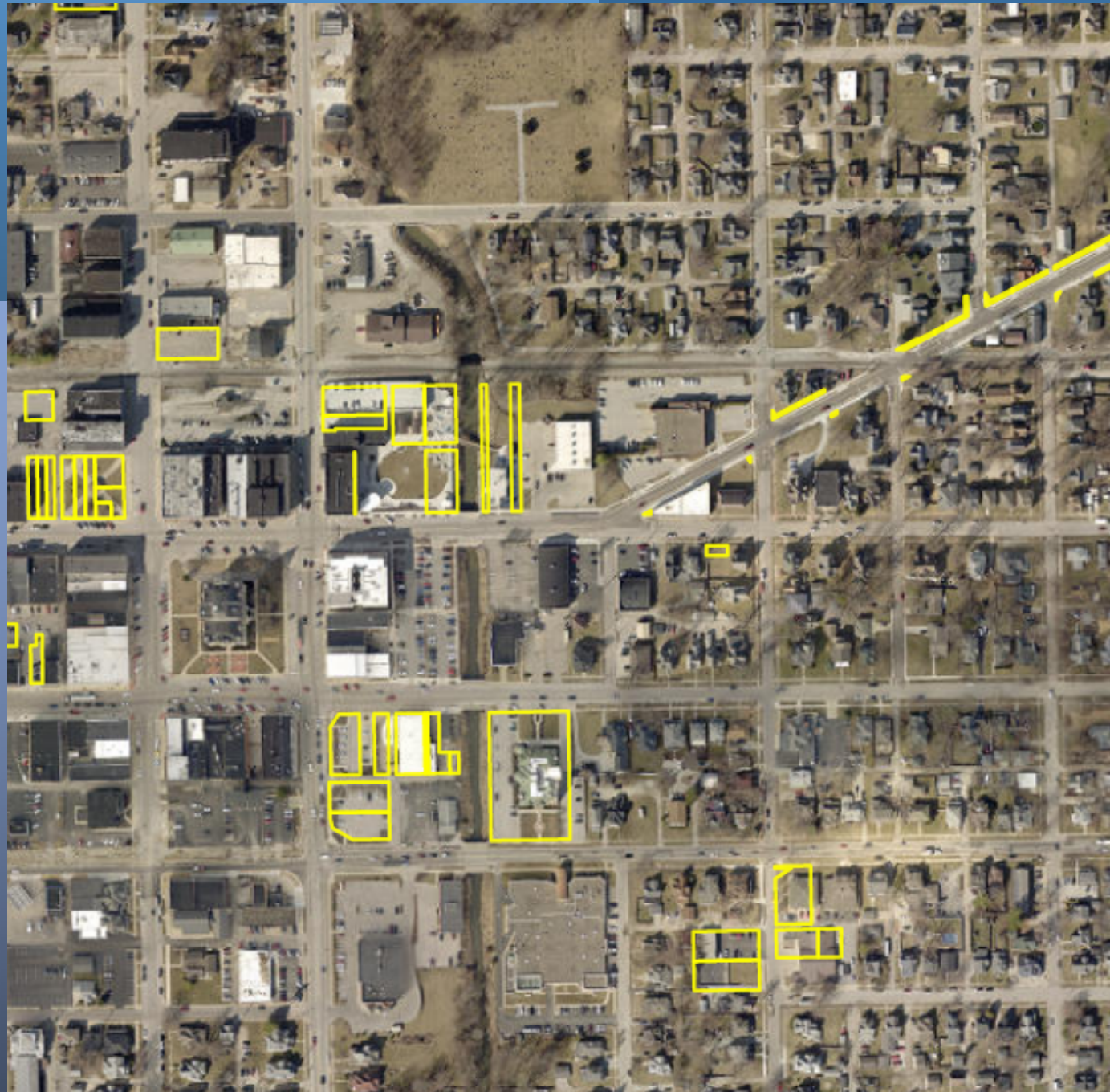




# INVENTORY TIPS

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- ❑ Identify from known sites/local knowledge
- ❑ Obtain a list of insured properties
  - May include easements, abandoned properties, and equipment
- ❑ Name search in Beacon or GIS for the MS4 as the property owner
  - Use different versions of MS4 name (city, board, commissioners, etc.)




# INVENTORY TIPS

☐ Priority Sites = outdoor storage/activities with pollutants that would “move” with stormwater

- Stockpiles
- Full drums of chemicals, open/empty drums with residuals
- Open dumpsters with holes
- Leaking vehicles/equipment

☐ If not available on GIS, get longitude & latitude from online mapping: [Latitude and Longitude of a Point \(getlatlong.net\)](http://getlatlong.net)

To find the latitude and longitude of a point you can do any of the following...



1. Press and Hold the Shift Key then Click on the point on the map.
2. Drag the red marker (Press and Hold the mouse button until the marker pops up) .
3. Enter the Address

## Latitude and Longitude of a Point



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### Get the Latitude and Longitude of a Point

When you click on the map, move the marker or enter an address the latitude and longitude coordinates of the point are inserted in the boxes below.

Latitude:   
Longitude:   
Combined:

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	Degrees	Minutes	Seconds
Latitude:	<input type="text" value="40"/>	<input type="text" value="17"/>	<input type="text" value="5.3844"/>
Longitude:	<input type="text" value="-86"/>	<input type="text" value="30"/>	<input type="text" value="44.6796"/>

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### Show Point from Latitude and Longitude

Use this if you know the latitude and longitude coordinates of a point and want to see where on the map the point is.  
Use: + for N Lat or E Long - for S Lat or W Long.  
Example: +40.689060 -74.044636  
Note: Your entry should not have any embedded spaces.

Decimal Deg. Latitude:   
Decimal Deg. Longitude:

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Example: +34 40 50.12 for 34N 40' 50.12"

	Degrees	Minutes	Seconds
Latitude:	<input type="text"/>	<input type="text"/>	<input type="text"/>
Longitude:	<input type="text"/>	<input type="text"/>	<input type="text"/>

# ANNUAL ASSESSMENT

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- » Complete an Annual Assessment of all MS4 owned and/or operated facilities that use, store, or discharge pollutants that may degrade water quality = designated Priority Sites from Inventory with a SWPPP
- » Completed by MS4 Coordinator or outside entity (e.g., someone knowledgeable)
- » The assessment should be based on the pollutants that are associated with the facility. The assessment, at a minimum must:
  - 1) Identify the potential pollutants that are stored and used at each facility
  - 2) Assess the existing operations at each facility. This must include, but is not limited to material storage, housekeeping practices, erosional features, vehicle washing, proximity of activities to drains and outfalls
  - 3) Identify and map existing structural and non-structural stormwater management measures that have been implemented to address each type of pollutant and/or sources of pollutants

# ANNUAL ASSESSMENT

## HOW TO START



- » Start with SWPPP Quarterly Inspection form
  - » Identifies storage areas and activities for the site that will be reviewed
- » Review completed inspections for the last 3 to 4 quarters
  - » Identifies any issues in the past that should be reviewed to see if they were corrected or are reoccurring
- » Print out the SWPPP Quarterly Inspection Form and Site Map
  - » Highlight items that were identified for corrective actions
- » Identify potential pollutants
  - » What pollutants are associated with the site?

# POTENTIAL POLLUTANTS

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## Parks/Recreation

- » Animal waste
- » Facility location
- » Fertilizers/pesticides
- » Fuels

## Street/Highway

- » Fuels/chemicals
- » Salt and other stockpiles
- » Oils and fuels
- » Vehicle washing
- » Maintenance
- » Outside storage



## Water/Wastewater/Stormwater

- » Fuels/chemicals
- » Oils and fuels
- » Vehicle washing
- » Maintenance
- » Stockpiles
- » Outside equipment storage

## Administration/All Sites

- » Litter
- » Grass clippings
- » General Trash
- » Parking lot drips and debris

# ANNUAL ASSESSMENT

## SITE INSPECTION



- » Have the person typically completing the quarterly inspection with you on the walk-around
  - » Discuss what is being observed or documented on inspection form
- » Take pictures of issues to document on inspection form to clearly identify corrective actions
- » Take pictures of new areas or activities as a reminder for when the SWPPP is updated
- » Inspect existing structural stormwater management measures – required for MS4-owned measures each term

# ANNUAL ASSESSMENT

## FOLLOW - UP



- » Document observations on the Inspection Form
  - » Acts as a quarterly inspection completed by MS4 Coordinator
- » Identify issues and recommended corrective actions
  - » Use pictures to identify observed conditions
  - » Provide to site to fix
  - » Document on inspection form that items were corrected
- » Document structural BMP inspection for site

# ANNUAL ASSESSMENT

## FOLLOW - UP



- » SWPPP updates
  - » Add any new activities, pollutants, storage areas to SWPPP
  - » Confirm ALL drains and inlets are identified, mapped, and labeled
  - » Confirm structural measures are mapped
    - » Swales, swales, inlet bags, ponds, containment, etc.
  - » Confirm non-structural measures are mapped
    - » Spill kits, designated storage areas
- » Provide updated SWPPP to site



# MCM CERTIFICATION

- ❑ Only for NEW MS4s
- ❑ Submit to IDEM after program is developed or 365 days from the date the initial NOI was received by IDEM.
  - Form says 365 days from NOI submittal date
- ❑ Rule 13 form still in use and on IDEM's website.  
[www.in.gov/idem/forms/idem-agency-forms/#owq](http://www.in.gov/idem/forms/idem-agency-forms/#owq)



**RULE 13 –**  
**Certification of the Development and Implementation of a Program to Reduce Pollutant Run-Off from Municipal Operations for the Municipal Operations Pollution Prevention and Good Housekeeping MCM**  
State Form 51281 (R3 / 4-08)  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

For questions regarding this form, contact:  
IDEM – Rule 13 Coordinator  
100 North Senate Avenue, Rm 1255  
MC 65-42  
Indianapolis, IN 46204-2251  
Phone: (317) 234-1601 or  
(800) 451-6027, ext. 41601 (within Indiana)  
Web Access:  
<http://www.in.gov/idem> (Search for Stormwater)

- NOTE:**
- This form must be used to comply with section 17(b) of 327 IAC 15-13.
  - The program required under this MCM must be implemented within three hundred sixty-five (365) days of the Notice of Intent (NOI) letter submittal date.
  - Submit this completed form when the program has been developed and implemented.
  - Return this completed and signed form, and any required addenda by mail to the IDEM Rule 13 Coordinator at the address listed in the box on the upper-right.

Reset Form

## CERTIFICATION AND SIGNATURE

The State of Indiana requires \_\_\_\_\_ (MS4 Operator) to develop and implement a program to ensure that existing municipal, State or Federal operations are performed in ways that do not cause or contribute to contamination of storm water discharges. Written documentation of preventative maintenance, control measures, pesticide use minimization, proper waste disposal, waste reduction, and municipal employee training must be incorporated into this program. This program must be implemented within three hundred sixty-five (365) days of the Notice of Intent (NOI) letter submittal date.

► The following statement, required by the State of Indiana, and the accompanying signature serve as the required certification that the program has been developed and implemented per the requirements of 327 IAC 15-13 and authorized under NPDES permit number INR040\_\_\_\_\_.

*"I certify, under penalty of law, that this program and all required materials were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the above statement is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Authorized Signature<sup>1</sup>: \_\_\_\_\_ Date: \_\_\_\_\_  
(mm/dd/year)





Title<sup>2</sup>: \_\_\_\_\_  
(typed or printed)

<sup>1</sup>The "authorized signature" required above must be either that of the MS4 operator, or, if another entity is responsible for this MCM, the responsible individual.

<sup>2</sup>The "title" must either be "MS4 operator", or, if a responsible individual signs, the title of that individual and associated MS4 entity represented (for example, mayor of the City of Indianapolis).





# IMPLEMENTATION DEADLINES FOR MCM6

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-  07/05/2022 – Submittal of NOI (start date for all existing MS4s)
-  01/01/2023 – Submittal of SWQMP (existing) with updates to MCM6
-  07/05/2023 – Conduct Annual Facility Assessment (shift to calendar year)  
New MS4s to submit SWQMP & MCM6 Certification to IDEM  
(365 days from date NOI received by IDEM)
-  07/04/2027 – Surface Visual Inspections of entire system  
Completed update and implementation of MCM6 program

# ROUTINE DEADLINES FOR MCM6

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-  Quarterly:
  - Facility inspections
-  Annually:
  - Employee Training
  - Annual Facility Assessment
  - Review SWPPP
  - Elected officials update
  - Program Review
  - Annual Report
-  Permit Term:
  - Outfall Inspections (in conjunction with MCM3)
  - MS4-owned post-construction structural BMP inspections
-  Ongoing:
  - Maintenance
  - Surface Visual Inspections

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[www.wesslerengineering.com](http://www.wesslerengineering.com)