

**Michigan Municipal Separate Storm Sewer System (MS4) Permit
Developing a Storm Water Pollution Prevention Initiative Under the Watershed General Permit**

The purpose of the Storm Water Pollution Prevention Initiative (SWPPI) is to detail the specific actions the permittee has determined will be implemented, over the term of the permit, to meet the requirements of the Watershed General Permit. Since many of the Watershed Management Plan (WMP) actions will help to fulfill the SWPPI requirements, the permittee is encouraged to draw upon applicable WMP actions to help determine the specific actions that will be included in the SWPPI. At a minimum, the SWPPI shall be designed to reduce the discharge of pollutants to the maximum extent practicable (MEP), include actions to address the standard requirements identified in Part I.A.4.b., pages 9-20, of the permit, and provide a detailed schedule for implementing the actions committed to in the SWPPI. As required by the permit, the implementation schedule shall identify the years and frequency (as applicable) that the actions will be implemented. Further, permittees shall implement all of the actions (i.e., put into action, operation, service, or practice) over the term of this permit, unless the permittee has a shortened permit term and the Department of Natural Resources and Environment (Department) agrees to another schedule (Part I.A.4.b.8., page 20).

In addition, for the convenience of a single implementation document, a permittee may wish to incorporate all of the WMP actions into the SWPPI, including WMP actions that are not necessary to meet the requirements of the Watershed General Permit. Presently, compliance actions included in a MS4 storm water program are ineligible for some federal grant funds. For actions that go above and beyond permit requirements, the permittee may consider including these as voluntary or “wish-list” items. This may allow opportunities for pursuing grant funds in the future for those actions. If these additional WMP actions are not clearly marked as voluntary or “wish list” and placed in an appendix to the SWPPI, then these additional actions will be considered enforceable SWPPI actions. The Public Education Plan (PEP) and Illicit Discharge Elimination Plan (IDEP) are now a part of or rolled into the SWPPI. Options for submittal include, attaching them as appendices to the SWPPI, including them as separate chapters within the SWPPI, or integrating their respective actions into the SWPPI or SWPPI table.

Permittees must submit a hard or electronic copy of the SWPPI to the appropriate district office by the date specified in the certificate of coverage (COC). If an electronic copy of the SWPPI is submitted the document must be signed and submitted by the permittee in PDF format. At the time of submittal, a SWPPI will be considered complete and approved if the SWPPI meets the specific requirements of the permit (Part I.A.4.b., pages 9-20) and does not include any alternative options. In addition, the permittee is required to begin implementation of their SWPPI upon submittal.

**Standard SWPPI Requirements
(Part I.A.4.b., page 9 - 20)**

1. Alternative Approach
 - Part I.A.4.a.2), page 8
2. Scope of SWPPI
 - Part I.A.4.b., page 9
3. Reopener
 - Part I.A.4.a.3), page 9
4. Prioritized total maximum daily load(s) actions and monitoring (as applicable)
 - Part I.A.4.b.1), page 9
5. Public education actions
 - Part I.A.4.b.2), page 10
6. Illicit discharge elimination actions
 - Part I.A.4.b.3), page 12
7. Post-construction controls
 - Part I.A.4.b.4), page 15
8. Construction storm water runoff controls
 - Part I.A.4.b.5), page 17
9. Pollution prevention and good housekeeping actions
 - Part I.A.4.b.6), page 17
10. Methods for assessing the effectiveness of SWPPI actions
 - Part I.A.4.b.7), page 20
11. Implementation schedule for SWPPI actions
 - Part I.A.4.b.8), page 20
12. Actions for urbanized areas with deferred WMPs (as applicable)



If a permittee opts to pursue an alternative approach, then the permittee will be required to submit the proposed alternative approach to the Department for approval. It is recommended that permittees include the requests for alternative approaches in a SWPPI cover letter. The proposed alternative approach will be due by the SWPPI submittal date and must include detailed information about the specifics of the alternative approach(es) and clearly identify the standard SWPPI requirement (i.e., Total Daily Maximum Loads (TMDL), PEP, IDEP, etc.) for which the permittee is requesting the alternative.

Upon submitting a SWPPI that utilizes alternative approaches, permittees will be required to begin implementation of all portions of the SWPPI (i.e., TMDL, PEP, IDEP, etc.) that were designed to meet the specific requirements identified in the permit. For alternative approaches, permittees shall begin implementation of the alternative upon approval by the Department.

If, at anytime, the SWPPI is determined to be deficient in meeting the permit requirements the Department may notify the permittee and request that the SWPPI be revised to address the deficiencies identified by the Department. In the event that a SWPPI is determined to be deficient, the permittee will be given 90 days to address the specific concerns, unless a longer timeframe is agreed to by the Department (Part I.A.4.a.3., page 9).

SWPPI Formatting

Permittees are encouraged to organize and format their SWPPI in the simplest means possible so that it is functional and facilitates the implementation and tracking of their actions. One way this can be accomplished is by formatting the SWPPI into chapters with corresponding text and tables. This method may help to clearly link actions to the corresponding SWPPI requirement(s) (i.e., TMDL, PEP, IDEP, etc.).

Another option is to format the SWPPI into a single-action table containing actions to address all of the standard SWPPI requirements (i.e., TMDL, PEP, IDEP, etc.). This method may prove to be more or less cumbersome depending on permittee circumstances and operations. Further, permittees should be aware that PEP and IDEP actions are not required to be included in a single-implementation table; however, the PEP and IDEP shall be submitted as part of the SWPPI.

In addition, permittees may choose to create a summary action table, at the end (or beginning) of the overall SWPPI, to help track the implementation status of the permittees actions. Because many actions cross multiple permit requirements a summary table could list each action once in order to help simplify the implementation and tracking of SWPPI actions. An example summary table is provided below.

No matter how a permittee decides to format their SWPPI, it is important for permittees to format their SWPPI in a manner that is appropriate for their operation, and best conveys information to the Department regarding the actions that will be implemented to comply with the permit.

Alternative Approaches and Elective Options

The Watershed General Permit offers different options for permit holders. Alternative approaches are allowed for any of the SWPPI requirements. The alternative approaches shall be approved by the Department.

An elective option can be found in the IDEP, TMDL, and Post-Construction Runoff Control parts of the Watershed General Permit. The elective option does not need Department approval, but coordination with the Department is encouraged.

Example Summary Table

Actions	Description/Method of Implementation	Permit Requirements Addressed						Schedule	Method of Evaluating Effectiveness
		TMDL	PEP	IDEP	Post-construction	Construction	P2 / Good housekeeping		

Actions= Name of action permittee is undertaking to meet permit requirements.

Description/Method of Implementation = A description of how the action will be implemented.

Permit Requirements Addressed= Check the applicable permit requirements covered by the action.

Schedule= Include the timing of implementing the action.

Method of evaluating effectiveness = Include the method to evaluate the effectiveness for each action. If watershed-wide effectiveness is being utilized for one or all of the requirements, please note that in the SWPPI.

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