

**Guidance for developing the  
Stormwater Management Program (SWMP) under  
AZPDES General Permit (AZG2002-002)  
for Small Municipal Separate Storm Sewer Systems (MS4s)**

A SWMP describes what a permittee will do to reduce the discharge of pollutants into receiving waters of the MS4. The Small MS4 General Permit requires permittees to develop, implement and enforce best management practices (BMPs) for the six minimum control measures, and remains flexible as to what BMPs the permittee could apply. While ADEQ does not currently require any particular BMPs, ADEQ would like to make sure that the components of a SWMP are properly stated. ADEQ's objective in providing this guidance document is to reduce the amount of time permittees spend on preparation of the SWMP and to save state resources during the review period. To this end, ADEQ makes the following recommendations:

**A. SWMP COMPONENTS**

1. The permittee must specify at least one BMP for each of requirements. There is no limit on the number of BMPs you can use to fully implement the requirement. You must use as many BMPs as you need to meet the control measure requirement.
2. A BMP should contain an action verb such as "enforce," "install," "display," "meet," etc. Be specific. Do not use "prepare" as an action verb in your BMP. Preparation of materials or information ought to be a beginning step in a series of steps that will lead to your BMP and ultimately to the fulfillment of the applicable requirement. Therefore, if you plan to prepare any materials or information, you should include this information as part of your measurable goals.
3. A BMP should contain a specific medium, material or tool to be used to complete the action. Be specific about what you expect this tool to accomplish.
4. A BMP should contain a descriptive phrase saying how/in what manner/to what extent the medium, material or tool will be applied. Some examples:
  - "Enforce town ordinance #5"
  - "Install oil/water separators at 70% of all municipal equipment yards"
  - "Display contact's name and phone number on the town website."
5. For each BMP that is not an existing BMP, there must be at least one measurable goal.
6. For each measurable goal there must be an associated date of commencement and date of completion.
7. If you are providing multiple scenarios for measurable goals, indicate that you will do one OR the other. In any event, you will be responsible for following through with the BMP. When ADEQ reviews your annual report, ADEQ should be able to identify (based on your description) which scenario you chose.

8. Describe any municipality-specific terminology in your SWMP. For example, if your municipality has abbreviations for departments, please indicate the full name of the department in the SWMP. Also, if your SWMP references any municipality-specific tools or protocols, please explain these in the SWMP. For example, if your municipality plans to use “City Scape” as a means of disseminating stormwater information to the public, please indicate what “City Scape” is in the SWMP by noting: City Scape is a 30 minute program aired on local channel 15 that is devoted to sharing information about city programs.

## **B. SWMP FORMAT**

ADEQ recommends that you use the following format to describe how you will address the specific requirements of your SWMP. For additional examples of appropriate format, please see the Small MS4 Model SWMP tables labeled “BMPs and Measurable Goals.” You are not required to use these formats, however, the format you choose must describe your SWMP to equivalent detail.

<b>Permit Requirement Citation</b>	<b>BMP</b>	<b>Measurable goals</b>	<b>Start Date</b>	<b>Implementation Date</b>
V.B.4.c.	Staff will review grading plans for stormwater pollution prevention measures	Identify which department in the town should review plans	March 2004	June 2004
		Train staff on how to determine if BMPs on a construction site are appropriate	June 2004	Initial training complete June 2005, refresher training will be provided on an annual basis
		Make policy on how to prioritize construction sites for review	September 2004	December 2004

## **C. NARRATIVE DESCRIPTIONS WITHIN THE SWMP**

The requirement to “Include the following information in the SWMP,” which is part of each minimum control measure - will typically ask for more information than would be contained in the above table. The subparts of this requirement must be explained by a narrative description, except in cases where another format is indicated such as a list or a map. In some cases, it will be redundant to provide the “following information.” Therefore, it is acceptable to include references to other parts of the SWMP. However, if these references don’t explain the program well enough, ADEQ will need more information and permit coverage for the permittee may be delayed. Be sure to be specific and clear with respect to the subpart you are answering. Every

subpart of “Include the following information in the SWMP” must be addressed with a separate narrative description.

For an example of how you should format the “Include the following information in the SWMP” subparts, reference the Small MS4 Model SWMP tables labeled “Additional Information.” There is one table for each minimum control measure. Please see Table 4.2 and Attachment #2 for an example. ADEQ does not assume that the methods given as examples will reduce pollutants to the maximum extent practicable (MEP).

#### **D. CONCLUSION**

The BMPs a permittee chooses to implement become, in practice, the permittee’s permit conditions. Therefore, ADEQ recommends that permittees use realistic BMPs in their efforts to comply with this permit by reducing pollutants to and from the MS4 to the MEP.