

SECTION 8

USEPA STORMWATER PHASE II RULE
CONSTRUCTION SITE RUNOFF CONTROL
MINIMUM CONTROL MEASURES
2023

Construction Site Runoff Control Minimum Control Measure



[Photo](#) by U.S. EPA

This fact sheet profiles the Construction Site Runoff Control minimum control measure, one of six program areas an operator of a Phase II-regulated small municipal separate storm sewer system (MS4) is required to address as part of its National Pollutant Discharge Elimination System (NPDES) stormwater permit. This fact sheet offers some general considerations on strategies used by MS4s to implement construction site stormwater runoff control programs. It is important to keep in mind that the regulated small MS4 operator typically has flexibility in choosing exactly how to satisfy the construction requirements in its NPDES permit.

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Why Is the Control of Construction Site Runoff Necessary?

Polluted stormwater runoff from construction sites often flows to MS4s and ultimately is discharged into local rivers and streams. Of the pollutants listed in Table 1, sediment is usually the main pollutant of concern. According to the 2017 National Water Quality Inventory, states and tribes report that sedimentation is a top cause of pollution associated with impairment in assessed rivers and streams, second only to pathogens (bacteria). Sedimentation impairs 84,503 river and stream miles (12% of the assessed river and stream miles and 31% of the impaired river and stream miles). Sources of sedimentation include agriculture, urban runoff, construction, and forestry.

Table 1. Pollutants Commonly Discharged from Construction Sites

Sediment
Solid and sanitary wastes
Phosphorus (fertilizer)
Nitrogen (fertilizer)
Pesticides
Oil and grease
Concrete truck washout
Construction chemicals
Construction debris

Sediment runoff rates from construction sites, however, are typically 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades. The resulting siltation, and the contribution of other pollutants from construction sites, can cause physical, chemical, and biological harm to our nation's waters. For example, excess sediment can quickly fill rivers and lakes, requiring dredging and destroying aquatic habitats.

What Is Required?

The Phase II regulations require permitted small MS4s to develop, implement, and enforce a program to reduce pollutants in stormwater runoff to their MS4 from construction activities that result in a land disturbance of greater than or equal to one acre, or the disturbance is less than one acre but is part of a larger common plan of development or sale. NPDES permits will also require, at a minimum, that the small MS4:

- Develop an ordinance or other regulatory mechanism to require erosion and sediment controls, and sanctions to ensure compliance, to the extent allowable under state, tribal, or local law.
- Require construction site operators to implement and maintain specific erosion and sediment control best management practices (BMPs).
- Require construction site operators to control wastes 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.
- Implement procedures for: site plan review of construction plans that consider potential water quality impacts; site inspection and enforcement of control measures; and the receipt and consideration of information submitted by the public.

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Each permit specifies the minimum elements that must be included in each MS4's construction runoff program. These elements will differ from state to state.

EPA has compiled several examples from federal and state MS4 permits that address the construction runoff control measure. These examples are included in a permit compendium available on the EPA's stormwater website. See particularly Section D (Construction Site Runoff) in the EPA's [Compendium of MS4 Permitting Approaches – Part 1: Six Minimum Control Measures](#).

Considerations in Developing and Implementing This Measure

Additional explanation and considerations for several of the required components of the regulated small MS4's construction program are provided below.

Site Plan Review

The small MS4 operator must include in its construction program requirements for the implementation of appropriate BMPs on construction sites to control erosion and sediment and other waste at the site. Each small MS4 operator must also develop and implement procedures for conducting reviews of construction site plans. To ensure compliance with these requirements, EPA recommends that the small MS4 operator review the site plans submitted by the construction site operator before ground is broken.

Site plan review aids in compliance and enforcement efforts since it alerts the small MS4 operator early in the process to the planned use or non-use of proper BMPs and provides a way to track new construction activities. The tracking of sites is useful not only for the small MS4 operator's recordkeeping and reporting purposes, which are required under their NPDES stormwater permit (see Fact Sheet 2.9), but also for members of the public interested in ensuring that the sites are in compliance.

Inspections and Penalties

To ensure that the BMPs are properly designed, installed, and implemented, the small MS4 operator is required to develop procedures for site inspection and enforcement of control measures to deter infractions. Procedures could include steps to identify priority sites for inspection and enforcement based on the nature and extent of the construction activity, topography, and the characteristics of soils and receiving water quality. Inspections give the MS4 operator an opportunity to provide additional guidance and education, issue warnings, or assess penalties.

To conserve staff resources, one possible option for small MS4 operators is to consider using the same inspection staff that is used for other types of inspections at the same construction site, such as those related to health and safety building codes.

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In early 2002, EPA's Office of Compliance established a national workgroup to address issues related to the construction industry. The workgroup has developed a construction industry compliance assistance website (www.cicacenter.org) as a tool for builders and developers. Inspectors can use the website to find plain language explanations of the major environmental laws affecting the construction industry as well as guidance that can be distributed to developers and construction site operators.

Additionally, in 2022, EPA published a [web-based training program](#) for conducting construction inspections under the Agency's Construction General Permit (CGP). The training program, which is available in both English and Spanish, provides an overview of basic erosion and sediment control, and pollution prevention, principles and practices, and reviews procedures for conducting and documenting site inspections. The course also includes two 360-degree virtual inspections that show how to spot problems at construction sites during the inspection.

Information Submitted by the Public

The small MS4 operator is also required to develop procedures for the receipt and consideration of public inquiries, concerns, and information submitted regarding local construction activities. This provision is intended to further reinforce the public participation component of the regulated small MS4 stormwater program (see Fact Sheet 2.4) and to recognize the crucial role that the public can play in identifying instances of noncompliance.

The small MS4 operator is required only to *consider* the information submitted and may not need to follow-up and respond to every complaint or concern. Although some form of enforcement action or reply is not required, the small MS4 operator is required to demonstrate acknowledgment and consideration of the information submitted. A simple tracking process in which submitted public information, both written and verbal, is recorded and then given to the construction site inspector for possible follow-up may be sufficient in many cases depending on what the MS4 permit requires.

Are Construction Sites Covered Under the NPDES Stormwater Program?

Yes. The Phase II regulations require NPDES permit coverage for stormwater discharges from construction sites that disturb one or more acres of land, including smaller sites that are part of a larger common plan of development or sale (see Fact Sheet 3.0 for information on the Phase II construction program). These permits are required for construction stormwater that is discharged directly to receiving waters or that is first directed to an MS4 prior to discharge. Most states are authorized to implement the NPDES stormwater program and have issued state-specific construction general permits. EPA remains the permitting authority in a few states, territories, and on most land in Indian Country, however. For construction activities in areas where EPA is the permitting authority, construction site operators have the option of obtaining permit coverage under EPA's [Construction General Permit \(CGP\)](#). Areas that are eligible for permit coverage under the CGP are listed in [Appendix B](#) of the CGP. CGP requirements include, among other things, the submission of a Notice of Intent, compliance

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with sediment, erosion control, and pollution prevention requirements, and the development of a stormwater pollution prevention plan (SWPPP) that describes how the site will comply with the CGP.

To enable operators of regulated small MS4s to more effectively control construction site discharges into their MS4s, the Phase II regulations require MS4s to comply with their own set of NPDES permit requirements related to construction site runoff. These requirements, summarized in this fact sheet, apply to the MS4, whereas construction stormwater permits issued and administered by a state or EPA apply directly to construction site operators.

To aid operators of regulated construction sites in their efforts to comply with both local requirements and their own NPDES permit, the Phase II regulations also include a provision that allows the operator to meet its NPDES permit conditions through compliance with their local erosion and sediment control requirements if authorized by the permitting authority. This means that if a construction site is located in an area covered by requirements that are considered by the NPDES permitting authority to constitute a “qualifying state, tribal or local program” then the construction site operator’s compliance with the local program constitutes compliance with their NPDES permit. The ability to reference other programs in the NPDES permit is intended to reduce confusion between overlapping and similar local and NPDES permitting authority requirements, while still providing for both local and national regulatory coverage of the construction site. The provision allowing NPDES permitting authorities to reference other programs has no impact on, or direct relation to, the small MS4 operator’s responsibilities under the construction site runoff control minimum measure profiled here.

Is a Small MS4 Required to Establish Local Requirements for Construction Sites that the Permitting Authority has Waived from the NPDES Construction Program?

No. Under the Phase II regulations at 40 CFR § 122.26(b)(15)(i), NPDES permitting authorities may waive the need for otherwise eligible construction activities to obtain NPDES permit coverage if either (A) the rainfall erosivity of the construction site is below a defined level (i.e., below a factor of 5), or (B) stormwater controls are not needed based on an approved or established TMDL or equivalent analysis. If the permitting authority waives requirements for a small construction site, the small MS4 operator’s construction runoff program does not apply to that site.

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For Additional Information

Contacts

A list of contacts for the U.S. EPA's Office of Wastewater Management (Headquarters), each EPA regional office, and state office is located at <https://www.epa.gov/npdes/contact-us-stormwater>

Your NPDES Permitting Authority

Most states and territories are authorized to administer the NPDES Program, except the following, for which EPA is the permitting authority:

- American Samoa
- District of Columbia
- Guam
- Johnston Atoll
- Massachusetts
- Midway and Wake Islands
- New Hampshire
- New Mexico
- Northern Mariana Islands
- Puerto Rico
- Most Indian country lands

Reference Documents

- [EPA's Stormwater Website](#)
- [Stormwater Phase II Final Rule \(64 FR 68722\)](#)
- [Final MS4 General Permit Remand Rule \(81 FR 89320\)](#)
- [Final Small MS4 Urbanized Area Clarification \(88 FR 37994\)](#)
- [Phase II Final Rule Fact Sheet Series](#)
- [National Menu of Best Management Practices for Stormwater Phase II](#)
- [MS4 Permits – Compendium of Clear, Specific, and Measurable Permitting Examples](#)
- [Construction Industry Compliance Assistance Center](#)
- [EPA's Construction General Permit](#)

Disclaimer: This information is guidance only and does not establish or affect legal rights or obligations. Agency decisions in any particular case will be made by applying the law and regulations to the specific facts of the case.

SECTION 9

COMPLIANCE SCHEDULE FOR MS4 MINIMUM CONTROL MEASURES (UPDATED 2023)

**Compliance Schedule for
MS4 Minimum Control Measures
City of Monessen, Westmoreland County
September 30, 2023**

Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
Create a separate file for all MS4 related documents		01/31/16	12/08/15	On Going
Submit Annual Report 2016		06/30/16	02/10/16	06/30/16
Submit Pollution Reduction Plan		09/30/17	07/27/17	09/14/17
PAG-13 General Permit Approval				03/19/18
Submit Annual Report 2018		09/30/18	07/01/18	09/28/18
Submit Annual Report 2019		09/30/19	08/01/19	09/27/19
Submit Annual Report 2020		09/30/20	07/30/20	09/28/20
Submit Annual Report 2021		09/30/21	06/22/21	09/27/21
Submit Annual Report 2022		09/30/22	06/23/22	09/26/22
General Permit Expires 03-31-23. However, coverage under the GP does not expire unless revoked by DEP		03/31/23	08/30/23	12/15/23
MCM #1	Public Education and Outreach Program (PEOP)			
BMP #1	Develop and implement a written PEOP			
	a. Develop and implement initial written PEOP 2016	03/31/16		
	b. Yearly re-evaluation and update of the PEOP 2017	03/31/17		
	c. Develop and implement initial written PEOP 2016, yearly re-evaluation and update of the PEOP 2017	03/31/18	06/01/18	06/29/18
	d. Yearly re-evaluation and update of the PEOP 2019	03/31/19	05/30/19	06/29/19
	e. Yearly re-evaluation and update of the PEOP 2020	03/31/20	06/15/20	06/29/20
	f. Yearly re-evaluation and update of the PEOP 2021	03/31/21	06/17/21	06/22/21
	g. Yearly re-evaluation and update of the PEOP 2022	03/31/22	04/12/22	04/12/22
	h. Yearly re-evaluation and update of the PEOP 2023	03/31/23	03/31/23	03/31/23
BMP #2.	Develop lists of target audience groups present within the area served by the regulated small MS4s			
	a. Develop initial list of target audience groups present within the area served by the regulated MS4's 2016	03/31/16	02/04/16	06/30/16
	b. Yearly re-evaluation and update of the target audience groups 2017	03/31/17		
	c. Yearly re-evaluation and update of the target audience groups 2018	03/31/18	06/01/18	06/29/18
	d. Yearly re-evaluation and update of the target audience groups 2019	03/31/19	06/01/19	06/15/19
	e. Yearly re-evaluation and update of the target audience groups 2020	03/31/20	06/15/20	06/30/20
	f. Yearly re-evaluation and update of the target audience groups 2021	03/31/21	06/22/21	06/22/21

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MS4 Minimum Control Measures
City of Monessen, Westmoreland County
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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	g. Yearly re-evaluation and update of the target audience groups 2022	03/31/22	04/19/22	04/19/22
	h. Yearly re-evaluation and update of the target audience groups 2023	03/31/23	03/31/23	03/31/23
BMP #3.	Publish stormwater education materials	01/31/16	02/04/16	
	a. Publish stormwater education materials 2016	01/31/16	02/04/16	04/08/16
	a1. Downloaded MS4 fact sheets from SPC		02/04/16	02/04/16
	a2. Sent MS4 fact sheets to City for website		03/25/16	03/25/16
	a3. MS4 fact sheets posted to City website		03/28/16	04/08/16
	b. Review and update published materials 2017	01/31/17	12/08/16	02/03/17
	b1. Downloaded stormwater education material from SPC		12/08/16	01/19/17
	b2. Delivered stormwater education material to City for website		01/24/17	01/24/17
	b3. Stormwater education material posted to City website		01/25/17	Not Posted
	b4. Stormwater education material report delivered to City		02/02/17	02/03/17
	c. Review and update published materials 2018	01/31/18	03/26/18	03/28/18
	c1. Delivered stormwater education material to City for website		03/28/18	03/28/18
	c2. Stormwater education material posted to City website, information provided to City 03/28/18		03/28/18	03/31/21
	d. Review and update published materials 2019 include summary of stormwater management activities	01/31/19	05/30/19	03/31/21
	d1. Delivered stormwater education material to City for website			03/31/21
	d2. Stormwater education material posted to City website, information provided to City 03/28/18			03/31/21
	e. Review and update published materials 2020 include summary of stormwater management activities, information provided to City 08/19/20	01/31/20	03/30/20	03/31/21
	f. Review and update published materials 2021 include summary of stormwater management activities	01/31/21		03/31/21
	g. Review and update published materials 2022 include summary of stormwater management activities	01/31/22	06/30/22	06/30/22
	h. Review and update published materials 2023 include summary of stormwater management activities	01/31/23	05/30/23	05/30/23
BMP #4.	Two methods of distributing educational materials to the target audience each year			
	a. Distribute education material method 1 - 2016	01/31/16	02/04/16	02/04/16

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MS4 Minimum Control Measures
City of Monessen, Westmoreland County
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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	a1. Provided City with copies of Homeowner's Guide to Stormwater booklets for placement in the City Hall lobby and Monessen Library		02/04/16	02/04/16
	b. Distribute education material method 2 - 2016	07/15/16		
	c. Distribute education material method 1 - 2017	01/15/17		
	c.1 Delivered stormwater education material to City for website		01/24/17	01/24/17
	c.2 Stormwater education material posted to City website		01/25/17	Not Posted
	d. Distribute education material method 2 - 2017	07/15/17		
	e. Distribute education material method 1 - 2018	01/15/18	03/28/18	
	e1. Provided City with copies of MS4 Stormwater Management Program reference manuals for placement in City Hall, the Monessen Public Library, and the Monessen High School Library.		03/28/18	03/28/18
	e.2 City to distribute MS4 Stormwater Management Program reference manual to the Monessen Public Library and the Monessen High School Library		03/29/18	06/30/19
	f. Distribute education material method 2 - 2018	07/15/18	03/28/18	
	f.1 Provided City with digital copy of MS4 Stormwater Management Program reference manuals for placement on the City's Website.		03/28/18	03/28/18
	f.2 City to post MS4 Stormwater Management Program reference manual on the City's Website.		03/29/18	03/31/21
	g. Distribute education material method 1 - 2019	01/15/19		03/31/21
	h. Distribute education material method 2 - 2019	07/15/19		
MCM #2	Public Involvement / Participation Plan (PIPP)			
BMP #1.	Develop and implement a written PIPP			
	a. Develop and implement initial written PIPP 2016	03/01/16		
	b. Yearly re-evaluation and update of the PIPP 2017	03/01/17		
	c. Develop and implement initial written PIPP 2016, yearly re-evaluation and update of the PIPP 2018,	03/01/18	06/01/18	06/29/18
	c.1 Post downloadable copy of the MS4 Program Plan on the City's website	11/30/18		03/31/21
	c.2 Post downloadable copy of the MS4 Annual Report on the City's website	11/30/18		03/31/21
	d. Yearly re-evaluation and update of the PIPP 2019	03/01/19	05/30/19	06/30/19
	e. Yearly re-evaluation and update of the PIPP 2020	03/01/20	03/30/20	06/30/20
	f. Yearly re-evaluation and update of the PIPP 2021	03/01/21	06/22/21	06/22/21
	g. Yearly re-evaluation and update of the PIPP 2022	03/01/22	04/19/22	04/19/22

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MS4 Minimum Control Measures
City of Monessen, Westmoreland County
September 30, 2023**

Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	h. Yearly re-evaluation and update of the PIPP 2023	03/01/23	05/30/23	05/30/23
BMP #2.	Public notice prior to adoption of any Ordinance required by the Permit	11/23/16	10/26/16	11/23/16
	a. IDD&E Ordinance		10/26/15	04/21/16
	a.1 Council Work Session for initial IDD&E Ordinance		10/26/15	10/26/15
	a.2 Council Regular Meeting for initial IDD&E Ordinance		11/23/15	11/23/15
	a.3 Council Work Session for revised IDD&E Ordinance		03/21/16	03/21/16
	a.4 First reading of Ordinance at Council Meeting		03/28/16	03/28/16
	a.5 Advertised in the Valley Independent Newspaper		04/04/16	04/04/16
	a.6 Conduct Public Hearing	04/18/16	04/21/16	04/21/16
	a.7 Adopted revised IDD&E Ordinance at Council Meeting	04/18/16	04/21/16	04/21/16
	a.8 Sent copy of adopted IDD&E Ordinance to DEP		04/25/16	04/25/16
	b. Operations and Maintenance Ordinance		10/26/15	04/21/16
	b.1 Council Work Session for initial O&M Ordinance		10/26/15	10/26/15
	b.2 Council Regular Meeting for initial O&M Ordinance		11/23/15	11/23/15
	b.3 Council Work Session for revised O&M Ordinance		03/21/16	03/21/16
	b.4 First reading of O&M Ordinance at Council Meeting		03/28/16	03/28/16
	b.5 Advertised in the Valley Independent Newspaper		04/04/16	04/04/16
	b.6 Conduct Public Hearing for O&M Ordinance	04/18/16	04/21/16	04/21/16
	b.7 Adopted revised O&M Ordinance at Council Meeting	04/18/16	04/21/16	04/21/16
	b.8 Sent copy of adopted O&M Ordinance to DEP		04/25/16	04/25/16
	c. Stormwater Management Ordinance			11/21/17
	c.1 First reading of O&M Ordinance at Council Meeting		10/31/17	10/31/17
	c.2 Advertised in the Valley Independent Newspaper		10/31/17	Unsure of Date
	c.3 Conduct Public Hearing for O&M Ordinance	04/18/16	11/28/17	11/28/17
	c.4 Adopted revised O&M Ordinance at Council Meeting	04/18/16	11/28/17	11/28/17
	d. Amend Existing SWM Ordinance or Adopt Westmoreland County Model SWM Ordinance			
	d.1 Review Westmoreland County Model Stormwater Management Ordinance amend the existing SWM Ordinance or accept the County's model SWM Ordinance	05/01/19	08/01/20	Ordinance in Draft Form as of 9/15/20
	d.2 First reading of revised SWM Ordinance at Council Meeting			
	d.3 Advertise in the Valley Independent Newspaper			
	d.4 Conduct Public Hearing for revised SWM Ordinance			
	d.5 Adopted revise SWM Ordinance at Council Meeting		09/14/21	09/14/21

**Compliance Schedule for
MS4 Minimum Control Measures
City of Monessen, Westmoreland County
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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
BMP #3.	At least one public meeting per year			
	a. Yearly public meeting 2016	05/01/16	02/10/16	04/21/18
	b. Yearly public meeting 2017	05/01/17		
	c. Yearly public meeting 2018	05/01/18	03/28/18	03/28/18
	d. Yearly public meeting 2019	05/01/19		
	e. Yearly public meeting 2020	05/01/20	09/14/20	09/14/20
	f. Yearly public meeting 2021	05/01/21		
	g. Yearly public meeting 2022	05/01/22		
	h. Yearly public meeting 2023	05/01/23		
MCM #3	Illicit Discharge Detection and Elimination (IDD&E)			
BMP #1.	Develop and implement a written IDD&E Program			
	a. Develop and implement initial written IDD&E Program 2016	09/30/16		
	b. Yearly re-evaluation and update of the IDD&E Program 2017	09/30/17		
	c. Develop and implement initial written IDD&E Program 2016, yearly re-evaluation and update of the IDD&E Program 2018	09/30/18	06/01/18	06/29/18
	d. Yearly re-evaluation and update of the IDD&E Program 2019	06/30/19	06/15/19	06/29/19
	e. Yearly re-evaluation and update of the IDD&E Program 2020	06/30/20	06/15/20	06/30/20
	f. Yearly re-evaluation and update of the IDD&E Program 2021	06/30/21	06/17/21	06/22/21
	g. Yearly re-evaluation and update of the IDD&E Program 2022	06/30/22	06/16/22	06/23/22
	h. Yearly re-evaluation and update of the IDD&E Program 2023	06/30/23	06/07/23	06/07/23
BMP #2.	Develop MS4 storm system map and update yearly			07/10/10
	a. Yearly MS4 storm system map update for year 2015	01/31/16	01/22/16	03/25/16
	b. Yearly MS4 storm system map update for year 2016	01/31/17	07/31/17	09/18/17
	c. Yearly MS4 storm system map update for year 2017	01/31/18	04/26/18	04/30/18
	d. Yearly MS4 storm system map update for year 2018	01/31/19	07/24/18	09/06/18
	e. Yearly MS4 storm system map update for year 2019	01/31/20	05/30/19	06/15/19
	f. Yearly MS4 storm system map update for year 2020	01/31/21	05/30/20	06/15/20
	g. Yearly MS4 storm system map update for year 2021	01/31/22	06/28/21	06/28/21
	h. Yearly MS4 storm system map update for year 2022	01/31/23	06/16/22	06/23/22
	i. Yearly MS4 storm system map update for year 2023	01/31/23	06/07/23	06/30/23
BMP #3.	Develop map of entire City wide storm sewer system and update yearly			07/10/10
	a. Yearly City wide storm system map update for year 2015	01/31/16	01/22/16	03/25/16
	b. Yearly City wide storm system map update for year 2016	01/31/17	07/31/17	09/18/17
	c. Yearly City wide storm system map update for year 2017	01/31/18	04/26/18	04/30/18
	d. Yearly City wide storm system map update for year 2018	01/31/19	07/24/18	09/06/18
	e. Yearly City wide storm system map update for year 2019	01/31/20	05/30/19	06/15/19
	f. Yearly City wide storm system map update for year 2020	01/31/21	05/30/20	06/15/20
	g. Yearly City wide storm system map update for year 2021	01/31/22	06/17/21	06/22/21

**Compliance Schedule for
MS4 Minimum Control Measures
City of Monessen, Westmoreland County
September 30, 2023**

Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	h. Yearly City wide storm system map update for year 2022	01/31/23	06/16/22	06/23/22
	i. Yearly City wide storm system map update for year 2023	01/31/23	06/07/23	06/30/23
BMP #4.	Outfall Screening and Illicit Discharge Tracking System			
	Outfall Screening 2012		08/15/12	08/15/12
a.	Outfall Screening 2016	06/30/16	10/10/16	12/08/16
a.1	Outfall Screening Monongahelia River		10/10/16	10/10/16
a.2	Outfall Screening Report		10/11/16	12/08/16
b.	Outfall Screening 2017	04/15/17	07/31/17	Partial
b.1	Outfall Screening Monongahelia River	04/15/17		
b.2	Walk UNT #1 to Monongahelia River - Grand Boulevard	08/01/17	07/31/17	07/31/17
b.3	Walk UNT #2 to Monongahelia River - Tyrol Boulevard	08/01/17	07/31/17	07/31/17
b.4	Walk UNT to Speers Run - State Road/High School	08/01/17	07/31/17	07/31/17
b.5	Outfall Screening Report	09/01/17	08/01/17	09/14/17
c	Outfall Screening 2018	04/15/18	04/26/18	09/10/18
c.1	Outfall Screening Monongahelia River	04/15/18	08/28/18	08/28/18
c.2	Walk UNT #1 to Monongahelia River - Grand Boulevard	08/01/18	04/26/18	04/26/18
	Stabilized UNT #1 in City Park		05/21/18	06/01/18
c.3	Walk UNT #2 to Monongahelia River - Tyrol Boulevard	08/01/18	04/26/18	04/26/18
c.4	Walk UNT to Speers Run - State Road/High School	08/01/18	07/24/18	07/24/18
c.5	Outfall Screening Report	05/31/18	08/29/18	09/10/18
d.	Outfall Screening 2019	04/15/19		
d.1	Outfall Screening Monongahelia River	04/15/19		Did not screen
d.2	Walk UNT #1 to Monongahelia River - Grand Boulevard	08/01/19	08/27/19	08/30/19
d.3	Walk UNT #2 to Monongahelia River - Tyrol Boulevard	08/01/19	08/27/19	08/30/19
d.4	Walk UNT to Speers Run - State Road/High School	08/01/19	08/27/19	08/30/19
d.5	Outfall Screening Report	09/01/19		
e.	Outfall Screening 2020	04/15/20		
e.1	Outfall Screening Monongahelia River	04/15/20		Did not screen
e.2	Walk UNT #1 to Monongahelia River - Grand Boulevard	08/01/20		Did not screen
e.3	Walk UNT #2 to Monongahelia River - Tyrol Boulevard	08/01/20		Did not screen
e.4	Walk UNT to Speers Run - State Road/High School	08/01/20		Did not screen
e.5	Outfall Screening Report	09/01/20		Did not screen
e.6	Test suspected Illicit Outfalls	11/30/20		Did not screen
f.	Outfall Screening 2021	04/15/21		
f.1	Outfall Screening Monongahelia River	04/15/21		Did not screen
f.2	Walk UNT #1 to Monongahelia River - Grand Boulevard	08/01/21		Did not screen
f.3	Walk UNT #2 to Monongahelia River - Tyrol Boulevard	08/01/21		08/17/21
f.4	Walk UNT to Speers Run - State Road/High School	08/01/21		Did not screen
f.5	Outfall Screening Report	09/01/21		No updates

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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	f.6 Test suspected Illicit Outfalls	12/01/21		No testing performed
	g. Outfall Screening 2022	04/15/22		
	g.1 Outfall Screening Monongahelia River	04/15/22		Did not screen
	g.2 Walk UNT #1 to Monongahelia River - Grand Boulevard	08/01/22		Did not screen
	g.3 Walk UNT #2 to Monongahelia River - Tyrol Boulevard	08/01/22		Did not screen
	g.4 Walk UNT to Speers Run - State Road/High School	08/01/22		Did not screen
	g.5 Outfall Screening Report	09/01/21		No updates
	g.6 Test suspected Illicit Outfalls	12/02/20		No testing performed
BMP #5.	Enact Illicit Discharge Detection and Elimination Ordinance (IDD&E)	12/31/15	08/03/15	04/25/16
	a. Enact Illicit Discharge Detection and Elimination Ordinance	12/31/15	08/03/15	11/23/15
	b. Submit letter certifying enactment of the ordinance	12/31/15	12/08/15	12/08/15
	c. Update Illicit Discharge Detection and Elimination Ordinance		02/02/16	02/12/16
	d. Sent updated IDD&E Ordinance to City		02/12/16	02/12/16
	e. First reading of revised Ordinance at Council Meeting		03/28/16	03/28/16
	f. Advertised in Uniontown Paper		04/04/16	04/04/16
	g. City to conduct Public Hearing		04/21/16	04/21/16
	h. City to adopt revised IDD&E Ordinance		04/21/16	04/21/16
	i. Sent copy of IDD&E Ordinance to DEP		04/25/16	04/25/16
BMP #6.	Educational Outreach about the Program			
	a. Distribute brochures and guidance to target audience	04/30/16		03/31/21
	b. Establish complaint line with message recording	04/30/16	04/30/16	04/30/16
	c. Post the DEP Inspection Report and the 2016 Annual Report on the website			03/31/21
	d. Establish an Environmental Advisory Board	09/15/20		02/10/21
	d.1 Draft Ordinance to Create an Environmental Advisory Board		08/17/20	08/24/20
	d.2 First reading of Ordinance to Create an Environmental Advisory Board	09/14/20	09/14/20	09/14/20
	d.3 Enact Ordinance to Create an Environmental Advisory Board	10/13/20	10/12/20	10/12/20
	e. Stencil storm drains	08/31/16		
	f. Implement recycling programs for common wastes	On going since 2007	On going since 2007	On going since 2007
MCM #4	Construction Site Stormwater Runoff Control	10/31/15	11/23/15	04/13/16

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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	Option MCM #4.A in Section E(4)-(5) of the NOI was checked to satisfy the requirement of MCM #4			
	a. Contact Westmoreland Conservation District (WCD)	10/31/15	11/23/15	11/23/15
	b. Notified that the WCD Board is reviewing revisions to the Standard MOU at their 12-09-15 meeting		11/30/15	11/30/15
	c. Received draft of MOU with the WCD		01/21/16	01/21/16
	d. Met with WCD staff to review draft MOU		02/04/16	02/04/16
	e. Revised draft MOU and sent to City for review		02/16/16	02/17/16
	f. City to comment on revised MOU		02/17/16	02/19/16
	g. Sent proposed MOU revisions to WCD		02/25/16	02/25/16
	h. WCD to respond to proposed MOU revisions		03/15/16	03/15/16
	i. City to discuss at Council's March Work Session		03/21/16	03/21/16
	j. City enacts MOU at Council's Regula Meeting		03/28/16	03/28/16
	k. City sent executed MOU to WCD for enactment		03/31/16	03/31/16
	l. MOU executed with Westmoreland County Conservation District to satisfy the requirements of MCM #4	01/31/16	04/13/16	04/13/16
MCM #5	Construction Site Stormwater Runoff Control			
BMP #1 - 3				
	a. Option MCM #4.A in Section E(4)-(5) of the NOI was checked to satisfy the requirements of BMPs #1 through #3 of MCM #5	01/31/16		No Action Required
BMP #4.	Enact Stormwater Management Ordinance	12/31/15		11/23/15
	a. Enact an Erosion and Sedimentation Control Ordinance that meets the requirements of this permit (Part of SWM Ordinance)			04/21/16
	b. Enact a Stormwater Management Ordinance that meets the requirements of this permit (enacted Operations and Maintenance Ordinance)		12/08/15	04/21/16
	b.1. Enact model Westmoreland County Stormwater Management Ordinance or modify existing SWM Ordinance that meets the requirements of this permit (enacted Operations and Maintenance Ordinance)	08/01/20		09/14/21
BMP #5.	Develop Measures to Encourage and Expand Use of Low Impact Development (LID)	03/31/16		

**Compliance Schedule for
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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	a. Develop inventory of development and redevelopment projects authorized for construction since March 10, 2003 that discharge stormwater to regulated small MS4s that include LID practices	03/31/16		No new development
	b. The Illicit Discharge Detection and Elimination Ordinance adopts the requirements of Pennsylvania Best Management Practices Manual which include LID practices	12/31/15		11/23/15
	c. Repeal sections of Ordinances that conflict with LID practices	03/31/16		No Action Required
BMP #6.	Ensure Adequate Operation & Maintenance of all post construction stormwater management BMPs	05/31/16		
	a. Enact an Operations & Maintenance Ordinance		08/12/15	04/21/16
	a.1 Develop O&M Ordinance		08/12/15	02/19/16
	a.2 Sent O&M Ordinance to City		02/19/16	02/19/16
	a.3 First reading of O&M Ordinance at Council Meeting		03/28/16	03/28/16
	a.4 Advertise O&M Ordinance in Uniontown Paper		04/04/16	04/04/16
	a.5 Hold Public Hearing at Council Meeting	04/21/16	04/21/16	04/21/16
	a.6 Enact O&M Ordinance at Council Meeting	04/21/16	04/21/16	04/21/16
	a.7 Sent copy of enacted O&M Ordinance to DEP		04/25/16	04/25/16
	b. Develop and implement a written inspection program to ensure the stormwater BMPs are properly operated and maintained	05/31/16	06/01/18	06/29/18
	b.1 Review and update inspection program yearly 2017	05/31/17		06/29/18
	b.2 Develop and implement a written inspection program to ensure the stormwater BMPs are properly operated and maintained. Review and update inspection program yearly 2018.	05/31/18	06/01/18	06/29/18
	b.3 Review and update inspection program yearly 2019	05/31/19	06/15/19	06/29/19
	b.4 Review and update inspection program yearly 2020	05/31/20	06/22/20	06/22/20
	b.5 Review and update inspection program yearly 2021	05/31/21	06/28/21	06/28/21
	b.6 Review and update inspection program yearly 2022	05/31/22	06/23/22	06/23/22
	c. Develop inventory of Post Construction Stormwater Management (PCSM) BMPs	05/31/16		None
	c.1 Review and update PCSM BMPs yearly 2017	05/31/17		None
	c.2 Review and update PCSM BMPs yearly 2018	05/31/18		None
	c.3 Review and update PCSM BMPs yearly 2019	05/31/19		None
	c.4 Review and update PCSM BMPs yearly 2020	05/31/20		None

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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	c.5	Review and update PCSM BMPs yearly 2021	05/31/21	None
	c.6	Review and update PCSM BMPs yearly 2022	05/31/22	None
	c.7	Review and update PCSM BMPs yearly 2023	05/31/23	None
MCM #6	Pollution Prevention / Good Housekeeping			
BMP #1.	Identify and document all types of municipal activities and land use that may generate stormwater runoff		07/15/15	07/15/15
	a.	Identify and document all types of municipal activities and land use that may generate stormwater runoff 2016	03/31/16	06/30/16
	b.	Yearly review and update 2017	03/31/17	Non Compliant
	c.	Yearly review and update 2018	03/31/18	06/29/18
	d.	Yearly review and update 2019	03/31/19	06/15/19
	e.	Yearly review and update 2020	03/31/20	06/30/20
	f.	Yearly review and update 2021	03/31/21	06/22/21
	g.	Yearly review and update 2022	03/31/22	04/19/22
	h.	Yearly review and update 2023	03/31/23	06/07/23
BMP #2.	Develop, implement and maintain a written operation and maintenance program for all City operations and facilities that could contribute to discharge to a regulated MS4. Should stress pollution prevention and good housekeeping measures			
	a.	Develop and implement initial written operations and maintenance program 2016	10/31/16	06/29/18
	b.	Yearly review and update 2017	10/31/17	Not Compliant
	c.	Develop and implement initial written operations and maintenance program 2016. Yearly review and update 2018	10/31/18	06/29/18
	d.	Yearly review and update 2019	10/31/19	05/30/19
	e.	Yearly review and update 2020	10/31/20	06/15/20
	f.	Yearly review and update 2021	10/31/21	06/22/21
	g.	Yearly review and update 2022	10/31/22	06/23/22
	h.	Yearly review and update 2023	10/31/23	06/21/23
BMP #3.	Develop and implement an employee training program to further prevent or reduce the discharge of pollutant from City operations to the MS4s		10/31/16	
	a.	Develop and implement initial employee training program	10/31/16	Not Compliant
	b.	Yearly review and update 2017	10/31/17	Not Compliant

**Compliance Schedule for
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Minimum Control Measure	Best Management Practice	Tentative Completion Date	Start Date	Actual Completion Date
	c. Yearly review and update 2018	10/31/18		Not Compliant
	d. Yearly review and update 2019	10/31/19		Not Compliant
	e. Yearly review and update 2020	10/31/20		Not Compliant
	f. Yearly review and update 2021	10/31/21		05/27/21
	g. Yearly review and update 2022	10/31/22		
	h. Develop a Contractor Fact Sheet pertaining to Stormwater Runoff through Construction Sites	01/30/22	04/12/22	06/23/22
	h.1 Add the Contractor Fact Sheet to the webpage	01/30/23		03/31/23