

Table 8 - Implementation Plan Elements and Draft Schedule for Industrial Storm Water

Plan Elements	NPS Category Elements	Target/ Milestone	Completion Dates
1. stakeholders	MDEQ, regulated industries, local government, downstream sites		
2. regulations	Federal CWA industrial storm water regulations requiring NPDES permit coverage for regulated industries		
3. goals	- Permit coverage for all facilities that should have coverage - Full permit compliance for all facilities with permits, especially including full implementation and maintenance of storm water pollution prevention measures		
4a. ongoing efforts	-Regulations in place, many permits in place, many permitted entities with SWPPPs, certified operators, etc. -Existing program for Certification of Stormwater Operators -Ongoing MDEQ compliance and regulatory activities.		
4b. recommendations	-Need better (more) compliance -MDEQ inspections of all permitted facilities in the watershed, and identification of unpermitted facilities that need permits. -Hold certified operators more accountable for actions	- all facilities receive compliance inspections within 3 years - all facilities identified w/o permits will now have them	2004 2004
5. funding resources	Storm water permit fees	-evaluate scope and impact of permit fees and improvements	ongoing
6. program resources	MDEQ staff Local governments to help identify unpermitted industries		ongoing
7. cost optimization	As long as adequate MDEQ staffing...		ongoing
8. data gaps	Need to identify industrial facilities who should have coverage, but do not	ID sources and submit permit applications for all for SW coverage	2001 and ongoing
9. accountability structure	-Permits -TMDL Implementation Committee -Certified Operator reports	Assist where possible with identification of needed permits and tracking of application process	2003 and ongoing

10. reporting	-Ongoing MDEQ compliance tracking/reporting -MDEQ will provide regular updates to TMDL process -On-site Certified Operator reports		2003 and ongoing
11. timeline	Ongoing		ongoing
12. tracking	-MDEQ SW staff will document - number of inspections meeting compliance - number of active SW permits in watershed - number of phosphorus reducing BMPs since 1998, as possible -Info. provided to and reviewed by - Implementation Committee -Certified Operator reports		2001 and ongoing
13. monitoring	None		
14. contingency plan	-If voluntary efforts fail, impose penalties as needed for failure to reach compliance -Revoke certifications	Bring on line as needed to achieve compliance and avoid penalties	2005 and ongoing
15. updating strategy	As needed; Implementation Committee to provide strategic updates	Communications efforts of Impl. Comm. will keep information accessible	2003 and ongoing