United States Environmental Protection Agency | Office of Water Washington, D.C. | EPA 832-F-99-020 September 1999

Storm Water Management Fact Sheet
Internal Reporting

DESCRIPTION

Internal reporting provides a framework for "chain-of-command" reporting of storm water management issues. Typically, a facility develops a Storm Water Pollution Prevention Team (SWPPT) concept for implementing, maintaining, and revising the facility's Storm Water Pollution Prevention Plan (SWPPP). The purpose of identifying a SWPPT is to clarify the chain of responsibility for storm water pollution prevention issues and to provide a point of contact for personnel outside the facility who need to discuss the SWPPP.

APPLICABILITY

The U.S. EPA first identified internal reporting as a BMP in the late 1970s. Currently, internal reporting has evolved into the development of a SWPPT for facilities implementing a SWPPP as part of their NPDES storm water discharge permit. This SWPPT concept is a new and innovative part of the SWPPP.

ADVANTAGES AND DISADVANTAGES

Internal reporting is an essential part of any good record keeping program. When properly implemented, an internal reporting program can clearly define individual's roles and responsibilities for implementing and maintaining the SWPP, thereby making it easier to prevent and contain potential storm water contamination.

Limitations involved in developing an internal reporting system are:

- Corporate commitment in designating appropriate funds may be lacking.
- Inadequate staff hours may be available for proper implementation.
- Low motivation from SWPPT members could inhibit the transfer of key storm water pollution information.

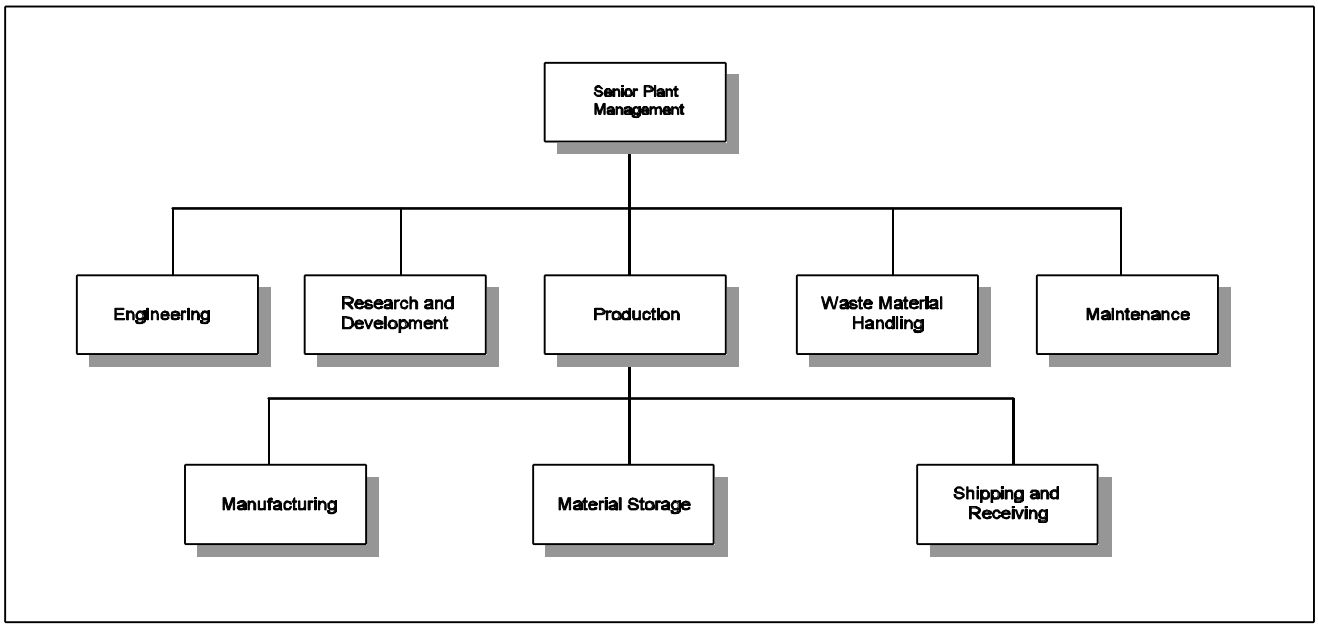
KEY PROGRAM COMPONENTS

When establishing an internal reporting structure, it is important to select appropriate personnel at all levels to serve on the team. Both team and individual responsibilities should be designated with clear goals defined for proper storm water management. Internal reporting should be tied to other baseline BMPs, such as employee training, individual inspections, and record keeping to ensure proper implementation. Figure 1 illustrates an example SWPPT organization chart.

IMPLEMENTATION

The key to implementing internal reporting as a BMP is to establish a qualified SWPPT. When setting up a SWPPP, it is important to identify key people on-site who are most familiar with the facility and its operations and who can also provide adequate structure and direction to the facility's entire storm water management program.

The performance and effectiveness of a facility's internal reporting system is highly variable and dependent upon several factors. Key factors include:



Source: U. S. EPA, 1992.

FIGURE 1 EXAMPLE OF A SWPPT ORGANIZATION CHART

- Commitment of senior management.
- Sufficient time and financial resources.
- Quality of implementation.
- Background and experience of the SWPPT.

To ensure that an internal reporting system remains effective, the person or team responsible for maintaining the SWPPP must be aware of any changes in plant operations or with key team members to determine if modifications must be made in the overall execution of the SWPPP.

COSTS

Costs associated with implementing an internal reporting system are those associated with additional staff hours and related overhead costs. Annual costs can be estimated using the example shown in Table 1. Table 2 can be used as a worksheet to calculate the estimated costs for an internal record keeping program.

REFERENCES

1. U.S. EPA, 1981. *NPDES BMP Guidance Document.*

2. U.S. EPA, 1992. *Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices.* EPA 832-R-92-006.

ADDITIONAL INFORMATION

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TABLE 1 EXAMPLE OF ANNUAL INTERNAL REPORTING COSTS

Title	Quantity		Average Hourly Rate ($)		Overhead* Multiplier		Estimated Yearly Hours on SW Training		Estimated Annual Cost ($)
Stormwater Engineer	1	x	15	x	2.0	x	20	=	600
Plant Management	5	x	20	x	2.0	x	10	=	2,000
Plant Employees	100	x	10	x	2.0	x	5	=	10,000
					Total Estimated Annual Cost				**$12,600**

*Note: Defined as a multiplier (typically between 1 and 3) that takes into account those costs associated with payroll expenses, building expenses, etc.

Source: U.S. EPA, 1992.

TABLE 2 EXAMPLE OF ANNUAL INTERNAL REPORTING COST WORKSHEET

Title	Quantity		Average Hourly Rate ($)		Overhead Multiplier		Estimated Yearly Hours on SW Training		Estimated Annual cost($)
_____	_____	x	_____	x	_____	x	_____	=	_____ (A)
_____	_____	x	_____	x	_____	x	_____	=	_____ (B)
_____	_____	x	_____	x	_____	x	_____	=	_____ (C)
_____	_____	x	_____	x	_____	x	_____	=	_____ (D)
			Total Estimated Annual Reporting Cost		_____		**(Sum of A+B+C+D)**		

Source: U.S. EPA, 1992.

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