

MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM FORM K - APPLICATION FOR INDIVIDUAL SMALL MS4 GENERAL PERMIT

(FORM M MUST ALSO BE SUBMITTED)

FOR AGENCY USE ONLY CHECK NUMBER OR JETPAY CONFIRMATION #

DATE RECEIVED

FEE SUBMITTED

PLEASE READ ALL THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM.

SUBMITTAL OF AN INCOMPLETE APPLICATION MAY RESULT IN THE APPLICATION BEING RETURNED. (FOR CO-PERMITEE SMALL MS4S PLEASE FILL OUT FORM L)					
1. REASON FOR	APPLICATION				
	municipality/area is currently operating a s a new permit.	separate sto	rm sewer system under	мо <u>R040024</u> .	
	application is for coverage under the MC application is for coverage under the MC			Permit.	
2. NAME OF MUN	ICIPALITY/AREA				
NAME OF MUNICIPALITY/A	enne Prairie				_
ADDRESS (HEADQUARTE 2032 Hanley		Dardenne	Prairie	Missouri	ZIP CODE <b>63368</b>
3. OWNER					
City of Darde	nne Prairie			(636) 561-17	
EMAIL ADDRESS  City of Darden	ne Prairie				
ADDRESS (MAILING) 2032 Hanley R	Road	Dardenne	Prairie	Missouri	ZIP CODE <b>63368</b>
4. CONTINUING A	UTHORITY			·	
City of Darde	nne Prairie			TELEPHONE NUMBER V (636) 561-1	
EMAIL ADDRESS Dan.	Lang@DardennePrairie.org				
ADDRESS (MAILING) 2032 Hanley Road  CITY Dardenne Prairie  STATE Missouri 63368				ZIP CODE 63368	
5. MUNICIPALITY					
Dan Lang  TELEPHONE WITH AREA CODE (636) 561-1718					
TITLE City Administrator					
E-MAIL ADDRESS  Dan.Lang@	DardennePrairie.org				
6. REPRESENTAT	TIVE STORMWATER OUTFALLS (ATT	ACH ADDITIO	NAL SHEETS AS NEC	CESSARY)	
Outfall Number	Legal Description		GPS Coordinates (specify units)	Receiving Water Body	
Qtr 1	¼ Qtr 2¼ Sec T	R	see attached list		
Qtr 1	¼ Qtr 2¼ Sec T	R			,
Qtr 1 1/4 Qtr 2 1/4 Sec T R					·
Qtr 1 ¼ Qtr 2 ¼ Sec T R					
7. ADDITIONAL M	UNICIPALITY/AREA INFORMATION				

Attach a topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the Regulated MS4 showing the location of the municipality/area in relation to the local road system. Indicate on the map the municipality/area boundaries, the receiving stream(s), and representative stormwater outfalls.

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#### 8. FEES

Permit fees may be paid by attaching a check, or online by credit card or eCheck through the JetPay system. For permit renewals of active permits, fees are invoiced annually via a separate request. Use the URL provided to access JetPay and make an online payment:

- For new general permits (MOR): <a href="https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/604">https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/604</a>
- For modifications: https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/596

#### 9. ELECTRONIC DISCHARGE MONITORING REPORT (eDMR) SUBMISSION SYSTEM

- 1. Electronic Discharge Monitoring Report (eDMR) Submission System. Per 40 CFR Part 127 National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, reporting of effluent limits and monitoring shall be submitted by the permittee via an electronic system to ensure timely, complete, accurate, and nationally consistent set of data about the NPDES program. All general permit covered facilities under this master general permit shall comply with the Department's requirements for electronic reporting.
  - (a) Discharge Monitoring Reporting Requirements.
    - (1) Registration to participate in the Department's eDMR system shall be completed before the first report is due. Registration is done online through the Missouri Gateway for Environmental Management (MoGEM) online portal. Information about the eDMR system can be found at <a href="https://dnr.mo.gov/env/wpp/edmr.htm">https://dnr.mo.gov/env/wpp/edmr.htm</a> and information about MoGEM can be found at <a href="https://dnr.mo.gov/mogem/">https://dnr.mo.gov/mogem/</a>. The first user shall register as an Organization Official and the association to the facility must be approved by the Department.
    - (2) The permittee must electronically submit compliance monitoring data via the eDMR system. In regards to Standard Conditions Part I, Section B, #7, the eDMR system is currently the <u>only</u> Department approved reporting method for this permit.
  - (b) Electronic Submissions. After successful account registration, to access the eDMR system use the following link in your web browser: <a href="https://apps5.mo.gov/mogems/welcome.action">https://apps5.mo.gov/mogems/welcome.action</a>. If you experience difficulties with using the eDMR system you may contact <a href="mailto:edmr@dnr.mo.gov">edmr@dnr.mo.gov</a> or call 855-789-3889 or 573-526-2082 for assistance.
  - (c) Waivers from Electronic Reporting.
    - (1) The permittee must electronically submit compliance monitoring data and reports unless a waiver is granted by the Department in compliance with 40 CFR Part 127.
    - (2) The permittee may obtain a temporary or permanent electronic reporting waiver by first submitting an eDMR Waiver Request Form (Form 780-2692): <a href="http://dnr.mo.gov/forms/780-2692-f.pdf">http://dnr.mo.gov/forms/780-2692-f.pdf</a>, by contacting the appropriate permitting office or emailing <a href="mailto:edmr@dnr.mo.gov">edmr@dnr.mo.gov</a>. The Department will either approve or deny this electronic reporting waiver request within 120 calendar days of receipt.
    - (3) Only permittees with an approved waiver request may submit monitoring data and reports on paper to the Department for the period the approved electronic reporting waiver is effective.
  - (d) Other actions. The following shall be submitted electronically after such a system has been made available by the Department:
    - (1) General Permit Applications/Notices of Intent to discharge (NOIs);
    - (2) Notices of Termination (NOTs);
    - (3) No Exposure Certifications (NOEs); and
    - (4) Low Erosivity Waivers and Other Waivers from Stormwater Controls (LEWs).

#### 9. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME AND OFFICIAL TITLE (TYPE OR PRINT)  Dan Lang, City Administrator	TELEPHONE NUMBER WITH AREA CODE (636) 561-1718
SIGNATURE	DATE SIGNED

Before mailing, please ensure all sections are complete and additional forms, if applicable, are included. Submitting an incomplete form may result in the Department returning the application.

HAVE YOU INCLUDED THE FOLLOWING?
☐ Appropriate fees
☐ Map at 1" = 2000'
☐ Form M

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#### INSTRUCTIONS FOR COMPLETING FORM K - APPLICATION FOR SMALL MS4 GENERAL PERMIT

- 1. Check which options are applicable.
- Name of municipality/area to be permitted by what name is this area known locally. Examples: O'Fallon MS4, Joplin MS4, Federal Medical Prison MS4, etc. Give the street address of the municipality/area's headquarters.
- 3. Owner An entity who owns and controls the use, operation, and maintenance of a separate storm sewer. Provide the legal name, mailing address, phone number, and email address of the owner. Correspondence will be mailed to the owner address listed on this application.
- 4. Continuing Authority A continuing authority is a company, business, entity or person(s) that will be operating the facility and/or ensuring compliance with the permit requirements. A continuing authority is not, however, an entity or individual that is contractually hired by the permittee to sample or operate and maintain the system for a defined time period, such as a certified operator or analytical laboratory. To access the regulatory requirement regarding continuing authority, 10 CSR 20-6.010(2), please visit <a href="https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf">https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf</a>. A continuing authority's name must be listed exactly as it appears on the Missouri Secretary of State's (SoS's) webpage: <a href="https://bsd.sos.mo.gov/BusinessEntity/BESearch.aspx?SearchType=0">https://bsd.sos.mo.gov/BusinessEntity/BESearch.aspx?SearchType=0</a>, unless the continuing authority is an individual(s), government, or otherwise not required to register with the SoS.
- 5. Municipality/area contact Provide the name, title, work phone number, and email address of a person who is thoroughly familiar with the operation of the MS4 program and with the facts reported in this application and who can be contacted by the Department.
- 6. A stormwater outfall is the point(s) at which stormwater is discharged to a receiving stream. Outfall location(s) should be given in terms of the legal description. Sufficient information should be submitted so Department staff may locate the stormwater outlet. Receiving water(s) the name of the first named receiving water body to which each stormwater discharge is directed.
- 7. A U.S. Geological Survey 1" = 2,000' scale map showing the municipality/area in relation to the local road systems and receiving water(s). U.S. Geological Survey topographic maps are available from the Department's Missouri Geologic Survey in Rolla, MO at 573-368-2100 or an aerial photograph with appropriate detail available from various online mapping applications. To the best of your ability mark boundaries, outfall locations, and receiving water body(ies).
- 8. Applicants can pay fees online by credit card or eCheck through a system called JetPay.
  - Per Section 37.001, RSMo, a transaction fee will be included. The transaction fee is paid to the third party vendor JetPay, not the Department of Natural Resources.
  - Be sure to select the correct fee type and corresponding URL to ensure your payment is applied appropriately. If you are
    unsure what type of fee to pay, please contact the Water Protection Program's Budget, Fees, and Grants Management Unit by
    phone at (573) 522-1485 for assistance.
  - Upon successful completion of your payment, JetPay provides a payment confirmation. Submit this form with a copy of the
    payment confirmation if requesting a new permit or a permit modification. For permit renewals of active permits, the
    Department will invoice fees annually in a separate request.
  - If you are unable to make your payment online, but want to pay with credit card, you may email your name, phone number, and invoice number, if applicable, to <a href="mailto:wppfees@dnr.mo.gov">wppfees@dnr.mo.gov</a>. The Budget, Fees, and Grants Management Unit will contact you to assist with the credit card payment. Please do not include your credit card information in the email.
  - Applicants can find fee rates in 10 CSR 20-6.011 at <a href="https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf">https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf</a> (<a href="https://dnr.mo.gov/pubs/pub2564.htm">https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf</a>
     (<a href="https://dnr.mo.gov/pubs/pub2564.htm">https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf</a>
  - This form must be submitted with the application fee if requesting a new permit or permit modification.
- 9. Electronic Discharge Monitoring Report (eDMR) Submission System Visit <a href="http://dnr.mo.gov/env/wpp/edmr.htm">http://dnr.mo.gov/env/wpp/edmr.htm</a> to find the eDMR Permit Holder and Certifier Registration Form and information about the eDMR system.

Waivers from electronic reporting may be granted by the Department per 40 CFR 127.15 under certain, special circumstances. A written request must be submitted to the Department for approval. Waivers may be granted to facilities owned or operated by:

- A. members of religious communities that choose not to use certain technologies or
- B. permittees located in areas with limited broadband access. The Federal Communications Commission (FCC) has created a broadband internet availability map: <a href="https://broadbandmap.fcc.gov/#/">https://broadbandmap.fcc.gov/#/</a>. Please contact the Department if you need assistance.
- 9. Signature all applications must be signed as follows and the signature must be original. For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this Part, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA). Include the name and title of the person signing the form and the date of signing.

#### Please send questions and mail completed forms with appropriate fees to the appropriate office:

- Water Protection Program-Operating Permits Section, 573.522.4502, P.O. BOX 176, Jefferson City, MO 65102
   All permitting actions in Camden, Cole, Maries, Miller, Moniteau, Morgan, Osage, Phelps, Pulaski and Pettis Counties.
- Regional Offices based on the county where the facility is physically located outside the counties listed above: https://dnr.mo.gov/regions/index.html.

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## Supplement to Form K – Application for Individual Small MS4 General Permit

### Section 6.00

The legal descriptions for the locations of the main points where storm water leaves the City's boundaries are as follows:

- 1. The SE ¼ of the NW ¼ of Section 2, Township 46 North, Range 2 East of the 5th Principal Meridian (-90.7657, 38.7733) (Georgetown)
- 2. The SE ¼ of the NW ¼ of Section 2, Township 46 North, Range 2 East of the 5th Principal Meridian (-90.7658, 38.7735) (Feise)
- 3. The SE ¼ of the NW ¼ of Section 2, Township 46 North, Range 2 East of the 5th Principal Meridian (-90.7654, 38.7740) (LandingV)
- 4. The SE ¼ of the NW ¼ of Section 2, Township 46 North, Range 2 East of the 5th Principal Meridian (-90.7653, 38.7753) (Landing)
- 5. The SW ¼ of the SW ¼ of Section 36, Township 47 North, Range 2 East of the 5th Principal Meridian (-90.7519, 38.7809) (Knollshire)
- 6. The NW ¼ of the NW ¼ of Section 1, Township 46 North, Range 2 East of the 5th Principal Meridian (-90.7377, 38.7761) (Bryan)
- 7. The NW ¼ of the NE ¼ of Section 8, Township 46 North, Range 3 East of the 5th Principal Meridian (-90.7094, 38.7648) (Peaceful)
- 8. The SW ¼ of the NE ¼ of Section 17, Township 46 North, Range 3 East of the 5th Principal Meridian (-90.7082, 38.7439) (Waterford)
- 9. The NW ¼ of the SW ¼ of Section 16, Township 46 North, Range 3 East of the 5th Principal Meridian (-90.7006, 38.7392) (Sportsman)
- 10. The SE ¼ of the SW ¼ of Section 20, Township 46 North, Range 3 East of the 5th Principal Meridian (-90.7096, 38.7256) (Leighton)
- 11. The South ½ of U.S. Survey 1669, Township 46 North, Range 3 East of the 5th Principal Meridian (-90.7160, 38.7241) (Westborough)
- 12. The South ½ of U.S. Survey 1669, Township 46 North, Range 3 East of the 5th\ Principal Meridian (-90.7223, 38.7217) (64West)

### Section 6.10

The receiving streams for the locations of the main points where storm water leaves the City's boundaries are as follows:

- 1. Receiving Water Lake St. Louis (L3)
- 2. Receiving Water Lake St. Louis (L3)
- 3. Receiving Water Lake St. Louis (L3)
- 4. Receiving Water Lake St. Louis (L3)
- 5. Receiving Water Lake St. Louis (L3)
- 6. Receiving Water Dardenne Creek (P)
- 7. Receiving Water Dardenne Creek (P)
- 8. Receiving Water Dardenne Creek (P)
- 9. Receiving Water Dardenne Creek (P)
- 10. Receiving Water Schote Creek (P)
- 11. Receiving Water Schote Creek (P)
- 12. Receiving Water Schote Creek (P)



## MISSOURI DEPARTMENT OF NATURAL RESOURCES

WATER PROTECTION PROGRAM,

FORM M - APPLICATION FOR STORMWATER GENERAL PERMIT: PHASE 2 SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PROGRAM (FORM K OR L MUST BE INCLUDED)

1. MUNICIPALITY/AREA INFORMATION
1.1 Name of municipality/area(s) to be covered by this permit:
1.2 Physical location of municipality/area(s) (address assigned):
1.3 Total area of municipality/area (s) acres or square miles.
2. STORMWATER MANAGEMENT PLAN (SWMP) INFORMATION (Attach additional sheets as necessary)
2.1 A Stormwater Management Plan (SWMP) must be developed for this municipality/area. This plan must be developed in accordance with requirements & guidelines specified within the general permit for stormwater discharges from regulated MS4 activities.
a.This application is for coverage under the MOR04 Two-step MS4 General Permit. The application will be considered incomplete if the SWMP has not been developed in accordance with the terms of the general permit. A copy of the SWMP must be submitted along with this application.
b.This application is for coverage under the MOR04C Comprehensive MS4 General Permit.
2.3 Summarize the measures from the SWMP that will be used for <b>PUBLIC EDUCATION AND OUTREACH</b> .  Create a storm water web page to provide the public with information on storm water pollution and storm water
management within Dardenne Prairie. The site will also feature access to a storm water problem reporting form that car used to notify the City of storm water concerns, detect illicit discharges, and provide input from the community on storm water management within Dardenne Prairie. Addition of a storm water impact section to the City's Newsletter. Twice easyear, Dardenne Prairie will include a storm water impact section to the City Newsletter that will inform citizens of the web and the problem reporting form, describe where citizen's may obtain information related to storm water pollution.
2.4 Summarize the measures from the SWMP that will be used for <b>PUBLIC INVOLVEMENT AND PARTICIPATION</b> .
Develop public notice procedures in support of ongoing programs such as advertising group meetings, providing public notices of storm water management policy hearings, and other informational meetings in accordance with State requirements. Enlist volunteers and continually participate in the clean stream days. Volunteers from area municipalities and organizations remove trash, debris, and other pollutants from local creeks.
2.5 Summarize the measures from the SWMP that will be used for ILLICIT DISCHARGE DETECTION AND ELIMINATION.
Development and implementation of an ordinance prohibiting illicit discharges to the storm water system, including fund inspection, and enforcement mechanisms. Development of a storm water web page with access to a Storm Water Prob. Reporting Form on the City's existing web site. The storm water problem reporting form will also be made available with City Clerk. Addition of a storm water impact section to the City's Newsletter. Development of a plan for the creation of a storm sewer system map showing major storm sewer discharge points, outfalls, and topography.
2.6 Summarize the measures from the SWMP that will be used for <b>CONSTRUCTION SITE STORM WATER RUNOFF CONTROL</b> .
City ordinances that: Require any person(s) performing any earth moving activity to comply with minimum erosion and siltation control standards. Create instructions for proper installation and maintenance of various techniques for sediments.

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and erosion control. Require the establishment of separate escrows for sediment and erosion control. Establish penalties for non-compliance with any of these items. Establish a written procedure for the development, review, and approval of sediment and erosion control plans for all developments. Provide for regular inspections of sediment and erosion control.

2.7 Summarize the measures from the SWMP that will be used for <b>POST CONSTRUC</b>	CTION STORM WATER MANAGEMENT.
Development of a plan for the creation of a storm sewer system map showing rand topography. This map will also include the storm water impact rankings of Development of a comprehensive storm water policy that seeks to integrate storegulations and comprehensive planning.	developments throughout the City.
2.8 Summarize the measures from the SWMP that will be used $\underline{\textbf{FOR POLLUTION PR}}$	EVENTION AND GOOD HOUSEKEEPING.
Develop or improve post-development best management practices at government though the City municipal operations are small, this item will raise the awarene employees. Therefore, it will make the City staff more effective at identifying calso make certain that municipal operations are setting the pace relative to sto	ess of urban storm water pollution for City oncerns at sites throughout the City. It will
3. MUNICIPALITY/ AREA WATER BODY INFORMATION	
3.1 The municipality/area(s) or discharge from MS4 is within 100 feet of waters classific Standards (check each that applies, and for those present, please identify their local standards.	
☐ Public drinking water supply lake (L1) ☐ Major res	ervoirs (L2)
☐ Outstanding national or state resource waters ☐ Streams of	designated for cold-water habitat
☐ Permanently flowing streams (P), except for Missouri and Mississippi Rivers	
None	
3.2 Is the discharge from the MS4 within two stream miles upstream of biocriteria refe 7.031?	rence locations as defined in 10 CSR 20-
☐ YES (If yes, please list these receiving waters in an attachment.) ☐ N	NO NO
3.3 Is any part of the area(s) defined as wetland?   YES   NO	
Note: A Clean Water Act, Section 404 Permit may be required for the developmen Of Engineers.	t in wetland area(s) from the US Army Corps
3.4 Does any of the stormwater discharge to a sinkhole, losing stream, or any other to conduit to ground water?	pographical feature that would be a direct
☐ YES (If yes, please identify the location(s) of these geologic features in an a	ttachment.) NO
4. CERTIFICATION	
4.1 I certify under penalty of law that this document and all attachments were prepared accordance with a system designed to assure that qualified personnel properly gased on my inquiry of the person or persons who manage the system, or those proformation, the information submitted is, to the best of my knowledge and belief, there are significant penalties for submitting false information, including the possib violations.	ther and evaluate the information submitted. bersons directly responsible for gathering the rue, accurate, and complete. I am aware that
(Attach additional pages if additional signatures are required for a co-permit).	
OWNER OR AUTHORIZED REPRESENTATIVE	OFFICIAL TITLE
EMAIL ADRESS	TELEPHONE NUMBER WITH AREA CODE
SIGNATURE	DATE SIGNED

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## **COVER PAGE**

(Feel free to customize the cover page as long as it includes at least the information below)

City of (Insert permittee name) MS4
Stormwater Management Plan
(Permit Number / 2021 - 2026)
(Date of revision)

# **SWMP INFO. PAGE**

## **Table of Contents and Appendices:**

This section is optional; however, it is highly recommended and helpful especially when the SWMP includes multiple appendices. If a table of contents will not be utilized in your SWMP, this section may be deleted.

## **Contact Information (3.1.B):**

Names, Titles, Phone Numbers, and Emails for the person or all people responsible for implementing the permittee's Stormwater Program. This section should include the person or people who are considered the primary contact(s) for correspondence to be sent to or any questions regarding the permittee's Program or SWMP to be directed to. If there are multiple people, specify who is responsible for what. If there is only one person responsible, indicate next to their name that they are the Primary Person Responsible for all MCMs.

### Example:

Primary Contact and Primary Person Responsible for MCM 4 and MCM 5:

John Smith, P.E., Public Works – Engineering

Phone: (555)555-5555 / Email: jsmith@cityemail.com

Secondary Contact and Primary Person Responsible for MCM 1 and MCM 2:

Jane Doe, Stormwater Division

Phone: (555)555-5555 Ext. 555 / Email: jdoe@cityemail.com

OR

Primary Contact and Primary Person Responsible for all MCMs:

Joe Jones, P.E., Director of Public Works

Phone: (555)555-5555 / Email: jjones@cityemail.com

## **Regulatory and Background Information:**

This section is optional and is for identifying if you are a newly designated MS4 (within your first five years of designation) or if you are an established MS4 and any other relevant information pertaining to your MS4's regulatory status.

Additionally, some Permittees have unique background information they'd like to share to help put certain aspects of their Stormwater Program and SWMP into context or give perspective. This is absolutely welcomed, but it is not necessary. If your MS4 does not have any unique

historical or background information that is relevant to your Stormwater Program, no additional detail is needed here and this section may be deleted if not being utilized.

## **TMDL Information:**

This section is for identifying if your MS4 is impacted by one or more waterways with a designated TMDL. If you do not have a TMDL, simply state "Not Applicable" here.

If your MS4 is impacted by a TMDL, include in this section:

YES, our MS4 is impacted by a waterway or waterways with a TMDL.

Please list the name(s) of the impacted waterway(s).

Please also list the pollutant(s) of concern for each waterway.

### YES/NO, we do/do not have a completed ARAP for the listed waterway(s).

If yes, please indicate here if your ARAP is incorporated into your SWMP as part of the document, or if your ARAP is a separate document included as an appendix item. Please also include any other relevant information about the TMDL as it relates to the MS4.

If your ARAP is under development, please indicate that here and include the schedule to complete the ARAP and when it is expected to be submitted for Department review/approval.

## **Co-Permittee Information (3.2):**

This section is for co-permitted MS4s only. If you are not a co-permitted MS4, simply state "Not Applicable" here. This is for identifying who your co-permittees are and what your agreement is with them to ensure compliance with all permit requirements. This is also where you would include any additional relevant information about the co-permittee relationship.

## **Stormwater Program Review and BMP Iterative Process (3.3):**

The permit requires that the permittee shall conduct, at minimum, an annual review of their Stormwater Management Program. This section is for giving a general overview of the Permittee's adaptive management or iterative process for their Stormwater Program.

#### **EXAMPLE**:

The statement included here could be as simple as: The City evaluates the Stormwater Management Program and all BMPs in the SWMP annually for effectiveness and to identify areas for improvement. The information collected is included in the City's annual report.

# **MCMs**

## MCM 1. Public Education and Outreach of Stormwater Impacts

The permittee shall implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

- **4.1.A** Identify target audiences and explain why the target audiences are likely to have significant stormwater pollution impacts in the SWMP;
- **4.1.B** Identify target pollutants and/or sources of pollution that the permittee's education program is designed to address and how those pollutants/ sources relate to the specific target audience(s); and
- **4.1.C** Develop or utilize appropriate educational BMPs (materials, events, activities, etc.) to be used in conjunction with the target pollutants and target audiences. Explain opportunities about the BMPs and how the BMPs inform and educate target audiences to reduce pollutants in stormwater runoff.

A list or table works best here to include all detail needed to satisfy 4.1.A, 4.1.B, and 4.1.C. The example below is a table format and may be deleted if a list format will be utilized instead.

Target Audiences:	Explanation of why audience was chosen:	<u>Target</u> Pollutants:	Sources of Pollution:	Educational BMP(s)	Goal of BMP
EXAMPLE: Contractors/ Developers	EXAMPLE: Improperly managed land disturbance sites lead to sediment runoff, chemical/toxics spills, trash/waste/floatables leaving the site	EXAMPLE: Sediment/ Suspended Solids, chemicals/ toxics, floatables	EXAMPLE: Construction workers	EXAMPLE:  1. Handouts on proper site management given out during permitting  2. Site management discussion during preconstruction meeting	EXAMPLE: Educate construction workers on the importance of proper installation of site BMPS and site management to reduce target pollutants in runoff
EXAMPLE: Lawn Care Businesses	EXAMPLE: Improperly managed lawn care activities lead to over-application of fertilizers or weeding chemicals and improper disposal of leaf litter or grass clippings	EXAMPLE: fertilizers (nutrients), chemicals/ toxics, yard waste	EXAMPLE: Lawn care workers	EXAMPLE:  1. Educational mailers to lawn care businesses on proper yard care and waste disposal.	EXAMPLE: Educate lawn care professionals on the importance of proper application of fertilizers and chemicals and proper disposal of yard waste to reduce target pollutants in runoff
Continue list here					
Continue list here					

### 3.1.B Measurable Goals:

Important! Please note that measurable goals are only included in the template here, but measurable goals must be included within or at the end of every MCM in the SWMP, or compiled for all MCMs as an appendix item (see Appendix A). Failure to include measurable goals for the BMPs in all MCMs will result in an incomplete SWMP.

Tables work best for measurable goals, but a paragraph describing the measurable goal(s) is fine as well as long as all the relevant detail is included. For each BMP, there must be clearly explained, detailed information included on:

- BMP name or description;
- The goal and/or expected result of the BMP;
- Actions taken by the permittee to implement the BMP;
- A clear description of how the BMP is evaluated for appropriateness and progress toward the goal/expected result;
- The measurable goals shall be quantifiable or a clearly explained justification for why the measurable goal is not quantifiable must be included;
- The BMP should include milestones throughout the permit cycle to track progress;
- The BMP should clearly identify the method(s) used for measuring the BMP's progress and outcome;
- The iterative process used for how the BMP is evaluated for effectiveness; and
- If applicable, impaired water bodies should be listed and any specific efforts taken as part of the ARAP.

(See Section 3.1.B of the permit for specific details on any of the above requirements for Measurable Goals)

EXAMPLES (Choose the best option for your Program to use for each MCM in the SWMP. A customized variation of the examples below may be used in your SWMP as long as it includes all required information/details):

Table formats –

TABLE FORMAT A.:

Measurable Goal BMP 1	EXAMPLE: Stormwater Webpage Tracking - Track the number of visitors to our stormwater informational webpage (include link) and content within the webpage each year. Update the webpage content with the most current and best information available.					
Purpose of BMP	EXAMPLE: The internet allows for unlimited access to our target audiences to provide education, readily available information, and a platform for 24/7/365 access to submit feedback, questions, or concerns on environmental issues.					
BMP Goal/ Intended Outcome	EXAMPLE: Educate the public and target audiences on environmental issues. The intended outcome for this BMP is to see an increase in webpage use as the public becomes more aware of environmental issues.		Annual Performance Tracking (per year of permit cycle)			
EXAMPLE: Total visitors to webpage Stormwater brochure views Yard Waste Disposal brochure views Rain Garden brochure views SWMP document views		90 36 8 44	96 36 8 42	102 38 6 45		

Yr. 1 Progress to Goal:	Satisfactory: YES: ⊠ NO: □ (Use for Annual Report)		
Explanation: (Use for Annual Report)	EXAMPLE: Evaluation of this BMP demonstrates an overall positive trend in visits to our website and sets a baseline for the		
Yr. 2 Progress to Goal:	following years' evaluations.  Satisfactory: YES:   NO: □ (Use for Annual Report)		
Explanation: (Use for Annual Report)	EXAMPLE: Evaluation of this BMP demonstrates an overall positive trend in visits to our website.		
Yr. 3 Progress to Goal:	Satisfactory: YES: ⊠ NO: □ (Use for Annual Report)		
Explanation: (Use for Annual Report)	EXAMPLE: Evaluation of this BMP demonstrates an overall positive trend in visits to our website, but there were less views of the yard waste brochure this year, so we will provide more outreach to the public in year 4 through public events, school presentations, and door hangers to provide exposure to the public of the availability of information on our website and increase awareness on the importance of proper yard waste disposal.		
Yr. 4 Progress to Goal:	Satisfactory: YES: ☐ NO: ☐ (Use for Annual Report)		
Explanation: (Use for Annual Report)			
Yr. 5 Progress to Goal:	Satisfactory: YES: ☐ NO: ☐ (Use for Annual Report)		
Explanation: (Use for Annual Report)			

### TABLE FORMAT B.:

Spreadsheet. Using a spreadsheet to list your measurable goals for each BMP is a great way to have a significant amount of detail at a glance. For an example of a spreadsheet, please see Appendix A. Please note in the example spreadsheet, only one placeholder for a BMP is listed per permit requirement. The permittee may choose to add multiple BMPs under one permit requirement. Please number accordingly.

#### PARAGRAPH FORMAT:

EXAMPLE: *BMP 1 – Seasonally targeted door hangers.* 

Measurable Goal – The City will distribute seasonal door hangers to at least 90% of the community each year of the permit cycle in the spring/summer, and the late summer/fall. The goal of this BMP is to educate the residents on ways to properly mow their lawns to reduce the amount of grass clippings discharged into the City's streets, and properly dispose of leaf litter. The intended outcome of this BMP is to reduce the amount of yard waste collecting along street curbs, clogging stormwater inlets, and going into the City's storm drains. This BMP will be evaluated annually for its effectiveness by compiling data from resident complaints, maintenance work orders for clogged storm drains caused by improper disposal of yard waste, and visual inspections conducted by public works staff throughout the City. Modifications to the BMP will be made accordingly depending on the success or lack of success the BMP demonstrates each year. For example, if a certain area of the City is found to be a problem area for improper disposal of yard waste, the City will ensure to target that area with door hangers with the expected result that this area will improve by the next annual evaluation.

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## MCM 2. Public Involvement/Participation in Program Development

The permittee shall implement a public involvement/participation program that reaches out and engages the public in the development and implementation of the permittee's Stormwater Management Program.

**4.2.A** The permittee shall hold a public notice period for a minimum of thirty (30) days on the draft SWMP. The permittee shall respond to public comments received during the public notice period. The permittee shall retain copies of any public comments and responses, for a minimum of three years.

The simplest way to address this permit requirement is to give a brief description in the SWMP of the permittee's plan for holding a public notice period, then follow the description with details to demonstrate that the public notice period was held.

EXAMPLE: The City's policy is to hold a public notice period for 45 days on the City's draft SWMP each time significant revisions to the SWMP are made. The City advertises the public notice of the SWMP on the City's website under the stormwater webpage (include link here) with the disclaimer that the draft SWMP will be posted for review and public comment for 45 days. The City also advertises the public notice period in the City's local newspaper (include newspaper name here) under the announcements section. The advertisement in the local newspaper directs the readers to the City's website to review the draft SWMP. The City provides public comment submission through the City's website as well as a mail-in option with the address posted on the website and in the local paper. The City's policy is to respond to all comments submitted by the public within 30 days of receipt and copies of all comments submitted by the public and the corresponding responses are retained by the City for at least 3 years.

The City held a public notice period for the draft SWMP January 18, 2021 – March 4, 2021. The City did not receive any comments from the public during the comment period.

**4.2.B** The permittee shall hold a public hearing regarding the proposed Stormwater Management Program and Plan within the MS4 service area. Public notice of the public hearing shall be given at least thirty (30) days before the hearing. Public notice of the hearing may be given at the same time as public notice of the draft SWMP and the two notices may be combined.

The simplest way to address this permit requirement is to give a brief description in the SWMP of the permittee's plan for holding a public hearing, then follow the description with details to demonstrate that the public notice period and the public hearing were held.

EXAMPLE: The City's policy is to hold a public hearing for the proposed SWMP. Public notice to announce the hearing will be posted on the City's website and in the City's local paper 30 days prior to the hearing. The hearing announcement will remain posted on the website the entire 30 days. The hearing announcement in the City's local paper will run in each issue until the hearing date is past.

The City held a public hearing for the proposed SWMP on (insert date). The meeting agenda and summary notes are available to view on the City's website here (insert link).

**4.2.**C The permittee shall have a publicly available method to accept public inquiries or concerns, and to take information provided by the public about stormwater and stormwater related topics. This method, or a combination of methods, shall cover all MCMs.

The simplest way to address this permit requirement is to give a brief description in the SWMP of the permittee's method(s) for accepting public inquiries/concerns/comments about stormwater and related topics which cover all MCMs. If this information is already included in an SOP, a brief description should be included in the SWMP and a reference to the SOP either via web link, appendix, or relevant excerpt included in the SWMP.

EXAMPLE: The City's utilizes a web-based public comment submission platform located on the City's stormwater web page here (link). The City also provides a customer comment drop box in the lobby of the City hall building for hand written comments/concerns/inquiries. Both the submission options are monitored by City staff daily. The City's policy is to respond to all comments/concerns/inquires within 30 days of receipt. (Note that additional information has been provided in this example that goes beyond what is required by the permit. This is for the purpose of providing clarity, and specificity.)

**4.2.D** If the permittee utilizes a stormwater management panel or committee, the permittee shall provide opportunities for citizen representatives on the panel or committee.

For clarity, this permit requirement must be included in the SWMP whether your MS4 utilizes a stormwater management panel/committee or not. If your MS4 does not utilize a panel/committee, your SWMP simply needs to state under this permit requirement that the permittee does not utilize a stormwater management panel or committee. If the MS4 does utilize a panel/committee, then the SWMP will need to include the additional detail to address the permit requirement.

The simplest way to address this permit requirement is to start this entry in the SWMP with a statement indicating whether or not the permittee utilizes a stormwater management panel or committee, then if applicable, follow that statement with a brief description of the permittee's efforts to provide opportunities for citizen representatives on the panel or committee.

EXAMPLE: The City does not utilize a stormwater management panel or committee.

The City does utilize a stormwater management committee. The committee meets quarterly and has 7 chairs which represent diverse significant stakeholders or target audiences within the MS4. The chairs include:

A City council member or community leader;

A local business owner;

A local contractor or developer;

A law enforcement officer or emergency response personnel;

A licensed civil or stormwater engineer;

A local resident; and

The City Public Works Director (permanent seat, not subject to nomination)

The City offers the opportunity for different citizen representation on the committee annually. Nomination is voluntary. If a citizen would like to sit on the committee for a year term, the citizen would submit a nomination application, located on the City's stormwater web page, to the committee. At the end of the year term, the committee evaluates on all applicants and votes on the new committee members. If no applications are received, the members will continue on the committee until an application is received to replace them. (Note that additional information has been provided in this example that goes beyond what is required by the permit. This is for the purpose of providing clarity, and specificity.).

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## MCM 3. Illicit Discharge Detection and Elimination

The permittee shall implement and enforce a program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200 at 40 CFR 122.26(b)(2)) into the permittee's regulated MS4.

- **4.3.A** Develop, and maintain an up to date storm sewer system map, show the location of all outfalls, the names and location of all waters of the state that receive discharges from those outfalls, and the boundary of the regulated MS4 area.
  - 1. A description of the sources of information or procedures used for the map(s), how the permittee plans to verify the outfall locations with field surveys, and how the map will be regularly updated shall be included in the SWMP.
  - 2. The permittee shall make the map and any accompanying necessary information available to the Department upon request.

For clarity, this permit requirement must be included in the SWMP by reference at the very least. Many cities utilize GIS for their outfall maps, but including a small-scale printed copy in their SWMP is difficult.

The simplest way to address this permit requirement is to start this entry in the SWMP with a statement confirming whether or not the permittee has a completed outfall map, followed by the source(s) of information or procedures used by the permittee to maintain the map. It is recommended that a map be included in the SWMP by paper copy or web link if it is feasible to do so, otherwise the statement indicating the map is completed and available upon request will satisfy this permit requirement. If a copy of the permittee's map or link to view the map is not provided in the SWMP, this permit requirement will be addressed during the audit of the permittee's MS4 program.

For newly designated MS4s, if the permittee's outfall map is still under development, a statement in the SWMP should be included that explains the outfall map is still under development along a schedule of when the map is expected to be completed.

EXAMPLE: The City has a completed storm sewer system map. GIS is utilized to maintain and update the map as needed. The map is accessible to view on the City's stormwater web page (link here).

OR

The City has a completed storm sewer system map. The City utilizes a large-scale master hard copy and utilizes field surveys and engineering plans to maintain and update the map as needed. The map is accessible to view upon request during audits of our MS4 program. All data on the map is retained on file for 5 years for investigation, research, and audit purposes.

OR

The City is a newly designated MS4. The City's storm sewer system map is currently under development. GIS is being utilized to identify outfalls and create the map. The expected completion date of the map is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the map is completed, it will be made available to view on the City's stormwater web page (link here). The map will be updated as needed to modify or add new outfalls.

**4.3.B.** To the extent allowable under state, or local law, through ordinance(s), or other regulatory mechanism(s), the permittee shall effectively prohibit, unauthorized non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions. Identify in the SWMP the regulatory mechanism(s) the permittee will use to effectively prohibit illicit discharges into the MS4 by including a link to or a copy of the relevant sections.

A statement in the SWMP should be included here indicating whether the permittee has an ordinance in place for illicit discharges. If so, the SWMP should include either a copy of the ordinance as an appendix item, a link to the ordinance on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the ordinance.

For newly designated MS4s, if the permittee's ordinance is still under development, a statement in the SWMP should be included that explains the ordinance is still under development along a schedule of when the ordinance is expected to be adopted.

EXAMPLE: The City has a completed Illicit Discharge Ordinance in place. The ordinance is accessible on the City's website (link here). The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Illicit Discharge Ordinance in place. A copy of the ordinance is attached to the SWMP as Appendix B. The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Illicit Discharge Ordinance in place. The relevant excerpts of the ordinance to address the permit requirements are included below. The ordinance is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's Illicit Discharge Ordinance is currently under development. The expected completion date of the ordinance is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the ordinance is adopted, it will be made available to view on the City's website (link here). The ordinance will be reviewed annually and updates will be made as needed.

- **4.3.**C Develop and implement a plan to detect and address unauthorized non-storm water discharges, including illegal dumping, to the system. An explanation of these strategies shall be included in the SWMP with:
  - 1. Applicable response timelines;
  - 2. Procedures for tracing the source of an illicit discharge, including specific techniques used to detect the location of the source;
  - 3. Procedures for removing the illicit discharge; and
  - 4. Other practices that are a part of this plan.

This is where an SOP is helpful and convenient. If an SOP is in place for detecting and addressing unauthorized non-stormwater discharges, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which details the permittee's plan

to detect and address non-stormwater discharges and the SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP. Ensure that the SOP includes all of the applicable details listed in the permit requirement.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still need to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's plan to detect and address non-stormwater discharges into the permittee's MS4. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's plan to detect and address non-stormwater discharges into the permittee's MS4, including details on the permittee's applicable response times, the permittee's procedures for tracing the source of an illicit discharge, including specific techniques used to detect the location of the source, the permittee's procedures for removing the illicit discharge, and any other practices that are a part of the permittee's plan. The more specific detail, the better.

EXAMPLE: The City has an SOP in place for detecting and addressing unauthorized non-stormwater discharges, including illegal dumping, into the City's MS4. The SOP is accessible on the City's website (link here). The SOP is reviewed annually and updates are made as needed.

OR

The City has an SOP in place for detecting and addressing unauthorized non-stormwater discharges, including illegal dumping, into the City's MS4. A copy of the SOP is attached to the SWMP as Appendix B. The SOP is reviewed annually and updates are made as needed.

OR

The City has an SOP in place for detecting and addressing unauthorized non-stormwater discharges, including illegal dumping, into the City's MS4. The relevant excerpts of the SOP to address the permit requirements are included below. The SOP is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's plan for detecting and addressing unauthorized non-stormwater discharges, including illegal dumping, into the City's MS4 is currently under development. The expected completion date of the plan is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the plan is finalized, it will be made available to view as an SOP on the City's website (link here). The SOP will be reviewed annually and updates will be made as needed.

OR

Insert a detailed summary of the permittee's plan here. Please note that the plan must be described in clear, specific detail. The more specific detail the better. A good rule of thumb to use when including the description of any plan in the SWMP is if someone with no knowledge of your MS4 Program or this particular plan can read the plan and know exactly what to do and how to do it to effectively execute the plan, then you've included enough detail. If someone were

to read the plan and was left with questions on how to execute the plan, the plan does not include enough detail.

**4.3.D** The permittee shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and the improper disposal of waste. The SWMP shall include a description of how this plan will coordinate with all other minimum control measures, monitoring, Integrated Planning (where applicable), and TMDL implementation (where applicable).

The simplest way to address this permit requirement is to give a brief description in the SWMP of how the permittee informs public employees, businesses and the general public of hazards associated with illegal discharges and the improper disposal of waste. The description should also include details on how the permittee disseminates this information and how often. Following the description, an explanation should be included of how the permittee's plan to inform public employees, businesses and the general public of hazards associated with illegal discharges and the improper disposal of waste coordinates with all other MCMs, monitoring, Integrated Planning (where applicable), and TMDL implementation (where applicable).

This additional information must be included in the SWMP under this permit requirement in order for the SWMP to be considered complete. If the permittee chooses to include the detail on how the permittee's plan coordinates with all the other MCMs, monitoring, Integrated Planning (where applicable), and TMDL implementation (where applicable) in a separate section of the SWMP dedicated only to the specific detail, a note must be made under this permit requirement to direct the reader/reviewer to the specific part of the SWMP where this detail on how the permittee's plan coordinates with all other MCMs, monitoring, Integrated Planning (where applicable), and TMDL implementation (where applicable). Failure to include this detail will result in an incomplete SWMP and rejection of the MS4's permit renewal application if applying for the MOR04 (2-step) permit.

EXAMPLE: The City's plan for informing public employees, businesses and the general public of hazards associated with illegal discharges and the improper disposal of waste is.... (insert specific details on the permittee's plan here)

How the *permittee's* plan coordinates with MCM #1: (insert specific details here)

How the *permittee's* plan coordinates with MCM #2: (*insert specific details here*)

How the *permittee's* plan coordinates with MCM #4: (*insert specific details here*)

How the *permittee's* plan coordinates with MCM #5: (insert specific details here)

How the *permittee's* plan coordinates with MCM #6: (*insert specific details here*)

How the *permittee's* plan coordinates with monitoring: (insert specific details here or "N/A, the City does not conduct routine monitoring.")

How the *permittee's* plan coordinates with Integrated Planning: (insert specific details here or "N/A, the City does not utilize Integrated Planning.")

How the *permittee's* plan coordinates with TMDL Implementation: (*insert specific details here or "N/A, the City is not impacted by a TMDL.")* 

**4.3.E** Implement a dry weather field screening strategy for unauthorized non-stormwater flows. The SWMP shall include a description of diagnostic monitoring procedures, including

procedures for visual screening, sampling, or field analyzation and what parameters are sampled for to be used as indicators of discharge sources.

This is another permit requirement where an SOP is helpful and convenient. If an SOP is in place for the permittee's dry weather field screening strategy for unauthorized non-stormwater flows, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which details the permittee's plan for implementation of a dry weather field screening strategy for unauthorized non-stormwater flows and the SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP. **Ensure that the SOP includes all of all of the applicable details listed in the permit requirement**.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's plan to implement a dry weather field screening strategy for unauthorized non-stormwater flows. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's plan to implement a dry weather field screening strategy for unauthorized non-stormwater flows, including details on the permittee's procedures for visual screening, sampling, or field analyzation and what parameters are sampled for to be used as indicators of discharge sources, and any other practices that are a part of the permittee's plan. The more specific detail, the better.

EXAMPLE: The City has an SOP in place for implementation of a dry weather field screening strategy for unauthorized non-stormwater flows. The SOP is accessible on the City's website (link here). The SOP is reviewed annually and updates are made as needed.

OR

The City has an SOP in place for implementation of a dry weather field screening strategy for unauthorized non-stormwater flows. A copy of the SOP is attached to the SWMP as Appendix B. The SOP is reviewed annually and updates are made as needed.

OR

The City has an SOP in place for implementation of a dry weather field screening strategy for unauthorized non-stormwater flows. The relevant excerpts of the SOP to address the permit requirements are included below. The SOP is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's plan for implementation of a dry weather field screening strategy for unauthorized non-stormwater flows is currently under development. The expected completion date of the plan is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the plan is finalized, it will be made available to

view as an SOP on the City's website (link here). The SOP will be reviewed annually and updates will be made as needed.

OR

Insert a detailed summary of the permittee's plan here. Please note that the plan must be described in clear, specific detail. The more specific detail the better. A good rule of thumb to use when including the description of any plan in the SWMP is if someone with no knowledge of your MS4 Program or this particular plan can read the plan and know exactly what to do and how to do it to effectively execute the plan, then you've included enough detail. If someone were to read the plan and was left with questions on how to execute the plan, the plan does not include enough detail.

**4.3.F** Maintain and describe procedures to identify priority areas likely to have illicit discharges such as, but not limited to, any area where there is ongoing evidence of illicit discharges, or dumping; areas with higher likelihood of illicit connections such as neighborhoods with onsite sewage; or regions with a high percentage of directly connected impervious areas.

Permit requirement 4.3.E and 4.3.F can be covered under the same SOP as long as the specific details in the permit requirement are included. If your MS4 utilizes an SOP for this permit requirement, please follow the same guidance under 4.3.E.

If your MS4 does not utilize an SOP, the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's plan to implement a dry weather field screening strategy for unauthorized non-stormwater flows. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's plan to implement a dry weather field screening strategy for unauthorized non-stormwater flows, including details on the permittee's procedures for visual screening, sampling, or field analyzation and what parameters are sampled for to be used as indicators of discharge sources, and any other practices that are a part of the permittee's plan. The more specific detail, the better.

EXAMPLE: *Insert a detailed summary of the permittee's plan here*. Please note that the plan must be described in clear, specific detail. The more specific detail the better. A good rule of thumb to use when including the description of any plan in the SWMP is if someone with no knowledge of your MS4 Program or this particular plan can read the plan and know exactly what to do and how to do it to effectively execute the plan, then you've included enough detail. If someone were to read the plan and was left with questions on how to execute the plan, the plan does not include enough detail.

**4.3.G** Provide procedures to ensure the permittee's illicit discharge ordinance (or other regulatory mechanism) is implemented by means of appropriate enforcement procedures, including fines, and actions. A description of these enforcement procedures shall be included in the SWMP.

A statement in the SWMP should be included here indicating what the permittee's procedures are to ensure the permittee's illicit discharge ordinance (or regulatory mechanism) is

implemented by means of appropriate enforcement procedures, including fines, and actions. Many permittee's reference their illicit discharge ordinance here if the ordinance includes a procedure for enforcing the ordinance. This is appropriate as long as the ordinance has all the details in the permit requirement included. If the permittee's ordinance has the appropriate detail and procedures included, the SWMP should include either a copy of the ordinance as an appendix item, a link to the ordinance on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the ordinance.

For newly designated MS4s, if the permittee's ordinance and/or enforcement procedure is still under development, a statement in the SWMP should be included that explains the ordinance and/or enforcement procedure is still under development along a schedule of when the ordinance and/or enforcement procedure is expected to be adopted.

EXAMPLE: The City has a completed Illicit Discharge Ordinance which includes enforcement procedures in place. The ordinance is accessible on the City's website (link here). The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Illicit Discharge Ordinance which includes enforcement procedures in place. A copy of the ordinance is attached to the SWMP as Appendix B. The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Illicit Discharge Ordinance which includes enforcement procedures in place. The relevant excerpts of the ordinance to address the permit requirements are included below. The ordinance is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's Illicit Discharge Ordinance which will include enforcement procedures is currently under development. The expected completion date of the ordinance is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the ordinance is adopted, it will be made available to view on the City's website (link here). The ordinance will be reviewed annually and updates will be made as needed.

OR

If your program does not utilize an ordinance for enforcement procedures, the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your program, the simplest way to address this permit requirement is to include a concise summary of the details of how the permittee enforces their illicit discharge ordinance. If there is another plan or SOP that is incorporated into the ordinance by reference, it should be included in the SWMP by link, appendix, or relevant excerpt.

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## MCM 4. Construction Site Stormwater Runoff Control

The permittee shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

- **4.4.A** The permittee shall have an ordinance and/or other regulatory mechanism to require construction site operators to implement erosion and sediment control BMPs at construction/land disturbance sites.
  - 1. The ordinance or regulatory mechanism shall include sanctions which are designed to ensure compliance, to the extent allowable under state, or local law.
  - 2. The SWMP must contain a copy of or a link to the relevant ordinance or regulatory mechanism.

A statement in the SWMP should be included here indicating whether the permittee has an ordinance in place to require construction site operators to implement erosion and sediment control BMPs at construction/land disturbance sites. If so, the SWMP should include either a copy of the ordinance as an appendix item, a link to the ordinance on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the ordinance.

For newly designated MS4s, if the permittee's ordinance is still under development, a statement in the SWMP should be included that explains the ordinance is still under development along a schedule of when the ordinance is expected to be adopted.

EXAMPLE: The City has a completed Land Disturbance Construction Ordinance in place. The ordinance is accessible on the City's website (link here). The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Land Disturbance Construction Ordinance in place. A copy of the ordinance is attached to the SWMP as Appendix B. The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Land Disturbance Construction Ordinance in place. The relevant excerpts of the ordinance to address the permit requirements are included below. The ordinance is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's Land Disturbance Construction Ordinance is currently under development. The expected completion date of the ordinance is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the ordinance is adopted, it will be made available to view on the City's website (link here). The ordinance will be reviewed annually and updates will be made as needed.

- **4.4.B** The permittee shall maintain requirements for construction site operators to:
  - 1. Implement appropriate erosion and sediment control best management practices; and

2. Control waste 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.

The simplest way to address this permit requirement is to include a concise summary of the details of the permittee's plan for construction site operators to implement appropriate erosion and sediment control best management practices and control waste 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. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's plan. The more specific detail, the better. If the permittee utilizes an SOP, the SOP may be included by web link, appendix, or relevant excerpt to satisfy this permit requirement.

An alternative option is if the permittee issues its own permit for construction sites that either include requirements for the elements in this permit requirement in the permit, or the permittee requires a Stormwater Pollution Prevention Plan (SWPPP) which includes requirements for the elements in this permit requirement. If the permittee utilizes either of these options, the SWMP should reference the appropriate option utilized, include a copy of it in the SWMP by either web link or appendix, and include a brief summary in the SWMP narrative explaining how either the permit or the SWPPP requirement satisfies the permit requirement.

EXAMPLE: The City utilizes an SOP for construction site operators to ensure construction sites are managed appropriately. The City's SOP requires inspection of construction sites based on priority with a minimum of 3 inspections during the life of the project. The City's SOP includes the issuance of a City-issued construction permit that includes a requirement for construction site operators to develop and maintain a Stormwater Pollution Prevention Plan (SWPPP) for the site throughout the life of the project or active construction activity on the site. The permit requires that the SWPPP for the site include details on appropriate installation, implementation, and maintenance of all BMPs used on the site for the life of the project, as well as details on controlling construction site waste, including, but not limited to discarded building materials, concrete truck washout, chemicals, trash/litter, and sanitary waste. The SOP and construction site permit are accessible on the City's website (link here). The SOP and construction site permit are reviewed annually and updates are made as needed.

**4.4.C** The permittee shall maintain and apply procedures for review of all pre-construction site plans for consideration of potential water quality impacts.

This is another permit requirement where an SOP is helpful and convenient. If an SOP is in place for the permittee's procedures for review of all pre-construction site plans for consideration of potential water quality impacts, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which details the permittee's plan for maintaining and applying procedures for review of all pre-construction site plans for consideration of potential water quality impacts. The SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts

of the relevant parts of the SOP. Ensure that the SOP includes all of all of the applicable details listed in the permit requirement.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's plan to maintain and apply procedures for review of all pre-construction site plans for consideration of potential water quality impacts. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's plan to maintain and apply procedures for review of all pre-construction site plans for consideration of potential water quality impacts and any other practices that are a part of the permittee's plan. The more specific detail, the better.

EXAMPLE: The City has an SOP in place for maintaining and applying procedures for review of all pre-construction site plans for consideration of potential water quality impacts. The SOP is accessible on the City's website (link here). The SOP is reviewed annually and updates are made as needed.

OR

The City has an SOP in place for maintaining and applying procedures for review of all preconstruction site plans for consideration of potential water quality impacts. A copy of the SOP is attached to the SWMP as Appendix B. The SOP is reviewed annually and updates are made as needed.

OR

The City has an SOP in place for maintaining and applying procedures for review of all preconstruction site plans for consideration of potential water quality impacts. The relevant excerpts of the SOP to address the permit requirements are included below. The SOP is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's plan for maintaining and applying procedures for review of all pre-construction site plans for consideration of potential water quality impacts is currently under development. The expected completion date of the plan is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the plan is finalized, it will be made available to view as an SOP on the City's website (link here). The SOP will be reviewed annually and updates will be made as needed.

OR

Insert a detailed summary of the permittee's plan here. Please note that the plan must be described in clear, specific detail. The more specific detail the better. A good rule of thumb to use when including the description of any plan in the SWMP is if someone with no knowledge of your MS4 Program or this particular plan can read the plan and know exactly what to do and how to do it to effectively execute the plan, then you've included enough detail. If someone were

to read the plan and was left with questions on how to execute the plan, the plan does not include enough detail.

## **4.4.D** The permittee shall maintain and apply mechanisms for receipt and consideration of information submitted by the public.

The simplest way to address this permit requirement is to include a concise summary of the details of the permittee's mechanisms used for receipt and consideration of information submitted by the public regarding construction or land disturbance sites or projects. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's plan. The more specific detail, the better. Detail should include if the permittee utilizes a web based comment submission system, or a physical dropbox and location for comments from the public. Details should also include how the permittee advertises the availability of these modes of comment submission to the public. If the permittee utilizes an SOP, the SOP may be included by web link, appendix, or relevant excerpt to satisfy this permit requirement.

EXAMPLE: The City utilizes a physical drop box submission system and an electronic submission system for the public to submit concerns, complaints, or comments on any construction projects. The physical drop box is located at the front desk of city hall and identified with a sign indicating the box is for submission of construction project concerns. The electronic submission system is located on the City's stormwater web page on the side bar of the home page with a link stating "Do you have a concern about a construction project in the City? If so, submit your concern here." The City also advertises these submission methods in permit-required construction site signage posted in clear view of the public at the entry of the site. The City also has an SOP in place for review and consideration of all environmental concerns, complaints, or comments received by the public which includes deadlines of review of each submission within 24 hours of receipt, and investigative response to submission, if deemed necessary, within 48 hours of submission (72 hours if submission occurred over a weekend or holiday). The SOP also requires follow up response to submitter if submitter requests to be contacted on submission form within 24 hours of completing review/consideration and/or investigation if necessary.

- **4.4.E** The permittee shall maintain and apply procedures for site inspection and enforcement of control measures, this shall include prioritization of site inspection processes; AND
- **4.4.F** The permittee shall inspect (or require inspection of) any structure that functions to prevent pollution of stormwater or to remove pollutants from stormwater and ensure that all BMPs are implemented and effective. This shall include a monitoring plan and\or documentation with implementation schedules described in the SWMP.

Permit requirements 4.4.E and 4.4.F can be addressed under the same section in the SWMP. If the permittee wishes to address 4.4.E and 4.4.F separately, this is fine as long as all elements included in the permit requirement are detailed under the specific permit requirement in the SWMP to ensure all detail is clearly referenced.

The simplest way to address this permit requirement is to include a concise summary of the details of the permittee's procedures for site inspection and enforcement of control measures, including details on prioritization of site inspection processes. The summary should also include details on how the BMPs on site are inspected to ensure all are implemented and effective. The schedule of the inspections must also be included for this permit requirement to be considered sufficient. If the permittee utilizes an inspection checklist or report form, this is a great place to reference it and include a link to it if it's available online or as an appendix item.

Be sure to include how you determine prioritization of site inspection! This is a detail left out of many SWMPs. This can be addressed very simply. Just describe in your summary factors that are taken into consideration during the plan review and inspection process that would make a site a higher or lower priority for inspection. Examples of these factors may include the site's topography, a history of problems with compliance from the developer or contractors working on the site, or if the site is a sensitive subject or contentious amongst the public/media.

The summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's inspection plan. An inspection report or checklist can help you achieve this, but referencing an inspection report or checklist alone without a corresponding narrative in the SWMP that summarized the purpose of the inspection report or checklist will not be considered sufficient. Remember, the more specific detail, the better.

EXAMPLE: The City utilizes an SOP and inspection report for site inspections and enforcement control measures. The City's SOP is accessible on the City's website (link here). The SOP covers the City's inspection report, inspection schedule, site prioritization factors, BMP implementation and effectiveness evaluation, and references the City's Land Disturbance and Sediment Control ordinance for enforcement control measures. A copy of the City's inspection report is attached to the SWMP as Appendix B. The SOP is reviewed annually and updates are made as needed Please note that if you are referencing an SOP in the narrative of your SWMP, you must ensure the SOP clearly addresses all elements of the permit requirement. If the SOP does not cover all the elements, you must include them in the narrative for the corresponding permit requirement in your SWMP.

**4.4.G** The permittee shall maintain and apply a plan designed to ensure compliance with the permittee's erosion and sediment control regulatory mechanism, this shall include the sanctions and enforcement mechanisms to be used to ensure compliance.

Most permittee's reference their ordinance to address this permit requirement. As long as the ordinance has a clearly described enforcement section that details the progression of enforcement actions to ensure compliance, this is acceptable.

The simplest way to address this permit requirement is to include a brief summary in the SWMP to inform the reader that the permittee utilizes their ordinance to address this permit requirement. The summary should include the link to the specific section of the ordinance, or if a link to the specific section is not possible, a reference or references to the specific section(s) should be provided in the SWMP.

EXAMPLE: The City's Land Disturbance and Sediment Control ordinance includes an enforcement process, which includes sanctions, fines, and progressive enforcement actions, to ensure compliance. The ordinance is accessible on the City's website (link here). The enforcement process is reviewed annually along with the rest of the ordinance and updates are made as needed.

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## MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment

The permittee shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that would disturb one acre or more, and that discharge into the permittee's regulated MS4.

- **4.5.A** The permittee shall develop, and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for the community, including, but not limited to the assessment of site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance. The goal of this approach is to arrive at designs that protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions.
  - 1. Details of these strategies to minimize water quality impacts shall be included in the SWMP.
  - 2. The SWMP shall include a link to or copy of standards developed or adopted.

This is another permit requirement where an ordinance that includes this detail or an SOP is helpful and convenient. If an ordinance or SOP is in place for the permittee's strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions, a statement in the SWMP should be included here indicating that the permittee has an ordinance or SOP in place which details the permittee's strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions. The SWMP should include either a copy of the ordinance or SOP as an appendix item, a link to the ordinance or SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the ordinance or SOP. Ensure that the ordinance or SOP includes all of the applicable elements listed in the permit requirement – this includes details on structural and/or non-structural best management practices (BMPs) utilized including the assessment of site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance.

If the permittee has an ordinance (for newly designated MS4s only) or SOP under development, a statement in the SWMP should be included that explains the ordinance or SOP is under development along a schedule of when the SOP is expected to be adopted or completed.

If the permittee does not have an ordinance or SOP in place (whether an ordinance or SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively

remove stormwater pollution, and attempt to maintain predevelopment runoff conditions. The more specific detail, the better.

An alternative option is to consider adopting standards or manuals from other MS4 in compliance with standards or organizations like APWA or MARC. If the permittee chooses to adopt rather than create their own unique strategies, the SWMP must still include a statement describing what they've adopted and why and how it will fit into their program.

EXAMPLE: The City has an ordinance SOP in place of strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions. The ordinance or SOP is accessible on the City's website (link here). The ordinance or SOP is reviewed annually and updates are made as needed.

OR

The City has an ordinance or SOP in place of strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions. A copy of the ordinance or SOP is attached to the SWMP as Appendix B. The ordinance or SOP is reviewed annually and updates are made as needed.

OR

The City has an ordinance or SOP in place of strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions. The relevant excerpts of the ordinance or SOP to address the permit requirements are included below. The ordinance or SOP is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's strategies to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions is currently under development. The expected completion date of the plan is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the plan is finalized, it will be made available to view as an ordinance or SOP on the City's website (link here). The ordinance or SOP will be reviewed annually and updates will be made as needed.

OR

Insert a detailed summary of the permittee's strategies here. Please note that the strategies must be described in clear, specific detail. The more specific detail the better. A good rule of thumb to use when including the description of any plan, procedures, strategies, etc. in the SWMP is if someone with no knowledge of your MS4 Program or these particular details can read them and know exactly what to do and how to do it to effectively execute them, then you've included enough detail. If someone were to read the plan, procedures, strategies, etc. and were left with questions on how to execute them, not enough detail is included.

**4.5.B** To the extent allowable under state, or local law, through ordinance, or other regulatory mechanism, the permittee's Stormwater Management Program shall address post-construction runoff from new development and redevelopment projects. The regulatory mechanism the permittee will use shall be identified in the SWMP by including a link to or a copy of the

ordinance(s) or regulatory mechanism(s). If the permittee needs to develop a mechanism, the schedule for implementation shall be described in the SWMP.

A statement in the SWMP should be included here indicating whether the permittee has an ordinance in place to address post-construction runoff from new development and redevelopment projects. If so, the SWMP should include either a copy of the ordinance as an appendix item, a link to the ordinance on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the ordinance.

For newly designated MS4s, if the permittee's ordinance is still under development, a statement in the SWMP should be included that explains the ordinance is still under development along a schedule of when the ordinance is expected to be adopted.

EXAMPLE: The City has a completed Post-Construction Ordinance in place. The ordinance is accessible on the City's website (link here). The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Post-Construction Ordinance in place. A copy of the ordinance is attached to the SWMP as Appendix B. The ordinance is reviewed annually and updates are made as needed.

OR

The City has a completed Post-Construction Ordinance in place. The relevant excerpts of the ordinance to address the permit requirements are included below. The ordinance is reviewed annually and updates are made as needed.

OR

The City is a newly designated MS4. The City's Post-Construction Ordinance is currently under development. The expected completion date of the ordinance is currently December 31, 2021. Any changes to this date will be noted in the City's Annual Report. Once the ordinance is adopted, it will be made available to view on the City's website (link here). The ordinance will be reviewed annually and updates will be made as needed.

- **4.5.**C The permittee shall maintain a plan to ensure adequate long-term operation and maintenance of Post-Construction BMPs, both structural and non-structural. Descriptions of and/or examples of agreements between the permittee and other parties such as post-development landowners or regional authorities shall be included in the SWMP.
- **4.5.D** The permittee shall maintain and apply an inspection plan with implementation schedules for post-construction BMPs.
- **4.5.**E The permittee shall inspect or require the inspection of post-construction stormwater BMPs to ensure all BMPs are implemented and effective.

Most permittee's reference their ordinance to address permit requirements 4.5.C, 4.5.D, and 4.5.E. As long as the ordinance has a clearly described section dedicated to the long-term operation and maintenance of Post-Construction BMPs and the inspection plan and

implementation schedule to ensure all BMPs are implemented and effective, this is acceptable.

The simplest way to address this permit requirement is to include a brief summary in the SWMP to inform the reader that the permittee utilizes their ordinance to address this permit requirement. The summary should include the link to the specific section of the ordinance, or if a link to the specific section is not possible, a reference or references to the specific section(s) should be provided in the SWMP. The summary in the SWMP should also include details on structural and non-structural BMPs utilized and descriptions of and/or examples of agreements between the permittee and other parties such as post-development landowners or regional authorities; a brief description of the inspection plan to ensure all post-construction BMPs are implemented and effective.

If the permittee does not have an ordinance that includes well described details to address all elements in permit requirements 4.5.C, 4.5.D, and 4.5.E, a separate narrative in the SWMP must be included to fill in the details not covered in the permittee's ordinance or regulatory mechanism.

EXAMPLE: The City's Post-Construction ordinance includes a specific section (section here) dedicated to the long-term maintenance of Post-Construction BMPs. The ordinance also details the City's inspection plan and implementation schedule of post-construction BMPs to ensure all BMPs are implemented and effective (section here). The ordinance is accessible on the City's website (link here). The enforcement process is reviewed annually along with the rest of the ordinance and updates are made as needed.

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### MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

The permittee shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

- **4.6.A** An employee training program for municipal operations staff who work with material handling, at municipal vehicle or equipment maintenance areas, storage yards, and material storage facilities. The training shall be used to prevent and reduce stormwater pollution from activities such as, but not limited to, park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. The SWMP shall include:
  - 1. A description of any existing, available training material the permittee plans to use such as those available from EPA, the state, or other organizations. Include the frequency of training and topics covered.
  - 2. A description of how this training will coordinate with all other MCMs.
  - 3. A description of how this training will coordinate with monitoring, integrated planning, and TMDL implementations where applicable.

If the permittee has an SOP, O&M manual, or alternative training program document for their employee training program for municipal operations staff, referencing the SOP, O&M manual, or training program document here is helpful, but the permittee must be sure the SOP, O&M manual, or training program document includes all the elements of the permit requirement. If elements are missing from the SOP, O&M manual, or training program document, they must be added into the SWMP narrative. The SWMP should include either a copy of the SOP, O&M manual, or training program document as an appendix item, a link to the SOP, O&M manual, or training program document on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP, O&M manual, or training program document.

If the permittee does not have an SOP, O&M manual, or training program document to reference, the SWMP must include a detailed description of the permittee's employee training program for municipal operations staff. The description must include all the elements of the permit requirement including **how the training will coordinate with all other MCMs**. This is a common element missed in SWMPs and must be clearly identifiable in the SWMP to be considered sufficient. If monitoring, integrated planning, or TMDL implementations are not applicable for your MS4, this element should not be left out. Rather, for clarity, a statement should be included in the SWMP indicating monitoring, integrated planning, or TMDL implementations are not applicable for the permittee.

EXAMPLE: The City has a training program for all municipal operations staff. The City utilizes MARC training materials on proper management of municipal vehicle and equipment maintenance areas and storage yards; proper land disturbance site management; long-term BMP maintenance; and proper material handling at storage facilities. Trainings are conducted for each new hire, and annual refreshers for each applicable department. If an employee misses their annual training, a make-up training date is scheduled.

*The City's training program coordinates with all other MCMs as follows:* 

- MCM #1 by providing education/training to municipal staff; this in itself satisfies how the training program coordinates with MCM #1;
- *MCM #2 by municipal staff participating in the training, this satisfies MCM#2;*
- MCM #3 teaching staff how to recognize, address, and prevent illicit discharges;
- *MCM #4 educating inspection staff on proper land disturbance site management;*
- MCM #5 educating inspection staff on the importance of post-construction BMPs and long-term maintenance of the BMPs; and
- MCM #6 educating/training municipal staff on good housekeeping practices at municipal facilities

Monitoring, integrated planning, or TMDL implementations are not applicable at this time; however, if monitoring, integrated planning, or TMDL implementations become applicable, descriptions of how the City's training program will coordinate with them will be incorporated into the SWMP and noted in the City's annual report. The City's training program is reviewed annually and modified as new, updated material becomes available or as the needs of the City change.

**4.6.B** The permittee shall maintain an updated list of all municipal operations/facilities that are impacted by this operation and maintenance program.

The simplest way to address this permit requirement is to include a brief narrative of the types of municipal operations/facilities impacted by the permittee's operations and maintenance program followed by a list of all municipal operations/facilities impacted by the permittee's operations and maintenance program. If the permittee does not have any municipal operations/facilities impacted by the permittee's operations and maintenance program, a statement should be included in the SWMP stating the permittee does not have any municipal operations/facilities impacted by the permittee's operations and maintenance program.

EXAMPLE: The City has three City-owned and operated municipal facilities impacted by the City's operation and maintenance program. The facility's include:

Municipal Operation vehicle maintenance and fueling site – 2000 E. Main Street

Municipal salt storage site – 101 Pine Street

Municipal Parks – Jones Park, Christian Park, and Ellis Park

*The City's list of facilities is reviewed annually and updated as needed.* 

**4.6.C** The permittee shall maintain an updated list of industrial facilities that the permittee owns or operates that are subject to NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the permittee's MS4. The permittee shall include the permit number or a copy of the No Exposure Exemption Certification (if applicable) for each facility in the SWMP. NPDES permitted facilities not owned or operated by the permittee are not required to be part of the list, however the permittee should be familiar with all such facilities in their MS4 service area as they may signify a priority area for the IDDE (MCM #3) program.

The simplest way to address this permit requirement is to include a brief narrative of the industrial facilities that the permittee owns or operates that are subject to NPDES permits for

discharges of stormwater associated with industrial activity that ultimately discharge to the permittee's MS4 followed by a list of all industrial facilities the permittee owns or operates that are subject to NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the permittee's MS4. If the permittee does not have any industrial facilities the permittee owns or operates that are subject to NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the permittee's MS4, a statement should be included in the SWMP stating the permittee does not have any industrial facilities that the permittee owns or operates that are subject to NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the permittee's MS4.

EXAMPLE: The City has one City-owned and operated municipal facilities subject to a NPDES permit. The facility is:

City Regional Airport – 1 Runway Drive (MO-R80F000)

The City does not have any owned and operated No Exposure facilities. The City's list of facilities is reviewed annually and updated as needed.

**4.6.D** The permittee shall develop or maintain controls for reducing or eliminating the discharge of floatables and pollutants from municipal parking lots, maintenance and storage yards, waste transfer station, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas owned or operated by the permittee, or other locations expected to contribute floatables and/or pollutants.

This is another permit requirement where an SOP is helpful and convenient. If an SOP is in place for the permittee's controls for reducing or eliminating the discharge of floatables and pollutants from municipal parking lots, maintenance and storage yards, waste transfer station, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas owned or operated by the permittee, or other locations expected to contribute floatables and/or pollutants, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which addresses this permit requirement. The SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's controls for reducing or eliminating the discharge of floatables and pollutants from municipal parking lots, maintenance and storage yards, waste transfer station, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas owned or operated by the permittee, or other locations expected to contribute floatables and/or pollutants. To sufficiently address this permit

requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's controls. The more specific detail, the better.

# **4.6.E** The permittee shall maintain and apply maintenance procedures, maintenance schedules, and long-term inspection schedules for controls to reduce floatables and other pollutants to the permittee's regulated MS4.

This is another permit requirement where an SOP is helpful and convenient. If an SOP is in place for the permittee's maintenance procedures, maintenance schedules, and long-term inspection schedules for controls to reduce floatables and other pollutants to the permittee's regulated MS4, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which addresses this permit requirement. The SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's maintenance procedures, maintenance schedules, and long-term inspection schedules for controls to reduce floatables and other pollutants to the permittee's regulated MS4. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's controls. The more specific detail, the better.

# **4.6.F** The permittee shall utilize procedures for the proper disposal of waste removed from the separate storm sewers and areas of jurisdiction, including dredged material, accumulated sediments, floatables and other debris.

This is another permit requirement where an SOP is helpful and convenient. If an SOP is in place for the permittee's procedures for the proper disposal of waste removed from the separate storm sewers and areas of jurisdiction, including dredged material, accumulated sediments, floatables and other debris, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which addresses this permit requirement. The SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's procedures for the proper disposal of waste removed from the separate storm sewers and areas of jurisdiction, including dredged material, accumulated sediments, floatables and other debris. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's controls. The more specific detail, the better.

## **4.6.G** The permittee shall utilize procedures for the washing of municipal vehicles and equipment.

- 1. Use of any soap or detergent shall only be where there is connection to sanitary sewer or equivalent; and
- 2. Any wash water that contains pollutants such as salt, oils, grease, sediment, grass clippings, lawn chemicals, or pesticides shall not be discharged to waters of the state or the MS4 system without appropriate treatment to ensure the discharged effluent is in compliance with Missouri Water Quality Standards.

This is another permit requirement where an SOP is helpful and convenient. If an SOP is in place for the permittee's procedures for the washing of municipal vehicles and equipment, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which addresses this permit requirement. The SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's procedures for the washing of municipal vehicles and equipment. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's controls. The more specific detail, the better. **Ensure that the SOP or summary includes all of the applicable elements listed in the permit requirement – this includes details on the proper disposal of soap or detergent wash water and wash water that contains the pollutants listed in the permit requirement.** 

- **4.6.H** All paints, solvents, petroleum products and petroleum waste products (except fuels) under the control of the permittee shall be stored so that these materials are not exposed to stormwater.
  - 1. Sufficient practices of spill prevention, control, and/or management shall be provided to prevent any spill of these pollutants from entering waters of the state.

2. Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater.

This is another permit requirement where an SOP is helpful and convenient. If an SOP is in place for the permittee's procedures for the handling and storage of paints, solvents, petroleum products and petroleum waste products, a statement in the SWMP should be included here indicating that the permittee has an SOP in place which addresses this permit requirement. The SWMP should include either a copy of the SOP as an appendix item, a link to the SOP on the permittee's website if available, or the SWMP should include excerpts of the relevant parts of the SOP.

If the permittee has an SOP under development, a statement in the SWMP should be included that explains the SOP is under development along a schedule of when the SOP is expected to be completed.

If the permittee does not have an SOP in place (whether an SOP is under development or not), the details to address this permit requirement still needs to be included in the SWMP. If this is the case for your MS4, the simplest way to address this permit requirement is to include a concise summary of the details of the permittee's procedures for the handling and storage of paints, solvents, petroleum products and petroleum waste products. To sufficiently address this permit requirement, the summary in the SWMP must include clear, specific (not generalized or vague) details describing the permittee's controls. The more specific detail, the better. Ensure that the SOP or summary includes all of the applicable elements listed in the permit requirement – this includes details on sufficient practices for spill prevention, control, and/or management and the materials used to construct containment systems.

**4.6.I** If the permittee has new flood management projects (projects developed or designed to reduce flooding), the permittee shall utilize procedures to assess all flood management projects for impacts of water quality, incorporating water quality protection devices or practices.

For clarity, this permit requirement must be included in the SWMP whether your MS4 has new flood management projects or not. If your MS4 does not have new flood management projects, your SWMP simply needs to state under this permit requirement that the permittee does not have new flood management projects. If the permittee does have new flood management projects, then the SWMP will need to include the additional detail to address the permit requirement.

The simplest way to address this permit requirement is to start this entry in the SWMP with a statement indicating whether or not the permittee has new flood management projects, then if applicable, follow that statement with a brief description of the permittee's procedures to assess all flood management projects for impacts of water quality, incorporating water quality protection devices or practices.

## **APPENDICES**

## **Appendix A**

### Measureable Goals SPREADSHEET FORMAT:

Please note, the guidance language in grey text in the top row of MCM #1 in the spreadsheet applies to all subsequent rows' BMPs in the spreadsheet. Additional grey text guidance notes are also given where applicable. Also, please note that only one placeholder for a BMP is listed per permit requirement. The permittee may choose to add multiple BMPs under one permit requirement. Please number accordingly.

#### EXAMPLE:

(Please see below. Zoom in document for detail. For the complete version of the spreadsheet (includes all MCMs), please send a request to MS4@dnr.mo.gov.)

Permit Requirement	Permit Section		BMP Description	BMP Purpose	Responsible Person (optional - only if	Goal/Expected Result of BMP	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	BMP Evaluation	BMP Success/ Modification			
Identifying target audiences of significant pollution	MCM1 4.1.A	1	(What is the BMP? Be sure the description of the BMP is clear.)	(What is the purpose of the BMP? What is the point? What makes this BMP suitable for your MS4 and target audiences?)	multiple people on MS4 team)  (Make sure the RP is listed at the beginning of the SWMP too.)	(What do you expect to see out of this BMP? Behavioral or environmental change? Increased public involvement? Decreased pollutants? Etc.)	Permit Year 1  [What is your goal for year 1? Do you have a milestone to complete? Do you have a deadline? Use percentages, numbers, increasing or decreasing trends where possible.)	Permit Year 2  [What is your goal for year 2? Do you have a milestone to complete? Do you have a deadline? Use percentages, numbers, increasing or decreasing trends where possible.)	Permit Year 3  [What is your goal for year 3? Do you have a milestone to complete? Do you have a deadline? Use percentages, numbers, increasing or decreasing trends where possible.]	Permit Year 4  [What is your goal for year 4? Do you have a milestone to complete? Do you have a deadline? Use percentages, numbers, increasing or decreasing trends where possible.)	Permit Year S  (What is your goal for year 5? Do you have a milestone to complete? Do you have a deadline? Use percentages, increasing or decreasing trends where possible.)	(Criteria you look at during BMP evaluation to ensure goals are met - What you must see to determine if BMP is successful or not.)	(Use this for data tracking for your annual reports - Does not need to be completed for SWMP. Was the BMP successful or not? What was modified?)
	MCM1 4.1.A	2											
Identifying target pollutants and sources of pollutants related to target audiences	MCM1 4.1.B	3		(Specify how the pollutants/sources relate to the target audiences.)									
Inform target audiences of target pollutants and how they can contribute	MCM1 4.1.C	4		(Specify how the BMPs inform and educate target audiences to reduce pollutants in stormwater runoff.)									
	MCM1 4.1.C	5											
Provide public notice period for public to review/comment on SWMP (includes public notice of public meeting)	MCM2 4.2.A, 4.2.B	1					(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)		
Provide public meeting for public to review SWMP and application and voice comments.	MCM2 4.2.B	2					(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)	(Only necessary for significant changes to the SMWP or during permit renewal.)		
Provide publicly available method to accept comments from public.	MCM2 4.2.C	w											
Stormwater Management Committee - provide opportunities for citizen representatives	MCM2 4.2.D	4											
Maintain storm sewer system map	MCM3 4.3.A	1											
Illicit Discharge Ordinance	MCM3 4.3.B	2											
Plan to detect and address unauthorized non- storm water discharges	MCM3 4.3.C	3											
	MCM3 4.3.C	4											