



**Minnesota Pollution Control Agency**  
 520 Lafayette Road North  
 St. Paul, MN 55155-4194

# MS4 SWPPP Application for Reauthorization

**for the NPDES/SDS General Small Municipal Separate Storm Sewer System (MS4) Permit MNR040000 reissued with an effective date of August 1, 2013**  
 Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

**Instructions:** This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

**Submittal:** This MS4 SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at [ms4permitprogram.pca@state.mn.us](mailto:ms4permitprogram.pca@state.mn.us) from the person that is duly authorized to certify this form. All questions with an asterisk (\*) are required fields. All applications will be returned if required fields are not completed.

**Questions:** Contact Claudia Hochstein at 651-757-2881 or [claudia.hochstein@state.mn.us](mailto:claudia.hochstein@state.mn.us), Dan Miller at 651-757-2246 or [daniel.miller@state.mn.us](mailto:daniel.miller@state.mn.us), or call toll-free at 800-657-3864.

## General Contact Information (\*Required fields)

### MS4 Owner (with ownership or operational responsibility, or control of the MS4)

\*MS4 permittee name: City of Owatonna \*County: Steele  
(city, county, municipality, government agency or other entity)  
 \*Mailing address: 540 West Hills Circle  
 \*City: Owatonna \*State: MN \*Zip code: 55060-4701  
 \*Phone (including area code): (507) 774-4342 \*E-mail: thomas.kuntz@ci.owatonna.mn.us

### MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

\*Last name: Kyle \*First name: Skov  
(department head, MS4 coordinator, consultant, etc.)  
 \*Title: Public Works Director/City Engineer  
 \*Mailing address: 540 West Hills Circle  
 \*City: Owatonna \*State: MN \*Zip code: 55060-4701  
 \*Phone (including area code): 507-774-4350 \*E-mail: Kyle.Skov@ci.owatonna.mn.us

### Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Knoff First name: Mark  
(department head, MS4 coordinator, consultant, etc.)  
 Title: Consultant  
 Mailing address: Foth Infrastructure & Environment, LLC., Eagle Point II, 8550 Hudson Blvd North, Suite 100  
 City: Lake Elmo State: MN Zip code: 55042  
 Phone (including area code): 507-288-8563 E-mail: mark.knoff@foth.com

## Verification

- I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.).  Yes
- I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit.  Yes

**Certification (All fields are required)**

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- Yes - 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 gathered and evaluated the information submitted.

*I certify that 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 civil and criminal penalties.*

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Thomas A. Kuntz  
*(This document has been electronically signed)*

Title: Mayor Date (mm/dd/yyyy): 01/22/14

Mailing address: 540 West Hills Circle

City: Owatonna State: MN Zip code: 55060-4701

Phone (including area code): (507) 774-4342 E-mail: thomas.kuntz@ci.owatonna.mn.us

**Note:** *The application will not be processed without certification.*

# Stormwater Pollution Prevention Program Document

## I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere\_Partnerships*.

*There are no formal partnerships with regulated MS4s for the purposes of meeting MCM or other permit requirements. The City plans to leverage strategic partnerships, both public and private, as they become available, to enhance their stormwater pollution prevention program.*

## II. Description of Regulatory Mechanisms: (Part II.D.2)

### Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)?  Yes  No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- Ordinance                       Contract language  
 Policy/Standards                 Permits  
 Rules  
 Other, explain: \_\_\_\_\_

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

*Owatonna City Code 317, Stormwater Management Ordinance*

*Owatonna City Code 317.01, Definitions*

*Owatonna City Code Section 317:06, Stormwater and Urban Runoff Pollution Control.*

*Owatonna City Code Section 317.07, Enforcement, subd.3-5*

*Owatonna City Code Section 278, Sewer Department - Private Wells, Septic Tanks, Cesspools and Privies; Connection to Public Sewer and Water*

*Owatonna City Code Section 1025:85, Removal of Animal Debris*

*Owatonna City Code, Section 1050 Pollution of Stream, Creek, Pond, River*

*Owatonna City CodeSection 1052, Prohibition Regarding Phosphorus Containing Fertilizers*

*Owatonna City CodeSection 1090, Nuisance Ordinance*

Direct link:

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere\_IDDEreg*.

2. If no:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

*The City will review and update our IDDE regulatory mechanism to meet the new requirements of the MS4 general stormwater permit. This effort will be completed within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.*

### Construction site stormwater runoff control

A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls?  Yes  No

1. If yes:

a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Ordinance        | <input type="checkbox"/> Contract language  |
| <input checked="" type="checkbox"/> Policy/Standards | <input checked="" type="checkbox"/> Permits |
| <input checked="" type="checkbox"/> Rules            |   |
| <input type="checkbox"/> Other, explain: _____       |   |

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

*Owatonna City Code Section 317, Stormwater Management Ordinance*

*Owatonna City Code Section 317.01, Definitions*

*Owatonna City Code Section 317.02, Scope and Effect*

*Owatonna City Code Section 317.03, Stormwater Management Plan Application Procedures*

*Owatonna City Code Section 317.04, Stormwater Management Plan Review Procedures*

*Owatonna City Code Section 317.05, Stormwater Management Plan Approval Standards, Subds 1-7, 12-1*

*Owatonna City Code Section 317.07, Enforcement*

*Owatonna City Code Section 317.08, Right of Entry and Inspection*

*Owatonna City Code Section 827, Zoning Ordinance*

Direct link:

*Permit Fees*

*<http://ci.owatonna.mn.us/stormwater/construction-development/permits-fees>*

*Residential Permit and Standards*

*<http://ci.owatonna.mn.us/sites/default/files/documents/2010/03/Single-Family-Residential-Townhome-Grading-ESC-Permit-Application.pdf>*

*<http://ci.owatonna.mn.us/sites/default/files/documents/2010/03/Single-Family-Residential-Townhome-Grading-ESC-Standards.pdf>*

*Commercial Permit and Standards*

*<http://ci.owatonna.mn.us/sites/default/files/documents/2010/03/Commercial-Construction-Stormwater-Management-Application-Non-Form.pdf>*

*<http://ci.owatonna.mn.us/sites/default/files/documents/2010/03/Commercial-Industrial-Grading-ESC-Standards.pdf>*

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming

convention: MS4NameHere\_CSWreg.

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? [ ] Yes [x] No

If you answered yes to the above question, proceed to C.

If you answered no to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City will update the construction site stormwater runoff control regulatory mechanism to be at least as stringent as the MPCA CSW permit. The City will adopt language that complies with the new MS4 permit. This effort will be completed within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.

- C. Answer yes or no to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- 1. Best Management Practices (BMPs) to minimize erosion. [ ] Yes [x] No
2. BMPs to minimize the discharge of sediment and other pollutants. [ ] Yes [x] No
3. BMPs for dewatering activities. [ ] Yes [x] No
4. Site inspections and records of rainfall events [ ] Yes [x] No
5. BMP maintenance [ ] Yes [x] No
6. Management of solid and hazardous wastes on each project site. [ ] Yes [x] No
7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. [ ] Yes [x] No
8. Criteria for the use of temporary sediment basins. [ ] Yes [x] No

If you answered no to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Even though many of these areas are addressed in the current regulatory mechanism, none of areas (C.1. - C.8.) meet the new permit requirements. The City will adopt language that complies with the new MS4 permit. The ordinance amendment will be completed within 12 months of the date permit coverage is extended. Items C1 through C8 will be incorporated into a site plan checklist within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities? [x] Yes [ ] No

1. If yes:

a. Check which type of regulatory mechanism(s) your organization has (check all that apply):

- [x] Ordinance [ ] Contract language
[ ] Policy/Standards [ ] Permits
[ ] Rules
[ ] Other, explain: \_\_\_\_\_

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Owatonna City Code Section 317, Stormwater Management Ordinance

Owatonna City Code Section 317.01, Definitions

Owatonna City Code Section 317.02, Scope and Effect

Owatonna City Code Section 317.03, Stormwater Management Plan Application Procedures

Owatonna City Code Section 317.04, Stormwater Management Plan Review Procedures

Owatonna City Code Section 317.05, Stormwater Management Plan Approval Standards, subds 1-2, 8-11

Owatonna City Code Section 317.07, Enforcement

Direct link:

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere\_PostCSWreg*.

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity.  Yes  No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of:  Yes  No

- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
- 2) Stormwater discharges of Total Suspended Solids (TSS).
- 3) Stormwater discharges of Total Phosphorus (TP).

b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of:  Yes  No

- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
- 2) Stormwater discharges of TSS.
- 3) Stormwater discharges of TP.

3. **Stormwater management limitations and exceptions:**

a. Limitations

1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas:  Yes  No

- a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
- b) Where vehicle fueling and maintenance occur.
- c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
- d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.

2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas:  Yes  No

- a) With predominately Hydrologic Soil Group D (clay) soils.
- b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
- c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
- d) Where soil infiltration rates are more than 8.3 inches per hour.

3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process.  Yes  No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

- a. Mitigation project areas are selected in the following order of preference:  Yes  No
    - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
    - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
    - 3) Locations in the next adjacent DNR catchment area up-stream
    - 4) Locations anywhere within the permittee's jurisdiction.
  - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP.  Yes  No
  - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part.  Yes  No
  - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity.  Yes  No
  - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part.  Yes  No
  - f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e).  Yes  No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance.  Yes  No
  - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party.  Yes  No
  - c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met.  Yes  No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

*B.2. - B.5. The City Code will be updated to include language that addresses these requirements. Ordinance amendments will be developed and implemented within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.*

### III. Enforcement Response Procedures (ERPs): (Part II.D.3)

- A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)?  Yes  No
  - 1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere\_ERPs*.
  - 2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

*The WQS will develop ERPs, using the existing ordinance as a baseline. The ERPs will be implemented within twelve months of the date that permit coverage is extended. The WQS will complete a draft copy of ERPs within six months of the date permit coverage is extended. City staff, from all affected departments, will review the ERPs and make suggested changes to the*

WQS during months six through nine. The WQS will incorporate the changes into the written ERPs during the last three month period. The focus will be on developing documentation as the City has already promulgated an ordinance that compels compliance with the regulatory mechanism.

B. Describe your ERPs:

Section 317 of the Owatonna City Code outlines what constitutes a violation of the ordinance and the actions the City will take to achieve compliance. Section 317.08 establishes the City's right of entry and inspection. If a violation is discovered, the first step in the process is to notify the permit holder of the violation and establishes an allowable time period for the violator to take corrective action. The City may initiate the corrective action, at its discretion, after that time period has expired. In addition to taking corrective action, the City may withhold inspections or the issuance of a certificate of occupancy or revoke any permits perviously issued by the City. The City may seek reimbursement for any corrective actions taken.

The City's ordinance also covers the maintenance, repair or replacement of exisiting private stormwater facilities of a non-critical nature. The procedures outlined in the ordinance allow for appropriate notice of non-compliance. If corrective action is not taken, the City may take the corrective action and assess the owner for any costs incurred.

Any violation of Section 317.0 is considered a public nuisance.(See Owatonna City Code Section 1090.0 Nuisance Ordinance, specifically Section 1090.25 Abatement). Available actions include: (1) Notice of violation; (2) Notice of council hearing; (3) Notice of city council order; and (4) Notice of motion for summary enforcement. In cases of emergency, where delay in abatement required to complete the notice and procedure requirements will permit a continuing nuisance to unreasonably endanger public health, safety, or welfare, the City Council may order summary enforcement and abate the nuisance. The City may take action to abate, without notice or other process, from immediately abating any condition which poses an imminent and serious hazard to human life or safety. Since the offense may be considered a misdemeanor, the City can also seek criminal prosecution.

#### IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

The City of Owatonna maintains an accurate Storm Sewer Map in AutoCad drawing format. This map includes unique identifiers for outfalls. All pipes 12" and larger are included in the map and flow direction is shown. Receiving waters are also shown.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes.  Yes  No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate.  Yes  No
3. Structural stormwater BMPs that are part of the permittee's small MS4.  Yes  No
4. All receiving waters.  Yes  No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The WQS will work with summer seasonal employee(s) to create an inventory of structural stormwater BMPs owned by the City. The information will be gathered during the summer and fall of 2014. Geographic coordinates will be gathered using GPS, via satellite imagery available via the computer or using other means. A unique identifier will be assigned. The inventory will be checked for accuracy by the WQS during the winter of 2014. The information will be passed on to the Engineering Department for inclusion in the maps and database to meet the 12-month deadline.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances.  Yes  No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances.  Yes  No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.



1. A unique identification (ID) number assigned by the permittee.  Yes  No
2. A geographic coordinate.  Yes  No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment.  Yes  No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

*The WQS will work with summer seasonal employee(s) to create an inventory of public and private ponds and wetlands and lakes that collect stormwater via constructed conveyance. The information will be gathered during the summer and fall of 2014. Geographic coordinates will be gathered using GPS or via satellite imagery available via the computer or other means. A unique identifier will be assigned and available information like the National Wetlands Inventory will be used to categorize the feature. Some information cannot be gathered until all outfalls have been located. The inventory will be checked for accuracy by the WQS during the winter of 2014. The information will be passed on to the Engineering Department for inclusion in the maps and database to meet the 12-month deadline.*

- E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA  Yes  No on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere\_inventory.*

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

## V. Minimum Control Measures (MCMs) (Part II.D.5)

### A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

*The City's SWPPP, developed during the last 5-year permit cycle, has an aggressive education and outreach program that identifies target audiences, educational goals and prescribed methods of implementation. Key audiences include: general public, waterfront property owners, building contractors, general site and utility contractors, developers, and businesses. A priority topic for the general public and businesses is illicit discharge. Erosion control and waste management are the priority topics for contractors and developers. Shoreland protection techniques is the priority topic for those individuals that reside on waterfront properties. A variety of media opportunities including brochures/fliers, website, speaker engagements and training sessions are utilized for public education and outreach.*

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

**If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Written Material (e.g. brochures and flyers)	Number of flyers distributed, type of information and target audience. As a minimum, one flyer/brochure will be mailed via the utility bill reaching an estimated 11,000+ utility customers.
Press Releases	Number, topic and type of press release. Goal 2 articles per year.
City Newsletter	Number and topic of article published. Goal 2 articles per year.
Website	Number of hits on City's stormwater website.
Speaking Engagements	Number of presentations made to service groups or other City events, group, date and topic. Goal 1 presentation per year.
Seminars	Topic, target audience, number of attendees. Year 2 – evaluate the use of partnerships to expand the program and consolidate

all types of seminars into one program. Year 3 – Implement the new seminar program if it appears to be more effective than the current programs.

BMP categories to be implemented	Measurable goals and timeframes
----------------------------------	---------------------------------

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

*Water Quality Specialist*

**B. MCM2: Public participation and involvement**

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

*The City holds an annual meeting during January or February to engage the public in the SWPPP improvement process. Thirty days public notice is given prior to the meeting using a press release, notification through utility billing stuffers and the city newsletter. Staff receives both oral and written comments and documents them. The SWPPP is then amended as directed by the Council.*

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA’s *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annual Meeting	Date of meeting and number of attendees. Have at least 10 attendees. Number of times televised on the local public access channel. The number of comments received and responded to through the public process and plan amendments.
Appropriate Public Notice	Provide notice at least thirty (30) days prior to the meeting. Distribute notice to the local newspaper, City newsletter and utility bill flyer. Program improvements: Post on the City’s website starting in Year 2. Maintain copies of notices.
Availability of Stormwater Pollution Plan Document	The City’s plan is available on the City’s website year-round. Program improvements: Year 2 - Copies will be made available at city hall and the library once public notice for the annual meeting has been issued.
Adopt a Rain Garden	Number of people participating in the adopt-a-rain garden program. Goal 2/permit cycle.

BMP categories to be implemented	Measurable goals and timeframes
Documentation	Create procedures for documenting comments received and responses to the City’s SWPPP within twelve months after the date permit coverage is extended.

3. Do you have a process for receiving and documenting citizen input?  Yes  No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

*Create procedures for documenting comments received and responses to the City’s SWPPP within twelve months after the date permit coverage is extended.*

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

*Water Quality Specialist*

**C. MCM 3: Illicit discharge detection and elimination**

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

*The primary focus of the City's IDDE program is mapping the stormwater system and educating the community about the hazards associated with illegal discharges and the improper disposal of waste. The City currently has a program in place to detect and eliminate illicit discharges by educating/training the general public, local businesses and City employees to identify illicit discharges and enforcement via the city ordinance.*

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?
  - a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).  Yes  No
  - b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools.  Yes  No
  - c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation.  Yes  No
  - d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge.  Yes  No
  - e. Procedures for the timely response to known, suspected, and reported illicit discharges.  Yes  No
  - f. Procedures for investigating, locating, and eliminating the source of illicit discharges.  Yes  No
  - g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061.  Yes  No
  - h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s).  Yes  No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

*The City will develop a program that will meet the IDDE requirements of the new general permit. Illicit discharge and enforcement are covered in the City Code, however procedures are need to outline a more formal program implementing the ordinance requirements. The City will develop procedures within twelve months of the date that permit coverage is extended. A draft copy of procedures will be prepared by the Water Quality Specialist (WQS) within six months of the date permit coverage is extended. City staff will review the procedures and make suggested changes to the WQS during months six through nine. The WQS will incorporate the changes into the IDDE program during the last three month period.*

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

**If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Ordinance	Review the illicit discharge and public nuisance ordinances every general permit renewal to ensure that it continues to comply with the MS4 NPDES/SDS General Storm Water Permit. Update ordinance within 12 months permit coverage is extended. Review ordinance annually.
Mapping	Maintain 11X17 map books logging illicit discharges. Number of illicit discharges identified and mapped per year. Inventory of updated maps available to staff in City maintenance vehicles annually. Program improvements: Investigate the feasibility of incorporating into GIS database in Year 2. If feasible, develop GIS-based program in Year 3 and implement in Year 4.
Enforcement	Number of fines levied. Program improvements: Year 1 –

	change from monitoring only fines to documenting number of and type enforcement actions taken IAW ERPs, report annually.
Inspections	Number of inspections conducted, findings, corrective action. Minimum of 20% of municipal outlets will be inspected annually during dry weather conditions. Number of snow storage areas inspected and number of notices sent to owners. Inspect each snow storage area at least once per year.
Training	Provide annual training for all City field staff on the proper identification of illicit discharge and record training sessions for supervisory staff. Document date, number trained and type of training. Program improvements: Year 2 – Develop program for new personnel and seasonal help. Year 3 – Implement new training program.
<b>BMP categories to be implemented</b>	<b>Measurable goals and timeframes</b>
Inspections	Number of high-priority outfalls identified. Number of inspections conducted, findings, corrective action. Inspect and document each high-priority outfall at least once per year. Once identified, minimum annual inspections of high priority outfalls and around high-risk establishments (e.g. fast food restaurants, dumpsters, car washes, mechanic shops). Program improvements: Year 1 & 2 identify priority outfalls. Year 3 – implement high-priority outfall inspection program.
Illicit Discharge Hotline	Number of calls received, response time and response. Report annually. Program improvements: Year 1 - post on the City's website. Allow citizens to dial a number and leave a message 24/7 to report illicit discharges to the City. Investigate using email to allow citizens to report non-compliance issues.

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)?  Yes  No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

*The WQS, using the steps and timetable in C.2 above, will work with the administrative personnel (e.g. City Clerk, IT) to develop a record keeping system that incorporates the documentation requirements of Part III.D.3.h.*

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

*Water Quality Specialist*

#### **D. MCM 4: Construction site stormwater runoff control**

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

*The City has adopted storm water management ordinance that specifically addresses site plan review and sediment and erosion control. Enforcement is accomplished through an inspection program that can levy sanctions as needed. The City has developed residential and commercial standards that are published on their website for contractors. Grading permits and rates are also posted on the website, as well as links to key MPCA documents to comply with the state's stormwater rules and regulations.*

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):

- Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity?  Yes  No
- Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*?  Yes  No
- Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee?  Yes  No
- Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
  - Does your program include procedures for identifying priority sites for inspection?  Yes  No

- 2) Does your program identify a frequency at which you will conduct construction site inspections?  Yes  No
- 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections?  Yes  No
- 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance?  Yes  No
- e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information?  Yes  No
- f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial?  Yes  No
- g. Does your program retain construction site inspection checklists or other written materials used to document site inspections?  Yes  No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

*The WQS will update the current construction site runoff program to meet the requirements of the new general permit. Many of the requirements are covered in the City Code, however the program needs to be modified to incorporate the City's ordinance requirements. The City will develop procedures within twelve months of the date that permit coverage is extended. A draft copy of procedures will be prepared by the WQS within six months of the date permit coverage is extended. City staff, affected by stormwater construction activity, will review the procedures and make suggested changes to the WQS during months six through nine. The WQS will incorporate the changes into the City's stormwater construction program during the last three month period.*

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Ordinance	Review the ordinances after every general permit renewal to ensure that it continues to comply with the MS4 NPDES/SDS General Storm Water Permit. Update ordinance within 12 months permit coverage is extended. Update our city permit and ordinance to meet MPCA General Permit to Discharge Storm Water Associated with Construction Activity. Review ordinance annually.
Education (e.g. seminars and workshops)	Annual seminar for building contractors and developers. Date(s), number of attendees and topics covered. Program improvements: Year 2 – Evaluate the use of partnerships to expand the program and consolidate all types of seminars into one program. Year 3 – Implement the new seminar program if it appears to be more effective than the current programs.
Minimum Structural BMPs	Establish five most effective BMPs for ESC; incorporate into annual seminar. Review and update annually.
Training	Number of personnel trained, training date and topic. Annual training for all building enforcement officials on SWPPP requirements.
Site Plan Review/Checklist	Number of site plan reviews conducted annually. Program improvements: Update the site plan review process and checklist to meet the new permit requirements within 12 months after permit coverage.
Grading Permit	Number of residential and commercial permits issued each year.
Inspections	Number of inspections conducted, findings and corrective action--reported annually.
BMP categories to be implemented	Measurable goals and timeframes
Training	One engineering staff and/or water quality specialist will maintain U of M Extension Erosion and Sediment Installer/Inspector qualification. One will maintain SWPPP design certification. Staff will obtain training/certification within

	two years of hire and receive recurring training.
Hotline	Number of calls, response time and response reported annually. Post hotline number on City's website. Allow citizens to dial a number and leave a message 24/7 to report permit non-compliance issues to the City. Investigate using email to allow citizens to report non-compliance issues.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Water Quality Specialist

**E. MCM 5: Post-construction stormwater management**

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

*The City has adopted a stormwater management ordinance that specifically addressed stormwater runoff from new development and redevelopment in accordance with the old MS4 general NPDES/SDS permit. A stormwater utility was created to help fund the long term operation and maintenance needs of the stormwater system. A database was created that documents the location of all post-construction BMPs. The structures are inspected annually and the results of the inspection are recorded in the database.*

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity?  Yes  No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance?  Yes  No
  - b. All supporting documentation associated with mitigation projects that you authorize?  Yes  No
  - c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))?  Yes  No
  - d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved?  Yes  No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

*The City will develop a post-construction program that will meet the requirements of the new general permit. Many of the requirements are currently covered in the City Code, however a program needs to be developed that better implements the ordinance requirements. The WQS will develop the procedures to be completed within twelve months of the date that permit coverage is extended. The WQS will provide a draft copy of program within six months of the date permit coverage is extended. City staff will review the procedures and make suggested changes to the WQS during months six through nine. The WQS will incorporate the changes into the program during the last three month period.*

*3.b. Public Works staff will work with the Community Development and Engineering Department to develop procedures that document authorized mitigation projects.*

*3.c. Public Works staff will work with the Finance Department to develop SOPs to track payment-in-lieu of other required post-construction activities.*

*3.d. Public Works staff will work with City Administration, Community Development and Engineering Departments and the City Attorney to develop standard language that can be included in the appropriate agreements, contracts and ordinances.*

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Ordinance	Review the ordinances after every general permit renewal to

	ensure that it continues to comply with the MS4 NPDES/SDS General Stormwater Permit. Update ordinance within 12 months permit coverage is extended. Review ordinance annually.
Seminars	Annual seminar with landscape firms, nurseries and realtor association. Date(s), number of attendees, topics covered reported annually. Program improvements: Year 2 – evaluate the use of partnerships to expand the program and consolidate all types of seminars into one program. Year 3 – Implement the new seminar program if it appears to be more effective than the current programs.
BMP Inspections	Number of inspections, findings, corrective action reported annually.
Documentation	Update annually.
Checklist for Site Plan Review	Update procedures for site plan review to meet new stormwater permit requirements and incorporate into a checklist within 12 months permit coverage is extended. Review checklist annually.

BMP categories to be implemented	Measurable goals and timeframes

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

*Water Quality Specialist*

#### F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

*Training is a key component of this MCM. Training covers such areas as illicit discharge, park and open space maintenance, fleet and building maintenance, new construction and land disturbances and storm water system maintenance. Inspection also plays an important role in maintaining the City's extensive stormwater system. All pollution control devices and basins and 20 percent of system outfalls are inspected annually. Inspection results are documented and a summary report is prepared annually.*

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)?  Yes  No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

*The Water Quality Specialist will direct and coordinate the facilities inventory within 12 months after the date permit coverage is extended. During the summer of 2014, staff will work with summer seasonal employee(s) to identify and create an inventory of City facilities that have the potential to contribute pollutants to stormwater discharges. The list of potential sites will be completed by October 2014 and subsequently reviewed by the Water Quality Specialist. After review, the inventory will be given to the Engineering Department to be added to the City's database and map. The inventory and map will be completed within 12 months of the date permit coverage is extended.*

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

**If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Employee Training	Number of employees trained, date and topics covered; reported annually.
Street Sweeping	Hours logged on City sweepers. Tons or cubic yards of debris

	collected. The entire City is swept twice per year, once in the spring and once in the fall.
Structural BMPs	Number of structural BMPs inspected, findings and corrective actions. Inspect stormwater ponds biennially, except those identified as needing more frequent inspections because of maintenance issues or excessive sediment deposition.
Inspections/Corrective Actions/Records	Inspect city-owned stock piles, material storage and material handling areas annually in the spring. Annually develop an implementation plan for corrective measures based on the findings. Document issues that cannot be resolved within one year on the annual report. Implement quarterly inspections during Year 1.
Record Retention	Records will be maintained three years after the permit expires.
<b>BMP categories to be implemented</b>	<b>Measurable goals and timeframes</b>

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)?  Yes  No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330?  Yes  No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13?  Yes  No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources?  Yes  No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)?  Yes  No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas?  Yes  No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality?  Yes  No
- b. Covers the requirements of the permit relevant to the duties of the employee?  Yes  No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements?  Yes  No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))?  Yes  No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

*F.6. The City will develop procedures for determining TSS and TP treatment effectiveness of city-owned ponds used for treatment of stormwater. The City will conduct research in Years 1 and 2, develop a procedures and a schedule in Years 3 through 5. Implement during the next permit cycle.*

*F.7. The City currently meets the pond temporal inspection requirements. An inspection plan and timetable that meets the requirements of Part III.D.6.e (1)-(3) will be developed in Year 1 and implemented in Year 2 of the permit. All ponds, outfalls and BMP structures will be inspected by the expiration date of the permit.*

*F.8. Staff will work with human resources to schedule initial stormwater training for all new employees and seasonal employees where appropriate. Staff develop its training program to meet the new permit requirements. The program will be implemented within 12 months after permit coverage is extended.*



F.9. The City has a documentation system for inspections, maintenance and training. However, the current system does not meet all of the requirements of the new permit. The system will be updated within the 12 months after permit coverage is extended to incorporate the new requirements.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

*Water Quality Specialist*

## VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit?  Yes  No

1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere\_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

## VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)?  Yes  No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere\_TreatmentSystem*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

## VIII. Add any Additional Comments to Describe Your Program