



**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 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, Dan Miller at 651-757-2246 or 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 Lino Lakes *County: Anoka
(city, county, municipality, government agency or other entity)

*Mailing address: 600 Town Center Parkway

*City: Lino Lakes *State: MN *Zip code: 55014

*Phone (including area code): 651-982-2400 *E-mail: tim.payne@ci.lino-lakes.mn.us

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

*Last name: Payne *First name: Tim
(department head, MS4 coordinator, consultant, etc.)

*Title: Streets / Stormwater Supervisor

*Mailing address: 600 Town Center Parkway

*City: Lino Lakes *State: MN *Zip code: 55014

*Phone (including area code): 651-982-2455 *E-mail: tim.payne@ci.lino-lakes.mn.us

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

Last name: Peters First name: Jeff
(department head, MS4 coordinator, consultant, etc.)

Title: WSB & Associates

Mailing address: 701 Xenia Ave South Suite 300

City: Minneapolis State: MN Zip code: 55416

Phone (including area code): (763) 287-7150 E-mail: jpeters@wsbeng.com

Verification

1. 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
2. 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)

- ☒ 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: Michael Grochala
(This document has been electronically signed)

Title: Community Development Director Date (mm/dd/yyyy): 12/30/13

Mailing address: 600 Town Center Parkway

City: Lino Lakes State: MN Zip code: 55014

Phone (including area code): 651-982-2427 E-mail: michael.grochala@ci.lino-lakes.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*.

The city regularly partners with Rice Creek Watershed district on educational events and projects with they are mutually beneficial to both organizations. Rice Creek Watershed District also performs plan reviews for projects that require their permits.

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:

City Code: Chapter 405: Regulation of Discharges into the storm sewer system.

Direct link:

[http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/400waterandsewer/chapter405regulationofdischargesintothes?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:linolakes_mn\\$sanc=JD_Chapter405](http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/400waterandsewer/chapter405regulationofdischargesintothes?f=templates$fn=default.htm$3.0$vid=amlegal:linolakes_mn$sanc=JD_Chapter405)

☐ 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:

City of Lino Lakes will review its current ordinance to insure that it is meeting the requirements of the MS4 permit

within 12 months of permit coverage being granted.

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):

- ☒ 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:

City Code: Chapter 1011: Stormwater and erosion and sediment control

Direct link:

http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/1000landusage/chapter1011

[stormwateranderosionandsedime?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:linolakes_mn\\$anc=JD_Chapter1011](http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/1000landusage/chapter1011stormwateranderosionandsedime?f=templates$fn=default.htm$3.0$vid=amlegal:linolakes_mn$anc=JD_Chapter1011)

- ☐ 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 ☒ 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's construction site stormwater runoff control regulatory mechnaism will be review and updated to be at least as strigent as the MPCA CSW permit. This effort will completed within 12 months of the date permit coverage is extended.

- 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 ☐ No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | ☒ Yes ☐ No |
| 3. BMPs for dewatering activities. | ☐ Yes ☒ No |
| 4. Site inspections and records of rainfall events | ☒ Yes ☐ No |
| 5. BMP maintenance | ☒ Yes ☐ No |
| 6. Management of solid and hazardous wastes on each project site. | ☒ Yes ☐ 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 ☐ No |
| 8. Criteria for the use of temporary sediment basins. | ☒ 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:

C.3. - City will evaluate all mechanisms to enforce dewatering activities and update as necessary within 12 months of reissuance of permit coverage.

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?
☒ 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: Developers Agreements

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:

City Code: 1000: Land Usage, Chapter 1011: Stormwater and erosion and sediment control, Section 1101.09 Stormwater management requirements.

Direct link:

[http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/1000landusage/chapter1011stormwateranderosionandsedime?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:linolakes_mn\\$anc=JD_1011.09](http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/1000landusage/chapter1011stormwateranderosionandsedime?f=templates$fn=default.htm$3.0$vid=amlegal:linolakes_mn$anc=JD_1011.09)

☐ 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.a, B.2.b. Amend current post-construction stormwater ordinance and City Design Standards, which includes goals for reducing post-development TSS and TP loading on an annual basis, to include volume-control and be more consistent with permit language for new and redevelopment sites. The City Engineer will draft these amendments they will be placed on the City Council's meeting agenda for approval within 12 months following the date permit coverage is extended.

B.3.a.1: The City will amend the ordinance and City Design Standards or agreement language, to include prohibiting the use of infiltration techniques for post-construction stormwater management as described in the Permit (PartIII.D.5.a(3)(a).1). The ordinance will be amended on the same schedule as the items in B.2.a and B.2.b.

B.3.a.2: The City will amend the ordinance and City Design Standards to include restricting the use of infiltration techniques for post-construction stormwater management as described in the Permit (PartIII.D.5.a(3)(a).2). This will occur on the same schedule as the items above.

B.3.a.3: The City will amend the ordinance and City Design Standards to include the exceptions for linear projects as described in the Permit (PartIII.D.5.a(3)(b)). This will occur on the same schedule as the items above.

B.4.a.: The City will amend the ordinance and City Design Standards to include order of preference for selecting mitigation project areas as described in the Permit (PartIII.D.5.a(4)(a)). This will occur on the same schedule as the items above.

B.4.b.: The City will amend the ordinance and City Design Standards to include requirements for the creation of mitigation projects as described in the Permit (PartIII.D.5.a(4)(b)). This will occur on the same schedule as the items above.

B.4.c.: The City will amend the ordinance and City Design Standards to include the restriction from using routine maintenance of structural BMPs to meet the requirements for mitigation projects as described in the Permit (PartIII.D.5.a(4)(c)). This will occur on the same schedule as the items above.

B.4.d.: The City will amend the ordinance and City Design Standards to include the requirement to complete mitigation projects within 24 months after the start of the original construction activity as described in the Permit (PartIII.D.5.a(4)(d)). This will occur on the same schedule as the items above.

B.4.f.: The City will amend the ordinance and City Design Standards to mandate that money received from an owner/operator of construction activity, in lieu of meeting the conditions for post-construction stormwater management, shall be used for a public stormwater project as described in the Permit (PartIII.D.5.a(4)(f)). This will occur on the same schedule as the items above.

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:

B. Describe your ERPs:

[http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/1000landusage/chapter1011stormwateranderosionandsedime?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:linolakes_mn\\$anc=JD_1011.13](http://www.amlegal.com/nxt/gateway.dll/Minnesota/linolakes_mn/1000landusage/chapter1011stormwateranderosionandsedime?f=templates$fn=default.htm$3.0$vid=amlegal:linolakes_mn$anc=JD_1011.13)

The City Code includes the following enforcement mechanisms:

- Notice of Violation
- Permit suspension
- Construction stop order
- Permit Revocation
- Remedial Corrective Action
- Action Against Financial Security
- Misdemeanor Violation
- Cumulative Enforcement

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

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

New developments are required to provide electronic as-built data in accordance with the GIS Information Requirements located in the City Design Standard. The City GIS specialist updates and maintains all of the City's GIS Information.

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:

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:

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA 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*. ☐ Yes ☒ No

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 is comprised of a mix of commercial business districts, new development and established residential developments. Therefore the educational focus rotates through residential issues, construction activities, and illicit discharges around commercial business districts. Newsletter distributed to residents includes stormwater section discussing proper practices for activities such as fall yard practices and winter deicing.

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
<i>Education Activity Implementation Plan</i>	<i>Complete outline of education activity implementation program and implementation schedule for the upcoming permit cycle.</i>
<i>Meeting with Building Contractors, Developers, and Excavators</i>	<i>Hold meetings as needed to inform these professionals of stormwater related issues as appropriate.</i>
<i>Meetings with Educational Professionals</i>	<i>Work with Rice Creek Watershed District, and Environmental Commission Group to make effective use of stormwater education programs as appropriate.</i>
<i>City Staff Meetings</i>	<i>Provide a presentation at City Department meetings to generate Staff awareness of SWPPP regulations and to develop projects with appropriate BMPs applied.</i>
<i>Newsletter</i>	<i>Published stormwater pollution prevention related article in the Annual Newsletter to spread awareness of stormwater related issues.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Citizen Survey</i>	<i>Send out a written survey in a random sample of mailings. They survey will gauge each selected household's practices related to the topic that will be featured in the following fall's brochure. This will help the City understand what topics are important to the City. Implementation to be within the next 5 year permit cycle.</i>
<i>Presentations to City Council</i>	<i>Report on yearly NPDES regulations and activities in Annual Report, urban storm water impacts to water bodies, current SWPPP status during an annual presentation each year of permit cycle. Additionally provide a specific review of SWPPP when considering zoning request.</i>

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

Community Development Director / Environmental Coordinator

B. MCM2: Public participation and involvement

- 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:

An opportunity to hear comments on the SWPPP is provided each year during an annual meeting.

- 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
<i>Follow applicable public notice requirement</i>	<i>Provide public notice of meeting to provide input on the SWPPP in accordance with City public hearing notification requirements.</i>
<i>Annual Meeting</i>	<i>Hold annual public meeting combined with City Council Meeting or other public participation/involvement event to solicit public input on the SWPPP</i>
BMP categories to be implemented	Measurable goals and timeframes

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:

B.3. The City will develop written procedures for receiving, documenting and storing citizen input as described in the permit (Part III.C.2.b). Procedures will be in place within 12 months following 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:

Community Development Director / Environmental Coordinator / Streets Supervisor / City Engineer

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 City has an ordinance that prohibits illicit discharges and connections. City Staff and public works employees are trained to look for any signs of an illicit discharge while on the job. City ordinance describes actions the City can take after an illicit discharge has been identified.

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:

C.2.e., The City will incorporate procedures into the IDDE program for a timely response to known, suspected, and reported illicit discharges as described in the permit (Part III.D.3.g). Procedures will be in place within 12 months following the date permit coverage is extended.

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
<i>Storm Sewer System Mapping</i>	<i>The City GIS storm sewer system map is updated as needed to reflect changes made to system features such as ponds, streams, lakes, wetlands, structural pollution control device, pipes, and outfalls. The existing City GIS Map will be updated as required by Part III.C.1 within 12 months following the date permit coverage is extended.</i>
<i>Illicit Discharge Detection and Elimination (IDDE) and Enforcement Ordinance</i>	<i>The City developed an ordinance to prohibit non-stormwater discharge into the stormwater system. The City will review the ordinance yearly to ensure that it continues to meet the needs of the City and legal requirements.</i>
<i>Illicit Discharge Detection and Elimination (IDDE) Program</i>	<i>Program to detect and eliminate illegal and/or improper connections to storm sewer drainage system and receiving waters by maintaining a list of existing illicit connection test performed to date within the City.</i> <i>Maintain a list of illicit connections test performed to date within the City. Identify and prioritize future illicit connection assessment sites, and conduct field testing of existing storm sewer system lines</i> <i>After detection of illicit discharge the City will utilize proper enforcement procedures and enforce the provisions of the City ordinance pertaining to illegal discharges.</i>
<i>Public & Employee IDDE Information Program</i>	<i>Conduct educational seminar and distribute of educational material annually to educate the Public and City Employees about the hazards associated with illicit discharges.</i>
<i>Identification of Non Stormwater Discharges & Flows</i>	<i>City employees are trained how to identify illicit discharges and what corrective measures should be taken for those discharges identified as being significant contributors of pollutants.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>IDDE Program Updates</i>	<i>Update written procedures for illicit discharge inspections, investigations, and response actions. Develop a process to document information as described in the Permit (Part III.3.h) within 12 months following the date permit coverage is extended.</i>
<i>Illicit Discharge Inspections</i>	<i>Annually inspect locations identified as high-priority outfalls and around high-risk establishments (fast food restaurants, dumpster, car washes, mechanics, and oil changes.)</i>
<i>Illicit Discharge Investigation</i>	<i>As needed televise a section of our sewer system, collect grab samples or perform other effective testing procedures to find illicit connection in the system.</i>

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:

C.4., The City will develop written procedures for receiving, documenting and storing citizen input as described in the permit (Part III.D.3.h). Procedures will be in place within 12 months following the date permit coverage is extended.

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

Community Development Director / Environmental Coordinator

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 requires review of construction site erosion and sediment control (ESC) plans before projects begin, and work with contractors to ensure appropriate and correct use of erosion and sediment control BMPs on sites.

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.):

- a. Have you established written procedures for site plan reviews that you conduct prior to the start of ☒ Yes ☐ No

construction activity?

- b. 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
- c. 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
- d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
- 1) 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.

D.2.c., The City will develop written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public as described in the Permit (Part III.D.4.c). Procedures will be in place within 12 months following the date permit coverage is extended.

D.2.d., City will develop written procedures for conducting site ESC inspections as described in the Permit (Part III.D.4.d). Procedures will be in place within 12 months following the date permit coverage is extended.

D.2.g., City will develop written procedures for retaining documents of site ESC inspections as described in the Permit (Part III.D.4.d). Procedures will be in place within 12 months following the date permit coverage is extended.

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
<i>Construction Site Stormwater Runoff Ordinance</i>	<i>Currently being updated and Modified.</i>
<i>Construction Site Plan Review</i>	<i>City Engineering Staff utilizes MPCA the construction and sediment control checklist from Appendix D of the Current SWPPP for review of NPDES Erosion Control Permits submitted to the department for review.</i>
<i>Erosion Protection Maintenance Memo to Builders</i>	<i>An erosion control handout, which explains how to properly install a silt fence and other erosion control BMPs is given to the application when a building permit is picked up.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Permit Update</i>	<i>Update the City Grading, Building, and ROW permits and Construction Site Stormwater Runoff ordinance to meet the new permit requirements within 12 months following the date permit coverage is extended</i>
<i>Prioritize Inspections</i>	<i>Ensure at least 10% of inspections conducted annually are performed at deemed high priority inspection sites (e.g., near sensitive receiving waters, projects larger than 5 acres)</i>
<i>Permit Application System</i>	<i>Develop written procedures to track and archive all plan review and inspection documents within 12 months following the date</i>

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

Community Development Director / Environmental Coordinator

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 a post-construction stormwater management ordinance to require the utilization of BMPs for stormwater runoff from new and redevelopment projects, as well as to ensure the maintenance and operation of the stormwater BMPs.

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.

E.3., The City will develop written procedures for documentation of post-construction stormwater management as described in the Permit (Part III.D.5.c.). Procedures will be in place within 12 months following the date permit coverage is extended.

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
	<i>Rice Creek Watershed District provides engineering staff for review and approval of development proposals that meet Commission requirements. The developers plan must be approved by the WMO and a permit obtained by the City prior to construction. As part of the City permit process, the City ensures that storm water discharges will not adversely affect endangered species, threatened species, historic places, and archeological sites. Staff will continue to work with the Watershed Organizations and their requirements for development proposals throughout the permit cycle.</i>
<i>Site Plan Review Program</i>	
	<i>Implement Stormwater retention/detention ponds as a BMP in areas where it is appropriate</i>
	<i>Developers are encouraged to use infiltration techniques when possible. City and Watershed rules require infiltration for specified events.</i>
<i>Encourage the use of structural and non-structural BMPs during review of new and redevelopment projects</i>	<i>Possible implantation of sand and organic filters into plan review process. This BMP will be review throughout the permit cycle.</i>

<i>Stabilization Seeding</i>	<i>The City requires all exposed ground areas to be landscaped with grass, shrubs, trees, or other living ornamental landscape materials. When observed, the City documents violations of seeding provisions and records types of enforcement actions taken.</i>
<i>Outlet Structure Stabilization</i>	<i>The City requires outlet structure stabilization within the standard specification for construction including but not limited to tie-rods, stabilization seeding, and class IV-V riprap. The City will continue to include this BMP during construction and document the number of structures stabilized.</i>
<i>Land Development Ordinance</i>	<i>Completed ordinance including illicit discharges, erosion and sediment control at construction sites, and post construction runoff from new development and redevelopment</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Update ordinance to meet new permit requirements</i>	<i>Complete Ordinance updates including illicit discharges, erosion and sediment control at construction sites, and post construction runoff from new development and redevelopment Within 12 months of extension of permit coverage.</i>
<i>Develop Written Procedures for Site Plan Review</i>	<i>Develop site plan review procedures that must be completed prior to the start of construction activity within 12 months of extension of permit coverage.</i>
<i>Document Pertinent Project Information</i>	<i>Maintain all related documents pertaining to each new or redevelopment project in more user-friendly filing system for better records management. Implement within 12 months.</i>

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

Street Supervisor / City Engineer

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:

The City currently inspects its structural pollution control devices on an annual basis and inspects all of its outfalls, sediment basins and ponds every 5 years. The City inspects stockpiles, storage and material handling areas at the maintenance yard for potential discharges and maintenance of BMPs. The City is evaluating the use of road salt for winter road maintenance activities to reduce chlorides entering our water resources. The City sweeps streets a minimum of twice per year. Maintenance staff is trained annually on various topics related to pollution prevention during maintenance activities.

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:

Facilities inventory will be completed within 12 months of permit coverage being 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
<i>Park and Open Space Training Program</i>	<i>Training focused on fertilizer application, pesticide/herbicide application, and mowing discharge.</i>

<i>Fleet and Building Maintenance Training Program</i>	<i>Training focused on automotive maintenance program (automotive inspections and washing), spill cleanup training, hazardous materials training, building leak prevention and inspection training. Annual Training.</i>
<i>Stormwater Systems Maintenance Training Program</i>	<i>Training focused on parking lot and street cleaning, storm drain systems cleaning, road salt materials management, annual training</i>
<i>Parking Lots & Street Cleaning</i>	<i>Train employees and document number of times each street is swept annual. Goal is 2 times per year.</i>
<i>Storm Drain Cleaning System</i>	<i>Document Number of Sumps cleaned per year. Goal is 100% of the City sumps per year.</i>
<i>Road Salt Materials Management Program</i>	<i>Document amount of salt applied each year and train employees in road salt management and application rates annually.</i>
<i>Storm Sewer Inspection Program</i>	<i>Conduct one inspection of all City-owned ponds and outfalls prior to expiration date of this permit</i> <i>Annual inspection of 100% of structural pollution control devices</i>
<i>Evaluate Inspection Frequency</i>	<i>Evaluate inspection records and determine if inspection frequency needs to increase or decrease.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Structural Stormwater BMP Maintenance Program</i>	<i>Based on storm sewer inspection findings determine if repair, replacement, or maintenance measures are necessary to ensure structures proper function and treatment effectiveness. Document annually number or structures repaired or scheduled for maintenance.</i>
<i>Spill Prevention & Control Plans for Municipal Facilities</i>	<i>Ensure that plans describing spill prevention and control procedures are consistent among all departments. Conduct annual spill prevention and response training sessions to all municipal employees. Distribute education materials to each municipal facility by the end of year 2.</i>
<i>Maintenance Yard Inspections</i>	<i>Once monthly and after < 1"rain events, perform maintenance yard inspections utilizing a checklist for the inspection. Develop checklist format that allows staff to compare results to previous inspections</i>
<i>Facility Inventory</i>	<i>Update facilities inventory to include potential pollutants as each site. Create a map of all identified facilities.</i>
<i>Pond Assessment Procedures & Schedule</i>	<i>In year 1, develop procedures for determining TSS and TP treatment effectiveness of city owned ponds use for treatment of stormwater. Implement schedule in year 2-5</i>

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)- ☐ Yes ☒ No

(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas?

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.5.c. As part of the regulatory mechanism updates for (II.B.3.a.1) the City will provide a BMP to protect drinking water sources that the MS4 discharges may affect as described in the Permit (Part III.D.6.c). The amended ordinance will be placed on the City Council's meeting agenda for approval within 12 months following the date permit coverage is extended.

F.6. The City will develop a procedure for assessing ponds to determine TSS and TP effectiveness as described in the Permit (Part III.D.6.d) This study will develop procedures for determining TSS and TP treatment effectiveness of city-owned ponds used for treatment of stormwater. A schedule will be implemented in years 2 thru 5.

F.7., The City will develop written procedures for inspection of structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas as described in the Permit (Part III.D.6.f.). Procedures will be in place within 12 months following the date permit coverage is extended.

F.8., The City will develop and implement a stormwater management training program commensurate with each employees job duties as described in the Permit (Part III.D.6.g.). Procedures will be in place within 12 months following the date permit coverage is extended.

F.9., The City will develop written procedures to document inspections, maintenance, and training as described in the Permit (Part III.D.6.h.). Procedures will be in place within 12 months following the date permit coverage is extended.

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

Public Services Director / Street Supervisor / City Engineer

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

