



Minnesota Pollution  
Control Agency

520 Lafayette Road North  
St. Paul, MN 55155-4194

# Example 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

**\*\*\*The information in this example is meant to be just that, an example. Answers will be a composite of different MS4 perspectives (townships, city, university, etc.), and are not meant to be continuous throughout the example SWPPP Document. Cleanwater, MN is a fictional town, and the websites related to Cleanwater in the below application do not exist.\*\*\***

**Note:** Additional instructions are in “red-italicized text” and examples are in “blue text”.

**Instructions:** This is an application example of the *MS4 SWPPP Application for Reauthorization* (SWPPP Document) referencing the 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. The *MS4 SWPPP Application for Reauthorization Example* (SWPPP Document Example) will provide a wide spectrum of ideas that represent examples that may be incorporated into the SWPPP Document. The Minnesota Pollution Control Agency (MPCA) MS4 Permit Program website is: <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.

**\*The MS4 SWPPP Application for Reauthorization, SWPPP Document and applicable attachments must be completed and returned to the MPCA MS4 Permit Program e-mail: [ms4permitprogram.pca@state.mn.us](mailto:ms4permitprogram.pca@state.mn.us).**

**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.

**\*These instructions skip the “General Contact Information,” “Verification,” and “Certification” sections, though all three sections must be completed in the MS4 SWPPP Application for Reauthorization form (wq-strm4-49a) for an application to be processed.**

# Stormwater Pollution Prevention Program Document

*\*Any references to "Permit" will refer to the 2013 MS4 General Permit Authorization to Discharge Stormwater Associated with Small Municipal Separate Storm Sewer Systems under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program with a Permit effective date of August 1, 2013.*

*\*A complete MS4 SWPPP Application for Reauthorization (SWPPP Document) will be placed on public notice for a period of 30 days to provide the public the opportunity to review the permittee's stormwater pollution prevention program document (SWPPP Document) and provide comment on the plan of the permittee to protect and improve water resources. The SWPPP Document shall provide the public necessary information to understand the direction and planned activities of the permittee's Stormwater Pollution Prevention Program over the course of the next permit term.*

*\*If you are not sure whether your answer should be "yes" or "no" in the following questions, then check "no" and explain, in the allotted space, how you are partially meeting the requirement, and how you will ultimately fulfill the entire requirement.*

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

*\*If the permittee enters into a partnership for purposes of meeting SWPPP requirements, the permittee maintains legal responsibility for compliance with this Permit (Part III.D.).*

- 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
Cleanwater River Watershed District; Provides educational material on watershed-friendly lawn practices to citizens of Cleanwater Township. Promotes our annual meeting on their website.	MCMs 1, 2
Cleanwater County; Partner to inspect for illicit discharges. We have a memorandum of understanding with the County that they will implement this effort on behalf of our Township.	MCM 3
City of Riverside; Joint annual meeting for public input on both of our SWPPPs and SWPPP Documents. We also have a contract with them to provide maintenance of streets (snowplowing, etc.), and to perform our construction stormwater inspections.	MCMs 2, 4 & 5

- 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*.

Please refer to our stormwater website, [www.ci.cleanwater.mn.us/cleanwatertownship/stormwater](http://www.ci.cleanwater.mn.us/cleanwatertownship/stormwater), where all of our non MS4 partners are also listed.

## 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):

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

*\*Ordinances are generally filed in City Code with an appropriate reference citation. The SWPPP Document question below requests a citation to city code or an electronic copy (preferably pdf) of the specific ordinance for MCM 3: Illicit Discharge, Detection and Elimination (Part III.D.3.b).*

*\*Policies, Standards and Contract Language may be kept in an internal file with the MS4 permittee and will not likely be filed in Code. The MS4 permittee is expected to submit the policy, standard or contract language as an attachment to the SWPPP Document as referenced below.*

- 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:

[Cleanwater State University Policies>Environmental Management Policies>Stormwater>Illicit Discharges](#)

Direct link:

- ☒ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere\_IDDEreg. (This would be attached as CleanwaterStateU\_IDDEreg.pdf)*

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:

### 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 type="checkbox"/> Policy/Standards      | <input type="checkbox"/> Permits           |
| <input type="checkbox"/> Rules                 |  |
| <input type="checkbox"/> Other, explain: _____ |  |

*\*Ordinances are generally filed in City Code with an appropriate reference citation. The SWPPP Document question below requests a citation to city code or an electronic copy (preferably pdf) of the specific ordinance for MCM 3: Illicit Discharge, Detection and Elimination (Part III.D.3.b).*

*\*Policies, Standards and Contract Language may be kept in an internal file with the MS4 permittee and will not likely be filed in Code. The MS4 permittee is expected to submit the policy, standard or contract language as an attachment to the SWPPP Document as referenced below.*

- 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:

[Cleanwater Township Ordinances: 2007-04](#)

Direct link:

[www.ci.cleanwater.mn.us/cleanwatertownship/twpcodes/2007/04.pdf](http://www.ci.cleanwater.mn.us/cleanwatertownship/twpcodes/2007/04.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 this MS4 Permit)? ☐ Yes ☒ No

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

If you answered **no** to the above permit requirement in 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:

[We will update our construction site stormwater runoff control regulatory mechanism to be at least as stringent as the MPCA CSW permit. This effort will be 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.   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants.  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. BMPs for dewatering activities.   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 4. Site inspections and records of rainfall events   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. BMP maintenance   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site.  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins.  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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. We currently have guidance for dewatering activities, and actively encourage contractors and developers to take proper care. However, it is not part of our official ordinance. We will amend the ordinance to formalize our current actions. The township clerk will work with the City of Cleanwater engineer \(since City of Cleanwater does our construction erosion and sediment control \(ESC\) inspections\) to draft the amendment using language from the MPCA model ESC ordinance as a guideline. Within 3 months following the due date of this application document to the MPCA, there will be a public hearing regarding this amendment and the following amendments related to items \(5\) and \(8\). The amended ordinance will be placed on the township board's meeting agenda for approval within 5 months following the due date of this application document to the MPCA.](#)

[C.5. Amend ordinance to include the requirement that BMP maintenance is conducted by owners and operators of construction activity. The township clerk will draft the amendment, using the EPA's model ordinance as a reference. It will be placed on the township board's meeting agenda for approval within 5 months following the due date of this application document to the MPCA.](#)

[C.8. Following the same procedure as for \(3\) and \(5\), the ordinance will be amended to include criteria for the use of temporary sediment basins.](#)

### 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):

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

*\*Ordinances are generally filed in City Code with an appropriate reference citation. The SWPPP Document question below requests a citation to city code or an electronic copy (preferably pdf) of the specific ordinance for MCM 3: Illicit Discharge, Detection and Elimination (Part III.D.3.b).*

*\*Policies, Standards and Contract Language may be kept in an internal file with the MS4 permittee and will not likely be filed in Code. The MS4 permittee is expected to submit the policy, standard or contract language as an attachment to the SWPPP Document as referenced below.*

- 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:

[Cleanwater City Code, Title 9, Chapter 1145, Section 14](#)

Direct link:

[www.ci.cleanwater.mn.us/citycode/title9/ch1145/sec14.html](http://www.ci.cleanwater.mn.us/citycode/title9/ch1145/sec14.html)

☐ 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 ☐ Yes ☒ No
    - 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:
      - 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:
      - 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, which does not include anything related to volume-control, to incorporate Permit requirements. For this to happen, our City Engineer is working with the Cleanwater River Watershed District for guidance on how to craft an effective ordinance. Cleanwater River Watershed District already has a volume control ordinance in place, so most developers and contractors who apply for a permit from us already have to meet these requirements. The City Engineer will make sure that our ordinance meets the requirements of the Cleanwater River Watershed District, even though they are more stringent than the MPCA

requirements. Beginning in the month of the application due date of this permit to the MPCA, the City Engineer will meet bi-weekly with Cleanwater River Watershed District. Within 3 months of that date, the draft language will be open to a public hearing. If there are any comments, we will respond to them, and send an amended draft to the city council for approval at the first opportunity. If there are no comments, we will send the draft directly to the city council for approval. This process should be completed within 7 months of the due date of this application to the MPCA.

B.3.a.1: Our ordinance currently meets all of these requirements, aside from restricting infiltration practices where vehicle fueling and maintenance occurs. We will amend the ordinance on the same schedule as the items in B.2.a and B.2.b.

B.3.a.3: We will amend the ordinance to include the exceptions for linear projects as elaborated in the Permit (Part III.D.5.a(3)(b)). This will occur on the same schedule as the items above.

B.4.c: Currently, our ordinance contains nothing about whether routine maintenance can be used towards mitigation requirements. On the same schedule as the above items, we will codify the fact that it cannot be used for that purpose.

B.4.e: We will codify on the same schedule, the requirement to identify and document who is responsible for long-term maintenance of mitigation requirements. At the point of codification, we will meet the requirement by having any applicants for a grading permit identify the person who will be responsible for long-term maintenance of mitigation projects. This person's name will be attached to the permit and the records of the project.

B.4.f: Since we have not had volume control requirements before, we haven't had any money paid to us for mitigation projects. We will draft an amendment to include language mandating 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. We will work on this amendment to our current post-construction stormwater ordinance on the same timeline as the items listed above.

B.5.b: The last item that we will include (on the same schedule) in the amendments to our post-construction stormwater ordinance will be language that will ensure maintenance responsibility on structural stormwater BMPs that we do not own or operate. We plan to do this by drafting language that requires maintenance responsibility for structural stormwater BMPs to be tied to property records.

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### 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:

We will confer with the Public Works department of the Cleanwater County, which helps our township with any enforcement requirements, to provide a written procedure that will satisfy these requirements. We will initially meet with them within 3 months of the date of this application.

B. Describe your ERPs:

We do not currently have ERPs, see above implementation plan. See below for our current stage of draft:

#### Categories of Violations:

- Failure to apply for permit coverage
- Failure to prepare a Storm Water Pollution Prevention Plan (SWPPP)
- Inadequate SWPPP
- Failure to implement Best Management Practices (BMPs)
- Failure to maintain BMPs
- Failure to conduct or document inspections
- Non-stormwater discharge to the storm sewer system

#### Factors to Consider in the Selection of Enforcement Response:

- Whether there is an isolated or infrequent violation
- Frequent or repeat violations
- Other types of noncompliance involved
- Degree of impact to the environment

#### Enforcement Response:

- Notice of Violation (NOV) - A written document issued by Regulator (us) to a permittee or other regulatee informing them of the party's violation(s) of the applicable permit, statute or regulation
- Expedited Settlement Offer (ESO) - A consent agreement and final penalty order issued by us, in specified circumstances, where violations of the applicable permit, statute or regulation may be resolved quickly through an expedited process in which the violator:
  - § corrects identified deficiencies
  - § signs an agreement with us certifying that deficiencies have been corrected
  - § pays a penalty
- Administrative Order (AO) - A written document issued by us which contains findings of fact and which directs a permittee or other regulatee to achieve compliance with the applicable permit, statute or regulation
- Administrative Penalty Order (APO) - An order entered by us assessing penalties against a permittee or other regulatee for violating the applicable permit, statute or regulation

A Civil Action - A judicial action that typically seeks both penalties and injunctive relief for violating the applicable permit, statute or regulation

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

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

We work with the City of Cleanwater to make this system map and inventory. The City has a water resources specialist, who updates the map on-site using a handheld GPS unit. This allows us to have real-time updates to the stormsewer system map and inventory.

- 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:

IV.B. Our map currently displays pipes 24 inches or greater in diameter, with a large majority of 12 inch pipes added as well. Starting in March, we will continue working with the City of Cleanwater to map all pipeline locations that are 12 inches and greater in diameter. We will use a GPS to field mark all additional pipeline needed to be added, and then integrate them into the map.

- 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:

C.1. We have recently constructed four new ponds as part of a development in our Township. We are gathering the information of all of our ponds, including the new ones, and filling this into our inventory form to submit to the Commissioner.

- 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.

*\*A complete MS4 SWPPP Application for Reauthorization (SWPPP Document) will be placed on public notice for a period of 30 days to provide the public the opportunity to review the permittee's stormwater pollution prevention program document (SWPPP Document) and provide comment on the plan of the permittee to protect and improve water resources*

## 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**:

Our Township is primarily residential, and has a very limited business district. Therefore, our focus is on residential issues, though we do not have specific high-priority topics. We partner with Cleanwater River Watershed District to provide education to our residents. They provide us with brochures that we mail out to all households twice a year. These brochures remind homeowners of proper practices for such activities as raking grass clippings, cleaning up pet waste, and home car-washing. Cleanwater River Watershed District also has an annual water festival, where we are present to answer questions about how Township residents should deal with stormwater. The Township has a stormwater page on our website that we use to communicate stormwater-related messages.

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
Brochures	A new topic is circulated to an audience of 300 households in fall and spring each year.
Water Festival	Make face-to-face contact with at least 50 residents of the Township at this annual event in June. Provide all children with a take-away item.
Website	We measured 300 hits to our website last year.

BMP categories to be implemented	Measurable goals and timeframes
Citizen survey	Starting with the 2014 spring brochures, we will include a written survey in a random sample of mailings. The survey will gauge each selected household's practices related to the topic that will be featured in the following fall's brochure. They will receive a follow up the following spring. The same will happen with the fall for a different random sample, and this process will occur once in the permit term, so that we can determine whether our information affects household practices, and how we can improve our education information distribution.
Classroom presentations	Collaborate with Cleanwater City and Cleanwater River Watershed District to create 3 separate programs for each grade of 3-5 students at the local elementary school each year. These would include the basic concept of the water cycle and how individual actions can make a big difference in stormwater and water quality.
Storm drain stenciling	We hope to engage community groups in a storm drain stenciling effort to increase awareness that the drains are connected to our lakes and rivers. We want to stencil at least 100 drains in the next 3 years.
Social media	We currently have 30 followers on Twitter, and 100 likes on Facebook. We send a message or link to an interesting stormwater related article at least once a month. If any important events occur in our Township or nearby, we will send additional messages. Our goal is to add at least 15 followers on both media outlets every year.

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

Township Clerk

## 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 program as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

Every year, we present and hear comments on our Stormwater Pollution Prevention Program at a regular Township Board meeting. We usually do this at the October meeting. We put a notice in the local paper every week for a month before the meeting, and post a notice in the local library and town hall.

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	Have at least 20 attendees at yearly meeting.
Appropriate public notice	Make a weekly notice for one month in local paper. Post a paper notice in at least 2 places around town one month prior to meeting.
Availability of Stormwater Pollution Prevention Program Document	Provide a copy of Stormwater Pollution Prevention Program Document at the Town Hall and Library for viewing at any point in the year.
Water Festival	Booth at this yearly, June festival allows citizens to comment on our Stormwater Pollution Prevention Program verbally or through provided comment forms.

BMP categories to be implemented	Measurable goals and timeframes
Online Availability of Stormwater Pollution Prevention Program Document	Provide an electronic document of Stormwater Pollution Prevention Program document online, to allow anytime, easier access to these documents.
Establish a stormwater steering committee	Develop stormwater steering committee within 12 months of permit coverage extension. Committee is made up of representatives of various organizations: public, industrial, commercial and construction entities. Involving stakeholders early on in the program development will allow their voices to be heard prior to implementation.
Coordination meeting	The City will annually hold a coordination meeting involving co-permittees, regulatory agencies, and interested stakeholders to discuss progress of the storm water management program and the next year's activities.

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:

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

Education Coordinator

### 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:

We have an ordinance that prohibits illicit discharges and connections. Our partners from the Clearwater County Department of Public Works are trained to look for any signs of an illicit discharge while on the job. Our ERPs (attached) guide what actions we take after an illicit discharge has been identified. One of our Township board members trains along with County staff to identify illicit discharges. Clearwater River Watershed District has informational guides for fast food restaurants on how to handle grease and proper dumpster usage and maintenance.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

- 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
- 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
- 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
- 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
- Procedures for the timely response to known, suspected, and reported illicit discharges. ☒ Yes ☐ No
- Procedures for investigating, locating, and eliminating the source of illicit discharges. ☒ Yes ☐ No
- 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
- 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.d. We have an ordinance that prohibits illicit discharges and connections, but will be revising our program to include the identification of priority areas likely to have illicit discharges as outlined in the Permit (Part III.D.3.f.). We will be incorporating these prioritization efforts within 5 months after permit coverage is extended.

- 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 ordinance yearly to ensure that it continues to meet the needs of the Township and legal requirements.
Inspections	County employees are on the lookout for illicit discharges while they perform their normal duties, and inspections occur when we receive reports of an illicit discharge.
Training	County employees, and at least one Township Board member will participate in training for spotting and handling illicit discharges.
BMP categories to be implemented	Measurable goals and timeframes
Inspections	Monthly inspections of high-priority outfalls, and around high-risk establishments (fast food restaurants, dumpsters, car washes, mechanics, oil changes).
Storm Sewer Televising	On a yearly basis, hire a consultant to televise a section of our sewer system to find illicit connections to the system, as well as leaks and cracks that might exist. This will happen in late summer or early fall of each year.
Establish Illicit Discharge Reporting Hotline	Allow citizens to dial a number and leave a message 24/7 to report illicit discharges to the Township.

- 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. We are creating an Excel spreadsheet that will contain the date, time, and street address (or GPS coordinates if found by County staff at a location with no address) of any reported illicit connections or discharges. Each entry will have a description of the discharge, and if it is associated with a business. Next summer, we intend to have the funds for an intern to put this information into GIS so we can track illicit discharges and target our inspections more efficiently in the future.

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

Director of Public Works

*\*A complete MS4 SWPPP Application for Reauthorization (SWPPP Document) will be placed on public notice for a period of 30 days to provide the public the opportunity to review the permittee's stormwater pollution prevention program document (SWPPP Document) and provide comment on the plan of the permittee to protect and improve water resources*

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

- 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:

We have a permit application required for any construction site that disturbs 1 acre or more. We require 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. We partner with the Cleanwater Soil and Water Conservation District with a contract to perform our construction site ESC inspections. All site inspection checklists are scanned and retained electronically, and catalogued in a Microsoft Excel spreadsheet.

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

2.b. We will notify owners and operators proposing construction activity to apply for and obtain coverage for the MPCA general permit for construction activity. We will incorporate this effort into our program within two months after permit coverage is extended.

2.d.1) We plan to develop written procedures to explain our prioritization of inspections in the field. We will work with our City inspector to record current procedures. We plan to have these efforts developed with our Construction Site Stormwater Runoff Control program within two months after 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
Permit Application System	Process all applications within 30 days of receipt.
Inspections	Conduct inspections at 30% of permitted sites annually. Inspections occur every week during the growing season.
Education	Provide educational workshop on permit requirements for general contractors once a year. Collaborate with County and other LGUs.



BMP categories to be implemented	Measurable goals and timeframes
<a href="#">Permit Update</a>	Update our city permit and ordinance to meet MPCA General Permit to Discharge Stormwater Associated with Construction Activity.
<a href="#">Factsheet</a>	Develop factsheet to accompany permit application to assist contractors with understanding permit regulations.
<a href="#">Checklist for Site Plan Review</a>	Update procedures for site plan review on an annual basis and incorporate into the Checklist.
<a href="#">Prioritize Inspections</a>	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)

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

[Water Resource Technician](#)

#### 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:

[We have a post-construction stormwater management ordinance to encourage 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.d. We will develop procedures for documenting all legal mechanisms regarding long-term maintenance of structural stormwater BMPs implemented through our post-construction stormwater management regulatory mechanism. This effort will be completed within 5 months after 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
Inspections to verify proper maintenance of stormwater BMPs	Annual inspections of 20% of completed City-owned BMPs.
Encourage the use of structural and non-structural BMPs during review of new and redevelopment projects	Provide a factsheet to all permit applicants about stormwater BMPs used to capture pollutants prior to discharging to nearby waters.
Ordinance regulating new and redevelopment projects	After ordinance was in place for 3 years, began evaluating permits for how well they meet or exceed permit requirements; by 5 <sup>th</sup> year after ordinance was established, 95% of all building permits will include descriptions and plans regarding storm water control practices and site designs that comply with the criteria and guidance specified or referenced in the municipal code.
BMP categories to be implemented	Measurable goals and timeframes
Update ordinance to meet new permit requirements	Within 12 months of extension of permit coverage, revise ordinance to meet permit requirements.
Develop written procedures for site plan review	Within 12 months of extension of permit coverage, develop site plan review procedures that must be completed prior to the start of construction activity.
Document pertinent project information	Maintain all related documents pertaining to each new or redevelopment project in more user-friendly filing system for better records management. Implement within 6 months.
BMP Construction Guidance	Develop BMP Construction Guidance document for developers and contractors within 12 months of permit coverage extension.

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

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 of Cleanwater currently inspects its structural pollution control devices on an annual basis and inspects all of its outfalls, sediment basins and ponds each year. 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 once in the fall after leaf drop. Maintenance staff is trained semi-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:
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
Street Sweeping	Once a year after leaf drop
Inspect Maintenance Yard	Once a month and after all 1 inch or greater rain events
Internal training program	Semi-annual training where staff utilize training materials in their daily activities
New employee training	As part of training for new employees, both temporary and permanent, proper methods for handling and storing materials and for spotting and correcting potential problems are discussed. Employees must score 95% on a scenario-based quiz to complete training.
BMP categories to be implemented	Measurable goals and timeframes
Develop Spill Prevention & Control Plans for Municipal Facilities	Develop plans describing spill prevention and control procedures by the end of Year 1. Conduct annual spill prevention and response training sessions for all municipal employees. Distribute educational materials, e.g., posters and pamphlets, to each municipal facility by the end of Year 2.
Increase Inspection Frequency of Maintenance Yard	Once weekly and after all rain events utilizing a checklist for the inspection that documents findings and allows staff to compare to previous inspections.
Facility Inventory	Develop facility inventory in year 1 of City-owned properties and buildings including the compost site, HHW site and maintenance yard. Consider other city-owned facilities to inventory in year 2.
Pond Assessment Procedures & Schedule	In year 1, develop procedures for determining TSS and TP treatment effectiveness of city-owned ponds used for treatment of stormwater. Implement schedule in year 2 – 5.

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. We are currently examining methods for assessing ponds to determine TSS and TP effectiveness, as we mentioned in our BMP table. 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 year 2 – 5.

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

Street and Maintenance Supervisor

*\*A complete MS4 SWPPP Application for Reauthorization (SWPPP Document) will be placed on public notice for a period of 30 days to provide the public the opportunity to review the permittee's stormwater pollution prevention program document (SWPPP Document) and provide comment on the plan of the permittee to protect and improve water resources.*

## VI. Compliance Schedule for 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 (wq-strm4-49c) with the following naming convention: *MS4NameHere\_TMDL*. This form is found on the MPCA MS4 Program website: <http://www.pca.state.mn.us/ms4>.

*\*Additional guidance on completing the MS4 Permit TMDL Attachment Spreadsheet is provided on the MS4 Permit Program website as well.*

## 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 Program website: <http://www.pca.state.mn.us/ms4>.

## VIII. Add any additional comments to describe your program: