

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*.

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:

Direct link:

<http://eastgrandforks.us/documentcenter/view/2348>

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:

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:

Direct link:

<http://eastgrandforks.us/DocumentCenter/Home/View/28>

- 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:

- 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. BMP maintenance | <input checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input 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:

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: _____

- 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:

Direct link:

<http://eastgrandforks.us/DocumentCenter/Home/View/28>

- 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:

The City of East Grand Forks will update the existing ordinance within twelve months of the date permit coverage is extended.

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:
City will update ERP's with twelve months of the date permit coverage is extended.

B. Describe your ERPs:

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

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

Map is updated yearly, when projects are completed.

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

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

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

The City will update our storm sewer system maps indicating all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes, all outfalls will have a unique identification number assigned and all structural stormwater BMP's within 12 months of the date permit coverage is extended.

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:

City will provide pond inventory form.

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**:

Our education program consists of many activities as you will find described in the following list of established BMP's,

informational City Website, newspaper articles, public meetings and residential participation to name a few. We have very few illicit discharges reported. A high priority item for our City will be educating the public the best we can on what a illicit discharge is and request that they notify the City when they see one. We already have educational information available to residents, but we will try and expand on that information future.

Also in part IV letter E there was no box to type in, so the following is in response to that question: City will update storm system map within 12 months of the date permit coverage is extended.

- 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
<p>Distribute Educational Materials: The City will provide education that is targeted toward all employees and residents. This education will be specifically intended to provide all staff and residents with basic awareness of our City's SWPPP, as well as inform them of specific storm water related issues that are of high priority.</p>	<p>-We will continue to put out an informational newsletter to staff and residents. <i>Timeframe: annually</i></p> <p>-Continue posting storm water related educational material on our City Website. <i>Timeframe: ongoing/annually</i></p>
<p>Implement an Education Program: The City will prepare a presentation for the City Council and general public on a yearly basis to go over our SWPPP and other storm water related issues. The General Public will be sent a notice about the meeting in advance, which will also inform them on where they can find the education materials. The educational materials will always be available at City Hall and on the City website.</p>	<p>-Complete annual storm water presentation. Which will develop and maintain our City Council and the general public's awareness of our SWPPP. <i>Timeframe: annually</i></p>
<p>Education Program: Public Education and Outreach: Educate the public about storm water issues in the community and the impact that it has on water quality.</p>	<p>-Hold community cleanup days bi-annually; once in spring, and once in the fall. <i>Timeframe: twice per year</i></p> <p>-Track the number and location of illegal dumping incidents reported. <i>Timeframe: as needed</i></p> <p>-Publish storm water articles bi-annually. <i>Timeframe: twice per year</i></p> <p>-Continue updating material on City Webpage. <i>Timeframe: ongoing/annually</i></p>
<p>Education Program: Public Participation: Increase awareness by involving general public including City residents, homeowners, business owners, and school children in City Park Cleanup Event.</p>	<p>-Continue holding annual City Park Cleanup Day in the spring of each year. Track how many volunteers participate each year. <i>Timeframe: annually</i></p>
<p>Education Program: Illicit Discharge Detection and Elimination: Increase public awareness about what illicit discharge is. Teach the public the proper steps in stopping</p>	<p>-Publish a section on illicit discharge detection and elimination in our annual newsletter. <i>Timeframe: annually</i></p> <p>-Continue updating website posters and other that deal with illicit discharge.</p>

<p>someone who is discharging and whom they should contact. Educate the public about the benefits of eliminating illicit discharge on water quality and the community.</p>	<p><i>Timeframe: ongoing/annually</i></p> <p>-Continue to maintain information on reporting of a illicit discharge and keep our hotline posted on our City Web Page. <i>Timeframe: ongoing/annually</i></p>
<p>Education Program: Construction Site Run-off Control:</p> <p>Educate the general public with more emphasis being directed toward contractors, construction site operators, inspectors and enforcement personnel.</p>	<p>-Continue displaying our City Ordinance for Construction Site Run-off on our City Website. <i>Timeframe: ongoing/annually</i></p> <p>-Inform and educate inspectors on our SWPPP. <i>Timeframe: ongoing and as updated</i></p>
<p>Education Program: Post-Construction Storm Water Management in New Development and Redevelopment:</p>	<p>-The Building Official will prepare a newsletter to give to all contractors who are issued a building permit.</p>
<p>Education Program: Pollution Prevention/Good Housekeeping for Municipal Operations:</p> <p>Increase public awareness about good housekeeping practices for pollution prevention.</p>	<p>-Continue to talk about importance of good housekeeping in annually meeting. <i>Timeframe: annually</i></p> <p>-Publish a section on good housekeeping in our annual newsletter. <i>Timeframe: annually</i></p> <p>-Display informational material on website about importance of good housekeeping. <i>Timeframe: ongoing</i></p>
<p>BMP categories to be implemented</p>	<p>Measurable goals and timeframes</p>
<p>Coordination of Education Program:</p> <p>The City will develop an education program directed toward business activities with the potential to cause storm water pollution. Activities with known storm water pollution potential will be targeted. Literature specific to targeted activities will be developed along with a general version applicable to any commercial business whose premise is impacted by storm water.</p>	<p>-Educational Literature will be developed and sent out to target. <i>Timeframe: within 12 months, and thereafter will be ongoing/annually</i></p>
<p>Annual Public Meeting:</p> <p>The City of East Grand forks will hold an annual public meeting discussing the SWPPP. The General Public will be sent a notice about the meeting in advance, which will also inform them on where they can find the education materials. The meetings will be held in order to educate people about storm water and the long-term effects on the community. There will also be time to answer questions or concerns anyone might have. This meeting will be in conjunction with our City Council work session which is open to the general public.</p>	<p>-We will continue to have these meetings, covering new topics and keeping them informational year after year. The only difference is that we will combine this meeting with our annual storm water presentation. <i>Timeframe: within 12 months and thereafter annually</i></p>

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

East Grand Forks Public Works Director

B. MCM2: Public participation and involvement

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

The SWPPP is on the City website, and the City encourages input from the public.

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
<p>Comply with Public Notice requirements:</p> <p>The City will provide a notice for the annual storm water meeting or any subsequent meeting to discuss the provisions of the SWPPP, including effectiveness, implementation or amendments.</p>	<p>Complete public notice</p> <p><i>Timeframe: The first 30 day public notice will be for the annual public meeting presentation. If periodic meetings become necessary, additional 30 day public notices will be implemented.</i></p>
<p>Solicit Public Input and opinion on the Adequacy of the SWPPP:</p> <p>The City will use the education and outreach efforts outlined in our established BMP's for providing information to the general public about how the city manages storm water runoff. At the annual meeting, the City will provide a presentation on the purpose, goals, and requirements of the SWPPP to encourage input and comment on the SWPPP from the public. The City will also solicit public input and provide opportunity for comment on the SWPPP at any other subsequent public meetings.</p>	<p>-Increase citizen understanding of the impacts of storm water runoff, and increase participation and input on the SWPPP.</p> <p><i>Timeframe; annually</i></p> <p>Track the number of attendees at the annual public meeting on the SWPPP and the public input.</p> <p>-Timeframe: annually</p>
<p>Consider Public Input:</p> <p>The City of East Grand Forks will have an annual meeting discussing the SWPPP and informing the general public of what it is. The City will also take any public input and discuss it. The general public is also welcome to submit any written comments. Any input made will reviewed.</p>	<p>-Gather input, and answer questions from the Public pertaining to storm water. After meeting set goals for the next meeting and address major issues of concern.</p> <p><i>Timeframe: at least annually and as needed</i></p>
<p>BMP categories to be implemented</p>	<p>Measurable goals and timeframes</p>

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:

East Grand Forks Public Works Director

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 illicit discharge ordinance on file at City Hall, and is on our website as well. We talk about illicit discharge at our annual storm water meeting, we have informational materials on our website, and provide a hotline number citizens can call to report an illicit discharge.

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

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

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

The City of East Grand Forks will revise the existing illicit discharge ordinance and will continue to implement and enforce the ordinance to detect and eliminate illicit discharges. The revised ordinance will include the following:

- a. incorporation of illicit discharge detection into all inspection and maintenance activities under the Permit Part III.D.6.e and f. These inspections shall be conducted during dry-weather conditions.*
- b. detecting and tracking the source of illicit discharges using visual inspections, which may include camera's, collecting and analyzing water samples.*
- c. Training of all field staff, in accordance with the requirements of Part III.D.6.g(2), in illicit discharge recognition and reporting illicit discharges for further investigation.*
- d. identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land uses 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.*
- e. procedures for the timely response to known, suspected, and reported illicit discharges.*
- f. procedures for investigating, locating, and eliminating the source of illicit discharges.*
- g. procedures for responding to spills, including emergency response procedures to prevent spills from entering the City. 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 a leak as defined in Minn. Stat. 115.061.*
- h. when the source of the illicit discharge is found, the City will use the ERP's in Part III.B, to eliminate the illicit discharge and require any needed corrective actions.*

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
<p>Storm Sewer Map: The City of East Grand Forks Engineering Consultant has completed a storm sewer system map.</p>	<p>Map is complete and is updated annually.</p>
<p>Regulated Control Program The City of East Grand Forks has developed an ordinance which prohibits non-stormwater discharges.</p>	<p>The City will update ordinance as necessary.</p>
<p>Illicit Discharge Detection and Elimination Plan The City's plan consists of educating the public about illicit discharges and the effect on the community and a website has been created to report illicit discharges.</p>	<p>Educate the public as to what an illicit discharge is, and inform them on who to call if they witness one.</p>
<p>Public and Employee Illicit Discharge Information Program The City has started informing the staff and business owners about illegal discharges.</p>	<p>Educate businesses on identification and reporting of illicit discharges.</p>
<p>Identification of Non-Stormwater Discharges and Flows The City has started the process of identifying the non-stormwater discharges and flows, such as water line flushing and lawn watering, which are significant contributors of pollutants to our MS4.</p>	<p>Goal: to identify any non-stormwater discharges that maybe of concern. Ongoing.</p>
BMP categories to be implemented	Measurable goals and timeframes
<p>Storm Sewer Map: The City of East Grand Forks Engineering Consultant has completed a storm sewer system map.</p>	<p>Map is complete and is updated annually. However we do not have flow direction on our maps. <i>Timeframe: Updated annually, and map will be updated with flow directions within 12 months of the date permit coverage is extended.</i></p>
<p>Regulated Control Program The City of East Grand Forks has developed an ordinance which prohibits non-stormwater discharges.</p>	<p>The ordinance will be updated within the 12 months of the date permit coverage is extended.</p>
<p>Illicit Discharge Detection and Elimination Plan The City's plan consists of educating the public about illicit discharges and the effect on the community and a website has been created to report illicit discharges.</p>	<p>The City will revise their current ordinance to include:</p> <ul style="list-style-type: none"> a. illicit discharge detection into all inspections and maintenance. b. detecting and tracking the source of all illicit discharges. c. training of all staff in illicit discharge recognition. d. identify all areas of priority likely to have illicit discharges. e. procedure for timely responses to illicit discharges. f. procedures for investigating and eliminating all illicit discharges. g. procedure for responding to spills. h. the City will use ERP's when the source of an illicit discharge is found. <p>Timeframe: The City will update the ordinance within the 12 months of the date permit coverage is extended.</p>
<p>Public and Employee Illicit Discharge Information Program The City has started informing the staff and business</p>	<p>The City will gather additional feedback from the staff and business owners about illicit discharges. Timeline: The City will implement the program within the 12</p>

owners about illegal discharges.	months of the date permit coverage is extended.
Identification of Non-Stormwater Discharges and Flows	Investigate and evaluate potential for non-stormwater discharges to be significant contributors of pollutants. Conduct investigation and evaluation of non-stormwater discharges and flows.
The City has started the process of identifying the non-stormwater discharges and flows.	Timeline: The identification of non-stormwater discharges and flows will be within 12 months of the date permit coverage is extended.

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:

City will implement record keeping within 12 months of 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:

Public Works Director

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 of East Grand Forks has established an ordinance to control construction site waste that may impact storm water runoff. The objective of the ordinance is to:

- a. promote, preserve, and enhance the natural resources.*
- b. protect and promote the health, safety, and welfare of the people.*
- c. protect the City's natural resources.*
- d. regulate land disturbing, or other activities that may adverse and potentially irreversible impact on water quality.*
- e. minimize conflicts and encourage compatibility land disturbing and development.*
- f. require detailed review standards.*
- g. provide for adequate construction site storm water runoff control and appropriate storm water runoff design as necessary to protect public and private property.*

The ordinance also includes the SWPPP application, review and permit requirements and enforcement.

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 construction activity? Yes No
 - 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.

The City will modify their current ordinance to include the following:

- a. *written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the City.*
- b. *a checklist or other written means to document construction site inspections when determining compliance.*
- c. *the program will include construction site inspection checklists or other written materials to document site inspections.*

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
<p>Ordinance or other Regulatory Mechanism</p> <p>The City will expand the existing construction site ordinances to meet the minimum requirements set forth by MPCA.</p>	<p>Goal: The City will continue to update the ordinance.</p> <p>Timeline: enforced <i>within 12 months of the date permit coverage is extended.</i></p>
<p>Construction Site Implementation of Erosion and Sediment Control BMP's</p> <p>The City will evaluate the existing procedures and documentation for construction site erosion and sediment control. Changes will be made to meet the mandatory provisions written in the construction site storm water runoff ordinance.</p>	<p>Goal: complete plan review process and documentation procedures.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Waste Controls for Construction Site Operators</p> <p>The City will develop and begin implementation of a program to control construction site waste that may impact storm water runoff. This program shall address construction site entrances, vehicle maintenance, concrete truck cleanout, and equipment washing areas.</p>	<p>Goal: The frequency of inspection and maintenance activities and whether or not the construction vehicles are regularly inspected.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Procedure for Site Plan Review</p> <p>The City will include in its pre-construction activities program, requirements for the review or regulated construction site plans submitted by the contractor for the implementation of sedimentation and erosion controls before ground is broken.</p>	<p>Goal: the number of site plan reviewers and inspectors trained and the number of noncompliant permits reported.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Establishment of Procedures for the Receipt and Consideration of Reports of Stormwater Noncompliance</p> <p>The City will develop and implement a program that deals with the proper actions that should be taken with parties that do not comply with the SWPPP. Any reports received about parties in noncompliance will be handled immediately by the proper authority and proper action will be taken.</p>	<p>Goal: The amount of reports of noncompliance received and the amount of penalties given out.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Establishment of Procedures for Site Inspection and Enforcement</p> <p>The City will specify the procedures for construction site best management practice(BMP) inspections and the enforcement of installed erosion and sedimentation control measures. This program will also address contractor and inspector training.</p>	<p>Goal: offer training programs to contractors and inspectors and what type of enforcement action is required.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>

BMP categories to be implemented

Measurable goals and timeframes

<p>Ordinance or other Regulatory Mechanism</p> <p>The City will expand the existing construction site ordinances to meet the minimum requirements set forth by MPCA.</p>	<p>Goal: The City will continue to update the ordinance.</p> <p>Timeline: enforced <i>within 12 months of the date permit coverage is extended.</i></p>
<p>Construction Site Implementation of Erosion and Sediment Control BMP's</p> <p>The City will evaluate the existing procedures and documentation for construction site erosion and sediment control. Changes will be made to meet the mandatory provisions written in the construction site storm water runoff ordinance.</p>	<p>Goal: complete plan review process and documentation procedures.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Waste Controls for Construction Site Operators</p> <p>The City will develop and begin implementation of a program to control construction site waste that may impact storm water runoff. This program shall address construction site entrances, vehicle maintenance, concrete truck cleanout, and equipment washing areas.</p>	<p>Goal: The frequency of inspection and maintenance activities and whether or not the construction vehicles are regularly inspected.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Procedure for Site Plan Review</p> <p>The City will include in its pre-construction activities program, requirements for the review or regulated construction site plans submitted by the contractor for the implementation of sedimentation and erosion controls before ground is broken.</p>	<p>Goal: the number of site plan reviewers and inspectors trained and the number of noncompliant permits reported.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Establishment of Procedures for the Receipt and Consideration of Reports of Stormwater Noncompliance</p> <p>The City will develop and implement a program that deals with the proper actions that should be taken with parties that do not comply with the SWPPP. Any reports received about parties in noncompliance will be handled immediately by the proper authority and proper action will be taken.</p>	<p>Goal: The amount of reports of noncompliance received and the amount of penalties given out.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>
<p>Establishment of Procedures for Site Inspection and Enforcement</p> <p>The City will specify the procedures for construction site best management practice(BMP) inspections and the enforcement of installed erosion and sedimentation control measures. This program will also address contractor and inspector training.</p>	<p>Goal: offer training programs to contractors and inspectors and what type of enforcement action is required.</p> <p>Timeline: to be within the 12 months of the date of permit coverage is extended.</p>

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

Public Works Director

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 developed procedures for developments and redevelopments with the City Consulting Engineer. This plan identifies the procedures necessary for the post construction stormwater management as it pertains to construction activities as designed by the City consultant.

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 Yes No

compliance?

- 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.

City will update post construction storm water management plan within 12 months of 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
<p>Development and Implementation of Structural and/or Non-Structural BMP's</p> <p>The City will develop procedures and practices for a development and redevelopment plan review program by the engineering consultant</p>	<p><i>Goal: develop plan review process.</i></p> <p><i>Timeline: to be within the 12 months of the date of permit coverage is extended.</i></p>
<p>Regulatory Mechanism to Address Post Construction Runoff from New Development and Redevelopment</p> <p>The City will review existing stormwater ordinance and make changes necessary as per the Phase II general permit.</p>	<p>Goal: complete ordinance review and draft revisions</p> <p>Timeline: to be within the 12 months of the permit coverage is extended.</p>
<p>Long-term Operation and Maintenance of BMP's</p> <p>The City will develop a maintenance plan for any publicly owned or privately owned stormwater BMP located throughout the MS4.</p>	<p>Goal: yearly inspections and maintenance.</p> <p>Timeline: to be within the 12 months of the permit coverage is extended.</p>

BMP categories to be implemented	Measurable goals and timeframes
<p>Development and Implementation of Structural and/or Non-Structural BMP's</p> <p>The City will develop procedures and practices for a development and redevelopment plan review program by the engineering consultant</p>	<p><i>Goal: develop plan review process.</i></p> <p><i>Timeline: to be within the 12 months of the date of permit coverage is extended.</i></p>
<p>Regulatory Mechanism to Address Post Construction Runoff from New Development and Redevelopment</p> <p>The City will review existing stormwater ordinance and make changes necessary as per the Phase II general permit.</p>	<p>Goal: complete ordinance review and draft revisions</p> <p>Timeline: to be within the 12 months of the permit coverage is extended.</p>
<p>Long-term Operation and Maintenance of BMP's</p> <p>The City will develop a maintenance plan for any publicly owned stormwater BMP located throughout the MS4.</p>	<p>Goal: yearly inspections and maintenance.</p> <p>Timeline: to be within the 12 months of the permit coverage is extended.</p>

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

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:

City has street sweeping policy. City will inspect all outfalls and ponds rotating basis, inspedct all expected stockpiles,. City also has follow up inspections.

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:

City will establish facilities inventory within 12 months of the date premit coverage is extended.

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

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

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

Established BMP categories	Measurable goals and timeframes
<p>Street Sweeping The City has developed a street sweeping program for all city streets and parking lots. The City sweeps these impervious surfaces at least once a year.</p>	<p>Goal: Continue implementing our street sweeping program to mitigate storm water pollution. Ongoing.</p>
<p>Annual Inspection of all Structural Pollution Control Devices The City conducts annual inspections on all ponds and outlet structures.</p>	<p>Goal: Inspect and maintain all structural pollution control devices. Ongoing annually.</p>
<p>Record reporting and Retention of all Inspections and responses to the Inspections The City has the USARMY CORPS inspect all outfalls on an annually basis.</p>	<p>Goal: Inspect all outfalls and associated structures, and retain records for review. Ongoing annually.</p>
<p>Evaluation of Inspection Frequency The City evaluates annually inspection reports on all stormwater outfalls and control structures.</p>	<p>Goal: Evaluate the status of our outfalls and associated control structures. Ongoing annually.</p>

BMP categories to be implemented	Measurable goals and timeframes
<p>Municipal operations and Maintenance Program The City will have a Municipal Operations and Maintenance program. The program will include general operations and maintenance procedures of the</p>	<p>Goal: track the number of discharged pollutants and read and review the reports from the inspectors. Timeline: to be within the 12 months of the permit coverage is</p>

storm sewer system such that discharged pollutants are minimized.	extended.
Annual Inspection of all Structural Pollution Control Devices The City will develop a program that deals with annual inspection and cleaning of detention ponds and outlet structures. The program will consist of starting a five year cycle to inspect and clean all of the catch basins in the storm sewer system.	Goal: inspect, maintain and report control devices Timeline: to be within the 12 months of the permit coverage is extended.
Inspection of a Minimum of 20 percent of the ms4 Outfalls, Sediment Basins and Ponds Each Year on A rotating basis The City will have a program in place to inspect a minimum of 20% of the MS4 outfalls, sediment basins and ponds each year on a rotating basis. The City will maintain or replace the required components of the storm sewer system.	Goal: details of the inspection reports and identify the structures to be replaced or maintained. Timeline: to be within the 12 months of the permit coverage is extended.
Quarterly Inspection of all Exposed Stockpile, Storage and Material Handling Areas The City will develop a program that will quarterly inspect all exposed stockpile, storage and material handling areas.	Goal: inspect all stockpiles, storage and material handling areas and develop inspection form. Timeline: The City is still developing the inspection form.
Inspection Follow-up Including the Determination of Whether Repair, Replacement or Maintenance Measures are Necessary and the Implementation of the Corrective Measures The City will develop a program that will deal with inspection follow-up.	Goal: provide written reports identifying the problem and the correct follow-up procedure. Timeline: The City is still developing this program.
Record reporting and Retention of all Inspections and responses to the Inspections The City will develop a program that will record reporting and retention of all inspections and responses to inspections.	Goal: 100% of all inspections to be on file Timeline: to be within the 12 months of the permit coverage is extended.
Evaluation of Inspection Frequency The City will have in place a program that will make yearly evaluations and reports put together identifying if all inspections have been completed and if all required maintenance and or repair work items have been completed.	Goal: provide a written report on an annual basis Timeline: to be within the 12 months of the permit coverage is extended.

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:

The City will develop procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all City owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit(Part III.D.6.d) and these will be established within 12 months of 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 Works Director

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
- If **no**, continue to section VII.
 - 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
- If **no**, this section requires no further information.
 - 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