



MS4 SWPPP Application for Reauthorization

Municipal Separate Storm Sewer Systems (MS4s) Stormwater Pollution Prevention Program (SWPPP)

Doc Type: Permit Application

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

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

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

General Contact Information (*Required fields)

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

*MS4 permittee name: City of Worthington *County: Nobles
(city, county, municipality, government agency or other entity)

*Mailing address: P.O. Box 279

*City: Worthington *State: MN *Zip code: 56187

*Phone (including area code): 507-372-8640 *E-mail: d.haffield@ci.worthington.mn.us

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

*Last name: Haffield *First name: Dwayne
(department head, MS4 coordinator, consultant, etc.)

*Title: City Engineer

*Mailing address: P.O. Box 279

*City: Worthington *State: MN *Zip code: 56187

*Phone (including area code): 507-372-8640 *E-mail: d.haffield@ci.worthington.mn.us

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

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

Title:

Mailing address:

City: State: Zip code:

Phone (including area code): E-mail:

Verification

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

Certification (All fields are required)

- Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

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

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

Name: Dwayne Haffield
(This document has been electronically signed)

Title: City Engineer Date (mm/dd/yyyy): 12/05/2013 (Rev: 1/3/2014)

Mailing address: P.O. Box 279

City: Worthington State: MN Zip code: 56187

Phone (including area code): 507-372-8640 E-mail: d.haffield@ci.worthington.mn.us

Note: The application will not be processed without certification.

Stormwater Pollution Prevention Program Document

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

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

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

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:

(D)(2) of City Ordinance 1000 codified as Chapter 54 (D)(2):

Waste controls and illicit discharge.

(2) Illicit discharges and connections.

(a) No person shall cause any illicit discharge to enter the municipal storm water system unless such discharge:

1. Consists of non-storm water that is authorized by an NPDES point source permit obtained from the MPCA; or

2. Is associated with fire fighting activities.

(b) No person shall use any illicit connection to intentionally convey non-storm water to the city storm water system.

Direct link:

<http://www.ci.worthington.mn.us/sites/default/files/docs-forms/stormwater-ordinance.pdf>

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:

Evaluate the existing ordinance and revise as needed to address deficiencies within 12 months of permit coverage being extended. Provisions of the ordinance to be evaluated include those pertaining to adequate authority to access properties for regulation of illicit discharges and to exempt non-stormwater discharges.

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:

(D) (3) of City Ordinance 1000 codified as part of Chapter 54(D)(3):

Good Housekeeping Provisions - Any owner or occupant of property within the City shall comply with the following good housekeeping requirements:

a. No person shall leave, deposit, discharge, dump, or otherwise expose any chemical or septic waste in an area where discharge to streets or storm drain system may occur. This section shall apply to both actual and potential discharges.

b. Storage of Materials, Machinery, and Equipment

i. Objects, such as motor vehicle parts, containing grease, oil or other hazardous substances, and unsealed receptacles containing hazardous materials, shall not be stored in areas susceptible to runoff or discharge to a storm water system.

ii. Any machinery or equipment that is to be repaired or maintained in areas susceptible to runoff shall be placed in a confined area to contain or collect leaks, spills, or discharges without discharge to the storm water system.

c. Removal of Debris and Residue. Fuel and chemical residue or other types of potentially harmful material, such as animal waste, garbage or batteries, which is located in an area susceptible to runoff, shall be removed as soon as possible and disposed of properly. Household hazardous waste shall not be placed in a trash container.

(E) of City Ordinance 1000 codified as Chapter 54 (E):

Erosion and Sediment Control

1. Erosion and sediment controls, both temporary and permanent, on all sites other than Small Sites shall, at a minimum, meet the requirements and provisions defined in the NPDES Storm Water Permit for Construction Activities. No Land Disturbing Activity on any site other than a Small Site shall be conducted prior to obtaining coverage under the NPDES General Storm Water Permit for Construction Activities or a NPDES Storm Water Permit for Construction Activities specific to the project has been issued.

2. Erosion control on Small Sites shall, at a minimum, meet the requirements of the rules of the Watershed District. No Land Disturbing Activity on a Small Site shall be conducted before a Watershed District permit has been applied for.

Direct link:

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg*.

B. 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):

- | | |
|--|--|
| <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: _____ | |

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:

(E) through (K) of City Ordinance 1000 codified as Chapter 54 (E) through (K):

(E) Erosion and Sediment Control

1. Erosion and sediment controls, both temporary and permanent, on all sites other than Small Sites shall, at a minimum, meet the requirements and provisions defined in the NPDES Storm Water Permit for Construction Activities. No Land Disturbing Activity on any site other than a Small Site shall be conducted prior to obtaining coverage under the NPDES General Storm Water Permit for Construction Activities or a NPDES Storm Water Permit for Construction Activities specific to the project has been issued.

2. Erosion control on Small Sites shall, at a minimum, meet the requirements of the rules of the Watershed District. No Land Disturbing Activity on a Small Site shall be conducted before a Watershed District permit has been applied for.

(F) Storm water controls. All storm water must be discharged in a manner that does not cause nuisance conditions, erosion in receiving channels or on downslope properties, or inundation in wetlands causing an adverse impact to the wetlands.

(G) Maintenance of privately-owned storm water management systems. All storm water management systems that are owned by an entity other than the city and discharge within the city must be designed to minimize the need of maintenance, to provide easy vehicle and personnel access for maintenance purposes and be structurally sound. It shall be the responsibility of the owner to obtain any necessary easements or other property interests to allow access to the storm water management facilities for inspection and maintenance purposes. All such systems must have an operation and maintenance plan that ensures continued effective removal of the pollutants carried in storm water runoff. All such systems shall be operated and maintained in accordance with the plan.

(H) Plan review.

(1) Prior to conducting any land disturbing activity on a small site, the owner of the site, or a

representative of the owner, shall submit a Small Site Erosion Control Plan to the city and a copy of the application for a Watershed District permit. The plan shall include all requirements of the rules of the Watershed District.

(2) Prior to conducting any land disturbing activity on any site other than a small site, the owner of the site, or a representative of the owner, shall submit a Storm Water Pollution Prevention Plan to the city and the application for a NPDES Storm Water Permit for Construction Activities. The plan shall include all requirements of the NPDES Storm Water Permit for Construction Activities.

(3) The SWPPP or Small Site Erosion Control Plan and applicable permit application for any land disturbing activity that requires a building permit or other development permit shall be submitted with the application for such a permit. The permit application shall be considered incomplete until a complete SWPPP or Small Site Erosion Control Plan is submitted.

(4) Each SWPPP shall be reviewed by the City Engineer. Any SWPPP found to not substantially meet all requirements of the NPDES Storm Water Permit for Construction Activities may be returned to the owner or owner representative for correction. A corrected SWPPP shall be submitted to the city within five working days. Any Small Site Erosion Control Plan may be reviewed by the City Engineer. The Watershed District may be notified of any Small Site Erosion Control Plan that is found to not meet the requirements of the rules of the Watershed District.

(5) Modifications to a SWPPP or Small Site Erosion Control Plan shall be submitted to the city for review.

(I) Inspections. Inspections as defined in this provision do not fulfill the inspections and maintenance requirements as defined in the NPDES Permit for Construction Activities.

(1) The city may conduct inspections of any site on which a land disturbing activity is occurring on a regular basis to monitor erosion and sediment control practices. In all cases the inspectors will attempt to work with the owner or owner's representative to maintain proper erosion and sediment control at all sites. In cases where cooperation is withheld, construction stop-work orders may be issued by the city until erosion and sediment control measures meet the requirements of this section.

(2) The city may conduct inspections of all privately-owned storm water management systems at any reasonable time.

(3) An owner shall promptly allow the city and its authorized representatives, upon presentation of credentials to:

(a) Enter upon a site for the purpose of obtaining information, examination of records, conducting investigations, inspections or surveys;

(b) Bring such equipment upon the permitted site as is necessary to conduct such inspections, surveys and investigations;

(c) Examine and copy any books, papers, records, or memoranda pertaining to activities or records required to be kept under the terms and conditions of a NPDES Storm Water Permit for Construction Activities;

(d) Inspect the storm water pollution control measures; and/or

(e) Sample and monitor any items or activities pertaining to storm water pollution control measures.

(4) Any temporary or permanent obstruction to the safe and easy access of such an inspection shall be promptly removed upon the inspector's request. The cost of providing such access shall be born by the owner.

(J) Enforcement.

(1) Actions to ensure compliance until final stabilization has been achieved. The city may take the following action in the event of a failure by owner or owner representative to meet the terms of this section:

(a) The City Engineer may issue a written stop-work order upon his or her determination that construction, excavation or any other activity regulated by this section is taking place in violation of a NPDES Storm Water Permit for Construction Activities, a Watershed District permit, or this section. The stop-work order shall detail the violations, the remedies necessary to correct the violations, and the time frame allowed in which the property owner is to correct the violations. The order shall also indicate that the property owner has ten business days from the receipt of the stop-work order to appeal the order to the City Council. Upon receipt of a stop-work order, the person conducting the construction, excavation or other activity regulated by this section shall immediately cease the activity until authorization for such activity is granted by the City Engineer.

(b) Revoke any land use and building permits issued to the owner of the site, its contractor, or its representative.

(c) Conduct or hire a contractor to conduct remedial or corrective action on the development site or adjacent site affected by a failure in any erosion or sediment control measure.

1. The owner shall be personally liable for the cost to the city associated with correcting the failure or mitigating damage from the failure. As soon as the work has been completed and the cost determined, the

City Clerk or other official shall prepare a bill for the cost and mail it to the owner. Thereupon the amount shall be immediately due and payable at the office of the City Clerk. If payment is not made within 30 days, payment may be made from any of the owner's financial securities.

2. The Clerk shall, on or before September 1 next following completion of remedial or corrective action, list the total unpaid charges along with all other such charges as well as other charges for current services to be assessed under M.S. § 429.101 against each separate lot or parcel to which the charges are attributable. The Council may then spread the charges against such property under that statute and other pertinent statutes for certification to the County Auditor and collection along with current taxes the following year or in annual installments, not exceeding ten, as Council may determine in each case.

(d) Bring other actions against the owner or owner representative to recover costs of remediation or meeting the terms of this section, which are not covered by financial securities.

(2) Actions to ensure maintenance and repair of a privately-owned storm water management system. The city can take the following action in the event of a failure by owner or owner representative to meet the terms of this section:

(a) Conduct or hire a contractor to conduct maintenance and repair of a privately-owned storm water management system.

1. The owner shall be personally liable for the cost to the city associated with maintaining or repairing a privately-owned storm water management systems. As soon as the work has been completed and the cost determined, the City Clerk or other official shall prepare a bill for the cost and mail it to the owner. Thereupon the amount shall be immediately due and payable at the office of the City Clerk. If payment is not made within 30 days, payment may be made from any of the owner's financial securities.

2. The Clerk shall, on or before September 1 next following completion of maintenance or repair, list the total unpaid charges along with all other such charges as well as other charges for current services to be assessed under M.S. § 429.101 against each separate lot or parcel to which the charges are attributable. The Council may then spread the charges against such property under that statute and other pertinent statutes for certification to the County Auditor and collection along with current taxes the following year or in annual installments, not exceeding ten, as Council may determine in each case.

(b) Bring actions against the owner to require maintenance and repair of any privately-owned storm water management system.

(K) Response time and notification.

(1) For all land disturbing activities until final stabilization has been achieved.

(a) The schedule for inspection, maintenance, and repair of all erosion and sediment control measures shall be conducted as required in the NPDES Storm Water Permit for Construction Activities and Watershed District rules.

(b) If erosion breaches the perimeter of the site, the owner or owner representative shall immediately develop a cleanup and restoration plan, obtain the right-of-entry from the adjoining property owner, and implement the cleanup and restoration plan within 48 hours of obtaining the adjoining property owner's permission. In no case, unless written approval is received from the city, may more than seven calendar days go by without corrective action being taken. When restoration to wetlands and other resources are required, the applicant shall work with the appropriate agency to ensure that the work is done properly.

(c) If eroded soils (including tracked soils from construction activities) enter or appear likely to enter streets, wetlands, or other water bodies, cleanup and repair shall be immediate. The owner or owner representative shall provide all traffic control and flagging required to protect the traveling public during the cleanup operations.

(d) Should the owner or owner representative fail to respond to the failure of a sediment or erosion control measure as required herein, the city may initiate actions to conduct remedial and corrective actions required. Any notification required will be to the owner or owner representative. Except during an emergency action, 48 hours after notification by the city or 72 hours after the failure of erosion control measures, whichever is less, the city at its discretion, may begin corrective work. Such notification should be in writing, but if it is verbal, a written notification should follow as quickly as practical. If after making a good faith effort to notify the owner or owner representative, the city has been unable to establish contact, the city may proceed with remedial and corrective work.

(2) Maintenance and repair of a privately-owned storm water management systems.

(a) The inspection, maintenance, and repair of all privately-owned storm water management systems shall be conducted as required in the NPDES Storm Water Permit for Construction Activities.

(b) Should the owner fail to maintain and repair a privately-owned storm water management system as required herein, the city may initiate actions to conduct required maintenance and repairs. Any required notification shall be by certified mail to the owner. The city, at its discretion, may begin maintenance or repairs at any time following the expiration of the following time periods allowed for the owner to complete all required maintenance or repairs:

1. Within 365 calendar days of the owner's receipt of a notification to remove accumulated sediment from a retention basin;
2. Within 60 calendar days of the owner's receipt of a notification to perform any repair or maintenance, other than removal of accumulated sediment from a retention basin, needed to remedy a condition that is not resulting in erosion or a visible release of sediment. Such notification shall be mailed on or before October 1 of each year; and/or
3. Within 14 calendar days of the owner's receipt of a notification to perform any repair or maintenance needed to remedy a condition that is resulting in erosion or a visible release of sediment.

(3) *Emergency action.* Notwithstanding any other provisions of the section, the city may enter property to repair, alter, or remove any erosion or sediment control measure or storm water management system as needed abate, remedy, or correct a condition that presents or may present an imminent or substantial danger to the health or welfare of persons downstream, or substantial danger to the environment. During such a condition the city may take immediate action, and then notify the owner or owner representative as soon as possible.

Direct link:

<http://www.ci.worthington.mn.us/sites/default/files/docs-forms/stormwater-ordinance.pdf>

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:

Modify existing ordinance to include requirements for post construction storm water management on redevelopment projects within 12 months of the date permit coverage is extended. Evaluate existing ordinance in regard to its authority to ensure maintenance of privately owned BMPs and modify ordinance as needed within 12 months of the date permit coverage is extended. Evaluate need/desirability of allowing offsite mitigation and modify existing ordinance to authorize offsite mitigation within parameters established in MS4 permit. Evaluation of allowing offsite mitigation may continue past 12 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:
Develop ERP's within 12 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:
Base Storm water mapping in CAD with updates at least annually to reflect improvements and modifications and errors or omissions discovered. GIS overlay of outfalls, MS4 and Private BMPS, NPDES permitted sites and major watersheds maintained as needed. All on NAD_1983_HARN_Adj_MN_Nobles_Feet
- B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:
1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. Yes No
 2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. Yes No
 3. Structural stormwater BMPs that are part of the permittee's small MS4. Yes No
 4. All receiving waters. Yes No

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

- C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:
1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. Yes No
 2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. Yes No
- D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.
1. A unique identification (ID) number assigned by the permittee. Yes No
 2. A geographic coordinate. Yes No
 3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. Yes No

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

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

- E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA Yes No on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4> , according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*.

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

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

A. MCM1: Public education and outreach

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

The City's current education program consists of providing three flyers annually with utility billings and installing "do not dump" markers at catch basin inlets. Recent flyers have included one on illicit discharges. Markers are intended to educate the public that disposal into the storm sewer is not allowed. Educational information is also maintained on City's stormwater web site (www.ci.worthington.mn.us/stormwater).

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
Provide flyers on storm water pollution prevention with utility bills	Three annually
Install "do not dump" markers at catch basins	Install at suitable locations on the public collection system readily accessible by the public
BMP categories to be implemented	Measurable goals and timeframes
Provide flyers on storm water pollution prevention with utility bills	Three annually with not less than 1 per six addressing illicit discharges
Install "do not dump" markers at catch basins	Maintain existing markers by installing up to 100 per year

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

City Engineer

B. MCM2: Public participation and involvement

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

Conduct an annual public meeting at a regularly scheduled Council meeting reviewing the current SWPPP and prior year accomplishments

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

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

Established BMP categories	Measurable goals and timeframes
<i>Conduct an annual public meeting allowing for comments</i>	Annually
BMP categories to be implemented	Measurable goals and timeframes
<i>Conduct an annual public meeting allowing for comments</i>	Annually
Evaluate replacing annual meeting with opportunity to comment on SWPPP by means of internet	If implemented it would be a continuous presentation of SWPPP and opportunity to comment. Document comments received.

- 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:

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

City Engineer to conduct meeting. City Clerk to provide meeting minutes.

C. MCM 3: Illicit discharge detection and elimination

- 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:

Maintenance operators review for evidence of illicit discharges during outfall, BMP and system inspections and maintenance. Evidence of any reoccurring illicit discharge or connection of an illicit source is referred to the City Engineer for evaluation and direction as to the need for additional investigation. Illicit discharges in progress are able to be reported to Public Safety for enforcement of City Code.

- 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

- 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:

Develop response procedures and prioritize areas for increased inspections for illicit discharges within 12 months of the permit coverage being extended. Implement training of field staff within 12 months of the date permit coverage is extended.

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

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

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

Established BMP categories	Measurable goals and timeframes
Ordinance	Review ordinance at least annually to ensure it is effective. Revise as needed.
Inspection	<i>Maintenance personnel look for evidence of illicit discharges while conducting collection system inspections and maintenance. Indications of an illicit discharge will be noted in inspection reports and followed up with additional investigations as needed to determine and eliminate source.</i>
Call Number Available for Reporting Discharge	Police dispatch is continuously available to receive reports of an illicit discharge. The dispatch phone number is provided in educational material as the number to report an illicit discharge. Patrol is notified to investigate for a discharge in progress. Calls are logged and forwarded for further investigation as may be needed.

BMP categories to be implemented	Measurable goals and timeframes
Inspections	<i>Appropriate maintenance personnel will participate in training in identifying and processing illicit discharges.</i>
Inspections	Outfalls from high priority areas will be identified and inspected at least annually.

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:

Develop written inspection and response procedures within 12 months of the permit coverage being extended

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

MCM:

City Engineer

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, the permittee shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

The City has adopted an ordinance that requires compliance with the state wide NPDES storm water permit for construction. This ordinance prohibits the issuance of a development permit until an acceptable SWPPP (or Erosion Control Plan for small sites) has been submitted to City and coverage under the state wide permit (or Watershed Permit for small sites) is applied for. Periodic inspections of construction sites are conducted.

- 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.

Develop additional written inspection and enforcement procedures in cooperation with Okabena-Ocheda Watershed District within 12 months of the permit coverage being 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
Ordinance	Review ordinance at least annually to ensure it is effective. Revise as necessary.
Inspections	Active sites are inspected periodically during the construction season. Sites with repetitive defects are typically inspected more frequently than well maintained sites.
Plan Review	SWPPPs for all sites disturbing more than 1 acre are reviewed for compliance with NPDES permit requirements. MPCA SWPPP checklist typically used as guideline.

BMP categories to be implemented	Measurable goals and timeframes
Inspections	Develop written procedures for inspections and review annually for adequacy.
Inspections	Inspect each site disturbing more than 1 acre at least once per year.
Plan Review	Utilize MPCA checklist for SWPPP if updated for new permit requirements if made available or develop revised check list. Use for each SWPPP review.

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

City Engineer

E. MCM 5: Post-construction stormwater management

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

The City has adopted a storm water ordinance which includes provisions requiring storm water management systems be operated and maintained in accordance with an operation and maintenance plan that ensures continued effective removal of the pollutants carried in storm water runoff .

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.

Develop written procedures for documentation of post-construction storm water management within 12 months of the permit coverage being 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
Ordinance	Review ordinance at least annually to ensure it is effective. Revise as needed.

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

Implement use of site plan review checklist	Implement use of checklist for site plan review to be completed prior to the start of construction activity within 12 months of extension of permit coverage.
Implement use of documentation checklist	Implement use of checklist of required post construction storm water management documentation within 12 months of extension of permit coverage.

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:

Streets are swept at least twice annually, once following snow melt and once as late in the fall as practical. BMPs, excluding ponds, are inspected annually. 20% of all outfalls and ponds are inspected annually. Inspection records are maintained. Storage and handling sites are reviewed frequently with limited documentation. The City's storm water ordinance adopts the construction permit standards that includes provisions for protection of drinking water sources. Maintenance operators are informally instructed on pollution prevention practices.

2. Do you have a facilities inventory as outlined in the Permit (Part III.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:
- An inventory will be developed within 12 months of the permit coverage being extended.*

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

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

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

Established BMP categories	Measurable goals and timeframes
Street Sweeping	Twice Annually
BMP Inspections	Once Annually
Outfall and Pond Inspections	At least 20% inspected Annually

BMP categories to be implemented	Measurable goals and timeframes
Outfall and Pond Inspections	All inspected within each permit cycle
Facilities Inventory	Develop inventory of all City facilities that contribute pollutants to storm water discharges in year one. Review the inventory annually and revise as needed.
Implement inspections of City Facilities	Implement quarterly inspections of stockpiles, and materials storage and handling areas following development of Facilities Inventory

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:

Documentation requirements will be expanded to meet the requirements for all inspections within 12 months of the permit coverage being extended.

Documentated training will be implemented within 12 months of the permit coverage being extended.

Methods to evaluate the effectiveness of TSS and TP removal in City owned ponds will be established within 12 months of the date permit coverage is extended. A schedule for evaluating ponds will be developed in years 2 through 5 of the permit.

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

City Engineer for Item 5.

Director of Public Works for all other items.

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

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? Yes No
1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the TMDL/WLA Compliance Schedule Excel spreadsheet (**Attachment 1**) with the following naming convention: *MS4NameHere_TMDL*. Attachment 1 is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

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

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

1. If **no**, this section requires no further information.
2. If **yes**, the activity of chemically treating stormwater to remove phosphorus occurs within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems supplement (**Attachment 2**) to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

Attachment 2 is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program