

MS4 SWPPP Application for Reauthorization

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

Doc Type: Permit Application

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

Submittal: This *MS4* SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at <u>ms4permitprogram.pca@state.mn.us</u> 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 <u>claudia.hochstein@state.mn.us</u>, Dan Miller at 651-757-2246 or <u>daniel.miller@state.mn.us</u>, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

| MS4 Owner (with own | ership or operational responsibi | lity, or | control of t | the MS4) |
|----------------------------|--|----------|----------------|---|
| *MS4 permittee name: | City of Moorhead | | | *County: Clay |
| | (city, county, municipality, government | t agency | or other entit | ty) |
| *Mailing address: P.O. | Box 779 | | | |
| *City: Moorhead | * | State: | MN | *Zip code: _56561 |
| *Phone (including area cod | e): 218-299-5386 | | *E-mail: | bob.zimmerman@ci.moorhead.mn.us |
| MS4 General contact | (with Stormwater Pollution Prev | vention | Program [| [SWPPP] implementation responsibility) |
| *Last name: Zimmerma | an | | *First | name: Robert |
| (departmer | nt head, MS4 coordinator, consultant, e | tc.) | | |
| *Title: City Engineer | | | | |
| *Mailing address: P.O. | Box 779 | | | |
| *City: Moorhead | | *State: | MN | *Zip code: <u>56561</u> |
| *Phone (including area cod | e): 218-299-5386 | | *E-mail: | bob.zimmerman@ci.moorhead.mn.us |
| Preparer information | (complete if SWPPP application | n is pre | pared by a | a party other than MS4 General contact) |
| Last name: Crabtree I | | • | | name: Andrea |
| | nt head, MS4 coordinator, consultant, et | tc.) | | |
| Title: Utilities Engineer | - | | | |
| Mailing address: P.O. | Box 779 | | | |
| City: Moorhead | | State: | MN | Zip code: <u>56561</u> |
| Phone (including area code |):218-299-5386 | | E-mail: | andrea.crabtree@ci.moorhead.mn.us |
| | | | | |
| 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.). Xes
- 2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. 🛛 Yes

Certification (All fields are required)

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

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

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

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

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

| Name: | Robert Zimmerman | | | | | |
|---------|---------------------------|---|-----------|-----------------|-------------|-----------|
| | (This document has been | electronically signed) | | | | |
| Title: | City Engineer | | Dat | e (mm/dd/yyyy): | 12/2/2013 | |
| Mailing | address: P.O. Box 77 | 9 | | | | |
| City: | Moorhead | | State: MN | | Zip code: | 56561 |
| Phone | (including area code): 21 | 8-299-5386 | E-mail: | bob.zimmermar | n@ci.moorhe | ead.mn.us |
| | (| Note: The applic processed witho | | | | |

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 |
|---|--|
| Clay County; | |
| The City of Moorhead has a memorandum of understanding with Clay County that the City will provide MS4 responsibility within City limits. | MCM 1, 2, 3, 4, 5 & 6 |

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.)? Xes \Box 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:

- Title 3 Public Health and Sanitation
- Chapter 8 Stormwater Management

3-8A-1: PURPOSE (C)

3-8A-2: DEFINITIONS - PROHIBITED DISCHARGE: (A-E) & STORMWATER

- 3-8A-3: SCOPE PROHIBITED DISCHARGE: (A)
- 3-8A-4: MANAGEMENT OF SITE VEGETATION: (A & C)
- 3-8E-1: STORMWATER VIOLATIONS AND REPORTING: (A.3 & B)

3-8F-1: ENFORCEMENT, PENALTY AND NONCOMPLIANCE FEES

3-8G-4: ESTABLISHMENT OF STORMWATER UTILITY FUND: (A)

3-8G-5: PURPOSE OF THE FUND: (E & F)

9-2-5: PLUMBING FACILITIES AND FIXTURE REQUIREMENTS (G)

- 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:

Within 12 months of permit coverage extension amend the stormwater ordinance to include;

- A definition of "nonstormwater"
- · Criteria for authority to access facilities for illicit discharge inspection

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? Xes C No
 - 1. If yes:
 - a. Check which type of regulatory mechanism(s) your organization has (check all that apply):
 - ☑ Ordinance
 □ Contrace
 □ Policy/Standards
 □ Permits
 □ Rules
 □ Other, explain:

Contract language

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:

Title 3 - Public Health and Sanitation

Chapter 8 - Stormwater Management

3-8A-2: DEFINITIONS: BEST MANAGEMENT PRACTICES (BMP), BUFFER, CONTROL MEASURES, EROSION, EROSION AND SEDIMENT CONTROL PLAN, EROSION CONTROL, EXPOSED SOIL AREAS, FINAL STABILIZATION, LAND DISTURBING ACTIVITY, MANAGEMENT PRACTICE, PROHIBITED DISCHARGE, SEDIMENT, SEDIMENT CONTROL, STABILIZED, STORMWATER MANAGEMENT, STORMWATER POLLUTION PREVENTION PLAN (SWPPP), AND TEMPORARY PROTECTION

3-8A-3: SCOPE: (B.4, C & D)

3-8C-2: STORMWATER MANUAL

3-8C-4: STORMWATER MANAGEMENT CRITERIA FOR PERMANENT FACILITIES: (A & D)

3-8D-1: PERMITS REQUIRED: (D.5)

3-8D-2: CONSTRUCTION PLANS AND SPECIFICATIONS: (B)

3-8D-3: CONSTRUCTION ACTIVITIES: (A-F)

3-8E-1: STORMWATER VIOLATIONS AND REPORTING: (A.5)

8-1-8: CONTRACTORS' OPERATIONS: (A-G)

Direct link:

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:

Within 12 months of permit coverage extension amend the current stormwater ordinance to be at least as strigent as the MPCA Construction Stormwater Permit.

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

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

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

C.8: Within 12 months of permit coverage extension amend the stormwater ordinance to include criteria for the use of temporary sediment basins within 1 mile of an impaired water and greater than 1 mile from an impaired water.

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:

Title 3 - Public Health and Sanitation

Chapter 8 - Stormwater Management

3-8C-5: OPERATION, MAINTENANCE AND INSPECTION

3-8C-7: PLAN APPLICABILITY

Direct link:

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg.*

- B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):
 - 1. Site plan review: Requirements that owners and/or operators of construction activity submit Site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity.

| 2. | co pra for | mbin actice estry | ions for post construction stormwater management: Requires the use of any ation of BMPs, with highest preference given to Green Infrastructure techniques and es (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban <i>r</i> , green roofs, etc.), necessary to meet the following conditions on the site of a ction activity to the Maximum Extent Practicable (MEP): | | |
|----|------------------|-------------------------|--|-------|-------|
| | a. | | r new development projects – no net increase from pre-project conditions (on an annual erage basis) of: | 🗌 Yes | 🖾 No |
| | | 1) 2) 3) | Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)). Stormwater discharges of Total Suspended Solids (TSS). Stormwater discharges of Total Phosphorus (TP). | | |
| | b. | | r redevelopment projects – a net reduction from pre-project conditions (on an annual erage basis) of: | 🗌 Yes | 🖾 No |
| | | 1) 2) 3) | Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)). Stormwater discharges of TSS. Stormwater discharges of TP. | | |
| 3. | St | orm | vater management limitations and exceptions: | | |
| | a. | Lim | itations | | |
| | | 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 backage. | | |
| | | | 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 acil infiltration rates are more than 8.2 inches per hour. | | |
| | | • | 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 NO |
| 4. | stor acti | rmwa vity a | on provisions: The permittee's regulatory mechanism(s) shall ensure that any ter discharges of TSS and/or TP not addressed on the site of the original construction are addressed through mitigation and, at a minimum, shall ensure the following ments are met: | | |
| | a. | Miti | gation 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) 4) | Locations in the next adjacent DNR catchment area up-stream | | |
| | h | 4) Miti | Locations anywhere within the permittee's jurisdiction. gation projects must involve the creation of new structural stormwater BMPs or the | | |
| | b. | retro | of existing structural stormwater BMPs, or the use of a properly designed regional ctural stormwater BMP. | Yes | 🛛 No |
| | c. | | tine maintenance of structural stormwater BMPs already required by this permit cannot 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 No |
| 5. | med and BMI con only that | ng-term maintenance of structural stormwater BMPs: The permittee's regulatory chanism(s) shall provide for the establishment of legal mechanisms between the permittee owners or operators responsible for the long-term maintenance of structural stormwater Ps not owned or operated by the permittee, that have been implemented to meet the ditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This v includes structural stormwater BMPs constructed after the effective date of this permit and are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. | | |
| | 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 | ☐ Yes | 🛛 No |

Permit (Part III.D.5.a(2)) continue to be met. If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

B.2.a: Within 12 months of permit coverage extension amend the current stormwater ordinance for new development to meet the MPCA permit requirements to the maximum extent practicable. A technical analysis of local soil and groundwater conditions will be completed to evaluate feasibility and guide subsequent ordinance language.

B.2.b: Within 12 months of permit coverage extension amend the current stormwater ordinance for redevelopment to meet the MPCA permit requirements to the maximum extent practicable. A technical analysis of local soil and groundwater conditions will be completed to evaluate feasibility and guide subsequent ordinance language.

B.3.a.1 & 2:Within 12 months of permit coverage extension amend the current stormwater ordinance prohibiting and restricting infiltration practices as outlined in the MPCA Permit.

B.3.a.3: Within 12 months of permit coverage extension amend the current stormwater ordinance to include the exceptions for linear projects as outlined in the MPCA Permit.

B.4.a-f: Within 12 months of permit coverage extension amend the current stormwater ordinance to include mitigation provisions in the MPCA permit where mitigation is required or appropriate.

B.5.c: Withing 12 months of permit coverage extension amend the current stormwater ordinance to include conditions to protect/preserve structural BMPs and site features that are implemented to comply with the MPCA Permit.

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

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)?

🛛 Yes 🗌 No

- 1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
- 2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:
- B. Describe your ERPs:

The City of Moorhead currently has four (4) Enforcement Response Procedure (ERP) plans in place that cover:

- Stormwater Pollution Prevention Plans
- Illicit Discharge and Detection
- Construction Site Inspection
- Post Construction

Enforcement response within the plans consists of various types of actions:

• Notice of Violation – A written notice issued by the City of Moorhead to the party violating the City's ordinance, permit or standards.

• Administrative or Criminal Penalty – A written document that is issued by the City of Moorhead to the party that has not corrected a previous NOV for violating the City's ordinance, permit or standards.

• Stop work order – A written document to suspend work until the site is brought into compliance.

• Revoke City GEC Stormwater Permit – A written notice revoking the stormwater management plan or stormwater permit until the site is brought into compliance. Permits for other construction sites will not be issued until the site in violation is brought into compliance.

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

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

The storm sewer system is managed with GIS. The GIS system is routinely updated based on data from inspections and as-built plans for new construction and reconstruction projects.

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 |
|----|---|-------|------|
| | Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. | 🛛 Yes | 🗌 No |

🗌 No

⊠ Yes □ No

⊠ Yes □ No ⊠ Yes □ No

| 3 | Structural stormwater BMPs that are part of the permittee's small MS4. | 🛛 Yes |
|----|--|-------|
| J. | O(d) | |

4. All receiving waters.

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.ab.), including: |

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

- 2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed 🛛 Yes 🗌 No conveyances.
- 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.
 - 2. A geographic coordinate.
 - 3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional X Yes No judgment.

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

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

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: <u>http://www.pca.state.mn.us/ms4</u>, 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 of Moorhead has established an educational program that focuses on information relevant to citizens, business owners, contractors and City staff. The City uses our stormwater website, newsletters, brochures and a local non-profit group named River Keepers.

• The website contains brochures to educate the public and buiness owners on best management practices to prevent illicit discharges to the storm sewer system. Every brochure has the 24-hour stormwater hotline to report an illicit discharge.

• At least once per year a stormwater related article is published in the Insights and Communicator newsletters. The Insights is distributed to the public and the Communicator is distributed to City staff.

• River Keepers hosts educational events such as the water festival, storm drain marking program, S.S. Ruby boat tours and other stormwater related workshops.

• High-priority topics have included pet waste, lawn care, and general stormwater issues.

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.

| At least one article per year in the Insights and Communicator newsletters. Number of newsletters distributed. Update the website as needed with educational material. Number of hits to the stormwater webpage each year. Presentations are given when requested, number of participants attending and topic of presentation. Information is on the City website and distributed in educational materials. Track the number of calls and e-mails to the community hotline and e-mail address. Educate City staff on illicit discharges. Annual stormwater article published in the employee newsletter. Number of |
|--|
| Number of hits to the stormwater webpage each year. Presentations are given when requested, number of participant attending and topic of presentation. Information is on the City website and distributed in educationa materials. Track the number of calls and e-mails to the community hotline and e-mail address. Educate City staff on illicit discharges. Annual stormwater article published in the employee newsletter. Number of |
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| materials. Track the number of calls and e-mails to the community hotline and e-mail address.Educate City staff on illicit discharges. Annual stormwater article published in the employee newsletter. Number of |
| article published in the employee newsletter. Number of |
| newsletters distributed. |
| Educate citizens about the Clay County Household Hazardous Waste Program with information on the website, newsletter article and brochures. The amount of hazardous waste collected in Clay County each year. |
| Educate business owners with target mailings and newsletter article. Number of newsletters and brochures distributed. |
| Educate contractors on the erosion/sediment control standards for residential construction, commercial construction and utility construction. Track presentations and correspondence. |
| Train park, building and fleet maintenance staff. Number of employees trained annually. |
| River Keepers is a local non-profit group that conducts the annual Red River Water Festival for area students. City staff |
| - |

| | gives an educational presentation, does hands on activity with the students and distributes educational material. Number of students in attendance. |
|----------------------------------|--|
| Storm Drain Marking Program | The City provides River Keepers with supplies and a storm sewer map for the storm drain marking program. City staff promotes the program through the website and brochures. The number of storm drains marked is reported each year. |
| S.S. Ruby tours | Educational tours are given about history, geography, wildlife and stormwater. Number of passengers are reported to the City each year. |
| BMP categories to be implemented | Measurable goals and timeframes |
| | Place seasonally appropriate educational brochures at City Hall. Track the number of brochures printed. |
| | Website, number of hits to the stormwater webpage. |
| | Target mailings in response to complaints or identified issues. The number and name of brochures mailed. High priority stormwater related issues for residential areas include pet waste, lawn care, and car washing. |
| Brochures/Fact Sheets | Target mailings, number and name of brochure/fact sheet mailed. High priority stormwater related issues for commercial properties include, trash, illicit discharge, fats oil and grease. |
| Community educational events | River Keepers will host at least 2 educational events related to water conservation, pollution prevention and sustainable river use. River Keepers will annually report on two events each calendar year. Number of participants at the event, date of the event, and copies of educational materials distributed. |
| Program Evaluation | Evaluate the education program yearly. Is the material effective and appropriate for our target audience? Document citizen feedback related to the SWPPP. |

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

Utilities Engineer - Stormwater

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

The City of Moorhead holds a combined public hearing and annual report meeting at a City council meeting typically in May or June of each year. Staff presents the previous year activities to the City Council. A notice is published in the local newspaper 30 days and 15 days in advance of the meeting. At the meeting the City affords an opportunity for interested citizens to be heard with respect to the SWPPP. Written comments on the SWPPP may also be submitted in advance of the public meeting.

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 |
|---|--|
| Public Notice | Notice for the public hearing and annual meeting is given in the local newspaper 30 days and 15 days in advance of the annual meeting. |
| Annual Meeting | At the meeting, the City will afford and opportunity for interested citizens to be heard with respect to the Stormwater Pollution Prevention Program (SWPPP), written comments may also be submitted in advance of the meeting. A record of comment from |
| www.pca.state.mn.us • 651-296-6300 • 800-657-38 | • TTY 651-282-5332 or 800-657-3864 • Available in alternative formats |
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| | the meeting regarding the SWPPP will be kept on file. |
|--|--|
| Public Input | Number of phone calls and e-mails to the community hotline and e-mail address to report illicit discharges, comment on the SWPPP, report construction site violations, and voice any other stormwater related questions or concerns. |
| Website – Stormwater Pollution Prevention Program (SWPPP) | The SWPPP is made available on the City's website to allow access to the document for public review and comment. A copy of the document is also available upon request to citizen's that do not have internet access. |
| Storm Drain Marking | Number of storm drains marked with "No Dumping Drains to River" decals. Number of volunteers participating in the program. City staff provides River Keepers with supplies for the storm drain marking program, GIS map of the storm sewer system, and promotes the program through our website and brochures. |
| BMP categories to be implemented | Measurable goals and timeframes |
| Community educational events | River Keepers will host at least 2 educational events related to water conservation, pollution prevention and sustainable river use. River Keepers will annually report on two events each calendar year. Number of participants at the event, date of the event, and copies of educational materials distributed. |
| Annual Meeting | The annual summary report of the previous year's SWPPP activities is made available through the City Council agenda on the City's website. |

3. Do you have a process for receiving and documenting citizen input? Xes INo

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:

Utilities Engineer - Stormwater

C. MCM 3: Illicit discharge detection and elimination

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

The City of Moorhead has a stormwater ordinance that prohibits illicit discharges and connections. Our Emergency Reponse Procedures (ERPs) guide actions taken after an illicit discharge has been reported. A 24-hour hotline and e-mail address have been established to report illicit discharges to City staff.

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.ef.)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 |
| a atata | mp. up | altornativ | o formata |

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- 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).

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

C.2.c - Within 12 months of permit coverage extension an electronic form of educational training materials will be sent to all City staff once per year to help field staff identify illict discharges. The educational material will also include who they should report a possible illicit discharge to for further investigation.

C.2.d - Within 12 months of permit coverage extension an evaluation of land use will be conducted. The evaluation will include areas with large quantities of materials stored that could result in an illicit discharge to the storm sewer system. Areas that are identified from the land use evaluation shall have additional illicit discharge inspections because of the higher likelihood of an illicit discharge to occur.

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 |
|---|--|
| GIS storm sewer map | A storm sewer map has been completed in ArcGIS format. The City will update the map as needed. |
| Ordinance | Annually review the stormwater ordinance and identify changes for future revisions. |
| | To detect and eliminate illicit discharges and connections. Enforcement Response Procedures (ERPs) were created as a guide when investigating a report of an illicit discharge. |
| | City employees, business owners, and the public are informed about illicit discharges through newsletter articles, brochures and fact sheets. |
| | The City has a 24-hour hotline to report and illicit discharge to the storm sewer system (218.299.5386). |
| | Televise at least 2,000 feet of storm sewer is annually to inspect for illicit discharges or connections. |
| Illicit Discharge | The City promotes the use of the Clay County Hazardous Waste Facility on our website, newsletters and brochures. The amount of hazardous waste collected in Clay County each year. |
| | Number of brochures or educational materials distributed to the public that contain the 24-hour hotline and e-mail address to report an illicit discharge. |
| Illicit Discharge Detection hotline or e-mail | Track the number of calls and e-mails reporting an illicit discharge. |
| | Inspect 20% of outfalls each year for illicit discharges or more often areas that have received a report of an illicit discharge. |
| Inspections | Televise at least 2000 linear feet each year of the storm sewer system to inspection for illicit discharges. |
| BMP categories to be implemented | Measurable goals and timeframes |
| GIS storm sewer map | Pipes that are 12 inches in diameter or greater must be shown on the map. All known pipes of all sizes are currently mapped in our GIS system. The storm sewer system will be updated as needed, but at least annually. |

| Training | Send out training material to City staff via e-mail once per year on illicit discharges to help field staff identify what is an illicit discharge. Number of employees receiving training material on illicit discharge each year. |
|-------------------------------|---|
| Illicit discharge inspections | Quarterly inspections during dry weather to high risk inspections areas that were identified as part of the land use evaluation process. |

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:

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

Utilities Engineer - Stormwater

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:

In 2005 the City of Moorhead expanded its stormwater ordinance to meet the MPCA General Stormwater Permit for Construction Activity requirements. Procedures and documents were put in place for site plan review, site inspection 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? | ∐ 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 <i>Discharge Stormwater Associated with Construction Activity No. MN R100001</i> ? | No 🗌 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? | □ 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? | 🗌 No |
| | Does your program identify a frequency at which you will conduct construction site inspections? | 🗌 No |
| | 3) Does your program identify the names of individual(s) or position titles of those responsible for Xes conducting construction site inspections? | 🗌 No |
| | 4) Does your program include a checklist or other written means to document construction site Xes inspections when determining compliance? | 🗌 No |
| e. | Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? | 🗌 No |
| f. | Does your program document stormwater-related comments and/or supporting information used to Ves determine project approval or denial? | 🗌 No |
| g. | Does your program retain construction site inspection checklists or other written materials used to document site inspections? | 🗌 No |
| If vo | you answered no to any of the above permit requirements, describe the tasks and corresponding schedules that | t will be |

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.

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 | In 2005 the City expanded its existing stormwater ordinance to include requirements to meet the MPCA General Stormwater permit for Construction Activity. |
| Permits, Construction Standards, and Inspection Procedures | The City receives applications and issues stormwater permits. The City has developed construction standards, and standard operating procedures (SOPs) for site inspections. Materials are reviewed annually and updated as needed. |
| | Waste control for construction site operators are incorporated into the Stormwater Pollution Control Plan for City let projects. Number of SWPPP's which include waste control. |
| Waste Control | Residential, commercial and utility construction project standards with waste control guidelines are on the website. Review standards and update as needed. |
| Site Plan Review | A checklist was developed for the review of construction site temporary erosion and sediment control plans and specifications. Plans are received by Building Codes staff and a notice is sent to Engineering staff for review. During the review process staff determines how much land is disturbed, if an MPCA construction permit is needed and if the project meets the MPCA construction permit requirements. |
| Construction Standards | Sediment control BMPs are outlined in the Erosion and Sediment control standards on our website for residential, commercial and utility construction. Review standards and update as needed. |
| Site Inspection and Enforcement | Standard Operating Procedures (SOP) were created for construction site inspections. Report the number of site inspections and the number of violations each year. |
| BMP categories to be implemented | Measurable goals and timeframes |
| | Within 12 months of the permit coverage extension staff will upload the site plan review checklist to stormwater webpage for easy access for contractors, consultants and developers. |
| Site Plan Review Checklist | Annually review site plan review checklist and update as needed. |
| Ordinance | Review and update the ordinance as needed to meet the MPCA General Stormwater Permit for Construction Activity requirements. Review ordinance once per permit term and update as needed. |
| Construction Standards | Within 6 months after permit coverage is extended update residential, commercial and utility Erosion/Sediment control standards to meet the requirements of the MPCA Construction Permit. |

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

Utilities Engineer - Stormwater

E. MCM 5: Post-construction stormwater management

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

The City has a stormwater ordinance for new development and redevelopment projects. Site plan reviews are conducted to ensure proper site design. The City inspects and maintains installed stormwater BMPs located throughout Moorhead. Preventative and corrective maintenance is performed on City owned stormwater BMPs.

- 2. Have you established written procedures for site plan reviews that you will conduct prior to the start of 🛛 🖾 Yes 🗌 No construction activity?
- 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?
- All supporting documentation associated with mitigation projects that you authorize?
- c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))?
- 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?

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

E.3.a-d Within 12 months of permit coverage extension amend the current stormwater ordinance to meet the permit requirements for post-construction stormwater management and develop standard operating procedures for E.3.a-d.

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* (<u>http://www.epa.gov/npdes/pubs/measurablegoals.pdf</u>)</u>. **If you have more than five categories**, hit the tab key after the last line to generate a new row.

| Established BMP categories | Measurable goals and timeframes |
|--|--|
| Inspections of installed stormwater BMPs for Post- construction | Annually inspection 20% of city-owned BMPs. |
| Site Plan review for new development and redevelopment | Number of site plan reviews performed annually. Number of City let projects. Number of new structural or non-structural stormwater treatment BMPs created. Compile data for annual report. |
| Ordinance | Stormwater ordinance was expanded to include requirements for new development and redevelopment based on the previous MPCA permit requirements. The ordinance requirements are implemented through the site plan review process. Compile a list of changes for future ordinance and update as needed. |
| Long-term Maintenance | Inspect and maintain installed City owned stormwater BMPs. |
| BMP categories to be implemented | Measurable goals and timeframes |
| Develop written standard operating procedures for site plan review | Within 3 months of permit coverage extension an SOP for site plan review must be developed to include post-construction maintenance. Updated as needed. |
| Update ordinance to meet new MPCA permit requirements | Revise existing stormwater ordinance within 12 months of permit coverage to meet MPCA permit requirements. Compile a list of changes for future ordinances and update as needed. |
| Document pertinent project information | Maintain all related documents pertaining to each new or redevelopment project in a more user-friendly filing system for better records management. Implement within 6 months. |

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

Utilities Engineer - Stormwater

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

🗌 Yes 🛛 No

| 🗌 Yes | 🛛 No |
|-------|------|
| 🗌 Yes | 🛛 No |
| Yes | 🛛 No |

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

The City of Moorhead currently inspects catch basins, storm sewer pipe, stormwater ponds, outfalls and exposed stockpiles per established schedule. Mechanical street sweepers are used to remove sediment and debris from all City streets. Street sweeping typically begins in early spring and finishes in late fall.

The Parks Department, fleet maintenance and building maintenance staff are trained on such topics as;

- Good Housekeeping and Spill Prevention
- Vehicle and Equipment Washing
- Vehicle and Equipment Maintenance
- Street Maintenance
- Outdoor Storage of Materials and Wastes
- Landscaping and Lawn Care
- 2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)?

🛛 Yes 🗌 No

- 3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:
- 4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

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

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

| Established BMP categories | Measurable goals and timeframes |
|---|---|
| Street Sweeping | Track the start date and end date that the sweepers are removing debris from the streets. Report the quantity of debris removed each year. |
| Catch basin cleaning and inspections | Number of catch basins cleaned and inspected each year. |
| Inspections – Stormwater Ponds and Outfalls | Inspect 20% of ponds and outfalls each year. |
| Storm sewer televising | Televise at least 2,000 feet of storm sewer annually. |
| Inspections – Exposed stockpiles | Inspect stockpiles annually |
| Employee Training | Annual newsletter article. Train park, fleet maintenance and building maintenance staff. |
| Emergency spill response plan | Emergency spill response plans for the Joint Public Works, Public Works, Transfer Station, Wastewater Treatment Facility and field equipment will be reviewed annually and updated as needed by the appropriate staff. |
| BMP categories to be implemented | Measurable goals and timeframes |
| Employee Training | Distribute training materials annually through e-mail to all City staff. Number of City staff that receives training material. |
| Update Facility Inventory | Update existing public owned facility inventory as needed. |
| Inspections - Exposed stockpiles | Increase stockpile inspection to a quarterly event instead of an annual event. |
| Pond Assessment Procedures & Schedule | Develop procedures and a schedule for determining TSS and TP treatment effectiveness of all city-owned ponds used for the treatment of stormwater within 12 months after the extension of permit coverage. |

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)?

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 | 🗌 Yes | 🛛 No |
|----|--|-------|------|
| | vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? | | |

| 2) | Source water protection areas for surface intakes identified in the source water | 🛛 Yes | 🗌 No |
|----|--|-------|------|
| | assessments conducted by or for the Minnesota Department of Health under the federal | | |
| | Safe Drinking Water Act, U.S.C. §§ 300j – 13? | | |

| 6. | Have you developed procedures and a schedule for the purpose of determining the TSS and | 🗌 Yes | 🛛 No |
|----|---|-------|------|
| | 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.)? | | |

| 7. | Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)- | 🗌 Yes | 🛛 No |
|----|---|-------|------|
| | (3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material | | |
| | handling areas? | | |

8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:

| а. | 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 |
| Do you keep documentation of inspections, maintenance, and training as required by the Permit | | 🛛 Yes 🗌 No |

9. Do you keep documentation of inspections, maintenance, and training as required by the Permit Yes No (Part III.D.6.h.(1)-(5))?

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

F.6 Develop procedures and a schedule for determining TSS and TP treatment effectiveness of all City owned stormwater ponds that are used to collect and treat stormwater runoff.

F.7 The City of Moorhead will increase the exposed stockpile inspections from annually to quarterly per year.

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

Utilities Engineer - Stormwater

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?
 - 1. If **no**, continue to section VII.
 - 2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

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

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 I Yes No are regulated by this Permit (Part III.F.)?

- 1. If **no**, this section requires no further information.
- 2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

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

VIII. Add any Additional Comments to Describe Your Program