



Minnesota Pollution Control Agency

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

MS4 SWPPP Application for Reauthorization

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

Doc Type: Permit Application

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

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

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

General Contact Information (*Required fields)

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

*MS4 permittee name: St. Cloud, City *County: Stearns, Benton, Sherburne
(city, county, municipality, government agency or other entity)
*Mailing address: 400 Second Street South
*City: St. Cloud *State: MN *Zip code: 56301
*Phone (including area code): (320) 255-7225 *E-mail: info@ci.stcloud.mn.us

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

*Last name: Czech *First name: Noah
(department head, MS4 coordinator, consultant, etc.)
*Title: Stormwater Compliance Specialist
*Mailing address: 525 60th Street South
*City: St. Cloud *State: MN *Zip code: 56301
*Phone (including area code): (320) 255-7226 *E-mail: noah.czech@ci.stcloud.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

- I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). Yes
- 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: Patrick Shea
(This document has been electronically signed)

Title: Public Services Director Date (mm/dd/yyyy): 12/15/13

Mailing address: 400 Second Street South

City: St. Cloud State: MN Zip code: 56301

Phone (including area code): (320) 255-7225 E-mail: patrick.shea@ci.stcloud.mn.us

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
Central Minnesota Water Education Alliance (CMWEA) The partnership is to help meet education requirements (see below description)	MCM 1

- 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*.

Central Minnesota Water Education Alliance (CMWEA) is a coalition of central Minnesota MS4's and other organizations that provide educational outreach to promote water quality stewardship. The mission of CMWEA is to develop and implement educational programs that encourage individuals in Central Minnesota to protect water resources by increasing their knowledge and making simple behavior changes. By working in concert, the members of CMWEA are able to provide a consistent water quality education message.

MS4 permitted CMWEA members include the Cities of St. Cloud, Sartell, Sauk Rapids, Waite Park, St. Joseph; Stearns County; St. Joseph Township, Le Sauk Township; St. Cloud State University; and MNDOT. Other members include the Cities of Cold Spring, Melrose, Rockville, Paynesville and Richmond; Stearns County Soil and Water Conservation District; Sauk River Watershed District; and the Sauk River Chain of Lakes Association.

CMWEA members are required to sign a membership agreement which includes membership dues and a member participation requirement. Both are used to ensure maximum benefit to each member and the public. CMWEA is dedicated to assisting members to meet education requirements through a variety of tools and resources. Members have access to all of CMWEA's past and current education material to use beyond CMWEA's programs and to specifically target additional local education needs. CMWEA members annually evaluate the education program to ensure the needs of each member are met and to meet associated permit requirements. www.mnwaterconnection.com

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:

Ordinance Sections 365:00, 365:10, 365:30 and 365:50

Direct link:

<http://www.ci.stcloud.mn.us/DocumentCenter/Home/View/374>

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming

convention: MS4NameHere_IDDEreg.

2. If no:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Construction site stormwater runoff control

A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? Yes No

1. If yes:

a. Check which type of regulatory mechanism(s) your organization has (check all that apply):

- Ordinance Contract language
- Policy/Standards Permits
- Rules
- Other, explain: _____

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Ordinance Sections 365:00, 365:10, 365:40 and 365:50

Direct link:

<http://www.ci.stcloud.mn.us/DocumentCenter/Home/View/374>

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

B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? Yes No

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

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

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

- 1. Best Management Practices (BMPs) to minimize erosion. 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:

The erosion and sediment control section of the ordinance will be updated to include language related to C.3., C.4., and C.6. pertaining to sites the City regulates that are more stringent than the MPCA's general permit to Discharge Stormwater Associated with Construction Activity. This will be completed within 12 months of the date permit coverage is extended.

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:

Land Development Code: Article 19.12

Direct link:

<http://www.ci.stcloud.mn.us/DocumentCenter/View/4084>

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 Yes No

impacts to groundwater, when the infiltration device will be constructed in areas:

- a) With predominately Hydrologic Soil Group D (clay) soils.
- b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
- c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
- d) Where soil infiltration rates are more than 8.3 inches per hour.

- 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. Yes No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

- a. Mitigation project areas are selected in the following order of preference: Yes No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up stream
 - 4) Locations anywhere within the permittee's jurisdiction.
- b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Yes No
- c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. Yes No
- d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. Yes No
- e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. Yes No
- f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). Yes No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:

- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. Yes No
- b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. Yes No
- c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. Yes No

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

B.2.a.: The current volume reduction standard in the Land Development Code for new development projects will be amended to meet the permit requirements for volume, TSS and TP. The City Engineer will be the lead with assistance from the Public Utilities Department, Planning Department and other Engineering staff. New Code language must go through the Planning Commission and City Council approval processes. The process will be completed within 12 months of the date permit coverage is extended.

B.3.a.1: The City's Land Development Code has a permanent stormwater design checklist. Applicable checklist items are required to be met for projects installing permanent stormwater treatment practices. The checklist does not include the following: a) Areas which industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA and d) Areas which high levels of contaminants in soil or groundwater will be mobilized by infiltrating stormwater. The Land Development Code/Checklist will be amended to include these items within 12 months of the date permit coverage is extended.

B.3.a.2: The City's Land Development Code has a permanent stormwater design checklist. Applicable checklist items are required to be met for projects installing permanent stormwater treatment practices. The checklist does not include: 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, and d) areas which soil infiltration rates are more than 8.3 inches per hour. The Land Development Code/Checklist will be amended to include these items within 12 months of the date permit coverage is extended.

B.3.a.3: The City's Land Development Code will be amended to include the exceptions for linear projects as detailed in the Permit (Part III.D.5.a(3)(b)). This will occur within 12 months of the date permit coverage is extended.

B.4.: The City's Land Development Code does not contain language related to mitigation provisions. The Land Development Code will be amended to include mitigation provisions as required by the MS4 Permit. This will occur within 12 months of the date permit coverage is extended.

B.5: The City's Land Development Code language related to long-term maintenance of BMPs does not meet the requirements of the MS4 permit. The Land Development Code and/or Stormwater System Use Code Ordinance will be amended to include a legal mechanism for the long-term maintenance of BMP's and the specific MS4 permit requirements. This will occur within 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:

Portions of ERPs are scattered within ordinance language, tracking tools, inspection reports, illicit discharge program and internal processes that are not specifically written. Within 6 months of the date permit coverage is extended, Public Utilities staff will review existing information and compare it to the requirements in the MS4 permit.

The City of St. Cloud's wastewater pretreatment program has an MPCA approved ERP in place that will be used as a model for creating formal ERPs meeting the requirements of this permit. Within 12 months of the date permit coverage is extended, written ERP's will be finalized to enforce and require compliance with the Regulatory Mechanisms required by this permit.

B. Describe your ERPs:

Ordinance/Code Language:

-Violations and enforcement section related to illicit discharge violations and construction site non-compliance.

-Language includes right of entry, stormwater service suspension, stop work orders, permit revocation, abatement, show cause hearing process, administrative fines, criminal penalties and recovery of costs.

Inspection Reports:

-The City uses various tracking documentation tools, inspection reports and violation letters depending on what is being inspected and why. Procedures for using these tools are not formally written.

Illicit Discharge Program:

-A program document exists that describes the roles of different departments and program goals. This document can be used a guide when writing the ERPs.

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

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

The stormwater system map and inventory is managed using GIS. City project as-built information is entered into the GIS system by City staff and/or a consultant. Management, oversight and QA/QC of the GIS system are performed by a consultant. Attributes and system features are continuously reviewed by Engineering and Utilities staff for updates and corrections. Most minor corrections and updates are completed by City staff.

A proposed GIS layer is used to see information from City projects under construction prior to as-builts being completed allowing them to be entered into City inspection and maintenance programs quickly. Corrections are made after as-builts are entered. Updates and edits made in GIS are synced with the City's intranet GIS website and various web based applications.

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

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

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

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

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

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. Yes No
2. A geographic coordinate. Yes No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. Yes No

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

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

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

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

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

A. MCM1: Public education and outreach

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

The City's current education program is implemented through two approaches: 1) The Central MN Water Education

Alliance (CMWEA); and 2) Direct City modes.

1) CMWEA, as described in the partnership section, is utilized to meet all or part of the established BMPs shown below. CMWEA is dedicated to developing and implementing educational programs that encourage individuals in Central Minnesota to protect water resources by increasing their knowledge and making simple behavior changes. CMWEA is operated through membership dues, member staff participation, grants, sponsorship and in-kind support. The annual education program has consisted of:

- Media ad campaign based on annual top 10 list of high priority water protection topics chosen by the members which includes various print media, radio ads, videos on local cable channels and billboard
- High School TV Ad Contest (discontinued after sixth year due to cost/benefit)
- Social Media campaign including Facebook and the CMWEA website that displays the top 10 list, blog, member contact information, promotional tools, as well as, education outreach and information with links
- Traveling Education Booth/Library used at several area events, workshops and educational handouts including brochures, native seed packets, member information, etc.
- Rain barrel and compost bin promotion and sales

2) Direct City modes of education. In addition to CMWEA, the City of St. Cloud implements an extended education program and intends to implement a similar program which may include the following:

- Distribution of material via the City newsletter, cable access and website. (Material generated from CMWEA is often used)
- Targeted education needs as identified by City staff not covered through CMWEA
- A public opinion survey conducted twice in the first MS4 permit cycle (will be discontinued this permit cycle)
- Presentations and tours as requested by local groups and organizations
- Participation in local water festivals
- Providing education through public involvement opportunities such as a stormdrain marking program, local events and trade show
- Illicit discharge reporting education and information
- Construction site erosion and sediment control education via the City's website, brochures, handouts and presentations
- Post construction stormwater management education via meetings during the plan review and permitting processes
- Internal education program conducted for all City staff

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
Coordination of Education Program	<p>BMP Description: The City will be aware of educational efforts of other groups in the St. Cloud area and participate in coordinated education efforts when appropriate. Initial coordination is completed. This BMP is now implemented through the new CMWEA BMP.</p> <p>Measureable Goals & Timeframes Past schedules are complete. Coordination now takes place through CMWEA – see below BMPs to be implemented for new goals and timeframes.</p> <p>Annually review partnerships/coordination outside of CMWEA.</p>
Implementation and Evaluation of Education Program	<p>BMP Description: The City will continue to implement an education program geared to general public awareness and specific needs related to each minimum control measure. Implementation of the City's education program takes place through CMWEA and direct City modes as described in the following BMPs.</p>

	<p>During the City's yearly SWPPP review, specific education needs will be identified and reviewed. Target audiences will be discussed.</p> <p>Measureable Goals & Timeframes Annually review entire education program. One education message distributed/used annually for each minimum control measure.</p>
Distribute Education Material	<p>BMP Description: The City uses multiple methods to distribute educational materials including direct mail, local cable access and the City website. As specific needs are identified, distribution of audience-specific and situation-specific materials will be considered. This BMP will continue in addition to education material distributed through CMWEA.</p> <p>Measureable Goals & Timeframes Slides will be displayed on local cable access (minimum of ten different slides) and updated annually. Amount of information available on the City website. Website information will be updated annually. Annually, one direct mail education will be sent. Annually, the program will be evaluated and appropriate revisions made.</p>
Public Education Program	<p>BMP Description: The City used a phased approach in the first permit cycle to educate the public, school age children, homeowners, pet owners and car owners.</p> <p><u>Completed and will not continue</u> Public opinion survey</p> <p><u>To be implemented through CMWEA</u> New target audience identification High priority issues to be emphasized</p> <p>Measureable Goals & Timeframes The below will continue to be implemented under this BMP: Participate in local waterfestivals annually. Presentations and facility tours provided upon request.</p>
Illicit Discharge Detection Education Program	<p>BMP Description: Illicit discharge detection and elimination information is available on the City's website, local cable channel 19 and distributed through CMWEA. Specific education is developed as needed. Information regarding reporting IDDE's is available on the City's website. This BMP will continue in addition to education material distributed through CMWEA.</p> <p>Measureable Goals & Timeframes Annually provide education on the City's website and local cable channel Annually, this program will be reviewed for additional needs and gaps with the CMWEA education program.</p>
Construction Site Runoff Education Program	<p>BMP Description Education related to the City's land disturbance permit and construction stormwater runoff BMPs are on the City's website and available where permits are picked-up. Construction stormwater requirements are presented during the City's excavator training classes. Erosion, sediment control and stormwater BMPs are discussed at public improvement project preconstruction meetings.</p> <p>Measureable Goals & Timeframes The measurable goals and timeframes of this BMP are updated</p>

	<p>for clarity:</p> <p>Discuss erosion, sediment control and stormwater BMPs at all public improvement project preconstruction meetings.</p> <p>Stormwater presentations are included at the City's excavator training classes.</p> <p>Educational handouts regarding the land disturbance permit and erosion/sediment control BMPs available on the City's website and at City Hall.</p> <p>Annually, education material will be reviewed and updated with the most current information.</p>
<p>Post-Construction Stormwater Management Education Program</p>	<p>BMP Description Education related to the City's post construction design standards and requirements are made available on the City's website, as requested and during plan review meetings. The City uses and refers to the MN Stormwater Manual as the main tool for design guidance and recommendations.</p> <p>Measureable Goals & Timeframes The measurable goals and timeframes of this BMP are updated for clarity:</p> <p>Provide the City's design review checklist as requested and post on the City's website.</p> <p>City staff responds to 100% of post-construction design questions.</p> <p>Building permit applications reviewed for meeting the City's post construction stormwater requirements.</p>
<p>Pollution Prevention/Good Housekeeping for Municipal Operations Education</p>	<p>BMP Description Internal education is provided annually. This established BMP was moved to MCM 2 (adopt-a-pond), MCM 3 (Internal IDDE Education), and MCM 6 (internal education). See those BMP sections for details.</p>
<p>BMP categories to be implemented</p>	<p>Measurable goals and timeframes</p>
<p>Central Minnesota Water Education Alliance (CMWEA)</p>	<p>BMP Description: Continued membership in the Central Minnesota Water Education Alliance (CMWEA) and comply with the membership agreement.</p> <p>Measureable Goals & Timeframes Within 2 months of receiving the annual CMWEA membership agreement, it will be signed and returned to CMWEA.</p> <p>Annually renew CMWEA membership and sustain membership requirements.</p> <p>Annual participation in CMWEA to ensure it meets the needs of our MS4.</p>
	<p>BMP Description: Continued membership in the Central Minnesota Water Education Alliance (CMWEA) and support the use of the website</p> <p>Measureable Goals & Timeframes Continue to promote and use the CMWEA website as the main education outlet with a goal of reaching 50,000 unique hits.</p> <p>CMWEA will add specific illicit discharge recognition and reporting to its website.</p> <p>Annually, provide the link on the City's local website to CMWEA's website.</p>

CMWEA: Website

	<p>Within 3 months of all members having an approved SWPPP document, the website will be updated on recognition and reporting of illicit discharges; the City will provide information to CMWEA as requested.</p> <p>Twice a year review and update the website with new, relevant information.</p>
<p>CMWEA: Education Campaign</p>	<p>BMP Description: Included in the membership, CMWEA will implement an education campaign/program annually.</p> <p>CMWEA annually reviews program elements to ensure the campaign meets the high priority needs of members and covers new education topics. The campaign is also adjusted to achieve the highest education value by reviewing different marketing strategies and education opportunities to impact intended target audiences. Therefore, CMWEA's education program changes over time.</p> <p>Measureable Goals & Timeframes Representation at three area events annually.</p> <p>CMWEA has a goal of providing education through three different marketing/campaign tactics.</p> <p>CMWEA provides at least two opportunities for member input on the annual campaign.</p> <p>Annually, provide input on CMWEA's education campaign to ensure the City's high priority needs are emphasized.</p> <p>Within 6 months of all members having an approved SWPPP document, the current education program elements will be reviewed, updated and modified. This process has started with the reissuance of this permit.</p>
<p>Permanent Treatment BMP Education</p>	<p>BMP Description: Education will be distributed to property owners within Capital Improvement Project areas where permanent stormwater treatment practices are installed. Pre-construction mailings will contain basic information as appropriate. Post-construction communication will provide more details about function and maintenance. Education material and timing of distribution will be tailored based on the project and BMPs installed.</p> <p>Measureable Goals & Timeframes Annually, review capital improvement project list for education needs and document distributed material.</p> <p>Annually, supply targeted, specific education to project areas.</p>
<p>Education Program Evaluation</p>	<p>BMP Description: The entire education program will be reviewed for effectiveness, target audiences and needs for the following year(s). Public feedback will be considered during the review.</p> <p>Measureable Goals & Timeframes Annually review the education program and document review outcomes and future needs.</p>

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

Stormwater Compliance Specialist

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees

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

The City provides an opportunity for the public to review and comment on the Stormwater Pollution Prevention Program at a Public Meeting annually. This meeting goes through the public notice process.

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

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

Established BMP categories	Measurable goals and timeframes
Annual Meeting	<p>BMP Description: An annual public meeting is held (generally March or April) allowing members of the public to provide input and comments on the adequacy of the City's SWPPP. The meeting follows the public notice process. Comments and input are documented and considered when reviewing the SWPPP annually.</p> <p>Measureable Goals & Timeframes Hold one annual public meeting. Goal of at least two attendees. Prior to May each year, a public meeting date will be scheduled and the appropriate public notice process followed. Document the City's response on comments provided. Within one week of receiving comments or input, an appropriate response will be sent and/or initiated.</p>
Stormdrain Marking Program	<p>BMP Description: The City has stormdrain marking kits available for use by groups or individuals. Supplies and maps are provided.</p> <p>Measureable Goals & Timeframes Fifteen volunteers annually. Five hundred stormdrains marked annually. Annually keep kits supplied, document success of the program and advertise this program on the City's website.</p>
Adopt-A-Pond Program	<p>BMP Description: The City has an Adopt-A-Pond program to assist with garbage pick-up at high priority ponds. An additional education component will be added this permit cycle through direct mail to property owners within the watersheds of the adopted ponds. Education will include basic stormwater and trash pick-up information along with recognition of the program's volunteers.</p> <p>Measureable Goals & Timeframes At least five ponds remain adopted annually. One direct mail sent to property owners within drainage areas of adopted ponds.</p>
BMP categories to be implemented	Measurable goals and timeframes
Online Availability of the SWPPP Document	<p>BMP Description: Provide an electronic document of the Stormwater Pollution Prevention Program document on the City's website to allow anytime access.</p> <p>Measureable Goals & Timeframes Within one month of receiving permit coverage, the new SWPPP will be uploaded to the City's website. Annually, the link will be checked and SWPPP updated if</p>

3. Do you have a process for receiving and documenting citizen input? Yes No

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

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

Stormwater Compliance Specialist

C. MCM 3: Illicit discharge detection and elimination

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

The City has an ordinance that prohibits illicit discharges and connections. The ordinance is reviewed annually for effectiveness and changes needed. Illicit discharge detection is incorporated into inspections of outfalls, ponds, stockpiles and all other stormwater treatment BMPs. Staff also looks for illicit discharges during routine maintenance activities.

Field staff receives training on procedures to recognize and report illicit discharges for further investigation. Field staff receive additional training and information because of job duties. General awareness education is distributed to the public, target businesses and through the stormdrain marking program.

The City has a detailed GIS map of the stormwater system. The map includes the MS4 system including flow direction of pipe, surface flow, outfalls, stormwater treatment BMPs and receiving waters. The map, desktop assessment and documented history are tools used to create annual prioritized inspections.

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

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

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

C.2.e-g: Procedures are outlined in the illicit discharge section of the ordinance, the IDDE program and on the tracking forms used. Within 6 months of the date permit coverage is extended, current City procedures will be reviewed for gaps, clarity and areas not meeting permit requirements. Within 9 months of the date permit coverage is extended, clear formal procedures will be written meeting the permit requirements of these sections. Within 12 month of the date permit coverage is extended, new procedures will be finalized, distributed to appropriate departments and implemented.

C.2.h: Within 12 months of the date permit coverage is extended, all written ERP's required by this permit will be finalized, IDDE included.

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	<p>BMP Description Regulatory mechanism that effectively prohibits non-stormwater discharges.</p> <p>Measureable Goals & Timeframes Annually review and revise to ensure ordinance continues to meet the needs of the City and legal requirements.</p>
Stormwater System Map	<p>BMP Description The detailed GIS map includes the MS4 system including flow direction of pipe, surface flow, outfalls, stormwater treatment BMPs and receiving waters.</p> <p>Measureable Goals & Timeframes Annually review and update the map to reflect system changes and correct errors.</p>
Routine System Inspections	<p>BMP Description Staff is trained to look for illicit discharges and connections during routine maintenance, inspections, follow-up inspections on customer calls and other field work. Discoveries are reported to the Stormwater Compliance Specialist and appropriate action follows.</p> <p>Measureable Goals & Timeframes Document potential illicit discharges and connections discovered. Illicit discharges and connections discovered receive appropriate follow-up. Annual review of effectiveness. New procedures and ERP's created will be integrated into the program after they are finalized.</p>
Internal IDDE Education	<p>BMP Description Annually all City employees receive education related to illicit discharge recognition and reporting. Education is tailored to the department's role within the City. Public Works staff receives more detailed education than other staff.</p> <p>Measureable Goals & Timeframes All field staff receives training. Annual review of effectiveness.</p>
BMP categories to be implemented	Measurable goals and timeframes
Procedures & ERP's	<p>BMP Description Procedures and ERP's, including required documentation related to illicit discharge response, investigation, locating, elimination, emergency response and enforcement will be created and implemented.</p> <p>Measureable Goals & Timeframes Formal procedures and ERP's created and implemented. Within 6 months of the date permit coverage is extended, current City procedures & ERP's will be reviewed. Within 9 months of the date permit coverage is extended,</p>

procedures and ERP's will be drafted.

Within 12 months of the date permit coverage is extended, procedures and ERP's will be finalized, distributed to appropriate departments and implemented.

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:

Stormwater Compliance Specialist

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

The City has an ordinance section with requirements related erosion and sediment control and construction site runoff control during land disturbing activities. The ordinance also has an enforcement section. The ordinance is reviewed annually for effectiveness and changes needed. The City requires a land disturbance permit for all new single family home lots and activities that disturb land greater than or equal to 5,000 square feet. All permitted sites are required to submit an erosion and sediment control plan for review before construction begins. A checklist is used when reviewing plans. Non permitted sites are still subject to ordinance requirements but are not required to go through the permit review process.

Inspections of active construction sites occur routinely and if complaints are received. Inspection information, notes, violations, follow-up and enforcement is documented electronically in an inspection log. Inspection reports and violation notices are created and sent to permittees following inspections.

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.

2.a: A checklist is used for site plan review but written procedures for the review process has not been created. Within 6 months of permit coverage being extended, current procedures will be reviewed. Within 9 months of permit coverage being extended, draft procedures will be written for internal review. Within 12 months of permit coverage being extended,

procedures for site plan review will be finalized and implemented. The existing checklist will be integrated into these procedures.

2.c: The City has an internal process and tracking mechanism for receipt and consideration of reports of noncompliance or other information related to construction activity submitted by the public. However, written procedures do not exist. Within 6 months of permit coverage being extended, current procedures will be reviewed. Within 9 months of permit coverage being extended, draft procedures will be written for internal review. Within 12 months of permit coverage being extended, these procedures will be finalized and implemented.

2.d.1-3: The City has an internal process for identifying priority sites and frequency for construction site inspections, however, written procedures do not exist. Within 6 months of permit coverage being extended, current procedures will be reviewed. Within 9 months of permit coverage being extended, draft procedures will be written for internal review. Within 12 months of permit coverage being extended, procedures for identifying priority sites and inspection frequency of construction sites, including responsible staff, will be finalized and implemented.

- 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	<p>BMP Description Regulatory mechanism for erosion, sediment control and pollution prevention during land disturbing activities.</p> <p>Measureable Goals & Timeframes Review and revise annually to ensure needs of the City and legal requirements are met.</p>
Permit System	<p>BMP Description A land disturbance permit is required for all new single family home lots and activities that disturb greater than or equal to 5,000 square feet, including MS4 projects. All permitted sites are required to submit an erosion and sediment control plan for review. A checklist is used during the review process. Special conditions are added to permits as needed.</p> <p>Measureable Goals & Timeframes Process all applications within 30 days of receipt. Number of site plans reviewed.</p>
Inspection Program	<p>BMP Description Inspections are conducted on a routine basis. A log is kept summarizing inspections. Inspection reports and violation letters are sent if necessary. An inspection checklist ensures consistent inspections.</p> <p>Measureable Goals Two inspections per permitted site. Number of inspections per year. Annually review checklist for updates.</p>
Reports of Noncompliance	<p>BMP Description An internal process and tracking mechanism is used for receipt and consideration of reports of noncompliance submitted by the public. Appropriate follow-up occurs through inspections and/or direct communication. Standard operating procedures will be created and implemented – see below BMP to be implemented.</p> <p>Measureable Goals & Timeframes Staff will follow-up on all reports of noncompliance in a timely</p>

	manner. Maintain a log of items submitted by the public.
BMP categories to be implemented	Measurable goals and timeframes
Develop Program Procedures	BMP Description Written procedures will be created for site inspections, site plan review and reports of noncompliance.
	Measureable Goals & Timeframes Within 6 months, current procedures will be reviewed. Within 9 months, new procedures will be drafted. Within 12 months, new procedures will be finalized and implemented. Annually review and update procedures.
Emergency Response Procedures	BMP Description ERP's, including required documentation, related to construction site stormwater runoff control will be created and implemented.
	Measureable Goals & Timeframes Within 6 months of the date permit coverage is extended, current City procedures & ERP's will be reviewed. Within 9 months of the date permit coverage is extended, ERP's will be drafted. Within 12 months of the date permit coverage is extended, ERP's will be finalized, distributed to appropriate departments and implemented.

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

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 post construction stormwater management requirements in the Land Development Code. Requirements include volume reduction for all new and redevelopment projects, rate control standards, water quality standards and design information. The City's Engineering Department reviews building permit applications to ensure compliance. A detailed checklist is used during review. The City's Planning Department ensures compliance with the City's environmentally sensitive requirements. Permanent treatment BMP design information is stored electronically.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? Yes No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a) including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? Yes No
- b. All supporting documentation associated with mitigation projects that you authorize? Yes No
- c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? Yes No
- d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? Yes No

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

E.2: A checklist is used for site plan review but written procedures for the site plan review process have not been created. Within 6 months of permit coverage being extended, current procedures will be reviewed. Within 9 months of permit coverage being extended, draft procedures will be written for internal review. Within 12 months of permit coverage being extended, procedures for site plan reviews will be finalized and implemented.

E.3.a: A checklist is used as a guide when documenting supporting information; however, formal procedures have not

been created. Within 6 months of permit coverage being extended, current procedures will be reviewed. Within 9 months of permit coverage being extended, draft procedures will be written for internal review. Within 12 months of permit coverage being extended, procedures for documenting supporting information related to MCM 5 will be finalized and implemented.

E.3.b: City staff will develop procedures for documentation associated with mitigation projects. Procedures will be created after ordinance language related mitigation is drafted. These procedures will be finalized within 12 months of permit coverage being extended.

E.3.c: City staff will develop procedures for documentation associated with payments received related to mitigation projects. Procedures will be created after ordinance language related to mitigation is drafted. These procedures will be finalized within 12 months of permit coverage being extended.

E.3.d: City staff will develop procedures for documentation associated with legal mechanisms regarding long-term maintenance of structural BMPs implemented through MCM 5 requirements. Procedures will be created after ordinance language related to long-term maintenance is drafted. These procedures will be finalized within 12 months of permit coverage being extended.

- 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
Regulatory Mechanism	<p>BMP Description Regulatory language exists within the Land Development Code for volume control requirements, rate and water quality control standards.</p> <p>Measurable Goals & Timeframes Review and revise annually to ensure needs of the City and legal requirements are met.</p>
Plan Review	<p>BMP Description Projects are reviewed by the City's Engineering Department as part of the building permit review process to ensure Land Development Code requirements are met. A review checklist is used when reviewing plans.</p> <p>Measurable Goals & Timeframes Total site plans reviewed annually.</p>
Encourage BMP Variety	<p>BMP Description City and private projects are encouraged to explore a variety of structural and non-structural BMPs. The City uses the MN Stormwater Manual and the City's checklist for issuing guidance.</p> <p>Measurable Goals & Timeframes Number of specific BMPs implemented.</p>
BMP categories to be implemented	Measurable goals and timeframes
Regulatory Mechanism Update	<p>BMP Description Revise the Land Development Code/City ordinance to meet permit requirements.</p> <p>Measurable Goals & Timeframes Complete within 12 months of permit coverage. Review and revise annually as needed.</p>
Site Plan Review Procedures and Documentation	<p>BMP Description Written procedures will be created for site plan review. Supporting documentation will be stored electronically.</p> <p>Measurable Goals & Timeframes</p>

	<p>Within 6 months, current procedures will be reviewed.</p> <p>Within 9 months, new procedures will be drafted.</p> <p>Within 12 months, new procedures will be finalized and implemented.</p> <p>Annually review and update procedures.</p>
Mitigation Procedures and Documentation	<p>BMP Description Written procedures will be created for the mitigation process and use of payments received. Supporting documentation, including mitigation project details and tracking of payments received, will be stored electronically.</p> <p>Measureable Goals & Timeframes Within 6 months, current procedures will be reviewed. Within 9 months, new procedures will be drafted. Within 12 months, new procedures will be finalized and implemented. Annually review and update procedures.</p>
Long-Term Maintenance of Private BMPs and Documentation	<p>BMP Description City ordinance will be updated to include language related to the establishment of legal mechanism(s) related to long-term maintenance of private BMPs as described in the permit.</p> <p>Written procedures will be created associated with the implementation and enforcement of the legal mechanism(s). Legal mechanism(s) and supporting documentation will be stored electronically</p> <p>Measureable Goals & Timeframes Within 6 months, current procedures and the ordinance will be reviewed. Within 9 months, new procedures and the ordinance update will be drafted. Within 12 months, new procedures and the updated ordinance will be finalized and implemented. Annually review and update the ordinance and procedures.</p>

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

Stormwater Compliance Specialist

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

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

The City of St. Cloud currently provides annual stormwater training for all employees and specific training for some job duties. Streets and parking lots are swept twice annually, with additional sweeping in priority areas. Inspections are completed annually for all structural pollution control devices, stockpiles, storage and material handling facilities. Additionally, annual inspections are performed for a minimum of 20% of all outfalls, sediment basins and ponds. Repairs are performed for items identified during annual inspections. Inspections and repairs are documented in the GIS and access database systems and records retained. The inspection schedule is evaluated and adjusted annually.

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:

Within 3 months of extension of permit coverage, a survey will be developed and distributed to managers of all city-owned facilities to establish the full list of facilities covered under the permit. Within 6 months of extension of permit coverage, the

results of the survey will be compiled, resulting in the complete facilities inventory. Within 9 months of extension of permit coverage, the facilities will be mapped to determine receiving water. Within 12 months of extension of permit coverage, the list will be evaluated and prioritized based on sensitivity of receiving water and other relevant considerations. BMPs will be developed and implemented to reduce pollutants in stormwater discharges from inventoried facilities and applicable municipal operations as appropriate.

- 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
Internal Training Program	<p>BMP Description Provide annual training for employees specific to job duties.</p> <p>Measureable Goals & Timeframes Annually.</p>
Street Sweeping	<p>BMP Description Sweep city streets and parking lots with increased frequency in priority areas.</p> <p>Measureable Goals & Timeframes Twice annually.</p>
Inspections, Maintenance and Repairs	<p>BMP Description Inspect structural pollution control devices, stockpiles, storage and materials handling areas, outfalls, sediment basins and ponds. Repair and maintain system in a timely manner based on inspection results.</p> <p>Measureable Goals & Timeframes Inspect all structural pollution control devices, stockpiles, storage and materials handling areas annually. Inspect at least 20% of outfalls, sediment basins and ponds annually. Repair or maintain items identified in inspections in order of priority within one year of discovery; if not feasible within one year, document reason and establish appropriate schedule. Report and record inspection and repair records, and appropriately adjust inspection frequency annually.</p>
BMP categories to be implemented	Measurable goals and timeframes
Facility Inventory	<p>BMP Description Develop and maintain an inventory of City-owned and operated facilities that have stormwater discharges.</p> <p>Measureable Goals & Timeframes</p>

	<p>Within 3 months of extension of permit coverage, a survey will be developed and distributed to managers of all city-owned facilities to establish the full list of facilities covered under the permit.</p> <p>Within 6 months of extension of permit coverage, the results of the survey will be compiled, resulting in the complete facilities inventory.</p> <p>Within 9 months of extension of permit coverage, the facilities will be mapped to determine receiving waters.</p> <p>Within 12 months of extension of permit coverage, the list will be evaluated and prioritized based on sensitivity of receiving waters and other relevant considerations.</p> <p>Evaluate inventory and applicable BMP's annually.</p>
Pond Assessment Procedures and Schedule	<p>BMP Description Develop procedures and schedule for determining TSS and TP treatment effectiveness of all City-owned/operated ponds constructed which are used for collection and treatment of stormwater.</p> <p>Measureable Goals & Timeframes By the end of year two, procedures for determining TSS and TP treatment effectiveness will be developed.</p> <p>In year three, prioritize and develop schedule to assess ponds, and determine budget requirements.</p> <p>In year four, assess at least five ponds and adjust procedures appropriately.</p> <p>In year five, implement schedule with a goal of assessing 20% of the ponds.</p>
Inspection of Stockpiles, Storage and Material Handling Facilities	<p>BMP Description Conduct inspections of stockpiles, and storage and materials handling facilities to determine maintenance needs and proper function of BMPs.</p> <p>Measureable Goals & Timeframes Quarterly, perform inspections of stockpiles and storage/materials handling facilities.</p>
Documentation	<p>BMP Description Document the details of inspections, adjustments to inspection frequency, description of maintenance, including dates, pond sediment excavation (including Pond ID, volume of sediment removed, results of sediment testing, location of final sediment disposal), and employee training events including topics, attendees, and dates.</p> <p>Measureable Goals & Timeframes Annually, confirm that each item listed above is documented and filed appropriately.</p>

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 Yes No

sources?

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:

F6: The City will develop procedures and a schedule for determining TSS and TP treatment effectiveness of all City-owned/operated ponds constructed and used for collection and treatment of stormwater according to the schedule mentioned in the BMP table above.

F7: The City will adjust frequency of inspections of stockpiles, and storage and materials handling facilities to determine maintenance needs and proper function of BMPs to a quarterly schedule.

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

Stormwater Compliance Specialist

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

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? Yes No
- 1. If **no**, continue to section VII.
 - 2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

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

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

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? Yes No
- 1. If **no**, this section requires no further information.
 - 2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.
- This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program

None.