

From: [*MPCA_PCA MS4 Permit Program](#)
To: [Nicole Lehman](#); [*MPCA_PCA MS4 Permit Program](#); [Stangl, Rachel \(MPCA\)](#)
Cc: [Travis Fristed](#); [Phil Olson](#); [Stangl, Rachel \(MPCA\)](#)
Subject: RE: City of Grant MS4 SWPPP Document
Date: Tuesday, December 31, 2013 12:11:13 PM

Thank you for submitting your Municipal Separate Storm Sewer System (MS4) Stormwater Pollution Prevention Program (SWPPP) document and application for coverage under the National Pollutant Discharge Elimination System/State Disposal System General Permit MNR040000 for MS4s (Permit). The staff of the Municipal Division at the Minnesota Pollution Control Agency (MPCA) has received your SWPPP document and application materials, and will contact you regarding any questions or comments.

Please continue to operate under the terms of the MS4 permit issued in March 2006; coverage cannot be extended under the new Permit (effective August 1, 2013) until the MPCA has completed the public noticing of your SWPPP Document and application materials and the MPCA Commissioner has made a final determination to approve or deny permit coverage. More information on the public notice process for MS4 SWPPP documents is available at www.pca.state.mn.us/bkzqa7d.

Please let me know if you have any questions.

Thanks,

Rachel Stangl
rachel.stangl@state.mn.us
651-757-2879

From: Nicole Lehman [mailto:NLehman@mcghiebetts.com]
Sent: Monday, December 30, 2013 5:48 PM
To: *MPCA_PCA MS4 Permit Program; Stangl, Rachel (MPCA)
Cc: Travis Fristed; Phil Olson
Subject: City of Grant MS4 SWPPP Document

MPCA,
On behalf of the City of Grant, attached please find the MS4 SWPPP Application for Reauthorization, Illicit Discharge and Post-Construction Regulatory mechanisms, and TMDL spreadsheet. Please contact me if you have any questions or concerns.

Thank you.

Nicole Lehman
Environmental Scientist
d: 507-289-3919 | c: 507-208-9939
McGhie & Betts, a Division of WSB & Associates, Inc. | 1648 Third Avenue SE | Rochester, MN 55904



McGhie & Betts has joined [WSB & Associates, Inc.](#), a Minnesota-owned consulting firm serving a broad array of clients with civil engineering, planning, landscape architecture, environmental, and construction services.

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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: City of Grant *County: Washington
(city, county, municipality, government agency or other entity)
*Mailing address: P.O. Box 577
*City: Willernie *State: MN *Zip code: 55090
*Phone (including area code): (763) 512-5245 *E-mail: polson@wsbeng.com

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

*Last name: Olson *First name: Phil
(department head, MS4 coordinator, consultant, etc.)
*Title: City Engineer
*Mailing address: 701 Xenia Avenue South, Suite 300
*City: Minneapolis *State: MN *Zip code: 55416
*Phone (including area code): (763) 512-5245 *E-mail: polson@wsbeng.com

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

Last name: Lehman First name: Nicole
(department head, MS4 coordinator, consultant, etc.)
Title: Environmental Scientist (WSB & Associates, Inc.)
Mailing address: 1648 Third Avenue SE
City: Rochester State: MN Zip code: 55904
Phone (including area code): (507) 289-3919 E-mail: nlehman@mcghiebetts.com

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: Tom Carr
(This document has been electronically signed)

Title: Mayor Date (mm/dd/yyyy): December 30, 2013

Mailing address: P.O. Box 577

City: Willernie State: MN Zip code: 55090

Phone (including area code): (651) 303-8001 E-mail: mayor@cityofgrant.com

Note: *The application will not be processed without certification.*

Stormwater Pollution Prevention Program Document

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

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

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
<i>Rice Creek Watershed District (RCWD) MS4: Coordinates educational efforts to provide focused outreach to residents, young people, municipalities, businesses and developers. Permitting review and cost-share assistance for installation of best management practices is also an integral part of collaboration they provide to the City.</i>	MCM 1, 2
<i>Valley Branch Watershed District (VBWD) MS4: Coordinates education efforts to provide opportunities for public participation and involvement by providing grants for water quality improvements, encourages participation in the Citizen Advisory Committee and offers volunteer opportunities for water quality monitoring. In addition, VBWD has a permitting process for review of all development and redevelopment projects within the City.</i>	MCM 1, 2

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

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? Yes No

1. If **yes**:

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

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

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

Citation:

- City of Grant Municipal Code: City Ordinance No. 2011-25 and 2008 Comprehensive Plan Update, Section VI. Surface Water Management Plan, E. Policies and Goals, Policy No.4. Erosion and Sediment Control*

- Valley Branch Watershed District: Rule 6 Illicit Discharge & Connection*

Direct link:

- City of Grant Municipal Code: not available electronically and <http://www.cityofgrant.us/comprehensive>*
- Valley Branch Watershed District: <http://www.vbwd.org/RulesRegs/2013AdoptedRules.pdf>*

Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg*.

2. If no:

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

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:.

1. City of Grant Municipal Code:

- Chapter 30. Subdivisions, Article III. Minimum Design Standards, Division 1. Generally, Section 30-103. Land Requirements
- 2008 Comprehensive Plan Update, Section VI. Surface Water Management Plan, E. Policies and Goals, 4. Erosion and Sediment Control
- Ordinance 2007-02 – Land Reclamation and Land Grading – Permits required
- Resolution 2009-10

2. Rice Creek Watershed District: Rule C Stormwater Management Plans and Rule D.2(a)–(c) Erosion & Sediment Control Plans Regulation

3. Brown's Creek Watershed District: Rule 3.2 Erosion Control Regulation

4. Valley Branch Watershed District: Rule 2 Stormwater Management, Standard 6 and Rule 3 Erosion and Sedimentation Control, Standard 2

5. Carnelian-Marine-Saint Croix Watershed District: Rule 2.2 Stormwater Management & Rule 3.2 Erosion & Sediment Control

Direct link:

1. City of Grant Municipal Code:

- <http://www.cityofgrant.us/CH30Subdivisions>
- <http://www.cityofgrant.us/comprehensive>
- http://cityofgrant.com/Documents/ordinances/Ord_2007_02.pdf

2. Rice Creek Watershed District: http://www.ricecreek.org/vertical/Sites/%7BF68A5205-A996-4208-96B5-2C7263C03AA9%7D/uploads/FINAL_ADOPTED_RULE_06-26-2013.pdf

3. Brown's Creek Watershed District: http://www.bcwd.org/BCWD_rules_07.pdf

4. Valley Branch Watershed District: <http://www.vbwd.org/RulesRegs/2013AdoptedRules.pdf>

5. Carnelian-Marine-Saint Croix Watershed District: http://www.cmscwg.org/sites/default/files/Rules_Adopted_3-1-10.pdf

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

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

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

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

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

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

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

The City intends to revise City Code Subdivisions, Section 30-103 (c) to incorporate by reference the current NPDES Construction Stormwater Permit standards for all land disturbing activities that disturb more than 50 cubic yards to 5,000 cubic yards (requiring a grading permit) and 5,000 cubic yards or greater that would require a conditional use permit. The update will be drafted in 2014 for adoption by the City Council within 12 months of the date permit coverage is extended to the City.

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?
 Yes No

1. If **yes**:

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

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

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

Citation:

1. City Code: Zoning Section 32-341. Drainage, Resolution 2009-10, and 2008 Comprehensive Plan Update, Section VI. Surface Water Management Plan, E. Policies and Goals, Policy No.2 Stormwater Runoff Volume
2. Rice Creek Watershed District: Rule C – Stormwater Management Plans
3. Brown's Creek Watershed District: Rule 2 – Stormwater Management
4. Valley Branch Watershed District: Rule 2 – Stormwater Management
5. Carnelian-Marine-Saint Croix Watershed District: Rule 2 – Stormwater Management

Direct link:

1. City Code: <http://www.cityofgrant.us/CH32Zoning> and <http://www.cityofgrant.us/comprehensive>
2. Rice Creek Watershed District: http://www.ricecreek.org/vertical/Sites/%7BF68A5205-A996-4208-96B5-2C7263C03AA9%7D/uploads/FINAL_ADOPTED_RULE_06-26-2013.pdf

3. Brown's Creek Watershed District: http://www.bcwd.org/BCWD_rules_07.pdf
4. Valley Branch Watershed District: <http://www.vbwd.org/RulesRegs/2013AdoptedRules.pdf>
5. Carnelian-Marine-Saint Croix Watershed District:
http://www.cmscwd.org/sites/default/files/Rules_Adopted_3-1-10.pdf

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

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. Yes No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
 - a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: Yes No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
 - b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: Yes No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
 - a. Limitations
 - 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: Yes No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: Yes No
 - a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
 - 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. Yes No
4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

- a. Mitigation project areas are selected in the following order of preference: Yes No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
 - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Yes No
 - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. Yes No
 - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. Yes No
 - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. Yes No
 - f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). Yes No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. Yes No
 - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. Yes No
 - c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. Yes No

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

The City Code will be revised to include by reference the Valley Branch Watershed District and Rice Creek Watershed District's MS4 regulatory standards for post-construction stormwater management, provisions for stormwater management infiltration limitations and exceptions, provisions to restrict infiltration in sensitive areas, mitigation provisions and expanded language for regional stormwater systems. This ordinance will apply to the remaining geographic areas outside of the respective Watershed District boundaries within the City of Grant. The final ordinance language will be formally adopted and implemented within 12 months from the date MS4 permit coverage is extended to the City.

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:

ERP's for illicit discharges and connections, construction site erosion and sediment control and post-construction stormwater management will be drafted and formally adopted and implemented within 12 months from the date of MS4 permit coverage is extended to the City. The ERPs will include written procedures for internal protocols and procedures for implementing MCMs 3, 4 and 5.

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

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

The City's storm sewer inventory was completed in 2010, and is reviewed annually and revised to include new construction and reconstruction projects. Since 2010, no reconstruction or new storm sewer components have been completed. The inventory will be revised in 2014 to include new MS4 permit definitions for outfalls, ponds and structural stormwater BMPs.

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 [x] No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. [x] Yes [] No
3. Structural stormwater BMPs that are part of the permittee's small MS4. [x] Yes [] No
4. All receiving waters. [x] Yes [] No

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

The City will update the storm sewer system map and inventory within 12 months of the date permit coverage is extended to include all pipes 12 inches or greater in diameter, including the stormwater flow direction.

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

The City will review and revise (as needed) the existing storm sewer inventory to comply with the reissued MS4 permit requirements (Part III.C.1 a-d) and submit the 2009 Pond Inventory to the MPCA within 12 months from the date MS4 permit coverage is extended to the City.

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 [x] 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**:

Public education and outreach is provided in newsletters that focuses on stormwater topics including illicit discharges and erosion control best management practices. The City collaborates with the Washington Conservation District to offer public education and outreach for water quality monitoring and stormwater education for city and county staff and contractors. During the MS4 permit cycle the City plans to update the existing BMPs and implement public education information for two high priority topics (Lake St. Croix Nutrient and Bald Eagle Lake Excess Nutrients, along with illicit discharge recognition and reporting).

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
<i>City Newsletter</i>	<i>The City distributes two different newsletters that discusses stormwater related topics, both newsletters are distributed once per year to approximately 4,100 people.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Webpage updates (high priority topics)</i>	<i>The City's webpage will be updated with articles on high priority topics, such as TMDL reductions for nutrients in Lake St. Croix and excess nutrients in Bald Eagle Lake for phosphorus impairments and illicit discharge recognition/reporting in 2014. Periodic webpage updates will be completed throughout each year of the MS4 permit cycle (July 31, 2018).</i>
<i>Annual SWPPP Assessment & Annual Reporting</i>	<i>City staff will conduct an annual SWPPP assessment in preparation of each annual report. Proposed SWPPP modifications are subject to Part II.G of the MS4 permit cycle (July 31, 2018). City staff will submit the annual report to the MPCA prior to June 30th for the previous calendar year.</i>

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

Phil Olson, City Engineer

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 annually for public participation and involvement through public meetings to discuss stormwater related topics and solicits public input on the SWPPP document. City staff also participates in an annual roadside cleanup, the Washington Conservation District water monitoring program and stormwater education.

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
<i>Roadside Clean-up</i>	<i>Annually, the City organizes a roadside cleanup each spring around Earth Day to encourage local citizen involvement.</i>

<p><i>Water Monitoring Program</i></p>	<p>The City will continue to advertise the Washington Conservation District's volunteer opportunities for public participation in water quality monitoring and sediment surveys throughout county lakes and streams. During these events the public is informed about erosion control best management practices. This program will continue to be implemented throughout the MS4 permit cycle (July 31, 2018).</p>
<p><i>Washington Conservation District – Stormwater Education</i></p>	<p>Washington Conservation District offers educational programs to help city and county staff and contractors stop stormwater pollution at the source. Training courses include:</p> <ul style="list-style-type: none"> • Stormwater U – Stormwater and erosion control training is available for engineers, planners and public works staff. • Local certified contractors – workshops for summer turf maintenance and winter parking lot and road maintenance is available for contractors.
<p><i>Rice Creek Watershed District (RCWD) Public Engagement</i></p>	<p><u>Workshops</u></p> <p>The RCWD staff offers various opportunities for city residents and staff and local businesses. Workshops include:</p> <ul style="list-style-type: none"> • summer turgrass maintenance, • winter road salt maintenance, • raingarden installation and maintenance <p><u>Storm Drain Stenciling</u></p> <p>Residents interested in marking storm drains within their neighborhoods or communities are encouraged to participate in the RCWD Storm Drain Stenciling program.</p> <p><u>Clean-up Day</u></p> <p>Community clean-up days are scheduled annually to keep trash from entering local streams, rivers and lakes. These events often coincide with community raking days in the fall, which educates the public about excess nutrients that can contribute to algae blooms.</p> <p><u>Water Quality BMP Cost-Share Program (Sponsored in partnership with Blue-Thumb)</u></p> <p>RCWD provides financial incentives and technical assistance to residents who are interested in completing a water quality improvement practices such as raingarden installation, shoreline stabilization, wetland restoration or alternative paving practice. RCWD or Conservation District representative provides free site visits for residents, cities or businesses interested in installing in adopting practices that reduce erosion and stormwater runoff.</p>
<p><i>Brown's Creek Watershed District (BCWD) Public Engagement</i></p>	<p><u>Volunteer Opportunities</u></p> <p>BCWD offers volunteer opportunities for local residents to participate in their stream monitoring program, citizen advisory committed and lake elevation monitoring.</p> <p><u>Blue Thumb Cost-Share Assistance</u></p> <p>BCWD offers small grants to landowners for improvements to surface water quality in the watershed. Projects include raingardens, infiltration trenches, porous pavement, and other innovative approaches to treat stormwater runoff at the source. Projects are given higher priority due to impaired status if they demonstrate a public benefit, collaborate with other partners, provide water quality improvements, solve erosion control problems, improve wildlife habitat or use innovative methods or techniques.</p>
<p><i>Valley Branch Watershed District (VBWD) Public Engagement</i></p>	<p><u>Grant Programs</u></p> <p>In partnership with Blue Thumb the VBWD offers cost-share assistance for landscaping projects that benefit water quality.</p>

	<p>Grants include:</p> <ul style="list-style-type: none"> • <i>Individual Grants</i> – Technical assistance to plan and implement best management practices such as shoreline stabilization, gully repairs and raingarden installations are available. • <i>Community Grants</i> – technical and financial assistance is available to groups and municipalities for shoreline stabilization, gully erosion repairs and raingarden BMPs to improve surface water quality. • <i>Plant Grants</i> – Financial assistance is available to landowners for native plants and seeds for habitat and water quality projects including raingardens, stabilizing shorelines, and restoring wetlands, prairies and woodlands.
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<p><i>Carnelian-Marine-St. Croix Watershed District (CMSCWD) Public Engagement</i></p>	<p><u>Grant Programs</u></p> <p>The CMSCWD sponsors cost-share grants to residents and local governments to improve water quality and habitat in the area. Projects including lakeshore, stream bank buffer restorations, rain gardens and habitat restorations are available for funding with a priority preference given to projects that address improvements to impaired and focused watershed management areas to control non-native and invasive aquatic vegetation.</p> <p>The CMSCWD provides other opportunities for the public to become engaged in their watersheds through the Watershed Citizen Advisory Committee or any one of the Lake Home Owner's Associations.</p>
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BMP categories to be implemented	Measurable goals and timeframes
<p>SWPPP On-line</p>	<p>The City will post the SWPPP and current annual report on the City website in 2014. Staff contact information will also be added for the public to provide written comments throughout the year. Website content and all comments received will be reviewed each year of the MS4 permit cycle (July 31, 2018).</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:

Phil Olson, City Engineer

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's IDDE program was initiated in 2011 with the adoption of the illicit discharge and connection stormwater ordinance and training of two 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.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). Yes No
 - b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. Yes No
 - c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. Yes No

- d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. Yes No
- e. Procedures for the timely response to known, suspected, and reported illicit discharges. Yes No
- f. Procedures for investigating, locating, and eliminating the source of illicit discharges. Yes No
- g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. Yes No
- h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). Yes No

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

The City will incorporate internal procedures for training field staff on illicit discharge recognition, reporting and follow-up investigations that specifically states employees duties as they correlate to the permit. The City will also prepare a map of priority areas likely to have illicit discharges (based on current landuse, history of discharges, and active NPDES Industrial Stormwater permits), update internal procedures for emergency response to reported spills/discharges, and enforcement response procedures (including corrective actions). Draft ERPs will be prepared in 2014 and implemented within 12 months from the date MS4 permit coverage is extended to the City.

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
<i>IDDE Inspections</i>	<i>Annually conduct IDDE inspections concurrently with storm sewer, outfall, and ponds inspections.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Modify Employee Training Program</i>	<i>Within 12 months from the date MS4 permit coverage is extended the City will update internal procedures for training of field staff on illicit discharge recognition, reporting and follow-up to align with the new MS4 permit requirements.</i>
<i>IDDE Priority Inspection Map</i>	<i>Develop IDDE inspection map in 2014. Utilize map for inspections within 12 months from the date MS4 permit coverage is extended.</i>
<i>Written Procedures for Emergency Response</i>	<i>Draft written procedures for emergency response to non-stormwater spills and discharges in 2014. Implement final SOP within 12 months from the date MS4 permit coverage is extended.</i>
<i>Enforcement Response Procedures for Illicit Discharges</i>	<i>Develop ERP concurrently with the draft Illicit Discharge Ordinance in 2014 and formally adopt within 12 months from the date MS4 permit coverage is extended.</i>

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:

Phil Olson, City Engineer

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, 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 requires every applicant that requests a building permit, subdivision approval, or a permit for land disturbing activities on all graded areas to comply with NPDES erosion control measures and submit a stormwater management plan and/or erosion control plan to the City for review. In addition, permit applications for projects within a watershed district boundary require conformance to additional rules and standards. Stormwater management plans are required when more than 10,000 square feet of land is disturbed in Rice Creek Watershed District, more than 5,000 square feet of land or 50 cubic yards of soil is disturbed in Brown's Creek Watershed District and when more than 6,000 square feet of land is disturbed in Valley Branch Watershed District. City grading permit standards and Watershed District rules require proof that a NPDES Construction Stormwater Permit is obtained.

City Engineering staff and the Building Inspector conduct plan reviews and perform regular site inspections on all permitted sites. Cease and desist orders, notices of violations, license or permit revocation and suspensions are the enforcement tools used for non-compliance.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? Yes No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? Yes No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? Yes No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? Yes No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? Yes No
 - 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? Yes No
 - 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? Yes No
 - e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? Yes No
 - f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? Yes No
 - g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? Yes No

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

The City will add procedures for identifying priority sites and frequency for inspection. Prioritization will be based on parameters such as topography, proximity to receiving waters, soil characteristics and other factors. Draft procedures will be completed in 2014, with final implementation within 12 months from the date permit coverage is extended to the City.

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
City Grading Permit	Continue to implement as defined by City Code Subdivisions Section 30-103
BMP categories to be implemented	Measurable goals and timeframes
Stormwater Webpage updates	The City will create a stormwater webpage where the SWPPP and Annual Reports will be posted along with other stormwater related information. Links to the Watershed Districts will also be posted for quick access to their rules for specific construction stormwater permitting procedures. This update will occur within

	12 months from the date MS4 permit coverage is extended.
Update Building Dept. & City Engineer's inspection checklist	The City will update the existing erosion and sediment control checklist to meet current NPDES Construction Stormwater Permit requirements. This update will occur in 2014 and be implemented within 12 months from the date MS4 permit coverage is extended.
Develop procedures for priority site inspections	The City will develop internal procedures for identifying priority sites for inspection. Priority sites will be based on parameters such as topography, proximity to receiving water, soil characteristics and other factors. Internal procedures will be developed within 12 months from the date MS4 permit coverage is extended.

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

Jack Kramer, Building Inspector

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:

City Code defers to watershed district rules when land disturbance is proposed and plan submittals with City/Watershed District review is required when more than 10,000 square feet of land is disturbed in Rice Creek Watershed District, more than 5,000 square feet of land or 50 cubic yards of soil is disturbed in Brown's Creek Watershed District and when more than 6,000 square feet of land is disturbed in Valley Branch Watershed District. Permit applications require a plan submittal consisting of the design standards used for permanent facilities, inspection schedules, enforcement, and long-term operation and maintenance for permanent facilities.

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.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

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

Established BMP categories	Measurable goals and timeframes
City Stormwater Management Permits	The City will continue to review and issue stormwater permits (for all land disturbance), through the end of the MS4 permit cycle (July 31, 2018).
BMP categories to be implemented	Measurable goals and timeframes
Updated City Code	The City Code will be revised to include by reference the Valley Branch Watershed District and/or Rice Creek Watershed District's MS4 regulatory standards for post-construction stormwater management. This ordinance will apply to the

geographic areas outside of the respective Watershed District boundaries within the City of Grant. The final ordinance language will be formally adopted and implemented within 12 months from the date MS4 permit coverage is extended to the City.

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

Phil Olson, City Engineer

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

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

The City Engineer is primarily responsible for MCM 6 activities. Currently, the City contracts all street sweeping, storm sewer replacement, and snow plowing operations with private companies. In 2014, the City intends to expand the employee training opportunities, refine all record keeping procedures of inspections and maintenance, and written procedures for IDDE.

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:

The City of Grant does not own or operate any facilities that contribute pollutants to stormwater discharges, therefore, no facilities inventory will be completed. All municipal operations (stormsewer/culvert replacements, street sweeping, and snow plowing operations, etc. are contracted to private businesses.

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
<i>Inspect MS4 Outfalls and Ponds</i>	<i>Continue to inspect a minimum of 20% of all MS4 outfalls each year, until 100% of all MS4 Outfalls and Ponds have been inspected within the MS4 permit cycle (July 31, 2018).</i>
<i>Review inspection reports</i>	<i>Annually, evaluate inspection frequency, record keeping, and determine if maintenance, repair, or replacement is needed.</i>
<i>Employee Training</i>	<i>Annually for new and current applicable staff.</i>
BMP categories to be implemented	Measurable goals and timeframes

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? Yes No

a. If **no**, continue to 6.

b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:

- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? Yes No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? Yes No

c. Have you developed and implemented BMPs to protect any of the above drinking water sources? Yes No

6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? Yes No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? Yes No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- Addresses the importance of protecting water quality? Yes No
 - Covers the requirements of the permit relevant to the duties of the employee? Yes No
 - Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? Yes No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? Yes No

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

The City will update written procedures for conducting inspections of illicit discharge detection, outfalls, ponds and structural pollution control devices, a reporting method for employee training events and pond testing procedures and schedules within 12 months of the date permit coverage is extended to the City.

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

Phil Olson, City Engineer

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

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

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

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

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? Yes No
- If **no**, this section requires no further information.
 - If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

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

VIII. Add any Additional Comments to Describe Your Program