



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 Arden Hills *County: Ramsey
(city, county, municipality, government agency or other entity)
*Mailing address: 1245 West Highway 96
*City: Arden Hills *State: MN *Zip code: 55112-5743
*Phone (including area code): 651-792-7800 *E-mail: janderson@cityofardenhills.org

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

*Last name: Anderson *First name: John
(department head, MS4 coordinator, consultant, etc.)
*Title: Assistant City Engineer
*Mailing address: 1245 West Highway 96
*City: Arden Hills *State: MN *Zip code: 55112-5743
*Phone (including area code): 651-792-7846 *E-mail: janderson@cityofardenhills.org

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

Last name: Anderson First name: John
(department head, MS4 coordinator, consultant, etc.)
Title: Assistant City Engineer
Mailing address: 1245 West Highway 96
City: Arden Hills State: MN Zip code: 55112-5743
Phone (including area code): 651-792-7846 E-mail: janderson@cityofardenhills.org

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: John M. Anderson
(This document has been electronically signed)

Title: Assistant City Engineer Date (mm/dd/yyyy): 10/30/13 (revised 12/04/13)

Mailing address: 1245 West Highway 96

City: Arden Hills State: MN Zip code: 55112-5743

Phone (including area code): 651-792-7846 E-mail: janderson@cityofardenhills.org

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
Rice Creek Watershed District	MCM 1 Public Education
Ramsey County Conservation District	MCM 4 Construction site inspections

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

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

Illicit discharges

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

1. If **yes**:

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

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

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

Citation:

Direct link:

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

2. If **no**:

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

Construction site stormwater runoff control

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

1. If **yes**:

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

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

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

Citation:

Direct link:

- 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:

review existing ordinance within 6 months, revise to make ordinance as stringent as the MPCA general permit and obtain City Council approval within 12 months

- 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 type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 5. BMP maintenance | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input type="checkbox"/> Yes | <input checked="" 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 type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins. | <input type="checkbox"/> Yes | <input checked="" 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:

review existing ordinance within 6 months, revise ordinance to match requirements described in permit (Part III.D.4.a.(1)-(8)) and obtain City Council approval within 12 months

Post-construction stormwater management

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

1. If **yes**:

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

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

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

Citation:

Direct link:

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:

review existing policies and ordinances within 6 months, revise to regulate post construction stormwater management by ordinance and obtain City Council approval within 12 months

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:

review existing policies and ordinances within 6 months, revise and obtain City Council approval within 12 months

B. Describe your ERPs:

We currently issue grading and erosion control permits to construction projects. During construction we contract with Ramsey County Conservation District to inspect the erosion and sediment control on site. If compliance becomes a problem and the inspector is not able to gain compliance the Assistant City Engineer becomes involved in employing the various tools available to gain compliance including, stop work orders and drawing on escrows to complete work ,denial of certificate of occupancy, etc.

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

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

Historically the City has maintained a schematic map showing storm conveyance and BMP location. During 2013 We have undertaken an initiative to provide much more detail in this mapping. We collected accurate locations on all storm sewer inlets and manholes and identified additional outfalls not previously mapped. All this data is mapped in Arcview and contains attributes to describe the system.

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. [X] Yes [] 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:

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:

within the next 12 months we will identify all pond data as required by Part IV, C and D and add it to our Arcview data

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**:

The current education program main focus is related to topics of concern to residential property and residential storm discharge. The basic messages are related to the fact that there is no "treatment plant" that storm water goes to and what you put on the ground and in the street will end up in the lakes and rivers.

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
Educational materials	Number of articles published annually
Annual public meeting	Hold meeting
Rain Garden Planting	Hold event
BMP categories to be implemented	Measurable goals and timeframes
Revise the education and outreach program to include specifically selected stormwater related issue	Annually identify specific issue to include in the current year's education and outreach program
Revise the education and outreach program to include illicit discharge recognition and reporting	Revised program within 12 months of permit coverage extension
Review education and outreach priorities and modify the program as needed	Review complete, modifications implemented, annually
Documentation of specifically selected stormwater related issue, implementation plans, annual review findings, activities held and materials distributed to address MCM1	Complete written documentation annually

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

John Anderson, Assistant 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:

Our current public participation and involvement is centered around the annual public meeting. This meeting is noticed as required and held during a regularly scheduled City Council meeting. This meeting is broadcast on the city cable channel and is available for future viewing on on the internet on demand as well as being repeated on the cable channel

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
Annual Meeting	Hold annual meeting, each year
Advertise annual meeting	Publish advertisement, every year

Rain garden planting	Hold event with pavement management project, when there is a pavement management project with rain garden construction
BMP categories to be implemented	Measurable goals and timeframes
Document citizen input as it is received	Completed journal of input each year

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:

John Anderson, Assistant 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:

Our current program for illicit discharge detection relies on three main sources of detection to identify problem areas. the first line of defence comes from our citizens who can see the largest portion of our city and are not afraid to contact the city if they see a problem. The second is our employees who are traveling throughout the city daily and see much of our storm water infrastructure each day. the third line of defence is rooted in our outfall and waterbody inspections which cover a portion of the city annually.

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:

within 6 months identify procedures to implement to satisfy items 2.e,f,g, and h above. Within 12 months draft ordinances

and receive City council approval to provide the legal basis needed to use ERP's to eliminate illicit discharge and require any needed corrective action(s).

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
Storm sewer map	Complete mapping revisions annually
Regulatory Control Program	Implementation of ordinance and review each year
Illicit Discharge Detection and Elimination Plan	Number located annually
Public and employee illicit discharge information program	Number of signs / stencils installed annually
Identification of Non Stormwater Discharges	Number of illicit discharges located each year
BMP categories to be implemented	Measurable goals and timeframes
Review procedures related record keeping and identify modifications to existing practices	Complete review, within 6 month of the date coverage is extended
Implement modifications to record keeping	Include results documented with record keeping reports in the second and subsequent years annual meeting
Develop procedures for response to reported illicit discharges and eliminating the source of discharges	Completed written procedures ,Within 6 month of permit coverage extension
Develop procedures for responding to spills	Completed written procedures ,Within 6 month of permit coverage extension
Develop ERP for response to eliminate illicit discharges and eliminating the source of discharges	Completed written procedures, Within 6 month of permit coverage extension. Within 12 month, modify existing ordinance as need ed to provide authority to implement ERP
Complete a pond inventory per 2009 legislative mandate	Pond inventory completed within 12 months of permit coverage extension
Annual outfall inspections to include observations of potential illicit discharge	20% of outfalls inspected annually or at least once in the permit term
Pond inspections to include observations of potential illicit discharge	20% of ponds inspected annually or at least once in the permit term
Training of all field staff in illicit discharge recognition	Conduct annual training
Complete identification of priory areas for illicit discharge	Map area of priority completed in second year of the permit
Develop procedures for investigating, locating and eliminating illicit discharges	Procedures developed in the third year of the permit
Documentation of specific information related to this minimum control measure	Identify a process to keep records, incorporate the process into the standard procedures and complete documentation annually

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? Yes No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

within 6 months identify a process to keep records that complies with the permit (Part III.D3.h), incoroprate the process to standard procedures within 12 months.

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

John Anderson, Assistant City Engineer

D. MCM 4: Construction site stormwater runoff control

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

The City of Arden Hills currently requires grading and erosion control plans for all projects that move more than 50 cubic yards or disturb more than 5,000 square feet. The plan submitted is reviewed for compliance with the applications of BMPs required, as part of the review we ask for copies of the NPDES construction permit and Rice Creek Watershed District permit, if one applies.

- Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
 - Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? Yes No
 - 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
 - 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
 - Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - Does your program include procedures for identifying priority sites for inspection? Yes No
 - Does your program identify a frequency at which you will conduct construction site inspections? Yes No
 - Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? Yes No
 - Does your program include a checklist or other written means to document construction site inspections when determining compliance? Yes No
 - Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? Yes No
 - Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? Yes No
 - 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.

within 6 month collect the current practice in construction site runoff control in writing. Within 12 months compare the current practice with the requirements of the permit (Part III.D.4.b) and make modifications as necessary and document the revised process in writing.

- 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
Regulatory Mechanism	Review ordinance annually, revise ordinance to meet requirement in Part III.D.4.a.(1) and (2) within one year
Construction Site Implementation of Erosion and Sediment Control BMPs	Number of plans reviewed annually
Waste Controls for Construction Site Operators	Number of sites reviewed annually
Procedures for Site Plan Review	Number of plans reviewed annually
Establishment of Procedures for the receipt and consideration of reports of stormwater non compliance	Distribute information
Establishment of procedures for site inspections and enforcement	Number of permits issued annually
BMP categories to be implemented	Measurable goals and timeframes

Establish written procedures for site plan reviews, reports of non compliance, site inspections	Collect data on current practices within 6 months. Complete written procedures within 12 months of permit coverage extension
Develop a written documentation process to retain records on permit applications	Collect data on current practices within 6 months. Complete written procedures within 12 months of permit coverage extension
Evaluate the procedures as documented and make adjustments as needed	After the procedure has been in place for two years complete the evaluation within 6 months and have modifications in place within 12 months

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

John Anderson, Assistant City Engineer

E. MCM 5: Post-construction stormwater management

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

Our current practice requires that projects prove they have received permit approval for the NPDES construction site permit as well as the Rice Creek Watershed District. Additionally we require that the completed project be documented in a grading as built survey. a Certificate of Occupancy will not be issued until permit requirements have been completed

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.

Within 6 months we will assess the changes needed in our program to meet the permit requirements (Part III.D.5.c.). Our current program has no contingency for mitigation and this is where the bulk of the changes will need to take place. Within 12 months, complete a revised program meeting the permit and document in writing the new process including obtaining City Council approval on changes to ordinances needed to provide the legal basis to implement the program.

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
Development and Implementation of Structural and Non Structural BMPS	Number of detention and retention BMPS installed each year
Regulatory Mechanism to address post construction runoff from new development and redevelopment	Review annually
Long term operation and maintenance of BMPs	Review annually

BMP categories to be implemented	Measurable goals and timeframes
Establish written procedures for site plan reviews which include submittal data requirements, documentations related to mitigation, accounting of mitigation credits and the legal mechanism used for mitigation sites	Complete written procedures within 12 months of permit coverage extension and obtain city council approval of the necessary changes to city ordinances to provide for the implementation of the site plan review.

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

John Anderson, Assistant 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:

Our current pollution prevention and good housekeeping program focuses mainly on the programs that can have the largest citywide results. We sweep all city streets twice a year, once in the spring and once in the fall. We have undertaken a large effort in the last two years to understand our system by inspecting roughly 75% of the outfalls, 100% of the structural pollution control devices and all of our rain gardens.

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:

over the next 6 months we will be identifying facilities to include in the inventory, assembling data. Within 12 months we will complete a facility inventory as outlined in the permit (Part III.D.6.a)

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
Municipal Operations and Maintenance Program	Length of pipe cleaned annually
Street Sweeping	Program and procedures exist
Annual Inspection of all structural pollution control devices	Number inspected annually
Annual inspection of outfalls and ponds	Number inspected annually
Annual Inspection of all exposed stockpile, storage and material handling areas	Inspection completed each quarter

BMP categories to be implemented	Measurable goals and timeframes
Identify facilities to include in the inventory	Complete inventory, within 12 months of permit extension
Develop a seasonal position for the purpose of maintaining stormwater facilities such as rain gardens, grit chambers, etc.	Add the position to the operating budget, staff the position with city council approval
Collaborate with Ramsey County Public works on operations at the Public Works Garage with is owned and operated Ramsey County Public Works	Hold quarterly meeting between Ramsey County and City public works employees to coordinate city staff's role in the implementation of Ramsey County's NPDES – MS4 Plan

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? Yes No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? Yes No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? Yes No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? Yes No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? Yes No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? Yes No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? Yes No
- b. Covers the requirements of the permit relevant to the duties of the employee? Yes No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? Yes No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? Yes No

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

Develop BMPs targeting protection of surface water source intakes within 6 months, develop and implement those BMPs within 12 months

Develop and implement procedures for determining the TSS and TP treatment effectiveness within 12 months

develop and implement training programs that include topics such as protecting water quality, duties of the employee. The program will need to establish a schedule for different employee classes such as new hire, seasonal, existing employee. This program will be in place within 12 months

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

John Anderson, Assistant 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
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