

Public Education and Outreach on Storm Water Impacts

UPDATED FOR 2021 MSA PERMIT

General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)  
Measurable Goals

MCM1 Public Education and Outreach on Storm Water Impacts

Target		Audience(s)	Desired Result	Measurable Goal	Milestone Date	Associated BMPs	Measure of Success (Effectiveness)
Pollutant(s)							
1	Nitrogen and Phosphorus	Residents and Businesses	3.2.1.2 Identify target sources for the most likely potential to be contributors of nitrogen and phosphorous	Create a list of properties, both residential and commercial, that meet the requirement	1-Sep-16	PEP and UM	Information is current on website and included in utility bills or city newsletter annually.
2	Nitrogen and Phosphorus	Residents and Businesses	3.2.1.3 To educate targeted sources about the impacts of nitrogen and phosphorus in the storm water system	Include information on the website and utility bills regarding nitrogen and phosphorus	Annually	PEP and UM	Information is current on website and included in utility bills or city newsletter annually.
3	Total Dissolved Solids (TDS) and Total Phosphorus (TP)	Residents and Businesses	4.2.1.1 To educate audiences about impacts from storm water discharge	Investigate supporting SLCo TV ads	1-Sep-11	PEP and UM	Review investigation report
4	Total Dissolved Solids (TDS) and Total Phosphorus (TP)	Residents (4th graders)	4.2.1.1.1 To educate audiences on ways to avoid, minimize, and reduce impacts of storm water discharge	Continue booth at the annual Utah County Fair and educational program for fourth graders.	Annually	PEP and CESW	Renew contract with 4th grade presenter and continue Fair booth annually
5	Total Dissolved Solids (TDS) and Total Phosphorus (TP)	Residents and Businesses	4.2.1.1 To educate audiences on actions individuals can take to improve water quality	Investigate supporting SLCo TV ads	1-Sep-11	PEP and UM	Review investigation report
6	See list in "desired result" column	General Public	4.2.1.2 Information is provided to target audience on prohibitions against illicit discharges and improper disposal of waste including: maintenance of septic systems; effects of outdoor activities, such as lawn care; benefits of on-site infiltration of storm water; effects of automotive work and car washing on water quality; proper disposal of swimming pool water; and proper management of pet wastes.	Include information on the website and include information in utility bills or city newsletter at least once annually.	Annually	PEP and UM	Information is current on website and included in utility bills or city newsletter annually.
7	See list in "desired result" column	Institutions, industrial, commercial facilities	4.2.1.3 Document information given to institutions, industrial, and commercial facilities. Must at a minimum cover lawn maintenance, benefits of onsite infiltration of stormwater, building & equipment maintenance, use of salt and other deicing materials, storage of materials, waste management, and parking lot sweeping. Can combine with 4.2.3	Include information on the website and include information in utility bills or city newsletter at least once annually.	Annually	PEP and UM	Information is current on website and included in utility bills or city newsletter annually.
8	See list in "desired result" column	Business and Institutions		Include information on the website and include information in utility bills or city newsletter at least once annually.	Annually	PEP and UM	Information is current on website and included in utility bills or city newsletter annually.
9	Illicit discharge and waste	Contractors, Developers, and plan review staff	4.2.1.4 Reduce adverse impacts from development sites	Assemble packets of information on SWPPP and BMPs	1-Jul-11	EM	The packet will be in the SWMP and on the Website.
10	Illicit discharge and waste	Employees	4.2.1.5 Information is provided to target audience on prohibitions against illicit discharges and improper disposal of waste including: Equipment inspection to ensure timely maintenance Benefits of appropriate on-site infiltration of storm water Minimization of use of salt or other deicing materials Proper storage of industrial materials Proper management of waste materials and dumpsters Proper management of parking lot surfaces.	Have training twice a year in group employee meetings	Semi-annually	ET	Training occurs semi-annually

MCM1 Public Education and Outreach on Storm Water Impacts						
Pollutant(s)	Audience(s)	Desired Result	Measurable Goal	Milestone Date	Associated BMPs	Measure of Success (Effectiveness)
11 All pollutants	Permittee engineers, development and plan review staff, land use planners	4.2.1.6 Training on LID, Green infrastructure, and post construction BMPs	Hold DRC meeting and learn about Low Impact Development (LID) practices, green infrastructure practices, and to communicate the specific requirements for post-construction control and the associated Best Management Practices (BMPs) chosen within the SWMP.	Annually		Annual meeting occurs
12 All pollutants	All Audiences	4.2.1.7 Evaluate the effectiveness of the public education program by a defined method.	Research public education evaluation methods and select the best one	1-Jan-11		Documented in annual report, number of citizen reported stormwater violations
13	"	"	Create a spreadsheet for tracking Illicit Discharges	1-Jan-12		Implement the selected method
14 All pollutants	All Audiences	4.2.1.8 Document why certain BMPs were chosen for public education program (over others)	Include an explanation in the SWMP on why the public education BMPs were chosen...	1-Dec-10		Documented rationale included in the SWMP.

Public Involvement/Participation

General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)		UPDATED FOR 2021 MS4 PERMIT						
MCM 2 Public Involvement/Participation		Target Audience(s)		Desired Result	Measurable Goal	Milestone Date	Associated BMPs	Measure of Success (Effectiveness)
1	All pollutants	General public		4.2.2 SWMP shall include ongoing opportunities for public involvement at least two times annually...	Allow public to comment on SWMP at least twice annually	Annually	PEP	SWMP is posted online at all times. Twice annually this will be mentioned in newsletter articles to direct the public to review and comment
2	All pollutants	General public		4.2.2.1 Have a program or policy in place that allows for the public to provide input	Notice the public of the city council meeting when the SWMP update will be reviewed according to City noticing process and accept comment at the meeting.	01-Dec-10	PEP	Program was noticed for City Council meeting on Nov.16, 2011 and adopted
3	All pollutants	General public		4.2.2.2 Have SWMP document available for public review before it's submitted to the state	Have a hard copy of the draft of the permit available at the city offices before the public hearing	12-Nov-10	PEP	SWMP document is available for public review before public hearing
4	All pollutants	General public		4.2.2.3 Have SWMP document available to the public at all times	Post the SWMP on the website within a month from date submitted to State	15-Feb-11	PEP	SWMP is updated and posted on the website
5	All pollutants	General public		4.2.2.3 Make updated SWMP document available to the public annually	Post updated SWMP annually on website	Annually	PEP	SWMP is updated and posted on the website annually
6	All pollutants	General public		4.2.2.3 Clearly denote a specific contact person and phone number or email address to allow the public to review and provide input for the life of the permit	Post contact information for SWMP contact online	01-Sep-16	PEP	SWMP Contact is posted online

Illicit Discharge Detection and Elimination (IDDE)

UPDATED FOR 2021 MS4 PERMIT						
General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)						
Measurable Goals						
MCM 3 Illicit Discharge Detection and Elimination Target						
Pollutant(s)	Audience(s)	Desired Result	Measurable Goal	Milestone Date	Associated BMPs	Measure of Success (Effectiveness)
1 All Pollutants	Contractors, Developers, City Council	4.2.3 Enforcement ability for storm water rules	Review existing ordinance to conform with IDDE requirement in permit and draft changes to be approved. Change dirt ramp section, no gravel ramps	1-Sep-16	OD	Ordinance meets the permit requirements
2 *	*	*	Update the ordinance to conform with IDDE requirement in permit	Feb-12	OD	Ordinance is in place and meets the permit requirements
3 N/A	Public Works	4.2.3.1. Maintain a current storm sewer system map of the MS4, with locations of outfalls (names and location of all State waters that receive discharges), storm drain pipe and other storm water conveyance structures within the MS4.	Establish policy to maintain a Current SD System Map on all new developments	1-Jul-11	MSWD	Policy is in place and meets the permit requirements
4 *	*	*	Implementing policy and bring map current with all new accepted developments	1-Jul-12	MSWD	90% are input within 12 months
5 *	*	*	Implementing policy and have all map updates done within 6 months of final acceptance	Semi-Annually	MSWD	90% are input within 6 months
6 All Pollutants	All Audiences	4.2.3.2 Effectively prohibit, through ordinance... non-storm water discharges to the MS4...	Adopt ordinance that prohibits all non-storm water discharges.	1-Jul-11	OD	Ordinance meets the permit requirements
7 All Pollutants	All Audiences	4.2.3.2 IDDE program must have legal authority to detect, investigate, eliminate, and enforce against non-storm water discharges...	Adopt ordinance that prohibits all non-storm water discharges.	1-Jul-11	OD	Ordinance meets the permit requirements
8 All Pollutants	All Audiences	4.2.3.3.1 Develop and implement written systematic procedures for locating and listing the following priority areas likely to have illicit discharges	Develop written process for identifying priority area.	Annually	NSWD	Plan is in place
9 All Pollutants	All Audiences	4.2.3.3.2 Field assessment activities for the purpose of verifying outfall locations and detecting illicit discharges, including dry weather screening of outfalls or facilities serving priority areas identified in Part 4.2.3.3.1 as well as routine dry weather screening of all outfalls that discharge within the Permittee's jurisdiction to a receiving water.	Inspect all priority areas each year	Annually	NSWD	All priority areas are inspected
10 *	*	*	Do Dry weather screening once every 5 years for non-priority areas	Once every 5 years	NSWD	Inspections occur, with appropriate documentation, once every 5 years
11 All Pollutants	All Audiences	4.2.3.3.4 If the Permittee discovers or suspects that a discharger may need a separate UPDES Permit (e.g., Industrial Storm Water Permit, Dewatering Permit), the Permittee shall notify the Division	Check all current projects with NOI's to make sure they are current, check w/ building department for new business licenses to evaluate if a permit is needed.	Annually	NSWD	All NOI's are checked to be current or terminated, business licenses are checked
12 All Pollutants	All Audiences	4.2.3.4. Develop and implement standard operating procedures (SOPs) or similar type of documents for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, using field tests of selected chemical parameters as indicators of discharge sources, collecting and analyzing water samples for the purpose of determining sanctions or penalties, and/or other detailed inspection procedures.	Review and implement Dry Weather Screening Checklist/SOP. Utilize visual monitoring form.	1-Jul-11	IIC	Completed by milestone date
13 All Pollutants	All Audiences	4.2.3.5 Develop and implement SOP for characterizing the nature of any illicit discharges found or reported to the Permittee by the hotline developed in 4.2.3.9	Create the Incidence Response Flow Chart, IDDE Phone Call Report and IDDE Inspection Report. Train Personnel	1-Jul-11	IIC, CH	Completed by milestone date and staff is following process
14 *	*	*	Review flow chart (SOP) and Inspection Report with staff annually.	Annually	IIC, CH	Training is completed annually for all staff involved in incident reporting.
15 All Pollutants	All Audiences	4.2.3.6 Develop and implement standard operating procedures for ceasing the illicit discharge	Create the Incidence Response Flow Chart, Spill Report Form and IDDE Inspection Report. Train Personnel	1-Jul-11	IDC, ISDC	Completed by milestone date and staff is following process
16 All Pollutants	Public Employees, Businesses and Residents	4.2.3.7 Inform public employees, businesses, and general public of hazards associated with illicit discharges and improper disposal of waste	Will meet goal with MCM1 -Lines 5 & 7	Annually	PEP, ET	See MCM 1 -5 & 7
17 Household Hazardous Waste	Residents	4.2.3.8 Promote or provide services for the collection of household hazardous waste	Put the Household Hazardous Waste address and phone number on City Web Site	1-Jul-11	UOR, HWM	Completed by milestone date
18 Household Hazardous Waste	Residents	4.2.3.9. Permittees shall keep written record of all calls received, all follow-up actions taken, and any feedback received from public education efforts.	Create a spreadsheet for tracking IDDE calls	1-Jul-11	CH	Completed by milestone date
19 All Pollutants	Public Employees	4.2.3.9.1 Permittees must develop an SOP for spill responses	Create a spill response flow chart	1-Jul-11	CH	Completed by milestone date

MCM 3 Illicit Discharge and Elimination Target		Desired Result	Measurable Goal	Milestone Date	Associated BMPs	Measure of Success (Effectiveness)
Pollutant(s)	Audience(s)					
20 All Pollutants	All Audiences	4.2.3.10 Adopt and implement procedures for program evaluation and assessment. Include a database for mapping, tracking of the spills or illicit discharges identified and inspections conducted	Create a spreadsheet for tracking illicit Discharges	1-Jul-11	IIC, MSWD	Completed by milestone date
21 All Pollutants	Public Employees	4.2.3.11 Permittees shall at a minimum, ensure that all staff...receives annual training in the IDDE program including identification, investigation, termination, cleanup, and reporting of illicit discharges including spills, improper disposal, and illicit connections. All Permittees shall ensure that all new hires are trained within 60 days upon hire and annually thereafter, at a minimum. Follow-up training shall be provided as needed to address changes in procedures, methods or staffing.	Train all staff within 60 days upon hire and annually thereafter. Create a "new hire" educational pamphlet the covers the requirements of 4.2.3.11	9/1/2021 & Annually	PEP	Completed by milestone date & Annually thereafter
22 All Pollutants	Public Employees	4.2.3.11 The Permittee shall provide training to all field staff that as part of their normal job responsibilities might come into contact with or otherwise observe an illicit discharge or illicit connection to the MS4.	*	9/1/2016 & Annually	PEP	Completed by milestone date & Annually thereafter
23 All Pollutants	Public Employees	4.2.3.11 The Permittee shall also train office personnel who might receive initial reports of illicit discharges.	*	9/1/2016 & Annually	PEP	Completed by milestone date & Annually thereafter
24 All Pollutants	Public Employees	4.2.3.11 Training shall include how to identify a spill, an improper disposal, or an illicit connection to the MS4 and proper procedures for reporting the illicit discharge. Training records must be kept and shall include dates, activities or course descriptions, and names and positions of staff in attendance. The Permittee shall include a summary of such training in the annual report.	*	9/1/2016 & Annually	PEP	Completed by milestone date & Annually thereafter



Construction Site Storm Water Runoff Control

General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)							UPDATED FOR 2021 MS4 PERMIT	
MCM 4 Construction Site Storm Water Runoff Control								
Pollutant(s)	Target	Audience(s)	Desired Result	Measurable Goal	Milestone Date	Assoc. BMP	Measure of Success (Effectiveness)	
1 Sediment, Construction Site Debris, Hydrocarbons	Contractors, Developers, MS4 staff and City Attorney		4.2.4.1. Develop and adopt ordinance or other regulatory mechanism that requires use of erosion and sediment control practices at construction sites, construction operators to prepare a Storm Water Pollution Prevention Plan (SWPPP) for sites greater than 1 acre or part of a Common Plan of Development, provision for access by qualified personnel to inspect construction storm water BMPs on private properties that discharge to the MS4 and defines an escalating enforcement strategy.	Review existing ordinance to meet requirement in Part 4.2.4.1	Jul-11	OD	When review is completed and list of changes have been documented.	
2 Sediment, Construction Site Debris, Hydrocarbons	Contractors, Developers, MS4 staff and City Attorney			Draft changes to ordinance to meet requirement in Part 4.2.4.1	Feb-11	OD	Completed by milestone date	
3	Contractors, Developers, MS4 staff, City Attorney & City Council			Submit ordinance changes to City Council for approval.	Feb-12	OD	Completed by milestone date	
4 All Pollutants	Construction Operators		4.2.4.1.2 Permittees shall ensure construction operators obtain and maintain coverage under the current UPDES Storm Water General Permits for Construction Activities for the duration of the project.	Ensure NOI coverage for all applicable construction projects	Annually	OD	The NOI is a checklist item on the LDP. All applicable construction jobs that meet the NOI requirements are covered under an active NOI Permit	
5 All Pollutants	Construction Operators		4.2.4.1.3 Ordinance to include provision for access and inspections...	Review existing ordinance to meet requirement in Part 4.2.4.1.3	Jul-21	OD	When review is completed and list of changes have been documented.	
6 All Pollutants	Construction Operators		4.2.4.2 Develop a written enforcement strategy and implement the enforcement provisions of the ordinance or other regulatory mechanism which shall include: (4.2.4.2.1) Standard Operating Procedures (SOPs) or similar type of documents that include specific processes and sanctions to minimize the occurrence of, and obtain compliance from violators which shall include appropriate, escalating enforcement procedures and actions.	Create a SOP which details the escalating enforcement actions which the city will follow when violations occur. Update the LDP to include enforcement actions	Sep-16	OD	The SOP for enforcement is completed and LDP is updated	
7			4.2.4.2.2 Documentation and tracking of all enforcement actions	Develop and begin using a construction site enforcement action log/database - red tags, fines	Feb-12	OD	We have a log and are using it	
8 Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers		4.2.4.3. Develop and implement SOPs or similar type of documents for pre-construction Storm Water Pollution Prevention Plan (SWPPP) review and keep records for, at a minimum, all construction sites that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale	Develop checklist and begin to do preconstruction reviews of SWPPP	Feb-12	ECP	We are conducting SWPPP reviews	
9 All Pollutants	Construction Operators		4.2.4.3.1 Conduct a pre-construction SWPPP meeting..	Document pre-construction meetings	Sep-21	ECP	Pre-construction SWPPP meetings take place	
10			4.2.4.3.2 Incorporate into the SWPPP review procedures the consideration of potential water quality impacts and procedures for pre-construction review which shall include the use of a checklist.	Create a SOP for SWPPP reviews which includes water quality impacts as an item to be considered	Feb-12	ZO	The SWPPP pre-con SOP covers this	
11			4.2.4.3.3 Identify priority construction sites considering the following factors at a minimum; soil erosion potential, site slope, project size and type, sensitivity of receiving water bodies, proximity to receiving waterbodies, non-storm water discharges and past record of non-compliance by the operators of the construction site.	Develop a "sensitive area" map showing areas within the city where "additional" protection may be desired AND create a checklist item to review during pre-construction meetings that will help determine if a site is High Priority	Sep-16	LIP	Sensitive Areas Map and Checklist created	
12 All Pollutants	MS4 Staff		4.2.4.4 Develop SOP's for construction site inspections..	Develop written SOP for construction site inspection	Sep-21		SOP is created for construction site inspections	
13 Sediment, Construction Site Debris, Hydrocarbons	Contractors and Developers		4.2.4.4.1 Inspections of all new construction sites ... at least monthly by qualified personnel	Conduct monthly inspections of all construction sites	Annually	CCIT	All active construction sites inspected monthly	
14	Contractors, developers and MS4 staff		4.2.4.4.2 ...The Permittee must include in its SWMP document a procedure for being notified by construction operators/owners of their completion of active construction so that verification of final stabilization and removal of all temporary control measures may be conducted.	Develop a written Notice of Termination process for use within the city	Feb-12	ECP	Completed by milestone date	
15 Contractors, developers and MS4 staff				Train SWPPP inspectors, their supervisors, and any personnel who grant final occupancy permits on the NOT process	Feb-12	ECP	Completed by milestone date	
16			4.2.4.4.3 Conduct Bi-weekly inspections on high priority construction sites	Inspect high priority sites Bi-weekly	Annually	ECP	High priority sites are inspected by-weekly	

MCM 4 Construction Storm Water Runoff Control		Target Audience(s)		Desired Result		Measurable Goal	Milestone Date	Assoc. BMP	Measure of Success (Effectiveness)
Pollutant(s)	Target								
17	"	"	"	4.2.4.4.3 Inspections by the MS4 of priority construction sites defined in Part 7.0 must be conducted at least by-weekly (every two weeks) use the Construction Storm Water Checklist found on the Division's website		Note on pre-con SOP that if designated High Priority, the site will be inspected by-weekly	Sep-16	LIP	Alter SWPPP pre-con notes to mention High Priority inspection frequency
18	Sediment, Construction Site Debris, Hydrocarbons	Contractors, developers and MS4 staff		4.2.4.5 Permittee must ensure that all staff whose primary job duties are related to implementing the construction storm water program, including permitting, plan review, construction site inspections, and enforcement, are annually trained to conduct these activities. ....		Annual training all all new hires and existing employees in the areas mentioned	Annually	LIP	Annual training of all applicable staff takes place and is documented
19	Sediment, Construction Site Debris, Hydrocarbons	Contractors, developers and MS4 staff		4.2.4.5 Permittee must.. Ensure that all new hires are trained within 60 days of hire date and annually thereafter..		Train new hires within 60 days and annual training thereafter	Annually	LIP	Train new hires within 60 days and annual training thereafter. Document training dates
20	"	"	"	4.2.4.6 Maintain a log of active construction sites		Establish an active construction sites log	Annually	ECP	Construction sites are recorded in the log and inspection reports kept on file

UPDATED FOR 2021 MS4 PERMIT

General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) Measurable Goals		Audience(s) Target		Desired Result	Measurable Goal	Milestone Date	Assoc. BMP	Measure of Success (Effectiveness)
<b>MCM 5 Long-Term SWM in New Development and Replacement (Post-Construction Storm Water Management)</b>								
1	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.1 The permittee's new development/redevelopment program must have requirements or standards to ensure that any storm water controls or management practices... will prevent or minimize impacts to water quality. BMP's must be selected that address pollutants known to be discharged or have potential to be discharged from the site.	Ensure LID Handbook meets requirements	Sep-21	OD	LID Handbook reflects requirement
2	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.1.1 ...program should include non-structural BMP's	Ensure LID Handbook meets requirements	Sep-21	OD	LID Handbook reflects requirement
3	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.1.2 Retention Requirement. 80th Percentile Retention Required	Create process to enforce 80th percentile retention requirement	Sep-21	OD	LID Handbook reflects requirement
4	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.1.3 LID approach is required	Ensure LID Handbook meets requirements	Sep-21	OD	LID Handbook reflects requirement
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.2 Regulatory Mechanism which requires long-term post storm water controls...	Create ordinance to meet the requirements	Sep-21	OD	Ordinance is created
		" "	" "	4.2.5.2.1 Ordinance must include enforcement provisions.	Create ordinance to meet the requirements	Sep-21	OD	Ordinance is created
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.2.2 Permittee must maintain documentation on how the requirements of the ordinance or other regulatory mechanism will protect water quality and reduce the discharge of pollutants to the MS4. Documentation shall include how long-term storm water BMP's were selected, the pollutant removal performance expected from the selected BMP's and the technical basis which supports the performance claims for the selected BMP's.				
		" "	" "	4.2.5.2.2 Permittee shall adopt and implement SOP's... for site inspection and enforcement of post-construction storm water control measures. ...	Create SOP's that meet the requirement	Sep-21	OD	SOP's are created
13	"	"	"	4.2.5.2.3 The ordinance or other regulatory mechanism shall include provisions for both construction-phase and post-construction access for Permittees to inspect storm water control measures on private properties that discharge to the MS4 to ensure that adequate maintenance is being performed.	Draft a maintenance agreement template	Sep-16	IM	Draft is completed by the milestone date
15	"	"	"	4.2.5.2.5 Inspections and any necessary maintenance must be conducted annually by either the Permittee or through a maintenance agreement, the property owner/operator. On sites where the property owner/operator is conducting maintenance, the Permittee shall inspect those storm water control measures at least once every five years, ...	Inventory post-construction BMPs - see 4.2.5.7.1 for inventory inclusion items	Dec-11	IM	Inventory is complete
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.3.1 Adopt and implement procedures for site plan review which evaluates potential water quality impacts.	Create SOP for site plan review to evaluate potential water quality impacts	Sep-21	LIP	SOP's are created
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.3.2 Review post-construction plans for ... long-term storm water management measures meet the requirements of this minimum control measure	Ensure LID Handbook meets requirements	Sep-21	LIP	LID Handbook reflects requirement
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.4 Permittee must maintain an inventory of all post-construction structural storm water control measures...	Survey and incorporate all storm water structures into City's GIS system	Ongoing	MSWS	GIS system is up-to-date with all installed storm water structures
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.1.1 Each entry to the inventory must have basic information	Document inventory inspections per the requirement	Ongoing	MSWS	Inventory lists have information required by 4.2.5.1.1
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.4.2 Permittee must update the inventory mentioned in 5.2.5.4.1 when changes occur	Update inventory when changes occur	Ongoing	MSWS	Inventory is kept up-to-date
	All Pollutants	MS4 Staff	MS4 Staff	4.2.5.5 Permittee must ensure that all staff involved in post-construction storm water management... are trained within 60 days upon hire and annually thereafter	Train staff per the requirement	Ongoing	LIP	Training records are kept up-to-date

Long-Term Storm Water Management in New Development and Redevelopment (Post-Construction Storm Water Management)

Pollution Prevention and Good Housekeeping for Municipal Operations

**UPDATED FOR 2021 MS4 PERMIT**

**General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)**  
**Measurable Goals**

**MCM 6 Pollution Prevention and Good Housekeeping for Municipal Operations**

Pollutant(s)	Audience(s)	Target	Desired Result	Measurable Goal	Milestone Date	Assoc. BMP	Measure of Success (Effectiveness)
1. All pollutants	MS4 staff		4.2.6 ...All components of an O & M program shall be included in the SWMP document and must identify the department (and where appropriate, the specific staff) responsible for performing each activity described in this section...	Complete Org chart and define specific responsibilities for all departments shown	Jan-11	HP	Org chart is complete and up to date by milestone date
2	"	"	4.2.6.1. Permittees shall develop and keep current a written inventory of Permittee-owned or operated facilities	Complete listing of MS4 owned/operated facilities	Dec-10	HP	List is completed by milestone date
3	"	"	4.2.6.2. & .3. All Permittees must initially assess the written inventory of Permittee-owned or operated facilities, operations and storm water controls identified in Part 4.2.6.1. for their potential to discharge to storm water the following typical urban pollutants:	Complete assessments and identify "high priority" facilities	Feb-11	HP	Assessments are completed and documentation recorded in SWMP
4	"	"	4.2.6.4. Each "high priority" facility identified in Part 4.2.6.3. must develop facility-specific standard operating procedures (SOPs) or similar type of documents.	Review, customize and update appropriate SOPs	Jul-11	HP	SOPs are updated and current by milestone date, SWPPP for shop
6	"	"	4.2.6.5.1 Monthly visual inspections: The Permittee must perform monthly visual inspections of "high priority" facilities in accordance with the developed SOPs to minimize the potential for pollutant discharge.	Develop monthly inspection form and log	Jul-11	HP	Completed inspection form and log
7	"	"	"	Conduct monthly inspections	Annually	HP	At annual review all monthly inspections are logged and reports completed
8	"	"	4.2.6.5.2 Semi-annual comprehensive inspections: At least twice per year, a comprehensive inspection of "high priority" facilities, including all storm water controls, must be performed	Develop semi-annual inspection form(s) and log	Jul-11	HP	Completed inspection form and log
9	"	"	"	Conduct semi-annual comprehensive inspections	Annually	HP	At annual review all semi-annual inspections are logged and reports completed
10	"	"	4.2.6.5.3 Annual visual observation of storm water discharges: At least once per year, the Permittee must visually observe the quality of the storm water discharges from the "high priority" facilities	Conduct annual visual observations of storm water discharges at high priority facilities	Annually	HP	At annual review all annual visual monitoring is completed and logged and reports completed
11	"	MS4 Staff, Contractors and Developers	4.2.6.6 & 4.2.6.6.1. The Permittee must develop and implement SOP's to protect water quality at each of the facilities owned or operated by the Permittee and/or activities conducted by the Permittee including, but not limited to: (see 4.2.6.6 for list)	Create SOP's for City owned facilities	Sep-21	IPL	SOP's are created
12	"	"	4.2.6.6.2 SOP's must include a schedule for... lot sweeping and storm drain system maintenance. ...	Include maintenance schedule in SOP's	Sep-21	IPL	SOP's meet minimum control measure requirement
			4.2.6.6.3 Permittees must ensure and document proper disposal methods of all waste water...	SOP's include methods of proper disposal of waste water	Sep-21	IPL	SOP's meet minimum control measure requirement
			4.2.6.6.4 Permittee must ensure that vehicle/equipment wash waters are not discharged to the MS4...	SOP's included appropriate washing methods and infrastructure is in place to meet this requirement	Sep-21	IPL	SOP's and infrastructure is in place to meet the requirement
			4.2.6.6.5 Permittee shall develop a spill prevention plan...	Spill prevention plan is created	Sep-21	IPL	Spill prevention plan is created
			4.2.6.6.6 All Permittees shall maintain an inventory of all floor drains...	Floor drain map created in GIS	Sep-21	IPL	Floor drain maps is up-to-date
			4.2.6.7 Permittee shall be responsible for ensuring... that contractors performing O&M activities for the Permittee are using appropriate storm water controls and following the SOPs, storm water control measures, and good housekeeping practices of the Permittee.	Follow up with contractors working for the city	on-going	IPL	Keep documentation if/when contractors work in area where this requirement would be required
			4.2.6.8 Permittee must develop and implement a process to assess the water quality impacts and the design of all new flood management structural controls that are associated with the Permittee or that discharge to the MS4. ...	Create SOP to meet the requirement	Sep-21	IPL	SOP is created that meets the requirement
			4.2.6.8.1 Existing flood management structural controls shall be assessed to determine whether changes or additions should be made to improve water quality. ...	Identify and perform site visits to flood management structural controls and assess as required	Sep-21	IPL	Document assessment of site visits
			4.2.6.9 Permittee must develop a plan to retrofit existing developed sites that the Permittee owns or operates that are adversely impacting water quality...	Identify any existing sites that may be adversely impacting water quality and make a plan for retrofit	on-going	IPL	All sites are visited and either deemed appropriate or identified as needing changes and plans are in place to make the change

MCM 6 Pollution Prevention and Good Housekeeping for Municipal Operations		Target	Audience(s)	Desired Result	Measurable Goal	Milestone Date	Assoc. BMP	Measure of Success (Effectiveness)
14	"	"	"	4.2.6.10 Permittee shall provide training for all employees who have primary construction, operation, or maintenance job functions that are likely to impact storm water quality. New employees are to be trained within 60 days of hire and annually thereafter.	See individual training goals within other MCMs	Annually	ET	Training goals are met