



City of Sugar Creek MS4
Stormwater Management Plan
MO-R040031 / 2021 - 2026
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Prepared by: TREKK Design Group, LLC



Contact Information (3.1.B):

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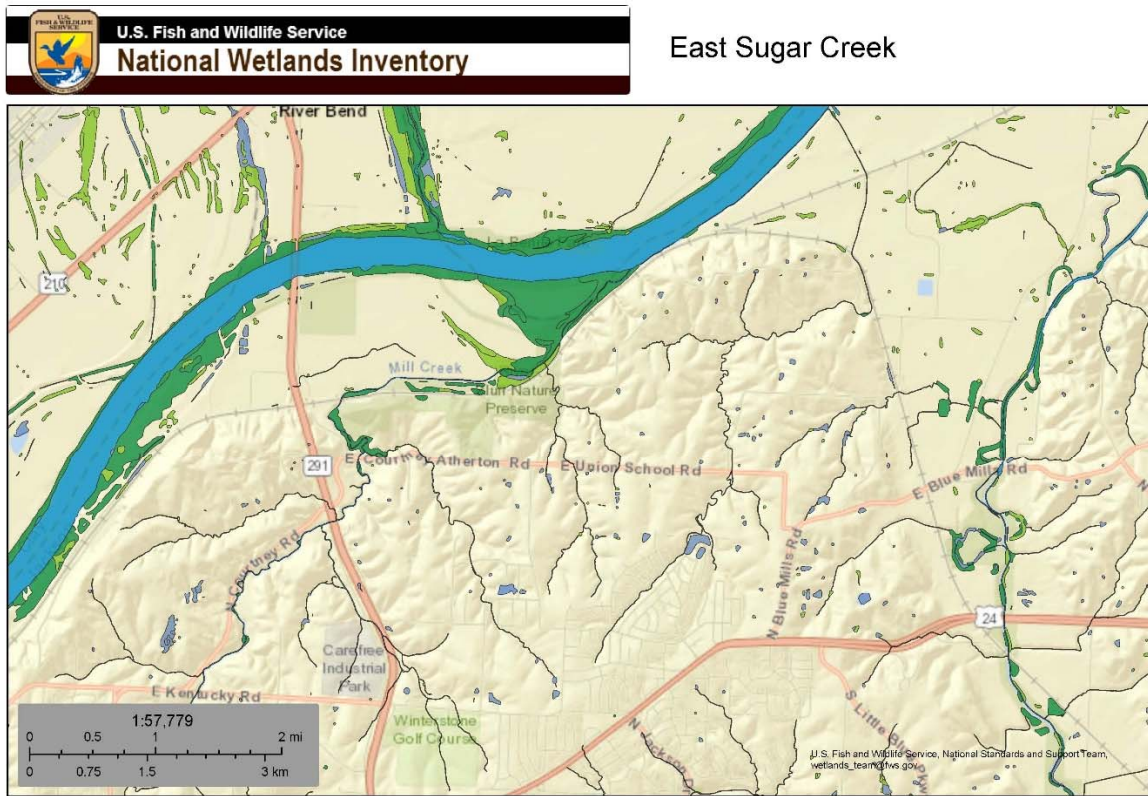
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Regulatory and Background Information:

The City of Sugar Creek (Permittee) is located south of the Missouri River in the Kansas City Metropolitan area, in Jackson County, with a small portion of the northern boundaries in Clay County. The current population is 3,209 according to the 2020 census. The major receiving waters within the permitted area include: Sugar Creek, Mill Creek, and the Missouri River. The Missouri River (Jackson County) and Mill Creek (Jackson County) are both on the 2020 CWA's list of impaired waters. For both, the pollutant getting them on the list is Escherichia coli, and there is not TMDL.

The Permittee is within 100 feet of streams and lakes and is not within 100 feet of waters classified as major reservoirs. Sugar Creek has some area defined as wetlands as identified by the National Wetland Inventory. Stormwater from Sugar Creek does not discharge to a sink hole. Figures 1 and 2 below show the identified wetland areas within the City of Sugar Creek.

Figure 1- East Sugar Creek Wetland Map



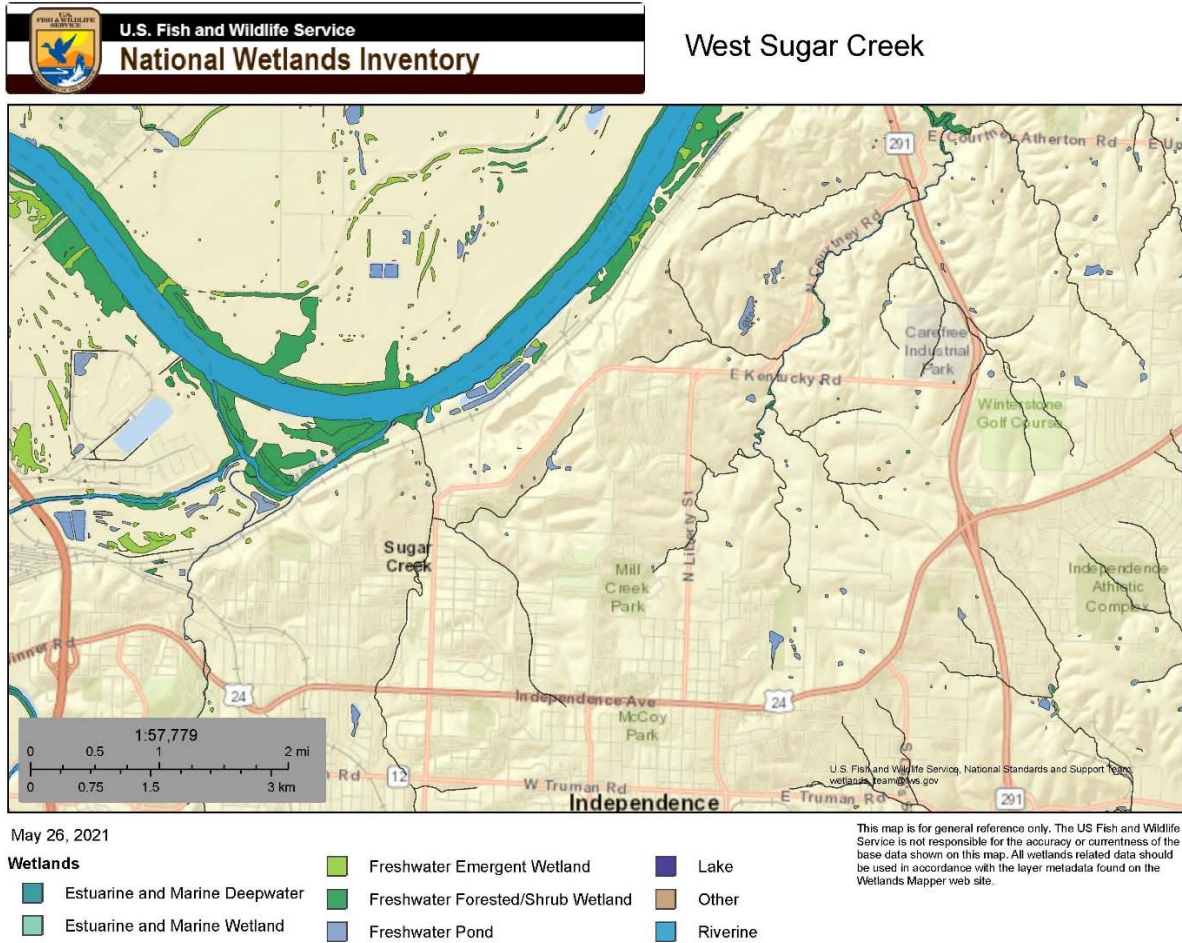
May 26, 2021

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
|  | Freshwater Pond |  | |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Figure 2 - West Sugar Creek Wetland Map



There are no historic properties in the area. There are threatened or endangered species in the area. The Permittee has met eligibility criteria for protection of threatened or endangered species, see information below. There are critical habitats in the area. The Permittee has met the eligibility criteria for protection of habitats, see information below.

County	Species	Status
Jackson	Gray Bat	Endangered
Jackson	Indiana Bat	Endangered
Jackson	Northern Long-eared Bat	Endangered
Jackson	Pallid Sturgeon Fish	Endangered
Jackson	Bald Eagle	Protected
Jackson	Black-billed Cuckoo	Protected
Jackson	Kentucky Warbler	Protected
Jackson	Prothonotary Warbler	Protected
Jackson	Red-headed Woodpecker	Protected
Jackson	Rusty Blackbird	Protected
Jackson	Wood Thrush	Protected

TMDL Information:

Not Applicable

Co-Permittee Information (3.2):

Not Applicable.

Stormwater Program Review and BMP Iterative Process (3.3):

The City evaluates the Stormwater Management Program and all BMPs in the SWMP annually for effectiveness and to identify areas for improvement. The information collected is included in the City's annual report.

In October 2018, the City of Sugar Creek, Missouri received a Letter of Warning as the result of a water pollution compliance audit and inspection on September 6, 2018. On November 27, 2018, the City sent a letter detailing the corrective actions for each violation in the Letter of Warning. See Appendix A for the Letter of Warning and corresponding response letter. This Stormwater Management Plan incorporates all of the corrective actions within the letter.

MCMs

4.1 MCM 1. Public Education and Outreach of Stormwater Impacts

The MS4 Operator shall implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. The public education and outreach program shall, at a minimum include the following:

4.1.A The MS4 Operator shall target specific audiences who are likely to have significant stormwater impacts.

The City of Sugar Creek identified the sources of stormwater pollutants that needed to be reduced to improve overall water quality. The target audiences were selected because changing their behavior would have a significant stormwater quality impact on the target pollutants. The target audiences for the public education program are:

1. Citizens
2. Business Owners
3. Developers and Contractors
4. Youth
5. Elected Officials
6. City Staff

4.1.B Identify target pollutants and/or sources of pollution that the permittee’s education program is designed to address and how those pollutants/sources relate to the specific target audience(s); and

Target Audience	Target Pollutant(s)
Citizens	Grass clippings, fertilizer & pesticides, litter, trash containment, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, wash water/grey water
Business Owners	Grass clippings, fertilizer & pesticides, litter, trash containment, illegal disposal of household hazardous waste, dumping of solid waste, failing septic systems, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste
Developers and Contractors	Grass clippings, fertilizer & pesticides, litter, trash containment, dumping of solid waste, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste,

	unauthorized discharge of industrial waste
Youth	Grass clippings, fertilizer & pesticides, litter, trash containment, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, wash water/grey water
Elected Officials	Grass clippings, fertilizer & pesticides, litter, trash containment, dumping of solid waste, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste, wash water/grey water
City Staff	Grass clippings, fertilizer & pesticides, litter, trash containment, dumping of solid waste, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste, wash water/grey water

4.1.C Develop or utilize appropriate educational resources to used as BMPs (materials, events, activities, etc.) in conjunction with the target pollutants and target audiences..

BMP	Target Pollutant	Target Audience	Permit Year
Information on the City's Website	Grass clippings, fertilizer & pesticides, litter, trash containment, dumping of solid waste, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste, wash water/grey water	Citizens, Business Owners, Developers and Contractors, Youth, Elected Officials, City Staff	Yearly
Maintain inlets with "No Dumping – Drains to Stream"	Grass clippings, litter, trash containment, dumping of solid waste, illegal disposal of household hazardous waste, pet waste, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage,	Citizens, Business Owners, Youth, Elected Officials, City Staff	Yearly

BMP	Target Pollutant	Target Audience	Permit Year
marking	sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste, wash water/grey water		
Publish articles in newsletter	Grass clippings, fertilizer & pesticides, litter, trash containment, dumping of solid waste, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste, wash water/grey water	Citizens, Business Owners, Developers and Contractors, Youth, Elected Officials, City Staff	Yearly
Fact sheets/ brochures/ utility bill insert	Grass clippings, fertilizer & pesticides, litter, trash containment, dumping of solid waste, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste, wash water/grey water	Citizens, Business Owners, Developers and Contractors, Youth, Elected Officials, City Staff	Yearly
Membership in Mid-American Regional Council (MARC)	Grass clippings, fertilizer & pesticides, litter, trash containment, dumping of solid waste, illegal disposal of household hazardous waste, pet waste, failing septic systems, swimming pool discharge, oil, grease, fluids from vehicles, power washing, vehicle washing, de-icing/rock salt usage/storage, sediment runoff from construction/land disturbance, unauthorized discharge of restaurant waste, unauthorized discharge of industrial waste, wash water/grey water	Elected Officials, City Staff	Yearly

4.1.D MS4 Operator must create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the Stormwater Management Program. The activities, (BMPs) must have an effort to impact stormwater runoff by improving water quality.

BMP	Measurable Goal	Adaptive Management	Permit Year	MS4 Operator Support
Information on the City's Website	The City has a stormwater page under departments / Public Works / Storm Water. This page will be up to date with stormwater management information and links to further data. This page will be updated yearly and will be maintained throughout the entire year	Any comments about the webpage information will be recorded	Yearly	MS4 Operator will track which articles seem to get the most attention
Maintain, or mark inlet with "No Dumping – Drains to Stream	The City has installed glued markings to all inlets that drain to streams	Markings will be checked and repaired if needed	Yearly	MS4 Operator will evaluate which inlets could benefit from markings
Publish articles in newsletter	A minimum of two articles annually will be published to address activities or pollutants of concern at seasonally appropriate time. Articles will be included in the City's Sweet Talk newsletter	Track and record any comments or responses to articles	Yearly	MS4 Operator will evaluate which articles get the most responses
Fact sheets/ brochures	Fact sheets or brochures will be available at City Hall. These will have information on various stormwater management topics. These will be updated yearly based on the target audience.	Track and record number of brochures taken each year	Yearly	MS4 Operator will evaluate the number of brochures taken with various stormwater topics
Membership in Mid-American Regional Council (MARC)	City will participate in the MARC Household Hazardous Waste collection program. City will review the water quality attitude	Participate in the MARC water quality public education programs and integrate them	Yearly	MS4 Operator will ensure participation and representation

	survey completed by MARC approximately every other year which provides “measurement” of changes in the metro area and determine how to integrate the results into their SWMP	into the City’s local SWMP.		and ensure that City receives some of the educational BMPs
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4.1.E MS4 Operator shall create or support the involvement in BMP(s) in Section 4.1.D.

BMP	Measurable Goals	Tracking & Adaptive Management
Stream or litter clean-up events	City will participate in or hold an annual stream or litter clean-up event annually. At least 2 miles of road will be cleaned up or 400 yards of stream or streambank or a combination of both	The distance and locations cleaned will be tracked and recorded. The amount of waste removed will be tracked by bag count
Street Sweeping Program	Street sweeping will be conducted at least twice a year	The distance and locations swept will be tracked and recorded.

4.1.F Using adaptive management, all MS4 Operators shall review their Public Education and Outreach on Stormwater Impacts Program, at minimum, annually and update implementation procedures and/or BMPs as necessary within the requirements of this permit. This may be conducted when preparing the annual MS4 Stormwater Management Program Report for submittal to the Department.

The City will review their Public Education and Outreach on Stormwater Impacts Program annually. The review will be documented in an excel spreadsheet with the date, the reviewer, and any changes that were made.

4.2 MCM 2. Public Involvement/Participation in Program Development

The permittee shall develop and implement a comprehensive public participation program that provides opportunities for public participation in the development and oversight of the permittee's Stormwater Program.

This program must provide opportunities for public participation of the permittee's permit renewal and shall, at a minimum, comply with any state and local public notice requirements. Additionally, the program must provide opportunities for public participation in activities related to developing and implementing the Stormwater Management Program.

4.2.A The MS4 Operator shall hold a public notice period for a minimum of thirty (30) days to allow the public to review the draft permit, and description of the MS4s Stormwater Management Program prior to the submission of the renewal application.

The City's policy is to hold a public notice period for 30 days on the City's draft SWMP each time significant revisions to the SWMP are made and prior to the renewal application. The City will advertise the public notice of the SWMP or renewal application on the City's website under the stormwater webpage, https://www.sugar-creek.mo.us/departments/public_works/storm_water.php with the disclaimer that the draft SWMP will be posted for review and public comment for 30 days. The City also advertises the public notice period on social media, Facebook, and posting a note to the doors at City Hall. The SWMP or permit renewal application will be made available to the public through the City's website.

4.2.B As part of the public notice, the required items shall be posted on the website with a way to submit comments, along with the standard public notice methods.

The City provides an email on the City's website to send comments to as well as a mail-in option with the address posted on the website. The City will respond to all comments submitted by the public within notice period. All collected public feedback will be logged in an Excel spreadsheet with a response to each of the comments.

4.2.C The MS4 Operator shall hold a public information meeting to provide information on, or describe the contents of, the proposed Stormwater Management Program. This meeting shall be advertised at least 30 days prior to the public meeting.

1. As part of the notice of public meeting, the MS4 Operator shall post on the public website along with the standard public notice methods for the MS4. The notice of the public informational meeting, including the date, time and location.
2. The meeting must be held within the service area of the MS4. Co-permittees shall hold the meeting within the boundaries of each co-permittee.

The City will hold a public information meeting within one of the City Council meetings. This item will be added to the City Council agenda. The Stormwater Management Program will be gone over and public comments recorded during this City Council meeting. The public will be notified of the City Council agenda through means of social media, Facebook, posting a note to the doors at City Hall and a notice on the City's stormwater webpage. The SWMP or permit renewal application will be made available to the public through the City's website. All public

feedback will be logged in an Excel spreadsheet and in the City Council meeting notes.

4.2.D The MS4 Operator shall have a publicly available method to accept public inquiries, or concerns, and to take information provided by the public about stormwater and stormwater related topics.

The City provides a phone number on the City's website as well as a mail-in address posted on the website. The City also provides a customer comment drop box in the lobby of the City hall building for handwritten comments/concerns/ inquiries. The City will respond to all stormwater comments submitted by the public within 30 days of receipt and copies of all comments submitted by the public and the corresponding responses are retained by the City for at least 3 years. All collected public feedback will be logged in an Excel spreadsheet with a response to each of the comments.

4.2.E If the permittee utilizes a stormwater management panel or committee, the permittee shall provide opportunities for citizen representatives on the panel or committee.

The City does not utilize a stormwater management panel or committee.

4.2.F If the permittee has a governing board such as; County Council, City Council, or Board of Curators, a representative of the MS4 Operator, who is familiar with the MS4 Stormwater Program, shall provide an update to the governing board. This shall be conducted at minimum, annually with the status of, or updates on , the Stormwater Management Program, and compliance with the Stormwater Management Program.

A City staff member who is familiar with the MS4 Stormwater Management Program will update the City Council annually at one of the City Council meetings about the initiatives taken towards meeting the program goals over the past year, feedback they have received on the program and future initiatives that will be taken by the City. The meeting agenda summary notes will be used to document City Council comments.

4.2.G Using adaptive management, all MS4 Operators shall review their Public Participation Program, at minimum, annually and update implementation procedures as necessary within the requirements of this permit. This shall be used to review how to best reach the public, the effectiveness of the mechanisms, the effectiveness of reaching the public and the MS4 Governing board and if the community and MS4 government are working together for water quality. Any additional events and/or BMPs shall be acknowledged in the Stormwater Management Program report.

A City staff member who is familiar with the MS4 Stormwater Management Program will review the program efforts and effectiveness in reaching the public and review any comments annually. Adjustments will be made as necessary to increase needed public awareness and participation and any changes will be documented and included in the Stormwater Management Program report.

4.3 MCM 3. Illicit Discharge Detection and Elimination

The MS4 Operator shall implement and enforce a program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200 at 40 CFR 122.26(b)(2)) into the permittee's regulated MS4.

4.3.A A current storm sewer system map that shall be updated as needed to include features which are added, removed, or changed. This map may be paper or electronic.

The City has located all of the MS4 outfall locations. The NPDES permitted outfall is located along Sterling Ave just north of Elizabeth St. All other storm water outfalls with the system have been located and input into the City's GIS system.

The name and locations of all receiving waters of the state that receive discharges from the MS4 outfalls have been identified. These are Sugar Creek, Mill Creek and the Missouri River.

The boundary of the regulated MS4 area has been identified as the area with the City of Sugar Creek.

The stormwater system is available with the City's GIS system and can be readily viewed by staff through the ArcGIS Online website.

4.3.B. The MS4 Operator must record the sources of information used for the map and track.

The City collects any data on the outfalls in the field using the Fulcrum app. The outfalls are all numbered beginning at 1 as they are located in the field. The date that any data is collected is automatically updated in the Fulcrum app. Any updates to the Fulcrum app are put into the City's GIS system.

4.3.C The MS4 shall effectively prohibit non-stormwater discharges into the permittee's storm sewer system and implement appropriate enforcement procedures and actions.

The City's Code of Ordinances prohibits littering and polluting of water in Chapter 34 – Parks and Recreation, Sec. 34-3. The City's Code of Ordinances is located on the website:

https://library.municode.com/mo/sugar_creek/codes/code_of_ordinances?nodeId=COOR_CH34PARE_S34-3LIPOWAPR

https://library.municode.com/mo/sugar_creek/codes/code_of_ordinances?nodeId=COOR_CH46UT_ARTICLE_IVSTWARE_DIV2STWADIASINACINCOAC

The City's Code of Ordinances outlines penalties and other remedies for violations of the Chapter 34 – Parks and Recreation ordinances. The City's code of Ordinances is located on the website:

https://library.municode.com/mo/sugar_creek/codes/code_of_ordinances?nodeId=COOR_CH34PARE_S34-18PEOTRE

https://library.municode.com/mo/sugar_creek/codes/code_of_ordinances?nodeId=COOR_CH46UT_ARTICLE_IVSTWARE_DIV2STWADIASINACINCOAC

4.3.D The MS4 Operator shall develop a dry weather field screening strategy. The permittee shall conduct outfall field assessments. The screening shall be conducted during dry weather conditions (a minimum of 72 hours after the last precipitation event) to check for the presence of a discharge. Dry weather screening shall include a checklist or other tracking device to ensure a complete inspection of each outfall, enhance consistency, and to track the field screening. When discharge is present, the checklist or tracking device shall note general observations and physical characteristics at a minimum.

The City will conduct dry weather field screening on 25% of the outfalls each year. The dry weather screening will be conducted along stream outfalls during a dry period. The City will identify priority area outfalls which will be inspected first. The priority areas will be identified by evaluating the watershed upstream of each outfall along the stream. The watersheds will be prioritized in order to determine the risk of potential illicit discharges based on multiple criteria factors such as: heavy industrial use, light industrial/business areas, approximate age of development, gasoline/oil/carwash related businesses, past discharge complaints, NPDES permitted facilities, and aging or failing sewer infrastructure. The following information will be collected for each dry weather field screening:

- Date and time
- Weather conditions and temperature
- Color of discharge
- Estimated flow rate
- Odor
- Surface scum, algal bloom, floatables or oil sheen present
- Deposits or stains
- Turbidity
- Stream impact including vegetation, fish, wildlife
- Length of impacted stream
- Notes of an obvious source of flow

All of the data collected during the dry weather screenings will be collected within the Fulcrum app.

4.3.E The MS4 Operator shall maintain diagnostic monitoring procedures to detect and investigate unknown non-stormwater flows as part of the dry weather screening program.

Indicators such as odor, color, turbidity and floatables will be visually inspected and marked on the dry screening inspection form if they are present. The description of the indicators will be included on the form. If any of the indicators look to be severe then a sample will be sent to the lab for further testing and confirmation of the illicit discharge.

4.3.F The MS4 Operator shall maintain procedures for tracing the source of an illicit discharge. If initial screening indicates that a dry weather discharge contains pollutants, or if an illicit discharge is suspected from another reporting method, the source shall be traced.

If it is confirmed from the lab that there is an illicit discharge or if an illicit discharge is suspected, then the discharge will be traced to locate the exact discharge location. The illicit discharge flow will be visually followed upstream until it can no longer be seen. Continuing testing upstream of the flow will be completed if required. It will then be determined where the illicit discharge is coming from.

4.3.G The MS4 Operator shall maintain procedures for removing the source of the discharge. After locating the source, the pollutant and source must be removed. The exact procedure will depend on the source and circumstances.

If illicit discharges are confirmed at a specific location, a letter of violation will be issued to the property owner. The violation letter will give the property owner a time frame to remove the illicit discharge. If the illicit discharge is not removed water and/or sewer services may be shut off per City Ordinances. If the MS Operator determines that the discharge presents imminent and substantial danger to the environment or to the health or welfare of persons, the City may remove the discharge and conduct any necessary cleanup work to the waters. The costs for this removal would be passed on to the property owner.

4.3.H In order to prevent further illicit discharge, the MS4 Operator shall identify priority areas. Annually, the MS4 Operator shall evaluate this priority area list and/or map and update as necessary to reflect changing priorities.

Any discovered illicit discharges will be recorded. These discharges will be inspected annually to ensure the illicit discharge has been removed for at least 3 years after the discharge has been discovered. The City will identify priority area outfalls which will be inspected first. The priority areas will be identified by evaluating the watershed upstream of each outfall along the stream. The watersheds will be prioritized in order to determine the risk of potential illicit discharges based on multiple criteria factors such as: heavy industrial use, light industrial/business areas, approximate age of development, gasoline/oil/carwash related businesses, past discharge complaints, NPDES permitted facilities, and aging or failing sewer infrastructure. A list of which discharges have been inspected each year will be recorded.

4.3.I The MS4 Operator shall maintain written procedures for implementing the IDDE Program, including those components described within this section, to ensure program continuity and consistency.

The City will follow the written procedures outlined in this Stormwater Management Program. The inspections reports will be kept on file and the illicit discharges found will be recorded and monitored after removal.

4.3.J The MS4 Operator must conduct investigations in response to field screening discoveries, spills, or in response to complaints from the public, municipal staff, or adjacent

MS4s.

1. Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment.
2. Investigate with five (5) business days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge which does not constitute a threat to human health, welfare or the environment.
3. If illicit connections or illicit discharges are observed related to, discharging to, or discharging from, an adjacent MS4 Operator's municipal storm sewer system, the MS4 Operator must notify the other MS4's Operator within 24 hours of discovery or as soon as practicable.

The City will investigate any known spills or complaints from the public, municipal staff or adjacent MS4s within five (5) business days. Inspections will be conducted immediately if the illicit discharge is determined to constitute a threat to human health, welfare, or the environment. A screening form will be completed for each illicit discharge inspected. Lab testing will be conducted as necessary. All information collected will be recorded. Any illicit discharges from adjacent MS4s will be communicated to that MS4 immediately.

4.3.K The MS4 Operator shall have procedures for appropriate enforcement, this may include fines, the ability to collect cleanup and abatement costs, and actions to ensure that the permittee's illicit discharge ordinance is being implemented.

If illicit discharges are confirmed at a specific location, a letter of violation will be issued to the property owner informing the property owner that the illicit discharge will need to be removed. If the illicit discharge is not removed the City may suspend water and/or sewer services until violator presents proof that the illicit discharge has been removed, require the violator to pay for all costs incurred in responding to, abating, and remediating the discharge, and/or require violator to pay for all costs incurred in reinstating services or access, per City Ordinances.

4.3.L The MS4 Operator shall maintain a database, or other centralized system, to track dry weather field screenings, spill, incidents, and investigations.

All dry weather screening data will be kept within the Fulcrum app for at least a period of 3 years. An excel spreadsheet will be kept with the locations and dates of the inspections, illicit discharge findings, investigations and remediations.

4.3.M The MS4 Operator shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, this may work with part 4.1 and part 4.6 of this permit.

Fact sheets or brochures will be available at City Hall. These will have information on various stormwater management topics, including illegal discharges and improper disposal of waste. A minimum of two articles annually will be published in the City's Sweet Talk newsletter to address activities or pollutants of concern at seasonally appropriate time. Information on illegal discharge hazards will also be posted under the City's stormwater website page under departments / Public Works / Storm Water. This page will be up to date with stormwater management information and links to further data.

4.3.Q The MS4 Operator must develop and implement or maintain a training program for all municipal field staff, who, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system. Reviews of the training effectiveness shall be considered after municipal site inspections or after an illicit discharge incident occurs. If a certain department or facility did not perform the way they were trained, or if an issue arises that was not handled properly, the MS4 Operator should consider if the training is enough or is ineffective. The MS4 Operator shall consider ways to survey or test staff to see if the training is effective.

All new City staff that collect data for the storm water management program will be trained on the illicit discharge forms, how to collect the data, illicit discharge testing, illicit discharge tracing and remediation and how to get data from the GIS and how to incorporate storm sewer system changes into the GIS. Existing City staff will have refresher training as necessary to ensure they are familiar with the illicit discharge procedures. All City staff will be trained if any changes are made to the illicit discharge procedures. Any training conducted will be recorded with the date and participants and what the training went over. After training City staff will be evaluated by observing an illicit discharge inspection by the trained MS4 Operator. A trained City staff will accompany new trainees to all inspections conducted until it is felt that the new trainee can conduct the illicit discharge connections on their own.

4.3.R Using adaptive management the MS4 Operator shall review their IDDE Program, at minimum, annually and update implementation procedures as necessary. This data shall be used to continuously evaluate the effectiveness of each BMP and the implementation of each BMP. Any additional BMPs shall be acknowledged in the Stormwater Management Program report.

City will review the IDDE program annually to determine the effectiveness. If any inefficiencies are discovered, the procedures will be revised and implementation will be updated. City will keep a spreadsheet as to when the program was reviewed and what changes were made.

4.4 MCM 4. Construction Site Stormwater Runoff Control

The MS4 Operator shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

4.4.A The MS4 Operator shall have a law, ordinance and/or other regulatory mechanism to require construction site runoff control BMPs at construction/land disturbance sites greater than or equal to one (1) acre or less than one acre if the construction activity is part of a larger common plan or development or sale that would disturb one acre or more. The mechanism shall include sanctions which are designed to ensure compliance, to the extent allowable under State, or local law.

The City's Code of Ordinances includes Erosion and Sediment Control. The City's Code of Ordinances is located on the website in the following location:

https://library.municode.com/mo/sugar_creek/codes/code_of_ordinances?nodeId=COOR_CH18EN_ARTIIERSECO_S18-144INPU

The ordinance is reviewed annually and updates are made as needed.

4.4.B The MS4 Operator shall review pre-construction plans.

The City reviews all pre-construction site plans for potential water quality impacts. The measurable goal for implementation of construction plan review is to complete the reviews of new and redevelopment projects disturbing more than one acre in a timely manner ensuring that selected BMPs are appropriate for the site. This is an ongoing program. The number of plans reviewed is documented annually in an Excel spreadsheet. The City requires all design, construction and maintenance standards to be in accordance with the most current standards established in APWA. The City will review each erosion control permit and plan to determine its conformance with the APWA provisions. The City of Sugar Creek also requires, by ordinance, a Stormwater Pollution Prevention Plan (SWPPP) that in addition to an erosion and sediment control plan, addresses other wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste. All of the submittals will be checked for compliance with the APWA Storm Drainage BMP Manual.

4.4.C The MS4 Operator shall establish authority for site inspections and enforcement of control measures. To the extent allowable by state, federal, and local law, all MS4 Operators shall implement procedures for inspecting construction /land disturbance projects.

The City's Erosion and Sediment Control Ordinance states that by submitting a development plan or applying for an erosion control permit, the applicant consents to inspections of the proposed development site and all of the work. All sites that have applied for an erosion control permit will be inspected by the City. The construction site inspections include assessment of compliance with the City's construction site storm water runoff control ordinance. The inspections evaluate any structure that functions to prevent pollution of stormwater or to remove pollutants from stormwater and use enforcement polices to require BMPs are implemented and effective. City will complete a final

inspection upon completion of the land disturbance and prior to final approval of construction project. City will ensure all disturbed areas have been stabilized and that all temporary erosion and sediment control measures are removed. All inspections and findings will be recorded within an Excel spreadsheet.

4.4.D The construction site runoff control program shall include an established, escalating enforcement policy that clearly describes the action to be taken for violations. The program shall have written procedures for ensure compliance with the MS4 Operator’s construction site runoff control regulatory mechanism.

The City’s Erosion and Sediment Control Ordinance states that in the event that any legal entity holding an erosion control permit violates the terms of the permit, or implements site development in such a manner as to materially adversely affect the health, welfare, or safety of persons residing or working in the neighborhood or development site so as to be materially detrimental to the public welfare or injurious to property or improvements in the neighborhood, the City may suspend or revoke the erosion control permit and issue a stop-work order. If after 48 hours of posting a stop work order, the City may go on the land and commence work and charge the contractor for the work against the performance bond. Violations of the terms of the permit can be deemed a misdemeanor and each day during which any violation of any of the provisions of the permit is committed, continued or permitted, shall constitute a separate offense. Upon conviction permittee can be fined not more than \$1,000 or up to one year in jail for each offense.

4.4.E The MS4 Operator shall require the construction site operator to conduct inspection at minimum:

1. Every fourteen (14) days , when construction is active.
2. Within 72 hours of any storm event, and within 48 hours after any storm event equal to or greater than a 2-year, 24-hour storm has ceased.

Checklists used for these inspections conducted by construction site operators shall either be submitted to the MS4 Operator, or the MS4 Operator shall verify that these inspections are being conducted by the construction site operator checklists during the MS4 Operator inspection.

City requires permittee to follow APWA criteria. Phasing is required on all sites disturbing greater than 30 acres. Graded areas must be stabilized as soon as work is complete or if work is interrupted for 21 or more calendar days. Re-vegetation of the site will be initiated as soon as is practicable following the initiation of grading work. Vegetation will be sufficient density to provide effective erosion control and must be reestablished within 14 days following completion of major grading work. Permittee shall have an approved SWPPP. City will verify all items within the SWPPP have been addressed by permittee and that permittee is maintaining records of all inspections and maintenance performed.

4.4.F The MS4 Operator shall maintain an inventory or active public and private land disturbance sites, as defined in Section 4.4 of this permit. This may be supplemented with records such as a plan review checklist and email correspondence.

All land disturbance sites will be tracked in an Excel spreadsheet. Each site will contain the project name, location, contact information, address, phone number, side of the project and area of disturbance. All correspondence will be recorded within the excel spreadsheet.

4.4.G The MS4 Operator shall track their oversight inspections. This may be done by retaining copies of the records such as inspection checklists and email correspondence. The MS4 Operator must make these inventories available to the Department upon request.

All inspections conducted by the City will be documented in the Excel spreadsheet under each land disturbance site. The inspection date, time, inspector name, finding and follow up actions and dates including corrective actions and enforcement actions will be documented. Along with correspondence and scanned permittee inspections completed and documented.

4.4.H Existing permittees: Review the Stormwater Management Program including ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures to ensure compliance with these requirements. Any changes necessary to be in compliance with this permit shall be completed within the first year of this permit issuance.

City will review the Stormwater Management Program including ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures yearly to ensure compliance with the requirements. Any necessary revisions will be completed within the first year of this permit issuance.

4.4.I Newly Regulated permittees – Does Not Apply

4.4.J The Stormwater Management Program must include procedures for the MS4 Operator to receive and consider information submitted by the public about land disturbance sites. This may be in combination with 4.2.D of this permit.

The City may receive public input about land disturbance sites via phone call received, comments within the drop box at City Hall, and comments received from email. Any public comments received will be documented in the Excel spreadsheet under the disturbance site information. All public comments will be investigated and responded to by City as necessary. All City actions and responses will be documented in the Excel spreadsheet under the disturbance site information.

4.4.K The MS4 Operator shall provide, or support access to, construction site runoff control training for MS4 inspectors and plan reviewers at minimum once during this permit cycle. This education shall be tracked or documented.

All new City staff that conduct construction site runoff control inspections will be trained on erosion control permit and plan requirements, SWPPP requirements, site runoff control inspections and documentation. This training will be recorded with the date and participants in an Excel Spreadsheet. The requirements and inspection procedures will be gone over with all City staff that conduct construction site runoff control inspections at minimum once during the permit cycle. This training will be recorded with the date and participants in an Excel Spreadsheet.

4.4.L The MS4 Operator must provide written procedures outlining the local inspection and enforcement procedures to their inspectors to ensure consistency among the inspections.

City inspectors will review land disturbance permits, erosion control plans and permits and approved SWPPP prior to conducting any field inspections. City will conduct field inspections every 14 days that construction is active and within 72 hours of any storm event, and within 48 hours after any storm event equal to or greater than a 2-year, 24-hour storm has ceased. The inspector will verify all SWPPP items have been addressed and permittee has completed inspection and maintenance of erosion and sediment control. Inspector will collect and scan all reports completed by permittee. Inspector will note any violations from the permit or SWPPP. If any violations are discovered, City inspector will issue a notice of violation to the permittee in a letter within 24 hours of field inspection findings. City inspector will follow up on violation corrections within 48 hours of violation notice given. If violation has not been corrected within the time period agreed upon then a stop work order or revocation of the permit may be given to the permittee. If it is determined that an imminent hazard exists then the City shall proceed with corrective actions and all costs incurred by the City will be collected through the project performance bond.

4.4.M Using adaptive management, all MS4 Operators shall review, at minimum annually, their Construction Site Stormwater Runoff Control Program and evaluate the ordinances, review procedures, inspection procedures, enforcement procedures, receipt of public information procedures, and effectiveness of training procedures to ensure compliance with these requirements and determine if changes are needed.

City will review their Construction Site Stormwater Runoff Control Program annually to determine the effectiveness. The City will evaluate the most common violations, how the violations are handled and how many are escalated. The City will determine if the education program can assist in reducing violations. The City will determine if the site plans match the sites when violations arise or if additional items need to be evaluated at plan review. The City will assess if public complaints are being addressed in a timely manner. The City will evaluate if the inspections are thorough and consistent across different sites. City will keep a spreadsheet as to when the program was reviewed and what changes were made.

4.5 MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment

The MS4 Operator shall continue or develop, implement, and enforce a program to address the quality of long-term stormwater runoff from new development and redevelopment projects that disturb equal to and greater than one acre, including projects less than one acre that are part of a larger common plan of development or sale that would disturb one acre or more and that discharge into the regulated MS4. The MS4's program shall ensure that controls are in place that have been designed and implemented to prevent or minimize water quality impacts

4.5.A The MS4 Operator shall maintain and utilize an ordinance(s) or other regulatory mechanism(s) to address post-construction runoff from new development and redevelopment projects to the extent allowable under state or local law for sites equal to or greater than one acre including projects less than one acre that are part of a larger common plan of development or sale.

The City has a post construction runoff control ordinance. The City follows the APWA MARC Best Management Practices Manual for all of the construction runoff control regulations. All sites shall establish stormwater management practices to control the peak flow rates of stormwater discharge associated with specified design storms and reduce the generation of stormwater. STPs are required to be sized to effectively mimic pre-construction runoff conditions to the maximum extent practicable. All stormwater treatment practices shall have a n enforceable operation and maintenance agreement, including easements for inspections and maintenance. Sufficient maps and engineering analysis shall show that the proposed stormwater management measures are capable of controlling runoff from the site in compliance with the ordinance and APWA Section 5600 and the APWA MARC BMP Manual. Final plans must show a base map, calculations, soils information, maintenance and repair plan, landscaping plan, maintenance easements, maintenance agreement, other environmental permits and performance bond/security. City must be notified of construction and must submit asbuilt information. Site must attain landscaping and stabilization requirements. City shall be granted right of entry for inspections. City may issue notice of violation when an activity is not being carried out in accordance with the requirements within the ordinance. City may issue a stop work order for violations. Violators may be required to restore land to its undisturbed condition. In the event that restoration is not undertaken within a reasonable time after notice, the City may take necessary corrective action, the cost of which shall become a lien upon the property until paid.

4.5.B The MS4 Operator shall continue or develop a strategy to minimize water quality impacts. This shall include a combination of structural and/or non-structural controls (BMPs) appropriate for the permittee's community.

1. Structural controls include but are not limited to; extended detention basins, grass swales, bio-retention, permeable surfaces, sand filter basins, stormwater planters, proprietary BMPs.

The City has adopted the 2012 American Public Works Association (APWA)/Mid American Regional Council (MARC) Best Management Practices (BMP) Manual which includes acceptable stormwater practices, including the specific design criteria for each stormwater practice. Stormwater treatment practices that are designed and constructed in accordance with these design and sizing criteria will be presumed to meet the minimum water quality performance standards.

2. Non-structural controls include but are not limited to; stream buffers, no mow zones, preservation of open spaces, tree preservation, impervious cover reduction, land use planning, and low impact development.

The ordinance(s) or regulatory mechanism(s) for non-structural Post-Construction controls, shall include:

The City has adopted the 2012 American Public Works Association (APWA)/Mid American Regional Council (MARC) Best Management Practices (BMP) Manual which includes requirements to protect sensitive areas such as wetlands and riparian areas, to maintain open spaces, to maintain buffer zones, to minimize impervious surfaces, to minimize disturbance of soils and vegetation, CN incentives for the use of green infrastructure, to minimize directly connected impervious areas and tree preservation.

4.5.C Pre-construction plan review shall be conducted by the MS4 Operator to assess site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance. The structural or non-structural controls chosen shall; protect sensitive areas, minimize the creation of stormwater pollution, and effectively reduce stormwater pollution. This can be achieved by reasonably mimicking pre-construction runoff conditions on all affected new development projects, or the permittee may achieve this goal through a method more appropriate for its community.

The City reviews all pre-construction site plans for potential water quality impacts. The measurable goal for implementation of construction plan review is to complete the reviews of new and redevelopment projects disturbing more than one acre in a timely manner ensuring that selected BMPs are appropriate for the site. This is an ongoing program. The plans are reviewed for compliance with the 2012 American Public Works Association (APWA)/Mid American Regional Council (MARC) Best Management Practices (BMP) Manual. The non-structural BMP selection is evaluated first. All reviewed plans and comments will be documented in an Excel spreadsheet.

4.5.D The MS4 Operator shall have ordinances or similar enforcement mechanisms to ensure adequate long-term operation and maintenance (O&M) of the selected BMPs, including, as appropriate, agreements between the MS4 Operator and other parties such as post-development landowners or regional authorities.

The City's Post Construction Runoff Control Standards and the October 2012 MARC/APWA Manual of Best Management Practices for Stormwater Quality Relaying to the Development of Lands Within the City of Sugar Creek requires an enforceable operation and maintenance agreement which will include any and all maintenance easement required to access and inspect the stormwater treatment practices and to perform routine maintenance as necessary. A written description of the required maintenance is also required.

4.5.E The MS4 Operator shall inspect, or require inspection of, each water quality structural and non-structural water post-construction BMP according to the following at minimum:

The City will conduct a minimum of 1 inspection during construction and 1 inspection before the site is finalized, to verify water quality facilities are built as designed and any applicable boundaries or practices for non-structural BMPs are being observed. These inspections will be

conducted in combination with the MCM 4 inspections. The City will conduct a minimum of once in the first 3 years after the installation. The City will conduct annual inspection of the post-construction BMP. Each inspection will be documented with date, location and findings within an Excel spreadsheet. The City will inspect a minimum of 60% of all water quality post-construction BMPs within the five year permit cycle.

4.5.F The MS4 Operator must maintain a plan designed to ensure compliance with the MS4's post-construction water quality regulatory mechanism. This plan shall include escalating enforcement mechanisms the MS4 Operator will use to ensure compliance.

The MS4 Operator must have the authority to initiate a range of enforcement actions to address the variability and severity of noncompliance.

Per the City's Post Construction Runoff Control Standards and the October 2012 MARC/APWA Manual of Best Management Practices for Stormwater Quality Relaying to the Development of Lands Within the City of Sugar Creek ordinance, if the permittee fails or refuses to meet the requirements of the maintenance covenant, the City, after reasonable notice, may correct a violation of the design standards or maintenance needs by performing all necessary work to place the facility in proper working condition. In the event that the stormwater management facility becomes a danger to public safety or public health, the City shall notify the party responsible maintenance of the stormwater management facility in writing. Upon receipt of that notice, the responsible person shall have 15 days to effect maintenance and repair of the facility in an approved manner. After proper notice, the City may assess the owner of the facility for the costs of repair work and any penalties, and the cost of the work shall be a lien on the property, or prorated against the beneficial users of the property, and may be place on the tax bill and collected as ordinary taxes by the county

4.5.G Enforcement actions shall be timely in order to ensure the actions are effective. The MS4 Operator shall begin enforcement actions within thirty (30) days of discovering a violation.

Per the City's Post Construction Runoff Control Standards and the October 2012 MARC/APWA Manual of Best Management Practices for Stormwater Quality Relaying to the Development of Lands Within the City of Sugar Creek ordinance, when the City determines that an activity is not being carried out in accordance with the requirements, is shall issue a written notice of violation to the owner of the property. This notice shall contain the name and address of the owner, that address upon which the violation is occurring, a statement specifying the nature of the violation, a description of the remedial measure necessary to bring the development activity into compliance and a time schedule for the completion of such remedial actions, a statement of penalty, a statement that the determination of violation may be appealed by filing a written notice of appeal within 15 days. Persons receiving a notice of violation will be required to halt all construction activities. The stop work will be in effect until the City confirms that the development activity is in compliance that the violation has been satisfactorily addressed. Failure to address a notice of violation in a timely manner can result in civil, criminal, or monetary penalties in accordance with the enforcement measures authorized by City. Any violator may be required to restore land to its undisturbed conditions. In the event that restoration is not undertaken with a reasonable time after notice, the City may take necessary corrective action, the cost of which shall become a lien upon the property until paid.

4.5.H The MS4 Operator shall maintain an inventory tracking the water quality post-construction BMPs.

The City will document all post construction BMPs within an Excel Spreadsheet. The spreadsheet will list each project, contact information, type of post construction BMP used, all applicable operation and maintenance documents, the date the construction plan was approved, all inspection and maintenance records including inspection dates, times, inspector names, inspection findings and any violations the remedial and/or enforcement actions taken.

4.5.I The MS4 Operator shall also track the post-construction BMP inspections. This may be done by retaining copies of records such as inspection checklists and email correspondence. The MS4 Operator must make these inventories available to the Department upon request.

The City will document all post construction BMPs within an Excel Spreadsheet. The spreadsheet will list each project, contact information, type of post construction BMP used, all applicable operation and maintenance documents, the date the construction plan was approved, all inspection and maintenance records including inspection dates, times, inspector names, inspection findings and any violations the remedial and/or enforcement actions taken.

4.5.J Existing permittees: Evaluate the ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures to ensure compliance with these requirements and determine if changes are needed. Any changes necessary to be in compliance with this permit shall be completed within the first two (2) years of permit issuance. The inventory of water quality facilities must be updated as new facilities are added and projects are completed. If the MS4 Operator needs to develop this inventory, it shall be completed within two (2) years of this permit issuance.

City will review the Stormwater Management Program including ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures yearly to ensure compliance with the requirements. Any necessary revisions will be completed within the first two years of this permit issuance. The stormwater system mapping and inventory will be updated annually as new facilities are added and projects are completed.

4.5.K Newly regulated permittees: Does Not Apply

4.5.L The MS4 Operator shall provide appropriate training for MS4 inspectors at minimum once every permit cycle. This may include Green Infrastructure training, or specific operation of proprietary post-construction BMPs. The MS4 shall provide overall training to explain the function of both structural and non-structural post-construction water quality BMPs.

All new City staff that conduct post construction site runoff control inspections will be trained on post construction BMP requirements, inspections and documentation. This training will be recorded with the date and participants in an Excel Spreadsheet. The MARC/APWA Manual of Best Management Practices for Stormwater Quality requirements and City inspection procedures will be gone over with all City staff that conduct post construction site runoff control inspections at minimum once during the permit cycle. The training will explain the function of both structural and non-structural post-construction water quality BMPs. This training will be

recorded with the date and participants in an Excel Spreadsheet.

4.5.M Using adaptive management, all MS4 Operators shall review, at minimum annually, their Post-Construction Site Stormwater Management in New Development and Redevelopment Program and evaluate effectiveness of the overall program and determine if changes are needed.

City will review their Post-Construction Site Stormwater Management in New Development and Redevelopment Program annually to determine the effectiveness. The City will review the number and types of developments, how many BMPs were installed and inspected, the amount of the watershed area being treated, the types of violations found and how frequently and how education could improve the effectiveness of the program. City will keep a spreadsheet as to when the program was reviewed and what changes were made.

4.6 MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

The permittee shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

4.6.A The MS4 Operator shall maintain and utilize an employee training program for MS4 municipal operations staff. The training shall be given at minimum annually to all MS4 staff who work with material handling, at MS4 owned or operated vehicle/equipment maintenance areas, storage yards, and material storage facilities. This may be broken up into staff units, or by applicable topics.

The City will conduct training for all municipal operations staff. The City will utilize MARC training materials on proper management of municipal vehicle and equipment maintenance areas and storage yards; proper land disturbance site management; long-term BMP maintenance; and proper material handling at storage facilities. Trainings will be conducted for each new hire, and annual refreshers for each applicable department. This training will be recorded with the date and participants in an Excel Spreadsheet.

4.6.B The training shall be used to prevent and reduce stormwater pollution. The training shall cover a minimum of the following topics/ activities (if applicable to the MS4):

The City training shall cover vehicle equipment and washing, fluid disposal and spills, fleet, equipment, and building maintenance, park and open space maintenance procedures (including fertilizer, herbicide, pesticide application), new construction road maintenance, and land disturbances, stormwater system maintenance, MS4 operated salt and de-icing operations fueling, solid waste disposal, street sweeper operations and illicit discharges. The training for each of the subjects will be recorded with the dates and participants in an excel spreadsheet.

4.6.C The MS4 Operator shall:

The City will utilize MARC training materials on each of the training subjects. The training for stormwater pollution prevention for municipal operations will be conducted along with all of the training for the each of the MCMs as described in this stormwater management program. Topic specific training such as swimming pool discharges, leaf disposal and salt clean-up will be included in the training.

4.6.D The MS4 Operator shall maintain a list of all municipal operations/facilities that are impacted by this operation and maintenance program.

The City has created a list of municipal operations that are relevant to the MS4 program. This list includes: street, sidewalk and parking lot operation and maintenance; storm sewer operation and maintenance; wastewater collection system operation and maintenance; maintenance of city buildings and other facilities; fire department field operations; police department field operations; and all city vehicle and equipment maintenance. Additionally, any construction or land disturbance undertaken by City crews or by contractors to the City would be considered “municipal operations”. The following are all municipal operations/facilities that are impacted by the operation and maintenance program

- Public Works Building – 1104 Lake Street
- City Hall – 103 S. Sterling Ave
- Police and Fire – 1001 Heroes Way
- Mike Onka Community Hall – 11520 Putman Street

4.6.E The MS4 Operator shall maintain a list of industrial facilities the MS4 Operator owns or operates which are subject to NPDES permits for discharges of stormwater associated with industrial activity. The list shall include the permit number or a copy of the No Exposure Exemption Certification (if applicable) for each facility.

This includes Municipal projects with a land disturbance permit, wastewater facilities, airports, etc. NPDES permitted facilities not owned or operated by the permittee are not required to be part of the list, however the MS4 Operator should be familiar with all such facilities in their MS4 service area as they may signify a priority area for the IDDE program.

The City's NPDES permit (MOR040000) covers all areas served by the MS4. The City does not have any industrial facilities that they operate or maintain that are subject to the NPDES permit. The City's list of facilities is reviewed annually and updated as needed.

4.6.F The MS4 Operator shall develop or maintain controls for reducing or eliminating the discharge of floatables and pollutants from municipal facilities listed in Section 4.6.D and 4.6.E.

Facility	Potential Pollutant Sources	BMPs	Spill Protection	Salt Storage
Public Works Building	Salt, Sand, and vehicle oil, vehicle washing, paints solvents	Parking lot swept and storm inlets cleaned out, paint, solvents, oils are stored in containers and not exposed to stormwater	Catch system for vehicle oil, absorbant socks & pads for spills, wash vehicles in bay that drains to sanitary	Covered containers, brine is stored in underground storage facility
City Hall	Parking lot debris including salt in winter and leaves in storm inlets	Parking lot swept and storm inlets cleaned out	Street debris and salt is taken to landfill, leaves are taken to compost	None
Police and Fire Building	Parking lot debris including salt in winter and leaves in storm inlets	Parking lot swept and storm inlets cleaned out	Street debris and salt is taken to landfill, leaves are taken to compost	None
Community Hall	Parking lot debris, including salt in winter and leaves in storm,CO2 tanks	Parking lot swept and storm inlets cleaned out, CO2 tanks stored away from stormwater	Street debris and salt is taken to landfill, leaves are taken to compost	None

Inspections and activities related to the control of pollutants from City-owned operation and maintenance facilities will be reported on annually.

4.6.G The MS4 Operator shall have procedures for proper disposal of waste removed from the MS4 structures and areas of jurisdiction.

All debris collected from street sweeping activities are taken to the local landfill for disposal. All leaves and debris removed from storm inlets is taken to compost. All trash and debris collected from streams is gathered in trash bags and disposed of through the trash service.

4.6.H The MS4 Operator shall maintain and utilize the following procedures, at minimum, for the washing of all municipal vehicles and equipment (if applicable to the MS4):

The City will use soap or detergent to wash municipal vehicles and equipment in the public works bay which drains to the sanitary sewer. Any wash or rinse water that contains pollutants such as salt, oils, grease, sediment, grass clippings, lawn chemicals or pesticides is not discharged to waters of the state or the MS34 system without appropriate treatment.

4.6.I The MS4 Operator shall maintain written explanation of the controls, procedures, inspection schedules, and explanation of tracking of these controls. Tracking may be done by

retaining inspection reports or checklists.

Individual Stormwater Pollution Prevention Plans (SWPPP) or one overarching Operations and Maintenance Manual (O&M Manual) for all applicable MS4 facilities may be used to comply with this requirement.

City will inspect each facility yearly to determine if any potential pollutant sources could be getting into the stormwater. Routine street sweeping at all of the facilities will take place multiple times per year and will be recorded on an excel spreadsheet with the date, location and distance of street swept. Storm inlets will be cleaned out at municipal facilities after every heavy storm event and will be recorded on an excel spreadsheet with the date, location and structure ID. All potential pollutant sources will be checked yearly to ensure their proper storage and containment. Any spills will be documented in an excel spreadsheet including the date, potential pollutant source, location of spill and action taken

Annually, the MS4 Operator shall evaluate the results, controls, and inspection procedures to ensure compliance with these requirements and determine if changes are needed. This evaluation may also aid in finding priority areas or pollutants in relation to MCM 3, or adding more education in relation to MCM 1.

The City will review the results, controls, and inspection procedures to ensure compliance on an annual basis. The review will be documented in an Excel spreadsheet and will include the location inspected, the issues found, changes made and if follow-up is needed.

4.6.J The MS4 Operator shall maintain procedures to determine if there are impacts to water quality for new flood management projects, if applicable. Any flood management projects shall require the protection of water quality in the standards that are used to plan, design, build, and maintain stormwater infrastructure.

Flood management projects are those projects developed or designed to reduce flooding.

New flood management projects completed by private developers will be required to follow the MARC BMP Manual which requires the treatment of the water quality storm (aka “first flush”). The review engineer will determine whether or not the development plans submitted accomplish this goal. The City of Sugar Creek rarely completes new flood management projects. However, in the event that one is planned, the City Engineering Consultant will review the plans to determine if the water quality storm has been effectively treated. The City has developed a list of existing flood control projects. At this time, all of these projects are privately owned and there is no enforcement mechanism to require retrofitting unless a redevelopment occurs in the contributing watershed. However, when such a redevelopment occurs, treatment of the water quality storm will be required. Any new flood management projects will be documented.

4.6.K Existing permittees: Shall evaluate the current Stormwater Management Program including training, inspection procedures, and other municipal operation procedures to ensure compliance with these requirements. Any changes necessary to be in compliance with this permit shall be completed within one (1) year of this permit issuance.

City will review the Stormwater Management Program including ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures yearly to ensure compliance with the requirements. Any necessary revisions will be completed within the first year

of this permit issuance.

4.6.L Newly regulated permittee: Does Not Apply

4.6.M Using adaptive management, all MS4 Operators shall review their Municipal Operations Program, at minimum, annually and update implementation procedures as necessary within the permit requirement.

City will review their Municipal Operations Program annually to determine the effectiveness. City will keep a spreadsheet as to when the program was reviewed and what changes were made.

5.3 MS4 Stormwater Management Program Report

5.3.A A report to the Department on the status of the MS4's program is due annually on or before February 28th. This report shall cover the previous year from January 1st to December 31st. The report shall be submitted on the Department approved, MS4 Stormwater Management Program Report form. If approved by the Department, permittees may submit the MS4 Stormwater Management Program Report using an alternative report format. The MS4 Operator shall submit the MS4 Stormwater Management Program.

The City will submit the annual report through the eDMR system.