



Minnesota Pollution Control Agency

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

MS4 SWPPP Application for Reauthorization

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

Doc Type: Permit Application

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

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

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

General Contact Information (*Required fields)

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

*MS4 permittee name: City of Edina *County: Hennepin
(city, county, municipality, government agency or other entity)
*Mailing address: 4801 W. 50th Street
*City: City of Edina *State: MN *Zip code: 55424
*Phone (including area code): 952-927-8861 *E-mail: mail@edinamn.gov

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

*Last name: Adler *First name: Laura
(department head, MS4 coordinator, consultant, etc.)
*Title: Water Resources Coordinator
*Mailing address: 7450 Metro Blvd.
*City: City of Edina *State: MN *Zip code: 55439
*Phone (including area code): 952-826-0445 *E-mail: ladler@edinamn.gov

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

Last name: Carlson First name: Jesse
(department head, MS4 coordinator, consultant, etc.)
Title: Water Resources Project Manager
Mailing address: 477 Temperance Street
City: St. Paul State: MN Zip code: 55101
Phone (including area code): 651-286-8464 E-mail: jcarlson@wsbeng.com

Verification

- I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). Yes
- I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. Yes

Certification (All fields are required)

- Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Scott Neal
(This document has been electronically signed)

Title: City Manager Date (mm/dd/yyyy): 12/30/2013

Mailing address: 4801 W. 50th Street

City: Edina State: MN Zip code: 55424

Phone (including area code): 952-826-0401 E-mail: sneal@EdinaMN.gov

Note: The application will not be processed without certification.

Stormwater Pollution Prevention Program Document

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

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

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

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

The City of Edina currently has no formal partnerships with other MS4s. They do promote educational activities presented by the Minnehaha Creek Watershed District and Nine Mile Creek Watershed District. The watershed districts also have active permitting programs for erosion and sediment control and post-construction stormwater management. The goal will be to develop the following partnerships:

- Education program implementation
- Construction site erosion and sediment control regulation
- Post-construction stormwater management regulation
- Project funding for TMDL implementation projects

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

Illicit discharges

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

1. If yes:

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

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

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

Citation:

Direct link:

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

2. If no:

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

The City Code Chapter 23, Article II., Public Nuisances has language regarding the pollution or contamination of any well, cistern, stream, lake, canal, or body of water by sewage, creamery, or industrial waste, or other substance; however based upon review the City will either create a new ordinance or revise the existing ordinance to address the requirement of the MPCA MS4 permit. During the development of the new or revised ordinance the City will review the EPA model ordinance to prepare an ordinance that effectively prohibits non-stormwater discharges as per Part III.D.3.b of the MS4 permit and eliminates those discharges using ERPs as per Part III.B of the MS4 permit. The final ordinance will be adopted within 12 months of the City receiving permit coverage.

Construction site stormwater runoff control

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

1. If yes:

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

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

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

Citation:

City Code Chapter 10, Article II. - Landscaping, Screening and Erosion Control

City Code Chapter 10, Article IV. - Demolition Permit and Buidling Permits for Single and Two Family Dwelling Units

City Code Chapter 10, Article VII. - Littering in the Course of Construction Work

City Code Chapter 30, Article I. - Vegetation

Direct link:

All codes listed above can be found at the following link:

<http://library.municode.com/index.aspx?clientId=15157>

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

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

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

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

We will update our construction site stormwater runoff control regulatory mechanism to be at least as stringent as the MPCA CSW permit. This effort will be completed within 12 months of the date permit coverage is extended.

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

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

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

The City currently has language in City Code Chapter 10, Articles II., IV., and VII. and City Code Chapter 30, Article I. regarding erosion control, sediment control, and management of solid wastes, but the language is not as stringent as MPCA CSW requirements. The City code may be revised to include language that is at least as stringent as the MPCA CSW permit for items C.1 through C.5, C.7, and C.8 or the City will seek to establish a partnership with the watersheds.

The City will meet with the watersheds within 2 months of receiving permit coverage to determine if establishing a partnership is feasible. If a partnership is feasible and the City wishes to develop a partnership it will be established within 6 months of receiving permit coverage. The partnership will be formally adopted by referencing the City of Edina's Comprehensive Water Resources Management Plan (CWRMP) in their ordinance where Section 3.2.2, policies 6 & 7 of the plan adopts the Minnehaha Creek Watershed District and Nine Mile Creek Watershed District's rules by reference. A partnership agreement will also be established to define the role and responsibilities of each partner. If a partnership is not established the City will develop a stormwater ordinance that will meet the requirements of the MPCA CSW permits.

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?

Yes No

1. If **yes**:

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

Ordinance Contract language

Policy/Standards Permits

Rules

Other, explain: The City has an approved Comprehensive Water Resources Management Plan. Section 3.2.2, policies 6 & 7 of the plan adopts the Minnehaha Creek Watershed District and Nine Mile Creek Watershed District's rules by reference.

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

Citation:

City Code Chapter 10, Article IV. - Demolition Permit and Building Permits for Single and Two Family Dwelling Units

Comprehensive Water Resources Management Plan, Section 3.2.2, Policies 6 & 7

Nine Mile Creek Watershed District Stormwater Rule

Minnehaha Creek Watershed District Stormwater Rule

Direct link:

City Code Chapter 10, Article IV.: <http://library.municode.com/index.aspx?clientId=15157>

Comprehensive Water Resources Management Plan:

http://edinamn.gov/index.php?section=engineering_water_resource

Nine Mile Creek Watershed District Stormwater Rule: <http://www.ninemilecreek.org/Regulatory/Rule04.pdf>

Minnehaha Creek Watershed District Stormwater Rule:

<http://www.minnehahacreek.org/sites/minnehahacreek.org/files/pdfs/regulatory/Stormwater%20Management%20Rule.pdf>

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

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

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. Yes No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: Yes No

- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
- 2) Stormwater discharges of Total Suspended Solids (TSS).
- 3) Stormwater discharges of Total Phosphorus (TP).
- b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: Yes No
- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
- 2) Stormwater discharges of TSS.
- 3) Stormwater discharges of TP.
- 3. Stormwater management limitations and exceptions:**
- a. Limitations
- 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: Yes No
- a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
- b) Where vehicle fueling and maintenance occur.
- c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
- d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
- 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: Yes No
- a) With predominately Hydrologic Soil Group D (clay) soils.
- b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
- c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
- d) Where soil infiltration rates are more than 8.3 inches per hour.
- 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. Yes No
- 4. Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
- a. Mitigation project areas are selected in the following order of preference: Yes No
- 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
- 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
- 3) Locations in the next adjacent DNR catchment area up-stream
- 4) Locations anywhere within the permittee's jurisdiction.
- b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Yes No
- c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. Yes No
- d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. Yes No
- e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. Yes No
- f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). Yes No

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

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

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

B.3.a.1: The City is exploring the possibility of establishing a partnership with the Minnehaha Creek Watershed District (MCWD) and Nine Mile Creek Watershed District (NMCWD) to meet this requirement. The City will meet with the watersheds within 2 months of receiving permit coverage to determine if establishing a partnership is feasible. If a partnership is feasible and the City wishes to develop a partnership it will be established within 6 months of receiving permit coverage. The partnership will be formally adopted by referencing the City of Edina's Comprehensive Water Resources Management Plan (CWRMP) in their ordinance where Section 3.22, policies 6 & 7 of the plan adopts the Minnehaha Creek Watershed District and Nine Mile Creek Watershed District's rules by reference. A partnership agreement will also be established to define the role and responsibilities of each partner and in this instance include language to prohibit the use of infiltration as described in the Permit (Part III.D.5.a(3)(a)(.1)). If a partnership is not established the City will develop a stormwater ordinance that will meet the requirements of the MPCA MS4 permit.

B.3.a.2: The City is exploring the possibility of establishing a partnership with the MCWD and NMCWD to meet this requirement. The City will meet with the watersheds within 2 months of receiving permit coverage to determine if establishing a partnership is feasible. If a partnership is feasible and the City wishes to develop a partnership it will be established within 6 months of receiving permit coverage. The partnership will be formally adopted by referencing the City of Edina's Comprehensive Water Resources Management Plan (CWRMP) in their ordinance where Section 3.22, policies 6 & 7 of the plan adopts the Minnehaha Creek Watershed District and Nine Mile Creek Watershed District's rules by reference. A partnership agreement will also be established to define the role and responsibilities of each partner and in this instance include language to restrict the use of infiltration as described in the Permit (Part III.D.5.a(3)(a)(.2)). If a partnership is not established the City will develop a stormwater ordinance that will meet the requirements of the MPCA MS4 permit.

B.4.d.: The City is exploring the possibility of establishing a partnership with the MCWD and NMCWD to meet this requirement. If a partnership is established it will include a requirement to complete mitigation projects within 24 months after the start of the original construction activity as described in the Permit (Part III.D.5.a(4)(d)). This will occur using the same process as described above.

B.5.c.: The City is exploring the possibility of establishing a partnership with the MCWD and NMCWD to meet this requirement. If a partnership is established it will include a requirement to address BMP modifications in the future as described in the Permit (Part III.D.5.a(5)(c)). This will occur using the same process as described above.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? Yes No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

The City will develop draft ERPs within 6 months of receiving permit coverage. The draft ERPs will include requirements for site inspections, criteria for elevating enforcement, and enforcement tools. The will be developed for MCM 3, 4, and 5. Enforcement mechanisms considered may

include:

- Notice of Violations
- Stop Work Orders
- Securities in the form of a performance bond, letter of credit, or cash deposit
- Misdemeanor
- Partnerships with the watersheds for enforcement of their maintenance agreement for post-construction stormwater BMPs.

The draft ERPs will be incorporated in the City Code, policy document, or a formal partnership with the watersheds within 12 months of receiving permit coverage.

B. Describe your ERPs:

The current ERPs are include in the following City Codes: Chapter 1, Sec. 1-18; Violations, Chapter 10, Article II.; Landscaping Screening, and Erosion Control, Chapter 10, Article IV.; Demolition Permits and Building Permits for Single and Two Family Dwelling Units, and Chapter 30, Article I.; Vegetation.

The City Code includes the following enforcement mechanisms:

- Misdemeanors
- Requirement for securities
- Stop work orders

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

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

The City GIS administrator updates and maintains all of the City's GIS information. The storm sewer system is updated annually with road reconstruction projects as-built information will be collected for new developments/redevelopments. The map is also updated as the City inspects their storm sewer system.

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

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

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

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

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

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

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

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

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

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

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

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

A. MCM1: Public education and outreach

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

The City of Edina is comprised of a large percentage of single family residential. The other land uses include industrial, commercial, multi-family residential, and parks. The priority of the education program has been mainly centered on issues associated with single family residential. The City sends educational information using the following:

- About Town newsletter
- Announcements made in the City Extra email notification system
- Announcements made using social media
- Use "Hometown Heroes" to help celebrate people who take pride in the community
- Video message either posted on-line or aired on the cable access channel
- Website
- Newcomer packet
- Public Works Pipeline

When events are being held in the City the Minnehaha Creek Watershed District or Nine Mile Creek Watershed District the City either partners or sponsors those events.

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
<i>Distribute Educational Materials</i>	<p><i>The City will distribute a minimum of three educational publications via City mailings, workshops, presentations, website postings, or newsletters per calendar year.</i></p> <p><i>This BMP will be revised in the new permit term to prioritize educational activities.</i></p>
<i>Implement an Education Program</i>	<p><i>The City or its designee will develop and distribute educational material and present an overview of the MS4 program and 6 minimum control measures used within the City's SWPPP at each annual public meeting, via City mailings or newsletters, and on the City's storm water web page.</i></p> <p><i>The City will provide stormwater education and outreach programs for residents within the City annually.</i></p>

	<i>This BMP will be revised in the new permit term to prioritize educational activities.</i>
<i>City Website</i>	<i>The City will update its existing storm water webpage with additional water resource related issues. Topics may include, SWPPP information, best management practices, illicit discharge prevention and detection information, information on non-point source pollution, and local contact information for residents to request further information on specific stormwater topics or to report a stormwater related infraction.</i>
<i>City Newsletter</i>	<i>The City will develop then distribute water resource related articles in the City newsletter. Article topics may include best management practices, illicit discharge information, and non-point source pollution, etc. Annually the City will distribute a minimum of two stormwater related articles.</i>
<i>Coordination of Education Program</i>	<i>City staff will coordinate with the <u>NMCWD</u> and <u>MCWD</u> to distribute educational materials and promote outreach programs. Annually the City will promote at least up to two educational workshop or presentations.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Program Evaluation</i>	<i>During yearly SWPPP review, consider which materials are most effective for our program and audiences, Use this information to determine printing numbers for future education materials. Consider information from citizen feedback related to all aspects of our SWPPP to determine education needs on a yearly basis.</i>

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

Jennifer Bennerotte, Communications and Technology Services Director

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

The City of Edina is comprised of a large percentage of single family residential. The other land uses include industrial, commercial, multi-family residential, and parks. The priority of the education program has been mainly centered on issues associated with single family residential. The City sends educational information using the following:

- About Town newsletter
- Announcements made in the City Extra email notification system
- Announcements made using social media
- Use "Hometown Hereos" to help celebrate people who take pride in the community
- Video message either posted on-line or aired on the cable access channel
- Website
- Newcomer packet
- Public Works Pipeline

When events are being held in the City the by Minnehaha Creek Watershed District or Nine Mile Creek Watershed District the City either partners or sponsors those events.

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

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

Established BMP categories	Measurable goals and timeframes
<i>Annual Public Meeting</i>	<i>The City will host an annual public meeting and record the</i>

	<i>number of attendees at the public meeting, all comments received, and responses to each comment in the record of decision. The effectiveness of this BMP will be measured by the number of residents who attend the annual public meeting.</i>
<i>Comply with Public Notice Requirements</i>	<i>The City will submit a public meeting notice to the local newspaper. This goal will be met by publishing the public meeting notice at least 30 days in advance of the meeting date.</i>
<i>Solicit Public Input</i>	<i>The City will conduct a public meeting and host a website on the City's Stormwater Pollution Prevention Program. The goal of this BMP will be met by hosting and recording all public comments received (if any) at the public meeting.</i>
<i>Consider Public Input</i>	<i>The City will conduct a public meeting and host a website on the City's Storm Water Pollution Prevention Program. City staff will respond to all public comments and statements received from the public meeting, and document any proposed changes to the SWPPP for final approval by City Engineer (if applicable). The goal of this BMP will be met by documenting all written and oral input.</i>

<i>BMP categories to be implemented</i>	<i>Measurable goals and timeframes</i>
<i>Coordination meeting</i>	<i>The City will annually hold a coordination meeting involving the Minnehaha Creek Watershed District and Nile Mile Creek Watershed. If a formal agreement is established with the watersheds the meeting would include discussing assistance with educational activities, erosion control, post-construction stormwater management, and TMDL implementation.</i>
<i>SWPPP Information Available at Annual Festival</i>	<i>Make the SWPPP and other important stormwater resources available at an annually held City event. People will be able to provide comments. This may take place of the annual public meeting.</i>

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

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

B.3. The City will develop written procedures for receiving, documenting and storing citizen input as described in the permit (Part III.C.2.b). Procedures will be in place within 12 months following the date permit coverage is extended

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

Laura Adler, Water Resources Coordinator

C. MCM 3: Illicit discharge detection and elimination

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

The City has a nuisance ordinance that prohibits the pollution of public water. City Staff and public works employees are trained to look for any signs of an illicit discharge while on the job and during their system inspections. The City is also aware of the necessary action in the event of a spill and the need to contact the Minnesota Duty Officer. ERPs will be developed to guide the actions the City will take to respond to an illicit discharge.

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

- a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.)Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). Yes No
- b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. Yes No
- c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. Yes No
- d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating Yes No

land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge.

- e. Procedures for the timely response to known, suspected, and reported illicit discharges. Yes No
- f. Procedures for investigating, locating, and eliminating the source of illicit discharges. Yes No
- g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. Yes No
- h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). Yes No

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

C.2.c to C.2.h: The City will formalize the current practices to develop Standard Operating Procedures (SOPs) for Illicit Discharge Detection and Elimination. The City currently incorporates illicit discharge inspections into the the evaluation of the City's stormwater conveyance system including:

- Structural stormwater BMPs
- Ponds
- Outfalls
- Facility investigations

The SOPs will include procedures for identifying priority ares, tracking illicit discharge, responding in a timely fashion, eliminating illicit discharge if they are detected, and using City of Edina's ERPs. Training will be provided to all staff that may be responsible for identifying illicit discharges. The training will be a part of ongoing stormwater training with City staff. Procedures will be in place within 12 months following the date permit coverage is extended.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
<i>Storm Sewer System Map</i>	<i>The City will review and update storm sewer map annually. Updates made will be the result of City projects and development/redevelopment.</i>
<i>Regulatory Control Program</i>	<i>The City will review existing ordinances and, if necessary, develop a city ordinance related to illicit and non-stormwater discharges into the City's storm sewer and surface/ground waters. The goal of this BMP will be met by reviewing existing city ordinances and implementing a specific ordinance related to illicit/non-stormwater discharges (if necessary).</i>
<i>IDDE Plan</i>	<i>The City will develop and implement a program to detect and reduce non-stormwater discharges, including illegal dumping. Procedures for detection may consist of visual inspections for non-stormwater discharges on City owned land and private property (as requested). Inspection frequency may be conducted concurrent with the outfall inspections and be included as a part of routine activities.</i>
<i>Public and Employee Illicit Discharge Information Program</i>	<i>The City or its designee will discourage illegal dumping by educating the public (City residents, businesses, and staff) on its potential sources and effects as well as alternative uses for unwanted materials. This BMP includes providing information on recycling options, services, and programs within the City such as drop-off sites for household hazardous waste. The City will also review the current educational activities undertaken by its staff to identify, prevent, and reduce illicit discharges from daily public works activities and other general City operations.</i>

	<p>The City has identified and evaluated the following categories of non-stormwater discharges (as defined in Part V.G.3.e): <i>Water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration, uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetland, de-chlorinated swimming pool discharges, and street wash water, discharges or flows from fire fighting activities.</i></p> <p>The City has determined the above referenced sources of non-stormwater discharge to be insignificant pollutant contributors to the MS4 system.</p>
<i>Identification of Non Stormwater Discharges and Flows</i>	

BMP categories to be implemented	Measurable goals and timeframes
<i>Inspections</i>	<i>Annually inspect locations identified as high-priority outfalls around high-risk establishments (industrial facilities, fast food restaurants, car washes, historical issues, and vehicle repair shops)</i>
<i>Illicit Discharge Investigation</i>	<i>If illicit connections are suspected televise sewer system, collect grab samples, or perform other effective testing procedures to find illicit connections in the system.</i>
<i>Community Reporting Options and Documentation Procedures</i>	<i>The City will evaluate the need to develop a link on the City website where all complaints can be logged.</i>

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? Yes No
- If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:
- C.4., The City will develop written procedures for receiving, documenting and storing citizen input as described in the permit (Part III.D.3.h). The procedure may include incorporating a link on the website and will include a record of all complaints received and follow-up activity that was performed. Procedures will be in place within 12 months following the date permit coverage is extended.*
5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:
- Laura Adler, Water Resources Coordinator*

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:
- The City requires review of construction site erosion and sediment control (ESC) plans before projects begin, and works with contractors to ensure appropriate and correct use of erosion and sediment control BMPs is being implemented on site. The building inspection department is primarily responsible for checking compliance with construction site ESC plans.*
2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? Yes No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? Yes No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? Yes No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? Yes No
 - 2) Does your program identify a frequency at which you will conduct construction site Yes No

inspections?

- 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? Yes No
- 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? Yes No
- e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? Yes No
- f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? Yes No
- g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? Yes No

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

D.2.c., The City will develop written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public as described in the Permit (Part III.D.4.c). Procedures will be in place within 12 months following the date permit coverage is extended.

D.2.d., City will develop written procedures for conducting site ESC inspections as described in the Permit (Part III.D.4.d). The written procedures will also define the roles that the City and the watersheds will play in ESC site inspections as may be established in the partnerships between the City and the watersheds. Procedures will be in place within 12 months following the date permit coverage is extended.

D.2.g., City will develop written procedures for retaining documents of site ESC inspections as described in the Permit (Part III.D.4.d). The written procedures will also define the roles that the City and the watersheds will play in documenting construction site inspections as may be established in the partnerships between the City and the watersheds. Procedures will be in place within 12 months following the date permit coverage is extended.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

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

Established BMP categories	Measurable goals and timeframes
<i>Ordinance or other Regulatory Mechanism</i>	<i>The City will review the current permit stipulations/city codes relating to project specific site erosion and sediment control as part of the conditions of the permit. Staff will review current ordinances and City codes and update as necessary.</i>
<i>Construction Site Implementation of Erosion and Sediment Control BMPs</i>	<i>Construction site operators must conform to NPDES Phase II permit requirements and local city requirements for construction site erosion control on sites 1 acre or larger. As part of the City's permit approval standards, erosion control BMPs must be implemented in accordance with the NPDES permit requirements, grading permit stipulations, and applicable city codes.</i>
<i>Waste Controls for Construction Site Operators</i>	<i>Construction site operators must confirm to NPDES Phase II permit requirements and the City's requirements for proper waste and material disposal, as defined in City codes, section 830. All waste and unused building materials must be properly disposed of off-site and prevented from being carried by runoff into a receiving channel or storm sewer system.</i>
<i>Procedures for Site Plan Review</i>	<i>Every applicant for a city building permit, subdivision approval, or grading permit that disturbs one acre or more is required to submit a project specific stormwater management plan (if applicable) and/or erosion control plan to the City for review and approval. Construction permits are also required to meet MPCA NPDES Phase II guidelines for erosion and sediment control and all applicable City ordinances and codes.</i>
<i>Procedures for Receiving Complaints</i>	<i>The City will provide a phone line and website links for the public to report potential construction site erosion control and waste disposal infractions.</i>
<i>Site Inspection and Enforcement</i>	<i>The City will provide training to its staff on proper erosion control, identification of problem areas, and the expectations of the Stormwater Pollution Prevention Plan (SWPPP) for</i>

construction site operations.

BMP categories to be implemented

Measurable goals and timeframes

Prioritize Inspections

The City will develop a process to determine the frequency for inspecting high priority inspection sites (e.g., near sensitive receiving waters, projects larger than 5 acres).

Documentation Procedures

Develop written procedures to track and archive all plan review and inspection documents within 12 months following the date permit coverage is extended.

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

*Engineering Department for Review and Support
Cindy Larson, Residential Redevelopment Coordinator
Steve Kirchman, Chief Building Official*

E. MCM 5: Post-construction stormwater management

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

The City reviews sites for post-construction stormwater management primarily to evaluate how private systems are connecting into the public system and ensuring that BMPs designed to manage stormwater are being constructed properly. For large sites typically 3 reviews are required by the City. As stated in the City of Edina's approved Comprehensive Water Resources Management Plan Section 3.2.2, policies 6 & 7 states "Section 3.2.2, policies 6 & 7 of the plan adopts the Minnehaha Creek Watershed District and Nine Mile Creek Watershed District's rules by reference". The watersheds have a detailed review process and stormwater rules that require volume control, water quality, and water quantity.

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

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

E.3.b-d., The City will develop written procedures for documentation of post-construction stormwater management for documentation of mitigation projects, payments, and legal mechanisms as described in the Permit (Part III.D.5.c.). Procedures will be in place within 12 months following the date permit coverage is extended.

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

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

Established BMP categories

Measurable goals and timeframes

Encourage the use of structural and non-structural BMPs

*Structural
The City will review and revise (if necessary, during the plan review process) permanent BMP designs and criteria for post-construction stormwater management associated with new development and redevelopment projects of one acre or more. The City will also consider the implementation of low impact*

	<p>development practices if prudent and feasible. The City will annually review and revise (if necessary) the current policies, requirements, and Best Management Practices specific to structural BMP's.</p> <p><u>Non-Structural</u> The City may also improve the condition of parks, wetlands, and watersheds when the opportunity arises. Wetland restorations, native plantings, bank stabilization, detention ponds, and other best management construction projects will continue to be actively pursued by the City when the opportunity arises.</p>
<u>Post-Construction Regulatory Mechanism</u>	<p>The City will implement the requirements of the Comprehensive Water Resource Management Plan (CWRMP), along with applicable City ordinances to minimize the negative impacts stormwater runoff may have on water quality within the City.</p> <p>The City will revise this BMP to include establishing a partnership with the Nine Mile Creek Watershed District and Minnehaha Creek Watershed District for reviewing and permitting of projects 1 acre or greater to require post-construction stormwater management. These post-construction stormwater requirements will include the provisions of the MS4 permit.</p>
<u>Long Term Operation and Maintenance of BMPs</u>	<p>City staff will inspect post-construction BMP's then evaluate inspection records for determining the corrective maintenance actions (if necessary) for the long-term operation of all stormwater management facilities owned by the City. Corrective actions and routine maintenance of all stormwater management facilities will be guided by the Comprehensive Water Resource Management Plan, City of Edina's standard specifications and design requirements, and City staff.</p> <p>This will BMP will be revised for the new permit term to include requirements for the long-term operation and maintenance of structural pollution control devices constructed as a part of private systems.</p>
BMP categories to be implemented	Measurable goals and timeframes
<u>Revise Written Procedures for Site Plan Review</u>	<p>Within 12 months of extension of permit coverage, the City will revise the existing site plan review procedures. These procedures may include a site plan review checklist, and form letter, etc.</p>
<u>Permit Tracking System</u>	<p>Within 12 month of extension of permit coverage the City will update their tracking system to include information to assist with tracking construction site inspections, agreements, complaints, and correspondence for reports of non-compliance.</p>
<u>BMP Guidance Document</u>	<p>Develop BMP Construction Guidance document for developers and contractors within 12 months of permit coverage extension.</p>

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

Laura Adler, Water Resources Coordinator

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

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

The City currently inspects its structural pollution control devices on an annual basis and inspects all of its outfalls, sediment basins and ponds every 5 years. Inspection information is entered into "City Works" their asset management program and is rated 1-4 to assist with prioritizing maintenance. The City inspects stockpiles, storage and material

handling areas at the maintenance yard for potential discharges and maintenance of BMPs as a part of their routine activities. The City is evaluating ways to reduce the use of road salt for winter road maintenance activities to reduce chlorides entering water resources and the City sweeps their streets twice annually (Spring and Fall).

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? Yes No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:
4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
<i>Municipal Operations, Maintenance, and Training Program</i>	<p><i>The City will implement the Stormwater Management and Maintenance programs identified within the City's Comprehensive Water Resources Management Plan (CWRMP) and as specified in the City's SWPPP.</i></p> <p><i>The City will also provide training materials and workshops to City staff to help reduce stormwater pollution caused from park maintenance, fleet and building maintenance, new construction and land disturbances, outfall inspections, and storm sewer system maintenance.</i></p>
<i>Street Sweeping</i>	<p><i>The City will brush or vacuum sweep streets a minimum of twice annually in an effort to reduce the amount of sediment, trash and organic material from reaching the storm sewer system and water resources.</i></p>
<i>Annual Inspection of All Structural Pollution Control Devices</i>	<p><i>The City Public Works Department will inspect all identified structural pollution control devices on City property and prescribe a maintenance schedule as necessary. Newly constructed and rebuilt structural pollution control devices will be added to the storm sewer map.</i></p> <p><i>This BMP will be revised to identify that inspections need to be completed at least annually unless a different schedule is justified based on maintenance needs.</i></p>
<i>Inspection of Outfalls and Sediment Basins/Ponds</i>	<p><i>The City will inspect all mapped outfalls, sediment basins and ponds within the City's storm sewer system. The results of these inspections will be compiled in a report which will include sediment levels, watershed information and recommended maintenance and maintenance schedules.</i></p>
<i>Annual Inspection of All Exposed Stockpile, Storage and Material Handling Areas</i>	<p><i>City staff will annually locate and inspect all exposed stockpiles and storage/material handling areas located on City owned properties. All existing onsite BMP's will be inspected for conformance to NPDES Phase II permit requirements. Any identified erosion control issues will be corrected and documented per NPDES Phase II standards.</i></p> <p><i>This BMP will be updated to increase the inspection frequency to at least quarterly.</i></p>
<i>System Maintenance</i>	<p><i>The City will determine whether repair, replacement, or maintenance measures are necessary from evaluating inspection reports and other pertinent information. All corrective maintenance, repair, and/or replacement measures will be documented and recorded by the City's public works staff.</i></p>

	<i>This BMP will be revised to incorporate the City's current system for prioritizing maintenance.</i>
<i>Documentation Procedures</i>	<i>The Public Works Director will retain all records of inspection, maintenance, and corrective actions of the City's storm water system. Records will be available, by request, to the public upon approval by the Public Works Director.</i>
<i>Evaluation of Inspection Frequency</i>	<i>The City will retain records of inspection results and any maintenance performed or recommended. After 2 years of inspections, if patterns of maintenance become apparent, the frequency of inspections may be adjusted at the discretion of the Public Works Director given the following conditions are fulfilled: 1. If maintenance or sediment removal is required as a result of each of the first two annual inspections, the frequency of inspection shall be increased to at least two (2) times annually or more frequently as needed to prevent carry-over or washout of pollutants from structures and maximize pollutant removal. If maintenance or sediment removal is not required as a result of both of the first two (2) annual inspections, the frequency may be reduced to once every two (2) years.</i>
<i>Landscaping and Lawn Care Practices Review</i>	<i>The City will annually review and, if necessary, adjust its current practices in the use of fertilizer, pesticide and herbicide application, mowing and discharge operations, grass clipping collection, mulching and composting.</i>
<i>Road Salt Application Review</i>	<i>The City will review the practices and policies of road salt applications such as alternative products, calibration of equipment, inspection of vehicles and staff training.</i>
<i>Backwash Recycle Tanks</i>	<i>The City constructed backwash recycle tanks at water treatment plants #2, #3, and #4. Backwash water recycle tanks will collect the backwash water, which now flows to the storm water system. The backwash water will stay in the tanks until the suspended solids settle out, then will be retreated and put into the potable water supply. The settled solids will be discharged to the sanitary sewer system. Each plant will have an emergency overflow point in the recycling tanks, which will enter the same storm sewer system to which each plant currently discharges. The overflow points will be locked controlled discharges.</i>
BMP categories to be implemented	Measurable goals and timeframes
<i>Develop Spill Prevention & Control Plans for Municipal Facilities</i>	<i>Develop plans describing spill prevention and control procedures by the end of Year 1. Conduct annual spill prevention and response training sessions to all municipal employees. Distribute education materials, i.e. posters and pamphlets, to each municipal facility by the end of year 2.</i>
<i>Facility Inventory</i>	<i>The City has created a map of all identified facilities and along with BMPs being used to control pollutants. Where BMPs are not in place identify BMPs that could be implemented along with a schedule for implementation.</i>
<i>Pond Assessment Procedures & Schedule</i>	<i>In year 1, develop procedures for determining TSS and TP treatment effectiveness of city owned ponds used for treatment of stormwater. Implement schedule in year 2-5.</i>

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? Yes No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? Yes No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Yes No

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

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

F.5.b.2): The City of Edina does not have any known surface water intakes.

F.6.: The City completed a non-degradation evaluation during the previous permit in 2007. The City will use this information to develop a procedure for assessing ponds to determine TSS and TP effectiveness as described in the Permit (Part III.D.6.d). A schedule will be implemented in years 2 thru 5.

F.7.: The City will develop written procedures for inspection of structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas as described in the Permit (Part III.D.6.f.). Procedures will be in place within 12 months following the date permit coverage is extended.

F.8.: The City will develop and implement a stormwater management training program to commensurate with each employees job duties as described in the Permit (Part III.D.6.g.). Procedures will be in place within 12 months following the date permit coverage is extended.

F.9: The City will develop written procedures to document inspections, mainenance, and training as described in the Permit (Part III.D.6.h.). Procedures will be in place within 12 months following the date permit coverage is extended.

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

Brian Olson, Public Works Director

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

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

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

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

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

convention: *MS4NameHere_TreatmentSystem*.

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

VIII. Add any Additional Comments to Describe Your Program