



City of Eden Prairie, MN

EP SWPPP 2021-26 FINAL

November 16, 2020 To December 31, 2026

This program consists of the following 25 Minimum Control Measure(s).

- 9. Permit Application Requirements
- 16. Public Education and Outreach
- 17. Public Participation / Involvement
- 18. Illicit Discharge Detection and Elimination
- 19. Construction Site Runoff Control
- 20. Post-Construction Runoff Management
- 21. Pollution Prevention / Good Housekeeping
- 22. TMDLs: Discharge to Impaired Waters
- 25. Annual SWPPP Assessment Reporting

9 Permit Application Requirements

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description:

Permit applications are required for new applicants as well as existing permittees, along with other items specified in the MS4 general permit, as follows (with reference to permit sections):

9.1 Application for Reissuance:

If an existing permittee desires to continue permit coverage beyond the expiration date, the permittee must submit an application for permit reissuance: Due by 180 days prior to permit expiration. [Minn. R. 7001.0040, Subp. 3]

11.1 - 11.2 Existing Permittee Applicants:

All existing permittees seeking to continue discharging stormwater associated with a small MS4 after the issuance date of the General Permit must submit Part 2 of the permit application: Due by 150 days after permit issuance. Existing permittees were required to submit Part 1 of the permit application prior to the expiration date (July 31, 2018) of the Agency's small MS4 general permit No.MNR040000, effective August 1, 2013.

12.1 - 12.2 Stormwater Pollution Prevention Program (SWPPP) Document:

All applicants must submit a SWPPP Document (i.e., Part 2 of the permit application) when seeking coverage under the General Permit. The SWPPP Document will become an enforceable part of the General Permit upon approval by the Agency. Modifications to the SWPPP Document that are required or allowed by the General Permit (see Section 24) will also become enforceable provisions. The applicant must submit the SWPPP Document on a form provided by the Agency. The applicant's SWPPP Document must include items 12.3 through 12.11, as applicable.

13.1 - 13.2 Stormwater Pollution Prevention Program (SWPPP):

The permittee must develop, implement, and enforce a SWPPP designed to reduce the discharge of pollutants from the small MS4 to the Maximum Extent Practicable (MEP) and to protect water quality. Existing permittees regulated within the urbanized area as defined by the United States Census Bureau, the applicable urbanized area for which the permittee must develop, implement, and enforce a SWPPP can be based on the most recent decennial census of 2010 for the duration of the General Permit.

14.1 - 14.2 Mapping:

New permittees must develop, and existing permittees must update, as necessary, a storm sewer system map that depicts the following:

- a. the permittee's entire MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes;
- b. outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinates;
- c. structural stormwater BMPs that are part of the permittee's MS4; and
- d. all receiving waters.

Best Management Practices

9.1 Permit Application Documents

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

9.1 Application for Reissuance.

9.2 If an existing permittee desires to continue permit coverage beyond the expiration date, the permittee must submit an application for permit reissuance: Due by 180 days prior to permit expiration. [Minn. R. 7001.0040, Subp. 3]

11.1 Existing Permittee Applicants.

11.2 All existing permittees seeking to continue discharging stormwater associated with a small MS4 after the issuance date of the General Permit must submit Part 2 of the permit application: Due by 150 days after permit issuance. Existing permittees were required to submit Part 1 of the permit application prior to the expiration date (July 31, 2018) of the Agency's small MS4 general permit No.MNR040000, effective August 1, 2013.

Specific Components and Notes

Application & SWPPP appear to be used interchangeably in the permit now.

Goals

9.1.1 Permit Application

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide a copy of the permit application documents as required in Permit Articles 9.1 through 11.2, as appropriate.

Planned: 2021

Complete: 2021

Activity Date	Name	Description
None		

9.2 SWPPP Document

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

In accordance with Article 12.1-12.2, all applicants must submit a Stormwater Pollution Prevention Plan (SWPPP) Document when seeking coverage under the General Permit. Specific requirements for the SWPPP document are stated in Permit Articles 12.1 - 12.11. The SWPPP document submittal is required by April 15, 2021.

Goals

9.2.1 SWPPP Document

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide a copy of the SWPPP Document submitted to the MPCA in accordance with permit requirements stated in Articles 12.1-12.11. The SWPPP document submittal is required in accordance with the schedule stated in the permit for existing permittees or new applicants.

Planned: 2021

Complete: 2021

Activity Date	Name	Description
04/15/2021	SWPPP Document	Attached is a copy of the SWPPP Document

16 Public Education and Outreach

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description:

To satisfy this minimum control measure, the operator of a regulated small MS4 needs to:

1. Implement a public education program to distribute educational materials to the community, or conduct equivalent outreach activities about the impacts of storm water discharges on local waterbodies and the steps that can be taken to reduce storm water pollution; and
2. Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

Best Management Practices

16.2 Programming Schedule

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

- Revise and implement current Public Education & Outreach program as needed.
- Continue to implement a public education program to distribute educational materials or equivalent outreach that informs the public of the impact stormwater discharges have on waterbodies.
- Include actions citizens, businesses and other local organizations can take to reduce the discharge of pollutants to stormwater.

Justification

A schedule of proposed activities is suggested to track this information.

Education Program / Public Outreach

16.1

Annual Reporting Items

Annual tracking as needed.

Goals

16.2.1 Public Education Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
12/31/2022	2022 Education Activities	
12/31/2023	2023 Education Plan	

16.3 High Priority Topic Selection

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

16.3

Distribute educational materials or equivalent outreach focused on at least two (2) specifically selected stormwater-related issues of high priority (e.g., specific TMDL reduction targets, changing local business practices, promoting adoption of residential BMPs, lake improvements through lake associations, household chemicals, yard waste, etc.).

The topics must be different from those described in items 16.4 through 16.6. (IDDE, deicing salt use, pet waste)

Goals

16.3.1 Yard Waste Management

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Yard waste management was selected as one of the high priority items for this permit term. The City has opened a new yard waste collection site that will be used to promote proper disposal of yard waste through open collection of materials during spring, summer and fall as well as special collection events at this location during the year. These events will be publicized through the Life in the Prairie newsletter, City-wide and Sustainable Eden Prairie e-mail news and during live events or workshops.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
09/30/2021	Life in the Prairie 2021	
04/28/2022	Facebook 20220428	Facebook post promoting the Yard Waste Drop-Off Site
05/12/2022	Facebook 20220512	Facebook post promoting yard waste site after storm.
07/20/2022	Sustainable Eden Prairie News	Dispose of yard waste properly for water's sake Pollutants or nutrients entering a pond through stormwater runoff can lead to harmful algae blooms (HABs), excess plant growth or even harm to wildlife. Learn about protecting stormwater ponds by safely disposing of yard waste.
09/12/2023	Life in the Prairie Fall 2023	

16.3.2 Adoption of Residential BMPs

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

The City will develop a program to work with residents on ways they can reduce the addition of pollutants to stormwater runoff. This will include flyers for distribution during events such as the City Open House, periodic e-mail newsletters, social media postings, our landscaping for water quality rebate program, etc.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
04/01/2021	Trees and Stormwater 2021	The City is working on implementing a program to purchase and install trees to help mitigation stormwater runoff rate and provide water quality benefits. A flyer and poster were developed to hand out at public events. The first event this was used at was Arbor Day during our tree sale in April 2021.
06/21/2022	Facebook 20220621	Facebook post about water conservation and Landscaping for Water Quality rebates.
07/20/2022	Sustainable Eden Prairie News 2022	Landscape with water quality in mind What we do on land affects our lakes, creeks and rivers. If you're considering a shoreline buffer, rain garden or pollinator garden designed and constructed to treat stormwater runoff, learn about the City's landscaping rebates. Consider the pollinators A flowering lawn differs from a traditional lawn by including flowering plants as well as turfgrasses. In addition to providing much-needed food resources for bees and other beneficial pollinators, the benefits of a flowering lawn include increased lawn resilience to environmental pressures and the beauty of the flowers themselves. The University of Minnesota Extension offers practical tips about planting and maintaining a bee lawn.
03/20/2023	Life in the Prairie Spring 2023	

16.4 IDDE Recognition & Reporting

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

16.4

At least once each calendar year, distribute educational materials or equivalent outreach focused on illicit discharge recognition and reporting illicit discharges to the permittee.

Specific Components and Notes

The City plans to focus on the use of an application called "See-Click-Fix". This can provide better accuracy for reporting point source issues.

Goals

16.4.1 16.4 IDDE Outreach

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Distribute educational materials or complete an equivalent outreach effort at least once each calendar year focused on providing education on illicit discharge recognition and reporting illicit discharges.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete: 2020 2021

Activity Date	Name	Description
04/30/2021	Life in the Prairie Spring 2021	
06/06/2022	Facebook 20220606	Facebook post regarding Hennepin County drop-off sites with picture of paint cans.
07/27/2022	Storm Drain Volunteer Web Page Update 2022	Updated storm drain volunteer web page.

16.5 Salt Usage and Impact

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

16.5 For cities and townships, at least once each calendar year, the permittee must distribute educational materials or equivalent outreach to residents, businesses, commercial facilities, and institutions, focused on the following:

- a. impacts of deicing salt use on receiving waters;
- b. methods to reduce deicing salt use; and
- c. proper storage of salt or other deicing materials.

Goals

16.5.1 Deicing Salt Use

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Distribute educational materials or equivalent outreach annually to residents, businesses, commercial facilities, and institutions, focused on the following:

- a. impacts of deicing salt use on receiving waters;
- b. methods to reduce deicing salt use; and
- c. proper storage of salt or other deicing materials.

Provide the following information to document each annual (at least) outreach effort:

1. Description of target audience
2. Primary focus of educational effort (salt impact, reduction, and/ or storage)
3. Nature of the activity or outreach effort
4. Date(s) of the activity or effort
5. Quantities and descriptions of educational materials distributed
6. Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.)
7. Upload a copy of the deicing salt management educational materials delivered through this activity for future reference

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
12/31/2021	Life in the Prairie Winter 2021	
01/26/2022	Facebook 20220126	Facebook post with link to NMCWD post about effects of road salt on water
12/09/2022	Salt 12/2022	A brief article about reducing salt application appeared in the Eden Prairie News email blast and on the City website. The same text appeared in Life in the Prairie newsletter, which is delivered by US Mail.
10/05/2023	Mitchell Lake Association Meeting 2023	

16.5.2 Water Softeners

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide information to residents regarding the water softening process used for our drinking water system and the need for water softeners in the home by making a flyer available.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
04/13/2021	Water Softener Flyer	Developed a flyer on Water Softeners to use at City events and at City Hall and the Water Treatment Plant. In 2021 the flyer was used at the Arbor Day Event, which was also our Annual Meeting Event, in April and at the City-wide Open House in October.

16.6 Pet Waste Management

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

16.6 For cities and townships, at least once each calendar year, the permittee must distribute educational materials or equivalent outreach focused on pet waste. The educational materials or equivalent outreach must include information on the following:

- impacts of pet waste on receiving waters;
- proper management of pet waste; and
- any existing permittee regulatory mechanism(s) for pet waste.

[Minn. R. 7090]

Goals

16.6.1 Pet Waste Management

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Distribute educational materials or equivalent outreach annually focused on pet waste. The educational materials or equivalent outreach must include information on the following:

- impacts of pet waste on receiving waters;
- proper management of pet waste; and
- any existing permittee regulatory mechanism(s) for pet waste.

Provide the following information to document each annual (at least) outreach effort:

- Description of target audience
- Primary focus of educational effort (pet waste impact, proper waste management, and/ or existing regulatory mechanisms)
- Nature of the activity or outreach effort
- Date(s) of the activity or effort
- Quantities and descriptions of educational materials distributed
- Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.)
- Upload a copy of the pet waste management educational materials delivered through this activity for future reference

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
03/15/2021	Pet Waste Article 2021	Prepared an article on pet waste management for the City's Life in the Spring 2021 Prairie newsletter.
10/08/2021	Pet Waste Flyer 2021	Updated existing Pet Waste Flyer to add a QR code and allow it to be used as a poster as well as a handout. Updated information to meet new permit requirements.
05/19/2022	Facebook 20220519	Facebook post reminding residents about leash rules and picking up pet waste.

05/26/2022	Facebook 20220526	"Leave No Poop Behind" post on Facebook. Very well received!
04/24/2023	Facebook 20230424	Facebook post "Leave No Poop Behind"

16.7 Educational and Outreach Plan

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

16.7 The permittee must develop and implement an education and outreach plan that consists of the following:

- a. target audience(s) (e.g., residents, businesses, commercial facilities, institutions, and local organizations; consideration should be given to low-income residents, people of color, and non-native English-speaking residents. A resource to help identify these areas is available on the Agency's environmental justice website);
- b. name or position title of responsible person(s) for overall plan implementation;
- c. specific activities and schedules to reach each target audience; and
- d. a description of any coordination with and/or use of stormwater education and outreach programs implemented by other entities, if applicable.

Goals

16.7.1 Educational and Outreach Plan

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop an education and outreach plan that consists of:

- a. Target audience(s)
- b. Name or position title of responsible person(s) for overall plan implementation
- c. Specific activities and schedules to reach each target audience
- d. A description of any coordination with and/or us of stormwater education and outreach programs implemented by other entities, where applicable.

Provide a copy or link to the current Education and Outreach Plan and describe any updates or changes completed in the reporting period. *(OR report individual components separately with measurable goals 2-5.)*

Planned: 2022 2023

Complete: 2022 2023

Activity Date	Name	Description
01/01/2022	2022 Education and Outreach Plan	Education and Outreach Plan for 2022
01/01/2023	2023 Adaptive Education and Outreach Plan	

16.7.2 Identify Target Audiences and Topics

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Identify specific target audiences and respective topics for stormwater education within the MS4, including specific stormwater-related issues and measurable goals for each audience.

Provide the following information to document completion of this activity each reporting period:

1. Describe each identified target audience
2. State specific stormwater related issue(s) for each target audience
3. Identify measurable goals for education and outreach efforts for each target audience

Planned: 2022 2023

Complete: 2022 2023

Activity Date	Name	Description
12/31/2022	Target Audiences 2022	General public; pet owners; historically underrepresented communities; municipal employees: all, winter maintenance, construction inspection, post-construction inspectors.
12/31/2023	Target Audiences 2023	General public; pet owners; historically underrepresented communities; K-12 teachers and students and their families; municipal employees: all, winter maintenance, construction inspection, post-construction inspectors.

16.7.3 Responsible Person in Charge

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Identify the person in charge of overall plan implementation.

Confirm or update identification of the person in charge of the MS4s overall plan implementation each reporting period.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete: 2020 2021 2022 2023

Activity Date	Name	Description
12/31/2020	Responsible Person 2020	Leslie Stovring
12/31/2021	Responsible Person 2021	Leslie Stovring
12/31/2022	Responsible Person 2022	Lori Haak
01/01/2023	Responsible Person 2023	Lori Haak

16.7.4 Education/ Outreach Activities

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide a list of specific activities and schedules to reach each target audience with their respective stormwater education topic(s). Describe the topic(s), activity type, and supporting educational materials and activity or outreach effort schedule.

Planned: 2022 2023

Complete: 2022

Activity Date	Name	Description
12/30/2022	2022 Education and Outreach Matrix	A matrix that outlines the schedule of education and outreach activities by permit item.

16.8 Public Education and Outreach Activities

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

16.8 The permittee must document the following information:

- a. a description of all specific stormwater-related issues identified by the permittee in item 16.3;
- b. all information required under the permittee's education and outreach plan in item 16.7;
- c. activities held, including dates, to reach each target audience;
- d. quantities and descriptions of educational materials distributed, including dates distributed; and
- e. estimated audience (e.g., number of participants, viewers, readers, listeners, etc.) for each completed education and outreach activity. [Minn. R. 7090]

Goals

16.8.2 Stormwater Education Website

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop and maintain relevant stormwater education information on the MS4's public website, including information on general stormwater management topics and information specific to stormwater management issues within the MS4.

Provide a short description of information published on the website as described above through each reporting period and a link to the current website URL.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
12/30/2022	2022	This is the link to the main page: https://www.edenprairie.org/community/sustainable-eden-prairie/water/stormwater . More resources exist in other places.
12/29/2023	2023	This is the link to the main page: https://www.edenprairie.org/community/sustainable-eden-prairie/water/stormwater-and-runoff . More resources exist in other places.

16.8.3 Distribute Educational Materials at Public Facilities

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide access to stormwater educational materials prepared in accordance with the SWPPP for public access at public facilities within the MS4.

Document activity to support this measurable goal with an uploaded copy or stated description of each distributed item, the locations where the materials are made available and the quantity of printed materials provided at each location through the reporting period.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022

Activity Date	Name	Description
12/31/2023	Materials at Engineering Counter	Had flyers about yard waste, smart salting and residential BMPs available at the Engineering counter at City Center throughout 2022-2023.

16.8.4 Distribute Educational Materials at Community Events

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Distribute educational materials at community events or activities within the MS4.

Identify the community event, target audience and respective topic(s), date(s) of activity, copy or description and quantity of distributed material for each event through the reporting period.

Planned: 2020 2021 2022 2023

Complete: 2020 2021 2022

Activity Date	Name	Description
08/25/2022	Minnesota State Fair 2022	As part of WaterShed partners, staffed the Adopt A Drain booth at the Minnesota State Fair. Spoke with the public about nonpoint source pollution and facilitated signing up to adopt drains. Handed out pencils with AAD logo and website.
09/29/2022	GIVE Gathering Resource & Volunteer Fair 2022	Spoke with 20 interested individuals/families about the Adopt-A-Drain and Storm Drain Marking volunteer programs. Used CGEE's tabletop AAD display. Handed out attached flyer.
03/11/2023	Everything Spring Expo 2023	Brought Adopt A Drain tabletop display, poop bags and bobbers to Expo. Spoke with approximately 75 attendees about drain adopting opportunities and answered questions about water resources in EP.

16.8.5 Newsletter Articles

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide seasonally relevant stormwater education information in newsletter format for periodic publication.

Identify the target audience and respective topic; provide a copy of each article published in the MS4's newsletter or other printed publication, including the date of publication and general distribution.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022

Activity Date	Name	Description
12/31/2021	Life in the Prairie Winter 2021	
06/01/2022	Summer 2022	
12/01/2022	Winter 2022	
03/01/2023	Spring 2022	
03/30/2023	Life in the Prairie Spring 2023	

16.8.6 Sustainable EP Emails

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide seasonally relevant email blasts to interested individuals through our Sustainable EP email list.

Identify the target audience(s) and respective topic(s); provide a copy of the email, the approximate number of recipients to document activity in support of this goal.

Planned: 2022 2023

Complete: 2022

Activity Date	Name	Description
07/20/2022	Summer 2022	
10/05/2022	Fall 2022	
12/16/2022	Winter 2022	

16.8.7 Stormwater Education Exhibits

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Host stormwater education exhibits at community events for opportunity to provide stormwater program information and to receive public feedback.

Document activity toward achieving this goal each reporting period with a description and date of the event, the target audience(s) and respective topic(s), a narrative summary of the information provided, an estimate of the number of public contacts made and identification or uploaded copy, including the quantity, of materials distributed.

Planned: 2022 2023 2024 2025 2026

Complete: 2022 2023

Activity Date	Name	Description
08/25/2022	Minnesota State Fair	As part of WaterShed partners, staffed the Adopt A Drain booth at the Minnesota State Fair. Spoke with the public about nonpoint source pollution and facilitated signing up to adopt drains. Took photos of people cleaning "storm drain" and explained benefits.
04/29/2023	Arbor Day 2023	Hosted tabletop Adopt a Drain display at City's Arbor Day event at Staring Lake Park.

16.8.8 Stormwater Education Public Presentations

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct presentations on stormwater education topics identified within the SWPPP for local organizations, including community groups, business groups, schools, non-profit organizations.

Identify each the target audience(s) and respective topics(s) of each presentation conducted through the reporting period as described above, including the date, name of the group or organization, topic presented, approximate number of participants in the discussion and any materials distributed. Include a copy of the presentation document when available.

Planned: 2022 2023 2024 2025

Complete: 2022 2023

Activity Date	Name	Description
10/06/2022	Mitchell Lake Association 2022	Presented the attached to the Mitchell Lake Association annual meeting at the Chanhassen American Legion.
10/11/2022	Sustainability Commission 2022	Presented the attached to EP Sustainability Commission.

16.8.8 Facebook, Instagram & Twitter

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Facebook, Instagram & Twitter posts

Planned: 2022 2023 2024 2025

Complete: 2022 2023

Activity Date	Name	Description
10/21/2022	Clean Storm Drains (Fall 2022)	This was posted on the City's Facebook, Instagram and Twitter.

16.8.8 Stormwater Education Public Presentations

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct presentations on stormwater education topics identified within the SWPPP for local organizations, including community groups, business groups, schools, non-profit organizations.

Identify each the target audience(s) and respective topics(s) of each presentation conducted through the reporting period as described above, including the date, name of the group or organization, topic presented, approximate number of participants in the discussion and any materials distributed. Include a copy of the presentation document when available.

Planned: 2022 2023 2024 2025

Complete: 2022 2023

Activity Date	Name	Description
04/12/2023	St. Andrew Lutheran Church 2023	Spoke with 9 high school students and their advisors about water resources in Eden Prairie, as well as the church's proximity to Purgatory Creek, nonpoint source pollution, and the Adopt A Drain Program.

16.8.8 Facebook, Instagram & Twitter

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Facebook, Instagram & Twitter posts

Planned: 2022 2023 2024 2025

Complete: 2022 2023

Activity Date	Name	Description
04/24/2023	Leave No Poop Behind (Spring 2023)	Social media post re. pet waste

16.8.8 Stormwater Education Public Presentations

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct presentations on stormwater education topics identified within the SWPPP for local organizations, including community groups, business groups, schools, non-profit organizations.

Identify each the target audience(s) and respective topics(s) of each presentation conducted through the reporting period as described above, including the date, name of the group or organization, topic presented, approximate number of participants in the discussion and any materials distributed. Include a copy of the presentation document when available.

Planned: 2022 2023 2024 2025

Complete: 2022 2023

Activity Date	Name	Description
08/01/2023	Pax Christi 2023	Presented about water conservation and protection to a summer camp of about 80 K-5th grade students in two 30-minute sessions. Outline attached.

16.9 Annual I & E Program Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

16.9 The permittee must conduct an annual assessment of the public education program to evaluate program compliance, the status of achieving the measurable requirements in Section 16 and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., education and outreach efforts, implementation of written plans, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Goals

16.9.1 Annual Education and Outreach Program Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct an annual assessment of the public education program to evaluate program compliance, the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

Planned: 2020 2021 2022 2023

Complete: 2020 2021 2022

Activity Date	Name	Description
01/13/2023	2022 Program Assessment	

16.9.2 Public Education and Outreach Program Modifications

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Identify modifications made to the public education program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

Planned: 2020 2021 2022 2023

Complete: 2020 2021 2022

Activity Date	Name	Description
01/13/2023	2022 Program Modifications	

17 Public Participation / Involvement

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description:

17.1 MCM 2: Public Participation/Involvement. [Minn. R. 7090]

17.2 New permittees must develop and implement, and existing permittees must revise their current program, as necessary, and continue to implement, a Public Participation/Involvement program to solicit public input on the SWPPP and involve the public in activities that improve or protect water quality. The permittee must incorporate Section 17 requirements into their program.

17.3 Each calendar year, the permittee must provide a minimum of one (1) opportunity for the public to provide input on the adequacy of the SWPPP. The permittee may conduct a public meeting(s) to satisfy this requirement, provided appropriate local public notice requirements are followed and the public is given the opportunity to review and comment on the SWPPP.

17.4 The permittee must provide access to the SWPPP Document, annual reports, and other documentation that supports or describes the SWPPP (e.g., regulatory mechanism(s), etc.) for public review, upon request. All public data requests are subject to the Minnesota Government Data Practices Act, Minn. Stat. 13. [Minn. Stat. 13]

17.5 The permittee must consider oral and written input regarding the SWPPP submitted by the public to the permittee.

17.6 Each calendar year, the permittee must provide a minimum of one (1) public involvement activity that includes a pollution prevention or water quality theme (e.g., rain barrel distribution event, rain garden workshop, cleanup event, storm drain stenciling, volunteer water quality monitoring, adopt a storm drain program, household hazardous waste collection day, etc.).

17.7 The permittee must document the following information:

- a. all relevant written input submitted by persons regarding the SWPPP;
- b. all responses from the permittee to written input received regarding the SWPPP, including any modifications made to the SWPPP as a result of the written input received;
- c. date(s), location(s), and estimated number of participants at events held for purposes of compliance with item 17.3;
- d. notices provided to the public of any events scheduled to meet item 17.3, including any electronic correspondence (e.g., website, e-mail distribution lists, notices, etc.); and
- e. date(s), location(s), description of activities, and estimated number of participants at events held for the purpose of compliance with item 17.6.

17.8 The permittee must conduct an annual assessment of the Public Participation/Involvement program to evaluate program compliance, the status of achieving the measurable requirements in Section 17 and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., public input and involvement opportunities, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Best Management Practices

17.2 Public Participation/ Involvement Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

(New Permittees) Develop and implement...(or)

(Existing permittees) Revise and continue to implement...

...the current Public Participation/ Involvement Program as necessary to meet current MS4 permit and SWPPP requirements to solicit public input on the SWPPP and to involve the public in activities that improve or protect water quality.

Goals

17.2.1 Public Participation/ Involvement Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Prepare or update, maintain and implement a Public Participation/ Involvement Program in compliance with the MS4 permit requirements (17.3-17.8).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022

Activity Date	Name	Description
12/31/2021	2021 Adopt A Drain	
12/30/2022	2022 Adopt A Drain	The City partners with Metro Watershed Partners to participate in the Adopt A Drain program (https://mn.adopt-a-drain.org/). The program allows individuals, groups and classrooms to sign up to inspect and clean storm drains throughout the city. Participants receive a welcome packet and regular email reminders to inspect their drains, cleaning them as necessary. Adoptions and cleanings are reported online and tracked by Hamline. In 2022, 25 new participants adopted 40 drains, for a total of 141 participants adopting 266 drains. Of those 141 participants, 53 reported cleanings totaling 45 volunteer hours. This resulted in over 522 pounds of debris being removed from adopted drains.

17.3 Receive SWPPP Input

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Each calendar year, the permittee must provide a minimum of one (1) opportunity for the public to provide input on the adequacy of the SWPPP. The permittee may conduct a public meeting(s) to satisfy this requirement, provided appropriate local public notice requirements are followed and the public is given the opportunity to review and comment on the SWPPP.

Specific Components and Notes

Even after providing published notice and several opportunities per year to solicit public comment on the SWPPP, we received none. Consequently, for 2023 and beyond, we will make sure to have the SWPPP Document online and keep that available year-round for public review and comment.

Goals

17.3.1 Annual Public Meeting Notice

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide notice to the public of any events scheduled to provide an opportunity for public to provide input on the adequacy of the SWPPP. Conform to local public notice requirements for all meetings and include all types of notice distribution (mail, email, web site posting, print or broadcast media and public postings).

Provide a copy or records of each type of notice published or distributed for each public meeting held as described each reporting period, including a description of the type and size of distribution audience.

Planned: 2021 2022

Complete: 2021 2022

Activity Date	Name	Description
04/08/2021	2021 Annual Meeting Notice	
02/10/2022	2022 Annual Meeting Notice	

17.3.2 Conduct Public Meeting

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct (at least) one public meeting annually as an opportunity for the public to provide input on the adequacy of the SWPPP.

Document all public meetings each reporting period, including the following information:

1. Description of the event
 2. Event date and venue
-

3. A copy of the agenda and description of any distributed materials and posted exhibits
4. Number of participants.
5. A summary of verbal input and copies of relevant written input submitted by the public
6. Responses to written input received regarding the SWPPP, including a summary of any modifications made to the SWPPP as a result of the written input received

Planned: 2021 2022

Complete: 2021 2022

Activity Date	Name	Description
05/01/2021	2021 Annual Public Meeting	Held as part of the City's Arbor Day Event and Green Fair. Staff spoke with approximately 200 residents and students as part of the event about stormwater and other water resources related issues. No substantive comments were received about the SWPPP, so no modifications were made.
03/11/2022	2022 Annual Public Meeting	Held as part of the Everything Spring Expo at Grace Church in Eden Prairie.

17.3.3 Post SWPPP Document Online and Receive Input

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

The SWPPP Document will be posted on the City's website and a link to email the City's water resources coordinator will be provided in that same location so comments can be easily submitted.

Based on emails received through the website for other items, this is likely to be a better use of time and energy for receiving public input than publishing notice and holding a special public meeting.

Planned: 2023 2024 2025

Complete: 2023

Activity Date	Name	Description
12/01/2023	Ongoing Input Opportunity	The website contains the SWPPP Document and past annual reports: https://www.edenprairie.org/community/sustainable-eden-prairie/water/stormwater-and-surface-water , as well as an opportunity for the public to provide comments on the page.

17.4 Public Access to SWPPP Documents

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Provide access to the SWPPP document, Annual Reports, and other documentation that supports or describes the SWPPP for public review, upon request. All public data requests are subject to the Minnesota Government Data Practices Act, Minn. Statute Section 13.

Goals

17.4.1 Website Access to SWPPP Documents

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide public access to the SWPPP and related documents through the MS4 website including the SWPPP document, Annual Reports and related documents (regulatory mechanism, annual budgets, etc.)

Provide a current list of hyperlinks to the SWPPP and related documents described above each reporting period.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
None		

17.4.2 SWPPP Program Document Access

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide public access to printed copies of the SWPPP, Annual Report and other related documentation at public facilities (MS4 government facilities, community centers, public library).

Identify locations where printed copies of the SWPPP, Annual Report and related documents are publicly accessible each reporting period.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
None		

17.5 Public Input Review and Consideration

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Consider public input, oral and written, submitted by the public to the permittee, regarding the SWPPP. Evaluate the input and consider any modifications to the SWPPP as a result of the written input received.

Goals

17.5.1 Consider Public Input

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Collect and review all public input for consideration of potential modification of the SWPPP, including written input and records of verbal feedback submitted by the public regarding the SWPPP. Identify any modification of the SWPPP resulting from the public input.

Provide a summary of all public input regarding the SWPPP collected each reporting period, including the following information:

1. Description of the meeting or event
2. Event date and venue
3. A copy of the agenda and description of any distributed materials and posted exhibits
4. Number of participants.
5. A summary of verbal input and copies of relevant written input submitted by the public
6. Responses to written input received regarding the SWPPP, including a summary of any modifications made to the SWPPP as a result of the written input received

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
None		

17.6 Public Involvement Activity

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Provide a minimum of one (1) public involvement activity annually that includes a pollution prevention or water quality theme (e.g., rain barrel distribution event, rain garden workshop, cleanup event, storm drain stenciling, volunteer water quality monitoring, adopt a storm drain program, household hazardous waste collection day, etc.).

Goals

17.6.1 Public Involvement Activity

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide at least one public involvement activity annually that includes a pollution prevention or water quality theme. (Examples include a rain barrel distribution event, rain garden workshop, cleanup event, storm drain stenciling, volunteer water quality monitoring, adopt a storm drain program, household hazardous waste collection day, etc.)

Document each public involvement activity with at least the following information:

1. Description of event
2. Event date and location
3. Estimated number of participants
4. Description (or uploaded copy) of any educational information distributed to participants

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022 2023

Activity Date	Name	Description
None		

17.8 Public Participation/ Involvement Program Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Conduct an annual assessment of the Public Participation/ Involvement program to evaluate program compliance, the status of achieving the measurable requirements in the MS4 permit and SWPPP and determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Goals

17.8.1 Annual Public Participation Program Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct an annual assessment of the Public Participation/ Involvement Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022

Activity Date	Name	Description
01/13/2023	2022 Program Assessment	

17.8.2 Public Participation/ Involvement Program Modifications

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Identify modifications made to the public education program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

Planned: 2021 2022 2023 2024 2025

Complete: 2021 2022

Activity Date	Name	Description
01/13/2023	2022 Program Modifications	

18 Illicit Discharge Detection and Elimination

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description:

18.1 MCM 3: Illicit Discharge Detection and Elimination (IDDE). [Minn. R. 7090]

18.2 New permittees must develop, implement, and enforce, and existing permittees must revise their current program as necessary, and continue to implement and enforce, a program to detect and eliminate illicit discharges into the MS4. The permittee must incorporate Section 18 requirements into their program.

18.3 The permittee must maintain a map of the permittee's MS4, as required in Section 14.

18.4 To the extent allowable under state or local law, the permittee must develop, implement, and enforce a regulatory mechanism(s) that prohibits non-stormwater discharges into the permittee's MS4, except those non-stormwater discharges authorized in item 3.2. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee. The regulatory mechanism(s) must also include items 18.5 and 18.6, as applicable.

18.5 For cities, townships, and counties, the permittee's regulatory mechanism(s) must require owners or custodians of pets to remove and properly dispose of feces on permittee owned land areas.

18.6 For cities and townships, the permittee's regulatory mechanism(s) must require proper salt storage at commercial, institutional, and non-NPDES permitted industrial facilities. At a minimum, the regulatory mechanism(s) must require the following:

- a. designated salt storage areas must be covered or indoors;
- b. designated salt storage areas must be located on an impervious surface; and
- c. implementation of practices to reduce exposure when transferring material in designated salt storage areas (e.g., sweeping, diversions, and/or containment).

18.7 The permittee must incorporate illicit discharge detection into all inspection and maintenance activities conducted in items 21.9, 21.10, and 21.11. Where feasible, the permittee must conduct illicit discharge inspections during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).

18.8 At least once each calendar year, the permittee must train all field staff in illicit discharge recognition (including conditions which could cause illicit discharges) and reporting illicit discharges for further investigation. Field staff includes, but is not limited to, police, fire department, public works, and parks staff. Training for this specific requirement may include, but is not limited to, videos, in-person presentations, webinars, training documents, and/or emails.

18.9 The permittee must ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's IDDE program. Individuals includes, but is not limited to, individuals responsible for investigating, locating, eliminating illicit discharges, and/or enforcement. The permittee must ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

18.10 The permittee must maintain a written or mapped inventory of priority areas the permittee identifies as having a higher likelihood for illicit discharges. At a minimum, the permittee must evaluate the following for potential inclusion in the inventory:

- a. land uses associated with business/industrial activities;
- b. areas where illicit discharges have been identified in the past; and

c. areas with storage of significant materials that could result in an illicit discharge.

18.11 To the extent allowable under state or local law, the permittee must conduct additional illicit discharge inspections in areas identified in item 18.10.

18.12 The permittee must implement written procedures for investigating, locating, and eliminating the source of illicit discharges. At a minimum, the written procedures must include:

- a. a timeframe in which the permittee will investigate a reported illicit discharge;
- b. use of visual inspections to detect and track the source of an illicit discharge;
- c. tools available to the permittee to investigate and locate an illicit discharge (e.g., mobile cameras, collecting and analyzing water samples, smoke testing, dye testing, etc.);
- d. cleanup methods available to the permittee to remove an illicit discharge or spill; and
- e. name or position title of responsible person(s) for investigating, locating, and eliminating an illicit discharge.

18.13 The permittee must implement written procedures for responding to spills, including emergency response procedures to prevent spills from entering the MS4. The written procedures must also include the immediate notification of the Minnesota Department of Public Safety Duty Officer at 1-800-422-0798 (toll free) or 651-649-5451 (Metro area), if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. 115.061.

18.14 The permittee must maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) in Section 18. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool;
- b. timeframes to complete corrective actions; and
- c. name or position title of responsible person(s) for conducting enforcement.

18.15 The permittee must document the following information:

- a. date(s) and location(s) of IDDE inspections conducted in accordance with items 18.7 and 18.11;
- b. reports of alleged illicit discharges received, including date(s) of the report(s), and any follow-up action(s) taken by the permittee;
- c. date(s) of discovery of all illicit discharges;
- d. identification of outfalls, or other areas, where illicit discharges have been discovered;
- e. sources (including a description and the responsible party) of illicit discharges (if known); and
- f. action(s) taken by the permittee, including date(s), to address discovered illicit discharges.

18.16 For each training in item 18.8 and 18.9, the permittee must document:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

18.17 The permittee must document any enforcement conducted pursuant to the ERPs in item 18.14, including verbal warnings. At a minimum, the permittee must document the following:

- a. name of the person responsible for violating the terms and conditions of the permittee's regulatory mechanism(s);
- b. date(s) and location(s) of the observed violation(s);
- c. description of the violation(s);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

18.18 The permittee must conduct an annual assessment of the IDDE program to evaluate program compliance, the status of achieving the measurable requirements in Section 18

and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., trainings, inventory, inspections, enforcement, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Best Management Practices

18.2 IDDE Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

(New permittees) Develop, implement, and enforce...

(Existing permittees) Revise the current IDDE program as necessary and continue to implement and enforce the program to detect and eliminate illicit discharges into the MS4. Incorporate Section 18 requirements into the program.

Goals

18.2.1 IDDE Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Prepare or update, maintain and implement an Illicit Discharge Detection and Elimination Program in compliance with the MS4 permit requirements (18.3-18.18).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

Activity Date	Name	Description
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None		
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18.3 Storm Sewer System Map

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop and maintain a storm sewer system map of the **small MS4** (as required by Section 14) that depicts the following:

- the permittee's entire MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes;
- outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinates;
- structural stormwater BMPs that are part of the permittee's MS4; and
- all receiving waters.

Goals

18.3.1 Develop Storm Sewer System Map

Responsible Staff / Position:

Description

Develop a storm sewer system map as required and including the listed items.

Document completion of this goal by providing a copy of, or link to the completed storm sewer system map.

Activity Date	Name	Description
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None

18.3.2 Annual Update Storm - Sewer System Map

Responsible Staff / Position:

Description

Review and update the storm sewer system map annually to show changes in the storm sewer system, outfalls, structural stormwater BMPs and receiving waters.

Provide a narrative summary of storm sewer system map updates and a copy of or link to the updated storm sewer system map each reporting period.

Activity Date	Name	Description
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None

18.4 Regulatory Mechanism - IDDE

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

To the extent allowable under state or local law, develop, implement, and enforce a regulatory mechanism(s) that prohibits non-stormwater discharges into the permittee's MS4, except those non-stormwater discharges authorized in item 3.2 (Authorized Non-Stormwater Discharges).

A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the MS4.

The regulatory mechanism(s) must also include items 18.5 and 18.6, as applicable.

18.5 For cities, townships, and counties, the permittee's regulatory mechanism(s) must require owners or custodians of pets to remove and properly dispose of feces on permittee owned land areas.

18.6 For cities and townships, the permittee's regulatory mechanism(s) must require proper salt storage at commercial, institutional, and non-NPDES permitted industrial facilities. At a minimum, the regulatory mechanism(s) must require the following:

- a. designated salt storage areas must be covered or indoors;
- b. designated salt storage areas must be located on an impervious surface; and
- c. implementation of practices to reduce exposure when transferring material in designated salt storage areas (e.g., sweeping, diversions, and/or containment).

Goals

18.4.1 IDDE Regulatory Mechanism

Responsible Staff / Position:

Description

Develop and adopt a regulatory mechanism to effectively prohibit non-stormwater discharges into the small MS4 as required. Review the IDDE regulatory mechanism and related policies and procedures each reporting period to improve the regulatory mechanism effectiveness

Summarize the results of the review as described each reporting period, including specific revisions required. Provide a copy of or link to the adopted IDDE regulatory mechanism.

Activity Date	Name	Description
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None		
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18.4.2 Revisions - IDDE Regulatory Mechanism

Responsible Staff / Position:

Description

Develop, adopt and implement revisions to the IDDE regulatory mechanism and associated policies or procedures as necessary to improve effectiveness and permit compliance.

Summarize any revisions to the IDDE regulatory mechanism developed, adopted or implemented each

reporting period.

Activity Date	Name	Description
None		

18.4.3 Enforcement - IDDE Regulatory Mechanism

Responsible Staff / Position:

Description

Enforce provisions of the adopted IDDE regulatory mechanism and associated policies and procedures.

Summarize enforcement actions initiated or completed under the IDDE regulatory mechanism each reporting period, including at a minimum, the following:

1. Name of the person responsible for violating the terms and conditions of the permittee's Regulatory Mechanism(s)
2. Date(s) and location(s) of the observed violation(s)
3. Description of the violation(s), including reference(s) to relevant Regulatory Mechanism(s)
4. Corrective action(s) (including completion schedule) issued by the permittee
5. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
6. Referrals to other regulatory organizations (if any)
7. Date(s) violation(s) resolved

Activity Date	Name	Description
None		

18.7 Dry Weather Illicit Discharge Inspections

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Incorporate illicit discharge detection into all inspection and maintenance activities conducted under the following permit items:

- 21.9 Structural Stormwater BMPs
- 21.10 Ponds and Outfalls

Where feasible, conduct illicit discharge inspections during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).

Goals

18.7.1 Inspections for Illicit Discharges

Responsible Staff / Position:

Description

Include identification of potential illicit discharges in all routine inspections of structural stormwater BMPs, ponds, outfalls, stockpiles, storage and material handling areas conducted during periods of dry weather.

List any potential and confirmed illicit discharges identified as part of routine inspections described above each reporting period. Identify steps taken to eliminate the illicit discharge and the result of the completed actions.

Activity Date	Name	Description
None		

18.8 Field Staff Training - Illicit Discharge Recognition and Reporting

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Conduct annual (minimum) training for all field staff in illicit discharge recognition (including conditions which could cause illicit discharges) and reporting illicit discharges for further investigation.

Field staff includes, but is not limited to, police, fire department, public works, and parks staff. Training for this specific requirement may include, but is not limited to, videos, in-person presentations, webinars, training documents, and/or emails

Goals

18.8.1 Field Staff Training - Illicit Discharge Recognition and Reporting

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Description

Provide illicit discharge identification and elimination in ongoing training for municipal employees including instruction on source identification techniques, proper notification procedures and discharge response procedures.

Provide a summary of IDDE training provided each reporting period, including:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

Planned: 2021 2022 2023 2024 2025 2026

Complete:

Activity Date	Name	Description
08/05/2022	U of M IDDE Course	The Water Resources Coordinator successfully completed the University of Minnesota's online course MS1108 "Illicit Discharge Detection and Elimination (IDDE) for Municipal Staff."

18.9 Staff (Non-Field) Illicit Discharge Recognition and Reporting

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Provide initial training commensurate with individual's responsibilities as they relate to the IDDE program and ensure that refresher-training is provided every three (3) calendar years following the initial training.

Individuals includes, but is not limited to, those responsible for investigating, locating, eliminating illicit discharges, and/or enforcement.

Goals

18.9.1 Non-Field Staff IDDE Training

Responsible Staff / Position:

Description

Conduct initial training for new individuals and refresher training for all individuals as required.

Provide a summary of IDDE training provided each reporting period, including the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

Activity Date	Name	Description
None		

18.10 Identify and Inspect Priority Areas for Potential Illicit Discharge

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop and maintain a written or mapped inventory of priority areas identified as having a higher likelihood for illicit discharges.

At a minimum, the permittee must evaluate the following for potential inclusion in the inventory:

- a. land uses associated with business/industrial activities;
- b. areas where illicit discharges have been identified in the past; and
- c. areas with storage of significant materials that could result in an illicit discharge.

Goals

18.10.1 Illicit Discharge Inspection Priority Areas

Responsible Staff / Position:

Description

Develop and maintain a list of priority areas likely to have illicit discharges based on the characteristics described and local municipal employee knowledge. Review and update the list annually.

Provide a copy of or link to the updated priority area list each reporting period.

Activity Date	Name	Description
None		

18.11 Inspection of Priority Areas for Illicit Discharges

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Conduct additional illicit discharge inspections in areas identified in item 18.10.

Goals

18.11.1 Illicit Discharge Inspection - Priority Areas

Responsible Staff / Position:

Description

Inspect priority areas identified as likely to have priority discharges.

Provide a summary of priority area inspections completed and inspection results each reporting period.
Include the following:

1. Date(s) of priority area inspections
2. Location(s) of priority area inspections
3. Report of any alleged illicit discharge detected
4. Source(s) (including a description and responsible party) of illicit discharges (if known)
5. Actions taken (including date(s)) to address discovered illicit discharges
6. Aa list of any illicit discharges identified with the status of resolution of the discharge.

Activity Date	Name	Description
None		

18.12 Illicit Discharge Detection and Elimination Procedures

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop and implement written procedures for investigating, locating, and eliminating the source of illicit discharges. At a minimum, the written procedures must include:

- a. a timeframe for investigation of a reported illicit discharge;
- b. use of visual inspections to detect and track the source of an illicit discharge;
- c. tools available to investigate and locate an illicit discharge (e.g., mobile cameras, collecting and analyzing water samples, smoke testing, dye testing, etc.);
- d. cleanup methods available to remove an illicit discharge or spill; and
- e. name or position title of responsible person(s) for investigating, locating, and eliminating an illicit discharge.

Goals

18.12.1 Develop and Maintain IDDE Procedures

Responsible Staff / Position:

Description

Develop and maintain the procedures as described, including an annual review to consider revisions to improve permit compliance and program effectiveness.

Provide a reference to, or copy of, the current IDDE Procedures and a summary of revisions completed each reporting period.

Activity Date	Name	Description
None		

18.13 Illicit Discharge (Spill) Response Procedures

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop and implement written procedures for responding to spills, including emergency response procedures to prevent spills from entering the MS4.

The written procedures must also include the immediate notification of the Minnesota Department of Public Safety Duty Officer at 1-800-422-0798 (toll free) or 651-649-5451 (Metro area), if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. 115.061.

Review the procedures annually and modify as necessary to maintain permit compliance and program effectiveness.

Goals

18.13.1 Develop and Maintain Illicit Discharge Response Procedures

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop procedures for timely response to known, suspected and reported illicit discharges as described. Review the procedures annually and update as necessary to maintain permit compliance and program effectiveness.

Provide a copy of or link to the required procedures, including a summary of any planned or completed revisions each reporting period.

Planned: 2021 2022 2023 2024 2025 2026

Complete: 2021 2022

Activity Date	Name	Description
12/01/2021	HAZMAT Incidents SOG	The Eden Prairie Fire Department (EPFD) has established these guidelines for firefighter behavior in an effort to protect its firefighters and the interests of the City of Eden Prairie. (4.3.43 HAZMAT Incidents)
06/20/2022	EOP for HAZMAT	The City Fire Department maintains an Emergency Operations Plan, which has a section on Hazardous Materials. This section is confidential and cannot be shared without approval from the Fire Chief and/or Asst. Chief of Emergency Management and Health/Safety therefore it is not attached here.

18.13.2 Implement Illicit Discharge ERP

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Implement Illicit Discharge emergency response procedures to respond to contaminant spills and implement corrective actions.

Summarize emergency responses conducted to identified illicit discharge sources and reported spills each reporting period, including a list of each occurrence and description or resulting resolution.

Activity Date	Name	Description
None		

18.14 ID Enforcement Response Procedures

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Develop and maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) in Section 18. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool;
- b. timeframes to complete corrective actions; and
- c. name or position title of responsible person(s) for conducting enforcement.

Goals

18.14.1 Develop and Maintain Enforcement Response Procedures

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop enforcement response procedures to compel compliance with regulatory requirements as described. Review the procedures annually and update as necessary to maintain permit compliance and program effectiveness.

Provide a copy of or link to the required procedures, including a summary of any planned or completed revisions each reporting period.

Activity Date	Name	Description
None		

18.17 Enforcement Response Actions

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Document any enforcement conducted pursuant to the ERPs in item 18.14, including verbal warnings.

Goals

18.17.1 ID Enforcement Action Report

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

For each Illicit Discharge enforcement response, document the following:

- a. name of the person responsible for violating the terms and conditions of the regulatory mechanism(s);
- b. date(s) and location(s) of the observed violation(s);
- c. description of the violation(s);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

Activity Date	Name	Description
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None

18.18 IDDE Program Annual Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Conduct an annual assessment of the IDDE program to evaluate program compliance, the status of achieving the measurable requirements in Section 18 and determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Goals

18.18.1 Annual IDDE Program Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct an annual assessment of the Illicit Discharge Detection and Elimination Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

Activity Date	Name	Description
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None

18.18.2 IDDE Program Modifications

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Identify modifications made to the Illicit Discharge Detection and Elimination program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

Activity Date	Name	Description
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None

19 Construction Site Runoff Control

Responsible Staff / Position: Randy Slick
Senior Engineering Technician
(952) 949-8322

Description:

19.1 MCM 4: Construction Site Stormwater Runoff Control.

19.2 New permittees must develop, implement, and enforce, and existing permittees must revise their current program, as necessary, and continue to implement and enforce, a Construction Site Stormwater Runoff Control program. The program must address construction activity with a land disturbance of greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, within the permittee's jurisdiction and that discharge to the permittee's MS4. The permittee must incorporate Section 19 requirements into their program.

19.3 To the extent allowable under state or local law, the permittee must develop, implement, and enforce a regulatory mechanism(s) that establishes requirements for erosion, sediment, and waste controls that is at least as stringent as the Agency's most current Construction Stormwater General Permit (MNR100001), herein referred to as the CSW Permit. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

19.4 When the CSW Permit is reissued, the permittee must revise their regulatory mechanism(s), if necessary, within 12 months of the issuance date of that permit, to be at least as stringent as the requirements for erosion, sediment, and waste controls described in the CSW Permit.

19.5 The permittee's regulatory mechanism(s) must require that owners and operators of construction activity develop site plans that must be submitted to the permittee for review and confirmation that regulatory mechanism(s) requirements have been met, prior to the start of construction activity. The regulatory mechanism(s) must require the owners and operators of construction activity to keep site plans up-to-date with regard to stormwater runoff controls. The regulatory mechanism(s) must require that site plans incorporate the following erosion, sediment, and waste controls that are at least as stringent as described in the CSW Permit:

- a. erosion prevention practices;
- b. sediment control practices;
- c. dewatering and basin draining;
- d. inspection and maintenance;
- e. pollution prevention management measures;
- f. temporary sediment basins; and
- g. termination conditions.

19.6 The permittee must implement written procedures for site plan reviews conducted by the permittee prior to the start of all construction activity, to ensure compliance with requirements of the regulatory mechanism(s). At a minimum, the procedures must include:

- a. written notification to owners and operators proposing construction activity, including projects less than one acre that are part of a larger common plan of development or sale, of the need to apply for and obtain coverage under the CSW Permit; and
- b. use of a written checklist, consistent with the requirements of the regulatory mechanism(s), to document the adequacy of each site plan required in item 19.5.

19.7 The permittee must implement an inspection program that includes written procedures for conducting site inspections, to determine compliance with the permittee's regulatory mechanism(s). The inspection program must also meet the requirements in items 19.8 and 19.9.

19.8 The permittee must maintain written procedures for identifying high-priority and low-priority sites for inspection. At a minimum, the written procedures must include:

- a. a detailed explanation describing how sites will be categorized as either high-priority or low-priority;
- b. a frequency at which the permittee will conduct inspections for high-priority sites;
- c. a frequency at which the permittee will conduct inspections for low-priority sites; and
- d. the name(s) of individual(s) or position title(s) responsible for conducting site inspections.

19.9 The permittee must implement a written checklist to document each site inspection when determining compliance with the permittee's regulatory mechanism(s). At a minimum, the checklist must include the permittee's inspection findings on the following areas, as applicable to each site:

- a. stabilization of exposed soils (including stockpiles);
- b. stabilization of ditch and swale bottoms;
- c. sediment control BMPs on all downgradient perimeters of the project and upgradient of buffer zones;
- d. storm drain inlet protection;
- e. energy dissipation at pipe outlets;
- f. vehicle tracking BMPs;
- g. preservation of a 50 foot natural buffer or redundant sediment controls where stormwater flows to a surface water within 50 feet of disturbed soils;
- h. owner/operator of construction activity self-inspection records;
- i. containment for all liquid and solid wastes generated by washout operations (e.g., concrete, stucco, paint, form release oils, curing compounds, and other construction materials); and
- j. BMPs maintained and functional.

19.10 The permittee must implement 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.

19.11 The permittee must ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's Construction Site Stormwater Runoff Control program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews, site inspections, and/or enforcement. The permittee must ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

19.12 The permittee must maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) in item 19.3. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

19.13 For each site plan review conducted by the permittee, the permittee must document

the following:

- a. project name;
- b. location;
- c. total acreage to be disturbed;
- d. owner and operator of the proposed construction activity;
- e. proof of notification to obtain coverage under the CSW Permit, as required in item 19.6, or proof of coverage under the CSW Permit; and
- f. any stormwater related comments and supporting completed checklist, as required in item 19.6, used by the permittee to determine project approval or denial.

19.14 For each training in item 19.11, the permittee must document:

- a. general subject matter covered;
 - b. names and departments of individuals in attendance; and c. date of each event.
- 19.15** The permittee must document any enforcement conducted pursuant to the ERPs in item 19.12, including verbal warnings. At a minimum, the permittee must document the following:

- a. name of the person responsible for violating the terms and conditions of the permittee's regulatory mechanism(s);
- b. date(s) and location(s) of the observed violation(s);
- c. description of the violation(s);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

19.16 The permittee must conduct an annual assessment of the Construction Site Stormwater Runoff Control program to evaluate program compliance, the status of achieving the measurable requirements in Section 19 and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., inventory, trainings, site plan reviews, inspections, enforcement, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Best Management Practices

19.2 Construction Site Stormwater Runoff Control Program

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Required: Yes

Description

(New permittees) Develop, implement, and enforce...

(Existing permittees) Review and revise the MS4's current program, as necessary, and continue to implement and enforce...

... a Construction Site Stormwater Runoff Control program. The program must address construction activity with a land disturbance of greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, within the MS4 jurisdiction and that discharge to the permittee's MS4. Incorporate all Section 19 requirements into their program.

Goals

19.2.1 Construction Site Stormwater Runoff Control Program

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Description

Prepare or update, maintain and implement a Construction Site Stormwater Runoff Control Program in compliance with the MS4 permit requirements (19.3-19.16).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

Activity Date	Name	Description
None		

19.3 Regulatory Mechanism - Erosion, Sediment and Waste Controls

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Required: Yes

Description

To the extent allowable under state or local law, develop, implement, and enforce a regulatory mechanism(s) that establishes requirements for erosion, sediment, and waste controls that is at least as stringent as the Agency's most current Construction Stormwater General Permit (MNR100001), herein referred to as the CSW Permit.

A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

Revise their regulatory mechanism(s), if necessary, within 12 months of the issuance date of the CSW Permit, to be at least as stringent as the requirements for erosion, sediment, and waste controls described in the CSW Permit.

The regulatory mechanism(s) must require that owners and operators of construction activity develop site plans that must be submitted for review and confirmation that regulatory mechanism(s) requirements have been met, prior to the start of construction activity. The regulatory mechanism(s) must require the owners and operators of construction activity to keep site plans up-to-date with regard to stormwater runoff controls. The regulatory mechanism(s) must require that site plans incorporate the following erosion, sediment, and waste controls that are at least as stringent as described in the CSW Permit:

- a. erosion prevention practices;
- b. sediment control practices;
- c. dewatering and basin draining;
- d. inspection and maintenance;
- e. pollution prevention management measures;
- f. temporary sediment basins; and
- g. termination conditions.

Goals

19.3.1 ESC Regulatory Mechanism

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Description

Develop, adopt, implement and maintain a regulatory mechanism to establish requirements for erosion and sediment controls and waste controls from construction activity as described. Review the regulatory mechanism and associated policies and procedures annually to maintain permit compliance and program effectiveness.

Summarize the results of the review as described each reporting period and provide a copy of or link to the adopted Construction Site Stormwater Runoff Control regulatory mechanism.

Activity Date	Name	Description
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None		
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19.3.2 Revisions - ESC Regulatory Mechanism

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Description

Develop, adopt and implement revisions to the Construction Site Stormwater Runoff Control regulatory mechanism and associated policies or procedures as necessary to improve effectiveness and permit compliance.

Summarize any revisions to the regulatory mechanism developed, adopted or implemented each reporting period.

Activity Date	Name	Description
None		

19.3.3 Enforcement - ESC Regulatory Mechanism

Responsible Staff / Position: Randy Slick
Senior Engineering Technician
(952) 949-8322

Description

Enforce provisions of the adopted construction activity ESC and waste control regulatory mechanism and associated policies and procedures.

Summarize enforcement actions initiated or completed under the Construction Site Stormwater Runoff Control regulatory mechanism each reporting period, including at a minimum, the following:

1. Name of the person responsible for violating the terms and conditions of the Regulatory Mechanism(s)
2. Date(s) and location(s) of the observed violation(s)
3. Description of the violation(s), including reference(s) to relevant Regulatory Mechanism(s)
4. Corrective action(s) (including completion schedule) issued
5. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
6. Referrals to other regulatory organizations (if any)
7. Date(s) violation(s) resolved

Activity Date	Name	Description
None		

19.6 Site Plan Review - ESC

Responsible Staff / Position:

Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Implement written procedures for site plan reviews conducted by prior to the start of all construction activity, to ensure compliance with requirements of the regulatory mechanism(s). At a minimum, the procedures must include:

- a. written notification to owners and operators proposing construction activity, including projects less than one acre that are part of a larger common plan of development or sale, of the need to apply for and obtain coverage under the CSW Permit; and
- b. use of a written checklist, consistent with the requirements of the regulatory mechanism(s), to document the adequacy of each site plan required in item 19.5 of the permit.

Goals

19.6.1 Develop Construction Site Stormwater Runoff Control Review Procedures

Responsible Staff / Position:

Description

Develop procedures for review of construction site erosion and sediment control and waste control practices as described, including at least the following for each site plan review conducted:

- a. project name;
- b. location;
- c. total acreage to be disturbed;
- d. owner and operator of the proposed construction activity;
- e. proof of notification to obtain coverage under the CSW Permit, as required in item 19.6 of the permit, or proof of coverage under the CSW Permit; and
- f. any stormwater related comments and supporting completed checklist, as required in item 19.6 of the permit, used by the permittee to determine project approval or denial.

Activity Date	Name	Description
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None		
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19.6.2 Maintain Construction Site ESC Review Procedures

Responsible Staff / Position:

Description

Review construction site ESC review procedures annually and update as necessary to maintain an effective program in compliance with all permit requirements.

Summarize any planned or completed revisions to the ESC site design review procedures each reporting period and provide a copy of or link to the current procedures.

Activity Date	Name	Description
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None		
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19.6.3 Implement ESC Site Plan Review Program

Responsible Staff / Position:

Description

Implement the construction site review procedures for construction activity erosion and sediment control and waste control.

Summarize construction activity site design reviews initiated or completed each reporting period. For each site plan review, document the following:

- a. project name;
- b. location;
- c. total acreage to be disturbed;
- d. owner and operator of the proposed construction activity;
- e. proof of notification to obtain coverage under the CSW Permit, as required in item 19.6, or proof of coverage under the CSW Permit; and
- f. any stormwater related comments and supporting completed checklist, as required in item 19.6, used by the permittee to determine project approval or denial.

Activity Date	Name	Description
None		

19.7 Site Inspections - Construction

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop and implement procedures for conducting inspections of construction sites to determine compliance with permittee's regulatory mechanisms.

Goals

19.7.1 Develop Construction Site Inspection Procedures

Responsible Staff / Position:

Description

Develop and implement an inspection program that includes written procedures for conducting site inspections, to determine compliance with the permittee's regulatory mechanism(s). The inspection program must also meet these requirements:

Maintain written procedures for identifying high-priority and low-priority sites for inspection that at a minimum must include:

- a. a detailed explanation describing how sites will be categorized as either high-priority or low-priority;
- b. a frequency at which the permittee will conduct inspections for high-priority sites;
- c. a frequency at which the permittee will conduct inspections for low-priority sites; and
- d. the name(s) of individual(s) or position title(s) responsible for conducting site inspections.

Develop and implement a written checklist to document each site inspection when determining compliance with the permittee's regulatory mechanism(s). At a minimum, the checklist must include the permittee's inspection findings on the following areas, as applicable to each site:

- a. stabilization of exposed soils (including stockpiles);
- b. stabilization of ditch and swale bottoms;
- c. sediment control BMPs on all downgradient perimeters of the project and upgradient of buffer zones;
- d. storm drain inlet protection;
- e. energy dissipation at pipe outlets;
- f. vehicle tracking BMPs;
- g. preservation of a 50 foot natural buffer or redundant sediment controls where stormwater flows to a surface water within 50 feet of disturbed soils;
- h. owner/operator of construction activity self-inspection records;
- i. containment for all liquid and solid wastes generated by washout operations (e.g., concrete, stucco, paint, form release oils, curing compounds, and other construction materials); and
- j. BMPs maintained and functional.

Activity Date	Name	Description
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None		
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19.7.2 Maintain Construction Site Inspection Procedures

Responsible Staff / Position:

Description

Review construction site inspection procedures annually and update as necessary to maintain an effective program in compliance with permit requirements.

Summarize any planned or completed revisions to the written construction site inspection procedures each reporting period and provide a copy of or link to the current procedures.

Activity Date	Name	Description
None		

19.7.3 Conduct Construction Site Stormwater Runoff Control Inspections

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct construction site erosion and sediment control and waste control inspections in accordance with the written program procedures and documentation.

Report on the number of inspections completed each reporting period, including inspection checklists and other means used to document site inspections.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete:

Activity Date	Name	Description
12/30/2022	2022 Inspections	Randy Slick performed at least 17 inspections prior to issuing land alteration permits.

19.10 Public Input - Construction Activities

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Development and implement written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public.

Goals

19.10.1 Develop and Maintain Public Input Procedures

Responsible Staff / Position:

Description

Develop and maintain procedures for receipt and consideration of reports of noncompliance or other construction activity related information by the public. Conduct an annual review of the procedures and revise as necessary to maintain program effectiveness and permit compliance.

Provide a copy of or link to the completed procedures with a summary of any planned or completed revisions completed in the reporting period.

Activity Date	Name	Description
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None

19.10.2 Receive and Consider Public Input

Responsible Staff / Position:

Description

Implement procedures for receipt and consideration of public input relative to noncompliance with stormwater management during construction activity and respond as appropriate to such input.

Summarize the public input regarding noncompliance with stormwater management related to construction activity each reporting period. Include the results of any public input resulting in resolution of noncompliant activity.

Activity Date	Name	Description
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None

19.11 Construction Site Stormwater Runoff Control Program Training

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Ensure that individuals receive training commensurate with their responsibilities as they relate to the Construction Site Stormwater Runoff Control program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews, site inspections, and/or enforcement.

Ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

Goals

19.11.1 Staff Training - Construction Site Stormwater Runoff Control Program

Responsible Staff / Position:

Description

Provide initial training commensurate with individual's responsibilities as they relate to the Construction Site Stormwater Runoff Program and ensure that refresher-training is provided every three (3) calendar years following the initial training.

Individuals includes, but is not limited to, those responsible for conducting site plan reviews, site inspections, and/or enforcement.

For each training, document the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

Activity Date	Name	Description
None		

19.12 Enforcement Response Procedures - Construction Activity

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop and maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) for Construction Site Stormwater Runoff Control (Permit section 19.3)

At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

Goals

19.12.1 Develop and Maintain ERP for Construction Activity

Responsible Staff / Position:

Description

Develop and adopt Enforcement Response Procedures (ERP) for construction activity to enforce provisions of the regulatory mechanism, policies and procedures. Review the construction activity ERP annually and update as necessary to maintain effectiveness and permit compliance.

Provide a copy of or link to the adopted ERP for construction activity and a summary of any resulting revision to the ERP initiated or completed each reporting period.

Activity Date	Name	Description
11/28/2022	2022 ERP	

19.15 Enforcement Reports - Construction Site Stormwater Runoff Control Program

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Document any enforcement conducted pursuant to the Construction Site Stormwater Runoff Control Program ERPs (permit section 19.12), including verbal warnings.

Goals

19.15.1 Enforcement Action Reporting - Construction Site Stormwater Runoff Control

Responsible Staff / Position:

Description

Document response actions conducted pursuant to the Construction Site Stormwater Runoff Program ERPs (Permit section 19.120, including verbal warnings.

At a minimum, the permittee must document the following:

- a. name of the person responsible for violating the terms and conditions of the permittee's regulatory mechanism(s);
- b. date(s) and location(s) of the observed violation(s);
- c. description of the violation(s);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

Activity Date	Name	Description
None		

19.16 Construction Site Stormwater Runoff Control Program Assessment

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Conduct an annual assessment of the Construction Site Stormwater Runoff Control program to evaluate program compliance, the status of achieving the measurable requirements for Construction Site Stormwater Runoff Control (Permit Section 19) and determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Goals

19.16.1 Annual Construction Site Stormwater Runoff Control Program Assessment

Responsible Staff / Position:

Description

Conduct an annual assessment of the Construction Site Stormwater Runoff Control Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

Activity Date	Name	Description
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None

19.16.2 Construction Site Stormwater Runoff Control Program Modifications

Responsible Staff / Position:

Description

Identify modifications made to the Construction Site Stormwater Runoff Control Program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

Activity Date	Name	Description
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None

20 Post-Construction Runoff Management

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Description:

20.1 MCM 5: Post-Construction Stormwater Management.

20.2 New permittees must develop, implement, and enforce, and existing permittees must revise their current program, as necessary, and continue to implement and enforce, a Post-Construction Stormwater Management program that prevents or reduces water pollution after construction activity is completed. The program must address construction activity with land disturbance of greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, within the permittee's jurisdiction and that discharge to the permittee's MS4. The permittee must incorporate Section 20 requirements into their program.

20.3 To the extent allowable under state or local law, the permittee must develop, implement, and enforce a regulatory mechanism(s) that incorporates items 20.4 through 20.15. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

20.4 The permittee's regulatory mechanism(s) must require owners of construction activity to submit site plans with post-construction stormwater management BMPs designed with accepted engineering practices to the permittee for review and confirmation that regulatory mechanism(s) requirements have been met, prior to start of construction activity.

20.5 The permittee's regulatory mechanism(s) must require owners of construction activity to treat the water quality volume on any project where the sum of the new impervious surface and the fully reconstructed impervious surface equals one or more acres.

20.6 For construction activity (excluding linear projects), the water quality volume must be calculated as one (1) inch times the sum of the new and the fully reconstructed impervious surface.

20.7 For linear projects, the water quality volume must be calculated as the larger of one (1) inch times the new impervious surface or one-half (0.5) inch times the sum of the new and the fully reconstructed impervious surface. Where the entire water quality volume cannot be treated within the existing right-of-way, a reasonable attempt to obtain additional right-of-way, easement, or other permission to treat the stormwater during the project planning process must be made. Volume reduction practices must be considered first, as described in item 20.8. Volume reduction practices are not required if the practices cannot be provided cost effectively. If additional right-of-way, easements, or other permission cannot be obtained, owners of construction activity must maximize the treatment of the water quality volume prior to discharge from the MS4.

20.8 Volume reduction practices (e.g., infiltration or other) to retain the water quality volume on-site must be considered first when designing the permanent stormwater treatment system. The General Permit does not consider wet sedimentation basins and filtration systems to be volume reduction practices. If the General Permit prohibits infiltration as described in item 20.9, other volume reduction practices, a wet sedimentation basin, or filtration basin may be considered.

20.9 Infiltration systems must be prohibited when the system would be constructed in areas:

- a. that receive discharges from vehicle fueling and maintenance areas, regardless of the amount of new and fully reconstructed impervious surface;
- b. where high levels of contaminants in soil or groundwater may be mobilized by the infiltrating stormwater. To make this determination, the owners and/or operators of construction activity must complete the Agency's site screening assessment checklist, which is available in the Minnesota Stormwater Manual, or conduct their own assessment. The assessment must be retained with the site plans;
- c. where soil infiltration rates are more than 8.3 inches per hour unless soils are amended to slow the infiltration rate below 8.3 inches per hour;
- d. 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;
- e. of predominately Hydrologic Soil Group D (clay) soils;
- f. in an Emergency Response Area (ERA) within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, Subp. 13, classified as high or very high vulnerability as defined by the Minnesota Department of Health;
- g. in an ERA within a DWSMA classified as moderate vulnerability unless the permittee performs or approves a higher level of engineering review sufficient to provide a functioning treatment system and to prevent adverse impacts to groundwater;
- h. outside of an ERA within a DWSMA classified as high or very high vulnerability unless the permittee performs or approves a higher level of engineering review sufficient to provide a functioning treatment system and to prevent adverse impacts to groundwater;
- i. within 1,000 feet up-gradient or 100 feet down gradient of active karst features; or
- j. that receive stormwater runoff from these types of entities regulated under NPDES for industrial stormwater: automobile salvage yards; scrap recycling and waste recycling facilities; hazardous waste treatment, storage, or disposal facilities; or air transportation facilities that conduct deicing activities. See "higher level of engineering review" in the Minnesota Stormwater Manual for more information.

20.10

For non-linear projects, where the water quality volume cannot cost effectively be treated on the site of the original construction activity, the permittee must identify, or may require owners of the construction activity to identify, locations where off-site treatment projects can be completed. If the entire water quality volume is not addressed on the site of the original construction activity, the remaining water quality volume must be addressed through off-site treatment and, at a minimum, ensure the requirements of items 20.11 through 20.14 are met.

20.11 The permittee must ensure off-site treatment project areas are selected in the following order of preference:

- a. locations that yield benefits to the same receiving water that receives runoff from the original construction activity;
- b. locations within the same Department of Natural Resource (DNR) catchment area as the original construction activity;
- c. locations in the next adjacent DNR catchment area up-stream; or
- d. locations anywhere within the permittee's jurisdiction.

20.12 Off-site treatment 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. Routine maintenance of structural stormwater BMPs already required by the General Permit cannot be used to meet this requirement.

20.13 Off-site treatment projects must be completed no later than 24 months after the start of the original construction activity. If the permittee determines more time is needed to complete the treatment project, the permittee must provide the reason(s) and schedule(s)

for completing the project in the annual report.

20.14 If the permittee receives payment from the owner of a construction activity for off-site treatment, the permittee must apply any such payment received to a public stormwater project, and all projects must comply with the requirements in items 20.11 through 20.13.

20.15 The permittee's regulatory mechanism(s) must include the establishment of legal mechanism(s) between the permittee and owners of structural stormwater BMPs not owned or operated by the permittee, that have been constructed to meet the requirements in Section 20. The legal mechanism(s) must 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 the owner of that structural stormwater BMP has not ensured proper function;
- b. 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; and
- c. are designed to protect/preserve structural stormwater BMPs. If structural stormwater BMPs change, causing decreased effectiveness, new, repaired, or improved structural stormwater BMPs must be implemented to provide equivalent treatment to the original BMP.

20.16 The permittee must maintain a written or mapped inventory of structural stormwater BMPs not owned or operated by the permittee that meet all of the following criteria:

- a. the structural stormwater BMP includes an executed legal mechanism(s) between the permittee and owners responsible for the long-term maintenance, as required in item 20.15; and
- b. the structural stormwater BMP was implemented on or after August 1, 2013.

20.17 The permittee must implement written procedures for site plan reviews conducted by the permittee prior to the start of construction activity, to ensure compliance with requirements of the permittee's regulatory mechanism(s).

20.18 The permittee must ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's Post-Construction Stormwater Management program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews and/or enforcement. The permittee must ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

20.19 The permittee must maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) required in Section 20. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

20.20 For each site plan review conducted by the permittee, the permittee must document the following:

- a. supporting documentation used to determine compliance with Section 20 of the General Permit, including any calculations for the permanent stormwater treatment system;
- b. the water quality volume that will be treated through volume reduction practices (e.g., infiltration or other) compared to the total water quality volume required to be treated;
- c. documentation associated with off-site treatment projects authorized by the permittee, including rationale to support the location of permanent stormwater treatment projects in accordance with items 20.10 and 20.11;
- d. payments received and used in accordance with item 20.14; and
- e. all legal mechanisms drafted in accordance with item 20.15, including date(s) of the agreement(s) and name(s) of all responsible parties involved.

20.21 For each training in item 20.18, the permittee must document:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

20.22 The permittee must document any enforcement conducted pursuant to the ERPs in item 20.19, including verbal warnings. At a minimum, the permittee must document the following:

- a. name of the person responsible for violating the terms and conditions of the permittee's regulatory mechanism(s);
- b. date(s) and location(s) of the observed violation(s);
- c. description of the violation(s);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

20.23 The permittee must conduct an annual assessment of the Post-Construction Stormwater Management program to evaluate program compliance, the status of achieving the measurable requirements in Section 20, and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., inventory, trainings, site plan reviews, inspections, enforcement, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Best Management Practices

20.2 Post-Construction Stormwater Management Program

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

(New permittees) Develop, implement, and enforce...

(Existing permittees) Revise your current program, as necessary, and continue to implement and enforce...

...a Post-Construction Stormwater Management program that prevents or reduces water pollution after construction activity is completed. The program must address construction activity with land disturbance of greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, within the permittee's jurisdiction and that discharge to the permittee's MS4. All Section 20 requirements must be incorporated into the program.

Goals

20.2.1 Post-Construction Stormwater Management Program

Responsible Staff / Position:

Description

Prepare or update, maintain and implement a Post-Construction Stormwater Management Program in compliance with the MS4 permit requirements (20.3-20.23).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

Activity Date	Name	Description
None		

20.3 Regulatory Mechanism - Post-Construction Stormwater Management

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

To the extent allowable under state or local law, develop, implement, and enforce a regulatory mechanism(s) that incorporates permit items 20.4 through 20.15. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

The regulatory mechanism(s) must:

- Require owners of construction activity to submit site plans with post-construction stormwater management BMPs designed with accepted engineering practices for review and confirmation that regulatory mechanism(s) requirements have been met, prior to start of construction activity.
- Require owners of construction activity to treat the water quality volume on any project where the sum of the new impervious surface and the fully reconstructed impervious surface equals one or more acres.
- Include the establishment of legal mechanism(s) between the permittee and owners of structural stormwater BMPs not owned or operated by the permittee, that have been constructed to meet the requirements in Section 20. The legal mechanism(s) must 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 the owner of that structural stormwater BMP has not ensured proper function;
 - b. 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; and
 - c. are designed to protect/preserve structural stormwater BMPs. If structural stormwater BMPs change, causing decreased effectiveness, new, repaired, or improved structural stormwater BMPs must be implemented to provide equivalent treatment to the original BMP.

Goals

20.3.1 Post-Construction Regulatory Mechanism

Responsible Staff / Position:

Description

Develop, adopt, implement and maintain a regulatory mechanism to establish requirements for post-construction stormwater management as described. Review the regulatory mechanism and associated policies and procedures annually to maintain permit compliance and program effectiveness.

Summarize the results of the review as described each reporting period and provide a copy of or link to the adopted Post-Construction Stormwater Management regulatory mechanism.

Activity Date	Name	Description
None		

20.3.3 Revisions - Post-Construction Stormwater Management Regulatory Mechanism

Responsible Staff / Position:

Description

Develop, adopt and implement revisions to the Post-Construction Stormwater Management regulatory mechanism and associated policies or procedures as necessary to improve effectiveness and permit compliance.

Summarize any revisions to the regulatory mechanism developed, adopted or implemented each reporting period.

Activity Date	Name	Description
None		

20.3.4 Enforcement - Post-Construction Stormwater Management Requirements

Responsible Staff / Position:

Description

Enforce provisions of the adopted Post-Construction Stormwater Management regulatory mechanism and associated policies and procedures.

Summarize enforcement actions initiated or completed under the regulatory mechanism each reporting period, including at a minimum, the following:

1. Name of the person responsible for violating the terms and conditions of the permittee's Regulatory Mechanism(s)
2. Date(s) and location(s) of the observed violation(s)
3. Description of the violation(s), including reference(s) to relevant Regulatory Mechanism(s)
4. Corrective action(s) (including completion schedule) issued by the permittee
5. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
6. Referrals to other regulatory organizations (if any)
7. Date(s) violation(s) resolved

Activity Date	Name	Description
None		

20.16 Structural BMP Mapped Inventory

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Maintain a written or mapped inventory of structural stormwater BMPs not owned or operated by the permittee that meet all of the following criteria:

- a. the structural stormwater BMP includes an executed legal mechanism(s) between the permittee and owners responsible for the long-term maintenance, as required in item 20.15; and
- b. the structural stormwater BMP was implemented on or after August 1, 2013.

Goals

20.16.1 Maintain Structural BMP Mapped Inventory

Responsible Staff / Position:

Description

Develop and maintain a mapped inventory of structural stormwater BMPs not owned or operated by the permittee. Review the inventory annually and update as necessary to address changes in existing BMPs or include new BMPs.

Provide a reference to or copy of the current mapped inventory each reporting period.

Activity Date	Name	Description
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None		
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20.17 Site Plan Review - Post-Construction Stormwater Management

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop, maintain and implement written procedures for site plan reviews by the permittee prior to the start of construction activity to ensure compliance with requirements of the Post-Construction Stormwater Management Regulatory Mechanism and all requirements stated in permit Sections 20.6 - 20.14.

Goals

20.17.1 Develop Post-Construction Stormwater Management Review Procedures

Responsible Staff / Position:

Description

Develop procedures for review of post-construction stormwater management plans as described, including notification procedures as required.

Provide a copy of or link to the required procedures.

Activity Date	Name	Description
12/30/2022	2022 Development Review Committee	The City holds a Development Review Committee weekly (currently on Thursday afternoons) where we discuss concerns from all City departments and divisions related to incoming development or redevelopment plans. The Water Resources Coordinator and Water Resources Engineer to provide feedback early and often. Notes from 2022 attached.

20.17.2 Maintain Post-Construction Stormwater Management Review Procedures

Responsible Staff / Position:

Description

Review post-construction stormwater management review procedures annually and update as necessary to maintain an effective program in compliance with all permit requirements.

Summarize any planned or completed revisions to the post-construction management site design review procedures each reporting period and provide a copy of or link to the current procedures.

Activity Date	Name	Description
None		

20.17.3 Implement Post-Construction Stormwater Management Site Plan Review Program

Responsible Staff / Position:

Description

Implement the post-construction stormwater management site review procedures.

For each site plan review conducted by the permittee, document the following:

- a. supporting documentation used to determine compliance with Section 20 of the General Permit, including any calculations for the permanent stormwater treatment system;
- b. the water quality volume that will be treated through volume reduction practices (e.g., infiltration or other) compared to the total water quality volume required to be treated;
- c. documentation associated with off-site treatment projects authorized by the permittee, including rationale to support the location of permanent stormwater treatment projects in accordance with items 20.10 and 20.11;
- d. payments received and used in accordance with item 20.14; and
- e. all legal mechanisms drafted in accordance with item 20.15, including date(s) of the agreement(s) and name(s) of all responsible parties involved.

Activity	Date	Name	Description
None			

20.18 Post-Construction Stormwater Management Program Training

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's Post-Construction Stormwater Management program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews and/or enforcement. Ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

Goals

20.18.1 Staff Training - Post-Construction Stormwater Management Program

Responsible Staff / Position:

Description

Provide initial training commensurate with individual's responsibilities as they relate to the Post-Construction Stormwater Management Program and ensure that refresher-training is provided every three (3) calendar years following the initial training.

Individuals includes, but is not limited to, those responsible for conducting site plan reviews, site inspections, and/or enforcement.

For each training, document the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

Activity Date	Name	Description
None		

20.19 Enforcement Response Procedures - Post-Construction Stormwater Management

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Develop and maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) for Post-Construction Stormwater Management (Permit Section 20.19).

At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

Goals

20.19.1 Develop and Maintain ERP for Post-Construction Stormwater Management

Responsible Staff / Position:

Description

Develop and adopt Enforcement Response Procedures (ERP) for Post-Construction Stormwater Management program activities to enforce provisions of the regulatory mechanism, policies and procedures. Review the ERP annually and update as necessary to maintain effectiveness and permit compliance.

Provide a copy of or link to the adopted ERP for Post-Construction Stormwater Management and a summary of any resulting revision to the ERP initiated or completed each reporting period.

Activity Date	Name	Description
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None

20.22 Enforcement Reports - Post-Construction Stormwater Management Program

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Document any enforcement conducted pursuant to the ERPs in item 20.19 for Post-Construction Stormwater Management, including verbal warnings.

Goals

20.22.1 Enforcement Action Reporting - Post-Construction Stormwater Management Program

Responsible Staff / Position:

Description

Document response actions conducted pursuant to the Post-Construction Stormwater Management Program ERPs, including verbal warnings.

At a minimum, document the following:

- a. name of the person responsible for violating the terms and conditions of the permittee's regulatory mechanism(s);
- b. date(s) and location(s) of the observed violation(s);
- c. description of the violation(s);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

Activity Date	Name	Description
None		

20.23 Post-Construction Stormwater Management Program Assessment

Responsible Staff / Position: Leslie Stovring
Public Works
(952) 949-8327

Required: Yes

Description

Conduct an annual assessment of the Post-Construction Stormwater Management program to evaluate program compliance, the status of achieving the measurable requirements in Section 20, and to determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Goals

20.23.1 Annual Post-Construction Stormwater Management Program Assessment

Responsible Staff / Position:

Description

Conduct an annual assessment of the Post-Construction Stormwater Management Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

Activity Date	Name	Description
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None

20.23.2 Post-Construction Stormwater Management Program Modifications

Responsible Staff / Position:

Description

Identify modifications made to the Post-Construction Stormwater Management Program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

Activity Date	Name	Description
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None

21 Pollution Prevention / Good Housekeeping

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description:

21.1 MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

21.2 New permittees must develop and implement, and existing permittees must revise their current program, as necessary, and continue to implement, an operations and maintenance program that prevents or reduces the discharge of pollutants to the MS4 from permittee owned/operated facilities and operations. The permittee must incorporate Section 21 requirements into their program

21.3 The permittee must maintain a written or mapped inventory of permittee owned/operated facilities that contribute pollutants to stormwater discharges. The permittee must implement BMPs that prevent or reduce pollutants in stormwater discharges from all inventoried facilities.

Facilities to be inventoried may include, but is not limited to:

- a. composting;
- b. equipment storage and maintenance;
- c. hazardous waste disposal;
- d. hazardous waste handling and transfer;
- e. landfills;
- f. solid waste handling and transfer;
- g. parks;
- h. pesticide storage;
- i. public parking lots;
- j. public golf courses;
- k. public swimming pools;
- l. public works yards;
- m. recycling;
- n. salt storage;
- o. snow storage;
- p. vehicle storage and maintenance (e.g., fueling and washing) yards; and
- q. materials storage yards

21.4 The permittee must implement BMPs that prevent or reduce pollutants in stormwater discharges from the following municipal operations that may contribute pollutants to stormwater discharges, where applicable:

- a. waste disposal and storage, including dumpsters;
- b. management of temporary and permanent stockpiles of materials such as street sweepings, snow, sand and sediment removal piles (e.g., effective sediment controls at the base of stockpiles on the downgradient perimeter);
- c. vehicle fueling, washing, and maintenance;
- d. routine street and parking lot sweeping;
- e. emergency response;
- f. cleaning of maintenance equipment, building exteriors, dumpsters, and the disposal of associated waste and wastewater;
- g. use, storage, and disposal of significant materials;
- h. landscaping, park, and lawn maintenance;
- i. road maintenance, including pothole repair, road shoulder maintenance, pavement marking, sealing, and repaving;
- j. right-of-way maintenance, including mowing; and
- k. application of herbicides, pesticides, and fertilizers

21.5 The permittee must implement the following BMPs at permittee owned/operated salt

storage areas:

- a. cover or store salt indoors;
- b. store salt on an impervious surface; and
- c. implement practices to reduce exposure when transferring material from salt storage areas (e.g., sweeping, diversions, and/or containment)

21.6 The permittee must implement a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee. The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds).

21.7 Each calendar year, the permittee must ensure all individuals that perform winter maintenance activities for the permittee receive training that includes:

- a. the importance of protecting water quality;
- b. BMPs to minimize the use of deicers (e.g., proper calibration of equipment and benefits of pretreatment, pre-wetting, and anti-icing); and
- c. tools and resources to assist in winter maintenance (e.g., deicing application rate guidelines, calibration charts, Smart Salting Assessment Tool). The permittee may use training materials from the Agency's Smart Salting training or other organizations to meet this requirement.

21.8 The permittee must maintain written procedures 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.

21.9 The permittee must inspect structural stormwater BMPs (excluding stormwater ponds, which are under a separate schedule below) each calendar year to determine structural integrity, proper function, and maintenance needs unless the permittee determines either of the following conditions apply:

- a. complaints received or patterns of maintenance indicate a greater frequency is necessary; or
- b. maintenance or sediment removal is not required after completion of the first two calendar year inspections; in which case the permittee may reduce the frequency of inspections to once every two (2) calendar years.

21.10 Prior to the expiration date of the General Permit, the permittee must conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs.

21.11 Based on inspection findings, the permittee must determine if repair, replacement, or maintenance measures are necessary in order to ensure the structural integrity and proper function of structural stormwater BMPs and outfalls. The permittee must complete necessary maintenance as soon as possible. If the permittee determines necessary maintenance cannot be completed within one year of discovery, the permittee must document a schedule(s) for completing the maintenance.

21.12 The permittee must implement a stormwater management training program commensurate with individual's responsibilities as they relate to the permittee's SWPPP, including reporting and assessment activities. The permittee may use training materials from the United States Environmental Protection Agency (USEPA), state and regional agencies, or other organizations as appropriate to meet this requirement.

The training program must:

- a. address the importance of protecting water quality;
- b. cover the requirements of the permit relevant to the responsibilities of the individual not already addressed in items 18.8, 18.9, 19.11, 20.18, and 21.7; and
- c. include a schedule that establishes initial training for individuals, including new and/or seasonal employees, and recurring training intervals to address changes in procedures, practices, techniques, or requirements.

21.13 The permittee must document the following information associated with the operations and maintenance program:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected, for all inspections conducted in accordance with items 21.9 and 21.10;
- b. any adjustments to inspection frequency as authorized in item 21.9;
- c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;
- d. schedule(s) for maintenance of structural stormwater BMPs and outfalls as required in item 21.11; and
- e. stormwater management training events, including general subject matter covered, names and departments of individuals in attendance, and date of each event.

21.14 The permittee must document pond sediment excavation and removal activities, including:

- a. a unique ID number and geographic coordinates of each stormwater pond from which sediment is removed;
- b. the volume (e.g., cubic yards) of sediment removed from each stormwater pond;
- c. results from any testing of sediment from each removal activity; and
- d. location(s) of final disposal of sediment from each stormwater pond. [Minn. R. 7090]

21.15 The permittee must conduct an annual assessment of the operations and maintenance program to evaluate program compliance, the status of achieving the measurable requirements in Section 21, and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., inventory, trainings, inspections, maintenance activities, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Best Management Practices

21.2 Pollution Prevention/ Good Housekeeping Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

(New permittees) Develop and implement...

(Existing permittees) Revise, as necessary, and continue to implement,...

...an operations and maintenance program that prevents or reduces the discharge of pollutants to the MS4 from permittee owned/ operated facilities and operations. Incorporate Section 21 requirements into their program.

Goals

None

Activity Date	Name	Description
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None		
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21.3 Facilities Inventory

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Maintain a written or mapped inventory of permittee owned/ operated facilities that contribute pollutants to stormwater discharges. The permittee must implement BMPs that prevent or reduce pollutants in stormwater discharges from all inventoried facilities.

Facilities to be inventoried may include, but is not limited to:

- a. composting;
- b. equipment storage and maintenance;
- c. hazardous waste disposal;
- d. hazardous waste handling and transfer;
- e. landfills;
- f. solid waste handling and transfer;
- g. parks;
- h. pesticide storage;
- i. public parking lots;
- j. public golf courses;
- k. public swimming pools;
- l. public works yards;
- m. recycling;
- n. salt storage;
- o. snow storage;
- p. vehicle storage and maintenance (e.g., fueling and washing) yards; and
- q. materials storage yards

Goals

21.3.1 MS4 Facilities Inventory

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Prepare and maintain an inventory of facilities currently owned and/ or operated by the MS4 that contribute pollutants to stormwater discharges.

Provide a copy of or link to the completed and updated inventory each reporting period.

Planned: 2021 2022 2023 2024 2025 2026

Complete: 2021 2022 2023

Activity Date	Name	Description
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08/11/2023	2023 MS4 Inspections	
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21.4 BMPs for Municipal Operations

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Develop and implement BMPs that prevent or reduce pollutants in stormwater discharges from the following municipal operations that may contribute pollutants to stormwater discharges, where applicable:

- a. waste disposal and storage, including dumpsters;
- b. management of temporary and permanent stockpiles of materials such as street sweepings, snow, sand and sediment removal piles (e.g., effective sediment controls at the base of stockpiles on the downgradient perimeter);
- c. vehicle fueling, washing, and maintenance;
- d. routine street and parking lot sweeping;
- e. emergency response;
- f. cleaning of maintenance equipment, building exteriors, dumpsters, and the disposal of associated waste and wastewater;
- g. use, storage, and disposal of significant materials;
- h. landscaping, park, and lawn maintenance;
- i. road maintenance, including pothole repair, road shoulder maintenance, pavement marking, sealing, and repaving;
- j. right-of-way maintenance, including mowing; and
- k. application of herbicides, pesticides, and fertilizers.

Goals

21.4.1 Waste Disposal and Storage BMPs

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from waste disposal and storage operations, including dumpsters, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
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None		
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21.4.2 Material Stockpile BMPs

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater resulting from management of temporary and permanent stockpiles of materials such as street sweepings, snow, deicing materials, sand and sediment removal piles, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
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None		
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21.4.3 Vehicle Fueling & Maintenance BMPs

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from vehicle fueling, washing and maintenance operations, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
None		

21.4.4 Street/ Parking Lot Sweeping BMPs

Responsible Staff / Position: Brian Pint
Street Crew Lead
(952) 949-8543

Description

Develop, implement and maintain routine sweeping BMPs to prevent or reduce pollutant discharges to stormwater from streets and parking lots, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete: 2020 2021

Activity Date	Name	Description
12/31/2021	Street Sweeping 2021	The 2021 season had the following results. Lane miles swept = 790 miles Total yards of sweepings collected: Spring/summer = 261 yds of debris Fall = 591 yds of debris

21.4.5 Emergency Response Plans

Responsible Staff / Position: Rik Berkbiger
Assistant Chief of Emergency Management and Health/Safety

Description

Develop, implement and maintain emergency response plans with BMPs to prevent or reduce pollutant discharges to stormwater from spills of pollutants, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current plan as described.

Planned: 2021 2022 2023 2024 2025 2026

Complete: 2021 2022

Activity Date	Name	Description
12/01/2021	Standard Operating Guide: HAZMAT Incidents	The Eden Prairie Fire Department (EPFD) has established these guidelines for firefighter behavior in an effort to protect its firefighters and the interests

21.4.6 Cleaning Activity BMPs

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from cleaning of maintenance equipment, building exteriors, dumpsters and the disposal of associated waste and wastewater, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
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None		
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21.4.7 Significant Material BMPs

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from use, storage and disposal of significant materials, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
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None		
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21.4.8 Landscaping BMPs

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from landscaping, park and lawn maintenance, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
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None		
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21.4.9 Road Maintenance BMPs

Responsible Staff / Position: Brian Pint
Street Crew Lead
(952) 949-8543

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from road maintenance activities, including pothole repair, road shoulder maintenance, pavement marking, sealing and repaving, all considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
None		

21.4.10 Right-of-Way Maintenance BMPs

Responsible Staff / Position: Brian Pint
Street Crew Lead
(952) 949-8543

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from right-of-way maintenance, including mowing, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
None		

21.4.11 Herbicide, Pesticide and Fertilizers

Responsible Staff / Position: Matt Bourne
Parks and Natural Resources Manager
(952) 949-8535

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from use of herbicides, pesticides and fertilizers, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Activity Date	Name	Description
None		

21.4.12 Snow and Ice BMPs

Responsible Staff / Position: Brian Pint
Street Crew Lead
(952) 949-8543

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from cold weather operations, including plowing or other snow removal practices, sand use and application of deicing compounds, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete: 2020 2021

Activity Date	Name	Description
12/31/2021	2021 Salt Use	The following are the results from 2021 salt application: Total miles salted = 16,184 miles Total salt used = 1877.74 tons Treated = 169.67 tons White = 1708.07 tons 0.116 tons/mile
12/31/2022	2022 Salt Use	We had a total of 39 events starting November 14, 2022 through April 1, 2023: • White Salt = 1,859 Tons

- Treated Salt = 183 Tons
 - Total Distance that Spreaders were on = 21,548 Miles
 - Average for the winter of 22-23 = 190 LBS/Mile (0.095 tons/mile)
- The trucks register in LBS/Lane Mile and spreader output is also set using LBS/Lane Mile.

- We used 39,914 gallons of Salt Brine, most of that was used for Prewetting salt at the spreader.
- We also used 3,000 Gallons of Beet Heet additive to go along with our prewet brine. This allows us to use white road salt at lower settings and also helps activate it at lower temps so we don't have to change over to treated salt until the temp drops below zero.

21.4.13 Inventoried Facilities BMPs

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop and implement BMPs that prevent or reduce pollutant in stormwater discharges from facilities currently inventoried and identified, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link for each inventoried facility improvement initiated or completed each reporting period.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete: 2020 2021

Activity Date	Name	Description
None		

21.5 Salt Storage Practices

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Implement the following BMPs at permittee owned/ operated salt storage areas:

- a. cover or store salt indoors;
- b. store salt on an impervious surface; and
- c. implement practices to reduce exposure when transferring material from salt storage areas (e.g., sweeping, diversions, and/or containment).

Goals

21.5.1 Salt Storage Practices

Responsible Staff / Position:

Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Describe permittee's BMPs implemented for permittee owned/ operated salt storage areas and material transfer practices. Review and update, as necessary, annually to maintain permit compliance and effectiveness.

Provide reference to or upload BMPs as described for the reporting period.

Activity Date	Name	Description
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None		
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21.6 Snow and Ice Management Policy

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Develop, Implement and maintain a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee.

The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds).

Goals

21.6.1 Implement Snow and Ice Management Policy

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop and implement a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee. The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds). Review the policy annually and revise as necessary to maintain permit compliance and program effectiveness.

Provide reference to or a copy of the policy as described, and summarize any revisions or updates adopted during the reporting period.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete:

Activity Date	Name	Description
12/01/2020	2020 Winter Maintenance Policy	Addresses: • Commencement of operations • How snow will be plowed • Use of salt • Suspension of operations • Property damage • Driveways • Mail delivery • Complaints • Parking • Placing snow or ice in a public ROW • Priorities • Emergency notification of public works • Snow removal from trails and sidewalks

21.7 Staff Training - Winter Maintenance

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Ensure all individuals that perform winter maintenance activities for the permittee receive training each calendar year that includes:

- the importance of protecting water quality;
- BMPs to minimize the use of deicers (e.g., proper calibration of equipment and benefits of pretreatment, pre-wetting, and anti-icing); and
- tools and resources to assist in winter maintenance (e.g., deicing application rate guidelines, calibration charts, Smart Salting Assessment Tool).

The permittee may use training materials from the Agency's Smart Salting training or other organizations to meet this requirement.

Goals

21.7.1 Develop Winter Maintenance Staff Training Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop a winter maintenance staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.

Provide a copy of or link to the current winter maintenance training program each reporting period.

Activity Date	Name	Description
None		

21.7.2 Conduct Annual Winter Maintenance Staff Training

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct annual winter maintenance staff training.

For each training, document the following:

- general subject matter covered;
- names and departments of individuals in attendance; and
- date of each event.

Activity Date	Name	Description
None		

21.8 Pond Treatment Effectiveness Procedures

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Develop and maintain written procedures 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.

Goals

21.8.1 Develop Procedures

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop and maintain written procedures 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. Review annually and revise as necessary to maintain permit compliance and program effectiveness.

Provide a reference to or copy of the procedures as described each reporting period. Summarize and updates or revisions adopted through the reporting period.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete: 2020 2021

Activity Date	Name	Description
None		

21.9 Pond and Outfall Inspections

Responsible Staff / Position: Engineering Intern
Environmental Intern
(952) 949-8330

Required: Yes

Description

Prior to the expiration date of the General Permit, must conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs.

Goals

21.9.1 Conduct Pond Inspections

Responsible Staff / Position: Engineering Intern
Environmental Intern
(952) 949-8330

Description

Prior to the expiration date of the General Permit, conduct at least one inspection of all ponds to determine structural integrity, proper function, and maintenance needs.

For each pond inspection, record:

- Date(s) and description of findings, including whether or not an illicit discharge is detected
- Date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;

Activity Date	Name	Description
None		

21.9.2 Conduct Outfall Inspections

Responsible Staff / Position: Engineering Intern
Environmental Intern
(952) 949-8330

Description

Conduct at least one inspection of all outfalls (excluding underground outfalls) to determine:

1. Structural integrity,
2. Proper function, and
3. Maintenance needs

For each outfall inspection, record:

- Date(s) and description of findings, including whether or not an illicit discharge is detected
- Date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;
- Schedule(s) for maintenance of outfalls

Activity Date	Name	Description
None		

21.10 Structural Stormwater BMP Inspections

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Inspect structural stormwater BMPs each calendar year to determine structural integrity, proper function, and maintenance needs unless the permittee determines either of the following conditions apply:

- a. complaints received or patterns of maintenance indicate a greater frequency is necessary; or
- b. maintenance or sediment removal is not required after completion of the first two calendar year inspections; in which case the permittee may reduce the frequency of inspections to once every two (2) calendar years.

Goals

21.10.1 Conduct Annual Inspection of Structural Stormwater BMPs

Responsible Staff / Position: Engineering Intern
Environmental Intern
(952) 949-8330

Description

Inspect structural stormwater BMPs each calendar year to determine:

1. Structural integrity
2. Proper function, and
3. Maintenance needs

Document the following information:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected
- b. any adjustments to inspection frequency as authorized in item 21.9;
- c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;

Activity Date	Name	Description
12/30/2022	2022 Sump/Stormceptor Inspections	693 City-owned stormwater sump catch basins and Stormceptor structures were inspected in 2022.

21.10.2 Conduct Special Inspections of Structural Stormwater BMPs

Responsible Staff / Position: Engineering Intern
Environmental Intern
(952) 949-8330

Description

Inspect structural stormwater BMPs on a more frequent than annual basis based on complaints received or patterns of maintenance indicating greater frequency to determine:

1. Structural integrity
2. Proper function, and
3. Maintenance needs

Document the following information:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected
 - b. any adjustments to inspection frequency as authorized in item 21.9;
 - c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;
-

Activity Date	Name	Description
None		

21.10.3 Biannual Structural Stormwater BMP Inspections

Responsible Staff / Position: Engineering Intern
Environmental Intern
(952) 949-8330

Description

Inspect structural stormwater BMPs for which completion of two consecutive annual inspections determine maintenance or sediment removal is not required biannually to determine:

1. Structural integrity
2. Proper function, and
3. Maintenance needs

Document the following information:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected
- b. any adjustments to inspection frequency as authorized in item 21.9;
- c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;

Activity Date	Name	Description
None		

21.11 Maintenance - Structural Stormwater BMPs and Outfalls

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Determine if repair, replacement, or maintenance measures are necessary based on inspection findings to ensure the structural integrity and proper function of structural stormwater BMPs and outfalls. Complete necessary maintenance as soon as possible to prevent or reduce the discharge of pollutants to stormwater. If the necessary maintenance cannot be completed within one year of discovery, document a schedule(s) for completing the maintenance.

Goals

21.11.1 Structural Stormwater BMP and Outfall Maintenance Schedule

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Based on structural stormwater BMP and outfall inspections, develop a schedule for maintenance as required in Permit Section 21.11.

Provide reference to or a copy of the maintenance schedule each reporting period.

Activity Date	Name	Description
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None

21.11.2 Structural Stormwater BMP Maintenance

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.

Provide a description of maintenance conducted, including dates, and whether an illicit discharge was detected, as a result of inspection findings.

Activity Date	Name	Description
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12/30/2022	2022 Sump and Stormceptor Maintenance	Approximately 118 yards of debris were removed from 52 sumps and Stormceptors during maintenance in 2022. An additional 95 that required maintenance did not get it before the end of 2022, but are on the list for 2023.
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21.12 Staff Training - Stormwater Management Program

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Develop and implement a stormwater management training program commensurate with individual's responsibilities as they relate to the permittee's SWPPP, including reporting and assessment activities. The permittee may use training materials from the United States Environmental Protection Agency (USEPA), state and regional agencies, or other organizations as appropriate to meet this requirement.

The training program must:

- a. address the importance of protecting water quality;
- b. cover the requirements of the permit relevant to the responsibilities of the individual not already addressed in items 18.8, 18.9, 19.11, 20.18, and 21.7; and
- c. include a schedule that establishes initial training for individuals, including new and/or seasonal employees, and recurring training intervals to address changes in procedures, practices, techniques, or requirements.

Goals

21.12.1 Develop Stormwater Management Program Training

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop a stormwater management staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.

Provide a copy of or link to the current stormwater management training program each reporting period.

Activity Date	Name	Description
None		

21.12.2 Conduct Annual Stormwater Management Program Staff Training

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct annual stormwater management staff training.

For each training, document the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

Activity Date	Name	Description
None		

21.14 Pond Dredging Documentation

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Required: Yes

Description

Document pond sediment excavation and removal activities, including:

- a. a unique ID number and geographic coordinates of each stormwater pond from which sediment is removed;
- b. the volume (e.g., cubic yards) of sediment removed from each stormwater pond;
- c. results from any testing of sediment from each removal activity; and
- d. location(s) of final disposal of sediment from each stormwater pond.

Goals

21.14.1 Pond Dredging Documentation

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Description

Develop and implement a process for documenting pond dredging activities to include the following:

- a. a unique ID number and geographic coordinates of each stormwater pond from which sediment is removed;
- b. the volume (e.g., cubic yards) of sediment removed from each stormwater pond;
- c. results from any testing of sediment from each removal activity; and
- d. location(s) of final disposal of sediment from each stormwater pond.

Review the process annually and update as necessary to maintain permit compliance and effectiveness.

Include a reference to or copy of the current documentation process and a summary of any updates or revisions completed in the reporting period.

Activity Date	Name	Description
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None

21.14.2 Pond Dredging Reports

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Description

Provide reference to or copies of pond sediment excavation and removal activities through the reporting period as required.

Activity Date	Name	Description
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None

21.15 Stormwater Operation and Maintenance Program Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Conduct an annual assessment of the operations and maintenance program to:

1. Evaluate program compliance,
2. Evaluate the status of achieving the measurable requirements in Section 21, and
3. Determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

Goals

21.15.1 Annual Stormwater Operations and Maintenance Program Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Conduct an annual assessment of the Stormwater Operations and Maintenance Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

Activity Date	Name	Description
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None

21.15.2 Stormwater Operations and Maintenance Program Modifications

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Identify modifications made to the Stormwater Operations and Maintenance Program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

Activity Date	Name	Description
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None

22 TMDLs: Discharge to Impaired Waters

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Description:

22.1 Discharges to Impaired Waters with a USEPA-Approved TMDL that Includes an Applicable WLA.

22.2 If the permittee has an applicable WLA not being met for **oxygen demand, nitrate, TSS, or TP**, the permittee must provide a summary of the permittee's progress toward achieving those applicable WLAs with the annual report.

The summary must include the following information:

- a. a list of all BMPs applied towards achieving applicable WLAs for oxygen demand, nitrate, TSS, and TP;
- b. the implementation status of BMPs included in the compliance schedule at the time of final application submittal; and
- c. an updated estimate of cumulative TSS and TP load reductions.

22.3 If the permittee has an applicable WLA where a reduction in pollutant loading is required for **bacteria**, the permittee must maintain a written or mapped inventory of potential areas and sources of bacteria (e.g., dense populations of waterfowl or other bird, dog parks).

22.4 If the permittee has an applicable WLA where a reduction in pollutant loading is required for **bacteria**, the permittee must maintain a written plan to prioritize reduction activities to address the areas and sources identified in the inventory in item 22.3.

The written plan must include BMPs the permittee will implement over the permit term, which may include, but is not limited to:

- a. water quality monitoring to determine areas of high bacteria loading;
- b. installation of pet waste pick-up bags in parks and open spaces;
- c. elimination of over-spray irrigation that may occur at permittee owned areas;
- d. removal of organic matter via street sweeping;
- e. implementation of infiltration structural stormwater BMPs; or
- f. management of areas that attract dense populations of waterfowl (e.g., riparian plantings).

22.5 If the permittee has an applicable WLA where a reduction in pollutant loading is required for **chloride**, the permittee must document the amount of deicer applied each winter maintenance season to all permittee owned/operated surfaces.

22.6 If the permittee has an applicable WLA where a reduction in pollutant loading is required for **chloride**, each calendar year the permittee must conduct an assessment of the permittee's winter maintenance operations to reduce the amount of deicing salt applied to permittee owned/operated surfaces and determine current and future opportunities to improve BMPs. The permittee may use the Agency's Smart Salting Assessment Tool or other available resources and methods to complete this assessment. The permittee must document the assessment.

The assessment may include, but is not limited to:

- a. operational changes such as pre-wetting, pre-treating the salt stockpile, increasing plowing prior to deicing, monitoring of road surface temperature, etc.;
- b. implementation of new or modified equipment providing pre-wetting, or other capability for minimizing salt use;
- c. regular calibration of equipment;
- d. optimizing mechanical removal to reduce use of deicers; or
- e. designation of no salt and/or low salt zones.

22.7 If the permittee has an applicable WLA where a reduction in pollutant loading is required for **temperature** (i.e., City of Duluth, City of Hermantown, City of Rice Lake, City of Stillwater, MnDOT Outstate, St. Louis County, University of Minnesota - Duluth, and Lake Superior College), the permittee must maintain a written plan that identifies specific activities the permittee will implement to reduce thermal loading during the permit term.

The written plan may include, but is not limited to:

- a. implementation of infiltration BMPs such as bioinfiltration practices;
- b. disconnection and/or reduction of impervious surfaces;
- c. retrofitting existing structural stormwater BMPs; or
- d. improvement of riparian vegetation.

Best Management Practices

22.2 Oxygen Demand, Nitrate, TSS or TP Discharges

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Required: Yes

Description

(If the permittee has an applicable WLA not being met for oxygen demand, nitrate, TSS, or TP)

Provide a summary of the permittee's progress toward achieving those applicable WLAs with the annual report.

The summary must include the following information:

- a. a list of all BMPs applied towards achieving applicable WLAs for oxygen demand, nitrate, TSS, and TP;
- b. the implementation status of BMPs included in the compliance schedule at the time of final application submittal; and
- c. an updated estimate of cumulative TSS and TP load reductions.

Goals

22.2.1 Oxygen Demand, Nitrate, TSS or TP Discharge Summary

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Description

Provide a report summarizing progress toward achieving applicable WLAs each reporting period, including the information required in Permit Section 22.2.

Activity Date	Name	Description
None		

22.4 Bacteria Discharges

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Required: Yes

Description

(If the permittee has an applicable WLA where a reduction in pollutant loading is required for bacteria)

Develop and maintain a written or mapped inventory of potential areas and sources of bacteria (e.g., dense populations of waterfowl or other bird, dog parks) and a written plan to prioritize reduction activities to address the areas and sources identified in the inventory in item 22.3.

The written plan must include BMPs the permittee will implement over the permit term, which may include, but is not limited to:

- a. water quality monitoring to determine areas of high bacteria loading;
- b. installation of pet waste pick-up bags in parks and open spaces;
- c. elimination of over-spray irrigation that may occur at permittee owned areas;
- d. removal of organic matter via street sweeping;
- e. implementation of infiltration structural stormwater BMPs; or f. management of areas that attract dense populations of waterfowl (e.g., riparian plantings).

Goals

22.4.1 Inventory of Potential Bacteria Sources

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Develop and maintain a written or mapped inventory of potential areas and sources of bacteria. Review the inventory annually and update as necessary.

Provide a reference to or copy of the current inventory each reporting period.

Planned: 2022 2023 2024 2025 2026

Complete:

Activity Date	Name	Description
05/12/2022	Identify Potential Bacteria Sources	Met with Matt Bourne regarding potential bacteria sources (i.e., pet waste, geese). Notes attached.
10/14/2022	Source Mapping	Map of off-leash dog exercise areas, sites with known pet waste issues, sites with nuisance geese and golf courses: K:\PUBLIC WORKS\Water Resources\MS4 Maps and Records\ Map of known septic systems: EP Map and cross-referenced at https://gis.hennepin.us/naturalresources/

22.4.2 Bacteria Reduction Plan

Responsible Staff / Position:

Description

Develop and maintain a written plan to prioritize reduction activities to address the areas and sources identified in the inventory in item 22.3.

The written plan must include BMPs the permittee will implement over the permit term, which may include, but is not limited to:

- a. water quality monitoring to determine areas of high bacteria loading;
- b. installation of pet waste pick-up bags in parks and open spaces;
- c. elimination of over-spray irrigation that may occur at permittee owned areas;
- d. removal of organic matter via street sweeping;
- e. implementation of infiltration structural stormwater BMPs; or f. management of areas that attract dense populations of waterfowl (e.g., riparian plantings).

Provide a reference to or copy of the current plan, including any updates or revisions completed, each reporting period.

Activity Date	Name	Description
10/14/2022	Bacterial Reduction Plan	Bacterial reduction plan for lower Riley Creek and Lower Purgatory Creek, which references goose management document.

22.5 Chloride Discharges

Responsible Staff / Position: Patrick Sejkora
Water Resources Engineer
(952) 949-8360

Required: Yes

Description

(If the permittee has an applicable WLA where a reduction in pollutant loading is required for chloride)

Document the amount of deicer applied each winter maintenance season to all permittee owned/operated surfaces each year and conduct an annual assessment of the permittee's winter maintenance operations to reduce the amount of deicing salt applied to permittee owned/operated surfaces and determine current and future opportunities to improve BMPs. The permittee may use the Agency's Smart Salting Assessment Tool or other available resources and methods to complete this assessment. The permittee must document the assessment.

The assessment may include, but is not limited to:

- a. operational changes such as pre-wetting, pre-treating the salt stockpile, increasing plowing prior to deicing, monitoring of road surface temperature, etc.;
- b. implementation of new or modified equipment providing pre-wetting, or other capability for minimizing salt use;
- c. regular calibration of equipment;
- d. optimizing mechanical removal to reduce use of deicers; or
- e. designation of no salt and/or low salt zones.

Goals

22.5.1 Deicer Use Documentation

Responsible Staff / Position:

Description

Provide a reference to or copy of documentation the amount of deicer applied each winter maintenance season to all permittee owned/operated surfaces.

Activity Date	Name	Description
None		

22.5.2 Annual Winter Operations Assessment of Deicer Application

Responsible Staff / Position:

Description

Document the annual assessment as described. Include a reference to or copy of the current annual assessment, including all the requirements listed in Permit Section 22.6.

Activity Date	Name	Description
None		

25 Annual SWPPP Assessment Reporting

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description:

25.1 Annual Assessment, Annual Reporting, and Recordkeeping.

25.2 The permittee must conduct an annual assessment to evaluate compliance with the terms and conditions of the General Permit, including the effectiveness of the components of the SWPPP and the status of achieving the measurable requirements in the General Permit. Measurable requirements are activities that must be documented or tracked (e.g., education and outreach efforts, implementation of written plans, inventories, trainings, site plan reviews, inspections, enforcement, etc.).

The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the SWPPP as a result of the annual assessment.

25.3 The permittee must submit an annual report : Due annually, by the 30th of June. The annual report must cover the portion of the previous calendar year during which the permittee was authorized to discharge stormwater under the General Permit.

The annual report shall be submitted to the Agency, in a manner determined by the Agency, that includes but is not limited to:

- a. the status of compliance with permit terms and conditions, including an assessment of the appropriateness of BMPs identified by the permittee and progress towards achieving the measurable requirements of each of the MCMs. The assessment must be based on results of information collected and analyzed, including monitoring (if any), inspection findings, and public input received during the reporting period;
- b. the stormwater activities the permittee plans to undertake during the next reporting cycle;
- c. a change in any identified BMPs for any of the MCMs;
- d. the summary required in item 22.2 to demonstrate progress toward achieving applicable WLAs;
- e. information required to be recorded or documented in Sections 13 through 24; and
- f. a statement that the permittee is relying on a partnership(s) with another regulated small MS4(s) to satisfy one or more permit requirements (if applicable), and what agreements the permittee has entered into in support of this effort.

25.4 The permittee must make records, including components of the SWPPP, available to the public at reasonable times during regular business hours (see 40 CFR 122.7 for confidentiality provision).

25.5 The permittee must retain copies of the permit application, all documentation necessary to comply with SWPPP requirements, all data and information used by the permittee to complete the application process, and any information developed as a requirement of the General Permit or as requested by the Commissioner, for a period of at least three (3) years beyond the date of permit expiration. This period is automatically extended during the course of an unresolved enforcement action regarding the small MS4 or as requested by the Commissioner.

25.6 The permittee must, when requested by the Commissioner, submit within a reasonable time the information and reports that are relevant to the control of pollution regarding the construction, modification, or operation of the facility covered by the General Permit or regarding the conduct of the activity covered by the General Permit.

The permittee must use an electronic submittal process, as provided by the Agency, to submit information required by the General Permit. If electronic submittal is not available, the permittee must use the following mailing address:

Supervisor, Municipal Stormwater Unit
Minnesota Pollution Control Agency
520 Lafayette Road
North St. Paul, Minnesota 55155-4194

Best Management Practices

25.2 Annual SWPPP Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Conduct an Annual Assessment of the **SWPPP** to determine program compliance, the appropriateness of **BMPs**, and progress towards achieving the measurable goals identified in the **SWPPP** document prior to completion of each Annual Report.

Goals

25.2.1 Annual SWPPP Assessment

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide reference to or a copy of the annual assessment report as required.

Planned: 2021 2022 2023 2024 2025 2026

Complete:

Activity Date	Name	Description
None		

25.3 Annual Report

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Submit an Annual Report to the Agency by June 30th of each calendar year for the portion of the previous calendar year during which the permittee was authorized to discharge stormwater under this permit and meeting all the conditions and requirements of Permit Section 25.3.

Make records, including components of the SWPPP, available to the public at reasonable times during regular business hours (see 40 CFR 122.7 for confidentiality provision).

Goals

25.3.1 Annual Report

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Provide a reference to or copy of the Annual Report as filed each reporting period. Identify how the permittee meets public access requirements for the annual reports, including components of the SWPPP, available to the public as required.

Planned: 2020 2021 2022 2023 2024 2025 2026

Complete: 2020 2021

Activity Date	Name	Description
06/21/2021	2020 MS4 Annual Report	
06/20/2022	2021 MS4 Annual Report	
01/12/2023	2022 MS4 Annual Report	According to the MPCA, a 2022 annual report will not be required until the 2023 (or 2024) annual report is due. The MPCA is replacing the reporting software and will need time to develop and implement it.

25.4 Public Access

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Required: Yes

Description

Make records, including components of the SWPPP, available to the public at reasonable times during regular business hours (see 40 CFR 122.7 for confidentiality provision).

Goals

25.4.1 Public Access to Records

Responsible Staff / Position: Lori Haak
Water Resources Coordinator
(952) 949-8327

Description

Confirm public access to records, including components of the SWPPP with a description of methods of access and hours of availability as required.

Planned: 2021 2022 2023 2024 2025 2026

Complete:

Activity Date	Name	Description
None		
