



Minnesota Pollution Control Agency

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

MS4 SWPPP Application for Reauthorization

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

Doc Type: Permit Application

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

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

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

General Contact Information (*Required fields)

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

*MS4 permittee name: City of Rochester *County: Olmsted
(city, county, municipality, government agency or other entity)
*Mailing address: Public Works Department; 201 4th St SE, Room 108
*City: Rochester *State: MN *Zip code: 55904
*Phone (including area code): 507/328-2425 *E-mail: bhuberty@rochestermn.gov

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

*Last name: Huberty *First name: Barbara
(department head, MS4 coordinator, consultant, etc.)
*Title: Environmental and Regulatory Affairs Coordinator
*Mailing address: 201 4th St SE, Room 108
*City: Rochester *State: MN *Zip code: 55904
*Phone (including area code): 507/328-2425 *E-mail: bhuberty@rochestermn.gov

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

Last name: _____ First name: _____
(department head, MS4 coordinator, consultant, etc.)
Title: _____
Mailing address: _____
City: _____ State: _____ Zip code: _____
Phone (including area code): _____ E-mail: _____

Verification

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

Certification (All fields are required)

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

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

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

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

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

Name: Barbara J. Huberty

(This document has been electronically signed)

Title: Environmental and Regulatory Affairs Coordinator Date (mm/dd/yyyy): 12/29/13

Mailing address: 201 4th St SE, Room 108

City: Rochester State: MN Zip code: 55904

Phone (including area code): 507/328-2425 E-mail: bhuberty@rochestermn.gov

Note: *The application will not be processed without certification.*

Stormwater Pollution Prevention Program Document

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

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

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved

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

The City of Rochester does not have executed partnership agreements with other regulated MS4s to satisfy requirements of the MS4 permit. The City does, however, work collaboratively with other MS4s and with other organizations within the Rochester Urbanizing Area as opportunities arise on topics of mutual interest that advance the SWPPP goals. For example, the City has developed relationships with local radio, TV, and print media outlets (e.g. newspapers and magazines) such that many press releases result in media coverage, including interviews. We collaborate with the local school district's Summer of Service program to provide service learning opportunities related to water quality. Local garden groups (e.g., Master Gardener's, Rochester Garden and Flower Club, etc.) help promote rain gardens and native landscaping via garden tours, sharing brochures, and hosting presentations. Local environmental groups (e.g., Master Naturalists, Audubon Society, etc.) help broadcast information about upcoming storm water events. Individual volunteers are recruited to participate in appropriate activities as they arise, such as: monitoring lakes and streams, collecting litter, adopting storm water ponds, collecting native seeds, planting floating wetlands, and hosting raingarden parties. The Quarry Hill Nature Center integrates pollution prevention messages into their 4th grade aquatics unit and is the site of a demonstration raingarden and a "Water Story" interpretive trail. The Cascade Meadow Wetlands & Environmental Science Center (CMWESC) is home to City-provided, museum quality indoor and outdoor storm water exhibits, as well as indoor water supply, wastewater, water utility, and watershed exhibits and brochure kiosks. CMWESC also displays indoor and outdoor wetland exhibits and is a destination for continuing water education events, some of which are developed by the City. RNeighbors (Rochester's Neighborhood Resource Center) utilizes its web site and social media outlets to share storm water news, articles, and promote events; they are also a key logistical sponsor for the annual "Help Make Rochester A Litter Bit Better!" litter collection event and they coordinate the RNeighbors unit in the Rochester Fest parade, at which we distribute litter bags. The County's Community Work Service team periodically completes litter collection activities and reports their efforts. Rochester Area Builders provides newsletter space for construction and development related storm water articles and promotes training opportunities provided by the City. The Zumbro Watershed Partnership also facilitates educational programming at CMWESC, currently facilitates an annual rain barrel sale, and is in the process of identifying the 50 worst sedimentation sites in the watershed. When feasible, as with the current South Branch Cascade Creek stream restoration and upland retention project, the City works with Olmsted County (particularly the Soil and Water Conservation District) to seek grant funding for storm water related projects

These collaborations succeed when: productive working relationships with key contacts are sustained, activities that benefit the goals of each party are identified, opportunities to advance common goals are funded, and the City has the capacity and expertise to fill the desired roles. The City's continued involvement in programs and activities led by external entities is dependent on their desire to continue leading them and including the City as a collaborator.

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

Illicit discharges

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

1. If yes:

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

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

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

Citation:

Rochester Code of Ordinances, Chapter 76, Supervision and Control of Sewers

Direct link:

<http://www.rochestermn.gov/departments/attorney/ordinances/pdf/ORD76.pdf>

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

2. If no:

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

The City has used the aforementioned ordinance when dealing with illicit discharge issues since 2003 and it has adequately addressed the encountered illicit discharge situations. However, with the new example permit application, the MPCA has identified several criteria it expects to see in an illicit discharge ordinance. Therefore, the City will draft new ordinance language to address those criteria and bring it to the City Council with a recommendation for adoption within the first 12 months after the permit term has been authorized. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan on www.rochesterstormwater.com for more information.

Construction site stormwater runoff control

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

1. If yes:

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

- Ordinance Contract language
 Policy/Standards Permits
 Rules
 Other, explain: ESC Inspection SOPs (two types)

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

Citation:

A. *Rochester Code of Ordinances Chapter 50*

B. *The City of Rochester Zoning Ordinance and Land Development Manual*

C. *City of Rochester Grading Checklists*

D. *City of Rochester Engineering Standards and Detail Plates*

E. *City of Rochester Erosion and Sediment Control Standard Operating Procedures*

Direct link:

A. <http://www.rochestermn.gov/departments/attorney/ordinances/pdf/ORD50.pdf>

B. http://www.rochestermn.gov/departments/planning_zoning/pdf/CityLDM02102011.pdf

C. http://www.rochesterstormwater.com/businesses/bus_development.asp

D. <http://www.rochestermn.gov/departments/publicworks/specsandstandards/index.asp>

E. http://www.rochesterstormwater.com/permits_plans/permitplans_permits.asp

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

convention: MS4NameHere_CSWreg.

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

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

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

The City will need to evaluate its current ordinances with ESC provisions and determine whether additional requirements will need to be adopted to address the new "at least as stringent as" MS4 permit requirement. If new ordinance language is needed, draft language will be brought to the City Council with a recommendation for adoption within the first 12 months after the permit term has been authorized. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan on www.rochesterstormwater.com for more information.

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

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

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

The City's grading plan checklists will be updated within 12 months of the date permit coverage is authorized to add provisions for site inspections and records of rainfall events, BMP maintenance, and management of solid and hazardous waste on each project site. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan on www.rochesterstormwater.com for more information.

Post-construction stormwater management

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

Yes No

1. If **yes**:

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

- | | |
|--|--|
| <input checked="" type="checkbox"/> Ordinance | <input type="checkbox"/> Contract language |
| <input checked="" type="checkbox"/> Policy/Standards | <input type="checkbox"/> Permits |
| <input type="checkbox"/> Rules | |
| <input type="checkbox"/> Other, explain: _____ | |

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

Citation:

- A. Rochester Code of Ordinances Chapter 35
- B. Rochester Code of Ordinances Chapter 50
- C. The City of Rochester Zoning Ordinance and Land Development Manual
- D. City of Rochester Grading Checklists
- E. City of Rochester Engineering Standards and Detail Plates

Direct link:

- A. <http://www.rochestermn.gov/departments/attorney/ordinances/pdf/ORD35.pdf>

B. <http://www.rochestermn.gov/departments/attorney/ordinances/pdf/ORD50.pdf>

C. http://www.rochestermn.gov/departments/planning_zoning/pdf/CityLDM02102011.pdf

D. http://www.rochesterstormwater.com/businesses/bus_development.asp

E. <http://www.rochestermn.gov/departments/publicworks/specsandstandards/index.asp>

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

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

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. Yes No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
 - a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: Yes No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
 - b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: Yes No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
 - a. Limitations
 - 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: Yes No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: Yes No
 - a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
 - 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. Yes No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any

stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

- a. Mitigation project areas are selected in the following order of preference: Yes No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
 - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Yes No
 - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. Yes No
 - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. Yes No
 - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. Yes No
 - f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). Yes No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. Yes No
 - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. Yes No
 - c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. Yes No

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

The City's existing post-construction program does not address the new requirements of the 2013 MS4 permit requirements. Therefore the City will update its ordinances within 12 months of the date permit coverage is authorized to address the new requirements. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan on www.rochesterstormwater.com for more information.

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

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

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

The enforcement mechanisms currently utilized by the City will need to be formalized as written procedures for all enforcement areas within 12 months of the date permit coverage is authorized to meet the new ERPs requirement. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan on www.rochesterstormwater.com for more information. .

B. Describe your ERPs:

Our current process is initiated either via complaints or routine inspections. The first step is to document the deficiencies discovered in the field, notify the owner (and operator when appropriate) of the deficiency and suggest options to correct the problem. Depending on the problem type and source, this initial communication may be a letter of notification or a stop work warning. If the problem still exists after a re-inspection, then the property owner is issued a Stop Work Order or Correction Order (depending on whether the site is idle), with a compliance schedule. If the corrective actions are not completed in the timeframe noted, the issue is referred to the City Attorney's office to initiate criminal or civil actions (depending on the type of violation). For new residential and commercial construction, withholding building inspections is sometimes used as an enforcement tool. Also, referrals to MPCA are made in situations where additional leverage is needed.

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

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

The City maintains several GIS layers that identify the locations and attributes of its storm water management system, including: storm sewers and their associated point features (e.g., catch basins, manholes, blind ties, etc.), outfalls, storm water ponds, other storm water BMPs, and DNR's "public waters" data. Numerous other data layers are also available on our GIS system to evaluate site specific conditions as they may relate to storm water (e.g., wellhead protection areas, wetland areas, floodplains, geology, soils, etc.).

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

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

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

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

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

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

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

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

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

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

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

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

A. MCM1: Public education and outreach

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

The City's current Public Education and Outreach program has included the collaborative activities described in Section I.B above and the BMPs described in the "Established BMP categories and Measurable goals and timeframes" table, below. Additionally, the City periodically constructs storm water management facilities that also serve as public demonstration sites (e.g., the Silver Lake buffer, green infrastructure at Public Works Transit and Operations Center, stream restoration at Quarry Hill Park, etc.). Summaries of past educational efforts can be found in the annual presentations and the annual reports posted at: www.rochesterstormwater.com, along with the City's general education plan for this new MS4 permit. The City's high priority focus during the new permit will continue to be educating individuals about actions they can take to protect water quality, including: litter and waste management, retaining the rain (e.g., raingardens, native landscaping, tree planting, rain barrels, etc.), and property management activities (e.g., lawn clipping and leaf management, proper chemical use and deicing methods, pet waste management, and vehicle care).

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

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

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

Established BMP categories	Measurable goals and timeframes
Rochester Urbanizing Area Collaborative Education Program	RUA MS4s were invited to participate in a collaborative effort to inventory each groups' pertinent, existing educational materials, identify educational gaps regarding topics of mutual interest, establish a plan to fill those gaps, and develop materials or training for each MS4 to then distribute independently. Measures tracked each year included an established plan, completed educational materials that filled identified gaps, and each MS4s' tracking the # of items distributed and # of employees trained. This item was completed in April 2011 and will be discontinued, as it is now the responsibility of each MS4 to continue outreach efforts using the materials provided.
Distribute General Storm Water Key Messages	The City developed general storm water messages, including individual actions to protect water quality, that were distributed via verbal, written, and visual formats to the general public and various target audience using a variety of methods, such as: brochures, press releases, posters, direct mailings, presentations, articles, utility communications, email notices, web sites, traditional and social media outlets, curricula, and a compendium of Rochester-relevant water information. Requests for presentations, planned programs with collaborators, seasonal conditions, and teachable moments all generated opportunities to distribute these messages using the methods outlined above throughout each year of the permit term. Measures tracked each year included completed educational materials/topics covered, audience type(s), and the # of recipients. This item will be continued in the next permit term according to the general education plan schedule (posted at

<p>Encourage Public Participation</p>	<p>www.rochesterstormwater.com).</p> <p>In addition to the education techniques described above, the City urges citizens to actively engage in storm water management by:</p> <ol style="list-style-type: none"> 1. Providing input on the SWPPP at the annual public meeting or any other intake method, 2. Reporting storm water incidents using the storm water customer service line, emails, and web site portals, and 3. Participating in related programs administered by other governmental agencies (e.g., Adopt-a-Programs led by MPCA, DNR, Olmsted County, etc.), 4. Participating in programs led by the City (e.g., A Litter Bit Better! Realize Raingardens Rochester, Arbor Day, etc.), and 5. Participating in programs led by other non-governmental organizations (e.g., ISD 535, ZWP, Mater Gardeners, etc.). 6. Recruiting and recognizing volunteers. <p>Measures tracked each year included the # of attendees and comments shared at the annual meeting, # of incident reports received, and # of attendees at events led by the City, other agencies, and non-governmental organizations. This item will be continued in the next permit term according to the general education plan schedule (posted at www.rochesterstormwater.com).</p>
<p>Illicit Discharge Key Messages</p>	<p>The City developed key messages about illicit discharge detection and reporting and distributed them to the general public using a utility bill insert/brochure. A restaurant specific brochure was developed and distributed to hospitality businesses. Both were also posted on the City's storm water web site for continuous access. A standard operating procedure was developed for City employees and key personnel were trained in its implementation. Information about reporting illicit discharges is posted on the storm water web site for the general public and contained in the new employee orientation presentation.</p> <p>Measures tracked each year included completed brochures and SOP, along with the # of recipients and trainees. The # of illicit discharge complaints is also tracked. This item will be merged with Erosion and Sediment Control and Post-Construction outreach as a unified technical education category for City employees and related business professionals in the next permit term according to the general education plan schedule (posted at www.rochesterstormwater.com).</p>
<p>Erosion and Sediment Control Key Messages</p>	<p>The City developed key messages about erosion and sediment control and distributed them to construction industry professionals using the Rochester Area Builders newsletter and emails, training courses, and direct mailings.</p> <p>Measures tracked each year included completed articles and other educational materials (e.g., handouts, training presentations, etc.), # of recipients/viewers/attendees. This item will be merged with Illicit Discharges and Post-Construction outreach as a unified technical education category for City employees and related business professionals in the next permit term according to the general education plan schedule (posted at www.rochesterstormwater.com).</p>
<p>Post-Construction Storm Water Management Key Messages</p>	<p>The City communicates its grading, drainage, storm water management standards and processes to the development community, including information about BMP selection, design, construction and maintenance. This information is posted on the City's Public Works and storm water web sites, shared via workshops, communicated via Rochester Area Builder newsletter articles and emails, and delivered via person-to-</p>

person meetings and documentary transmittals during the development review process.

Measures tracked each year included completed development-related standards and process documents, workshop materials, and newsletter articles, along with the # of recipients/attendees/viewers. This item will be merged with Illicit Discharges and Erosion and Sediment Control outreach as a unified technical education category for City employees and related business professionals in the next permit term according to the general education plan schedule (posted at www.rochesterstormwater.com).

BMP categories to be implemented

Measurable goals and timeframes

Employee and Business Technical Education

In addition to retaining information about pollution sources and reporting for the general public on the storm water web site, the City will distribute key technical messages regarding illicit discharges, erosion and sediment control, post-construction storm water management, and good housekeeping to applicable target audiences. In addition to utilizing existing outreach materials, the City will develop new materials, as needed to fill information gaps created by the new permit requirements. Target audiences will include City employees with applicable job duties and businesses associated with each of the above listed topic categories. Outreach methods appropriate to each target audience will be selected, including methods such as: protocols, brochures, posters, presentations, and articles.

Measures to be tracked each year include prepared training materials, along with the # of recipients/attendees. The schedule for distribution is as outlined in the general education plan schedule (posted at www.rochesterstormwater.com).

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

Megan Moeller, Storm Water Educator, Rochester Public Works Department

B. MCM2: Public participation and involvement

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

The City published an annual public meeting notice in the local paper 30 days prior to the annual meeting, which was held at a City Council meeting. The meeting notice was also distributed to area agency staff for their information and further sharing. A description of the meeting was published in the Council's agenda packet. A presentation was made that highlighted the prior calendar year's accomplishments and attendees were offered the opportunity to comment on the program, verbally and in writing. Staff then considered the input received and determined whether revisions to the SWPPP were warranted based as a result of the feedback.

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

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

Established BMP categories

Measurable goals and timeframes

Annual Public Meeting

The City made annual presentations summarizing the prior year's permit activities at a City Council meeting, as described in B.1, above.

Measures tracked each year included copies of notices, # of notices sent to distribution list, annual presentation, # of attendees, # of comments, determination re: SWPPP

modifications. This item will be continued in the next permit term, to be completed prior to the submittal of each annual report to MPCA.

BMP categories to be implemented	Measurable goals and timeframes
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3. Do you have a process for receiving and documenting citizen input? Yes No

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

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

Barb Huberty, Environmental and Regulatory Affairs Coordinator, Rochester Public Works Department

C. MCM 3: Illicit discharge detection and elimination

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

The City completed dry weather inspections of 20% of its outfalls per year. Where discharges were occurring at the time of inspection, no further action was taken at sites with continuous ground water flow (Decorah or till edge seeps) or other approved discharges (e.g., non-storm water discharges or discharges authorized by industrial wastewater or storm water permits). For remaining discharges, the City identified the source, if possible and worked with the property owner to eliminate it. The City also responded to reports of discharges; if source identification was possible, worked with the responsible party to cease and discontinue the practice leading to the discharge. See the "Established BMP categories and Measureable goals and timeframes" table below for more details about the City's current MCM 3 program.

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

- a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). Yes No
- b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. Yes No
- c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. Yes No
- d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. Yes No
- e. Procedures for the timely response to known, suspected, and reported illicit discharges. Yes No
- f. Procedures for investigating, locating, and eliminating the source of illicit discharges. Yes No
- g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. Yes No
- h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). Yes No

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

2.a. Under the new permit, illicit discharge inspections will need to be expanded beyond the outfall inspections to include all inspection and maintenance activities. Within 12 months of the date permit coverage is extended, the IDDE SOP will be updated to include this addition and affected staff will be trained accordingly. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan and the Employee and Business Technical Education section of the general education plan (both posted at www.rochesterstormwater.com).

2.c. In 2004, all City staff were introduced to the new storm water permit and what actions they could take at work and at home to help reach the permit goals. Similarly, this topic is included in new employee orientation, as well. Employee training since then has been targeted to specific groups in response to permit or program changes or operational needs.

Comprehensive training of all field staff related to IDDE will need to be programmed once permit coverage is extended. See the Year 1 Development Plan and the Employee and Business Technical Education section of MCM 1 for more details.

2.d. The City has mapped the locations of Industrial Stormwater and Wastewater permittees and their associated outfalls as priority areas, but has not mapped the following: locations of other types of facilities that are likely to have illicit discharges, locations of past illicit discharges, and areas with storage of large quantities of significant materials that could result in an illicit discharge. Within 12 months of the date permit coverage is extended, the City will create an IDDE layer in GIS that identifies the locations of these three additional categories in conjunction with the source water protection hot spots effort identified in the Employee and Business Technical Education section of the general education plan posted at www.rochesterstormwater.com.

2.h. City staff follow a notification - education - mitigation sequence as a precursor to enforcement under Ch. 76.03, however the City lacks a written enforcement response protocol. Within 12 months of the date permit coverage is extended, the City will prepare a written ERP for responding to illicit discharges. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan (www.rochesterstormwater.com) for more details on the development of ERPs.

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

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

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

Established BMP categories	Measurable goals and timeframes
Illicit Discharge Detection and Elimination Standard Operating Procedure	<p>The City developed a comprehensive IDDE SOP, that included assembling a cross-departmental team of City staff to assess and identify non-storm water discharges. The SOP was disseminated to affected staff for implementation.</p> <p>Measures tracked included a completed SOP and # of staff trained; this task was completed in March 2010 and only annual reviews/updates will be continued through the new permit term.</p>
Illicit Discharge Complaint Response and Investigation	<p>The City utilized multiple methods for receiving complaints about illicit discharges (e.g, phone calls, emails, web portal reports), completed field investigations to try and identify the source, and where the source was identified, worked with the generator to cease the causal process and identify methods to prevent reoccurrences.</p> <p>Measures tracked annually through the permit term included # of calls, # of sources identified, and # of corrections; this activity will continue in the next permit term.</p>
Dry Weather Inspections of 20% of Outfalls Each Yr	<p>City staff completed field inspection of at least 20% of outfalls each year during dry weather periods, documenting discharges and their sources (if any). Any maintenance needs identified were assembled into work orders for repair by Maintenance staff.</p> <p>Measures tracked annually through the permit term included # of outfalls inspected and # of work orders issued and completed; this activity will continue in the next permit term.</p>
Water Quality Protection Program	<p>The City obtained a one-time sales tax legislation to subsidize the extension of City sanitary sewer and water to older subdivisions outside the City with failing septic systems to prevent surface and groundwater contamination; this program was named the Water Quality Protection Program (WQPP).</p> <p>Measures tracked annually through the permit term included the # of petitions, # of new sanitary sewers in petition areas, and the # of WQPP sewer connections. This funding has been exhausted and the last new sewer extension to a WQPP subdivision was completed in 2013; therefore, this program will</p>

	<p>not be continued the next permit term. [Note: the regular annexation process is the avenue by which new and existing property owners can request to be served with City sewer and water, at their own expense.]</p>
Provide Sanitary Pump-Out Stations for RVs	<p>As a means of discouraging illicit dumping of RV waste, the City provides a sewage pump out station for RVs at the Water Reclamation Plant at no charge.</p> <p>Measures tracked annually through the permit term included an estimate of the # of gallons received based on donations made at the pump out station; this service will continue for the next permit term.</p>
Televising Sanitary and Storm Sewers	<p>The City televised about 10% of its sanitary sewers each year to look for and correct leaks, obstructions and cross-connections in order to reduce the potential for discharges of sanitary sewage to surface and groundwater. They also televised newly constructed storm sewers to insure correct construction and the absence of cross-connections. They also televised storm sewers in areas slated for reconstruction to determine whether replacement was warranted.</p> <p>Measures tracked annually through the permit term included the # of ft of sewer televised; this effort will continue for the next permit term.</p>
Respond to Reports of Sanitary Sewer Overflows	<p>The City responds as quickly as possible to reports of sanitary sewer overflows (SSOs) to capture overflows, where possible, to identify the cause and to take corrective actions (typically the removal of obstructions). Situations meeting the reporting thresholds are referred to the State Duty Officer,</p> <p>Measures tracked annually through the permit term included the # of SSO responses, an estimated # of gallons discharged, and documentation of the causes (if determined) and the corrective actions taken; this effort will continue for the next permit term.</p>
Plumbing Inspections	<p>If cross-connections between the sanitary and storm sewer systems are identified during City Building Safety plumbing inspections, they worked with the property owners to eliminate the cross-connection.</p> <p>Measures tracked annually through the permit term included the # of cross-connections identified and corrected; although no cross-connections were found during the last permit term, this practice will be kept in place for the next permit term.</p>
No Dumping Signage	<p>When the City received reports of chronic illegal dumping in any given area, "no dumping" signage was installed.</p> <p>Measures tracked annually through the permit term included the # of new signs posted; although these incidents have essentially evaporated due to the annual "A Litter Bit Better!" program, this practice will be kept in place for the next permit term.</p>
Wastewater Inspections	<p>Staff from the Rochester Water Reclamation Plant completed annual inspections of industries with wastewater pre-treatment permits. If any illicit discharges were observed at that time, staff would work with the property owner to implement corrective actions.</p> <p>Measures tracked annually through the permit term included the # of instances identified and corrected; although this practice did not yield reports during the last permit term, this practice will be kept in place for the next permit term.</p>
Fire Department Hazardous Materials Inspections	<p>Staff from the Rochester Fire Department completed inspections of businesses with hazardous materials</p>

	<p>management permits. If any illicit discharges were observed at this time, staff would work with the property owners to implement corrective actions.</p> <p>Measures tracked annually through the permit term included the # of incidents identified and corrected; although this practices did not yield reports during the last permit term, this practice will be kept in place for the next permit term.</p>
Fire Department Hazardous Material Spill Responses	<p>Staff from the Rochester Fire Department responded to reports of spills of hazardous materials, including vehicle accidents. At each incident, they worked independently or with others to contain and/or clean up the spills.</p> <p>Measures tracked annually through the permit term included the # of spill responses; this effort will continue for the next permit term.</p>
BMP categories to be implemented	Measurable goals and timeframes
IDDE SOP Annual Review/Update	<p>Each year, staff will review the IDDE SOP and, if needed, make updates to it. If changes are made, they will be communicated to affected staff.</p> <p>Measures to track annually through the permit term include a completed review, an updated SOP (if needed), and the # employees informed of any changes (if any).</p>
Ordinance Update	<p>Staff will update the City ordinances to include new provisions to regulate illicit discharges, including the following criteria: prohibition of non-storm water discharges to MS4 or watercourses, definitions for storm water, non-storm water, illicit discharge and illicit connection, prohibition exemptions, authority for access to inspect/monitor sites, and authority for enforcement.</p> <p>The ordinance revisions will be completed within the first year of the permit term and the measures will be the completed ordinance and its presentation to the City Council for adoption.</p>
Prepare Enforcement Response Procedures for MCM 3	<p>Staff will review the current IDDE SOP and extract the enforcement response mechanisms so that a written ERP can be prepared that includes observation and reporting by all field staff completing inspections and maintenance.</p> <p>The ERP for MCM 3 will be completed within the first year of the permit term and the measure will be written procedures.</p>

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? Yes No
- If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

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

Mike Kraszewski, Storm Water Compliance Specialist, Rochester Public Works

Barb Huberty, Environmental and Regulatory Affairs Coordinator, Rochester Public Works

D. MCM 4: Construction site stormwater runoff control

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

For sites requiring an MPCA Construction Storm Water Permit, the City has trained and certified several staff to inspect residential development sites (General Development Plan [GDP] sites), commercial development sites (Site Development Plan [SDP] sites) and individual residential lots to confirm the effectiveness of erosion and sediment control BMPs. All active sites are inspected during the construction season by City staff. Further details are provided in the "Established

BMP categories and Measurable goals and timeframes" table below.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? Yes No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? Yes No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? Yes No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? Yes No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? Yes No
 - 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? Yes No
 - 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? Yes No
 - e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? Yes No
 - f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? Yes No
 - g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? Yes No

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

d.1) *Our inspection program does not include priority sites for inspection because we inspect 100% of all active construction sites each construction season.*

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

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

Established BMP categories	Measurable goals and timeframes
Manage City Projects	<p>For City projects requiring an MCPA construction storm water permit, the project managers reviewed plans and specifications to insure that adequate ESC provisions were included, as per the City's ESC SOPs, standards and ordinances, as well as the standards set forth in the CSW permit. The hired contractors obtained and implemented the CSW permits. ESC requirements were discussed at the pre-construction meeting and subsequent progress meetings. The hired contractors performed ESC inspections and other duties to maintain compliance with the CSW permit. The City's construction inspector assigned to the project reviewed the contractor's activities, including their completed ESC inspections during the construction phase, communicating deficiencies to the contractors and working with the contractor to resolve them. If additional leverage was needed, contract provisions were implemented to correct deficiencies.</p> <p>Measures tracked annually through the permit term included the # of ESC inspections/project and the # of contract enforcement actions; this effort will continue for the next permit term.</p>
ESC and Waste Management Inspections for Non-City Projects	<p>For non-City projects, the project owners and their contractors were responsible for MPCA CSW permit compliance. City staff</p>

	<p>also completed ESC inspections during the construction phase following the City's ESC SOP, standards and ordinances, as well as the standards set forth in the CSW permit for GDP, SDP and individual lot sites. They prepared and distributed inspection reports and worked with owners and contractors to resolve deficiencies. If needed, they utilized enforcement action tools to correct deficiencies. These inspections included an assessment of the adequacy of on-site waste management BMPs. In addition, contractors were able to utilize a City-provided erosion and sediment control software program to manage their own ESC inspection notification and tracking activities.</p> <p>Measures tracked annually through the permit term included the # of ESC inspections and the # of enforcement actions; this effort will continue for the next permit term.</p>
Plan Review	<p>City staff followed existing procedures and utilized existing tools (e.g., grading checklists) to review and approve site development plans, general development plans, drainage reports, and grading plans to insure adequate ESC was planned for construction sites.</p> <p>Measures tracked annually through the permit term included the # of plans reviewed; this effort will continue for the next permit term.</p>
ESC Complaint Response	<p>City staff responded to ESC complaints received by phone, emails and the web portal; staff conducted follow-up inspections and worked with the property owner, manager, or contractor to resolve deficiencies, utilizing enforcement action tools where needed.</p> <p>Measures tracked annually through the permit term included the # of ESC complaints; this effort will continue for the permit term</p>
BMP categories to be implemented	Measurable goals and timeframes
Ordinance Update	<p>Staff will update the City ordinances to address new MS4 permit requirements for MCM 4.</p> <p>The ordinance revisions will be completed within the first year of the permit term and the measures will be the completed ordinance and its presentation to the City Council for adoption.</p>
Update Plan Review Procedures, Grading Checklists, and City Engineering Standards for Construction	<p>Staff will review the City's plan review procedures, grading checklists and engineering standards, updating them within the first year of the permit term as needed to address new MS4 permit requirements for MCM 4. During the remainder of the permit term, the grading checklists are updated whenever new ordinances, policies or standards necessitate a change in the requirements of the checklists.</p> <p>The measures tracked will include the completed review of checklists and standards, newly posted engineering standards, and Council adopted grading checklists.</p>
Update the SOPs and Prepare Enforcement Response Procedures for MCM 4	<p>Staff will review and update the current ESC SOPs, adding inspection prioritization criteria and written public input response procedures. Staff will also prepare a written ERP that includes observation and reporting by all field staff completing inspections and maintenance.</p> <p>The MCM 4 SOP updates and ERP will be completed within the first year of the permit term and the measure will be written procedures.</p>

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

Mike Kraszewski, Storm Water Compliance Specialist, Rochester Public Works

Matt Crawford, Infrastructure Engineer, Rochester Public Works

E. MCM 5: Post-construction stormwater management

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

The City utilized a storm water management planning process to develop engineering-based recommendations for the location and type of storm water best management practices. It also used a variety of regulatory controls to insure that grading and drainage standards were met to mitigate the effects of added impervious surface from new development and redevelopment. It used an thorough grading plan review and approval process, supplemented by field inspections during construction to insure the drainage goals of the approved plan were met. In anticipation of forthcoming volume control requirements, it tested the viability of volume control practices in certain settings. Additionally 20% of its ponds and outfalls were inspected each year. See the "Established BMP categories and Measurable goals and timeframes" table below for more details.

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

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

Within 12 months of the date permit coverage is extended, the City will develop a new storm water ordinance to address the new MCM 5 requirements. While establishing the new post-construction standards and procedures to address site limitations and exceptions in that ordinance, the City will create documentation procedures for items to be retained in the project file, including, but not limited to: the project name, location, owner and operator of the construction activity, completion of the checklist during grading plan approval, calculations used to determine compliance, supporting documentation for authorized mitigation projects, and payments received and used in lieu of on-site construction activity. See the 2014 - 2018 Storm Water Permit - Year 1 Development Plan (www.rochesterstormwater.com) for more details on the development of documentation procedures.

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

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

Established BMP categories	Measurable goals and timeframes
<p>Storm Water Management Plan</p>	<p>The City's engineering-based Storm Water Management Plans were available to developers and their engineers to guide their planning efforts by providing recommendations on the locations, types and sizes of structural BMPs and non-structural environmental corridors.</p> <p>Measures included the postings of the Plans on the storm water web site; the #, type, size and location of BMPs added to the GIS system from development each year. These practices will continue in the next permit term.</p>
<p>Trial Volume Control BMPs</p>	<p>To gain experience with volume control (an unregulated practice under the 2006 permit), the City identified several</p>

	<p>opportunities to try infiltration and filtration BMPs on City projects and implemented them on sites without physical constraints where the BMPs were cost-effective.</p> <p>Measures included the #, type, size and location of infiltration and filtration BMPs that were added to the GIS system after project completion. This BMP will not be advanced to the next permit term because it is being replaced by volume control requirements.</p>
Implement Regulatory Controls for Post-Construction Storm Water Runoff from New Development and Redevelopment	<p>The City implemented its established regulatory controls to address post-construction storm water runoff from new development and redevelopment, including: City ordinances, grading checklists, grading and drainage report and grading plan review and approval procedures, City engineering standards and detail plates, and MPCA's construction storm water permit requirements for permanent storm water management. Compliance with requirements was demonstrated via grading plan approvals, construction site inspections, and utilizing the provisions of Development and Maintenance agreements, City-Owner contracts, and other available enforcement tools.</p> <p>Measures tracked each year through the permit term included the # of grading plans approved, the # of grading deficiencies identified/corrected during field inspections, and the # of enforcement cases. These practices will be continued in the next permit term.</p>
Inspect 20% of City Ponds and Outfalls/Yr	<p>The City inspected at least 20% of its storm water ponds and outfalls each year during the permit term. Where maintenance needs were identified, a work order or contract was prepared to complete the maintenance tasks.</p> <p>Measures tracked each year included the # of annual pond and outfall inspection reports; the # of work orders or maintenance contracts issued and completed each year. These tasks will be continued in the next permit term, but moved to MCM 6.</p>
BMP categories to be implemented	Measurable goals and timeframes
Ordinance Update	<p>Staff will update the City ordinances to address new MS4 permit requirements for MCM 5.</p> <p>The ordinance revisions will be completed within the first year of the permit term and the measures will be the completed ordinance and its presentation to the City Council for adoption.</p>
Update Grading Checklists	<p>Staff will update grading checklists to address new MS4 permit requirements for MCM 5.</p> <p>The updated checklists will be completed within the first year of the permit term and the measure will be Council adoption of the new checklists.</p>
Prepare Post-Construction ERP	<p>Staff will review the current development process SOPs and extract the enforcement response mechanisms pertaining to MCM 5 so that a written ERP can be prepared that includes observation and reporting by assigned field staff.</p> <p>The MCM 5 ERP will be completed within the first year of the permit term and the measure will be written procedures.</p>
Storm Water Management Plan Update	<p>The City will update its Storm Water Management Plan (SWMP) to incorporate the post-construction requirements of the new MS4 permit.</p> <p>The SWMP Update will be completed within the first year of the</p>

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

Matt Crawford, Storm Water Infrastructure Engineer, Rochester Public Works

Barb Huberty, Environmental and Regulatory Affairs Coordinator, Rochester Public Works

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

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

The City reviewed its facilities with outdoor operations to identify and correct storm water impacts. It routinely swept streets, cleaned catch basins, completed inspections of parking lots, stockpiles and material storage and handling areas, and conducted a variety of facility maintenance activities. See the "Established BMP categories and Measurable goals and timeframes" table below for more details.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? Yes No

3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

The City's existing facility inventory does not address all the added requirements of the new MS4 permit and will be updated to account for those changes within the first 12 months after permit coverage is extended according to the schedule shown in the 2014 - 2018 Storm Water Permit - Year 1 Development Plan, which can be found on Rochester's Storm Water web site (www.rochesterstormwater.com).

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

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

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

Established BMP categories	Measurable goals and timeframes
Facility Audits	<p>The City developed an auditing protocol so that it could evaluate City Departments having activities with storm water pollution potential once during the permit term. Once evaluated, input was provided to facility staff on appropriate practices. Each facility was given a map showing the location of receiving waters and nearby storm water management system components.</p> <p>Measures tracked during the permit cycle were the completed protocol and maps for each facility, a completed audit for each facility (tallying the # of audits/yr), and audit feedback provided to facility managers. One full round of audits was completed in 2009. This activity is not required by the permit and will not be continued in the new permit term.</p>
Street Sweeping	<p>The City's storm water related street sweeping program focused on an annual City-wide spring sweep to remove winter sand accumulations and a City-wide fall sweep to remove leaves. (The City also conducted sweeping for non-storm water management purposes, such as during street rehabilitation projects and Central Business District aesthetics maintenance.) Collected sweepings are stockpiled at the City's Material Processing Facility. After screening, sand is reused in construction projects. Leaves are land-applied to amend onsite soils. Waste is taken to the Kalmar Landfill.</p>

	Measures tracked annually through the permit term were the # of lane miles swept and # of loads of street sweeping debris collected. This activity will be continued in the next permit term.
Catch Basin Maintenance	<p>Visual inspections of catch basin tops were made with each sweeping event and catch basins identified as needing further inspection, cleaning or repair were reported to Maintenance staff. Catch basin tops were also cleared after significant rainfall events. Each fall, maintenance staff identified catch basins plugged with leaves and vacuum-cleaned them. The City has 8 catch basin sumps which were vacuum-cleaned at least annually. Catch basins associated with road projects were inspected prior to project initiation to determine if repairs would be needed during construction.</p> <p>Measures tracked annually through the permit term included the # of catch basins visually inspected, cleaned, repaired and replaced. This activity will be continued in the next permit term.</p>
Exposed Stockpile, Storage and Material Handling Areas Inspections	<p>All exposed stockpile, storage and material handling areas were inspected annually. If problems were identified, City storm water compliance staff made recommendations for corrective actions to the facility operator(s) for implementation.</p> <p>Measures tracked annually through the permit term included inspection records and the total # of inspections. This activity will be continued in the next permit term, but the frequency will be changed to quarterly.</p>
Routine Storm Water Facility Maintenance	<p>The City hired contractors to maintain appropriate vegetative conditions at its storm water pond and drainage way properties. These contractors reported any observed or evolving issues that needed attention so that work orders could be generated. One of the contractors was also tasked with completing minor erosion control repairs, outfall repairs, and noxious weed removal while onsite.</p> <p>Measures tracked annually included the # of and locations of sites with pesticide applications, mowing, and minor repairs. This activity will be continued in the next permit term.</p>
Complaint and Inspection Driven Storm Water Facility Maintenance	<p>The City created a work order system to transfer maintenance needs identified via complaints and inspections to City Maintenance staff and its mowing/maintenance contractor. Larger maintenance needs beyond their capacity were programmed as Capital Improvement Program (CIP) projects. These larger CIP projects involved a combination of tasks that may have included: feasibility studies, materials testing, easement acquisition, environmental permitting, engineering design, preparation of plans and specifications, bid letting, and contract execution with external contractors. Depending on the project's complexity and cost, some CIP projects were completed within a budget year, while others were programmed over many years.</p> <p>Measures tracked annually through the permit term included the number of work orders created and completed and the number of open CIP maintenance projects.</p>
Record Keeping	<p>The City used and retained various report forms, spreadsheets, databases, and photographs to record results of inspection, enforcement and maintenance activities.</p> <p>The measures for this item included file records and annual reports. This activity will be continued through the next permit term.</p>

BMP categories to be implemented

Measurable goals and timeframes

New Parking Ramp Contractor Facility Inspection	The City contracts with an outside vendor to manage its parking ramps. If the vendor changes during the permit term, City storm water compliance staff will inspect each ramp with the contract managers for the City and the vendor, identifying the operations needed to reduce pollution potential.
Inspect 20% of City Ponds and Outfalls/Yr	<p>The measure will be the completed, one-time inspections of all City parking ramps, if a new vendor is hired to manage parking ramp operations.</p> <p>The City will inspect at least 20% of its storm water ponds and outfalls each year during the permit term to determine structural integrity, proper function, and maintenance needs. Where maintenance needs are identified, a work order or contract will be prepared to complete the maintenance tasks.</p> <p>Measures to be tracked will include the # of annual pond and outfall inspection reports and the # of work orders or maintenance contracts issued and completed each year.</p>
Inspect 100% of Non-Pond Structural BMPs/Yr	<p>The City will inspect 100% of its non-pond structural BMPs each year during the permit term. Where maintenance needs are identified, a work order or contract will be prepared to complete the maintenance tasks.</p> <p>Measures to be tracked will include the # of annual BMP inspection reports and the # of work orders or maintenance contracts issued and completed each year.</p>
Review the Non-Pond Structural BMP Complaint and Inspection Findings in Years 2 – 5 and Modify as Allowed	<p>Beginning at the end of year 2, when compiling data for the annual MS4 report, determine if complaints received or patterns of maintenance for non-pond structural BMPs indicate if a greater frequency is necessary or whether maintenance or sediment removal is not required after completion of the first two annual inspections. If not, then reduce the frequency of inspections to once every two (2) years. Additionally, review the 2006 permit requirements and, if applicable, adjust the inspection frequency accordingly, providing documentation as required in Part III.D.6.h(2).</p> <p>Measures to be tracked with each review will be the numbers of complaints and work orders associated with each non-pond structural BMP and documentation of inspection frequency changes.</p>

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

employee's job duties that:

- a. Addresses the importance of protecting water quality? Yes No
- b. Covers the requirements of the permit relevant to the duties of the employee? Yes No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? Yes No

9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? Yes No

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

5.b.2) The City does not have any surface water intakes, so this item is not applicable.

6. The City will need to develop a procedure and schedule to determine TSS and TP treatment effectiveness for the City's storm water ponds within 12 months of the date permit coverage is extended.

7. The City has written inspection SOPs in place for ponds, outfalls and stockpile, storage and material handling areas. It does not have inspection SOPs written for any other types of structural storm water BMPs and will need to develop them within 12 months of the date permit coverage is extended.

8.a. - c. At the onset of the permit, all City employees received an introduction to the permit and how it relates to their actions at work and at home. Once that was completed, the storm water permit introduction was incorporated as a component of the City's new, full-time employee orientation program, which takes place after a certain number of new employees are hired (approximately quarterly). The new hire presentation will need to be updated to provide a section that links permit requirements and job duties, Additionally, an orientation document will need to be developed for seasonal employees, along with a recurring training plan for existing employees that addresses changes in procedures, practices, techniques or requirements. These employee training modifications will be made within 12 months of the date that permit coverage is extended See the Storm Water General Education Work Plan posted at www.rochesterstormwater.com for more details.

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

Megan Moeller, Storm Water Educator, Rochester Public Works, is responsible for employee training

Mike Kraszewski, Storm Water Compliance Specialist, Rochester Public Works, is responsible for coordinating with facility managers throughout the City to insure that pollution prevention practices are implemented

Barb Huberty, Environmental and Regulatory Affairs Coordinator, Rochester Public Works, is responsible for developing the TSS/TP treatment effectiveness plan.

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

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? Yes No

- 1. If **no**, continue to section VII.
- 2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

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

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

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? Yes No

- 1. If **no**, this section requires no further information.
- 2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

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

VIII. Add any Additional Comments to Describe Your Program

The City will be initiating two projects in 2014 that will support the storm water management program. One effort is the adoption of a new web site platform, so the storm water web site will undergo a complete review and redesign in order to function with the new software. The other effort will be the purchase of Elements XS software (an asset management system) and a multi-year programming effort to improve cost-effectiveness and efficiencies by centralizing infrastructure-based data and developing systems to issue and execute both planned and reactive inspections and work orders.