UNIFIED GOVERNMENT OF WYANDOTTE COUNTY
& KANSAS CITY, KANSAS
PUBLIC WORKS DEPARTMENT

ONE McDOWELL PLAZA 701 NORTH 7TH STREET, 66101 (913) 573-5400
FAX (913) 573-5435

February 27, 2021

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
(*Courtesy Copy via Electronic Mail)*

Tom Stiles, Director
Kansas Department of Health and Environment
Bureau of Water
1000 SW Jackson, Suite 420
Topeka, KS 66612-1367
(*cc via email: Thomas.Stiles@ks.gov*)

Re: Kansas Water Pollution Control NPDES Permit No. M-Mo25-SO01
Transmittal Letter for 2019 MS4 Program Annual Report

Please find enclosed the 2020 Annual Report for the Unified Government's Municipal Separate Storm Sewer System (MS4) Program. This report covers the period from January 1, 2020, through December 31, 2020. Pursuant to the MS4 Permit, this report has a required submittal date of February 28, 2021.

Thank you for your participation and cooperation in this important program. If you have any questions, please contact me at (913) 573-5400.

Sincerely,

Jeff Fisher
Director of Public Works

Enclosure

cc: Lisa Ochsenhirt
AquaLaw
(via email: lisa@AquaLaw.com)

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Department of Legal Services
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KANSAS STORMWATER 2020 ANNUAL REPORT FORM FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

Please place an "X" in the left box if any information has changed from previous years

☐	Permittee [Agency Name] Mailing Address 1:	Unified Government of Wyandotte County/ Kansas City, Kansas
☐	Mailing Address 2:	701 N. 7th St.
☐	Municipality:	Kansas City
☐	State:	Kansas
☐	Zip Code:	66101
☐	MS4 Program Contact Person:	Jonathan Wiles
☐	Contact E-Mail Address:	jwiles@wycokck.org
☐	Contact Phone Number:	913-573-5700
☐	Construction E-Mail Address:	jxiong@wycokck.org
☐	Contact Phone Number:	913-602-6701
☐	Kansas Permit Number: — Ex. M-MC21-SU01	M-MO25-SO01

Reporting period covers activities from January 1, 2020 through December 31, 2020.

This annual report must be submitted to the Kansas Department of Health and Environment (KDHE) by February 28th, 2020. The annual report is to be submitted as PDF files to KDHE preferably on a standard compact disk (CD) or digital versatile disk (DVD). If the permittee does not have the ability to provide the files in a CD or DVD, a flash drive can be submitted. Some permittees provide additional hard copy submissions of the annual report or supplemental documents along with the electronic files. There is no requirement to provide hard copies of any documents other than a simple transmittal letter.

B. EXECUTIVE SUMMARY

Introduction: Stormwater Management Plan (SMP). The UG created a new SMP in 2020 in compliance with the 2020 MS4 Permit. The SMP is being submitted with this Annual Report for review. Consistent with the requirements of the 2020 MS4 Permit, the 2020 Annual Report will focus on implementation of the current SMP ("[t]he permittee shall continue to implement and enforce the current Stormwater Management Program (SMP), as documented in the SMP document, until an updated SMP is implemented.") The UG will begin implementing the new SMP in 2021.

Effects of COVID-19 on MS4 Program

On March 12, 2020, Governor Laura Kelly issued an emergency declaration for the State of Kansas relating to COVID-19 (recently extended through March 31, 2021). On March 13, 2020, President Trump declared the pandemic a National Emergency. On March 23, 2020, the UG submitted a General Force Majeure Notification to the U.S. Department of Justice, the U.S. Environmental Protection Agency, and the Kansas Department of Health and Environment (KDHE) regarding the 2013 Partial Consent Decree. Unfortunately, beginning in 2020 and continuing into 2021, COVID-19 has created an emergency that fits squarely within the definition of a force majeure—an unforeseeable, uncontrollable situation with severe negative impacts on our citizens. The UG appreciates the multiple environmental agencies, from EPA to KDHE, that formally acknowledged the incredible strain COVID-19 has placed on clean water permittees and clarified that there would be enforcement discretion based on good-faith compliance during the pandemic.

Despite these extraordinary circumstances, the UG worked diligently throughout 2020 to comply with the MS4 permit. Of course, the pandemic has affected nearly every aspect of life and the MS4 program is no exception. During the month of April, 2020, the UG, like other local governments in Kansas, furloughed staff for two weeks which affected productivity. When it was feasible, the UG adjusted activities to meet CDC guidelines. Examples are using Zoom for training activities, rescheduling events, and reducing the number of participants to provide social distancing. Unfortunately, there were some events that the UG had to cancel for safety and health concerns or to comply with federal COVID recommendations or State executive orders. For example, some of the household hazard waste (HHW) drop off events were cancelled. Volunteer activities including inlet stenciling and trash cleanups with Operation Brightside were cancelled. In both cases, the UG was concerned with the number of people who might congregate in a group. Out of an abundance of caution, the UG felt it would be appropriate to cancel these large group gatherings. The number of outfalls inspected was also affected due to COVID related staffing shortages and health concerns.

Overall, however, the UG is very proud of the work we did to comply with the SMP even in the middle of a global pandemic. Specifics regarding the efforts taken are provided in the 2020 Annual Report.

TMDL and Wet Weather Monitoring

In accordance with the new 2020 permit, the UG is now monitoring at locations to LTC-01, BHC-01 and a new site BARC-01. The permit also changed requirements on sampling parameters to sampling for E. Coli bacteria for the Kansas River.

Aspects of the Program Especially Effective at Reducing Pollutants in Stormwater Discharge.

The UG was able to upload all Post-Construction Stormwater Treatment Facilities into its GIS and Lucity databases. Lucity will provide the UG with an improved ability to schedule, track, and maintain all the Post-Construction information.

Aspects of the Program Providing Unsatisfactory Results. As stated above, there were necessary COVID related restrictions during 2020. However, none of the program aspects resulted in unsatisfactory results.

The Most Successful Part of the Program. Overall, the program provided successful results in 2020.

The Most Challenging Aspect of the Program. The Post-construction program continues to be a challenge. In 2020, the UG imported Public and Private STFs into its GIS and Lucity software. The challenges now lie in efforts to improve the program through education outreach, training, procedural enhancements, and revisions to the ordinances.

The IDDE program is continuing to improve. In 2019, the UG held several interdepartmental meetings with Water Pollution Control, WPC Lab, Health Department, Engineering, and Benesch to identify opportunities for improving communication and reporting of suspected illicit discharges, responses, and ordinance changes. The documentation and interdepartmental communications improved in 2020, but the UG will continue to further improve coordination between departments for central reporting, documentation, and tracking in 2021.

The City/County area MS4 Cleanups. The UG collaborates with Operation Brightside, Friends of the Kaw, school, neighborhood, and church groups. The Engineering Department provides trash bags with the UG Logo and an educational message, “Your Litter Could End up in Local Rivers, Streams, and Lakes! Please Do Not Litter!” We also coordinate with the Public Works Street Department to pick up the trash bags and dispose of them when the event is complete. The UG Police Department also participates in off the clock community cleanup events

throughout the year. As noted above, COVID-19 restrictions and public health concerns forced the UG to cancel many of the events this year.

Elected Official Participation in Stormwater Pollution Reduction/Elimination. Elected officials are updated regularly about the status and accomplishments of the Stormwater Management Program. UG staff welcomes feedback regarding the program frequently throughout the year.

Collaboration with Other Organizations. The success of many of the UG's programs can be attributed to the strong partnerships and collaborations with other metro organizations. The UG has been an active member in the Water Quality Education Committee organized by MARC. This effort includes representatives from multiple cities and communities in the metro area, encouraging sharing of ideas and promoting a uniform message on water quality in the region. Other active partnerships include Friends of the Kaw, Operation Brightside and other local organizations.

Audits/Inspections Conducted by KDHE or EPA. The UG was not audited during this Annual Report reporting period.

IN ADDITION, provide the following:

1. A current copy of the Stormwater Management Program (SMP) Document as a PDF file along with the Annual Report.
2. Include an executive summary to this report which briefly covers the major aspects of the MS4 stormwater management program enacted during the year. In completing the executive summary, the preparer should address the following questions:

    1. Were there any aspects of the program that appeared especially effective at reducing pollutants in your stormwater discharge?
    2. Were there any aspects of the program that provided unsatisfactory results?
    3. What was the most successful part of the program?
    4. What was the most challenging aspect of the program?
    5. Describe any City/County area MS4 clean-ups and the participation.
    6. Describe the elected officials' participation in the stormwater pollution elimination.
    7. Describe the collaboration with other organizations to eliminate stormwater pollution.
    8. If an audit/inspection of your MS4 program was conducted by EPA or KDHE during the year, list the items the audit/inspection report identified as required changes and provide a narrative explanation of how the changes were implemented or explain the plan to implement the changes and identify a target date for final implementation.

    The executive summary does not need to be extensive and detailed. It is anticipated the executive summaries will range from one half of a page to two pages in length depending on the scope of the program.

3. Any new stormwater ordinances/resolutions or revised ordinances/resolutions which have not already been submitted to KDHE for review and retention.

This template annual report document (basic report) for the 2018 reporting period has changed from the annual report format used in previous years. This document focuses on the core aspects of permit requirements including the Stormwater Management Program, the Six Minimum Control Measures (Public Education and Outreach, Public Involvement and Participation, Illicit Discharge Detection and Elimination, Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management in New Development and Redevelopment Projects, and Pollution Prevention/Good Housekeeping for Municipal Operations), Total Maximum Daily Load (TMDL) Best Management Practices and TMDL wet weather monitoring. Additionally, for Phase I permittees a program to monitor their listed industrial facilities is required. Although any failure to comply with a requirement of the MS4 National Pollutant Discharge Elimination System (NPDES) permit may expose the permittee to enforcement action by either the permitting authority (Kansas Department of Health and Environment) or by the Environmental Protection Agency, the failure to implement the core aspects of the permit likely increases the risk of not only enforcement but also of incurring a monetary penalty.

The permittee is well advised to accurately report the conditions and status of their stormwater program and give due consideration to improving or enhancing their program where it is weak, or deficient in any of the core aspects (stormwater management program, six minimum control measures and TMDL best management practices – if applicable – also for Phase I permittees monitoring industrial facilities).

TOPICS REQUIRED TO BE ADDRESSED IN THIS REPORT AS IDENTIFIED IN PART V OF THE PERMIT

Within the next one or two pages, or perhaps more if so desired, provide comments addressing the following items:

1. Provide the status of compliance with permit conditions, an assessment of the appropriateness of the implemented Best Management Practices, progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP), and the measurable goals with an indication of the progress toward meeting the goals for each of the six minimum control measures.

2. Provide results of information collected and analyzed, (for example test results, surveys, or public comments/input) during the annual reporting period. This may include monitoring data used to assess the success of best management practices with respect to reduction in pollutant discharge. Include an interpretation of the information which addresses success or failure of the portion of the program for which the information applies.

3. Provide results of information collected and analyzed, if any, during the annual reporting period, including monitoring data used to assess the success of the program at reducing the TMDL regulated pollutants.

4. Provide a summary of the stormwater activities that were scheduled to be undertaken during the previous calendar year and the status of these activities.

5. Provide a summary of the stormwater activities which are scheduled to be undertaken during the next calendar year (including an implementation schedule).

6. Provide a map showing changes in the permittee's Permit Area if the permit area has changed within the year.

7. Provide a description of significant changes in any of the BMPs.

8. Provide a list of any ordinances or resolutions which were updated in the last year and are associated with the SMP. Please note, page on of this report requires submission of any new stormwater related ordinances or resolutions or any such updated ordinances or resolution be submitted with this annual report.

9. Provide a list of other parties (such as other municipalities or consultants), which are responsible for implementing any of the program areas of the Stormwater Management Program.

10. For Phase I permittees only, provide a summary of the inspection results, including the wet weather surface water quality monitoring test results, and information obtained under PART III Monitoring Industrial Stormwater Discharges section of this permit.

SIX MINIMUM CONTROL MEASURES FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s) WITH NPDES PERMITS

The following outlines the NPDES permit requirements for implementation of the Six Minimum Control Measures as required under Kansas MS4 permits issued by the KDHE. The NPDES permit provided to the MS4 authority should be reviewed for additional requirements associated with implementation of the Six Minimum Control Measures such as deadlines for the implementation of the requirements or supplemental requirements associated with the individual measures. The general requirements are as follows:

A. Six Minimum Controls — The permittee shall develop and implement Best Management Practices (BMP's) with measurable goals for each of the six minimum control measures. The six minimum control measures and the associated requirements are listed and explained as follows:

1. **Public Education and Outreach**

   The permittee shall implement a public education program which includes distribution of educational materials to the community or conducting equivalent outreach activities which address the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.

2. **Public Involvement and Participation**

   The permittee shall implement a public involvement and participation program to solicit public comment and recommendations regarding the BMP's and measurable goals utilized by the permittee to comply with the permit. The permittee shall comply with state and local public notice requirements when implementing a public involvement and participation program.

3. **Illicit Discharge Detection and Elimination**

   The permittee shall:

   a. develop, implement and enforce a program to detect and eliminate illicit discharges into the MS4;
   b. Develop a storm sewer system map of the permittee's MS4, showing the location of all outfalls, either pipes or open channel drainage, showing the names and location of all streams or lakes that receive discharges from those outfalls. A copy of the map shall be submitted to KDHE. This map may be submitted as a PDF file(s) on a CD or DVD.
   c. Enact ordinances or resolutions to prohibit non-stormwater discharges into the storm sewer system and implement appropriate enforcement procedures and actions if the permittee has such authority. A copy of the ordinances or resolutions shall be submitted to KDHE.
   d. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and

e. Develop and implement a plan to detect and address prohibited non-stormwater discharges, including but not limited to illegal dumping, to the storm sewer system. Unless identified by either the permittee or KDHE as a significant source of pollutants to waters of the state, the following examples of non-stormwater discharges are not prohibited from entering the MS4:

1. Water line flushing
2. Diverted stream flow
3. Rising groundwaters
4. Uncontaminated groundwater infiltration as defined under 40 CFR 35.2005(20) to separate storm sewers
5. Uncontaminated pumped groundwater
6. Contaminated groundwater if authorized by KDHE and approved by the municipality
7. Discharges from potable water sources
8. Foundation drains
9. Air conditioning condensate
10. Irrigation waters
11. Springs
12. Water from crawl space pumps
13. Footing drains
14. Lawn watering
15. Individual residential car washing
16. Occasional not-for-profit car wash activities
17. Flows from riparian habits and wetlands
18. Dechlorinated swimming pool discharges excluding filter backwash
19. Street wash waters (excluding street sweepings which have been removed from the street)
20. Discharges of flows from firefighting activities
21. Heat pump discharge waters (residential only)
22. Treated wastewater meeting requirements of a NPDES permit
23. Sump pump drains
24. Other discharges determined not to be a significant source of pollutants to waters of the state, a public health hazard, or a nuisance

4. Construction Site Stormwater Runoff Control

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

a. Permittees which have the authority to enact ordinances or resolutions shall enact such ordinances or resolutions to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State and Local law;

b. Requirements for construction site owners or operators to implement appropriate erosion and sediment control best management practices;

c. Requirements for construction site owners or operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that are likely to cause adverse impacts to water quality;

d. Procedures for site plan review which incorporate consideration of potential water quality impacts;

e. Procedures for receipt and consideration of information submitted by the public;

f. Procedures for site inspection and enforcement of control measures.

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

The permittee shall develop, implement, and enforce a program to address post-construction stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development and implementation, at a minimum of the following:

a. BMP's to prevent or minimize adverse water quality impacts;

b. Strategies which include a combination of structural and/or non-structural BMP's appropriate for the municipality;

c. For permittees which have the authority, ordinances or resolutions to address post-construction runoff from new development and redevelopment projects to the extent allowable under State and local law;

d. Ensure adequate long-term operation and maintenance of BMP's

6. Pollution Prevention/Good Housekeeping for Municipal Operations

The permittee shall develop and implement an operation and maintenance program that includes employee training to prevent and reduce stormwater pollution from municipal operations activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

B. Stormwater Management Program

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
☒	☐	☐	Has the Stormwater Management Program (SMP) been developed and implemented?
☒	☐	☐	Has the SMP been modified or updated during this reporting period?
☒	☐	☐	If the answer to question 2 above was "yes," has the modified SMP been submitted to KDHE for review?*

If the answer to item 3 is a "NO," a copy of the updated SMP must be submitted with this annual report. If it is anticipated a measurable goal cannot be met in the next year the SMP should be modified and submitted to KDHE for review. The modifications may include different BMP's and/or revised goals to avoid being in a position of non-compliance. However; reasonable BMP's with reasonable goals must be implemented or KDHE may require the permittee to modify the SMP to include additional or better BMP's and/or more reasonable goals.

*The revised SMP is being submitted with this report.

B. Stormwater Management Program (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
10.A	Hire a Stormwater Coordinator.	10.A.1 - Create a new position of Stormwater Coordinator.	Completed in 2012
		10.A.2 - Fill the Stormwater Coordinator position.	The UG filled the position of Stormwater Coordinator in 2019.
10.B	Create Stormwater Executive Committee to Provide Administrative Oversight, Coordination and Direction.	10.B.1 - Form Stormwater Executive Committee and conduct meeting.	Completed in 2013
		10.B.2 - Stormwater Executive Committee to consider formation of other committees as needed.	Committees were deemed unnecessary at this time.
		10.B.3 - Prepare Executive Committee meeting minutes.	An Executive Committee Meeting was held quarterly. Minutes are available upon request.
10.C	Conduct an Annual Financial Analysis of the Stormwater Program.	10.C.1 - Conduct an annual analysis of the program's funding and expenses.	Completed in 2020.
		10.C.2 - Include a copy of the financial analysis in the Annual Report.	A summary of the financial analysis can be found in Appendix 10.C.

C. Total Maximum Daily Load (TMDL) Best Management Practices

C. Total Maximum Daily Load (TMDL) Best Management Practices (BMP's)

Some permittees are required to implement BMPs to reduce the discharge of listed TMDL regulated pollutants (potentially any or all of the following pollutants – bacteria, nutrients, and sediment)

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
☒	☐	☐	Were any BMP's intended to attenuate the discharge of TMDL regulated pollutants implemented? See your permit to determine if TMDL regulated pollutants are listed for the receiving stream affected by your stormwater system (TMDL Table).
☒	☐	☐	List all of the BMP's intended to attenuate the discharge of TMDL regulated pollutants as identified in the SMP and provide the requested information in the following table.

List all the TMDL BMPs as identified in the SMP and provide the requested information in the following table.

C. Total Maximum Daily Load (TMDL) Best Management Practices

BMP ID Number	Brief BMP Description	Regulated TMDL Parameter	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
8.A	Develop and Implement BMPs to Reduce TMDL Regulated Pollutants (Bacteria), to the Maximum Extent Practicable, from Entering the Kansas River.	Bacteria	8.A.1 - Implement BMPs by distributing pet waste brochures, regulating septic systems, and focus IDDE Major Outfall inspection program within Kansas River basin.	Completed.
			8.A.2 - Include all reports and activities in the Annual Report.	Completed. See Appendix 8.A.
8.B	Undertake Activities to Reduce Stormwater Impacts on Wyandotte County Lake.	Nutrients	8.B.1 - Develop baseline report of existing conditions surrounding the lake.	Completed in 2013.
			8.B.2 - Gather and analyze tributary samples taken four times per year.	2020 MS4 Permit no longer requires sampling of WYCO Lake; SMP, revised for 2020 Permit, has been updated to remove sampling
			8.B.3 - Place high priority on sites surrounding the lake when enforcing E&SC and post-construction elements.	Ongoing effort.
			8.B.4 - Conduct a follow-up bathymetric survey of lake. (2017)	Completed in 2017.
			8.B.5 – Take Secchi Disk Readings at up to three locations, three times/yr.	The UG obtained all required Secchi disk readings. See Appendix 8.B for results.

C. Total Maximum Daily Load (TMDL) Best Management Practices

BMP ID Number	Brief BMP Description	Regulated TMDL Parameter	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
8.B (Continued)	Undertake Activities to Reduce Stormwater Impacts on Wyandotte County Lake.	Nutrients	8.B.6 – Develop plan to determine significant sources of phosphorus entering lake.	Completed. A technical memorandum was prepared which summarized results of the assessment in 2017.
			8.B.7 – Implement plan developed in 8.B.6.	Completed in 2018. Plan is to continue monitoring WYCO Lake.
			8.B.8 – Compose a technical memorandum pertaining to 8.B.6 and 8.B.7 and recommendations.	Completed in 2019. See 2019 Annual Report for details.
8.C	Develop and Implement BMPs focused on the Little Turkey Creek (LTC) and Brenner Heights Creek (BHC) Watersheds as proxies for the Kansas River.	Nutrients, Sediment and Bacteria	8.C.1 – Distribute pet waste brochures to be displayed at parks and/or other UG owned facilities located within the LTC and BHC watersheds.	Completed. Brochures are available at the West Wyandotte Library (LTC watershed) and Parks and Recreation (BHC watershed). See Appendix 1.A.

C. Total Maximum Daily Load (TMDL) Best Management Practices

BMP ID Number	Brief BMP Description	Regulated TMDL Parameter	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
8.C (continued)	Develop and Implement BMPs focused on the Little Turkey Creek (LTC) and Brenner Heights Creek (BHC) Watersheds as proxies for the Kansas River.	Nutrients, Sediment and Bacteria	8.C.2 - Distribute leaf litter related brochures to be displayed at parks and/or other UG owned facilities located within the LTC and BHC watersheds.	Completed. Brochures are available at the West Wyandotte Library (LTC watershed) and Parks and Recreation (BHC watershed). See Appendix 1.A.
			8.C.3 – Perform dry weather major outfall inspections focused on LTC and BHC watersheds.	Completed in 2017.
			8.C.4 – Install and maintain Pet Waste stations in parks within LTC and BHC watersheds if deemed necessary.	Pet Waste stations were maintained in all parks.

C. Total Maximum Daily Load (TMDL) Best Management Practices

BMP ID Number	Brief BMP Description	Regulated TMDL Parameter	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
8.D	Assess BMPs Focused on LTC and BHC Watersheds Targets as proxies for Kansas River.	Nutrients, Sediment and Bacteria	8.D.1 – Summary of assessment of potential pollutants within LTC and BHC watersheds	Completed in 2017.
			8.D.2 – Provide summary of preliminary assessment of LTC and BHC watersheds based on 2016 and 2017 wet weather sample results. Recommend BMPs if deemed necessary.	Completed in 2018.
			8.D.3 – Implement any BMPs identified in 8.D.2.	Continued to monitor watersheds per 2019 recommendations.

C. Total Maximum Daily Load (TMDL) – Wet Weather Monitoring Best Management Practices

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
9.A	Implement SOPs to Address Monitoring of TMDL Regulated Pollutants.	9.A.1 - Implement existing wet weather monitoring SOPs.	Completed in 2013.
		9.A.2 - Review and update, if needed, any SOPs.	Completed in 2014.
		9.A.3 - Provide copy of updated Monitoring Plan and data analysis procedures in the Annual Report.	Completed. The UG is following sampling and data analysis per the 2020 MS4 Permit which has been streamlined. A detailed plan was deemed unnecessary. See Appendix 9.A. SMP, revised for 2020 Permit, has been updated to reflect new sampling requirements.
		9.A.4 – Review in 2016 SOPs for monitoring and data analysis and modify if necessary.	Completed in 2016.
9.B	Develop Tracking System for Wet Weather Monitoring Activities	9.B.1 - Develop spreadsheet to track the water quality results.	Completed in 2013.

C. Total Maximum Daily Load (TMDL) – Wet Weather Monitoring Best Management Practices

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
9.C	Conduct Water Quality Analyses of SW Discharges to Assess Effectiveness of Implemented BMPs and Stormwater Pollution Prevention Actions.	9.C.1 – Annually prepare memorandum on analyses results.	Completed. Summary of results is located in Appendix 9.C.
		9.C.2 - Provide copy of data analysis in the Annual Report.	Completed. See Appendix 9.C.
		9.C.3 – Continue analyzing samples gathered at (2016) active locations.	Completed in 2016.
		9.C.4 – Begin analyzing in 2017, samples at locations determined in 9.D.1.	2020 MS4 Permit requires sampling in 3 locations for E. Coli only. The UG completed sampling and analysis accordingly. See Appendix 9.C for summary of the analysis results. SMP, revised for 2020 Permit, has been updated to reflect new sampling requirements.
9.D	Perform sampling activities at Wet Weather Monitoring Sites.	9.D.1 – Conduct an assessment in (2016) of current monitoring locations and determine future locations.	Completed in 2016.
		9.D.2 – Gather samples at the six (2016) locations.	Completed in 2016.
		9.D.3 – Begin analyzing in 2017 samples at 8 locations determined in 9.D.1.	2020 MS4 Permit requires sampling in 3 locations for E. Coli only. The UG completed sampling and analysis accordingly. Summary of results is located in Appendix 9.C.

D. Stormwater Management Program Requirements (Six Minimum Controls)

1. Public Education and Outreach (Table)

List all of the public education and outreach BMPs as identified in the SMP and provide the requested information in the following table. (List presentations & media)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
1.A	Gather and Distribute Printed Stormwater Educational Materials.	1.A.1 - Purchase copies of selected SW flyers.	Completed. Over 500 flyers of various messages were distributed to multiple locations. See Appendix 1.A.
		1.A.2 – Place flyers in various public locations.	Completed. See Appendix 1.A.
		1.A.3 – The UG shall continue to prepare envelope inserts designed educate the general public on several of the key elements of the SMP. Insert shall be bilingual.	Completed. A bilingual Board of Public Utilities bill insert was created and covered the topic of discharging swimming pool water. See Appendix 1.A.
		1.A.4 – Distribute envelope inserts in water bills.	Completed. See Appendix 1.A for Summary.
		1.A.5 – Replenish flyers at targeted locations.	Completed. See Appendix 1.A for locations.

1. Public Education and Outreach (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
1.B	Deliver Televised Programs/Announcements on Stormwater Management/Surface Water Quality/How to Reduce Pollutants to the Storm Sewer System on UG's Cable Channel.	1.B.1 – Research preparing or obtaining 3rd party license for a Public Service Announcement (PSA).	Completed in 2014.
		1.B.2 – Prepare or obtain 3rd Party Public Service Announcement.	Completed in 2014.
		1.B.3 – Air PSA at least four times per year.	The UG aired four (4) PSAs on UGTV a total of 1,225 times. See Appendix 1.B
		1.B.4 – Annually review PSA and modify as needed.	Completed. PSAs were reviewed, and UG is satisfied with the content and message of the PSAs.
1.C	Enhance Existing Website to Provide Information of Stormwater Issues.	1.C.1 – Include copy of approved SMP.	Completed. See Appendix 1.C.
		1.C.2 – Copy of Annual Report placed on website within 30 days of submitting the Annual Report to KDHE.	Completed. See Appendix 1.C.
		1.C.3 – PSA placed on UG's website.	Completed in 2014.

1. Public Education and Outreach (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
1.D	Contribute Financially to Local Agencies within Wyandotte County Who Promote SW Management Improvements.	1.D.1 – Annual contribution to Wyandotte County Conservation District (WCCD).	Completed. Contributed $45,000 to WCCD in 2020. A summary of the WCCD 2020 activities can be found in Appendix 1.D.
1.E	Contribute Financially to Regional Agencies Who Promote SW Education and Management Improvements.	1.E.1 – Annual membership and contribution to Mid-America Regional Council (MARC).	Completed. Paid $15,000 in dues for the MARC Committee. Active in MARC Water Quality Education Committee and Co-Chair of Education Sub-Committee. See Appendix 1.E.
1.F	Utilize Local Newsletters for Education of SW Related Issues.	1.F.1 – Submit one article per year in Livable Neighborhoods newsletter.	Completed. The UG submitted four (4) stormwater quality related articles that were published in both the Livable Neighborhoods monthly newsletter and weekly e-newsletter to over 5,000 recipients. See Appendix 1.F for subject of and summary of articles published and a sample article.

1. Public Education and Outreach (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
1.F (continued)	Utilize Local Newsletters for Education of SW Related Issues. Cont.	1.F.2 – Submit at least three (3) articles for publication in the UG's Weekly E-news.	Completed. four (4) articles were included in the UG's Weekly E-News newsletter that has approximately 3,000 subscribers. See Appendix 1.F summary of articles published and a sample article.
1.G	Annual Review of Media Used for Public Outreach.	1.G.1 – Annually review media outlets used for public outreach efforts.	Completed. Will continue to use UG E-news, Facebook, Twitter, UG-TV, Liveable Neighborhoods, Nextdoor and website. See Appendix 1.G.
1.H	Create and maintain a Stormwater Speaker Bureau.	1.H.1 - In 2018 the UG will begin operation of the Stormwater Speaker Bureau with the intent of speaking at 8 events per year.	The program was discontinued at the end of 2019 due to lack of public interest and redundancy.
		1.H.2 - Solicit topics for Stormwater Speaker Bureau.	The program was discontinued at the end of 2019 due to lack of public interest and redundancy.

1. Public Education and Outreach (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
1.I	Conduct Outreach to Natural Stream Owners.	1.I.1 – Identify in 2018 and evaluate the extent of natural streams within the MS4 area.	Completed in 2018.
		1.I.2 –Conduct in 2019 at least one outreach activity to select land owners to provide information about activities that land owners can take to enhance and protect natural streams and enlist the Parks and Recreation department.	As stated in the 2019 Annual Report, the UG decided to broaden its program to have a more positive impacts on the water quality of local streams and creeks. The UG reached out to those in the Brenner Heights Creek and Little Turkey Creek watersheds to educate them on stream degradation and what they could do to prevent it. An educational postcard was mailed to residents within the watersheds with streams running through their property. See Appendix 1.I

2. Public Involvement and Participation (Table)

List all of the public involvement and participation BMPs as identified in the SMP and provide the requested information in the following table. (List all associations & partnerships)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
2.A	Create a Stormwater Quality Education Grant Program.	2.A.1 - Prepare criteria for a SW Quality education grant program.	Completed in 2014.
		2.A.2 – Promote the grant program to local teachers/schools/districts/non-profits via various media outlets.	Completed. The grant program was advertised through the UG website, and MARC.
		2.A.3 – Provide copy of criteria and applications for selected projects in Annual Report.	Completed. See Appendix 2.A.
2.B	Promote and Implement Community Cleanup Programs.	2.B.1 – Partner with Operation Brightside to facilitate annual cleanups.	Completed. Due to COVID-19 many Operation Brightside activities were canceled. There were several other neighborhood cleanup activities with other groups. A summary of cleanup activities can be found in Appendix 2.B.

2. Public Involvement and Participation (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
2.C	Provide Assistance and Materials to Community Groups for participation in a Storm Drain Inlets Stenciling Program.	2.C.1 – Advertise the availability of a Storm Drain Stewardship Brochure.	Completed. Copy of the brochure was made available on the UG's website and distributed to all the sites where other brochures were placed.
		2.C.2 – Provide materials and areas for stenciling to participating groups.	Completed. Inlet markers, door hangers, and other application supplies were available for volunteer groups to use. Due to COVID-19 no requests for stenciling kits were made in 2020.
		2.C.3 – All storm drainage inlet castings manufactured w/ "Exits to River, Do Not Dump Waste".	Completed. All storm inlet castings are specified to have the required statement.
		2.C.4 – Document the number and name of groups, the number of inlets stenciled, and number of brochures distributed.	Completed. Due to COVID-19 no requests for stenciling kits were made in 2020.

3. Illicit Discharge Detection and Elimination

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
☒	☐	☐	Has a program/plan been developed and is it presently implemented to detect and address illicit/prohibited discharges into the MS4?
☐	☐	☒	Has a map of the MS4 been developed, showing the location of all outfalls, either pipes or open channel drainage, showing names and location of all streams or lakes receiving discharges from the outfalls? *
☒	☐	☐	The permit may require the permittee enact ordinances, or resolutions. Have ordinances, or resolutions, or regulations to prohibit non-stormwater discharges into the storm sewer system been enacted? Effective date: 06/02/05
☐	☒	☐	Have the ordinances, resolutions, or regulations been modified? Effective date:

List all the Illicit Discharge Detection and Elimination BMPs as identified in the SMP and provide the requested information in the following table

* The UG prepared a map that identifies Major Outfalls and receiving water bodies as described in the MS4 Permit and the UG SMP. The UG is in compliance with both.

3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
3.A	Evaluate, and if Necessary, Update Ordinances that pertain to Illicit Discharges.	3.A.1 – Prepare Memorandum regarding current ability of ordinances to perform IDDE inspections and take enforcement action.	Completed in 2013.
		3.A.2 – Legal Authority contained in Chapter 30 of UG's current Municipal Code of Ordinances included in Annual Report.	Completed in 2013.
3.B	Implement, & Revise if Needed, Standard Operating Procedures for Illicit Discharge Detection, Sampling, Tracking and Enforcement.	3.B.1 – Implement applicable existing Standard Operating Procedures (SOPs).	Completed in 2013.
		3.B.2 – Review and update if appropriate, all IDDE Program SOPs.	Completed in 2014.
		3.B.3 – Provide any updated SOPs in Annual Report.	Completed. No revisions in 2020.
		3.B.4 – Perform a review in 2018 of outfall inspection, dry weather sampling, inspection and tracking, and enforcement SOPs. Prepare a memo with results of review.	Completed in 2018

3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
3.C	Design, Implement and Maintain IDDE Program Tracking and Reporting System.	3.C.1 – Review maps and prepare list of major outfalls.	Completed in 2013.
		3.C.2 – Continue tracking of outfall inspections and dry weather sampling.	Completed. See Appendix 3.E.
		3.C.3 – Continue illicit discharge detection, tracking and enforcement activities.	Completed. Three (3) suspected illicit discharges were investigated in the MS4 area. Two were not found to be illicit (closed). One was illicit and corrected by the property owner. No enforcement was necessary. See Appendix 3.C.
		3.C.4 – Amend current stormwater maps to distinguish major outfalls from other nodes/outfalls.	Completed in 2014.

3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
3.D	Provide Training for IDDE Inspection Staff	3.D.1 – Conduct training session for key UG employees on identification of illicit discharges.	Training was held for staff of Water Pollution Control, Sewer Maintenance, Engineering, and Engineering Inspectors Nov. 4, 2020. See Appendix 3.D.
		3.D.2 – Provide in-house or commercial training for persons assigned to inspect, sample and track illicit discharges.	Training was held for staff of Water Pollution Control, Sewer Maintenance, Engineering, and Engineering Inspectors Nov. 4, 2020. See Appendix 3.D.
		3.D.3 – Provide copy of training materials and attendance sheet in Annual Report.	See Appendix 3.D.
3.E	Perform Dry Weather Screening of Stormwater Outfalls.	3.E.1 – Conduct at least 125 non-exclusive dry weather inspections per year of major outfalls.	Due to COVID-19, 59 major outfalls were inspected. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program. 16 outfalls had dry weather flows. All flows were field tested and no suspected illicit discharges were identified. See Appendix 3.E.
		3.E.2 – Evaluate the effectiveness of the outfall inspection program every 5th year (2017).	Completed in 2017.

3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
3.E (continued)	Perform Dry Weather Screening of Stormwater Outfalls.	3.E.3 – Provide list of all inspected outfalls, illicit discharges detected, types of illicit discharges discovered and how, any discharges that were eliminated, and enforcement action.	See Appendix 3.E.
3.F	Implement Program to Televise and Inspect Illicit Discharges/Cross Connections in UG's Storm and Sanitary Sewer Systems.	3.F.1 – Televise and review storm sewers CCTV information for illicit discharges and follow IDDE SOPs for any found illicit discharges.	Completed. See Appendix 3.F.
		3.F.2 – Televise 20,000 feet of sanitary sewers and review CCTV information for cross connections and follow IDDE SOPs for any found illicit discharges.	Completed. 367,776-ft of sanitary sewer lines were CCTV'd and 33,685-ft of storm sewer lines were CCTV'd. No illicit discharges or cross-connections were reported. See Appendix 3.F.
		3.F.3 – Review 20,000 feet per year of previously collected storm and sanitary sewer CCTV inspection videos to discover any illicit discharges/cross connections.	Removed from Stormwater Management Plan at the end of 2019.

3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
3.F (continued)	Implement Program to Televise and Inspect Illicit Discharges/Cross Connections in UG's Storm and Sanitary Sewer Systems.	3.F.4 – Provide a summary report including the number of linear feet of storm and sanitary sewer lines televised and number of illicit discharges or cross-connections that were detected and eliminated in Annual Report.	Completed. 367,776-ft of sanitary sewer lines were CCTV'd and 33,685-ft of storm sewer lines were CCTV'd. No illicit discharges or cross-connections were reported. See Appendix 3.F.
3.G	Maintain a Current Storm Sewer Mapping System.	3.G.1 – Convert all existing AutoCAD MS4 maps to a new GIS.	Completed in 2015
		3.G.2 – Annually update GIS maps from record drawings.	Completed. See Appendix 3.G.
3.H	Continue the UG's Existing Household Hazardous Waste Collection Program.	3.H.1 – Coordinate seven (7) HHW collection days every year.	Due to COVID-19 the UG only held three (3) events in 2020. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program. See Appendix 3.H.
		3.H.2 – Estimate amount of material collected at each event and list in the Annual Report.	Completed. 23.2 tons of household hazardous waste were collected. See Appendix 3.H.
		3.H.3 – Continue program to collect and dispose of abandoned tires.	Completed. 2,225 tires were collected by Street Maintenance Dept. and Police Department See Appendix 3.H.

3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
3.I	Engage commercial facilities that have potential to contribute pollutants to the MS4.	3.I.1 – Assess in 2018 the types of commercial facilities that may contribute pollutants to the MS4, assess level of effort and potential rewards in outreach to commercial facilities, and prepare a technical memorandum detailing the efforts necessary, results, and recommendations	Completed in 2018.
		3.I.2 – Select in 2018 and 2019 a group of commercial facilities to engage.	Completed in 2019.

4. Construction Site Stormwater Runoff Control

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
☒	☐	☐	The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development/redevelopment projects been enacted? Effective date:12/14/06
☒	☐	☐	Has a copy of the ordinances or resolutions been submitted to KDHE as required by the permit?
☒	☐	☐	Has a procedure or program been developed requiring construction site owners and/or operators to implement appropriate erosion and sediment control best management practices?
☒	☐	☐	Has a procedure or program been developed requiring construction site owners and/or operators to control waste such as discarded building materials, concrete truck washout, chemicals, paint, litter, and sanitary waste atconstruction sites likely to cause adverse impacts to water quality?
☒	☐	☐	Has a procedure been developed and implemented requiring site plan review which includes consideration of potential water quality impacts?
☒	☐	☐	Has a procedure been developed for the receipt andconsideration of information submitted by the public?
☒	☐	☐	Has a procedure been developed and implemented forconstruction site inspection and enforcement of the control measures?

List all the construction site stormwater runoff control BMP's as identified in the SMP and provide the requested information in the following table.

4. Construction Site Stormwater Runoff Control (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
4.A	Implement, & Revise if Needed, SOPs for SW Plan Review/Approval, Construction Site Inspections and Enforcement Activities.	4.A.1 – Implement applicable SOPs.	The UG began implementing in 2013.
		4.A.2 – Review and update, if appropriate, all Construction Site Program SOPs.	Completed in 2014.
		4.A.3 – Provide any updated SOPs in Annual Report.	SOPs were reviewed. No revisions were made to the SOPs.
		4.A.4 – Review in 2019 the SOPs for stormwater plan review, site inspections, and enforcement, prepare a technical memorandum detailing the results of the review, and modify SOPs if necessary.	Completed in 2019.
4.B	Continue to Utilize Tracking System for SW Plan Review/Approval, Construction Site Inspections and Enforcement Activities.	4.B.1 – Continue to use existing tracking system for all program activities.	Ongoing. See Appendix 4.B.
		4.B.2 - Report on activities under this program.	Completed. Due to ongoing upgrades to the tracking system, the UG is providing estimates of inspections and plan reviews.. The UG conducted an estimated total of 250 inspections in 2020. 65 plans were reviewed for stormwater quality and erosion and sediment control BMPs. See Appendix 4.B.

4. Construction Site Stormwater Runoff Control (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
4.C	Provide Training to UG's Erosion & Sediment Control (E&SC) Inspection Staff.	4.C.1 - Conduct training session for key UG employees on E&SC standards every 2 years.	Training on E&SC and Post-Construction STFs was held for UG staff. See Appendix 4.D.
		4.C.2 - Provide copy of table of contents of training materials and attendance sheet in Annual Report.	See Appendix 4.D.
4.D	Provide Training to Local Contractors and Owners.	4.D.1 – Sponsor a training session for local construction site owners, contractors, site operators, and installers.	Completed in 2019.
		4.D.2 Provide a copy of training materials and sign-in sheet in annual report.	Completed in 2019.
4.E	Conduct Routine Construction Site Inspections.	4.E.1 – Conduct inspection on a priority basis.	Completed.
		4.E.2 – Whenever practicable, conduct erosion control inspections within five working days of receiving complaints.	The UG continues to complete these types of inspections within five days.
		4.E.3 – Include a summary of inspection records in Annual Report.	The tracking software utilized by the UG for Code Enforcement is currently being upgraded. The UG is providing an estimate of inspections. See Appendix 4.E.

5. Post-Construction Site Stormwater Management in New Development and Redevelopment (Table)

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
☒	☐	☐	The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development and redevelopment projects been enacted? Effective date:5/6/10
☒	☐	☐	Has a copy of the ordinances or resolutions been submitted to KDHE as required by the permit?
☒	☐	☐	Has a post-construction stormwater runoff program been implemented?
☒	☐	☐	Have post-construction sites been inspected? *
☒	☐	☐	Are BMP's specified to minimize adverse water quality impacts?
☒	☐	☐	Have strategies been developed to include a combination of structural and/or non-structural BMP appropriate for the municipality?
☒	☐	☐	Have measures been implemented to ensure adequate long-term operation and maintenance of structural BMP's? *

List all the post-construction site stormwater management in new development and redevelopment BMPs as identified in the SMP and provide the requested information in the following table.

* The UG has a Post-Construction Site Stormwater Management Program that is consistent with the UG's SMP. Per the SMP, the UG is required to enforce annual operation and maintenance requirements for privately owned BMPs. The program is set up such that the owner is responsible for the inspection and maintenance of privately-owned post-construction facilities. The owner is required by ordinance to maintain and submit a report on maintenance and repairs to the facilities. The UG as part of its Construction Site Erosion and Sediment Control Inspections, inspects BMPs for compliance with plans and BMP standards.

5. Post-Construction Site Stormwater Management in New Development and Redevelopment (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
5.A	Maintain and Make Available Local Standards for Post-Construction Stormwater BMPs.	5.A.1 – Maintain and enforce local standards for post-construction SW management BMPs and post local standards and BMPs outlined in the standards on website.	Standards are enforced and posted on the UG website under Urban Planning and Zoning/Engineering. BMPs are posted as well.
5.B	Implement, & Revise if Needed, SOPs for SW Plan Review/Approval, Post-Construction Site Inspections and Enforcement Activities.	5.B.1 – Update applicable SOPs.	Completed in 2014.
		5.B.2 - Review and update, if appropriate, all Post-construction Site Program SOPs.	Completed in 2014.
		5.B.3 - Provide any updated SOPs in Annual Report.	SOPs were reviewed. No revisions were made.
		5.B.4 – In 2019, review SOPs and prepare summary memorandum.	Completed in 2019.

5. Post-Construction Site Stormwater Management in New Development and Redevelopment (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
5.C	Conduct BMP Site Inspections and Maintain a Tracking System for Post-Construction Sites.	5.C.1 - Maintain an inventory of existing publicly and privately owned BMPs.	Completed. See Appendix 5.C
		5.C.2 - Update tracking system for inspection and compliance.	Completed in 2013.
		5.C.3 - Conduct annual inspections of publicly owned BMPs.	Completed. See Appendix 5.C.
		5.C.4 - Enforce annual operation & maintenance requirements for privately owned BMPs.	UG ordinances require private sector owners to inspect and provide a report on inspection and maintenance activities bi-annually. Sixty (60) letters were sent to owners requesting reports. The UG received twenty-nine (29) reports from owners. The UG continues to pursue owner inspections and improve the program. See Appendix 5.C for summary.
		5.C.5 - Maintain tracking system to store BMPs inspection and enforcement activities.	Continuing to maintain and improve tracking. Lucity and GIS database are utilized for tracking and enforcement. See Appendix 5.C for summary.
		5.C.6 - Provide BMP Inventory list, inspection and enforcement summary in Annual Report.	Completed. See Appendix 5.C for summary.

5. Post-Construction Site Stormwater Management in New Development and Redevelopment (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
5.D	Provide Training to UG's Post-Construction BMPs Inspection Staff.	5.D.1 - Conduct training session for key UG employees on new BMP standards.	Training on E&SC and Post-Construction BMPs was held for UG staff. See Appendix 4.D.
		5.D.2 - Provide copy of training materials and attendance sheet in Annual Report.	See Appendix 4.D.
5.E	Develop Training Program For Local Property Owners, Designers and Developers on BMPs regarding maintenance and inspections.	5.E.1 - Sponsor a training session for architects/engineers/developers/contractors and owners of SW structural BMP sites every 2 years.	Completed in 2019.
		5.E.2 - Provide copy of training materials and attendance sheet in Annual Report.	Completed in 2019

6. Municipal Pollution Prevention/Housekeeping. (Table)

Please place an “X” in the left boxes to complete the table below.

YES	NO	N/A	
☒	☐	☐	The permit requires the permittee to enact a program to address pollution prevention/good housekeeping for Municipal Operations. Has such a program been enacted?

List all the municipal pollution prevention/housekeeping BMP’s as identified in the SMP and provide the requested information in the following table.

6. Municipal Pollution Prevention/Housekeeping. (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
6.A	Implement, & Revise if Needed, SOPs for Application of Pesticides, Herbicides and Fertilizers on UG Property.	6.A.1 – Continue to implement applicable SOPs.	Completed for 2020.
		6.A.2 - Review and update, if appropriate, all PHF SOPs.	Completed in 2014.
		6.A.3 - Review and modify lawn care maintenance specifications and contracts.	Completed in 2014.
		6.A.4 - Provide any updated SOPs, most recent PHF specifications, amounts applied, and list of certified contractors in Annual Report.	SOPs were reviewed, no revisions were made. Summaries can be found in Appendix 6.A.
6.B	Continue to Operate the UG's Existing Vehicle Washing Facility.	6.B.1 - Continue use of existing washing facility in accordance with SOP.	The facility was under repair for most of the year. The facility was used approximately 435 times. During periods when the facility was not in service, UG sent fleet vehicles to a local commercial carwash.

6. Municipal Pollution Prevention/Housekeeping. (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
6.C	Implement, & Revise if Needed, UG's Tracking System for Street Sweeping. Implement SOP for Street Sweeping Activities.	6.C.1 – Implement existing SOP. Track route classification and amount of material collected on a monthly basis.	Due to COVID-19 related constraints and furloughs, the quantities were considerably less than previous years. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program. Summaries of the materials collected can be found in Appendix 6.C.
		6.C.2 - Review SOP and tracking system, prepare memorandum on results of in-depth review.	Completed in 2014.
		6.C.3 - Use existing transfer station for street sweeping materials.	The UG no longer uses 50th Street and State Ave as a transfer station for street sweepings. The current transfer station for street sweepings is located at 47th St and Orville Avenue.
		6.C.4 - Provide list of monthly dates, route classifications, total amount of material collected per month, and copy of the latest procedures in Annual Report.	Completed. See Appendix 6.C.

6. Municipal Pollution Prevention/Housekeeping. (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
6.C Cont.	Implement, & Revise if Needed, UG's Tracking System for Street Sweeping. Implement SOP for Street Sweeping Activities.	6.C.5 - Provide any updated SOP in Annual Report.	The SOPs were reviewed and no revisions were made.
6.D	Provide Training to UG Employees on Good Housekeeping Activities and Information on Reducing Pollutants to the MS4.	6.D.1 - Prepare and distribute SW Pollution Prevention materials to employees via emails/website.	Completed. Pollution Prevention educational materials were distributed to UG employees through, social media, trainings and website.
		6.D.2 - Provide copy of all educational materials in Annual Report.	Completed. Materials can be found in Appendix 1.A, 1.C and 3.D
6.E	Continue Existing Curb Inlet Inspection and Cleaning Program.	6.E.1 - Perform approximately 5,000 curb inlet inspections per year.	Completed. 21,998 inlets/catch basins were inspected.
		6.E.2 - Continue to clean approximately 3,000 curb inlets per year.	Completed. 11,270 curb inlets/catch basins were cleaned.

6. Municipal Pollution Prevention/Housekeeping. (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
6.E (continued)		6.E.3 - Re-evaluate the effectiveness of current inspection and cleaning program.	Completed in 2015.
		6.E.4 - Provide summary report in Annual Report.	Completed. 21,998 inlets/catch basins were inspected and 11,270 curb inlets/catch basins were cleaned. No Illicit discharges or illicit connections were found.
6.F	Review & Revise if Needed, Tracking System for Curb Inlet Inspection/Cleaning Activities. Implement SOP for inlet inspections and cleaning.	6.F.1 - Implement existing SOPs.	SOPs were implemented.
		6.F.2 - Review, and update, existing tracking system, and incorporate into maintenance work order system.	Completed in 2014.
		6.F.3 - Review SOPs and prepare memorandum on results.	Completed in 2015.
		6.F.4 - Include updated SOPs in the Annual Report for the year they were updated.	The SOP was reviewed, and no revisions made.
		6.F.5 – Review inlet inspection and cleaning procedures and prepare a memo detailing the results. If necessary, modify SOP.	Completed in 2018.

6. Municipal Pollution Prevention/Housekeeping. (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
6.G	Create UG-owned/operated or UG-operated Buildings and Facilities Inventory. Review permit coverage and SWPPPs for regulated sites.	6.G.1 - Update existing UG-owned/operated or UG-operated buildings/facilities inventory.	Completed in 2015.
		6.G.2 - Verify those sites requiring State General Permit have one/review SWPPPs.	Completed in 2014.
		6.G.3 - Take appropriate action if a UG site is not covered by current State permit.	Completed in 2015.
		6.G.4 - Provide copy of inventory, departments contacted, and action any follow up action at sites in Annual Report.	Completed. The Fleet Maintenance Facility is currently up to date on its NPDES permit and following the existing SWPPP. The SWPPP will be updated in 2021. See Appendix 6.G.

6. Municipal Pollution Prevention/Housekeeping. (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
6.H	Monitor Good Housekeeping at Non-regulated UG Sites.	6.H.1 - Develop schedule to visit all non-regulated sites within 5 years.	Completed in 2014.
		6.H.2 - Continue visiting non-regulated sites and provide educational materials on good housekeeping practices.	Completed. Inspectors discussed management practices with the facility managers that can reduce pollution potential of these sites. Educational materials were provided. See Appendix 6.H.
		6.H.3 - Provide copy of schedule and educational materials in Annual Report.	Completed. See Appendix 6.H.

7. Industrial Stormwater Runoff Management Program (Table)

7. ***PHASE I OPERATORS ONLY*** - Monitoring Industrial and High-Risk Run-off

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Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
☐	☐	☒	Has the permittee developed and maintained a list of the municipal industrial facilities contributing to the pollutant loading to the MS4? *
☒	☐	☐	Have at least two municipal industrial facilities on the list had inspection and sampling conducted?
☐	☐	☒	If the answer to items 1 and 2 is "No," provide a statement.

* Consistent with the MS4 Permit and SMP, the UG has an industrial activity stormwater runoff management program to address industrial facilities consistent with 40 C.F.R. § 122.26(d)(2)(iv)(C) that the UG determines are contributing a substantial pollutant loading to the MS4. The UG has developed and maintained a list of the facilities within this group and is inspecting these sites as required by the Permit and SMP. The UG has answered the questions to the best of its ability given some inconsistencies between the questions and the specific requirements of the UG's program. The UG is in compliance with its Permit, ordinances, and SMP.

7. Industrial Stormwater Runoff Management Program (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
7.A	Develop SOPs for SW Plan Review/Approval, Industrial Site Inspections, Review of SW Control Measures, and Enforcement Activities.	7.A.1 - Create SOP for SW Plan Review/Approval by March 31, 2013.	Completed in 2013.
		7.A.2 - Create SOP for inspection of industrial sites by March 31, 2013.	Completed in 2013.
		7.A.3 - Create SOP for enforcement actions of violators by March 31, 2013.	Completed in 2013.
		7.A.4 - Include copy of SOPs in Annual Report.	Completed in 2013.
		7.A.5 – In 2019, review SOPs for plan review, inspection, and enforcement, prepare a technical memorandum of review, modify if necessary.	Completed in 2019.

7. Industrial Stormwater Runoff Management Program (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
7.B	Create and Maintain Industrial Facilities Inventory.	7.B.1 - Annually update industrial facilities registry to include those industries defined in 40 CFR 122.26(d)(2)(iv)(C) that the UG determines are contributing a substantial pollutant loading to the MS4.	Completed. No facilities were added to the registry in 2020. One facility (BPU Nearman Creek) was removed from the registry as it was found that stormwater did not enter the UG MS4. See Appendix 7.B.
		7.B.2 - Provide list in the Annual Report.	Completed. See Appendix 7.B.
7.C	Implement an Industrial Facility Inspection Program.	7.C.1 - Continue annually inspecting two sites on industrial registry.	Completed. Two facilities were inspected. All facilities were found to be compliant with NOI and SWPPP. See Appendix 7.C.
		7.C.2 - Train all UG personnel who will be conducting inspections.	Completed. IDDE training also satisfies this training requirement. See Appendix 3.D.
		7.C.3 - Include a summary of inspection conducted in the Annual Report.	Completed. Two facilities were inspected. All facilities were compliant with NOI and SWPPP. See Appendix 7.C.
7.D	Adopt Legal Authority for Inspection of Industrial Facilities, Review of Onsite Control Measures, and Enforcement.	7.D.1 - Review current Code of Ordinances and adopt any ordinance authorizing this program.	Completed in 2014.
		7.D.2 - Include copy of review results and ordinance activities in the Annual Report.	Completed in 2014

7. Industrial Stormwater Runoff Management Program (Table)

BMP ID Number	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)
7.E	Develop a program for monitoring industrial discharges to the MS4.	7.E.1 – Develop and maintain a list of industrial facilities consistent with 40 C.F.R. 122.26(d)(2)(iv)(C) that the permittee determines are contributing substantial pollutant loading to MS4.	Completed. See Appendix 7.B.
		7.E.2 – Annually sample stormwater at two high priority facilities.	UG sampled two facilities in 2020. Samples were obtained, and results were within acceptable limits. See Appendix 7.E.

E. Recordkeeping and Reporting

Some permittees are required to monitor surface waters if the permit includes TMDL monitoring requirements for Specific Impaired Streams or Lakes to Target within Part II of the permit. Provide a current map of monitoring locations.

Map and table of sample sites can be found in Appendix 9.C

F. Effectiveness of Source Controls and BMPs

The permit requires an annual report with an assessment of the appropriateness of implemented BMPs, progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable, and the measurable goals with an indication of the progress toward meeting the goals for each of the six minimum control measures.

On the following pages address:

1. Effectiveness of pollutant source controls, e.g. public education, identification and elimination of illicit discharges, and the construction site stormwater runoff control program.
2. Address all other BMPs implemented (generally the structural BMPs) under the stormwater management program and address their effectiveness.
3. Summarize water quality test results, if such testing has been conducted, and address any trends or outliers, i.e., unusually high or low pollutant concentrations. As the data is somewhat limited (perhaps only data over the past five years), definitive conclusions may not be possible, however, if trends are observed, some adjustment in the Stormwater Management Program (SMP) may be justified.
4. Address any SMP modifications which will be considered and possibly implemented in the next few years (up to five years).

F. RECORDKEEPING AND REPORTING - Part V of Permit – 2020

EFFECTIVENESS OF SOURCE CONTROLS AND BMPS

INTRODUCTION

The tables on the following pages address the reporting requirements to measure the effectiveness of the BMPs based on the evaluation criteria included in the SMP. The tables also summarize results for those applicable BMPs that include a data collection component. The following sections have been structured to follow the SMP for conformity with the Section (#) tables and appendices.

The tables are color coded. The measurable goals completed in previous year are in gray text and the BMPs and measurable goals which are new or revised in blue text.

APPROPRIATENESS OF BMPs (Permit Part V.A)

The BMPs are generally considered to be appropriate for the local population and pollution sources and no specific concerns have been identified.

RESULTS OF INFORMATION COLLECTED AND ANALYZED (Permit Part V.B)

The new permit requires the UG to sample E. Coli bacteria beginning in 2020. Based on the water quality results available it appears that the measures and BMPs are working; TMDL pollutants are declining slightly or holding steady despite increases in development within the County.

SUMMARY OF WATER QUALITY RESULTS

Generally, the results are consistent with previous years. There were a few sample results above normal range but most trends were downward or holding steady. The interpretations of the analysis of the stream sample locations can be summed up as follows.

Brenner Heights Creek

Sample results were consistent with previous years' results with one sample result slightly above normal range.

Little Turkey Creek

The sample results were all within normal range.

Barber Creek

This site is a new sample location for sampling per the Permit. Three of the four samples were within normal range with one sample result significantly higher. No cause was established for the spike and the UG will continue to monitor.

STANDARD OPERATING PROCEDURES (SOPs)

The UG continually reviews SOPs for effectiveness on a regular basis. Current SOPs are sufficient for the UG's needs.

SUMMARY OF PLANNED CHANGES

The UG is currently following the new Permit and has adjusted its plan accordingly. The sampling was successful and no further changes are necessary at this time.

1. Public Education and Outreach

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
1.A	Gather and Distribute Printed Stormwater Educational Materials.	Review #, type, and content of educational materials distributed and effectiveness of distribution methods. Consider developing or purchasing additional materials for UG's program.	The UG reviewed the materials and locations utilized in 2020 and deemed new materials and locations were not warranted at that time.
1.B	Deliver Televised Programs/Announcements on Stormwater Management/Water Quality on UG's Cable Channel.	Review viewership numbers and survey results.	The UGTV is no longer tracking the viewership numbers. The UG was unavailable to conduct a survey in 2020 due to COVID-19. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program. The UG broadcast 4 PSAs multiple times which increased awareness in the community. See Appendix 1.B.
1.C	Enhance Existing Website to Provide Information on Stormwater Issues.	Review number of website hits and downloads.	The UG is now using different analytics to measure engagement via social media. For 2020 20 posts (5% page total), 42,953 people reached (2% of page total), 2,811 people engaged. 10% is preferred. See Appendix 1.C.
1.D	Contribute Financially to Local Agencies within Wyandotte County Who Promote SW Management Improvements.	Review effectiveness of WCCD projects and activities to reduce pollutants to local storm sewers which reach area streams.	The projects and activities continue to be effective in reaching a broad audience. The projects and activities improve education and this education results in a reduction in the level of pollutants entering local storm sewers and streams. Unfortunately, due to COVID-19 there were fewer projects and opportunities in 2020. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program.
1.E	Contribute Financially to Regional Agencies Who Promote SW Education and Management Improvements.	Review effectiveness of MARC projects and activities to reduce pollutants to local storm sewers which reach area streams.	The projects and activities are effective in reaching a broad audience and are effective in reducing pollutants from entering local storm sewers and streams. See Appendix 1.E for report.
1.F	Utilize Local Newsletters for Education of SW Related Issues.	Review survey/questionnaire results for knowledge and changes in public behavior.	Due to COVID-19, the UG was unable to survey the public effectively at meetings or other public functions. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
1.G	Annual Review of Media Used for Public Outreach.	Review survey/questionnaire results.	Due to COVID-19 the UG was unable to survey the public effectively at meetings or other public functions. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program.
1.H	Create and Maintain a Stormwater Speaker Bureau.	Review surveys from events, evaluate level of interest, review number of attendees.	BMP removed at the end of 2019.
1.I	Conduct Outreach to Natural Stream Owners.	Review maps and data obtained and evaluate usefulness of information. Review level of interest through questioning property owners approached as part of effort.	As stated in the 2019 Annual Report, the UG decided to broaden its program to have a more positive impacts on the water quality of local streams and creeks. The UG reached out to those in the Brenner Heights Creek and Little Turkey Creek watersheds to educate them on stream degradation and what they could do to prevent it. An educational postcard was mailed to residents within the watersheds with streams running through their property. See Appendix 1.I

2. Public Participation and Involvement

2.A	Create a Stormwater Quality Education Grant Program.	Review number of Grant Applications received, funding distributed, and whether funding provides benefits and is well spent.	The program has proven to be effective. In 2020 the UG handed the program over to MARC to administer. Five applications were received, and all were awarded. All groups were affected by the COVID-19 pandemic and were forced to modify their original plans. A summary can be found in Appendix 2.A.
2.B	Promote and Implement Community Cleanup Programs.	Review the number of annual events, number of groups involved, types and quantity of trash collected.	This program is effective. Continued partnership with Operation Brightside and Livable Neighborhoods for neighborhood cleanups. Public Works also became aware that the UGPD also participates in community cleanups. See Appendix 2.C.
2.C	Provide Assistance and Materials to Community Groups for participation in a Storm Drain Inlets Stenciling Program.	Review progress towards completing the stenciling of inlets within the service area.	The UG continues to promote and provide materials to groups but due to COVID-19 there was a lack of groups interested in stenciling activities. See Appendix 2.C.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected

3. Illicit Discharge Detection and Elimination

3.A	Evaluate, and if Necessary, Update Ordinances that pertain to Illicit Discharges.	N/A	Completed in 2013.
3.B	Implement, & Revise if Needed, Standard Operating Procedures for Illicit Discharge Detection, Sampling, Tracking and Enforcement.	Review and revise SOPs as needed.	The SOPs have proven effective.
3.C	Design, Implement and Maintain IDDE Program Tracking and Reporting System.	Evaluate the system for effectiveness in capturing relevant data and providing sufficient reporting results.	Current system meets needs and is effective in capturing relevant data and providing reports. See Appendix 3.C.
3.D	Provide Training for IDDE Inspection Staff.	Analysis of data collected and feedback from personnel conducting ID investigations.	The training for staff is adequate for the UG's needs. See Appendix 3.D.
3.E	Perform Dry Weather Screening of Stormwater Outfalls.	Review effectiveness of SOPs in detecting illicit discharges in the service area.	SOPs are effective in evaluating discharges at major outfalls for suspected discharges.
3.F	Implement Program to Televise and Inspect Illicit Discharges/Cross Connections in UG's Storm and Sanitary Sewer Systems.	Review improvements in efficiency in reviewing CCTV data.	The CCTV of sewers has been implemented to the Maximum Extent Practicable. Implementation of software continues to improve tracking WPC operations. See Appendix 3.F.
3.G	Maintain a Current Storm Sewer Mapping System.	n/a	A map of the Storm Sewer System is located in Appendix 3.G
3.H	Continue the UG's Existing Household Hazardous Waste Collection Program.	Review the quantity of HHW collected each year.	COVID-19 caused the UG to the number of events from 7 to 3 which reduced the number of participants and collection quantities. See Appendix 3.H. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
3.I	Engage Commercial Facilities that Have Potential to Contribute Pollutants to the MS4.	Evaluate through surveys at events used to educate commercial facilities. Review maps and the potential pollution commercial facilities in the MS4.	Completed in 2019.

4. Construction Site Stormwater Runoff Control

4.A	Implement, & Revise if Needed, SOPs for SW Plan Review/Approval, Construction Site Inspections and Enforcement Activities.	Review and refine SOPs if changes are deemed necessary.	Current SOPs are effective at meeting UG's goals. No revisions were made.
4.B	Continue to Utilize Tracking System for SW Plan Review/Approval, Construction Site Inspections and Enforcement Activities	Evaluate the system for effectiveness in capturing relevant data, allowing query ability, and producing clear reporting results.	The system is adequate in capturing relevant data and reporting. The tracking system was undergoing upgrades at the time this report was being prepared. Accurate tallies were unavailable. Upgrades to the system are expected to improve tracking and reporting. See Appendix 4.B and 4.E.
4.C	Provide Training to UG's Erosion & Sediment Control (E&SC) Inspection Staff.	Review procedures and outcomes to ensure the E&S inspection staff are adequately and consistently evaluating and inspecting project sites that meet the regulations.	The inspection procedures are adequate to meet the needs of the UG. The results have improved each year. See Appendix 4.B and 4.E
4.D	Continue Training Program for Local Contractors and Owners.	Review evaluation and comments of attendees. Consider need for changes to future training.	Completed in 2019.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
4.E	Conduct Routine Construction Site Inspections.	Evaluate compliance of construction site owners and response to complaints.	The UG continues to improve on responding to complaints in an efficient manner. The Contractors have been improving on their compliance as efforts to enforce ordinances has improved.

5. Post-Construction Stormwater Management Program

5.A	Maintain and Make Available Local Standards for Post-Construction Stormwater BMPs.	Review standards and BMP information annually and update standards and BMPs as necessary.	APWA/MARC BMP committee is continuing to work on an updated BMP Manual. The UG will review for adoption after it is released. Current standards and applicability of BMPs will also be reviewed for cost effectiveness and maintenance issues owners have. As part of the Unified Green Policy Implementation, the UG will be finalizing the revised policy and any exceptions to the APWA/MARC BMP Manual. The UG will continue to utilize the 2009 MARC Manual For Best Management Practices For Stormwater Quality as its design standard.
5.B	Implement, & Revise if Needed, SOPs for SW Plan Review/Approval, Post-Construction Site Inspections and Enforcement Activities.	Review and refine SOPs if changes are deemed necessary.	The UG reviewed SOPs and deemed revisions unnecessary at this time. In 2020 the UG worked to revise Post-Construction ordinances which will be presented to Council in 2021. If the Council adopts the revisions, the r SOPs will be revised.
5.C	Conduct BMP Site Inspections and Maintain a Tracking System for Post-Construction Sites.	Evaluate the system for effectiveness in capturing relevant data, allowing query ability, and producing complete reporting results.	In 2020 the UG began utilizing Lucity and GIS to maintain and track the data. The system currently meets the UG's needs.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
5.D	Provide Training to UG's Post-Construction BMPs Inspection Staff.	Review procedures and outcomes of inspections for consistency and results.	Training can be found in Appendix 4.D
5.E	Develop Training Program For Local Property Owners, Designers and Developers on BMPs regarding maintenance and inspections.	Review evaluations and comments of attendees about the training. Assess whether changes are appropriate for future sessions.	Completed in 2019.

6. Pollution Prevention/Good Housekeeping at Municipal Facilities

6.A	Implement, & Revise if Needed, SOPs for Application of Pesticides, Herbicides and Fertilizers on UG Property.	Review and refine SOPs if changes are deemed necessary.	SOPs are effective. Parks and Recreation and subcontractors use minimal quantities of PHFs and apply only as directed by manufacturer. See Appendix 6.A
6.B	Continue to Operate the UG's Existing Vehicle Washing Facility.	Review effectiveness of wash water removal as it relates to water quality goals.	The UG continues to utilize the washing facilities and finds the facilities effective. All wash water drains to a separation tank then to the sanitary sewer system. This means that wash water is not discharging into the MS4 or local waterways. In 2020 the UG facility experienced breakdowns and the facility was not used as much. During the breakdowns, the UG fleet vehicles were sent to a nearby commercial facility to be washed.
6.C	Implement, & Revise if Needed, SOPs for Street Sweeping Activities.	Summary of miles swept, material collected, and review SOP for effectiveness.	SOPs are effective. Street sweeping is very effective in removing sediment that may otherwise enter the MS4. Typically, the number of miles swept and materials collected are consistent year to year. However, due to COVID-19 and furloughs the lane miles and materials collected were reduced in 2020. See Appendix 6.C. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
6.D	Provide Training to UG Employees on Good Housekeeping Activities and Information on Reducing Pollutants to the MS4.	Employee feedback and comments and observed behavior changes.	The training and educational materials have been effective. The UG has seen changes in behavior and increased knowledge from those who have received emails and received attended the various trainings/education opportunities offered. See Appendices 1.A, 1.C and 3.D.
6.E	Continue Existing Curb Inlet Inspection and Cleaning Program.	Summary of prioritization, inspection techniques, cleaning reports. and SOP	This program is effective. Curb inlets are visited and cleaned in a proactive manner. Conditions and cleanings are tracked in GIS and Lucity database. Due to COVID-19 and furloughs the number of inlets cleaned and inspected were reduced. See Appendix 6.E. *See* Executive Summary for more details on COVID-19 impacts on the UG stormwater program.
6.F	Implement, & Revise if Needed, Tracking System SOPs for Curb Inlet Inspection/Cleaning Activities. Implement SOP for Inlet Inspections and Cleaning.	Annually review and refine the SOP and the efficiency of inlet inspection and cleaning plan.	This program is effective. The UG reviewed the program and no revisions were made to the SOPs.
6.G	Create UG-owned/operated or UG-operated Buildings and Facilities Inventory.	Review whether all sites required to have NPDES coverage are current on their NPDES Permit and SWPPP.	The Fleet Maintenance Facility is currently under an NPDES Permit. The SWPPP will be updated in 2021. The existing SWPPP is being followed until a revised SWPPP is prepared. WWTP 20 completed improvements to the facility and is currently covered by a "No Exposure" Certification. See Appendix 6.G.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
6.H	Monitor Good Housekeeping at Non-regulated UG Sites.	Review educational materials and if deemed necessary, make needed improvements in information provided.	The facilities associated with the Buildings and Logistics were visited in 2020. Educational materials distributed were reviewed and found to be effective through behavior changes and site cleanliness since visits in 2015. See Appendix 6.H.

7. Industrial Activity Stormwater Runoff Management

7.A	Develop SOPs for SW Plan Review/Approval, Industrial Site Inspections, Review of SW Control Measures, and Enforcement Activities.	Review and refine SOPs if changes are deemed necessary.	SOPs were reviewed, no revisions were deemed necessary.
7.B	Create and Maintain Industrial Facilities Inventory.	Completion of list of industrial facilities in service area as required by SMP.	The UG has been effective at maintaining an updated list of industrial facilities in the service area as required by the SMP. Current methods are effective for updating the Registry. See Appendix 7.B
7.C	Implement an Industrial Facility Inspection Program.	Summary of Compliance of facilities with the UG's ordinances.	Two facilities were inspected in 2020 and the facilities were compliant with requirements. See Appendix 7.C

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
7.D	Adopt Legal Authority for Inspection of Industrial Facilities, Review of Onsite Control Measures, and Enforcement.	N/A (completed in 2014)	N/A
7.E	Develop a Program for Monitoring Industrial Discharges to the MS4.	Summary of the results of stormwater sample analysis and compare to comparable wet weather monitoring in the area.	UG sampled two facilities in 2020. Sample results were within acceptable parameters. See Appendix 7.B.

8. Total Maximum Daily Load (TMDL) Regulated Pollutants

8.A	Develop and Implement BMPs to Reduce TMDL Regulated Pollutants, to the Maximum Extent Practicable, from Entering the Kansas River.	Reductions in bacteria (E. coli) concentrations.	The sample results continue to show a slight decline in bacteria concentrations based on the years sampling has occurred. See Appendix 9.C.
8.B	Undertake Activities to Reduce Stormwater Impacts on Wyandotte County Lake.	Evaluate parameters, Secchi disk, and sediment data for effect on pollutants entering WYCO Lake. Modify program as appropriate. Evaluate plan to assess significant sources of phosphorus to Lake.	Secchi Disk readings were consistent with previous years results. The new Permit removed Wyandotte County Lake from the TMDL and wet weather monitoring in 2020. Current trends can be found in Appendix 9.C.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
8.C	Develop and Implement BMPs focused on the Little Turkey Creek (LTC) and Brenner Heights Creek (BHC) Watersheds as proxies for the Kansas River.	Evaluate the TMDL parameters reported in Wet Weather Monitoring for any significant change in concentrations of nutrients, sediment and bacteria.	The results of Wet Weather Monitoring indicate slight reductions or consistent concentrations. This is despite the increase of development in Wyandotte County.
8.D	Assess BMPs focused on LTC and BHC watersheds targets as proxies for Kansas River.	Evaluate the TMDL parameters reported in Wet Weather Monitoring as compared to wet weather monitoring results for nutrients, sediment and bacteria.	The watershed results can be found in Appendix 9.C.

9. Wet Weather Monitoring

9.A	Implement SOPs to address monitoring of Water Quality Parameters.	Review and refine SOPs if changes are deemed necessary.	The current SOPs for wet weather monitoring are effective. Based on the UG's review, no revisions are deemed necessary at this time.
9.B	Develop Tracking System for Wet Weather Monitoring Activities.	Review tracking system for clarity, usefulness and reliability of information.	The tracking system is effective, clear, useful and reliable.
9.C	Conduct Water Quality Analyses of SW Discharges to Assess Effectiveness of Implemented BMPs.	Evaluate trends to assess water quality impacts and review possible changes to BMPs and stormwater management activities, if required.	The UG finds its existing program to be effective at reducing pollutants to the MEP. Sample results are typical for the area and no changes to BMPs or the stormwater management program in general are justified. See Appendix 9.C.

BMP #	Brief Description	Evaluation Methodology	Appropriateness and Summaries of Information Collected
9.D	Perform sampling activities at Wet Weather Monitoring Sites.	Review sampling strategies, sample machine performance and acquisition by UG personnel. Make modifications to the system if appropriate	Sampling strategies were very successful. The UG obtained all required samples in accordance with the 2020 Permit. No modifications are necessary.

10. Stormwater Management Program

10.A	Hire a Stormwater Coordinator	N/A	
10.B	Create SW Executive Committee to Provide Administrative Oversight, Coordination and Direction.	PW Director or designee to determine if committees are effective in implementing the SMP.	The Stormwater Executive Committee determined that committees were not necessary for 2020.
10.C	Conduct an Annual Financial Analysis of the SW Program.	N/A	

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system to assure that qualified personnel properly gather and evaluate the information submitted. 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 *fine and imprisonment for knowing violations*."

Signature of Permittee: _____.

(Legally responsible person)

Name Printed: Jeff Fisher **Title** Executive Director of Public Works

40 CFR 122.22 Signatories to permit applications and reports.

(a)Application. All permit applications shall be signed by either a principal executive officer or ranking elected official.

All reports required by permits, and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person.

Please note the submission requirements on page 1. Submit this report to:

KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT

Municipal Programs Section

1000 SW Jackson Street, Suite 420

Topeka, Kansas 66612