

Stormwater Management Plan

Unified Government of Wyandotte County | Kansas City, KS

2021



Unified Government of Wyandotte County
/Kansas City, Kansas

A handwritten signature in blue ink, appearing to read 'Jeff Fisher'.

Jeff Fisher
Public Works Director

12/9/2020

Date

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Introduction

The Unified Government of Wyandotte County/Kansas City, Kansas' (UG) municipal separate storm water system (MS4) Stormwater Management Program (SMP) has been developed in compliance with Kansas Water Pollution Control MS4 Permit and Authorization to Discharge under the National Pollutant Discharge Elimination System (Kansas Permit No. M-MO25-SO01/Federal Permit No. KS0095656).

The SMP is intended to be detailed with respect to procedures and protocols for implementing the stormwater best management programs to ensure UG personnel in the various departments and divisions have ample guidance and instruction. The SMP will also allow the UG to allocate financial resources in an efficient and effective manner, consistent with the objectives of the NPDES permit issued with an effective date of February 1, 2020.

As the Nation and the State continue to battle COVID-19, the UG is working diligently to comply with the terms of our MS4 permit, including developing and submitting a new SMP to KDHE. However, we do foresee the possibility that the UG may face future challenges, including potential delays, in complying with certain Best Management Practices (BMPs) in the permit and SMP.

For example, Minimum Control Measure (MCM) 1 - Public Education and Outreach includes BMPs that require in-person events, training, etc. Given the current trajectory of COVID-19 cases across the U.S. and the likely phased roll-out of a vaccine during 2021 (and perhaps into 2022), it may be difficult or impossible to conduct stormwater outreach at large public events (BMP# PE&O-09) for months to come.

The UG has attempted to mitigate these issues by choosing BMPs for each MCM that can be implemented under the current restrictions. For example, we have chosen to implement BMP #PE&O-02, Distribute educational materials, because the UG can do so without interacting with a sizeable population at a local venue.

In addition, although the UG has a very talented workforce, and we are proud of the work we do as KDHE's local partner on the front lines of protecting clean water statewide, we may face potential compliance challenges relating to the reduced availability of staff, contractors, and laboratories. Any shortages could impact our ability to implement our MS4 BMPs. We sincerely hope this will not be the case, but, if challenges materialize, we would appreciate KDHE's recognition of these difficulties.

If/as we become aware of specific delays for MS4 activities or projects we will provide supplemental notices to your attention.

The SMP is a comprehensive program to manage the quality of stormwater discharged from UG's storm sewer system. The content of the SMP is based on the requirements of the KDHE permit for the MS4. The SMP addresses the following permit requirements:

- Public Education and Outreach
- Public Involvement / Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management in New Development and Redevelopment Projects
- Pollution Prevention/Good Housekeeping for Municipal Operations
- Total Maximum Daily Load (TMDL) Best Management Practices and Surface Water Monitoring

As part of the SMP, several Standard Operating Procedures (SOPs), referenced in the document below, have been developed and implemented in a manner that meets the requirements of the UG's MS4 permit. SOPs are internal documents prepared by the UG that provide guidance to UG staff as implementation of the permit moves forward. The UG will review and update the SOPs as the UG updates its programmatic efforts and on an as-needed basis. The UG will note any significant updates in the annual reports.

Best management practices (BMPs) have been included in the SMP to reduce pollutants to the maximum extent practicable. Such BMPs may be modified by the UG where appropriate to achieve program objectives and to accommodate the UG's administration of the storm water management program.

Federal regulations (40 CFR 122.26(b)(8)) define a municipal separate storm sewer system (MS4) as: "a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian Tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States; (ii) Designed or used for collecting or conveying storm water; (iii) which is not a combined sewer system; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2."

EPA and the state are authorized to regulate discharges from the MS4 owned or operated by UG as a point source under the Clean Water Act. Although some programs are undertaken for the entire area, the SMP is meant to address the MS4 service area (hereinafter, "service area"). The service area is comprised of those properties that discharge stormwater into the UG stormwater system. For reference, the MS4 Permit issued to the UG effective February 1, 2020 refers to the areas within UG's jurisdiction served by the permittee's MS4 as the "Permit Area." The Permit Area is the functional equivalent to the "service area" referenced herein. The service area does not include properties that are served by UG's combined sewer system (largely comprised of areas in the eastern part of the UG geographical area, including, the following watersheds: Fairfax Industrial District, Esplanade Creek, Jersey Creek, Splitlog Creek, Central Industrial District, Muncie Bluff Creek, Armourdale, parts of Argentine, parts of Turkey Creek, Brush Creek,

and Matoon Creek). It does not include properties that discharge stormwater into stormwater conveyance systems pursuant to separately-issued NPDES permits, properties that discharge stormwater directly into local waterbodies (direct dischargers), or properties located within the City of Bonner Springs, the City of Edwardsville, within in Delaware Township (unincorporated, not within the urbanized area), and the City of Lake Quivira. UG notes that the service area will be further refined with future updates to the existing maps of the MS4. A map of the current MS4 service area is included in the appendices to this SMP.

Modifications to BMPs and the Stormwater Management Program Document

For minor BMP modifications/replacement: Within 60 days of a determination by the permittee or date of written notification from KDHE, the permittee shall modify the BMP if modifications are needed to maintain a program in compliance with this permit.

For major BMP modifications/replacement: These major modifications are defined as ones which normally take more than 60 days to construct and/or implement. Within 60 days of a determination by the permittee or date of notification from KDHE, the permittee shall provide a plan and schedule for the upgrade/replacement of the BMP. The plan and schedule are subject to KDHE approval.

The SMP shall be evaluated annually and, if revisions are necessary, the modified SMP document shall be submitted with the annual report due to KDHE by February 28 of each year.

MINIMUM CONTROL AND PERFORMANCE MEASURES

1. Public Education and Outreach

The UG shall continue to 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.

The implementation of BMPs for this minimum control measure must result in accumulation of a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The point total requirement increases to 7 points for each calendar year beginning in 2023. The table below lists various BMPs, measurable goals, and the required timing-period or implementation-schedule to qualify for the points in the year. The UG has added a column (not provided in the permit) that explains how the UG will document compliance with the measurable goal for each BMP. For each of the BMPs that follow in this SMP, the UG will keep documentation on file in-house for the retention period identified in the permit.

The UG has chosen to implement BMPs 1, 2, 3, 5, 6, 9, 10, and 12 to accumulate the points required by the permit. The UG will choose from among those BMPs implemented to claim points as needed for compliance with the permit and include only those in the Annual Report. The UG will update this SMP in future years to add implementation efforts to comply with the 7 points required.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PE&O-01	Maintain a stormwater webpage for the permittee.	Maintain the webpage with up to date information with all links effective and valid information. Check all links and update website as necessary on a minimum monthly basis. Document monthly checks in logbook and indicate changes with logged summaries.	The webpage must be available throughout the year once it is posted and initially made available. In the initial year posted it must be available for a minimum of 3 months to qualify for the points. In subsequent calendar years, the points may be claimed if the webpage has been maintained throughout the twelve months.	<p>3 points can be claimed in the first year implemented, and</p> <p>2 points can be claimed for each successive year the webpage is maintained available.</p>	Monthly check in logbook and a summary of changes made to the website during the previous month.
PE&O-02	Distribute educational materials (either flyers, brochures, catalog mailings, handouts, or emails) addressing various pertinent stormwater public education topics.	Number of all flyers, brochures, catalog mailings, handouts, or emails distributed in a year shall equal or exceed the most recent U.S. Census Bureau decennial housing units value for the permit area. The applicable U.S. Census housing units value shall be documented, and the number of flyers, brochures or emails distributed shall also be documented. This information and copies of the flyers, brochures or emails shall be retained on file.	Either flyers, brochures, catalog mailings, handouts, or e-mails are to be distributed in at least two separate batches, ideally in separate seasons (either winter, spring, summer or fall). However, the required number of flyers, brochures, or e-mails must be distributed in a single calendar year and the points can be claimed for that year.	2 points may be claimed in a year in which the required number of flyers, brochures, catalog mailings, handouts, or e-mails are distributed.	Quantity of educational materials distributed. Copy of materials. Census housing units' value for the permit area.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PE&O-03	Provide either training or educational materials to permittee identified businesses at high risk of contributing to stormwater pollution. Such businesses can include, but are not limited to, food service, auto service, disaster response and janitorial services. The training or educational materials shall address best management practices they can employ to minimize or avoid adverse stormwater impacts due to their operations.	<p>Training or educational materials must be provided, within the year, to at least five separate businesses if the population of the municipality is greater than 10,000, or three businesses if the population of the municipality is between 3,000 and 9,999, or two separate businesses if the population of the municipality is less than 3,000.</p> <p>There is no requirement to provide training to business in separate business categories, although it is allowed.</p>	The required amount of training or distribution of educational materials must occur within the year for which points are claimed.	2 points may be claimed in any year in which the required amount of training or distribution of educational material occurs.	Copy of Agenda, sign in sheet is used or mailing list and educational materials distributed.
PE&O-05	Post the municipalities MS4 permit and SMP document on either the stormwater web page or the municipal webpage.	The two documents must be posted for at least six months of the year to claim one point.	Months for which the posting occurs must be within the year for which points are claimed. No "carryover" of months from one year to the next.	1 point may be claimed for posting each year (minimum of at least 6 months)	Screenshot of posted items.
PE&O-06	Provide either a stormwater telephone hotline or web based or text message method for public reporting of illicit discharges.	Respond to all reported complaints within 10 days and, if found valid, resolve, or establish a schedule for resolution within 20 days. Actual resolution may take more than 20 days, but the	The hotline/reporting system must be available to the public for at least six months in the year to claim the points.	2 points can be claimed for each year the hotline / reporting system is maintained and available.	Summary of complaint call and text responses, resolutions, and dates

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PE&O-06 (Cont.)		<p>schedule for resolution must be finalized and the efforts to implement resolution must begin within 20 days following receipt of complaint. Document complaints and response/resolution process for all complaints received in the year.</p> <p>Resolution of an illicit discharge can include, but is not limited to; elimination of the discharge; on-site treatment to allow discharge to the MS4 (normally requires an NPDES permit); redirecting the discharge to a location that the discharge is not considered illicit, i.e., sanitary sewer or to holding tanks to allow the waste to be hauled off for appropriate treatment, reuse/recycle or disposal.</p>		<p>An additional point may be claimed for each illicit discharge resolved in the year up to a limit of 2 additional points per year. One point allowed per illicit discharge resolved</p>	
PE&O-09	<p>1. Operate an information booth at a large public event, (such as a sports event, fair, or music festival) where at least an estimated 1,000 or more individuals attend.</p>	<p>Provide information about stormwater topics of current interest.</p>	<p>All events shall have the booth staffed by the permittee for at least 50% of the days the event occurs.</p>	<p>2 points may be claimed each year this BMP is implemented in compliance with the specified requirements for alternative 1. (1,000 or more attendees) or alternative 2. (3,000 attendees).</p>	<p>Summary of events attended, rough estimate of attendance, theme or synopsis of the information provided to public.</p>

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
	<p>2. Alternately, operate an information booth at multiple public events, (such as a sports event, fair, or music festival) where a cumulative estimated total of 3,000 or more individuals attend.</p> <p>3. And finally, a single point can be claimed for operating an information both at a public event where at least an estimated 200 or more individuals attend.</p>			<p>1 point may be claimed each year this BMP is implemented in compliance with the specified requirements for alternative 3 (200 attendees).</p>	
PE&O-10	<p>Provide either training or educational materials to lawn/turf care service entities addressing best management practices they can employ to minimize or avoid adverse stormwater impacts due to their operations.</p>	<p>Training or educational materials must be provided, within the year, to at least five lawn/turf care service entities or at least 20% of the lawn care service entities located in the municipality whichever is least.</p>	<p>The required amount of training or distribution of educational materials must occur within the year for which points are claimed.</p>	<p>2 points may be claimed in any year in which the required amount of training or distribution of educational material occurs.</p>	<p>Copy of educational materials distributed and mailing list.</p>
PE&O-12	<p>Create a stormwater information brochure to provide to the public at public meetings and/or hearings</p>	<p>Have multiple copies of the brochure available during at least 10 meetings or hearings open to the public during the year. Provide the brochures to the public at no charge.</p>	<p>The brochures shall address stormwater topics of concern.</p>	<p>1 point may be claimed in any year the brochures are made available to the public at meetings and/or hearings as required.</p>	<p>Copy of brochure, locations they are available, and list of Commission meetings where they were distributed.</p>

2. Public Involvement/Participation

The UG shall continue to implement a public involvement and participation program to solicit public comments and recommendations regarding the BMPs and measurable goals utilized by the UG to comply with the permit. The UG shall comply with State and local public notice requirements when implementing a public involvement and participation program.

The implementation of BMPs for this minimum control measure must result in accumulation of a minimum of 3 points total on an annual basis for each calendar year 2021 and 2022. The point total requirement increases to 6 points for each calendar year beginning in 2023. The table below lists various BMPs, measurable goals, and the required timing-period or implementation-schedule to qualify for the points in the year. The UG has added a column (not provided in the permit) that explains how the UG will document compliance with the measurable goal for each BMP.

The UG has chosen to implement BMPs 6, 9, and 10 to accumulate the points required by the permit. The UG will choose from among those BMPs implemented to claim points as needed for compliance with the permit and include only those in the Annual Report. In the table below, the UG explains for each of the BMPs implemented during calendar year 2021 how it will implement the BMP. The UG will update this SMP in future years to add implementation efforts to comply with the 6 points required.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
P I/P-06	Establish a program to encourage residents to install stormwater treatment best management practices on their property.	Encouragement can include funding, grants, and other financial incentives, trainings and or giveaways. Stormwater treatment BMPs can include: rain barrels, rain gardens, native plantings, native trees, cisterns and vegetated swales. Record participation numbers annually.	One or more of the listed methods of encouragement must be implemented in the year for which points are claimed.	<p>2 points may be claimed each year this BMP is implemented in compliance with the specified requirements, with the addition of</p> <p>1 additional point (for a total of 3 points in the year) each year that participation increases 10% from the previous year.</p>	Screenshot of webpage explaining the program, list of properties that participated identified by street name (no identifying information), type of stormwater treatment facility that was installed, and amount of money reimbursed, if applicable.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
P I/P-09	<p>Distribute stormwater educational materials to the public within this permit area.</p> <p>Alternately, the permittee may provide stormwater educational materials, e.g. brochures, flyers, or pamphlets. These materials may address various stormwater topics. For this alternative, these materials may be provided to other nearby municipalities for distribution to the public. The nearby municipalities must be within 30 miles from this permit area.</p>	<p>The educational materials, for each topic, which are distributed or supplied must have a value of at least \$50. Topics may be anything related to stormwater including but not limited to clean-up guidance following flooding, discouraging littering, explaining and discouraging illicit discharges to the storm sewers, guidance on constructed BMPs for home owners (rain gardens, rain barrels, etc.) guidance on area household hazardous waste receiving centers, and guidance on area recycling programs.</p>	<p>For educational materials distributed or provided to nearby municipalities each year points may be claimed when materials are provided with equal or greater value as required for each separate topic.</p>	<p>1 point may be claimed per topic addressed in compliance with the requirements, up to a total of 5 points/topics.</p>	<p>Copies of the brochures distributed, list of locations where they were available to the public.</p>
P I/P-10	<p>Establish a program to employ (either paid or unpaid) high school or college age environmental interns in an environmental related program including but not limited to either the wastewater utility, stormwater utility, potable water utility or solid waste utility.</p>	<p>The intern must receive the same environmental related training a new full-time employee would receive, within the first six months of the full-time employee's employment, during their internship.</p>	<p>The internship must last at least 8 weeks in the year when points are claimed.</p>	<p>2 points may be claimed each year this BMP goal is achieved per intern.</p>	<p>Summary of intern information, VISTA program, training received, work activities, and dates employed.</p>

3. Illicit Discharge Detection and Elimination

The UG shall:

- a. Continue to implement and enforce a program to detect and eliminate illicit discharges into the MS4.
- b. Maintain a storm sewer system map of the permittee's MS4, showing the location of all known outfalls, either pipes or open channel drainage, showing the names and location of all streams or lakes receiving discharges from those outfalls.
- c. Continue to implement and enforce an ordinance to prohibit non-stormwater discharges into the storm sewer system and implement appropriate enforcement procedures and actions.
- d. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- e. Develop and implement a plan to detect/inspect for and address prohibited non-stormwater discharges, including illegal dumping, to the storm sewer system. The plan must include efforts to identify and evaluate dry weather MS4 discharges to detect and eliminate any associated illicit discharge. Unless identified by either the permittee or KDHE as a significant source of pollutants to waters of the state, several types of non-stormwater flow are not normally prohibited from entering the Municipal Separate Storm Sewer System:

Discharges which are not necessarily prohibited include:

- I. Water line flushing
- II. Diverted stream flows
- III. Rising ground waters
- IV. Uncontaminated groundwater infiltration as defined under 40 CFR 35.2005(20) to separate storm sewers
- V. Uncontaminated pumped groundwater
- VI. Contaminated groundwater if authorized by KDHE and approved by the municipality
- VII. Discharges from potable water sources
- VIII. Foundation drains
- IX. Air conditioning condensation
- X. Irrigation waters
- XI. Springs
- XII. Water from crawl space pumps

- XIII. Footing drains
- XIV. Lawn watering
- XV. Individual residential car washing
- XVI. Occasional not-for-profit car wash activities
- XVII. Flows from riparian habitats and wetlands
- XVIII. Dechlorinated swimming pool discharges excluding filter backwash
- XIX. Street wash water (excluding street sweepings which have been removed from the street)
- XX. Discharges or flows from firefighting activities
- XXI. Heat pump discharge waters (residential only)
- XXII. Treated wastewater meeting requirements of an NPDES permit
- XXIII. Sump pump drains
- XXIV. Other discharges determined not to be a significant source of pollutants to waters of the state, a public health hazard or a nuisance.

- f. The implementation of BMPs for this minimum control measure must result in accumulation of a minimum of 5 points total on an annual basis for calendar years 2021 and 2022. The point total requirement increases to 7 points for each calendar year beginning in 2023. The table below lists various BMPs, measurable goals, and the required timing-period or implementation-schedule to qualify for the points in the year.

The UG has added a column (not provided in the permit) that explains how the UG will document compliance with the measurable goal for each BMP.

The UG has chosen to implement BMPs 2, 3, 4, 5, 6, 8, 9, and 10 to accumulate the points required by the permit. The UG will choose from among those BMPs implemented to claim points as needed for compliance with the permit and include only those in the Annual Report. In the table below, the UG explains for each of the BMPs implemented during calendar year 2021 how it will implement the BMP. The UG will update this SMP in future years to add implementation efforts to comply with the 7 points required.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
IDDE-02	Implement a program to abandon failed or failing residential or commercial on-site wastewater treatment facilities. These on-site wastewater treatment systems such as septic tank – lateral systems or lagoon systems are then connected to the municipal wastewater collection system for treatment of wastewater at the municipal wastewater treatment plant.	Redirect the wastewater generated by the facility to the municipal wastewater treatment collection system for proper treatment and disposal.	For each failed or failing on-site system which is abandoned, and the wastewater is redirected to the municipal wastewater treatment system, the permittee may claim points in the year the system is initially connected into the municipal wastewater treatment system.	3 points may be claimed for each abandoned system in the year it is abandoned, Alternately for systems which are upgraded or replaced as per the requirements a total of 2 points may be claimed in the year upgrade or replacement is completed.	Summary of failed or failing on-site wastewater treatment facilities, resolutions, and dates of resolutions
	Alternately, upgrade or replace the failed system to restore performance.	Alternately, upgrade or replace the failed system with improvements which meet or exceed the present code or local requirements.	Alternately, for systems which are upgraded or replaced to restore adequate performance a lower number of points may be claimed in the year the upgrade or replacement is completed.		

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
IDDE-03	Develop a spill response plan and, if appropriate, coordinate emergency response with other agencies or organizations.	The plan shall include, at a minimum, explanation of appropriate spill response activities for spills associated with vehicle accidents, at grade or above ground storage tanks, and vehicle fluids from mechanical equipment such as construction equipment, cars, or trucks. The written plan shall be maintained on file.	The plan may be implemented in any year and points claimed for the initial implementation or for each year the plan remains effective.	3 points may be claimed in the year initially implemented, and 2 points may be claimed for each successive year the plan remains effective.	Copy of spill response plan the year it is implemented in and any revision in year it is revised.
IDDE-04	<p>Implement a program to evaluate MS4 outfalls to identify illicit discharges. Inspect at least 5% of the known MS4 outfalls during a calendar year and evaluate the ones which have dry weather discharges. Evaluate the water quality of the dry weather discharges to recognize non-stormwater contributions and trace the source of any illicit discharge.</p> <p>* Over the past 6 years the UG has only identified a handful of suspected illicit discharges and one confirmed illicit discharge at outfalls under CFR</p>	When at least 5% of the known MS4 outfalls are inspected and for which at least one outfall was identified as discharging (entirely or partially) flow from an illicit discharge, the allotted points may be claimed in the year when the illicit discharge is eliminated. Document the MS4 outfalls inspected, the outfalls with dry weather discharges and the MS4 outfalls associated with illicit discharges.	The evaluation of a group of at least 5% of the known MS4 outfalls may be completed all in one year or may occur in up to two consecutive years and a point can be claimed. The larger number of points may be claimed only for the year in which the illicit discharge(s), associated with this group of evaluated outfalls is/are eliminated.	1 point may be claimed in the year when a total of at least 5% of the known MS4 outfalls are finally inspected, and 2 additional points may be claimed in which the illicit discharge(s), associated with this group of evaluated outfalls is/are eliminated.	MS4 outfalls inspected, outfalls with dry weather discharges, MS4 outfalls associated with illicit discharges.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
	definitions. In order to increase the probability of locating an illicit discharge, the UG will henceforth consider outfalls to be defined as structures within the storm sewer system and not the ends of a pipe system, which is similar to neighboring municipalities. This definition will better reflect the level of effort that the UG invests in identifying illicit discharges.				

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
IDDE-05	Distribute a letter (or flier) and/or e-mail along with a press release from a municipal official with the intent of reaching every resident and business in the MS4 permit area. The distributed documents shall provide information on how to avoid illicit discharges to the MS4, i.e., proper disposal methods for common substances or materials often discharged illicitly. Provide a link to the municipal website where applicable ordinances and disposal guidance are posted.	The letter (or flier) and/or e-mail along with the press release shall highlight the requirements for proper disposal of wastes and disposal methods. Copies of these documents shall be retained on file along with the distribution/ mailing lists to document distribution to the target area (minimum MS4 permit area) to avoid illicit discharges to the MS4. Provide a link to the municipal website where applicable ordinances and disposal guidance are posted.	The distribution of these various documents, letter (or flier) and/or e-mail along with the press release, shall all occur in the same month. Permittee may claim these points in the year these documents are distributed.	2 points	Copy of letter/flier/email, and website link (Maintain a mailing list for distribution)

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
IDDE-06	Inspect, by televising pipelines or direct visualization of open channel drainage, 2% of the MS4 system within the permit area all conducted within a 12-month period to aid in identifying illicit discharges as well as evaluate the condition of the storm sewer lines/drainage channels-ditches. If in a 12-month period 10% of the MS4 system is inspected a higher point value may be claimed.	Generate a summary report of the inspection including the number of linear feet televised, number of linear feet visually inspected, condition comments, illicit discharges identified and the results of efforts to eliminate illicit discharges, e.g., discharge line disconnected and redirected to the sanitary sewer or discharge practice terminated.	The inspection process can occur in a single calendar year or may be conducted over a period extending from one year into the succeeding year. Points may be claimed in the year when the televised and/or visual inspection of this portion of the MS4 system (either 2% or 10%) is completed.	3 points may be claimed for inspection of 2% of the MS4 system, alternately if 10% of the MS4 system is inspected 5 points may be claimed.	Summary report including: # feet TV'd, # feet Visually inspected, condition comments, illicit discharges identified, results of efforts to eliminate illicit connections and/or discharges found.
IDDE – 08	Implement a program to increase the reliability of sanitary sewer pump stations above the minimum standard design requirements.	<p>A pump station shall be upgraded to include the following:</p> <ul style="list-style-type: none"> A dedicated on-site standby generator shall be installed (with automatic transfer switch) for use when main line power fails. 	In the year all improvements, as listed under measurable goals, are installed and ready for operation the points may be initially claimed and in subsequent years these improvements remain operational points may be claimed.	5 points may be claimed (for each pump station upgraded in compliance with this BMP) in the first year the improvements, as listed under	Summary of the Pump stations receiving improvements, improvements implemented and dates of completion.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
IDDE-08 (Continued)		<ul style="list-style-type: none"> <li data-bbox="640 313 1047 646">• A dialer system, or telemetry system, or connection to a SCADA system shall be installed to provide real time or nearly real time notification of failures at the pump station which can potentially lead to sanitary sewer overflow. <li data-bbox="640 651 1047 1149">• The permittee shall purchase and maintain for immediate operation a trailer mounted motor driven sewage pump for use when the pump station fails to operate. The motor driven pump shall be sized to pump at a rate at least equal to the firm pumping capacity of any sanitary sewer pump station the permittee claims points for under this BMP. <li data-bbox="640 1154 1047 1464">• The pump station shall be modified to facilitate the connection of the trailer mounted pump discharge to the force main and convenient installation of the suction line from the trailer mounted pump into the wet well. 		<p data-bbox="1480 313 1728 646">measurable goals, are installed and ready for operation,</p> <p data-bbox="1480 651 1728 1084">4 points may be claimed for (for each pump station upgraded in compliance with this BMP) each successive year the improvements, as listed under measurable goals, remain operational.</p>	

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
IDDE-09	Provide a contribution to area recycle programs or programs (such as household hazardous waste disposal facilities, e-cycle facilities, paper shred facilities, pharmaceutical disposal facilities etc.) designed to properly dispose of types of waste or materials which have previously been discarded to or adjacent to either the MS4, streams, or lakes within or adjacent to the permittee's permit area. The area program must be within 30 miles from this permit area.	The contributions may be made to programs which take tires, automotive fluids, batteries, or other wastes for which there is any documentation such wastes have been discarded as addressed under the BMP summary. The contributions must total a minimum of \$500 in the year (\$100 in the year for alternative lower population municipalities) which points are claimed. The contributions can be monetary or can be in the form of goods and/or services with an agreed specified value. Contributions may be made to area household hazardous waste programs, private recycle/reuse facilities or civic/volunteer organizations assisting in recycle.	The total value of donation (either in-kind work, materials, supplies or cash) in a minimum amount of \$500 must be made in the year points are claimed. Alternatively, for municipalities with less than 500 population the total value of donation in a minimum amount of \$100 must be made in the year points are claimed.	2 points may be claimed each year this BMP goal is achieved.	Summary of contributions and monetary value.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
IDDE-10	Inspect, 5% of the MS4 system Stormwater inlets and/or outfalls within the permit area all conducted within a 12-month period to aid in identifying illicit discharges. If in a 12-month period 15% of the MS4 system inlets and/or outfalls are inspected a higher point value may be claimed in the year the required percentage of inspections are completed.	Generate a summary report of the inspection including the number of inlets and/or outfalls visually inspected, condition comments, illicit discharges identified and the results of efforts to eliminate illicit discharges, e.g., discharge line disconnected and redirected to the sanitary sewer or discharge practice terminated.	The inspection process can occur in a single calendar year or may be conducted over a period extending from one year into the succeeding year. Points may be claimed in the year when the televised and/or visual inspection of this portion of the MS4 system (either 2% or 15%) is completed.	3 points may be claimed for inspection of 2% of the MS4 system in the year the required percentage of inlets and/or outfalls are finally inspected, alternately if 15% of the MS4 system is inspected 5 points may be claimed.	Summary of the inspections, condition comments, illicit discharges identified, and summary of efforts to eliminate illicit connections and/or discharges.

4. Construction Site Stormwater Runoff Control

The UG shall continue to maintain 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 pollutant discharge associated with stormwater from construction activity disturbing less than one acre is also 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 includes the following:

- a. Maintain and enforce an ordinance to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State and local law.
- b. Maintain requirements for construction site owners or operators to implement appropriate erosion and sediment control best management practices.
- c. Maintain 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. Maintain procedures for site plan review which incorporate consideration of potential water quality impacts.
- e. Maintain procedures for receipt and consideration of information submitted by the public.
- f. Maintain procedures for site inspection and enforcement of control measures.
- g. The implementation of BMPs for this minimum control measure must result in accumulation of a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The point total requirement increases to 6 points for each calendar year beginning in 2023. The table below lists various BMPs, measurable goals, and the required timing-period or implementation-schedule to qualify for the points in the year.

The UG has added a column (not provided in the permit) that explains how the UG will document compliance with the measurable goal for each BMP.

The UG has chosen to implement BMPs 1, 2, 4, 5, 6, and 7 to accumulate the points required by the permit. The UG will choose from among those BMPs implemented to claim points as needed for compliance with the permit and include only those in the Annual Report.

In the table below, the UG explains for each of the BMPs implemented during calendar year 2021 how it will implement the BMP. The UG will update this SMP in future years to add implementation efforts to comply with the 6 points required.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
CSSRC-01	Implement a requirement for a Soil Erosion and Sediment Control(SESC) plan for any land disturbance sites which are either equal to or greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.	Enact a regulatory ordinance, or other enforceable measure that requires an SESC Plan for all Developments disturbing sites which are either equal to or greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.	Points may be claimed in the year the ordinance/enforceable requirement first becomes effective, and for each full calendar year thereafter for which the ordinance/enforceable requirement remains effective.	3 points may be claimed in the year the ordinance initially becomes effective, and 2 points may be claimed for each successive year thereafter for which the ordinance remains effective.	Copy of the current ordinance with a reference to the year it was originally adopted. Summary of any revisions to the ordinance that are adopted during the year for which that credits are claimed.
CSSRC-02	Develop and adopt a design manual for erosion and sediment control BMPs which are required to be used on sites which will be disturbed and are either equal to or greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.	Require implementation of BMPs in compliance with the design manual on all sites which meet the disturbed area standard as specified.in the BMP Summary.	Points may be claimed for the year which the manual is initially adopted and implemented, and a reduced number of points may be claimed for subsequent years in which the manual remains implemented.	3 points may be claimed in the year the manual is initially implemented, and 2 points may be claimed for each successive year the manual remains effective.	Web link to manual.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
CSSRC-04	Develop a site plan review process which considers potential water quality impacts which may occur during construction as well as post construction impacts.	Review process must have written guidance for the reviewer. Issuance of a building permit or approval to start construction may not be provided until the site plan has successfully passed the review process either based on the initial site plan submittal or has been modified to comply with requirements identified during the review process. Measures must be included to enforce the installation of water quality BMPs included in the site plan.	Points may be claimed in the year the review process is initially developed and implemented. Also, points may be claimed in each subsequent year the review process continues to be implemented.	3 points may be claimed in the year the review process is initially developed and implemented 2 points may be claimed for each successive year the review process continues to be implemented.	Web link to review process.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
CSSRC-05	<p>Establish effective requirements for construction sites to control wastes. Develop through ordinance or other enforceable means requirements for construction site</p> <hr/> <p>Operators or owners to control wastes. At a minimum control shall be imposed to prevent entry into the MS4 for the following wastes:</p> <ul style="list-style-type: none"> • Discarded building materials • Concrete • Truck washout • Chemicals • Litter • Sanitary waste 	Enact ordinance or other effective means to achieve control of wastes at construction sites.	<p>Points may be claimed in the year of enactment.</p> <p>Also, points may be claimed in each subsequent year the method of effective control of construction site waste remains in effect.</p>	<p>3 points may be claimed in the year of enactment,</p> <p>2 points may be claimed for each successive year the method of effective control of construction site waste remains in effect.</p>	Copy of the current ordinance with a reference to the year it was originally adopted. Summary of any revisions to the ordinance that are adopted during the year for which credits are claimed.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
CSSRC-06	Develop written procedures for inspection of construction sites. Develop a Stormwater Construction Site Inspection Guide for use by municipal inspectors.	The procedures document must address the administrative aspects associated with required inspections of construction sites, the issuance of inspection reports, notices of violations, and enforcement actions. The Inspection Guide must provide inspectors guidance on how to conduct a construction site stormwater inspection, the required procedures, and guidance on acceptable conditions of various BMPs employed on such sites, enforcement actions and/or reference of cases for enforcement by other municipal staff, guidance on photo log of the inspection and inspection checklists for use by the inspector.	Development of the written procedures and the Inspection Guide can occur in any year. Initial implementation can allow points to be claimed in that year and continued implementation can allow points to be claimed in subsequent years.	3 points may be claimed in the year of initial development, 2 points may be claimed for each successive year the written procedures and inspection guide continue to be utilized	Copy of current SOP (written inspection procedures) with a reference to the year it was developed. Summary of any revisions that are made during the year for which credits are claimed. Summary of modifications made to guide.
CSSRC-07	Acquire or develop a software tracking system to track inspections and related tasks.	The tracking system must allow for scheduling inspections and follow-up activities such as re-inspections, mailing notices or reports, etc.	A point can be claimed in the initial year the software tracking system is implemented and each year thereafter it is utilized.	and 1 point may be claimed for each successive year the software is utilized.	Description of tracking system.

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

The UG shall continue to maintain 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 or sale, that discharge into the MS4. The program includes all of the following:

- a. Maintain a requirement for BMPs to prevent or minimize adverse water quality impacts.
- b. Maintain strategies which include a combination of structural and/or non-structural BMPs appropriate for the municipality.
- c. Maintain and enforce an ordinance 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 structural BMPs.
- e. The implementation of BMPs for this minimum control measure must result in accumulation of a minimum of 5 points total on an annual basis for each calendar year 2021 and 2022. The point total requirement increases to 7 points for each calendar year beginning in 2023. The table below lists various BMPs, measurable goals, and the required timing-period or implementation-schedule to qualify for the points in the year.

The UG has added a column (not provided in the permit) that explains how the UG will document compliance with the measurable goal for each BMP.

The UG has chosen to implement BMPs 1, 3, 5, and 6 to accumulate the points required by the permit. The UG will choose from among those BMPs implemented to claim points as needed for compliance with the permit and include only those in the Annual Report. In the table below, the UG explains for each of the BMPs implemented during calendar year 2021 how it will implement the BMP. The UG will update this SMP in future years to add implementation efforts to comply with the 7 points required.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PCSM-01	<p>Develop and adopt a custom design manual for Post-Construction Stormwater Management which specifies various structural BMPs which are required for new development and re-development construction sites which are greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more. Alternately, adopt and implement the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual</p>	<p>The custom design manual shall impose requirements to achieve at least one of the following standards:</p> <ul style="list-style-type: none"> • Capture, at least, the first 0.5 inches of precipitation on the development/re-development site and utilize methods to prevent discharge off-site, including but not limited to: <ul style="list-style-type: none"> • retain on-site • infiltrate • evaporate • transpire or • beneficially reuse • Through implementation of appropriate BMP(s) reduce the peak stormwater flow rate to a value equal to or less than the rate which would be experienced on the site prior to the development/re-development project based upon modeling a standard storm event, e.g. 1.0 inch – 6-hour event assuming saturated soil conditions. 	<p>Development of the design manual can occur in any year. Initial implementation can allow points to be claimed in that year and continued implementation can allow points to be claimed in subsequent years.</p>	<p>4 points may be claimed in the year of initial implementation of a custom design manual –</p> <p>Alternately 6 points may be claimed in the year of initial implementation of the APWA 5600 stormwater design criteria and the MARC/APWA BMP Manual,</p> <p>3 points may be claimed for each successive year compliance with the custom design manual is required/implemented</p>	<p>Web link to Design Manual.</p>

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PCSM-01 (continued)		<ul style="list-style-type: none"> • Other sizing or detention standards generally accepted by design engineers as adequate for the permittee's local. • As an alternative to a custom design manual the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual may be adopted and implemented. <p>Measures must be included to enforce the installation of the various structural BMPs required.</p>		Alternately 5 points may be claimed in each successive year the implementation of the APWA 5600 stormwater design criteria and the MARC/APWA BMP Manual is required/implemented.	

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PCSM-03	<p>Develop and implement a program to provide adequate long-term cleaning, operation, and maintenance of all municipally owned or operated post-construction structural stormwater BMP facilities. The program shall address several different types of these BMP systems. The systems, which are addressed, shall include any type of post-construction structural BMP system, contained in the MS4. These shall include, if so present, at a minimum the following:</p> <ul style="list-style-type: none"> • Detention ponds • Retention ponds • Grass swales • Pervious paving systems • Wetlands • Vegetative filter strips • Manufactured stormwater treatment devices (swirl separators, screens, etc.) • Drop inlet-catch basin 	<p>The program shall be detailed in a written document and made available to all pertinent maintenance staff.</p>	<p>Development of the program can occur in any year. Initial implementation can allow points to be claimed in that year and continued implementation can allow points to be claimed in subsequent years.</p>	<p>3 points may be claimed in the year of initial implementation,</p> <p>2 points may be claimed for each successive year the program is maintained and utilized.</p>	<p>Copy of the document.</p>

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PCSM-05	Develop and implement a program for inspection of permittee owned structural BMPs which includes implementation of needed maintenance to ensure long-term operation of the BMPs	<p>The program shall require inspection of at least 10% of the structural BMPs on an annual basis.</p> <p>Identified maintenance activities shall be completed:</p> <ol style="list-style-type: none"> 1. in the same year of inspection or 2. completed as dictated by the permittee's maintenance/O&M plan 3. or a written plan for completion of the necessary maintenance shall be completed in the same year of inspection with the objective for completion of the maintenance activity within 18 months. 	The program shall be developed and implemented within a single year.	<p>3 points may be claimed in the year the program is initially developed and implemented,</p> <p>2 points may be claimed for each successive year the program continues to be implemented.</p>	Summary including: Known STF Locations, types, and last inspection date and, if applicable, date set for scheduled maintenance activities to be completed.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PCSM-06	Develop and implement a program for inspection of known privately owned structural BMPs which includes providing the owner of the BMPs an inspection report which specifies needed maintenance to ensure long-term operation of the BMPs.	The program shall require inspection of at least 10% of the known privately owned structural BMPs on an annual basis. Identified maintenance activities shall be completed in the same year of inspection or a written plan for completion of the necessary maintenance shall be completed in the same year of inspection with the objective for completion of the maintenance activity within 18 months.	The program shall be developed and implemented within a single year.	3 points may be claimed in the year the program is initially developed and implemented, 2 points may be claimed for each successive year the program continues to be implemented.	Summary including: Known STF Locations, types, last inspection date and, if applicable, date set for scheduled maintenance activities to be completed.

6. Pollution Prevention/Good Housekeeping for Municipal Facilities

The UG shall continue to 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.

- a. The implementation of BMPs for this minimum control measure must result in accumulation of a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The point total requirement increases to 6 points for each calendar year beginning in 2023. The table below lists various BMPs, measurable goals, and the required timing-period or implementation-schedule to qualify for the points in the year.

The UG has added a column (not provided in the permit) that explains how the UG will document compliance with the measurable goal for each BMP.

The UG has chosen to implement BMPs 3, 4, 5, 6, 7, and 11 to accumulate the points required by the permit. The UG will choose from among those BMPs implemented to claim points as needed for compliance with the permit and include only those in the Annual Report. In the table below, the UG explains for each of the BMPs implemented during calendar year 2021 how it will implement the BMP. The UG will update this SMP in future years to add implementation efforts to comply with the 6 points required.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PP/GH-03	Develop a guidance document for municipal staff or third-party contractors which apply pesticides. The guidance shall require any municipal staff, who apply restricted use pesticides, to have a commercial applicator certification from the Kansas Department of Agriculture if required by that Department.	Require staff which apply pesticides to use such pesticides in compliance with the guidance document. The guidance document must require use of pesticides in compliance with the label instructions.	The guidance document must be finalized and implemented in the year which points are initially claimed.	2 points may be claimed in the year the guidance document is finalized and implemented, 1 point may be claimed for each successive year the guidance document continues to be implemented.	Copy of current SOP (pesticide guidance) with a reference to the year it was developed. Summary of any revisions that are made during the year for which credits are claimed.
PP/GH-04	Implement a program, with guidance to municipal staff or third-party contractors, to ensure any municipal vehicle or other mechanical equipment washing is conducted in a manner which ensures the wash water is disposed of in the sanitary sewer or otherwise receives proper treatment prior to discharge to the environment.	Maintain proper wash facilities for municipal staff to wash vehicles and/or equipment or implement a program which includes guidance to municipal staff to take vehicles and/or equipment to commercial wash facilities, either of which ensures the wash water is conveyed to the sanitary sewer, or otherwise receives proper treatment prior to discharge to the environment, and not discharged untreated to the MS4 or directly to the environment.	The guidance document must be finalized and implemented in the year which points are initially claimed.	2 points may be claimed in the year the guidance document is finalized and implemented, 1 point may be claimed for each successive year the guidance document continues to be implemented.	Copy of current SOP (vehicle and equipment washing) with a reference to the year it was developed. Summary of any revisions that are made during the year for which credits are claimed.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PP/GH-05	Implement a program for street sweeping in which the street sweepings are collected and disposed of properly or recycled/reused if possible.	All paved streets which can be swept shall be listed in the schedule for street sweeping. A log shall be maintained listing the street segments which are swept and, dates of sweeping and where the street sweepings are disposed or where the material was sent to be recycled and/or reused. Alternatively, for municipalities with less than 500 population street sweeping can be limited to sweeping the gutters. The log which must be maintained need only indicate the street segments which were swept in the year and confirm the sweepings were properly disposed or recycled and/or reused	At least 10% of the streets which are listed in the street sweeping schedule must be swept at least once in a year to claim points for the year. In years when street sweeping equipment is purchased for use by the permittee additional points may be claimed. Alternately, for municipalities with less than 500 population at least 5% of the street gutters which can be swept must be swept in a year to claim points for the year.	3 points may be claimed in the year at least 10% of the listed streets are swept and street sweeping equipment is purchased, 2 points may be claimed for each year at least 10% of the listed streets are swept or alternately for municipalities with less than 500 population if at least 5% of the street gutters which can be swept are swept in a year 2 points may be claimed.	Summary of street sweeping activities, including list of street segments swept, dates of sweeping, and location where sweepings are disposed of, or recycled/reused.
PP/GH-06	Develop an employee training program to ensure permittee's staff understand what actions they can take in the workplace to minimize stormwater pollution.	Provide guidance documents in the form of either fact sheets, flyers, or e-mails to staff to coach them in appropriate actions they can take while working to minimize stormwater pollution.	For each year in which staff receive guidance documents or in-person training or video training on two separate dates, points may be claimed for the year.	In years when guidance documents or training (in-person or video) are provided on two separate dates, 1	Copy of educational materials and/or sign in sheet (for live or video training).

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PP/GH-06 (Cont.)		<p>Alternately, provide in-person training or videos with sign-in-sheets for signature documentation of personal or video training.</p> <p>Retain copies of the guidance documents and/or sign-in-sheets. A log of when the guidance was distributed, or training was provided to staff should be maintained.</p> <p>Provide appropriate guidance and/or training to staff a minimum of twice per year.</p>		point may be claimed.	
PP/GH-07	Implement a program to inspect stormwater inlets to identify illicit discharges and clean drop inlets of accumulated debris.	<p>Inspect at least 5% of all inlets annually.</p> <p>Additionally, if 10% of all inlets are inspected in a year an additional point may be claimed.</p> <p>For any inlets which have evidence of dumped paint, oil or other substances which are considered illicit discharges follow up with efforts to educate individuals near the impacted inlet about illicit discharges.</p> <p>For inlets which have any accumulation of debris, remove the debris for proper disposal.</p>	For each year in which staff inspect at least 5% of all stormwater inlets at least one point may be claimed.	<p>In years when staff inspect at least 5% of all stormwater inlets and remove accumulated debris 1 point may be claimed.</p> <p>In years when staff inspect at least 10% of all stormwater inlets and remove accumulated debris 2 points may be claimed.</p>	Summary of inlet inspections and cleaning.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
PP/GH-08	Develop, implement, and keep updated an online storm sewer map accessible to the public.	Map shall cover the entire MS4 within the permit area and include all the MS4 lines both pipe and open drainage (i.e. ditches) and shall also illustrate all impaired waterways (i.e. 303(d) listed and TMDL listed streams/rivers) with an indication of the listed impairment.	For each year in which the map is posted online points may be claimed. In the first year the map is posted it must be posted for at least six months for points to be claimed.	3 points may be claimed in the first year 2 points may be claimed for each year thereafter for which the map remains posted.	Copy of map or web link to map.
PP/GH-11	Install a canopy or other covered area for load-out of salt or other de-icing chemicals where such de-icing materials are stored either within the permit area or a storage facility located within 30 miles of this permit area.	The canopy or covered area shall be large enough to allow normal load-out and cleanup of spilled de-icing materials, without mixing with precipitation and resulting in contaminated runoff from the site, during and immediately following load out operations	Points may be claimed in the initial year of construction and in subsequent years the canopy/covered area remains in operation.	3 points may be claimed for the year in which the canopy/covered area is constructed	Summary of construction activities anytime a new canopy/covered area is constructed.
	The canopy or other covered area for load-out of salt or other de-icing materials may be installed at a facility owned by the permittee or at a facility owned by an entity the permittee contracts with as long as the facility is located within 30 miles of this permit area.			2 points may be claimed for each subsequent year the canopy/covered area remains in operation.	

7. Total Maximum Daily Load (TMDL) Regulated Pollutants

The UG shall continue to review, update, implement and develop, when necessary, structural, and non-structural BMPs which will reduce to the Maximum Extent Practicable the discharge of the TMDL regulated pollutants from the MS4 as listed in PART II of the permit.

The effort to reduce the discharge of TMDL regulated pollutants is anticipated to be an iterative process with changes in the SMP periodically, generally not more frequently than annually, possibly every two or three years. This “adaptive management” type process is recommended to attenuate the discharge of TMDL regulated pollutants listed in the TMDL Table of PART II of the permit. The permit requires that this SMP shall provide:

- a. BMPs which will be implemented, including non-structural and/or structural measures, as selected from EPA’s “National Menu of Best Management Practices (BMPs) for Stormwater” or from a local or regionally appropriate storm drainage criteria manual such as the Kansas City Metro Chapter of the American Public Works Association (APWA) Manual of Best Management Practices for Stormwater Quality or such other BMP manuals as are appropriate (links for the National Menu of Best Management Practices (BMPs) for Stormwater and the Kansas City Metro Chapter of the American Public Works Association (APWA) Manual of Best Management Practices for Stormwater Quality can be found on the KDHE document titled “MS4 NPDES Permit Helpful Guidance and/or Resources” at the following url:

http://www.kdheks.gov/muni/download/MS4_NPDES_Permit_helpful_guidance.pdf

- b. Include a description of non-structural practices being implemented, including the six minimum control measures and/or other source control measures.
- c. Include the location of the structural BMPs.
- d. Identify the design factors associated with the structural BMPs.
- e. Include information on the reported effectiveness of the chosen BMPs based on regionally appropriate data or performance analyses in the International Stormwater BMP Database (a link to the Database can be found on the KDHE document titled “MS4 NPDES Permit Helpful Guidance and/or Resources” at the following url:

http://www.kdheks.gov/muni/download/MS4_NPDES_Permit_helpful_guidance.pdf

- f. Include a schedule for constructing and/or implementing additional selected BMPs to reduce the discharge of TMDL regulated pollutants.
- g. Include an inspection/maintenance plan and schedule for each BMP, as appropriate.

- h. Include a plan and schedule to monitor the effectiveness of the BMPs to reduce the discharge of TMDL regulated pollutants

Measurable goals to assess the effectiveness of the TMDL BMPs

Measurable goals may be based on stormwater sampling within the MS4 comparing results upstream of the structural BMP and downstream of the BMP. The monitoring results of samples obtained to determine performance of BMPs should be maintained on file in compliance with the Standard Conditions records retention requirement, these results do not need to be reported to KDHE via the electronic DMR process at this time. However, these monitoring results are to be reported or summarized in the Annual Report as required in PART V REPORTING.

Alternately, measurable goals for TMDL BMPs may be based on a parameter which indirectly relates to the reduction of a TMDL pollutant in stormwater. Examples include the number of brochures or educational fliers distributed to the public, implementation and start of enforcement of an ordinance such as a stream buffer ordinance, the number of times litter collection efforts occur in a year, installation of a specified size of BMP such as a wetland or rain garden with a design area in compliance with the stated value. The permittee may use modeling that has been properly calibrated to determine that BMP measurable goals are being met.

Measurable goals for reducing TMDL pollutants contributed by MS4s can be expressed in quantifiable values and can include, without limitation, the number of BMPs in an area such as but not limited to, a sub-basin; the number of acres controlled by BMPs; the number of rain gardens; performance measures in a development/redevelopment ordinance; or other quantifiable activities or BMP implementations.

In some cases, certain BMPs may be amenable for measurable goals that could include:

- a. reducing the total mass of pollutants, and/or
- b. be expressed as average and median values (percent reduction of inflow volume, reduction in pollutant mass loading) or for bacteria as a geometric mean.

Maps shall be developed and maintained which illustrate:

- a. The Permit Area, boundaries of the contributing drainage basins and primary sub-basins, within and outside the Permit Area
- b. The locations of the BMPs, if structural
- c. The location of TMDL stream monitoring locations, if such monitoring is required
- d. Storm sewer collection system which includes the outfalls within the permit Area where the MS4 drains to TMDL listed impaired streams or lakes.

Alternative Stormwater Offsite Pollution Reduction Program

As appropriate, when waters of the state are affected by TMDL regulated pollutants from both the Permit Area and surrounding non-jurisdictional lands, the permittees may incorporate and implement plans through their SMP for an offsite pollution reduction program to install Best Management Practices (BMPs) in alternative locations, including outside the Permit Area, within the watershed shared by urban entities or urban and non-urban entities. Any alternative stormwater offsite pollution reduction program should be developed with watershed interests, such as other communities, Watershed Restoration and Protection Strategy (WRAPS) groups and Conservation Districts lying outside the Permit Area for the joint purpose of reducing pollutant loads generated from urban and non-urban lands within the shared watershed. Candidate offsite locations and practices will be consistent with implementing existing watershed plans that identify specific urban and non-urban (such as agricultural) BMP types and locations to achieve TMDLs reductions. The Alternative Stormwater Offsite Pollution Reduction Program shall be subject to KDHE approval and approved by KDHE prior to incorporation into the permittee’s SMP.

PART II. TOTAL MAXIMUM DAILY LOAD (TMDL) BEST MANAGEMENT PRACTICES AND SURFACE WATER MONITORING

The UG shall report the results of the storm event monitoring for streams listed in Surface Water Monitoring Locations table below with the eDMR reporting system.

A. TMDL BMP Implementation Requirements

The implementation of BMPs for this minimum control measure must result in accumulation of a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The point total requirement increases to 6 points for each calendar year beginning in 2023. The following table lists various BMPs, measurable goals, and the required timing-period or implementation-schedule to qualify for the points in the year.

In addition to implementing a TMDL Pollutant Reduction and Monitoring program as required above, the permittee must implement sufficient listed BMPs in the table below to qualify for the required number of points.

The UG has chosen to implement BMPs 1, 5, 6, and 7 to accumulate the points required by the permit. The UG will choose from among those BMPs implemented to claim points as needed for compliance with the permit and include only those in the Annual Report. In the table below, the UG explains for each of the BMPs implemented during calendar year 2021 how it will implement the BMP. The UG will update this SMP in future years to add implementation efforts to comply with the 6 points required.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
TMDL-01	Install pet waste stations which include a glove/bag dispenser with signage and waste can to encourage pet waste disposal at either parks, trails, rest areas or other public lands owned by the permittee.	At least one pet waste station shall be installed at the selected park, trail, rest area or other public land. The station(s) shall include signage which encourages proper pet waste disposal/cleanup and a waste can.	In the year, the Measurable Goal requirement is implemented the point may be claimed and for each year thereafter the pet waste stations remain in use.	<p>1 point may be claimed for the year in which the Measurable Goal requirements are enacted, and</p> <p>1 point may be claimed for each subsequent year the Measurable Goal requirements remain in effect.</p>	List of installations, and map of parks with pet waste stations. Approximate quantity of waste bags provided in year.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
TMDL-05	<p>Develop a pet waste brochure or flyer document to educate the public about animal waste contamination of stormwater. The document encourages pet owners to pick up their pet's waste.</p>	<p>The brochures or flyers are to be posted in various public buildings and distributed to the public throughout the year. In the year the number of documents shall equal or exceed the most recent U.S. Census Bureau decennial housing units value for the permit area. The applicable U.S. Census housing units value shall be documented, and the number of documents distributed shall also be documented. This information and copies of the documents shall be retained on file.</p>	<p>The documents may be distributed in any fashion and at any time throughout the year.</p> <p>Documents posted on website(s) shall be posted for at least six months in the year. Documents posted on social media shall be posted six times within the year points are claimed.</p>	<p>1 point may be claimed in a year in which the required number of brochures and/or flyers are distributed, documents posted on social media or the website must be posted for at least as specified.</p>	<p>Copy of brochure, summary of media and dates posted, and print out of website page, if applicable.</p>
	<p>Alternately, post the document on social media or the municipal website.</p>	<p>Documents posted to social media or the website shall have the page copied and printed to retain on file.</p>			

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
TMDL-06	Distribute "Only Rain Down the Drain" door hangers or similar document.	Provide in portions of the permit area with suspected illicit discharges. In the year the number of documents distributed shall equal or exceed 10% of the most recent U.S. Census Bureau decennial housing units value for the permit area. The applicable U.S. Census housing units value shall be documented, and the number of documents distributed shall also be documented. This information and copies of the documents shall be retained on file.	<p>The documents may be distributed in any fashion and at any time throughout the year.</p> <p>Alternately, the document may be posted to social media (at least three times in the year) or posted on the municipal website for a minimum of three months in the year to qualify for points.</p>	2 points may be claimed in a year in which the required number of hangers or similar documents are distributed or alternately posted to social media or the municipal website for the required time.	Copy of hanger or similar document, summary of distribution, including posting to social media with dates posted, print out of website page, if applicable

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
TMDL-07	Inspect 10% of all known MS4 outfalls for dry weather discharges either annually or twice per year to identify potential illicit discharges.	Complete inspection of all known MS4 outfalls either annually or twice per year during dry weather periods. If dry weather discharge is found follow-up with investigation to determine if a portion or all the discharge is illicit. Document the findings and initiate efforts to eliminate any identified illicit discharges.	The inspections must be conducted either annually or if twice per year they must be seasonal within the same calendar year (winter, spring, summer, and fall). Points can be claimed for that year. In addition, if an illicit discharge is detected and eliminated in association with this inspection program additional points may be claimed in the year detected or in the year the discharge is eliminated.	<p>3 points may be claimed for annual inspection as required by this BMP,</p> <p>5 points may be claimed for these inspections completed twice in a year, and if an illicit discharge is detected and eliminated.</p> <p>The 2 additional points may be claimed, only once, either in the year detected or in the year the illicit discharge is eliminated.</p>	Summary of inspections including; outfalls inspected, dry weather discharges found, results of field testing, suspected illicit discharges found, result of investigation of discharge.

8. TMDL Surface Water Monitoring

The permittee shall implement Best Management Practices (BMPs) to reduce to the Maximum Extent Practicable the discharge of the TMDL regulated pollutants from the MS4 to the watershed of the impaired stream(s) as listed below:

TMDL TABLE

Total Maximum Daily Loads, TMDLs, are established for waters found on the CWA Section 303d list of impaired waters. The purpose of the TMDL is to define the necessary and allowable pollutant load that may enter those impaired waters during an established critical condition, so those waters attain a condition that fully supports all their designated uses during that critical condition. The TMDL then allocates portions of that allowable load among the likely point and non-point sources discharging the pollutant into the water or its watershed. Implementation of the TMDL by the NPDES and 319 programs brings about reductions in current loading from those sources through numeric goals or narrative actions to the allowable level allocated to each source. The UG shall implement Best Management Practices (BMPs) to reduce to the Maximum Extent Practicable the discharge of the TMDL regulated pollutants from the MS4 to the watershed of the impaired stream(s) as listed below. The table was modified from the original Permit format to be specific and avoid confusion for UG staff.

TMDL Table			
Impaired Surface Water	TMDL Regulated Pollutant	Parameter to be Monitored	Min. Reportable Limit
Kansas River	Bacteria	E. Coli	10(Col/100ml or MPN)

Wet weather surface water quality monitoring does not need to be conducted on the Kansas River, it is only required on Little Turkey Creek, Brenner Heights Creek, and Barber Creek under this permit. The required surface water monitoring locations* and their EDMR codes are identified as follows. The table was modified from the original Permit format to be specific and avoid confusion for UG staff.

Surface Water Monitoring Locations		
LOCAL SITE NAME	LOCAL ID.	KDHE EDMR CODE
Little Turkey Creek	LTC-1	LTCR001B6
Brenner Heights	BHC-1	BHCR002B6
Barber Creek	BARC-1	BARCR003B6

A. Monitoring Requirements

1. Storm Event Monitoring: The UG shall continue its wet weather monitoring program with the intent to assess the impact of precipitation related discharges to the streams listed above for potential impact on the Kansas River. Sampling and analysis include instream monitoring of the streams through grab samples at specified storm events. The UG shall implement this monitoring program to support adaptive stormwater management and the evaluation of SMP effectiveness in reducing the discharge of pollutants from the MS4. Monitoring for E. Coli shall be conducted as required for each storm event sampled which meets the criteria specified in this section.

The storm event monitoring data for TMDLs may be used to assist in evaluating trends in water quality. This monitoring is not intended to demonstrate compliance with the requirements of this MS4 NPDES permit.

B. Monitoring Frequency and Periods Criteria

1. Four storm events per year per monitoring site shall be monitored. Storm event shall mean a 24-hr rain or snow melt event of greater than or equal to 0.25 inches.
2. Monitoring shall normally be conducted in the spring (between March 1 and June 30) and summer (between July 1 and October 31) for the parameters as appropriate based upon the impairment. It is recommended two events be monitored in the spring and two events be monitored in the summer. However, it is most important four events be monitored in each calendar year and storm event monitoring can occur in any month.

C. Parameters

TMDL Impairment	Parameter to be Monitored *	MRL **	Sample Type
Nutrients	Total Phosphorus as P (mg/1)	0.05 (mg/1)	Grab or Composite
Nutrients	Nitrate+Nitrite as N (mg/1)	0.10 (mg/1)	Grab or Composite
Nutrients	Total Kjeldahl Nitrogen(mg/l)	1 (mg/l)	Grab or Composite
Nutrients	Total Nitrogen (mg/1)		Calculate ***
Sediment	Total Suspended Solids(mg/1)	10 (mg/1)	Grab or Composite
Sediment	Turbidity (NTU)		Grab or Composite
Bacteria	E. coli (Col/100 ml or MPN)	10 (Col/100 ml or MPN)	Grab

* For a listed TMDL Regulated Pollutant in the TMDL Table, multiple parameters may be required to be monitored. In the case of Bacteria only one parameter needs to be monitored (E. coli). However, in the case of Sediment two parameters need to be monitored (Total Suspended Solids and Turbidity). In the case of Nutrients three parameters need to be monitored (Total Phosphorus, Nitrate+Nitrite as N, and, Total Kjeldahl Nitrogen). Additionally, one value needs to be calculated Total Nitrogen which equals the sum of Nitrate+Nitrite as N and Total Kjeldahl Nitrogen (the eDMR reporting process will calculate this value for the individual reporting the data).

Monitoring in impaired streams to test for TMDL pollutants, as listed in the TMDL Table does not necessarily require monitoring for all of the parameters listed in the Parameters table. For a stream, or its tributary, where monitoring is conducted, only the parameters associated with the listed TMDL Regulated Pollutant need to be monitored.

** Minimum Reportable Limit

*** Total Nitrogen = Total Kjeldahl Nitrogen + Nitrate+Nitrite.

In addition, at the time of sampling, report the following:

- | | | |
|----|---|------------------|
| 1. | Rainfall (last 24 hours) - inches | Gauge Reading |
| 2. | Stream Flow – CFS | Estimate/Reading |
| 3. | Stream Depth from a standard – Feet | Estimate/Reading |
| 4. | Stream Level (rising, falling, steady) | Describe |
| 5. | Stream Velocity (rapid, normal, still [backwater]) | Describe |

For storm events, grab samples for instream monitoring are to be obtained within 4 hours of rising stages on streams. Monitoring of a storm event for the purpose of complying with the stormwater monitoring and reporting requirements of this permit is not allowed if there is not at least 24 hours between this sampling storm event and the end of the previous rainfall event. If composite sampling is conducted, samples are normally collected over the course of the hydrograph and flow-weighted to provide a representative composite sample for the storm event.

D. Adaptive Management

The monitoring program may be adapted to improve the effectiveness of the SMP or if supported by additional information. It may also be supplemented or supplanted with modeling approaches to meet monitoring plan objectives. Any modifications to the monitoring program are subject to KDHE approval.

E. Documentation of Stream Monitoring Locations

The permittee, within 100 days following the effective date of this permit, shall provide KDHE maps illustrating the wet weather surface water monitoring locations and a table listing information associated with each monitoring location in a similar fashion as required by the annual reports. In some cases, KDHE has approved a rotational monitoring program where some monitoring locations are only monitored in certain years, if this is the case the table must list the years monitoring is required or alternately indicate all years.

EPA has promulgated a final rule requiring regulated entities to report DMR data electronically. Also, KAR 28-16-63 requires permittees to report NPDES data in a form required by KDHE. KDHE has developed electronic reporting tools to assist permittees in complying with the EPA electronic reporting rule and KAR 28-61-63. Unless a waiver has been approved by KDHE, permittees are required to submit reports electronically via the eDMR process.

The storm event monitoring data for TMDLs, as required in this PART II, is required to be reported to KDHE via the electronic DMR (eDMR) process. Additional monitoring of streams flowing within or near the Permit Area, monitoring industrial stormwater discharges (PART III), monitoring of discharges from MS4 outfalls, or discharges from areas with BMPs may be done at the permittee's discretion to assist in management and evaluation of the BMPs (process control/monitoring) and for compliance with the SMP and/or this permit. This additional monitoring is not required to be reported via the eDMR process.

F. Implementation

The UG has created BMPs listed below based on the Wet Weather Monitoring Program the UG continues to implement. The UG will continue to implement the program as outlined in the BMPs listed below and in accordance with the Permit requirements listed above.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
TMDLSWM-1	Monitor the water quality of the Kansas River via sampling of tributaries (Little Turkey Creek, Brenner Heights Creek and Barber Creek) for TMDL regulated pollutants (Bacteria).	Grab samples shall be obtained in-stream during storm events at the at the prescribed locations. Storm events shall be considered valid if the precipitation is equal to or greater than 0.25-inches. Monitoring shall occur in the spring (March 1 to June 30) and summer (July 1 to October 31). In the event weather patterns do not cooperate, samples may be obtained in the summer. A minimum of 4 events must be sampled in the given year. Grab samples shall be obtained within 4 hours of rising stages on streams. Sampling activities are not allowed if the precipitation has occurred 24-hours prior to the targeted storm event.	In addition to samples the following shall be recorded at the time of sampling: <ol style="list-style-type: none"> 1. Rainfall (last 24 hours) - inches 2. Stream Flow (cfs) 3. Stream depth (feet) 4. Stream level (rising, falling, steady) 5. Stream velocity (rapid, normal, still [backwater]) 	N/A	Summary of samples obtained including; dates, rainfall, stream flow, stream depth, and stream velocity.
TMDLSWM-2	Perform analysis of samples obtained from sampling activities	Lab analysis results will be recorded and a statistical analysis with previous year's sampling activities will be provided for comparison.	A summary of the statistical analysis and interpretation will be provided to KDHE	N/A	Summary of analysis and interpretation of results.

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	Documentation
TMDLSWM-3	Develop and maintain maps that illustrate the permit area, drainage basins, subbasins, locations of BMPs, TMDL stream monitoring locations, storm sewer collection system, and known outfalls in the permit area, draining to MS4 TMDL impaired waters.	Prepare and maintain maps as follows: <ol style="list-style-type: none"> 1. The Permit Area, boundaries of the contributing drainage basins and primary sub-basins, within and outside the Permit Area 2. The locations of structural BMPs 3. The location of TMDL stream monitoring locations 4. Storm sewer collection system which includes the known outfalls within the Permit Area where the MS4 drains to TMDL listed impaired streams or lakes 	Annually prepare and submit with the Annual Report.	N/A	Maps as described in Measurable Goals.

9. Monitoring Industrial Stormwater Discharges

The UG will continue a program for monitoring industrial stormwater discharges to the MS4 system in order to control pollutants from industrial facilities. This program for monitoring and controlling such run-off shall include the following:

- A. Develop and maintain a list of industrial facilities that the permittee determines may contribute a substantial pollutant loading to the municipal storm sewer system. This list shall include municipal landfills; hazardous waste treatment, disposal, or recovery facilities; and facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA).
- B. Annually at least two facilities on the list shall be identified as high priority facilities and an inspection shall be conducted with sampling of stormwater runoff, for the following parameters:
 1. Oil and grease – mg/l
 2. Chemical oxygen demand – mg/l
 3. pH – Standard Units
 4. Biochemical oxygen demand (5 day) – mg/l
 5. Total suspended solids – mg/l
 6. Total phosphorus – mg/l
 7. Total Kjeldahl nitrogen (TKN) – mg/l reported as N
 8. Nitrate plus nitrite (NO_3+NO_2) – mg/l reported as N
 9. Total nitrogen – mg/l calculated as $\text{TKN} + (\text{NO}_3+\text{NO}_2)$ reported as N
 10. Any other Pollutant limited in applicable effluent guidelines subcategories
 11. Any other pollutant listed in an existing NPDES permit for the industrial facility – reported in the format specified in the permit

A minimum of a single grab sample should be obtained within the first 30 minutes of stormwater runoff although samples may be obtained within up to 60 minutes following the start of stormwater runoff. The storm event should result in a 0.25 inch or more rainfall.

The permit effective February 1, 2020 does not include optional BMPs with associated points values to implement this permit requirement. Therefore, the UG has developed a set of BMPs (below) that will be implemented each year in conformance with the requirements stated above.

MONITORING INDUSTRIAL STORMWATER DISCHARGES**Stormwater Management Plan**

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	AR Documentation
ISD-01	Maintain a set of Standard Operating Procedures for identifying facilities to include in Industrial Stormwater Registry, inspections, and enforcement	Annually review and when deemed necessary, revise SOPs	Annually	N/A	Copy of revised SOPs in the year they are revised.
ISD-02	Maintain a Registry of Industrial Facilities as defined by 40 C.F.R. 122.26(d)(2)(iv)(C)	The UG shall maintain a list of industrial facilities consistent with 40 C.F.R. 122.26(d)(2)(iv)(C) that the UG determines may contribute a substantial pollutant loading to the MS4. The list shall include municipal landfills, hazardous waste treatment, disposal, and recovery facilities (TSDs) and industries subject to reporting requirements pursuant to SARA Title III Section 313. The list shall be updated on an annual basis.	Annually	N/A	Copy of updated registry.
ISD-03	Maintain an inspection program of industrial facilities on the Industrial Stormwater Registry	Annual the UG shall identify and inspect at least two (2) facilities. Inspections shall consist of a review of the facility SWPPP, compliance with the SWPPP, a site inspection with the facility manager/environmental compliance officer. A summary of the inspection results will be prepared.	Annually	N/A	Summary of inspection results and summary of sample analysis results

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	AR Documentation
ISD-03 (Cont.)		<p>In addition to the facility site inspection, the UG will obtain samples of stormwater at facility outfalls identified in the SWPPP where potential pollutants are expected to discharge. A grab sample shall be obtained within the first half hour of stormwater runoff. The grab sample is invalid if the storm event precipitation total does not meet or exceed 0.25 inches. Parameters for analysis include:</p> <ol style="list-style-type: none"> 1. Oil and grease (mg/l) 2. Chemical oxygen demand, COD (mg/l) 3. pH - standard units 4. Biochemical oxygen demand -5-day (BOD5) (mg/l) 5. Total suspended solids (TSS) (mg/l) 6. Total Phosphorus (mg/l) 7. Total Kjeldahl Nitrogen (TKN) (mg/l) 8. Nitrate + Nitrite (NO3 +NO2) (mg/l) 	Annually	N/A	

BMP #	BMP Summary	Measurable Goal	Implementation Time Schedule etc.	Points	AR Documentation
ISD-03 (Cont.)		9. Total Nitrogen (mg/l) 10. Any other pollutant limited in applicable effluent guidelines subcategories. (i.e.. Pollutants listed in RCRA, Toxic Release Inventory (TRI), etc.) 11. Any other pollutant listed in an existing NPDES permit for the industrial facility as reported in the format specified in the NPDES permit.			