

**KANSAS STORMWATER 2023 ANNUAL REPORT FORM FOR MUNICIPAL SEPARATE  
STORM SEWER SYSTEMS (MS4)**

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

<input type="checkbox"/>	Permittee [Agency Name] Mailing Address 1:	Unified Government of Wyandotte County/ Kansas City, Kansas
<input type="checkbox"/>	Mailing Address 2:	701 N. 7 <sup>th</sup> St.
<input type="checkbox"/>	Municipality:	Kansas City
	State:	Kansas
<input type="checkbox"/>	Zip Code:	66101
<input type="checkbox"/>	MS4 Program Contact Person:	Jonathan Wiles
<input type="checkbox"/>	Contact E-Mail Address:	jwiles@wycokck.org
<input type="checkbox"/>	Contact Phone Number:	913-573-5700
<input type="checkbox"/>	MS4 Construction Contact - Person	Shawna Trarbach
<input type="checkbox"/>	Construction E-Mail Address:	strarbach@wycokck.org
<input type="checkbox"/>	Contact Phone Number:	913-573-5700
<input type="checkbox"/>	Kansas Permit Number: — Ex. M-MC21-SU01	M-MO25-SO01

Reporting period covers activities from January 1, 2023 through December 31, 2023.

This annual report must be submitted to the Kansas Department of Health and Environment (KDHE) by February 28th, 2024. The annual report is to be submitted as PDF files to KDHE preferably by email ([KDHE.MS4@ks.gov](mailto:KDHE.MS4@ks.gov)). There is no requirement to provide hard copies of any documents.



## EXECUTIVE SUMMARY

### **Introduction: Stormwater Management Plan (SMP).**

The Unified Government of Wyandotte County/Kansas City, Kansas (UG) created a new SMP in 2020 in compliance with the 2020 Municipal Separated Stormwater Sewer System (MS4) Permit. The UG is continuing to implement the new SMP and no revisions were made in 2023.

### **TMDL and Wet Weather Monitoring**

In accordance with the 2020 permit, the UG monitors wet weather at three locations. These locations include Little Turkey Creek (LTC-01), Brenner Heights Creek (BHC-01) and Barber Creek (BARC-01). Generally, the results of the sampling events were consistent with results of previous years. There were fewer sample results above 12,000 CFU/100mL in 2023 (5) compared to 2022 (9). Trends remain on the uptick. The uptick in results is concerning and the UG is taking steps to improve responses when sample results exceed 12,000 CFU/100mL and preparing additional investigation procedures to increase the chances of identifying possible sources of bacteria in the creeks. When sample results exceed 12,000, the UG Water Pollution Control (WPC) staff reviews Sanitary Sewer Reports (SSR) and Combined Sewer Reports (CSR), and work orders to determine if WPC sewer leaks are the cause. Despite having fully followed existing protocols, reviews of reports and investigations in 2023, we were unable to identify sources for the elevated results. The UG is preparing an IDDE Program Guide in 2024 that will assist the UG by consolidating SOPs and IDDE related practices into a single comprehensive guide. This guide will include addressing wet weather sample results that exceed 12,000 CFU/100mL. Additional tools and data that will assist the UG in identifying possible illicit discharge sources are as follows:

In 2023 the UG engaged a consultant firm to perform stream walks to identify and rate sanitary sewer stream crossings. Four sites were identified as high priority for repairs/improvements in 2024. Water Pollution Control Department plans on performing repairs/improvements on these sites in 2024. In addition, the MS4 group will review the report and identify sites that may be worth investigating for potential release of pollution.

The UG is also working on identifying all septic systems through multiple data sources that may identify septic systems the UG was unaware of. The data sets may also assist in identifying sites with potential release from septic systems.

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

The use of Lucity continues to improve efficiency and accuracy of the information gathered for the MS4 program as the UG expands the capability of the program to track and store MS4 related data.

The Construction Site Stormwater Runoff Program continues to be a strong program. The improvements in 2022 have led to an increase in compliance from contractors constructing houses on lots under 1-acre in 2023. The increased presence of UG inspections and notifications to contractors increased the compliance with erosion and sediment control and directly improved water quality.

### **Aspects of the Program Providing Future Opportunities for Improvement.**

The IDDE and Post-Construction programs will be targeted for improvements in 2024. The UG will begin preparing comprehensive program guides similar to the one created for the Construction Site Stormwater Runoff Program. Work on the IDDE guide was started in 2023 but due to uncertainty with proposed changes to the MS4 permit proposed by KDHE, the UG postponed completing a draft of the IDDE guide late in 2023.

### **The Most Successful Part of the Program.**

Overall the UG has been successful in implementing and managing each aspect of the MS4 program. In particular, the Construction Site Runoff program continues to be a great success due to enforcement and increased number of inspections of residential construction was very successful.

### **The Most Challenging Aspect of the Program.**

One of the most challenging aspects of the program is IDDE tracing of non-point source pollutants as it relates to TMDL wet weather tracing. While most bacteria loads are assumed to be related to failing septic systems or broken sanitary sewer mains, identifying other possible sources of bacteria loads has been very challenging.

Another aspect that has been challenging is getting compliance reports from private owners of STFs. The UG is planning to prepare a comprehensive guide for the program as well as reviewing methods to encourage better compliance from private STF owners, possibly through enforcement actions.

### **The City/County Area MS4 Cleanups.**

In 2023 the UG continued to implement effective actions regarding cleanups. The UG partnered with the Kansas City, Kansas Police Department, Solid Waste Division of Public Works, Friends of the Kaw, Mid-America Regional Council (MARC), and Wyandotte County Conservation District (WCCD). The Engineering Department provided trash bags with the UG Logo and an educational message, "Your Litter Could End up in Local Rivers, Streams, and Lakes! Please Do Not Litter!" They also coordinated with the Public Works Street Department to pick up the trash bags and disposed of them when the event is complete. The UG Police Department also participates in off the clock community cleanup events throughout the year.

### **Elected Official Participation in Stormwater Pollution Reduction/Elimination.**

As always, elected officials are updated annually about the status and accomplishments of the Stormwater Management Program.

### **Collaboration with Other Organizations.**

The success of many of the UG's programs can be attributed to the strong partnerships and collaborations with other metro organizations. The UG is continuing its partnership with the Wyandotte County Conservation District which managed free soil testing and various environmental education events. The UG continues to be an active member in the Water Quality Education Committee organized by MARC. This committee includes representatives from multiple cities and communities in the metro area, encouraging sharing of ideas and promoting a uniform message on water quality in the region. Other active partnerships include Friends of the Kaw, and other local organizations.

### **Audits/Inspections Conducted by KDHE or EPA.**

The UG was not audited during this Annual Report reporting period but was asked to follow up on several requests from KDHE and EPA offices.

**IN ADDITION**, provide the following:

1. A current copy of the Stormwater Management Program (SMP) Document as a PDF file along with the Annual Report.
2. Include an executive summary to this report which briefly covers the major aspects of the MS4 stormwater management program enacted during the year. In completing the executive summary, the preparer should address the following questions:
  1. Were there any aspects of the program that appeared especially effective at reducing pollutants in your stormwater discharge?
  2. Were there any aspects of the program that provided unsatisfactory results?
  3. What was the most successful part of the program?
  4. What was the most challenging aspect of the program?
  5. Describe any City/County area MS4 clean-ups and the participation.
  6. Describe the elected officials' participation in the stormwater pollution elimination.
  7. Describe the collaboration with other organizations to eliminate stormwater pollution.
  8. If an audit/inspection of your MS4 program was conducted by EPA or KDHE during the year, list the items the audit/inspection report identified as required changes and provide a narrative explanation of how the changes were implemented or explain the plan to implement the changes and identify a target date for final implementation.

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

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

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

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

1. Provide the status of compliance with permit conditions, an assessment of the appropriateness of the implemented Best Management Practices, progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP), and the measurable goals with an indication of the progress toward meeting the goals for each of the six minimum control measures.
2. Provide results of information collected and analyzed, (for example test results, surveys, or public comments/input) during the annual reporting period. This may include monitoring data used to assess the success of best management practices with respect to reduction in pollutant discharge. Include an interpretation of the information which addresses success or failure of the portion of the program for which the information applies.
3. Provide results of information collected and analyzed, if any, during the annual reporting period,

including monitoring data used to assess the success of the program at reducing the TMDL regulated pollutants.

4. Provide a summary of the stormwater activities that were scheduled to be undertaken during the previous calendar year and the status of these activities.
5. Provide a summary of the stormwater activities which are scheduled to be undertaken during the next calendar year (including an implementation schedule).
6. Provide a map showing changes in the permittee's Permit Area if the permit area has changed within the year.
7. Provide a description of significant changes in any of the BMPs.
8. Provide copies of any ordinances or resolutions which were updated in the last year and are associated with the SMP. Please note, page on of this report requires submission of any new stormwater related ordinances or resolutions or any such updated ordinances or resolution be submitted with this annual report.
9. Provide a list of other parties (such as other municipalities or consultants), which are responsible for implementing any of the program areas of the Stormwater Management Program.
10. For Phase I permittees only, provide a summary of the inspection results, including the wet weather surface water quality monitoring test results, and information obtained under PART III Monitoring Industrial Stormwater Discharges section of this permit.

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

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

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

### **1. Public Education and Outreach**

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

### **2. Public Involvement and Participation**

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

### **3. Illicit Discharge Detection and Elimination**

The permittee shall:

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



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

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

#### **4. Construction Site Stormwater Runoff Control**

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

- a. Permittees which have the authority to enact ordinances or resolutions shall enact such ordinances or resolutions to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State and Local law;
- b. Requirements for construction site owners or operators to implement appropriate erosion and sediment control best management practices;
- c. Requirements for construction site owners or operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that are likely to cause adverse impacts to water quality;
- d. Procedures for site plan review which incorporate consideration of potential water quality impacts;
- e. Procedures for receipt and consideration of information submitted by the public;
- f. Procedures for site inspection and enforcement of control measures.

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

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

- a. BMP's to prevent or minimize adverse water quality impacts;
- b. Strategies which include a combination of structural and/or non-structural BMP's appropriate for the municipality;
- c. For permittees which have the authority, ordinances or resolutions to address post-construction runoff from new development and redevelopment projects to the extent allowable under State and local law;
- d. Ensure adequate long-term operation and maintenance of BMP's

## 6. Pollution Prevention/Good Housekeeping for Municipal Operations

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

### B. Stormwater Management Program

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

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

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

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

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

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

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

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

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

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

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Regulated TMDL Parameter</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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.	Bacteria	The UG has 11 pet waste receptacles in 8 parks. Each station has signage encouraging proper waste disposal. No new stations were installed in 2023. Approximately 8,000 bags were distributed. A map and summary of the sites can be found in Appendix 7.A.	1
TMDL-05	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.  Alternately, post the document on social media or the municipal website.	Bacteria	The pet waste flyer and distribution of flyers can be found in Appendix 1.B	1
TMDL-06	Distribute "Only Rain Down the Drain" door hangers or similar document.	Bacteria	The flyer is available in various locations around Wyandotte County. The flyer is also available on the UG website. A summary of the audience reached can be found in Appendix 1.B.	2

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

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Regulated TMDL Parameter</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
TMDL-07	Inspect 10% of all known MS4 outfalls for dry weather discharges either annually or twice per year to identify potential illicit discharges.	Bacteria	The UG performed 4,347 inspections on 2,223 unique structures out of 12,677 (17.5%) in 2023. Two suspected illicit discharges were identified. Follow up by UG staff verified there was no illicit discharge. The summary of inspections was too big for the Appendices. A summary of outfall inspections is available upon request.	3
<b>TOTAL POINTS CLAIMED FOR TMDL</b>				<b>7</b>

**C. Total Maximum Daily Load (TMDL) – Surface Water Monitoring Best Management Practices**

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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).	The UG obtained the required samples for 2023. A summary and interpretation of the sample results can be found in Appendix 8.A.	N/A
TMDLSWM-2	Perform analysis of samples obtained from sampling activities	The lab results and graphs of the 2023 results can be found in Appendix 8.B.	N/A
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.	Maps can be found in Appendix 8.C.	N/A

**D. Stormwater Management Program Requirements (Six Minimum Controls)**

**1. Public Education and Outreach (Table)**

List all of the public education and outreach BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
PE&O-01	Maintain a stormwater webpage for the permittee.	The webpage is checked on at least once on the minimum monthly basis. A summary of changes to the website can be found in Appendix 1.A.	<b>2</b>
PE&O-02	Distribute educational materials (either flyers, brochures, catalog mailings, handouts, or emails) addressing various pertinent stormwater public education topics.	Census housing units' value for the permit area is 68,397. In 2023 the UG reached 144,137 households/persons. Copies of materials and a summary of distribution can be found in Appendix 1.B.	<b>2</b>
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.	In 2023, the UG mailed educational materials to 57 automotive businesses and 24 Landscaping businesses. The educational flyer and summary of distribution can be found in Appendix 1.B. Mailing lists can be found in Appendix 1.C.	<b>2</b>



**D. Stormwater Management Program Requirements (Six Minimum Controls)**

**1. Public Education and Outreach (Table)**

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
PE&O-05	Post the municipality’s MS4 permit and SMP document on either the stormwater web page or the municipal webpage.	Both documents were posted in early March of 2023 which exceeds required 6-months. A screenshot of the website with the documents can be found in Appendix 1.D.	<b>1</b>
PE&O-06	Provide either a stormwater telephone hotline or web based or text message method for public reporting of illicit discharges.	The UG has a public hotline referred to as 311 that allows citizens to report complaints/concerns including illicit discharges. In 2022 the UG Engineering Division received 16 calls relating to stormwater issues from 311. None of the calls were related to illicit discharges. Responses for this report are only included when the calls are related to illicit discharges. A summary of stormwater related calls can be found in Appendix 1.E.	<b>2</b>
PE&O-09	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.	The UG operated a table at three events where educational materials were distributed. A total of 1,124 people attended these events. The Wyandotte County Conservation District operated a booth at one event with approximately 979 in attendance. A summary of materials distributed can be found in Appendix 1.B. A summary can be found in Appendix 1.F.	<b>1</b>
	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.		
	3. And finally, a single point can be claimed for operating an information booth at a public event where at least an estimated 200 or more individuals attend.		

**D. Stormwater Management Program Requirements (Six Minimum Controls)**

**1. Public Education and Outreach (Table)**

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
PE&O- 10	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.	The UG provided an educational postcard to all Landscaping services within the UG jurisdiction. The postcard can be found in Appendix 1.B and mailing list in Appendix 1.C.	<b>2</b>
PE&O-12	Create a stormwater information brochure to provide to the public at public meetings and/or hearings	The UG has a display with stormwater related brochures located near Commissioner meetings which are held twice per month. The list of brochures can be found in Appendix 1.B	<b>1</b>
<b>TOTAL POINTS CLAIMED FOR PUBLIC EDUCATION AND OUTREACH</b>			<b>13</b>

## 2. Public Involvement and Participation (Table)

List all of the public involvement and participation BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the table below should add up to a minimum of 6 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
P I/P-06	Establish a program to encourage residents to install stormwater treatment best management practices on their property.	Ten households participated in the cost-share program in 2023 with the UG reimbursing participants a total of \$7,600.88. A summary can be found in Appendix 2.A. A link to the program is included: <a href="https://www.wycokck.org/Engage-With-Us/News-articles/Stormwater-Quality-Cost-Share-Program">https://www.wycokck.org/Engage-With-Us/News-articles/Stormwater-Quality-Cost-Share-Program</a>	<b>3</b>
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>	The UG distributes and provides displays at several locations for the public. The materials and display locations can be found in Appendix 1.B.	<b>5</b>
P I/P-10	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.	The UG employed an intern through the VISTA program during calendar year 2023. The emphasis of their work and research focused on stormwater related issues. He received the same MS4 training as regular UG employees. A summary can be found in Appendix 2.B. <b>Points Earned = 2</b>	<b>2</b>
<b>TOTAL POINTS CLAIMED FOR PUBLIC INVOLVEMENT AND PARTICIPATION</b>			<b>10</b>

### 3. Illicit Discharge Detection and Elimination

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

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a program/plan been developed and is it presently implemented to detect and address illicit/prohibited discharges into the MS4?</p> <p>If yes, describe the plan below:</p> <p>There are several ways the UG currently employees to detect and address illicit/prohibited discharges. During dry weather inspections if a discharge is found samples are collected and follow up investigations are done to determine the source of the discharge. The UG utilizes a call center, 3-1-1, where citizens can call in and report suspected/potential discharges to the MS4. Employees are trained on an annual basis to look for suspected/potential discharges while out in the field working. Through a collaboration with multiple departments in the UG, efforts are made to detect and correct illicit/prohibited discharges.</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Has a map of the MS4 been developed, showing the location of all outfalls, either pipes or open channel drainage, showing names and location of all streams or lakes receiving discharges from the outfalls? If yes, attach map. (See Appendix 8.C)</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The permit may require the permittee enact ordinances, or resolutions. Have ordinances, or resolutions, or regulations to prohibit non-stormwater discharges into the storm sewer system been enacted?</p> <p>If yes, list ordinances/resolutions and their effective dates below:</p> <p>Effective Date: 06/02/2005</p> <p>Code of Ordinance Chapter 30 Sewers and Sewage Disposal, Article V Discharge Regulations, Section 30-123 Discharge to Storm Sewers &amp; Section 30-124 Prohibited Discharges</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Have the ordinances, resolutions, or regulations been modified?</p> <p>If yes, list ordinances/resolutions and their effective dates below:</p> <p>Effective Date: 06/24/2021</p> <p>Code of Ordinance Chapter 30 Sewers and Sewage Disposal, Article V Discharge Regulations, Section 30-123 Discharge to Storm Sewers &amp; Section 30-124 Prohibited Discharges</p>

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

**3. Illicit Discharge Detection and Elimination (Table)**

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
IDDE-02	<p>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.</p>	<p>The UG policy is to require septic systems be abandoned and have the building tied-in to the public sewer system when a public system is within 200-ft of a property. Systems that are failing are required to obtain permits and are repaired or replaced to UG standards with final inspections by the UG. A summary can be found in Appendix 3.A.</p>	2
	<p>Alternately, upgrade or replace the failed system to restore performance.</p>		
IDDE-03	<p>Develop a spill response plan and, if appropriate, coordinate emergency response with other agencies or organizations.</p>	<p>A copy of the spill response plan can be found in Appendix 3.B.</p>	2

**3. Illicit Discharge Detection and Elimination (Table)**

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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 7 years the UG has only identified a handful of suspected illicit discharges and one confirmed illicit discharge at outfalls under CFR 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.</p>	<p>The UG performed 4,347 inspections on 2,223 unique structures out of 12,677 (17.5%) in 2023. Two suspected illicit discharges were identified. Follow up by UG staff verified there was no illicit discharge. The summary of inspections was too big for the Appendices. A summary of outfall inspections is available upon request.</p>	1

## 3. Illicit Discharge Detection and Elimination (Table)

BMP ID Number	Brief BMP Description	Progress Achieving Goal(s) (Measured Result)	Points Claimed
IDDE-05	<p>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.</p>	<p>The UG reserves this BMP for the event that the UG issues a press release and would like to claim points. Typically press releases from Public Works are rare. No press release for 2023.</p>	0
IDDE-06	<p>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.</p>	<p>In 2023 the UG inspected 43,041 feet or 2.9% of storm sewer. No illicit discharges or illicit connections were identified. Pipe ratings ranged from 0 to 101. A summary can be found in Appendix 3.D.</p>	3

## 3. Illicit Discharge Detection and Elimination (Table)

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
IDDE-08	Implement a program to increase the reliability of sanitary sewer pump stations above the minimum standard design requirements.	In 2023, the UG did not perform any improvements to pump stations that match the Measurable Goals of this BMP.	<b>0</b>
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 reports to the KDHE for Household Hazardous Waste are submitted by the fiscal year (July 1, 2022 to June 30, 2023) and do not coincide with the MS4 reporting calendar. The UG hosts Household Hazardous Waste Collection Events 7 times per year. The UG contributed \$152,177.20 during this reporting period. A copy of the report can be found in Appendix 3.F.	<b>2</b>
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.	The UG performed 4,347 inspections on 2,223 unique structures out of 12,677 (17.5%) in 2023. Two suspected illicit discharges were identified. Follow up by UG staff verified there was no illicit discharge. The summary of inspections was too big for the Appendices. A summary of outfall inspections is available upon request.	<b>5</b>
<b>TOTAL POINTS CLAIMED FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>			<b>15</b>



#### 4. Construction Site Stormwater Runoff Control

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

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development/redevelopment projects been enacted?</p> <p>If yes, list ordinances/resolutions and their effective dates below:  <i>Effective Date: 12/14/2006</i>  <i>Code of Ordinance Chapter 8 Buildings and Building Regulations, Article XIV Land Disturbance, Section 8-614 Erosion and Sediment Control Plan</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a copy of the ordinances or resolutions been submitted to KDHE as required by the permit?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure or program been developed requiring construction site owners and/or operators to implement appropriate erosion and sediment control best management practices?</p> <p>If yes, describe plan below:  <i>In March of 2023, the Construction Site Stormwater Runoff Control Program Guide was finalized. This is a step-by-step guide through the entire process; permit review procedure, inspection procedure, enforcement process, abatement process, and the process for issuing abatement invoices, and if necessary, lien notification letter.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure or program been developed requiring construction site owners and/or operators to control waste such as discarded building materials, concrete truck washout, chemicals, paint, litter, and sanitary waste at construction sites likely to cause adverse impacts to water quality?</p> <p>If yes, describe procedure/program below:  <i>Through the permit review process the UG is able to ensure that all necessary BMPs are included on all plan sets.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure been developed and implemented requiring site plan review which includes consideration of potential water quality impacts?</p> <p>If yes, describe procedure below:  Stormwater management plans are required to be incorporated into the public improvement plans and/or site development plans.  <i>Code of Ordinance Chapter 8 Buildings and Building Regulations, Article XV Post-Construction Stormwater Treatment, Section 8-634 Stormwater treatment facility plan and report requirements</i></p>

**4. Construction Site Stormwater Runoff Control**

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure been developed for the receipt and consideration of information submitted by the public?</p> <p>If yes, describe procedure below:  <i>Through the use of the UG's hotline, 3-1-1, the public can call in and report any issues or concerns they may have.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure been developed and implemented for construction site inspection and enforcement of the control measures?</p> <p>If yes, describe procedure below:  <i>For all development sites within the MS4 boundaries over an acre, the contracting company is responsible for hiring a 3<sup>rd</sup> party company to perform routine inspections and for all sites under an acre, routine inspections are performed in house. Code of Ordinance Chapter 8 Buildings and Building Regulations, Article XIV Land Disturbance, Section 8-615 Inspections</i></p>

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

**4. Construction Site Stormwater Runoff Control (Table)**

List all construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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.	The UG ordinances requires a SWPPP and Erosion and Sediment Control Plan in accordance with the KDHE requirements for sites over 1-acre and requires erosion and sediment control measures be installed on sites under one acre per in accordance with UG Standard Details. A copy of the ordinances can be found in Appendix 10.A. A copy of the <i>Construction Site Stormwater Runoff Control Program Guide</i> can be found in Appendix 4.A.	<b>2</b>
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.	The Guidelines for Preparing Erosion Control Drawings for Land Development can be found on the UG website. <a href="https://www.wycokck.org/Departments/Public-Works/Stormwater-Runoff-Management/DevelopersDevelopment-Requirements">https://www.wycokck.org/Departments/Public-Works/Stormwater-Runoff-Management/DevelopersDevelopment-Requirements</a>	<b>2</b>

**4. Construction Site Stormwater Runoff Control (Table)**

List all construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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.	A weblink to the site plan review process can be found: <a href="https://www.wycokck.org/Departments/Planning-Urban-Design/Applications">https://www.wycokck.org/Departments/Planning-Urban-Design/Applications</a>	<b>2</b>
CSSRC-05	<p>Establish effective requirements for construction sites to control wastes. Develop through ordinance or other enforceable means requirements for construction site</p> <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"> <li>• Discarded building materials</li> <li>• Concrete</li> <li>• Truck washout</li> <li>• Chemicals</li> <li>• Litter</li> <li>• Sanitary waste</li> </ul>	The ordinances include a provision for contractors to control construction waste. A copy of the ordinances can be found in Appendix 10.A. A copy of the <i>Construction Site Stormwater Runoff Control Program Guide</i> can be found in Appendix 4.A.	<b>2</b>
CSSRC -06	Develop written procedures for inspection of construction sites. Develop a Stormwater Construction Site Inspection Guide for use by municipal inspectors.	In 2022 the UG created and in 2023 the UG implemented the <i>Construction Site Stormwater Runoff Control Program Guide</i> . A copy of the Inspection Guide can be found in Appendix 4.A.	<b>2</b>

**4. Construction Site Stormwater Runoff Control (Table)**

List all construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
CSSRC -07	Acquire or develop a software tracking system to track inspections and related tasks.	<p>The Unified Government of Wyandotte County/KCK has implemented Central Square EAM (formerly known as Lucity) to track and manage the Stormwater Management Program.</p> <p>It is configured to track:</p> <ul style="list-style-type: none"> <li>• Public Education and Outreach events and documentation</li> <li>• Public Involvement and Participation events and documentation</li> <li>• Stormwater Citizen Requests</li> <li>• Illicit Discharge Detection and Elimination inspections and documentation</li> <li>• Construction Site Stormwater Runoff Sites and inspections</li> <li>• Post-Construction Stormwater Treatment Facility (STF) Sites and “Assets” (public or private)</li> <li>• Detention/Retention Basins sites and assets</li> <li>• TMDL documentation</li> <li>• Industrial Stormwater Activities inspections and documentation</li> </ul> <p style="text-align: center;"><b>Points Earned = 1</b></p>	<b>1</b>
<b>TOTAL POINTS CLAIMED FOR CONSTRUCTION SITE STORMWATER RUNOFF CONTROL</b>			<b>11</b>

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

List all post-construction stormwater management BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

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

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development and redevelopment projects been enacted?</p> <p>If yes, list ordinances/resolutions and their effective dates below:  <i>Effective Date: 5/6/2010 Code of Ordinance Chapter 8 Buildings and Building Regulations, Article XIV Land Disturbance</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a copy of the ordinances or resolutions been submitted to KDHE as required by the permit?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a post-construction stormwater runoff program been implemented?</p> <p>If yes, describe the program below:  <i>All sites located within the MS4 boundaries that have Stormwater Treatment Facilities or Detention Basin on their property are required to submit annual certifications for each facility by November 1<sup>st</sup> of that year. All certifications must be stamped by a Certified Professional Engineer licensed in the state of Kansas. Code of Ordinance Chapter 8 Buildings and Building Regulations, Article XV Post-Construction Stormwater Treatment.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have post-construction sites been inspected? *
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are BMP's specified to minimize adverse water quality impacts?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have strategies been developed to include a combination of structural and/or non-structural BMP appropriate for the municipality?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Have measures been implemented to ensure adequate long-term operation and maintenance of structural BMP's? *</p> <p>If yes, describe measures below:  <i>All sites located within the MS4 boundaries that have Stormwater Treatment Facilities or Detention Basin on their property are required to submit annual certifications for each facility by November 1<sup>st</sup> of that year. All certifications must be stamped by a Certified Professional Engineer licensed in the state of Kansas. Code of Ordinance Chapter 8 Buildings and Building Regulations, Article XV Post-Construction Stormwater Treatment, Section 8-639 Annual Certifications.</i></p>

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

List all post-construction stormwater management BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

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

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

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

List all post-construction stormwater management BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
PCSM-01	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	The UG has adopted a modified version of the APWA 5600 and MARC/APWA BMP Manual which can be found here: <a href="https://www.wycokck.org/Departments/Planning-Urban-Design/Engineering">https://www.wycokck.org/Departments/Planning-Urban-Design/Engineering</a>	5



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

List all post-construction stormwater management BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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"> <li>• Detention ponds</li> <li>• Retention ponds</li> <li>• Grass swales</li> <li>• Pervious paving systems</li> <li>• Wetlands</li> <li>• Vegetative filter strips</li> <li>• Manufactured stormwater treatment devices (swirl separators, screens, etc.)</li> <li>• Drop inlet-catch basin</li> </ul>	<p>The UG has a program to maintain STFs owned and/or operated by the UG. The UG follows the MARC APWA for operation and maintenance as well as the <i>Long Term Maintenance Plan for Unified Government Owned Stormwater Treatment Facilities</i> implemented in 2022. A copy of the <i>Long Term Maintenance Plan for Unified Government Owned Stormwater Treatment Facilities</i> can be found in Appendix 5.A.</p>	2

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

List all post-construction stormwater management BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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	The UG inspects all UG Owned STFs annually. The summary of inspections can be found in Appendix 5.B. A list of maintenance needs is available upon request.	<b>2</b>
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 UG Post-Construction Program requires that private owners of STFs must inspect their STFs annually and provide a report to the UG which documents any deficiencies and resolutions of deficiencies. The UG received reports, certification, or correction plan from 25 of 94 (27%) of owners in 2023. A summary of private STFs can be found in Appendix 5.C.	<b>2</b>
<b>TOTAL POINTS CLAIMED FOR POST-CONSTRUCTION SITE STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT</b>			<b>11</b>

**6. Municipal Pollution Prevention/Good Housekeeping. (Table)**

List all municipal pollution prevention / housekeeping BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

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

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The permit requires the permittee to enact a program to address pollution prevention/good housekeeping for Municipal Operations. Has such a program been enacted?</p> <hr/> <p>If yes, describe program below:  <i>Standard Operational Procedures have been developed for the following; Pesticide, Herbicide, and Fertilizer application, Vehicle Washing, and Street Sweeping. A pollution prevention training program has been developed and each year employees from Streets, Fleet, Solid Waste, Parks &amp; Rec, Code Enforcement and Engineering are trained. A stormwater inlet inspection and cleaning program has been established.</i></p>

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

**6. Municipal Pollution Prevention/Good Housekeeping. (Table)**

List all municipal pollution prevention / housekeeping BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
PP/GH-03	<p>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.</p>	<p>All staff and contractors are required to be certified and apply PHFs in compliance with the SOP. A copy of the SOP <i>SMP-08 - PHF Application - Rev. 2021</i> can be found in Appendix 11.A.</p>	1
PP/GH-04	<p>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.</p>	<p>The Fleet Maintenance facility operates a vehicle/equipment washing facility on-site. An SOP was created as guidance on proper usage. A copy of the SOP <i>SMP-03 - Vehicle Washing - Rev. 2021</i> can be found in Appendix 11.A.</p>	1

**6. Municipal Pollution Prevention/Good Housekeeping. (Table)**

List all municipal pollution prevention / housekeeping BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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.	The UG uses the Snowplow route list as the street sweeping list and sweeps these streets at least three times per year. The sweepings are taken to a transfer station at 47 <sup>th</sup> and Orville and then transferred to the landfill. A summary of street sweeping activities and a map of the street sweeping routes can be found in Appendix 6.A.	<b>2</b>
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.	In 2023 the UG held nine training sessions both in-person and virtual reaching a total of 143 staff. A summary of the training events and sign-in sheets can be found in Appendix 6.B. Training materials are available upon request.	<b>1</b>
PP/GH-07	Implement a program to inspect stormwater inlets to identify illicit discharges and clean drop inlets of accumulated debris.	The UG performed 4,347 inspections on 2,223 unique structures out of 12,677 (17.5%) in 2023. Inlets are cleaned as needed if inspections find debris. Two suspected illicit discharges were identified during inspections. Follow up by UG staff verified there was no illicit discharge. The summary of inspections was too big for the Appendices. A summary of outfall inspections is available upon request.	<b>2</b>
PP/GH-08	Develop, implement, and keep updated an online storm sewer map accessible to the public.	The map can be found here: <a href="https://www.wycokck.org/Departments/Maps-and-GIS">https://www.wycokck.org/Departments/Maps-and-GIS</a> [wycokck.org]	<b>2</b>

**6. Municipal Pollution Prevention/Good Housekeeping. (Table)**

List all municipal pollution prevention / housekeeping BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>	<b>Points Claimed</b>
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.	All salt storage areas are covered. There were no construction activities this year on a new canopy or other covered area.	<b>0</b>
	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.		
<b>TOTAL POINTS CLAIMED FOR MUNICIPAL POLLUTION PREVENTION/GOOD HOUSEKEEPING</b>			<b>9</b>

**7. Industrial Stormwater Runoff Management Program (Table)**

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

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

YES	NO	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Has the permittee developed and maintained a list of the municipal industrial facilities contributing to the pollutant loading to the MS4? *
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have at least two municipal industrial facilities on the list had inspection and sampling conducted? Pentair and Harcros – Requested updates to SWPPPs to be in compliance with permit.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If the answer to items 1 and 2 is “No,” provide a statement. _____

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

**7. Industrial Stormwater Runoff Management Program (Table)**

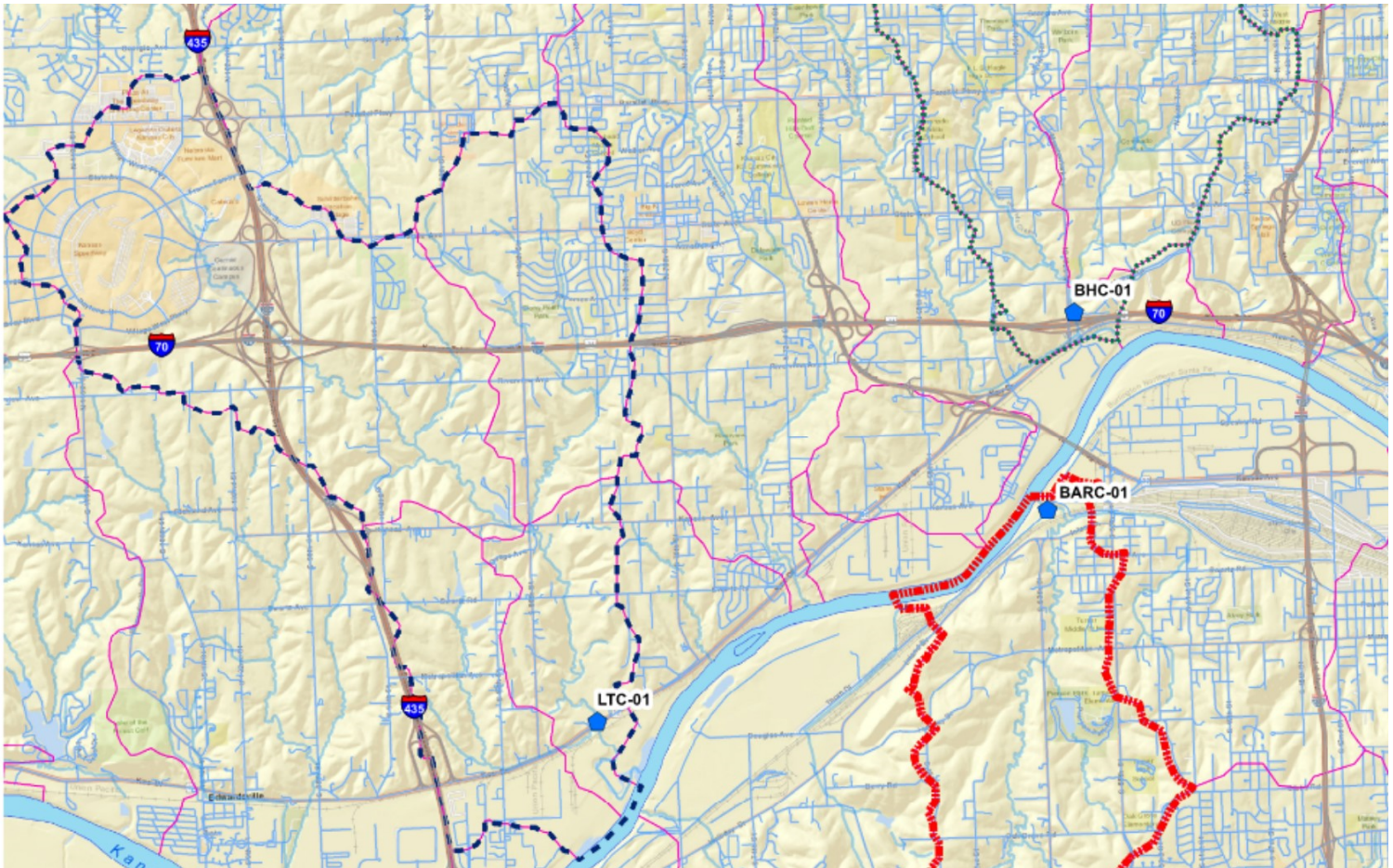
<b>BMP ID Number</b>	<b>Brief BMP Description</b>	<b>Progress Achieving Goal(s) (Measured Result)</b>
ISD-01	Maintain a set of Standard Operating Procedures for identifying facilities to include in Industrial Stormwater Registry, inspections, and enforcement.	No revisions were made to the SOPs in 2023. Copies can be found in Appendix 11.A.
ISD-02	Maintain a Registry of Industrial Facilities as defined by 40 C.F.R. 122.26(d)(2)(iv)(C)	The registry is updated annually. No revisions to the registry were made in 2023. One potential site was identified in 2023 and will be investigated to determine if it belongs on the registry. The registry can be found in Appendix 9.A
ISD-03	Maintain an inspection program of industrial facilities on the Industrial Stormwater Registry	The UG inspected Harcros and Pentair in 2023. Both sites were found to be generally in compliance with their SWPPPs. The UG identified areas for improvements including revisions to the maps that will bring them into complete compliance with the KDHE Permit. Stormwater samples were obtained at outfalls of both sites and analyzed. The results of the inspections and a summary of the sample results can be found in Appendix 9.B.



7. Industrial Stormwater Runoff Management Program (Table)

**E. Recordkeeping and Reporting**

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



Sample Site Information Tables

KEIMS Site Name	BARC-01	BHC-01
Sample Location Description	Samples are taken on the downstream side of a culvert where Thorn Dr. crosses Barber/Davis Creek. Samples are obtained utilizing a systolic pump and tubing dropped over the side of the culvert.	Samples are taken on the downstream side of a bridge where T Muncie Dr. crosses Brenner Heights Creek. Samples are obtained utilizing a systolic pump and tubing dropped over the side of the bridge.

Lat/Long Data Decimal Degree Format (not degree-minutes-seconds)		
Latitude	-94.71334°	-94.70903°
Longitude	38.08781°	39.10632°

KEIMS Site Name	LTC-01
Sample Location Description	Samples are taken on the downstream side of a bridge where Kaw Dr. crosses Little Turkey Creek. Samples are obtained utilizing a systolic pump and tubing dropped over the side of the bridge.

Lat/Long Data Decimal Degree Format (not degree-minutes-seconds)	
Latitude	-94.77148°
Longitude	39.06857°

## **F. RECORDKEEPING AND REPORTING - Part V of Permit – 2023**

### **EFFECTIVENESS OF SOURCE CONTROLS AND BMPS**

#### **INTRODUCTION**

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

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

#### **1. COMPLIANCE WITH PERMIT CONDITIONS**

The UG was compliant with Permit conditions during the 2023 year and earned the following point totals for the following Six Minimum Controls.

<b>MINIMUM CONTROL</b>	<b>Points Required</b>	<b>Points Earned</b>
Public Education and Outreach	7	13
Public Involvement/Participation	6	10
Illicit Discharge Detection and Elimination	7	15
Construction Site Stormwater Runoff Control	6	11
Post-Construction Stormwater Management in New Development and Redevelopment Projects	7	11
Pollution Prevention/Good Housekeeping for Municipal Operations	6	9
Total Maximum Daily Load (TMDL) Best Management Practices and Surface Water Monitoring	6	7

#### **APPROPRIATENESS OF BMPs AND PROGRESS TOWARDS REDUCING POLLUTANTS**

The BMPs are generally considered to be appropriate for the local population and pollution sources and no specific concerns have been identified in 2023.

The UG continues to implement all programs of the MS4 and continues in progress to reducing pollutant loads to the maximum extent practicable (MEP).

## **RESULTS OF INFORMATION COLLECTED AND ANALYZED**

TMDL pollutants are on a positive slope due to spikes in E. Coli. Analysis of the sample results may be found in Appendix 8.A. The UG is continuing to improve response to sample results that exceed 12,000 CFU/100mL. When sample results exceed 12,000, the UG WPC reviews SSR and CSR reports, and work orders to determine possible sources of the high result values. Further improvements include preparing an IDDE Program Guide.

## **SUMMARY AND INTERPRETATION OF WATER QUALITY RESULTS**

Generally, the results of the sampling events were consistent with results of previous years. There were five results out of twelve that were above 12,000 CFU/100mL which skewed the trends for all three creeks upward. The uptick in results is concerning and the UG is taking steps to improve response when sample results exceed 12,000 CFU/100mL and preparing additional investigation procedures to increase the chances of identifying possible sources of bacteria in the creeks. Currently when sample results exceed 12,000, the UG Water Pollution Control (WPC) staff reviews Sanitary Sewer Reports (SSR) and Combined Sewer Reports (CSR), and work orders to determine if WPC sewer leaks are the cause. Investigations were unable to identify a source for the elevated results. New septic system location data and a stream walking report will provide the UG with tools to identify sites for investigation in 2024. (See SUMMARY OF STORMWATER ACTIVITIES SCHEDULED FOR 2024 below for details)

### **Barber Creek**

Zero sample results exceeded 12,000.

### **Brenner Heights Creek**

Three sample results exceeded 12,000. WPC reviews and investigations were unable to identify any sources with high degree of certainty.

### **Little Turkey Creek**

Two sample results exceeded 12,000. WPC reviews and investigations were unable to identify any sources with high degree of certainty.

## **SUMMARY OF STORMWATER ACTIVITIES SCHEDULED FOR 2024**

The UG will continue to implement the same activities found in the 2020 Stormwater Management Plan that were undertaken in 2023.

Due to algal blooms that occurred in 2022 in the Wyandotte County Lake the Parks and Recreation Department engaged Benesch to perform a study to assist in identifying possible sources of nutrients and offer options for reducing and/or eliminating the sources. In 2023 the UG elected to add monitoring the water quality of Wyandotte County Lake to the MS4 Program.

In accordance with the new permit revisions and the 303d list the monitoring requirements for the current stream monitoring sites will include sediment and nutrients.

In 2023 the UG engaged a consultant firm to perform stream walks to identify and rate sanitary sewer stream crossings. Four sites were identified as high priority for repairs/improvements in 2024. The MS4 group will review the report and identify sites that may be worth investigating for potential release of pollution. The UG is also working on identifying all septic systems through multiple data sources that may identify septic systems the UG was unaware of. The data sets may also assist in identifying sites with potential release from septic systems.

### **SUMMARY OF PLANNED CHANGES**

The UG received a draft revised permit from the KDHE in December of 2023. The changes to the permit will require revisions to the SMP which will be finished in 2024.

#### **IDDE and Post-Construction**

After the successful implementation of the Construction Site Runoff Guide, the UG has elected to produce a similar comprehensive guide for the IDDE and Post-Construction Programs. The goal is to have these finished in 2024 and implemented in 2025.

### **STANDARD OPERATING PROCEDURES (SOPs)**

The UG continually reviews SOPs for effectiveness on an annual basis. Changes were made to the SOPs in 2023 to meet APWA standards but will not be finalized until 2024. A summary of revisions and updated SOPs can be found in Appendix 11.A.

**Certification**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

**Signature of Permittee:**  
**(Legally responsible person)**

**Date Signed** 2-1-24

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

**40 CFR 122.22 Signatories to permit applications and reports.**

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

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

Please note the submission requirements on page 1.

**KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT**

Municipal Programs Unit

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