



*City of Inver Grove Heights*

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**Stormwater Pollution Prevention  
Program  
(SWPPP)**

**Created in October 2022**

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*8150 Barbara Avenue • Inver Grove Heights, MN 55077  
651-450-2500 • 651-450-2502 (Fax)*

## **INTRODUCTION**

The city operates a Municipal Separate Storm Sewer System (MS4), which includes roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, storm drains, etc. In accordance with the Minnesota Pollution Control Agency (MPCA), MS4s in Minnesota must satisfy the requirements of the MS4 general permit. This permit is designed to reduce the amount of sediment and other pollutants entering state waters from stormwater systems. One of the requirements of this permit is to develop a Stormwater Pollution Prevention Program (SWPPP) and adopt best practices. These best practices are broken into six (6) Minimum Control Measures (MCMs). The City performs, and partners with other agencies, on actions to prevent pollution in accordance with these guidelines.

## **PURPOSE**

The purpose of the Stormwater Pollution Prevention Program (SWPPP) is to implement the requirements of the MS4 permit and promote citizen involvement to provide education and strategy for dealing with the quality of the water resources in IGH. Pollution prevention practices are needed because stormwater runoff is largely untreated before flowing to receiving waters. Specific and measurable goals (tracking measures) are created from the strategies and policies which provide information that is collected from departments throughout the City, collated, and sent to the MPCA each year in the form of a report. The annual report provides a snapshot in time that shows the progress that has been made since the previous year and provides evidence that the public system is functional.

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# **MS4 PROGRAM FRAMEWORK AND ACTIVITIES**



# City of Inver Grove Heights

## Activities and Procedures

### 16.1 MCM 1: Public Education and Outreach

**16.2.** Develop and implement a public education program to distribute educational materials or equivalent outreach that informs the public of the impact stormwater discharges have on waterbodies and that includes actions citizens, businesses, and other local organizations can take to reduce the discharge of pollutants to stormwater. Use existing materials if appropriate for the message or develop in-house educational materials. The City may partner with other MS4 permittees, community groups, watershed management organizations, or other groups to implement its education and outreach program.

#### 16.3. City-Selected High Priority Education Topics:

- Yard waste management – Education materials could include the following:
  - Proper handling of landscape waste such as grass clippings, leaves, tree and shrub trimmings, organic mulch, etc.
  - Proper fertilization
  - Composting
  - Benefits to water quality
- Household Chemical Handling and Disposal. Post a link to Dakota County website educational materials related to care and disposal of Household Chemicals, Wastes and medicines. Maintain an introduction on the City website of why proper care of these materials is important for maintaining water quality. The City may also bring selected flyers to in-person community events.

#### 16.4-16.6. MS4 Permit Required Education Topics:

- Illicit discharge recognition and how to report an illicit discharge if encountered. The City will continue to use a variety of approaches including brochures, newsletters, newspaper ads, website postings and public stormwater events.
- Impacts of deicing salt use on receiving waterbodies, methods to reduce deicing salt use and proper storage of salt. (residents, businesses, commercial facilities, institutions)
- Impacts of pet waste on receiving waterbodies, proper management of pet waste. Educational material also includes reference to pet waste city ordinance.

#### 16.7. Education and Outreach Plan

Target Audience – Residents, businesses, commercial facilities and institutions.

#### Specific Activities:

##### Annually

- Verify that information is available at City Hall or on the City website for public access.
- For previous year, review how many website hits occurred on city stormwater program webpage(s) and record that information for long term monitoring purposes and annual reporting.
- Distribute educational materials or equivalent that covers water quality best management practices for residents and businesses, including yard waste and management of pet waste.
- Distribute educational materials or equivalent that covers what illicit discharges are and who they should be reported to.
  
- Post on city stormwater program web page regarding water quality related topics.

- Distribute educational materials or equivalent on deicing salt use for winter ice control.
- Incorporate other types of media in stormwater education program (City website, social media). Add new or update material as needed.
- Review all stormwater program related webpages on the city website. Remove material that is out of date and no longer relevant. Check all web links and ensure they are active.

**16.8. Documentation:**

The City will document the following information related to public education and outreach:

- Documentation of a description on all specific stormwater-related issues identified in items 16.3-16.6.
- Documentation of all information required under the education and outreach plan in item 16.7.
- Documentation of activities held and the dates of said activities to reach the target audience.
- Data of quantities, descriptions, and dates of educational materials distributed.
- Estimate of how many participants were reached for each completed education activity.

**16.9. Annual Assessment:**

The City will conduct a yearly review of the public education program to evaluate program compliance and how each goal was reached. This assessment will be completed prior to the City's annual report and any modifications to the program will be noted.

- Assess status of achieving measurable requirements.
- Document any program modifications resulting from the assessment.



# City of Inver Grove Heights

## Activities and Procedures

### 17.1 MCM 2: Public Participation/Involvement

**17.2.** Develop and implement a public participation/involvement program to solicit public input on the SWPPP and involve the public in activities that improve or protect water quality.

#### **17.3. Public Opportunity to Provide Input on SWPPP**

- The city holds a public meeting/event.
- Provide residents an opportunity to give feedback on the City's website.
- After meeting, update NPDES annual report to include any comments by council or meeting attendees.
- Consider and respond to relevant input on the SWPPP or related documents, including modifications as a result of input received, from community members, staff, or contractors and developers. (17.5)

#### **17.4. Public Access to the SWPPP**

- Provide access on the SWPPP and related documents to the public as a hard copy upon request at the City Hall.
- Review and update information and information availability as needed.

#### **17.6. Public Involvement Activity**

- The City will provide water quality information at the City annual fall clean-up event.
- The City may sponsor other activities such as a rain barrel distribution event, rain garden workshop event or other water quality themed event.

#### Annually:

- Prepare information for annual fall clean-up event.
- Sponsor other activities, when held.

#### **17.7. Documentation**

The City will document the following information related to public participation/involvement of the SWPPP:

- All relevant written input received from the public regarding SWPPP.
- All city responses to the written input received from the public regarding SWPPP including modifications made to the SWPPP because of the written input received.
- All date(s), location(s), and estimated number of participants at the events held for the purpose of compliance with permit item (17.3).
- Notices provided to the public of any events and any electronic correspondences (e.g., website, email distribution lists, notices, etc.) scheduled to meet permit item (17.3).
- All date(s), location(s), description of activities and estimated number of participants at the events held for the purpose of compliance with permit item (17.6).

#### **17.8. Annual Assessment:**

The City will conduct a yearly review of the public participation/involvement program to evaluate program compliance and how each goal was reached. This assessment will be completed prior to the City's annual report and any modifications to the program will be noted.

- Assess status of achieving measurable requirements.
- Document any program modifications resulting from the assessment.





# City of Inver Grove Heights

## Activities and Procedures

### 18.1 MCM 3: Illicit Discharge Detection and Elimination (IDDE)

**18.2.** Develop, implement and enforce a regulatory program that prohibits non-stormwater discharge and hazardous material discharges into the City's MS4 stormwater system.

#### 18.3 Maintain a map of the City's MS4 system

- All pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes
  - Outfalls, including a unique identification number and an associated geographic coordinate
  - Structural stormwater BMPs
  - All receiving waterbodies
- Review and update map yearly to ensure data accuracy.

#### 18.4, 18.5, 18.6 Regulatory Mechanisms

##### Ordinances:

- Illicit Discharge: City Code, Title 9, Chapter 5, Section 13 - ILLICIT CONNECTIONS AND DISCHARGES TO THE MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)
- Pet Waste: City Code, Title 5, Chapter 4, Section 4.C. – ANIMAL CONTROL/REMOVAL OF ANIMAL FECES
- Salt Storage: City Code, Title 9, Section 5, (October 2022)
- Northwest Area Overlay District: Title 10, Section 13J (May 2007)

##### Standards:

- 4<sup>th</sup> Generation WRMP (2018)
  - Northwest Area WRMP (2006)
- Implement salt storage ordinance starting in 2022.
- Review ordinances, standards and policies annually and update as needed

#### 18.7 Illicit Discharge Inspection

- The City incorporates illicit discharge detection into all inspection and maintenance activities conducted in MCM 6 (items 21.9, 21.10, and 21.11).
- Where feasible, the City will conduct illicit discharge inspections during dry-weather conditions.

#### 18.8 - 18.9 Illicit Discharge Training

- At least once each calendar year, train field staff in illicit discharge recognition and reporting. Field staff includes police, fire, public works, and parks staff. Training may include videos, in-person presentations, webinars, training documents, and/or email.
- Training will be commensurate with staff responsibilities relating to the IDDE program including individuals responsible for investigating, locating, eliminating illicit discharges, and/or enforcement.
- Previously trained individuals will attend a refresher-training every three (3) calendar years.
- Hold annual training event to cover illicit discharge recognition and reporting.

**18.10 - 18.11 Priority Areas for Illicit Discharges**

- Maintain a written or mapped inventory of priority areas including:
  - a. land uses associated with business/industrial activities;
  - b. areas where illicit discharges have been identified in the past; and
  - c. areas with storage of significant materials that could result in an illicit discharge.
- Conduct additional regular illicit discharge inspections in the areas identified in the attached Sheet 1, 18.10 Priority Area list.

**18.12 Illicit Discharge Written Procedures**

- The City will implement written procedures for investigating, locating, and eliminating illicit discharges.
- See attached Sheet 2: IDDE Written Procedures.

**18.13 Emergency Response Procedures**

- The City will implement written procedures for responding to spills.
- See attached Sheet 3: Spill Response Procedures.

**18.14 Enforcement Response Procedures (ERPs)**

- The City will maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanisms.
- See attached Sheet 4: Enforcement Response Procedures

**18.15, 18.16, 18.17 Documentation**

The City will document the following information related to IDDE inspections:

- Date(s) and location(s) of IDDE inspections conducted in accordance with items 18.7 and 18.11;
- Reports of alleged illicit discharges received, including date(s) and any follow-up actions taken by the City;
- Date(s) of discovery of all illicit discharges;
- Identification of outfalls, or other areas, where illicit discharges have been discovered;
- Sources (including a description and the responsible party) of illicit discharges (if known); and
- Action(s) taken by the City, including date(s), to address discovered illicit discharges.

The City will document the following information related to IDDE training:

- General subject matter covered;
- Names and departments of individuals in attendance; and
- Date of each event.

The City will document the following information related to IDDE enforcement:

- name of the person responsible for violating the terms and conditions of the City's regulatory mechanism(s);
- date(s) and location(s) of the observed violation(s);
- description of the violation(s);
- corrective action(s) (including completion schedule) issued by the City;
- referrals to other regulatory organizations, if applicable; and
- date(s) violation(s) resolved.

**18.18. Annual Assessment**

The City will conduct a yearly review of the IDDE program to evaluate program compliance and how each measurable requirement was reached. This assessment will be completed prior to the City's annual report and any modifications to the program will be noted.

- Assess status of achieving measurable requirements.
- Document any program modifications resulting from the assessment.



# City of Inver Grove Heights

## Activities and Procedures

### 19.1 MCM 4: Construction Site Stormwater Runoff Control

19.2. Develop, implement and enforce a Construction Site Stormwater Runoff Control program. The program must address construction activity with a land disturbance of greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, within the City's jurisdiction and that discharge to the City's MS4 system.

#### 19.3, 19.4 Construction Stormwater General Permit (CSW Permit)

- Implement and enforce a regulatory mechanism that establishes requirements for erosion, sediment and waste controls that is at least as stringent as the most current CSW permit.
- Review yearly ordinance language and written procedures to ensure language is current with the CSW permit.
- Revise regulatory mechanisms, if necessary, within 12 months of the CSW permit being reissued.

#### 19.5 Regulatory Mechanisms:

- Erosion and Sediment Control ( City Code: Title 9, Chapter 5, Section 7); (October 2022).
- Review ordinances annually and update if needed.

#### 19.6, 19.7 Site Plan Written Procedures

The City will implement written procedures for the following:

- Site plan reviews conducted by the City prior to the start of all construction activities to ensure compliance with requirements of the regulatory mechanisms. See Sheet 8: Site Plan Review Written Procedures.
- Site inspections to determine compliance with the regulatory mechanisms. See Sheet 9: Construction Site Inspection Written Procedures.

#### 19.8 Priority Areas for CSW Permit Inspection

- Maintain written procedures for identifying high-priority and low-priority sites for inspection. See Sheet 10: Site Inspection Priority Procedures.

#### 19.9 Site Inspection Documentation

- The City will complete a written/electronic checklist to document each site inspection when determining compliance with the City's regulatory mechanism(s).
- See Sheet 11: Construction Site Inspection Checklist for an example checklist.

#### 19.10 Public Comment Written Procedures

- The City will implement written procedures for the receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the City.
- See attached Sheet 12: Written Procedures for Reports of Noncompliance.

#### 19.11 Construction Site Stormwater Runoff Control Program Training

- At least once each calendar year, train relevant staff in responsibilities as they relate to the City's Construction Site Stormwater Runoff Control program. Training may include videos, in-person presentations, webinars, training documents, and/or email.
- Training will be commensurate with staff responsibilities relating to the CSW Permit program including individuals responsible for conducting site plan reviews, site inspections, and/or enforcement.

- Previously trained individuals will attend a refresher-training every three (3) calendar years.
- Host a yearly training event to cover topics related to construction site inspection and stormwater runoff control.

**19.12 Enforcement Response Procedures (ERPs)**

- The City will maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanisms. ERPs must include a minimum of the following:
  - Description of enforcement tools available to the City and guidelines for the use of each tool
  - Name or position of responsible person(s) for conducting enforcement
- See Sheet 13: Construction Site Enforcement Response Procedures.

**19.13, 19.14, 19.15 Documentation**

The City will document the following information related to each site plan review **(See Sheet 14: Site Plan Review**

**Checklist):**

- Project name
- Location
- Total acreage to be disturbed
- Owner and operator of the proposed construction activity
- Proof of notification to obtain coverage under the CSW permit, as required in 19.6, or proof of coverage under the CSW permit
- Any stormwater related comments and supporting completed checklist used by the City to determine project approval or denial

The City will document the following information related to CSW permit training **(See Sheet 6: MS4 Training Documentation):**

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

The City will document the following information related to the ERP enforcement **(See Sheet 15: Construction Site ERP Notice of Violation):**

- name of the person responsible for violating the terms and conditions of the City's regulatory mechanism(s);
- Date(s) any verbal warnings were given.
- date(s) and location(s) of the observed violation(s).
- description of the violation(s).
- corrective action(s) (including completion schedule) issued by the City.
- referrals to other regulatory organizations; and
- date(s) violation(s) resolved

**19.16 Annual Assessment:**

The City will conduct a yearly review of the Construction Site Stormwater Runoff Control program to evaluate program compliance and how each measurable requirement was reached. This assessment will be completed prior to the City's annual report and any modifications to the program will be noted.

- Assess status of achieving measurable requirements.
- Document any program modifications resulting from the assessment.



# City of Inver Grove Heights

## Activities and Procedures

### 20.1 MCM 5: Post-Construction Stormwater Management

20.2. Develop, implement, and enforce a Post-Construction Storm Water Management Program that prevents or reduces water pollution after construction activity is completed. The program must address construction activity with any land disturbance of greater than or equal to one acre. This will include projects less than one acre that are part of a larger plan of development within the permittee's jurisdiction and that discharge to the permittee's MS4.

#### 20.3 Regulatory Requirements

- Implement and enforce a regulatory mechanism (e.g., ordinances, standards, permits, policies, plans) that establishes requirements for post-construction stormwater management meeting the requirements of the MS4 permit.
- Annually review ordinance language and written procedures to ensure language is current and consistent with the requirements of the MS4 permit.
- Revise regulatory mechanisms, if necessary, within 12 months of receiving MS4 permit. Due October 14, 2022.

#### 20.4-20.15 Regulatory Mechanism Contents:

- The City will require owners of construction activity to submit plans for review of post-construction BMPs designed to meet the requirements of permit sections 20.5 to 20.15. The City's primary mechanisms are the following:
  - Ordinance: Stormwater Management (Title 9, Chapter 5, October 2022)
  - Standards: Northwest Area Stormwater Manual (December 2006)
  - Standards: 4<sup>th</sup> Generation Water Resources Management Plan (December 2018)
- Update ordinance and/or design guide to address missing requirements
- Review ordinances and standards annually and update if needed.

#### 20.16 Inventory of Structural Stormwater BMPs (Not owned or operated by Inver Grove Heights)

- Maintain a written or mapped inventory of structural stormwater BMPs not owned or operated by the permittee that meet all of the following criteria:
  - The structural stormwater BMP includes an executed legal mechanism(s) between the permittee (City of Inver Grove Heights) and owners responsible for the long-term maintenance, as required in item 20.15; and
  - The structural stormwater BMP was implemented on or after August 1, 2013
- Provided in City GIS mapped inventory.

#### 20.17 Site Plan Review Written Procedures

The City will implement written procedures for the following:

- Site plan reviews conducted by the City prior to the start of all construction activities to ensure compliance with requirements of the regulatory mechanisms.
- **See Sheet 8: Site Plan Review Written Procedures.** These written procedures cover the review requirements for both MCM 4 and MCM 5.

### 20.18 Post-Construction Site Stormwater Runoff Control Program Training

- Annually train relevant staff in responsibilities as they relate to the City's Post-Construction program. Training may include videos, in-person presentations, webinars, training documents, and/or email.
  - Training will be commensurate with staff responsibilities relating to program.
  - Previously trained individuals will attend a refresher-training every three (3) calendar years.
- Host annual training event to cover topics related to post-construction site program.

### 20.19 Enforcement Response Procedures (ERPs)

- The City will maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanisms. ERPs must include a minimum of the following:
  - Description of enforcement tools available to the City and guidelines for the use of each tool.
  - Name or position of responsible person(s) for conducting enforcement.
- **See Sheet 13: Construction Site Enforcement Response Procedures.** These written procedures cover the ERP for both MCM 4 and MCM 5.

### 20.20, 20.21, 20.22 Documentation

The City will document the following information related to each site plan review

- **See Sheet 14: Site Plan Review Checklist.** These documentation procedures cover the requirements for both MCM 4 and MCM 5.
- Supporting documentation used to determine compliance.
- The water quality volume that will be treated through volume reduction practices compared to the total water quality volume required to be treated.
- Documentation associated with off-site treatment projects authorized by the permittee, including rationale to support the location of permanent stormwater treatment projects under permit sections 20.10 and 20.11.
- Payments received and used in accordance with item 20.14.
- All legal mechanisms drafted in accordance with item 20.15, including date(s) of the agreement(s) and name(s) of all responsible parties involved.

The City will document the following information related to Post-Construction Stormwater Management training

- **See Sheet 6: MS4 Training Documentation.**
- General subject matter covered
- Names and departments of individuals in attendance; and
- Date of each event

The City will document the following information related to the ERP enforcement

- **See Sheet 15: Construction Site ERP Notice of Violation:**
- Name of the person responsible for violating the terms and conditions of the City's regulatory mechanism(s);
- Date(s) any verbal warnings were given.
- Date(s) and location(s) of the observed violation(s).
- Description of the violation(s).
- Corrective action(s) (including completion schedule) issued by the City.
- Referrals to other regulatory organizations; and
- Date(s) violation(s) resolved

### 20.23 Annual Assessment:

The City will conduct a yearly review of the Post Construction Stormwater Management program to evaluate program compliance and how each measurable requirement was reached. This assessment will be completed prior to the City's annual report and any modifications to the program will be noted.

- Assess status of achieving measurable requirements.
- Document any program modifications resulting from the assessment.



# City of Inver Grove Heights

## Activities and Procedures

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

21.2. Develop, implement, and enforce, while existing permittees must revise an Operations and Maintenance Program that prevents or reduces the discharge of pollutants to the MS4 from permittee owned/operated facilities and operations.

#### 21.3 Inventory of City Owned/Operated Facilities

- Maintain a written or mapped inventory of City owned/operated facilities that contribute pollutants to stormwater discharges. The City must implement BMPs that prevent or reduce pollutants in stormwater discharges from all inventoried facilities.
- See Sheet 16: Inventory of City Owned/Operated Facilities.

#### 21.4. Pollution Prevention BMPs

- The City will implement BMPs that prevent or reduce pollutants in stormwater discharges from the following municipal operations that may contribute pollutants to stormwater discharges, where applicable:
  - Waste disposal and storage, including dumpsters.
  - Management of temporary and permanent stockpiles of materials such as street sweepings, snow, sand and sediment removal piles (e.g., effective sediment controls at the base of stockpiles on the downgradient perimeter).
  - Vehicle fueling, washing, and maintenance.
  - Routine street and parking lot sweeping.
  - Emergency response.
  - Cleaning of maintenance equipment, building exteriors, dumpsters, and the disposal of associated waste and wastewater.
  - Use, storage, and disposal of significant materials.
  - Landscaping, park, and lawn maintenance.
  - Road maintenance, including pothole repair, road shoulder maintenance, pavement marking, sealing, and repaving.
  - Right-of-way maintenance, including mowing.
  - Application of herbicides, pesticides, and fertilizers.

#### 21.5, 21.6 Snow and Ice Control Operations

- The City will implement the following BMPs at City owned/operated salt storage areas:
  - Cover or store salt indoors.
  - Store salt on an impervious surface.
  - Implement practices to reduce exposure when transferring material from salt storage areas (e.g., sweeping, diversions, and/or containment)
- Implement a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee. The policy must establish practices and procedures for snow and ice control operations (e.g. plowing or other snow removal practices, sand use, and application of deicing compounds).

### **21.7, 21.12 Operations and Maintenance Program Training**

- At least once each calendar year, the City will train relevant staff in responsibilities as they relate to the City's SWPPP, including reporting and assessment activities. Training may include videos, in-person presentations, webinars, training documents, and/or email. The training program must:
  - Address the importance of protecting water quality.
  - Discuss BMPs to minimize the use of deicers (e.g., proper calibration of equipment and benefits of pretreatment, pre-wetting, and anti-icing).
  - Include tools and resources to assist in winter maintenance (e.g., deicing application rate guidelines, calibration charts, Smart Salting Assessment Tool).
  - Cover the requirements of the permit relevant to the responsibilities of the individual not already addressed in items 18.8, 18.9, 19.11 and 20.18.
  - Include a schedule for initial training for individuals, including new and/or seasonal employees, and recurring training intervals to address changes in procedures, practices, techniques, or requirements.
- Host annual training event to cover topics listed above. This yearly spring training will occur for seasonal and current full-time employees. New full-time employees will receive this training immediately after their start date and then continue the normal spring schedule each year.

### **21.8 Pond Treatment Effectiveness Written Procedures**

- The City will implement written procedures for determining the TSS and TP treatment effectiveness of all City owned/operated ponds/BMPs constructed and used for the collection and treatment of stormwater.
- See Sheet 17: Pond Treatment Effectiveness Procedures.

### **21.9, 21.10, 21.11 Structural BMP Inspection Procedures**

- See Sheet 18: Inspections of BMPs, Outfalls, Stockpiles and Storage Areas
- Inspect structural stormwater BMPs (excluding stormwater ponds, which are under a separate schedule below) each calendar year to determine structural integrity, proper function, and maintenance needs unless the permittee determines either of the following conditions apply:
  - complaints received or patterns of maintenance indicate a greater frequency is necessary; or
  - maintenance or sediment removal is not required after completion of the first two calendar year inspections; the permittee may reduce the frequency of inspections to once every two (2) calendar years.
- Prior to the expiration date of the General Permit, the City will conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs.
- Based on inspection findings, the City will determine if repair, replacement, or maintenance measures are necessary in order to ensure the structural integrity and proper function of structural stormwater BMPs and outfalls. The City will complete necessary maintenance as soon as possible. If the City determines necessary maintenance cannot be completed within one year of discovery, the City will document a schedule(s) for completing the maintenance.

### **21.13, 21.14 Documentation**

The City will document the following information related to the operations and maintenance program

- See Sheet 19: Stormwater Inspection Report
- Date(s) and description of findings, including whether or not an illicit discharge is detected, for all inspections conducted in accordance with items 21.9 and 21.10.
- Any adjustments to inspection frequency as authorized in item 21.9.
- Date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected.
- Schedule(s) for maintenance of structural stormwater BMPs and outfalls as required in item 21.11.
- Stormwater management training events, including general subject matter covered, names and departments of individuals in attendance, and date of each event.



The City will document the following information related to pond sediment excavation and removal activities

- See Sheet 20: Pond Cleanout Documentation Form:
  - A unique ID number and geographic coordinates of each stormwater pond from which sediment is removed.
  - The volume (e.g., cubic yards) of sediment removed from each stormwater pond.
  - Results from any testing of sediment from each removal activity.
  - Location(s) of final disposal of sediment from each stormwater pond.

**21.15 Annual Assessment:**

The City will conduct a yearly review of the operations and maintenance program to evaluate program compliance and how each measurable requirement was reached. This assessment will be completed prior to the City's annual report and any modifications to the program will be noted.

- Assess status of achieving measurable requirements.
- Document any program modifications resulting from the assessment.

## **PERMIT PROGRAM ADDITIONAL MEASURES**



## City of Inver Grove Heights

### Activities and Procedures

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

The City does not have an applicable WLA not being met. The City demonstrated meeting the applicable WLA for the South Metro Mississippi River TTS as part of its 2021 application for permit coverage.



## City of Inver Grove Heights

### Activities and Procedures

### 23.1 Alum or Ferric Chloride Phosphorus Treatment Systems

The City does not have this type of treatment system.