



Minnesota Pollution Control Agency

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

MS4 SWPPP Application for Reauthorization

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

Doc Type: Permit Application

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

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

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

General Contact Information (*Required fields)

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

*MS4 permittee name: CAPITOL REGION WATERSHED DISTRICT *County: RAMSEY
(city, county, municipality, government agency or other entity)
*Mailing address: 1410 ENERGY PARK DRIVE, SUITE 4
*City: SAINT PAUL *State: MN *Zip code: 55108
*Phone (including area code): 651-644-8888 *E-mail: mark@capitolregionwd.org

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

*Last name: ELERIA *First name: ANNA
(department head, MS4 coordinator, consultant, etc.)
*Title: WATER RESOURCE PROJECT MANAGER
*Mailing address: 1410 ENERGY PARK DRIVE, SUITE 4
*City: SAINT PAUL *State: MN *Zip code: 55108
*Phone (including area code): 651-644-8888 *E-mail: anna@capitolregionwd.org

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

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

Verification

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

Certification (All fields are required)

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

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

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

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

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

Name: MARK DONEUX
(This document has been electronically signed)

Title: ADMINISTRATOR Date (mm/dd/yyyy): 12/30/2013

Mailing address: 1410 ENERGY PARK DRIVE, SUITE 4

City: SAINT PAUL State: MN Zip code: 55108

Phone (including area code): 651-644-8888 E-mail: mark@capitolregionwd.org

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

Stormwater Pollution Prevention Program Document

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

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

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Metro Watershed Partners - Coalition collaborates on stormwater education and outreach projects and hosts a stormwater education website	MCM 1 – Public Education
Blue Thumb – Partnership between organizations that promote the use of native plants, rain gardens, and shoreline restoration projects via its website, workshops, and guidance documents.	MCM 1 – Public Education
City of Saint Paul – Assists CRWD in minor maintenance and repairs to its storm sewer	MCM 6 – Pollution Prevention/Good Housekeeping
MN Conservation Corps – Assist CRWD with the maintenance of its BMPs	MCM 6 – Pollution Prevention/Good Housekeeping
Northland NEMO – Collaborative of organizations and partners in Minnesota and Wisconsin that works together to offer educational programming, provide resources, and create effective tools and opportunities to assist and enable local communities to make informed decisions regarding land use and water and natural resources.	MCM 1 – Public Education
University of Minnesota -- will lead a research study on barriers to stormwater management and conservation behaviors among CRWD citizens, 2014-15.	MCM 1 – Public Education
Como Lake Neighbor Network – will lead annual leaf cleanup among CRWD/Como Lake neighborhood residents.	MCM 6 – Pollution Prevention/Good Housekeeping
Saint Paul Division of Parks and Recreation cooperates with CRWD to present an annual Clean Water Award to recognize outstanding clean water landscapes as part of Blooming Saint Paul Awards program.	MCM 1 – Public Education

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

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

Illicit discharges

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

1. If **yes**:

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

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

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

Citation:

Direct link:

<http://www.capitolregionwd.org/wp-content/uploads/2012/09/4-18-12-CRWD-Final-Adopted-Rule3.pdf>

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

2. If no:

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

Construction site stormwater runoff control

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

1. If yes:

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

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

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

Citation:

Direct link:

<http://www.capitolregionwd.org/wp-content/uploads/2012/09/4-18-12-CRWD-Final-Adopted-Rule3.pdf>

- Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg.*

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

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

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

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

- 1. Best Management Practices (BMPs) to minimize erosion. Yes No
- 2. BMPs to minimize the discharge of sediment and other pollutants. Yes No
- 3. BMPs for dewatering activities. Yes No

- 4. Site inspections and records of rainfall events Yes No
- 5. BMP maintenance Yes No
- 6. Management of solid and hazardous wastes on each project site. Yes No
- 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. Yes No
- 8. Criteria for the use of temporary sediment basins. Yes No

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

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?
 Yes No

1. If **yes**:

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

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

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

Citation:

Direct link:

<http://www.capitolregionwd.org/wp-content/uploads/2012/09/4-18-12-CRWD-Final-Adopted-Rule3.pdf>

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

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

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. Yes No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: Yes No

- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
- 2) Stormwater discharges of Total Suspended Solids (TSS).
- 3) Stormwater discharges of Total Phosphorus (TP).

b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: Yes No

- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
- 2) Stormwater discharges of TSS.
- 3) Stormwater discharges of TP.

3. **Stormwater management limitations and exceptions:**

a. Limitations

1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: Yes No

- a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
- 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: Yes No
- a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
- 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. Yes No
4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
- a. Mitigation project areas are selected in the following order of preference: Yes No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
 - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Yes No
 - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. Yes No
 - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. Yes No
 - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. Yes No
 - f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). Yes No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. Yes No
 - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when Yes No

those responsibilities are legally transferred to another party.

- c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. Yes No

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

CRWD convenes a Joint Rules Technical Advisory Committee with Ramsey-Washington Metro Watershed District on an annual basis to discuss permitting rules and potential amendment. CRWD Rules include alternative compliance sequencing for sites that cannot achieve volume reduction through infiltration. The language does not prohibit infiltration in some of the listed scenarios, or address very specific conditions like karst, DWSMAs or infiltration rates above 8.3 inches per hour. CRWD commits to including these topics on future technical advisory committee agendas and updating rules as appropriate to maintain compliance in 2014-2015.

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

- A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? Yes No
1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
 2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

- B. Describe your ERPs:

CRWD has developed written site inspection and enforcement procedures for new development and redevelopment construction sites greater than one acre. CRWD's inspector ensures each permitted construction project is in compliance with the NPDES general permit and CRWD Rules. The inspection includes an evaluation of the SWPPP and all erosion and sediment control BMPs. Non-compliant issues are discussed directly with the site superintendent. If compliance is not achieved within the required timeframes, a formal report is prepared and provided to the site superintendent and compliance is required within 48 hours. If the issue remains or there are repeated non-compliance issues, CRWD has the jurisdictional authority to stop work at the site until the issues are resolved or to deduct inspection or correction costs from a surety submitted by the permittee.

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

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

CRWD manages its storm sewer system map and inventory in-house using GIS and BMP database. CRWD's map identifies the CRWD-owned storm sewer interceptor pipe only, which ranges from 5 to 12 feet in diameter, and not lateral storm sewer lines owned by other MS4s. The map also includes over 20 structural BMPs constructed and operated by CRWD in the Como Lake subwatershed.

CRWD has separate EXCEL databases for BMPs owned by CRWD, BMPs grant funded by CRWD, or BMP permitted projects. CRWD is developing a GIS-based database for all BMPs to track conditions, inspections, maintenance and costs of these BMPs.

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

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

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

- C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:
1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. Yes No
 2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. Yes No
- D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.
1. A unique identification (ID) number assigned by the permittee. Yes No
 2. A geographic coordinate. Yes No
 3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. Yes No

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

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

CRWD is attaching the completed pond inventory form for a constructed stormwater pond within its jurisdiction CRWD does not have any wetlands or lakes within its jurisdiction so they were not included in the inventory form.

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

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

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

A. MCM1: Public education and outreach

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

CRWD has developed an Education and Outreach Plan to guide its efforts in increasing public awareness of watershed issues and in promoting behaviors that will help solve water-related problems. The focus of the Plan is on stormwater runoff and water quality of CRWD water resources. CRWD is a highly urbanized, fully developed watershed with nearly quarter of a million residents from five different cities, Saint Paul, Roseville, Maplewood, Falcon Heights and Lauderdale. CRWD has conducted a baseline survey of its residents to assess the existing level of knowledge regarding basic watershed and stormwater concepts. CRWD is working to increase their understanding of these concepts through its outreach to schools, community groups, and residents and by partnering with other organizations that have similar outreach goals. In addition, CRWD is educating homeowners, municipal staff and contractors about landscape practices that reduce runoff volumes and phosphorus and sediment loads.

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

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

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

Established BMP categories	Measurable goals and timeframes
Education and Outreach Plan	Plan completed in 2009; Two-year plan completed for 2014/2015
Watershed Resident Survey	Baseline survey conducted 2009, Knowledge, Attitudes & Practices survey completed in 2011, Community Capacity Assessment planned for 2014-15.

Media Campaign	In partnership with Watershed Partners, billboard, radio and TV placements with clean water messages to total 1.2 million impressions annually.
Communications - Print	Six electronic/print newsletters per year, four annual email blasts to 1800 organizations and residents. CRWD also produces promotional materials, education brochures and posters that are made available at 12-15 annual community events.
Communications – Website	CRWD updates its website with stormwater and watershed-related information, provides clean water tips for homeowners, students and businesses. In 2014/2015, CRWD will upgrade the current website’s educational tools and update its content.
Social Media	CRWD provides updates of its work on Facebook on at least a weekly basis. To date, CRWD has 155 “friends” on Facebook. CRWD hopes to gain at least 25 new “friends” on a yearly basis.
Classroom and Field Education	CRWD has established partnerships with several schools in the District that includes sponsoring internships for 3-4 high school or college students annually. CRWD visits several schools each year and presents information about the watershed, stormwater runoff issues and ways the students can help. CRWD has targeted relationships with three district schools.
Stewardship Grant Program	CRWD encourages homeowners, schools and businesses to become stewards of local water resources by providing free landscape consultation and design services as well as cost-share grants. Each year, CRWD awards on average 30 grants. CRWD is currently considering new criteria for determining grant award amounts that will improve allocation of limited grant funds to projects with the greater water quality benefits.
Residential Workshops	CRWD hosts or supports 8-10 rain garden design and rain barrel construction workshops annually.
Municipal Training	Each year, CRWD sponsors winter maintenance training to the 100 drivers of the City of Saint Paul Maintenance snow plow fleet.
BMP categories to be implemented	Measurable goals and timeframes
Watershed /Landscape Game	In partnership with other watershed districts, CRWD will develop a landscape-based watershed education game for 10-1,000 players for the purpose of citizen engagement and education about CRWD water resources.
Como Curbside Cleanup	In partnership with local planning districts, CRWD will support fall leaf pick up events in Como Lake neighborhoods.
Grant Program Promotion and Focus	CRWD will focus grant promotion efforts to Southeast Asian communities in one or more geographic areas in the District
Green Line Initiatives	CRWD’s Artist in Residence has envisioned the “Hydropolis” initiative in the Green Line light rail corridor to raise awareness of citizens of their role in protecting local water quality and the actions and behaviors needed to help achieve it. CRWD will partner with Central High School and Green Line businesses to promote clean water practices.
Educational Displays	CRWD has developed three portable educational displays with clean water issues. CRWD anticipates using the displays at twenty annual community events.
Illicit Discharge Recognition and Reporting	Currently on CRWD website, citizens can report clean water problems including potential illicit discharges to CRWD staff. By the end of permit year 5, CRWD will conduct additional outreach on illicit discharge recognition and reporting using the newsletter article, an illicit discharge web page, four annual Facebook postings and a banner display with webpage information to be used at a minimum of ten public events.

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

Elizabeth Beckman, Education and Outreach Coordinator

B. MCM2: Public participation and involvement

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

In 1998, CRWD established a citizen's advisory committee (CAC) to advise and assist CRWD with organizational development, planning processes and program and project implementation. The CAC provides public input on CRWD's programs, projects and initiatives defined in our 10-year watershed management plan and SWPPP. On a monthly basis, the CAC meets to receive new information and periodic updates of CRWD's work and provide input and advice. Each year, CRWD staff present the SWPPP annual report and receive feedback from CAC members.

In conjunction with a Board meeting, CRWD holds a public meeting on the SWPPP annual report and offers the public an opportunity to comment on CRWD's stormwater management efforts. The public meeting is advertised on CRWD's website, Facebook page and Saint Paul Pioneer Press newspaper.

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

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

Established BMP categories	Measurable goals and timeframes
CRWD Citizen's Advisory Committee	Monthly meetings with a SWPPP presentation at its June meeting
Annual SWPPP Meeting	Held in conjunction with a CRWD Board meeting typically held in June
Public Meeting Notice	Public notice is published in Saint Paul Pioneer Press newspaper at least 30 days prior to meeting as well as on CRWD's website.
SWPPP Documents Access	The SWPPP document and annual reports and CRWD Rules are available at CRWD's office and on CRWD's website. The SWPPP annual report is made available at least 30 days prior to the SWPPP annual meeting.
Public Comments Consideration	CRWD provides a minimum of 30-day comment period on the SWPPP annual report. Comments can be provided both in writing and orally either at the public meeting or by calling CRWD.
BMP categories to be implemented	Measurable goals and timeframes

3. Do you have a process for receiving and documenting citizen input? Yes No

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

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

Anna Eleria, Water Resource Project Manager

C. MCM 3: Illicit discharge detection and elimination

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

CRWD has implemented an illicit discharge detection and elimination program that includes a map of the MS4 system, District rule for illicit discharges and connections, visual observations of illicit discharges during field work, and illicit discharge monitoring. We have developed procedures for notifying Saint Paul, other District cities, other MS4s, and/or MN Dept. of Public Safety of suspected illicit discharges as they occur. Tracking the sources and eliminating illicit discharges is primarily the responsibility of other MS4s as CRWD does not own the lateral pipes connected to our trunk line sewer system.

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

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

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

CRWD will identify priority areas likely to have illicit discharges at the end of Permit Year 1. CRWD will utilize GIS to identify land use areas with higher likelihood of illicit discharge, potential hotspot locations including underground stormwater tanks, previous illicit discharge locations, etc.

CRWD will also develop written procedures for responding to spills by the end of Year 1 of the Permit.

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

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

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

Established BMP categories	Measurable goals and timeframes
MS4 Map	Completed in first permit term; will be updated as needed
Regulatory Mechanism	Adopted Illicit Discharge and Connection Rule in 2012; will be reviewed annually as part of CRWD's annual rules review process
Monitoring of Suspected Illicit Discharges	CRWD monitors stormwater runoff year round in four major subwatersheds and from April to October in other additional subwatershed locations. During stormwater monitoring and other field activities, CRWD staff make observations and report suspected illicit discharges to the appropriate staff and/or agency.
Reporting of Illicit Discharges	CRWD has developed written procedures for reporting

	suspected illicit discharges to the City of Saint Paul, other District cities, other MS4 entities and/or MN Public Safety Officer.
Locating and Eliminating Source of Illicit Discharges	Since CRWD owns a storm sewer interceptor only and not lateral lines connected to the interceptor, locating and eliminating the source of the illicit discharge is mainly the responsibility of another MS4. CRWD follows the reporting procedures of illicit discharges.
BMP categories to be implemented	Measurable goals and timeframes
Priority Area Identification of Illicit Discharges	CRWD will identify priority areas likely to have illicit discharges at the end of Year 1 of the Permit. CRWD will utilize GIS to identify land use areas with higher likelihood of illicit discharge, potential hotspot locations including underground stormwater tanks, previous illicit discharge locations, etc.
Spill Response Procedures	CRWD will also develop written procedures for responding to spills by the end of Year 2 of the Permit.
Training of Illicit Discharge Recognition and Reporting	CRWD will conduct a training for the entire staff on the recognition and reporting of illicit discharges by the end of Permit Year 3. Training for Illicit discharge monitoring will be provided for water monitoring staff.

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? Yes No
- If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:
- As part of the development of the BMP database, CRWD is also creating an MS4 database that will be utilized for record keeping of IDDE program.*
5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:
- Anna Eleria, Water Resource Project Manager*

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:
- CRWD Rules require redevelopment projects that disturb one or more acres obtain a permit from CRWD. Permit applicants are required to develop an erosion and sediment control plan that meets the standards for MPCA's general permit for construction activity and those outlined in CRWD's erosion and sediment rule. CRWD reviews each project using the site plan review procedures and checklist. CRWD has also developed the schedule and procedures for conducting construction site inspections. Both CRWD staff and its engineering consultant conduct project site plan reviews. The construction site inspections are conducted by trained CRWD staff. For larger capital improvement projects where ESC inspections are conducted weekly, CRWD seeks the assistance of its engineering consultant to conduct and report on the inspections.*
2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? Yes No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R10001*? Yes No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? Yes No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? Yes No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? Yes No

- 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? Yes No
- 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? Yes No
- e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? Yes No
- f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? Yes No
- g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? Yes No

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

While CRWD documents and follows up each report of potential stormwater issue with site investigation, monitoring when appropriate, and contacting the appropriate responsible agency, CRWD does not have written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity from the public. CRWD will develop written procedures by the end of Permit Year 1.

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

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

Established BMP categories	Measurable goals and timeframes
Erosion and Sediment Control Rule	CRWD adopted this rule for development projects that disturb one acre or more in 2006. On an annual basis, CRWD evaluates all its rules to determine if any changes are needed.
Procedures for Site Plan Review	Permit applications and its supporting materials are reviewed using the written site plan review procedures and checklist to determine if the project is meeting CRWD requirements. The applications must be submitted at least 21 calendar days prior to a regularly scheduled Board meeting.
Procedures for Site Inspection and Enforcement	CRWD inspects permitted projects typically weekly and after rainfall of 0.25 inch. Larger projects are inspected more frequently up to once a week.
Procedures for Receipt of Reports of Non-Compliance	The public can make reports of erosion and sediment control or other stormwater related issues via CRWD's website, which has a link for reporting a problem to CRWD staff on the home page, or by calling or emailing CRWD.
Documentation of Site Plan Review Findings	CRWD has developed permit application reports that indicate the applicable CRWD rules for the project and the findings of the application review. It provides CRWD recommendation for Board action on the project (i.e., approve, table, reject) and the conditions associated with the action.
Documentation of Site Inspection Observations	CRWD has developed an erosion and sediment control report form that inspector(s) complete after an inspection is conducted. The form indicates whether or not the erosion and sediment control practices are in compliance and the corrective measures that must be taken to come into compliance.
BMP categories to be implemented	Measurable goals and timeframes
Documentation of Enforcement Actions/Responses for Projects of Non-Compliance	CRWD will create written procedures on when and how enforcement actions will be taken, and standard operating procedures to ensure consistent implementation by end of Permit Year 1.
Permitting Database	CRWD currently uses EXCEL to track permitted projects but is developing a GIS-based database for its permitting program that will include information about permitted projects including project name, location, area disturbed, project owner, stormwater

	related information, and inspection information. The database should be completed by early 2014.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:
Forrest Kelley, Regulatory and Construction Program Manager

E. MCM 5: Post-construction stormwater management

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

In 2006, CRWD's Board of Managers adopted rules that includes one for stormwater management on development projects that create one or more acres of land disturbance. Runoff rates for the proposed project cannot exceed existing runoff rates for the 2-year, 10-year, and 100-year critical storm events. Runoff volume shall be achieved onsite in the amount equivalent to the runoff generated from one inch rainfall over the impervious surfaces. CRWD established a permitting program to carry out the Rules and ensure the stormwater management standards are met. The program includes a permit application and site plan review process, construction site inspections, and a maintenance agreement that is attached to the property in perpetuity.

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

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

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

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

Established BMP categories	Measurable goals and timeframes
Post-Construction Stormwater Management Rule	Stormwater management rule adopted in 2006. Each year, CRWD and technical advisory committee evaluate the rule and determine if any changes are needed.
Procedures for Site Plan Review	Permit applications and its supporting materials are reviewed using the written site plan review procedures and checklist to determine if the project is meeting CRWD requirements. The applications must be submitted at least 21 calendar days prior to a regularly scheduled Board meeting.
Documentation of Site Plan Review Findings	CRWD has developed permit application reports that indicate the applicable CRWD rules for the project and the findings of the application review. It provides CRWD recommendation for Board action on the project (i.e., approve, table, reject) and the conditions associated with the action.

Procedures for Site Inspections	CRWD inspects permitted projects weekly and after rainfall of 0.25 inches. Larger projects are inspected more frequently.
Agreement for Long-Term BMP Maintenance	CRWD requires the permittee execute a maintenance agreement that is attached to the property and recorded in Ramsey County.
BMP categories to be implemented	Measurable goals and timeframes
Permitting Database	CRWD currently uses EXCEL to track permitted projects but is developing a GIS-based database for its permitting program that will include information about permitted projects including project name, location, area disturbed, project owner, stormwater related information, and inspection information. The database should be completed by early 2014.
Promotion of Green Infrastructure Practices	By the end of Permit Year 5, CRWD will provide information about green infrastructure practices on its website including definition, list and descriptions of the different practices and benefits of green infrastructure. We will also include examples of green infrastructure practices implemented by CRWD and others.

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

Forrest Kelley, Regulatory and Construction Program Manager

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

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

CRWD inspects and maintains its stormwater best management practices on a monthly basis and after major storms. CRWD has developed BMP maintenance protocols and standard operating procedures and updates them on an annual basis. CRWD also inspects and monitors stormwater runoff on a biweekly basis and after major storms at its MS4 outlet and two intermediate (upstream) locations. CRWD provides training for internal staff on stormwater BMP maintenance. In addition, CRWD sponsors annual training workshops for District city staff and private contractors working in the District on pollution prevention and good housekeeping measures including turf maintenance and winter road maintenance .

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? Yes No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:
4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

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

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

Established BMP categories	Measurable goals and timeframes
BMP Inspection and Maintenance Program	CRWD has established a BMP inspection and maintenance program for the nearly 20 CRWD-owned practices in the Como Lake subwatershed and Green Line Corridor. The BMPs and their pretreatment units are inspected on a monthly basis and after rain event greater than 0.5 inches to ensure they are

	functioning properly. Any necessary maintenance activities are also conducted during these inspections. The accumulated sediment and debris in the pretreatment units and infiltration trenches are vacuumed out twice a year.
BMP Inspection and Maintenance Protocols	As part of the BMP inspection and maintenance program, CRWD has developed written inspection and maintenance protocols that describes for each BMP, the inspection/maintenance schedule, tasks, equipment needed, and form to be completed. At the beginning of the year, CRWD staff evaluates the existing protocols and updates them as needed to incorporate additions or changes to sites, schedule, and tasks.
MS4 Outlet Inspection, Monitoring and Maintenance	CRWD inspects and monitors its MS4 outlet and two intermediate locations at least twice a month year round. The access manhole near the MS4 outlet has been repaired to provide safe access for staff.
Employee Training	CRWD hosts stormwater management related trainings for municipal staff in the District twice annually. Trainings topics include: municipal turf management that makes a limited environmental impact, clean water designs for residential landscape professionals and municipal winter street maintenance that limits use of chloride while maintaining public safety. Trainings are attended by a minimum of 100 municipal staff annually. Previous and anticipated future trainings include turf management, winter maintenance practices, stormwater BMP design/construction and illicit discharge detection and elimination.
Clean water information for residential and business sites	CRWD maintains information on its website for homeowners and business owners who want to keep water from running offsite and limit polluted stormwater runoff.
BMP categories to be implemented	Measurable goals and timeframes
BMP Database	CRWD currently uses EXCEL to track its BMPs but is developing a GIS-based database for its BMP program that will include project name, location, owner, stormwater performance information, and inspection information. The database should be completed by early 2014.

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

(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas?

8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? Yes No
 - b. Covers the requirements of the permit relevant to the duties of the employee? Yes No
 - c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? Yes No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? Yes No

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

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

Bob Fossum, Monitoring, Maintenance, and Research Division Program Manager

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

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? Yes No
- 1. If **no**, continue to section VII.
 - 2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

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

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

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? Yes No
- 1. If **no**, this section requires no further information.
 - 2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

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

VIII. Add any Additional Comments to Describe Your Program

TMDL Wasteload Allocation Excel Spreadsheet PART II.D.6.a.-e.

Copy and paste from the Master List MS4 TMDL Spreadsheet for your MS4 to the space below.

Attach this completed form with your SWPPP Document at the time of submittal. At a **minimum**, provide all of the information "*" items (TMDL Project Name, Type of WLA, Numeric WLA, Unit, Flow Condition, and Pollutant of Concern).

Permittee name	Preferred ID	TMDL project name*	Waterbody ID	Type of WLA*	Numeric WLA*	Unit*	Percent reduction	Flow condition*	Waterbody name	Pollutant of concern*	Date approved
Capitol Region Watershed District	MS400206	Como Lake: Excess Nutrients TMDL	62-0055-00	Categorical	0.68	lbs/day	60%	N/A	Como Lake	Phosphorus	12/23/2010

Compliance Schedule PART II.D.6.f.-g.

Is your MS4 currently meeting its WLA for any approved TMDLs?

- : NO (Complete Table 1, Strategies for continued BMP implementation beyond the term of this permit, and Table 2 below)
 YES (Provide the following information below)

Go to:

[Table 1](#)

Go to:

[Strategies...](#)

Go to:

[Table 2](#)

If YES, indicate the WLAs (may be grouped by TMDL Project) you believe are reasonably being met. For each WLA, list the implemented BMPs and provide a narrative strategy for the long-term continuation of meeting each WLA. PART II.D.6.g.(1)-(2)

Table 1

Fill in the following table with your Interim Milestones, BMP IDs, and Implementation Dates. Replace "TMDL Project Name & Pollutant" Columns with each TMDL Project Name and the corresponding pollutant. Then put an "X" in the boxes for the TMDL that corresponds with each BMP. PART II.D.6.f.(1)-(2)

NOTE:

It is recommended to assign each Interim Milestone (BMP) a BMP ID. You will be required to report on the status of each Interim Milestone and include a BMP ID for all structural BMPs as part of the MS4 Annual Report (see Part III.E. numbers at the time of application may be useful in tracking implementation efforts. If a pond that will be included in the pond inventory (Part III.C.2.) is to be applied toward a WLA, use the same ID for both the pond inventory and TI BMPs are not required to have an ID, but it may be useful to assign it an ID for internal MS4 recordkeeping.

MPCA recommends the Implementation Dates align with the submittal of MS4 Annual Reports. Dates selected may not reflect the actual date a BMP is implemented, but shall indicate a BMP will be implemented on that date or before.

Interim Milestone (Best Management Practice)	BMP ID	Implementation Date	Como Lake: Excess Nutrients TMDL - Phosphorus	TMDL Project Name & Pollutant2	TMDL Project Name & Pollutant3
Arlington-Pascal Stormwater Improvement Project (Rain Gardens, Infiltration Trenches, UG, Stormwater Pond) - Joint Partnership	APSI-0001	6/30/2010	x		
Gottfried's Pit Stormwater Improvement Project - Joint Partnership	GPSI - 0002	6/30/2012	x		
Victoria Street Reconstruction Project (Rain Garden) - Saint Paul	VSRG - 0003	6/30/2010	x		
Como Zoo Polar Bear Exhibit Infiltration Basin - Saint Paul	CZIB - 0004	6/30/2008	x		
Como Zoo Gorilla Exhibit Underground Infiltration - Saint Paul	CZUI - 0005	6/30/2012	x		
Como Pool Stormwater Improvement Project (Raingardens) - Saint Paul	CPRG - 0006	6/30/2011	x		
Roselawn Avenue Street Reconstruction Project (Raingardens) - Roseville	RLRG - 0007	6/30/2010	x		
Rainbow Foods Underground Infiltration System	RGUI - 0008	6/30/2009	x		
Walgreens Underground Infiltration System	WGUI - 0009	6/30/2013	x		
Falcon Heights Street Reconstruction Stormwater Project	FHSW - 0010	6/30/2014	x		
Curtiss Pond Stormwater Improvements - Falcon Heights	CPSI - 0011	6/30/2015	x		
Investigate opportunities to provide volume reduction in the drainage area to Gottfried's Pit to alleviate flooding at Larpenteur Ave. - Roseville	RFLS - 0012	6/30/2018	x		
Develop education for property owners on how to manage snow removal to minimize water quality and quantity concerns - Roseville	RSRE - 0013	6/30/2015	x		
Review and update as necessary city design standards for water quality treatment, rate control, and volume reduction. Update the design standards for design events when the NWS publishes updated rainfall frequency estimates - Roseville	RSTR - 0014	6/30/2015	x		
Investigate opportunities to collaborate on developing unique public education opportunities such as a stormwater geocache - Roseville	RPEO - 0015	6/30/2016	x		
Incorporate stormwater BMPs in city parks concurrent with the parks renewal program - Roseville	RPSW - 0016	6/30/2016	x		

Expand the City's website to include the City's stormwater management plan, identify citizen involvement opportunities and provide additional stormwater management resources - Roseville	RWEB - 0017	6/30/2014	x		
Como Park Spring Cleanup - Saint Paul	CPSC -0018	Ongoing	x		
Neighborhood leaf litter cleanups - Saint Paul	LLCU - 0019	Ongoing	x		
Identify drainage improvements or potential BMPs in 5-year major road maintenance program - Ramsey County	Maint_2014-2018	Annually	x		
Identify permit requirements and BMPs for projects in 5-year Transportation Improvement Program - Ramsey County	TIP_2014-2018	Annually	x		
Perform maintenance dredging of Como Golf Course primary and secondary ponds - Ramsey County	Como_PondMaint_2014	9/30/2014	x		
Operate Como Lake aeration system to maintain fish population - Ramsey County	Aeration_Como	Ongoing	x		
Street sweeping - Saint Paul, Roseville, Falcon Heights, Ramsey County	Sweeping	Ongoing	x		
Catch basin cleaning - Saint Paul, Roseville, Falcon Heights, Ramsey County, CRWD	CB_Cleaning	Ongoing	x		
Stormwater BMP maintenance - Saint Paul, Roseville, Falcon Heights, Ramsey County, CRWD	BMP_Maintenance	Ongoing	x		
Public stormwater education - Saint Paul, Roseville, Falcon Heights, Ramsey County, CRWD	Public_Education	Ongoing	x		
Municipal stormwater education on good housekeeping and pollution prevention measures - Saint Paul, Roseville, Falcon Heights, Ramsey County, CRWD	Muni_Education	Ongoing	x		

Strategies for continued BMP implementation beyond the term of this permit. PART II.D.6.f.(3)

Beyond the term of this permit, CRWD, Saint Paul, Roseville, Falcon Heights, and Ramsey County will continue to investigate opportunities individually and jointly for implementing and promoting stormwater BMPs to achieve the WLA for Como Lake TMDL. The partners will continue to consider utilizing green infrastructure practices instead of traditional stormwater management practices to reduce phosphorus loading to Como Lake. In addition, grants and other funding sources will be pursued to aid in the planning, design, and construction of stormwater BMPs. Existing stormwater management regulations will be evaluated periodically for assurance that NPDES MS4 permit requirements are being met. The partners will also monitor and/or conduct modeling of phosphorus loading to help determine the target reduction areas and monitor BMP effectiveness to help guide future selection of BMPs.

**Table 2
Target dates the applicable WLA(s) will be achieved. PART II.D.6.f.(4)**

TMDL Project	Target Date to Achieve WLA
Como Lake: Excess Nutrients TMDL	2043

), so including those ID
MDL tracking. Non-structural

e for that reporting year.

TMDL Project Name & Pollutant4	TMDL Project Name & Pollutant5	TMDL Project Name & Pollutant6	TMDL Project Name & Pollutant7	TMDL Project Name & Pollutant8	TMDL Project Name & Pollutant9	TMDL Project Name & Pollutant10	TMDL Project Name & Pollutant11	TMDL Project Name & Pollutant12	TMDL Project Name & Pollutant13	TMDL Project Name & Pollutant14

TMDL Project Name & Pollutant15	TMDL Project Name & Pollutant16	TMDL Project Name & Pollutant17	TMDL Project Name & Pollutant18	TMDL Project Name & Pollutant19	TMDL Project Name & Pollutant20	TMDL Project Name & Pollutant21	TMDL Project Name & Pollutant22	TMDL Project Name & Pollutant23

MS4 Stormwater Pond Inventory Form

Municipal Separate Storm Sewer Systems (MS4) Program

Doc Type: Plans/Specifications/Maps

Name of MS4 Permittee	Date	Water Body ID #	Water Body Type	Water Body Common Name	Waterbody Location			Outfall Location			Year in Service	Ownership	Maintenance Responsibility & Authority	Size	Water Body Function						# of Outlets	# of Inlets						
					Coordinate System	X Coord.	Y Coord.	Outfall ID #	X Coord.	Y Coord.					Water Quality	Flow Control	Flood Control	Utilization/Volume Control	No Control Function	Natural Water Body			Unknown					
Capitol Region Watershed District	11/21/2013	APSI-0001-PD	Constructed Pond	Como Park Regional Pond	UTM	488010.1	4981487	PD-Out	4880249	4981406	2007	Watershed District	Watershed District	2.5	1	1	1	2								1	1	

Name of MS4 Permittee	Date	Water Body ID #	Water Body Type	Water Body Common Name	Waterbody Location			Outfall Location			Year in Service	Ownership	Maintenance Responsibility & Authority	Size	Water Body Function						# of Outlets	# of Inlets					
					Coordinate System	X Coord.	Y Coord.	Outfall ID #	X Coord.	Y Coord.					Water Quality	Rate Control	Flood Control	Utilization/Volume Control	No. Control Function	Natural Water Body			Unknown				



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MS4 Permit Reference— Part V.G.4.f.

Procedures for Site Inspection and Enforcement of Control Measures:

1. Job title and department of individual(s) responsible for inspections:

The following employees conduct regular erosion and sediment control inspections on permitted construction sites in the Capitol Region Watershed District (CRWD):

Forrest Kelley, P.E.
Regulatory and Construction Program Manager
Capitol Region Watershed District

Britta Suppes
Water Resource Technician
Capitol Region Watershed District

Both employees are trained and certified to conduct erosion and sediment control inspections. Both employees are responsible for the inspection of construction sites, reporting of non-compliant items observed during the inspection, and enforcement of control measures to correct non-compliant items.

2. Inspection forms or checklist(s) used:

CRWD conducts erosion and sediment control inspections on permitted construction sites to ensure each construction site is in compliance with the NPDES General Permit and District Rules. Construction site inspections include an evaluation of the SWPPP and all erosion and sediment control BMPs. CRWD also evaluates the construction of stormwater BMPs on permitted sites to ensure they are being installed correctly for proper function and longevity. The following list details the process of a general erosion and sediment control inspection for CRWD permitted construction sites:

A. *Scheduling of a Site Visit:*

- a. Permitted construction site inspections are generally scheduled weekly to bi-monthly
- b. Sites visits can be scheduled as-needed in response to a variety of reasons, e.g. increased site activity, the need for frequent or additional site inspections due to non-compliant items, the enforcement of control measures, assurance of BMP installation, or consultation with the site superintendent or permittee

B. *Construction Site Visit Protocol:*

- a. The construction site inspector enters the construction site and meets with the site superintendent to ensure they are aware of the inspector's presence onsite. The site superintendent is welcomed to join the inspector on the site inspection. If the site superintendent chooses to not attend the site inspection, the inspector will discuss the



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items of non-compliance with the site superintendent before leaving the site so they are fully aware of items requiring control measures.

- b. The inspector conducts the construction site inspection by walking the entire construction site and making observations on the state of:
 - i. Perimeter Control
 - ii. Inlet Protection
 - iii. Construction Entrance
 - iv. Sediment Tracking
 - v. Soil Stabilization
 - vi. Concrete Mixing and Washout
 - vii. Dewatering Activities
 - viii. Other (e.g. Secondary Fuel Containment, Equipment Storage)
- c. During the inspection, the inspector records notes and takes pictures of both compliant and non-compliant items.
- d. If a stormwater BMP facility (e.g. stormwater infiltration pipe gallery or stormwater infiltration pond) is being installed while the inspector is onsite, the inspector will ensure it is being constructed correctly, including:
 - i. Reduced soil compaction by heavy equipment
 - ii. Proper placement of construction materials such as sand, gravel, rock, and fabric
 - iii. Assurance that all stormwater inlets to the facility are offline during construction
 - iv. Following construction, assurance that the BMP is properly protected until it is ready to be online and receiving stormwater
- e. Non-compliant items are discussed directly with the site superintendent to ensure that the appropriate control measures are completed within 24 hours of discovery
- f. Upon returning to the office, the site inspector documents the inspection observations and notes all items of non-compliance in a formal report (Figure 1). The formal report is provided to the site superintendent, project permittee, and selected City staff via email.
- g. All non-compliant items are expected to be addressed within 24 hours of discovery
- h. The site inspector will follow-up with a site visit within a week to ensure the items of non-compliance have been addressed.
- i. If items of non-compliance are not addressed or repeatedly in a state of non-compliance, CRWD has the jurisdictional authority to stop work at the site until the items are complete or fine the permittee by deducting dollars through the surety deposit

3. Example of enforcement action used:

When erosion and sediment control measures are identified as being non-compliant, action is required to correct the control measure within 24 hours of discovery. If control measures are not corrected or in a repeated state of non-compliance, CRWD has jurisdictional authority to stop work at the site or fine the permittee.

An example of enforcement occurred in Fall 2011 when permit 10-003 CCLRT was in repeated non-compliance and unresponsiveness to completing requested control measures. A letter was sent to the permittee from the Ramsey County Attorney's Office requesting a deadline for compliance or a stop work order would be issued.



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EROSION & SEDIMENT CONTROL INSPECTION REPORT

This project was issued a permit by the Capitol Region Watershed District requiring erosion and sediment control measures be installed and maintained as specified in the NPDES General Permit so as to prevent adverse impacts to adjacent stormwater facilities and water resources.

PERMIT: xx-xxx

LOCATION:

PRIMARY CONTACT(S):

INSPECTION DATE: xx/xx/xxxx

Any items found to be in non-compliance shall be promptly corrected in order to prevent enforcement action.

PERIMETER CONTROL

Compliant Non-Compliant N/A

Comment: _____

INLET PROTECTION

Compliant Non-Compliant N/A

Comment: _____

STABILIZED CONSTRUCTION ENTRANCE

Compliant Non-Compliant N/A

Comment: _____

SEDIMENT TRACKING

Compliant Non-Compliant N/A

Comment: _____

SOIL STABILIZATION

Compliant Non-Compliant N/A

Comment: _____

DESIGNATED CONCRETE WASHOUT AREA

Compliant Non-Compliant N/A

Comment: _____

DEWATERING ACTIVITIES

Compliant Non-Compliant N/A

Comment: _____

OTHER

Compliant Non-Compliant N/A

Comment: _____

Figure 1: Erosion and Sediment Control Construction Site Inspection Form