

Storm Water Management Program

The City of Mitchell has developed a Storm Water Management Program based on the Department of Environment and Natural Resources (DENR) requirements for Municipal Separate Storm Sewer System (MS4) operators.

- 1) Public education and outreach;
- 2) Public participation/involvement;
- 3) Illicit discharge detection and elimination;
- 4) Construction site storm water runoff control;
- 5) Post-construction storm water management; and,
- 6) Pollution prevention/good housekeeping for municipal operations.

1. Public Education and Outreach on Stormwater Impacts

A. Best Management Practices (BMPs) to be Implemented

According to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems issued by the Department of Environment and Natural Resources (DENR), to satisfy this minimum control measure, the Municipal Separate Storm Sewer System (MS4) operator must implement public education activities, which include the following:

- Distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges and the steps the public can take to reduce pollutants in storm water runoff.
- Inform businesses and the general public of impacts associated with illegal discharges and improper disposal of waste.

The key goal of the educational program is to raise stormwater quality impact awareness. Many opportunities within the City of Mitchell exist to accomplish this goal. Below are the proposed program elements that the City shall implement as part of program development. These are the appropriate best management practices (BMPs) that the City has proposed to comply with the Public Education and Outreach on Stormwater Impacts minimum control measure.

1. The City shall develop a working group for a stormwater public education program. The working group could be comprised of City personnel or it could branch out to include input from the general public, local business community, engineers, developers, contractors, and other community stakeholders. The focus of the working group would be to develop the public education program.
2. The City shall develop/utilize several brochures to communicate stormwater quality impacts to the community. A brochure for the business community use and a second for the general public use will be available at the City Hall. A third shall be developed to communicate information regarding the Illicit Discharge Program. Opportunities shall be evaluated to combine stormwater quality impacts and source water protection information into a single brochure. Brochure topics could include pet waste management, illicit discharge reporting, household hazardous waste recycling, typical

industrial good housekeeping BMPs, and stormwater relationship to drinking water sources. Brochures are available at the City Hall.

3. The City shall establish a storm inlet stenciling program. The stenciling program might be conducted by City staff or local volunteer organizations, such as the Boy Scouts or Girl Scouts, with materials and oversight provided by the City. The City will need to develop a system to track how many inlets are stenciled. Some inlets will require periodic re-stenciling.
4. The City shall add NPDES information to the City's website in October 2014.
5. The City shall evaluate the opportunity to provide additional signage at creek and stream road crossings specifically identifying local bodies of water. Additional signage that labels local resources can raise public awareness of the presence of local creeks and streams.
6. The City shall evaluate the opportunity to post electronic versions of informational brochures on the City's web site or to create a web page with a stormwater focus. This could involve the inclusion of pages presenting information on Lake Mitchell and the City of Mitchell's Phase II programs, and links to stormwater quality information available elsewhere on the Internet, such as USEPA's "surf your watershed" site (<http://www.epa.gov/surf/>).

B. Measurable Goals/Schedule

The following table provides the implementation schedule and measurable goals for each BMP to meet Phase II program requirements for Public Education and Outreach on Stormwater Impacts.

Target Date (End of Year)	Activity	Measurement
Year 1	Conduct brainstorming meetings within the City to develop acceptable approaches to the public education program.	Number of brainstorming meetings conducted; number of potential solutions generated.
	Determine which local organizations the City could potentially partner with to deliver public education and outreach services.	List of organizations contacted and potential activities.
	Obtain/develop educational stormwater brochures and begin to distribute brochures at the City Hall.	Brochure is available at City Hall.
	Add a NPDES section to the City's website.	Website links active.
Year 2	Evaluate the development of a partnership with Mitchell Public Schools, additional creek signage, and a City stormwater website. Select which of these elements to include in a final educational program.	A final list of Public Education program elements.
	Maintain NPDES section of City's website.	Monitor website hits.
	Continue to distribute brochures.	Number of brochures distributed.
Year 3	Begin a stenciling program.	Number of inlets stenciled.
	If adopted, begin a public school education program.	School education program evaluation.
	If adopted, begin posting signs.	Number of signs posted.
	Maintain NPDES section of City's website.	Monitor website hits.
	Continue to distribute brochures and update website.	Number of brochures distributed and website hits.
Year 4	Maintain NPDES section of City's website.	Monitor website hits.
	Continue other elements of program.	Number of inlets stenciled, signs posted, and brochures distributed.
Year 5	Continue program and evaluate overall program effectiveness.	List of partnership activities; number of inlets stenciled, signs posted, and brochures distributed; evaluation of overall program.

C. Rationale

The City conducted an assessment to compare current City programs to the requirements of the Phase II regulations. The development of the BMPs and measurable goals took the following into account.

With respect to overall water quality, the City has in the past implemented various public education and outreach activities, such as the distribution of brochures detailing municipal activities. Additional outreach activities are described below that address water quality impacts of stormwater runoff as required by Phase II regulations.

Previous and ongoing public education and outreach activities conducted by the City include the distribution of educational brochures related to the Lake Mitchell and Firesteel Creek Restoration Project, the siting of a new landfill, the City snow removal policy, and Water Department Consumer Confidence Reports. In addition to the distribution of these brochures and reports, City staff have occasionally appeared before civic groups such as the Lions and Kiwanis clubs, and spoken about the effects of municipal and private activities on the environment, such as pesticide, herbicide, and fertilizer application. The local newspaper, *The Daily Republic*, covers local issues and runs a regular feature called "We're Glad You Asked," which answers questions local citizens have about municipal operations. The City has also purchased local radio advertisements in the past to disseminate information that it has deemed especially important. It is anticipated that the above activities that have been completed yearly to maintain the City's responsible stewardship of the environment will continue to occur and will be documented as part of the Public Education BMP.

Because Lake Mitchell provides the City's drinking water supply as well as water for recreational activities, there is significant community interest in Lake Mitchell water quality. Two separate community organizations, the Lake Development Committee and the Firesteel Creek and Lake Mitchell Improvement Association, have been formed to address lake water quality issues. The Lake Mitchell Development Committee consists of a board of private citizens and public officials appointed by the mayor. The Firesteel Creek and Lake Mitchell Improvement Association is a non-profit 501 (c)(3) organization composed of members of the Lake Development committee. These groups have been actively involved with the Lake Mitchell and Firesteel Creek Restoration project, ongoing Lake Mitchell water quality monitoring, and development in the watershed. While these groups have not conducted many public education activities in the past, the potential exists for the City to form a partnership with them to develop a public education program that addresses the water quality impacts of stormwater runoff.

The City Beautification Committee consists of City staff and members of the public. This committee discusses various issues, such as nuisance properties, and it educates the public on the proper disposal of leaf, yard, and other waste. This committee was also involved in a project that involved bank stabilization of a local water body. This group could be valuable to include in a stormwater runoff public education program.

The Davison Conservation District publishes the Firesteel Creek newsletter. The District serves all of Davison County, including the City of Mitchell. The District has experience with water quality public education issues, such as the Lake Mitchell and Firesteel Creek Restoration project, and it may also be a potential partner for the City as it develops a stormwater runoff public education program.

The City provides an Industrial Pretreatment Program operated by the Utilities and Wastewater Division of Public Works. This program does not currently provide information to industry regarding stormwater practices, but the Utilities and Wastewater Division could provide stormwater quality educational information for industry along with the information it presently provides regarding spill response and industrial pre-treatment.

The BMPs and measurable goals selected are ones that build upon these existing activities to develop a program that meets the requirements of the Phase II regulations. The City shall draw upon these existing organizations and contacts to develop a working group for a stormwater public education program. The brochures developed shall consider the broader City stormwater quality issues such as drinking water quality. Dissemination of educational information and brochures will occur at the City Hall.

D. Responsibility

The following person or a successor shall be responsible for implementing and/ or coordinating each component of the Stormwater Management Program:

Public Works Director
612 N Main St
Mitchell SD 57301
605-995-8433

2. Public Involvement/Participation

A. Best Management Practices (BMPs) to be Implemented

According to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems issued by the Department of Environment and Natural Resources (DENR), to satisfy this minimum control measure, the Municipal Separate Storm Sewer System (MS4) operator must implement public education activities, which include the following:

- Encourage public participation by reaching out to community groups and discussing the NPDES program at Public Meetings.
- Comply with any applicable state and local public notice requirements using the City's current public notice protocols.
- Document efforts to involve the public and ensure that members of the community were given opportunities to be involved.
- Discuss the MS4 program during a public meeting and explain the MS4 program.

The key goal of the public involvement/ participation program is to ensure that valuable input and assistance in the development of the components of the MS4 Stormwater Management Program. The City currently implements the following measure to comply with applicable state and local public notice requirements using an effective mechanism for reaching the public:

All changes to City ordinances in the City of Mitchell need to be presented and approved by the City Council. As part of this process, the City follows a public notice procedure. Citizens are given the opportunity to provide feedback on local government programs to the City Council.

To comply with this minimum control requirement, the City shall, in addition to including minimum control measure program development on the agenda of City Council meetings and seek additional community involvement from a citizen group, workgroups, and committees for implementation of the Phase II stormwater program. Involving the Lake Development Committee in the development of the minimum control measure programs is one such option. The City will continue to coordinate with school and service groups to clean parks and ditches throughout the City on an annual basis. The City distributes vests and information to the volunteers and provides direction on what can safely be picked up by the volunteers. Coordination with work groups and citizen groups will be documented for the SWMP.

B. Measurable Goals/Schedule

The following table provides the implementation schedule and measurable goals for each BMP to meet Phase II program requirements for Public Involvement/ Participation.

Target Date (End of Year)	Activity	Measurement
Year 1	Approach the Lake Development Committee to develop a strategy for encouraging public participation in the program.	Public Involvement Strategy.
	Discuss the MS4 program at a Public Meeting at least once a year.	Discussion documented in meeting minutes.
	Coordinate with school and service groups to clean parks and ditches throughout the City on an annual basis.	Document cleaning activities.
Year 2	Implement strategy developed with the Lake Development Committee.	Document changes in public participation.
	Discuss the MS4 program at a Public Meeting at least once a year.	Discussion documented in meeting minutes.
	Coordinate with school and service groups to clean parks and ditches throughout the City on an annual basis.	Document cleaning activities.
Year 3	Maintain involvement developed with the Lake Development Committee.	Document changes in public participation.
	Discuss the MS4 program at a Public Meeting at least once a year.	Discussion documented in meeting minutes.
	Coordinate with school and service groups to clean parks and ditches throughout the City on an annual basis.	Document cleaning activities.
Year 4	Maintain involvement developed with the Lake Development Committee.	Document changes in public participation.
	Discuss the MS4 program at a Public Meeting at least once a year.	Discussion documented in meeting minutes.
	Coordinate with school and service groups to clean parks and ditches throughout the City on an annual basis.	Document cleaning activities.
Year 5	Maintain prior year activities and evaluate the Phase II public involvement program.	Document and evaluate program.

C. Rationale

While the present program meets the minimum requirements, the City desires to expand the public involvement process through the implementation of the activities described above. The City recognizes the value of the public participation process and will work to involve the public in additional activities that improve the quality of stormwater and the environment.

D. Responsibility

The following person or a successor shall be responsible for implementing and/ or coordinating each component of the Stormwater Management Program:

Public Works Director
612 N Main St
Mitchell SD 57301
605-995-8433

3. Illicit Discharge Detection and Elimination

A. Best Management Practices (BMPs) to be Implemented

According to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems issued by the Department of Environment and Natural Resources (DENR), to satisfy this minimum control measure, the Municipal Separate Storm Sewer System (MS4) operator must:

- Develop, if not already completed, a storm sewer system map showing the location of all municipal storm sewer outfalls and the names and location of all waters of the state that receive discharges from those outfalls.
- To the extent allowable under state or local law, effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges into the MS4 system and implement appropriate enforcement procedures and actions.
- Develop and implement a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping into the system.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

The key goal of the illicit discharge detection and elimination program is to ensure that proactive measures are in place to prevent illicit discharges and address illicit discharges when they occur. Below are the proposed program elements that the City shall implement as part of the program development. These are the appropriate best management practices (BMPs) that the City has proposed to comply with the Illicit Discharge Detection and Elimination minimum control measure.

1. Each creek and drainage conveyance ditch, which meets the criteria in the South Dakota Phase II manual of State waters, shall be walked to verify the location and size of all City outfalls, and the City storm sewer map shall be updated accordingly. A unique designation shall be provided to each outfall.
2. The City shall describe areas that historically have had dry weather flows from springs, sump pumps, and other water sources. City staff will be aware of which dry weather flows are acceptable and which will need to be addressed by the Illicit Discharge Detection and Elimination Program.
3. A public education brochure shall be obtained/developed that focuses upon educating the public as to what illicit discharges are, how they can be prevented, and how citizens can report them. This effort will be part of both the Public Education Program and this program.
4. The City shall refine and document its Illicit Discharge Detection and Elimination Program. The program shall include the three minimum requirements: procedures for locating priority areas; tracing the source of an illicit discharge; and removing the source of the discharge. To develop a program, the City shall determine which areas may have the highest numbers of illicit discharges to prioritize screening efforts; develop and train staff in outfall field screening procedures; and determine who shall be responsible for conducting the tasks of the program. The City plans on adopting the attached Illicit Discharge (IDDE) ordinance in October 2014.
5. The City shall evaluate spill prevention and response, sanitary sewer inspections, and household

hazardous waste collection programs as components of the illicit discharge minimum measure. These are all measures which may be employed to prevent non-stormwater discharges from entering the MS4 system. The City already has portions of these processes in place.

B. Measurable Goals/Schedule

The following table provides the implementation schedule and measurable goals for each BMP to meet Phase II program requirements for Illicit Discharge Detection and Elimination.

Target Date (End of Year)	Activity	Measurement
Year 1	Utilize the existing outfall map and begin screening and locating outfalls.	Number of outfalls located; list of outfalls with dry weather flow.
	Compose and distribute an illicit discharge brochure.	Brochures available at City Hall, the number distributed will be tracked.
	Adopt IDDE ordinance and implement IDDE program.	Ordinance is enforceable.
Year 2	Complete screening and locating outfalls.	Number of outfalls located; list of outfalls with dry weather flow.
	The outfall map will be updated yearly and as development occurs.	Updated map.
	Continue illicit discharge detection and elimination program.	Illicit discharge program activity documentation.
Year 3	Continue illicit discharge detection and elimination program.	Illicit discharge program activity documentation.
Year 4	Continue illicit discharge detection and elimination program.	Illicit discharge program activity documentation.
Year 5	Continue illicit discharge detection and elimination program.	Illicit discharge program activity documentation.

C. Rationale

The City conducted an assessment to compare current City programs to the requirements of the Phase II regulations. The development of the BMPs and measurable goals took the following into account.

The City currently implements various programs that may be components of the Illicit Discharge Detection and Elimination Program. The following discussion compares the current City programs to each requirement of the Program.

Develop, if not already completed, a storm sewer system map showing the location of all municipal storm sewer outfalls and the names and location of all waters of the state that receive discharges from those outfalls.

The City of Mitchell has a detailed map that identifies all storm sewer pipes in the system. Outfalls to receiving streams have been mapped and are currently being numbered to ensure accurate tracking of the outfalls in the future. Phase II regulations require the development of a list of outfalls and a map of outfall locations. This includes outfalls that are open channel ditches flowing into water bodies in addition to structural outfalls. Conducting the streamwalks will identify outfall locations and numbering the outfalls will allow City personnel to easily locate specific outfalls.

To the extent allowable under state or local law, effectively prohibit, through ordinance or other regulation; mechanism, non-stormwater discharges into the MS4 system and implement appropriate enforcement procedures and actions.

The City plans on adopting the attached Illicit Discharge (IDDE) ordinance in October 2014. The ordinance includes enforcement mechanisms for illicit discharges including fines and administrative actions.

Develop and implement a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping into the system.

The City responds to reports of problems related to the MS4 and the sanitary sewer system, including illicit discharges. Investigation of the sources of these problems and monitoring of the storm sewer system is performed on an as-needed basis. The Public Safety Department and Public Works Department coordinate with each other to properly handle reports of spills, illicit discharges, or other related problems. Phase II regulations require that a plan be developed to detect and address non-stormwater discharges. This plan must include locating priority areas likely to have illicit discharges, procedures for tracing the source of the discharge, and procedures for removing the source of the discharge. The City has an outfall prioritization plan for investigating the City's outfall and has begun the monitoring and documenting the outfalls within the City. The Public Works Department has responded when problems have been reported in the past. The City will enforce the new IDDE ordinance upon adoption by the City.

Phase II regulations and guidance also encourage addressing other potential illicit discharges into the MS4 system. These practices typically focus upon illicit discharge prevention as opposed to detection.

The following elements shall be evaluated for inclusion as part of a plan to detect and address non-stormwater discharges. These elements include:

- Spill prevention and response program
- Sanitary sewer inspection program
- Household hazardous waste program

Spill Prevention and Response Program

The Public Safety Department and Public Works Department coordinate with each other to properly handle reports of spills, illicit discharges, or other related problems. Reports of spills are generally given to the Public Safety Department, which handles the initial response. If the spill is minor and cleanup could be handled by the Street and Sanitation Division of the Public Works Department, Street Division personnel are contacted and conduct the cleanup. If the spill is large or involves hazardous material, trained Public Safety Department personnel conduct the cleanup in conjunction with Davison County Emergency Management. The current City program meets the standards of this program as described in the regulations and documentation of the program has been distributed and reviewed with City staff.

Sanitary Sewer Inspection Program

Sanitary sewer seepage into the storm sewer system can be a source of illicit discharge. The City feels that there is low potential of this type of illicit discharge in Mitchell, and provides relatively little inspection to detect this. When development occurs in older areas of the City, the City documents and inspects the project to ensure that sanitary sewer connections are made to the sanitary sewer and not to the storm sewer. The City uses a closed circuit television (CCTV) inspection of the sanitary and/or storm sewers to accomplish this. The City performs sewer inspections, by separating the city into quadrants and inspecting 25% of the City on a yearly basis. The CCTV inspections are completed on an as needed basis. The current City program meets the standards of this suggested program as described in Phase II regulations. Upon visiting all outfalls shown on the City outfall map and documenting each outfall, the City will be able to evaluate if additional sanitary sewer inspection beyond its current program is warranted.

Household Hazardous Waste Program

Removing household hazardous waste through a collection program can help to prevent discharge, leakage, or dumping to the MS4 system. Household hazardous waste is accepted in the City landfill, and residents are instructed to include such waste with their general household waste. There is a Cleanup Week that occurs once a year that is discussed at public meetings and noted on the City's website, during which the City encourages its residents to dispose of household wastes, including household hazardous waste. There is a free City leaf and yard waste disposal program. The current City program meets the standards of this suggested program as described in Phase II regulations.

Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

The regulations require that the City distribute information on illicit discharges and the proper disposal of waste to the general public, businesses, and City employees. This shall be done as part of the public education program and also noted in the illicit discharge program. Brochures are available at City Hall and information on pollutants will also be documented on the City's website.

The following categories of non-stormwater discharges or flows (i.e., illicit discharges) are addressed in the IDDE ordinance and have been determined not to be significant contributors of pollutants to the small MS4:

- Water line flushing – exempt in IDDE ordinance
- Landscape irrigation – exempt in IDDE ordinance
- Diverted stream flows – exempt in IDDE ordinance
- Rising groundwater – exempt in IDDE ordinance
- Uncontaminated groundwater infiltration to storm drains (as defined in 40 CFR 35.2005[20]) – exempt in IDDE ordinance
- Uncontaminated pumped groundwater – exempt in IDDE ordinance
- Discharges from potable water sources – exempt in IDDE ordinance
- Foundation drains – exempt in IDDE ordinance
- Air conditioning condensation – exempt in IDDE ordinance
- Irrigation water – exempt in IDDE ordinance
- Springs – exempt in IDDE ordinance
- Water from crawl space pumps – exempt in IDDE ordinance
- Footing drains – exempt in IDDE ordinance
- Lawn watering – exempt in IDDE ordinance
- Individual residential car washing – exempt in IDDE ordinance
- Flows from riparian habitats and wetlands – exempt in IDDE ordinance
- De-chlorinated swimming pool discharges – exempt in IDDE ordinance

- Street wash water – exempt in IDDE ordinance

Discharges or flows from firefighting activities are also excluded from the effective prohibition against non-stormwater discharges and need only be addressed where they are identified as significant sources of pollutants to Waters of the United States.

Some of the discharges listed above are present within the community. Phase II regulations state that as part of the illicit discharge program, these discharges are exempt from the City's IDDE ordinance (section 8-9B-7-a). The City's evaluation of potential illicit discharges is being performed through observations at outfalls during dry weather, through known pollutant contribution from water quality studies and City experience, or through other means. Determining the areas with natural dry weather flows will allow the City to document any significant contribution of pollutants to the MS4 and also allow the City to prioritize areas for inspection and identify illicit discharges.

D. Responsibility

The following persons or their successors shall be responsible for implementing and/or coordinating each component of the Stormwater Management Program:

Public Works Director
612 N Main St
Mitchell SD 57301
605-995-8433

4. Construction Site Stormwater Runoff Control

A. Best Management Practices (BMPs) to be Implemented

According to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems issued by the Department of Environment and Natural Resources (DENR), to satisfy this minimum control measure, the Municipal Separate Storm Sewer System (MS4) operator must:

- Develop, implement, and enforce requirements for construction activities to address pollutants in storm water runoff to the MS4. At a minimum, activities disturbing one or more acres must be addressed. Construction activities disturbing less than one acre must also be included if that construction activity is part of a larger common plan of development or sale that would disturb at least an acre.
- The selected mechanism must include the development and implementation of, at a minimum:
 - An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under state or local law;
 - Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;
 - Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
 - Procedures for site plan review that considers potential water quality impacts;
 - Procedures for receipt and consideration of information submitted by the public; and
 - Procedures for site inspection and enforcement of control measures.
- The following mechanisms can assist in meeting the requirements of this measure:
 - The MS4 operator can incorporate storm water pollution prevention requirements (such as erosion control plans, design standards, and/or the use of BMPs) into an existing "Building Permit" or development approval process.
 - The MS4 operator can reference the state's Storm Water Construction Permit requirements and provide cooperation or assistance to the state in determining compliance with their program, such as providing information on active construction projects and reporting lack of erosion control measures.

The key goal of the construction site stormwater program is to reduce pollutants in stormwater runoff to the MS4 from construction activities. Below are the proposed program elements that the City will implement as part of the program development. These are the appropriate best management practices (BMPs) that the City has proposed to comply with the Construction Site Stormwater Runoff Control minimum control measure.

1. The City shall revise its erosion and sediment control ordinance to apply to sites equal to or greater than 1 acre in area. The City shall also include a more specific provision for enforcement and sanctions to ensure compliance. The ordinance is expected to be adopted by the City in October 2014.
2. The City's proposed ordinance will require construction site operators to develop a plan for City approval and to implement appropriate erosion and sediment control BMPs. These BMPs include

preventive controls, erosion controls, sediment controls, stabilization requirements, and materials handling practices.

3. The City staff reviews site plans based on using the applicable ordinances and providing comments to the applicant. Comments are incorporated into the review for potential water quality impacts. A checklist based on the ordinance and tracking program shall be developed to standardize the review process and document review status. Reviews will be applicable to all construction projects within the City (residential, nonresidential, grading, etc.).
4. The City allows public comment on the construction sites during the planning, zoning, and council approval process. There are also opportunities for citizen comments on the effectiveness of the controls on the construction sites, by contacting the City's inspection staff. A complaint received from the public is typically managed by the Public Works Department. When a complaint is made, a Hazard/Complaint Record form is filled out and any corrective action taken is recorded. The City will evaluate its tracking system and train City staff on how to field and document construction erosion and sediment control-related public input.
5. The City's construction site inspections adhere to the requirements of the ordinance. Contractors and developers are informed of ordinance violations with verbal and written comments, the progression of which are outlined in the ordinance. The inspection procedures including inspection intervals and required records are outlined in the Soil Erosion and Sediment Control ordinance. The site inspections will be sent to the City on a monthly basis and will be performed by the permittee and checked by the City. City inspections will be tracked for each site and the City shall also include a mechanism to track violation resolution through a follow-up inspection.
6. The City will document enforcement actions taken for erosion and sediment control-related violations. The enforcement procedures are outlined in the ordinance. The violation enforcement progression (verbal, written, stop-work order, etc.) is documented in the ordinance.

B. Measurable Goals/ Schedule

The following table provides the implementation schedule and measurable goals for each BMP to meet Phase II program requirements for Construction Site Stormwater Runoff Control.

Target Date (End of Year)	Activity	Measurement
Year 1	Adopt the Erosion and Sediment Control Ordinance.	Ordinance adoption and enforcement.
	Develop written plan review and inspection procedures.	Written plan review and inspection procedures.
Year 2	Continue enforcing the erosion and construction control ordinance.	Ordinance enforcement.
	Implement plan review, inspection, and enforcement processes.	Number of sites reviewed, inspected, and enforced.
Year 3	Maintain plan review, inspection, and enforcement processes.	Number of sites reviewed, inspected, and enforced.
Year 4	Maintain plan review, inspection, and enforcement processes.	Number of sites reviewed, inspected, and enforced.
Year 5	Maintain plan review, inspection, and enforcement processes.	Number of sites reviewed, inspected, and enforced.

C. Rationale

The City conducted an assessment to compare current City programs to the requirements of the Phase II regulations. The development of the BMPs and measurable goals took the following into account.

The City currently implements various programs that may be components of the Construction Site Stormwater Runoff Control Program. The City plans on adopting a Soil Erosion and Sediment Control ordinance in October 2014 that will codify the requirements of the Construction Site Stormwater Runoff Control Program.

Develop, implement, and enforce requirements for construction activities to address pollutants in storm water runoff to the MS4. At a minimum, activities disturbing one or more acres must be addressed. Construction activities disturbing less than one acre must also be included if that construction activity; is part of a larger common plan of development or sale that would disturb at least an acre.

The City has been granted the authority to create and administer such a program through its ordinance in Section 11-A of the City code. The Erosion and Sediment Control ordinance will provide BMP direction to contractors working in the City. The City inspects work sites, responds to complaints, and has the ability to levy fines and issue stop work orders if violations are found.

An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under state or local law.

As stated above, Section 11-A of the City code requires development of an erosion and sedimentation control plan for construction sites. The Soil Erosion and Sediment Control ordinance is completed and will be adopted in October 2014. The Soil Erosion and Sediment Control ordinance is applicable to sites one acre and greater in size.

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

Construction site operators are required to adopt the BMPs outlined in the ordinance. Failure to adhere to the requirements of the ordinance may result in fines being levied on the construction site operators that do not maintain the BMPs required on their site.

Procedures for site plan review that considers potential water quality impacts.

The Soil Erosion and Sediment Control ordinance outlines the requirements for the development, submittal, and approval of an erosion and control plan for a construction site. When such plans have been created and submitted in the past, the Public Works Director has reviewed the erosion and control plan along with other submitted construction plans to ensure compliance with the ordinance. The inspection and permitting process is outlined in the ordinance.

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

A complaint received from the public is typically managed by the Public Works Department. When a complaint is made, a Hazard/ Complaint Record form is filled out and any corrective action taken is recorded. Copies of the final record form are distributed to the Public Works Director and the various division superintendents within the Public Works Department. While this current procedure is acceptable, the City must document it and ensure that it is followed to comply with the Phase II regulations.

Procedures for site inspection and enforcement of control measures.

The inspection process is outlined in the Soil Erosion and Sediment Control ordinance. The Building Inspection Division of the Public Works Department conducts regular inspections of construction sites. Upon adoption of the Erosion and Sediment Control Ordinance, the City will review all construction sites for compliance with the ordinance. The permittee is also responsible for sending monthly reports to the City. While building inspections typically focus on plumbing, framing, and building code violations, they will continue to include procedures for the inspection and documentation of erosion and sediment control practices. The ordinance outlines enforcement procedures when violations of the erosion and sediment control ordinance are discovered. The City will continue to enforce the procedures that are in place.

D. Responsibility

The following person or a successor shall be responsible for implementing and/or coordinating each component of the Stormwater Management Program:

Public Works Director
612 N Main St
Mitchell SD 57301
605-995-8433

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

A. Best Management Practices (BMPs) to be Implemented

According to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems issued by the Department of Environment and Natural Resources (DENR), to satisfy this minimum control measure, the Municipal Separate Storm Sewer System (MS4) operator must:

- Develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb at least one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts. Strategies developed and implemented must include:
 - a) A combination of structural and non-structural BMPs appropriate for the community.
 - b) Use of an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under state or local law.
 - c) Requirements to ensure adequate long-term operation and maintenance of BMPs.

The key goal of the Post-Construction Stormwater Program is to reduce pollutants in stormwater runoff from new development and redevelopment projects. Below are the proposed program elements that the City shall implement as part of the program development. These are the appropriate best management practices (BMPs) that the City has proposed to comply with the Post-Construction Stormwater Program minimum control measure.

1. The City has updated its subdivision ordinance to include post-construction BMP requirements for all projects (residential, nonresidential, etc.) greater than or equal to 1 acre. The adoption of the ordinance by the City is anticipated in October 2014.
2. The City shall document written review, approval, and inspection procedures for post-construction BMPs. Checklists and documentation procedures for these actions are outlined in the ordinance.
3. The City shall determine whether the City, private entities, or a combination of the two shall provide long-term maintenance of BMPs. A maintenance, inspection, and enforcement program for long-term BMP compliance shall be developed based upon this decision.
4. The City shall train City staff to understand design procedures, review procedures, inspection and enforcement case studies, and how different BMPs are used so that the appropriate City staff members are prepared to answer questions from the development community. Options for training include attending a stormwater workshop sponsored by other communities, providing onsite training for City staff, and partnering with local organizations (homebuilder's associations, contractor associations, etc.) to provide cooperative learning opportunities.

B. Measurable Goals/Schedule

The following table provides the implementation schedule and measurable goals for each BMP to meet Phase II program requirements for Post-construction Stormwater Management.

Target Date (End of Year)	Activity	Measurement
Year 1	Adopt the Stormwater Drainage and Detention Ordinance.	Ordinance adoption and enforcement.
Year 2	Continue enforcing the stormwater drainage and detention ordinance.	Ordinance Enforcement.
	Implement the revised stormwater requirements.	Written procedures, training program.
Year 3	Continue enforcing the stormwater drainage and detention ordinance.	Ordinance Enforcement.
	Maintain the revised stormwater requirements.	Written procedures, training program.
	Develop a long-term monitoring plan	Number of sites reviewed.
Year 4	Continue to evaluate the program.	Number of sites reviewed.
	Initiate a long-term monitoring program.	Long-term inspection tracking results.
Year 5	Continue to evaluate the program.	Number of sites reviewed, recommended program adjustments.

C. Rationale

The City conducted an assessment to compare current City programs to the requirements of the Phase II regulations. The development of the BMPs and measurable goals took the following into account.

The City currently implements various programs that may be components of the Post-Construction Stormwater Management Program. The following discussion compares the current City programs to each requirement of the post-construction stormwater management program.

Develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb at least one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts.

The City has developed a Stormwater Drainage and Detention ordinance that addresses the DENR's requirements for runoff control and water quality. The ordinance is expected to be adopted by the City in October 2014. Stormwater runoff from new development and redevelopment projects is currently addressed by Section 7.E. of the Subdivision Ordinance (No. B43), which requires storm sewer system to be designed for the 5-year design frequency storm using the Rational Design Method. The current ordinance has been interpreted to require storage of the 100-year design frequency storm with a 5-year design frequency storm release rate. This ordinance addresses stormwater quantity. The City is currently inspection and reviewing drainage plans based on the current ordinance and will continue review and inspection utilizing the new ordinance upon adoption of the new ordinance. Plan review procedures and enforcement procedures that the City follows regarding post-construction stormwater requirements will be documented. The Phase II regulations require procedures to address stormwater runoff from new development and redevelopment. Design, inspection and enforcement procedures are outlined in the Stormwater Drainage and Detention ordinance.

A combination of structural and non-structural BMPs that are appropriate for the community.

The City has developed a Stormwater Drainage and Detention ordinance that addresses the DENR's requirements for stormwater BMPs. The ordinance is expected to be adopted by the City in October 2014. Phase II regulations require the incorporation of these types of water quality BMPs and nonstructural BMPs for new development and redevelopment. The BMPs outlined in the Stormwater Drainage and Detention ordinance are effective BMPs that will be required in development plans upon adoption of the ordinance.

Use of an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under state or local law.

The City has developed a Stormwater Drainage and Detention ordinance that addresses the DENR's requirements for post-construction runoff control. The ordinance is expected to be adopted by the City in October 2014.

Requirements to ensure adequate long-term operation and maintenance of BMPs.

The City has developed a Stormwater Drainage and Detention ordinance that addresses the DENR's requirements for long term BMP maintenance. The ordinance is expected to be adopted by the City in October 2014. All existing detention ponds in the City are relatively new and primarily address water quantity. The ordinance requires a funding source for dedicated to the maintenance of stormwater controls as well as a plan that outlines the long-term maintenance required on the site's stormwater BMPs.

D. Responsibility

The following person or a successor shall be responsible for implementing and/ or coordinating each component of the Stormwater Management Program:

Public Works Director
612 N Main St
Mitchell SD 57301
605-995-8433

6. Pollution Prevention/Good Housekeeping for Municipal Operations

A. Best Management Practices (BMPs) to be Implemented

According to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems issued by the Department of Environment and Natural Resources (DENR), to satisfy this minimum control measure, the Municipal Separate Storm Sewer System (MS4) operator must:

- *Prevent or reduce storm water pollution from municipal facilities and activities.*
- *Include employee training to inform employees of impacts associated with illicit discharge and improper disposal of waste from municipal operations.*

The key goal of the pollution prevention/ good housekeeping for municipal operations program is to ensure that proactive measures are in place to reduce the pollutants from municipal operations. Below are the proposed program elements that the City shall implement as part of the program development. These are the appropriate best management practices (BMPs) that the City has proposed to comply with Pollution Prevention/ Good housekeeping for Municipal Operations minimum control measure.

1. The City has developed stormwater pollution prevention / good housekeeping training opportunities for municipal operations and has begun training staff. This training shall be done within each department or through a City-wide program. The City shall evaluate whether the proposed stormwater pollution prevention training can be incorporated into existing training programs. Checklist forms, presentations, and questionnaires shall be developed to facilitate training.
2. The City has evaluated facilities with respect to stormwater pollution potential. Documentation of good housekeeping BMPs for the various facilities has been completed and follows in the Rationale Section. Facilities that have been evaluated include:
 - Street maintenance facility
 - Wastewater Treatment plant
 - Snow dump site
 - Leaf dump site
 - Parks and recreation maintenance facility
 - Golf course maintenance facility
 - Public safety department facility
 - City parking lots
3. The City shall consider documentation of a procedure for BMP maintenance that includes detention pond mowing and maintenance as well as inlet/ catch basin cleaning. The procedure could document the frequency that inlets/ catch basins need to be cleaned, as well as documenting when cleaning is not necessary.
4. The City has established ratios of salt to sand and developed written procedures for documenting and reporting the amount of salt and other deicing materials used annually as well as the annual amount of sweeper material collected.

B. Measurable Goals/Schedule

The following table provides the implementation schedule and measurable goals for each BMP to meet Phase II program requirements for Pollution Prevention/Good housekeeping for Municipal Operations.

Target Date (End of Year)	Activity	Measurement
Year 1	Continue to train staff on stormwater BMPs and good housekeeping procedures.	Number of employees trained.
	Document catch basin and inlet cleaning procedures.	Number of structures cleaned.
Year 2	Ongoing training and BMP documentation.	Number of employees trained and documentation of good housekeeping procedures.
Year 3	Ongoing training and BMP documentation.	Number of employees trained and documentation of good housekeeping procedures.
Year 4	Ongoing training and BMP documentation.	Number of employees trained and documentation of good housekeeping procedures.
Year 5	Ongoing training and BMP documentation.	Number of employees trained and documentation of good housekeeping procedures.

C. Rationale

The City conducted an assessment to compare current City programs to the requirements of the Phase II regulations. The development of the BMPs and measurable goals took the following into account.

The City currently implements various programs that are components of the pollution prevention/ good housekeeping for municipal operations program. The following discussion compares the current City programs to each requirement of the pollution prevention/ good housekeeping for municipal operations program.

Prevent or reduce storm water pollution from municipal facilities and activities.

Current City periodic maintenance procedures and activities that are governed by this minimum measure include:

- Snow management and street sweeping. After a snow event, the City plows snow emergency routes first, followed by all east-west streets, and then all north-south streets. There is no pre-application of de-icing materials prior to snow events. Calcium chloride is used for pre-wetting as salt is applied to the streets. A 20 percent salt/ 80 percent sand mixture is generally used on secondary streets. Emergency snow routes, four-lane highways, other arterial routes, and the downtown area typically receive a mixture containing a higher salt content, at times as high as 100percent. All sand is used if the temperature is below 15 degrees Fahrenheit. The typical application rate varies from 200 to 400 pounds per lane mile. Spreader rates are computer-controlled to adjust to the proper rate independent of vehicle speed. The rate that is used is proscribed by standard salt application guidelines and is dependent upon such factors as temperature and road conditions. Salt truck crews that report to the Street and Sanitation Superintendent are responsible for covering their assigned area. The described procedures are good housekeeping BMPs implemented by the City to limit salt use.
- All downtown streets are swept every day; highways and major roads are swept once a week; and all streets in the City are swept at least once a month, weather permitting. Street sweeping activities are tracked primarily by employee time sheets. Waste that is swept up is temporarily stored at the street maintenance facility before it is hauled to the landfill. There are no water quality BMPs or monitoring at the temporary storage site. The City's street sweeping procedures are documented as part of the municipal operations program and are considered an effective BMP to limit the discharge of sediments, oils and debris at the City's outfalls.
- The City currently provides storm sewer and inlet cleaning on an as-needed basis. There are no written procedures for documenting the number of inlets or feet of sewers cleaned unless the inlet or section of sewer was cleaned because of a complaint received from the public. In such cases, a complaint/hazard form is used to track the problem and action taken. The City's catch basin and inlet cleaning program is based on visiting structures on a yearly basis. This BMP will be documented and the number of structures cleaned will be tracked on a yearly basis.
- Municipal maintenance and material storage facilities (fleet maintenance, outdoor storage areas, salt /sand storage, snow dump sites, and leaf dump sites). There are stormwater pollution prevention plans in place for the following City facilities, so additional documentation is not required:
 - Airport
 - Landfill

Additional City facilities where maintenance and storage activities occur are covered by good housekeeping controls documented for each facility:

- Street maintenance facility
- Wastewater Treatment plant
- Snow dump site
- Leaf dump site
- Parks and recreation maintenance facility
- Golf course maintenance facility
- Public safety department facility
- City parking lots

The following good housekeeping BMPs have been implemented at the above facilities and are documented by the City.

When vehicle washing occurs at any of the above facilities, the wash water is drained into the sanitary sewer. City vehicles are washed in areas that do not drain to the storm sewer.

Salt is stored in covered buildings.

Procedures are documented for the fueling of vehicles and the clean-up of fuel, oils and other vehicle maintenance fluids. The staff has been trained in how to address a spill and the procedures for cleaning up spills.

- Lawn care (mowing, pesticide, herbicide, fertilizer). The Parks and Recreation Department and Golf Course and Cemetery Department apply lawn chemicals. They provide training for their personnel and store chemicals indoors in dry chemical storage areas. The City has written procedures regarding the application of lawn chemicals, which will be used as documentation for good housekeeping BMPs.

Include training to inform employees of impacts associated with illicit discharge and improper disposal of waste from municipal operations.

City employees were trained in May 2014 in stormwater pollution prevention techniques. Outfalls were visited and outfall tracking initiated with City staff. Several City employees have received erosion control training that was sponsored by the South Dakota Department of Transportation. The City Engineering Supervisor has received training on managing stormwater using constructed wetlands. The Public Works Director, Utilities Supervisor, and Engineering Supervisor have each attended various stormwater seminars, including Phase II regulation seminars. Various City employees have viewed safety videos covering such topics as chemical safety and spill prevention and response. One City employee has received storm sewer system maintenance training conducted by DENR.

The City will continue to implement pollution prevention/ good housekeeping training for all relevant employees, including Street and Sanitary Division, Parks and Recreation Department, and Golf Course and Cemetery Department maintenance staff. The City shall evaluate how best to document current practices, adopt new practices, and implement their training programs.

D. Responsibility

The following person or a successor shall be responsible for implementing and/or coordinating each component of the Stormwater Management Program:

Public Works Director
612 N Main St
Mitchell SD 57301
605-995-8433