

CDPS MS4 Phase II

STORMWATER MANAGEMENT

PROGRAM

March 2008 – March 2013

Revision 1, January 27, 2009

Agency Name	City of Thornton
Permit Certification Number	COR - 090034
MS4 Location Description <i>(most permit certifications will cover a single city or county)</i>	City(s) Permitted: City of Thornton County Permitted: Non-Standard MS4(s) Permitted (including location descriptions):
Map	Attach MS4 Boundary Map Showing: <ul style="list-style-type: none"> • Jurisdictional Boundary (including all city, county and non-standard MS4s covered under your certification) • Permit Boundary (refer to Page 1 of your permit)
CDPS Program Descriptions	Attached
Program Implementation Area (Counties only)	<input checked="" type="checkbox"/> Permitted Area <input type="checkbox"/> Entire Jurisdiction
Joint Submittal	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes



Certification: The following certification must be signed by the Legally Responsible Person. The signer must be either a principal executive officer, ranking elected official or other duly authorized employee.

"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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name (printed): JOYCE HUNT

Title: ASST CITY MANAGER

Signature: Joyce Hunt

Date: 6-06-08

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MS4 Location Map

 City of Thornton	Overall CDPS Stormwater Management Program Perspective	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008- 2013
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Summary description of the overall water quality concerns, priorities, and goals specific to the permittee that were considered in the development of the CDPS Stormwater Management Program:

Provide information on conditions that were considered in developing your overall program. (Examples: water quality impairments or concerns, other watershed concerns, community specific pollutant concerns)

<p><i>Add Description Here</i></p> <p>In March of 2003, the City of Thornton established its first Storm Water Management Program to comply with the National Pollutant Discharge Elimination System (NPDES). This Storm Water Management Program is designed to help the City of Thornton to continue to meet the six minimum control measures as described in the Colorado Discharge Permit System General Permit as an operator of a phase II regulated small Municipal Separate Storm Sewer System (MS4). This permit authorizes the discharge of storm water associated with MS4s certified under this permit in compliance with the provisions of the Colorado Water Quality Control Act, (25-8-101 et seq., CRS, 1973 as amended) and the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et seq.;) the “Act”. Therefore, the purpose of this New Storm Water Management Program is to improve the existing program and to incorporate new requirements as stated by the new MS4 permit issued by the Colorado Discharge Permit System.</p> <p>The City of Thornton’s goals pertaining to the City’s overall storm water quality is to assure that storm water BMPs are implemented to control pollutants in runoff from new development and redevelopment construction sites and to reach out and educate the general public. The City’s priority is to provide guidance and requirements by developing procedures and enforcing the implementation of BMPs for construction sites and municipal operations.</p>
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A. Program Perspective: The goal of the Public Education and Outreach Program is to increase public knowledge of local water quality problems caused by urban runoff in order to maintain public support for local stormwater quality programs. This support ranges from individuals changing their daily actions to community backing for all stormwater program elements. The program should take into account pollutants commonly associated with the urban environment.

B. Permit Requirements

*The permittee must implement a public education program in an effort to promote behavior change by the public to reduce water quality impacts associated with pollutants in stormwater runoff and illicit discharges that includes: **(Clarified permit requirement)***

- 1) *targeting specific pollutants and pollutant sources determined by the permittee to be impacting, or to have the potential to impact, the beneficial uses of receiving waters;*
- 2) *conducting outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff; and **(Clarified permit requirement)***
- 3) *informing businesses and the general public of the municipality’s prohibitions against, and/or the water quality impacts associated with, illegal discharges and improper disposal of waste.*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s). For “Implementation Year,” provide the year the element will be implemented, or list as “Ongoing.”

1. Forming Partnerships –List and briefly describe any partnerships and memberships and describe their relevance. (Examples: Colorado Stormwater Council, Project Wet, Keep It Clean partnership, local watershed organizations, etc.).

	Public Education Program Element - Partnerships <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
1.a	Keep Thornton Beautiful (KTB) – this program involves individuals and groups, adults and children, in litter control and beautification of areas of public access, such as streets, parks, drainage-ways and open space. Keep Thornton Beautiful, an affiliate of Keep America Beautiful, sponsors a	Ongoing

	community-wide event held in conjunction with community organizations.	
1.b	Adams County Household Chemical Roundup, this program provides a convenient and safe manner in which various leftover hazardous household chemicals can be safely disposed of by county and City of Thornton citizens.	Ongoing
1.c	Adopt-a-Street program involves groups and individuals to adopt portions of streets and collectively being involved in collecting litter and debris from streets and adjacent areas.	Ongoing
1.d	Landfill Days, this program allows City of Thornton residents to bring items to the landfill that may not be able to dispose of through their regular trash service. This is a better alternative then to dispose of this items along roadways for in drainage areas.	Ongoing
1.e	Fall Leaf Collection, this program in October and November allows City of Thornton residents to place their bagged leaves at the curb for free special collection on their regular trash collection days.	Ongoing
1.f	Annual Bulk Item Pick-up, this program offers City of Thornton residents one free curbside collection of large, bulky items each year.	Ongoing

2. Using Educational Materials and Strategies – List and briefly describe your programs/methods for distributing educational materials or conducting outreach activities that have the goal of promoting changes in behavior to protect water quality.

	Public Education Program Element – Educational Materials and Strategies <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
2.a	Brochures are provided to the public at annual community events such as Thorntonfest and Harvest Fest. Brochures are also available to the public at municipal buildings.	Ongoing
2.b	Articles are published quarterly in the city’s Inside Thornton publication.	Ongoing
2.c	Channel 8 Stormwater Programming, a video pertaining to stormwater quality themes is shown on the City of Thornton’s cable channel. The intent of this educational program is to provide a basic understanding of storm water and an explanation of where storm water goes. It will also discuss how pollution can impact storm water quality, our drinking water, and our streams and waterways. A video will show for approximately four weeks annually.	Ongoing
2d	Web Site – The City maintains a website, www.cityofthornton.net , which contains a web page specific to storm water management. The web site is used to provide information pertaining to; construction, construction site operator training, illegal dumping and reporting, youth work sheets, volunteer opportunities, and a storm water survey to provide public involvement and education. The website is updated annually or as new storm water information becomes available.	Ongoing
2e	Utility Billing Insert – the insert will provide the City of Thornton residents and businesses with information pertaining to stormwater quality, community events and volunteer opportunities.	2009

3. Signage and Stenciling –List and briefly describe any outreach incorporating signage, inlet stenciling, etc. As applicable, include in the description any commitments to maintain and/or replace signage and stenciling as necessary, including those implemented under the previous permit.

	Public Education Program Element – Signage and Stenciling <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
3.a	Storm Drain Marking Program – This program is designed to raise public awareness of the connection from the storm drains to local waters. The markers are small plastic disks with information such as, “No Dumping – Drains to Lake” printed on them and are placed on inlets by volunteer organizations. The City works with volunteer organizations to install a minimum of 30 storm drain markers per year. Staff provides the volunteers with material to be distributed pertaining to pollution prevention associated with storm water runoff. Storm drains marked by the program are tracked on the City’s GIS.	Ongoing
3.b	Bus Shelter Ads are used to advertise and provide general information to the public on items related to stormwater quality. The bus shelter ads are posted at 17 locations in the City to promote awareness of the impacts of; pet wastes, lawn fertilizers, automotive fluids and leaves.	Ongoing
3.c	Storm Sewer Manhole Covers – these manhole covers are designed to educate the public on stormwater and where the stormwater goes. The manhole covers are labeled with “City of Thornton”, “No Dumping!, Drains to River”. New developments, redevelopments and Capitol Improvement Projects are required to install these manhole covers as part of the city standard storm sewer manhole covers.	Ongoing

4. Reaching Diverse Audiences – Describe how the program elements listed in the tables in Items 1, 2, and 3, above, are providing outreach to diverse audiences. Provide in your descriptions cross references to the applicable program elements listed in the tables. Examples: using bilingual materials, free household chemical collection, events are free and open to public, information and materials distributed are free and readily available, etc.

<i>Add Description Here</i>
As described above the Public Education and Outreach Program is designed to reach all audiences that live and work in the City of Thornton. These audiences include schoolchildren, adult residents, homeowner associations, business and industry, construction and development entities. All Public Education Program elements are provided free of charge to the public.

5. Illicit Discharge Education to Businesses and the Public– Describe how the program elements listed in the tables in Items 1, 2, and 3, above, inform businesses and the general public of impacts associated with illegal discharges and improper disposal of waste. Provide in your descriptions cross references to the applicable program elements listed in the tables. Examples: distributing educational materials, maintaining a website with applicable information, offering household chemical curbside pickup service, coordination with Industrial Pretreatment Program for business inspections, publishing or distributing information targeting specific business sectors, etc.

Add Description Here

As described above, each element is designed to target all audiences in the City of Thornton. The brochures, publications, community events and the city web site etc., are all designed to provide educational information and opportunities to participate in reducing and eliminating stormwater pollution.

D. Measurable Goals

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

 City of Thornton	PUBLIC PARTICIPATION/ INVOLVMENT	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008- 2013
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II. PUBLIC PARTICIPATION/INVOLVMENT

A. Program Perspective

Public participation/involvement is often discussed in the context of the public education measure because they share a common goal – reaching out to citizens to improve awareness and achieve program compliance. The distinction between the two programs is that public participation/involvement provides a conduit for citizens to participate in the development and implementation of the publicly funded stormwater program.

B. Permit Requirements

Public involvement/participation. The permittee must implement a public involvement program as follows:

- 1) *The permittee must comply with the State and local public notice requirements when implementing the CDPS Stormwater Management Programs required under this permit. Notice of all public hearings should be published in a community publication or newspaper of general circulation, to provide opportunities for public involvement that reach a majority of citizens through the notification process.*
- 2) *The permittee must provide a mechanism and process to allow the public to review and provide input on the CDPS Stormwater Management Program.*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s). For “Implementation Year,” provide the year the element will be implemented, or list as “Ongoing.”

1. Public Notices –List your local public notice requirements.


<i>Add Description Here</i>
The City of Thornton will publish notices of all public hearings in a community publication or newspaper of general circulation, to provide opportunities for public involvement. The mechanism allowing the public to review and provide input on the storm water program will be the City web site.

2. Mechanism and Processes for Public Involvement/Feedback –List and briefly describe your method(s) of publicizing contact information and directing inquires to appropriate staff. Examples are website, brochure, phone book listing, internal phone lists, hot line, etc.

	Public Involvement/Participation Program Element – Public Feedback <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
2.a	Public Participation is encouraged through public notice publications in local newspapers of general circulation and the City web site.	Ongoing
2.b	The storm water program will be available for public review on the web site during program development. The City of Thornton will provide a web survey pertaining to storm water. This survey is designed to provide the citizens with information to test their knowledge of storm water issues. The survey will also serve as a tool for providing storm water education to those taking the survey. The survey will be revised annually to add new information pertaining to storm water quality.	Ongoing

D. Measurable Goals

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

 City of Thornton	ILLICIT DISCHARGE DETECTION AND ELIMINATION	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008- 2013
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A. Program Perspective

The goal of the Illicit Discharge Detection and Elimination Program is, to the maximum extent practicable, to reduce the frequency and environmental impact of illicit discharges in which pollutants are intentionally or accidentally discharged into the storm sewer system.

B. Permit Requirements

The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 61.2) into the permittee's MS4. Illicit discharges do not include discharges or flows from fire fighting activities, or other activities specifically authorized by a separate CDPS permit.

The permittee must:

- 1) *Develop and maintain a current storm sewer system map, showing the location of all municipal storm sewer outfalls and the names and locations of all state waters that receive discharges from those outfalls.*
- 2) *To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges (except those identified in subparagraph 5 and 6 of this section) into the storm sewer system, and implement appropriate enforcement procedures and actions. (Clarified permit requirement)*
- 3) *Develop, implement, and document a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping, to the system. The plan must include the following three components: procedures for locating priority areas likely to have illicit discharges, including areas with higher likelihood of illicit connections; procedures for tracing the source of an illicit discharge; and procedures for removing the source of the discharge.*
- 4) *Develop and implement a program to train municipal staff to recognize and appropriately respond to illicit discharges observed during typical duties. The program must address who will be likely to make such observations and therefore receive training, and how staff will report observed suspected illicit discharges. (New permit requirement)*
 - i) ***Specific Deadline for Renewal Permittees:** Renewal Permittees must comply with the requirement of subparagraph (4) by no later than December 31, 2009.*
- 5) *Address the following categories of non-stormwater discharges or flows (i.e., illicit discharges) only if the permittee identifies them as significant contributors of pollutants to the permittee's MS4: landscape irrigation, lawn watering, diverted stream flows, irrigation return flow, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)),*

uncontaminated pumped ground water, springs, flows from riparian habitats and wetlands, water line flushing, discharges from potable water sources, foundation drains, air conditioning condensation, water from crawl space pumps, footing drains, individual residential car washing, dechlorinated swimming pool discharges, and water incidental to street sweeping (including associated side walks and medians) and that is not associated with construction.
(Clarified permit requirement)

The permittee may also develop a list of occasional incidental non-stormwater discharges similar to those in the above paragraph, (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-stormwater discharges must not be reasonably expected (based on information available to the permittee) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions the permittee has established for allowing these discharges to the MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs, etc.). The permittee must document in their program any local controls or conditions placed on the discharges. The permittee must include a provision prohibiting any individual non-stormwater discharge that is determined to be contributing significant amounts of pollutants to the MS4.

- 6) *The following sources are excluded from the prohibition against non-stormwater discharges and the requirements of subsections (2) and (3) above:*
- i) Discharges resulting from emergency fire fighting activities. Such discharges are specifically authorized under this permit (see Part I.A.2).*
 - ii) Discharges specifically authorized by a separate CDPS permit.*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2 of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Outfall map - Describe the status of your outfall map; i.e., has it been completed as required by the previous permit? Briefly describe the process that has been implemented for updates to the map when new outfalls are constructed.

Add Description Here

A Storm Sewer System Outfall Map developed by the City identifies the major drainage ways located within the City of Thornton as well as the outfall points along these drainage ways. This map is designed to demonstrate a basic awareness of the intake and discharge area of the stormwater system. It is used to help determine the locations of discharged dry weather flows, the possible sources of the dry weather flows, and the particular water bodies these flows may be affecting. The map provides a means of assisting City staff in responding to and tracing illicit discharges.

The Storm Sewer System Map is part of the City's Geographical Information System (GIS). The base data for this map is from Urban Drainage and Flood Control District. The outfall reference system used in locating outfall points is the State Plane NAD83 reference system. The outfall points were located by using a Global Positioning System (GPS) receiver. The Storm Sewer System Map is updated on a regular basis as new outfall points are being incorporated into the City's GIS.

2. Regulatory mechanism –List all ordinances (or other applicable controls) used to implement the Illicit Discharge Detection and Elimination program. For all ordinances/controls, provide the title, date of adoption/revision, and a brief description of the authority granted (e.g., provides enforcement authority, inspection authority, etc.).

Add Description Here

The City currently has an existing regulatory mechanism under the City Code making it illegal to discharge, throw, deposit, cause, or permit any non-stormwater discharges into the storm sewer system in accordance with Section 18-934 Unauthorized Use of a Storm Water System (Code 1975, § 58-4.409; Ord. No. 2279, § 138, 8-9-93), Section 38-393 Nuisances Enumerated (Code 1975, § 34-11; Ord. No. 240, 8-2-66; Ord. No. 836, 10-9-78; Ord. No. 1369, 6-25-84; Ord. No. 2268, § 1, 7-12-93; Ord. No. 2297, § 3, 12-20-93; Ord. No. 2344, § 2, 9-12-94; Ord. No. 2550, § 7, 7-12-99; Ord. No. 2953, § 3, 8-8-06), and Section 74-116 Unlawful Discharge (Code 1975, § 40-35; Ord. No. 1278, 9-12-83). The City’s Code Compliance Division and Water Resources Division are responsible for the enforcement procedures and actions to be taken.

3. Illicit Discharge Detection and Elimination Plan –Briefly describe plans and procedures in place for the following required actions:
 - Locating priority areas likely to have illicit discharges
 - Tracing the source of illicit discharges
 - Removing the source of illicit discharges

Add Description Here

The Tracking, Evaluating, and Reporting Illicit Discharges procedure is designed to assist City staff in locating priority areas for illicit discharges, educating staff on illicit discharge recognition, tracking the source and providing the appropriate response for removal purposes. Training is provided on an as needed basis. This training assists City staff during their typical duties in locating and recognizing illicit discharges, and the proper reporting procedure for illicit discharges. The City performs periodic visual dry weather inspections using the procedure described above. Sampling will occur as needed in areas of suspect outfalls as well as follow-up inspections as needed.

4. Staff Education – List program(s) to educate staff and contractors in the field on observing, reporting, and responding to illicit discharges. You may provide a cross reference to the Municipal Operations program if this program element is covered there. Briefly describe the type (e.g., class room, web based, briefings, etc) and frequency of training program(s) conducted. If training has not been fully implemented, provide a measurable goal in Part D, below.

Add Description Here

The City of Thornton has implemented a procedure for tracking, evaluating, and reporting illicit discharges. This procedure was implemented to provide training for City staff involved with periodic visual dry weather inspections. This training is provided as a briefing and instruction on an individual basis to specific City staff performing dry weather illicit discharge detection inspections. Additional staff education and training will be developed and implemented as part of the measurable goal described in Part D of this program to fulfill the requirement in Part I,B,3,a,4 of the CDPS General Permit for Stormwater Discharges Associated with MS4s.

D. Measurable Goals

Measurable Goals are required for Staff Education as per Part I.B.3(a)(4) of the permit (Permit Requirement (4), in Part B, above), unless this new permit condition is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.

1. Staff training program(s) listed in Part C.4, above, have been fully implemented and are ongoing.

(It is not necessary to complete Part 3 below if you check this box.)

2. One or more staff training program(s) have **NOT** been fully implemented and measurable goals have been provided in Part 3 below for each of the pending programs.

(You must complete Part 3 below if you check this box.)

3. Illicit Discharge Detection and Elimination Measurable Goals: Include those staff training program(s) that have **NOT** already been fully implemented, and provide the year by which implementation will occur. **Measurable Goals must be completed by 2009.**

	Illicit Discharge Detection and Elimination Measurable Goals - Training <i>List each program element, briefly describe. Provide the year(s) for implementation</i>	Implementation Year
3.a	In order to fully implement the educational requirement of the new permit term, the City of Thornton plans to implement the training program for tracking, evaluating, and reporting illicit discharges. The existing program will be expanded to educate City staff in recognizing and responding to illicit discharges observed during their regular work assignments. This program will target staff in various divisions including but not limited to; Streets, Fleet Maintenance, Parks, Development Engineering, Building Inspections, Code Compliance, and the Fire Department. This training will be provided for all targeted groups as well as for new staff members on an as-needed basis. The initial training will involve classroom training and yearly refresher briefings.	2009

 City of Thornton	CONSTRUCTION SITES RUNOFF CONTROL	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008- 2013
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A. Program Perspective

The goal of the Construction Sites Runoff Control Program is to reduce, to the maximum extent practicable, sediment and other construction-related pollutants from entering the municipal separate storm sewer system.

B. Permit Requirements

The permittee must:

- 1) *Develop, implement, and enforce a program to reduce pollutants in any stormwater runoff, and to reduce pollutants in, or prevent when required in accordance with I.B.3, non-stormwater discharges that have the potential to result in water quality impacts (e.g., construction dewatering, wash water, etc.), to the MS4 from construction activities that result in a land disturbance of one or more acres. Reduction of pollutants in discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one or more acres. If the Division waives requirements for stormwater discharges associated with a small construction activity in accordance with 61.3(2)(f)(ii)(B) (the “R-Factor” waiver), the permittee is not required to develop, implement, and/or enforce its program to reduce pollutant discharges from such a site. **(Clarified permit requirement)***
- 2) *Develop and implement the program to assure adequate design, implementation, and maintenance of BMP’s at construction sites within the MS4 to reduce pollutant discharges and protect water quality. The program must include, at a minimum, the development, implementation, and documentation of:*
 - i) *Program Requirements, including:*
 - A) *An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions and procedures adequate to ensure compliance, to the extent allowable under State or local law.*
 - B) *Requirements for construction site operators to implement appropriate erosion and sediment control BMP’s.*
 - C) *Requirements for construction site operators to implement BMP’s to control waste such as discarded building materials, concrete truck washout, chemicals, litter, sanitary waste, and other non-stormwater discharges including construction dewatering and wash water, at the construction site that may cause adverse impacts to water quality. **(Clarified permit requirement)***

ii) *Compliance Assessment, including:*

- A) *Procedures for site plan review which incorporate consideration of potential water quality impacts.*
- B) *Procedures for construction site compliance assessment, including:*
 - 1) *Site inspections; and*
 - 2) *Receipt and consideration of information submitted by the public.*

iii) *Compliance Assurance, including:*

- A) *Procedures for enforcement of control measures that includes documented procedures for response to violations of the permittee's program requirements. Procedures must include specific processes and sanctions adequate to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures. **New permit requirement***
 - 1) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirement of subparagraph (A) to develop, document and implement response procedures that specifically address chronic and recalcitrant violators by no later than December 31, 2009.*
- B) *An education and training program for municipalities, their representatives and/or construction contractors. At a minimum, the program must include an information program for construction site operators unfamiliar with the reviewing authority's regulatory requirements.*

C. Program Elements: By using existing, on going program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Regulatory Mechanism to require BMPs and sanctions to ensure compliance – List all ordinances (or other regulatory mechanisms) your Construction Sites program is operating under that allow you to require BMPs and enable sanctions to ensure compliance. For all ordinances/mechanisms, provide the title and date of adoption/revision.

Add Description Here

The City's current regulatory mechanisms are under the City Code requiring the use of temporary sedimentation and erosion control measures, enforcement of temporary sediment, and erosion control facilities. City Code sections that apply are; Section 18-929 Sedimentation and Erosion Control (Code 1975, § 58-4.404; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2655, § 8, 2-12-01; Ord. No. 2935, § 3, 1-10-06), Section 22-115 Grading (Ord. No. 2433, § 1, 9-9-96), Section 22-117 Hazards (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2656, § 6, 2-12-01), and Section 22-156 Responsibilities of permittee (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2616, § 3, 7-10-00; Ord. No. 2656, § 19, 2-12-01; Ord. No. 2935, § 6, 1-10-06). The City also has an existing regulatory mechanism under the City Code to mitigate discarded

construction material of any type on construction sites, Section 22-132 Permit Conditions (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2616, § 1, 7-10-00; Ord. No. 2656, § 8, 2-12-01; Ord. No. 2687, § 21, 10-22-01) .

In 2006 the City adopted a Storm Water Management Plan , Ordinance Number 2935, to amend City Code to implement construction site runoff and post construction runoff minimum control measures, inspect the construction of, and enforce the maintenance of permanent stormwater quality BMP's, for all new development and redevelopment within the City of Thornton.

2. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and materials handling BMPs - [List the design criteria, BMP manuals, or fact sheets used to guide construction site operators in the selection and design of appropriate BMPs, stabilization methods and materials handling practices. For all items, provide the title and date of adoption/revision.](#)

Add Description Here

The City does not issue a grading or building permit until the applicant has submitted proof of filing an application with the State for a storm water discharge permit associated with construction activity, or proof that such a permit is not required. This is a requirement per City Code Section 18-930 Compliance with State and Federal Storm Water Quality Control Measures (Code 1975, § 58-4.405; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2935, § 4, 1-10-06) and Section 18-929 Storm Water Management Plan (Code 1975, § 58-4.404; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2655, § 8, 2-12-01; Ord. No. 2935, § 3, 1-10-06).

The Urban Drainage and Flood Control District (UDFCD) Volume III Criteria Manual – Best Management Practices dated September 1999 as amended or most current edition, is used as the technical reference. Other applicable BMPs will be considered for approval when submitted with applicable information and performance standards.

3. Requirements for construction site operators to control waste including discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste –[List all ordinances \(or other regulatory mechanisms\) used that require construction site waste control. For all ordinances/mechanisms, provide the title and date of adoption/revision.](#)

Add Description Here

The City currently works with developers, contractors, and property owners to address problems associated with stormwater quality as they may arise at construction sites. Enforcement actions by the City will be taken when other means of getting the site into compliance have been unsuccessful.

Construction permits issued by the City require that erosion controls be properly installed, maintained, and removed. Construction phase enforcement begins when deficiencies are present at the construction site. Enforcement of the City's control measures, including City Code Section 22-191 Suspension or Revocation of Permit (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2616, § 5, 7-10-00; Ord. No. 2656, § 23, 2-12-01), are enforced by City inspectors and Code Compliance.

4. Procedures for site plan review which incorporate consideration of potential water quality impacts –

- a. Site Plan Development: Briefly describe your requirements for construction site operators to develop stormwater control site plans based on the minimum design criteria.
- b. Site Plan Review: Briefly describe your site plan submittal, review, and preliminary approval process (e.g., is a checklist used?). Describe your system to track status of stormwater control site plans. Describe procedures for ongoing review of site plans during active construction (e.g., how are plans reviewed after construction starts and is additional approval required for revisions?) The MS4 is not required to review and/or approve all plans, but must demonstrate adequate project oversight to prevent inadequate plans.

Describe how consideration of potential water quality impacts is achieved (e.g., ordinance requires a permit, which requires a plan, which requires that water quality impacts be considered; water quality impacts are required to be addressed by development code; etc.). The MS4 is not required to review and/or approve all plans, but must demonstrate adequate project oversight to prevent inadequate plans.

Add Description Here

- a. The City's minimum design requirements for the development of stormwater control site plans is based on City Code Section 18-926 Adoption of Storm Drainage Master Plans and Drainage Criteria Manuals (Code 1975, § 58-4.401; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2935, § 2, 1-10-06). The code references the Standards and Specification for the City and the UDFCD Urban Storm Drainage Criteria Manual Volumes 1, 2, and 3, as amended.
- b. The City currently reviews site plans submitted for all development, re-development, and capital improvement projects within the City of Thornton. This review process includes the review, comment, and approval of temporary erosion and sediment control and the projects potential impact on water quality. Per City Code Section 18-929 Storm Water Management Plan (Code 1975, § 58-4.404; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2655, § 8, 2-12-01; Ord. No. 2935, § 3, 1-10-06) no grading or building permit is issued by the City until the applicant has submitted proof of filing an application with the State for a discharge permit for stormwater discharges associated with construction activity or proof that such a permit is not required. All projects are assigned to a City Construction Inspector or Construction Coordinator for oversight and inspection during the construction phase. The stormwater management plan is monitored by the inspector/coordinator throughout the construction phase. Erosion and sediment control site plans are reviewed by the inspector/coordinator at various phases of the project to ensure the storm water site plans are being updated accordingly to adjust for changes in construction phases. Permanent water quality site features are inspected as a part of the overall construction process. Permanent water quality structures are approved during the initial acceptance process. This approval determines the final as-built condition of the permanent water quality structures to ensure conformance to the design intent. Changes to permanent water quality structures are not allowed without appropriate design review and approval by the City. The UDFCD Volume III Criteria Manual – Best Management Practices (BMPs) dated September 1999 as amended or most current edition, is used as the technical reference.

- 5. Procedures for receipt and consideration of information submitted by the public. Describe how inquiries are processed (i.e., received by, or forwarded to the MS4 Stormwater Program) and responded to. Describe how complaints are tracked and documented.

Add Description Here

The City accepts citizen e-mails, letters, and calls as they relate to stormwater. All calls are entered into the City's customer service tracking system (Hansen database) and assigned to staff for follow-up. Staff records all actions taken to resolve the stormwater related requests submitted by the public.

6. Procedures for site inspection and enforcement of control measures
 - a. Inspections: Describe procedures used for inspections, and list any manuals or other documentation used by your staff that includes inspection procedures. Include a description of how inspections are documented; how the frequency of inspections is determined; how sites are prioritized for inspections, if past experiences with construction site operators influence frequency; and how sites and inspections are tracked. Describe procedures for regularly scheduled compliance inspections, complaint response inspections, and reconnaissance inspections, as applicable to your program.
 - b. Enforcement: Describe procedures used for enforcement, and list any manuals, response guides, or other documentation used by your staff that dictate how and when a response to non-compliance is carried out and those enforcement actions are tracked. Describe enforcement tools used (e.g., withholding permits, inspections, plan review, C.O., letter of non-compliance, stop work, permit revocation, notice of violation, monetary fines, summons). Describe how enforcement actions are escalated as needed to prevent repeat violations associated with chronic or recalcitrant violators. If procedures are not already fully implemented to address chronic and recalcitrant violators, provide a measurable goal in Part D, below.

Add Description Here

- a. The City currently conducts construction site inspections for all development, re-development, and capital improvement projects. Reconnaissance level inspections are conducted by the construction inspection staff during each site visit to assess the site for indicators of noncompliance. At a minimum these inspections are completed weekly. Inspectors assess erosion and sediment controls and BMP maintenance. These inspections are documented in the inspector/coordinator daily report or log books when deficiencies are found. If noncompliance indicators exist, or frequent noncompliance issues exist, then a full level inspection may be conducted by an inspector, with adequate training, to determine if the stormwater management plan and the approved site plans have been implemented and if additional BMPs are necessary. The full level inspections are prioritized by the frequency of noncompliance indicators found, size of project and project proximity in relation to State waters. All full level inspections are tracked by project with adequate documentation to assure the site is in full compliance with its stormwater management plan and site plans. Documentation for full compliance inspections is tracked by year, inspections and all documents are filed with the end of year reports for future reference or re-accruing noncompliance issues. Citizen complaints related to construction activities may also be considered as indicators for noncompliance. Citizen complaints are assigned to staff for resolution and are tracked on the City's Hansen data base.
- b. Noncompliance issues are addressed in accordance with City Code Section 22-156 Responsibilities of Permittee (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2616, § 3, 7-10-00; Ord. No. 2656, § 19, 2-12-01; Ord. No. 2935, § 6, 1-10-06) and are enforced, if necessary, by Section 22-191 Suspension for Revocation of Permit (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2616, § 5, 7-10-00; Ord. No. 2656, § 23, 2-12-01). The enforcement requires issuing a notice to comply or a notice to stop all work until the violation is corrected. If non-compliance continues, a summons may be issued.

7. Training and Education for Construction Site Operators – This program element must, at a minimum, include an informational program for construction site operators unfamiliar with the MS4’s (reviewing authority’s) regulatory requirements. Describe how training/education is implemented. Describe the use of any fact sheets, pre-development documents, permit applications, pre-construction meetings, web sites, etc. that outline the MS4 (and/or State) construction requirements pertaining to stormwater.

Add Description Here

The City conducts pre-construction meetings with contractors and developers; the meeting is a forum for the City to provide guidance and information necessary for the contractors to meet the City’s regulatory requirements prior to construction. The City website is referenced as the minimum informational program for construction site operators that are unfamiliar with City and State regulations as it relates to storm water. The website offers construction information, City requirements as well as general BMP details and standard notes that can be utilized in developing a contractor’s stormwater management plan.

In addition to the website, the City is also in the process of revising and improving a brochure that has been developed to assist contractors in becoming more familiar with City and State requirements. The revisions to the brochure will be complete in December 2008. This brochure is intended as a tool for providing regulatory requirements to the contractors at the pre-construction meeting.

The City permitting system and City Code currently requires contractors to obtain a storm water permit from the State prior to acquiring a City Construction Permit. This requirement is discussed at the pre-construction meeting and verified at the time the permit is issued by the City.

Reconnaissance inspections performed by inspectors/coordinators are also used to inform and provide guidance to active contractors.

As a goal for 2009 the City intends to improve on the information and education provided during pre-construction meetings. The City may utilize short videos, checklists, or other literature to elevate stormwater awareness pertaining to construction site runoff. In addition, the City intends to utilize these new materials to further enhance staff awareness related to construction site runoff.

D. Measurable Goals

Measurable Goals are required for the requirement in Part I.B.4(a)(2)(iii) of the permit (Permit Requirement (2)(iii) in Part B, above) unless this new permit requirement is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.

1. Procedures, as listed in Part C.5.b, above, have already been fully implemented to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.

(It is not necessary to complete Part 3 below if you check this box.)

2. Procedures have **NOT** already been fully implemented to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.

(You must complete Part 3 below if you check this box.)

3. Construction Sites Program Measurable Goals: The Measurable Goal has been provided. Include the year by which full implementation of procedures will be achieved to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures will be implemented. **Measurable Goals must be completed by 2009.**

	Construction Sites Program Measurable Goals – Chronic and Recalcitrant Violators <i>Provide the year for implementation</i>	Implementation Year
3.a	Fully implement procedures to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures	2009

 City of Thornton	POST-CONSTRUCTION STORMWATER MANAGEMENT	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008- 2013
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A. Program Perspective

The goal of the Post-Construction Stormwater Management program is to implement planning procedures and enforcement mechanisms to reduce, to the maximum extent practicable, stormwater impacts resulting from areas of new development and significant redevelopment.

B. Permit Requirements

Post-construction stormwater management in new development and redevelopment.

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

- 1) *Develop, implement, and document strategies which include the use of structural and/or non-structural BMPs appropriate for the community that address the discharge of pollutants from new development and redevelopment projects, and/or that maintain or restore hydrologic conditions at sites to minimize the discharge of pollutants and prevent in-channel impacts associated with increased imperviousness; (**Clarified permit requirement**)*
- 2) *Use 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;*
- 3) *Develop, implement, and document procedures to determine if the BMPs required under Item (1), above, are being installed according to specifications. (This may be developed in conjunction with the Construction program area, as described in Part I.B.4);*
- 4) *Develop, Implement, and document procedures to ensure adequate long-term operation and maintenance of BMPs, including procedures to enforce the requirements for other parties to maintain BMPs when necessary; (**Clarified permit requirement**)*
- 5) *Develop, implement, and document an enforcement program, which addresses appropriate responses to common noncompliance issues, including those associated with both installation (subparagraph (3), above) and long term operation and maintenance (subparagraph (4), above) of the required control measures; (**Clarified permit requirement**)*
- 6) *Develop and implement procedures and mechanisms to track the location of and adequacy of operation of long-term BMPs implemented in accordance with the program. (**Clarified permit requirement**)*

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Regulatory mechanism – List all ordinances (or other applicable controls) used to implement the post-construction program. For all ordinances/controls, provide the title, date of adoption/revision, and a brief description of the authority granted (e.g., provides enforcement authority, inspection authority, etc.). The ordinance or other mechanism must have language requiring that new development and significant redevelopment projects disturbing more than or equal to one acre, and those less than one acre but part of a larger common plan of development or sale, incorporate stormwater management BMPs.

Add Description Here

The City's current regulatory mechanisms for New Development and Redevelopment are under the City Code. City Code sections that apply are; Section 18-926 Adoption of Storm Drainage Master Plans and Drainage Criteria Manuals (Code 1975, § 58-4.401; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2935, § 2, 1-10-06), Section 18-930 Compliance with State and Federal Storm Water Quality Control Measures (Code 1975, § 58-4.405; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2935, § 4, 1-10-06), Section 18-929 Storm Water Management Plan (Code 1975, § 58-4.404; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2655, § 8, 2-12-01; Ord. No. 2935, § 3, 1-10-06), Section 22-115 Grading (Ord. No. 2433, § 1, 9-9-96), Section 22-117 Hazards (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2656, § 6, 2-12-01), and Section 22-156 Responsibilities of Permittee (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2616, § 3, 7-10-00; Ord. No. 2656, § 19, 2-12-01; Ord. No. 2935, § 6, 1-10-06). The City also has an existing regulatory mechanism under the City Code to mitigate discarded construction material of any type on construction sites, Section 22-132 Permit Conditions (Ord. No. 2433, § 1, 9-9-96; Ord. No. 2616, § 1, 7-10-00; Ord. No. 2656, § 8, 2-12-01; Ord. No. 2687, § 21, 10-22-01).

2. Design Criteria and Standards– List any SOPs or Design Criteria required, such as Urban Drainage Flood Control District's Volume 3 –BMP Manual, or plan review checklists, for the selection and design of appropriate structural and non-structural BMPs appropriate for the community. List any planning tools such as Master Plans, Comprehensive Plans, Zoning Plans and regional BMPs.

Add Description Here

The City's design criteria and standards for New Development and Redevelopment are under the standard specifications and the City Code. City Code sections that apply are:

Section 18-926. Adoption of Storm Drainage Master Plans and Drainage Criteria Manuals (Code 1975, § 58-4.401; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2935, § 2, 1-10-06)

Sec. 18-929. Storm Water Management Plan. (Code 1975, § 58-4.404; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2655, § 8, 2-12-01; Ord. No. 2935, § 3, 1-10-06)

Sec. 18-930. Compliance with State and Federal storm water quality control measures. (Code 1975, § 58-4.405; Ord. No. 2279, § 138, 8-9-93; Ord. No. 2935, § 4, 1-10-06)

The City has developed and implemented a Storm Water Ordinance, Number 2935 to amend City

Code. The ordinance implemented is for construction site runoff and post construction runoff minimum control measures. Enforcing the development, construction, and the maintenance of permanent storm water quality BMP's, and structural and non-structural BMP's on all new development and redevelopment within the City of Thornton.

3. Review and Approval Procedures

- i. Plan Review – Briefly describe your process for review and approval of permanent water quality control plans. Describe your system to track status of plans.
- ii. Field verification – Describe how the correct installation of BMPs is confirmed, and the enforcement procedures used when BMPs have not been built as approved.
- iii. If different procedures are used for municipal projects, roadway construction, etc., include a description here.

Add Description Here

- i. The City currently reviews site plans submitted for all development, redevelopment, and capital improvement projects within the City of Thornton. This review process includes the review, comment, and approval of temporary erosion and sediment control and permanent water quality control plans.
- ii. City inspectors provide field verification to assure the ongoing site plans remain in conformance with the existing site conditions and installation.

- i. Tracking – Describe how permanent BMP locations and maintenance history are tracked.

Add Description Here

The locations of the permanent BMP's are tracked on the City's Geographical Information System (GIS). The City inspection and maintenance history is tracked on the City's Hansen data base.

- j. Requiring long-term operation and maintenance of BMPs – Describe how you require the long-term operation and maintenance of permanent water quality controls. List methods used, such as drainage easements; language on recorded plats requiring legal title holder be responsible for BMP maintenance; legal authority to inspect, require, perform maintenance and recoup costs; requiring creation of HOA or owner's association; and procedures to determine if BMPs are installed or constructed in accordance with specifications.

Add Description Here

In order for the City to ensure adequate long-term operation and maintenance of BMP's the City currently implements and enforces City Code Section 18-808 Utility Requirements. This section requires the developer to maintain the drainage in accordance with requirements set forth in the Subdivision Plat or approved drainage plans until transferred to the new owner or owners association, in which event shall assume the maintenance responsibility of the property. Section 18-929 Storm Water Management Plan also requires the owner of the property to be responsible for maintenance of the private drainage improvements once the project is complete.

k. Monitor long-term compliance –

- ii. Inspections - Describe your inspection programs, including routine and complaint response inspections.

- iii. Enforcement –List appropriate enforcement responses used, such as verbal warning to the developer/property owner, letter of noncompliance, notice of violation, chargeback to contractor for work completed by MS4 representatives, and/or municipal summons.

Add Description Here

Post-construction inspections for stormwater quality BMPs, and adequacy of operation are conducted on a citywide basis once every three years. Inspection results are entered into the City’s customer service tracking system and assigned to staff for follow-up. The City accepts citizen e-mails, letters, and calls as they relate to stormwater maintenance complaints. All calls are entered into the City’s customer service tracking system database and are assigned to staff for follow-up. In the event of a non-compliance issue the City will issue an Initial Notice to Comply, if not resolved a Notice and Order of Violation will follow.

D. Measurable Goals

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

 City of Thornton	POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008- 2013
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A. Program Perspective

The goal of the Pollution Prevention/Good Housekeeping for Municipal Operations program is to reduce, to the maximum extent practicable, the amount and type of pollution that is generated by municipal operations or from municipally-owned property.

B. Permit Requirements

The permittee must develop and implement an operation and maintenance program that includes an employee training component and has the ultimate goal of preventing or reducing pollutants in runoff from municipal operations. The program must also inform public employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations. The program must prevent and/or reduce stormwater pollution from facilities such as streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by the permittee, and waste transfer stations, and from activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of municipal facilities, and stormwater system maintenance, as applicable. The permittee must:

- 1) *Develop and maintain written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee’s municipal operations. The program must specifically list the municipal operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The program must also include a list of industrial facilities the permittee owns or operates that are subject to separate coverage under the State’s general stormwater permits for discharges of stormwater associated with industrial activity; **(New permit requirement)***
 - i) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirements of subparagraph (1) by no later than December 31, 2009.*
- 2) *Develop and implement procedures to provide training to municipal employees as necessary to implement the program under Item 1, above. **(Clarified permit requirement)***

C. Program Elements: By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2 of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Implementation of an operation and maintenance program - Describe your Pollution Prevention and Good Housekeeping program. Address how oversight of the program's implementation is conducted (e.g., internal audits or reporting). As discussed in Part D, below, you have until 2009 to develop written procedures for all operations and facilities addressed under the Pollution Prevention/Good Housekeeping program. Most permittees will need to provide a measurable goal to fully audit existing procedures and to document at least some additional procedures to meet this permit requirement. The 2009 Annual Report (due March 10, 2010) must include an inventory of all documented procedures. Therefore, it is not necessary to document all currently existing procedures in this submittal.

Add Description Here

Municipal operations include a wide variety of activities conducted to maintain City owned property and facilities such as streets, parks, and utilities. The City has developed and implemented operations and maintenance programs for landscape, fleet, material storage, roadway, drainage-way, and storm water systems. This program will be updated to specifically address the municipal operations and facilities impacted. The updates will provide for training of municipal staff on the impacts associated with illegal discharges and improper disposal of wastes and the impact on storm water quality.

2. Employee Training program - Describe your program(s) to educate municipal employees on implementing procedures for the Pollution Prevention and Good Housekeeping program.

Add Description Here

The City conducts in-house employee training sessions and encourages participation in training by other relevant organizations. Each City division is responsible for training associated with the maintenance activities for which it is responsible. Employee training includes training on how to incorporate pollution prevention/good housekeeping techniques in municipal operations such as parks and open space maintenance, fleet and building maintenance, and stormwater system maintenance.

D. Measurable Goals

Measurable Goals are required as per Part I.B.6(a)(1) of the permit (Permit Requirement (a)(1) in Part B, above), unless this new permit requirement is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.

1. Written procedures and lists, as listed in Part C.3, above, for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations, have already been developed.
 (It is not necessary to complete Part 3 below if you check this box.)
2. Written procedures and lists for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations have **NOT** already been fully developed.
 (You must complete Part 3 below if you check this box.)

3. Pollution Prevention/ Good Housekeeping Measurable Goals: The Measurable Goal has been provided. Include the year when written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations will be fully developed. **Measurable Goals must be completed by 2009.**

	Pollution Prevention/ Good Housekeeping Measurable Goals <i>Provide the year(s) for implementation</i>	Implementation Year
3.a	Review existing documented procedures, and develop new written procedures, as necessary, for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations. The documentation must specifically list the municipal operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The documentation must also include a list of the industrial facilities the permittee owns or operates that are subject to separate coverage under the State's general stormwater permits for discharges of stormwater associated with industrial activity.	2009

