



Minnesota Pollution Control Agency

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

MS4 SWPPP Application for Reauthorization

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

Doc Type: Permit Application

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

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

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

General Contact Information (*Required fields)

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

*MS4 permittee name: Olmsted County *County: Olmsted
(city, county, municipality, government agency or other entity)
*Mailing address: 2122 Campus Drive SE #200
*City: Rochester *State: MN *Zip code: 55904
*Phone (including area code): 507-328-7070 *E-mail: sheehan.michael@co.olmsted.mn.us

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

*Last name: Sheehan *First name: Mike
(department head, MS4 coordinator, consultant, etc.)
*Title: Olmsted County Public Works Director
*Mailing address: 2122 Campus Drive Se #200
*City: Rochester *State: MN *Zip code: 55904
*Phone (including area code): 507-328-7070 *E-mail: sheehan.michael@co.olmsted.mn.us

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

Last name: Langer First name: Skip
(department head, MS4 coordinator, consultant, etc.)
Title: Olmsted Soil & Water Conservation District Technician
Mailing address: 1485 Industrial Dr NW
City: Rochester State: MN Zip code: 55901
Phone (including area code): 507-280-2850 E-mail: skip.langer@mn.nacdnet.net

Verification

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

Certification (All fields are required)

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

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

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

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

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

Name: Michael Sheehan
(This document has been electronically signed)

Title: Olmsted County Public Works Director Date (mm/dd/yyyy): 12/30/13

Mailing address: 2122 Campus drive SE #200

City: Rochester State: MN Zip code: 55904

Phone (including area code): 507-328-7070 E-mail: sheehan.michael@co.olmsted.mn.us

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

Stormwater Pollution Prevention Program Document

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

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

No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
City of Rochester – education, collaboration, outreach	MCM1, MCM2, MCM3, MCM 4, MCM 5, MCM 6
Olmsted townships: Rochester, Cascade, Haverhill, Marion	MCM1, MCM2, MCM3, MCM 6
MNDOT – Area 6	MCM1, MCM2
RCTC, Federal Medical Center	MCM2

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

The Rochester Urbanized Area Stormwater group is a locally coordinated partnership between the MS4 groups listed above. The group has met quarterly for many years to coordinate stormwater outreach, share ideas on management of the MS4, discuss the development and implementation of new regulation and support each other in our MS4 coordination and management process. Annually, partners listed above have provided education and outreach to the public at large through participation in or coordination of community events where the importance of engaging in small scale individual home and neighborhood sized stormwater management projects have been stressed. These events are also opportunities for the MS4 entities to convey information to the public about how the stormwater within its jurisdiction is managed to protect water quality in our area. The partnership connections within this group have also fostered relationships that have allowed for the development of opportunities to partner together on larger projects that provide water quality improvements, flood attenuation and habitat enhancement in and outside of the urbanized area.

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

Illicit discharges

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

1. If yes:

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

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

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

Citation:

Olmsted County Ordinance No. 13-02: Olmsted County Illicit Discharge Ordinance, adopted April 9, 2013

Direct link:

<http://www.co.olmsted.mn.us/pw/StormWater/Documents/Ordinance%20%202013-02%20%20-%20Recorded%20Illicit%20Discharge%20Ordinance.pdf>

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

2. If no:

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

Construction site stormwater runoff control

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

1. If yes:

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

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

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

Citation:

Olmsted County Zoning Ordinance: Article X General Regulations: Section 10.20 SOIL EROSION, SEDIMENTATION, RUNOFF, AND SLOPE STABILITY CONTROLS:

Direct link:

<http://www.co.olmsted.mn.us/planning/ordinances/Documents/Olmsted%20County/CountyZonOrdinance/ARTICLE%2010.pdf>

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

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

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

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

While Olmsted County does have an ordinance regarding the regulation of Erosion and Sediment Control for construction sites, Olmsted County will review the language to see that it satisfies the requirements to be as stringent as MPCA's general permit to discharge stormwater associated with construction activity. One of the tasks of the new Olmsted Public Works stormwater committee will be to review the current language in the Ordinance and provide an updated version (where necessary) that meets the intent of the new CSW permit. This work will take place during the 12 months following permit approval.

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

- 1. Best Management Practices (BMPs) to minimize erosion. Yes No
- 2. BMPs to minimize the discharge of sediment and other pollutants. Yes No
- 3. BMPs for dewatering activities. Yes No
- 4. Site inspections and records of rainfall events Yes No
- 5. BMP maintenance Yes No
- 6. Management of solid and hazardous wastes on each project site. Yes No
- 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. Yes No
- 8. Criteria for the use of temporary sediment basins. Yes No

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

In the 12 months following the permit approval by mpca, Olmsted County will be reviewing the Erosion, Sedimentation, Run-off and Slope Stability Controls section of the Olmsted Zoning Ordinance to ensure that the language within the ordinance is at least as stringent as the newest Construction Site Stormwater Runoff Control permit language. The ordinance will be reviewed and language will be added to meet the requirements of the 8 sections of the CSW permit above.

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?

Yes No

1. If yes:

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

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

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

Citation:

Olmsted County Zoning Ordinance: Article X General Regulations: Section 10.20 SOIL EROSION, SEDIMENTATION, RUNOFF, AND SLOPE STABILITY CONTROLS

Direct link:

<http://www.co.olmsted.mn.us/planning/ordinances/Documents/Olmsted%20County/CountyZonOrdinance/ARTICLE%2010.pdf>

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

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

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

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

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

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

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

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

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

a. Limitations

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

- a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
- b) Where vehicle fueling and maintenance occur.
- c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
- d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.

2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: Yes No

- a) With predominately Hydrologic Soil Group D (clay) soils.
- b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.

- c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
- d) Where soil infiltration rates are more than 8.3 inches per hour.
- 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. Yes No
4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
- a. Mitigation project areas are selected in the following order of preference: Yes No
- 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
- b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Yes No
- c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. Yes No
- d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. Yes No
- e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. Yes No
- f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). Yes No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. Yes No
- b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. Yes No
- c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. Yes No

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

2a & b. While there are requirements in place to address volume control limitations and reductions in new and redevelopment projects, we have not addressed the limitation requirements of TSS and TP in stormwater. These will be addressed in 2014 during Public Works Stormwater committee meetings to determine how to apply this to the current stormwater program and maintain permit compliance.

3a.1 & 2. It is unlikely that the County will have these types of facilities within its MS4 jurisdiction. However, Olmsted County staff can work collaboratively with the adjacent MS4, the City of Rochester, to ensure that restrictions are in place to protect environmentally sensitive features from contamination through infiltration practices. Olmsted County's MS4 jurisdiction is primarily a system of vegetative ditches that serve as a filtration mechanism for stormwater, we do not incorporate any infiltration BMP's into the current road system within the MS4 area. The Public Works stormwater committee will review the requirements under the new permit, identify deficiencies and make changes and additions to the ordinance based on those findings.

3a.3. While the County always attempts to acquire all necessary right of way for its road projects to provide any necessary stormwater BMP installation measures, most of the area development where these standards would be required and enforced is generally out of our MS4 jurisdiction and under the jurisdiction of the adjacent MS4s. The Public Works stormwater committee will review the requirements under the new permit, identify deficiencies and changes or additions to address post construction stormwater management activities prior to their commencement

4. a-f. Olmsted County does not have permitted development or construction projects requiring stormwater management and potentially subject to stormwater mitigation rules taking place within in our MS4 jurisdiction. These activities are permitted in the adjacent MS4 jurisdiction and subject to their stormwater rules and regulations.

5. a-c. Olmsted County is the sole owner and operator of its MS4. There are no outside owners or operators that have permits to construct or maintain stormwater BMP's within the County's MS4 jurisdiction. The County addresses all concerns relating to stormwater within its own jurisdiction including planning, implementation, construction and long term maintenance of its stormwater BMP's. The adjacent MS4 will have wider jurisdiction in the Rochester Urbanized Area to manage the long term maintenance, inspection and regulation of stormwater BMP's in private development within their MS4.

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

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? Yes No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

The County will be reviewing their Enforcement Response Procedures relating to its MS4 jurisdiction over the next 12 months to ensure that it is meeting the requirements of the new permit rule. The form that this regulatory mechanism should take will be determined during a meeting of the Public Works stormwater committee within the first 6 months of the new permit term.

B. Describe your ERPs:

In a previous permit, the County has designated the Olmsted Soil & Water Conservation District (SWCD) service line (#280-2850) as the general reporting location to receive storm water related inquiries, service requests, complaints, or reports of alleged violations. The SWCD staff are responsible for logging stormwater calls that require follow-up actions and documenting the actions required to resolve the issue, including referral to other agencies, as needed.

There are procedures in place through the Rochester-Olmsted Planning Department review of grading plan applications and subsequent inspections by staff that may provide the procedural basis to develop the official emergency response procedures. ROPD will assist the Public Works stormwater committee with the development of the ERP's to satisfy the new permit

During the 12 months following permit approval by mpca, the Olmsted County staff will review their current enforcement response procedures and will provide updates to the regulatory mechanism that enforce the County's SWPPP and provide for the necessary documentation of these actions.

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

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

The points are collected and stored by the Olmsted County survey staff. The information is stored as a GIS database and accessible by Public Works staff. The information can be used for follow up inventory and can be updated as needed.

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

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. Yes No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an Yes No

associated geographic coordinate.

3. Structural stormwater BMPs that are part of the permittee's small MS4. Yes No
4. All receiving waters. Yes No

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

An analysis will be completed in the next 12 months to determine if there are any receiving waters affected by the counties MS4 jurisdiction that should be included in the MS4 map. Any features identified will be assigned by their type a unique identification number and geographical coordinate of its location and added to the current map.

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

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

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

Olmsted County will provide the analysis necessary to determine if there is any wetlands, lakes or ponds that need to be mapped within the MS4 jurisdiction. This action will be taken within 12 months of the permit approval by MPCA.

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

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

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

A. MCM1: Public education and outreach

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

Olmsted County's current MS4 education and outreach program consists of a variety of opportunities to engage the public about stormwater treatment, reduce pollution delivery and implementation techniques available to protect local streams and rivers from potential pollution delivered through stormwater run-off events.

Our county website has a page devoted to stormwater and includes volunteer opportunities for the public to engage in activities such as the popular adopt-a-highway program. We also provide links to brochures and educational materials on the construction and installation of rain gardens and rain barrels as well as tips to curb pollutant delivery in your neighborhood. Olmsted County participates in a wide range of local events targeting school aged children to adults providing information on buffering of waterways, using native vegetation in our landscape and ideas for capturing and treating stormwater on a yard by yard basis.

Many of these events are large community events where hundreds to thousands of individuals will come together for their purposes of gathering information to take home to help implement measures that accumulative may help improve the water quality in the Rochester Urbanized Area (RUA).

Due to the adjacency of the County's MS4 relative to other RUA MS4 jurisdictions, many of our local education and outreach efforts work in concert with each other. The priority of Olmsted County's MS4 program is to encourage the adoption and implementation of stormwater improvement activities and projects by citizens living and working within the

Rochester Urbanized Area that will enable the County's MS4 to function in the highest capacity.

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

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

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

Established BMP categories	Measurable goals and timeframes
Distribute educational materials to the public through a collaborative effort with the adjacent Rochester Urbanized Area (RUA) MS4 entities.	# of events participated in, audience type, # of educational material distributed, # of attendees, topics covered. Timeframe will be ongoing through term of permit.
Develop and distribute digital media through the County Stormwater webpage to increase awareness about stormwater discharge and the steps individuals can take to reduce pollutants in stormwater.	# of website hits to page, downloaded materials, topics visited. Timeframe will be ongoing through term of permit.
Partner with RUA entities to send mailings, radio and TV ads, articles in the newspaper, press releases, posters, direct mailings, fact sheets, bill stuffers, presentations.	# of materials distributed, type, topics covered. Timeframe will be ongoing through term of permit.
Collaborate with U of MN Extension to provide classroom visits for the Ag in the Classroom program targeting elementary students grades 3-5 at area schools that elect to participate free of charge.	Program takes place each spring annually. Record number of schools visited, # of students and age/grade attending, topics discussed. Program will continue annually.
BMP categories to be implemented	Measurable goals and timeframes
Form a new Public Works Stormwater committee to review permit materials and rule requirements and make recommendations to effectively manage the County's MS4	Committee will be created in early 2014. Initial meetings may happen monthly but will likely become a quarterly meeting as the permit is approved. Meeting minutes and those in attendance will serve as the record. These meetings will take place throughout the permit coverage.
Meet as County Public Works stormwater committee to re-access high priority stormwater issues to focus education efforts to public.	Development of new materials to distribute. On-going effort through permit term starting in first 12 months of new permit
Analyze current stormwater webpages with Public Works webmaster to redesign for simplification of use and ease of information access.	Mechanism for user feedback, # of site hits. BMP will be in place in 12 months and be an on-going activity of the permit.

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

Mike Sheehan, Olmsted Co Public Works Dept.

B. MCM2: Public participation and involvement

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

Olmsted County does produce an annual stormwater report and presentation to the county board based on the stormwater management activity that takes place during each calendar year. As part of the annual reporting process, Olmsted County Public Works provides notice to the general public that there will be an annual meeting and requests that the public may provide input and feedback to the county regarding the MS4 program. This information is used to measure the adequacy of the SWPPP and to guide any potential modification that could arise. The written comments provided before the annual meeting will be reviewed during the meeting and incorporated into the annual report where appropriate while oral comments made during the annual meeting can be considered for incorporation into the SWPPP after the meeting is complete. The SWPPP and annual reports are available for public viewing on the Olmsted County Public Work's stormwater webpage at any time.

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

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

Established BMP categories	Measurable goals and timeframes
Annual MS4 stormwater meeting – host annual meeting to inform the public about the annual stormwater management activities of the County.	The meeting will be held in conjunction with the Olmsted County Board meeting. The public will be invited to provide comments and opinions on the adequacy of the SWPPP and provide suggestions for modifications. A 30 day public notice will be given prior to holding the meeting which will take place prior to June 30 th of any year. The number of public participating in the public meeting will be recorded as well as all comments.
Notice for public written comments on Annual MS4 report. As part of the public meeting, the public will have an opportunity to provide written comments to be incorporated into the Annual meeting and annual report for 30 days prior to the annual meeting	All public comments will be noted as part of the annual report and determination as to whether modifications may be reflected in the report if comments are pertinent to the MS4 annual report. Number of comments will be summarized and discussions included in annual plan. This will take place annually through the permit timeframe.
Annual MS4 report available to public for review.	The board approved final annual report will be displayed on the County stormwater website by July 15 th each year. The annual report to will available to the public anytime.
Adopt-a-highway program – continue to advertise sections of county highway available for litter pickup	# of 2 mile sections of highway cleaned up each year. Public Works road crews will pick up garbage after clean up complete. This will take place annually during permit term.
BMP categories to be implemented	Measurable goals and timeframes
SWPPP document available to public on website	The completed SWPPP document will be available on the county stormwater website to the public for review and will be accessible at anytime
Provide MS4 presentation to Olmsted County Township Officers at Annual Township Officers meeting	Once annually in September, number of township official in attendance
Provide Township Cooperative Planning Association (TCPA) information and links to Olmsted County's stormwater webpage	In 2014, work with TCPA officials to provide links to the County's stormwater information to place on their website.

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

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

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

Mike Sheehan, Olmsted County Public Works

C. MCM 3: Illicit discharge detection and elimination

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

Olmsted County has written and the County Board approved the Olmsted County Illicit Discharge Ordinance (No 13-02) on April 9, 2013. The ordinance was crafted with input by Rochester-Olmsted Planning Department (ROPD), Olmsted Public Works, Olmsted SWCD, and the area MS4 townships. Guidance was given by MPCA staff.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?
- a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). Yes No
 - b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. Yes No
 - c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. Yes No
 - d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. Yes No
 - e. Procedures for the timely response to known, suspected, and reported illicit discharges. Yes No
 - f. Procedures for investigating, locating, and eliminating the source of illicit discharges. Yes No
 - g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. Yes No
 - h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). Yes No

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

2c. Olmsted County Public Works will seek training for the appropriate staff in the identification of illicit discharge types. This will be completed during annual culvert inspections. The training materials will be sought out in early 2014 and training time will be set up for staff.

2d. The Public Works stormwater committee will meet to discuss if and where there should be priority areas within the MS4 jurisdiction. If areas are identified as priorities, the locations of culverts, outfalls and receiving waters can be identified and conveyed to those doing the MS4 stormwater inventory as target areas. 20% of the stormwater features will be inventoried each year of the permit to meet current permit requirements.

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

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

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

Established BMP categories	Measurable goals and timeframes
IDDE Ordinance review	Review and revise the ordinance to meet the current intent of the rule and effectively management the County MS4. Prepare amendments to the ordinance as required to adopt updates. Process will take place through the permit term.
Updated stormwater jurisdiction map on website	Staff will work with webmaster to place the updated jurisdictional map on website for public display. Annual review by staff to determine if changes are needed during permit term.
Maintain records of IDDE complaints, calls, responses	Staff will maintain a database with # of calls, locations, corrective actions taken. Through permit term.
BMP categories to be implemented	Measurable goals and timeframes
Provide training to the appropriate Public Works staff on the identification and detection of illicit discharges	Public Works stormwater committee will review and approve training material for public works staff involved in the inventory of stormwater features within the MS4 so that they are aware of any and all potential illicit discharges that may occur. Identification of training material will occur in 2014, with

	recommendation from MPCA staff of best available education materials available on multi-media formats. Training will be on-going for public works staff involved and as needed during permit term.
Update stormwater map to reflect 2010 census areas	Staff will update map to delineate areas included in by the new 2010 census survey. Highlight areas where stormwater enters and leaves the County's MS4 jurisdiction. Identify any new stormwater features within the jurisdiction. The updates will start in 2010 and continue until complete and up to date.
Develop illicit discharge brochure for public information circulation and website	Seek material for the brochure and create, place on website and print copies for public in county offices. # of brochures handed out annually. Update as necessary through permit term.

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? Yes No
- If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

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

Mike Sheehan, Olmsted County Public Works

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

Olmsted County has a variety of established mechanisms that are used to provide for construction site storm water runoff control, such as: the Soil Erosion, Sedimentation, Runoff, and Slope Stability Ordinance (Olmsted County Zoning Ordinance 10.20), runoff control plan review and approval procedures, and when the County has direct responsibility for construction projects over one acre, compliance with MPCA's NPDES construction storm water permit is required. When applicable, due to location of activity, Olmsted County will refer erosion and sediment control inspections and stormwater enforcement activities to the appropriate neighboring MS4 communities (City of Rochester, Cascade Township, Haverhill Township, Marion Township and Rochester Township).

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? Yes No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? Yes No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? Yes No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? Yes No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? Yes No
 - 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? Yes No
 - 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? Yes No
 - e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? Yes No
 - f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? Yes No
 - g. Does your program retain construction site inspection checklists or other written materials used to Yes No

document site inspections?

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

2b. While the county planning and zoning or public works department does not have a mechanism that would trigger an operator or owner to obtain the MPCA permit during the grading plan or conditional use permit reviews and approval, the City of Rochester whose MS4 jurisdiction surrounds the Countys MS4 in most all cases, does use these procedures to ensure that permits are acquired. This will be discussed at the stormwater committee meeting and changes and updates to these procedures will be developed and implemented to meet the requirement of the new permit.

2d1. There is no procedure for selecting priority sites. This can be addressed when the Public Works stormwater committee meets in 2014.

2d2. There is no frequency specified for inspections. This will be addressed by the Public Works stormwater committee meeting in 2014.

2d3. While Olmsted Planning department does have a staff person, Randy Klement, that will do inspections, they are generally only conducted based on complaints. The city of Rochester does have full time staff persons that do all the construction site inspections with in the Rochester Urbanized Area. This would likely cover the scope of the construction areas that would affect the County's MS4 jurisdiction and permit. This will be discussed when the Public Works Stormwater Committee meets and changes and updates to these procedures will be developed and implemented to meet the requirement of the new permit.

2d4. There may be a checklist used for site inspections when there is a complaint but it will need to be reviewed to determine if it meets the permit requirments. This will be completed when the permit is extended by MPCA. The City of Rochester uses an inspection process to determine compliance during inspections.

2g. When inspections are required on construction projects within County MS4 jurisdiction, The Olmsted County Stormwater committee will create a mechanism to file inspections worksheets in project folders for retention and review. This will be discussed by Public Works staff and Rochester-Olmsted Planning Department staff when permit is extended by MPCA.

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

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

Established BMP categories	Measurable goals and timeframes
Construction site plan reviews, grading plan reviews, Conditional Use permits issued. Plans are reviewed by Rochester-Olmsted Planning Department and routed through other County staff for comments on adequacy of proposed grading, erosion & sediment control and stormwater management plans.	# of plans, # of ESC inspections, # of enforcement actions, # of permits issued. On-going through permit term.
Project manager review of county construction plans to ensure appropriate ESC BMP recommendations are contained in plans and specifications prior to construction.	# of plans reviewed, # of ESC inspections, # of enforcement actions. On-going through permit term.
BMP categories to be implemented	Measurable goals and timeframes
Permit applicant information review – stormwater fact sheet	Work with Rochester-Olmsted Planning department staff, Township Cooperative Planning staff and City of Rochester staff to ensure that landowners and contractors have the appropriate information on stormwater management regulations when applying for grading & construction permits.

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

Mike Sheehan, Olmsted County Public Works

E. MCM 5: Post-construction stormwater management

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

The County's requirement for contractors to construct BMP's that manage the post construction stormwater is accomplished, in part, through the Soil Erosion, Sediment, Run-off, and Slope Stability ordinance (Olmsted County Zoning Ord 10.20) as well as through the plat review and comment process and utilizing the NPDES construction storm water permit guidelines for all sites disturbing an acre or more.

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

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

3b & 3c. Olmsted County does not authorize any stormwater mitigation within its MS4 jurisdiction so there is no documentation generated however, the City of Rochester does accept an "in lieu of" payments for stormwater treatment mitigation and uses the funds paid by developers and contractors to construct large regional type stormwater facilities that may provide treatment for storm water that flow to or through the County's MS4. The County stormwater committee will review in the 12 months following permit approval to ensure that it is meeting the requirement of the new permit. Updates will be made as needed.

3d. The County Stormwater committee will review its legal mechanisms for maintenance of long term stormwater BMP's outside its jurisdictional boundary and make updates to meet the new permit requirement, however, it is likely that most of legal responsibility for these structural BMP's will lie physically within the jurisdiction of an adjacent MS4 and be regulated by them. County review will take place during the 12 months following permit approval.

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

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

Established BMP categories	Measurable goals and timeframes
Public Works staff will continue the routine inspection of public structural stormwater management BMP's to ensure they are functioning properly within the MS4	# of BMP's inspected, # of maintenance work orders generated, type of maintenance performed
MS4 stormwater features inventory	Inspection of 20% of MS4 outfalls, sediment basins and ponds annually

BMP categories to be implemented	Measurable goals and timeframes
County engineering staff will become more familiar with	Training opportunities attended, staff involved, # projects with

BMP design, implementation and construction potentials to be incorporated into future road projects within the MS4 area to provide opportunities for infiltration, filtration, peak discharge reduction and pollutant uptake as cost effective and appropriate site conditions allow.

innovative stormwater designs, associated cost of practice. Conducted during permit term as funding & staff is available.

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

Mike Sheehan, Olmsted County Public Works

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

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

Olmsted County currently does inspections on 20% of the culverts and outfalls within the MS4 each year. From the inspections a maintenance work order list is generated and public works staff performs the required maintenance. Annually each spring, public works staff sweeps MS4 jurisdictional roads to recapture sand used during winter months for road safety and stockpiles or re-uses in road and road shoulder rehabilitation projects. Sweeping continues into the summer mainly to collect litter from chronic problem areas within the MS4.

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

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

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

Established BMP categories	Measurable goals and timeframes
Inspection of 20% of MS4 outfalls, sediment basins and ponds annually	Record of inspection and details relating to conditions of stormwater features, any maintenance required, maintenance performed
Street sweeping within MS4 jurisdiction	Record with dates, yards of material collected, how collected material was disposed or used. Annually during permit
BMP categories to be implemented	Measurable goals and timeframes
Education to Public Works staff on maintenance procedures and record keeping within the MS4 area.	# of staff at meeting, minutes of discussions/proceedings. Conduct within 12 months of permit and as needed if staff responsibilities change.
Create checklist for any inspection of any stockpile, storage and handling facilities at Public Works Service Center.	Inspect quarterly to ensure integrity and effectiveness of BMP's. File inspection checklist as record. During permit term.

Record of stormwater training received by relevant public works staff	Topics, who attended, dates, storage location of records. Develop in 2014 and on-going as necessary during permit term.

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? Yes No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? Yes No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? Yes No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? Yes No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? Yes No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? Yes No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? Yes No
- b. Covers the requirements of the permit relevant to the duties of the employee? Yes No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? Yes No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? Yes No

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

6. *Olmsted County will collaborate with the City of Rochester to see how they are handling the TSS and TP effectiveness determinations and see about including the 3 ponds under Olmsted County MS4 jurisdiction with their testing program. Olmsted County staff will contact city stormwater staff regarding collaboration in 2014 and implement during permit term.*

7. *Olmsted County does do inspections and does have procedures in place to do these inspections but we will review and evaluate the checklist and record keeping procedures to assure they are up to permit standards.*

8. *Olmsted County Public Works will be working to implement a training program for relevant public works staff to address stormwater management and illicit discharge. Olmsted County will work with City of Rochester staff to see what materials they are using, We may also collaborate with other MS4's from the Minnesota Inter-County Association MS4 counties as well as looking to MPCA stormwater staff for guidance on training topics & materials available. This will start in 2014 and be on-going as necessary through the permit term.*

9. *Documentation of inspections and maintenance of stromwater features in the MS4 is already underway by public works staff however we will develop a record of staff receiving stormwater related trainings in coordination with the above activities. This will coincide with beginning stormwater training for relevant staff and be on-going during the permit term.*

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

Mike Sheehan, Olmsted Public Works Director

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

A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? Yes No

1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

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

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

A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? Yes No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

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

VIII. Add any Additional Comments to Describe Your Program

WLA reductions (TMDL) Waste Load Allocations – Olmsted County

MS400064 Lower Mississippi River Basin Fecal Coliform Bacteria TMDL 07040004-501 -

The County will continue to maintain the system of well vegetated ditches along its roadways which due to their width, length and depth create a capacity to provide excellent opportunities to filter pollutants, uptake nutrients and store sediment to improve water quality discharging to local streams and other MS4 areas. This system is maintained by periodic mowing which prolongs the effectiveness of the filter strip through active management of the vegetation. Ditches are regularly surveyed to determine if capacity is diminished through sediment accumulation. Public works road crews will remove sediment, reseed bare soil, provide additional BMP installation, where needed, to strengthen and protect the stormwater conveyance system integrity as well as restoring capacity, function and value.

As new technologies are developed and roads are reconstructed, the County will research potential innovative and cost effective methods to provide additional treatment within the right of way of its MS4 road system to improve the treatment of stormwater run-off. These strategies are going in Olmsted County through the permit term. It is very unlikely that there is any significant contribution of fecal coliform bacteria to these waters from the county's jurisdictional MS4.

MS400064 Zumbro River Watershed TMDL for Turbidity Impairments 07040004-507 –

As stated in the above WLA, the County maintains a system of well vegetated ditches as its primary MS4 stormwater conveyance system. Great care is taken to maintain this system to the highest effective standard to provide the greatest reduction of sediment and other pollutants in stormwater run-off. This system of vegetated ditches acts as a filter strip by providing retardance of flow, allowing for sediment removal and storage, providing nutrient uptake, filtering other pollutants and improving the water quality at discharge points in the MS4 system.

All culverts through the MS4 system are inventoried during the permit term and when required, sediment is removed to ensure they are functioning to designed capacity. All materials are removed for reuse in other locations. Public works road crews also remove sediment from ditches, reseed bare soil, provide additional BMP installation, where needed, to strengthen and protect the stormwater conveyance system integrity as well as restoring capacity, function and value.

As new technologies are developed and roads are reconstructed, the County will research potential innovative and cost effective methods to provide additional treatment within the right of way of its MS4 road system to improve the treatment of stormwater run-off. These strategies are going in Olmsted County through the permit term.