

SOUTHEAST METRO STORMWATER AUTHORITY
Acting by and through
SEMSWA WATER ACTIVITY ENTERPRISE

RESOLUTION 17-16

Regarding Authorization to Execute a CDPS Non-Standard MS4 Permit No COR-070000
Application to Clarify Permit Responsibilities for the Special District Permit Areas within
Unincorporated Arapahoe and Douglas Counties

WHEREAS, the Southeast Metro Stormwater Authority (SEMSWA) accepted the transfer of the Non-Standard Colorado Discharge Permit System's (CDPS) Permit that Authorizes Discharges from a Municipal Separate Storm Sewer System (MS4) under General Permit No. COR-070000 (Non-Standard MS4 Permit) from Arapahoe County Water and Wastewater Authority (ACWWA), East Cherry Creek Valley Water and Sanitation District (ECCV) and Inverness Water and Sanitation District (IWSD) (the Special District Permit Areas); and

WHEREAS, SEMSWA was issued a Standard CDPS Permit that Authorizes Discharges from an MS4 under General Permit No. COR-080000 (Standard MS4 Permit) that includes the Special District Permit Areas in their entirety; and

WHEREAS, some portion of the Special District Permit Areas are located in unincorporated Arapahoe and Douglas Counties; and

WHEREAS, Arapahoe County holds a Standard MS4 Permit that includes the Special District Permit Areas within unincorporated Arapahoe County; and

WHEREAS, Douglas County holds a Standard MS4 Permit that includes the Special District Permit Areas within unincorporated Douglas County; and

WHEREAS, SEMSWA is not authorized to make land use decisions within unincorporated Arapahoe County or Douglas County and, therefore, cannot fulfill permit responsibilities under a Standard MS4 Permit for areas within unincorporated Arapahoe County or Douglas County; and

WHEREAS, the Special District Permit Areas within unincorporated Arapahoe County and Douglas County are more suitably characterized within the SEMSWA Service Area as Non-Standard MS4 Permit areas; and

WHEREAS, SEMSWA desires to apply for a Non-Standard MS4 Permit to more accurately reflect the CDPS Permit responsibilities within the Special District Permit Areas.

NOW THEREFORE, BE IT RESOLVED THAT:

The Board authorizes the Executive Director of SEMSWA to complete, submit and pay the permit fee regarding the Non Standard MS4 Permit application for the Special District Permit Areas for the purposes of carrying out SEMSWA's MS4 Permit responsibilities within the Special District Permit Areas located within unincorporated Arapahoe County and Douglas County.

Date: _____

ATTEST:

Secretary

Chairperson

APPROVED AS TO FORM:

Attorney for
Southeast Metro Stormwater Authority

By _____
Edward J. Krisor



COLORADO DISCHARGE PERMIT SYSTEM (CDPS)
Authorization to Authorization to Discharge
Under the Colorado Discharge Permit System
MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

General Permit Application

For Division Use Only

Permit #

Date Received

PHOTO COPIES, FAXED COPIES, PDF COPIES OR EMAILS WILL NOT BE ACCEPTED.

Please print or type. Original signatures are required. All items must be completed accurately and in their entirety for the application to be deemed complete. Incomplete applications will not be processed until all information is received which will ultimately delay the issuance of a permit. Applications must be submitted to:

Colorado Department of Public Health and Environment
Water Quality Control Division
4300 Cherry Creek Drive South
WQCD-P-B2
Denver, Colorado 80246-1530

Any additional information that you would like the Division to consider in developing the permit should be provided with the application on a CD or other electronic method.

PERMIT INFORMATION

Reason for Application: ☒ **NEW CERTIFICATION UNDER GENERAL PERMIT # COR070000**

☐ **EXISTING PERMIT CERTIFICATION # COR-07** _____

A. CONTACT INFORMATION

Permittee (If more than one please add additional pages)

Organization Formal Name: Southeast Metro Stormwater Authority (SEMSWA)

1. Permittee the person authorized to sign and certify the permit application. This person receives all permit correspondences and is legally responsible for ensuring compliance with the permit.

Responsible Position (Title): Executive Director

Currently Held By (Person): John McCarty

Telephone No: 303-858-8844

Email address jmccarty@semswa.org

Organization: Southeast Metro Stormwater Authority

Mailing Address: 7437 South Fairplay Street

City: Centennial State: Colorado Zip: 80112

This form must be signed by the Permittee to be considered complete.

Per Regulation 61: In all cases the permit application shall be signed as follows:

- In the case of corporations, by a responsible corporate officer. For the purposes of this section, the responsible corporate officer is responsible for the overall operation of the facility from which the discharge described in the application originates.
- In the case of a partnership, by a general partner.
- In the case of a sole proprietorship, by the proprietor.
- In the case of a municipal, state, or other public facility, by either a principal executive officer or ranking elected official



2. DMR Cognizant Official (i.e. authorized agent)—the person or position authorized to sign and certify reports required by permits including Discharge Monitoring Reports [DMR's], Annual Reports, Compliance Schedule submittals, and other information requested by the Division. The Division will send pre-printed reports (e.g. DMR's) to this person. If more than one, please add additional pages



Same as Permittee Item 1

Responsible Position (Title): _____

Currently Held By (Person): _____

Telephone No: _____

Email address _____

Organization: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

Per Regulation 61: All reports required by permits, and other information requested by the Division shall be signed by the permittee or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (i) The authorization is made in writing by the permittee;
- (ii) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and
- (iii) The written authorization is submitted to the Division.

3. Site/Local Contact—contact for questions regarding the facility & discharges authorized by this permit



Same as Permittee—Item 1

Responsible Position (Title): Environmental Resources Division Director

Currently Held By (Person): Lanae Raymond

Telephone No: 303-858-8844

Email address lraymond@semswa.org

Organization: Southeast Metro Stormwater Authority

Mailing Address: 7437 South Fairplay Street

City: Centennial State: Colorado Zip: 80112

4. Billing Contact (if different than the permittee)



Same as Permittee—Item 1

Responsible Position (Title): _____

Currently Held By (Person): _____

Telephone No: _____

Email address _____

Organization: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

5. Include any other permit contact information on a CD or other electronic method.

B. LOCATION OF THE MS4

Location description (narrative) If more space is needed, submit on a CD or other electronic method.

This permit application is for the areas of East Cherry Creek Valley Water and Sanitation District (ECCV), Arapahoe County Water and Wastewater Authority (ACWWA), and Inverness Water and Sanitation District (Inverness) located within unincorporated Arapahoe County and Douglas County.

C. MAP OF AREA

Attach a map of the MS4 that indicates the city, town, or district boundaries, and urbanized area (UA) boundaries, if part(s) of the MS4 is within a UA.
Submit map on a CD or other electronic method is preferred.
If no map is submitted, the application is not complete and a permit will not be issued.

Attached.

D. RECEIVING WATERS

Include all named receiving waters within the permitted area, including other MS4s. If discharge is to a ditch or storm sewer, include the name of the ultimate receiving waters

Immediate Receiving Water(s): Cottonwood Creek, Lone Tree Creek, Dove Creek, Windmill Creek, Cherry Creek, Piney Creek, West Toll Gate Creek, East Toll Creek, Unnamed Creek

Ultimate Receiving Water(s): South Platte River

Identify the receiving water of the stormwater from your site. Receiving waters are any waters of the State of Colorado. This includes all water courses, even if they are usually dry. If stormwater from the construction site enters a ditch or storm sewer system, identify that system and indicate the ultimate receiving water for the ditch or storm sewer. Note: a stormwater discharge permit does not allow a discharge into a ditch or storm sewer system without the approval of the owner/operator of that system.

E. OTHER ENTITIES

Include the name of all entities that will perform some or all of the program areas for your MS4.

F. FOR RENEWAL APPLICATIONS ONLY - COMPLIANCE

Is the Permittee in compliance with or has substantially complied with all terms, conditions, requirements, and schedules of compliance of the expiring permit?

☐

Yes

☐

No

G. FOR RENEWAL APPLICATIONS ONLY -SUBSTANTIAL CHANGES

Describe any substantial changes related to the facility or discharge occurring since the issuance of the existing permit, which materially affects the quantity or quality of the permitted effluent.

H. ADDITIONAL INFORMATION

Include any additional information that the division may find reasonably necessary to evaluate the application. This information should be submitted on a CD or by another electronic method

I. REQUIRED SIGNATURES

Signature of Applicant: The applicant must be either the owner and/or operator of the construction site. Refer to Part B of the instructions for additional information.

The application must be signed by the applicant to be considered complete. In all cases, it shall be signed as follows:

Regulation 61.4(1)(e)

- a) In the case of corporations, by the responsible corporate officer is responsible for the overall operation of the facility from which the discharge described in the form originates
- b) In the case of a partnership, by a general partner.
- c) In the case of a sole proprietorship, by the proprietor.
- d) In the case of a municipal, state, or other public facility, by either a principal executive officer or ranking elected official. (A principal executive office rhas responsibility for the overall operation of the facility from which the discharge originates.)

SIGNATURE OF PERMIT LEGAL CONTACT

"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."

Signature of Legally Responsible Person (submission must include original signature)

Date Signed

John McCarty

Executive Director

Name (printed)

Title

DO NOT INCLUDE PAYMENT – AN INVOICE WILL BE SENT AFTER THE PERMIT IS ISSUED.

CDPS MS4 Phase II

STORMWATER MANAGEMENT

PROGRAM DESCRIPTIONS

FOR NON-STANDARD PERMIT HOLDERS (COR-070000)

Agency Name	Southeast Metro Stormwater Authority (SEMSWA)
Permit Certification Number	COR - 07 _ _ _ _
MS4 Location Description: List all Cities and Counties Permitted MS4s are located within	Cities: Counties: Arapahoe County, Douglas County
Map	<p>Attach</p> <p>A location map for the MS4 (hard copy only) must be submitted. The boundaries of permit coverage must be indicated. The map must be of sufficient detail so that the exact boundaries, by street or other demarcation, can be determined.</p> <p>The map must show the district/facility boundaries or service area, as applicable. If multiple separate locations are permitted (e.g., multiple campuses, parks, etc.), a map for each location must be provided. For any locations that are partially within an urbanized area, the location map must show the urbanized area boundaries. Urbanized Area information and maps are available online at:</p> <p>www.cdphe.state.co.us/wq/PermitsUnit/stormwater/municipal.html</p>
CDPS Program Descriptions	Attached

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): John McCarty

Title: Executive Director

Signature: _____

Date: _____

TABLE OF CONTENTS

Instructions

MCM1: Public Education & Outreach

MCM 2: Public Participation/Involvement

MCM 3: Illicit Discharge Detection & Elimination

MCM 4: Construction Site Runoff Control

MCM 5: Post-Construction Stormwater Management

MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations

CDPS Stormwater Management Program Descriptions Instructions

A. Applicability

This template is applicable for **renewal permittees** covered under the Non-Standard MS4 general permit COR-070000. This template is **not** applicable to Standard MS4s permitted under the COR-080000 and COR-090000 general permits.

B. Filling out the Template

This template is intended to be filled out electronically, with additional lines added to the sections as descriptions are entered. Text in **blue** provides direct guidance on filling out the template, and should be given special attention.

C. Submitting the Program Description

A complete program description, including the original signed certification on page 2, must be submitted to the Water Quality Control Division with this application.

The submittal must include an original signature. E-mailed or faxed copies will **not** be accepted.

D. Completeness

The form must be completed accurately and in its entirety, or it will be deemed incomplete. This template is intended to be a summary of all of the content for the CDPS Stormwater Management Program Submittal required by Part I.A.7 of the Non-Standard MS4 general permit, COR-070000. The descriptions provided must be detailed enough for the Water Quality Control Division to determine the permittee's general strategy for complying with the required items in each of the six CDPS Stormwater Management Program Minimum Control Measures (Parts I.B.1-6 of the general permit).

E. Cited Permit Requirements

Subsection B of this template for each of the six Minimum Control Measures includes citations of the specific permit requirements.

MS4 NAME	PUBLIC EDUCATION & OUTREACH	STORMWATER DISCHARGES ASSOCIATED WITH NON- STANDARD MS4s
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A. Program Perspective: The goal of the Public Education and Outreach Program is to educate the users of the permitted facilities to promote a reduction in pollutants in stormwater runoff and to help prevent illicit discharges.

B. Permit Requirements

The permittee must implement a program to educate the public that uses their facilities. The program must include outreach activities about steps that the public can take to reduce pollutants in stormwater runoff and illicit discharges from the permittee's facilities. Pollutant sources targeted must include those actually present at the facilities, which may include items such as pet waste, litter, disposal of items such as oil to the ground or storm sewers, etc.

The permittee must meet the following minimum requirements:

- a) *Target the following specific populations, if present:*
 - i) *General Public: Educate the general public that uses the facilities on stormwater pollutant sources and illicit discharges they may produce while using those facilities. Examples include disposal of litter and picking up pet waste.*
 - ii) *Tenants: Educate any commercial or industrial tenants, such as vendors, stores, and restaurants, that operate within the permitted area about their stormwater pollution sources and illicit discharges. Examples of activities to address include proper disposal of waste and good housekeeping practices.*
- b) *Document the specific populations listed in subsection (a) above that are covered, and the outreach activities that will be conducted during the permit term.*
- c) *Implement specific activities and maintain materials, such as web pages, signs, etc, to ensure implementation of the outreach activities.*

C. Program Elements: Address both new and existing education programs, including those developed during the first permit term that you will continue to implement/maintain. 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.

Complete a separate table, below, for each public education program implemented. Add additional tables, as necessary. For each program, provide the following information:

- i) **Target Audience:** What specific audience will be reached by the education programs? For example, a program to promote picking up dog waste may target residents if brochures are distributed to homes, or target dog walkers if signs are posted in parks. If tenants are present at the permitted facility, at least one program element must address pollutants associated with those tenants.

Are tenants present at the permitted facility, such as vendors, stores, or restaurants?

☐ **NO**

☒ **YES:** Include at least one program element in a table below that addresses pollutant sources associated with the tenants. Examples include providing education on used oil disposal for vendors or preventing discharges of power washing water from cleaning sidewalks and awnings of stores.

ii) Pollutant Sources Addressed: *Make an assessment of what sources of stormwater pollution may be present at your permitted facilities. Education program must address pollutant sources actually present at your facilities. List the pollutant sources that will be addressed by each education program. For example, a program to mark storm sewer inlets with “Drains to Creek” signs would address illegal dumping of waste. Other sources may include litter, pet waste, used fryer oil from restaurants/vendors, fertilizer and yard waste from residents, etc.*

iii) Specific Activities Conducted: *Briefly describe the specific activities that will be conducted, including dates when applicable, or state that the program is ongoing. For example:*

- *“Distribute brochures on proper waste disposal to all tenants in 2009”*
- *“Maintain existing web site: ongoing”*
- *“Maintain existing stenciling on all storm sewer inlets stating ‘Do not Dump, Drains to Creek’: ongoing”*
- *“Conduct stream cleanup day with students/public, annually starting in 2010”*

iv) Educational Materials/Resources Maintained: *List the materials that will be maintained for the program. Examples include brochures, trail signs, inlet markers/stencils, web pages, billboards, etc.*

1. Public Education Program Name: SEMSWA One Page Annual Report Insert	
i) Target Audience:	<i>residents, homeowners, businesses</i>
ii) Pollutants Addressed:	<i>sediment; urban runoff (trash, illegal dumping/illicit discharges, nutrients from lawn care, bacteria from pet waste); phosphorous</i>
iii) Specific Activities Conducted: <i>Provide years for implementation, or state “ongoing”</i>	<i>Mail or email SEMSWA Annual Report to billing customers within Arapahoe County Water and Wastewater Authority, Inverness Water and Sanitation District, and East Cherry Creek Valley Water and Sanitation District. Ongoing</i>
iv) Educational Materials/Resources Maintained: <i>Provide dates for development, or state “ongoing”</i>	<i>Ongoing</i>

2. Public Education Program Name: Event Participation	
i) Target Audience:	<i>Residents in Arapahoe County and Douglas County</i>

ii) Pollutants Addressed:	sediment; urban runoff (trash, illegal dumping/illicit discharges, nutrients from lawn care, bacteria from pet waste); phosphorous
iii) Specific Activities Conducted: <i>Provide years for implementation, or state “ongoing”</i>	Have a booth at a minimum of one event per year.
iv) Educational Materials/Resources Maintained: <i>Provide dates for development, or state “ongoing”</i>	Ongoing

3. Public Education Program Name: SPLASH Activities; DC Clear Activities	
i) Target Audience:	<i>Residents in Arapahoe County, Douglas County MS4 staff</i>
ii) Pollutants Addressed:	sediment; urban runoff (trash, illegal dumping/illicit discharges, nutrients from lawn care, bacteria from pet waste); phosphorous
iii) Specific Activities Conducted: <i>Provide years for implementation, or state “ongoing”</i>	Through SPLASH and DC Clear, support events, development of educational materials, and lunch and learns for MS4 staff.
iv) Educational Materials/Resources Maintained: <i>Provide dates for development, or state “ongoing”</i>	Ongoing

4. Public Education Program Name: Cherry Creek Stewardship Partners Activities	
i) Target Audience:	<i>Residents in Arapahoe County, Douglas County</i>
ii) Pollutants Addressed:	sediment; urban runoff (trash, illegal dumping/illicit discharges, nutrients from lawn care, bacteria from pet waste); phosphorous
iii) Specific Activities Conducted: <i>Provide years for implementation, or state “ongoing”</i>	Through the Cherry Creek Stewardship Partners, support events and development of educational materials.
iv) Educational Materials/Resources Maintained: <i>Provide dates for development, or state “ongoing”</i>	Ongoing

D. Measurable Goals

No new permit requirements are included for the Public Education and Outreach Program. Therefore, 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.

MS4 NAME	PUBLIC PARTICIPATION / INVOLVMENT	STORMWATER DISCHARGES ASSOCIATED WITH NON- STANDARD MS4s
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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

The permittee must provide a mechanism and processes to allow for ongoing public and staff review and input of the CDPS Stormwater Management Program.

The permittee must meet the following minimum requirements:

- a) *Implement processes to ensure public feedback and information requests are directed to the proper permittee contacts, documented, and responded to as appropriate.*
- b) *Provide one or more of the following feedback mechanisms:*
 - i) *Publish and maintain a web page providing information on the permittee's CDPS Stormwater Management Program, including directions for providing feedback.*
 - ii) *Publish and distribute, or post in a public place, notice of the permittee's CDPS Stormwater Management Program and directions for obtaining more information and providing feedback.*

C. Program Elements: Address both new and existing education programs, including those developed during the first permit term that you will continue to implement/maintain. 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.

Check all of the methods below that you use to publicize contact information and direct inquiries to appropriate staff. Provide the required additional information for reach method checked.

<input checked="" type="checkbox"/> Web Page: Maintain a web page that briefly describes your CDPS Stormwater Management Program and provides contact information for staff and/or contractors that can respond to public inquiries/comments.	
Year of Implementation (or list as "ongoing"):	Ongoing
Web Address for page (if already implemented):	www.semswa.org

<input checked="" type="checkbox"/> Brochures: Distribute brochures that provide contact information for staff and/or contractors that can respond to public inquiries/comments. Brochures must be readily available to the general public and tenants that use your facilities.	
Year of Distribution (or list as “ongoing”):	Ongoing
Location of Distribution (e.g. mailed, place in public areas, etc.):	Printed materials about stormwater are available at events and at the SEMSWA office.

<input checked="" type="checkbox"/> Signage/Public Postings: Post information that provides contact information for staff and/or contractors that can respond to public inquiries/comments. All postings must be in locations readily available to the general public and tenants that use your facilities.	
Year(s) of Posting (or list as “ongoing”):	Ongoing
Method of Posting (e.g. mailed, place in public areas, etc.):	SEMSWA implements a water quality signage program that includes requirements for construction site signage on SEMSWA projects.

<input type="checkbox"/> Alternative Contact Information Distribution: Provide contact information for staff and/or contractors that can respond to public inquiries/comments in a publication readily available to the general public and tenants that use your facilities. Examples include contact directories, yellow pages, event calendars that are widely distributed (e.g., calendars distributed by school districts), regularly distributed newsletter with contact information, etc.	
Year(s) of Distribution (or list as “ongoing”):	
Publication used:	

<input checked="" type="checkbox"/> Other Method(s): Describe any additional/alternative methods used to provide contact information for staff and/or contractors that can respond to public inquiries/comments.	
Description of Method(s) Used:	SEMSWA main phone number is published on outreach materials.
Year(s) of Distribution and/or Implementation (or list as “ongoing”):	Ongoing

D. Measurable Goals

No new permit requirements are included for the Public Education and Outreach Program. Therefore, 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.

MS4 NAME	ILLICIT DISCHARGE DETECTION AND ELIMINATION	STORMWATER DISCHARGES ASSOCIATED WITH MS4s
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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 below, into the permittee's MS4. Illicit discharges do not include discharges or flows from emergency fire fighting activities, or other activities specifically authorized by a CDPS permit.

The permittee must meet the following minimum requirements:

- a) *Develop and maintain a current storm sewer system map, showing the location of all of the permittee's storm sewer outfalls and the names and location of all state waters that receive discharges from those outfalls.*
- b) *Develop, document, and implement a plan to detect and address illicit discharges to the system. The plan must include:*
 - i) *Procedures for tracing the source of an illicit discharge;*
 - ii) *Procedures for removing the source of the discharge, including procedures to refer discharges to a city or county for enforcement when appropriate; and*
 - iii) *Procedures to document occurrences of illicit discharges and how they were responded to.*
- c) *Develop and implement a program to train permittee staff to recognize and appropriately respond to illicit discharges observed during typical duties. The program must address who will be likely to make such observation and therefore receive training, and how staff will report observed suspected illicit discharges.*

Illicit Discharges include any discharge to an MS4 that is not composed entirely of stormwater, except:

- *Discharges specifically authorized by a CDPS permit.*
- *Discharges resulting from emergency fire fighting activities.*
- *the following categories of non-stormwater discharges or flows, unless 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.*

- *occasional incidental non-stormwater discharges similar to those in the above paragraph, (e.g., non-commercial or charity car washes, etc.) as determined and documented by the permittee, if approved by the Division, These nonstormwater 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 waterbodies, 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.*

C. Program Elements: Address both new and existing education programs, including those developed during the first permit term that you will continue to implement/maintain. 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.

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

Outfall Maps are complete. After new permanent BMP features are As-Built and accepted the GIS map is updated with the information. Outfalls are mapped in one of the following ways: as-constructed data is converted to GIS data or field GPS points are converted into the GIS database.

2. Illicit Discharge Detection and Elimination Plan –Briefly describe plans and procedures in place for the following required actions:
 - Tracing the source of illicit discharges
 - Removing the source of illicit discharges
 - Documenting occurrences of illicit discharges and how they were responded to.

Add Description Here

The Arapahoe County IDDE Manual (Manual) was developed and implemented in 2005. The Manual is designed to outline procedures for tracing the source, and removing the source of illicit discharges within the County, and how to document and respond to illicit discharges. It also includes guidance for tracking illicit discharges.

- Tracing the source of an illicit discharge is dependent on the type of discharge. The outfall map is generally sufficient to trace illicit discharges. If the discharge cannot be traced through the outfall map, other tracking options such as manhole observation, video inspection, smoke testing, dye testing, aerial infrared and thermal photography can be used if SEMSWA feels it is valuable.
- Because there are various sources of illicit discharges to the storm sewer system, there are different kinds of actions SEMSWA takes to remove those sources and prevent future illicit discharges. SEMSWA groups those actions into three categories: compliance assistance and enforcement for illegal connections to homes and businesses; proper construction and maintenance of MS4s; and responding to and preventing illegal dumping.

- SEMSWA documents illicit discharges and how they were responded to in an internal database.

An SOP with Arapahoe County details who is responsible for response and enforcement of illicit discharges within the County. Illicit discharges within Douglas County are addressed through Douglas County's IDDE Program

3. Staff/Contractor Education – List program(s) to educate appropriate staff and contractors 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., classroom, 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

SEMSWA provides training to SEMSWA staff about the Stormwater Program. The training generally consists of how to identify and respond to illicit discharges. The Visual Observation Program (VOP) is described below.

IDDE VOP

The VOP is broken into two categories, a general VOP and VOP for Field Staff. The general VOP is offered to all staff who drive a service vehicle and have the opportunity for a visual, albeit casual, drive-by visual observation of the drainageways. Staff is given basic training on the types of illicit discharges that may occur. The VOP for Field Staff is offered to staff that are in the drainageways for other purposes. The Field Staff are trained in the visual detecting of pollutants so that they can immediately intervene to prevent and help eliminate sources of impurities to the waterways. Training materials in the past have included the "Storm Warning" video, standard operating procedures (SOPs), fact sheets, and question and answer sessions.

D. Measurable Goals

The permit includes a new requirement to train staff and contractors on observing, reporting, and responding to illicit discharges. Measurable Goals are required, as per Part I.C of the permit, 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. A staff/contractor education program, as listed in Part C.3, above, has already been developed and implemented.
☒ **(It is not necessary to complete Part 3 below if you check this box.)**
2. A staff/contractor education program, as listed in Part C.3, above, has **NOT** already been fully developed and implemented and **I will comply with the following Measurable Goal.**
☐ **(You must complete Part 3 below if you check this box.)**

3. **Staff/Contractor Education Measurable Goal:** 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

<i>Add Description Here</i>

MS4 NAME	CONSTRUCTION SITES RUNOFF CONTROL	STORMWATER DISCHARGES ASSOCIATED WITH NON- STANDARD MS4s
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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 develop, document, and implement a program to reduce the discharge of pollutants to the MS4 from construction activities owned and/or operated by the permittee 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. The program must reduce pollutants in discharges of stormwater runoff and also reduce pollutants in, or prevent when required in accordance with the 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. The program must require adequate design, implementation, and maintenance of BMPs.

If the Division waives requirements for stormwater discharges associated with a small construction activity in accordance with Regulation 61.3(2)(f)(ii)(B) (the “R-Factor” waiver), the permittee is not required to develop, implement, and/ or enforce its Construction Sites program to reduce pollutant discharges from such a site.

The permittee program must meet either the requirements in Option 1, subsection (a), or the requirements in Option 2, subsection (b), below. The requirements of Option 1 must be met for any areas discharging to the Cherry Creek Reservoir Drainage Basin.

- a) **Option 1** - Develop, document, and implement a program to follow the requirements of a city and/or county local program(s). Under this option, the permittee would be in violation of this permit if they fail to comply with the local program(s). The following requirements must be met under this option:
 - 1) Document the local program(s) that will be followed for the permitted area. If different programs will be followed in different areas, this must be clearly described.
 - 2) Require compliance, through contracts or other enforceable mechanisms, with all requirements of the local program(s). Have procedures in place and documented to ensure that contractors and staff comply with the requirements. Procedures must include specific processes and sanctions to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.
 - 3) Submit construction plans and documentation for review by the local program(s), as required by those local programs.
 - 4) Allow for site inspections by the local program(s), as required by the local program.

- b) **Option 2** – Develop, document, and implement the permittee’s own program that meets all of the following requirements:
- 1) Require compliance, through contracts or other enforceable mechanisms, with all requirements of the program.
 - 2) Develop, document, and implement requirements for construction site operators to implement appropriate erosion and sediment control BMPs. The permittee must develop or reference specific design criteria for site planning and BMPs.
 - 3) Develop, document, and implement requirements for construction site operators to implement BMPs 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.
 - 4) Develop, document, and implement a Compliance Assessment program, including:
 - i) Procedures for site plan review which incorporate consideration of potential water quality impacts.
 - ii) Procedures for construction site compliance assessment, including:
 - A) site inspections; and
 - B) receipt and consideration of information submitted by the public.
 - iii) Procedures and mechanisms to track and provide the Annual Report information required in Part I.F.6(a) of the permit.
 - 5) Develop and implement a Compliance Assurance program, including:
 - i) Procedures for enforcement of control measures that include 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, obtain compliance from, chronic and recalcitrant violators of control measures.
 - ii) An education and training program for staff and contractors that includes, at a minimum, information for construction site operators unfamiliar with the program requirements.

C. Program Elements: Address both new and existing education programs, including those developed during the first permit term that you will continue to implement/maintain. 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.

The permit allows for two alternatives for complying with the requirements of the Construction Sites Program, as cited in Parts (a) and (b) of the “Permit Requirements” section, above. You are required to comply with one of these two requirements.

Check the box for either Option 1 or Option 2 to indicate which of the two alternative permit requirements will be complied with, and provide the required information in the table for the option chosen. Address the existing program elements, including those developed during the first permit term.

<input checked="checked" type="checkbox"/> Option 1 - Meet the requirements of I.B.3(a) of the permit: <i>“Develop, document, and implement a program to follow the requirements of a city and/or county local program(s). Under this option, the permittee would be in violation of this permit if they fail to comply with the local program(s).”</i>

<p>IT IS NOT NECESSARY TO COMPLETE THE INFORMATION IN THIS TABLE IF YOU CHOOSE “OPTION 2”, BELOW</p>	
<p><i>If Option 1 is selected, you must provide the following information:</i></p>	
<p>1. Local Program(s) to be Followed:</p>	<p>List below the City and/or County Program(s) that will be complied with. If multiple programs are listed, indicate which programs apply to which of your facilities/locations.</p> <p>Add list here: Arapahoe County; Douglas County</p>
<p>2. Contract/Regulatory Mechanism: You are required to have contracts or other enforceable mechanisms in place that require contractors to comply with the local program(s) listed in row 1, above.</p>	<p>Check the appropriate box (and provide a description if box (ii) is checked) to indicate the mechanism used to meet this requirement.</p> <p><input type="checkbox"/> i. The requirements are included in construction contracts.</p> <p><input checked="" type="checkbox"/> ii. An alternative mechanism is utilized, and is described below.</p> <p>Add description here if box ii is checked: All projects are required to go through the Land Use process in the County per land use requirements.</p>
<p>3. Processes and Sanctions: You are required to have a process to address contractors that are out of compliance with local programs. The process must minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.</p>	<p>Check the appropriate box (and provide a description if box (ii) is checked) to indicate the process used meet this requirement.</p> <p><input checked="" type="checkbox"/> i. Contractors are fully subject to the enforcement provisions and sanctions of the local program(s). For example, the contractor obtains permits and is subject to fines and stop work orders issued by the city or county. For areas within Douglas County</p> <p><input checked="" type="checkbox"/> ii. Contractor compliance is addressed by my agency (the permittee). The process implemented by my agency to obtain compliance is described below. For example, issuing monetary penalties or stopping work when contractors are found to be not in compliance with the local program. For areas within Arapahoe County.</p> <p>Add description here if box ii is checked: In accordance with GESC Requirements, an enforcement program comprised of the following enforcement tools; withholding permits, inspections, plan review, warning letter, letter of non-compliance, stop work orders, notice of violations, re-inspection fees, monetary fines, and summons are implemented by SEMSWA. Enforcement actions are escalated as needed, specifically with those sites with a past history of non-compliance. Procedures are developed (SOP 4.1 and SOP 4.2) which describe how enforcement procedures are fully implemented and outline implementation response procedures that specifically address compliance assurance.</p>

<p><input type="checkbox"/> Option 2 - Meet the requirements of I.B.3(b) of the permit: “Develop, document, and implement the permittee’s own program”</p>	
<p>IT IS NOT NECESSARY TO COMPLETE THE INFORMATION IN THIS TABLE IF YOU CHOOSE “OPTION 1”, ABOVE</p>	
<p><i>If Option 2 is selected, you must provide the following information:</i></p>	
<p>1. Contract/Regulatory Mechanism:</p>	<p>Check the appropriate box (and provide a description if box (ii) is checked) to indicate the mechanism used meet this requirement.</p>

You are required to have contracts or other enforceable mechanisms in place that require contractors to comply with your program	<input type="checkbox"/> i. The requirements are included in construction contracts.
	<input type="checkbox"/> ii. An alternative mechanism is utilized, and is described below.
	Add description here if box ii is checked:

Option 2 Table (continued)	
2. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and materials handling BMPs:	List below 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:
3. Requirements for construction site operators to control waste including discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste:	Describe below your process for requiring construction sites to implement BMPs to control waste such as discharged building materials, concrete truck washout, chemicals, litter, sanitary waste, and other non-stormwater discharges.
	Add description here:
4. Procedures for site plan review which incorporate consideration of potential water quality impacts:	<u>i. Site Plan Development:</u> Briefly describe below your requirements for construction site operators to develop stormwater control site plans based on the minimum design criteria
	Add description here:
	<u>ii. Site Plan Review:</u> Briefly describe below 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?)
	Describe how consideration of potential water quality impacts is achieved (e.g., stormwater permit required, which requires a plan, which requires that water quality impacts be considered; water quality impacts are required to be addressed by development code; etc.).
5. Procedures for consideration of information submitted by the public:	Add description here:
	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.
6. Procedures to Track Annual Reporting Requirements:	Add description here:
	Describe procedures used for tracking total number of construction sites covered, number of inspections performed, and enforcement actions.

Option 2 Table (continued)	
7. Procedures for site inspection and enforcement of control measures:	i. 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.
	Add description here:
	ii. Enforcement: Describe procedures used for enforcement, and list any manuals, response guides, or other documentation used by your staff that dictates how and when a response to non-compliance is carried out and how 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.
8. Training and Education for Staff and 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:

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.

MS4 NAME	POST-CONSTRUCTION STORMWATER MANAGEMENT	STORMWATER DISCHARGES ASSOCIATED WITH MS4s
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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

The permittee must develop, document, and implement a program to address stormwater runoff from the permittee's 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, following new development and/or redevelopment, permanent water quality controls are in place that would prevent or minimize water quality impacts.

The permittee program must meet either the requirements in Option 1, subsection (a), or the requirements in Option 2, subsection (b), below. The requirements of Option 1 must be met any areas discharging to the Cherry Creek Reservoir Drainage Basin.

- a) ***Option 1*** - Develop, document, and implement a program to follow the requirements of the city and/or county program(s) (local program(s)). Under this option, the permittee would be in violation of this permit if they fail to comply with the local program(s). The following requirements must be met under this option:
 - 1) *Document the local program(s) that will be followed for the permitted area. If different programs will be followed in different areas, this must be clearly described.*
 - 2) *Require that permanent water quality controls are developed and implemented in compliance with all requirements of the local program(s).*
 - 3) *Ensure the long-term operation and maintenance of permanent water quality controls, in accordance with the local program(s).*
 - 4) *Submit construction and long-term operation and maintenance plans and documentation for review by the local program(s), as required by those local programs.*
 - 5) *Allow for site inspections, both during construction and following construction, by the local program(s), as required by the local program.*

- b) ***Option 2*** - Develop, document, and implement the permittee's own program that meets all of the following requirements:
 - 1) *Develop, document, and implement strategies which include the use of structural and/or non-structural BMPs for new development and redevelopment projects. The BMPs shall address the discharge of pollutants, and/or maintain or restore hydrologic conditions at sites, to minimize the discharge of pollutants and prevent in-channel impacts associated with increased imperviousness. The permittee must develop or reference specific design criteria for selection, implementation, and maintenance of controls.*

- 2) *Develop, document, and implement procedures to review post-construction BMP plans and designs prior to construction to ensure compliance with the requirements in subparagraph (1), above.*
- 3) *Develop, document, and implement procedures, including inspections, to determine if the controls required under subparagraph (1), above, are being installed according to specifications.*
- 4) *Develop, implement, and document procedures to ensure adequate long-term operation and maintenance of controls, including inspection procedures for all controls.*
- 5) *Develop, document, and implement procedures and mechanisms to track long-term BMPs implemented in accordance with the program. Tracking must address the location and the adequacy of long term operation and maintenance activities for the BMPs.*
- 6) *Develop, document, and implement procedures and mechanisms to track and provide the Annual Report information required in Part I.F.6 (b) of the permit.*

C. Program Elements: Address both new and existing education programs, including those developed during the first permit term that you will continue to implement/maintain. 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.

The permit allows for two alternatives for complying with the requirements of the Post-Construction Stormwater Management Program, as cited in Part (a) and (b) of the “Permit Requirements” section, above. You are required to comply with one of these two requirements.

Check the box for either Option 1 or Option 2 to indicate which of the two alternative permit requirements will be complied with, and provide the required information in the table for the option chosen. Address the existing program elements, including those developed during the first permit term.

<input checked="" type="checkbox"/> Option 1 - Meet the requirements of I.B.4(a) of the permit: <i>“Develop, document, and implement a program to follow the requirements of the city and/or county program(s) (local program(s)). Under this option, the permittee would be in violation of this permit if they fail to comply with the local program(s).”</i>	
IT IS NOT NECESSARY TO COMPLETE THE INFORMATION IN THIS TABLE IF YOU CHOOSE “OPTION 2”, BELOW	
<i>If Option 1 is selected, you must provide the following information:</i>	
1. Local Program(s) to be Followed:	List below the City and/or County Program(s) that will be complied with. If multiple programs are listed, indicate which programs apply to which of your facilities/locations.
	Add list here: Arapahoe County; Douglas County

<input type="checkbox"/> Option 2 - Meet the requirements of I.B.3(b) of the permit: <i>“Develop, document, and implement the permittee’s own program”</i>	
IT IS NOT NECESSARY TO COMPLETE THE INFORMATION IN THIS TABLE IF YOU CHOOSE “OPTION 1”, ABOVE	
<i>If Option 2 is selected, you must provide the following information:</i>	
1. Design Criteria and Standards:	List below 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:
2. Review and Approval Procedures:	i. <u>Plan Review:</u> Briefly describe below your process for review and approval of permanent water quality control plans. Describe your system to track status of plans.
	Add description here:
	ii. <u>Field verification:</u> Describe below how the correct installation of BMPs is confirmed, and the enforcement procedures used when BMPs have not been built as approved.
	Add description here:
3. Tracking:	Describe below how permanent BMP locations and maintenance history are tracked.
	Add description here:
4. Ensuring long-term operation and maintenance of BMPs	Describe below your procedures to ensure BMPs are maintained in operating condition.
	Add description here:
5. Monitoring long-term compliance:	Describe below your inspection programs, including routine and complaint response inspections.
	Add description here:
6. Procedures to Track Annual Reporting Requirements:	Describe below procedures used for tracking total number of sites for which BMPs were required, number of sites/BMPs inspected to ensure compliance with long-term maintenance and operation requirements, and types of enforcement actions used.
	Add description here:

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.

MS4 NAME	POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	STORMWATER DISCHARGES ASSOCIATED WITH MS4s
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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 from the operations conducted by or for the MS4.

B. Permit Requirements

The permittee must develop and implement an operation and maintenance program that includes a training component for employees, and contractors when applicable, and has the ultimate goal of preventing or reducing pollutants in runoff from the operations conducted by or for the permittee. The program must also inform employees/contractors of impacts associated with illegal discharges and improper disposal of waste from the permittee's operations. The program must prevent and/or reduce stormwater pollution from the permittee's facilities, or their contracted facilities located within the permitted area, such as streets, roads, parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas, and waste transfer stations, and from the permittee's, and/or their contractors', activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of facilities, and stormwater system maintenance, as applicable.

The permittee must:

- a) 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 operations. The program must specifically list the operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The program must also include a list of any 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;*
- b) develop and implement procedures to provide training to employees and contractors as necessary to implement the program under Item 1, above.*

C. Program Elements: Address both new and existing education programs, including those developed during the first permit term that you will continue to implement/maintain. 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.

1. Implementation of an operation and maintenance program - [Describe your Pollution Prevention and Good Housekeeping program.](#)

<i>Add Description Here</i>
The Program 6 Procedures Manual applies to (1) all owned or leased properties presently utilized by SEMSWA for municipal operations, as well as future facilities to be owned or leased; (2) all

municipal operations performed by SEMSWA itself, and (2) all new construction that SEMSWA conducts itself or is conducted on behalf of SEMSWA by a contractor.

A runoff control plan (RCP) was developed for the SEMSWA facility. As other buildings are leased or constructed to conduct SEMSWA business, they are evaluated to determine if an RCP is needed. The RCP document describes pollution prevention BMPs for the facility and SOPs for the operational areas and/or activities that could contribute to stormwater pollution.

Audits of the RCPs are conducted to ensure the program is implemented at the site. SOPs have been prepared for municipal operations of interest. As operational activities change, new SOPs are written and existing SOPs are updated.

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

Add Description Here

The employee education and training programs provide education related to components of RCPs and the SOPs related to each employee's job function. The education program is implemented in various ways—through short presentations at periodic safety meetings; by posting good housekeeping signs, where allowed and appropriate; and/or by providing specific training sessions for employees on the use of the RCP document and operational area SOPs.

Some of the specific training and educational efforts include the following:

- Training employees and management regarding inappropriate non-stormwater discharges.
- Training on RCP and SOPs
- Training and signage (as allowed and appropriate) regarding proper spill reporting procedures including the use of spill kits and drip pans
- Signage and visible instructions throughout the facility (e.g. spill kit locations, no dumping, etc.) where allowed and appropriate
- Log of employee RCP and SOP training

D. Measurable Goals

The permit includes a new requirement to develop written procedures for the operation and maintenance program. The previous permit required that the program be implemented, but did not specifically require written procedures. Measurable Goals are required, as per Part I.C of the permit, 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, as listed in Part C.1, 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 and I **will comply with the following Measurable Goal.**

☐

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

3. **Pollution Prevention/ Good Housekeeping Measurable Goal:** 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.

<i>Add Description Here</i>