

STORMWATER MANAGEMENT PLAN

In accordance with the
Arizona Pollutant Discharge Elimination System
General Permit for Stormwater Discharges
From Small Municipal Separate Storm Sewer Systems
Permit No. AZG2016-002
Issued on: September 30, 2016



City of Prescott
430 N Virginia Street
Prescott, AZ 86301

DRAFT Updated
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1.0 REGULATORY PROGRAM INFORMATION

Phase I of the U.S. Environmental Protection Agency's (EPA) municipal stormwater program was promulgated in 1990 under the authority of the Clean Water Act (CWA). Phase I relied on the National Pollutant Discharge Elimination System (NPDES) permit coverage to address stormwater runoff from medium and large municipal separate storm sewer systems (MS4s), serving populations of 100,000 or greater.

The Stormwater Phase II Final Rule (promulgated December 8, 1999) was the next step in the EPA's efforts to preserve, protect, and improve the nation's water resources from polluted stormwater runoff. The Phase II program requires additional operators (small MS4s in urbanized areas) to implement programs and practices to control polluted stormwater runoff, through the NPDES permit program. Recently, the State of Arizona has received primacy for the federal NPDES program and is charged with implementing the program, now called AZPDES. The program requires Phase II municipalities to develop a Stormwater Management Program/Plan (SWMP). The current AZPDES permit can be found in Attachment L.

The City of Prescott (City, COP) must develop and implement a SWMP as required by the Arizona Department of Environmental Quality's (ADEQ) Arizona Pollutant Discharge Elimination System (AZPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) to Waters of the United States No. AZG2016-002 (Permit). The Permit was issued by ADEQ effective on September 30, 2016 and supersedes Permit No. AZG2002-002 issued by ADEQ on December 19, 2002.

This SWMP has been developed in accordance with 40 CFR Part 122; Arizona Revised Statutes (ARS) Title 49, Chapter 2, Article 3.1; and Arizona Administrative Code (AAC) Title 18, Chapter 9, Articles 9 and 10. The SWMP has been prepared to meet the requirements identified Permit section 5.1 and is certified according to Permit section 9.9.

This SWMP outlines the City's program to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP), to protect water quality, and to satisfy the appropriate requirements of the Clean Water Act (CWA) in accordance with ADEQ's Stormwater Phase II program. This goal is achieved through implementing six minimum control measures (MCMs):

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination (IDDE) Program
- Construction Activity Stormwater Runoff Control
- Post-Construction Stormwater Management
- Pollution Prevention and Good Housekeeping

The SWMP is designed to be a comprehensive program document outlining how the stormwater program is implemented and maintained, therefore, additional sections have been added to address:

- Fiscal Resources

- Legal Authority
- MS4 Mapping
- Monitoring
- Reporting
- Program evaluation and revision
- Signatory Requirements

• **Table 7 –Summary ofProgram Management Requirements**

Reporting and Assessment	Frequency	Timeframe
Annual Report	Annually	September 30
Self-Evaluation	Annually	September 30
Discharge Monitoring Reports	Annually	September 30
Storm Sewer System Mapping – Keep maps current	Update as new stormwater systems come online	Ongoing
Enforcement Response Plan – Develop the Enforcement Response Plan addressing illicit discharge, construction site and post construction site program enforcement.	Implement ongoing	Within 24 months of obtaining coverage

2.0 SETTING

The City of Prescott was incorporated in 1883 and the Prescott City Charter was adopted as the “constitution” in 1958. Prescott covers 41.3 square miles in the mountains of north central Arizona, approximately 96 miles north of Phoenix. Prescott, the county seat of Yavapai County, is located near the towns of Chino Valley, Prescott Valley and Dewey/Humboldt. Taken together the local municipalities are locally referred to as the Quad Cities region. The City is located at Latitude N34° 32' 23.9" and Longitude W112° 28' 4.3" and is approximately 5,400 feet above sea level. The local climate is mild with an average summer temperature of 80°F and an average winter temperature of 57°F. Annual precipitation averages approximately 19 inches per

year, 11 inches per year as snowfall. The City of Prescott has experienced steady growth over the past few decades, increasing from 16,888 in 1975 to 39,843 in 2010 (964 people per square mile).

3.0 EXISTING STORMWATER SYSTEM

The City's stormwater system is comprised of a system of municipally owned or operated curbs, gutters, inlets, catch basins, underground pipes, detention basins, natural washes and man-made channels. The Public Works Department is responsible for the maintenance, design, and construction of streets and drainage facilities and infrastructure. Divisions within the Department are responsible for various aspects of construction, inspection, and maintenance. The Streets Division handles runoff management, street drainage system maintenance, and street maintenance. The Utilities Division, maintains the sanitary sewer system.

4.0 RECEIVING WATERS

Prescott is located in the Upper Granite Creek Watershed which is mostly mountainous. Several tributaries feed Watson Lake Reservoir and Willow Creek Reservoir which discharge into Granite Creek to the northeast and ultimately into the Verde River. The City's MS4 discharges to thirteen impaired or not-attaining waters.

Table 8 – COP MS4 Receiving Waters

Water Body	Cause of Impairment	Number of Outfalls	TMDL
Watson Lake Reservoir	Nitrogen, low dissolved oxygen, high pH	12	Yes (N, P, DO, pH)
Willow Creek Reservoir	Ammonia	6	No
Granite Creek	E. Coli, low dissolved oxygen	70	Yes (E. coli; Watershed TMDL) No (DO)
Miller Creek	E. Coli	22	Yes (Watershed TMDL)
Butte Creek	E. Coli	27	Yes (Watershed TMDL)
Manzanita Creek	E. Coli	4	Yes (Watershed TMDL)
North Fork Granite	E. Coli	17	Yes (Watershed TMDL)
North Fork Miller	E. Coli	6	Yes (Watershed TMDL)
Aspen	E. Coli	16	Yes (Watershed TMDL)
Slaughterhouse Gulch	E. Coli	1	Yes (Watershed TMDL)
Government Canyon Wash	E. Coli	3	Yes (Watershed TMDL)
Virginia Street Wash	E. Coli	43	Yes (Watershed TMDL)
Yavapai College Wash	E. Coli	7	Yes (Watershed TMDL)
Willow Creek	No impairment	19	N/A
Upper and Lower Goldwater Lake	No impairment	3	N/A
Total	13 impaired	289	

5.0 LEGAL AUTHORITY

In 2007, Prescott amended the City Code, adding a section regarding stormwater regulations (Title XVI Street and Utility and Drainage Regulations). Prescott manages stormwater runoff through the enactment of its ordinance to control construction site erosion and sediment, enforce illicit discharges and illegal connections, and manage construction and post-construction stormwater runoff to the MS4. The City's General Engineering standards, adopted as City Code in 2016, governs all private and City infrastructure improvements. Prescott City Code, Land Development Code, and General Engineering Standards are available online at <https://www.codepublishing.com/AZ/Prescott/>.

5.1 ENFORCEMENT

To comply with the Permit, the City has created an Enforcement Response Plan (ERP). The ERP outlines the procedures the City designees will follow to enforce its stormwater ordinance. Escalation measures presented in the ERP are briefly described below, and the ERP is available in Attachment C.

The City applies escalating enforcement action depending on the severity of the violation and the violator's willingness to comply. The enforcement steps used achieve compliance with the ordinance are listed below in order:

1. A verbal warning or written Notice of Correction / Maintenance Notice
2. Violation Notice.
3. City Code Violation Citation.
4. The liable party then has the right to appeal the ticket at a City Court Hearing. The Violation Ticket is not to exceed \$2,500, per violation, per day. In addition, if found guilty they will be liable to any associated costs to remedy the situation.

If the violator takes insufficient actions, the City may proceed with its abatement process as described in the City Code. The City will perform the minimum corrective actions to restore compliance and the violator will be responsible for the associated costs to reimburse the City.

6.0 MS4 MAPPING

The City Information Technology (IT) Department maintains a Geographic Information System (GIS) database of all City owned or maintained infrastructure, including stormwater drainage infrastructure. GIS updates are coordinated with Public Works and occur regularly as infrastructure is built or modified and when historic infrastructure or mapping inconsistencies are identified. The City's stormwater drainage map includes:

- Receiving waters;
- Outfalls;
- Surface and subsurface conveyances;
- Detention basins, Green Infrastructure, and other stormwater controls;

- Aerial imagery;
- Topographic data;
- and Street maintenance data.

Newly constructed storm drain infrastructure features are digitized as construction As-Built plans are submitted to the City. Due to the abundance of aging infrastructure and large number of water bodies that flow through the City, outfalls are regularly discovered and mapped during inspections and IDDE investigation. Outfalls may be removed if they are privately owned, do not discharge to jurisdictional waters, or are otherwise not regulated by the MS4 permit.

7.0 MINIMUM CONTROL MEASURES

The MS4 permit requires implementation of six Minimum Control Measures (MCM):

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination (IDDE) Program
4. Construction Activity Stormwater Runoff Control
5. Post-Construction Stormwater Management
6. Pollution Prevention and Good Housekeeping

Each MCM is described in more detail in the following sections and includes a number of Best Management Practices (BMPs) selected by the City to reduce stormwater pollutants as well as the department responsible for each BMP.

7.1 MCM-1: Public Education and Outreach

MCM 1 requires implementation of a public education and outreach program intended to increase knowledge and change behavior of the public to reduce stormwater pollution. The City has identified education and outreach opportunities that utilize a variety of media outlets with the objective of reaching diverse communities in and around the MS4.

Table 1 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Public Education and Outreach minimum control measure. A summary of these BMPs is provided below.

Table 1 – Public Education and Outreach BMPs

BMP Name (Frequency)	BMP Responsibility and Description	Measurable Goals (Audience)
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BMP Name (Frequency)	BMP Responsibility and Description	Measurable Goals (Audience)
<p>Print Materials 1 per year minimum</p>	<p>Public Works Department City will use print materials to inform residents of common pollutants and pollutants observed in their neighborhood. Discuss distribution methods, specific audiences.</p>	<p>-Contact representative individuals for interest in participation. -Record number of yearly outreach efforts and result. (Public)</p>
<p>Municipal Website Information 1 per year minimum</p>	<p>Public Works and Information Technology City will use website to provide residents with year-round access to this SWMP, recent Annual Reports, and NOI. Website will also contain general stormwater information and fact sheets. City will update City of Prescott webpage to increase amount of useful information to residents and businesses on how to reduce pollution and mitigate stormwater runoff. Webpage updates may include Frequently Asked Questions, resources for stormwater quality management and news on stormwater programs at the City.</p>	<p>-Update website with links to current documents. -Record number of visitors to site each year. (Public)</p>
<p>Storm Drain Markers</p>	<p>Public Works Department Install or replace “Drains to Creek” Storm Drain markers as needed and document installation. City partnership with Prescott Creeks on 2007 project (funded by ADEQ 319 grant) developed and placed “Rain Only Drains To Creek” markers for placement on storm drains. City staff have identified that new drain grates do not have markers and some original markers are damaged.</p>	<p>Marker placement will be focused on the downtown area due to its high visibility, close proximity to Granite Creek, and high concentration of commercial operations. (All Residents)</p>

BMP Name (Frequency)	BMP Responsibility and Description	Measurable Goals (Audience)
Dog Waste Dispensers	<p>Public Works Department</p> <p>Distribute and track distribution of dog waste dispensers at all events and at other sites as identified by staff.</p> <p>Provide dog waste dispensers to event participants: this allows us to educate participants about the impact of feces on water quality and the importance of properly disposing of pet waste. In addition to distributing dog waste dispensers also provide temporary signage to popular dog walking areas where waste accumulation is a regular occurrence.</p> <p>Add signage to all recreation trailhead bag dispensers to emphasize the need for proper waste disposal.</p> <p>Outreach to Homeowners Associations will also include education on waste disposal.</p>	<p>Number of dog waste dispensers handed out.</p> <p>Number of Temporary Sign requests and resolutions.</p> <p>(Pet Owners)</p>
School Event	<p>Present at schools: Prescott college, Yavapai College, Embry Riddle, etc.</p> <p>Develop presentation for classes that raises awareness of water quality issues and encourages participation.</p> <p>Continue to pursue outreach opportunities with local students and schools. Target two groups, either classes or student-aged groups like Scouts, 4H, etc.</p>	<p>October and November 2018 begin contacting schools and instructors directly to schedule presentations. Presentations to occur as course schedules permit.</p> <p>(Schools and Universities)</p>
Special Events	<p>Participate in five or more events with MS4 stormwater outreach materials.</p> <p>Participate in special events hosted by various local organizations. These special events provide opportunities to educate the general public and special interest groups on the importance of stormwater quality management.</p>	<p>(General Public)</p>

BMP Name (Frequency)	BMP Responsibility and Description	Measurable Goals (Audience)
Local PSAs	Utilize various media and social media platforms to diversify sources of pollution prevention and reporting information.	Diversify outreach across multiple platforms, specifically using the City website, social media accounts, newspaper, and local radio. Track reach where possible. (General Public)

7.2 MCM-2: PUBLIC INVOLVEMENT AND PARTICIPATION

MCM 2 requires the City to provide the public with an opportunity to review and implement this Stormwater Management Plan. The City encourages residents, visitors, businesses, and other members of the general public to engage in any of the BMPs described below and is always accepting input on additional measures to minimize stormwater pollutants.

Responsible Department: Public Works Department

Table 2 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Public Participation/Involvement minimum control measure. A summary of these BMPs is provided below.

Table 2 – Public Involvement and Participation BMPs

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Public involvement in SWMP review Annual	Public Works Department The City will provide the public an opportunity to participate in reviewing its Stormwater Management Program. The City will consider input provided by the public in its annual program update.	Documented efforts to engage the public in program review.
Implement Public Notice 1 per SWMP update	Public Works Department The City will comply with state and local public notice requirements when implementing the SWMP.	Document public notice efforts.
Stormwater Volunteer Opportunities 1 per year minimum	Public Works Department The City will provide opportunities for volunteers to participate in stormwater activities.	Record number of participants and type of volunteer activity.

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
<p>Procedure for Receiving and Reviewing Public Comment Ongoing as complaints are received</p>	<p>Public Works Department The City will investigate complaints submitted via telephone or website.</p>	<p>-Document the number of telephone and website complaints regarding stormwater related issues. -Document number of problems/incidents resolved -Respond within 24 hours or as soon as practicable for most complaints.</p>
<p>SWMP Availability</p>	<p>The City's Stormwater Management Plan will be made available to interested parties both in person at Public Works department or online, through the City's Webpage.</p>	<p>SWMP available continually online. At end of reporting year get a web page count to indicate how many people have looked at it.</p>
<p>ECC Training</p>	<p>The City will research the feasibility of hosting a training for the ADOT Erosion Control Coordinator certification. Number of participants (municipal and private sector employees) will be logged. If determined to be possible within budgeting and scheduling constraints, the City will host an ECC training. City stormwater staff would extend the professional development opportunity other City personnel that may be in a position to identify erosion and sediment control issues at construction sites. This training would also be available to the public and the City would invite local contractors to participate in an effort to improve awareness of sediment pollution issues in the industry.</p>	
<p>Web Reporting</p>	<p>The City will encourage reporting of illicit discharge and other surface water quality concerns through the City's online pollution reporting form available at https://prescott.seamlessdocs.com/f/jne0gewbgs7d.</p>	<p>Record increased number of submissions to COP pollution reporting form. Plug pollution reporting form via traditional and/or social media and radio interview. Aim to increase submissions to forms through enhancing public awareness of pollution and advertising availability of reporting form.</p>

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Watershed Improvement Council	<p>Reconvene WIC to enhance collaboration between government, private sector, independent sector, and individual stakeholders. Survey WIC members to identify stakeholder needs and develop direction for collaborative efforts.</p> <p>The Watershed Improvement Council remains the most significant agent of change in both the Granite Creek Watershed and Watson Lake TMDLs. As such the City will reconvene the group again to maintain the open channels of communication. Inclusion of private industry will also happen in an effort to represent the private/public connection relative to stormwater quality. Based on the discussions at that meeting, the City will pursue a collaborative project.</p>	Measuring the performance of the WIC will depend on collective goals set by the Council.
Granite Creek Corridor Revitalization Committee	<p>The Granite Creek Corridor Master Plan is anticipated to be completed in the Fall of 2019. The City will pursue grant and internal funding options to address the desired improvements. Water quality outreach, improved ecological function, and stormwater treatment are anticipated to be among those improvements.</p>	
Granite Creek Cleanup	<p>Coordinate with Prescott Creeks to gather volunteers to clean up creeks throughout watershed.</p>	

7.3 MCM-3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

MCM 3 requires the City to develop and implement a program to identify and eliminate illegal contributions of pollutants to the MS4 as well as unauthorized connections to the storm drain system. To effectively implement its IDDE program, the City relies on reports from citizens and staff across all departments to identify violations. City stormwater staff investigate these reports and determine appropriate enforcement and mitigation actions. Illicit discharges and connections are also identified through dry weather outfall screenings, wet weather outfall monitoring, and construction and post-construction stormwater controls inspections (part of MCMs 4 and 5). IDDE investigation and enforcement practices are detailed in Attachment J, IDDE Standard Operating Procedures and Attachment C, Enforcement Response Plan.

The Streets Division is responsible for the day-to-day maintenance of approximately 400 lane-miles of paved streets and the various drainage structures and bridges around the City. This includes patching and crack sealing, minor repairs, street sweeping, snow removal, street

striping, curb and gutter and valley gutter repair, drainage-way maintenance, dirt street grading, sign maintenance, and support to other departments as necessary. Due to the mobile nature of their jobs, the Streets Department will be key in identifying and reporting potential illicit discharges during their normal course of work.

For the purpose of analytical monitoring and visual stormwater discharge assessments, the Permit splits the year into two wet seasons:

Summer wet season is June 1st through October 31st

Winter wet season is November 1st through May 31st

Responsible Departments: Public Works Department

Table 3 identifies the BMPs, schedule, measurable goals and responsible party(s) for IDDE minimum control measure. A summary of these BMPs is provided below.

Table 3 – Illicit Discharge Detection and Elimination BMPs

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Implement IDDE Program	Public Works Department Create and perpetuate a system to identify, investigate and resolve illicit discharges in Prescott.	City will respond to illicit discharge reports. City will record number of responses each year and the outcome of each ID.
Written IDDE Procedures	Written IDDE procedures are in Prescott City Code Chapter 16-5 as well as the City's Stormwater Management Plan. See Attachment J for detailed IDDE Inspection/Investigation SOP.	
Wet Weather Visual Discharge Assessments	Due to the impaired or not-attaining status shared by the majority of receiving bodies, visual stormwater discharge assessments are performed concurrently with analytical monitoring.	Conduct analytical monitoring for each impaired water body at least twice for each impaired water.
Analytical Monitoring	Analytical monitoring will be conducted on discharges to each impaired water for the pollutants causing these impairments when there is sufficient rain or snowmelt runoff. Due to available staff and safety concerns wet weather monitoring will only be conducted during normal business hours. Prioritize based on suspected pollutants and green infrastructure installation or to support installation of additional green infrastructure.	Two samples collected and assessed per impaired water per wet season (total of four per water per year).

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Dry Weather Screening	City will perform dry weather screening for 20% of known outfalls to each receiving body each fiscal year, selected randomly.	At least 20% of outfalls screened each year. Track number of dry weather screenings resulting in newly opened Illicit Discharge cases.
Outfall Inventory and Mapping	Review outfall inventory to identify data gaps, linear conveyances and those outfalls that are either private outfalls or outlets that do not discharge to WOTUS. Outfall inventory and mapping will be paired with dry weather screenings to maximize efficiency.	Assess at least 20% of outfall inventory each year. Map new outfalls as they are constructed or identified.
Expand Public Awareness and Participation	Using newspaper, radio, and social media outlets advertise pollution reporting form and encourage residents to bring pollution concerns to City's attention.	
Staff Training	Train relevant City staff in Illicit Discharge Detection, prioritizing Recreation, Street Maintenance, Solid Waste, Fleet Services, Public Works Inspectors, Permit Counter and Airport staff.	City will record number of staff trained and which departments/divisions were included.
Unpermitted Dischargers The City will compare AZPDES lists and known operations at least once per year	<p>Public Works Department</p> <p>Identify operations needing AZPDES permits. Construction sites eligible for CGP coverage are required to submit proof of coverage prior to permit issuance.</p> <p>Proposed projects that may be eligible for MSGP coverage are notified of permit requirements during the Pre-Application Conference and/or plan review processes.</p> <p>The City will include a list of all facilities contacted throughout the year in the annual report.</p>	City will record number of operations verified and report unpermitted businesses and construction sites found, if any.

7.4 MCM-4: CONSTRUCTION ACTIVITY STORMWATER RUNOFF CONTROL

MCM4 requires the City to regulate discharges from construction activity, one of the biggest sources of stormwater pollutants. The City's construction stormwater program places emphasis on minimization of sediment discharge, which is the most common pollutant generated by construction activity and can be a vector for other pollutants including nutrients, bacteria, and a range of chemicals.

Currently, the City of Prescott requires construction sites to comply with the state AZPDES Construction General Permit PCC 16-4(less than 1Ac.) and International Building and Plumbing Codes as adopted by City Code. Stormwater controls are included in the City's Building Safety and Public Works inspections. In the event of noncompliance the City may opt to withhold inspections, issue stop work orders, withhold permit closeout and Certificates of Occupancy, take mitigation action at the expense of the contractor, or apply other enforcement mechanisms.

7.4.1 Plan Review, Inspection and Enforcement Procedures

The City reviews development plans to ensure stormwater compliance. Any construction activities in the City of Prescott that meet the criteria to require AZPDES Construction General Permit (CGP) coverage from ADEQ are required to submit an NOI Certification, and Stormwater Pollution Prevention Plan (SWPPP) that has been prepared by a qualified person certifying its accuracy and completeness. A qualified person includes personnel (either the operator's employees or outside personnel) who are knowledgeable in the principles and practice of erosion and sediment controls and pollution prevention, who possess the skills to assess the effectiveness of any control measures selected to control the quality of stormwater discharges from the construction activity.

The Engineering Services Department will review the submitted documents and plans to assure compliance with all City Standards. If not approved, comments will be provided by staff, and those comments must be complied with on subsequent submittals. Although it may require multiple submittals to be approved, once the SWPPP is approved the contractor collects the approved SWPPP and pays the additional plan review fees if required.

Prior to collecting the City-approved SWPPP, the contractor must submit a NOI, and receive an ATD from ADEQ. This ensures that the contractor/operator has received permit coverage for work in the state of Arizona.

The City inspects construction sites for stormwater compliance a minimum of one time during the active phase of construction. Upon inspection, the Inspector will complete an inspection form and retain an electronic or hard copy for a minimum of 3 years. All inspections are tracked using the permitting database. The inspector can upload inspection details as well as photos documenting potential deficiencies and site progress. Prior to final approval the project will be assigned to a City Inspector who will evaluate the effectiveness of the site's temporary sediment and erosion control measures, final stabilization, and overall compliance with the City's ordinances. Inspections will be ongoing throughout all phases of construction and will be conducted on all new construction projects.S

If non-compliance is identified during the inspection, the Inspector will notify the permittee and follow up within 7 days to ensure corrective actions have been made. If corrective actions have not been implemented the inspector will begin the enforcement process described in Attachment C.

In the case that a complaint is received for a potential stormwater non-compliance at or emanating from a construction site, the inspector will investigate the complaint within 7 days of receipt.

Responsible Departments: Public Works Department and Community Development

Table 4 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Construction Activity Stormwater Runoff Control minimum control measure. A summary of the BMPs is provided below.

Table 4 – Construction Site Runoff Control BMPs

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Construction Inventory Ongoing	Public Works Department Maintain an active inventory of active construction sites in the City’s permitting database.	Mandatory all permitted projects tracked in database.
Plan Review, Inspection and Enforcement Procedures	Public Works Department Review plans, perform inspections, and conduct enforcement.	1 inspection per construction site minimum. All sites compliant with applicable City and ADEQ CGP requirements.
Operator Education Ongoing as development occurs	Public Works Department Educate contractors on the City’s Construction Site Stormwater Control requirements during the Erosion and Sediment Control inspections and Lunch N Learn sessions.	Number of operators who received stormwater training each year.
Staff Training Annually	Public Works Department Train City Public Works and Building Safety inspectors annually on ESC inspections enforcement procedures.	Train all staff responsible for ESC inspections annually.
Inspection & Enforcement Ongoing	Public Works & Building Safety Inspectors The City will inspect all sites that require erosion control BMPs. All inspections and resulting enforcement actions are logged in the City’s permitting database.	Perform at least one ESC inspection per project plus additional inspection when violations are identified. Enforce applicable code through authorized means.
Training	Public Works Train Public Works & Building Safety inspectors on inspection of ESC BMPs, identification of stormwater runoff issues at construction sites, enforcement of stormwater construction regulations, and documentation of inspections and enforcement. Send inspectors to Erosion Control Coordinator (ECC) Training.	Conduct 2 or more trainings each year (1 per inspection team). Increase number of ECC certified inspectors each year. All PW inspectors certified by FY2022.

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Construction Operator Training	Public Works The City will research the feasibility of hosting a training for the ADOT Erosion Control Coordinator certification. Number of participants (municipal and private sector employees) will be tracked.	
Site Plan Review	Public Works Review all plans for projects that have construction ESC and post-construction stormwater BMP requirements for compliance with AZPDES and City stormwater regulations. All plan reviews are tracked in City's permitting database.	100% of projects with stormwater requirements have plans reviewed and compliant with AZPDES and City stormwater design (ESC and post-construction) requirements.
Control Wastes		
Green Infrastructure	Public Works Recommend that Green Infrastructure components are added to Capital Improvement Program projects and private development during pre-application and plan review processes.	Increase number of constructed and in-design projects featuring LID or GI features.
Improve Documentation	Public Works, Community Development, Information Technology Improve recordkeeping ability of permitting software to allow better documentation of MCM4 metrics required by the MS4 Permit.	Total disturbed area Inspection frequencies Other metrics?

7.5 MCM-5: POST-CONSTRUCTION STORMWATER MANAGEMENT

MCM 5 requires the City to implement and enforce a program to reduce pollutants from runoff associated with new development and redevelopment projects. To achieve this Prescott City Code Title XVI and General Engineering Standards specify requirements for development projects to include permanent stormwater controls that address the pollutants of concern specific to each project.

The Public Works Department reviews development plans to ensure stormwater controls selected for each project are appropriate for the expected pollutants of concern and are compliant with City regulations. Public Works also maintains an inventory of approved, in construction, and installed stormwater controls and inspects these controls on an annual basis. The City of Prescott General Engineering Standards also requires an Operation & Maintenance Agreement for all Post-Construction BMPs. This Agreement is notarized and recorded with Yavapai County so that it is perpetually bound to the property. The City retains a copy to inform future inspections.

See Attachment C for the enforcement procedure process.

Table 5 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Post-Construction Stormwater Management minimum control measure. A summary of these BMPs is provided below.

Table 5 – Post Construction Runoff Control BMPs

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Stormwater Control Inventory Ongoing	Public Works and IT Departments Maintain up-to-date database of all sites with post-construction stormwater controls including relevant attachments: operations and maintenance agreements, as-built site plans, inspection records, etc. Continue to enhance database functionality to streamline post-construction program.	City will record number of new entries to inventory each year. Maintain 100% of facilities in inventory.
Enforcement Procedures 1 per year minimum	Public Works Department Enforcement procedures for private infrastructure.	City will review enforcement procedures annually. (Number of violations will be recorded each year.)
Plan Review Ongoing as development plans are submitted	Public Works Department Review proposed site plans for stormwater pollution controls prior to permit approval. Permitted sites will be logged and added to the post-construction stormwater amangement inventory.	100% of projects requiring post-construction controls reviewed and compliant with City stormwater design requirements.
Staff Training At least once per permit cycle	Public Works Department Staff trained on performing inspections on post construction stormwater components.	Document staff training
Inspections Ongoing	Public Works Department Perform inspections on all post-construction BMP sites annually. Expand BMP self-inspection program, encouraging property managers to submit proof of regular maintenance.	100% of post-construction BMP sites inspected. Increased number of self-inspections completed.
Final Walkthroughs Ongoing	Public Works Department Participate in final walkthroughs to ensure functional installation of BMPs. Take enforcement actions when violations are identified during inspections or through other means (incidental, complaints, etc.).	Increase in number of walkthrough inspections attended by Stormwater staff.

7.6 MCM-6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING

MCM 6 requires the City to minimize pollutant runoff from municipal facilities and activities through training, facility inspections, implementation of stormwater controls, and implementation of maintenance activities that reduce pollutants discharged from the MS4.

Prescott’s Public Works Department manages the City’s water, wastewater, street maintenance, and solid waste operations. Public Works also operates a Capital Improvement Program, a major component of which involves the replacement and upgrade of aging infrastructure and equipment, both known pollutant sources. The Recreation Services Department maintains hundreds of acres of parks, natural open space, and golf course, as well as right of way landscaping in select areas. Recreation Services Facilities and Fleet Maintenance divisions provide maintenance services for buildings, vehicles, and equipment across City departments.

The City operates several facilities that are covered by ADEQ’s Multi-Sector General Permit (MSGP), which regulates stormwater discharges associated with industrial activity, and Aquifer Protection Permits (APP), which regulates groundwater discharges from a certain activities. These permitted facilities are subject to stormwater management requirements that are largely more stringent than those of the MS4 permit and each requires its own Stormwater Pollution Prevention Plan (SWPPP), which is implemented outside the scope of this SWMP. These facilities include:

City of Prescott Permitted Industrial Facilities

Facility Name	Authorization #	Responsible Department	Permit
Prescott Regional Airport	AZMS81670	Airport Department	MSGP
Airport Wastewater Treatment Plant	?	Public Works Utilities Division	MSGP
Sundog Wastewater Treatment Plant	AZMS80966	Public Works Utilities Division	MSGP
Sundog Transfer Station	AZMS81073	Public Works Solid Waste and Street Maintenance Divisions	MSGP
Wastewater Collection System	ATF33675	Public Works Utilities Division	APP

Table 6 identifies the BMPs, schedule, measurable goals and responsible party(s) for the Pollution Prevention and Good Housekeeping minimum control measure. A summary of these BMPs is provided below.

Table 6 – Pollution Prevention/Good Housekeeping BMPs

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Municipal Facility Inventory, Prioritization and Inspection Depends on facility prioritization	Public Works Department Maintain list of inventoried facilities. Perform inspections based upon prioritized facilities. Facilities prioritized based on pollutant generation potential and proximity to receiving bodies. Higher priority facilities are inspected more often.	All facilities at least once per permit cycle. All medium priority facilities inspected annually. All high priority facilities inspected quarterly.

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Operations, Inspection and Maintenance Ongoing	Field & Facilities Services Maintain City vehicles and equipment	City vehicles inspected once per year minimum.
Implement Controls Annually	Public Works Department Continue to implement SWPPPs/P2 Plans at all City facilities. Continue P2 practices during catch basin maintenance	Review in-place P2 controls each year. Document review. Record number of public basins that are maintained each year.
Staff Training	Public Works Department Train public works inspection staff to conduct municipal facility inspections during precipitation events. Construction sites typically halt activities during rain/snow events and stormwater staff are usually conducting analytical monitoring. This should increase the number of facilities inspected for FY20.	
Maintenance Schedule Quarterly	Public Works Department Stormwater Staff will monitor the ongoing functionality of Green Infrastructure throughout the City and identify maintenance needs such as sediment removal, seeding, and weed control. Most green infrastructure is inspected on a weekly basis.	
Street Sweeping Ongoing	Street Maintenance Division Continue street sweeping program to systematically remove pollutants from roadways. Follow recommendations of the Granite Creek Watershed Pollution Reduction Plan with regards to sweeping equipment capacity and route priorities.	
Municipal Facility Inspections	Public Works Department Inspect municipal facilities as prioritized and scheduled in the SWMP. Increase number of facilities identified and inspected across all municipally owned and managed buildings, lands, and facilities.	100% of facilities inspected according to the schedule established in the municipal facility inventory (quarterly, annually, 20% per year).
Green Infrastructure O&M Ongoing	Public Works & Recreation Services Departments Maintain green infrastructure and stormwater filtration BMPs at City operated facilities in both Park and Street settings.	

BMP Category (Frequency)	BMP Responsibility and Description	Measurable Goals
Household Hazardous Waste Collection Annual Annual	Solid Waste Division Provide City solid waste customers with collection of residential hazardous waste items. This an annual service provided by a contractor under the direction of the Public Works Solid Waste Division.	
Planning	Public Works Department Develop and implement a Watson Lake and Upper Granite Creek Watershed Management Plans to address pollutants of concern associated with the two TMDLs. The City has a consultant, Wood PLC, that is tasked with conducting research and modeling and drafting these two management plans. Once complete, these management plans will inform the development of new BMPs to achieve pollutant reductions within the MS4.	
Updated Water Policy	Public Works and Legal Departments At the end of FY19 the City expanded its Conservation Water Rebate program to include funding for passive rainwater harvesting projects, demonstrated to reduce runoff volume and pollutant loading. The City is also working to amend its water policy to encourage or require decommissioning of septic systems and connecting properties to sewer.	
Watson Woods wetland preservation	Public Works and Recreation Services Department The City, Prescott Creeks, and the Army Corps of Engineers have entered into a dialogue to establish a perpetual easement for the preservation of Watson Woods Riparian Preserve, a CWA 404 in-lieu fee mitigation site. As part of this effort a development plan for the Preserve is being collaboratively constructed and it is anticipated wetlands will be expanded and constructed using in-lieu fees. These wetlands would serve as nutrient sinks for Granite Creek waters before they reach Watson Lake.	

8.0 TRAINING

The City has a training program to address the training requirements for municipal employees outlined in Permit sections 6.4.3.10 (IDDE) and 6.4.6 (Pollution Prevention/Good Housekeeping for Municipal Operators). In addition to this permit-required training, the City also trains construction and post-construction inspectors and plan reviewers (Permit sections 6.4.4 and 6.4.5, respectively).

Employees targeted for training include: Public Works and Building Safety Inspectors, field maintenance crews, and those employees who are involved in targeted operations and their supervisors. Training is also provided for Stormwater Personnel responsible for the stormwater compliance component of plan review, post-construction and municipal facility inspections, and various other MS4 program tasks. Training may also be provided to certain City contractors at the discretion of the Environmental Coordinator. The training program is based on the identified needs of the municipal employees. See table below for an outline of the training provided by the City.

Course	Audience	Frequency	Content
IDDE	<ul style="list-style-type: none"> - Building Inspectors - Public Works Inspectors - Solid Waste Staff - Utilities Staff - Street Maintenance Staff - Code Enforcement Officers - Fleet Services Staff - Facilities Maintenance Staff 	Annual	<ul style="list-style-type: none"> - General Stormwater Awareness - Illicit Discharge Detection
Municipal Facilities	<ul style="list-style-type: none"> - City Engineers - Facilities Supervisors - Environmental Coordinators - Fleet Mechanics 	Annual	<ul style="list-style-type: none"> - Facility Inspection - Pollution Prevention Practices
Inspection	<ul style="list-style-type: none"> - Stormwater Personnel - Public Works Inspectors - Building Safety Inspectors - Code Enforcement Officers 	Annual	<ul style="list-style-type: none"> - Basics - Enforcement/Forms - Construction Inspections

8.1 TYPES OF TRAINING

The following sections describe the different types of storm water pollution prevention training conducted by the City.

8.1.1 Illicit Discharge Detection and Elimination (IDDE)

As outlined in Permit section 6.4.3.10, training is required to inform public employees of hazards associated with illegal discharges and improper disposal of waste. The goals of the program are to raise awareness, and prevent Illicit Discharges (IDs) and Illicit Connections (ICs), and to encourage employees to report IDs and ICs they may encounter.

City management will also be trained on the use of the proper forms and process for reporting and follow up of illicit discharges (See Attachment F).

8.1.2 Municipal Facilities

As outlined in Permit section 6.4.6.f, training is required on the Operation & Maintenance (O&M) program for municipal operations. The goal of the program is to prevent or reduce pollutant runoff from municipal operations due to activities including but not limited to: park and open space maintenance, fleet and building maintenance, new construction and land disturbances (see Permit sections 4.1.3 and 4.1.4), and stormwater system maintenance. Training topics include:

- Maintenance activities, schedules, and inspection procedures for controls to reduce floatables and other pollutants.
- Controls to reduce or eliminate the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt and sand storage locations and snow disposal areas.
- Procedures to properly dispose of waste removed from the City and municipal operations (including dredge spoil, accumulated sediments, floatables, and other debris).

The City trains maintenance staff on proper pollution prevention controls annually, and City Engineers and Facility Supervisors are trained on the facility inspection processes at least once per permit cycle.

8.1.3 Construction Inspection

Training is required for employees responsible for conducting construction site inspections and applying enforcement actions against construction site operators (Permit section 6.4.4.3). The goal of the program is to prevent or reduce pollutant runoff from construction sites. Public Works and Building Safety Inspectors are trained at least once per year on performing erosion and sediment control inspections.

8.1.4 Post-Construction Inspection

Training is required for employees responsible for conducting post-construction site inspections and applying enforcement actions (Permit section 6.4.4.3). The goal of the program is to prevent or reduce pollutant runoff from new development and redevelopment projects. Public Works stormwater staff are trained at least once per permit cycle on performing inspections on post construction stormwater components.

8.2 TRAINING FREQUENCY

The City conducts annual training for new employees and existing employees on the topics identified in SWMP section 8.1. Training is also provided when employees are assigned new operations, tasks, equipment, or protocols.

8.3 TRAINING METHOD

Training may be provided by one or more of the following methods:

- Incorporate stormwater training into existing training programs (i.e. safety, materials handling, new employee orientation, etc.).
- Establish on-the-job awareness and reinforcement (stormwater pollution prevention posters, articles on the City's internal website, etc.).
- Provide more customary training such as in-house workshops or presentations.

8.4 TRAINING MEASURABLE GOALS

The measurable goal for all training BMPs is to track and report the number of employees trained during each reporting period. All formal trainings will be documented with sign-in sheets and topics discussed.

9.0 ANALYTICAL MONITORING

The City discharges directly to 13 waterbodies listed as Impaired or Not Attaining on the 2018 ADEQ 303(d) list. ADEQ has written and EPA has approved final TMDLs for Watson Lake Reservoir (Nitrogen, low DO, high pH) and for the Upper Granite Creek Watershed (*E. coli*) that includes the tributaries listed below. ADEQ drafted a Miller Creek addendum to the Watershed TMDL in 2016 that has not received final approval at this time.

The City has developed a Sampling and Analyses Plan to meet the requirements provided in section 5.1.g and 7.0 of the AZPDES permit. The Sampling and Analyses Plan is a document that outlines the process and procedure for monitoring the pollutants in Prescott's impaired waters. The current Sampling and Analyses Plan for Prescott is found in Attachment K.

10.0 REPORTING REQUIREMENTS

This section describes the reporting requirements as outlined in the Permit.

10.1 ANNUAL REPORT

The City will submit an annual report each year, on or before September 30, for each reporting period (July through June of each 2017-2021) to ADEQ using ADEQ's myDEQ online permitting system. During the process of completing the annual report, City personnel will also review the plan and arrange for updates as needed in accordance with the requirements in the Permit. The report will include:

- Status of compliance with permit conditions.
- Updates regarding mapping requirements (including percent complete).
- Assessment of the effectiveness of the BMPs.
- Assessment of the progress towards achieving the measurable goals for each of the six minimum control measures (including description of the targeted message for each audience, distribution method and dates, and program evaluation method).
- Description of the activities used to promote public participation.
- Summary of illicit discharges identified, including:
 - Location of discharge and its source(s)
 - Description of the discharge
 - Estimated illicit discharge duration
 - Method of discovery
 - Date of discovery
 - Date of elimination
 - Mitigation or enforcement action
 - Responsible person (if known)
 - Estimated volume
- All outfall screening and monitoring data collected (Discharge Monitoring Report, details below).
- The status of any plans or activities required by the Permit for managing impaired and not-attaining waters.
- Status of the construction runoff management including number of project plans reviewed, number of inspections, and number of enforcement actions.
- Status of stormwater management for new development and redevelopment.
- Status of ordinance development and review.
- Status of the operation and maintenance programs (6.4.6.1).
- Description of any changes in identified BMPs or measurable goals.
- Description of activities to be conducted during next reporting cycle.

10.2 DISCHARGE MONITORING REPORT

The City will produce a Discharge Monitoring Report (DMR) to be completed digitally through myDEQ and submitted on or before the Annual Report deadline. Inspection forms from all wet weather visual assessments performed as outlined in Permit section 7.3 MCM-3: IDDE will be included in the DMR. The DMRs will be submitted along with the annual report no later than September 30 of each year.

10.3 OTHER REPORTING

Per Permit section 9.12 the City is required to:

- Notify ADEQ of any noncompliance to the Permit which may endanger human health or the environment;
- Give notice to ADEQ as soon as possible of any planned physical alterations or additions to permitted facilities if the alterations may constitute a new source or could significantly change the nature or increase the quantity of pollutants discharged;
- Give advance notice to ADEQ of any planned changes that may result in noncompliance with permit requirements, and
- Contact ADEQ if the City becomes aware that relevant information in the NOI or any other submitted report was not included.

11.0 PROGRAM ASSESSMENT

The City will annually self-evaluate the SWMP for compliance with the Small General MS4 Permit. All BMPs will be assessed for appropriateness and effectiveness by analyzing their established goals. If necessary, ineffective or infeasible BMPs may be modified or replaced, however documentation of why the BMP was insufficient, expectation of the replacement BMP, and why the replacement BMP will meet the defined goals is required within the SWMP. Adding components or controls to BMPs can be done at any time. Self-evaluation documentation will be maintained digitally along with the SWMP and submitted to ADEQ as part of the annual report.

12.0 RECORD KEEPING

The City will keep all records pertaining to the Permit for a minimum period of 3 years after permit coverage is terminated or expires. The records will include all reports, follow up documentation, inspection records, enforcement actions, and data used in the development of the NOI.

13.0 PLAN AVAILABILITY

The Stormwater Management Plan is maintained online and accessible to the public. The SWMP can be viewed at <http://www.prescott-az.gov/water-sewer/water-resource-management/arizona-pollution-discharge-elimination-system/>. A hardcopy of the City's SWMP is kept at the Public Works Engineering office for public viewing during normal business hours.

ATTACHMENT A
ACRONYMS AND DEFINITIONS

ACRONYMS

The following is a list of acronyms and abbreviations that are used in this document.

AAC	Arizona Administration Code
ADEQ	Arizona Department of Environmental Quality
ARS	Arizona Revised Statute
ATD	Authorization to Discharge
AZPDES	Arizona Pollutant Discharge Elimination System
BMPs	Best Management Practices
CGP	Construction General Permit
COP	City of Prescott
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
ERP	Enforcement Response Plan
GIS	Geographic Information System
IC	Illicit Connection
ID	Illicit Discharge
IT	Information Technology
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measures
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MSGP	Multi-Sector General Permit
MWS	Master Watershed Stewardship

NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
P2	Pollution Prevention
SIC	Standard Industrial Classification
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load

DEFINITIONS

Arizona Pollutant Discharge Elimination System (AZPDES) - The ADEQ implementation of the EPA program for issuing, modifying, revoking, reissuing, terminating, monitoring, and enforcing permits and imposing and enforcing pretreatment requirements under the Clean Water Act.

Best Management Practices (BMPs) - Measures or practices used to prevent or minimize the amount of pollution entering surface waters. BMPs may take the form of a process, activity, or physical structure.

Discharge - The conveyance, channeling, runoff, or drainage stormwater, including snowmelt, from a site.

Minor Spills - Spills that have a volume less than the reportable quantity, can be controlled and cleaned up with onsite resources, do not contaminate the environment, and do not cause injury to personnel.

National Pollutant Discharge Elimination System (NPDES) - The EPA program for issuing, modifying, revoking, reissuing, terminating, monitoring, and enforcing permits and imposing and enforcing pretreatment requirements under the Clean Water Act.

Non-stormwater discharge - Any discharge not comprised entirely of stormwater except discharges authorized by a NPDES/AZPDES permit.

Nonstructural BMPs - Practices that will reduce or eliminate the transfer of pollutants to stormwater and do not require installation of permanent structural devices to treat runoff.

Outfall - Any discernible stormwater conveyance (e.g., pipe, ditch, swale, canal) that discharges to waters of the state or to a separate municipal storm system. See also point source discharge.

Point Discharge - Any discernible, confined, and discrete conveyance, including pipes, ditches, channels, tunnels, conduits, and wells.

Pollutant - Any dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discharged equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into stormwater.

Precipitation - Any form of rain or snow.

Run-on - Stormwater surface flow or other surface flow that enters the site other than that where it originated.

Runoff - Part of precipitation, snowmelt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into the receiving waters.

Secondary Containment - Structures surrounding tanks or other storage containers that are designed to catch spilled material from the storage containers. Secondary containment must provide spill containment for the contents of the single largest tank within the containment structure plus sufficient freeboard to allow for the 25-year, 24-hour storm event.

Stormwater - Stormwater runoff, snowmelt runoff, and surface runoff and drainage.

Structural BMPs - Permanent structural devices that will reduce or eliminate pollutants discharge into stormwater runoff.

ATTACHMENT B

NOTICE OF INTENT

ATTACHMENT C
ENFORCEMENT RESPONSE PLAN

ATTACHMENT D
MUNICIPAL FACILITY LIST

ATTACHMENT E

ORGANIZATION CHART AND RESPONSIBILITIES

Department	Title	Responsibility
Administration	City Manager	Signs MS4 NOI
Community Development	City Planners	Review Planning and Zoning Permits
	Building Safety Personnel	Review Building Permits Performs ESC inspections for single family residences (<1Ac. & not a common plan of development)
Police	Code Enforcement Officer	Investigates and enforces city code violations.
Public Works	Environmental Coordinator	Implements Stormwater Management Plan
	Public Works Director	Oversees and supports SWMP implementation
	Construction Inspector	Performs construction site inspections for all commercial development and residential development that is >1Ac. or a common plan of development.
	Street Maintenance Personnel	Cleans drainage inlets and stormwater systems
	City Engineer	Supports and directs SWMP implementation.
	GIS Personnel	Maintain current mapping system of City stormwater system
Recreation Services	Recreation Department	ROW, Median cleaning, Green Infrastructure maintenance.

ATTACHMENT F

FORMS

ATTACHMENT G
TRAINING RECORDS

ATTACHMENT H
SELF EVALUATION RECORDS

ATTACHMENT I

ORDINANCES

ATTACHMENT J

IDDE INSPECTION/INVESTIGATION SOP

ATTACHMENT K
SAMPLING AND ANALYSES PLAN

ATTACHMENT L

MS4 PERMIT