

City of Detroit Lakes SWPPP

January 01, 2020 To December 31, 2020

This program consists of the following 8 Minimum Control Measure(s).

1. MCM 1: Public Education and Outreach
2. MCM 2: Public Participation/ Involvement
3. MCM 3: Illicit Discharge Detection and Elimination (IDDE)
4. MCM 4: Construction Site Stormwater Runoff Control
5. MCM 5: Post-Construction Stormwater Management
6. MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations
7. MCM Discharge to Impaired Waters (NOT IN CURRENT PERMIT)
8. Annual SWPPP Assessment, Annual Reporting, and Record Keeping

1 MCM 1: Public Education and Outreach

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

New permittees shall develop and implement, and **existing permittees** shall revise their current program, as necessary, and continue to implement, a public education program to distribute educational materials or equivalent outreach that informs the public of the impact **stormwater** discharges have on water bodies and that includes actions citizens, businesses, and other local organizations can take to **reduce** the discharge of pollutants to **stormwater**. The program shall also include:

- a. Distribution of educational materials or equivalent outreach focused on:
 - (1) Specifically selected **stormwater**-related issue(s) of high priority to the **permittee** to be emphasized during this permit term (e.g., specific **TMDL** reduction targets, changing local business practices, promoting adoption of residential **BMPs**, lake improvements through lake associations, responsible management of pet waste, household chemicals; yard waste, deicing materials, etc.)
 - (2) **Illicit discharge** recognition and reporting **illicit discharges** to the **permittee**
- b. An implementation plan that consists of the following:
 - (1) Target audience(s), including measurable goals for each audience
 - (2) Responsible **Person(s)** in charge of overall plan implementation
 - (3) Specific activities and schedules to reach measurable goals for each target audience
 - (4) A description of any coordination with and/or use of other **stormwater** education and outreach programs being conducted by other entities, if applicable
 - (5) Annual evaluation to measure the extent to which measurable goals for each target audience are attained
- c. Documentation of the following information:
 - (1) A description of any specific **stormwater**-related issues identified by the **permittee** under Part III.D.1.a(1)
 - (2) All information required under Part III.D.1.b
 - (3) Any modifications made to the program as a result of the annual evaluation under Part III.D.1.b(5)
 - (4) Activities held, including dates, to reach measurable goals
 - (5) Quantities and descriptions of educational materials distributed, including dates distributed

Best Management Practices

1.1 Educational Information Distribution and Outreach Program

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required Yes

Description

Develop and maintain a public education program to distribute educational materials or equivalent outreach to inform the public of the impact stormwater discharges have on water bodies. The program will advise the public of actions citizens, businesses and other local organizations can take to reduce the discharge of pollutants to stormwater.

Include educational materials that focus on specifically selected stormwater issues of high priority to the permittee, such as specific TMDL reduction targets, changing local business practices, promoting adoption of residential BMPs, lake improvements through lake associations, and responsible management of pet waste, household chemicals, yard waste, deicing materials, etc. Include efforts to educate the public to recognize illicit discharges in the MS4 and to report illicit discharges to the permittee.

Address the following elements in the program:

1. Identify target audiences with measurable stormwater education goals specific to each audience.
2. Identify the person or persons in charge of overall plan implementation.
3. Describe specific activities and schedules planned to meet measurable goals for each target audience.
4. Describe coordination with or use of other stormwater education and outreach programs being conducted by other entities as applicable.
5. Complete an annual evaluation to measure the extent to which measurable goals for each target audience are attained.
6. Describe each completed activity by date, including quantities and descriptions of educational materials distributed.

Goals

1.1.1 Identify Target Audiences

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Identify specific target audiences for stormwater education within the MS4, including specific stormwater-related issues and measurable goals for each audience.

Provide the following information to document completion of this activity each reporting period:

1. Describe each identified target audience
2. State specific stormwater related issues for each target audience
3. Identify measurable goals for education and outreach efforts for each target audience

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date **Name**

12/31/2020

2020 Target Audience

Description

The City of Detroit main focus was with the fourth grade Water Festival however due to the COVID pandemic the schools shut down. The City was unable to hold any large meetings due to partial shut down for the year and State requirements due to the COVID pandemic.

1.1.2 Responsible Person - Public Education and Outreach

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Identify the person in charge of overall plan implementation, each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Public Education and Outreach Responsible Person

Description

The City Administrator, Kelcey Klemm, is responsible for implementing and/or coordinating the City of Detroit Lakes Public Education and Outreach Program activities in 2020.

1.2 Conduct Public Education and Outreach Activities

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required Yes

Description

Conduct the activities described in the stormwater Public Education and Outreach program for the identified target audiences.

Goals

1.2.1 Update Educational Materials

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Prepare and maintain educational materials for distribution or publication to address the specific stormwater education goals of the target audiences identified in the plan. Review the materials annually and update as needed to support program goals and permit requirements.

Upload or link to copies of educational materials or information completed each reporting period to document activity in support of this goal.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 List of Education Materials

Description

Attached is a list of materials that have been handed out, published, or displayed. Materials are available in the City Administration office, Facebook, City's webpage, etc.

File Attachment [Small Residential Construction.pdf](#)

File Attachment [Publication Information.xlsx](#)

1.2.2 Stormwater Education Website

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Develop and maintain relevant stormwater education information on the MS4's public website, including information on general stormwater management topics and information specific to stormwater management issues within the MS4.

The website will also maintain postings of stormwater information, display opportunities for public participation and provide links to MPCA and other websites with water resources information.

Provide a short description of information published on the website as described above through each reporting period and a link to the current website URL.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date **Name**
12/31/2020 2020 Wellhead Protection

Description

The City of Detroit Lakes has a webpage with information regarding Wellhead Protection. Information included on the page: City of Detroit Lakes Wellhead Protection Plan, What is Wellhead Protection?. What is Groundwater? Why Protect Groundwater? How can you help?

The Webpage is available at: <https://cityofdetroitlakes.com/wellhead>

File Attachment [2020 Wellhead Protection Website Page.png](#)

File Attachment [2020 Wellhead Protection Website Page Continued.png](#)

12/31/2020 2020 Stormwater Webpage

Description

Public Works employees inspect and maintain the City's 29 miles of storm water system, which consists of 99 ponds and 6 pump stations. The City takes a proactive approach to storm water run off. We strive to improve the City storm drainage system by constructing water holding basins to reduce the nutrient run off into our lakes and streams. The Public Works staff performs routine maintenance on our storm water collection system including lift stations and catch basin cleaning to insure proper drainage of storm water. Homeowners are requested to minimize the discharge of grass clippings into the street because grass clippings and leaves are one of the major causes of obstructing catch basin drainage. It is permissible for residents to remove leaves and grass clippings from storm water catch basins and streets in front of their home or in the neighborhood. Our street sweeper logs more than 6,000 miles, removing nearly 5,000 yards of debris annually as part of the Minnesota Municipal Separate Storm Sewer System (MS4) mandate. To report any issues regarding storm water please contact the City of Detroit Lakes Street Department at dpublicworks@cityofdetroitlakes.com or 218-847-4637. Spring Lawn Clean up Tips Fall Lawn Clean up Tips Storm Water Pollution Prevention Program (MS4) Pelican River Watershed District

Webpage available at: <https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055>

File Attachment [2020 Storm Water Webpage.png](#)

12/31/2020 2020 Sanitary Sewer Maintenance

Description

Public Works Department employees inspect and maintain 87.7 miles of sanitary sewer, including 1,484 manholes and 58 lift stations, with an aggressive annual maintenance program. The City is constantly monitoring the condition of the sanitary sewer mains with cleaning equipment, televising the lines when a problem occurs, and replacing or lining the sanitary sewer mains when it becomes necessary. Before a new street is constructed or the reconstruction of an existing street over a sanitary sewer main begins, the pipe is evaluated to determine the condition and make sure that it is in good repair. Property owners are responsible for the sanitary sewer line that runs from their house to the main line, which typically runs along the center of the street. To report any issues regarding the sanitary sewer system related to the main line please contact the City of Detroit Lakes Public Works at (218) 847-4637 or dpublicworks@cityofdetroitlakes.com from 7:00 a.m.-3:30p.m. or after hours at (218) 847-5658. City of Detroit Lakes Sanitary Sewer Maintenance Policy

Webpage available at: <https://cityofdetroitlakes.com/index.asp?SEC=4E39A8A8-B770-4D99-9270-27647905943A>

File Attachment [2020 Sanitary Sewer Maintenance Webpage.png](#)

1.2.3 Distribute Educational Materials at Public Facilities

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Provide access to stormwater educational materials prepared in accordance with the SWPPP for public access at public facilities within the MS4.

Document activity to support this measurable goal with an uploaded copy or stated description of each distributed item, the locations where the materials are made available and the quantity of printed materials provided at each location through the reporting period.

Activity Date	Name
12/31/2020	2020 Stormwater Pollution Prevention on Small Residential Construction

Description

Information Brochure provided to residents who are constructing small residential construction projects such as garages, homes, decks, fences, etc. Information is available in the City's lobby and handed out with building and zoning permits. Brochures are available throughout the entire year. Brochure is also available on the City's Facebook Page and website.

File Attachment [Small Residential Construction.pdf](#)
File Attachment [10 Steps to Stormwater Pollution Prevention on Small Residential Construction Sites.png](#)
File Attachment [Construction Stormwater Information - Facebook Page.png](#)

1.2.4 Distribute Educational Materials at Community Events

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Distribute educational materials at community events or activities within the MS4. Typical community events include an annual Ground Water Festival and Day of Caring clean up activity.

Identify the community event, date of activity, copy or description and quantity of distributed material each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B

Activity Date	Name
05/05/2020	2020 Ground Water Festival

Description

The City of Detroit Lakes had planned to hold the 2020 Ground Water Festival on May 5, 2020, however, due to COVID-19 the school district closed their doors in March the Water Festival was cancelled.

1.2.5 Newsletter Articles

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Provide seasonally relevant stormwater education information in the local newspaper.

Provide a copy of each article published in the MS4's newsletter, including the date of publication and general distribution.

Planned: 2017

Complete: 2017

Activity Date	Name	Description
None		

1.2.6 Public Service Announcements

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Provide seasonally relevant public service announcements for local broadcast media use focused on high priority stormwater education topics identified in the SWPPP.

Provide a copy of the PSA text, approximate number of times aired and general time frame for broadcast each reporting period to document activity in support of this goal.

Planned: 2017

Complete: 2017

Activity Date	Name	Description
None		

1.2.7 Stormwater Education Exhibits

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Host stormwater education exhibits at community events for opportunity to provide stormwater program information and to receive public feedback. Post articles on the City's website.

Document activity toward achieving this goal each reporting period with a description and date of the event, narrative summary of the information provided, estimate of the number of public contacts made and identification or copy, including the quantity, of materials distributed.

Activity Date	Name	Description
None		

1.2.8 Stormwater Education Public Presentations

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Conduct presentations on stormwater education topics identified within the SWPPP for local organizations, including community groups, business groups, schools, non-profit organizations.

Identify each presentation conducted each reporting period as described above, including the date, name of the group or organization, topic presented, approximate number of participants in the discussion and any materials distributed. Include a copy of the presentation document when available.

Planned: 2018 A 2018 B

Complete: 2018 A 2018 B

Activity Date	Name	Description
None		

1.2.9 Collaborative Support

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Collaborate with other entities stormwater education and outreach goals, including local MPCA, Becker County and the Pelican River Watershed District.

Report collaboration efforts each reporting period, including the name and description of each group, and collaborative efforts completed including a summary of educational materials or information provided, date conducted and estimated number of participants for each activity. Maintain a link to MPCA, PRWD & Becker County Web pages for water resource information.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 HHW

Description

Residents can drop off their household hazardous waste materials at the Becker County site located 3 miles north of Detroit Lakes on Highway 59. Items that are acceptable include: paints, stains, varnishes, solvents, garden pesticides, flammable products, poisons, adhesives, aerosol cans, lawn care products, cleaners, automotive chemicals.

There are two flyers available regarding the serves in the front office at the City Administration Building.

Becker County sends out a recycling flyer with all property tax statements.

File Attachment [BC Enviro Tax insert 2019.pdf](#)

File Attachment [Becker County Recycle Flyer.pdf](#)

1.2.10 Distribute Educational Materials to Target Audiences

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

The City of Detroit Lakes will distribute stormwater related informational materials to target audiences, such as contractors and school groups, each reporting period.

Identify the target audience, date of activity, copy or description and quantity of distributed material each reporting period.

Planned: 2015 2016 2017 2018 A 2018 B

Complete: 2015 2016 2017

Activity Date	Name	Description
None		

1.2.11 Informational Signage

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Install signage in public spaces with information related to storm water quality and...
example - pick up dog waste, storm water pond purpose, etc.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B

Activity Date	Name	Description
None		

2 MCM 2: Public Participation/ Involvement

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

a. **New permittees** shall develop and implement, and **existing permittees** shall revise their current program, as necessary, and continue to implement, a Public Participation/Involvement program to solicit public input on the **SWPPP**. The **permittee** shall:

1. Provide a minimum of one (1) opportunity annually for the public to provide input on the adequacy of the **SWPPP**. Public meetings can be conducted to satisfy this requirement provided appropriate local public notice requirements are followed and opportunity to review and comment on the **SWPPP** is provided.

2. Provide access to the **SWPPP** document, Annual Reports, and other documentation that supports or describes the **SWPPP** (e.g., Regulatory Mechanism(s), etc.) for public review, upon request. All public data requests are subject to the Minnesota Government Data Practices Act, Minn. Stat. 13.

3. Consider public input, oral and written, submitted by the public to the **permittee**, regarding the **SWPPP**.

b. Document the following information:

1. All relevant written input submitted by **persons** regarding the **SWPPP**.

2. All responses from the **permittee** to written input received regarding the **SWPPP**, including any modifications made to the **SWPPP** as a result of the written input received.

3. Date(s) and location(s) of events held for purposes of compliance with this requirement.

4. Notices provided to the public of any events scheduled to meet this requirement, including any electronic correspondence (e.g., website, e-mail distribution lists, notices, etc.)

Best Management Practices

2.1 Public Meeting - SWPPP Input

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Conduct an annual public meeting for the public to provide input on the adequacy of the SWPPP. Follow local public notice requirements and provide an opportunity to review and comment on the SWPPP. Review all input received through the meeting for consideration of modification of the SWPPP.

Goals

2.1.1 Annual Public Meeting Notice

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Provide notice to the public of any events scheduled to provide an opportunity for public to provide input on the adequacy of the SWPPP. Conform to local public notice requirements for all meetings and include all types of notice distribution (mail, email, web site posting, print or broadcast media and public postings).

The meeting will include an overview of progress to date on the City's SWPPP for the past year and required activities for the following year. The meeting will also provide an opportunity for input of public opinion regarding the adequacy of the SWPPP.

Provide a copy or records of each type of notice published or distributed for each public meeting held as described each reporting period, including a description of the type and size of distribution audience.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
03/12/2020	2020 MS4 Annual Public Meeting

Description

The meeting notice was published in the local newspaper (Detroit Lakes Tribune and Becker County Record) on February 26, 2020, and March 4, 2020. The 2020 Annual Meeting was held on March 12, 2020, to discuss the Municipal Separate Storm Sewer System which includes review of the 2019 annual report and conducting the 2019 annual report.

Attached is the annual meeting minutes.

File Attachment [2019 Annual Report Review - Affidavit of Publication.pdf](#)

File Attachment [2019-03-12 Minutes.docx](#)

2.1.2 Conduct Public Meeting

Responsible Staff / Position:

Larry Remmen
Community Development Director
(218) 846-7125

Description

Conduct (at least) one public meeting annually as an opportunity for the public to provide input on the adequacy of the SWPPP.

Document all public meetings each reporting period, including the date and venue of the meeting, a copy of the agenda an description of any distributed materials and posted exhibits, the number of participants. Also include a copy or summary of verbal input and copies of written feedback submitted by the public.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date

Name

03/12/2020

2020 Annual Public Meeting

Description

The City of Detroit Lakes held there annual MS4 public meeting on March 12, 2020, to get public input on water quality issues and the City's Stormwater Pollution Plan.

Attached are the minutes from the meeting.

File Attachment [2019-03-12 Minutes.docx](#)

2.2 Public Access to SWPPP Documents

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required Yes

Description

Provide access to the SWPPP document, Annual Reports, and other documentation that supports or describes the SWPPP for public review, upon request. All public data requests are subject to the Minnesota Government Data Practices Act, Minn. Statute Section 13.

Goals

2.2.1 Website Access to SWPPP Documents

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Provide public access to the SWPPP and related documents through the MS4 website including the SWPPP document, Annual Reports and related documents (regulatory mechanism, annual budgets, etc.)

Provide a current list of hyperlinks to the SWPPP and related documents described above each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
09/14/2020	MS4 Annual Report for 2019

Description

Published the MS4 Annual Report for 2019 on the City of Detroit Lakes website located at: <https://detroitlakesmn.govoffice3.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uplo...>

File Attachment [2019 Annual Report - Screen Shot.png](#)

File Attachment [MS4 Webpage.png](#)

09/14/2020	2019 SWPPP Document
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Description

The 2019 SWPPP document entered into PermiTrack was entered onto the City's website on September 14, 2020.

The 2019 SWPPP document can be found at:

<https://detroitlakesmn.govoffice3.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uplo...>

File Attachment [2019 SWPPP Report - Screenshot.png](#)

2.2.2 SWPPP Printed Document Access

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Provide public access to printed copies of the SWPPP, Annual Report and other related documentation at public facilities (MS4 government facilities, community centers, public library).

Identify locations where printed copies of the SWPPP, Annual Report and related documents are publicly accessible each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Printed Document Access

Description

The SWPPP documents are available throughout the year for public access by filling out the Data Privacy request form.

File Attachment [Data Request Form.pdf](#)

12/31/2020	2019 Printed SWPPP
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Description

A copy of the 2019 printed SWPPP document is available at the City of Detroit Lakes office to view during regular business hours. Request must be made by filling out the Data Privacy Request form.

A copy of the 2019 SWPPP document was made available at the public annual input meeting held on March 12, 2020.

<https://detroitlakesmn.govoffice3.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uplo...>

2.3 Public Input Review and Consideration

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required Yes

Description

Consider public input, oral and written, submitted by the public to the permittee, regarding the SWPPP. Evaluate the input and consider any modifications to the SWPPP as a result of the written input received.

Goals

2.3.1 Consider Public Input

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Collect and review all public input for consideration of potential modification of the SWPPP, including written input and records of verbal feedback submitted by the public regarding the SWPPP. Identify any modification of the SWPPP resulting from the public input.

Provide a summary of all public input regarding the SWPPP collected each reporting period, including description of any resulting SWPPP modifications.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Consider Public Input

Description

The City of Detroit Lakes has a section on the website where residents can leave comments or questions and a staff member will contact them by phone or email.

Webpage: <https://cityofdetroitlakes.com/index.asp?SEC={2CFFBF48-64EB-42A7-852D-67F6CB59B71B}&Type=QUICKFORM>

2.4 Public Participation/ Involvement Program Management

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required No

Description

Identify the person responsible for implementing and/ or coordinating the Public Participation/ Involvement program for the City of Detroit Lakes.

Goals

2.4.1 Responsible Person - Public Participation/ Involvement

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Identify the person or position responsible for the Public Participation/ Involvement program, each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Responsible Person - Public Participation/Involvement

Description

The City Administrator, Kelcey Klemm, is responsible for implementing and/or coordinating the City of Detroit Lakes participation/involvement program activities in 2020.

3 MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

New permittees shall develop, implement, and enforce, and **existing permittees** shall revise their current program as necessary, and continue to implement and enforce, a program to detect and eliminate **illicit discharges** into the **small MS4**. The IDDE program shall consist of the following:

- a. Map of the **small MS4** as required by Part III.C.1.
 - b. Regulatory Mechanism(s) that effectively prohibits **non-stormwater discharges** into the **small MS4**, except those **non-stormwater discharges** authorized under Part I.B.1.
 - c. Incorporation of **illicit discharge** detection into all inspection and maintenance activities' conducted under Part III.D.6.e and f. Where feasible, **illicit discharge** inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).
 - d. Detecting and tracking the source of **illicit discharges** using visual inspections. The **permittee** may also include the use of mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures that may be effective investigative tools.
 - e. Training of all field staff, in accordance with the requirements of Part III.D.6.g(2), in **illicit discharge** recognition (including conditions which could cause **illicit discharges**), and reporting **illicit discharges** for further investigation.
 - f. Identification of priority areas likely to have **illicit discharges**, including at a minimum, evaluating land uses associated with business/industrial activities, areas where **illicit discharges** have been identified in the past, and areas with storage of large quantities of **significant materials** that could result in an **illicit discharge**. Based on this evaluation, the **permittee** shall conduct additional **illicit discharge** inspections in those areas identified as having a higher likelihood for **illicit discharges**.
 - g. For timely response to known, suspected, and reported **illicit discharges**:
 1. Procedures for investigating, locating, and eliminating the source of **illicit discharges**.
 2. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the **small MS4**. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer at 1-800-422-0798 (toll free) or 651-649-5451 (Metro area), if the source of the **illicit discharge** is a spill or leak as defined in Minn. Stat. 115.061.
 3. When the source of the **illicit discharge** is found, ERPs required by Part III.B (if necessary) to eliminate the **illicit discharge** and require any needed corrective action(s).
 - h. Documentation of the following information:
 1. Date(s) and location(s) of IDDE inspections conducted in accordance with Part III.D.3.c and f
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2. Reports of alleged **illicit discharges** received, including date(s) of the report(s), and any follow-up action(s) taken by the **permittee**
3. Date(s) of discovery of all **illicit discharges**
4. Identification of **outfalls**, or other areas, where **illicit discharges** have been discovered
5. Sources (including a description and the responsible party) of **illicit discharges** (if known)
6. Action(s) taken by the **permittee**, including date(s), to address discovered **illicit discharges**

Best Management Practices

3.1 Storm Sewer System Map

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

Develop and maintain a storm sewer system map of the **small MS4** (as required by Part III.C.1) that depicts the following:

- a. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes
- b. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate
- c. Structural stormwater BMPs that are part of the permittee's small MS4
- d. All receiving waters

Goals

3.1.1 Develop Storm Sewer System Map and Inventory

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop a storm sewer system map and inventory as required by Permit Part III.C. and including the listed items.

Document completion of this goal by providing a copy of, or link to the completed storm sewer system map.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Activity Date	Name
12/01/2020	2020 Storm Sewer System map

Description

A copy of the Storm sewer system map is attached. Steve Hanson updates the map on an as needed basis.

File Attachment [Updates2020StormWaterMap.pdf](#)

3.1.2 Annual Review and Update - Storm Sewer System Map

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Review and update the storm sewer system map annually to show changes in the storm sewer system, outfalls, structural stormwater BMPs and receiving waters.

Provide a narrative summary of storm sewer system map updates and a copy of or link to the updated storm sewer system map each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B

Activity Date **Name**

12/01/2020 Review Storm Sewer Maps

Description

Develop and maintain a storm sewer system map of small MS4.

File Attachment [Updates2020StormWaterMap.pdf](#)

3.2 Regulatory Mechanism - IDDE

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Required Yes

Description

Develop, maintain and enforce a regulatory mechanism that effectively prohibits non-stormwater discharges into the small MS4, except those non-stormwater discharges authorized under part I.B.1.

Goals

3.2.1 IDDE Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Develop and adopt a regulatory mechanism to effectively prohibit non-stormwater discharges into the small MS4 as required.

Provide a copy of or link to the adopted IDDE regulatory mechanism.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
10/08/2020	2020 IDDE Regulatory Mechanism

Description

The City of Detroit Lakes has adopted to the City Code, Section 1008, Stormwater Illicit Discharge and Connection. This section of the City Code is for minimum requirements for Stormwater management that will diminish threats to public health, safety, public and private property, and natural resources of the community by establishing standards that protect the City's lakes, ponds, wetlands, and streams from pollutants carried in urban runoff. This was created in August 14, 2014.

File Attachment [Stormwater Illicit Discharge and Connection - Section 1008.pdf](#)

3.2.2 Annual Review - IDDE Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Review the IDDE regulatory mechanism and related policies and procedures each reporting period. Identify any need for revisions to improve the regulatory mechanism effectiveness.

Summarize the results of the review as described each reporting period, including specific revisions required.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Description

Summarize enforcement actions initiated or completed under the IDDE regulatory mechanism each reporting period, including at a minimum, the following:

1. Name of the person responsible for violating the terms and conditions of the permittee's Regulatory Mechanism(s)
2. Date(s) and location(s) of the observed violation(s)
3. Description of the violation(s), including reference(s) to relevant Regulatory Mechanism(s)
4. Corrective action(s) (including completion schedule) issued by the permittee
5. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
6. Referrals to other regulatory organizations (if any)
7. Date(s) violation(s) resolved

File Attachment [4-1-2020 1153 West Lake Dr.pdf](#)

File Attachment [6-11-20 1322 Long Ave.pdf](#)

File Attachment [7-9-2020 404 E State St.pdf](#)

File Attachment [7-9-2020 DLHS Madison Ave.pdf](#)

File Attachment [7-9-2020 Matson Constr. 2022 Edgewood Drive.pdf](#)

File Attachment [7-9-2020 MMCDC.pdf](#)

File Attachment [9-17-2020 Dans Service Ctr 110 Main St W.pdf](#)

File Attachment [10-17-2020 940 S Shore Dr Centry Builders.pdf](#)

3.3 Dry Weather Illicit Discharge Inspections

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

Incorporate illicit discharge detection into all inspection and maintenance activities conducted under Part III.D.6.e and f. (Where feasible) Conduct illicit discharge inspections during dry-weather conditions.

Goals

3.3.1 Inspections for Illicit Discharges

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Include identification of potential illicit discharges in all routine inspections of structural stormwater BMPs, ponds, outfalls, stockpiles, storage and material handling areas conducted during periods of dry weather.

List any potential and confirmed illicit discharges identified as part of routine inspections described above each reporting period. Identify steps taken to eliminate the illicit discharge and the result of the completed actions.

Planned: 2013 2014 2015 2016 2017

Complete: 2013 2014 2015 2016 2017

Activity Date	Name	Description
<hr/>		
None		
<hr/>		

3.4 Visual Inspection for Illicit Discharge

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

Conduct visual inspections to detect and track the source of illicit discharges. Visual inspection techniques/ tools may also include use of mobile cameras, discharge sample collection and analysis and other detailed inspection procedures.

Goals

3.4.1 Visual Inspection Program

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop and implement a plan for visual inspections to detect and track the source of illicit discharges using available inspection tools and techniques.

Provide a summary of the visual inspection plan and program each reporting period. Include the number and type of inspections conducted, list of illicit discharges identified and resolution of confirmed illicit discharges.

Activity Date	Name	Description
None		

3.4.2 Respond to Illicit Discharge or Dumping Reports

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Respond to complaints or report of suspected illicit discharges and illegal dumping in accordance with the illicit discharge response procedures.

Summarize the number and type of complaints or reports of suspected illicit discharges received by the MS4 and resolution of any verified illicit discharge or illegal dumping activities each reporting period.

Planned: 2018 A 2018 B 2019 2020

Complete: 2018 A 2018 B 2019

Activity Date	Name
01/01/2020	2020 IDDE Dumping

Description

Respond to complaints or report of suspected illicit discharges and illegal dumping in accordance with the illicit discharge response procedures.

File Attachment [102 Lake Ave - Grant letter 6-30-2020.docx](#)

File Attachment [113 Union St W - Jason Mowers 7-9-2020.docx](#)
File Attachment [238 Stone Creek Dr & 1877 Hickory Ln 7-9-2020.docx](#)
File Attachment [303 Summit Ave - Harrison 6-29-20.doc](#)
File Attachment [404 Rossman Ave - Steve Mowers 8-28-20 \(Priscilla sent\).docx](#)
File Attachment [406 Central St - Kershner 8-18-2020.doc](#)
File Attachment [609 Terry, 513 Bowling & 311 Bowling 7-16-2020.docx](#)
File Attachment [1159 Summit Ave - Lancaster 8-18-20.doc](#)
File Attachment [1397 Burroughs Rd - Seaberg-Graham 7-1-2020.docx](#)
File Attachment [1770 & 1730 Brainard Blvd - Fercho 7-20-20.docx](#)
File Attachment [Fercho - 7-20-2020.pdf](#)
File Attachment [Michigan - Huron letters 8-11-2020.docx](#)

3.5 Field Staff Training - Illicit Discharge Recognition and Reporting

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

Provide training for all field staff in illicit discharge recognition and reporting for further investigation. See Part III.D.6.g(2).

Goals

3.5.1 Municipal Employee Training - Illicit Discharge Identification

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Provide illicit discharge identification and elimination in on-going training for municipal employees including instruction on source identification techniques, proper notification procedures and discharge response procedures.

Provide a summary of IDDE training provided each reporting period, including a summary of training program content, training dates and locations, list of participants and training program source.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B

Activity Date	Name
01/01/2020	2020 Field Staff Training

Description

Employees were trained in the following items: PT Staff/FT Staff

1. MS4 Training (MN Municipal Separate Storm Sewer System)
 - a. Best Management Practices
 - b. Illicit Discharge Detection and Elimination
2. Safety Review
3. Other Items
4. Equipment Rodeo – at snow dump

01/01/2020	2020 Field Staff Training
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Description

Employees were trained in the following items: PT Staff/FT Staff

1. MS4 Training (MN Municipal Separate Storm Sewer System)
 - a. Best Management Practices
 - b. Illicit Discharge Detection and Elimination
2. Safety Review
3. Other Items
4. Equipment Rodeo – at snow dump

File Attachment [2020 PT Mowers MS4 Training.pdf](#)

3.6 Identify and Inspect Priority Areas for Potential Illicit Discharge

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

Identify priority areas likely to have illicit discharges through evaluation of past and present land uses associated with business/ industrial activity, areas where illicit discharges have been identified in the past and areas with past or present storage of large quantities of significant or hazardous materials.

Conduct additional illicit discharge inspections in those areas identified as described above.

Goals

3.6.1 Illicit Discharge Inspection Priority Areas

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop and maintain a list of priority areas likely to have illicit discharges based on the characteristics described and local municipal employee knowledge. Review and update the list annually.

Provide a copy of or link to the updated priority area list each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete:

Activity Date	Name	Description
None		

3.6.2 Inspect Priority Areas for Illicit Discharge

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Inspect priority areas identified as likely to have priority discharges.

Provide a summary of priority area inspections completed and inspection results each reporting period. Include a list of any illicit discharges identified in the priority areas with the status of resolution of the discharge.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014

Activity Date	Name	Description
None		

3.7 Illicit Discharge Response Procedures

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

Develop, implement and maintain procedures for timely response to known, suspected and reported illicit discharges, including:

1. Procedures for investigating, locating and eliminating the source of illicit discharges.
2. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. (The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer at 1-800-422-0798 (toll free) or 651-649-5451 (Metro area), if the source of the **illicit discharge** is a spill or leak as defined in Minn. Stat. Section 115.061.)
3. When the source of the **illicit discharge** is found, ERPs required by Part III.B (if necessary) to eliminate the **illicit discharge** and require any needed corrective action(s).

Goals

3.7.1 Develop Illicit Discharge Response Procedures

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop procedures for timely response to known, suspected and reported illicit discharges as described.

Provide a copy of or link to the required procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Illicit Discharge Response Procedures

Description

The City of Detroit Lakes is required to development and implement adequate enforcement authority for illicit discharges and connections that take place within the boundaries of the Municipal Separate Storm Sewer System. Attached is the procedures developed for illicit discharge and connections stormwater violations.

File Attachment [*Illicit Discharge ERP.pdf*](#)

3.7.2 Maintain Illicit Discharge Response Procedures

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Review response procedures annually and update as necessary to maintain an effective and responsive program.

Summarize any planned or completed revisions to the Illicit Discharge Response Procedures each reporting period and provide a copy of or link to the current procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2019

Activity Date	Name
10/08/2020	2020 Review Response Procedures

Description

On October 9, 2020, City staff reviewed the Illicit Discharge Response Procedures and decided no changes needed to be made at this time. Staff will review once reauthorization has been completed.

File Attachment [2020-10-08 MS4 Packet.pdf](#)

3.7.3 Implement Illicit Discharge ERP

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Implement Illicit Discharge emergency response procedures to investigate, locate and eliminate the source of illicit discharges; to respond to spills and implement corrective actions.

Summarize emergency responses conducted to confirmed illicit discharge sources and reported spills each reporting period, including a list of each occurrence and description or resulting resolution.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

3.8 Non-Stormwater Discharges Review

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Required No

Description

Review sources of non-stormwater discharges to evaluate the pollution potential to the MS4.

Goals

3.8.1 Annual Non-Stormwater Discharges Review

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Review sources of non-stormwater discharge to evaluate the pollution potential to the MS4. (These non-stormwater sources could include discharges of process water, air conditioner condensate, non-contact cooling water, vehicle wash water, or sanitary wastes, and are typically the result of unauthorized connections of sanitary or process wastewater.)

Confirm completion of the annual review and provide a summary of any specific non-stormwater discharges with pollution potential identified and steps planned or implemented to eliminate them.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013

Activity Date	Name	Description
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None

3.9 IDDE Program Management

Responsible Staff / Position: Bradley Green
Public Works Director
(218) 847-4637

Required No

Description

Develop and maintain procedures for record keeping within the IDDE program as specified within Permit Part III.D.3.h. Identify the name or position of the individual(s) who is responsible for implementing and/or coordinating the IDDE program.

Goals

3.9.1 Develop IDDE Record-Keeping Procedures

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop documentation and record keeping procedures for the City's IDDE program as specified in Permit Part III.D.3.h by 8/1/2014. Review the procedures annually and revise as necessary to maintain compliance with the permit and reporting requirements.

Provide reference to or a copy of the completed procedures and any subsequent adopted updates each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017

Activity Date	Name	Description
None		

3.9.2 Responsible Person - IDDE Program

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Identify the person or position responsible for implementation and/ or coordination of the MS4s IDDE program each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2019

Activity Date	Name
12/31/2020	2020 IDDE Program

Description

The City of Detroit Lakes Public Works Director, Shawn King, is responsible for administering and coordinating the IDDE program.

3.10 ** Household Hazardous Waste Program

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Required No

Description

Continue to participate in the Becker County Hazardous Waste and Recycling Program, which collects and properly disposes of adhesives, aerosol spray products, automotive products, fluorescent lamps, furniture refinishing products, household cleaners, paint, stain, pool chemicals, pesticides, herbicides and insecticides.

Collection and proper disposal of these materials reduces potential for illicit discharge or dumping of hazardous materials into the MS4.

Goals

3.10.1 Participate in Becker County HHW Program

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Maintain annual participation in the Becker County Household Hazardous Waste and Recycling Program.

Summarize the household hazardous waste program services provided, including the type of service, frequency and location of collection or drop-off services and total volume/ weight of materials collected for disposal from residents of the MS4.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 HHW

Description

The City of Detroit Lakes encourages residents to drop off their household hazardous water materials at the County site located 3 miles north of Detroit Lakes on Highway 59. Items that are accepted include paints, stains, varnishes, solvents, garden pesticides, flammable products, poisons, adhesives, aerosol cans, lawn care products, cleaners, automotive chemicals.

Household Hazardous Waste and Recycle Flyers are available in the front office, City's website, and Facebook page.

File Attachment [Becker County Recycle Flyer.pdf](#)

File Attachment [Recycle Information - City Webpage - 2020-09-16.png](#)

File Attachment [Recycle Information Page 2 - City Webpage - 2020-09-16.png](#)

File Attachment [BC Enviro Tax insert 2019.pdf](#)

File Attachment [Household Hazardous Waste - Facebook - Entered September 16, 2020.png](#)

File Attachment [City of Detroit Lakes - MS4 Page.png](#)

4 MCM 4: Construction Site Stormwater Runoff Control

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

New permittees shall develop, implement, and enforce, and **existing permittees** shall revise their current program, as necessary, and continue to implement and enforce, a Construction Site **Stormwater** Runoff Control program that **reduces** pollutants in stormwater runoff to the **small MS4** from **construction activity** with a land disturbance of 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 occurs within the **permittee's** jurisdiction. The program shall incorporate the following components:

a. Regulatory Mechanism(s)

A Regulatory Mechanism(s) that establishes requirements for erosion and sediment controls and waste controls that is at least as stringent as the **Agency's general permit to Discharge Storm water Associated with Construction Activity NO. MN R100001** (as of the **effective date** of this permit). The **permittee's** Regulatory Mechanism(s) shall require that owners and operators of **construction activity** develop site plans that must be submitted to the **permittee** for review and approval, prior to the start of **construction activity**. Site plans must be kept up-to-date by the owners and operators of **construction activity** with regard to **stormwater** runoff controls. The Regulatory Mechanism(s) must require that site plans incorporate the following erosion and sediment controls and waste controls as described in the above referenced permit:

- (1) **BMPs** to minimize erosion
- (2) **BMPs** to minimize the discharge of sediment and other pollutants
- (3) **BMPs** for dewatering activities
- (4) Site inspections and records of rainfall events
- (5) **BMP** maintenance
- (6) Management of solid and hazardous wastes on each project site
- (7) Final stabilization upon the completion of **construction activity**, including the use of perennial vegetative cover on all exposed soils or other equivalent means
- (8) Criteria for the use of temporary sediment basins

b. Site plan review

The program shall include written procedures for site plan reviews conducted by the **permittee** prior to the start of **construction activity**, to ensure compliance with requirements of the Regulatory Mechanism(s). The site plan review procedure shall include notification to owners and operators proposing **construction activity** of the need to apply for and obtain coverage under the **Agency's general permit to Discharge Stormwater Associated with Construction Activity NO. MN R100001**.

c. Public input

The program shall include written procedures for receipt and consideration of reports of noncompliance or other **stormwater** related information on **construction activity** submitted by the public to the **permittee**.

d. Site inspections

The program shall include written procedures for conducting site inspections, to determine compliance with the **permittee's** Regulatory Mechanism(s). The written procedures shall:

(1) Include procedures for identifying priority sites for inspection. Prioritization can be based on such parameters as topography, soil characteristics, type of **receiving water(s)**, stage of construction, compliance history, weather conditions, or other local characteristics and issues.

(2) Identify frequency at which site inspections will be conducted

(3) Identify name(s) of individual(s) or position titles responsible for conducting site inspections

(4) Include a checklist or other written means to document site inspections when determining compliance.

e. Enforcement Response Procedures (ERPs) required by Part III.B of this permit

f. Documentation of the following information:

(1) For each site plan review - The project name, location, total acreage to be disturbed, owner and operator of the proposed **construction activity**, and any **stormwater** related comments and supporting documentation used by the **permittee** to determine project approval or denial.

(2) For each site inspection - Inspection checklists or other written means used to document site inspections

Best Management Practices

4.1 Regulatory Mechanism - Erosion, Sediment and Waste Controls

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Develop, implement and enforce a regulatory mechanism that establishes requirements for erosion and sediment control and waste control from construction activity as described.

Goals

4.1.1 ESC Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Develop, adopt and implement a regulatory mechanism to establish requirements for erosion and sediment controls and waste controls from construction activity as described.

Provide a copy of or link to the adopted regulatory mechanism.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Enforcement for Construction Activities PLa

Description

The City of Detroit Lakes is required to development and implement adequate enforcement authority for construction activities that take place within the boundaries of the Municipal Separate Storm Sewer System. Attached is the Enforcement Response Plan developed by the City of Detroit Lakes.

File Attachment [Enforcement for Construction Activities.pdf](#)

4.1.2 Annual Review - ESC Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Review the construction site ESC and waste control regulatory mechanism and related policies and procedures each reporting period. Identify any need for revisions to improve the regulatory mechanism effectiveness.

Summarize the results of the review as described each reporting period, including specific revisions required.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B

Activity Date **Name**
10/08/2020 2020 ESC Regulatory Mechanism

Description

On October 8, 2020, the City staff reviewed the Enforcement for Construction Activities Plans and decided no changes needed to be made at this time. City staff will review again after the reauthorization permit has been complete.

File Attachment [2020-10-08 MS4 Packet.pdf](#)

4.1.3 Revisions - ESC Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Develop, adopt and implement revisions to the construction activity ESC and waste control regulatory mechanism and associated policies or procedures as necessary to improve effectiveness and permit compliance.

Summarize any revisions to the regulatory mechanism developed, adopted or implemented each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete:

Activity Date **Name**
10/08/2020 2020 Construction Activity ESC

Description

On October 8, 2020, City staff reviewed the ESC Regulatory Mechanism and decided no changes needed to be made at this time.

File Attachment [2020-10-08 MS4 Packet.pdf](#)

4.1.4 Enforcement - ESC Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Enforce provisions of the adopted construction activity ESC and waste control regulatory mechanism and associated policies and procedures.

Summarize enforcement actions initiated or completed under the regulatory mechanism each reporting period, including the results of each formal action.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017

Activity Date	Name	Description
None		

4.2 Site Plan Review - ESC

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Required Yes

Description

Develop, maintain and implement written site plan review for construction site erosion and sediment control practices prior to the start of construction activity to ensure compliance with requirements of the Regulatory Mechanism(s). Include notification to owners and operators proposing construction activity of the need to apply for and obtain coverage under the Agency's general permit.

Goals

4.2.1 Develop Construction Site Stormwater Runoff Control Review Procedures

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Develop procedures for review of construction site erosion and sediment control and waste control practices as described, including notification procedures as required. Adopt and implement the new procedures within 12 months of the date coverage is extended.

Provide a copy of or link to the required procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2015 2016 2017

Activity Date	Name	Description
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None

4.2.2 Maintain Construction Site ESC Review Procedures

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Review construction site ESC review procedures annually and update as necessary to maintain an effective program in compliance with all permit requirements.

Summarize any planned or completed revisions to the ESC site design review procedures each reporting period and provide a copy of or link to the current procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

4.2.3 Implement ESC Site Plan Review Program

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Implement the construction site review procedures for construction activity erosion and sediment control and waste control.

Summarize construction activity site design reviews initiated or completed each reporting period. For each site plan review include the project name, location, total acreage to be disturbed, owner and operator of the proposed construction activity, and any stormwater related comments and supporting documentation used by the permittee to determine project approval or denial.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
<hr/>		
None		
<hr/>		

4.3 Public Input - Construction Activities

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required Yes

Description

Development and implementation of procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee.

Goals

4.3.1 Develop Public Input Procedures

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Develop procedures for receipt and consideration of reports of noncompliance or other construction activity related information by the public.

Provide a copy of or link to the completed procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Construction Activity Non-Compliance

Description

The City of Detroit Lakes has developed procedures that will be used when a complaint related to stormwater issues related to construction projects is received. There is a list of steps that are followed when the complaint is received, follow up on complaint, site inspection, and notice from City. See attached form and procedures.

File Attachment [Construction Activity Non-Compliance Form and Procedure.pdf](#)

4.3.2 Maintain Public Input Procedures

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Review public input procedures each reporting period and implement revisions as necessary to maintain effectiveness and permit compliance.

Summarize any planned or completed revisions to the public input procedures program completed in the reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

4.3.3 Receive and Consider Public Input

Responsible Staff / Position: Kelcey Klemm
 City Administrator
 (218) 847-5658

Description

Implement procedures for receipt and consideration of public input relative to noncompliance with stormwater management during construction activity and respond as appropriate to such input.

Summarize the public input regarding noncompliance with stormwater management related to construction activity each reporting period. Include the results of any public input resulting in resolution of noncompliant activity.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

4.4 Site Inspections - Construction

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Required Yes

Description

Develop and implement procedures for conducting inspections of construction sites to determine compliance with permittee's regulatory mechanisms.

Goals

4.4.1 Develop Construction Site Inspection Procedures

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Develop written procedures for conducting site inspections to determine compliance with regulatory mechanism requirements and policies. The procedures must:

1. Include procedures for identifying priority sites for inspection based on such parameters as topography, soil characteristics, type of receiving water(s), stage of construction, compliance history, weather conditions, or other local characteristics and issues.
 2. Identify frequency at which site inspections will be conducted
 3. Identify name(s) of individual(s) or position titles responsible for conducting site inspections
 4. Include a checklist or other written means to document site inspections when determining compliance.
- Provide a copy of or link to the completed written procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Site Inspection Process and Form

Description

The Code Compliance Official is responsible for conducting each inspection of the individual construction sites within the City of Detroit Lakes jurisdiction in accordance with the Erosion and Sediment Control ordinance. See attached site inspection process and form.

File Attachment [*Site inspection process and form D Ramstad.pdf*](#)

4.4.2 Maintain Construction Site Inspection Procedures

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Review construction site inspection procedures annually and update as necessary to maintain an effective program in compliance with permit requirements.

Summarize any planned or completed revisions to the written construction site inspection procedures each

reporting period and provide a copy of or link to the current procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete:

Activity Date	Name	Description
None		

4.4.3 2017 Conduct Construction Site ESC Inspections

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Conduct construction site erosion and sediment control and waste control inspections in accordance with the written program procedures and documentation.

Report on the number of inspections completed each reporting period, including inspection checklists or other written means used to document site inspections.

Planned: 2017

Complete: 2017

Activity Date	Name	Description
None		

4.4.4 2018 - Conduct Construction Site Inspections

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Conduct construction site erosion and sediment control and waste control inspections in accordance with the written program procedures and documentation.

Report on the number of inspections completed each reporting period, including inspection checklists or other written means used to document site inspections.

Planned: 2018 A 2018 B

Complete:

Activity Date	Name	Description
None		

4.5 Enforcement Response Procedures - Construction Activity

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Develop and implement Enforcement Response Procedures (ERP) in accordance with the SWPP and document enforcement actions pursuant to the ERP, including at a minimum, the following:

- a. Name of the person responsible for violating the terms and conditions of the permittee's Regulatory Mechanism(s)
- b. Date(s) and location(s) of the observed violation(s)
- c. Description of the violation(s), including reference(s) to relevant Regulatory Mechanism(s)
- d. Corrective action(s) (including completion schedule) issued by the permittee
- e. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
- f. Referrals to other regulatory organizations (if any)
- g. Date(s) violation(s) resolved

Goals

4.5.1 Develop ERP for Construction Activity

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Develop and adopt Enforcement Response Procedures (ERP) for construction activity to enforce provisions of the regulatory mechanism, policies and procedures. The ERP must be adopted and implemented within 12 months of the date coverage is extended.

Provide a copy of or link to the adopted ERP for construction activity.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019

Complete: 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 ERPs Construction and Non-Compliance Complaint Issues

Description

Attached is the procedures for receipt and consideration of reports of non-compliance for construction activity. Attached is a document relative to develop and implement adequate enforcement authority for construction activity that takes place within the boundaries of Municipal Separate Storm Sewer System. The document is the Enforcement Response Plan for the City of Detroit Lakes.

File Attachment [Construction Activity Non-Compliance Form and Procedure.pdf](#)

File Attachment [Enforcement for Construction Activities.pdf](#)

4.5.2 Maintain Construction Activity ERP

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Review the construction activity ERP annually and update as necessary to maintain effectiveness and permit compliance.

Summarize any resulting revision to the ERP initiated or completed each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

4.5.3 Construction Activity ERP Documentation

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Document response actions pursuant to enforcement of the construction activity regulatory mechanism on-going or completed each reporting period.

Include all information required in the permit, including at a minimum:

1. Name of the person responsible for violating the terms and conditions of the permittee's Regulatory Mechanism(s)
2. Date(s) and location(s) of the observed violation(s)
3. Description of the violation(s), including reference(s) to relevant Regulatory Mechanism(s)
4. Corrective action(s) (including completion schedule) issued by the permittee
5. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
6. Referrals to other regulatory organizations (if any)
7. Date(s) violation(s) resolved

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2015 2016 2017

Activity Date	Name	Description
None		

4.6 Construction Site Runoff Control Program Management

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Identify the name(s) or position(s) responsible for implementing and/ or coordinating the construction site runoff control program.

Goals

4.6.1 Responsible Person - Construction Site Runoff Control

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Identify the individual(s) responsible for implementing and/ or coordinating the construction site runoff controls in accordance with the permit requirements and City of Detroit Lakes procedures.

Provide the individual(s) name(s) each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Construction Site Runoff Control Responsible Person

Description

Code Compliance Officer, Priscilla Gurath, was responsible for implementing and/or coordinating the construction site runoff controls in accordance with the permit requirements and the City of Detroit Lakes procedures.

5 MCM 5: Post-Construction Stormwater Management

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

New permittees shall develop, implement, and enforce, and **existing permittees** shall revise their current program, as necessary, and continue to implement and enforce, a Post-Construction **Stormwater** Management program that prevents or **reduces water pollution** after **construction activity** is completed, related to **new development** and **redevelopment** projects with land disturbance of 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**, within the permittee's jurisdiction and that discharge to the **permittee's small MS4**. The program shall consist, at a minimum, of the following:

a. A Regulatory Mechanism(s) that incorporates:

(1) A requirement that owners and/or operators of **construction activity** submit site plans with post-construction **stormwater** management **BMPs** to the **permittee** for review and approval, prior to start of **construction activity**

(2) Conditions for Post-Construction **Stormwater** Management:

The **permittee** shall develop and implement a Post-Construction **Stormwater** Management program that requires the use of any combination of **BMPs**, with highest preference given to **Green Infrastructure** techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a **construction activity** to the **MEP**:

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

1) **Stormwater** discharge Volume, unless precluded by the **stormwater** management limitations in Part 111.D.5.a(3)(a)

2) **Stormwater** discharges of Total Suspended Solids (TSS)

3) **Stormwater** discharges of Total Phosphorus (TP)

(b) For **redevelopment** projects - a net reduction from pre-project conditions (on an annual average basis) of:

1) **Stormwater** discharge Volume, unless precluded by the **stormwater** management limitations in Part 111.D.5.a(3)(a)

2) **Stormwater** discharges of TSS

3) **Stormwater** discharges of TP

(3) **Stormwater** management limitations and exceptions

(a) Limitations

1) The **permittee's** Regulatory Mechanism(s) shall prohibit the use of infiltration techniques to achieve the conditions for post-construction **stormwater** management in Part III.D.5.a(2) when the infiltration **structural stormwater BMP** will receive discharges from, or be constructed in areas:

a) Where industrial facilities are not authorized to infiltrate industrial **stormwater** under an **NPDES/SDS Industrial Stormwater** Permit issued by the **Agency**

b) Where vehicle fueling and maintenance occur

c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally **saturated soils** or the top of bedrock

d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating **stormwater**

2) The **permittee's** Regulatory Mechanism(s) shall restrict the use of infiltration techniques to achieve the conditions for post-construction **stormwater** management, without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas:

a) With predominately Hydrologic Soil Group D (clay) soils

b) Within 1,000 feet up-gradient, or 100 feet down-gradient of **active karst** features

c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13

d) Where soil infiltration rates are more than 8.3 inches per hour

3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction **stormwater** management in Part.III.D.5.a(2), the **permittee's** Regulatory Mechanism(s) may allow exceptions as described in Part III.D.5.a(3)(b). The **permittee's** Regulatory Mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process.

(b) Exceptions for stormwater discharge volume

The **permittee's** Regulatory Mechanism(s) may allow for lesser volume control on the site of the original **construction activity** than that in Part III.D.5.a(2) only under the following circumstances:

1) The owner and/or operator of a **construction activity** is precluded from infiltrating **stormwater** through a designed system due to any of the infiltration related limitations described above, and

2) The owner and/or operator of the **construction activity** implements, to the **MEP**, volume reduction techniques, other than infiltration, (e.g., evapotranspiration, reuse/harvesting, conservation design, green roofs, etc.) on the site of the original **construction activity** that **reduces stormwater** discharge volume, but may not meet the conditions for post-construction **stormwater** management in Part III.D.5.a(2).

(4) Mitigation provisions

There may be circumstances where the **permittee** or other owners and operators of a **construction activity** cannot cost effectively meet the conditions for post-construction **stormwater** management for TSS and/or TP in Part III.D.5.a(2) on the site of the original **construction activity**. For this purpose, the **permittee** shall identify, or may require owners or operators of a **construction activity** to identify, locations where mitigation projects can be completed. The **permittee's** Regulatory Mechanism(s) shall ensure that any **stormwater** discharges of TSS and/or TP not addressed on the site of the original **construction activity** are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

(a) Mitigation project areas are selected in the following order of preference:

1) Locations that yield benefits to the same **receiving water** that receives runoff from the original **construction activity**

2) Locations within the same Department of Natural Resource (**DNR**) **catchment area** as the original **construction activity**

3) Locations in the next adjacent **DNR catchment area** up-stream

4) Locations anywhere within the **permittee's** jurisdiction

(b) Mitigation projects must involve the creation of new **structural stormwater BMPs** or the retrofit of existing **structural stormwater BMPs**, or the use of a \ properly designed regional **structural stormwater BMP**.

(c) Routine maintenance of **structural stormwater BMPs** already required by this permit cannot be used to meet mitigation requirements of this Part.

(d) Mitigation projects shall be completed within 24 months after the start of the original **construction activity**.

(e) The **permittee** shall determine, and document, who is responsible for long-term maintenance on all mitigation projects of this Part.

(f) If the **permittee** receives payment from the owner and/or operator of a **construction activity** for mitigation purposes in lieu of the owner or operator of that **construction activity** meeting the conditions for post-construction **stormwater** management in Part III.D.5.a(2), the **permittee** shall apply any such payment received to a public **stormwater** project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e).

(5) Long-term maintenance of structural stormwater BMPs

The **permittee's** Regulatory Mechanism(s) shall provide for the establishment of legal mechanism(s) between the **permittee** and owners or operators responsible for the long-term maintenance of **structural stormwater BMPs** not owned or operated by the **permittee**, that have been implemented to meet the conditions for post-construction **stormwater** management in Part III.D.5.a(2). This only includes **structural stormwater BMPs** constructed after the **effective date** of this permit, that are directly connected to the **permittee's MS4**, and that are in the **permittee's** jurisdiction. The legal mechanism shall include provisions that, at a minimum:

(a) Allow the **permittee** to conduct inspections of **structural stormwater BMPs** not owned or operated by the **permittee**, perform necessary maintenance, and assess costs for those

structural stormwater BMPs when the **permittee** determines that the owner and/or operator of that **structural stormwater BMP** has not conducted maintenance.

(b) Include conditions that are designed to preserve the **permittee's** right to ensure maintenance responsibility, for **structural stormwater BMPs** not owned or operated by the **permittee**, when those responsibilities are legally transferred to another party.

(c) Include conditions that are designed to protect/preserve **structural stormwater BMPs** and site features that are implemented to comply with Part III.D.5.a(2). If site configurations or **structural stormwater BMPs** change, causing decreased **structural stormwater BMP** effectiveness, new or improved **structural stormwater BMPs** must be implemented to ensure the conditions for post-construction **stormwater** management in Part III.D.5.a(2) continue to be met.

b. Site plan review

The program shall include written procedures for site plan reviews conducted by the **permittee** prior to the start of **construction activity**, to ensure compliance with requirements of the Regulatory Mechanism(s).

c. Documentation of the following information:

(1) Any supporting documentation used by the **permittee** to determine compliance with Part III.D.5.a, including the project name, location, owner and operator of the **construction activity**, any checklists used for conducting site plan reviews, and any calculations used to determine compliance

(2) All supporting documentation associated with mitigation projects authorized by the **permittee**

(3) Payments received and used in accordance with Part III.D.5.a(4)(f)

(4) All legal mechanisms drafted in accordance with Part III.D.5.a(5), including date(s) of the agreement(s) and name(s) of all responsible parties involved

Best Management Practices

5.1 Regulatory Mechanism - Post-Construction Stormwater Management

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required Yes

Description

Develop, maintain and enforce a regulatory mechanism that incorporates the following items as detailed in the permit:

1. Requirement that owners and/ or operators of construction activity submit site plans with post-construction stormwater management BMPs for review and approval prior to the start of construction activity.
2. Conditions for Post-Construction Stormwater Management that requires the use of any combination of BMPs necessary to meet specified requirements for new development projects and redevelopment projects.
3. Limitations and exceptions for stormwater management.
4. Mitigation provisions.
5. Provisions for long-term maintenance of structural stormwater BMPs.

Goals

5.1.1 Post-Construction Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Develop, adopt and implement a regulatory mechanism to establish requirements for post-construction stormwater management as described.

Provide a copy of or link to the adopted regulatory mechanism.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Complete: 2013 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Stormwater Management Ordinance

Description

The City of Detroit Lakes adopted an ordinance on February 13, 2018, for Erosion and Sediment Control which amended section 1007 of the Detroit Lake City Code.

Attached is the ordinance which includes General Provisions, Plan Procedures, SWPPP Design and Standards, Inspection and Maintenance, and Administration and Enforcement.

File Attachment [Ordinance 418.pdf](#)

5.1.2 Annual Review - Post Construction Regulatory Mechanism

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Review the post-construction stormwater management regulatory mechanism and related policies and procedures each reporting period. Identify any need for revisions to improve the regulatory mechanism effectiveness.

Summarize the results of the review as described each reporting period, including specific revisions required.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2019

Activity Date	Name
10/08/2020	2020 Annual Review

Description

On October 8, 2020, City staff reviewed Section 1007 of the City of Detroit Lakes City Code. Staff determined at this time, no changes needed to be made. Will review again upon completion of the reauthorization process.
File Attachment [2020-10-08 MS4 Packet.pdf](#)

5.1.3 Revisions - Post-Construction Stormwater Management Regulatory Mechanism

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

Develop, adopt and implement revisions to the post-construction stormwater management regulatory mechanism and associated policies or procedures as necessary to improve effectiveness and permit compliance.

Summarize any revisions to the regulatory mechanism developed, adopted or implemented each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

5.1.4 Enforcement - Post-Construction Stormwater Management Requirements

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Enforce provisions of the adopted post-construction stormwater management regulatory mechanism and associated policies and procedures.

Summarize enforcement actions initiated or completed under the regulatory mechanism each reporting period, including at a minimum, the following:

1. Name of the person responsible for violating the terms and conditions of the permittee's Regulatory Mechanism(s)
2. Date(s) and location(s) of the observed violation(s)
3. Description of the violation(s), including reference(s) to relevant Regulatory Mechanism(s)
4. Corrective action(s) (including completion schedule) issued by the permittee
5. Date(s) and type(s) of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
6. Referrals to other regulatory organizations (if any)
7. Date(s) violation(s) resolved

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Enforcement Response Procedures Post Construction

Description

The City of Detroit Lakes has developed and implement enforcement authority for Post Construction activity that takes place within the boundaries of the Municipal Separate Storm Sewer System. Attached is a copy of the Enforcement Response Procedures for Post Construction.

File Attachment [Enforcement Response Procedures Post Construction.pdf](#)

5.2 Site Plan Review - Post-Construction Stormwater Management

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Develop, maintain and implement written procedures for site plan reviews by the permittee prior to the start of construction activity to ensure compliance with requirements of the Post-Construction Stormwater Management Regulatory Mechanism.

Goals

5.2.1 Develop Post-Construction Stormwater Management Review Procedures

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Develop procedures for review of post-construction stormwater management plans as described, including notification procedures as required. Procedures compliant with MS4 permit requirements will be adopted and implemented within 12 months of the date coverage is extended.

Provide a copy of or link to the required procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019

Complete: 2014 2015 2016 2017 2018 A 2019

Activity Date	Name
12/31/2020	2020 Post Construction Enforcement

Description

The City of Detroit Lakes is required to develop and implement adequate enforcement authority for post construction activity that takes place within the boundaries of the Municipal Separate Storm Sewer System. Attached is the procedures for Post Construction management.

File Attachment [*Post Construction ERP.pdf*](#)

5.2.2 Maintain Post-Construction Stormwater Management Review Procedures

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Review post-construction stormwater management review procedures annually and update as necessary to maintain an effective program in compliance with all permit requirements.

Summarize any planned or completed revisions to the post-construction management site design review procedures each reporting period and provide a copy of or link to the current procedures.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
<hr/>		
None		
<hr/>		

5.2.3 Implement Post-Construction Stormwater Management Site Plan Review Program

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Implement the post-construction stormwater management site review procedures for all new projects subject to the permit and ordinance requirements.

Summarize site design reviews initiated or completed each reporting period. For each site plan review include the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance. Also provide copies of any documentation associated with approved mitigation projects.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
<hr/>		
None		
<hr/>		

5.3 Post Construction Stormwater Management

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Required No

Description

Manage the MS4s post construction stormwater management activities, including the following activities.

1. Identify the name(s) or position(s) responsible for implementing and/or coordinating the Post Construction Stormwater management program.
2. Record the number of structural and non-structural BMPs installed annually.
3. Incorporate new facilities in the City storm water data base and MS4 map annually. (See MCM 3)
4. Record maintenance agreements on new privately owned BMPs to assure long-term maintenance.

Goals

5.3.1 Responsible Person(s) - Post Construction Stormwater Management

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Identify the position(s) or individual(s) responsible for implementing and/ or coordinating post construction stormwater management requirements in accordance with the permit requirements and City of Detroit Lakes procedures.

Provide the individual(s) name(s) each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2019

Activity Date	Name
12/31/2020	2020 Post Construction Stormwater Management Responsible Person

Description

City Administrator, Kelcey Klemm, and Community Development Director, Larry Remmen, are responsible for implementing and/or coordinating the City of Detroit Lakes post construction stormwater management program in 2020.

5.3.2 BMP Inventory

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Maintain an inventory of all structural and non-structural BMPs installed in the MS4, including annual updates.

Provide a copy of or reference to the current list, updated each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2017

Activity Date	Name	Description
None		

5.3.3 BMP Maintenance Agreements

Responsible Staff / Position: Priscilla Gurath
Code Compliance Official
(218) 846-7122

Description

Record the number of new private stormwater management systems or BMPs where maintenance agreements have been completed.

Provide a listing of new systems and BMPs installed, name of party responsible for maintaining the BMP, and copy of or reference to the completed maintenance agreement each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

6 MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

New permittees shall develop and implement, and **existing permittees** shall revise their current program, as necessary, and continue to implement, an operations and maintenance program that prevents or **reduces** the discharge of pollutants from **permittee** owned/operated facilities and operations to the **small MS4**. The operations and maintenance program shall include, at a minimum, the following:

a. Facilities Inventory

The **permittee** shall develop and maintain an inventory of **permittee** owned/operated facilities that contribute pollutants to **stormwater** discharges. Facilities to be inventoried may include, but is not limited to: composting, equipment storage and maintenance, hazardous waste disposal, hazardous waste handling and transfer; landfills, solid waste handling and transfer, parks, pesticide storage, public parking lots, public golf courses; public swimming pools, public works yards, recycling, salt storage, vehicle storage and maintenance (e.g., fueling and washing) yards, and materials storage yards.

b. Development and Implementation of BMPs for inventoried facilities and municipal operations

Considering the source of pollutants and sensitivity of **receiving waters** (e.g., Outstanding Resource Value Waters (ORVWs), **impaired waters**, trout streams, etc.), the **permittee** shall develop and implement **BMPs** that prevent or **reduce** pollutants in **stormwater** discharges from the **small MS4** and from:

- (1) All inventoried facilities that discharge to the **MS4**, and
- (2) The following municipal operations that may contribute pollutants to stormwater discharges, where applicable:
 - (a) Waste disposal and storage, including dumpsters
 - (b) Management of temporary and permanent stockpiles of materials such as street sweepings, snow, deicing materials (e.g., salt), sand and sediment removal piles
 - (c) Vehicle fueling, washing and maintenance
 - (d) Routine street and parking lot sweeping
 - (e) Emergency response, including spill prevention plans
 - (f) Cleaning of maintenance equipment, building exteriors, dumpsters, and the disposal of associated waste, and wastewater
 - (g) Use, storage, and disposal of **significant materials**
 - (h) Landscaping, park, and lawn maintenance
 - (i) Road maintenance, including pothole repair, road shoulder maintenance, pavement marking, sealing, and repaving
 - (j) Right-of-way maintenance, including mowing
 - (k) Application of herbicides, pesticides, and fertilizers
 - (l) Cold-weather operations, including plowing or other snow removal practices, sand use, and application of deicing compounds

c. Development and implementation of **BMPs** for **MS4** discharges that may affect Source Water Protection Areas (Minn. R. 4720.5100-4720.5590)

The **permittee** shall incorporate **BMPs** into the **SWPPP** to protect any of the following drinking water sources that the **MS4** discharge may affect, and the **permittee** shall include the map of these sources with the **SWPPP** if they have been mapped:

- (1) Wells and source waters for DWSMAs identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330

(2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health (MDH) under the federal Safe Drinking Water Act, U.S.C. SubSection 300j - 13
d. Pond Assessment Procedures and Schedule

The **permittee** shall develop procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all **permittee** owned/operated ponds constructed and used for the collection and treatment of **stormwater**. The schedule (which may exceed this permit term) shall be based on measureable goals and priorities established by the **permittee**.

e. Inspections

(1) Unless inspection frequency is adjusted as described below, the **permittee** shall conduct annual inspections of **structural stormwater BMPs** (excluding **stormwater** ponds which are under a separate schedule below) to determine structural integrity, proper function and maintenance needs.

Inspections of **structural stormwater BMPs** shall be conducted annually unless the **permittee** determines if either of the following conditions apply: 1) Complaints received or patterns of maintenance indicate a greater frequency is necessary, or 2) Maintenance or sediment removal is not required after completion of the first two annual inspections; in which case the **permittee** may reduce the frequency of inspections to once every two (2) years. However, **existing permittees** are authorized under this permit to continue using inspection frequency adjustments, previously determined under the *general stormwater permit/or small MS4s No. MNR040000*, effective June 1, 2006, provided that documentation requirements in Part III.D.6.h(2) are satisfied.

(2) Prior to the expiration date of this permit, the **permittee** shall conduct at least one inspection of all ponds and **outfalls** (excluding underground **outfalls**) in order to determine structural integrity, proper function, and maintenance needs.

(3) The **permittee** shall conduct quarterly inspections of stockpiles, and storage and material handling areas as inventoried in Part III.D.6.a, to determine maintenance needs and proper function of **BMPs**.

f. Maintenance

Based on inspection findings, the **permittee** shall determine if repair, replacement, or maintenance measures are necessary in order to ensure the structural integrity, proper function, and treatment effectiveness of **structural stormwater BMPs**. Necessary maintenance shall be completed as soon as possible to prevent or reduce the discharge of pollutants to stormwater.

g. Employee Training

The **permittee** shall develop and implement a **stormwater** management training program commensurate with employee's job-duties as they relate to the **permittee's SWPPP**, including reporting and assessment activities. The **permittee** may use training materials from the United States Environmental Protection Agency (USEPA), state and regional agencies, or other organizations as appropriate to meet this requirement. The employee training program shall:

(1) Address the importance of protecting water quality

(2) Cover the requirements of the permit relevant to the job duties of the employee

(3) Include a schedule that establishes initial training for new and/or seasonal employees, and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements

h. Documentation of the following information:

(1) Date(s) and description of findings of all inspections conducted in accordance with Part III.D.6.e

- (2) Any adjustments to inspection frequency as authorized under Part III.D.6.e(1)
- (3) A description of maintenance conducted, including dates, as a result of inspection findings
- (4) Pond sediment excavation and removal activities, including:
 - (a) The unique ID number (consistent with that required in Part III.C.2.a) of each **stormwater** pond from which sediment is removed
 - (b) The volume (e.g., cubic yards) of sediment removed from each **stormwater** pond
 - (c) Results from any testing of sediment from each removal activity
 - (d) Location(s) of final disposal of sediment from each **stormwater** pond
- (5) Employee **stormwater** management training events, including a list of topics covered, names of employees in attendance, and date of each event

Best Management Practices

6.1 (a) Facilities Inventory

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

6.a: Develop and maintain an inventory of permittee owned/ operated facilities that contribute pollutants to stormwater discharges.

Facilities to be inventoried may include, but are not limited to: composting, equipment storage and maintenance, hazardous waste disposal, hazardous waste handling and transfer; landfills, solid waste handling and transfer, parks, pesticide storage, public parking lots, public golf courses; public swimming pools, public works yards, recycling, salt storage, vehicle storage and maintenance (e.g., fueling and washing) yards, and materials storage yards.

Goals

6.1.1 MS4 Facilities Inventory

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Prepare and maintain an inventory of facilities currently owned and/ or operated by the MS4 that contribute pollutants to stormwater discharges.

Provide a copy of or link to the completed and updated inventory each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Activity Date	Name
12/07/2020	2020 Facility Inventory Form

Description

Prepare and maintain an inventory of facilities currently owned and/ or operated by the MS4 that contribute pollutants to stormwater discharges.

Provide a copy of or link to the completed and updated inventory each reporting period.

File Attachment [Facility_Inventory_Form.xlsx](#)

6.2 (b) BMPs for Municipal Facilities and Operations

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

6.b: Develop and implement BMPs that prevent or reduce pollutants in stormwater discharges from the small MS4 and from:

1. All inventoried facilities that discharge to the MS4, and
2. The following municipal operations that may contribute pollutants to stormwater discharges, where applicable:
 - (a) Waste disposal and storage, including dumpsters
 - (b) Management of temporary and permanent stockpiles of materials such as street sweepings, snow, deicing materials (e.g., salt), sand and sediment removal piles
 - (c) Vehicle fueling, washing and maintenance
 - (d) Routine street and parking lot sweeping
 - (e) Emergency response, including spill prevention plans
 - (f) Cleaning of maintenance equipment, building exteriors, dumpsters, and the disposal of associated waste, and wastewater
 - (g) Use, storage, and disposal of significant materials
 - (h) Landscaping, park, and lawn maintenance
 - (i) Road maintenance, including pothole repair, road shoulder maintenance, pavement marking, sealing, and repaving
 - (j) Right-of-way maintenance, including mowing
 - (k) Application of herbicides, pesticides, and fertilizers
 - (l) Cold-weather operations, including plowing or other snow removal practices, sand use, and application of deicing compounds

Goals

6.2.1 Inventoried Facilities BMPs

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop and implement BMPs that prevent or reduce pollutant in stormwater discharges from facilities currently inventoried and identified, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current facility SWPPP for each inventoried facility initiated or completed each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2019

Activity Date	Name	Description
None		

6.2.2 Waste Disposal and Storage BMPs

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from waste disposal and storage operations, including dumpsters, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2019

Activity Date	Name	Description
None		

6.2.3 Material Stockpile BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater resulting from management of temporary and permanent stockpiles of materials such as street sweepings, snow, deicing materials, sand and sediment removal piles, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2019

Activity Date	Name	Description
None		

6.2.4 Vehicle Fueling, Washing and Maintenance BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from vehicle fueling, washing and maintenance operations, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2019

Activity Date	Name	Description
None		

6.2.5 Street/ Parking Lot Sweeping

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop, implement and maintain routine sweeping BMPs to prevent or reduce pollutant discharges to stormwater from streets and parking lots, considering the source of pollutants and sensitivity of receiving waters.

Document the frequency and dates of sweeping, the number of miles swept and the amount of material collected annually.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A

Activity Date	Name	Description
None		

6.2.6 Emergency Response Plans

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop, implement and maintain emergency response plans with BMPs to prevent or reduce pollutant discharges to stormwater from spills of pollutants, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current plan as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2019

Activity Date	Name	Description
None		

6.2.7 Cleaning Activity BMPs

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from cleaning of maintenance equipment, building exteriors, dumpsters and the disposal of associated waste and wastewater, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2019

Activity Date	Name	Description
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None

6.2.8 Significant Material BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from use, storage and disposal of significant materials, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

6.2.9 Landscaping BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from landscaping, park and lawn maintenance, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2019

Activity Date	Name	Description
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None

6.2.10 Road Maintenance BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from road maintenance activities, including pothole repair, road shoulder maintenance, pavement marking, sealing and repaving, all considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2019

Activity Date	Name	Description
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None

6.2.11 Right-of-Way Maintenance BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from right-of-way maintenance, including mowing, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2019

Activity Date	Name	Description
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None

6.2.12 Herbicide, Pesticide and Fertilizer BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from use of herbicides, pesticides and fertilizers, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

6.2.13 Cold Weather Operation BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain BMPs to prevent or reduce pollutant discharges to stormwater from cold weather operations, including plowing or other snow removal practices, sand use and application of deicing compounds, considering the source of pollutants and sensitivity of receiving waters.

Provide a copy of or link to the current BMPs as described.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2019

Activity Date	Name	Description
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None

6.2.14 Catch Basin Cleaning

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop, implement and maintain BMPs for cleaning of storm sewer catch basins, including procedures for removal and proper disposal of removed materials.

Document the number of catch basins cleaned and estimated amount of material removed each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

6.2.15 Storm Sewer System Inspection and Cleaning

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Develop, implement and maintain BMPs for inspection and cleaning of storm sewers, including procedures for removal and proper disposal of removed materials.

Document the length of storm sewer system cleaned and estimated amount of material removed each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

6.3 (c) BMPs for Source Water Protection

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Required Yes

Description

6.c: ****CONFIRM DOES NOT APPLY TO DETROIT LAKES****

Incorporate BMPs into the SWPPP to protect any of the following drinking water sources that the MS4 discharge may affect. Include the map of these sources with the SWPPP if they have been mapped:

1. Wells and source waters for DWSMAs identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330
2. Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health (MDH) under the federal Safe Drinking Water Act, U.S.C. SubSection 300j - 13

Goals

6.3.1 Well/ Source Water Protection

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

**** CONFIRM DOES NOT APPLY TO DETROIT LAKES ****

Develop and implement BMPs to protect wells and source waters for DWSMAs identified as vulnerable under Minn R. 4720.5205, 4720.5210 and 4720.5330 and that the MS4 discharge may affect.

Provide a copy of or link to the required BMPs each reporting period, including the map of these sources with the SWPPP if they have been mapped.

Activity Date	Name	Description
None		

6.3.2 Surface Source Water Protection

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

**** CONFIRM DOES NOT APPLY TO DETROIT LAKES ****

Develop and implement BMPs to protect surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health (MDH) under the federal Safe Drinking Water Act. U.S.C. Subsection 300j-13.

Provide a copy of or link to the required BMPs each reporting period, including the map of these sources with the SWPPP if they have been mapped.

Activity Date	Name	Description
None		

6.4 (d) Pond Assessment Procedures and Schedule

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

6.d: Develop procedures and a schedule to determine the TSS and TP treatment effectiveness of all permittee owned/ operated ponds constructed and used for the collection and treatment of stormwater. The schedule shall be based on measurable goals and priorities established by the permittee.

Goals

6.4.1 Develop Pond Assessment Procedures and Schedule

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop procedures and a schedule to determine the TSS and TP treatment effectiveness of all permittee owned/ operated ponds constructed and used for the collection and treatment of stormwater. The schedule shall be based on measurable goals and priorities established by the permittee. Adopt and implement the initial procedures within 12 months of the date coverage is extended and review annually.

Provide a copy of or link to the current resulting procedure and schedules each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

6.4.2 Pond Assessments

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Conduct pond assessments to determine TSS and TP treatment effectiveness in accordance with the adopted procedures and schedule.

Provide a summary of pond assessments completed each reporting period including a list of inspected ponds.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

6.4.2 Pond Assessments
Responsible Staff / Position:

Description

Conduct pond assessments to determine TSS and TP treatment effectiveness in accordance with the adopted procedures and schedule.

Provide a summary of pond assessments completed each reporting period including a list of inspected ponds.

Activity Date	Name	Description
None		

6.5 (e) Inspections - Structural Stormwater BMPs

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Required Yes

Description

6.e: (1) Conduct annual inspections of all structural stormwater BMPs (excluding stormwater ponds which are under a separate schedule below) to determine structural integrity, proper function and maintenance needs.

Inspections of structural stormwater BMPs shall be conducted annually unless the permittee determines if either of the following conditions apply:

1) Complaints received or patterns of maintenance indicate a greater frequency is necessary, or
2) Maintenance or sediment removal is not required after completion of the first two annual inspections; in which case the permittee may reduce the frequency of inspections to once every two (2) years.
However, existing permittees are authorized under this permit to continue using inspection frequency adjustments, previously determined under the general storm water permit/or small MS4s NO.MNR040000, effective June 1, 2006, provided that documentation requirements in Part III.D.6.h(2) are satisfied.

(2) Conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs prior to the expiration date of this permit

(3) Conduct quarterly inspections of stockpiles, and storage and material handling areas as inventoried in Part III.D.6.a, to determine maintenance needs and proper function of BMPs.

Goals

6.5.1 Annual Inspections - Structural Stormwater BMPs

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Conduct annual inspections of structural stormwater BMPs to determine structural integrity, proper function and maintenance needs. Adjust the inspection frequency per existing permit terms and conditions.

Provide dates and findings of all inspections, a summary of adjustments to inspection frequency, and a description of maintenance conducted, including dates, as a result of inspection findings each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name	Description
None		

6.5.2 Inspections - Ponds and Outfalls

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Conduct annual inspection of at least 20% all ponds and outfalls (excluding underground outfalls) to determine structural integrity, proper function and maintenance needs prior to expiration of this permit.

Provide dates and findings of all inspections, a summary of adjustments to inspection frequency, and a description of maintenance conducted, including dates, as a result of inspection findings each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

6.5.3 Quarterly Inspections - Stockpiles

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Conduct quarterly inspections of stockpiles, and inventoried storage and material handling areas to determine maintenance needs and proper function of BMPs.

Provide dates and findings of all inspections, a summary of adjustments to inspection frequency, and a description of maintenance conducted, including dates, as a result of inspection findings each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2019

Activity Date	Name	Description
None		

6.6 (f) Maintenance - Structural Stormwater BMPs

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Required Yes

Description

6.f: Determine if repair, replacement, or maintenance measures are necessary based on inspection findings to ensure the structural integrity, proper function, and treatment effectiveness of structural stormwater BMPs. Complete necessary maintenance as soon as possible to prevent or reduce the discharge of pollutants to stormwater.

Goals

6.6.1 Structural Stormwater BMP Maintenance

Responsible Staff / Position: Tom Gulon
Park and Arena Supervisor
(218) 846-7140

Description

Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.

Provide a description of maintenance conducted, including dates, as a result of inspection findings.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017 2018 A 2018 B 2019

Activity Date	Name	Description
None		

6.6.2 Annual Inspection Evaluation

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Re-evaluate inspection schedule and frequencies following annual reporting results.

Summarize conclusions reached and changes implemented following annual inspection schedule and frequency re-evaluation each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

6.7 (g) Municipal Employee Training

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Required Yes

Description

6.g: Develop and implement a stormwater management training program commensurate with employee's job-duties as they relate to the permittee's SWPPP, including reporting and assessment activities. The permittee may use training materials from the United States Environmental Protection Agency (USEPA), state and regional agencies, or other organizations as appropriate to meet this requirement. The employee training program shall:

1. Address the importance of protecting water quality
2. Cover the requirements of the permit relevant to the job duties of the employee
3. Include a schedule that establishes initial training for new and/or seasonal employees, and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements

Goals

6.7.1 Develop Municipal Employee Training Program

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop a municipal employee stormwater management training program commensurate with employees' job-duties as they relate to the MS4s SWPPP, as described. Review the training program annually and update as necessary to maintain training effectiveness.

Provide a copy of or link to the current employee stormwater management training program each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

6.7.2 Conduct Initial Training

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Conduct stormwater management training for new and/ or seasonal employees commensurate with their job-duties as they relate to the stormwater SWPPP.

Provide a summary of each training session, including the date of the event, list of topics covered and names of employees in attendance.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

6.7.2 Conduct Initial Training

Responsible Staff / Position:

Description

Conduct stormwater management training for new and/ or seasonal employees commensurate with their job-duties as they relate to the stormwater SWPPP.

Provide a summary of each training session, including the date, agenda, copy of training materials and names of participants.

Activity Date	Name	Description
None		

6.7.3 Conduct Recurring Training

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Conduct stormwater management training on an on-going, recurring interval basis for existing employees to address changes in procedures, practices, techniques or requirements.

Provide a summary of each training session, including the date of the event, list of topics covered and names of employees in attendance.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
None		

6.8 (h) Pollution Prevention/ Good Housekeeping Program Management

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Required No

Description

6.h: Provide program management for required pollution prevention/ good housekeeping for municipal operations activities required per Permit Part III.D.6, and including:

- Definition and conformance with documentation requirements to meet permit requirements in Permit Park III.D.6.h.
- Consideration of a comprehensive database management system to support the program.
- Identification of a person(s) or position(s) responsible for implementation and/ or coordination of this program.

Goals

6.8.1 Pollution Prevention/ Good Housekeeping Program Documentation Procedures

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop, implement and maintain documentation procedures to support the pollution prevention/ good housekeeping program as required in Permit Part III.D.6.h within twelve months of the date permit coverage is extended.

Review the program annually, and revise as necessary to maintain permit compliance.

Provide a copy of or reference to the approved documentation procedures each reporting period.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

6.8.2 Database Management System Develop

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Develop a mapping and comprehensive database management system to accommodate all City storm sewer system infrastructure.

Planned: 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2014 2015 2016 2017

Activity Date	Name	Description
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None

6.8.3 Responsible Person - Pollution Prevention/ Good Housekeeping

Responsible Staff / Position: Shawn King
Public Works Director
(218) 847-4637

Description

Identify the position(s) or individual(s) responsible for implementing and/ or coordinating pollution prevention and good housekeeping of municipal facilities activities in accordance with the Permit Part III.D.6 and City of Detroit Lakes procedures.

Provide the individual(s) name(s) each reporting period.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2019

Activity Date	Name	Description
None		

7 MCM Discharge to Impaired Waters (NOT IN CURRENT PERMIT)

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Discharges to **Impaired Waters** with a USEPA-Approved **TMDL** that includes and **Applicable WLA**

For each **applicable WLA** approved prior to the **effective date** of this permit, the **BMPs** included in the compliance schedule at application constitute a discharge requirement for the **permittee**. The **permittee** shall demonstrate continuing progress toward meeting each discharge requirement, on a form provided by the **Commissioner**, by submitting the following:

1. An assessment of progress toward meeting each discharge requirement, including a list of all **BMPs** being applied to achieve each **applicable WLA**. For each **structural stormwater BMP**, the **permittee** shall provide a unique identification (ID) number and **geographic coordinate**. If the listed **structural stormwater BMP** is also inventoried as required by Part III.C.2, the same ID number shall be used.
2. A list of all **BMPs** the **permittee** submitted at the time of application in the **SWPPP** document compliance schedule(s) and the stage of implementation for each **BMP**, including any **BMPs** specifically identified for the **small MS4** in the **TMDL** report that the **permittee** plans to implement
3. An up-dated estimate of the cumulative reductions in loading achieved for each **pollutant of concern** associated with each **applicable WLA**
4. An up-dated narrative describing any adaptive management strategies used (including projected dates) for making progress toward achieving each **applicable WLA**

Best Management Practices

7.A-1 Discharge Requirement Discharge Assessment

Responsible Staff / Position:

Required Yes

Description

Provide an assessment of progress toward meeting each discharge requirement, including a list of all BMPs being applied to achieve each applicable WLA.

For each structural stormwater BMP, provide a unique identification (ID) number and geographic coordinate. (If the listed structural stormwater BMP is also inventoried as required by Part III.C.2, the same ID number shall be used.)

Goals

7.A-1.1 Discharge Assessment - WLA "A"

Responsible Staff / Position:

Description

Assess progress toward meeting the identified discharge requirement each reporting period.

Provide the results of the assessments including a list of all BMPs applied to the applicable WLA.

Activity Date	Name	Description
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None

7.B-2 BMP Implementation Stage

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Provide a list of all BMPs submitted at the time of application in the SWPPP document compliance schedule(s) and the stage of implementation for each BMP, including any BMPs specifically identified for the small MS4 in the TMDL report to be implemented.

Goals

None

Activity Date	Name	Description
None		

7.C-3 Estimated Pollutant Loading Reduction

Responsible Staff / Position:

Required Yes

Description

Provide an up-dated estimate of the cumulative reductions in loading achieved for each pollutant of concern associated with each applicable WLA.

Goals

None

Activity Date

Name

Description

None

7.D-4 Adaptive Management Strategy

Responsible Staff / Position:

Required Yes

Description

Provide an up-dated narrative describing any adaptive management strategies used (including projected dates) for making progress toward achieving each applicable WLA.

Goals

None

Activity Date	Name	Description
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None

8 Annual SWPPP Assessment, Annual Reporting, and Record Keeping

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Description

A. Annual SWPPP Assessment

The **permittee** shall conduct an Annual Assessment of their **SWPPP** to determine program compliance, the appropriateness of **BMPs**, and progress towards achieving the measurable goals identified in their **SWPPP** document. The Annual **SWPPP** Assessment shall be performed prior to completion of each Annual Report.

B. Annual Reporting

The **permittee** shall submit an Annual Report to the **Agency** by June 30th of each calendar year. The Annual Report shall cover the portion of the previous calendar year during which the **permittee** was authorized to discharge **stormwater** under this permit. The Annual Report shall be submitted to the **Agency**, on a form provided by the **Commissioner**, that will at a minimum, consist of the following:

1. The status of compliance with permit terms and conditions, including an assessment of the appropriateness of **BMPs** identified by the **permittee** and progress towards achieving the identified measurable goals for each of the MCMs in Part III.D.1-6. The assessment must be based on results of information collected and analyzed, including monitoring (if any), inspection findings, and public input received during the reporting period.

2. The **stormwater** activities the **permittee** plans to undertake during the next reporting cycle

3. A change in any identified **BMPs** or measurable goals for any of the MCMs in Part III.D.1-6

4. Information required in Part III.E, to demonstrate progress in meeting **applicable**

WLAs

5. Information required to be recorded or documented in Part III

6. A statement that the **permittee** is relying on a partnership(s) with another regulated **Small MS4(s)** to satisfy one or more permit requirements (if applicable), and what agreements the permittee has entered into in support of this effort.

C. Record Keeping

1. The **permittee** shall keep records required by the **NPDES** permit for at least three (3) years beyond the term of this permit. The **permittee** shall submit records to the **Commissioner** only if specifically asked to do so.

2. The **permittee** shall make records, including components of the **SWPPP**, available to the public at reasonable times during regular business hours (see 40 CFR 122.7 for confidentiality provision).

3. The **permittee** shall retain copies of the permit application, all documentation necessary to comply with **SWPPP** requirements, all data and information used by the **permittee** to complete the application process, and any information developed as a requirement of this permit or as requested by the **Commissioner**, for a period of at least three (3) years beyond the date of permit expiration. This period is automatically extended during the course of an unresolved enforcement action regarding the **small MS4** or as requested by the **Commissioner**.

Best Management Practices

8.1 Annual SWPPP Assessment

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Conduct an Annual Assessment of the **SWPPP** to determine program compliance, the appropriateness of **BMPs**, and progress towards achieving the measurable goals identified in the **SWPPP** document prior to completion of each Annual Report.

Goals

8.1.1 Annual Review of SWPPP Document

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Annual Review of SWPPP document and discussion on Minimum Control Measures.

Planned: 2018 A 2018 B 2019

Complete: 2018 A 2018 B 2019

Activity Date	Name
12/31/2020	2020 Annual Review of SWPPP Document

Description

During 2020, there was multiple meetings held with staff to discuss the SWPPP documents and setting goals for the year. Attached are notes from each of the meetings.

File Attachment [2020-01-16 Staff Memo.docx](#)

File Attachment [2020-10-08 MS4 Packet.pdf](#)

File Attachment [2020-10-08 Staff Meeting Memo.docx](#)

8.3 Record Keeping

Responsible Staff / Position: Kelcey Klemm
City Administrator
(218) 847-5658

Required Yes

Description

1. Keep records required by the NPDES permit for at least three (3) years beyond the term of this permit. Submit records to the Commissioner only if specifically asked to do so.

2. Make records, including components of the SWPPP, available to the public at reasonable times during regular business hours (see 40 CFR 122.7 for confidentiality provision).

3. Retain copies of the permit application, all documentation necessary to comply with SWPPP requirements, all data and information used to complete the application process, and any information developed as a requirement of this permit or as requested by the Commissioner, for a period of at least three (3) years beyond the date of permit expiration. This period is automatically extended during the course of an unresolved enforcement action regarding the small MS4 or as requested by the Commissioner.

Goals

None

Activity Date	Name	Description
None		

8.B-2 Annual Report

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Required Yes

Description

Submit an Annual Report to the Agency by June 30th of each calendar year for the portion of the previous calendar year during which the permittee was authorized to discharge stormwater under this permit. Submit the Annual Report to the Agency on a form provided by the Commissioner that at a minimum consists of the following:

1. The status of compliance with permit terms and conditions, including an assessment of the appropriateness of BMPs identified by the permittee and progress towards achieving the identified measurable goals for each of the MCMs in Part III.D.1-6. The assessment must be based on results of information collected and analyzed, including monitoring (if any), inspection findings, and public input received during the reporting period.
2. The stormwater activities the permittee plans to undertake during the next reporting cycle
3. A change in any identified BMPs or measurable goals for any of the MCMs in Part III.D.1-6
4. Information required in Part III.E, to demonstrate progress in meeting applicable WLAs
5. Information required to be recorded or documented in Part III
6. A statement that the permittee is relying on a partnership(s) with another regulated Small MS4(s) to satisfy one or more permit requirements (if applicable), and what agreements the permittee has entered into in support of this effort.

Goals

8.B-2.1 Apply for Permit Reauthorization

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Submit a certified copy of the MS4 SWPPP Application for Reauthorization for the NPDES/SDS General Small Municipal Separate Storm Sewer System (MS4) Permit MNR040000 reissued with and effective date of August 1, 2013 via email to ms4permitprogram.pca@state.mn.us.

Planned: 2013

Complete: 2013

Activity Date	Name	Description
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None

8.B-2.2 MS4 Annual Reports

Responsible Staff / Position: Larry Remmen
Community Development Director
(218) 846-7125

Description

Complete and submit required MS4 annual reporting requirements for each reporting year by June 30.

Provide a copy of the completed MS4 Annual Report form and a copy of the City of Detroit Lakes comprehensive SWPPP annual report.

Planned: 2013 2014 2015 2016 2017 2018 A 2018 B 2019 2020

Complete: 2013 2014 2015 2016 2017 2019

Activity Date	Name	Description
None		
