

## **City of Detroit Lakes SWPPP 2021-25**

**November 16, 2020 To December 31, 2026**

This program consists of the following 25 Minimum Control Measure(s).

1. (9.1-14.2) Permit Application Requirements
16. MCM 1: Public Education and Outreach
17. MCM 2: Public Participation/ Involvement
18. MCM 3: Illicit Discharge Detection and Elimination (IDDE)
19. MCM 4: Construction Site Stormwater Runoff Control
20. MCM 5: Post-Construction Stormwater Management
21. MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations
22. Discharge to Impaired Waters
25. Annual SWPPP Assessment, Annual Reporting, and Record Keeping

# 1 (9.1-14.2) Permit Application Requirements

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

## **Description:**

Permit applications are required for new applicants as well as existing permittees, along with other items specified in the MS4 general permit, as follows (with reference to permit sections):

Application for Reissuance (9.1): If an existing permittee desires to continue permit coverage beyond the expiration date, the permittee must submit an application for permit reissuance: Due by 180 days prior to permit expiration. [Minn. R. 7001.0040, Subp. 3]

- **New Permittee Applicants: (10.1-10.2)** To become a new permittee authorized to discharge stormwater under the General Permit, the owner/operator of a small MS4 must submit an application, on a form provided by the Agency, in accordance with the schedule in Appendix B, Table 3, and the following requirements: a. submit Part 1 of the permit application (includes the permit application fee); and b. submit Part 2 of the permit application, also known as the Stormwater Pollution Prevention Program (SWPPP) document, in accordance with Section 12.
- **Existing Permittee Applicants: (11.1-11.2)** All existing permittees seeking to continue discharging stormwater associated with a small MS4 after the issuance date of the General Permit must submit Part 2 of the permit application: Due by 150 days after permit issuance. Existing permittees were required to submit Part 1 of the permit application prior to the expiration date (July 31, 2018) of the Agency's small MS4 general permit No.MNR040000, effective August 1, 2013.
- **Stormwater Pollution Prevention Program (SWPPP) Document: (12.1-12.2)** All applicants must submit a SWPPP Document (i.e., Part 2 of the permit application) when seeking coverage under the General Permit. The SWPPP Document will become an enforceable part of the General Permit upon approval by the Agency. Modifications to the SWPPP Document that are required or allowed by the General Permit (see Section 24) will also become enforceable provisions. The applicant must submit the SWPPP Document on a form provided by the Agency. The applicant's SWPPP Document must include items 12.3 through 12.11, as applicable.
- **Stormwater Pollution Prevention Program (SWPPP): (13.1-13.2)** The permittee must develop, implement, and enforce a SWPPP designed to reduce the discharge of pollutants from the small MS4 to the Maximum Extent Practicable (MEP) and to protect water quality. Existing permittees regulated within the urbanized area as defined by the United States Census Bureau, the applicable urbanized area for which the permittee must develop, implement, and enforce a SWPPP can be based on the most recent decennial census of 2010 for the duration of the General Permit.
- **Mapping: (14.1-14.2)** New permittees must develop, and existing permittees must update, as necessary, a storm sewer system map that depicts the following:
  - a. the permittee's entire 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 coordinates;
  - c. structural stormwater BMPs that are part of the permittee's MS4; and
  - d. all receiving waters.

## Best Management Practices

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### 1.10 Permit Application Documents

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

**Required:** Yes

#### Description

##### 9.1 Application for Reissuance.

9.2 If an existing permittee desires to continue permit coverage beyond the expiration date, the permittee must submit an application for permit reissuance: Due by 180 days prior to permit expiration. [Minn. R. 7001.0040, Subp. 3]

##### 10.1 New Permittee Applicants.

10.2 To become a new permittee authorized to discharge stormwater under the General Permit, the owner/operator of a small MS4 must submit an application, on a form provided by the Agency, in accordance with the schedule in Appendix B, Table 3, and the following requirements: a. submit Part 1 of the permit application (includes the permit application fee); and b. submit Part 2 of the permit application, also known as the Stormwater Pollution Prevention Program (SWPPP) document, in accordance with Section 12.

##### 11.1 Existing Permittee Applicants.

11.2 All existing permittees seeking to continue discharging stormwater associated with a small MS4 after the issuance date of the General Permit must submit Part 2 of the permit application: Due by 150 days after permit issuance. Existing permittees were required to submit Part 1 of the permit application prior to the expiration date (July 31, 2018) of the Agency's small MS4 general permit No.MNR040000, effective August 1, 2013.

#### Goals

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##### 1.10.1 Permit Application

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

#### Description

Provide a copy of the permit application documents as required in Permit Articles 9.1 through 11.2, as appropriate.

**Planned:** 2021

**Complete:** 2021

Activity Date	Name	Description
04/14/2021	MS4 Part 2 Permit Application	MS4 Part Permit Application

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## 1.12 Stormwater Pollution Prevention Program (SWPPP) Document

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

**Required:** Yes

### Description

In accordance with Article 12.1-12.2, all applicants must submit a SWPPP Document when seeking coverage under the General Permit. Specific requirements for the SWPPP document are stated in Permit Articles 12.1 - 12.11. The SWPPP document submittal is required by April 15, 2021.

### Goals

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#### 1.12.1 SWPPP Document

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

### Description

Provide a copy of the SWPPP Document submitted in accordance with permit requirements stated in Articles 12.1-12.11. The SWPPP document submittal is required in accordance with the schedule stated in the permit for existing permittees or new applicants.

**Planned:** 2021

**Complete:** 2021

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
04/14/2021	MS4 Part 2 Permit Application	Per permit, 12.2 states all applicants must submit a SWPPP document (i.e. Part 2 of the permit application).

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### 1.13 (SWPPP) Stormwater Pollution Prevention Program

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

**Required:** Yes

#### Description

In accordance with Articles 13.1-13.4, all applicants must develop, implement and enforce a SWPPP designed to reduce the discharge of pollutants from the small MS4 to the Maximum Extent Practicable (MEP) and to protect water quality. The revised or new SWPPPs must be developed or updated in accordance with the schedule presented in Appendix B, Table 2 or Appendix B, Table 3, respectively.

#### Goals

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##### 1.13.1 SWPPP Program

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

#### Description

Confirm ongoing implementation and enforcement of a SWPPP in accordance with the permit requirements.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
05/25/2022	SWPPP	PermiTrack was updated in 2022 to reflect the new permit requirements and established new goals and objectives to comply with the permit.  An annual SWPPP (PermiTrack) report can be found on the City's website. Storm Water (MS4) - Detroit Lakes, MN ( <a href="http://cityofdetroitlakes.com">cityofdetroitlakes.com</a> )

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## 1.14 Mapping

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

**Required:** Yes

### Description

Permittees must develop and maintain, or update, as necessary a storm sewer system map that depicts all features and requirements stated in Articles 14.1-14.2 of the permit.

### Goals

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#### 1.14.1 Mapping

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

### Description

Provide a copy of, or link to, current mapping of the MS4's storm sewer system in accordance with permit requirements stated in Articles 14.1-14.2. Provide a short summary of update efforts completed through the current reporting period.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
01/07/2021	2021 Storm Water Map	Storm Water Map with updates. Full map can be found on GIS.  Save as MCM 3: 18.3.
01/01/2022	Same as 18.3	Storm Water Maps uploaded under 18.3

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## 16 MCM 1: Public Education and Outreach

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

### **Description:**

#### **16.1 Public Education and Outreach.**

**16.2** New permittees must develop and implement, and existing permittees must 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 waterbodies and that includes actions citizens, businesses, and other local organizations can take to reduce the discharge of pollutants to stormwater. The permittee may use existing materials if they are appropriate for the message the permittee chooses to deliver, or the permittee may develop its own educational materials. The permittee may partner with other MS4 permittees, community groups, watershed management organizations, or other groups to implement its education and outreach program. The permittee must incorporate Section 16 requirements into their program.

**16.3** During the permit term, the permittee must distribute educational materials or equivalent outreach focused on at least two (2) specifically selected stormwater-related issues of high priority to the permittee (e.g., specific TMDL reduction targets, changing local business practices, promoting adoption of residential BMPs, lake improvements through lake associations, household chemicals, yard waste, etc.). The topics must be different from those described in items 16.4 through 16.6.

**16.4** At least once each calendar year, the permittee must distribute educational materials or equivalent outreach focused on illicit discharge recognition and reporting illicit discharges to the permittee.

**16.5** For cities and townships, at least once each calendar year, the permittee must distribute educational materials or equivalent outreach to residents, businesses, commercial facilities, and institutions, focused on the following:

- a. impacts of deicing salt use on receiving waters;
- b. methods to reduce deicing salt use; and
- c. proper storage of salt or other deicing materials.

**16.6** For cities and townships, at least once each calendar year, the permittee must distribute educational materials or equivalent outreach focused on pet waste. The educational materials or equivalent outreach must include information on the following: a. impacts of pet waste on receiving waters; b. proper management of pet waste; and c. any existing permittee regulatory mechanism(s) for pet waste.

**16.7** The permittee must develop and implement an education and outreach plan that consists of the following:

- a. target audience(s) (e.g., residents, businesses, commercial facilities, institutions, and local organizations; consideration should be given to low-income residents, people of color, and non-native English-speaking residents. A resource to help identify these areas is available on the Agency's environmental justice website);
- b. name or position title of responsible person(s) for overall plan implementation;
- c. specific activities and schedules to reach each target audience; and
- d. a description of any coordination with and/or use of stormwater education and outreach programs implemented by other entities, if applicable.

**16.8** The permittee must document the following information:

- a. a description of all specific stormwater-related issues identified by the permittee in item 16.3;
- b. all information required under the permittee's education and outreach plan in item 16.7;

- c. activities held, including dates, to reach each target audience;
- d. quantities and descriptions of educational materials distributed, including dates distributed; and
- e. estimated audience (e.g., number of participants, viewers, readers, listeners, etc.) for each completed education and outreach activity.

**16.9** The permittee must conduct an annual assessment of the public education program to evaluate program compliance, the status of achieving the measurable requirements in Section 16, and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., education and outreach efforts, implementation of written plans, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.



## Best Management Practices

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### 16.3 High Priority Stormwater Education Topics

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

**Required:** Yes

#### Description

**16.3** Distribute educational materials or equivalent outreach focused on at least two (2) specifically selected stormwater-related issues of high priority (e.g., specific TMDL reduction targets, changing local business practices, promoting adoption of residential BMPs, lake improvements through lake associations, household chemicals, yard waste, etc.). The topics must be different from those described in items 16.4 through 16.6. (IDDE, deicing salt use, pet waste)

#### Goals

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##### 16.3.1 Priority Topic #1

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

#### Description

For one of the high priority stormwater-related issues identified in the SWPPP, distribute educational materials or complete an equivalent outreach effort during the permit term.

Document the effort by describing the activity(ies) completed including at least the following information:

1. Description of target audience
2. Description of the high priority stormwater-related issue
3. Nature of the activity or outreach effort
4. Date(s) of the activity or effort
5. Quantities and descriptions of educational materials distributed
6. Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.)
7. Upload a copy of the educational materials delivered through this activity for future reference

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

Activity Date	Name	Description
12/31/2021	2021 Yard Waste	<ol style="list-style-type: none"><li>1. The City of Detroit Lakes focuses on the homeowners and landowners throughout the City of Detroit Lakes.</li><li>2. The main focus is yard waste such as fall leaves and proper lawn care.</li><li>3. The City of Detroit Lakes distributes the information in a variety of ways: Facebook, City's website, flyers in City facilities, and on the television located in the City Administration building.</li><li>4. The City of Detroit Lakes puts out the information on Facebook at two different times of the year. The information is posted on Facebook in the Spring and</li></ol>

Fall of the year. The information is also available throughout the year on the City's website under the MS4 page.

5. There are two different flyers that are utilized for yard waste which include a Lawn Care Tips and Fall Leaf Clean Up Tips. The City maintains two different Facebook accounts (City of Detroit Lakes and Detroit Lakes Public Utilities).

6. On the two Facebook pages, there are approximately 3,700 followers. This doesn't include the City of Detroit Lakes website which also has the information on the Storm Water (MS4) page. The flyers are also available throughout the year for residents to pick up and take with them.

7. Attached are the flyers that are available on Facebook, City's website, and at the City's facilities.

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12/31/2022

2022 Yard Waste

1. The City of Detroit Lakes focuses on the homeowners and landowners throughout the City of Detroit Lakes.

2. The main focus is yard waste such as fall leaves and proper lawn care.

3. The City of Detroit Lakes distributes the information in a variety of ways: Facebook, City's website, flyers in City facilities, and on the television located in the City Administration building.

4. The City of Detroit Lakes puts out the information on Facebook at two different times of the year. The information is posted on Facebook in the Spring and Fall of the year. The information is also available throughout the year on the City's website under the MS4 page.

5. There are two different flyers that are utilized for yard waste which include a Lawn Care Tips and Fall Leaf Clean Up Tips. The City maintains two different Facebook accounts (City of Detroit Lakes and Detroit Lakes Public Utilities).

6. On the two Facebook pages, there are approximately 3,700 followers. This doesn't include the City of Detroit Lakes website which also has the information on the Storm Water (MS4) page. The flyers are also available throughout the year for residents to pick up and take with them.

7. Attached are the flyers that are available on Facebook, City's website, and at the City's facilities.

Activity dates:

Give your Lawn a Little TLC: 5-12-22 (City website)  
PW Newsletter May: 5-1-22 (City website, Facebook)  
PW Newsletter August: 8-1-22 (City website, Facebook, email)

Yard Care Fall: 8-1-22 (City website, Facebook 8-10-22))  
 Min Fertilizer: 5-2-22 (Facebook)  
 Pet waste and yard care (Utility bill insert June 2022)  
 Yard Care Fall: 11-1-22 (City website, Facebook, email)

**16.3.2 Priority Topic #2**

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

**Description**

For one of the high priority stormwater-related issues identified in the SWPPP, distribute educational materials or complete an equivalent outreach effort during the permit term.

Document the effort by describing the activity(ies) completed including at least the following information:

1. Description of target audience
2. Description of the high priority stormwater-related issue
3. Nature of the activity or outreach effort
4. Date(s) of the activity or effort
5. Quantities and descriptions of educational materials distributed
6. Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.)
7. Upload a copy of the educational materials delivered through this activity for future reference

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

Activity Date	Name	Description
12/31/2021	2021 Pet Waste	<ol style="list-style-type: none"> <li>1. The City of Detroit Lakes focuses on the pet owners throughout the City of Detroit Lakes.</li> <li>2. The main focus is pet waste such as proper disposal.</li> <li>3. The City of Detroit Lakes distributes the information in a variety of ways: Facebook, City's website, flyers in City facilities, and letters sent to pet owners who are out of compliance.</li> <li>4. The City of Detroit Lakes puts out the information on Facebook at different times throughout the year. The information is also available throughout the year on the City's website.</li> <li>5. There is one flyer that is utilized for pet waste.</li> <li>6. On the two Facebook pages, there are approximately 3,700 followers. This doesn't include the City of Detroit Lakes website which also has the information on the Storm Water (MS4) page. The flyers are also available throughout the year for residents to pick up and take with them.</li> </ol>

7. Attached are the flyers that are available on Facebook, City's website, and at the City's facilities.

1. The City of Detroit Lakes target audience are residents and property owners. The City took part in the Water Festival which is a combined effort with multiple agencies to provide information on clean water. The information is presented to the entire fourth grade attending Detroit Lakes Public Schools. The City has also added information to the website and newsletter.
2. The focus will be on information on how to create rain gardens.
3. The City will be putting information on the MS4 webpage and on Facebook. Information was passed out and presented during the Water Festival which took place on May 6, 2022.
4. The Water Festival took place on Friday, May 6, 2022. Sally Hausken, City of Detroit Lakes, presented information on water gardens. The City sent out a newsletter with information on raingardens.
5. Materials that were handed out went to the entire fourth classes.
6. There are approximately 3,700 followers on the two Facebook pages that the City maintains. There are approximately 200 fourth grade students. Unknown the number of individuals who have visited the MS4 website.
7. Attached is the information that was handout out or entered on Facebook and the City's website.

Activity Dates:

- 5/10/2022 (Rain Garden - How To: City's Website)
- 5/19/2022 (Rain Gardens - City's Website)
- 5/26/2022 (Facebook Stormwater - Install Rain Garden)
- 6/5/2022 (Facebook Rain Garden)
- 6/6/2022 (Newsletter - Rain Garden)
- 6/27/2022 (Facebook - Rain Garden)
- 7/5/2022 (Facebook - Shoreland Buffer)

## 16.4 IDDE Recognition and Reporting

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

**Required:** Yes

### Description

**16.4** At least once each calendar year, distribute educational materials or equivalent outreach focused on illicit discharge recognition and reporting illicit discharges to the permittee.

### Goals

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#### 16.4.1 IDDE Recognition and Reporting Outreach

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

### Description

Distribute educational materials or complete an equivalent outreach effort at least once each year focused on providing training and education on illicit discharge recognition and requirements and procedures for reporting illicit discharges.

Provide the following information to document each annual (at least) outreach effort:

1. Description of target audience
2. Nature of the activity or outreach effort
3. Date(s) of the activity or effort
4. Quantities and descriptions of educational materials distributed
5. Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.)
6. Upload a copy of the IDDE educational materials delivered through this activity for future reference

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/30/2021	2021 IDDE Recognition & Reporting	<p>Distribute educational materials or complete an equivalent outreach effort at least once each year focused on providing training and education on illicit discharge recognition and requirements and procedures for reporting illicit discharges.</p> <ol style="list-style-type: none"><li>1. The City of Detroit Lakes focuses on the homeowners and landowners throughout the City of Detroit Lakes.</li><li>2. The nature of the outreach efforts is to educate and inform. The City of Detroit Lakes distributes the information in a variety of ways: Facebook, City's website, flyers in City facilities, and on the television located in the City Administration building.</li><li>3. The City of Detroit Lakes puts out the information on Facebook at various times of the year. The</li></ol>

information is also available throughout the year on the City's website under the MS4 page.

- 2021 Spring Lawn Care tips
- 2021 Spring Lawn Care tips Facebook post 5-25-21
- 2021 Water Saving lawn tip Facebook post 6-4-21
- 2021 Small Residential Construction site pollution prevention Facebook post 8-25-21
- 2021 Fall Yard care tips Facebook post 9-21-21
- 2021 Fall Yard care tips website flyer

5. On the two Facebook pages, there is approximately 3,700 followers. This doesn't include the City of Detroit Lakes website which also has the information on the Storm Water (MS4) page. The flyers are also available throughout the year for residents to pick up and take with them.

6. Attached are the flyers and screenshots that are available on Facebook, City website and at the City's facilities.

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12/31/2022

2022 IDDE Recognition & Reporting

Distribute educational materials or complete an equivalent outreach effort at least once each year focused on providing training and education on illicit discharge recognition and requirements and procedures for reporting illicit discharges.

Provide the following information to document each annual (at least) outreach effort:

1. The City of Detroit Lakes focuses on the homeowners and landowners throughout the City of Detroit Lakes.

2. The nature of the outreach efforts is to educate and inform. The City of Detroit Lakes distributes the information in a variety of ways: Facebook, City's website, flyers in City facilities, and on the television located in the City Administration building.

3. The City of Detroit Lakes puts out the information on Facebook at various times of the year. The information is also available throughout the year on the City's website under the MS4 page.

Give Your Lawn a Little TLC: 5-12-22 (Facebook & website)

Hazardous Waste: 5-9-22 (Facebook)

Inspect Septic: 5-23-22 (Facebook)

Lawn TLC: 5-13-22 (Facebook)

Min Fertilizer: 5-2-22 (Facebook)

Reduce Hard Surfaces: 5-30-22 (Facebook)

Fall Yard Care: (8-1-22 Website) & (Facebook 8-10-22)

Yard Waste Door Hanger: Hung as violations occur  
Pet waste & Yard Care (Utility bill insert June 2022)

4. Newsletters are available for print for the City website. They are also distributed through email. The City maintains two different Facebook

accounts (City of Detroit Lakes and Detroit Lakes Public Utilities).

5. On the two Facebook pages, there is approximately 3,700 followers. This doesn't include the City of Detroit Lakes website which also has the information on the Storm Water (MS4) page. The flyers are also available throughout the year for residents to pick up and take with them.

6. Attached are the flyers, screenshots and newsletters that are available on Facebook, City website and at the City's facilities.

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## 16.5 Salt Usage and Impact

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

**Required:** Yes

### Description

**16.5** For cities and townships, at least once each calendar year, the permittee must distribute educational materials or equivalent outreach to residents, businesses, commercial facilities, and institutions, focused on the following:

- a. impacts of deicing salt use on receiving waters;
- b. methods to reduce deicing salt use; and
- c. proper storage of salt or other deicing materials.

### Goals

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#### 16.5.1 Deicing Salt Education Outreach

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

### Description

Distribute educational materials or equivalent outreach annually to residents, businesses, commercial facilities, and institutions, focused on the following:

- a. impacts of deicing salt use on receiving waters;
- b. methods to reduce deicing salt use; and
- c. proper storage of salt or other deicing materials.

Provide the following information to document each annual (at least) outreach effort:

1. Description of target audience
2. Primary focus of educational effort (salt impact, reduction, and/ or storage)
3. Nature of the activity or outreach effort
4. Date(s) of the activity or effort
5. Quantities and descriptions of educational materials distributed
6. Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.)
7. Upload a copy of the deicing salt management educational materials delivered through this activity for future reference

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/31/2021	2021-2022 PU Reduce Salt use Flyer	Distribute educational materials or equivalent outreach annually to residents, businesses, commercial facilities, and institutions.  This is a handout that is kept at our Administrative Building. It is available for anyone to take. The primary focus is salt use reduction. This flyer is kept out year round. It is unknown the exact quantity that is taken but thousands of people pass through this building each year.  Attached is a copy of the flyer

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02/25/2022

2022 Salt Wise Snow Removal

Tips on how to practice salt wise snow removal were placed on both The City of Detroit Lakes Facebook page and the Detroit Lakes Public Utilities Facebook page. The target audience are the residents in the City of Detroit Lakes. Primary focus is salt education and how salt affects aquatic life. The number of followers for The Public Utilities Facebook page is 982 people and the City of Detroit Lakes has 2,668 followers.

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## 16.6 Pet Waste Management and Impact

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

**Required:** Yes

### Description

**16.6** For cities and townships, at least once each calendar year, the permittee must distribute educational materials or equivalent outreach focused on pet waste. The educational materials or equivalent outreach must include information on the following:

- a. impacts of pet waste on receiving waters;
- b. proper management of pet waste; and
- c. any existing permittee regulatory mechanism(s) for pet waste.

[Minn. R. 7090]

### Goals

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#### 16.6.1 Pet Waste Management

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

### Description

Distribute educational materials or equivalent outreach annually focused on pet waste. The educational materials or equivalent outreach must include information on the following:

- a. impacts of pet waste on receiving waters;
- b. proper management of pet waste; and
- c. any existing permittee regulatory mechanism(s) for pet waste.

Provide the following information to document each annual (at least) outreach effort:

1. Description of target audience
2. Primary focus of educational effort (pet waste impact, proper waste management, and/ or existing regulatory mechanisms)
3. Nature of the activity or outreach effort
4. Date(s) of the activity or effort
5. Quantities and descriptions of educational materials distributed
6. Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.)
7. Upload a copy of the pet waste management educational materials delivered through this activity for future reference

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
06/28/2021	2021 Pet Waste Management	<ol style="list-style-type: none"><li>1. The City of Detroit Lakes focuses on the pet owners throughout the City of Detroit Lakes.</li><li>2. The primary focus of this particular impact is proper waste management.</li><li>3. The City of Detroit Lakes distributes information in a variety of ways including Facebook, the City's webpage, flyers and letters sent to pet owners who may be out of compliance.</li><li>4. The particular attached information was shared on Facebook June 28, 2021.</li><li>5. The particular attached information was shared on</li></ol>

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Facebook prior to the City's July 4th activities.  
6. The City's Facebook page has approximately 3,700 followers.

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12/31/2022

2022 Pet Waste Management

1. Description of target audience. The City of Detroit Lakes focuses on pet owners throughout the City of Detroit Lakes.

2. Primary focus of educational effort (pet waste impact, proper waste management, and/ or existing regulatory mechanisms). The primary focus is proper waste management.

3. Nature of the activity or outreach effort. The City of Detroit Lakes distributes information in a variety of ways including Facebook, the City's webpage, flyers and letters sent to pet owners who may be out of compliance.

4. Date(s) of the activity or effort. The City of Detroit Lakes puts out the information on Facebook at various times of the year. The information is also available throughout the year on the City's website under the MS4 page.

5. Quantities and descriptions of educational materials distributed. Newsletters are available for print for the City website. They are also distributed through email. The City maintains two different Facebook accounts (City of Detroit Lakes and Detroit Lakes Public Utilities).

6. Estimated audience (e.g., number of participants, viewers, readers, listeners, etc.). On the two Facebook pages, there is approximately 3,700 followers. This doesn't include the City of Detroit Lakes website which also has the information on the Storm Water (MS4) page. The flyers are also available throughout the year for residents to pick up and take with them.

7. Upload a copy of the pet waste management educational materials delivered through this activity for future reference.

Activity Dates:

Animal Control 2022: Flyers available in City Building and on website. Facebook 8-18-22

Be a good Pet owner: sent to apartment complex 3-22-22. Facebook 8.12.22

Pet waste utility bill insert - June 2022

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## 16.7 Educational and Outreach Plan

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

**Required:** Yes

### Description

**16.7** The permittee must develop and implement an education and outreach plan that consists of the following:

- a. target audience(s) (e.g., residents, businesses, commercial facilities, institutions, and local organizations; consideration should be given to low-income residents, people of color, and non-native English-speaking residents. A resource to help identify these areas is available on the Agency's environmental justice website);
- b. name or position title of responsible person(s) for overall plan implementation;
- c. specific activities and schedules to reach each target audience; and
- d. a description of any coordination with and/or use of stormwater education and outreach programs implemented by other entities, if applicable.

### Goals

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#### 16.7.1 Educational and Outreach Plan

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

### Description

Develop an education and outreach plan that consists of:

- a. Target audience(s)
- b. Name or position title of responsible person(s) for overall plan implementation
- c. Specific activities and schedules to reach each target audience
- d. A description of any coordination with and/or us of stormwater education and outreach programs implemented by other entities, where applicable.

Provide a copy or link to the current Education and Outreach Plan and describe any updates or changes completed in the reporting period. *(OR report individual components separately with measurable goals 2-5.)*

**Planned:** 2021

**Complete:** 2021

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
08/27/2021	2021 Educational and Outreach Plan	Attached is the 2021 Education and Outreach Plan stated in the target audience, topic areas/issues of concern, responding to public comments, along with timeline, methods, and responsibilities.  The Education and Outreach Plan is located on the City of Detroit Lakes website on the MS4/Stormwater page.
07/17/2023	2022 & 2023 Educational and Outreach Plan	Attached is the 2022 and Education and Outreach Plan stated in the target audience, topic areas/issues of concern, responding to public comments, along with timeline, methods, and responsibilities.  The Education and Outreach Plan is located on the City of Detroit Lakes website on the MS4/Stormwater page.

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Dates:

March 31, 2023

July 17, 2023

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### 16.7.2 Identify Target Audiences and Topics

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

#### Description

Identify specific target audiences and respective topics 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 issue(s) for each target audience
3. Identify measurable goals for education and outreach efforts for each target audience

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

Activity Date	Name	Description
08/27/2021	2021 - 2023 Target Audience and Topics	<p><b>Target Audience</b> Educational needs are dependent on the target audience. Each target audience plays a different role in the protection, preservation and management of water resources. Thus, programs and tools are tailored to different target audiences. This plan lays out the priority area education programs and tools according to the target audiences listed below.</p> <ul style="list-style-type: none"><li>• Local Officials &amp; Decision makers: appointed/elected officials such as city councils and planning commissions.</li><li>• Staff: planners, engineers, and public works staff.</li><li>• Homeowners/Landowners: citizens and students</li></ul> <p><b>Topic Areas/Issues of Concern</b></p> <ul style="list-style-type: none"><li>• For citizens we want to increase awareness of protecting and improving the water quality of our lakes, streams and wetlands in the watershed through the proper handling of yard waste and the benefits of rain gardens.</li><li>• For public works staff we want to increase awareness on illicit discharges, illicit discharge detection and municipal operations best management practices (BMPs) concerning ice control operations with chloride.</li><li>• For students and families we want to increase awareness through fun facts and information that encourages the adoption of wonderful environmental values and positive lifelong stewardship roles (Water</li></ul>

Festival).

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### 16.7.3 Responsible Person in Charge

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

#### Description

Identify the person in charge of overall plan implementation.

Confirm or update identification of the person in charge of the MS4s overall plan implementation each reporting period.

Activity Date	Name	Description
12/31/2021	2021 - 2023 Public Education and Outreach Responsible Person	The City Administrator, Kelcey Klemm, is responsible for implementing and/or coordinating the City of Detroit Lakes Public Education and Outreach Program activities in 2021.
03/29/2022	2022 Public Education and Outreach Responsible Person	The City Administrator, Kelcey Klemm, is responsible for implementing and/or coordinating the City of Detroit Lakes Public Education and Outreach Program activities in 2022.

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### 16.7.4 Education/ Outreach Activities

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

#### Description

Provide a list of specific activities and schedules to reach each target audience with their respective stormwater education topic(s). Describe the topic(s), activity type, and supporting educational materials and activity or outreach effort schedule.

Activity Date	Name	Description
12/31/2023	2022 & 2023 Education/Outreach Activities	Many of the education / outreach activities listed in 16.8 apply directly to our target audience.

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### 16.7.5 Collaboration for Stormwater Education and Outreach

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

#### Description

Describe any coordination with and/or use of stormwater education and outreach programs implemented by other entities, where applicable. Include the name of the collaborating entity(ies), the educational topics covered in the collaborative program, types and dates of educational activities and outreach efforts, audience descriptions and the estimated number of participants reached for each activity or effort.

Activity Date	Name	Description
04/29/2022	2022 Water Festival	The City of Detroit Lakes along with the following agencies: Becker County Public Health, MN Rural Water/MN Department of Health, Becker County Soil and Water, Becker County Environmental Services, Pelican River Watershed District, MN Pollution Control Agency, Becker County Museum, Essentia Health, and the MN Department of Natural Resources hosted the 2022 Water Festival.  The Water Festival is given to the fourth grade elementary students located in the Detroit Lakes

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Public Schools. There were approximately 170 students at the Water Festival.

Students were given information to encourage them to adopt environmental values and positive lifelong stewardship roles.

List of presenters for Lakes Country Water Festival:

1. City of DL Public Works – Storm Water Jetter Truck, Street Sweeper, MS4, Tree Planting Arbor Day
2. Becker County Public Health – Effects of fluoride in city water for oral health
3. MN Rural Water Association/MN Dept of Health – Groundwater model, aquifers, how water moves in different soil types and potential contaminates that can end up in groundwater
4. Becker County Soil and Water – helping students understand the concept of invasive species and how they affect our lakes and rivers.
5. Becker County Environmental Services – management of waste through composting
6. Pelican River Watershed District – what a watershed is, demonstrate the watershed model
7. MN Pollution Control Agency – water quality jeopardy
8. Becker County Museum – water hydraulics interactive activity and trivia
9. Sally Hausken City of DL - raingardens
10. Garrett Penton Essentia Health – Water and your health, water in the human body, hydration/beverage, role of healthy drinking water, osmosis
11. MN Department of Natural Resources – present a stream table to show water movement, talk about meander, channel, soil and bank erosion, floodplains, show how rivers form and change over geologic time.

Attached is the schedule of presentations.

12/31/2022	2022 PRWD Education Outreach	Pelican River Watershed District annually provides educational presentations throughout the community.
12/31/2023	2021 - 2023 Household Hazardous Waste	<p>The City of Detroit Lakes hand out materials to residents regarding household hazardous waste materials which can be dropped off at the Becker County site located 3 miles north of Detroit Lakes on Highway 59.</p> <p>Items that are acceptable include: paints, stains, varnishes, solvents, garden pesticides, flammable products, poisons, adhesives, aerosol cans, lawn care products, cleaners, automotive chemicals.</p> <p>There are two flyers available regarding the serves in the front office at the City Administration Building.</p> <p>Becker County sends out a recycling flyer with all property tax statements.</p>

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## 16.8 Public Education and Outreach Activities

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

**Required:** Yes

### Description

16.8 The permittee must document the following information:

- a. a description of all specific stormwater-related issues identified by the permittee in item 16.3;
- b. all information required under the permittee's education and outreach plan in item 16.7;
- c. activities held, including dates, to reach each target audience;
- d. quantities and descriptions of educational materials distributed, including dates distributed; and
- e. estimated audience (e.g., number of participants, viewers, readers, listeners, etc.) for each completed education and outreach activity. [Minn. R. 7090]

### Goals

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#### 16.8.2 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.

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.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2021	2021 Stormwater Webpage	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](mailto: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 is located at: <https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055>

The Public Utilities website had approximately 100 visits.

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12/31/2021	2021 Sanitary Sewer Maintenance	<p>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 <a href="mailto:dpublicworks@cityofdetroitlakes.com">dpublicworks@cityofdetroitlakes.com</a> from 7:00 a.m.-3:30p.m. or after hours at (218) 847-5658. City of Detroit Lakes Sanitary Sewer Maintenance Policy</p> <p>The City's webpage is located: <a href="https://cityofdetroitlakes.com/index.asp?SEC=4E39A8A8-B770-4D99-9270-27647905943A">https://cityofdetroitlakes.com/index.asp?SEC=4E39A8A8-B770-4D99-9270-27647905943A</a></p> <p>The Public Utilities website had approximately 100 visits.</p>
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12/31/2022	2022 Stormwater Webpage	<p>Storm Water (MS4)</p> <p>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</p>
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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](mailto:dpublicworks@cityofdetroitlakes.com) or 218-847-4637.

Website Location:

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

Items that have been added to the website include: Hazardous Waste Information, Recycling Information, Education and Outreach Plan, Green Building, Rain Gardens - How to, Rain Gardens, Fight Snow and Ice Pollution Free, Reducing Waste at Home, A fresh view of the lake, Stormwater, Water Pollution Prevention Program, 2018 Annual Report, 2018 SWPPP, 2019 Annual Report, 2019 SWPPP, 2020 Annual Report, and 2020 SWPPP

Additional Information Added: 5/26/2022

The Public Utilities website had approximately 100 visits.

**16.8.3 Distribute Educational Materials at Public Facilities**

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

**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.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

Activity Date	Name	Description
05/25/2021	2021 Lawn Care Tips	Tips for your Lawn Care and keeping pollutants out has been placed on the City website, TV announcements in City Administration buildings, and City Administration lobby.
05/25/2021	2021 Yard Waste	<ol style="list-style-type: none"> <li>1. The City of Detroit Lakes focuses their attention on the yard waste. The target audience is homeowners and landowners.</li> <li>2. The high priority is grass clippings and yard waste and how to prevent pollutants such as phosphorus</li> </ol>

and other chemicals from getting into lakes and streams.

3. In an effort to improve yard waste, the City puts out notices on Facebook, City's website, television in City Administration building, and throughout City facilities. There are flyers available in the offices for residents to take with them.

4. The dates include Spring through fall. Fall Yard Care tips was put on Facebook on September 21, 2021. The Spring lawn care tips was entered onto Facebook on May 25, 2021.

5. Residents receive the information on the website, Facebook, and in paper format. There are two different publications which include Lawn Care Tips and Fall Leaf Clean Up Tips.

6. The City of Detroit Lakes has two different Facebook pages and has approximately 3,700 followers.

7. Attached are the two flyers that are handed out in the City office and on the website.

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09/21/2021	2021 Fall Yard Tips	A Fall Yard Tips sheet was added to the City's Facebook page on September 21, 2021. The Fall Yard Tips sheet included information related to the City Ordinance 901.04 and the issues leaves created by adding phosphate to the lakes.
12/31/2021	2021 Stormwater Pollution Prevention Information Brochure provided to residents who are on Small Residential Construction	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.  Can be found the City's website at: <a href="https://cityofdetroitlakes.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uploads/Small_Residential_Construction.pdf">https://cityofdetroitlakes.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uploads/Small_Residential_Construction.pdf</a>  Entered on Facebook on August 25, 2021 - See attachment below  The plan was handed with approximately 200 building and zoning permits.  There is approximately 100 views on the City's website and approximately 3,500 followers to the
12/31/2021	2021 Educational Materials	Attached is a list of materials that have been handed out, published or displayed. Materials are available in the City Administration Office, Facebook pages, City's webpage, etc.

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05/12/2022	2022 Lawn TLC	A Spring Yard Care Tips sheet was added to the City's Facebook page on May 12, 2022. The spring tips sheet gives information on tips on keeping a healthy lawn and information on pollutants.
12/31/2022	2022 Fall Yard Tips	A Fall Yard Tips sheet was added to the City's Website on August 11, 2022 and the Facebook page on August 18, 2022. The Fall Yard Tips sheet included information related to the City Ordinance 901.04 and the issues leaves created by adding phosphate to the lakes.
12/31/2022	2022 Stormwater Pollution Prevention on Small Residential Construction	<p>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.</p> <p>Can be found the City's website at: <a href="https://cityofdetroitlakes.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uploads/Small_Residential_Construction.pdf">https://cityofdetroitlakes.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uploads/Small_Residential_Construction.pdf</a></p> <p>The plan was handed out with approximately 200 building and zoning permits.</p> <p>There is approximately 100 views on the City's website and approximately 3,500 followers to the Facebook page.</p>

#### 16.8.4 Distribute Educational Materials at Community Events

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

#### Description

Distribute educational materials at community events or activities within the MS4.

Identify the community event, target audience and respective topic(s), date(s) of activity, copy or description and quantity of distributed material for each event through the reporting period.

Activity Date	Name	Description
05/19/2021	2021 E2Q Open House	The City of Detroit Lakes hosted an open house of the stormwater treatment plant. There was an estimated 150 people who attended the event. During which a Public Utilities employee handout brochures relative to Wellhead Protection, Water Conservation, and Reduce Salt Use.
08/26/2021	2021 Women's Expo	The City of Detroit Lakes took part in the Women's Expo. A Public Utilities employee handed out brochures and discussed with attendees the following brochures: Wellhead Protection, Water Conservation, and Reduce Salt Use. The event was attended by an estimated 150 people.

### 16.8.5 Newsletter Articles

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

#### Description

Provide seasonally relevant stormwater education information in newsletter format for periodic publication.

Identify the target audience and respective topic; provide a copy of each article published in the MS4's newsletter or other printed publication, including the date of publication and general distribution.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
09/01/2021	2021 Public Utilities Newsletter	<p>The Detroit Lakes Public Utilities produced a newsletter in September 2021. As part of the newsletter, an article was done relative to reducing chloride levels. The article discussed the dangers to rivers, lakes and streams from salt in water softener systems.</p> <p>The newsletter goes out to the City of Detroit Lakes along with residents outside of the City that utilize Public Utilities.</p> <p>Target audience is all Public Utilities users.</p> <p>Attached is the newsletter that was sent out in September of 2021.</p> <p>The newsletter went out to approximately 5,800 households.</p>
05/01/2022	2022 Public Works Newsletters	<p>The Detroit Lakes Public Works department started to produce a monthly newsletter in May 2022. As part of these newsletters, articles are done in regards to MS4 related topics. The articles discussed the dangers to rivers, lakes and streams from stormwater pollutants.</p> <p>The newsletters are posted on our website, our Facebook page and are starting to gain momentum in an email distribution.</p> <p>Target audience is the general public.</p> <p>Attached are the newsletters from 2022.</p> <p>Each newsletter went out to approximately 1,500 households.</p>

### 16.8.6 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.

Identify the target audience(s) and respective topic(s); provide a copy of the PSA text, the approximate number of times aired and a general time frame for broadcast of each PSA message each reporting period to document activity in support of this goal.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

Activity Date	Name	Description
05/24/2022	2022 & 2023 Minimize Fertilizer Use	<p>The City of Detroit Lakes posted on Facebook a way to be a better steward of our lakes.</p> <p>The first of ten is how to Minimize Fertilizer Use.</p> <p>The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was put out once on the City of Detroit Lakes Facebook page.</p> <p>Message: Remember it is phosphorus that accelerates algae growth in our lakes and rivers. Most lawns already contain adequate amounts of phosphorous. When purchasing fertilizer, be sure the middle number on the bag is 0. It is illegal to use fertilizer with phosphorous in Minnesota. Curb Pollutants at their source-fertilizers, household toxins, eroding soils, malfunctioning septic systems.</p> <p><a href="https://www.facebook.com/photo/?fbid=358558542972630&amp;set=a.220155100146309">https://www.facebook.com/photo/?fbid=358558542972630&amp;set=a.220155100146309</a></p> <p>City of Detroit Lakes Facebook page has approximately 3,000 followers.</p> <p>Dates: May 2, 2022 May 24, 2023</p>
05/26/2022	2022 Stormwater	<p>The City of Detroit Lakes posted on Facebook information regarding Stormwater. The information was relative to "What is it? Why is it important?". It addressed issues on how to reduce pollutants in stormwater runoff along with information on rain garden and rain barrels.</p> <p>The intended audience is property owners and residents of the City of Detroit Lakes.</p> <p>The post was entered onto the City of Detroit Lakes Facebook page and the City of Detroit Lakes website on May 26, 2022.</p> <p><a href="https://www.facebook.com/photo/?fbid=374900511338433&amp;set=a.220155100146309">https://www.facebook.com/photo/?fbid=374900511338433&amp;set=a.220155100146309</a></p> <p>City of Detroit Lakes Facebook page has approximately 3,000 followers.</p>

07/05/2022

2022 Create a Shoreland Buffer

The City of Detroit Lakes posted on Facebook another way to be a better steward of your lakes.

The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was entered once on the City of Detroit Lakes Facebook page.

The ten topic is create a shoreland buffer.

Message: Before you begin creating a shoreland buffer, re-think what your shoreland should look like. Consider the characteristics on your property and determine what you want to accomplish. Buffers are helpful in all of the following:

- Slows and filters runoff. Buffers slow runoff and allow rain to soak into the ground.
- Stabilizes shoreline. Buffers prevent fluctuating water levels, moving ice, flooding, surface runoff, and wave action from eroding your shoreline.
- Provides habitat. The water's edge provides food and cover for birds, butterflies, turtles, and other wildlife.
- Enhances aesthetics. Natural buffers beautify your yard with a variety of colorful wildflowers that bloom throughout the season.
- Increases property value. A well done buffer is an asset that adds value.
- Limits nuisance wildlife. A plant buffer creates a natural barrier to Canada geese.

<https://www.facebook.com/photo/?fbid=400857215409429&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

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05/26/2023

2022 Household Hazardous Waste PSA

The City of Detroit Lakes posted on Facebook another way to be a better steward of our lakes.

The second topic is how to dispose of household hazardous waste properly. The City of Detroit Lakes partners with Becker County in removal of household hazardous waste materials.

The household hazardous waste site is located 3 miles north of Detroit Lakes on Highway 59.

Acceptable Items:

- Paints
  - Stains
  - Varnishes
  - Solvents
  - Garden pesticides
  - Flammable products
  - Poisons
  - Adhesives
-



- Aerosol cans
- Lawn care products
- Cleaners
- Automotive chemicals

The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was placed on the City of Detroit Lakes Facebook pages once.

Message: Dispose of Household Hazardous Waste properly:

Gasoline, oil, solvents, old paints, thinners, fertilizers, pesticides, cleaners and many other products need to be disposed of properly. Becker County web page outlining the do's and don'ts of hazardous disposal in our area.

Link: [https://www.co.becker.mn.us/dept/environmental\\_services/hhw.aspx](https://www.co.becker.mn.us/dept/environmental_services/hhw.aspx)

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Dates: May 9, 2023  
May 31, 2023

06/07/2023	2022 & 2023 Minimize Erosion	<p>The City of Detroit Lakes posted on Facebook how to minimize erosion.</p> <p>The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was put out one time on the City of Detroit Lakes Facebook page.</p> <p>Message: Although erosion occurs naturally human activities may significantly increase the rate of erosion. Removing natural vegetation, increasing wave action from watercrafts or construction near the shoreline will all increase the rate of erosion. Before taking action to correct erosion, determine why the erosion is occurring. Without understanding the problem, your actions may be a waste of time and money. Along with a list of erosion indicators.</p> <p><a href="https://www.facebook.com/photo/?fbid=368142922014192&amp;set=a.220155100146309">https://www.facebook.com/photo/?fbid=368142922014192&amp;set=a.220155100146309</a></p> <p>City of Detroit Lakes Facebook page has approximately 3,000 followers.</p> <p>Dates:</p> <p>May 16, 2023 June 7, 2023</p>
06/14/2023	2022 & 2023 Inspect & Maintain Your Septic System	<p>The City of Detroit Lakes posted on Facebook another way to be a better steward of your lakes.</p> <p>The four topics are how to Inspect &amp; Maintain Your</p>

Septic System.

The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was entered once on the City of Detroit Lakes Facebook page.

Message: The more water and material that go into your septic system, the more that comes out into your drain field. If nutrients seep underground into the lake, aquatic plant growth and algae blooms are likely to result. It is important for your family's health and the lake's health to be sure your septic is properly maintained. Conserve water -- use low flow toilets, faucets, and showerheads to reduce water volume.

<https://www.facebook.com/photo/?fbid=372704624891355&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Dates:

May 23, 2022  
June 14, 2023

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06/21/2023                      2022 & 2023 Reduce Hard Surfaces      The City of Detroit Lakes posted on Facebook how tips on reducing hard surfaces.

The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was put out one time on the City of Detroit Lakes Facebook page.

Message: Rainwater that doesn't soak into the ground but instead runs off hard surfaces (impervious) or washes off lawns and steep slopes is called runoff. This runoff carries nutrients, sediments, toxic materials, bacteria and other pollutants that can reduce water clarity, increase aquatic plants and algae, and impact fish and wildlife habitat.

<https://www.facebook.com/photo/?fbid=377442344417583&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Dates:

May 30, 2022  
June 21, 2023

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06/28/2023

2022 & 2023 Learn from Mother Nature Plant Trees and Shrubs

The City of Detroit Lakes posted on Facebook another way to be a better steward of your lakes.

The sixth topic is learning from Mother Nature plant trees and shrubs.

The intended audience is residents both seasonal and year-round of the City of Detroit Lakes. The post was entered once on the City of Detroit Lakes Facebook page.

Message:

Natural vegetation will reduce runoff by holding back the water to provide time for it to soak into the ground.

- Minimize removal of wooded areas. Their removal causes more rain to fall to the ground instead of landing on trees and branches.
- Grading large areas of land removes the natural depressions where water can pond and soak in.
- Carefully landscape your yard, especially along the shoreline, to direct runoff away from the lake. Leave the suburban lawn mentality in the city.

- Keeping the lawn natural will reduce maintenance and increase its ability to absorb runoff.
- Consider replacing some of the grass in your lawn with native grasses that don't need watering.
- If watering is needed, water deeply to encourage deep root growth. Water with lake water, using the nutrients in the lake to make a healthy lawn instead of applying fertilizer.

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Dates:

June 6, 2023  
June 28, 2023

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07/05/2023

2022 & 2023 Direct Downspouts

The City of Detroit Lakes posted on Facebook tips on where to direct downspouts.

The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was entered once on the City of Detroit Lakes Facebook page.

Message:

#7: Direct downspouts onto your lawn or landscaping, not onto hard surfaces

This will allow the water from your rooftops a chance to be absorbed and filtered before flowing into the

lake or street.

<https://www.facebook.com/photo/?fbid=386448553516962&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Dates:

June 13, 2022

July 5, 2023

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07/12/2023

2022 & 2023 Install a Rain Barrel

The City of Detroit Lakes posted on Facebook another way to be a better steward of your lakes.

The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was entered once on the City of Detroit Lakes Facebook page.

The eight topic is install a rain barrel.

Message: Rain barrels are fun as well as functional. Collect water from your rooftop to water your yard and gardens during dry periods. The barrel should be covered to keep out leaves and insects.

<https://www.facebook.com/photo/?fbid=391019546393196&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Activity Dates:

June 20, 2022

July 12, 2023

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07/17/2023

2022 & 2023 Stormwater Pollution Prevention on Small Residential Construction

The City of Detroit Lakes posted on the Stormwater Pollution Prevention on Small Residential Construction.

The intended audience is contractors and property owners in the City of Detroit Lakes.

The post was entered on the City of Detroit Lakes Facebook page on May 19, 2022. There are 10 important steps to Stormwater Pollution prevention on small residential construction sites.

<https://www.facebook.com/photo?fbid=370175921810892&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Dates:

May 19, 2023  
July 17, 2023

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07/17/2023            2023 Sweep Up! Rake Up! Pick Up!    Added information regarding keeping drains clean. Items that it included were: Dog poop; Leaves, Grass, and Dirt; Trash and Salt.

The Information was added to Facebook. <https://www.facebook.com/photo?fbid=676267701201711&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Date:

July 17, 2023

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07/19/2023            2022 & 2023 Build a Rain Garden    The City of Detroit Lakes posted on Facebook another way to be a better steward of your lakes.

The intended audience are residents both seasonal and year-round of the City of Detroit Lakes. The post was entered once on the City of Detroit Lakes Facebook page.

The nine topic is build a rain garden.

Message: Rain gardens are excellent habitat for butterflies and birds. Blue Thumb is a great source for helping you plan and plant a rain gardent at [www.bluethumb.org](http://www.bluethumb.org). It will guide you through the process including:

- Where is a good location in my yard for a rain garden?
- How big should it be?
- What plants would work well in this region of Minnesota?
- What maintenance is required after planting.

<https://www.facebook.com/photo?fbid=395637652598052&set=a.220155100146309>

City of Detroit Lakes Facebook page has approximately 3,000 followers.

Dates:

June 27, 2022  
July 19, 2023

### 16.8.7 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.

Document activity toward achieving this goal each reporting period with a description and date of the event, the target audience(s) and respective topic(s), a narrative summary of the information provided, an estimate of the number of public contacts made and identification or uploaded copy, including the quantity, of materials distributed.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	Same as 16.8.8	Community exhibits and education are listed in 16.8.8 and 16.7.5.

### 16.8.8 Stormwater Education Public Presentations

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

#### 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 the target audience(s) and respective topics(s) of each presentation conducted through the 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.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
04/29/2022	2022 Water Festival	<p>The City of Detroit Lakes along with the following agencies: Becker County Public Health, MN Rural Water/MN Department of Health, Becker County Soil and Water, Becker County Environmental Services, Pelican River Watershed District, MN Pollution Control Agency, Becker County Museum, Essentia Health, and the MN Department of Natural Resources hosted the 2022 Water Festival.</p> <p>The Water Festival is given to the fourth grade elementary students located in the Detroit Lakes Public Schools. There were approximately 170 students at the Water Festival.</p> <p>Students were given information to encourage them to adopt environmental values and positive lifelong stewardship roles.</p> <p>List of presenters for Lakes Country Water Festival:</p> <ol style="list-style-type: none"><li>1. City of DL Public Works – Storm Water Jetter Truck, Street Sweeper, MS4, Tree Planting Arbor Day</li><li>2. Becker County Public Health – Effects of fluoride in city water for oral health</li><li>3. MN Rural Water Association/MN Dept of Health – Groundwater model, aquifers, how water moves in different soil types and potential</li></ol>

- contaminates that can end up in groundwater
4. Becker County Soil and Water – helping students understand the concept of invasive species and how they affect our lakes and rivers.
  5. Becker County Environmental Services – management of waste through composting
  6. Pelican River Watershed District – what a watershed is, demonstrate the watershed model
  7. MN Pollution Control Agency – water quality jeopardy
  8. Becker County Museum – water hydraulics interactive activity and trivia
  9. Sally Hausken City of DL - raingardens
  10. Garrett Penton Essentia Health – Water and your health, water in the human body, hydration/beverage, role of healthy drinking water, osmosis
  11. MN Department of Natural Resources – present a stream table to show water movement, talk about meander, channel, soil and bank erosion, floodplains, show how rivers form and change over geologic time.
- Attached is the schedule of presentations.

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11/15/2022	2022 LRBA Lunch & Learn	<p>On November 15, 2022 the City presented frequently found violations of Sediment and Erosion Control and the importance of filing the subdivision registration form to separate out a lot from the parent permit for a common plan of development.</p> <p>Audience: 20 local contractors, developers, and building supply companies Link to presentation: <a href="https://www.canva.com/design/DAFR9Y2d-Hg/g9T2aswpGK1kfEddJTfBg/view?utm_content=DAFR9Y2d-Hg&amp;utm_campaign=designshare&amp;utm_medium=link2&amp;utm_source=sharebutton">https://www.canva.com/design/DAFR9Y2d-Hg/g9T2aswpGK1kfEddJTfBg/view?utm_content=DAFR9Y2d-Hg&amp;utm_campaign=designshare&amp;utm_medium=link2&amp;utm_source=sharebutton</a></p>
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## 16.9 Annual I & E Program Assessment

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

**Required:** Yes

### Description

**16.9** The permittee must conduct an annual assessment of the public education program to evaluate program compliance, the status of achieving the measurable requirements in Section 16 and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., education and outreach efforts, implementation of written plans, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

### Goals

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#### 16.9.1 Annual Education and Outreach Program Assessment

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

### Description

Conduct an annual assessment of the public education program to evaluate program compliance, the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each manual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

**Planned:** 2022 2023 2024 2025 2026

**Complete:**

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
03/29/2022	2021 - 2022 Education and Outreach Program Assessment	<p>The City of Detroit Lakes established a public education and outreach program on August 27, 2021. The City continued to review the educational plan throughout the 2021 year.</p> <p>City Administrator, Kelcey Klemm, and staff reviewed the Education Outreach Program on March 29, 2022.</p> <p>It was determined that the target audience; topic areas/issues of concern; responding to public comments; and timeline, methods, and responsibilities are still valid.</p> <p>Staff will continue to meet the education and outreach program guidelines.</p>

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#### 16.9.2 Public Education and Outreach Program Modifications

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

### Description

Identify modifications made to the public education program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

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<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
03/29/2022	2021 - 2022 Review of Public Education and Outreach Program	<p>The City of Detroit Lakes established a public education and outreach program on August 27, 2021. The City continued to review the educational plan throughout the 2021 year.</p> <p>On March 29, 2022, staff review the public education and outreach program. It was determined that the program continues to fit the needs of the MS4 permit.</p> <p>Attached is the educational and outreach program plan.</p>

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## 17 MCM 2: Public Participation/ Involvement

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

### **Description:**

#### **17.1 MCM 2: Public Participation/Involvement. [Minn. R. 7090]**

**17.2** New permittees must develop and implement, and existing permittees must revise their current program, as necessary, and continue to implement, a Public Participation/ Involvement program to solicit public input on the SWPPP and involve the public in activities that improve or protect water quality. The permittee must incorporate Section 17 requirements into their program.

**17.3** Each calendar year, the permittee must provide a minimum of one (1) opportunity for the public to provide input on the adequacy of the SWPPP. The permittee may conduct a public meeting(s) to satisfy this requirement, provided appropriate local public notice requirements are followed and the public is given the opportunity to review and comment on the SWPPP.

**17.4** The permittee must 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. [Minn. Stat. 13]

**17.5** The permittee must consider oral and written input regarding the SWPPP submitted by the public to the permittee.

**17.6** Each calendar year, the permittee must provide a minimum of one (1) public involvement activity that includes a pollution prevention or water quality theme (e.g., rain barrel distribution event, rain garden workshop, cleanup event, storm drain stenciling, volunteer water quality monitoring, adopt a storm drain program, household hazardous waste collection day, etc.).

**17.7** The permittee must document the following information:

- a. all relevant written input submitted by persons regarding the SWPPP;
- b. 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;
- c. date(s), location(s), and estimated number of participants at events held for purposes of compliance with item 17.3;
- d. notices provided to the public of any events scheduled to meet item 17.3, including any electronic correspondence (e.g., website, e-mail distribution lists, notices, etc.); and
- e. date(s), location(s), description of activities, and estimated number of participants at events held for the purpose of compliance with item 17.6.

**17.8** The permittee must conduct an annual assessment of the Public Participation/Involvement program to evaluate program compliance, the status of achieving the measurable requirements in Section 17 and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., public input and involvement opportunities, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

## Best Management Practices

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### 17.2 Public Participation/ Involvement Program

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

**Required:** Yes

#### Description

*(New Permittees)* Develop and implement...(or)

*(Existing permittees)* Revise and continue to implement...

...the current Public Participation/ Involvement Program as necessary to meet current MS4 permit and SWPPP requirements to solicit public input on the SWPPP and to involve the public in activities that improve or protect water quality.

#### Goals

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##### 17.2.1 Public Participation/ Involvement Program

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

#### Description

Prepare or update, maintain and implement a Public Participation/ Involvement Program in compliance with the MS4 permit requirements (17.3-17.8).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

Activity Date	Name	Description
08/27/2021	2021 - 2022 Education and Outreach Plan	<p>The City of Detroit Lakes created an MS4 Education and Outreach plan relative to Storm Water Pollution Prevention Plan (SWPPP) Minimum Control Measure (MCM 1) on August 27, 2021.</p> <p>The MS4 Education and Outreach Plan is available on the City's website at: <a href="https://cityofdetroitlakes.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uploads/MS4...">https://cityofdetroitlakes.com/vertical/Sites/%7BF991A069-E23D-412C-8132-49318B273050%7D/uploads/MS4...</a></p> <p>Education and Outreach Plan has been reviewed and no changes were needed for 2022. Plan Reviewed: March 31, 2022</p>

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### 17.3 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

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##### 17.3.1 Annual Public Meeting Notice

**Responsible Staff / Position:**

#### 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).

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.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
03/11/2021	2021 MS4 Annual Public Meeting	<p>The meeting notice was published in the local newspaper (Detroit Lakes Tribune and Becker County Record) on February 24, 2021, and March 3, 2021. The 2021 Annual Meeting was held on March 11, 2021, to discuss the Municipal Separate Storm Sewer System which includes review of the 2020 annual report and conducting the 2021 annual meeting.</p> <p>Attached is the annual meeting minutes.</p> <p>There is approximately 3,000 viewers of the Detroit Lakes newspapers.</p>
03/10/2022	2022 MS4 Annual Public Meeting	<p>The meeting notice was published in the local newspaper (Detroit lakes Tribune) on February 23, 2022 and March 2, 2022. The 2022 annual meeting was held on March 10, 2022, to discuss the Municipal Separate Storm Sewer System which includes review of the 2021 annual report and conducting the 2022 annual meeting.</p> <p>Attached is the annual meeting minutes and affidavit of publication for the meeting.</p> <p>There is approximately 3,000 viewers for the Detroit Lakes Newspapers.</p>

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03/09/2023

2023 MS4 Annual Public Meeting

The meeting notice was published in the local newspaper (Detroit Lakes Tribune on March 1, 2023 and March 4, 2023. The 2023 annual meeting was held on March 9, 2023, to discuss the Municipal Separate Storm Sewer System which includes review of the 2022 annual report and conducting the 2023 annual meeting.

Attached is the annual meeting minutes and affidavit of publication for the meeting.

There is approximately 3,000 viewers of the Detroit Lakes Newspapers.

**17.3.2 Conduct Public Meeting**

**Responsible Staff / Position:**

**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 following information:

1. Description of the event
2. Event date and venue
3. A copy of the agenda and description of any distributed materials and posted exhibits
4. Number of participants.
5. A summary of verbal input and copies of relevant written input submitted by the public
6. Responses to written input received regarding the SWPPP, including a summary of any modifications made to the SWPPP as a result of the written input received

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
03/11/2021	2021 Annual Public Meeting	The City of Detroit Lakes held there annual MS4 public meeting on March 11, 2021, to get public input on water quality issues and City's Stormwater Pollution Plan.  A copy of the 2020 SWPPP report was presented for public review.
03/10/2022	2022 Annual Public Meeting	The City of Detroit Lakes held there annual MS4 public meeting on March 10, 2022, to get public input on water quality issues and City's Stormwater Pollution Plan.  A copy of the 2021 SWPPP report was present for public review.
03/09/2023	2023 Annual Public Meeting	The City of Detroit Lakes held there annual MS4 public meeting on March 9, 2023, to get public input on water quality issues and the City's Stormwater Pollution Plan.  A Copy off the 2022 SWPPP report was present for public review.

## 17.4 Public Access to SWPPP Documents

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

**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

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#### 17.4.1 Website Access to SWPPP Documents

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

### 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.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
03/30/2022	2020 - 2021 SWPPP and Annual Report	<p>The 2020 SWPPP and Annual Report were added to the City's website located at: <a href="https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055">https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055</a>.</p> <p>After reviewing the City's MS4 website, both documents were add to the website on March 30, 2022.</p> <p>See attachment for picture on the website.</p> <p>Added the 2021 SWPPP report and Annual Report to the City's website at the same location above. (Attached is a picture of the addition to the website. - Added on July 21, 2022</p>

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#### 17.4.2 SWPPP Program Document Access

**Responsible Staff / Position:**

### 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.

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<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
03/17/2023	2021 - 2023 SWPPP Printed Documents	The City of Detroit Lakes has the SWPPP documents available on the website or can be picked up at the City of Detroit Lakes office upon written request.  Checked website for SWPPP Documents Activity Dates:  December 31, 2021 December 30, 2022 March 17, 2023

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## 17.5 Public Input Review and Consideration

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

**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

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#### 17.5.1 Consider Public Input

**Responsible Staff / Position:**

### 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 the following information:

1. Description of the meeting or event
2. Event date and venue
3. A copy of the agenda and description of any distributed materials and posted exhibits
4. Number of participants.
5. A summary of verbal input and copies of relevant written input submitted by the public
6. Responses to written input received regarding the SPPP, including a summary of any modifications made to the SWPPP as a result of the written input received

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021 - 2022 Public Comments	<p>The City of Detroit Lakes has a section on the website where residents can leave comments, questions, or concerns and a staff member will contact them by phone or email.</p> <p><a href="https://cityofdetroitlakes.com/index.asp?SEC={2CFFBF48-64EB-42A7-852D-67F6CB59B71B}&amp;Type=QUICKFORM">https://cityofdetroitlakes.com/index.asp?SEC={2CFFBF48-64EB-42A7-852D-67F6CB59B71B}&amp;Type=QUICKFORM</a></p> <p>In 2021, there was no public comments for the City of Detroit Lakes.</p> <p>During 2022, there was no public comments for the City of Detroit Lakes through the City comment section.</p>

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## 17.6 Public Involvement Activity

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

**Required:** Yes

### Description

Provide a minimum of one (1) public involvement activity annually that includes a pollution prevention or water quality theme (e.g., rain barrel distribution event, rain garden workshop, cleanup event, storm drain stenciling, volunteer water quality monitoring, adopt a storm drain program, household hazardous waste collection day, etc.).

### Goals

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#### 17.6.1 Public Involvement Activity

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

### Description

Provide at least one public involvement activity annually that includes a pollution prevention or water quality theme. (Examples include a rain barrel distribution event, rain garden workshop, cleanup event, storm drain stenciling, volunteer water quality monitoring, adopt a storm drain program, household hazardous waste collection day, etc.)

Document each public involvement activity with at least the following information:

1. Description of event
2. Event date and location
3. Estimated number of participants
4. Description (or uploaded copy) of any educational information distributed to participants

**Planned:** 2022 2023 2024 2025 2026

**Complete:**

Activity Date	Name	Description
12/31/2021	2021 Water Festival and Day of Caring	The City of Detroit Lakes planned to hold the 2021 Water Festival and Day of Caring activities but was unable to hold it both due to COVID.
04/29/2022	2022 Water Festival	<p>The City of Detroit Lakes along with the following agencies: Becker County Public Health, MN Rural Water/MN Department of Health, Becker County Soil and Water, Becker County Environmental Services, Pelican River Watershed District, MN Pollution Control Agency, Becker County Museum, Essentia Health, and the MN Department of Natural Resources hosted the 2022 Water Festival.</p> <p>The Water Festival is given to the fourth grade elementary students located in the Detroit Lakes Public Schools. There were approximately 170 students at the Water Festival.</p> <p>Students were given information to encourage them</p>

to adopt environmental values and positive lifelong stewardship roles.

List of presenters for Lakes Country Water Festival:

1. City of DL Public Works – Storm Water Jetter Truck, Street Sweeper, MS4, Tree Planting Arbor Day
  2. Becker County Public Health – Effects of fluoride in city water for oral health
  3. MN Rural Water Association/MN Dept of Health – Groundwater model, aquifers, how water moves in different soil types and potential contaminates that can end up in groundwater
  4. Becker County Soil and Water – helping students understand the concept of invasive species and how they affect our lakes and rivers.
  5. Becker County Environmental Services – management of waste through composting
  6. Pelican River Watershed District – what a watershed is, demonstrate the watershed model
  7. MN Pollution Control Agency – water quality jeopardy
  8. Becker County Museum – water hydraulics interactive activity and trivia
  9. Sally Hausken City of DL - raingardens
  10. Garrett Penton Essentia Health – Water and your health, water in the human body, hydration/beverage, role of healthy drinking water, osmosis
  
  11. MN Department of Natural Resources – present a stream table to show water movement, talk about meander, channel, soil and bank erosion, floodplains, show how rivers form and change over geologic time.
- Attached is the schedule of presentations
-

## 17.7 Public Input Documentation

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

**Required:** Yes

### Description

Document the following information:

- a. all relevant written input submitted by persons regarding the SWPPP;
- b. 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;
- c. date(s), location(s), and estimated number of participants at events held for purposes of compliance with item 17.3;
- d. notices provided to the public of any events scheduled to meet item 17.3, including any electronic correspondence (e.g., website, e-mail distribution lists, notices, etc.); and
- e. date(s), location(s), description of activities, and estimated number of participants at events held for the purpose of compliance with item 17.6.

### Goals

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#### 17.7.1 Document Public Input

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

### Description

Document all relevant written input submitted by persons regarding the SWPPP, including a copy of the input, contact information for the party providing the input and whether a specific response to the written input is prepared and delivered.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

Activity Date	Name	Description
02/15/2022	2021 - 2022: See 17.3 & 17.6	Annual public input meeting. See Section 17.3 and 17.6.

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#### 17.7.2 Document Response to Public Input and Related SWPPP Modifications

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

### Description

Document the responses to written input received regarding the SWPPP, including any modifications made to the SWPPP as a result of the written input received;

Documentation should include:

- a. Reference to the input received.
- b. A copy of any direct response delivered to the party providing input.
- c. Description of SWPPP modifications completed in response to input received, and of any related update of published SWPPP documents or online resources.

**Planned:** 2022 2023 2024 2025 2026

**Complete:**

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<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021 - 2022 SWPPP Modifications	<p>The City of Detroit Lakes publishes the SWPPP on the City of Detroit Lakes website: <a href="https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055">https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055</a>.</p> <p>The public has not requested any modifications to the SWPPP documents in 2021 or 2022.</p>

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## 17.8 Public Participation/ Involvement Program Assessment

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

**Required:** Yes

### Description

Conduct an annual assessment of the Public Participation/ Involvement program to evaluate program compliance, the status of achieving the measurable requirements in the MS4 permit and SWPPP and determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

### Goals

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#### 17.8.1 Annual Public Participation Program Assessment

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

### Description

Conduct an annual assessment of the Public Participation/ Involvement Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021- 2022 Public Participation Program Assessment	<p>In 2021, the City of Detroit Lakes established a Public Education and Outreach plan.</p> <p>In 2022, the City of Detroit Lakes reviewed the Public Education and Outreach plan.</p> <p>Throughout 2021 and 2022, the City of Detroit Lakes staff held meetings to discuss public outreach.</p> <p>Staff meetings were held on:</p> <p>February 11, 2021 April 5, 2021 March 29, 2022 May 3, 2022 July 6, 2022 August 9, 2022</p>

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#### 17.8.2 Public Participation/ Involvement Program Modifications

**Responsible Staff / Position:**

### Description

Identify modifications made to the public education program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

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<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021- 2022 Public Participation and Involvement Modifications	The City of Detroit Lakes reviewed the annual public participation and involvement program and decided that no changes need to be made at this time.

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## **18 MCM 3: Illicit Discharge Detection and Elimination (IDDE)**

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

### **Description:**

**18.1 MCM 3: Illicit Discharge Detection and Elimination (IDDE).** [Minn. R. 7090]

**18.2** New permittees must develop, implement, and enforce, and existing permittees must revise their current program as necessary, and continue to implement and enforce, a program to detect and eliminate illicit discharges into the MS4. The permittee must incorporate Section 18 requirements into their program.

**18.3** The permittee must maintain a map of the permittee's MS4, as required in Section 14.

**18.4** To the extent allowable under state or local law, the permittee must develop, implement, and enforce a regulatory mechanism(s) that prohibits non-stormwater discharges into the permittee's MS4, except those non-stormwater discharges authorized in item 3.2. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee. The regulatory mechanism(s) must also include items 18.5 and 18.6, as applicable.

**18.5** For cities, townships, and counties, the permittee's regulatory mechanism(s) must require owners or custodians of pets to remove and properly dispose of feces on permittee owned land areas.

**18.6** For cities and townships, the permittee's regulatory mechanism(s) must require proper salt storage at commercial, institutional, and non-NPDES permitted industrial facilities. At a minimum, the regulatory mechanism(s) must require the following:

- a. designated salt storage areas must be covered or indoors;
- b. designated salt storage areas must be located on an impervious surface; and
- c. implementation of practices to reduce exposure when transferring material in designated salt storage areas (e.g., sweeping, diversions, and/or containment).

**18.7** The permittee must incorporate illicit discharge detection into all inspection and maintenance activities conducted in items 21.9, 21.10, and 21.11. Where feasible, the permittee must conduct illicit discharge inspections during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).

**18.8** At least once each calendar year, the permittee must train all field staff in illicit discharge recognition (including conditions which could cause illicit discharges) and reporting illicit discharges for further investigation. Field staff includes, but is not limited to, police, fire department, public works, and parks staff. Training for this specific requirement may include, but is not limited to, videos, in-person presentations, webinars, training documents, and/or emails.

**18.9** The permittee must ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's IDDE program. Individuals includes, but is not limited to, individuals responsible for investigating, locating, eliminating illicit discharges, and/or enforcement. The permittee must ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

**18.10** The permittee must maintain a written or mapped inventory of priority areas the permittee identifies as having a higher likelihood for illicit discharges. At a minimum, the permittee must evaluate the following for potential inclusion in the inventory:

- a. land uses associated with business/industrial activities;
- b. areas where illicit discharges have been identified in the past; and

c. areas with storage of significant materials that could result in an illicit discharge.

**18.11** To the extent allowable under state or local law, the permittee must conduct additional illicit discharge inspections in areas identified in item 18.10.

**18.12** The permittee must implement written procedures for investigating, locating, and eliminating the source of illicit discharges. At a minimum, the written procedures must include:

- a. a timeframe in which the permittee will investigate a reported illicit discharge;
- b. use of visual inspections to detect and track the source of an illicit discharge;
- c. tools available to the permittee to investigate and locate an illicit discharge (e.g., mobile cameras, collecting and analyzing water samples, smoke testing, dye testing, etc.);
- d. cleanup methods available to the permittee to remove an illicit discharge or spill; and
- e. name or position title of responsible person(s) for investigating, locating, and eliminating an illicit discharge.

**18.13** The permittee must implement written procedures for responding to spills, including emergency response procedures to prevent spills from entering the MS4. The written procedures must 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.

**18.14** The permittee must maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) in Section 18. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool;
- b. timeframes to complete corrective actions; and
- c. name or position title of responsible person(s) for conducting enforcement.

**18.15** The permittee must document the following information:

- a. date(s) and location(s) of IDDE inspections conducted in accordance with items 18.7 and 18.11;
- b. reports of alleged illicit discharges received, including date(s) of the report(s), and any follow-up action(s) taken by the permittee;
- c. date(s) of discovery of all illicit discharges;
- d. identification of outfalls, or other areas, where illicit discharges have been discovered;
- e. sources (including a description and the responsible party) of illicit discharges (if known); and
- f. action(s) taken by the permittee, including date(s), to address discovered illicit discharges.

**18.16** For each training in item 18.8 and 18.9, the permittee must document:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

**18.17** The permittee must document any enforcement conducted pursuant to the ERPs in item 18.14, including verbal warnings. At a minimum, the permittee must document 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);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

**18.18** The permittee must conduct an annual assessment of the IDDE program to evaluate program compliance, the status of achieving the measurable requirements in Section 18



and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., trainings, inventory, inspections, enforcement, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

## Best Management Practices

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### 18.2 IDDE Program

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

**Required:** Yes

#### Description

*(New permittees)* Develop, implement, and enforce...

*(Existing permittees)* Revise the current IDDE program as necessary and continue to implement and enforce the program to detect and eliminate illicit discharges into the MS4. Incorporate Section 18 requirements into the program.

#### Goals

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### 18.2.1 IDDE Program

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

#### Description

Prepare or update, maintain and implement an Illicit Discharge Detection and Elimination Program in compliance with the MS4 permit requirements (18.3-18.18).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

**Planned:** 2021 2022

**Complete:** 2021 2022

Activity Date	Name	Description
12/31/2021	2021 IDDE Program	Prepare or update, maintain and implement an Illicit Discharge Detection and Elimination Program in compliance with the MS4 permit requirements (18.3-18.18).  Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.
12/21/2022	2022 IDDE Program	Prepare or update, maintain and implement an Illicit Discharge Detection and Elimination Program in compliance with the MS4 permit requirements (18.3-18.18).  Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.  2022 Modifications - updated phone numbers for the Public Works Department

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### 18.3 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 Section 14) that depicts the following:

- a. the permittee's entire 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 coordinates;
- c. structural stormwater BMPs that are part of the permittee's MS4; and
- d. all receiving waters.

#### Goals

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##### 18.3.1 Develop Storm Sewer System Map

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

#### Description

Develop a storm sewer system map as required 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:** 2021 2022

**Complete:** 2021 2022

Activity Date	Name	Description
12/01/2021	2020 Storm Sewer System Map	A copy of the Storm sewer system map and inventory as required by Permit is attached. Steven Hanson updates the map on an "as needed" basis.
12/01/2022	2021-2022 Storm Sewer System Map	A copy of the Storm sewer system map and inventory as required by Permit is attached. Steven Hanson updates the map on an "as needed" basis.

##### 18.3.2 Annual 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/01/2022	2021-2022 Storm Sewer map	Develop and maintain a storm sewer system map. No changes were noted in 2021. No changes were noted for 2022

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## 18.4 Regulatory Mechanism - IDDE

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

**Required:** Yes

### Description

To the extent allowable under state or local law, develop, implement, and enforce a regulatory mechanism(s) that prohibits non-stormwater discharges into the permittee's MS4, except those non-stormwater discharges authorized in item 3.2 (Authorized Non-Stormwater Discharges).

A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the MS4.

The regulatory mechanism(s) must also include items 18.5 and 18.6, as applicable.

**18.5** For cities, townships, and counties, the permittee's regulatory mechanism(s) must require owners or custodians of pets to remove and properly dispose of feces on permittee owned land areas.

**18.6** For cities and townships, the permittee's regulatory mechanism(s) must require proper salt storage at commercial, institutional, and non-NPDES permitted industrial facilities. At a minimum, the regulatory mechanism(s) must require the following:

- a. designated salt storage areas must be covered or indoors;
- b. designated salt storage areas must be located on an impervious surface; and
- c. implementation of practices to reduce exposure when transferring material in designated salt storage areas (e.g., sweeping, diversions, and/or containment).

### Goals

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#### 18.4.1 IDDE Regulatory Mechanism

**Responsible Staff / Position:** Emily Jennings  
SEH Representative

### Description

Develop and adopt a regulatory mechanism to effectively prohibit non-stormwater discharges into the small MS4 as required. Review the IDDE regulatory mechanism and related policies and procedures each reporting period to improve the regulatory mechanism effectiveness

Summarize the results of the review as described each reporting period, including specific revisions required. Provide a copy of or link to the adopted IDDE regulatory mechanism.

**Planned:** 2021 2022

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
01/01/2021	Ordinance Number 381 (IDDE)	The purpose of this section is to set forth 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 ordinance establishes methods for controlling the introduction

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of pollutants into the Municipal Separate Storm Sewer System (MS4) in order to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit process. It will also regulate the contribution of pollutants to the MS4 by Stormwater discharges by any user, to prohibit illicit connections and discharges to the MS4, and to establish legal authority to carry out all inspection, surveillance, monitoring, and enforcement procedures necessary to ensure compliance with this ordinance.

02/11/2021	2021 IDDE Regulatory Mechanism	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. This was reviewed on Feb 11, 2021
09/13/2022	2022 Stormwater Illicit Discharge and Connection	The City of Detroit Lakes revised the Stormwater Illicit Discharge and Connection ordinance to meet the new permit requirements. The new ordinance replaces the old ordinance as City Code Section 1008.  The ordinance had the second reading and adoption at the City Council meeting held on September 13, 2022.

**18.4.2 Revisions - IDDE Regulatory Mechanism**

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

**Description**

Develop, adopt and implement revisions to the IDDE regulatory mechanism and associated policies or procedures as necessary to improve effectiveness and permit compliance.

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

**Planned:** 2022

**Complete:**

Activity Date	Name	Description
12/31/2021	2021 Stormwater Illicit Discharge and Connection	The City of Detroit Lakes staff reviewed the ordinance and made no changes to City Code 1008 in 2021.
07/13/2022	2022 Stormwater Illicit Discharge and Connection	The City of Detroit Lakes amended City Code 1008 to include the new MS4 permit requirements. The amended City Code was adopted on September 13, 2022.

**18.4.3 Enforcement - IDDE Regulatory Mechanism**

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

**Description**

Enforce provisions of the adopted IDDE regulatory mechanism and associated policies and procedures.

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

**Planned:** 2021 2022

**Complete:** 2021 2022

Activity Date	Name	Description
12/31/2021	2021 IDDE Regulatory Mechanism Enforcement Report	Attached is the summary of the enforcement actions taken in 18.17. In this summary you will find 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
12/22/2022	2022 IDDE Regulatory Mechanism Enforcement Report	Attached is the summary of the enforcement actions taken in 18.17. In this summary you will find 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
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### 18.5 Pet Waste Disposal Regulatory Requirement

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

**Required:** Yes

#### Description

Include requirements in the MS4 regulatory mechanism(s) for owners or custodians of pets to remove and properly dispose of feces from land areas owned by the permitted MS4.

#### Goals

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#### 18.5.1 Regulatory Requirement for Pet Waste Disposal

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

#### Description

Confirm that the MS4's regulatory mechanism includes provisions as described to require owners of custodians of pets to remove pet waste from public areas.

Provide a copy of or link to provisions in the MS4's regulatory mechanism in accordance with these requirements.

**Planned:** 2022 2023 2024 2025 2026

**Complete:** 2022

Activity Date	Name	Description
09/13/2022	2022 Pet Waste Ordinance	The City of Detroit Lakes adopted a pet waste ordinance in order to be in compliance with the new MS4 permit. The City adopted the ordinance at a Council meeting on September 13, 2022.  Attached is the pet waste ordinance.

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## 18.6 Salt Storage Regulator Requirements

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

**Required:** No

### Description

Include requirements for proper salt storage at commercial, institutional, and non-NPDES permitted industrial facilities. At a minimum, the MS4's regulatory mechanism(s) must require the following:

- a. designated salt storage areas must be covered or indoors;
- b. designated salt storage areas must be located on an impervious surface; and
- c. implementation of practices to reduce exposure when transferring material in designated salt storage areas (e.g. sweeping, diversions, and/ or containment)

### Goals

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#### 18.6.1 Proper Salt Storage Regulatory Requirements

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

### Description

Include requirements in the MS4 regulatory mechanism(s) to meet the stated requirements for salt storage at commercial, institutional and non-NPDES permitted industrial facilities, including at a minimum:

- a. designated salt storage areas must be covered or indoors;
- b. designated salt storage areas must be located on an impervious surface; and
- c. implementation of practices to reduce exposure when transferring material in designated salt storage areas (e.g. sweeping, diversions, and/ or containment)

Provide a copy of or link to provisions in the MS4's regulatory mechanism in accordance with these requirements.

**Planned:** 2022 2023 2024 2025 2026

**Complete:** 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
09/13/2022	2022 Salt Storage City Ordinance	On September 13, 2022, the City of Detroit Lakes adopted City Code 515: Salt and Deicing Material Storage. The ordinance was adopted in order to be in compliance with the new MS4 permit.

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## 18.7 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 the following permit items:

- 21.9 Structural Stormwater BMPs
- 21.10 Ponds and Outfalls

Where feasible, conduct illicit discharge inspections during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).

### Goals

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#### 18.7.1 Inspections for Illicit Discharges

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

### 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/31/2021	2021 Inspections for Illicit Discharge	Attached you will find the 2021 summary of routine inspections, including inspections done on structural stormwater BMPs, ponds, outfalls, stockpiles, storage and material handling areas conducted during periods of dry weather.  Any potential and confirmed illicit discharges are identified as part of routine inspections. Included are steps taken/to be taken to eliminate the illicit discharge and the result of the completed actions.
12/30/2022	2022 Inspections for Illicit Discharges	Attached you will find the 2022 summary of routine inspections, including inspections done on structural stormwater BMPs, ponds, outfalls, stockpiles, storage and material handling areas conducted during periods of dry weather.  Any potential and confirmed illicit discharges are identified as part of routine inspections. Included are steps taken/to be taken to eliminate the illicit discharge and the result of the completed actions.

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## 18.8 Field Staff Training - Illicit Discharge Recognition and Reporting

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

**Required:** Yes

### Description

Conduct annual (minimum) training for all field staff in illicit discharge recognition (including conditions which could cause illicit discharges) and reporting illicit discharges for further investigation.

Field staff includes, but is not limited to, police, fire department, public works, and parks staff. Training for this specific requirement may include, but is not limited to, videos, in-person presentations, webinars, training documents, and/or emails

### Goals

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#### 18.8.1 Field Staff Training - Illicit Discharge Recognition and Reporting

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

### Description

Provide illicit discharge identification and elimination in ongoing 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. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
05/13/2021	2021 Street Sweeping Webinar	a. This webinar focused on the value of street sweeping for controlling nutrient loading to receiving water and reducing phosphorous in stormwater. b. Shawn King, Public Works Director attended this course. c. The course was held May 13, 2021.
05/18/2021	2021 Smart Salting Certification	a. Minnesota Pollution Control Agency Smart Salting for Roads Certification Training. b. Those in attendance were John Cervantes, Scott Hanson & Kevin Larson. These employees are with the Public Works Department. c. The course took place through an online format on May 18, 2021
01/18/2022	2022 Smart Salting Certification	a. Minnesota Pollution Control Agency Smart Salting for Roads Certification Training. b. Those in attendance were Shawn King, Brennon Raser, Randy Brandt, and Nate Gerdes. These employees are with the Public Works Department. c. The course took place through an online format on January 18, 2022.

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04/01/2022

2022 Erosion & Stormwater  
Management Certification

Provide illicit discharge identification and elimination in ongoing 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. general subject matter covered; Erosion & Stormwater Management
- b. names and departments of individuals in attendance; Brian McCarthy, Public Works
- c. date of each event. Online, at own pace, April 2022

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05/17/2022

2022 Spring Staff training

Provide illicit discharge identification and elimination in ongoing 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. Topics covered:
    - 2022 Pollution Prevention and Good Housekeeping: P2GH: Pollution Prevention and Good Housekeeping for Stormwater Management - YouTube
    - Parks & Maintenance & Stormwater Protection: Parks Maintenance and Stormwater Protection Employee Training - YouTube
    - Rain Garden Maintenance: Rain Garden Maintenance Employee Training - YouTube
    - 2022 IDDE Training: Illicit Discharge Detection and Elimination (IDDE) - YouTube
  - b. Attached are sign in sheets of those who attended
  - c. Public Works had their training day on May 17, 2022. Part Time employees had their training as they began summer employment.
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## 18.9 Staff (Non-Field) Illicit Discharge Recognition and Reporting

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

**Required:** Yes

### Description

Provide initial training commensurate with individual's responsibilities as they relate to the IDDE program and ensure that refresher-training is provided every three (3) calendar years following the initial training.

Individuals includes, but is not limited to, those responsible for investigating, locating, eliminating illicit discharges, and/or enforcement.

### Goals

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#### 18.9.1 Non-Field Staff IDDE Training

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

### Description

Conduct initial training for new individuals and refresher training for all individuals as required.

Provide a summary of IDDE training provided each reporting period, including the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

**Planned:** 2021 2022 2024

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2021	2021 Non-Field Staff IDDE Training	<p>Conduct initial training for new individuals and refresher training for all individuals as required.</p> <p>On 4/6/21 training for the parks staff was conducted. Topics included multiple safety topics as well as MS4 topics (see attached) Those in attendance were James Clark &amp; Cory Baumgartner</p> <p>On 5/5/21 training for the summer parks &amp; arena staff was conducted. Topics included multiple safety topics as well as MS4 topics (see attached) Those in attendance were Kenny Anderson, Mike Carey, Murray Trieglaff, Flint Motschenbacher, Rollie Canham, Richard Schultz, Tyler Maruska &amp; Carson Hesse.</p> <p>On 12/21/21 training for the Warming House staff was conducted. Topics included multiple safety topics as well as MS4 topics (see attached) Those in attendance were Daulton Carlson and Neil Kuhlemeyer</p>

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12/30/2022

2022 Non-Field Staff IDDE Training

Conduct initial training for new individuals and refresher training for all individuals as required.

On 5/17/22 training was distributed to department heads to share with staff.

Topics included Identifying illicit discharge and pollution prevention

See attached rosters for attendance.

Links to training:

Identifying Illicit

Discharge: <https://www.youtube.com/watch?v=5bUleWbL1XI>

Pollution Prevention: P2GH: Pollution Prevention and Good Housekeeping for Stormwater Management

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## 18.10 Identify and Inspect Priority Areas for Potential Illicit Discharge

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

**Required:** Yes

### Description

Develop and maintain a written or mapped inventory of priority areas identified as having a higher likelihood for illicit discharges.

At a minimum, the permittee must evaluate the following for potential inclusion in the inventory:

- a. land uses associated with business/industrial activities;
- b. areas where illicit discharges have been identified in the past; and
- c. areas with storage of significant materials that could result in an illicit discharge.

### Goals

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#### 18.10.1 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/20/2021	2021 High Priority Area for Potential Illicit Discharge	This is an area between 10th and 11th Avenues Southeast. The closest businesses would be Lakeshirts at 750 Randolph Rd and BTD Manufacturing 1111 13th Ave SE.
12/20/2022	2022 Illicit Discharge Inspection Priority Area	The attached map shows an area between 10th and 11th Avenues Southeast. The closest businesses would be Lakeshirts at 750 Randolph Rd and BTD Manufacturing 1111 13th Ave SE.

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## 18.11 Inspection of Priority Areas for Illicit Discharges

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

**Required:** Yes

### Description

Conduct additional illicit discharge inspections in areas identified in item 18.10.

### Goals

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#### 18.11.1 Illicit Discharge Inspection - Priority Areas

**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 the following:

1. Date(s) of priority area inspections
2. Location(s) of priority area inspections
3. Report of any alleged illicit discharge detected
4. Source(s) (including a description and responsible party) of illicit discharges (if known)
5. Actions taken (including date(s)) to address discovered illicit discharges
6. Aa list of any illicit discharges identified with the status of resolution of the discharge.

**Planned:** 2022 2023 2024 2025 2026

**Complete:** 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
10/26/2022	2022 Illicit Discharge Inspection of Priority Area	<p>Inspect priority areas identified as likely to have priority discharges.</p> <p>Provide a summary of priority area inspections completed and inspection results each reporting period. Include the following:</p> <p>On October 26, 2022, Culvert #95-C-4 was inspected.</p> <p>Please see the attached documents for inspection findings.</p>

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## 18.12 Illicit Discharge Detection and Elimination Procedures

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

**Required:** Yes

### Description

Develop and implement written procedures for investigating, locating, and eliminating the source of illicit discharges. At a minimum, the written procedures must include:

- a. a timeframe for investigation of a reported illicit discharge;
- b. use of visual inspections to detect and track the source of an illicit discharge;
- c. tools available to investigate and locate an illicit discharge (e.g., mobile cameras, collecting and analyzing water samples, smoke testing, dye testing, etc.);
- d. cleanup methods available to remove an illicit discharge or spill; and
- e. name or position title of responsible person(s) for investigating, locating, and eliminating an illicit discharge.

### Goals

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#### 18.12.1 Develop and Maintain IDDE Procedures

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

### Description

Develop and maintain the procedures as described, including an annual review to consider revisions to improve permit compliance and program effectiveness.

Provide a reference to, or copy of, the current IDDE Procedures and a summary of revisions completed each reporting period.

**Planned:** 2021 2022

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
08/10/2022	2021-2022 IDDE Procedure	Develop and maintain the procedures as described, including an annual review to consider revisions to improve permit compliance and program effectiveness.
		Provide a reference to, or copy of, the current IDDE Procedures and a summary of revisions completed each reporting period.
		No changes were made in 2021 or 2022 Reviewed 12/10/21 & 3/29/22

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### 18.13 Illicit Discharge (Spill) Response Procedures

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

**Required:** Yes

#### Description

Develop and implement written procedures for responding to spills, including emergency response procedures to prevent spills from entering the MS4.

The written procedures must 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.

Review the procedures annually and modify as necessary to maintain permit compliance and program effectiveness.

#### Goals

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#### 18.13.1 Develop and Maintain 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. Review the procedures annually and update as necessary to maintain permit compliance and program effectiveness.

Provide a copy of or link to the required procedures, including a summary of any planned or completed revisions each reporting period.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
03/29/2022	2021-2022 Illicit Discharge Detection & Elimination Procedure	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 are Illicit Discharge Detection & Elimination chart and program & procedures documents.  No changes were made in 2021 or in 2022 Review 12/1/21 & 3/29/22
03/29/2022	2021-2022 Illicit Discharge Spill Response Procedures	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 are the spill response flowchart and procedure documents.  No changes were made in 2021 or in 2022 Reviewed 12/1/21 & 3/29/22

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**18.13.2 Implement Illicit Discharge ERP**

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

**Description**

Implement Illicit Discharge emergency response procedures to respond to contaminant spills and implement corrective actions.

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

**Planned:** 2021 2022

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
03/29/2022	2021-2022 Illicit Discharge ERP	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 are the spill response flowchart and procedure documents.  No changes were made in 2021 or in 2022 Reviewed 12/1/21 & 3/29/22

#### 18.14 ID Enforcement Response Procedures

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

**Required:** Yes

##### Description

Develop and maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) in Section 18. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool;
- b. timeframes to complete corrective actions; and
- c. name or position title of responsible person(s) for conducting enforcement.

##### Goals

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#### 18.14.1 Develop and Maintain Enforcement Response Procedures

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

##### Description

Develop enforcement response procedures to compel compliance with regulatory requirements as described. Review the procedures annually and update as necessary to maintain permit compliance and program effectiveness.

Provide a copy of or link to the required procedures, including a summary of any planned or completed revisions each reporting period.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/01/2022	2021 - 2022 Enforcement Response Procedure	Develop enforcement response procedures to compel compliance with regulatory requirements as described. Review the procedures annually and update as necessary to maintain permit compliance and program effectiveness.

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## 18.17 Enforcement Response Actions

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

**Required:** Yes

### Description

Document any enforcement conducted pursuant to the ERPs in item 18.14, including verbal warnings.

### Goals

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#### 18.17.1 ID Enforcement Action Report

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

### Description

For each Illicit Discharge enforcement response, document the following:

- a. name of the person responsible for violating the terms and conditions of the regulatory mechanism(s);
- b. date(s) and location(s) of the observed violation(s);
- c. description of the violation(s);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

**Planned:** 2021 2022

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
06/30/2021	2021 Enforcement Report	<ol style="list-style-type: none"><li>a. Casey's General Store is the responsible party</li><li>b. The spill occurred June 30, 2021 at 10:55am, located at 1306 US Hwy 10 East</li><li>c. 15 gallons of fuel leaked into storm drain</li><li>d. The Fire Department and Duty Officer was called. The clean up included pumping the storm sewer line associated with the leak site as well as inserted absorbent rolls to soak up any remaining fuel. These were left in place for three days.</li><li>e. Fire Department and MPCA Emergency Response.</li><li>f. Issue was resolved on June 30, 2022. The violation included an invoice for the clean up of the spill and labor involved.</li></ol>
05/17/2022	2022 Enforcement Report 5-17-22 - MX Underground	<ol style="list-style-type: none"><li>a. Alredo Ascencio with MX Underground is the responsible person for this incident.</li><li>b. On May 17, 2022, the violation occurred on Randolph Road in front of 750 Randolph Rd.</li><li>c. MX Underground was directional boring under the road when they hit a sanitary force main. This caused water to come out of the ground and run into the storm drain.</li><li>d. This incident is considered a "major discharge" so the State Duty Officer was called. Joe Braun with MPCA was on the scene. The spill was contained. A</li></ol>

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contractor fixed the repair and two vacor trucks were used to suck the sewage. Joe gave the all clear and said there were no environmental impacts.  
 e. State Duty Officer, MPCA  
 f. The issue was resolved on 5-18-22 with the completion of the contractor's work.

09/19/2022	2022 Enforcement Report - Dynamic Homes	<p>On September 12, 2022, Tom Gulon and John Cervantes found erosion and sediment discharge from the parking lot at Dynamic Homes at 525 Roosevelt Ave, Detroit Lakes, MN. They found scrap wood debris.</p> <p>On September 12, 2022 the sediment issue in the parking lot was addressed. The Public Works Department began cleaning the sediment deposition from the pond and fixing the askew outlet structure. The pond was cleaned on September 19.</p>
10/26/2022	2022 Enforcement Report - Waste Water Plant 10-26	<p>On October 26, 2022 at 1044 Willow St W, Waste Water Treatment Plant, Sellin Bros had been discharging concrete grindings from their work on Willow Street. This area is near Pond #51. Tom Gulon and Shawn King talked with Dave at Sellin Bros and explained MS4 and the MCM 3 IDDE and that they needed to stop immediately and clean up to prevent the concrete debris from entering the pond. Tom Gulon checked on October 27 and the concrete surry had been cleaned up.</p>
12/05/2022	2022 Enforcement Report - 209 Oak Grove Ave	<p>On December 5, 2022 it was noticed that Dennis Leier had been discharging waste water from his carpet cleaning van into the storm drain. He was pumping the chemicals directly down the drain. He received a verbal warning.</p> <p>He was directed to cease pumping down the storm drain and if he needed to continue to dump the chemicals to do so at the waste water plant.</p>
12/30/2022	2022 Leaves & Grass Violation Notices	<p>The attached document has the notices given to property owners for grass and leaves clippings deliberately discharged into the streets. The "door hanger" refers to the last two pages of the document.</p>
12/31/2022	2022 IDDE Spill/Investigation Reports-combined	<p>Grass clipping and Leave blowing violation forms are attached here.</p>

### 18.18 IDDE Program Annual Assessment

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

**Required:** Yes

#### Description

Conduct an annual assessment of the IDDE program to evaluate program compliance, the status of achieving the measurable requirements in Section 18 and determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

#### Goals

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#### 18.18.1 Annual IDDE Program Assessment

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

#### Description

Conduct an annual assessment of the Illicit Discharge Detection and Elimination Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

Activity Date	Name	Description
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None

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#### 18.18.2 IDDE Program Modifications

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

#### Description

Identify modifications made to the Illicit Discharge Detection and Elimination program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

**Planned:** 2021 2022

**Complete:** 2022

Activity Date	Name	Description
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None

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## **19 MCM 4: Construction Site Stormwater Runoff Control**

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

### **Description:**

#### **19.1 MCM 4: Construction Site Stormwater Runoff Control.**

**19.2** New permittees must develop, implement, and enforce, and existing permittees must revise their current program, as necessary, and continue to implement and enforce, a Construction Site Stormwater Runoff Control program. The program must address 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, within the permittee's jurisdiction and that discharge to the permittee's MS4. The permittee must incorporate Section 19 requirements into their program.

**19.3** To the extent allowable under state or local law, the permittee must develop, implement, and enforce a regulatory mechanism(s) that establishes requirements for erosion, sediment, and waste controls that is at least as stringent as the Agency's most current Construction Stormwater General Permit (MNR100001), herein referred to as the CSW Permit. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

**19.4** When the CSW Permit is reissued, the permittee must revise their regulatory mechanism(s), if necessary, within 12 months of the issuance date of that permit, to be at least as stringent as the requirements for erosion, sediment, and waste controls described in the CSW Permit.

**19.5** The permittee's regulatory mechanism(s) must require that owners and operators of construction activity develop site plans that must be submitted to the permittee for review and confirmation that regulatory mechanism(s) requirements have been met, prior to the start of construction activity. The regulatory mechanism(s) must require the owners and operators of construction activity to keep site plans up-to-date with regard to stormwater runoff controls. The regulatory mechanism(s) must require that site plans incorporate the following erosion, sediment, and waste controls that are at least as stringent as described in the CSW Permit:

- a. erosion prevention practices;
- b. sediment control practices;
- c. dewatering and basin draining;
- d. inspection and maintenance;
- e. pollution prevention management measures;
- f. temporary sediment basins; and
- g. termination conditions.

**19.6** The permittee must implement written procedures for site plan reviews conducted by the permittee prior to the start of all construction activity, to ensure compliance with requirements of the regulatory mechanism(s). At a minimum, the procedures must include:

- a. written notification to owners and operators proposing construction activity, including projects less than one acre that are part of a larger common plan of development or sale, of the need to apply for and obtain coverage under the CSW Permit; and
  - b. use of a written checklist, consistent with the requirements of the regulatory mechanism(s), to document the adequacy of each site plan required in item 19.5.
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**19.7** The permittee must implement an inspection program that includes written procedures for conducting site inspections, to determine compliance with the permittee's regulatory mechanism(s). The inspection program must also meet the requirements in items 19.8 and 19.9.

**19.8** The permittee must maintain written procedures for identifying high-priority and low-priority sites for inspection. At a minimum, the written procedures must include:

- a. a detailed explanation describing how sites will be categorized as either high-priority or low-priority;
- b. a frequency at which the permittee will conduct inspections for high-priority sites;
- c. a frequency at which the permittee will conduct inspections for low-priority sites; and
- d. the name(s) of individual(s) or position title(s) responsible for conducting site inspections.

**19.9** The permittee must implement a written checklist to document each site inspection when determining compliance with the permittee's regulatory mechanism(s). At a minimum, the checklist must include the permittee's inspection findings on the following areas, as applicable to each site:

- a. stabilization of exposed soils (including stockpiles);
- b. stabilization of ditch and swale bottoms;
- c. sediment control BMPs on all downgradient perimeters of the project and upgradient of buffer zones;
- d. storm drain inlet protection;
- e. energy dissipation at pipe outlets;
- f. vehicle tracking BMPs;
- g. preservation of a 50 foot natural buffer or redundant sediment controls where stormwater flows to a surface water within 50 feet of disturbed soils;
- h. owner/operator of construction activity self-inspection records;
- i. containment for all liquid and solid wastes generated by washout operations (e.g., concrete, stucco, paint, form release oils, curing compounds, and other construction materials); and
- j. BMPs maintained and functional.

**19.10** The permittee must implement 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.

**19.11** The permittee must ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's Construction Site Stormwater Runoff Control program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews, site inspections, and/or enforcement. The permittee must ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

**19.12** The permittee must maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) in item 19.3. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

**19.13** For each site plan review conducted by the permittee, the permittee must document

the following:

- a. project name;
- b. location;
- c. total acreage to be disturbed;
- d. owner and operator of the proposed construction activity;
- e. proof of notification to obtain coverage under the CSW Permit, as required in item 19.6, or proof of coverage under the CSW Permit; and
- f. any stormwater related comments and supporting completed checklist, as required in item 19.6, used by the permittee to determine project approval or denial.

**19.14** For each training in item 19.11, the permittee must document:

- a. general subject matter covered;
  - b. names and departments of individuals in attendance; and c. date of each event.
- 19.15** The permittee must document any enforcement conducted pursuant to the ERPs in item 19.12, including verbal warnings. At a minimum, the permittee must document 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);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

**19.16** The permittee must conduct an annual assessment of the Construction Site Stormwater Runoff Control program to evaluate program compliance, the status of achieving the measurable requirements in Section 19 and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., inventory, trainings, site plan reviews, inspections, enforcement, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

## Best Management Practices

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### 19.2 Construction Site Stormwater Runoff Control Program

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

**Required:** Yes

#### Description

*(New permittees)* Develop, implement, and enforce...

*(Existing permittees)* Review and revise the MS4's current program, as necessary, and continue to implement and enforce...

... a Construction Site Stormwater Runoff Control program. The program must address 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, within the MS4 jurisdiction and that discharge to the permittee's MS4. Incorporate all Section 19 requirements into their program.

#### Goals

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##### 19.2.1 Construction Site Stormwater Runoff Control Program

**Responsible Staff / Position:**

#### Description

Prepare or update, maintain and implement a Construction Site Stormwater Runoff Control Program in compliance with the MS4 permit requirements (19.3-19.16).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

Activity Date	Name	Description
None		

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### 19.3 Regulatory Mechanism - Erosion, Sediment and Waste Controls

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

**Required:** Yes

#### Description

To the extent allowable under state or local law, develop, implement, and enforce a regulatory mechanism(s) that establishes requirements for erosion, sediment, and waste controls that is at least as stringent as the Agency's most current Construction Stormwater General Permit (MNR100001), herein referred to as the CSW Permit.

A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

Revise their regulatory mechanism(s), if necessary, within 12 months of the issuance date of the CSW Permit, to be at least as stringent as the requirements for erosion, sediment, and waste controls described in the CSW Permit.

The regulatory mechanism(s) must require that owners and operators of construction activity develop site plans that must be submitted for review and confirmation that regulatory mechanism(s) requirements have been met, prior to the start of construction activity. The regulatory mechanism(s) must require the owners and operators of construction activity to keep site plans up-to-date with regard to stormwater runoff controls. The regulatory mechanism(s) must require that site plans incorporate the following erosion, sediment, and waste controls that are at least as stringent as described in the CSW Permit:

- a. erosion prevention practices;
- b. sediment control practices;
- c. dewatering and basin draining;
- d. inspection and maintenance;
- e. pollution prevention management measures;
- f. temporary sediment basins; and
- g. termination conditions.

#### Goals

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##### 19.3.1 ESC Regulatory Mechanism

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

#### Description

Develop, adopt, implement and maintain a regulatory mechanism to establish requirements for erosion and sediment controls and waste controls from construction activity as described. Review the regulatory mechanism and associated policies and procedures annually to maintain permit compliance and program effectiveness.

Summarize the results of the review as described each reporting period and provide a copy of or link to the adopted Construction Site Stormwater Runoff Control regulatory mechanism.

Activity Date	Name	Description
12/31/2021	2021 Stormwater Management Ordinance	The City of Detroit Lakes manages stormwater through City Code 1007. Attached is City Code 1007 which is currently being revised to meet the new permit requires.

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09/13/2022

2022 Stormwater Management Ordinance

The City of Detroit Lakes has revised the Stormwater Management ordinance to meet the new permit requirements. This ordinance is to replace the old Stormwater Management Ordinance as City Code Section 1007.

The ordinance had the second reading and adoption at the City Council meeting held on September 13, 2022.

**19.3.2 Revisions - ESC Regulatory Mechanism**

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

**Description**

Develop, adopt and implement revisions to the Construction Site Stormwater Runoff 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.

Activity Date	Name	Description
12/31/2021	2021 Revision of City Code 1007	City Code 1007 was reviewed and no changes were made.
09/13/2022	2022 Revision of City Code 1007	City Code 1007 was reviewed and changes were made to be in compliance with the new MS4 permit.  City Code 1007 was approved and adopted on September 13, 2022. See 19.3.1 for new ordinance.  Ordinance changes are in red (see attached).

**19.3.3 Enforcement - ESC Regulatory Mechanism**

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

**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 Construction Site Stormwater Runoff Control 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 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
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

Activity Date	Name	Description
None		

## 19.6 Site Plan Review - ESC

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

**Required:** Yes

### Description

Implement written procedures for site plan reviews conducted by prior to the start of all construction activity, to ensure compliance with requirements of the regulatory mechanism(s). At a minimum, the procedures must include:

- a. written notification to owners and operators proposing construction activity, including projects less than one acre that are part of a larger common plan of development or sale, of the need to apply for and obtain coverage under the CSW Permit; and
- b. use of a written checklist, consistent with the requirements of the regulatory mechanism(s), to document the adequacy of each site plan required in item 19.5 of the permit.

### Goals

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#### 19.6.1 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 at least the following for each site plan review conducted:

- a. project name;
- b. location;
- c. total acreage to be disturbed;
- d. owner and operator of the proposed construction activity;
- e. proof of notification to obtain coverage under the CSW Permit, as required in item 19.6 of the permit, or proof of coverage under the CSW Permit; and
- f. any stormwater related comments and supporting completed checklist, as required in item 19.6 of the permit, used by the permittee to determine project approval or denial.

**Planned:** 2022

**Complete:**

Activity Date	Name	Description
08/16/2022	2022 Engineer's Review Checklist	In 2022, the City adopted the attached Engineer's review for Land Disturbance Permit applications.

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#### 19.6.2 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.

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Activity Date	Name	Description
None		

**19.6.3 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, document the following:

- a. project name;
- b. location;
- c. total acreage to be disturbed;
- d. owner and operator of the proposed construction activity;
- e. proof of notification to obtain coverage under the CSW Permit, as required in item 19.6, or proof of coverage under the CSW Permit; and
- f. any stormwater related comments and supporting completed checklist, as required in item 19.6, used by the permittee to determine project approval or denial.

Activity Date	Name	Description
None		



## 19.7 Site Inspections - Construction

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

**Required:** Yes

### Description

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

### Goals

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#### 19.7.1 Develop Construction Site Inspection Procedures

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

### Description

Develop and implement an inspection program that includes written procedures for conducting site inspections, to determine compliance with the permittee's regulatory mechanism(s). The inspection program must also meet these requirements:

Maintain written procedures for identifying high-priority and low-priority sites for inspection that at a minimum must include:

- a. a detailed explanation describing how sites will be categorized as either high-priority or low-priority;
- b. a frequency at which the permittee will conduct inspections for high-priority sites;
- c. a frequency at which the permittee will conduct inspections for low-priority sites; and
- d. the name(s) of individual(s) or position title(s) responsible for conducting site inspections.

Develop and implement a written checklist to document each site inspection when determining compliance with the permittee's regulatory mechanism(s). At a minimum, the checklist must include the permittee's inspection findings on the following areas, as applicable to each site:

- a. stabilization of exposed soils (including stockpiles);
- b. stabilization of ditch and swale bottoms;
- c. sediment control BMPs on all downgradient perimeters of the project and upgradient of buffer zones;
- d. storm drain inlet protection;
- e. energy dissipation at pipe outlets;
- f. vehicle tracking BMPs;
- g. preservation of a 50 foot natural buffer or redundant sediment controls where stormwater flows to a surface water within 50 feet of disturbed soils;
- h. owner/operator of construction activity self-inspection records;
- i. containment for all liquid and solid wastes generated by washout operations (e.g., concrete, stucco, paint, form release oils, curing compounds, and other construction materials); and
- j. BMPs maintained and functional.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2021	2021 Site Inspection Process and Form	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.

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07/25/2022 Land Disturbance Permit Application The City of Detroit Lakes requires a Land Disturbance Permit for construction projects which are 1 acre in size or larger.

The application was updated on:

March 26, 2021  
July 25, 2022

12/31/2022 2022 Site Inspection Process and Form 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.

Form was reviewed and updated on August 16, 2022.

**19.7.2 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.

Activity Date	Name	Description
12/31/2022	2022 Site Inspection Process and Form	1. The entities responsible for completing site inspections shall complete the following actions: <ul style="list-style-type: none"> <li>a. Rate the site for priority of inspection based on:               <ul style="list-style-type: none"> <li>i. Topography (Sites with steep slopes or erodible channels may be given higher priority)</li> <li>ii. Soil characteristics (Sites with highly erodible soils may be given higher priority)</li> <li>iii. Type of receiving water (Special or impaired receiving waters may be given higher priority)</li> <li>iv. Stage of construction (Projects in earlier stages of construction may be given higher priority)</li> <li>v. Compliance history (Project or project owners with a history of noncompliance may be given higher priority)</li> <li>vi. Citizen complaints (Projects receiving citizen complaints may be given higher priority)</li> <li>vii. Project size (Larger projects may be given higher priority)</li> <li>viii. Other site specific and local characteristics.</li> </ul> </li> <li>b. Identify appropriate frequency for site inspections.               <ul style="list-style-type: none"> <li>i. High priority sites will be inspected at a minimum, three (3) times before the completion of the project.</li> <li>ii. Low priority sites will be inspected as needed, and at a minimum, one time before the completion of the project. (Contractors are required to inspect sites as indicated in the approved SWPPP and current MPCA NPDES Construction Permit)</li> </ul> </li> </ul>

**19.7.3 Conduct Construction Site Stormwater Runoff Control 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 and other means used to document site inspections.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
01/01/2021	Priscilla Gurath	2021-22 Land Disturbance Permit Inspections

## 19.10 Public Input - Construction Activities

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

**Required:** Yes

### Description

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

### Goals

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#### 19.10.1 Develop and Maintain Public Input Procedures

**Responsible Staff / Position:**

### Description

Develop and maintain procedures for receipt and consideration of reports of noncompliance or other construction activity related information by the public. Conduct an annual review of the procedures and revise as necessary to maintain program effectiveness and permit compliance.

Provide a copy of or link to the completed procedures with a summary of any planned or completed revisions completed in the reporting period.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2021	2021 - 2022 Construction Activity Non-Compliance	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.  Date: 12/31/2021 Date: 8/8/2022

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#### 19.10.2 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.

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

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### 19.11 Construction Site Stormwater Runoff Control Program Training

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

**Required:** Yes

#### Description

Ensure that individuals receive training commensurate with their responsibilities as they relate to the Construction Site Stormwater Runoff Control program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews, site inspections, and/or enforcement.

Ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

#### Goals

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### 19.11.1 Staff Training - Construction Site Stormwater Runoff Control Program

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

#### Description

Provide initial training commensurate with individual's responsibilities as they relate to the Construction Site Stormwater Runoff Program and ensure that refresher-training is provided every three (3) calendar years following the initial training.

Individuals includes, but is not limited to, those responsible for conducting site plan reviews, site inspections, and/or enforcement.

For each training, document the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

Activity Date	Name	Description
None		

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## 19.12 Enforcement Response Procedures - Construction Activity

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

**Required:** Yes

### Description

Develop and maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) for Construction Site Stormwater Runoff Control (Permit section 19.3)

At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

### Goals

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#### 19.12.1 Develop and Maintain ERP for Construction Activity

**Responsible Staff / Position:**

### Description

Develop and adopt Enforcement Response Procedures (ERP) for construction activity to enforce provisions of the regulatory mechanism, policies and procedures. Review the construction activity ERP annually and update as necessary to maintain effectiveness and permit compliance.

Provide a copy of or link to the adopted ERP for construction activity and a summary of any resulting revision to the ERP initiated or completed each reporting period.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2021	2021 ERPs Construction and Non-Compliance Complaint Issues	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.
08/08/2022	2022 ERP For Construction Activity	The City of Detroit Lakes is required to develop and implement adequate enforcement authority for construction activity that takes place within the boundaries of the Municipal Separate Storm Sewer System. The purpose of this Enforcement Response Plan is to communicate how the enforcement tools available to the City will be used to achieve compliance. The Enforcement Response Plan also specifies criteria by which City personnel can determine the enforcement action most appropriate to instances of non-compliance. This plan is a document of the City's procedure to be followed when a construction stormwater violation is discovered.

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### 19.15 Enforcement Reports - Construction Site Stormwater Runoff Control Program

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

**Required:** Yes

#### Description

Document any enforcement conducted pursuant to the Construction Site Stormwater Runoff Control Program ERPs (permit section 19.12), including verbal warnings.

#### Goals

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### 19.15.1 Enforcement Action Reporting - Construction Site Stormwater Runoff Control

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

#### Description

Document response actions conducted pursuant to the Construction Site Stormwater Runoff Program ERPs (Permit section 19.120, including verbal warnings).

At a minimum, the permittee must document 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);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

Activity Date	Name	Description
None		

### 19.16 Construction Site Stormwater Runoff Control Program Assessment

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

**Required:** Yes

#### Description

Conduct an annual assessment of the Construction Site Stormwater Runoff Control program to evaluate program compliance, the status of achieving the measurable requirements for Construction Site Stormwater Runoff Control (Permit Section 19) and determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

#### Goals

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#### 19.16.1 Annual Construction Site Stormwater Runoff Control Program Assessment

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

#### Description

Conduct an annual assessment of the Construction Site Stormwater Runoff Control Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021 - 2022 Program Assessment	In 2021, there were no changes made to City Code 1007.  In 2022, City Code 1007 was amended to update the necessary changes to meet the new permit requirements.

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#### 19.16.2 Construction Site Stormwater Runoff Control Program Modifications

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

#### Description

Identify modifications made to the Construction Site Stormwater Runoff Control Program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021 - 2022 City Code Changes	There was no changes made to City Code 1007 in 2021.  The changes that were made to City Code 1007 are attached. (Ordinance 10-1000 Land Use Update was made on July 27, 2022).

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## **20 MCM 5: Post-Construction Stormwater Management**

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

### **Description:**

#### **20.1 MCM 5: Post-Construction Stormwater Management.**

**20.2** New permittees must develop, implement, and enforce, and existing permittees must 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. The program must address construction activity 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 MS4. The permittee must incorporate Section 20 requirements into their program.

**20.3** To the extent allowable under state or local law, the permittee must develop, implement, and enforce a regulatory mechanism(s) that incorporates items 20.4 through 20.15. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

**20.4** The permittee's regulatory mechanism(s) must require owners of construction activity to submit site plans with post-construction stormwater management BMPs designed with accepted engineering practices to the permittee for review and confirmation that regulatory mechanism(s) requirements have been met, prior to start of construction activity.

**20.5** The permittee's regulatory mechanism(s) must require owners of construction activity to treat the water quality volume on any project where the sum of the new impervious surface and the fully reconstructed impervious surface equals one or more acres.

**20.6** For construction activity (excluding linear projects), the water quality volume must be calculated as one (1) inch times the sum of the new and the fully reconstructed impervious surface.

**20.7** For linear projects, the water quality volume must be calculated as the larger of one (1) inch times the new impervious surface or one-half (0.5) inch times the sum of the new and the fully reconstructed impervious surface. Where the entire water quality volume cannot be treated within the existing right-of-way, a reasonable attempt to obtain additional right-of-way, easement, or other permission to treat the stormwater during the project planning process must be made. Volume reduction practices must be considered first, as described in item 20.8. Volume reduction practices are not required if the practices cannot be provided cost effectively. If additional right-of-way, easements, or other permission cannot be obtained, owners of construction activity must maximize the treatment of the water quality volume prior to discharge from the MS4.

**20.8** Volume reduction practices (e.g., infiltration or other) to retain the water quality volume on-site must be considered first when designing the permanent stormwater treatment system. The General Permit does not consider wet sedimentation basins and filtration systems to be volume reduction practices. If the General Permit prohibits infiltration as described in item 20.9, other volume reduction practices, a wet sedimentation basin, or filtration basin may be considered.

**20.9** Infiltration systems must be prohibited when the system would be constructed in areas:

- a. that receive discharges from vehicle fueling and maintenance areas, regardless of the amount of new and fully reconstructed impervious surface;
- b. where high levels of contaminants in soil or groundwater may be mobilized by the infiltrating stormwater. To make this determination, the owners and/or operators of construction activity must complete the Agency's site screening assessment checklist, which is available in the Minnesota Stormwater Manual, or conduct their own assessment. The assessment must be retained with the site plans;
- c. where soil infiltration rates are more than 8.3 inches per hour unless soils are amended to slow the infiltration rate below 8.3 inches per hour;
- d. 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;
- e. of predominately Hydrologic Soil Group D (clay) soils;
- f. in an Emergency Response Area (ERA) within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, Subp. 13, classified as high or very high vulnerability as defined by the Minnesota Department of Health;
- g. in an ERA within a DWSMA classified as moderate vulnerability unless the permittee performs or approves a higher level of engineering review sufficient to provide a functioning treatment system and to prevent adverse impacts to groundwater;
- h. outside of an ERA within a DWSMA classified as high or very high vulnerability unless the permittee performs or approves a higher level of engineering review sufficient to provide a functioning treatment system and to prevent adverse impacts to groundwater;
- i. within 1,000 feet up-gradient or 100 feet down gradient of active karst features; or
- j. that receive stormwater runoff from these types of entities regulated under NPDES for industrial stormwater: automobile salvage yards; scrap recycling and waste recycling facilities; hazardous waste treatment, storage, or disposal facilities; or air transportation facilities that conduct deicing activities. See "higher level of engineering review" in the Minnesota Stormwater Manual for more information.

**20.10**

For non-linear projects, where the water quality volume cannot cost effectively be treated on the site of the original construction activity, the permittee must identify, or may require owners of the construction activity to identify, locations where off-site treatment projects can be completed. If the entire water quality volume is not addressed on the site of the original construction activity, the remaining water quality volume must be addressed through off-site treatment and, at a minimum, ensure the requirements of items 20.11 through 20.14 are met.

**20.11** The permittee must ensure off-site treatment project areas are selected in the following order of preference:

- a. locations that yield benefits to the same receiving water that receives runoff from the original construction activity;
- b. locations within the same Department of Natural Resource (DNR) catchment area as the original construction activity;
- c. locations in the next adjacent DNR catchment area up-stream; or
- d. locations anywhere within the permittee's jurisdiction.

**20.12** Off-site treatment 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. Routine maintenance of structural stormwater BMPs already required by the General Permit cannot be used to meet this requirement.

**20.13** Off-site treatment projects must be completed no later than 24 months after the start of the original construction activity. If the permittee determines more time is needed to complete the treatment project, the permittee must provide the reason(s) and schedule(s)

for completing the project in the annual report.

**20.14** If the permittee receives payment from the owner of a construction activity for off-site treatment, the permittee must apply any such payment received to a public stormwater project, and all projects must comply with the requirements in items 20.11 through 20.13.

**20.15** The permittee's regulatory mechanism(s) must include the establishment of legal mechanism(s) between the permittee and owners of structural stormwater BMPs not owned or operated by the permittee, that have been constructed to meet the requirements in Section 20. The legal mechanism(s) must 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 the owner of that structural stormwater BMP has not ensured proper function;
- b. 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; and
- c. are designed to protect/preserve structural stormwater BMPs. If structural stormwater BMPs change, causing decreased effectiveness, new, repaired, or improved structural stormwater BMPs must be implemented to provide equivalent treatment to the original BMP.

**20.16** The permittee must maintain a written or mapped inventory of structural stormwater BMPs not owned or operated by the permittee that meet all of the following criteria:

- a. the structural stormwater BMP includes an executed legal mechanism(s) between the permittee and owners responsible for the long-term maintenance, as required in item 20.15; and
- b. the structural stormwater BMP was implemented on or after August 1, 2013.

**20.17** The permittee must implement written procedures for site plan reviews conducted by the permittee prior to the start of construction activity, to ensure compliance with requirements of the permittee's regulatory mechanism(s).

**20.18** The permittee must ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's Post-Construction Stormwater Management program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews and/or enforcement. The permittee must ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

**20.19** The permittee must maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) required in Section 20. At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

**20.20** For each site plan review conducted by the permittee, the permittee must document the following:

- a. supporting documentation used to determine compliance with Section 20 of the General Permit, including any calculations for the permanent stormwater treatment system;
- b. the water quality volume that will be treated through volume reduction practices (e.g., infiltration or other) compared to the total water quality volume required to be treated;
- c. documentation associated with off-site treatment projects authorized by the permittee, including rationale to support the location of permanent stormwater treatment projects in accordance with items 20.10 and 20.11;
- d. payments received and used in accordance with item 20.14; and
- e. all legal mechanisms drafted in accordance with item 20.15, including date(s) of the agreement(s) and name(s) of all responsible parties involved.

**20.21** For each training in item 20.18, the permittee must document:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

**20.22** The permittee must document any enforcement conducted pursuant to the ERPs in item 20.19, including verbal warnings. At a minimum, the permittee must document 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);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

**20.23** The permittee must conduct an annual assessment of the Post-Construction Stormwater Management program to evaluate program compliance, the status of achieving the measurable requirements in Section 20, and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., inventory, trainings, site plan reviews, inspections, enforcement, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

## Best Management Practices

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### 20.2 Post-Construction Stormwater Management Program

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

**Required:** Yes

#### Description

*(New permittees)* Develop, implement, and enforce...

*(Existing permittees)* Revise your 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. The program must address construction activity 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 MS4. All Section 20 requirements must be incorporated into the program.

#### Goals

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### 20.2.1 Post-Construction Stormwater Management Program

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

#### Description

Prepare or update, maintain and implement a Post-Construction Stormwater Management Program in compliance with the MS4 permit requirements (20.3-20.23).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021 - 2022 - City Code 1007	The City of Detroit Lakes adopted an ordinance on February 13, 2018, for Erosion and Sediment Control which has been amended and added to the City Code 1007.  Attached is the ordinance which include General Provisions, Plan Procedures, SWPPP Design and Standards, Inspection and Maintenance, and Administration and Enforcement.  Revision: September 13, 2022

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## 20.3 Regulatory Mechanism - Post-Construction Stormwater Management

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

**Required:** Yes

### Description

To the extent allowable under state or local law, develop, implement, and enforce a regulatory mechanism(s) that incorporates permit items 20.4 through 20.15. A regulatory mechanism(s) for the purposes of the General Permit may consist of contract language, an ordinance, permits, standards, written policies, operational plans, legal agreements, or any other mechanism, that will be enforced by the permittee.

The regulatory mechanism(s) must:

- Require owners of construction activity to submit site plans with post-construction stormwater management BMPs designed with accepted engineering practices for review and confirmation that regulatory mechanism(s) requirements have been met, prior to start of construction activity.
- Require owners of construction activity to treat the water quality volume on any project where the sum of the new impervious surface and the fully reconstructed impervious surface equals one or more acres.
- Include the establishment of legal mechanism(s) between the permittee and owners of structural stormwater BMPs not owned or operated by the permittee, that have been constructed to meet the requirements in Section 20. The legal mechanism(s) must 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 the owner of that structural stormwater BMP has not ensured proper function;
  - b. 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; and
  - c. are designed to protect/preserve structural stormwater BMPs. If structural stormwater BMPs change, causing decreased effectiveness, new, repaired, or improved structural stormwater BMPs must be implemented to provide equivalent treatment to the original BMP.

### Goals

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#### 20.3.1 Post-Construction Regulatory Mechanism

**Responsible Staff / Position:**

### Description

Develop, adopt, implement and maintain a regulatory mechanism to establish requirements for post-construction stormwater management as described. Review the regulatory mechanism and associated policies and procedures annually to maintain permit compliance and program effectiveness.

Summarize the results of the review as described each reporting period and provide a copy of or link to the adopted Post-Construction Stormwater Management regulatory mechanism.

Activity Date	Name	Description
07/31/2022	2021 - 2022: City Code 1007	The City of Detroit Lakes maintains City Code 1007 for Stormwater Management. The City Code was last amended on February 13, 2018.  The City of Detroit Lakes is currently working on updating the City Code to meet the new permit

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regulations with the help of SEH.

Date: 12/31/2021

Date: 8/8/2022

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### 20.3.3 Revisions - Post-Construction Stormwater Management Regulatory Mechanism

#### Responsible Staff / Position:

#### 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.

Activity Date	Name	Description
12/31/2022	2021 - 2022 City Code 1007	<p>The City of Detroit Lakes maintains City Code 1007 for Stormwater Management. The City Code was last amended on February 13, 2018.</p> <p>The City of Detroit Lakes is currently working on updating the City Code to meet the new permit regulations with the help of SEH.</p> <p>Date: 12/31/2021 Date: 8/8/2022</p>

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### 20.3.4 Enforcement - Post-Construction Stormwater Management Requirements

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

#### 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

Activity Date	Name	Description
12/31/2022	2021 - 2022 Enforcement Response Procedures Post Construction	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.

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**20.16 Structural BMP Mapped Inventory**

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

**Required:** Yes

**Description**

Maintain a written or mapped inventory of structural stormwater BMPs not owned or operated by the permittee that meet all of the following criteria:

- a. the structural stormwater BMP includes an executed legal mechanism(s) between the permittee and owners responsible for the long-term maintenance, as required in item 20.15; and
- b. the structural stormwater BMP was implemented on or after August 1, 2013.

**Goals**

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**20.16.1 Maintain Structural BMP Mapped Inventory**

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

**Description**

Develop and maintain a mapped inventory of structural stormwater BMPs not owned or operated by the permittee. Review the inventory annually and update as necessary to address changes in existing BMPs or include new BMPs.

Provide a reference to or copy of the current mapped inventory each reporting period.

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



## 20.17 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 and all requirements stated in permit Sections 20.6 - 20.14.

### Goals

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#### 20.17.1 Develop Post-Construction Stormwater Management Review Procedures

**Responsible Staff / Position:**

### Description

Develop procedures for review of post-construction stormwater management plans as described, including notification procedures as required.

Provide a copy of or link to the required procedures.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021 - 2022 Post-Construction Enforcement	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.

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#### 20.17.2 Maintain Post-Construction Stormwater Management Review Procedures

**Responsible Staff / Position:**

### 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.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2022	2021 - 2022 Review Post Construction Procedures	In 2021 and 2022, the City of Detroit Lakes reviewed the procedures and made no changes.

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#### 20.17.3 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 each site plan review conducted by the permittee, document the following:

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- a. supporting documentation used to determine compliance with Section 20 of the General Permit, including any calculations for the permanent stormwater treatment system;
- b. the water quality volume that will be treated through volume reduction practices (e.g., infiltration or other) compared to the total water quality volume required to be treated;
- c. documentation associated with off-site treatment projects authorized by the permittee, including rationale to support the location of permanent stormwater treatment projects in accordance with items 20.10 and 20.11;
- d. payments received and used in accordance with item 20.14; and
- e. all legal mechanisms drafted in accordance with item 20.15, including date(s) of the agreement(s) and name(s) of all responsible parties involved.

Activity Date	Name	Description
None		

## 20.18 Post-Construction Stormwater Management Program Training

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

**Required:** Yes

### Description

Ensure that individuals receive training commensurate with their responsibilities as they relate to the permittee's Post-Construction Stormwater Management program. Individuals includes, but is not limited to, individuals responsible for conducting site plan reviews and/or enforcement. Ensure that previously trained individuals attend a refresher-training every three (3) calendar years following the initial training.

### Goals

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#### 20.18.1 Staff Training - Post-Construction Stormwater Management Program

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

### Description

Provide initial training commensurate with individual's responsibilities as they relate to the Post-Construction Stormwater Management Program and ensure that refresher-training is provided every three (3) calendar years following the initial training.

Individuals includes, but is not limited to, those responsible for conducting site plan reviews, site inspections, and/or enforcement.

For each training, document the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

Activity Date	Name	Description
<hr/>		
None		
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**20.19 Enforcement Response Procedures - Post-Construction Stormwater Management**

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

**Required:** Yes

**Description**

Develop and maintain written enforcement response procedures (ERPs) to compel compliance with the permittee's regulatory mechanism(s) for Post-Construction Stormwater Management (Permit Section 20.19).

At a minimum, the written ERPs must include:

- a. a description of enforcement tools available to the permittee and guidelines for the use of each tool; and
- b. name or position title of responsible person(s) for conducting enforcement.

**Goals**

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**20.19.1 Develop and Maintain ERP for Post-Construction Stormwater Management**

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

**Description**

Develop and adopt Enforcement Response Procedures (ERP) for Post-Construction Stormwater Management program activities to enforce provisions of the regulatory mechanism, policies and procedures. Review the ERP annually and update as necessary to maintain effectiveness and permit compliance.

Provide a copy of or link to the adopted ERP for Post-Construction Stormwater Management and a summary of any resulting revision to the ERP initiated or completed each reporting period.

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

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## 20.22 Enforcement Reports - Post-Construction Stormwater Management Program

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

**Required:** Yes

### Description

Document any enforcement conducted pursuant to the ERPs in item 20.19 for Post-Construction Stormwater Management, including verbal warnings.

### Goals

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## 20.22.1 Enforcement Action Reporting - Post-Construction Stormwater Management Program

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

### Description

Document response actions conducted pursuant to the Post-Construction Stormwater Management Program ERPs, including verbal warnings.

At a minimum, document 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);
- d. corrective action(s) (including completion schedule) issued by the permittee;
- e. referrals to other regulatory organizations (if any); and
- f. date(s) violation(s) resolved.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
<hr/>		
None		
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### 20.23 Post-Construction Stormwater Management Program Assessment

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

**Required:** Yes

#### Description

Conduct an annual assessment of the Post-Construction Stormwater Management program to evaluate program compliance, the status of achieving the measurable requirements in Section 20, and to determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

#### Goals

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### 20.23.1 Annual Post-Construction Stormwater Management Program Assessment

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

#### Description

Conduct an annual assessment of the Post-Construction Stormwater Management Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

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

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### 20.23.2 Post-Construction Stormwater Management Program Modifications

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

#### Description

Identify modifications made to the Post-Construction Stormwater Management Program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

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

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## **21 MCM 6: Pollution Prevention/ Good Housekeeping for Municipal Operations**

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

### **Description:**

#### **21.1 MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations**

**21.2** New permittees must develop and implement, and existing permittees must revise their current program, as necessary, and continue to implement, an operations and maintenance program that prevents or reduces the discharge of pollutants to the MS4 from permittee owned/operated facilities and operations. The permittee must incorporate Section 21 requirements into their program

**21.3** The permittee must maintain a written or mapped inventory of permittee owned/operated facilities that contribute pollutants to stormwater discharges. The permittee must implement BMPs that prevent or reduce pollutants in stormwater discharges from all inventoried facilities.

Facilities to be inventoried may include, but is not limited to:

- a. composting;
- b. equipment storage and maintenance;
- c. hazardous waste disposal;
- d. hazardous waste handling and transfer;
- e. landfills;
- f. solid waste handling and transfer;
- g. parks;
- h. pesticide storage;
- i. public parking lots;
- j. public golf courses;
- k. public swimming pools;
- l. public works yards;
- m. recycling;
- n. salt storage;
- o. snow storage;
- p. vehicle storage and maintenance (e.g., fueling and washing) yards; and
- q. materials storage yards

**21.4** The permittee must implement BMPs that prevent or reduce pollutants in stormwater discharges from 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, sand and sediment removal piles (e.g., effective sediment controls at the base of stockpiles on the downgradient perimeter);
- c. vehicle fueling, washing, and maintenance;
- d. routine street and parking lot sweeping;
- e. emergency response;
- 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; and
- k. application of herbicides, pesticides, and fertilizers

**21.5** The permittee must implement the following BMPs at permittee owned/operated salt storage areas:

- a. cover or store salt indoors;
- b. store salt on an impervious surface; and
- c. implement practices to reduce exposure when transferring material from salt storage areas (e.g., sweeping, diversions, and/or containment)

**21.6** The permittee must implement a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee. The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds).

**21.7** Each calendar year, the permittee must ensure all individuals that perform winter maintenance activities for the permittee receive training that includes:

- a. the importance of protecting water quality;
- b. BMPs to minimize the use of deicers (e.g., proper calibration of equipment and benefits of pretreatment, pre-wetting, and anti-icing); and
- c. tools and resources to assist in winter maintenance (e.g., deicing application rate guidelines, calibration charts, Smart Salting Assessment Tool). The permittee may use training materials from the Agency's Smart Salting training or other organizations to meet this requirement.

**21.8** The permittee must maintain written procedures 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.

**21.9** The permittee must inspect structural stormwater BMPs (excluding stormwater ponds, which are under a separate schedule below) each calendar year to determine structural integrity, proper function, and maintenance needs unless the permittee determines either of the following conditions apply:

- a. complaints received or patterns of maintenance indicate a greater frequency is necessary; or
- b. maintenance or sediment removal is not required after completion of the first two calendar year inspections; in which case the permittee may reduce the frequency of inspections to once every two (2) calendar years.

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

**21.11** Based on inspection findings, the permittee must determine if repair, replacement, or maintenance measures are necessary in order to ensure the structural integrity and proper function of structural stormwater BMPs and outfalls. The permittee must complete necessary maintenance as soon as possible. If the permittee determines necessary maintenance cannot be completed within one year of discovery, the permittee must document a schedule(s) for completing the maintenance.

**21.12** The permittee must implement a stormwater management training program commensurate with individual's responsibilities 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 training program must:

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- a. address the importance of protecting water quality;
- b. cover the requirements of the permit relevant to the responsibilities of the individual not already addressed in items 18.8, 18.9, 19.11, 20.18, and 21.7; and
- c. include a schedule that establishes initial training for individuals, including new and/or seasonal employees, and recurring training intervals to address changes in procedures, practices, techniques, or requirements.

**21.13** The permittee must document the following information associated with the operations and maintenance program:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected, for all inspections conducted in accordance with items 21.9 and 21.10;
- b. any adjustments to inspection frequency as authorized in item 21.9;
- c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;
- d. schedule(s) for maintenance of structural stormwater BMPs and outfalls as required in item 21.11; and
- e. stormwater management training events, including general subject matter covered, names and departments of individuals in attendance, and date of each event.

**21.14** The permittee must document pond sediment excavation and removal activities, including:

- a. a unique ID number and geographic coordinates 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; and
- d. location(s) of final disposal of sediment from each stormwater pond. [Minn. R. 7090]

**21.15** The permittee must conduct an annual assessment of the operations and maintenance program to evaluate program compliance, the status of achieving the measurable requirements in Section 21, and determine how the program might be improved. Measurable requirements are activities that must be documented or tracked as applicable to the MCM (e.g., inventory, trainings, inspections, maintenance activities, etc.). The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

## Best Management Practices

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### 21.2 Pollution Prevention/ Good Housekeeping Program

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

**Required:** Yes

#### Description

*(New permittees)* Develop and implement...

*(Existing permittees)* Revise, as necessary, and continue to implement,...

...an operations and maintenance program that prevents or reduces the discharge of pollutants to the MS4 from permittee owned/ operated facilities and operations. Incorporate Section 21 requirements into their program.

#### Goals

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### 21.2.1 Pollution Prevention/ Good Housekeeping Program

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

#### Description

Prepare or update, maintain and implement a Pollution Prevention/ Good Housekeeping Program in compliance with the MS4 permit requirements (21.2-21.15).

Provide a reference to or uploaded copy of the current program and summary description of modifications to the program completed in the reporting period.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021

Activity Date	Name	Description
12/20/2021	2018-2021 Public Works Annual Reports	Public Works Department maintenance of streets, sidewalks, alleys, storm sewer, Municipal Storm Sewer Systems (MS4), sanitary sewer, parks, trails, trails, arenas, outdoor rinks, animal control, forestry, and weed control.
12/29/2022	2022 Public Works Annual Report	Public Works Department maintenance of streets, sidewalks, alleys, storm sewer, Municipal Storm Sewer Systems (MS4), sanitary sewer, parks, trails, trails, arenas, outdoor rinks, animal control, forestry, and weed control. The attached report is a summary of the work done within the Public Works Department for the year 2022.

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### 21.3 Facilities Inventory

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

**Required:** Yes

#### Description

Maintain a written or mapped inventory of permittee owned/ operated facilities that contribute pollutants to stormwater discharges. The permittee must implement BMPs that prevent or reduce pollutants in stormwater discharges from all inventoried facilities.

Facilities to be inventoried may include, but is not limited to:

- a. composting;
- b. equipment storage and maintenance;
- c. hazardous waste disposal;
- d. hazardous waste handling and transfer;
- e. landfills;
- f. solid waste handling and transfer;
- g. parks;
- h. pesticide storage;
- i. public parking lots;
- j. public golf courses;
- k. public swimming pools;
- l. public works yards;
- m. recycling;
- n. salt storage;
- o. snow storage;
- p. vehicle storage and maintenance (e.g., fueling and washing) yards; and
- q. materials storage yards

#### Goals

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##### 21.3.1 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:** 2022 2023 2024 2025 2026

**Complete:** 2022

Activity Date	Name	Description
12/01/2021	Facility Site Inspection Form	The purpose of this inspection form is to assess compliance status, to assess effectiveness of Best Management Practices (BMPs), and to document improvements where needed.
12/06/2021	2021 Facility Inventory Form	Prepare and maintain an inventory of facilities currently owned and/ or operated by the MS4 that contribute pollutants to stormwater discharges.

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11/01/2022	2022 Facility Inspection Form	The purpose of this inspection form is to assess compliance status, to assess effectiveness of Best Management Practices (BMPs), and to document improvements where needed.
12/30/2022	2022 Facilities Inventory Form & inspections	Prepare and maintain an inventory of facilities currently owned and/ or operated by the MS4 that contribute pollutants to stormwater discharges.

## 21.4 BMPs for Municipal Facilities and Operations

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

**Required:** Yes

### Description

Develop and implement BMPs that prevent or reduce pollutants in stormwater discharges from 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, sand and sediment removal piles (e.g., effective sediment controls at the base of stockpiles on the downgradient perimeter);
- c. vehicle fueling, washing, and maintenance;
- d. routine street and parking lot sweeping;
- e. emergency response;
- 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; and
- k. application of herbicides, pesticides, and fertilizers.

### Goals

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#### 21.4.1 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
10/17/2022	2021-2022 Waste Disposal and Storage	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. Review dates: 12-31-2021 No changes were made to this BMP. 10-17-2022 No changes were made to this BMP.

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### 21.4.2 Material Stockpile 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 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
10/17/2022	2021-2022 Material Stockpile BMP	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. Review dates: 12-31-2021 No changes were made to this BMP. 10-17-2022 No changes were made to this BMP.

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### 21.4.3 Vehicle Fueling, Washing and Maintenance 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 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
10/17/2022	2021-2022 Vehicle Washing and Maintenance	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. Review dates: 12-31-2021 No changes were made to this BMP. 10-17-2022 No changes were made to this BMP.

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#### 21.4.4 Street/ Parking Lot Sweeping BMPs

**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.

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

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/31/2021	2021 Street Sweeping Schedule	Routine sweeping/schedules of streets and parking lots. Collected annually.
12/31/2021	2021 Street Sweeping Record	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.
10/17/2022	2021-2022 Street/Parking Lot Sweeping BMP	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. Review dates: 12-31-2021 No changes were made to this BMP. 10-17-2022 No changes were made to this BMP.
11/30/2022	2022 Street Sweeping Record	Routine sweeping/schedules of streets and parking lots. Collected annually.
11/30/2022	2022 Street Sweeping Schedule	Routine sweeping/schedules of streets and parking lots. Collected annually.

#### 21.4.5 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
10/17/2022	ERP	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. Review dates: 12-31-2021 10-17-2022 - no changes to ERP
10/17/2022	2021-2022 IDDE Program and Procedures	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. Review dates: 12-31-2021 - no changes made to the current program 10-17-2022 - no changes made to the current program

#### **21.4.6 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
10/17/2022	2021-2022 Cleaning Activity BMP	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. Review dates: 12-31-2021 No changes were made to this BMP. 10-17-2022 No changes were made to this BMP.



#### 21.4.7 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
10/17/2022	2021-2022 Significant Material BMP	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. Review dates: 12-31-2021 No changes were made to this BMP. 10-17-2022 No changes were made to this BMP.

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#### 21.4.8 Landscaping 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 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
04/06/2021	2021 Training	Brian McCarthy Recertification training
04/29/2022	2022 Training	Pesticide Applicator Training Jed Restad and John Cervantes were certified on April 29, 2022
10/17/2022	2021-2022 Landscaping BMP	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. Review dates: 12-31-2021 No changes were made to this BMP. 10-17-2022

No changes were made to this BMP.

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#### 21.4.9 Road Maintenance 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 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
10/17/2022	2021-2022 Road Maintenance BMP	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. Dates reviewed: 12-31-21 No changes were made to this BMP. 10-17-22 No changes were made to this BMP.

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#### 21.4.10 Right-of-Way Maintenance 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 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
10/17/2022	2021-2022 Right of Way Maintenance BMP	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. Dates reviewed: 12-31-21 No changes were made to this BMP. 10-17-22 No changes were made to this BMP.

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#### 21.4.11 Herbicide, Pesticide and Fertilizer 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 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
04/06/2021	2021 Training	2021 Brian McCarthy Pesticide Recertification Training
04/29/2022	2022 Pesticide Applicator Certification Training	Certification training for Jed Restad and John Cervantes on 4-29-22
10/17/2022	2021-2022 Herbicide, Pesticide and Fertilizer BMP	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. Dates reviewed: 12-31-21 10-17-22

#### 21.4.12 Cold Weather Operation 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 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
09/13/2022	2022 Winter Maintenance Training-Johnson	Danny Johnson attended Winter Maintenance training on September 13-14, 2022
10/17/2022	2021-2022 Cold Weather Operation BMP	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. Dates reviewed: 12-31-21 No changes were made to this BMP. 10-17-22

No changes were made to this BMP.

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**21.4.13 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:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
10/17/2022	2021-2022 Inventories Facilities BMPs	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. Dates reviewed: 12-31-21 No changes were made to this BMP. 10-17-22 No changes were made to this BMP.

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## 21.5 Salt Storage Practices

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

**Required:** Yes

### Description

Implement the following BMPs at permittee owned/ operated salt storage areas:

- a. cover or store salt indoors;
- b. store salt on an impervious surface; and
- c. implement practices to reduce exposure when transferring material from salt storage areas (e.g., sweeping, diversions, and/or containment).

### Goals

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#### 21.5.1 Salt Storage Practices

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

### Description

Describe permittee's BMPs implemented for permittee owned/ operated salt storage areas and material transfer practices. Review and update, as necessary, annually to maintain permit compliance and effectiveness.

Provide reference to or upload BMPs as described for the reporting period.

**Planned:** 2021 2022

**Complete:** 2021 2022

Activity Date	Name	Description
12/30/2021	2021 Salt Storage	<p>Describe permittee's BMPs implemented for permittee owned/ operated salt storage areas and material transfer practices. Review and update, as necessary, annually to maintain permit compliance and effectiveness.</p> <p>Attached is the Cold Weather Operations (salt storage BMP)</p>
09/13/2022	2022 Salt & Deicing Material Storage	<p>Detroit Lakes amended the City Code on 9-13-22 to add section 515 Salt and deicing material storage based on the 2020 permit. This new ordinance requires commercial, institutional, and non-NPDES permitted industrial facilities which store salt or deicing materials on-site to implement best management practices such as covering storage areas, locating the storage area on an impervious surface, and practices to reduce exposure.</p> <p>Attached is the Ordinance outlining this new practice.</p>

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## 21.6 Snow and Ice Management Policy

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

**Required:** Yes

### Description

Develop, Implement and maintain a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee.

The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds).

### Goals

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#### 21.6.1 Implement Snow and Ice Management Policy

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

### Description

Develop and implement a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee. The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds). Review the policy annually and revise as necessary to maintain permit compliance and program effectiveness.

Provide reference to or a copy of the policy as described, and summarize any revisions or updates adopted during the reporting period.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2021	2021-2022 Snow Ice Management Policy	Develop, Implement and maintain a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee.  The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds).
10/17/2022	2022 Snow & Ice Policy	Develop, Implement and maintain a written snow and ice management policy for individuals that perform winter maintenance activities for the permittee.  The policy must establish practices and procedures for snow and ice control operations (e.g., plowing or other snow removal practices, sand use, and application of deicing compounds).

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## 21.7 Staff Training - Winter Maintenance

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

**Required:** Yes

### Description

Ensure all individuals that perform winter maintenance activities for the permittee receive training each calendar year that includes:

- a. the importance of protecting water quality;
- b. BMPs to minimize the use of deicers (e.g., proper calibration of equipment and benefits of pretreatment, pre-wetting, and anti-icing); and
- c. tools and resources to assist in winter maintenance (e.g., deicing application rate guidelines, calibration charts, Smart Salting Assessment Tool).

The permittee may use training materials from the Agency's Smart Salting training or other organizations to meet this requirement.

### Goals

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#### 21.7.1 Develop Winter Maintenance Staff Training Program

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

### Description

Develop a winter maintenance staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.

Provide a copy of or link to the current winter maintenance training program each reporting period.

**Planned:** 2021 2022

**Complete:** 2021 2022

Activity Date	Name	Description
10/29/2021	2021 Winter Maintenance Staff Training Program	Develop a winter maintenance staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.  Attached is the 2021 Maintenance training program
12/01/2022	2022 Winter Maintenance Staff Training Program	Develop a winter maintenance staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.  Attached is the 2022 Maintenance training program. The snow and ice policy was updated in 2022.

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**21.7.2 Conduct Annual Winter Maintenance Staff Training**

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

**Description**

Conduct annual winter maintenance staff training.

For each training, document the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/13/2021	2021 Winter Maintenance Training	Conduct annual winter maintenance staff training.  a. General winter maintenance, salting and reducing the negative impacts of snow and ice control are topics covered. b. See attached roster c. Date of training was December 13, 2021  Links to training: Part 1 - Winter Maintenance Training for Small Sites - YouTube Part 2 - Winter Maintenance Training for Small Sites - YouTube
10/19/2022	2022 Winter Maintenance Training	a. General winter maintenance, smart salting training and reducing the negative impacts of snow and ice control are topics covered. b. See attached roster. c. Date of training: October 19, 2022  Link to training video: <a href="https://www.youtube.com/watch?v=J_PBZN_9">https://www.youtube.com/watch?v=J_PBZN_9</a>



## 21.8 Pond Treatment Effectiveness Procedures

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

**Required:** Yes

### Description

Develop and maintain written procedures 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.

### Goals

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#### 21.8.1 Develop Procedures for Determining Pond Treatment Effectiveness

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

### Description

Develop and maintain written procedures 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. Review annually and revise as necessary to maintain permit compliance and program effectiveness.

Provide a reference to or copy of the procedures as described each reporting period. Summarize and updates or revisions adopted through the reporting period.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/01/2021	2021-2022 Pond Treatment Effectiveness Plan	Develop and maintain written procedures 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. Review annually and revise as necessary to maintain permit compliance and program effectiveness.  Reviewed 12-01-2021. No changes were made at this time Reviewed 5-25-2022. No changes were made to the plan at this time.

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## 21.9 Pond and Outfall Inspections

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

**Required:** Yes

### Description

Prior to the expiration date of the General Permit, must conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs.

### Goals

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#### 21.9.1 Conduct Pond Inspections

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

### Description

Prior to the expiration date of the General Permit, conduct at least one inspection of all ponds to determine structural integrity, proper function, and maintenance needs.

For each pond inspection, record:

- Date(s) and description of findings, including whether or not an illicit discharge is detected
- Date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/20/2021	2021 Pond Inspections	Prior to the expiration date of the General Permit, must conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs.
12/31/2022	2022 Pond Inspections	Prior to the expiration date of the General Permit, must conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) in order to determine structural integrity, proper function, and maintenance needs.

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#### 21.9.2 Conduct Outfall Inspections

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

### Description

Conduct at least one inspection of all outfalls (excluding underground outfalls) to determine:

1. Structural integrity,
  2. Proper function, and
  3. Maintenance needs
-

For each outfall inspection, record:

- Date(s) and description of findings, including whether or not an illicit discharge is detected
- Date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;
- Schedule(s) for maintenance of outfalls

**Planned:** 2021 2022

**Complete:** 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/30/2022	2022 Outfall Inspections	<p>Conduct at least one inspection of all outfalls (excluding underground outfalls) to determine structural integrity, proper function, and maintenance needs.</p> <p>For each outfall inspection, document the date(s) and description of findings, including whether or not an illicit discharge is detected, the date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected, and the schedule(s) for maintenance of outfalls.</p>

## 21.10 Structural Stormwater BMP Inspections

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

**Required:** Yes

### Description

Inspect structural stormwater BMPs each calendar year to determine structural integrity, proper function, and maintenance needs unless the permittee determines either of the following conditions apply:

- a. complaints received or patterns of maintenance indicate a greater frequency is necessary; or
- b. maintenance or sediment removal is not required after completion of the first two calendar year inspections; in which case the permittee may reduce the frequency of inspections to once every two (2) calendar years.

### Goals

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#### 21.10.1 Conduct Annual Inspection of Structural Stormwater BMPs

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

### Description

Inspect structural stormwater BMPs each calendar year to determine:

1. Structural integrity
2. Proper function, and
3. Maintenance needs

Document the following information:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected
- b. any adjustments to inspection frequency as authorized in item 21.9;
- c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/20/2021	2021 Structural Stormwater BMP Inspections excluding ponds & outfalls	Conduct annual inspections of structural BMPs to determine structural integrity, proper function and maintenance needs. Adjust the inspections 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 inspections findings each reporting period.
05/24/2022	2022 Structural Stormwater BMP Inspections	Conduct annual inspections of structural BMPs to determine structural integrity, proper function and maintenance needs. Adjust the inspections 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 inspections findings each reporting period.

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12/30/2022	2021-2022 Underground Infiltration Inspection & Maintenance Program	Inspection and Maintenance of Underground Infiltration systems procedure
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**21.10.2 Conduct Special Inspections of Structural Stormwater BMPs**

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

**Description**

Inspect structural stormwater BMPs on a more frequent than annual basis based on complaints received or patterns of maintenance indicating greater frequency to determine:

1. Structural integrity
2. Proper function, and
3. Maintenance needs

Document the following information:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected
- b. any adjustments to inspection frequency as authorized in item 21.9;
- c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;

Activity Date	Name	Description
None		

**21.10.3 Biannual Structural Stormwater BMP Inspections**

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

**Description**

Inspect structural stormwater BMPs for which completion of two consecutive annual inspections determine maintenance or sediment removal is not required biannually to determine:

1. Structural integrity
2. Proper function, and
3. Maintenance needs

Document the following information:

- a. date(s) and description of findings, including whether or not an illicit discharge is detected
- b. any adjustments to inspection frequency as authorized in item 21.9;
- c. date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected;

Activity Date	Name	Description
None		

## 21.11 Maintenance - Structural Stormwater BMPs and Outfalls

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

**Required:** Yes

### Description

Determine if repair, replacement, or maintenance measures are necessary based on inspection findings to ensure the structural integrity and proper function of structural stormwater BMPs and outfalls. Complete necessary maintenance as soon as possible to prevent or reduce the discharge of pollutants to stormwater. If the necessary maintenance cannot be completed within one year of discovery, document a schedule(s) for completing the maintenance.

### Goals

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#### 21.11.1 Structural Stormwater BMP and Outfall Maintenance Schedule

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

### Description

Based on structural stormwater BMP and outfall inspections, develop a schedule for maintenance as required in Permit Section 21.11.

Provide reference to or a copy of the maintenance schedule each reporting period.

**Planned:** 2021 2022

**Complete:** 2021 2022

Activity Date	Name	Description
10/29/2021	2021 Structural Stormwater BMP & Outfall Maintenance	Based on structural stormwater BMP and outfall inspections, develop a schedule for maintenance as required in Permit Section 21.11.
12/27/2022	2021-2022 Inspection & Maintenance of Rain Gardens Schedule	Based on structural stormwater BMP and outfall inspections, develop a schedule for maintenance as required in Permit Section 21.11.
12/27/2022	2022 Structural Stormwater BMP & Outfall Maintenance	Based on structural stormwater BMP and outfall inspections, develop a schedule for maintenance as required in Permit Section 21.11.

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#### 21.11.2 Structural Stormwater BMP Maintenance

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

### 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, and whether an illicit discharge was detected, as a result of inspection findings.

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**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/20/2021	2021 Catch Basin Repairs	Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.
12/20/2021	2021 Manhole Repairs	Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.
12/20/2021	2021 Pond Cleaning	Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.
12/30/2022	2022 Manhole & Storm Drain Repairs	Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.
12/31/2022	2022 Catch Basin Repairs	Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.
12/31/2022	2022 Pond Cleaning	Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.
12/31/2022	2022 Culvert Repairs	Repair, replace or maintain structural stormwater BMPs based on inspection findings to ensure structural integrity, proper function and treatment effectiveness.

## 21.12 Staff Training - Stormwater Management Program

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

**Required:** Yes

### Description

Develop and implement a stormwater management training program commensurate with individual's responsibilities 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 training program must:

- a. address the importance of protecting water quality;
- b. cover the requirements of the permit relevant to the responsibilities of the individual not already addressed in items 18.8, 18.9, 19.11, 20.18, and 21.7; and
- c. include a schedule that establishes initial training for individuals, including new and/or seasonal employees, and recurring training intervals to address changes in procedures, practices, techniques, or requirements.

### Goals

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#### 21.12.1 Develop Stormwater Management Program Training

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

### Description

Develop a stormwater management staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.

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

**Planned:** 2021 2022

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
11/01/2021	2021 Stormwater Training Program	Develop a stormwater management staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.
12/01/2022	2022 Stormwater Training Program	Develop a stormwater management staff training program commensurate with employees' job-duties, as described. Review the training program annually and update as necessary to maintain permit compliance and training effectiveness.

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**21.12.2 Conduct Annual Stormwater Management Program Staff Training**

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

**Description**

Conduct annual stormwater management staff training.

For each training, document the following:

- a. general subject matter covered;
- b. names and departments of individuals in attendance; and
- c. date of each event.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/13/2021	2021 Stormwater Training	<p>Topics covered: Parks &amp; Maintenance &amp; Stormwater Protection: Parks Maintenance and Stormwater Protection Employee Training - YouTube Stormwater BMPs: attached with sign in sheets</p> <p>Training dates: April 6, 2021 May 5, 2021 December 13, 2021</p> <p>Tom Gulon received Professional Development hours for Erosion &amp; Stormwater Management</p> <p>Shawn King completed the annual conference on February 4, 2021 and received a certificate of completion.</p>
05/17/2022	2022 Stormwater Training	<p>Conduct annual stormwater management staff training.</p> <p>For each training, document the following: a. Topics covered: 2022 Pollution Prevention and Good Housekeeping: P2GH: Pollution Prevention and Good Housekeeping for Stormwater Management - YouTube Parks &amp; Maintenance &amp; Stormwater Protection: Parks Maintenance and Stormwater Protection Employee Training - YouTube Rain Garden Maintenance: Rain Garden Maintenance Employee Training - YouTube 2022 IDDE Training: Illicit Discharge Detection and Elimination (IDDE) - YouTube b. Attached are sign in sheets of those who attended c. Public Works had their training day on May 17, 2022. Part Time employees had their training as they began summer employment.</p>

## 21.14 Pond Dredging Documentation

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

**Required:** Yes

### Description

Document pond sediment excavation and removal activities, including:

- a. a unique ID number and geographic coordinates 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; and
- d. location(s) of final disposal of sediment from each stormwater pond.

### Goals

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#### 21.14.1 Pond Dredging Documentation

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

### Description

Develop and implement a process for documenting pond dredging activities to include the following:

- a. a unique ID number and geographic coordinates 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; and
- d. location(s) of final disposal of sediment from each stormwater pond.

Review the process annually and update as necessary to maintain permit compliance and effectiveness.

Include a reference to or copy of the current documentation process and a summary of any updates or revisions completed in the reporting period.

**Planned:** 2021 2022

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
05/25/2022	2021-2022 Pond Dredging documentation	<p>Develop and implement a process for documenting pond dredging activities to include the following:</p> <ol style="list-style-type: none"><li>a. a unique ID number and geographic coordinates of each stormwater pond from which sediment is removed;</li><li>b. the volume (e.g., cubic yards) of sediment removed from each stormwater pond;</li><li>c. results from any testing of sediment from each removal activity; and</li><li>d. location(s) of final disposal of sediment from each stormwater pond.</li></ol> <p>Review the process annually and update as necessary to maintain permit compliance and effectiveness.</p>

Reviewed 12/13/2021 - no changes were made to the existing plan  
Reviewed 5/25/2022 - no changes were made to the existing plan

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**21.14.2 Pond Dredging Reports**

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

**Description**

Provide reference to or copies of pond sediment excavation and removal activities through the reporting period as required.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/20/2021	2021 Pond Dredging Report	Provide reference to or copies of pond sediment excavation and removal activities through the reporting period as required.
12/30/2022	2022 Pond Dredging Report	Provide reference to or copies of pond sediment excavation and removal activities through the reporting period as required.

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## 21.15 Stormwater Operation and Maintenance Program Assessment

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

**Required:** Yes

### Description

Conduct an annual assessment of the operations and maintenance program to:

1. Evaluate program compliance,
2. Evaluate the status of achieving the measurable requirements in Section 21, and
3. Determine how the program might be improved.

Perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

### Goals

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#### 21.15.1 Annual Stormwater Operations and Maintenance Program Assessment

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

### Description

Conduct an annual assessment of the Stormwater Operations and Maintenance Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.

Provide a copy of an annual program assessment report meeting the stated requirements.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:** 2021 2022

Activity Date	Name	Description
12/13/2021	2021 Annual Stormwater Assessment	Conduct an annual assessment of the Stormwater Operations and Maintenance Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.  A small group met on December 13, 2021 to discuss MCM 6, section 15. The snow and ice policy will be updated in 2022.
05/25/2022	2022 Annual Stormwater Assessment	Conduct an annual assessment of the Stormwater Operations and Maintenance Program to evaluate program compliance and the status of achieving measurable requirements stated in the MS4 permit and SWPPP prior to each annual report.  The group met on May 25, 2022 to discuss MCM 6. The BMP's will need to be reviewed and updated to meet new permit.

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**21.15.2 Stormwater Operations and Maintenance Program Modifications**

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

**Description**

Identify modifications made to the Stormwater Operations and Maintenance Program to improve compliance with permit and SWPPP requirements resulting from the annual program assessment.

**Planned:** 2021 2022

**Complete:** 2021 2022

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/29/2022	2021-2022 Stormwater Operations & Maintenance Modifications	<p>In 2021, no modifications were made to the plan. The group had met on 12-13-2021 to discuss.</p> <p>In 2022, the following modifications were made:</p> <ul style="list-style-type: none"><li>- Detroit Lakes amended the City Code on 9-13-22 to add section 515 Salt and deicing material storage based on the 2020 permit. This new ordinance requires commercial, institutional, and non-NPDES permitted industrial facilities which store salt or deicing materials on-site to implement best management practices such as covering storage areas, locating the storage area on an impervious surface, and practices to reduce exposure.</li><li>- The snow and Ice policy was updated</li></ul>

## 22 Discharge to Impaired Waters

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

### Description:

#### **22.1 Discharges to Impaired Waters with a USEPA-Approved TMDL that Includes an Applicable WLA.**

**22.2** If the permittee has an applicable WLA not being met for **oxygen demand, nitrate, TSS, or TP**, the permittee must provide a summary of the permittee's progress toward achieving those applicable WLAs with the annual report.

The summary must include the following information:

- a. a list of all BMPs applied towards achieving applicable WLAs for oxygen demand, nitrate, TSS, and TP;
- b. the implementation status of BMPs included in the compliance schedule at the time of final application submittal; and
- c. an updated estimate of cumulative TSS and TP load reductions.

**22.3** If the permittee has an applicable WLA where a reduction in pollutant loading is required for **bacteria**, the permittee must maintain a written or mapped inventory of potential areas and sources of bacteria (e.g., dense populations of waterfowl or other bird, dog parks).

**22.4** If the permittee has an applicable WLA where a reduction in pollutant loading is required for **bacteria**, the permittee must maintain a written plan to prioritize reduction activities to address the areas and sources identified in the inventory in item 22.3.

The written plan must include BMPs the permittee will implement over the permit term, which may include, but is not limited to:

- a. water quality monitoring to determine areas of high bacteria loading;
- b. installation of pet waste pick-up bags in parks and open spaces;
- c. elimination of over-spray irrigation that may occur at permittee owned areas;
- d. removal of organic matter via street sweeping;
- e. implementation of infiltration structural stormwater BMPs; or
- f. management of areas that attract dense populations of waterfowl (e.g., riparian plantings).

**22.5** If the permittee has an applicable WLA where a reduction in pollutant loading is required for **chloride**, the permittee must document the amount of deicer applied each winter maintenance season to all permittee owned/operated surfaces.

**22.6** If the permittee has an applicable WLA where a reduction in pollutant loading is required for **chloride**, each calendar year the permittee must conduct an assessment of the permittee's winter maintenance operations to reduce the amount of deicing salt applied to permittee owned/operated surfaces and determine current and future opportunities to improve BMPs. The permittee may use the Agency's Smart Salting Assessment Tool or other available resources and methods to complete this assessment. The permittee must document the assessment.

The assessment may include, but is not limited to:

- a. operational changes such as pre-wetting, pre-treating the salt stockpile, increasing plowing prior to deicing, monitoring of road surface temperature, etc.;
- b. implementation of new or modified equipment providing pre-wetting, or other capability for minimizing salt use;
- c. regular calibration of equipment;
- d. optimizing mechanical removal to reduce use of deicers; or
- e. designation of no salt and/or low salt zones.

**22.7** If the permittee has an applicable WLA where a reduction in pollutant loading is required for **temperature** (i.e., City of Duluth, City of Hermantown, City of Rice Lake, City of Stillwater, MnDOT Outstate, St. Louis County, University of Minnesota - Duluth, and Lake Superior College), the permittee must maintain a written plan that identifies specific activities the permittee will implement to reduce thermal loading during the permit term.

The written plan may include, but is not limited to:

- a. implementation of infiltration BMPs such as bioinfiltration practices;
- b. disconnection and/or reduction of impervious surfaces;
- c. retrofitting existing structural stormwater BMPs; or
- d. improvement of riparian vegetation.

## Best Management Practices

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### 22.2 Oxygen Demand, Nitrate, TSS or TP Discharges

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

**Required:** Yes

#### Description

*(If the permittee has an applicable WLA not being met for oxygen demand, nitrate, TSS, or TP)*

Provide a summary of the permittee's progress toward achieving those applicable WLAs with the annual report.

The summary must include the following information:

- a. a list of all BMPs applied towards achieving applicable WLAs for oxygen demand, nitrate, TSS, and TP;
- b. the implementation status of BMPs included in the compliance schedule at the time of final application submittal; and
- c. an updated estimate of cumulative TSS and TP load reductions.

#### Goals

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### 22.2.1 Oxygen Demand, Nitrate, TSS or TP Discharge Summary

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

#### Description

Provide a report summarizing progress toward achieving applicable WLAs each reporting period, including the information required in Permit Section 22.2.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
04/06/2021	St. Clair Lake BMPs	Map showing BMPs installed in the St. Clair Lake watershed since the completion of the TMDL.

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## 22.4 Bacteria Discharges

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

**Required:** Yes

### Description

*(If the permittee has an applicable WLA where a reduction in pollutant loading is required for bacteria)*

Develop and maintain a written or mapped inventory of potential areas and sources of bacteria (e.g., dense populations of waterfowl or other bird, dog parks) and a written plan to prioritize reduction activities to address the areas and sources identified in the inventory in item 22.3.

The written plan must include BMPs the permittee will implement over the permit term, which may include, but is not limited to:

- a. water quality monitoring to determine areas of high bacteria loading;
- b. installation of pet waste pick-up bags in parks and open spaces;
- c. elimination of over-spray irrigation that may occur at permittee owned areas;
- d. removal of organic matter via street sweeping;
- e. implementation of infiltration structural stormwater BMPs; or f. management of areas that attract dense populations of waterfowl (e.g., riparian plantings).

### Goals

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#### 22.4.1 Inventory of Potential Bacteria Sources

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

### Description

Develop and maintain a written or mapped inventory of potential areas and sources of bacteria. Review the inventory annually and update as necessary.

Provide a reference to or copy of the current inventory each reporting period.

Activity Date	Name	Description
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None

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#### 22.4.2 Bacteria Reduction Plan

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

### Description

Develop and maintain a written plan to prioritize reduction activities to address the areas and sources identified in the inventory in item 22.3.

The written plan must include BMPs the permittee will implement over the permit term, which may include, but is not limited to:

- a. water quality monitoring to determine areas of high bacteria loading;
  - b. installation of pet waste pick-up bags in parks and open spaces;
  - c. elimination of over-spray irrigation that may occur at permittee owned areas;
  - d. removal of organic matter via street sweeping;
  - e. implementation of infiltration structural stormwater BMPs; or f. management of areas that attract dense populations of waterfowl (e.g., riparian plantings).
-

Provide a reference to or copy of the current plan, including any updates or revisions completed, each reporting period.

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

## 22.5 Chloride Discharges

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

**Required:** Yes

### Description

*(If the permittee has an applicable WLA where a reduction in pollutant loading is required for chloride)*

Document the amount of deicer applied each winter maintenance season to all permittee owned/operated surfaces each year and conduct an annual assessment of the permittee's winter maintenance operations to reduce the amount of deicing salt applied to permittee owned/operated surfaces and determine current and future opportunities to improve BMPs. The permittee may use the Agency's Smart Salting Assessment Tool or other available resources and methods to complete this assessment. The permittee must document the assessment.

The assessment may include, but is not limited to:

- a. operational changes such as pre-wetting, pre-treating the salt stockpile, increasing plowing prior to deicing, monitoring of road surface temperature, etc.;
- b. implementation of new or modified equipment providing pre-wetting, or other capability for minimizing salt use;
- c. regular calibration of equipment;
- d. optimizing mechanical removal to reduce use of deicers; or
- e. designation of no salt and/or low salt zones.

### Goals

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#### 22.5.1 Deicer Use Documentation

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

### Description

Provide a reference to or copy of documentation the amount of deicer applied each winter maintenance season to all permittee owned/operated surfaces.

Activity Date	Name	Description
None		

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#### 22.5.2 Annual Winter Operations Assessment of Deicer Application

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

### Description

Document the annual assessment as described. Include a reference to or copy of the current annual assessment, including all the requirements listed in Permit Section 22.6.

Activity Date	Name	Description
None		

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## 22.7 Thermal Loading Reduction Plan

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

**Required:** Yes

### Description

*(If the permittee has an applicable WLA where a reduction in pollutant loading is required for temperature (i.e., City of Duluth, City of Hermantown, City of Rice Lake, City of Stillwater, MnDOT Outstate, St. Louis County, University of Minnesota - Duluth, and Lake Superior College)).*

Maintain a written plan that identifies specific activities the permittee will implement to reduce thermal loading during the permit term.

The written plan may include, but is not limited to:

- a. implementation of infiltration BMPs such as bioinfiltration practices;
- b. disconnection and/or reduction of impervious surfaces;
- c. retrofitting existing structural stormwater BMPs; or
- d. improvement of riparian vegetation.

### Goals

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#### 22.7.1 Thermal Load Reduction Plan

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

### Description

Provide reference to or a copy of the current thermal loading reduction plan as described and a summary of any updates or revisions completed each reporting period.

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

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## **25 Annual SWPPP Assessment, Annual Reporting, and Record Keeping**

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

### **Description:**

#### **25.1 Annual Assessment, Annual Reporting, and Recordkeeping.**

**25.2** The permittee must conduct an annual assessment to evaluate compliance with the terms and conditions of the General Permit, including the effectiveness of the components of the SWPPP and the status of achieving the measurable requirements in the General Permit. Measurable requirements are activities that must be documented or tracked (e.g., education and outreach efforts, implementation of written plans, inventories, trainings, site plan reviews, inspections, enforcement, etc.).

The permittee must perform the annual assessment prior to completion of each annual report and document any modifications made to the SWPPP as a result of the annual assessment.

**25.3** The permittee must submit an annual report : Due annually, by the 30th of June. The annual report must cover the portion of the previous calendar year during which the permittee was authorized to discharge stormwater under the General Permit.

The annual report shall be submitted to the Agency, in a manner determined by the Agency, that includes but is not limited to:

- a. 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 measurable requirements of each of the MCMs. 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;
- b. the stormwater activities the permittee plans to undertake during the next reporting cycle;
- c. a change in any identified BMPs for any of the MCMs;
- d. the summary required in item 22.2 to demonstrate progress toward achieving applicable WLAs;
- e. information required to be recorded or documented in Sections 13 through 24; and
- f. 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.

**25.4** The permittee must 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).

**25.5** The permittee must 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 the General 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.

**25.6** The permittee must, when requested by the Commissioner, submit within a reasonable time the information and reports that are relevant to the control of pollution regarding the construction, modification, or operation of the facility covered by the General Permit or regarding the conduct of the activity covered by the General Permit.

The permittee must use an electronic submittal process, as provided by the Agency, to submit information required by the General Permit. If electronic submittal is not available, the permittee must use the following mailing address:

Supervisor, Municipal Stormwater Unit  
Minnesota Pollution Control Agency  
520 Lafayette Road  
North St. Paul, Minnesota 55155-4194

## Best Management Practices

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### 25.2 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

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### 25.2.1 Annual SWPPP Assessment

**Responsible Staff / Position:**

#### Description

Provide reference to or a copy of the annual assessment report as required.

Activity Date	Name	Description
03/29/2022	2021 SWPPP Review	Employees reviewed the content of the 2021 SWPPP and new requirements for the new permit on March 29, 2022. Tasks were divided up for staff to be in compliance with the permit including reviewing old ordinances.  See memo attached for the meeting and staff members who were present.
12/31/2022	2022 SWPPP Review	Staff held a series of meetings to review the 2021 SWPPP and discuss the progress of the 2022 SWPPP requires. Below are memos from the meeting that were held regarding the review.  Activity Dates:  May 3, 2022 May 25, 2022 July 6, 2022 August 9, 2022  See attached memos for details.
12/31/2023	2023 SWPPP Review	Staff held a series of meetings to review the 2022 SWPPP and discuss the progress of the 2023 SWPPP requires. Below are the memos from the meetings that were held regarding the review.  Activity Dates:  April 20, 2023

See attached memos for details.

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### 25.3 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 and meeting all the conditions and requirements of Permit Section 25.3.

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).

#### Goals

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##### 25.3.1 Annual Report

**Responsible Staff / Position:**

#### Description

Provide a reference to or copy of the Annual Report as filed each reporting period. Identify how the permittee meets public access requirements for the annual reports, including components of the SWPPP, available to the public as required.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
05/19/2021	2020 MS4 Annual Report	The City of Detroit Lakes submitted its Ms4 Annual Report for 2021, covering reporting period of January 1, 2020 through December 31, 2020. A copy of the annual report is attached. The annual report was submitted on May 19, 2021.
03/31/2022	2020 MS4 Annual Report - Website	The 2020 Annual Report was entered onto the City's website on March 31, 2022.  The report is located on the City's website: <a href="https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055">https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055</a> .
07/21/2022	2021 Annual Report	The City of Detroit Lakes submitted the 2021 Annual Report on May 19, 2022.  The City of Detroit Lakes added the 2021 Annual Report and 2021 Annual SWPPP report to the website on July 21, 2022.

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## 25.4 Public Access

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

**Required:** Yes

### Description

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).

### Goals

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#### 25.4.1 Public Access to Records

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

### Description

Confirm public access to records, including components of the SWPPP with a description of methods of access and hours of availability as required.

**Planned:** 2021 2022 2023 2024 2025 2026

**Complete:**

Activity Date	Name	Description
12/31/2021	2020 SWPPP Report	<p>The 2020 SWPPP report can be viewed in multiple ways.</p> <ol style="list-style-type: none"><li>1) The 2020 SWPPP was added to the City's website on March 31, 2022. Residents can view the SWPPP at the following location: <a href="https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055">https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055</a></li><li>2) Residents can come to the City Administration Building and request a copy of the SWPPP during regular business hours which is Monday through Friday from 8:00am to 4:30pm.</li><li>3) Residents can request a copy of the SWPPP through the City's website by contacting a staff member or through a Quick Form: <a href="https://cityofdetroitlakes.com/index.asp?SEC={2CFFBF48-64EB-42A7-852D-67F6CB59B71B}&amp;Type=QUICKFORM">https://cityofdetroitlakes.com/index.asp?SEC={2CFFBF48-64EB-42A7-852D-67F6CB59B71B}&amp;Type=QUICKFORM</a>.</li></ol>
07/21/2022	2021 SWPPP Report	<ol style="list-style-type: none"><li>1) The 2020 SWPPP was added to the City's website on July 21, 2022. Residents can view the SWPPP at the following location: <a href="https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055">https://cityofdetroitlakes.com/index.asp?SEC=3EE6EA65-60C6-4C6C-9A4E-E0077B4A8055</a></li><li>2) Residents can come to the City Administration Building and request a copy of the SWPPP during regular business hours which is Monday through Friday from 8:00am to 4:30pm.</li></ol>

3) Residents can request a copy of the SWPPP through the City's website by contacting a staff member or through a Quick Form: <https://cityofdetroitlakes.com/index.asp?SEC={2CFFBF48-64EB-42A7-852D-67F6CB59B71B}&Type=QUICKFORM>.

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## 25.5 Record Keeping

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

**Required:** Yes

### Description

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 the General 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

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#### 25.5.1 Confirm Record Keeping

**Responsible Staff / Position:**

### Description

Confirm permittee's compliance with record keeping requirements per Permit Section 25.5.

<b>Activity Date</b>	<b>Name</b>	<b>Description</b>
12/31/2023	2021 - 2023 Permit Documents	The City of Detroit Lakes stores MS4 Documents on PermiTrack, Laserfiche, and S Drive.  Staff enter documentation on PermiTrack upon completion of activities.

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