



COMPREHENSIVE MS4 PROGRAM MANAGEMENT

Bolton & Menk, Inc. is a company built on serving municipal public clients, including Municipal Separate Storm Sewer System (MS4) communities across Minnesota. Our commitment has been unwavering throughout our nearly 70-year history and has enabled us to build a significant municipal, county, and state public client practice. Our proven approach to MS4 Program Management is to be a readily-available extension of city staff and includes the following critical philosophies:

→ Share a Common Commitment to Environmental Stewardship

You have made several commitments to your community and its environmental assets through a series of minimum control measures (MCM). Our MS4 experts and client service managers live, work, and play in the same recreational resources that you do and share your commitment to protecting them.

→ Alleviate Day-To-Day Stresses of MS4 Program Management

Our vast municipal service experience has taught us that public works staff are often stretched thin. As an extension of your staff, our approach to MS4 Program Management is to assist you in implementing your MCM commitments so city staff can focus on day-to-day operations and achieve the environmental stewardship goals that matter most to you.

→ Balance Cost Effectiveness, Efficiency, and Personal Service

We will not leave you with a packet of materials and checklists that simply serve as a document management system. Since we are experienced in managing all aspects of an effective MS4 Program, we will work with you to customize support services that provide you the utmost comfort and confidence through the entire 5-year permit period. We will share our knowledge and resources, ultimately leading to budget savings.

Effective and Efficient MS4 Program Management

Our vast knowledge, technical resources, and data management will give you confidence that your MS4 Program is effectively and efficiently managed. We will work closely with all levels of city staff to meet each MCM requirement. We also recommend other programmatic items to ensure critical deadlines are met

throughout the year. Our joint MS4 Program team will work closely to ensure there are no surprises and that we are ready for a Program Audit, should it occur during the permit period. We are ready to offer expert staff in a multitude of disciplines to give you the right expertise for the job.

Bolton & Menk is ready to help facilitate this comprehensive list of services:

- A.** Reissue MS4 Permit
- B.** Maintain MS4 Program annually
- C.** Develop program procedures, regulatory mechanism, enforcement response procedures, and MS4 infrastructure inventories
- D.** Prepare for and pass MPCA MS4 Program audit

A. Reissue MS4 Permit in 2018-2020

The MPCA has committed to issuance of the new MS4 permit on Monday, November 16, 2020. This will also include release of responses to public comment, permit application forms, and guidance materials. Current MS4 permittees will have 150 days to complete and submit the permit application forms to the MPCA. Bolton & Menk's MS4 Professionals are ready to help you establish appropriate budgets and to complete the application and update your SWPPP for the next 5-year permit cycle.

MS4 Permit Reissuance and Reauthorization Schedule	
May 2019 - June 2019	Pre-Public Notice and Comment
June 2019 - November 2019	Permit Language Revised
November 2019 - January 2020	Official Public Comment Period
November 2020	MPCA Reissue MS4 Permit
November 2020 - April 2021	Submit Section II of permit application/SWPPPs
<i>Timelines Vary</i>	Update SWPPPs to meet requirements of new permit

**Applications will be divided into three groups to spread out review periods and deadlines.*

B. Maintain MS4 Program Annually

Each year the MPCA requires a number of items to be reported in the MS4 Annual Report. Bolton & Menk assembles these Annual Reports for numerous MS4 communities across Minnesota. We understand many of these tasks are typically left for city staff to complete. Bolton & Menk will work with you continuously throughout the year to meet milestones and annual requirements. That is, our

staff will work as an extension of yours to ensure you are not left high and dry at the end of the year. Based on the level of staff commitment you are able to provide, our MS4 experts will help fill in the remaining gaps.

See page B for Annual Program Maintenance task list.

C. Develop Program Procedures, Regulatory Mechanisms, Enforcement Response Procedures, and MS4 Infrastructure Inventories

In addition to the Annual Program Maintenance requirements, Bolton & Menk has developed an entire suite of MS4 Program documents and procedures to cost effectively meet the requirements of the MS4 Permit. While you may have already developed many of these materials, we will work with you to review what you have and identify gaps or improvements that could further support your program and promote environmental sustainability. We will not leave you with a document management tool. As an extension of your staff, we will provide you with a comprehensive and dynamic program that is meant to be changed over time as your community needs change. We also have several educational and training tools that could

easily be incorporated into your program. As municipal managers ourselves, we understand the tremendous pressure city and public works staff are under year round. Our intent is to support your program and help you identify where your biggest gaps reside. The following is a menu of services we are capable of providing. We will sit down with you and other applicable staff to determine the items that make the most sense for you to cover, and where we can bridge the gaps.

See page C for Program Procedures, Regulatory Mechanism, Enforcement Response Procedures, and MS4 Infrastructure Inventories task list.

D. Prepare for and Pass MPCA MS4 Program Audit

An MPCA MS4 Program Audit is inevitable. All of the review procedures, facilities inspections, construction plan assessments, training, and documentation completed in your program is to ensure

- Your program is operating efficiently in accordance to the permit requirements
- As a team, we are fully engaged in the operations of your MS4
- The audit goes smoothly and is uncomplicated

Our approach to MS4 Program Management results in a comprehensive documentation database that results in a simple MS4 program audit. In the days preceding the audit,

we will work directly with you to collect all documentation and deliver all required documents to the MPCA. Our MS4 experts will sit with you at the table when the audit day arrives. For each audit we experience, meticulous notes, observations, and comments are recorded and shared with subsequent audits. This technique not only allows us to very quickly correct your MS4 practice immediately prior to an audit, but utilizes past and future audits to revise your program on the fly to ensure program gaps are closed. We continuously learn from every interaction with the MPCA and share that knowledge with all our client communities. This translates into *real time and money savings* for you.

WHY BOLTON & MENK

MS4 communities have an enormous responsibility to operate their stormwater management systems. You are committed to accomplishing minimum control measures, which can seem daunting for city staff to complete. Bolton & Menk acts as an extension of your staff. By relieving you of some of those tasks, you can focus on your commitment to environmental stewardship and achieve the goals of the MS4 permit that matter most to you. We are here to listen to your needs and work with you to develop a SWPPP that balances permitting requirements with realistic expectations of your staff.

TASK NO.	B. Annual Program Maintenance
1	Communication/Coordination/Ordinance Updates
1.1	Annually Review and Update Ordinances
1.2	Annually Review and Update Enforcement Response Procedures
1.3	Develop and Administer a Public Education Program
1.4	Hold a Minimum of One Public Meeting Per Year
1.5	Document and Respond to Complaints Received, as Needed by City Staff
1.6	Document Field Construction Site Assessments
1.7	Document BMP Inspections
2	Annual Training
2.1	Train Field Staff to Avoid Illicit Discharges
2.2	Train Field Staff to Recognize and Respond to Illicit Discharge by Others
2.3	Facilitate Public Education Events
2.4	Maintain/Encourage Partnerships with Organizations
2.5	Track Annual Training in a Database
3	Annual Reporting and Recordkeeping
3.1	Complete and Submit Annual Report to the MPCA
3.2	Update and Submit TMDL Annual Report
3.3	Update Facility Plan
3.4	Update Storm Sewer System Map and Inventory
3.5	Update Public And Private Water Bodies Inventory
3.6	MS4 Staff Coordination with the MPCA and Other MS4s
3.7	Summarize Site Plan Reviews Completed Annually
3.8	Summarize Construction Compliance Checks
3.9	Document and Summarize Violations
3.10	Summarize Storm Water Control Projects Authorized, Required, and Installed
4	Stormwater System Inspection
4.1	All Public Stormwater Structures
4.2	Inspect 20% of Public Ponds/Basins Annually
4.3	Inspect 20% of Private Ponds/Basins Annually
4.4	Inspect All Discharge Points Entering the MS4 Annually
4.5	Inspect All Discharges Leaving the MS4 Jurisdiction Annually
4.6	Identify and Eliminate Illicit Discharge
5	Construction and Permitting
5.1	Site Plan Review and Approval
5.2	Site Compliance Checks of All Permitted Sites

TASK NO.	C. Program Procedures, Regulatory Mechanism, Enforcement Response Procedures, and MS4 Infrastructure Inventories
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6	Regulatory Mechanisms
6.1	Best Management Practices (BMPs) to Minimize Erosion
6.2	BMPs to Minimize Discharge of Sediment and Other Pollutants
6.3	BMPs for Dewatering Activities
6.4	Site Inspections and Records of Rainfall Events
6.5	BMP Maintenance
6.6	Management of Solid and Hazardous Wastes on Each Project Site
6.7	Final Stabilization Upon Completion of Construction Activity
6.8	Criteria For The Use Of Temporary Sediment Basins
6.9	Prohibition of Illicit Discharges
6.10	Submittal of Site Plans with Post-Construction Stormwater BMPs

7	Enforcement Response Procedures (ERPs)
7.1	Develop and Implement ERPs
7.2	Document Occurrences of Enforcement

8	Mapping and Inventory
8.1	Develop and Manage a Comprehensive MS4 GIS Geodatabase
8.2	Description of How Data is Mapped and Inventoried
8.3	Database of 12" Pipe or Greater, Including Flow Direction
8.4	(X,Y) Coordinates of All Storm Sewer Outfalls
8.5	Map and Inventory All BMPs in your MS4 System
8.6	Identify All Receiving Waters
8.7	Map and Inventory All Stormwater Ponds Utilized for Stormwater Management
8.8	Identify All Lakes, Wetlands, and Streams

9	MCM 1 - Public Education and Outreach
9.1	Work with City Staff to Identify High Priority Issues
9.2	Develop Education Programs Surrounding High Priority Issues
9.3	Develop Educational Materials for Public Awareness of Illicit Discharge
9.4	Develop a Public Education Implementation Plan
9.5	Document All Occurrences of Public Education
9.6	Develop Public Participation and Involvement Plan
9.7	Document All Occurrences of Public Involvement

10	MCM 2 - Public Participation/Involvement
10.1	Develop Public Participation and Involvement Plan
10.2	Facilitate at Least One Opportunity Annually for Public Input on SWPPP
10.3	Provide Digital Copies of SWPPP Materials for Public Access
10.4	Document All Occurrences of Public Input on SWPPP
10.5	Document All Occurrences of Public Involvement

11	MCM 3 - Illicit Discharge Detection and Elimination (IDDE)
11.1	Develop an IDDE Plan
11.2	Incorporate Illicit Discharge Detection into All Inspection and Maintenance Activities
11.3	Develop Procedures for Detecting and Tracking IDDE
11.4	Develop Training Materials and Facilitate Staff Training
11.5	Identify Priority Areas with High Likelihood of Illicit Discharge
11.6	Develop Procedures for Timely Response
11.7	Train Office Staff to Receive Illicit Discharge Calls

12	MCM 4 - Construction Site Stormwater Runoff Control
12.1	Develop Site Plan Review Procedures
12.2	Develop Written Procedures for Public Input
12.3	Develop Procedures for Site Plan Inspections
12.4	Document All Site Plan Reviews
12.5	Document All Construction Site Inspections

13	MCM 5 - Post-Construction Stormwater Management
13.1	Develop Site Plan Review Procedures
13.2	Document All Site Plan Reviews

14	MCM 6 - Pollution Prevention; Good Housekeeping for Municipal Operations
14.1	Develop Facilities Inventory Map
14.2	Develop Maintenance Implementation Plan for All Public Facilities
14.3	Develop and Implement BMPs in Source Water Protection Areas
14.4	Review Pond Assessment Procedures and Schedule
14.5	Determine Best Approach to Pond Assessment and Implementation of Pond Cleaning
14.6	Perform Bathymetric Analysis of Ponds to Determine Sediment Accumulation
14.7	Calculate Pond TP and TSS Treatment Effectiveness
14.8	Facilitate Sediment Sampling on Highest Priority Ponds
14.9	Prioritize Pond Cleaning and Develop Estimates of Project Costs
14.10	Facilitate Maintenance of BMPs, as Needed
14.11	Train City Staff on Stormwater Management
14.12	Document all Inspections, Inventories and Training

15	Discharges to Impaired Waters
15.1	Develop MPCA MS4 Impaired Waters Spreadsheet
15.2	Identify Applicable Waste Load Allocations (WLA)
15.3	List BMPs Applicable to WLA and Identify Anticipated Pollutant Removals
15.4	Provide Narrative Describing any Adaptive Management Strategies

16	Alum or Ferric Chloride Phosphorus Treatment Systems
16.1	Identify any Alum or Ferric Chloride Systems
16.2	Monitor Operation of Facilities
16.3	Report and Document BMP Performance
16.4	Document Records of BMP Performance