

City of Grain Valley, MO MS4 Stormwater Management Plan

Permit Number MOR4C028

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SWMP INFORMATION

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Regulatory and Background Information:

The City of Grain Valley is an existing MS4 permittee. The existing Phase II permit was issued on December 1, 2021 and expires on September 30, 2026. Grain Valley is approximately 6.1 square miles and has a population according to the 2020 census of 15,627.

The City of Grain Valley owns and operates both the storm water system and the sanitary sewer collection system. However, the City of Blue Springs provides sewer treatment for Grain Valley at their Sni-A-Bar Wastewater Treatment Facility located on Seymore Drive.

There are five (5) major creeks flowing through the City. They include Tributary "A", Swiney Branch, Yennie Creek, Blue Branch and the Sni-A-Bar Creek Tributary. They drain the City into Sni-A-Bar Creek east of the City and ultimately to the Missouri River.

Information on ajacent waterways:

The permittee is within 100 feet of streams and lakes.

The permittee is not within 100 feet of waters classified as major resevoirs

The Permittee has some areas defined as wetlands as identified by the National Wetland Inventory Stormwater runoff from the City of Grain Valley does not discharge into a sinkhole

TMDL Information:

Not Applicable

Co-Permittee Information (3.2):

Not Applicable

Stormwater Program Review and BMP Iterative Process (3.3):

The City evaluates the Stormwater Management Program and all BMPs in the SWMP annually for effectiveness and to identify areas for improvement. The information collected is included in the City's annual report. The City may replace BMPs in the SWMP if they are found to be ineffective.

Minimum Control Measures

MCM 1. Public Education and Outreach of Stormwater Impacts

The permittee shall implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

- **4.1.A** Identify target audiences and explain why the target audiences are likely to have significant stormwater pollution impacts in the SWMP;
- **4.1.B** Identify target pollutants and/or sources of pollution that the permittee's education program is designed to address and how those pollutants/ sources relate to the specific target audience(s); and
- **4.1.C** Develop or utilize appropriate educational BMPs (materials, events, activities, etc.) to be used in conjunction with the target pollutants and target audiences. Explain opportunities about the BMPs and how the BMPs inform and educate target audiences to reduce pollutants in stormwater runoff.

Target	Explanation of why	Target	Sources of	Educational	Goal of BMP
Audiences:	audience was chosen:	Pollutants:	Pollution:	BMP(s)	
Developers and site contractors	Improperly managed land disturbance sites lead to sediment runoff, chemical/toxics spills, trash/waste/floatables leaving the site	Sediment/ Suspended Solids, chemicals/ toxics, floatables	Construction workers Failed Erosion Control measures Improperly serviced equipment	Handouts on proper site management given out during permitting Site management discussion before & during construction	Educate construction workers on the importance of proper installation of site BMPS and site management to reduce target pollutants in runoff.
Home Owners & Property Owners Associations	Improperly managed lawn care activities lead to over-application of fertilizers or weeding chemicals and improper disposal of leaf litter or grass clippings. Improperly managed BMPs lead to erosion and sediment	Fertilizers (nutrients), chemicals/ toxics, yard waste and sediment	Lawn care workers and maintenance personnel	1. Educational material provided to HOAs & POAs on proper yard care and waste disposal. 2. Education presentations at HOA meetings	Educate members of the HOA or POA on the importance of proper application of fertilizers and chemicals and proper disposal of yard waste to reduce target pollutants in runoff Educate HOA & POAs on proper BMP management and maintenance.
General Public	Improperly disposal of trash, yardwaste and other pollutants runoff with toxics, spills, trash, waste and floatables	Toxic chemicals (chlorine), waste oil, yard waste and floatables	Homeowners, renters, business owners	1. Link on City's webpage to MARC's website. 2. City's annual Community Development Event 3. City's annual City wide cleanup day 4. Participation in the annual Hazardous Waste program	Educate the general public about proper disposal of chemicals, Yardwaste and trash by widely advertising the events through the City's website, social media, press releases and brochures.

		sponsored by MARC	

MCM 2. Public Involvement/Participation in Program Development

The permittee shall implement a public involvement/participation program that reaches out and engages the public in the development and implementation of the permittee's Stormwater Management Program.

4.2.A The permittee shall hold a public notice period for a minimum of thirty (30) days on the draft SWMP. The permittee shall respond to public comments received during the public notice period. The permittee shall retain copies of any public comments and responses, for a minimum of three years.

The City utilizes a public notice period for 30 days on the draft SWMP each time significant revisions to the SWMP are made. The City advertises the public notice of the SWMP on the City's website under the stormwater webpage (include link here) with the disclaimer that the draft SWMP will be posted for review and public comment for 30 days. The City also advertises the public notice period in the local newspaper (include newspaper name here) under the announcements section. The advertisement in the local newspaper directs the readers to the website to review the draft SWMP. The City provides for public comment submission through the website as well as a mail-in option with the address posted on the website and in the local paper. The responds to all comments submitted by the public within 30 days of receipt and copies of all comments submitted by the public and the corresponding responses are retained by the City for at least 3 years.

The City held a public notice period for the draft SWMP March 24, 2022 – April 29, 2022. The City did not receive any comments from the public during the comment period.

4.2.B The permittee shall hold a public hearing regarding the proposed Stormwater Management Program and Plan within the MS4 service area. Public notice of the public hearing shall be given at least thirty (30) days before the hearing. Public notice of the hearing may be given at the same time as public notice of the draft SWMP and the two notices may be combined.

The City's policy is to hold a public hearing for the proposed SWMP. Public notice to announce the hearing will be posted on the City's website and in the City's local paper 30 days prior to the hearing. The hearing announcement will remain posted on the website the entire 30 days. The hearing announcement in the City's local paper will run in each issue until the hearing date is past.

The City held a public hearing for the proposed SWMP on April 18, 2022. The meeting agenda and summary notes are available to view on the City's website here (Meeting Agendas & Minutes - City of Grain Valley, Missouri).

4.2.C The permittee shall have a publicly available method to accept public inquiries or concerns, and to take information provided by the public about stormwater and stormwater related topics. This method, or a combination of methods, shall cover all MCMs.

The City's utilizes a web-based public comment submission platform located on the City's web page here (Report a Concern - City of Grain Valley, Missouri). Submissions are monitored by City staff daily. The City's policy is to respond to all comments/concerns/inquires within 30 days of receipt.

4.2.D If the permittee utilizes a stormwater management panel or committee, the permittee shall provide opportunities for citizen representatives on the panel or committee.

The City does not utilize a stormwater management panel or committee.

MCM 3. Illicit Discharge Detection and Elimination

The permittee shall implement and enforce a program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200 at 40 CFR 122.26(b)(2)) into the permittee's regulated MS4.

- **4.3.A** Develop, and maintain an up to date storm sewer system map, show the location of all outfalls, the names and location of all waters of the state that receive discharges from those outfalls, and the boundary of the regulated MS4 area.
 - 1. A description of the sources of information or procedures used for the map(s), how the permittee plans to verify the outfall locations with field surveys, and how the map will be regularly updated shall be included in the SWMP.
 - 2. The permittee shall make the map and any accompanying necessary information available to the Department upon request.

The City has a completed storm sewer system map. GIS is utilized to maintain and update the map as needed. The City can provide a large-scale master hard copy and utilizes field surveys and engineering plans to maintain and update the GIS as needed. The map is accessible to view upon request during audits of our MS4 program. All data on the map is retained on file for 5 years for investigation, research, and audit purposes.

4.3.B. To the extent allowable under state, or local law, through ordinance(s), or other regulatory mechanism(s), the permittee shall effectively prohibit, unauthorized non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions. Identify in the SWMP the regulatory mechanism(s) the permittee will use to effectively prohibit illicit discharges into the MS4 by including a link to or a copy of the relevant sections.

The City has a completed Illicit Discharge Section (705.020) in the Code of Ordinances. The ordinance is accessible on the City's website <u>City of Grain Valley, MO Generally (ecode360.com)</u>. The ordinance is reviewed annually and updates are made as needed.

- **4.3.C** Develop and implement a plan to detect and address unauthorized non-storm water discharges, including illegal dumping, to the system. An explanation of these strategies shall be included in the SWMP with:
 - 1. Applicable response timelines;
 - 2. Procedures for tracing the source of an illicit discharge, including specific techniques used to detect the location of the source;
 - 3. Procedures for removing the illicit discharge; and
 - 4. Other practices that are a part of this plan.

The City has an SOP in place for detecting and addressing unauthorized non-stormwater discharges, including illegal dumping, into the City's MS4. A copy of the SOP is attached to the SWMP as Appendix B. The SOP is reviewed annually and updates are made as needed.

4.3.D The permittee shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and the improper disposal of waste. The SWMP shall include a description of how this plan will coordinate with all other minimum control measures, monitoring, Integrated Planning (where applicable), and TMDL implementation (where applicable).

The City's plan for informing public employees, businesses and the general public of hazards associated with illegal discharges and the improper disposal of waste is:

- Public Employees will be informed through staff meetings as described in MCM6.
- The public will be informed through the education process described in MCM 1.
- Businesses will be informed through the processes described in MCM 1 and the City's permitting processes.
- Contractors, builders and developers will be informed through the permitting and plan review processes described in MCM 4.
- Developers, property owners, and homeowner /property owners associations will be informed through the processes described in MCM 1 and MCM 5.

The City does not use integrated planning.

4.3.E Implement a dry weather field screening strategy for unauthorized non-stormwater flows. The SWMP shall include a description of diagnostic monitoring procedures, including procedures for visual screening, sampling, or field analyzation and what parameters are sampled for to be used as indicators of discharge sources.

The City has an SOP in place for implementation of a dry weather field screening strategy for unauthorized non-stormwater flows. A copy of the SOP is attached to the SWMP as Appendix B. The SOP is reviewed annually and updates are made as needed. The plan is included with the Illicit Discharge SOP and the standard inspection report attached to the SOP. A map of the typical inspection points and all City discharge points is also attached to the SOP.

The City does not currently have the tools to perform in field analysis. Therefore, if needed a sample will be collected and tested for the suspect constituents as shown on the inspection form found in the Appendex with the SOP.

4.3.F Maintain and describe procedures to identify priority areas likely to have illicit discharges such as, but not limited to, any area where there is ongoing evidence of illicit discharges, or dumping; areas with higher likelihood of illicit connections such as neighborhoods with onsite sewage; or regions with a high percentage of directly connected impervious areas.

There are currently 8 areas within the City that the possibility of an illicit discharge is likely to be found due to the commercial and/or industrial nature of the development upstream of the discharge point. The areas listed below will be checked durning the City's "Routine Annual System Inspections" as described in the Illicit Discharge SOP found in Appendix B. Those areas include but not limited to:

- East Kansas City Industrial Park
- East Kansas City Industrial Park 16th Plat
- Valley Ridge Industrial Park
- Bush Business Park
- Interstate Business Development Park
- Price Chopper TIF
- James Rollo Business and Industrial Park
- Gate City Plaza

4.3.G Provide procedures to ensure the permittee's illicit discharge ordinance (or other regulatory mechanism) is implemented by means of appropriate enforcement procedures, including fines, and actions. A description of these enforcement procedures shall be included in the SWMP.

The City has a completed Illicit Discharge Ordinance which includes enforcement procedures in place. The ordinance is accessible on the City's website (<u>City of Grain Valley, MO Generally (ecode360.com</u>)). The ordinance is reviewed annually and updates are made as needed.

MCM 4. Construction Site Stormwater Runoff Control

The permittee shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

- **4.4.A** The permittee shall have an ordinance and/or other regulatory mechanism to require construction site operators to implement erosion and sediment control BMPs at construction/land disturbance sites.
 - 1. The ordinance or regulatory mechanism shall include sanctions which are designed to ensure compliance, to the extent allowable under state, or local law.
 - 2. The SWMP must contain a copy of or a link to the relevant ordinance or regulatory mechanism.

The City has a completed Land Disturbance Construction Ordinance in place. The ordinance is accessible on the City's website Section 501.060 (City of Grain Valley, MO Land Disturbance PermitSearch: Section 501.060 Responsibility of Permit Holder. (ecode360.com)). The ordinance is reviewed annually and updates are made as needed. The City utilizes the Mid America Regional Council's BMP manual and the Kansas City Chapter of APWA standards. The APWA standards are planned to be updated in the next two (2) years. The City also has in place a set of standard details to supplement the APWA's standards. The City's standard details are reviewed annually and updated as needed.

- **4.4.B** The permittee shall maintain requirements for construction site operators to:
 - 1. Implement appropriate erosion and sediment control best management practices; and
 - 2. Control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.

The City follows Chapter 501 of the Code of Ordinaces and the Grain Valley Standard Details (as amended) for construction site operators to ensure construction sites are managed appropriately. The City conducts weekly inspections for new homes and building sites and requires developers to provide weekly inspections for development sites for the life of the project. The City issues a construction permit that includes a requirement for construction site operators to develop and maintain a Stormwater Pollution Prevention Plan (SWPPP) for the site throughout the life of the project or active construction activity on the site. The City also requires that all projects with a disturbed area greater that one (1) acres get a Land Disturbance Permit from MDNR. For sites less than one (1) acre but exceeding 6,500 square feet requires a City land disturbance permit. The permit requires that the SWPPP for the site include details on appropriate installation, implementation, and maintenance of all BMPs used on the site for the life of the project, as well as details on controlling construction site waste, including, but not limited to discarded building materials, concrete truck washout, chemicals, trash/litter, and sanitary waste. The construction site permits are different for site and accessible on MDNR website. The standards for construction site permits are reviewed annually and updates are made as needed.

4.4.C The permittee shall maintain and apply procedures for review of all pre-construction site plans for consideration of potential water quality impacts.

The City has a permit process and requirement in place for all pre-construction site plans for consideration of potential water quality impacts. The City utilizes the standards from APWA Kansas City Section and the Grain Valley Standard Details. The City also utilizes the MARC BMP manual for design of water quality requirements. The APWA requirements are avaible on their website at the following link: The APWA procedures are currently under review with major changes expected within two (2) years. The City's standards are reviewed annually and updates are made as needed.

4.4.D The permittee shall maintain and apply mechanisms for receipt and consideration of information submitted by the public.

The City utilizes several methods for submission of concerns, complaints, or comments on any construction projects. An electronic submission system is located on the City's web page under Community Development or "Report a Concern" tab. The City also has in place for review and consideration of all environmental concerns, complaints, or comments received by the public including investigative response to submission, if deemed necessary. The City requires a follow up response to submitter if submitter requests to be contacted on the submission of completing review/consideration and/or investigation if necessary. Most responses occur within 24 to 48 hours.

- **4.4.E** The permittee shall maintain and apply procedures for site inspection and enforcement of control measures, this shall include prioritization of site inspection processes; AND
- **4.4.F** The permittee shall inspect (or require inspection of) any structure that functions to prevent pollution of stormwater or to remove pollutants from stormwater and ensure that all BMPs are implemented and effective. This shall include a monitoring plan and\or documentation with implementation schedules described in the SWMP.

The City utilizes an inspection report designed for site inspections and enforcement control measures. The City's inspection report, inspection schedule, site prioritization factors, BMP implementation and effectiveness evaluation, and follows the City's Land Disturbance and Sediment Control ordinance for enforcement control measures. A copy of the City's inspection report is attached to the SWMP as Appendix B. All active sites are reviewed at least once per week per the City's Code of Ordinances. If a problem exists a 48 hour warning is issued, the site is reviewed again after the warning period has elapsed. The project/property is then red tagged with a stop work order if it hasn't been corrected. Code allows the City to correct if the owner/developer/builder does not correct. The procedure is reviewed annually and updates are made as needed.

Post construction sites are reviewed annually unless a concern is reported or issues are noticed during regular inspections of nearby work or the site has been a problem before.

4.4.G The permittee shall maintain and apply a plan designed to ensure compliance with the permittee's erosion and sediment control regulatory mechanism, this shall include the sanctions and enforcement mechanisms to be used to ensure compliance.

The City's Land Disturbance and Sediment Control ordinance includes an enforcement process, which includes a warning, sanctions, fines, and progressive enforcement actions, to ensure compliance. The ordinance is accessible on the City's website Chapter 501(City of Grain Valley, MO Land Disturbance

<u>Permit (ecode360.com)</u>). The enforcement process is reviewed annually along with the rest of the ordinance and updates are made as needed.

MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment

The permittee shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that would disturb one acre or more, and that discharge into the permittee's regulated MS4.

- **4.5.A** The permittee shall develop, and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for the community, including, but not limited to the assessment of site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance. The goal of this approach is to arrive at designs that protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions.
 - 1. Details of these strategies to minimize water quality impacts shall be included in the SWMP.
 - 2. The SWMP shall include a link to or copy of standards developed or adopted.

The City, by ordinance, utilizes APWA Kansas City Chapter requirements to protect sensitive areas, minimize the creation of stormwater pollution, and utilizes MARC's BMP requirements to effectively remove stormwater pollution, and attempt to reduce predevelopment runoff conditions. The ordinance is accessible on the City's website Sections 405.040, 405.050 and 405.060 (City of Grain Valley, MO Subdivision Regulations (ecode360.com)). The ordinance is reviewed annually and updates are made as needed.

4.5.B To the extent allowable under state, or local law, through ordinance, or other regulatory mechanism, the permittee's Stormwater Management Program shall address post-construction runoff from new development and redevelopment projects. The regulatory mechanism the permittee will use shall be identified in the SWMP by including a link to or a copy of the ordinance(s) or regulatory mechanism(s). If the permittee needs to develop a mechanism, the schedule for implementation shall be described in the SWMP.

The City has a completed Post-Construction Ordinance in place Section 501.200. The ordinance is not yet accessible on the website, under code of ordinances, but on the left hand side, click on New Laws, for the ordinances pertaining to Chapters 4.5, 501, and 705 are list. The ordinance is reviewed annually and updates are made as needed.

- **4.5.C** The permittee shall maintain a plan to ensure adequate long-term operation and maintenance of Post-Construction BMPs, both structural and non-structural. Descriptions of and/or examples of agreements between the permittee and other parties such as post-development landowners or regional authorities shall be included in the SWMP.
- **4.5.D** The permittee shall maintain and apply an inspection plan with implementation schedules for post-construction BMPs.

4.5.E The permittee shall inspect or require the inspection of post-construction stormwater BMPs to ensure all BMPs are implemented and effective.

The City's Post-Construction ordinance includes requirements for the long-term maintenance of Post-Construction BMPs in Section 501.200 A. The City inspection plan (per the City's Dry Weather Screening) includes annual inspection of BMPs to ensure all BMPs are implemented, maintained and effective. The SOP that includes this plan is found in Appendix B. The enforcement process is reviewed annually along with the rest of the ordinance and updates are made as needed.

MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

The permittee shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

- **4.6.A** An employee training program for municipal operations staff who work with material handling, at municipal vehicle or equipment maintenance areas, storage yards, and material storage facilities. The training shall be used to prevent and reduce stormwater pollution from activities such as, but not limited to, park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. The SWMP shall include:
 - 1. A description of any existing, available training material the permittee plans to use such as those available from EPA, the state, or other organizations. Include the frequency of training and topics covered
 - 2. A description of how this training will coordinate with all other MCMs.
 - 3. A description of how this training will coordinate with monitoring, integrated planning, and TMDL implementations where applicable.

The City has a training program for all municipal operations staff. The City utilizes MARC training materials on proper management of municipal vehicle and equipment maintenance areas and storage yards; proper land disturbance site management; long-term BMP maintenance; and proper material handling at storage facilities. Trainings are conducted for each new hire, and annual refreshers for each applicable department. If an employee misses their annual training, a make-up training date is scheduled.

The City's training program coordinates with all other MCMs as follows:

- MCM #1 by providing education/training to municipal staff; this in itself satisfies how the training program coordinates with MCM #1;
- MCM #2 by municipal staff participating in the training, this satisfies MCM#2;
- MCM #3 teaching staff how to recognize, address, and prevent illicit discharges;
- MCM #4 educating inspection staff on proper land disturbance site management;
- MCM #5 educating inspection staff on the importance of post-construction BMPs and long-term maintenance of the BMPs; and
- MCM #6 educating/training municipal staff on good housekeeping practices at municipal facilities

Monitoring, integrated planning, or TMDL implementations are not applicable. The City's training program is reviewed annually and modified as new, updated material becomes available or as the needs of the City change.

4.6.B The permittee shall maintain an updated list of all municipal operations/facilities that are impacted by this operation and maintenance program.

The City has three City-owned and operated municipal facilities impacted by the City's operation and maintenance program. The facility's include:

Public Works operation, vehicle maintenance, salt storage and fueling site – 405 James Rollo Drive Municipal Parks Maintenance Facilty – 600 SW Buckner Tarsney Road Municipal Pool – 713 S Main Street

The City's list of facilities is reviewed annually and updated as needed.

4.6.C The permittee shall maintain an updated list of industrial facilities that the permittee owns or operates that are subject to NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the permittee's MS4. The permittee shall include the permit number or a copy of the No Exposure Exemption Certification (if applicable) for each facility in the SWMP. NPDES permitted facilities not owned or operated by the permittee are not required to be part of the list, however the permittee should be familiar with all such facilities in their MS4 service area as they may signify a priority area for the IDDE (MCM #3) program.

The City does not have any owned and operated "No Exposure" facilities. The City's list of facilities is reviewed annually and updated as needed.

4.6.D The permittee shall develop or maintain controls for reducing or eliminating the discharge of floatables and pollutants from municipal parking lots, maintenance and storage yards, waste transfer station, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas owned or operated by the permittee, or other locations expected to contribute floatables and/or pollutants.

- All of the City's vehicle maintenance, washing and salt storage are contained under cover in enclosed structures.
- Inlets on all City streets and parking lots have trash racks.
- City Streets and drives are sweep twice per year. More frequently in the business disctricts.
- Fueling facilities are leased, above tanks fully contained and maintained by the contractor.
- Recycle waste oil and other fluids are disposed through a commercial pickup service.
- The City keeps and updates maintenance schedules for all City vehicles and equipment.
- The City's municipal pool is drained and discharges to the sanitary sewer.

4.6.E The permittee shall maintain and apply maintenance procedures, maintenance schedules, and long-term inspection schedules for controls to reduce floatables and other pollutants to the permittee's regulated MS4.

The City has crews commonly in the field doing activities with storm features. When conducting such activities crews inspect the storm drains and storm structures. The City owns a pipe camera and has the ability to inspect pipes for illegal connections that could contribute pollutants. If found violations are corrected immediately. Crews also observe activities during construction to insure no contractor is contributing to pollutants in the storm water. These are routine and reoccurring in the daily schedules.

4.6.F The permittee shall utilize procedures for the proper disposal of waste removed from the separate storm sewers and areas of jurisdiction, including dredged material, accumulated sediments, floatables and other debris.

All debris, waste, and floatables removed from the City's inlets, maintenance facilities and street sweeping operations are collected at the Public Works facility and hauled to the landfill for disposal. All liquid waste collected at the City facilities such as waste oil and other fluids are disposed through a commercial pickup service.

- **4.6.G** The permittee shall utilize procedures for the washing of municipal vehicles and equipment.
 - 1. Use of any soap or detergent shall only be where there is connection to sanitary sewer or equivalent; and
 - 2. Any wash water that contains pollutants such as salt, oils, grease, sediment, grass clippings, lawn chemicals, or pesticides shall not be discharged to waters of the state or the MS4 system without appropriate treatment to ensure the discharged effluent is in compliance with Missouri Water Quality Standards.

Currently the City uses a third party professional truck wash when washing trucks and equipment at the end of the winter season and salt operations. If the City does wash vehicles on site the wash bay has a drainage trough that is directly connected the sanitary sewer to properly dispose of soaps and detergents used.

- **4.6.H** All paints, solvents, petroleum products and petroleum waste products (except fuels) under the control of the permittee shall be stored so that these materials are not exposed to stormwater.
 - 1. Sufficient practices of spill prevention, control, and/or management shall be provided to prevent any spill of these pollutants from entering waters of the state.
 - 2. Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater.

The City stores all paints and chemicals in a purpose built storage cabinet and is inside a building with a containment basin built in. All large containers are stored in a storage building. The large containers are on a skid that acts as a containment basin if there would be a leak from a container. The City's petroleum is stored in a container and also has a containment basin constructed around it and is maintained by the City's third party fuel vendor. When the City needs to dispose of items: Grain Valley is part of the MARC hazardous waste program and pays annually for disposal of hazardous materials.

4.6.I If the permittee has new flood management projects (projects developed or designed to reduce flooding), the permittee shall utilize procedures to assess all flood management projects for impacts of water quality, incorporating water quality protection devices or practices.

The City of Grain Valley does not not have any flood management projects under consideration, design or construction at this time. The last flood control project developed by the City was the retention pond in Butterfly Park. The City is currently preparing an update to the Stormwater Master Plan. Upon completion, Projects could be developed in the future. All such projects shall be assessed for impacts to water quality and to reduce peak discharge. All such projects shall incorporate water quality protection devices and/or practices.

APPENDICES

APPENDIX A

Measurable Goals Spreadsheet

APPENDIX B