City of Dardenne Prairie, Missouri

MS4 Stormwater Management Plan

Permit No. MOR04C067

2026 Renewal Public Review Draft

Prepared May 2026 | Renewal submittal target: August 1, 2026
Originally adopted March 2, 2022 by the Board of Aldermen

PUBLIC REVIEW DRAFT | MOR04C COMPREHENSIVE MS4 GENERAL PERMIT RENEWAL

Permittee / Continuing Authority	City of Dardenne Prairie, Missouri
Primary MS4 Contact	Matthew Davidson, City Engineer
Administrative Coordination	Kyle Michel, City Administrator
Document Purpose	Public review draft prepared to support the 2026 renewal package.
Final Record	Certification/adoption record to be completed after public review and comment response.
Report Organization	Six Minimum Control Measures, appendices, tracking fields, and final certification page.

SWMP Information Page

Contact Information

Role	Information
Permittee / Continuing Authority	City of Dardenne Prairie, Missouri, 2032 Hanley Road, Dardenne Prairie, MO 63368
Primary MS4 Contact and Primary Person Responsible for all MCMs	Matthew Davidson, City Engineer, Phone: (636) 561-1718, Email: cityengineer@dardenneprairie.org
Administrative / Authorized Representative Coordination	Kyle Michel, City Administrator, City of Dardenne Prairie
Stormwater Webpage / Public Reporting Method	City stormwater information webpage and public inquiry/concern form: https://www.dardenneprairie.org/engineering/StormwaterInformation.php

Regulatory and Background Information

The City of Dardenne Prairie first obtained MS4 permit coverage in 2003. The City operates a regulated small municipal separate storm sewer system (MS4) within the St. Louis metropolitan area and is renewing coverage under the MOR04C Comprehensive MS4 General Permit. The current permit number is MOR04C067. The current permit is scheduled to expire September 30, 2026. This SWMP update has been prepared to support renewal coverage and to strengthen the City's program documentation before the July 1, 2026 renewal submittal target.

Before final submittal, the City will re-check Missouri DNR's final reissued MOR04C permit, current application forms, and any renewal instructions. If the final permit or forms differ from this draft, the City will make the necessary revisions and retain the final permit/form check in the renewal file.

Final permit/forms verification record: Before renewal submittal, the City will retain a short checklist or memo documenting the MOR04C permit version reviewed, the date Form M and Form K were downloaded/verified, the application submission method confirmed with Missouri DNR, and whether any final revisions were made after the public review period.

Document Control, Responsibilities, and Recordkeeping

The City shall maintain this SWMP as a controlled document. The Primary MS4 Contact shall maintain the official SWMP file, version history, revision date, revision summary, current contacts, permit/forms verification memo, appendix index, and public review/final adoption records. Superseded versions shall be retained in the MS4 compliance file.

The City assigns implementation responsibility by BMP and MCM as identified in Appendix A. The Primary MS4 Contact is responsible for overall program coordination, while BMP-specific implementation may be assigned to the City Engineer, City Administrator, Public Works/Municipal Operations Staff, Parks/Grounds Staff, Administrative Support/Communications, and consultant support where used.

The City shall provide an annual Board of Aldermen update summarizing SWMP implementation status, measurable goals achieved, public comments/concerns, complaint and case trends, inspection and enforcement activity, identified program gaps, and proposed BMP changes for the upcoming reporting year.

All SWMP implementation records shall be maintained in accordance with applicable permit record-retention requirements and organized so that they can be produced promptly to Missouri DNR upon request. Records may be maintained electronically if they are organized, backed up consistent with City procedures, and readily retrievable by MCM, BMP, reporting year, project, outfall, case, or facility.

Before final renewal submittal and again before final adoption after reissuance of MOR04C, the City shall confirm that this SWMP remains consistent with the final issued permit and shall revise section references, deadlines, forms, and supporting records as needed.

Role	Primary SWMP responsibilities	Key records / outputs
City Engineer / Primary MS4 Contact	Overall SWMP coordination; renewal package support; MCM implementation oversight; engineering review; map/outfall, construction, post-construction, and IDDE program coordination.	SWMP version file; permit/forms verification memo; annual review notes; construction, post-construction, IDDE, and map records.
City Administrator / Authorized Representative Coordination	Administrative oversight, final coordination, Board of Aldermen agenda/support, and authorized representative coordination for certification/adoption as applicable.	Board update materials; final certification/adoption record; administrative correspondence.
Public Works / Municipal Operations Staff	Municipal facility good housekeeping, facility inspections, spill/illicit discharge reporting, corrective actions, training participation, and maintenance support.	Training records; facility inspection checklists; spill/leak records; work orders; waste/removal records.
Administrative Support / Communications	Website posting, public notice support, public comment intake, outreach archiving, meeting records, and public concern log support as assigned.	Website screenshots; social media/electronic outreach records; comment log; meeting records; public concern log.
Parks / Grounds Staff	Park/greenway housekeeping, cleanup/event support, tree planting/habitat activities, litter/debris reporting, and park facility observations as assigned.	Event records; facility inspection notes; work orders; photos; cleanup/tree planting documentation.
Consultant support where used	Engineering/GIS, stormwater inspection, sampling, mapping, document preparation, or technical support when assigned by the City.	Consultant reports, maps, inspection/sampling forms, technical memoranda, or other deliverables.

TMDL Information

Not applicable based on current City MS4 program records. If a TMDL becomes applicable during the permit term, the SWMP and annual reporting procedures will be updated accordingly.

Co-Permittee Information

Not applicable. The City is not filing as a co-permittee for this renewal.

Stormwater Program Review and BMP Iterative Process

The City evaluates the Stormwater Management Program and all BMPs in the SWMP at least annually for effectiveness, completeness, and opportunities for improvement. The annual review includes the implementation records, measurable goals, public comments/concerns, inspection data, enforcement actions, staff training, and changes in City operations or development activity. Results of the annual review are used to prepare the annual MS4 report and to modify BMPs where needed.

For the 2026 renewal, the City has reviewed and updated contact information, public participation procedures, MCM tracking metrics, IDDE procedures, construction and post-construction tracking fields, municipal facility information, and appendix forms. This update is intended to address renewal completeness and to create auditable records for future annual reports.

2026 Renewal Public Participation Record

The City will make this draft SWMP available for public review for at least thirty (30) days before finalizing the renewal package. Public comments will be logged, reviewed, answered, and retained with website posting screenshots, notice proof, meeting records if any, and final governing-body action if applicable. The final SWMP will include or reference the completed public review record.

Public participation record item	Documentation to retain in renewal file	Final status
Draft SWMP public notice	Copy of notice text, posting location, posting date, screenshot, and newspaper affidavit if used	To be completed after posting
Public comment period	Start date, end date, website screenshots, and proof the draft remained available	To be completed after posting
Comments received	Comment log showing commenter, date received, topic, assigned reviewer, and response date	To be completed after comment period
Responses to comments	Written responses or summary response memorandum retained with the SWMP file	To be completed after comment review
Public information meeting / public hearing / Board update	Agenda, minutes, staff memo, sign-in sheet/attendance, presentation, notice proof, public comments, and Board action/reference if required or used.	To be completed before final SWMP adoption as applicable to final MOR04C renewal instructions and City procedure
Final adoption/certification	Responsible official signature, title, date, and Board action/reference if applicable	To be completed in final SWMP

Overview of Minimum Control Measures

The City's Stormwater Management Program includes the six required minimum control measures (MCMs) to reduce pollutants in stormwater discharges to the maximum extent practicable and to protect waters of the state.

- MCM 1. Public Education and Outreach of Stormwater Impacts
- MCM 2. Public Involvement/Participation in Program Development
- MCM 3. Illicit Discharge Detection and Elimination
- MCM 4. Construction Site Stormwater Runoff Control
- MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment
- MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

Permit section / requirement area	SWMP location	Primary implementation records
Part 3 / Section 3.1.B - Contact information and SWMP description	SWMP Information Page; Contact Information; Document Control	Contact sheet, official SWMP file, version history, permit/forms verification memo
Section 3.2 - Sharing responsibility / co-permittee status	Co-Permittee Information	Co-permittee determination and any intergovernmental agreements if applicable
Section 3.3 - Stormwater program review and BMP iterative process	Stormwater Program Review and BMP Iterative Process; Appendix A	Annual BMP review, adaptive-management memo, annual Board update, annual report support records
Section 4.1 - MCM 1 Public Education and Outreach	MCM 1; Appendix A	Education materials, screenshots, social media/electronic outreach records, pre-construction education records
Section 4.2 - MCM 2 Public Involvement/Participation	MCM 2; Appendix D	Public notice proof, comment log, meeting/Board records, public involvement activity records
Section 4.3 - MCM 3 Illicit Discharge Detection and Elimination	MCM 3; Appendix B; Appendix A	MS4 map, outfall inventory, priority area list, dry-weather screening forms, IDDE case log
Section 4.4 - MCM 4 Construction Site Stormwater Runoff Control	MCM 4; Appendix E	Construction inventory, SWPPP/site-plan review records, inspections, enforcement ladder records
Section 4.5 - MCM 5 Post-Construction Stormwater Management	MCM 5; Appendix E	Post-construction BMP inventory, O&M records, owner reports, inspections, deficiency/enforcement closeout
Section 4.6 - MCM 6 Pollution Prevention/Good Housekeeping	MCM 6; Appendix C	Municipal facility inventory, training records, inspection checklists, spill/waste records, corrective actions
Part 5 - Monitoring, recordkeeping, and reporting	Appendices A-E; annual report support file	Annual report documentation, monitoring/sampling records if any, record-retention file

This SWMP is organized to follow the current MOR04C Comprehensive MS4 General Permit framework. The City uses the permit section references in the table above as a review crosswalk rather than repeating the full permit text in the SWMP. If Missouri DNR issues revised MOR04C section numbering before final renewal submittal, the City will update this crosswalk as part of the final permit/forms verification record.

MCM 1. Public Education and Outreach of Stormwater Impacts

The City implements a public education program to distribute educational materials and conduct equivalent outreach activities about stormwater impacts and the actions the public can take to reduce pollutants in stormwater runoff. The program identifies target audiences, target pollutants/sources, educational BMPs, measurable goals, and tracking methods.

Target Audiences, Pollutants, and Educational BMPs

BMP	Target audience	Target pollutants / sources	Measurable goal and intended outcome	Tracking records
MCM 1 BMP #1: Stormwater webpage and online reporting form	General public, residents, business owners, property owners, developers, and contractors	Nutrients, sanitary sewage, petroleum/oil/grease, household hazardous waste, trash, bacteria, chlorine, sediment, pet waste, and yard waste from residential, commercial, construction, and municipal sources	Maintain a comprehensive stormwater webpage with educational materials, SWMP access, and reporting/comment methods. Provide the public with clear steps for preventing pollutant discharge to the MS4.	Annual screenshot, webpage URL, update date, list of topics/pollutants covered, inquiries/comments received, and response records
MCM 1 BMP #2: Social media or electronic outreach campaign	General public and residents	Nutrients, pet waste, yard waste, trash, bacteria, chlorine, salt/deicer, and household wastes from residential and public areas	Publish stormwater education posts or electronic messages during the year, with topics matched to seasonal pollutant risks.	Post date, topic, pollutant/source addressed, screenshot or archive, reach/engagement if available, and annual evaluation
MCM 1 BMP #3: Pre-construction conferences and contractor/developer education	Developers, contractors, builders, site supervisors, and design professionals	Sediment, suspended solids, concrete washout, fuels, chemicals, construction trash, sanitary waste, dewatering discharge, and disturbed-soil runoff	Hold pre-construction conferences for applicable permitted land disturbance activities and communicate erosion, sediment, waste-control, inspection, and enforcement expectations.	Land disturbance permit list, conference date, agenda/checklist, sign-in sheet, SWPPP review record, and follow-up correspondence
MCM 1 BMP #4: Annual stormwater fact sheet/newsletter/permit-counter education	Residents, property owners, business owners, HOAs, contractors, and permit applicants	Pet waste, yard waste/leaves, fertilizer/nutrients, illicit discharges, household waste, oil/grease, sediment, trash, salt/deicer, and floatables	Distribute or post at least one annual stormwater fact sheet, newsletter item, utility insert, permit-counter handout, or equivalent targeted educational item. Use this BMP to provide a plain-language SWMP overview and seasonal pollution-prevention guidance.	Copy of material, date posted/distributed, distribution method, target audience, pollutant/source addressed, estimated reach or location of distribution, and annual review notes

MCM 1 Measurable Goals and Annual Evaluation

BMP	Annual measurable goal	Minimum records to keep	Evaluation method
Webpage/reporting form	Maintain a current stormwater webpage; update educational materials at least annually and whenever the SWMP is revised; track page views/hits if website analytics are available. If analytics are unavailable, document that limitation and retain screenshots/update logs.	Screenshots, URL, date of review/update, list of pollutants/topics, page views/hits if available, public inquiries/comments and responses, and notation if analytics are unavailable.	Confirm webpage is active, information is current, and inquiries/comments were tracked and answered.

BMP	Annual measurable goal	Minimum records to keep	Evaluation method
Social media/electronic outreach	Publish at least four (4) stormwater education posts or electronic messages per year, with topics matched to seasonal risks and target pollutants.	Screenshots, post/message dates, topic, pollutant/source, target audience, and reach/impressions/interactions if available.	Review the number of posts/messages, topics covered, and reach/impression/interaction data if available. Modify topics or frequency if records show low coverage or engagement.
Pre-construction conferences	Hold a pre-construction conference or equivalent documented kickoff for each applicable City land disturbance permit where construction is authorized to begin.	Permit list, meeting checklist, attendance/sign-in, SWPPP review notes, corrective requirements.	Compare number of applicable permits to documented conferences/kickoffs. Identify gaps and corrective actions.
Annual fact sheet/newsletter/permit-counter education	Distribute or post at least one (1) targeted annual stormwater educational item, such as a fact sheet, newsletter item, utility insert, permit-counter handout, or equivalent City-approved outreach material.	Copy of material, date, distribution/posting method, target audience, pollutant/source addressed, and estimated reach or location made available.	Confirm material was distributed/posted and addressed target pollutants/sources; adjust annual topic as needed.

MCM 2. Public Involvement/Participation in Program Development

The City implements a public involvement/participation program to engage the public in SWMP development, renewal review, implementation, and reporting of stormwater concerns. The City will over-document the 2026 renewal public participation process because public notice and public meeting records are a high-risk renewal item.

BMP / Permit element	City implementation	Measurable goal	Records retained
Public notice period for draft SWMP	Post the draft SWMP and public notice on the City stormwater webpage for at least thirty (30) days for renewal or significant SWMP revision. Newspaper notice or other City notice method may be used if required or selected.	Complete and document the notice period before finalizing the renewal package.	Notice text, posting date, end date, screenshots, affidavit if used, and final posting proof.
Public comments and responses	Accept comments through the website, email/mail if listed in the notice, or other identified method. Review and respond to comments within 30 days of receipt where a response is required or requested.	Track 100% of comments received and responses issued.	Comment log, comment copies, response dates, response memorandum, and final SWMP changes made.

BMP / Permit element	City implementation	Measurable goal	Records retained
Public information meeting / governing-body update	The City will conduct the public notice and public information meeting process required by the applicable MOR04C renewal instructions. If the reissued permit retains the current MOR04C public meeting requirement, the City will advertise and hold a public information meeting at least thirty (30) days after notice, within the MS4 service area, and retain the agenda, notice proof, attendance, minutes, presentation, and public comments. The City shall also provide an annual Board of Aldermen update summarizing SWMP implementation status, measurable goals achieved, public comments/concerns, complaint and case trends, inspection and enforcement activity, identified program gaps, and proposed BMP changes for the upcoming reporting year.	Document any required public information meeting and provide one formal Board of Aldermen update each reporting year.	Notice proof, agenda, minutes, staff memo, presentation, sign-in/attendance, public comments, Board agenda/minutes, Board update materials, and Board action/reference if applicable.
Public inquiry/concern reporting method	Maintain a publicly available method to receive stormwater inquiries, concerns, and illicit discharge or construction-site complaints covering all MCMs.	Maintain the reporting method continuously and review submissions at least annually.	Submission log, inspection/referral records, response records, closeout notes.
Stormwater management panel/committee evaluation	The City does not currently utilize a stormwater management panel or committee. The City will annually evaluate whether a panel/committee would provide meaningful benefits based on public comments, development activity, and staffing/resources.	Document the annual evaluation and decision.	Annual review note or staff memorandum.

Public Involvement BMPs for Permit Cycle

In addition to the renewal public notice/comment process and the public reporting method, the City will implement or support hands-on public involvement BMPs during the permit cycle. These BMPs are intended to engage residents, HOAs, businesses, youth/community groups, and other stakeholders in stormwater protection, cleanup, habitat improvement, and program awareness.

Involvement BMP	Target participants	Implementation approach	Tracking fields	Annual evaluation
Watershed / stream / litter cleanup support	Residents, volunteers, community groups, HOAs, businesses, and City staff	Support, promote, participate in, or document cleanup activities such as stream/litter cleanup, watershed cleanup, park cleanup, or equivalent public cleanup activity within or benefiting the MS4 service area.	Date, location, organizer, City support provided, attendees/interactions, amount of trash/debris removed if available, photos, sign-in sheets, and disposal/cleanup notes.	Review participation and results annually; identify whether additional promotion, locations, or partnerships are needed.
Tree planting, habitat improvement, stormwater booth, or HOA/public stormwater training	Residents, HOAs, property owners, youth/community groups, developers/contractors, and the general public	Support or conduct an Arbor Day/tree planting, habitat improvement activity, Prairie Day or similar stormwater education booth, HOA/public stormwater training, or equivalent public involvement event.	Date, location, event type, organizer, City support provided, number of attendees/interactions, number of trees planted or materials distributed if applicable, photos, sign-in sheets, and educational topics.	Review whether the activity reached the intended audience and whether the activity should be repeated, modified, or replaced in the next reporting year.

The City may substitute an equivalent public involvement BMP if the selected activity is not available in a given year, provided the substitute BMP is documented, evaluated, and retained with annual MS4 records.

MCM 3. Illicit Discharge Detection and Elimination

The City implements and enforces a program to detect and eliminate illicit discharges into the regulated MS4. The program includes a current storm sewer system map, an illicit discharge ordinance, dry-weather field screening, priority-area review, response procedures, enforcement procedures, training/outreach, and tracking records.

Legal authority: The City uses Ordinance No. 1635 as its illicit discharge and stormwater enforcement authority, including authority for inspections, notices of violation, required corrective action, BMP implementation, sampling/reporting where needed, and other enforcement remedies available under City code and permit procedures.

Storm Sewer System Map and Outfall Inventory

The City maintains an electronic MS4 map showing the regulated MS4 boundary, known storm sewer infrastructure, all mapped outfalls, and receiving waters. The map is updated at least annually and whenever additions, removals, corrections, annexations, or field-verified changes are identified. The map and supporting information are available to Missouri DNR upon request.

For the 2026 permit cycle, dry-weather screening and illicit discharge inspections will be scheduled based on all mapped MS4 outfalls, not only the representative outfalls listed in the permit application. The City will inspect at least sixty percent (60%) of all mapped MS4 outfalls during each five-year permit cycle, with priority areas inspected more frequently when warranted by complaints, field indicators, land use, or past findings.

Priority Areas

The City will review priority areas at least annually. Priority areas may include commercial corridors, industrial/commercial land uses, businesses with target pollutant potential, prior complaint or spill locations, high impervious areas, construction/redevelopment areas, older infrastructure areas, City facilities, detention/retention facilities with repeated concerns, and any area where field screening identifies ongoing evidence of illicit discharge or dumping.

Initial 2026 Priority Area List

The following initial priority areas will be used for the 2026 renewal cycle and updated annually based on complaints, inspection results, land use changes, new infrastructure, and dry-weather screening findings.

Priority area	Reason selected	Target pollutants / sources	Inspection / screening focus	Annual review notes
Commercial corridors and high-impervious commercial areas	Higher vehicle traffic, parking areas, loading areas, and business activity create elevated potential for pollutant exposure.	Petroleum, oils/grease, metals, trash/floatables, sediment, nutrients, wash water.	Prioritize nearby outfalls during dry-weather screening; follow up on complaints and observations.	Update based on findings, complaints, redevelopment, or new business activities.
Active construction and redevelopment areas	Disturbed soil and construction activities create higher runoff and illicit discharge potential.	Sediment, concrete washout, fuels, chemicals, dewatering discharges, trash, sanitary waste.	Coordinate with MCM 4 construction inspections and investigate downstream impacts or complaints.	Update as active sites open/close and as priority status changes.
City facilities, including the Maintenance Shed	Municipal operations may include material storage, vehicles/equipment, waste handling, and deicer or petroleum-related activities.	Sediment, petroleum, metals, deicer residue, trash/floatables, chemicals.	Annual facility inspection, routine good housekeeping, and responsive IDDE checks when indicators are observed.	Update based on facility changes, spills, or inspection findings.

Priority area	Reason selected	Target pollutants / sources	Inspection / screening focus	Annual review notes
Prior complaint or concern locations	Historic complaints or public concerns indicate potential recurring pollutant sources or vulnerable drainage areas.	Pollutants vary by complaint; may include sewage, wash water, oil, trash, sediment, or yard waste.	Track complaint location, inspect, source trace when needed, and close out or escalate.	Review complaint log annually to add/remove priority locations.
Detention/retention facilities with repeated concerns	Maintenance deficiencies can contribute sediment, floatables, nutrients, algae, or downstream impacts.	Sediment, floatables, nutrients, trash, algae, eroded materials.	Coordinate with MCM 5 inventory and inspection tracking; follow up on owner/operator deficiencies.	Update based on inspection outcomes and unresolved maintenance issues.
Mapped outfalls with past dry-weather flow, staining, deposits, odor, or sheen	Field indicators can identify illicit discharge or non-stormwater sources requiring follow-up.	Unknown/variable; potential sewage, wash water, petroleum, chemicals, nutrients, sediment.	Re-screen, source trace, sample or test if needed, and document closure.	Retain findings and adjust screening priority during annual IDDE review.

Dry-Weather Field Screening and IDDE SOP

Step	Procedure	Record created
1. Schedule and conditions	Conduct dry-weather field screening a minimum of seventy-two (72) hours after the last precipitation event, unless field conditions require documentation of an alternate condition. Record date, time, weather, antecedent rainfall estimate/source, outfall condition, and inspector.	Dry-weather field screening form
2. Visual observations	Observe for flow, odor, color, turbidity, floatables, staining, deposits, algae/slime, sheens, sewage indicators, excessive sediment, trash, or other unusual conditions.	Inspection checklist and photos where useful
3. Field indicators or sampling	Where flow or suspicious indicators are present, document field indicators and use field screening parameters, field test kits, consultant support, or laboratory sampling as needed to evaluate the discharge. The City will maintain access to field screening equipment or a contract/lab option for diagnostic monitoring when suspicious flow is present. Diagnostic monitoring parameters may include pH, oil and grease, E. coli or fecal coliform, surfactants or fluorescence concentration, specific conductivity, ammonia, chlorine, dissolved oxygen, fluoride/hardness, or other parameters selected based on the suspected source.	Field parameter notes, sampling/test records, equipment/contract/lab documentation, or decision note explaining why sampling was not needed
4. Source tracing	Trace suspected discharge upstream using visual survey, storm map review, manhole/inlet checks, facility/property contact, dye/smoke testing where appropriate, or referral to the appropriate utility/agency.	Investigation log and source tracing notes
5. Response and enforcement	If an illicit discharge is confirmed or suspected, notify the responsible party where known, require correction, use ordinance enforcement authority as needed, and escalate unresolved violations through notices, reinspection, fines, or other available remedies. After the source is identified, the City will require the pollutant source to be removed or controlled. Corrective actions may include source control, treatment BMPs, cleanup, remediation or restoration of affected property, referral to the appropriate utility or agency, and use of City enforcement authority where necessary. The City will maintain contact information for appropriate utility, agency, contractor, laboratory, or environmental cleanup support as needed.	Notice/correspondence, enforcement record, reinspection notes
6. Closeout and annual review	Close the case when the discharge is eliminated, referred, or otherwise resolved. Evaluate the finding during annual IDDE program review and update priority areas if needed.	Closure documentation and annual review update

IDDE Response Timelines

The City will immediately respond to illicit discharges, spills, or other conditions that are determined to constitute a threat to human health, welfare, or the environment. For complaints, reports, dry-weather screening findings, or monitoring information indicating a potential illicit discharge that does not constitute an immediate threat, the City will investigate or refer the matter to the appropriate agency within five (5) business days on average. If an illicit discharge is observed that is related to, discharging to, or discharging from an adjacent MS4 operator's storm sewer system, the City will notify the adjacent MS4 operator within twenty-four (24) hours of discovery or as soon as practicable. Response, referral, enforcement, and closeout records will be retained in the centralized IDDE case log.

Centralized IDDE Case Tracking

The City will maintain a centralized IDDE case log for credible complaints, dry-weather screening findings, suspicious flows, spills, dumping concerns, and related investigations. Each case should receive a unique IDDE case ID and should be tracked from intake through investigation, corrective action, enforcement if needed, and closeout. The log should include the case ID, date received/identified, location or outfall ID, weather condition, field indicators, source-tracing steps, diagnostic monitoring or sampling status, responsible party if known, notices or enforcement actions, closure date, and annual priority-area implications.

MCM 3 Measurable Goals

Goal	Tracking mechanism
Maintain and update the MS4 map and outfall inventory at least annually.	Electronic map update log, map screenshots/exports, and outfall change record.
Inspect at least 60% of all mapped MS4 outfalls during the five-year permit cycle.	Outfall inspection schedule and completed inspection forms by outfall ID.
Review priority areas annually and update based on complaints, findings, land use, or new infrastructure.	Priority area list/map and annual review notes.
Track all illicit discharge complaints, investigations, responses, enforcement, and closeout actions.	IDDE complaint/investigation log and case file.
Provide illicit discharge recognition/prevention information through MCM 1 outreach and MCM 6 staff training.	Training attendance/materials and public education records.
Meet IDDE response timelines for immediate threats, non-emergency potential illicit discharges, and adjacent-MS4 notifications.	Centralized IDDE case log showing threat status, date received/identified, response or referral date, adjacent-MS4 notice if applicable, enforcement, and closeout.

MCM 4. Construction Site Stormwater Runoff Control

The City implements and enforces a construction-site runoff control program to reduce pollutants in stormwater runoff from construction activities that disturb one acre or more, including projects disturbing less than one acre that are part of a larger common plan of development or sale. The City also applies a more stringent local land-disturbance/SWPPP threshold of 5,000 square feet where applicable under City requirements.

The City maintains regulatory mechanisms for construction-site runoff control, including Ordinance No. 1689, which adopted Chapter 412, Erosion and Sediment Control Regulations, and amended related nuisance and enforcement provisions for land-disturbing activities. Ordinance No. 1689 establishes land disturbance permit requirements, SWPPP submittal requirements, inspection obligations, BMP maintenance requirements, stabilization requirements, and enforcement remedies. The City also relies on Ordinance No. 1635 and Ordinance No. 1684, as applicable, for stormwater enforcement and stormwater management procedures.

Construction Program Elements

Element	City implementation
Ordinance / regulatory mechanism	The City maintains regulatory mechanisms for construction site runoff control, including Ordinance No. 1635 for stormwater enforcement authority, Ordinance No. 1689 for land disturbance permit application requirements, and Ordinance No. 1684 for stormwater management requirements and procedures for new development projects. These mechanisms require construction site operators to implement erosion and sediment control BMPs and allow sanctions/enforcement to ensure compliance. The ordinances/code provisions are available through the City stormwater webpage or City Code records.
SWPPP and waste controls	Operators must implement appropriate erosion and sediment controls and control construction waste such as concrete washout, building materials, chemicals, fuels, litter, sanitary waste, and other pollutants that may affect water quality.
Plan review criteria	City review considers disturbed acreage, larger common plan status, receiving waters/discharge points, slopes/soils, drainage patterns, erosion and sediment controls, stabilization schedule, inlet/outlet protection, concrete washout, dewatering, fuel/chemical storage, waste management, inspection frequency, and corrective-action timelines.
Public concern intake	The City maintains a public inquiry/concern method on the stormwater webpage. The City reviews submissions and performs follow-up inspections when needed. Construction site signage should direct the public to the City reporting method when required by City procedure.
Inspections	The City performs or requires construction-site inspections. At a minimum, City inspections occur within 21 days of construction startup, during active construction, and at closeout; larger or priority sites may receive more frequent inspections. Inspection records should include receiving stream or downstream inlet observations for turbidity, sediment plume, deposits, discoloration, oil sheen, floatables, concrete washout indicators, or other apparent water quality impacts when accessible and applicable.
Enforcement	If deficiencies are identified, the City uses phone/email notices, written corrective action requests, reinspection, enforcement letters, sanctions, fines, stop-work or other available remedies under City code, including Ordinance No. 1635 and related land-disturbance/stormwater provisions, and permit procedures.

Construction Enforcement Ladder

Construction-site deficiencies will be tracked through a staged enforcement approach appropriate to the severity, recurrence, and water-quality risk of the violation. The typical progression may include verbal or email notification, written corrective-action request, reinspection, formal enforcement letter or notice of violation, stop-work order or other City sanction where authorized, referral to the appropriate agency when needed, and documented closure. Emergency or high-risk conditions may be escalated immediately.

Construction Inventory and Tracking Fields

The City will maintain a construction-site inventory/tracking log. The log may be kept in a spreadsheet, permitting software, or other organized record system, but it should include the following fields:

- Project name, address/location, permit number, and owner/operator/developer contact information.
- Disturbed acreage, total site acreage, larger common plan determination, receiving water/discharge point, and priority status.
- SWPPP/site plan review date, reviewer, approval status, and required revisions.
- Pre-construction conference/kickoff date, attendees, and checklist.
- Inspection date/time, inspector, weather, inspection type, BMP findings, deficiencies, corrective action deadline, and follow-up/reinspection result.
- Enforcement actions, correspondence, stop-work/fine/sanction if any, and final stabilization/closeout date.

MCM 4 Measurable Goals

Goal	Documentation
Maintain records of City-approved construction SWPPPs and site plans for applicable land disturbance permits.	Permit file, SWPPP review checklist, approved plans, and revision notes.
Maintain a current active construction inventory with project contact, size, priority status, inspection, and enforcement information.	Construction tracking log.
Inspect active construction sites according to the inspection schedule and prioritize sites based on risk.	Inspection forms, photos, corrective-action notices, reinspection notes, and receiving stream/downstream inlet observations where accessible and applicable.
Track public concerns and City responses related to construction stormwater runoff.	Public submission log, inspection/referral record, response record.
Review construction program effectiveness annually and modify procedures or tracking if gaps are identified.	Annual review memo/notes and annual report support records.

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

The City implements and enforces a post-construction stormwater program for new development and redevelopment projects that disturb one acre or more, including projects less than one acre that are part of a larger common plan of development or sale, and that discharge into the regulated MS4. The program uses a combination of ordinance requirements, plan review, permanent BMP design standards, long-term operation and maintenance requirements, inspection, and enforcement.

The City also maintains Ordinance No. 1886, which amended Chapter 550 of the Municipal Code by adding Section 550.035, prohibiting construction or other activities that affect stormwater management systems, including swales on private property, unless approved by City permit. Ordinance No. 1886 does not prohibit routine maintenance of landscaped areas or existing vegetation, but provides City permit review authority for construction or activities that affect stormwater management systems, including private-property swales. Ordinance No. 1886 supports the City's post-construction stormwater management program by requiring City Engineer review of proposed modifications and allowing the City to require supporting information such as grading plans, rain garden or infiltration basin details, and stormwater flow calculations.

Post-Construction Program Elements

Element	City implementation
Water-quality design strategy	During plan review, the City evaluates site characteristics and stormwater strategies to protect sensitive areas, minimize stormwater pollution, use effective BMPs, and attempt to maintain predevelopment runoff conditions.
Regulatory mechanism	The City uses its post-construction stormwater ordinances and related City standards/SOPs to address post-construction runoff from new development and redevelopment, including Ordinance No. 1684 for stormwater management procedures; Ordinance No. 1636 / City Code Sections 420.030 and 420.040 for long-term operation, maintenance, inspection, and implementation of post-construction BMP requirements where applicable; and Ordinance No. 1886 / City Code Section 550.035 for City permit review of proposed changes to stormwater management systems, including swales on private property. The ordinances/code provisions are accessible through the City stormwater webpage or City Code records and may be retained with the renewal support file.

Element	City implementation
Long-term O&M plan	The City requires owners/operators of post-construction BMPs to operate and maintain BMPs consistent with approved plans, O&M manuals, maintenance agreements, permits, or other required documents. Where applicable under City procedure, owners/operators are required to perform annual self-inspections and submit reports to the City by October 1. City-issued maintenance permits are tracked by permit date and expiration date; permits are generally tracked on a three-year cycle where required by City procedure.
Inspection plan	The City maintains and applies an inspection plan/schedule for post-construction BMPs. The City may inspect BMPs directly or require owner/operator inspection documentation. Deficiencies are tracked through correction, reinspection, and closeout, including follow-up communication with the owner/operator or responsible maintenance party.
Enforcement	The City uses ordinance authority and written communication to require maintenance, correction of deficiencies, reinspection, and escalation where necessary, including remedies available under Ordinance No. 1635, Ordinance No. 1636 / City Code Sections 420.030 and 420.040, and related City stormwater provisions where applicable.

Post-Construction BMP Inventory and Tracking Fields

The City will maintain a post-construction BMP inventory/tracking log. The log may be kept in a spreadsheet, permitting software, or other organized record system, but it should include the following fields:

- Site name, address/location, subdivision/development name, owner/operator/HOA contact information, and responsible maintenance party.
- Unique BMP ID, BMP type, number of BMPs, risk ranking/priority, receiving water/discharge point if known, and drainage area if available.
- Site-plan approval date, O&M agreement/manual status, permit/maintenance agreement status, and inspection frequency.
- Inspection date, inspector or owner inspector, inspection result, deficiencies observed, corrective action required, deadline, reinspection date, and closeout status.
- Enforcement correspondence, owner reports, maintenance records, unresolved-issue flag, closeout status, and annual inventory update date.

MCM 5 Measurable Goals

Goal	Documentation
Maintain and update the post-construction BMP inventory annually.	Inventory spreadsheet/database with annual update note.
Inspect or require inspection of post-construction BMPs according to the City inspection plan, owner self-inspection/reporting cycle, and permit cycle schedule. Where applicable, owner annual self-inspection reports are due to the City by October 1.	Inspection forms, owner self-inspection reports, photos, inspection log, permit/expiration tracking, and follow-up records.
Track deficiencies, corrective actions, reinspection, and enforcement until closure.	Deficiency notices, corrective-action records, reinspection notes, closure records.
Review ordinance/SOP effectiveness annually and update procedures if needed.	Annual review notes and any ordinance/SOP revisions.

MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

The City implements an operation and maintenance program with employee training to prevent or reduce pollutant runoff from municipal operations. The program addresses municipal staff training, municipal facilities, parking lots and paved areas, material handling, waste disposal, vehicle washing, spill prevention, flood management projects, facility inspections, and annual program review.

Industrial/NPDES Facilities, Salt/Sand, Snow Disposal, and Flood Management Review

The City will annually evaluate whether any City-owned or operated facility is subject to a separate NPDES industrial stormwater permit or no-exposure certification. If any such facility is identified, the facility name, permit number or no-exposure certification, and stormwater relevance will be added to the municipal facility inventory. Based on current City records, no City-owned or operated facility is identified as requiring separate industrial stormwater permit coverage.

The City will also annually evaluate whether it owns or operates salt/sand storage locations, snow disposal areas, maintenance yards, storage yards, fleet/maintenance shops, or other locations expected to contribute floatables or pollutants. If such operations are added or changed, the facility inventory, inspection checklist, training topics, and good housekeeping procedures will be updated.

If the City develops or designs new flood management projects during the permit cycle, the City will evaluate potential water quality impacts and incorporate water quality protection practices into planning, design, construction, and maintenance where applicable.

Municipal Staff Training

The City provides annual stormwater pollution prevention/good housekeeping training to municipal operations staff, including new employees and make-up training when needed. Training topics may include good housekeeping; vehicle/equipment maintenance; materials storage; trash, salt, and sand management; spill prevention and response; waste management; facility maintenance; parking lot and street maintenance; storage/use/disposal of paints, solvents, petroleum products, and chemicals; storm drain cleaning; landscaping and grounds maintenance; recognition and reporting of illicit discharges; construction and post-construction BMP awareness; and municipal facility inspections.

Training records will include the date, trainer or source of materials, topics covered, names of personnel trained, and make-up training if applicable. The training program coordinates with the other MCMs by supporting public education, public response, IDDE recognition, construction oversight, post-construction BMP maintenance awareness, and municipal good housekeeping.

Municipal Facilities and Operations

Facility / operation	Stormwater relevance	Controls / records
City Hall, 2032 Hanley Road	Public facility and parking areas may contribute floatables, trash, sediment, deicer, or other pollutants.	Routine housekeeping, parking lot observation/removal of floatables, spill prevention, public reporting, facility inspection record.
Maintenance Shed, 2080 Hanley Road	Municipal operations and equipment/material handling may contribute sediment, metals, petroleum, trash, chemicals, or floatables if not properly controlled.	Municipal facility SWPPP/inspection checklist, good housekeeping, material storage controls, spill kit, oil/grease separator and inlet/filter/BMP maintenance as applicable, floor-drain verification, dumpster/storage area controls, and scrap metal/material storage protected from stormwater.
Municipal parks: Dardenne Greenway at BaratHaven, Bluebird Meadow Park, Georgetown Park, City Hall Park	Parks and paved areas may contribute trash, sediment, yard waste, pet waste, nutrients, or floatables.	Routine park maintenance, trash/litter control, pet waste/public education, parking lot inspection, corrective work orders.
Municipal vehicle washing	Wash water may contain pollutants if discharged to MS4.	City-owned vehicles are washed at commercially licensed car washes or other locations where wash water is properly managed.
Paints, solvents, petroleum products, petroleum wastes, and spill response	Potential pollutants if exposed to stormwater or improperly disposed.	Store indoors/under cover; use compatible containment where needed; maintain spill prevention/response materials; dispose through appropriate facilities; document significant spills/cleanup.
Waste removed from storm sewers or City jurisdiction	Sediment, floatables, debris, and dredged material may contain pollutants.	Document significant quantities removed and disposal method/location.

Facility / operation	Stormwater relevance	Controls / records
Industrial/NPDES permit or no-exposure review	City-owned or operated facilities may require separate industrial stormwater permit coverage or no-exposure certification if pollutant-generating industrial activities are present.	Review annually; add any identified permit or no-exposure certification information to the municipal facility inventory and SWMP records.
Salt/sand storage, snow disposal, maintenance yards, storage yards, or fleet/maintenance shops	These operations may contribute floatables, sediment, deicer residue, petroleum products, metals, or other pollutants if present and not properly controlled.	Evaluate annually and update the facility inventory, inspection checklist, training topics, and good housekeeping procedures if such operations are added or changed.
New flood management projects	Flood management projects can affect water quality during planning, construction, operation, and maintenance.	Evaluate water quality impacts and incorporate water quality protection practices into planning, design, construction, and maintenance where applicable.

MCM 6 Measurable Goals

Goal	Documentation
Train municipal operations staff annually and provide make-up training when needed.	Training materials, attendance, date, and topics.
Maintain and annually update the municipal facility/operations list.	Facility list and annual review note.
Inspect municipal facilities and record corrective actions.	Facility inspection checklist, photos if useful, work orders, and closeout notes.
Track maintenance procedures, schedules, and long-term inspection schedules for controls reducing floatables and pollutants.	Maintenance schedule/log and corrective action records.
Track significant waste removed from the MS4 and disposal records.	Waste removal/disposal log for significant amounts.
Document spill prevention/response records and significant material disposal records.	Spill log, cleanup records, disposal receipts if applicable.
Review good housekeeping BMPs annually and update as needed.	Annual review note and SWMP update records.
Evaluate separate NPDES industrial stormwater permit/no-exposure applicability, salt/sand storage, snow disposal, maintenance yards, storage yards, fleet/maintenance shops, and new flood management projects annually.	Annual MCM 6 review note, facility inventory updates, inspection checklist updates, training topic updates, and flood-management water-quality review records if applicable.

Appendices

The following appendices support the SWMP and renewal package. The City may maintain detailed tracking records electronically if they are organized, readily available for review, and summarized in annual reporting.

Appendix	Content
Appendix A	BMP-level responsibility matrix, centralized logs, and annual review checklist
Appendix B	Storm sewer/outfall map, static export record, and outfall inventory support
Appendix C	Municipal facility SWPPP / good housekeeping inspection forms
Appendix D	Public notice, comments, meeting/Board record, permit/forms check, and adoption record
Appendix E	Construction-site and post-construction BMP tracking fields

Appendix A - BMP Responsibility Matrix, Centralized Logs, and Annual Review Checklist

This appendix is the City's working BMP management matrix. It should be reviewed at least annually and used to support the annual MS4 report, the annual Board of Aldermen update, and renewal records. Supporting records may be maintained electronically if they are organized and readily available for review. The matrix is intentionally maintained as an appendix so detailed BMP responsibilities can be kept auditable while the main SWMP narrative remains readable for public review.

A.1 BMP-Level Responsibility Matrix

MCM / BMP	Procedure	Measurable goal	Schedule	Responsible role	Required records / adaptive review
Program administration - SWMP control	Maintain current SWMP, contacts, version history, appendix index, and permit/forms verification memo.	Administrative records current before renewal submittal and annual report preparation.	Ongoing; formal review annually and before permit submittals.	City Engineer / Primary MS4 Contact; City Administrator	Version log, contact sheet, permit/forms verification memo, annual review notes.
Program administration - Board update	Provide annual Board of Aldermen update on SWMP implementation.	One formal Board update each reporting year.	Annually, preferably before annual report finalization.	City Engineer; City Administrator	Staff memo, agenda, minutes, presentation, Board action/reference if any.
MCM 1 - Webpage / reporting form	Maintain stormwater webpage with SWMP access, education materials, and reporting method.	Webpage active year-round; annual content review; update after SWMP revisions.	Continuous; review at least annually.	City Engineer; Administrative Support / Communications	Screenshots, update log, URL, inquiry log, analytics if available.
MCM 1 - Digital outreach	Publish seasonal stormwater education posts or electronic messages.	At least four outreach items per year.	Quarterly or seasonally.	Administrative Support / Communications; City Engineer	Screenshots, dates, topics, audience, analytics if available.
MCM 1 - Pre-construction education	Hold documented pre-construction conference or kickoff for applicable land-disturbance permits.	Applicable permitted projects receive a conference or documented kickoff.	At permit issuance / before construction start.	City Engineer / development review staff	Conference checklist, sign-in, permit file notes.
MCM 1 - Annual handout / fact sheet	Issue annual fact sheet, newsletter item, permit-counter handout, or equivalent item.	At least one targeted annual educational item.	Annually.	City Engineer; Administrative Support / Communications	Copy of material, distribution method, date, audience.
MCM 2 - Public notice	Post SWMP / major revision notice for public review when required or selected.	Document the notice period before finalizing renewal or significant SWMP revisions.	At renewal or significant revision.	City Engineer; City Administrator; Administrative Support	Notice text, screenshots, posting dates, affidavit if used.
MCM 2 - Comments and responses	Log public comments and City responses.	Track 100% of comments received and responses issued.	During notice period and closeout.	Administrative Support; City Engineer	Comment log, comments, response memo, SWMP change summary.

MCM / BMP	Procedure	Measurable goal	Schedule	Responsible role	Required records / adaptive review
MCM 2 - Public meeting / Board update	Conduct required public information meeting and annual Board update.	Meeting held when required; Board updated annually.	Renewal-specific and annual.	City Engineer; City Administrator	Agenda, minutes, attendance, presentation, staff memo.
MCM 2 - Public concern method	Maintain method for receiving stormwater concerns across all MCMs.	Reporting method continuously available and reviewed.	Continuous; review at least quarterly and annually.	Administrative Support; City Engineer	Central concern log, referrals, response and closure notes.
MCM 2 - Public involvement BMPs	Support cleanup, tree planting, habitat improvement, HOA/public training, stormwater booth, or equivalent activity.	At least two meaningful public involvement BMPs per permit cycle; one annually where practicable.	Annually / permit-cycle.	City Engineer; Parks / Grounds Staff; community support	Event records, sign-ins, photos, materials, results summary.
MCM 3 - Outfall map/inventory	Maintain electronic map of regulated boundary, outfalls, storm sewer infrastructure, and receiving waters.	Annual update and update after material changes.	Ongoing; annual review.	City Engineer / GIS support	Map update log, static export, outfall inventory.
MCM 3 - Dry-weather screening	Screen mapped outfalls under 72-hour dry-weather condition standard.	At least 60% of all mapped outfalls screened during the five-year permit cycle.	Annual work plan over permit term.	City Engineer; field inspector / consultant if used	Screening forms, weather documentation, photos.
MCM 3 - Priority areas	Review and update priority areas.	Priority-area list updated annually.	Annual.	City Engineer	Priority-area list, review memo.
MCM 3 - Source tracing / enforcement	Investigate suspicious flows, trace source, require correction, and close cases.	Credible IDDE complaints and findings tracked to disposition.	Ongoing.	City Engineer; enforcement/legal support as needed	IDDE case log, notices, reinspection, closure records.
MCM 3 - Training / outreach	Include IDDE recognition in staff training and public outreach.	IDDE addressed in annual staff training and recurring public outreach.	Annual.	City Engineer; Public Works / Municipal Operations Staff	Training records, outreach materials.
MCM 4 - Legal mechanism	Maintain construction-runoff legal authority and ordinance crosswalk.	Annual confirmation that legal authority remains current.	Annual.	City Engineer	Ordinance crosswalk, annual review note.
MCM 4 - SWPPP review	Review SWPPP/site plans using standard checklist.	Applicable projects reviewed with checklist.	At permit review stage.	City Engineer / development review staff	SWPPP checklist, review notes.
MCM 4 - Active construction inventory	Maintain active-site inventory with project, size, drainage, priority, and contacts.	Inventory current for active sites.	Ongoing.	City Engineer; Administrative Support	Construction inventory log.
MCM 4 - Inspections	Inspect sites within 21 days of startup, during active construction, at closeout, and more often for high-risk sites.	Active sites receive required inspection sequence.	Ongoing, risk-based.	Inspector / City Engineer	Inspection forms, photos, receiving stream/downstream observations.

MCM / BMP	Procedure	Measurable goal	Schedule	Responsible role	Required records / adaptive review
MCM 4 - Enforcement	Use staged corrective notices, reinspection, escalation, and closure documentation.	Documented deficiencies assigned corrective deadlines and tracked to closure.	Ongoing.	City Engineer; enforcement support as needed	Notices, enforcement ladder records, closure notes.
MCM 5 - Design / regulatory mechanism	Apply post-construction stormwater standards during plan review.	Applicable projects reviewed for water-quality design and long-term maintenance.	At development review stage.	City Engineer	Review checklist, ordinance crosswalk.
MCM 5 - O&M documents	Require O&M plans/agreements where applicable before final acceptance.	Applicable post-construction BMPs have O&M documentation.	Project closeout / acceptance.	City Engineer	O&M agreements, maintenance permit records.
MCM 5 - BMP inventory	Maintain inventory with unique BMP IDs, owner, type, location, inspection frequency, status, and risk ranking.	Inventory updated annually.	Ongoing; annual formal update.	City Engineer; Administrative Support / GIS support	BMP inventory, annual update memo.
MCM 5 - Inspections / owner reports	Inspect or require inspections on cycle; collect owner October 1 reports where applicable.	Applicable owner reports and City inspections tracked.	Ongoing; October 1 checkpoint where applicable.	City Engineer	Inspection forms, owner reports, follow-up log.
MCM 5 - Deficiencies / enforcement	Track deficiencies through corrective action, reinspection, and closeout.	Documented deficiencies tracked to closure or formal escalation.	Ongoing.	City Engineer; enforcement support as needed	Deficiency notices, reinspection notes, closure records.
MCM 6 - Employee training	Provide annual good-housekeeping training and make-up training.	Annual training completed for applicable municipal operations staff.	Annual; new-hire make-up as needed.	City Engineer; Public Works / municipal operations supervisors	Training log, materials, attendance.
MCM 6 - Facility inventory	Maintain current list of City-owned/operated facilities with stormwater relevance.	Facility list reviewed and updated annually.	Annual.	City Engineer; Public Works / Municipal Operations Staff	Facility inventory, annual review note.
MCM 6 - Facility inspections	Inspect municipal facilities using standardized checklist.	Listed applicable facilities inspected annually.	Annual.	Public Works / Municipal Operations Staff	Inspection forms, photos, work orders, closeout notes.
MCM 6 - Spill / leak management	Document spills, leaks, cleanup, and preventive follow-up.	Reportable events logged; annual no-spill notation if applicable.	Ongoing; annual certification.	Public Works / Municipal Operations Staff	Spill log, cleanup records, disposal receipts if applicable.
MCM 6 - Vehicle washing / material storage	Maintain approved vehicle-washing and protected material-storage practices.	No unauthorized discharge from municipal washing or exposed pollutant-generating storage.	Ongoing.	Public Works / Municipal Operations Staff	Inspection notes, corrective actions.

MCM / BMP	Procedure	Measurable goal	Schedule	Responsible role	Required records / adaptive review
MCM 6 - Waste removal / housekeeping review	Track significant waste removed from storm system or City jurisdiction and review BMP effectiveness.	Significant removals documented and good-housekeeping BMPs reviewed annually.	Ongoing; annual review.	Public Works / Municipal Operations Staff; City Engineer	Waste log, annual review note.
MCM 6 - Annual facility/ops review	Review industrial/NPDES applicability, salt/sand or snow disposal, maintenance/fleet/storage yards, and new flood projects.	Annual review completed; records updated if needed.	Annually and when operations change.	City Engineer; Public Works; City Administrator as needed.	Annual MCM 6 review note; inventory/checklist/training updates; NPDES/no-exposure or flood-review records if applicable.

A.2 Centralized Tracking Logs and Case IDs

The City may maintain logs in spreadsheets, permitting software, GIS, or another organized record system. Logs should use unique IDs where practical so records can be cross-referenced between complaints, outfalls, construction projects, post-construction BMPs, enforcement, and annual reports.

Log / template	Purpose	Recommended fields
Public concern master log	Centralize stormwater concerns across all MCMs.	Case ID; date received; reporter/contact if provided; MCM category; location; assigned reviewer; investigation/referral date; response date; closure date; corrective action.
Public notice comment log	Track public comments during SWMP public review or major revision periods.	Comment ID; commenter; date; topic; requested response; reviewer; response date; disposition; SWMP change if any.
IDDE case log	Track suspicious flows, complaints, spills, dumping, and illicit discharge investigations.	IDDE case ID; dates received/responded/referred/closed; threat status; location/outfall; indicators; diagnostic monitoring; source tracing; adjacent-MS4 notice; enforcement/corrective action.
Construction active-site log	Track construction projects and inspection/enforcement status.	Project ID; permit number; acreage; larger common plan status; priority level; pre-construction date; inspections; enforcement; closeout.
Post-construction BMP inventory	Track permanent BMP ownership, O&M, inspection, risk, and unresolved issues.	BMP ID; type; owner; responsible maintenance party; plan reference; O&M status; inspection frequency; risk ranking; unresolved issue flag.
Municipal facility inspection checklist	Track MCM 6 facility inspections and corrective actions.	Facility; date; inspector; storage; spills; floor drains; dumpsters; inlets; washing; waste disposal; corrections and closeout.
Annual adaptive-management memo	Document annual program review and BMP changes.	BMP reviewed; data considered; what worked; what did not; changes made; Board update reference; next-year action.

A.3 Annual Adaptive-Management Review Checklist

Review item	Annual review prompt	Record to retain
BMP implementation	Were scheduled BMPs completed and documented?	Annual BMP matrix update and support records.

Review item	Annual review prompt	Record to retain
Measurable goals	Were measurable goals achieved? If not, why and what will change?	Annual adaptive-management memo.
Public concerns and comments	Were concerns, comments, and responses reviewed for trends?	Public concern log and comment summary.
Inspections and enforcement	Were inspections completed and deficiencies closed or escalated?	Inspection/enforcement summary.
Maps and inventories	Were outfall, construction, post-construction, and municipal facility inventories updated?	Inventory update logs and static map export.
Board update	Was an annual Board of Aldermen update provided?	Agenda, minutes, staff memo, and presentation if used.
Program changes	What BMPs, procedures, tracking methods, or assignments changed for the next year?	SWMP update note or revision log.

Appendix B - Storm Sewer / Outfall Map and Outfall Inventory Support

The City maintains an electronic storm sewer/outfall map. The map should show the regulated MS4 boundary, mapped outfalls, storm sewer infrastructure, and receiving waters. The map should be updated at least annually and whenever field verification or development activity identifies changes. Outfall inventory records include outfall ID, location description, GPS coordinates, legal description if applicable, receiving water, outfall type/material/size if known, field verification date, priority status, dry-weather screening date, screening result, corrective action/enforcement if any, and next scheduled inspection.

Final package map record: In addition to the Online MS4 map, the City will retain a static PDF or image export in the renewal file showing the MS4 boundary, mapped outfalls, receiving waters, and representative outfalls used for the Form K/Form M renewal package.

Online map reference: Online MS4 map (maintained electronically by the City; full GIS/electronic map is the official record).

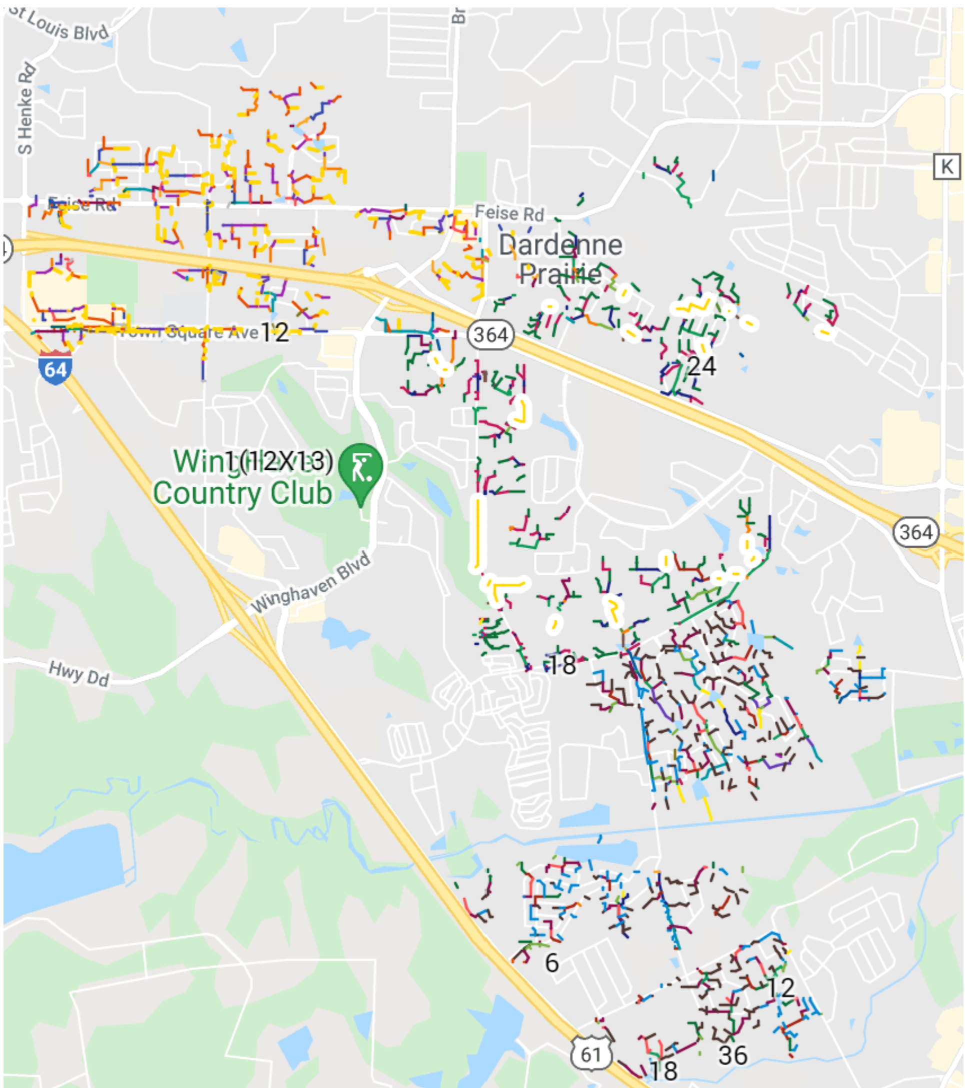

Figure B-1. City storm sewer map screenshot retained for SWMP reference. Maintain the full GIS/electronic map as the official record.

Appendix C - Municipal Facility SWPPP / Good Housekeeping Inspection Forms

This appendix provides the City's municipal facility SWPPP and good housekeeping inspection record format. The City may maintain completed facility inspections electronically. All City-owned or operated municipal facilities with potential stormwater relevance are included in the municipal facility inventory and annual MCM 6 inspection program. A site-specific figure is provided for the Maintenance Shed at 2080 Hanley Road because it is the City-owned municipal facility with the greatest potential for pollutant-generating municipal operations, including equipment/material storage, waste handling, and maintenance-related activities.

Table C-1. City-Owned Municipal Facilities Inventory

Facility / area	Stormwater relevance	Inspection approach / records
City Hall, 2032 Hanley Road	Public facility, parking areas, landscaped areas, public use areas; potential trash/floatables, sediment, deicer residue, and minor oil/grease from vehicles.	Annual municipal facility inspection, routine housekeeping, parking lot/inlet observation, litter/debris removal, spill prevention, and work-order documentation as needed.
Maintenance Shed, 2080 Hanley Road	Primary municipal operations facility with the greatest potential for pollutant-generating activities, including equipment/material storage, waste handling, maintenance-related activity, and outdoor operational areas.	Site-specific Figure C-1 retained; annual inspection checklist; material storage controls; spill response; floor drain verification; dumpster/scrap/material storage controls; corrective-action tracking.
Dardenne Greenway at BaratHaven	Public greenway/trail and park-related areas; potential trash/floatables, sediment, pet waste, drainage concerns, and maintenance-related debris.	Annual facility/park inspection; litter/debris removal; drainage/stormwater concern documentation; maintenance work orders as needed.
Dardenne Greenway at Bluebird Meadow Park	Public greenway/trail and park-related areas; potential trash/floatables, sediment, pet waste, drainage concerns, and maintenance-related debris.	Annual facility/park inspection; litter/debris removal; drainage/stormwater concern documentation; maintenance work orders as needed.
Georgetown Park	Public park areas, parking/access areas, landscaped areas, and drainage features; potential trash/floatables, sediment, pet waste, and maintenance-related debris.	Annual facility/park inspection; litter/debris removal; inlet/drainage observation; corrective-action or work-order documentation as needed.
City Hall Park	Public park and landscaped areas near City Hall; potential trash/floatables, sediment, pet waste, deicer residue near parking/sidewalk areas, and drainage concerns.	Annual facility/park inspection; routine housekeeping; inlet/drainage observation; maintenance documentation as needed.
Other City-owned or operated facilities added during the permit cycle	Stormwater relevance to be evaluated when the facility is added or when operations change.	Add to inventory and inspection checklist as needed; maintain records with the SWMP annual review file.

Site-specific figures may be maintained for additional facilities if pollutant-generating activities, operational changes, or stormwater concerns are identified during the permit cycle.

C.1 Stormwater Pollution Prevention Team

Name / title	Responsibility
Matthew Davidson, City Engineer	Primary MS4 contact; engineering review; renewal coordination; SWMP implementation support; facility inspection documentation oversight.
Kyle Michel, City Administrator	Administrative oversight; continuing authority coordination; authorized representative coordination.
Public Works / Municipal Operations Staff	Implement good housekeeping, inspect facilities, report spills or illicit discharge indicators, complete corrective actions, and participate in training.

C.2 Facility Materials, Pollutant Sources, and Controls

Area / process	Potential pollutants	Existing controls / BMPs	Inspection frequency
Maintenance Shed / storage areas	Sediment, metals, petroleum, oil/grease, chemicals, trash/floatables	Store materials indoors or under cover when practicable; keep containers closed/labeled; maintain spill materials; clean up tracked sediment/debris; confirm floor drains connect to sanitary sewer or document no storm sewer connection; keep dumpster lids/containment closed or covered when not in use; store scrap metal and other pollutant-generating items indoors, under cover, or otherwise protected from stormwater.	At least annually and during routine operations
Parking lots and paved areas at City facilities/parks	Trash, floatables, sediment, deicer residue, oil/grease	Routine housekeeping; remove floatables and debris; inspect inlets; document work orders for deficiencies.	Routine observation and annual facility review
Vehicle/equipment washing	Sediment, detergents, oils, grease, salts, grass clippings	Use commercially licensed car wash or equivalent controlled location; do not discharge wash water with pollutants to the MS4 without appropriate treatment.	Ongoing
Waste removed from storm system	Sediment, floatables, debris, dredged material	Dispose at appropriate facility; document significant quantities and disposal method/location.	As needed
Bioretention/inlet/oil-grease separator or similar site controls	Sediment, metals, petroleum, trash/floatables	Maintain according to facility inspection and maintenance schedule; correct clogging, sediment accumulation, or structural issues.	At least annually and after known issues

C.3 Spill / Leak Record

Date	Material / volume	Location	Action taken	Preventive follow-up	Closed?
Use this row as a record template. If no spills occurred during the reporting period, document "No reportable spills observed/reported during annual review" in the annual facility file.					

C.4 Annual Municipal Facility Inspection Checklist

Inspection item	Acceptable condition / review prompt	Result / corrective action record
Material storage	Materials stored indoors/under cover or otherwise protected from stormwater; containers labeled and closed.	Record result and work order/correction if needed.
Spill response	Spill kit/materials available where appropriate; staff know reporting and response procedure.	Record result and correction if needed.
Outdoor areas and parking lots	Trash, sediment, floatables, spills, and excessive deicer residue removed; no exposed waste observed.	Record result and correction if needed.
Storm drains/inlets/outfalls at City facilities	No evidence of illicit discharge, dumping, staining, sewage, unusual odor/color, or excessive sediment.	Record result and initiate IDDE investigation if needed.

Inspection item	Acceptable condition / review prompt	Result / corrective action record
Vehicle/equipment washing	Municipal vehicle washing occurs at commercial car wash or controlled location; no unauthorized discharge to MS4.	Record result and correction if needed.
Waste disposal	Significant waste removed from storm sewer/facility is disposed properly and documented.	Record disposal method and amount if applicable.
Training	Staff who work with municipal operations received annual training or make-up training.	Record date, attendees, and topics.
Floor drains	Confirm floor drains connect to sanitary sewer or document no storm sewer connection; no evidence of unauthorized discharge to storm sewer.	Record verification, uncertainty, or corrective action needed.
Dumpsters and outdoor containment	Dumpster lids closed; containment closed/covered when not in use; no leaking liquids, exposed waste, or windblown trash.	Record result and work order/correction if needed.
Scrap metal and pollutant-generating material storage	Scrap metal, parts, chemicals, petroleum-related materials, or other pollutant-generating items stored indoors, under cover, in containers, or otherwise protected from stormwater.	Record result and corrective action if needed.

Figure C-1 is provided for the Maintenance Shed because it is the City-owned municipal facility with the greatest potential for pollutant-generating municipal operations. Other City-owned facilities are covered through Table C-1 and the annual municipal facility inspection checklist. Site-specific figures may be maintained for additional facilities if pollutant-generating activities or stormwater concerns are identified. Maintenance Shed site plan/grading plan retained as facility reference:

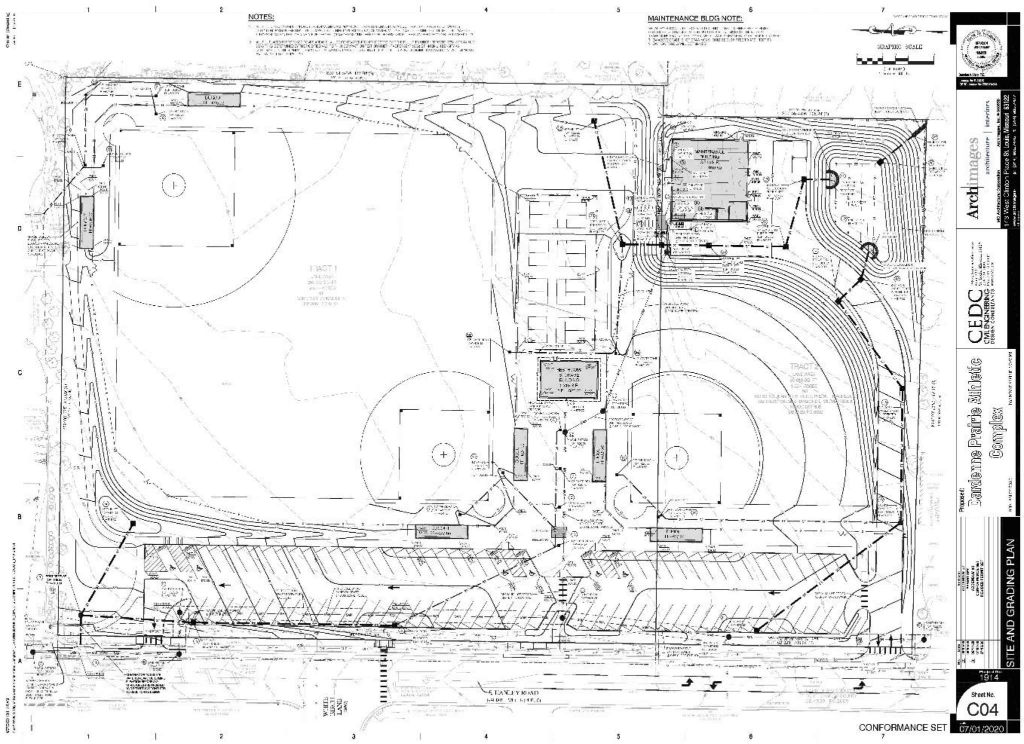

Figure C-1. Maintenance Shed site plan/grading plan reference. The City should retain the full-size plan separately if needed for facility inspections.

C.5 Municipal Facility SWPPP Appendix Review Statement

This municipal facility SWPPP appendix is included as part of the City of Dardenne Prairie MS4 Stormwater Management Plan and will be reviewed and implemented through the City's MCM 6 municipal good housekeeping program. Final certification of the complete SWMP, including this appendix, will be completed on the Final SWMP Certification / Adoption Page after public review, comment response, final permit/forms verification, and any required governing-body action.

Appendix D - Public Notice, Comment, and Adoption Record

This appendix is to be completed in the final adopted SWMP after the public review period. The draft version intentionally does not assert that the public notice period has occurred until the City completes and documents it.

Record item	Final documentation to insert or retain
Public notice start date	Insert date and retain screenshot/proof.
Public notice end date	Insert date and retain screenshot/proof.
Location of notice	City stormwater webpage and any additional notice method used.
Draft SWMP availability	Retain posted PDF/document, webpage screenshot, and download link.
Comments received	Attach or retain comment log and copies of comments. If none, document "No comments received."
Responses issued	Attach or retain responses/response memorandum.
Public information meeting / public hearing / annual Board update	Attach or retain notice proof, agenda, minutes, staff memo, presentation, sign-in/attendance, public comments, Board agenda/minutes, annual Board update materials, and Board action/reference if required or used under final MOR04C renewal instructions or City procedure.
Final adoption/certification	Attach or retain final signed certification and Board action/reference if applicable.
Final MOR04C permit/forms verification memo	Retain checklist/memo documenting final permit version, Form M/Form K versions, download/verification date, submission method, fee/invoice status, and post-review changes.
Supporting ordinances / code sections	Retain current City Code references or ordinance copies used to support the SWMP, including Ordinance Nos. 1635, 1636, 1684, 1689, and 1886, as applicable.

Appendix E - Construction-Site and Post-Construction Tracking Fields

E.1 Active Construction Inventory Fields

Field group	Required tracking fields
Project identification	Project name; address/location; permit number; owner/operator/developer; contractor; site contact; phone/email.
Project size/risk	Disturbed acreage; total acreage; larger common plan determination; priority status; receiving water/discharge point; sensitive areas if known.
Plan/SWPPP review	SWPPP received; site plan received; reviewer; review date; deficiencies; approval date; revisions required.
Pre-construction conference	Date; attendees; checklist topics; SWPPP/BMP expectations discussed; follow-up actions.
Inspection	Date/time; inspector; weather; inspection type; BMPs observed; deficiencies; corrective action deadline; photos; receiving stream/downstream inlet observation for turbidity, sediment plume, deposits, discoloration, oil sheen, floatables, concrete washout indicators, or other water quality impacts; corrective action required?; follow-up/reinspection result.
Enforcement/closeout	Notice/correspondence; enforcement level; reinspection date; final stabilization; closeout date; records retained.

E.2 Post-Construction BMP Inventory Fields

Field group	Required tracking fields
Site identification	Site name; subdivision/development; address/location; owner/operator/HOA contact; responsible maintenance party.
BMP information	Unique BMP ID; BMP type; number of BMPs; risk ranking/priority; drainage area if available; receiving water/discharge point if known; plan sheet/reference.
O&M documentation	O&M agreement/manual status; permit/maintenance agreement status; permit date; expiration date; site plan approval date; inspection frequency; owner annual self-inspection report due date/status, including October 1 reporting where applicable.
Inspection/maintenance	Inspection date; inspector or owner inspector; inspection result; deficiencies; corrective action; deadline; reinspection date; owner annual report received; maintenance performed; closeout status.
Enforcement/annual update	Owner correspondence; enforcement action; unresolved-issue flag; closeout status; inventory update date; annual review notes.

E.3 Enforcement Ladder Tracking Fields

The enforcement ladder below may be used for MCM 4 construction-site deficiencies, MCM 5 post-construction BMP deficiencies, IDDE cases, or municipal-facility corrective actions, as appropriate to the severity and authority involved. Emergency, repeated, or high-risk conditions may be escalated immediately.

Level	Typical action	Record to retain
1. Field / verbal / email notice	Notify responsible party of deficiency and required correction.	Date, contact, deficiency, requested correction, deadline if any.
2. Written corrective-action request	Issue written request when correction is not immediate or deficiency is significant.	Written notice/email, photos, deadline, assigned reviewer.
3. Reinspection / follow-up	Verify whether correction was completed.	Reinspection form, photos, result, updated deadline if needed.
4. Formal enforcement letter / notice of violation	Escalate under applicable City ordinance or permit procedure if deficiencies are unresolved, repeated, or high risk.	Formal letter/NOV, code reference, response requirement, enforcement file.

Level	Typical action	Record to retain
5. Stop-work, fine, sanction, permit action, or referral	Use available remedies where authorized and warranted.	Order/sanction record, referral record, legal/administrative correspondence.
6. Closure	Document correction, referral, or other final disposition.	Closure date, final inspection, closeout note.

E.4 Annual Program Data to Verify

Before final adoption and during annual review, the City should verify the current outfall count, post-construction BMP inventory, role assignments, software/spreadsheet locations, inspection schedules, and any final MOR04C permit or form changes. Verification records should be retained with the SWMP annual review file.

Final SWMP Certification / Adoption Page

Final certification to be completed after public review, comment response, final permit/forms verification, and any governing-body action required by City procedure. This page is placed at the end so the responsible official signs the complete SWMP package, including appendices.

Responsible official	Title	Signature	Date
Kyle Michel or authorized representative	City Administrator / Authorized Representative		