

County of St. Charles, Missouri
MS4 Stormwater Management
Plan

(MOR040058 / 2021 - 2026)

October 1, 2021



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Contact Information (3.1.B):

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See [Appendix B](#), pgs. B-2 & B-3 for Primary Persons Responsible for all MCMs and a listing of all County Facilities.

Regulatory and Background Information:

St. Charles County, Missouri is a Class 1 county. St. Charles County has been a regulated MS4 since the advent of the Phase II NPDES program and the County established its first SWMP and obtained its first MS4 permit in 2003. St. Charles County was one of the first communities in the state in adopting a sediment & erosion control ordinance in January 1990 (regulating $\geq 20,000$ s.f. land disturbances), a natural watercourse preservation & vegetative buffer protection ordinance in 2002, and a tree preservation ordinance in 2004. Stormwater detention for peak flow rates became a development requirement in the mid-1980s. St. Charles County became part of the FEMA Flood Insurance Program in September 1978. St. Charles County became part of the [Community Rating System](#) in 1993, and it is currently at Class 7 in the program (allowing County residents purchasing federal flood insurance a discount in their rates). St. Charles County has historically used zoning regulation and master planning to regulate development, preserve rural & agricultural areas, and to protect environmentally sensitive & historically valuable areas through its [Unified Development Ordinance](#) and its [Community Plans](#) including current Master Plans, Envision 2025 & 2030. Due to this early and consistent proactive approach to development and stormwater management, St. Charles County has been able to reduce or avoid many of the common stormwater quality, erosion, and flooding problems that can result from urban development. For these reasons, most of the County's current SWMP will continue to be

used in place; however, portions of the SWMP will need to be modified or expanded to address the current permit requirements, particularly under MCM #3.

St. Charles County is unique in several different ways regarding addressing stormwater regulations under the federal Clean Water Act and the MDNR MS4 permit:

- ◆ St. Charles County's northern and southern borders are formed by the Missouri, Mississippi, and Cuivre Rivers with the northeastern tip of the county being the location of the confluence of the Missouri and Mississippi Rivers. Approximately 43% of the County is within regulated 100-yr floodplain.
- ◆ 2018 Land Use is composed of 59% Agriculture, 19% Residential, 11% Parks & Open Spaces, 4% Commercial, 1% Industrial uses.
- ◆ St Charles County's land area is 564.37 sq. miles, 30% of which is situated within the incorporated communities of the County leaving 391.5 sq. miles of unincorporated county. The unincorporated county's Urban Service Area (the anticipated major growth area generally following a boundary where water & sewer are provided or planned to be provided) is 89.2 sq. miles out of a total of 219.2 sq. miles.
- ◆ The bulk of the urban development that has occurred and remained in the unincorporated County is within an area referred to as the "Golden Triangle," which is the area bounded by the Missouri River and Highways 64 and 70. The unincorporated County's urbanized area and population is small (+/- 65K) compared to the overall population (+400K) and it is focused within and adjacent to the Golden Triangle and along Highways 61 & 70 mainly where properties are served by Duckett Creek Sewer District, Public Water Supply District #2, or private facilities meeting the County's [wastewater disposal codes](#).
- ◆ Growth of higher density development in the unincorporated County will only occur in watersheds that are not served by municipal sanitary sewage service and are served by Duckett Creek Sewer District, Public Water Supply District #2, or private facilities meeting the County's [wastewater disposal codes](#). Duckett Creek Sewer District currently has long range plans to construct a sewer treatment plant discharging to Dardenne Creek near Hopewell Road that could serve unincorporated development in that watershed south of Hwy N.
- ◆ While urban development has boomed during the last four decades, a significant amount of land is still in agricultural use within the unincorporated County. Over 59% of property is in agricultural use with 69% of all prime farmland being in the floodplain areas formed by the confluence.
- ◆ The southwestern portion of the County has maintained a rural and agricultural nature. The area is rich in history as portions of the valley were settled by the Boone family in the late 1700s/early 1800s. Agri-tourism, wineries & vineyards, farming, nurseries & landscaping, parks, and rural residential are the predominate land uses in the area.

- ◆ St. Charles County continually seeks and maintains partnerships with local, state, and federal agencies and non-profits to help operate its SWMP. The County provides annual funding to the local St. Charles County Soil & Water District and the University of Missouri Extension and has a contract with the local St. Charles County Soil & Water District to support the delivery of outreach and conservation programs to the agricultural community and to rural and urban residents.

Focus & Strategy:

The focus of the County's SWMP will be on 1) the urbanized area of the unincorporated County, within and around the Golden Triangle and 2) areas outside the Golden Triangle along state maintained highways and arterial roads served by non-municipal sanitary sewer agencies, and will promote a mix of public education/outreach/involvement, application of non-structural & structural BMPs, and enforcement to the maximum extent possible.

In areas of predominately rural and agricultural development, the County will continue to focus on the use of non-structural BMPs (master planning & zoning regulation, conservation setbacks, disconnection of impervious, wastewater disposal standards, and outreach, etc.) and partnership with the local soil & water conservation district for outreach and education.

TMDL Information:

Not Applicable

Co-Permittee Information (3.2):

Not Applicable – However, the County seeks partnerships with municipal MS4s within the county to participate in and promote MCMs 1&2. The County provides funding and contracts with the St. Charles County Soil & Water Conservation District to help provide education and outreach programs for MCMs #1 & 2. The District also provides programs that support MCMs #4 & 5 for properties in agricultural use. The County provides funding for the UM Extension program and seeks partnerships for the promotion, programing, and participation of educational outreach to County residents.

Stormwater Program Review and BMP Iterative Process (3.3):

The County MS4 Director meets with responsible staff for each MCM annually (January) to review each program's measurable goals, review all BMPs for effectiveness, review to ensure that the MCMs are supporting each other and functioning in a holistic, coordinated manner, and to identify areas of improvement. The information collected is included in the County's Annual Report.

MCMs

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.

<u>Target Audiences:</u>	<u>Explanation of why audience was chosen:</u>	<u>Target Pollutants:</u>	<u>Sources of Pollution:</u>	<u>Educational BMP(s)</u>	<u>Goal of BMP</u>
County Residents	Improper lawn care, property management and usage activities can lead to pollutants in runoff, trash/waste/floatables, erosion and sediment runoff. Historically, this audience accounts for most of all SW complaints.	Common residential storm water pollutants: grass-clippings & leaf litter, fertilizers & pesticides, pet waste, household hazardous waste, solid & petroleum-based waste, failing septic systems	Residential property owners & renters	See Appendix A , pgs. A-2 – A-5 for a list of 17 specific BMPs (#1-17).	See Appendix A, pgs. A-2 – A-5 for a list of 17 specific BMPs & goals
Schools, Educational Organizations, Youth Groups	Providing education to the County’s young residents about stormwater and their impacts that can affect the quality of our water is essential to altering & guiding future behavior that helps sustain and protect our streams and waterbodies.	Common residential storm water pollutants: grass-clippings & leaf litter, fertilizers & pesticides, pet waste, household hazardous waste, dumping solid & petroleum-based waste.	Students and children of County residents	See Appendix A , pgs. A-6 – A-7 for a list of 6 specific BMPs (#19-24)	See Appendix A, pgs. A-6 – A-7 for a list of 6 specific BMPs & goals
Development Stakeholders – (Developers/Engineers/Contractors/Builders)	Improperly managed & maintained land disturbance & development sites can lead to sediment runoff, chemical/toxics spills, petroleum & vehicular fluids, trash, waste, & floatables leaving the site, and erosion, flooding, and property damage. Residential & commercial development accounts for 23% of the County’s land use.	Sediment runoff, litter & trash containment, chemicals, petroleum & vehicular fluids	Contractors/ Construction workers, improperly protected sites	See Appendix A , pgs. A-7 – A-8 for a list of 4 specific BMPs (#26-29)	See Appendix A, pgs. A-7 – A-8 for a list of 4 specific BMPs & goals

Residential Homeowners Associations (HOAs), & Commercial Business Owners	Improper lawn care, property management and usage activities can lead to pollutants in runoff. Improper maintenance of post-construction BMPs can lead to erosion, flooding, & property damage. Residential & commercial development accounts for 23% of the County's land use.	Grass clippings & leaf litter, fertilizer & pesticides, litter & trash, petroleum & vehicular fluids	HOA trustees & business owners' improper maintenance or lack of maintenance	See Appendix A , pg. A-9 for a list of 3 specific BMPs (#31-33)	See Appendix A, pg. A-9 for a list of 3 specific BMPs & goals
County Staff: (operation, maintenance & construction management staff of Highway, Airport, Facilities, Parks, Family Arena facilities)	Improperly maintained facilities, material storage, and SW BMPs can lead to sediment runoff, chemical, petroleum, & toxics spills/discharges, and trash/waste/floatables leaving the site	Sediment runoff, fertilizer & pesticides, litter & trash, de-icing/rock salt (usage & storage), petroleum & vehicular fluids, chemicals/paint (usage & storage), wash water	County staff & improper storage & disposal of materials	See Appendix A , pg. A-10 for a list of 3 specific BMPs (#35-37)	See Appendix A, pg. A-10 for a list of 3 specific BMPs & goals
Agricultural Stakeholders	59% of the County's land use is Agricultural & SW runoff is not regulated. Improper agricultural operations can result in soil loss, erosion, sediment runoff, and chemical (fertilizers, pesticides) & animal waste in runoff.	Sediment runoff, chemicals (fertilizers & pesticides), animal waste	Farmers, ranchers, rural recreation	See Appendix A , pgs. A-10 – A-11 for a list of 5 specific program elements (#39-43)	See Appendix A, pgs. A-10 – A-11 for a list of 5 specific program elements & goals
All Target Audiences	N/A	All Target Pollutants	All Sources	See Appendix A , pg. A-12 (#44): Update the current Comm Dev SW webpage to house more robust & centralized information and links to other specific County Departmental and partner SW webpages and promote in a more prominent manner & location.	Ensure that all educational resources and outreach are appropriately branded, support each of the MCMs in a holistic manner, are promoted to the maximum extent possible, and tie the program back to public comment & involvement in development of the SWMP.

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 County's policy is to hold a public notice period for a minimum of 30 days on the County's draft SWMP each time significant revisions to the SWMP are made. The County advertises the public notice of the SWMP on the County's website, [Community Development](#) main page, and houses the MDNR permits and draft SWMP on the [MS4 Stormwater Permit/Plan](#) webpage with the disclaimer that the draft SWMP will be posted for review and public comment for the selected number of days (minimum of 30). The County also distributes copies of the draft SWMP to its Floodplain Vision Board, its Commission on Environmental Quality, and to the local Homebuilders Association for distribution to its members and constituents for comment. The County provides public comment submission through the County's website/email, as well as a mail-in option with the address posted on the website. The County's policy is to respond 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 County for at least 3 years.

The County held a public notice period for the draft SWMP February 19, 2021 – March 26, 2021. The County received and responded to 2 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 County's policy is to hold a public meeting/presentation for the proposed SWMP. Public notice to announce the meeting will be posted on the County's website, [Community Development](#) main page, a minimum of 30 days prior to the hearing. The meeting announcement will remain posted on the website the entire 30 days.

The County held a public hearing/presentation at the regular monthly Planning & Zoning Commission Meeting on March 17, 2021. Notice for the public hearing/presentation was posted on February 12, 2021. The meeting agenda and summary notes are available to view on the County's [Agenda Center](#) webpage and the 3-17-21 P&Z meeting is also available to [view](#) (click on links – SWMP presentation begins at the 5:11:55 mark). A link to the presentation was added to the Public Notice on March 22, 2021.

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 County utilizes a web-based/email public comment submission platform located on the County's [MS4 Stormwater Permit/Plan](#) web page. The County also accepts hand-written comments/concerns/inquiries. Both the submission options are monitored by County staff daily. The County's policy is to respond to all SWMP comments/concerns/inquires within 7 days of receipt. The County also maintains a [Code Enforcement/Property Maintenance Complaint webpage](#) and uses its public access [Citizenserve electronic web portal](#) for the submittal of concerns, complaints, or comments for any stormwater pollution and development related issues (see 4.4.D, pg. 15). The County's policy is to respond to all comments/concerns/inquires within 24 hours and to investigate within 7 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 County does not utilize a stormwater management panel or committee. The County does involve its Floodplain Vision Board and Commission on Environmental Quality for review of its stormwater regulations and SWMP. These boards/commissions are comprised of citizen representatives appointed by the County Executive.

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 County has a completed storm sewer system map. GIS is utilized to maintain and update the map as needed. AutoCAD files of storm sewer design and as-built construction are required to be submitted to the County for all new developments and redevelopments as part of the permitting process per ordinance Sections [405.525.D](#), #12.d(2) and [410.160.E](#) (click on links to ordinance). The [Public GIS map](#) is accessible to view on the County's website. To review the storm sewer information, pull down the "Layers" menu, click on the "Utilities" layer box, and click on the appropriate stormwater boxes. Municipal storm sewer systems and sanitary sewer systems are also available. The Community Development Department also has a specialized version of this map that is not available to the public with additional storm sewer & watercourse information/layers.

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 County has a completed Illicit Discharge & Connection Ordinance in place. [Chapter 422 Illicit Discharge and Connection Regulations](#) is the regulatory mechanism. The County also has an ordinance to address illegal dumping of solid waste in [Chapter 240, Solid Waste Management Code](#). The ordinances are accessible on the County's website (click on links above). The ordinances are 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 County uses [Chapter 422 Illicit Discharge and Connection Regulations](#), [Chapter 240, Solid Waste Management Code](#), and it currently refers to the City of O’Fallon’s IDDE SOP for detecting and addressing illicit connections and unauthorized non-stormwater discharges, including illegal dumping, into the County’s MS4. The County is currently modifying the O’Fallon SOP for specific use with the County’s IDDE program. The expected completion date of the modification is currently December 31, 2021. A copy of the O’Fallon SOP and a memo describing the specific Environmental Health & Protection Division’s SOP for addressing illegal dumping of solid waste are attached to the SWMP in [Appendix C](#), pgs. C-2 & C-47. The ordinances and SOPs are reviewed annually, and updates are made as needed.

The Building Code Enforcement (BCE) Division administers and enforces [Section 422, Illicit Discharge and Connection Regulations](#) of St. Charles County. The BCE Division also manages a program regulating and inspecting individual sanitary/septic disposal systems through its Building Codes. The Division of Environmental Health and Protection administers and enforces [Chapter 240, Solid Waste Management Code](#) of St. Charles County, which addresses illicit discharges related to solid waste.

1. Applicable response timelines are addressed in ordinance [Section 422.130 Notification of Spills](#) and the Enforcement Sections [422.140](#) – [422.230](#).
2. Procedures for tracing the source of an illicit discharge, including specific techniques used to detect the location of the source are addressed in Chapter 4 of the O’Fallon IDDE SOP ([Appendix C](#), pg. C-25) and in ordinance [Section 422.100 Monitoring of Discharges](#).
3. Illicit connections are remediated under ordinance [Section 422.080 Suspension of Access To Stormwater Drainage Systems](#). Containment and removal/remediation of the illicit discharge is regulated under ordinance [Section 422.110 Requirement To Prevent, Control and Reduce Stormwater Pollutants By The Use of Best Management Practices](#), [Section 422.130 Notification of Spills](#), the Enforcement Sections [422.140](#) – [422.230](#), and Chapter 5 of the O’Fallon IDDE SOP ([Appendix C](#), pg. C-29).
4. Education is always a component of any illicit discharge & connection case. Where the source of the discharge and violators cannot be determined, the County has door-hangers ([Appendix C](#), pg. C-48) that are posted notifying residents/businesses of the specific pollutants found in the MS4, that it is a violation, steps available to properly dispose of the pollutant, and contact information for the reporting of illicit discharges. These are distributed to all properties within the watershed area or subdivision blocks of the discharge location. An accompanying letter is also sent to the HOA trustees in subdivisions. In hot spot areas where storm sewer inlets are not identified, the County has

storm drain placards ([Appendix C](#), pg. C-50) that are adhered to the inlets to identify them as draining directly to streams – no dumping.

Solid waste violations are regulated under [Section 240.360 Violations – Notices, Chapter 240, Article XVII, Administration and Enforcement](#), and per the Environmental Health & Protection Division SOP in the memo attached in [Appendix C](#), pg. C-47.

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

- ◆ The County’s Division of Environmental Health and Protection hosts a variety of resources on their [webpage](#) including webpages dedicated to:
 - [Water Quality](#) that includes a variety of resources addressing the hazards associated with illegal discharges and the improper disposal of waste and the household hazardous waste disposal and recycling services available for use in the County,
 - [Recycling](#) providing resources concerning [household hazardous waste](#) and locations for disposing of waste.
 - [Solid Waste Management](#) providing opportunity to report illegal dumping.
- ◆ The County’s Division of Environmental Health and Protection creates promotional items (made from recycled materials) and handouts that are distributed at their facilities and Earth Day and other County sponsored events to promote the household hazardous waste disposal and recycling services available for use in the County.
- ◆ The County requires all new storm sewer inlet/manhole covers to be marked, “No Dumping – Drains to Stream.”
- ◆ Where the source of any discharges and violators cannot be determined, the County has door-hangers ([Appendix C](#), pg. C-48) that are posted notifying residents/businesses of specific pollutants found in the MS4, that it is a violation, steps available to properly dispose of the pollutant, and contact information for the reporting of illicit discharges. These are distributed to all properties within the watershed area or subdivision blocks of the discharge location. An accompanying letter is also sent to the HOA trustees in subdivisions. In hot spot areas where storm sewer inlets are not identified, the County has storm drain placards ([Appendix C](#), pg. C-50) that are adhered to the inlets to identify them as draining directly to streams – no dumping.
- ◆ The County conducts annual training with all staff that are involved with its facility and equipment maintenance and storage of materials and bi-annual training for staff that is involved with capital projects and construction permitting per 4.6.A, pg. 20.
- ◆ The County uses other education and outreach programs – see specific education & outreach BMPs in [Appendix A](#), pgs. A-2 – A-11, 4.1.C, # 1-2, 4-10, 14-15, 17, 19-24, 26-29, 31-33, 35, 37, and 39-42.

How the County's plan coordinates with MCM #1: The County provides and promotes waste disposal & recycling facilities and it uses specific resources to provide education & outreach to the community with the goal of being proactive in its approach to reducing the potential for illicit discharges. Education & outreach are targeted to priority areas. Where illicit discharges do occur, targeted education is a component of remediation. All County educational BMPs shall reference/link to the County's SW webpages for additional outreach and reporting resources.

How the County's plan coordinates with MCM #2: The County offers and promotes waste disposal & recycling facilities to help reduce IDs. Promotion includes programs and events to involve residents in recognizing, addressing, and preventing or reporting illicit discharges. See specific programs promoting public involvement in [Appendix A](#), pgs. A-2 – A-11, # 1-2, 4-6, 8-17, 18A, 19-24, 27-29, 35, 37, and 39-42.

How the County's plan coordinates with MCM #4: To help reduce illegal discharges and the improper disposal of waste from construction sites, the County requires review and approval of SWPPPs, pre-construction meetings with operators to review and provide for good-housekeeping BMPs on construction sites, regular inspections and reporting of construction site BMPs, and enforcement mechanisms to address the discharge of pollutants from construction sites. The County also conducts an annual seminar for development stakeholders to provide education and resources to better address construction site stormwater management.

How the County's plan coordinates with MCM #5: To help reduce illegal discharges and the improper disposal of waste from post-developed sites, the County requires review and approval of development plans that includes the requirement for labeling/identifying all new storm sewer inlets, the design for permanent post-construction stormwater management practices, long-term preservation and maintenance of post-construction stormwater management facilities to ensure their functionality, and regular inspections and enforcement of permanent stormwater BMPs to ensure they are properly and regularly maintained. Educational resources are provided to the owners of the facilities. The County also conducts an annual seminar for development stakeholders to provide education and resources to better address post-construction stormwater management.

How the County's plan coordinates with MCM #6: To help reduce illegal discharges and the improper disposal of waste from County facilities, the County conducts an annual training program with all staff that are involved with its facility and equipment maintenance and storage of materials and a bi-annual training presentation with all staff that are involved with capital projects and construction permitting. The County also conducts semi-annual street sweeping and provides waste disposal/recycling facilities for the collection of household hazardous waste material; thereby, reducing the potential for ID.

How the County's plan coordinates with monitoring: N/A, the County does not conduct routine monitoring. Dry weather field screenings are used as a component to determine priority areas and target educational outreach.

How the County's plan coordinates with Integrated Planning: N/A, the County does not utilize Integrated Planning.

How the County's plan coordinates with TMDL Implementation: N/A, the County is not impacted by a TMDL.

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 County historically had been performing its dry-weather field screenings in waters of the state until a 2018 audit by MDNR clarified the need to perform these inspections on individual outfalls. The County's plan for implementation of a dry weather field screening strategy for unauthorized non-stormwater flows is currently under development. The expected completion date of the plan is currently December 31, 2021. Any changes to this date will be noted in the County's Annual Report. The SOP will be reviewed annually, and updates will be made as needed.

The following is an outline of the specific SOP that the County is currently using and developing:

1. The County has currently identified the Golden Triangle region and urbanized areas adjacent to the Golden Triangle and along state-maintained highways served by non-municipal sanitary sewer agencies as its priority areas likely to have illicit discharges.
2. The County will perform screenings of 100% of the outfalls in the priority areas within the first two years of the program and again within the last three years of the permit.
3. The County will perform screenings on its remaining outfalls within the last three years of the permit.
4. The County will review and evaluate all outfall screenings on an annual basis to determine if the priority areas need to be redefined or if hotspots exist.
5. Priority areas will include, but are not limited to:
 - a. any area where there is ongoing evidence of illicit discharges or dumping (hotspots),
 - b. areas with higher likelihood of illicit connections such as neighborhoods with onsite sewage,
 - c. areas with a high percentage of directly connected impervious areas that were developed prior to post-construction stormwater management regulations, and
 - d. areas with industrial zoning and use.
6. Outfalls in priority areas will be screened on a bi-annual basis. Outfalls outside of priority areas will be screened once per permit period (every five years).
7. A copy of a Dry Weather Field Screening Inspection form the County has developed for its screenings has been included in [Appendix C](#), pg. C-52. This includes 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 data is collected on an application (Survey123) developed by the County's GIS division and retained in the County's GIS database.
8. Where visual indicators or sampling of discharge indicate possible unauthorized non-stormwater flows or water quality impairment, the County shall proceed to further investigation and sampling per the processes outlined in 4.3.C, pg. 9.

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.

The County has established and maintains procedures for identifying priority areas:

- ◆ The County utilizes its GIS Map to review the priority areas identified in 4.3.E, #5. To identify areas with higher likelihood of illicit connections and effluent failures in neighborhoods with onsite sewage, the Community Development Department maintains a GIS mapping layer of properties with private sewage disposal systems.
- ◆ The County reviews its dry weather screening inspections of outfalls, illicit discharge & illegal dumping cases/complaints files, Mission Clean Stream debris removal metrics (see [Appendix A](#), pg. A-2, 4.1.C, #1), and Highway Department Street & Storm Sewer Cleaning records (see [Appendix A](#), pg. A-16, 4.6.E, #5A) annually to identify priority areas where there is ongoing evidence of illicit discharges or dumping (hotspots).
- ◆ The County inspects all outfalls in priority areas bi-annually and it reviews its dry weather screening inspections of outfalls and illicit discharge cases/complaints files annually in priority areas identified in 4.3.E, #5.
- ◆ The County modifies its priority areas, as needed, based on the annual review.

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 County has a completed [Illicit Discharge Ordinance](#) which includes specific enforcement procedures in Sections [422.140](#) - [422.230](#) and a [Solid Waste Management Ordinance](#) which includes specific enforcement procedures in [Section 240.360 Violations – Notices](#) and [Chapter 240, Article XVII, Administration and Enforcement](#). The ordinances are accessible on the County’s website (click links above). The ordinances are 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 County has a completed Land Disturbance Construction Ordinance in place. Land disturbance activities are regulated by [Chapter 412 Erosion and Sediment Control Regulations](#) and Section 60 of the [Design Criteria for the Preparation of Improvement Plans](#). The ordinance and design criteria are accessible on the County's website (click on links above). The ordinance is reviewed annually, and updates are made 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 County utilizes Chapter 412 of the UDO and SOPs for construction site operators to ensure construction sites are managed appropriately. [Chapter 412, Article III](#) provides specific requirements for construction site operators that include [Plan Submittal Requirements](#), [Performance Guaranty](#) requirements, [Issuance & Transfer of a Land Disturbance Permit](#), contractor [Requirements Before Construction Startup](#), [Plan Modifications During Construction](#), [Inspections & Reports](#), [Violations, Corrections & Enforcement](#), and [Closing of Land Disturbance Permits](#).

The County also reviews the SWPPP, issues handouts and checklists, and reviews County SOPs and inspection/reporting requirements with the contractors at the required preconstruction meeting prior to issuing a land disturbance permit (see [Appendix C](#), pg. C-68 for copy of contractor pre-construction handout packet). [Section 412.110.5](#) requires that the contractor provide details on controlling construction site waste, including, but not limited to discarded building materials, concrete truck washout, chemicals, trash/litter, and sanitary waste. SOP, contractor checklists, and inspection reporting forms are also accessible on the County's [Land Disturbance Permit webpage](#). The SOP and construction site permit 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 County utilizes Chapter 412 of the UDO, Section 60 of the [Design Criteria Manual](#), and SOPs/checklists for review of all pre-construction site plans for consideration of potential water quality impacts. [Chapter 412, Article II, Section 412.060](#) provides specific requirements for plan submittal, review, and approval. [Chapter 412, Article IV](#) of the UDO addresses design requirements and performance goals for potential water quality impacts. County staff utilizes the Citizenserve software system to process, document, and manage all permits. A land disturbance ESC plan review checklist is incorporated into this software system. This checklist is also available in Appendix A of the [Design Criteria Manual](#) and on the County's [Land Disturbance Permit webpage](#). The ordinance and SOP 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 County maintains a [Code Enforcement/Property Maintenance Complaint webpage](#) and uses its public access [Citizenserve electronic web portal](#) for the submittal of concerns, complaints, or comments on any construction projects. Links are also provided on the [main page of the County's website](#) under both the Services and Residents tabs at the top of the page. If the concern is submitted via telephone or in person, staff creates a Code Case file in Citizenserve, enters the complaint/report information, and schedules any appropriate follow-up activities or inspections. It is the County's policy to respond to any complaints/concerns within 24-hours of receipt and to schedule any follow-up activities within 7 calendar days. The system allows the citizen, inspector, and supervisor to track the progress of the investigation. All information, photos, and reports are stored online in Citizenserve. Citizenserve is used to track and generate reports for all concerns submitted.

Public comment is also accepted as part of the Planning & Zoning and County Council public hearing processes for projects requiring approval of subdivision preliminary plats and conditional use permits. Planning & Zoning Commission meetings are held once/month and County Council meetings are held twice/month. Meeting dates and [agendas](#) are posted on the [County's website and meeting calendar](#). Oral and written comments are accepted and documented.

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 County's inspection requirements and procedures are outlined in code [Section 412.130, Inspections and Reports](#) and in its SOP for ESC inspections. Weekly and heavy-rain

inspections/reports are required of the operator per 412.130.B and County inspections are performed per 412.130.A. County and operator inspections are performed and documented in the County's Citizenserve permitting software system. A copy of the [inspection report](#) is available on the County's [Land Disturbance Permit](#) webpage.

Sites are prioritized for county inspection based on the following factors (in order of priority):

- ◆ Proximity to a natural watercourse/sensitive environmental feature or existing urban development/public facility and prior public comment to project (degree of public perception/acceptance),
- ◆ Size and topography of the land disturbance,
- ◆ Past performance of the developer/contractor/operators, and
- ◆ Weekly reviews (or after heavy rain events) of the required operators' self-inspection reports.

The County's enforcement authority, requirements, and procedures are as documented in code Section [412.140 Violations, Corrections and Enforcement](#) and in its Violation SOP Matrix (included in [Appendix C](#), pg. C-75). Typically, the operator is issued a Notice to Correct and given seven days to correct any insufficient BMP per 412.140.B. If the violations are not corrected within the allotted time frame, the County moves to enforcement (see 4.4.G). A Stop Work Order (SWO) can also be issued at any time during construction and development. The inspection/enforcement SOP is reviewed annually, and updates are made as needed.

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 County's enforcement authority, requirements, and procedures are as documented in code Section [412.140 Violations, Corrections and Enforcement](#) and in its SOP. A Violation SOP Matrix for enforcement procedures broken down by violation code is included in [Appendix C](#), pg. C-75. Enforcement mechanisms are as applied in the order that follows:

1. Municipal Court Citations (minor or first offenses),
2. Fines (major or repetitive offenses, degree of duration/effect on receiving water),
3. Fines & Injunctive Relief (major offenses where permittee is unresponsive),
4. Forfeiture of Performance Guaranty Funds (where permittee is unresponsive or abandoned project & site stabilization is required).

A Stop Work Order can also be issued at any time during construction and development.

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 County has ordinances in place that include a combination of non-structural and structural best management practices (BMPs) and strategies appropriate for the community to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions that include:

- ◆ Post-Construction Stormwater Management regulations for commercial sites ([Section 405.525.D, #12](#)) and subdivisions ([Section 410.410](#)) and [Design Criteria Manual](#) Section 70 (click on links to ordinances & Design Criteria Manual),
- ◆ [Chapter 405, Part 2, Article XI "FW", "FF" and "DF", Floodway, Floodway Fringe and Density Floodway Overlay Districts](#) regulates development in floodplain areas,
- ◆ [Chapter 405, Part 2, Article XII Wellhead Protection Overlay District](#),
- ◆ [Chapter 405, Part 3, Article VI, Regulations for the Protection of Natural Watercourses](#), requires preservation of certain natural watercourses and requirements for vegetative buffer setbacks,
- ◆ [Chapter 405, Part 3, Article V Wastewater Disposal](#) regulations,
- ◆ [Chapter 410.145 Tree Preservation Program For St. Charles County](#) requires the preservation of a percentage of established tree canopy in residential subdivisions with lot sizes < 5-ac.
- ◆ Various zoning ordinances in Section 405 regulate the protection of sensitive areas and preservation of open space such as the [PUD](#) (Part 2, Article X) and [Cluster Development](#) (Section 405.090.I) sections.

The Post-Construction Stormwater Management ordinances and Design Criteria were recently created/revised and adopted in December 2020. Section 70.40, Urban BMP Guidelines, of the Design Criteria manual is still in the process of being completed and it currently references and it's planned to use the Georgia Stormwater Manual for specific BMP designs. However, in order to be as flexible as possible, Section 70.30 of the manual also allows the use of BMP designs approved by other agencies and local MS4s that meet the County's design standards. The remaining ordinances referenced are available on the County's website (click on links above).

The ordinances and Design Criteria Manual are reviewed annually, and updates are made as needed.

The County's post-construction stormwater management criteria emphasizes both the assessment of site characteristics at the beginning of the construction site design phase ([Design Criteria](#) Sections 70.00.1, 70.10.1.1 & 70.10.2.1) and it offers and incentivizes the use of non-structural controls beyond the County's existing regulatory requirements to reduce the size/amount of structural controls and to ensure adequate planning for stormwater program compliance ([Design Criteria](#) Section 70.30.1).

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 County has a completed Post-Construction Ordinance in place. The Post-Construction Stormwater Management ordinance was recently revised and adopted in December 2020 (click on links to [Section 405.525.D, #12](#), [Section 410.410](#), and Section 70 [Design Criteria Manual](#)). The ordinance and Design Criteria are 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 County's Post-Construction ordinance includes requirements for the long-term preservation and maintenance of Post-Construction BMPs for commercial sites in [Section 405.525.D,#12.d\(1\)](#) and [405.525.D,#12.e](#) and for subdivision developments in [Section 410.410.C](#) and [410.460](#) and in [Design Criteria Manual](#) Section 70.20. An Agreement & Restrictions for Development & Maintenance is required to be executed and recorded by the BMP owner and a copy of that document form is included in [Appendix C](#), pg. C-79. The Agreement is required to be made a part of the subdivision restrictions/trust indentures for subdivision developments. Preservation of non-structural BMPs is legally secured on approved commercial site plans and subdivision plats per the individual ordinance requirements (see links on 4.5.A).

The County's [Section 420.020 Inspection, Maintenance and Repair of Detention Basins and Other Storm Water Management Facilities](#) ordinance details the County's inspection plan (420.020.B) and maintenance enforcement (420.020.E&F) of post-construction BMPs to ensure

all BMPs are implemented and effective. The ordinance is accessible on the County's website (click on link above). The enforcement process is reviewed annually along with the rest of the ordinance and updates are made as needed.

County SOP for scheduling facility inspections is per 420.020.B.1 and as follows:

- ◆ Bio-retention/Infiltration Facilities – six months, 1-yr, & 2-yrs after construction then a maximum of 1-yr. after any failed inspection or a maximum of 5-yrs after any passed inspection.
- ◆ Stormwater Quality Facilities – 1-yr after construction or at discretion of division then a maximum of 1-yr. after any failed inspection or a maximum of 5-yrs after any passed inspection.
- ◆ Stormwater Detention Facilities – 1-yr after construction then a maximum of 1-yr. after any failed inspection or a maximum of 5-yrs after any passed inspection.
- ◆ Policy is to schedule 3-yr inspections for a facility that passes an annual inspection after failing previous annual inspections. The facility would move to a 5-yr schedule after passing two or more subsequent periodic inspections.

County SOP for enforcement is per 420.020.E&F and as follows:

- ◆ Fines & Injunctive Relief (where maintenance issues are not resolved by HOA or property owner within established deadlines)
- ◆ Correction & Tax Lien (where maintenance issues jeopardize impacting receiving waters or public safety and are not or cannot be resolved by HOA or property owner within established deadlines)

The County uses its Citizenserve permitting software system and GIS map to track and schedule County inspections and the inspection forms are built into the program. The County maintains a [Detention Basin & Storm Water Management Facility Maintenance](#) webpage that describes the program and includes document links to the notice provided to the facility owner prior to inspection that explain maintenance requirements and include resources, inspection standards, and inspection reports used. The County also provides the owner a SWMF Orientation Packet upon approval of construction, which contains the same documents (see [Appendix A](#), pg. A-9, 4.1.C, #31). The County uses Excel spreadsheets to review BMP inventory and history of inspection results (example included in [Appendix C](#), pg. C-85).

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 County has training programs for all County operations & maintenance staff:

- ◆ Highway Department Operational Staff: Five (5) Highway maintenance facilities and the Airport facility (Smarrt Field) are regulated under industrial NPDES permits and utilize a SWPPP document written specifically for each facility's operational needs including for use as training materials and training recordkeeping. The Highway Department uses all internal training materials. Each district supervisor covers training that is specific to their facility use. The Highway Department trains O&M staff at the beginning of their employment and on an annual or as-needed basis. An example of the training covered at the Eastern Maintenance facility is included in [Appendix C](#), pg. C-166.
- ◆ Parks & Recreation: Parks O&M Staff (Brommelsiek, Indian Camp Creek, Klondike, Lindenwood, Quail Ridge, Veterans Tribute Parks) – Reviews of the facility SOP for storage and disposal of waste oil & fluids and vehicle washing are conducted annually and for each new hire by the Park Supervisor. Parks Horticulture and Natural Resource Supervisors are licensed applicators and complete training on the proper storage, labeling and usage of fertilizers, herbicides and pesticides. The Parks Horticulture and Natural Resource Supervisors provide annual training to Parks maintenance staff for pesticide & fertilizer application, safety and proper storage. If an employee misses their annual training, a make-up training date is scheduled. The training is documented on the SOP at each facility (see [Appendix C](#), pg. C-86).
- ◆ After post-construction BMP training has been provided, inspections of 50% of County facilities are conducted annually to help determine the effectiveness of County O&M staff training and adherence to the facility SWPPPs. An inspection of all County-owned post-construction stormwater management facilities (SWMFs) is performed a minimum of every five years by the Development Review Division (annually after a failed inspection occurs – see 4.5.E, pg. 19 for SWMF inspection scheduling procedures). Targeted education for proper maintenance and training is provided to facilities and staff that do not pass inspection.
- ◆ Capital Construction Projects: The Community Development Department conducts bi-annual training for all County staff and for each new hire that have responsibilities involving permitting and construction management to review regulations for new

construction, land disturbances, floodplain, and other state & federal environmental regulation (see [Appendix C](#), page C-90 for a copy of the PowerPoint document used for training). The County was also issued and complies with MDNR Land Disturbance Permit MOR100036 for use on County construction projects.

The County's training programs coordinate with all other MCMs as follows:

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

The Director of the County Airport (Smartt Field) is responsible for administering its industrial NPDES permit (MOR80F024) and the County contracts with a private vendor to provide monitoring/sampling that is required by the industrial permit; otherwise, monitoring, integrated planning, and TMDL implementations are not applicable at this time. However, if monitoring, integrated planning, or TMDL implementations become applicable, descriptions of how the County's training program will coordinate with them will be incorporated into the SWMP and noted in the County's annual report. The County's training program is reviewed annually and modified as new, updated material becomes available or as the needs of the County 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.

A list of County operations/facilities impacted by the County's operation and maintenance program is included in [Appendix B](#), pg. B-3. The list is broken down by Facility/Operation Type, Responsible Dept/Staff, and Address/Location.

The County's list of facilities is reviewed and reconciled 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.

A list of six (6) County-owned and operated facilities subject to industrial NPDES permits is included in [Appendix B](#), pg. B-3. The operation & maintenance for these facilities is the

responsibility of the County Highway Department (including the Airport facility). The list is broken down by Facility, Address/Location, Responsible Staff, and NPDES Permit #. The County's list of facilities is reviewed and reconciled annually and updated as needed. The County does not have any facilities with No Exposure Exemption Certifications.

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.

The County maintains controls for all County operations & maintenance facilities:

- ◆ Highway Maintenance Facilities & Airport (Smartt Field): The Airport and five (5) of the Highway Maintenance Facilities are subject to industrial NPDES permits and are regulated under those individual permits. All Highway Maintenance Facilities (including the Airport facility) utilize a SWPPP document written specifically for each facility's operational needs.
- ◆ Highway Department – Weldon Spring Storage Facility: This facility utilizes the SWPPP established for the Highway Department Central Maintenance Facility, NPDES Permit # MOR80C413 (see Section 5 of the SWPPP in [Appendix C](#), pg. C-149).
- ◆ County Streets & Storm Sewers: The Highway Department provides semi-annual street sweeping of all public curb & gutter streets that are maintained by the County (see [Appendix A](#), pg. A-16, 4.6.E, #5A). The Highway Department also provides storm sewer inspection and cleaning on an as needed/complaint basis. All material from sweeping, sewer cleaning, site cleanup is disposed of in dumpsters and hauled off by local trash haulers (see 4.6.F).
- ◆ County Parks & Parks O&M Facilities:
 - Parks with O&M (Brommelsiek, Indian Camp Creek, Klondike, Lindenwood, Quail Ridge, Veterans Tribute Parks) – O&M includes basic maintenance (such as oil changes) on Park vehicles/equipment inside Park facilities, outdoor storage and disposal of waste oil, and outdoor vehicle washing. Parks uses SOP that is posted at each facility (see [Appendix C](#), pg. C-86).
 - Remaining Parks fleet vehicles, one ton and under, are serviced at a private facility by a vendor under contract with the County.
 - Parks Horticulture and Natural Resource Supervisors are licensed applicators and complete training on the proper storage, labeling and usage of fertilizers, herbicides and pesticides. Parks maintains multiple staff as trained and licensed pesticide applicators who are responsible for application of pesticides.
 - County Parks have regional retention basins and SWMFs that manage stormwater & debris.
- ◆ Co Administration Facilities:
 - County fleet vehicles and equipment are serviced at local, private maintenance facilities under contract with the County. There is no outside storage of materials.
 - County facility grounds are inspected & cleaned on a daily-weekly basis and as appropriate by Facilities Management staff to reduce or eliminate the discharge of floatables and pollutants from County parking lots & properties, storage yards,

fueling stations, and open space. Facilities Management maintains commercial dumpsters at each facility. All dumpsters are maintained in good condition to prevent leakage or are replaced.

- County fleet fueling facilities at Third Street, Pet Adoption Center, and Police/EOC have fuel spill kits available and are clearly identified with instructions for spill remediation and contact information for clean-up by Facilities Management staff.
- As part of the facility self-inspection program detailed in 4.6.A, all storm sewer inlets shall be inspected. Storm inlets that are not identified will be marked with a placard stating, “No Dumping – Drains To Stream.”
- Certain County facilities have SWMFs that manage stormwater & debris. These facilities are tracked and inspected as part of the County’s SWMF maintenance inspection program explained in 4.5.E, pg. 18.
- ◆ County Recycling Centers conduct recycling operations indoors. Containers are made available for materials to be dropped off before hauling to be processed.
- ◆ Police Department/Emergency Operations Center (PD/EOC): The County contracts with a private company to service all PD/EOC large trucks, boat, and generators in the County garages on the PD/EOC property. The service areas drain to a grease/oil separator and sanitary sewer disposal system. The PD/EOC site has SWMFs that manage stormwater & debris. These facilities are tracked and inspected as part of the County’s SWMF maintenance inspection program explained in 4.5.E, pg. 18.
- ◆ Family Arena: Maintenance staff cleans up any trash on the parking lot & grounds and disposes of it in the facility compactor immediately after every event.

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.

- ◆ Highway Maintenance Facilities & Airport (Smartt Field): The Airport and five (5) of the Highway Maintenance Facilities are subject to industrial NPDES permits and are regulated under those individual permits. All Highway Maintenance Facilities (including the Airport facility) utilize a SWPPP document written specifically for each facility’s operational needs to apply maintenance procedures, maintenance schedules, and long-term inspection schedules for controls to reduce floatables and other pollutants to the permittee’s regulated MS4.
- ◆ Highway Department – Weldon Spring Storage Facility: This facility utilizes the SWPPP established for the Highway Department Central Maintenance Facility, NPDES Permit # MOR80C413 (see Section 6 of the SWPPP in [Appendix C](#), pg. C-152).
- ◆ County Streets & Storm Sewers: The Highway Department provides semi-annual street sweeping of all public curb & gutter streets that are maintained by the County (see [Appendix A](#), pg. A-16, 4.6.E, #5A). The Highway Department also provides storm sewer inspection and cleaning on an as needed/complaint basis. All material from sweeping, sewer cleaning, site cleanup is disposed of in dumpsters and hauled off by local trash haulers (see 4.6.F).
- ◆ Parks facilities with O&M (Brommelsiek, Indian Camp Creek, Klondike, Lindenwood, Quail Ridge, Veterans Tribute Parks) use SOP that is posted at each facility (see [Appendix C](#), pg. C-86).

- ◆ Spill kits at fleet fueling facilities at Third Street, the Pet Adoption Center, and Police/EOC are inspected/replaced a minimum of twice per year.
- ◆ Inspections of 50% of County facilities are conducted annually and an inspection of all County-owned post-construction SWMFs are performed a minimum of every five years by the Development Review Division (annually after a failed inspection occurs – see 4.5.E, pg. 19 for SWMF inspection scheduling procedures). Education for proper maintenance and training is provided to facilities and staff that do not pass inspection. As part of the facility self-inspection program, all storm sewer inlets shall be inspected. Inlets that are not identified will be marked with a placard stating, “No Dumping – Drains To Stream.”

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 Highway facilities storing waste removed from separate storm sewers and areas of jurisdiction are regulated under industrial NPDES permits and use the Highway Department SWPPP for specific SOP for disposing of waste material. All material from sweeping, sewer cleaning, and site cleanup is disposed of in dumpsters and hauled off by local trash haulers. Environmental Health & Protection hauls illegally dumped waste to the St. Peters transfer station for disposal. County Recycling Centers conduct recycling operations indoors.

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.

- ◆ Airport (Smarrt Field) facility is regulated under an industrial NPDES permit and utilizes a SWPPP for SOP regarding the washing of vehicles and equipment.
- ◆ Highway Department maintenance facilities are regulated under industrial NPDES permits and utilize the Highway Department SWPPP for SOP regarding the washing of County vehicles and equipment. SWPPP allows for 500 gals/day for truck washing, no soap, only water. Water allotted cannot be saved to use on another day. All vehicle and equipment maintenance are conducted indoors where all sumps drain to a waste collection system that is regularly maintained/serviced by a private contractor. Vehicle & equipment washing does not occur at the Highway Department – Weldon Spring Storage Facility.
- ◆ Parks facilities with O&M (Brommelsiek, Indian Camp Creek, Klondike, Lindenwood, Quail Ridge, Veterans Tribute Parks) wash vehicles and equipment outside with water only. The wash areas are protected with vegetated buffer strips (no connection to storm sewer). See [Appendix C](#), pg. C-86 for SOP.

- ◆ Police/EOC facility washes vehicles and equipment inside with water only. The wash areas drain to a separator and sanitary sewer disposal system.

All other County fleet vehicles and equipment are washed at local, private wash facilities under contract with the County.

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.

- ◆ All Highway maintenance facilities (including the Airport) are regulated under industrial NPDES permits and utilize a SWPPP written specifically for each facility as SOP for the storage of all paints, solvents, petroleum products and petroleum waste products (except fuels) so that these materials are not exposed to stormwater. All storage of County Highway materials is inside/covered.
- ◆ Highway Department – Weldon Spring Storage Facility: All storage of any paints, solvents, petroleum products and petroleum waste products (except fuels) is inside. Spill prevention & control is addressed in the SWPPP established for the Highway Department Central Maintenance Facility, NPDES Permit # MOR80C413 (see Section 5 of the SWPPP in [Appendix C](#), pg. C-149).
- ◆ Parks facilities with O&M (Brommelsiek, Indian Camp Creek, Klondike, Lindenwood, Quail Ridge, Veterans Tribute Parks): Paints, solvents, petroleum products are stored inside and in a fire safe lockers with the exception of bulk oil that is stored in 55 gallon sealed, covered containers with solid tops and two inch screw caps. Parks stores the 55 gallon sealed, covered barrels with used oil outside of the facilities on level pavement. No more than 2 barrels are stored at any given time. Waste oil is currently processed with oil dry and discarded by putting it into trash bags and then into trash dumpsters. Parks is currently reviewing contracting with an oil recycling contractor to dispose of all waste oil and SOP shall be updated if/when that occurs. See [Appendix C](#), pg. C-86 for SOP.
- ◆ There is no storage of materials at any other County facilities that would have exposure to stormwater.

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 County does not have new flood management projects and it does not have capital funds programmed for new flood management projects. The County participates in the FEMA Community Rating System and all flood buy-out properties are preserved and restricted in use. WQ design would be required for any public or private project that disturbs > 1-ac of land per

[Sec 405.525.D, #12](#) and [410.410.D](#) of the County ordinances and Section 70.10.1 in the [Design Criteria Manual](#).

APPENDICES

- Appendix A:** Measurable Goals, BMP Evaluation & Iterative Process
- Appendix B:** MCM Contacts & County Facilities Lists
- Appendix C:** SOP & Supplemental Documents