

Permit Section	BMP Description	BMP Purpose	Responsible Person (optional - only if multiple people on MS4 team)	Goal/Expected Result of BMP	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	BMP Evaluation	BMP Success/Modification
					Permit Year 1	Permit Year 2	Permit Year 3	Permit Year 4	Permit Year 5		
MCM1 4.1.A	1 County Residents										
MCM1 4.1.B	1 Common residential storm water pollutants: grass-clippings & leaf litter, fertilizers & pesticides, pet waste, household hazardous waste, solid & petroleum based waste, failing septic systems	Educate residents about how improper lawn care, property management and usage activities can lead to pollutants in runoff, trash, waste & floatables, erosion and sediment runoff.	*St Charles Co SWCD *Environmental Health *Parks *Development Review *Building Code Enforcement	Behavioral change, increased public involvement & decreased pollutants	Review list of common pollutants annually (January)	Review list of common pollutants annually (January)	Review list of common pollutants annually (January)	Review list of common pollutants annually (January)	Review list of common pollutants annually (January)	Annual Reviews: Stormwater, Illicit Discharge, Solid Waste-Illegal Dumping Complaints, Pet Waste complaints with Humane Services/Pet Parks Supervisors, Highway Street Sweeping & Storm Sewer Cleaning Reports.	Add/remove target pollutant & source if the metrics show that a new pollutant is becoming an enforcement problem or vice versa
MCM1 4.1.C	1 Mission Clean Stream: The County participates in the annual Clean stream event organized by the Greenway Network. Environmental Health supplies a loader truck & equipment to remove & dispose of heavy items at their facilities from the Cora Island site. SWCD provides an Event Display: Urban SW demonstration for residents using Enviroscene or rain table.	Create public involvement, provide resources to remove solid waste from Co streams & waterbodies, and educate public	Deborah Christensen, Environmental Health Theresa Strunk, St Charles Co SWCD	Behavioral & environmental change, increased public involvement, and decreased pollutants	*amount material removed Cora Island (goal - 2,000 lbs) *amount material removed Countywide (goal - 5 tons) # handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	*amount material removed Cora Island (goal - 2,000 lbs) *amount material removed Countywide (goal - 5 tons) # handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	*amount material removed Cora Island (goal - 2,000 lbs) *amount material removed Countywide (goal - 5 tons) # handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	*amount material removed Cora Island (goal - 2,000 lbs) *amount material removed Countywide (goal - 5 tons) # handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	*amount material removed Cora Island (goal - 2,000 lbs) *amount material removed Countywide (goal - 5 tons) # handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement & level or decreasing debris removal between reporting periods indicates successful outreach.	
MCM1 4.1.C	2 Race for the Rivers annual festival (and canoe race) at St. Charles Riverfront - Event Display: Urban SW demonstration for residents using Enviroscene or rain table & educational handouts ( <i>Where Does Your Water Shed? &amp; Homeowners Have Important Role in Soil and Water Conservation</i> )	Create public involvement & educate public on their role in protecting clean water resources	Theresa Strunk, St Charles Co SWCD	Behavioral & environmental change & increased public involvement	# handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	# handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	# handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	# handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	# handouts distributed (goal - 25) # sign-ups to newsletter, the Reporter (goal-5)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement between reporting periods indicates successful outreach.	
MCM1 4.1.C	3 Landowner SW & Erosion Control Technical Assistance (office/phone/email) & Site Visits	Provide education, advice, and professional services contact information regarding erosion, stormwater, & property management issues	Frankie Coleman, St Charles Co SWCD Rich Gnecco, Development Review	Behavioral & environmental change, provide environmentally responsible solutions to protect property & watercourses	*Develop promotional & contact information online on both Co & SWCD websites (goal - June 2022) # outreach/assistance visits (goal-5 urban, 40 ag) # outreach contacts (phone/email) (goal-10 urban, 20 ag)	# outreach/assistance visits (goal-5 urban, 40 ag) # outreach contacts (phone/email) (goal-10 urban, 20 ag)	# outreach/assistance visits (goal-5 urban, 40 ag) # outreach contacts (phone/email) (goal-10 urban, 20 ag)	# outreach/assistance visits (goal-5 urban, 40 ag) # outreach contacts (phone/email) (goal-10 urban, 20 ag)	# outreach/assistance visits (goal-5 urban, 40 ag) # outreach contacts (phone/email) (goal-10 urban, 20 ag)	Review annual metrics, trends between reporting periods, & permitting records to determine if action was taken by landowner to measure success of outreach. Meeting annual goals & landowner permitting action indicates successful outreach.	

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MCM1 4.1.C	4 <a href="#">Recycle Works drop-off centers: facilities to collect &amp; dispose of material, including antifreeze, motor oil, household hazardous waste, electronics, plastic, glass, metal, paper and appliances.</a>	Provide resources to collect, dispose & recycle residential waste materials thereby diverting their disposal from MS4/waste stream	Deborah Christensen, Environmental Health	Increased public involvement & decreased pollutants	weight of collected material (lbs) - (goal - 1.5 million lbs)	weight of collected material (lbs) - (goal - 1.5 million lbs)	weight of collected material (lbs) - (goal - 1.5 million lbs)	weight of collected material (lbs) - (goal - 1.5 million lbs)	weight of collected material (lbs) - (goal - 1.5 million lbs)	Review annual metrics & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing waste removal between reporting periods indicates successful outreach.	
MCM1 4.1.C	5 Educational handouts & items (made from recycled materials) promoting Co recycling centers & waste disposal services distributed throughout the year & at all events with Environmental Health displays.	Promotion & educate residents about stormwater pollution, recycling, household hazardous waste & recycling opportunities available at the two Co recycling centers	Deborah Christensen, Environmental Health	Behavioral change, increased public involvement, decreased pollutants	# distributed annually (goal - 1,000)	# distributed annually (goal - 1,000)	# distributed annually (goal - 1,000)	# distributed annually (goal - 1,000)	# distributed annually (goal - 1,000)	Review annual goals & trends between reporting periods & 4.1.C, #4 metrics to measure success of outreach. Meeting annual goals & level or increasing promotional distribution & waste removal between reporting periods indicates successful outreach.	
MCM1 4.1.C	6 Event Display - Earth Day (annual celebration at both recycling centers, providing free trees, educational handouts/promotional items for the public)	Promote recycling opportunities at both recycling centers & public involvement	Deborah Christensen & Ryan Tilley, Environmental Health	Behavioral & environmental change, increased public involvement	# trees distributed (goal - 200)	# trees distributed (goal - 200)	# trees distributed (goal - 200)	# trees distributed (goal - 200)	# trees distributed (goal - 200)	Review annual goals, trends between reporting periods & 4.1.C, #4 metrics to measure success of outreach. Meeting annual goals & level or increasing promotional distribution & waste removal between reporting periods indicates successful outreach.	
MCM1 4.1.C	7 <a href="#">Environmental Health &amp; Protection Webpage (including a webpage dedicated to Water Quality) and Social Media Campaign</a>	Promote recycling opportunities at both recycling centers & provide education & resources for Water Quality	Deborah Christensen, Environmental Health	Behavioral & environmental change, Increased public involvement	# Environmental Division webpage hits (goal - 3,000) # social media hits (goal - 20K)	# Environmental Division webpage hits (goal - 3,000) # social media hits (goal - 20K)	# Environmental Division webpage hits (goal - 3,000) # social media hits (goal - 20K)	# Environmental Division webpage hits (goal - 3,000) # social media hits (goal - 20K)	# Environmental Division webpage hits (goal - 3,000) # social media hits (goal - 20K)	Review annual metrics, trends between reporting periods & 4.1.C, #4 metrics to measure success of outreach. Meeting annual goals & level or increasing promotional distribution & waste removal between reporting periods indicates successful outreach.	
MCM1 4.1.C	8 Publication of Press Releases: Including but not limited to Christmas tree recycling opportunities, household hazardous waste collection event at Co recycling centers, and promotion of recycling at Co recycling centers	Promote recycling opportunities at both recycling centers & provide public involvement	Deborah Christensen, Environmental Health	Behavioral & environmental change, Increased public involvement	# press releases (goal-3) # participants in press release event (goal varies by event but review trend in program attendance annually)	# press releases (goal-3) # participants in press release event (goal varies by event but review trend in program attendance annually)	# press releases (goal-3) # participants in press release event (goal varies by event but review trend in program attendance annually)	# press releases (goal-3) # participants in press release event (goal varies by event but review trend in program attendance annually)	# press releases (goal-3) # participants in press release event (goal varies by event but review trend in program attendance annually)	Review annual goals, trends between reporting periods & 4.1.C, #4 metrics to measure success of outreach. Meeting annual goals & level or increasing promotional distribution & waste removal between reporting periods indicates successful outreach.	

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MCM1 4.1.C	9 Door-hangers & Storm drain Marking in IDDE Hotspots (place placard identifying storm sewer inlets stating <i>No Dumping - Drains to Stream</i> ): Deliver educational door-hangers to each resident in watershed area or subdivision block where ID occurs & mark existing storm drains if appropriate - see MCM3, 4.3.D, # 4.	To educate residents to eliminate pollutants discharged into the MS4, provide resources for reporting IDs & disposing of waste, & clearly identify older storm sewer inlets	Rich Gnecco, Development Review	Behavioral change, increased public involvement & decreased pollutants	# door-hangers delivered # storm drains marked	# door-hangers delivered # storm drains marked	# door-hangers delivered # storm drains marked	# door-hangers delivered # storm drains marked	# door-hangers delivered # storm drains marked	Review annual metrics & compare to ID complaint metrics. Reduction in IDs in hotspot areas indicates successful outreach	
MCM1 4.1.C	10 <a href="https://www.sccmo.org/1389/Applications-and-Resources">Illegal Dumping Identification Program (https://www.sccmo.org/1389/Applications-and-Resources)</a> & <a href="#">Solid Waste Management Webpage: offering resources for proper disposal of household waste &amp; yard waste and method for filing complaints</a>	Allow citizens to aid local enforcement authorities in the identification of polluters & provide information for available waste disposal/recycling facilities	Deborah Christensen, Environmental Health	Increased public involvement & decreased pollutants	*weight of illegally dumped waste removed # complaints/cases logged	*weight of illegally dumped waste removed # complaints/cases logged	*weight of illegally dumped waste removed # complaints/cases logged	*weight of illegally dumped waste removed # complaints/cases logged	*weight of illegally dumped waste removed # complaints/cases logged	Review annual metrics, trends between reporting periods, and 4.1.C, #1 & 4 metrics to measure success of outreach. Level or decreasing complaints & illegal waste removal & level or increased overall waste collection between reporting periods indicates successful outreach.	
MCM1 4.1.C	11 <a href="#">Park Education and Enhancement Projects - Nature Walks at Towne Park, New Melle Park, Klondike and Veteran's Tribute Park</a>	The public is invited to join Parks staff for a nature walk and learn about the history of Co parks, natural resources, rain gardens, special nature events, and answer any questions	John "Chuck" Collins, Parks	Behavioral change & increased public involvement	# participants (goal - 700)	# participants (goal - 750)	# participants (goal - 800)	# participants (goal - 800)	# participants (goal - 800)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement between reporting periods indicates successful involvement.	
MCM1 4.1.C	12 <a href="#">Park Education and Enhancement Projects - The Ag. Center Broemmelsiek Park (volunteer program, including at-risk youth groups, to help maintain the garden and assist staff with the various plants, trees and shrubs)</a>	Involve public in the maintenance of Co Parks to restore native landscape	John "Chuck" Collins, Parks	Increased public involvement, improved water quality	# volunteer hours (goal - 100 hours)	# volunteer hours (goal - 100 hours)	# volunteer hours (goal - 100 hours)	# volunteer hours (goal - 100 hours)	# volunteer hours (goal - 100 hours)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement between reporting periods indicates successful involvement.	
MCM1 4.1.C	13 Park Education and Enhancement Projects - Missouri Master Naturalists, Confluence Chapter volunteer program	Involve public in the maintenance of Co Parks to restore native landscape	John "Chuck" Collins, Parks	Increased public involvement, improved water quality	# volunteer hours (goal - 400)	# volunteer hours (goal - 400)	# volunteer hours (goal - 400)	# volunteer hours (goal - 400)	# volunteer hours (goal - 400)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement between reporting periods indicates successful involvement.	





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MCM1 4.1.B	2 Understanding watershed concept & effects of common residential storm water pollutants: grass-clippings & leaf litter, fertilizers & pesticides, pet waste, household hazardous waste, solid & petroleum based waste.	Provide education to the County's young residents about stormwater and the impacts that can effect the quality of water to alter & guide behavior that helps sustain and protect the quality of Co streams and waterbodies	*St Charles Co SWCD *Environmental Health *Parks	Behavioral change, increased public involvement & decreased pollutants							
MCM1 4.1.C	19 Presentations and outreach addressing stormwater, soil erosion, & water quality to County Schools (K-12) and youth groups (including girl & boy scout groups): A "Stormwater Superhero" or other age appropriate certification is awarded to students that access the County's SW webpage after the outreach to measure the importance of outreach to the participants and to cross-promote website.	Understanding watershed concept, impacts of pollution, & how residents can help	Theresa Strunk, St. Charles Co SWCD	Behavioral & environmental change, increased public involvement, & decreased pollutants	# of contacts (goal -180) # presentations per year (goal-6) # students awarded certification (goal 15)	# of contacts (goal -180) # presentations per year (goal-6) # students awarded certification (goal 30)	# of contacts (goal -180) # presentations per year (goal-6) # students awarded certification (goal 30)	# of contacts (goal -180) # presentations per year (goal-6) # students awarded certification (goal 45)	# of contacts (goal -180) # presentations per year (goal-6) # students awarded certification (goal 60)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement & award certification between reporting periods indicates successful outreach.	
MCM1 4.1.C	20 <a href="#">Conservation Education Library: Resources for educators &amp; public to use for education &amp; outreach to youth groups housing Rain Table &amp; Enviroescape interactive displays, age-specific workbooks, activity books, &amp; literature.</a>	To provide conservation resources for educational partners to use as outreach to young Co residents	Theresa Strunk, St. Charles Co SWCD	Behavioral & environmental change, increased public involvement, & decreased pollutants	*Promote List of Publications on SWCD website (goal date 12-31-2021) # resources distributed (goal - 10) # organizations requested/served (goal - 5)	# resources distributed (goal - 10) # organizations requested/served (goal - 5)	# resources distributed (goal - 10) # organizations requested/served (goal - 5)	# resources distributed (goal - 10) # organizations requested/served (goal - 5)	# resources distributed (goal - 10) # organizations requested/served (goal - 5)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement between reporting periods indicates successful outreach.	
MCM1 4.1.C	21 <a href="#">Environmental Education Program - Regional Envirothon (Annual high school environmental competition held annually in April): SWCD promotes, organizes, staffs, and facilitates the event.</a>	Encourage youth participation with managing real-world environmental problems and solutions	Theresa Strunk, St. Charles Co SWCD	Behavioral & environmental change, increased public involvement	# Teams & students/coaches participating (goal -4 teams, 24 students/coaches) # Volunteers (goal-20)	# Teams & students/coaches participating (goal -4 teams, 24 students/coaches) # Volunteers (goal-20)	# Teams & students/coaches participating (goal -4 teams, 24 students/coaches) # Volunteers (goal-20)	# Teams & students/coaches participating (goal -4 teams, 24 students/coaches) # Volunteers (goal-20)	# Teams & students/coaches participating (goal -4 teams, 24 students/coaches) # Volunteers (goal-20)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement between reporting periods indicates successful outreach.	
MCM1 4.1.C	22 Conservation Stewardship Poster Contest and Display: For 4th grade students with rotating topics including water, soil, forestry, pollinators. Sponsored by NACD, posters are judged & awards presented on a national level. SWCD organizes, promotes, and administers the local event. Winning posters are displayed in Co Administration Building lobby and are posted on County's SW webpage & SWCD website for 30-days.	Encourage youth education & involvement with stormwater & conservation issues & promote Co SW & SWCD websites	Theresa Strunk, St. Charles Co SWCD	Behavioral change & Increased public involvement	# participants (goal-30) # Co SW & SWCD webpage hits during display period (goal-25)	# participants (goal-30) # Co SW & SWCD webpage hits during display period (goal-25)	# participants (goal-30) # Co SW & SWCD webpage hits during display period (goal-25)	# participants (goal-30) # Co SW & SWCD webpage hits during display period (goal-25)	# participants (goal-30) # Co SW & SWCD webpage hits during display period (goal-25)	Review annual goals, trends between reporting periods, & compare webpage hits to average monthly webpage hits to measure success of outreach. Meeting annual goals , level or increasing involvement between reporting periods, & increased website hits during display period indicates successful outreach.	

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MCM1 4.1.C	23 <a href="#">Environmental Education Programs &amp; Recycling Centers Tours: (link to webpage for list of specific programs)</a>	Encourage youth education & involvement with stormwater issues	Deborah Christensen, Environmental Health	Behavioral & environmental change, increased public involvement, & decreased pollutants	# presentations/tours (goal-5) # individuals served (goal-100)	# presentations/tours (goal-5) # individuals served (goal-100)	# presentations/tours (goal-5) # individuals served (goal-100)	# presentations/tours (goal-5) # individuals served (goal-100)	# presentations/tours (goal-5) # individuals served (goal-100)	Review annual goals, trends between reporting periods & 4.1.C, #4 metrics to measure success of outreach. Meeting annual goals & level or increasing promotional distribution & waste removal between reporting periods indicates successful outreach.	
MCM1 4.1.C	24 <a href="#">Parks Educational Sites &amp; Outreach Programs - Park Explorer Kids Club &amp; School Field Trip Program, Eco Playground at Indian Camp Creek, and area's only Certified Nature Explore Classroom at Towne Park - Educational parks, programs, and activities presented to school-aged participants including Wildflowers of the Prairie, Macro invertebrate ID, Birds of the Parks, Wild Mammals, Fishing, Tree identification, Streams. Park sites &amp; programs are promoted on webpage.</a>	Encourage youth education & involvement with conservation & stormwater issues	John "Chuck" Collins, Parks	Behavioral change & Increased public involvement	# participants (goal-150)	# participants (goal-150)	# participants (goal-200)	# participants (goal-200)	# participants (goal-200)	Review annual goals & trends between reporting periods to measure success of outreach. Meeting annual goals & level or increasing involvement between reporting periods indicates successful outreach.	
MCM1 4.1.C	25	Miscellaneous Programs (to report on programs that were completed but are not a part of the SWMP)									
MCM1 4.1.A	3	Development Stakeholders – (Developers, Engineers, Contractors, Builders)									
MCM1 4.1.B	3	Sediment runoff, litter & trash, chemicals, petroleum & vehicular fluids	Development Review	Prevent improperly managed & maintained land disturbance and development sites that can lead to sediment runoff, chemical/toxics spills, petroleum & vehicular fluids, trash, waste, & floatables leaving the site, erosion, flooding, and property damage.	Reduction in sediment runoff, pollutant load & enforcement violations on construction site projects						







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MCM1 4.1.A	5 County Staff: (maintenance staff of Highway, Airport, Facilities, Parks, Family Arena facilities)										
MCM1 4.1.B	5 Sediment runoff, fertilizer & pesticides, litter & trash, de-icing/rock salt (usage & storage), petroleum & vehicular fluids, chemicals/paint (usage & storage), wash water	Prevent improperly maintained facilities and SW BMPs, improper material storage & use that can lead to sediment runoff, chemical, petroleum & vehicular fluids, toxics spills & discharges, and trash, waste, & floatables leaving the site	*Highway Dept *Facilities *Parks *PD/EOC *Development Review								
MCM1 4.1.C	35 Annual training for Co maintenance staff per Section 4.6.A	Educate Co staff about application, storage & disposal of pollutants & maintenance of BMPs to reduce target pollutants in runoff from Co facilities	John Lyons, Highway Dennis Green, Parks	Behavioral change, decreased pollutants	# Highway Dept O&M staff trained/# Hwy O&M staff # Parks maintenance staff trained/# Parks maintenance staff	# Highway Dept O&M staff trained/# Hwy O&M staff # Parks maintenance staff trained/# Parks maintenance staff	# Highway Dept O&M staff trained/# Hwy O&M staff # Parks maintenance staff trained/# Parks maintenance staff	# Highway Dept O&M staff trained/# Hwy O&M staff # Parks maintenance staff trained/# Parks maintenance staff	# Highway Dept O&M staff trained/# Hwy O&M staff # Parks maintenance staff trained/# Parks maintenance staff	Review annual goals & failing results of 4.1.C, #36 to measure success of outreach. Training 100% of O&M staff annually and level or decrease in facilities failing inspection indicates successful outreach.	
MCM1 4.1.C	36 Self-inspection of 50% of County facilities annually	Ensure that Co facilities are compliant with SWMP & staff training is effective	Rich Gnecco, Development Review	Behavioral change, decreased pollutants	# Facilities Inspected (goal - 50% annually) % failing (goal - downward trend)	# Facilities Inspected (goal - 50% annually) % failing (goal - downward trend)	# Facilities Inspected (goal - 50% annually) % failing (goal - downward trend)	# Facilities Inspected (goal - 50% annually) % failing (goal - downward trend)	# Facilities Inspected (goal - 50% annually) % failing (goal - downward trend)	Review annual goals & trends between reporting periods to measure success of outreach. Level or decreasing failing inspections between reporting periods indicates effective O&M training.	
MCM1 4.1.C	37 <a href="#">Bi-annual training for Co staff involved in capital construction projects to review environmental permitting requirements, development regulations, &amp; Co SOP (see Appendix C, pg. C-85 for training docs)</a>	Ensure that Co staff is compliant with environmental regulations & Co SWMP	Rich Gnecco & Robert Myers, Community Development	Behavioral change, increased regulatory compliance on Co projects, decreased pollutants	*Completion of training # NTC/NOVs issued on Co projects (goal ≤ 5)	# NTC/NOVs issued on Co projects (goal ≤ 3)	*Completion of training # NTC/NOVs issued on Co projects (goal ≤ 2)	# NTC/NOVs issued on Co projects (goal ≤ 2)	*Completion of training # NTC/NOVs issued on Co projects (goal ≤ 2)	Review annual goals & trends between reporting periods to measure success of outreach. Level or decreasing NTCs/NOVs on Co projects between reporting periods indicates successful outreach.	

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MCM1 4.1.C	38 Miscellaneous Programs (to report on programs that were completed but are not a part of the SWMP)										
MCM1 4.1.A	6 Agricultural Stakeholders										
MCM1 4.1.B	6 Sediment runoff, chemicals (fertilizers & pesticides), animal waste	Provide agricultural outreach & programs to improve soil conservation features to reduce erosion, soil loss, sediment runoff, and chemical (fertilizer & pesticide), animal waste in runoff	St. Charles Co SWCD								
MCM1 4.1.C	39 <a href="#">St. Charles County SWCD website providing landowner assistance, local projects and links for practices, programs and resources available for addressing erosion, soil conservation, and controlling pollutants</a>	Provide programs, resources and outreach to agricultural stakeholders to reduce erosion and pollutants in agricultural runoff	Frankie Coleman, St. Charles Co SWCD	Behavioral & environmental change, increased public involvement, decreased pollutants	# website hits (goal-400) # program applications (goal-25)	# website hits (goal-400) # program applications (goal-25)	# website hits (goal-400) # program applications (goal-25)	# website hits (goal-400) # program applications (goal-25)	# website hits (goal-400) # program applications (goal-25)	Review annual goals & trends between reporting periods to measure success of outreach. Level or increasing website activity & application for programs between reporting periods indicates effective outreach.	
MCM1 4.1.C	40 <a href="#">Publish SWCD Newsletter, the Reporter: Features natural resource conservation news and information with focus on soil &amp; water topics, stormwater, recycling, best management practices &amp; more</a>	Inform large landowners of cost-share opportunities to control stormwater runoff and provide information and education on soil & water topics	Theresa Strunk, St. Charles Co SWCD	Behavioral & environmental change, increased public involvement, decreased pollutants	# issues published annually (goal-4 ) # issues distributed annually (goal - 2900)	# issues published annually (goal-4 ) # issues distributed annually (goal - 2900)	# issues published annually (goal-4 ) # issues distributed annually (goal - 2900)	# issues published annually (goal-4 ) # issues distributed annually (goal - 2900)	# issues published annually (goal-4 ) # issues distributed annually (goal - 2900)	Review annual goals & trends between reporting periods to measure success of outreach. Level or increasing distribution amounts between reporting periods indicates effective outreach.	
MCM1 4.1.C	41 State & Federal Programs Workshops: Topics vary but typically include Highly Erodible Land compliance, practices to prevent erosion, cover crops, rotational grazing, animal waste. An evaluation form is filled out by participants after completion of the program.	Inform agricultural stakeholders of programs available to reduce erosion and pollutants in agricultural runoff	Frankie Coleman, St. Charles Co SWCD NRCS Staff	Behavioral & environmental change, increased public involvement, decrease erosion, decreased pollutant discharge	*Hold Workshop (goal-1 bi-annually) # participants (goal - 10 bi-annually) # program applications (goal-25)	*Organize 2023 Workshop # program applications (goal-25)	*Hold Workshop (goal-1 bi-annually) # participants (goal - 10 bi-annually) # program applications (goal-25)	*Organize 2025 Workshop # program applications (goal-25)	*Hold Workshop (goal-1 bi-annually) # participants (goal - 10 bi-annually) # program applications (goal-25)	Review bi-annual goals, trends between reporting periods & program evaluation forms to measure success of outreach. Level or increasing participation & application for programs between reporting periods & positive evaluations indicate effective outreach.	





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					Permit Year 1	Permit Year 2	Permit Year 3	Permit Year 4	Permit Year 5		
MCM3 4.3.A	1 <a href="#">The County's storm sewer systems and outfalls are located and maintained on the County's GIS map. Municipal storm sewer system information is also available as provided by MS4s.</a>	To easily identify MS4 locations, outfalls to private SWMFs, WOTS, and WOTUS, and access design information.	Rich Gnecco, Development Review	Efficiently locate inlet and outfall to address IDDE	SOP review with GIS (Jan)	SOP review with GIS (Jan)	SOP review with GIS (Jan)	SOP review with GIS (Jan)	SOP review with GIS (Jan)	Annual review of SOP with GIS staff to improve process	
MCM3 4.3.B	2A <a href="#">The County has a completed Illicit Discharge Ordinance in place, Chapter 422 Illicit Discharge and Connection Regulations</a>	Effectively prohibit, unauthorized non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures	Jared Agee, BCE	Environmental change & decreased pollutants	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Annual review of program SOP & ordinance language to determine if ordinance prohibits effective enforcement	
MCM3 4.3.B	2B <a href="#">The County has an ordinance to address illegal dumping of solid waste in Chapter 240, Solid Waste Management Code</a>	Effectively prohibit, unauthorized non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures	Ryan Tilley, Environmental Health	Environmental change & decreased pollutants	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Annual review of program SOP & ordinance language to determine if ordinance prohibits effective enforcement	
MCM3 4.3.C	3A <a href="#">The County uses Chapter 422 Illicit Discharge and Connection Regulations and it currently refers to the City of O'Fallon's SOP (see Appendix C, pg. C-2)</a>	Effectively prohibit, unauthorized non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures	Jared Agee, BCE	Environmental change & decreased pollutants	*Revise O'Fallon IDDE SOP document for use as County IDDE SOP (goal-12-31-21) *# IDDE Cases *# IDs removed *Ordinance/SOP review (Jan)	*# IDDE Cases *# IDs removed *Ordinance/SOP review (Jan)	*# IDDE Cases *# IDs removed *Ordinance/SOP review (Jan)	*# IDDE Cases *# IDs removed *Ordinance/SOP review (Jan)	*# IDDE Cases *# IDs removed *Ordinance/SOP review (Jan)	Complete Co IDDE SOP by goal date. Review annual metrics & trends between reporting periods. Level or decreasing IDDE amounts between reporting periods indicates effective program. Annual review of program SOP & ordinance language to improve effectiveness of enforcement .	
MCM3 4.3.C	3B <a href="#">The County uses Chapter 240, Solid Waste Management Code and Environmental Health &amp; Protection SOP (see Appendix C, pg. C-47)</a>	Effectively prohibit, unauthorized non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures	Ryan Tilley, Environmental Health	Environmental change & decreased pollutants	*# Illegal dumping cases (see 4.1.C, #10) *weight of illegally dumped waste removed (see 4.1.C, #1 & 10) *Ordinance/SOP review (Jan)	*# Illegal dumping cases (see 4.1.C, #10) *weight of illegally dumped waste removed (see 4.1.C, #1 & 10) *Ordinance/SOP review (Jan)	*# Illegal dumping cases (see 4.1.C, #10) *weight of illegally dumped waste removed (see 4.1.C, #1 & 10) *Ordinance/SOP review (Jan)	*# Illegal dumping cases (see 4.1.C, #10) *weight of illegally dumped waste removed (see 4.1.C, #1 & 10) *Ordinance/SOP review (Jan)	*# Illegal dumping cases (see 4.1.C, #10) *weight of illegally dumped waste removed (see 4.1.C, #1 & 10) *Ordinance/SOP review (Jan)	Review annual metrics & trends between reporting periods in 4.1.C, #1 & 10. Level or decreasing dumping complaints & illegal waste removed between reporting periods indicates effective program. Annual review of program SOP & ordinance language to determine if ordinance prohibits effective enforcement .	

Permit Section	BMP Description	BMP Purpose	Responsible Person (optional - only if multiple people on MS4 team)	Goal/Expected Result of BMP	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	BMP Evaluation	BMP Success/Modification
					Permit Year 1	Permit Year 2	Permit Year 3	Permit Year 4	Permit Year 5		
MCM3 4.3.D	4 See 4.3.D in SWMP. Specific Education & Outreach Programs are detailed in 4.1.C above. Door-hangers are distributed & "no-dumping" placards are affixed to storm sewer inlets where IDs occur & the source & violator cannot be determined (4.1.C, #9).	See 4.1.C. Notify residents in area of ID about specific pollutant violation & provide reporting SOP & educational resources	Jared Agee, BCE See 4.1.C	See 4.1.C. Behavioral & environmental change & decreased pollutants	See 4.1.C - especially 4.1.C, #9	See 4.1.C - especially 4.1.C, #9	See 4.1.C - especially 4.1.C, #9	See 4.1.C - especially 4.1.C, #9	See 4.1.C - especially 4.1.C, #9	See 4.1.C. Review annual metrics for 4.1.C, #9 & compare to ID complaint metrics. Reduction in IDs in hotspot areas indicates successful outreach.	
MCM3 4.3.E	5A Dry Weather Field Screening of Outfalls in Priority Areas (See SWMP 4.3.E)	Evaluate outfalls to WOTS to identify existing ID/IC issues	Jared Agee, BCE	Environmental change & decreased pollutants	*Completion of Dry Weather Screening SOP, Inspection Forms, & GIS Mapping of Priority Areas # Outfalls inspected (goal-50% in priority areas) # IDs/ICs observed	# Outfalls inspected (goal-50% in priority areas) # IDs/ICs observed	# Outfalls inspected (goal-50% in priority areas) # IDs/ICs observed	# Outfalls inspected (goal-50% in priority areas) # IDs/ICs observed	# Outfalls inspected (goal-50% in priority areas) # IDs/ICs observed	Review annual metrics and locations of IDs/ICs to determine if new hotspots exist & if priority areas need to be adjusted	

Permit Section	BMP Description		BMP Purpose	Responsible Person (optional - only if multiple people on MS4 team)	Goal/Expected Result of BMP	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	BMP Evaluation	BMP Success/Modification
						Permit Year 1	Permit Year 2	Permit Year 3	Permit Year 4	Permit Year 5		
MCM3 4.3.E	5B	Dry Weather Field Screening of Outfalls outside of Priority Areas (See SWMP 4.3.E)	Evaluate outfalls to WOTS to identify existing ID/IC issues	Jared Agee, BCE	Environmental change & decreased pollutants	Completion of Dry Weather Screening SOP, Inspection Forms, & GIS Mapping of Priority Areas	N/A	# Outfalls inspected (goal-33% outside of priority areas) # IDs/ICs observed	# Outfalls inspected (goal-33% outside of priority areas) # IDs/ICs observed	# Outfalls inspected (goal-33% outside of priority areas) # IDs/ICs observed	Review annual metrics and locations of IDs/ICs to determine if new hotspots exist & if priority areas need to be adjusted	
MCM3 4.3.F	6	See 4.3.F in SWMP. Maintain GIS map with mapping layers for zoning, outfalls, properties with individual private sewage disposal and a database with dry-weather screening records of outfalls & ID cases.	Identify priority areas for ID/IC	Jared Agee, BCE	Environmental change & decreased pollutants	Annual review of priority area SOP	Annual review of priority area SOP	Annual review of priority area SOP	Annual review of priority area SOP	Annual review of priority area SOP	Review annual dry-weather screening inspections, locations of IDs/ICs & Illegal Dumping, Highway Street Sweeping & Storm Sewer Cleaning reports (4.6.D, #4B), & Mission Clean Stream reports (4.1.C, #1) to determine if new hotspots exist & if priority areas need to be adjusted	
MCM3 4.3.G	7	See 4.3.G in SWMP	Ensure proper enforcement of IDDE program and to deter future violations	Jared Agee, BCE	Environmental change & decreased pollutants	# IDDE Enforcement actions	# IDDE Enforcement actions	# IDDE Enforcement actions	# IDDE Enforcement actions	# IDDE Enforcement actions	Compare annual metrics with metrics in 4.3.C, #3A (#IDDE Cases). Proportional reduction in ID/IC cases and enforcement indicates successful program. Annual review of enforcement section of ordinance.	
MCM4 4.4.A	1	<a href="#">The County has a completed Land Disturbance &amp; Sediment Control Ordinance in place, Chapter 412 Erosion and Sediment Control Regulations</a>	Reduce or prevent polluted discharges into the storm sewer system from construction sites	Rich Gnecco, Development Review	Behavioral & environmental change & decreased pollutants	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Ordinance review (Jan)	Annual review of program SOP & ordinance language to determine if ordinance prohibits effective enforcement	
MCM4 4.4.B	2	See 4.4.B in SWMP	Educate operators about Co SOP & regulations. Reduce or prevent polluted discharges into the storm sewer system from construction sites	Rich Gnecco, Development Review	Behavioral & environmental change & decreased pollutants	See 4.1.C, # 26	See 4.1.C, # 26	See 4.1.C, # 26	See 4.1.C, # 26	See 4.1.C, # 26	Review annual metrics & trends between reporting periods to measure success of outreach. Level or decreasing violations between reporting periods indicates successful operator SOP.	
MCM4 4.4.C	3	See 4.4.C in SWMP	Educate designers about Co SOP & regulations. Reduce or prevent polluted discharges into the storm sewer system from construction sites	Rich Gnecco, Development Review	Behavioral & environmental change & decreased pollutants	# LD/ESC plan reviews performed # LD permits issued % site plans reviewed for potential WQ impacts (goal 100%)	# LD/ESC plan reviews performed # LD permits issued % site plans reviewed for potential WQ impacts (goal 100%)	# LD/ESC plan reviews performed # LD permits issued % site plans reviewed for potential WQ impacts (goal 100%)	# LD/ESC plan reviews performed # LD permits issued % site plans reviewed for potential WQ impacts (goal 100%)	# LD/ESC plan reviews performed # LD permits issued % site plans reviewed for potential WQ impacts (goal 100%)	Annual review of plan review SOP & checklists	



Permit Section	BMP Description		BMP Purpose	Responsible Person (optional - only if multiple people on MS4 team)	Goal/Expected Result of BMP	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	BMP Evaluation	BMP Success/Modification
						Permit Year 1	Permit Year 2	Permit Year 3	Permit Year 4	Permit Year 5		
MCM4 4.4.D	4	See 4.4.D in SWMP	Create public involvement and provides additional source for reporting & addressing violations	Rich Gnecco, Development Review	Public involvement & decreased pollutants	# LD complaints received	# LD complaints received	# LD complaints received	# LD complaints received	# LD complaints received	Review annual metrics & trends between reporting periods to measure success of reporting mechanisms. A level amount of complaints between reporting periods indicates successful reporting mechanisms.	
MCM4 4.4.E	5	See 4.4.E in SWMP	Ensure adequate protection of construction sites	Rich Gnecco, Development Review	Environmental change & decreased pollutants	See 4.4.F	See 4.4.F	See 4.4.F	See 4.4.F	See 4.4.F	Annual review of inspection SOP & checklists	
MCM4 4.4.F	6	See 4.4.F in SWMP	Ensure adequate protection of construction sites	Rich Gnecco, Development Review	Environmental change & decreased pollutants	# LD inspections performed # NTCs issued	# LD inspections performed # NTCs issued	# LD inspections performed # NTCs issued	# LD inspections performed # NTCs issued	# LD inspections performed # NTCs issued	Review proportion of NTCs issued to # inspections performed. Level trends for NTC issuance indicate a consistent & successful program.	
MCM4 4.4.G	7	See 4.4.G in SWMP	Ensure adequate protection of construction sites	Rich Gnecco, Development Review	Behavioral change & decreased pollutants	# NOVs issued # Citations/Fines/Other Penalties	# NOVs issued # Citations/Fines/Other Penalties	# NOVs issued # Citations/Fines/Other Penalties	# NOVs issued # Citations/Fines/Other Penalties	# NOVs issued # Citations/Fines/Other Penalties	Review metrics, trends between reporting periods, & metrics from 4.4.D & 4.4.F. Level trends in enforcement activities indicate a consistent & successful program.	
MCM5 4.5.A	1	See 4.5.A in SWMP	Ensure permanent & adequate protection of downstream watershed after completion of site development	Rich Gnecco, Development Review	Environmental change, decreased erosion & pollutants, & reduced impact to downstream watershed	# SWMFs installed # Site/Subdivision plans approved	# SWMFs installed # Site/Subdivision plans approved	# SWMFs installed # Site/Subdivision plans approved	# SWMFs installed # Site/Subdivision plans approved	# SWMFs installed # Site/Subdivision plans approved	Review proportion of SWMFs installed to # Site/Subdivision plans approved. Level trends indicate a consistent & successful program. Use information to help evaluate IDDE Priority Areas in 4.3.F	

Permit Section	BMP Description	BMP Purpose	Responsible Person (optional - only if multiple people on MS4 team)	Goal/Expected Result of BMP	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	BMP Evaluation	BMP Success/Modification
					Permit Year 1	Permit Year 2	Permit Year 3	Permit Year 4	Permit Year 5		
MCM5 4.5.B	2 The County has a Post-Construction Stormwater Management Ordinance & Design Criteria for such. Section 405.525.D, #12 regulates commercial sites and Section 410.410 regulates subdivision development. Design Criteria Manual Section 70 contains requirements for post-construction stormwater management	Ensure permanent & adequate protection of downstream watershed after completion of site development	Rich Gnecco, Development Review	Environmental change, decreased erosion & pollutants, & reduced impact to downstream watershed	Ordinance & Design Criteria review (Jan)	Ordinance & Design Criteria review (Jan)	Ordinance & Design Criteria review (Jan)	Ordinance & Design Criteria review (Jan)	Ordinance & Design Criteria review (Jan)	Annual review of program SOP & ordinance language to determine if ordinance prohibits effective enforcement	
MCM5 4.5.C	3 See 4.5.C in SWMP	Ensure permanent & adequate protection of downstream watershed after completion of site development	Rich Gnecco, Development Review	Behavioral & environmental change, decreased erosion & pollutants, & reduced impact to downstream watershed	See 4.5.E	See 4.5.E	See 4.5.E	See 4.5.E	See 4.5.E	Annual review of program SOP & ordinance language	
MCM5 4.5.D	4 See 4.5.D in SWMP	Ensure consistent & adequate maintenance of SWMFs for protection of downstream watershed after completion of site development	Rich Gnecco, Development Review	Behavioral & environmental change, decreased erosion & pollutants, & reduced impact to downstream watershed	See 4.5.E	See 4.5.E	See 4.5.E	See 4.5.E	See 4.5.E	Annual review of program SOP & ordinance language	
MCM5 4.5.E	5 See 4.5.E in SWMP	Ensure consistent & adequate maintenance of SWMFs for protection of downstream watershed after completion of site development	Rich Gnecco, Development Review	Behavioral & environmental change, decreased erosion & pollutants, & reduced impact to downstream watershed	# SWMF maintenance inspections # Failed facilities	# SWMF maintenance inspections # Failed facilities	# SWMF maintenance inspections # Failed facilities	# SWMF maintenance inspections # Failed facilities	# SWMF maintenance inspections # Failed facilities	Review annual metrics & trend between reporting periods for proportion of failed facilities to # SWMF maintenance inspections. Level or decreasing trends indicate a successful program.	
MCM6 4.6.A	1 <a href="#">Annual training conducted for: 1) Co Highway O&amp;M staff (including Airport) per SWPPP/NPDES Industrial Permit Requirements. 2) Parks maintenance staff by Parks Superintendents &amp; Horticulture and Natural Resource Supervisors (see SWMP 4.6.A and specific training documentation in Appendix C, pgs. C-76 &amp; C-132).</a>	Educate Co staff about application, storage & disposal of pollutants & maintenance of BMPs to reduce target pollutants in runoff from Co facilities	John Lyons, Highway Department Dennis Green, Parks	Behavioral change, decreased pollutants	See 4.1.C, #35 for reporting metrics & goals	See 4.1.C, #35 for reporting metrics & goals	See 4.1.C, #35 for reporting metrics & goals	See 4.1.C, #35 for reporting metrics & goals	See 4.1.C, #35 for reporting metrics & goals	Review annual goals of 4.1.C, #35 & annual goals of 4.1.C, #36 to measure success of outreach. Training 100% of O&M staff annually and a level or increase in facilities passing inspection indicates successful outreach.	

Permit Section	BMP Description	BMP Purpose	Responsible Person (optional - only if multiple people on MS4 team)	Goal/Expected Result of BMP	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	Measurable Goals, Milestones, and Dates	BMP Evaluation	BMP Success/Modification
					Permit Year 1	Permit Year 2	Permit Year 3	Permit Year 4	Permit Year 5		
MCM6 4.6.B	2 <a href="#">A list of all County ops/facilities impacted by operation and maintenance program is maintained by the MS4 Director and included in Appendix B, pg. B-2</a>	Organization, coordination & management of MCM 6 program	Rich Gnecco, Development Review	Efficiently organized and coordinated SWMP	Review & update list as necessary - annual review & reconciliation in Jan.	Review & update list as necessary - annual review & reconciliation in Jan.	Review & update list as necessary - annual review & reconciliation in Jan.	Review & update list as necessary - annual review & reconciliation in Jan.	Review & update list as necessary - annual review & reconciliation in Jan.	Annual Review & reconciliation of Appendix B	
MCM6 4.6.C	3 <a href="#">A list of all permittee owned or operated industrial facilities subject to NPDES permits that discharge to the MS4 is maintained by the MS4 Director and included in Appendix B, pg. B-3</a>	Organization, coordination & management of MCM 6 program	Rich Gnecco, Development Review John Lyons, Hwy Dept	Efficiently organized and coordinated SWMP	Annual review & reconciliation in Jan.	Annual review & reconciliation in Jan.	Annual review & reconciliation in Jan.	Annual review & reconciliation in Jan.	Annual review & reconciliation in Jan.	Annual Review & reconciliation of Appendix B	
MCM6 4.6.D	4 See SWMP 4.6.D	Prevention of common and hazardous pollutants from Co facilities entering Co MS4	John Lyons, Highway Department Dennis Green, Parks	Decreased pollutants	*See Measurable Goals for 4.1.C, #36 *Annual review of SOPs/SWPPPs	*See Measurable Goals for 4.1.C, #36 *Annual review of SOPs/SWPPPs	*See Measurable Goals for 4.1.C, #36 *Annual review of SOPs/SWPPPs	*See Measurable Goals for 4.1.C, #36 *Annual review of SOPs/SWPPPs	*See Measurable Goals for 4.1.C, #36 *Annual review of SOPs/SWPPPs	Review annual metrics of 4.1.C, #36 to measure effectiveness of BMPs. Level or decrease in facilities failing inspection indicates effective BMP implementation.	
MCM6 4.6.E	5A Street Sweeping Program - All Co maintained streets with curb & gutter are cleaned with a street sweeping truck semi-annually (typically Spring & Fall)	Removal of petroleum & vehicular based pollutants & leaf litter, floatables & debris	John Lyons, Hwy Dept	Decreased pollutants & less blockage and maintenance to MS4	*Road miles swept # truckloads/weight of debris removed from Co streets	*Road miles swept # truckloads/weight of debris removed from Co streets	*Road miles swept # truckloads/weight of debris removed from Co streets	*Road miles swept # truckloads/weight of debris removed from Co streets	*Road miles swept # truckloads/weight of debris removed from Co streets	Review annual metrics & trends between reporting periods for weight or volume of Debris/Road Mile. Level or increasing amounts of debris removed between reporting periods indicates a successful program. Decreasing amounts of debris removal indicates successful outreach.	
MCM6 4.6.E	5B See SWMP 4.6.E. Facilities under industrial NPDES permits use SWPPP. Inspection records are kept for the Hwy Weldon Spring Storage Facility per SWPPP. All other Co facilities are inspected by Dev Rev division bi-annually.	Ensure periodic & effective maintenance of facility BMPs	John Lyons, Highway Department Dennis Green, Parks Rich Gnecco, Dev Review	Behavioral change & decreased pollutants	Annual review of SWPPPs, Facility Inspection Records, and Co self-inspection per 4.1.C, #36	Annual review of SWPPPs, Facility Inspection Records, and Co self-inspection per 4.1.C, #36	Annual review of SWPPPs, Facility Inspection Records, and Co self-inspection per 4.1.C, #36	Annual review of SWPPPs, Facility Inspection Records, and Co self-inspection per 4.1.C, #36	Annual review of SWPPPs, Facility Inspection Records, and Co self-inspection per 4.1.C, #36	Annual review of SWPPPs, Facility Inspection Records, and metrics of 4.1.C, #36. Level or decrease in facilities failing inspection indicates effective facility controls.	

