Stormwater Management Program
2022 Annual Update

Background

The National Pollutant Discharge Elimination System (NPDES) permit program was created in 1972 by the Clean Water Act (CWA). The CWA is intended to promote and improve water quality by regulating the discharge of pollutants into waters of the United States. Under the CWA, the Environmental Protection Agency (EPA) authorizes state governments to permit, administer, and enforce the NPDES program while the EPA maintains oversight authority.

NPDES Permit

In accordance with the CWA, the Missouri Department of Natural Resources (MDNR) has assigned an NPDES permit to the City of Lee's Summit for the regulation of discharges to the City's Municipal Separate Storm Sewer System (MS4). By virtue of the CWA, the City must comply with the requirements of the NPDES program, which includes development of a Stormwater Management Program and Stormwater Management Plan.

The NPDES permit is renewed on a 5-year cycle. The most recent permit was renewed on December 1, 2021. The Stormwater Management Plan is required to be reviewed annually by staff and an update of the Stormwater Management Program is required to be provided annually to the City Council.

Stormwater Management Plan

The Public Works Department is responsible for maintaining the City's NPDES permit and associated Stormwater Management Program.   The requirements for the Stormwater Management Plan are outlined in the City's NPDES permit and include the following six Minimum Control Measures (MCMs):

1. Public Education and Outreach
2. Public Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention and Good Housekeeping

The Public Works Department is primarily responsible for the requirements of MCMs 1, 2, 3, and 6 of the Stormwater Management Plan. The Public Works Department shares responsibility for the requirements of MCM 4 with the Development Services Department and the Development Services Department is primarily responsible for the requirements of MCM 5.

These MCMs involve preparing and sharing educational materials for target audiences, which include residents, businesses, and developers; public participation events such as Stream Team and Storm Drain Stenciling; identifying improper disposal or management of wastes, on-site inspections and enforcement of erosion control and construction wastes, inspections of long-term water quality management, and staff training. Each of these MCMs have an iterative process that requires the City to evaluate how well the City is achieving the desired outcome and to adjust the program accordingly to enhance the results.

To date during the 2022 calendar year, City staff has completed the following permit-required activities:

- engaged several Scouting groups, volunteers, and a large business to clean two creeks and complete approved stenciling on more than 500 hundred storm drains
- updated our watershed and outfall map
- posted information and videos to social media outlets regarding stormwater quality for residents and businesses
- sent nearly 100 educational letters to developers and concrete companies regarding proper concrete washout techniques
- inspected about 10% of all of the outfalls in the City
- reviewed and revised Stormwater Pollution Prevention Plans (SWPPPs) for City-owned facilities
- implemented dry weather field screening for priority areas and projects, including flood projects, that have the potential for impacts to nearby bodies of water
- provided internal stormwater quality training to field staff
- finished review of MCM 5 requirements
- worked on drafting the required private stormwater Best Management Practices (BMP) inspection and maintenance program, and
- worked on drafting required ordinance changes and enforcement strategies related to the BMP inspection and maintenance program to ensure they function with existing methods and software.