



LEE'S SUMMIT

M I S S O U R I

Requirements of NPDES Permit

The City's NPDES permit has six Minimum Control Measures (MCMs) that the City is required to comply with. The draft renewal permit has been issued by the Missouri Department of Natural Resources (MDNR) with the final permit expected to be issued in the coming weeks. The following is a breakdown of what has been completed to date, what is in progress, and what still needs to be completed. Unless otherwise noted, the items listed below need to be completed.

In progress: means City staff is currently working on developing plans, procedures, or programs to comply with stated permit requirement.

Active/developed: means City staff has already prepared, developed, or implemented stated permit requirement(s).

Public Outreach and Education MCM

- **In progress:** Develop a plan to identify target audiences for a public education program who are likely to have significant stormwater impacts (i.e., gas stations, restaurants, etc.).
- **In progress:** Determine the pollutants the education program is designed to address (cigarette butts, grease, gasoline, etc.).
- **Active/developed:** implementation of a public education program to distribute educational material to the community or conduct equivalent outreach activities about the impact of stormwater discharges on waterbodies and steps the public can take to reduce pollutants in stormwater runoff; development of a plan to inform individuals and groups how they can get involved in stormwater activities; and development of an outreach strategy.

Public Involvement and Participation MCM

- Implement a public involvement/participation program that provides opportunities for public involvement in the development and oversight of the City's Stormwater Management Plan (SWMP) and provides opportunities for public involvement of the permit renewal application, which needs to include:
 - A public notice period (recommended at least 10 advanced days) to allow the public to review the City's SWMP and permit renewal application prior to submission to the Missouri Department of Natural Resources (MDNR).
 - A notice of public meeting (recommended at least 72 prior hours), if needed, regarding the SWMP and permit renewal application.
 - A plan to target all potentially affected stakeholder groups (commercial and



industrial businesses, trade associations, environmental groups, homeowners associations (HOAs), and educational organizations).

- If a stormwater management panel/committee is developed, the City will provide opportunities for citizen representatives on the panel/committee.
- Provide opportunities and work with citizen volunteers willing to educate others about the City's SWMP.
- **Active/developed:** develop volunteer stream/lake cleanup activities.

Illicit Discharge Detection and Elimination MCM

- Update the City's storm drainage map showing the location of all constructed outfalls and the names/locations of all receiving waters of the state that receive discharges from those outfalls.
- Increase enforcement procedures and actions for prohibition of non-stormwater discharges into the City's storm system.
- Develop a plan and implementation schedule to detect and address non-stormwater discharges.
- Develop a dry weather field screening plan for non-stormwater flows and field tests of selected chemical parameters as indicators of discharge sources.
- Develop procedures for locating priority areas with higher likelihood of illicit connections to the storm system or perform ambient sampling to locate impacted reaches.
- Develop a procedure to tracing the source of an illicit discharge, including specific techniques.
- Develop procedures for eliminating illicit discharges.
- Develop a plan to address non-stormwater discharges the City identifies as significant contributors of pollutants to the City's regulated Municipal Separate Storm Sewer System (MS4), even if they are permitted.
- **Active/developed:** Development and implementation of an ordinance that prohibits non-stormwater discharges into the City's MS4; a plan to inform public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste.

Construction Site Stormwater Runoff Control MCM

The City satisfies all requirements outlined in this MCM.

- **Active/developed:** Development, implementation, and enforcement of an ordinance to require operators to implement erosion and sediment control Best Management Practices (BMPs) at construction sites; develop requirements for construction site operators to control construction-site waste that may cause adverse impacts to water quality; develop procedures for the City to consider and review all pre-construction site plans for potential water quality impacts; develop procedures for the City to receive and consider information submitted from the public; develop procedures for the City to inspect



sites and enforce control measures; active inspection of any structure that functions to prevent pollution of stormwater to ensure that all BMPs are effective; and develop a plan to ensure compliance with the City's erosion and sediment control ordinance.

Post-Construction Stormwater Management in New Development and Redevelopment MCM

- Develop a plan to ensure adequate long-term operation and maintenance (O&M) of selected BMPs including types of agreements between the City and other parties such as post-development landowners or regional authorities.
- Develop strategies to minimize water quality impacts, including structural and non-structural BMPs including the assessment of site characteristics at the beginning of construction site design phase to ensure adequate planning for stormwater program compliance. The goal is to arrive at designs that protect sensitive areas, minimize the creation of stormwater pollution, and utilize BMPs that effectively remove stormwater pollution.
- An inspection plan with implementation schedules for post construction stormwater BMPs to ensure that all BMPs are implemented and effective.
- **Active/developed:** Development, implementation, and enforcement of an ordinance to address the post-construction runoff from new development and redevelopment projects.

Pollution Prevention/Good Housekeeping for Municipal Operations MCM

- Develop and implement an O&M program that includes a training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.
 - **In progress:** Create a government employee training program to prevent and reduce stormwater pollution from activities such as parks and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.
 - **In progress:** Develop a list of all municipal operations that are impacted by this program. Include any industrial facilities that the City owns or operates (landfill, airport).
 - **In progress:** Maintenance BMPs, maintenance schedules, and long-term inspection procedures for controls to reduce floatable and other pollutants to the City's MS4.
 - **In progress:** Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer station, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas the City operates.
 - Develop procedures to assess impacts of water quality for new flood management projects (those developed or designed to reduce flooding), if applicable.
 - **In progress:** Store all paints, solvents, petroleum waste products (except fuels) under the control of the City shall be stored so that these materials are not



exposed to stormwater. Sufficient practices of spill prevention, control, and/or management will be provided to prevent spills from entering the City's MS4.

- **Active/developed:** Development, implementation, and enforcement of an ordinance to address the post-construction runoff from new development and redevelopment projects; and develop procedures for the disposal of waste removed from the City's MS4.

Measurable goals

Required for each BMP in conjunction with each MCM.

Review and Update the SWMP

In addition to the MCMs, an annual review of the SWMP is required in conjunction with the preparation of the MS4 SWMP report (see requirements in Public Involvement MCM).

Review SWPPPs

On an annual basis, review the City's Stormwater Pollution Prevention Plans (SWPPPs) for each City-owned facility.

ADDITIONAL ITEMS NOT RELATED TO THE NPDES PERMIT

Revise Chapter 34 of the Code of Ordinances

Update the chlorine concentration allowed in private swimming pool discharges and the range of pH discharges that are allowed.

Revise Article 6 of the UDO

Include language from the Federal Emergency Management Agency (FEMA) in the Unified Development Ordinance (UDO) for the updated FEMA Floodplain Maps that will become effective in January 2017.