

2021 MS4 New Permit Requirements

Question	Permit Item	MCM	Compliance Required in One Year from Permit Issuance?	Permit Requirement	Category	Corrective Action
13	16.5	1	Yes	At least once each calendar year, do you distribute educational materials or equivalent outreach to residents, businesses, commercial facilities, and institutions, focused on deicing salt use? Materials need to focus on: 1) impacts of deicing salt use on receiving water 2) methods to reduce deicing salt use 3) proper storage of salt or other deicing materials	Public Education	MSA recommends the city provide educational materials to residents that inform them of smart salting practices. The MPCA has a smart salting pamphlet that can be used as a reference for the educational materials the City distributes. MSA can assist in creating/implementing the smart salting educational materials if needed.
18.D	16.7	1	No	The city must develop and implement an education and outreach plan that consists of: a description of any coordination with and/or use of stormwater education and outreach programs implemented by other entities, if applicable	Public Education	MSA recommends the city implement a public outreach plan for stormwater education
20.C	16.8	1	No	Does the city document activities held, including dates, to reach each target audience	Documentation	MSA recommends the city establish a method to document activities to reach target audience
20.D	16.8	1	No	Does the city document quantities and descriptions of educational materials distributed, including dates distributed	Documentation	MSA recommends the city establish a method to document the amount of education materials distributed
20.E	16.8	1	Yes	Estimated audience (e.g. number of participants, viewers, readers, listeners, etc.) for each completed education and outreach activity	Documentation	MSA recommends the city establish a method. This could be based off the method to document the amount of materials distributed
31.A	17.7	2	No	Does the city document all relevant written input submitted by persons regarding the SWPPP? <i>Does the city also document</i>	Documentation	MSA recommends the city establish a method for documenting input/correspondence related to the SWPPP.

31.C	17.7	2	No	Does the city document the date(s), location(s) and estimated number of participants at events held for purposes of compliance with permit item 17.3	Documentation	See response to question 31.A
31.E	17.7	2	Yes	Does the city document the date(s), location(s), description of activities, and estimated number of participants at events held for the purpose of compliance with permit item 17.6	Documentation	See response to question 31.A
39	18.5	3	Yes	Regulatory mechanism that requires owners or custodians to remove and properly dispose of feces from permittee owned land areas?	Regulatory Mechanism	MSA recommends the city adopt the animal waste ordinance using the draft language provided by the MPCA.
41.A	18.6	3	Yes	Does the city's regulatory mechanism for salt storage require the designated salt storage areas be covered or indoors	Regulatory Mechanism	MSA recommends the city adopt the salt storage ordinance using the draft language provided by the MPCA.
41.B	18.6	3	Yes	Does the city's regulatory mechanism for salt storage require that designated salt storage areas be located on an impervious surface	Regulatory Mechanism	Ordinance for salt storage would satisfy this permit requirement
41.C	18.6	3	Yes	Does the city's regulatory mechanism for salt storage require the implementation of practices to reduce exposure when transferring material in designated salt storage areas (e.g., sweeping, diversions, and/or containment)	Regulatory Mechanism	Ordinance for salt storage would satisfy this permit requirement
54.A	18.12	3	Yes	Does the city have written procedures for investigating, locating, and eliminating the source of illicit discharges that include a timeframe in which the city will investigate a reported illicit discharge?	Procedures	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota

54.B	18.12	3	No	Does the city have written procedures for investigating, locating, and eliminating the source of illicit discharges that include use of visual inspections to detect and track the source of an illicit discharge?	Procedures	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
54.C	18.12	3	Yes	Does the city have written procedures for investigating, locating, and eliminating the source of illicit discharges that include tools available to the city to investigate and locate and illicit discharge (e.g., mobile cameras, collecting and analyzing water samples, smoke testing, dye testing, etc.)	Procedures	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
54.D	18.12	3	Yes	Does the city have written procedures for investigating, locating, and eliminating the source of illicit discharges that include cleanup methods available to the city to remove an illicit discharge or spill	Procedures	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
54.E	18.12	3	Yes	Does the city have written procedures for investigating, locating, and eliminating the source of illicit discharges that includes the name or position title of responsible person(s) for investigating, locating, and eliminating an illicit discharge.	Procedures	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
56	18.13	3	No	Does the city's written procedures for responding to spills include the immediate notificaiotn of the Minnesota Department of Public Safety Duty Officer at 1-800-422-0798 or 651-649-5451, if the source of the illicit discharge is a spill or leak as defined in Minn. State 115.061	Procedures	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
61.A	18.15	3	No	Does the city document the date(s) and location(s) of IDDE inspections conducted in accordance with items 18.7 and 18.11	Inspections	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
61.C	18.15	3	No	Does the city document the date(s) of discovery of all illicit discharges	Documentation	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota

61.D	18.15	3	No	Does the city document the identification of outfalls, or other areas, where illicit discharges have been discovered	Documentation	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
61.E	18.15	3	No	Does the city document sources (including a description and the responsible party) of illicit discharges (if known)	Documentation	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
61.F	18.15	3	No	Does the city document action(s) taken by the city, including date(s), to address discovered illicit discharges	Documentation	MSA recommends that city implement the draft IDDE policy that has been prepared for the City of Mendota
65.A	18.17	3	No	The city must document any enforcement pursuant to the ERPs in item 18.14, including the name of the person responsible for violating the terms and conditions of the city's regulatory mechanism(s)	Documentation	MSA recommends that city implement the draft ERP policy that has been prepared for the City of Mendota
65.B	18.17	3	No	The city must document any enforcement pursuant to the ERPs in item 18.14, including the date(s) and location(s) of the observed violation(s)	Documentation	MSA recommends that city implement the draft ERP policy that has been prepared for the City of Mendota
65.D	18.17	3	No	The city must document any enforcement pursuant to the ERPs in item 18.14, including the correcting action (including completion schedule) issued by the city	Documentation	MSA recommends that city implement the draft ERP policy that has been prepared for the City of Mendota
65.E	18.17	3	No	The city must document any enforcement pursuant to the ERPs in item 18.14, including referrals to other regulatory organizations	Documentation	MSA recommends that city implement the draft ERP policy that has been prepared for the City of Mendota

65.F	18.17	3	No	The city must document any enforcement pursuant to the ERPs in item 18.14, including the date the violation was resolved	Documentation	MSA recommends that city implement the draft ERP policy that has been prepared for the City of Mendota
75.B	19.6	4	Yes	Does the permittee have written procedures that require the use of a written checklist, consistent with the requirements of the regulatory mechanism(s), to document the adequacy of each site plan required	Procedures	MSA recommends the City adopt the draft site plan review checklist that has been prepared for the City of Mendota
77	19.8	4	Yes	Does the city maintain written procedures for identifying high-priority and low-priority sites for inspection?	Procedures	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
79	19.9	4	Yes	Does the city use a written checklist to document each site inspection when determining compliance with your regulatory mechanism(s)?	Documentation	MSA recommends the City adopt the draft construction site inspection checklist that has been prepared by the MPCA
87	19.12	4	Yes	Does the city maintain ERPs to compel compliance with your regulatory mechanism(s) in Section 19? At a minimum, ERPs must include a description of enforcement tools available and the name/position of responsible person for conducting enforcement.	Procedures	MSA recommends that city implement the draft ERP policy that has been prepared for the City of Mendota
91	19.13	4	Yes	Does the City document each site plan review conducted?	Documentation	MSA recommends the City adopt the draft site plan review checklist that has been prepared for the City of Mendota
94	19.15	4	No	Does the City document enforcement conducted pursuant to the ERPs in item 19.12? Documentation must include: a. name of person responsible for violating the terms and conditions of the permittees regulatory mechanism b. date/location of violation c. description of violation d. corrective action issued by city e. referrals to other regulatory organizations f. date violations resolved	Documentation	MSA recommends that city implement the draft ERP policy that has been prepared for the City of Mendota

101.B	20.5	5	Yes	You must require owners of construction activity to treat the water quality volume on any project where the sum of the new impervious surface and the fully reconstructed impervious surface equals one or more acres.	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.C	20.6	5	Yes	For construction activity (excluding linear projects), the water quality volume must be calculated as one (1) inch times the sum of the new and fully reconstructed impervious surface.	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.D	20.7	5	Yes	For linear projects, the water quality volume must be calculated as the larger of one (1) inch times the new impervious surface or one-half (0.5) inch times the sum of the new and the fully reconstructed impervious surface. Where the entire water quality volume cannot be treated within the existing right-of-way, a reasonable attempt to obtain additional right-of-way, easement, or other permission to treat the stormwater during the project planning process must be made. Volume reduction practices must be considered first, as described in item 20.8. Volume reduction practices are not required if the practices cannot be provided cost effectively. If additional right-of-way, easements, or other permission cannot be obtained, owners of construction activity must maximize the treatment of the water quality volume prior to discharge from the MS4.	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.E	20.8	5	No	Volume reduction practices (infiltration) to retain the water quality volume on-site must be considered first when designing the permanent stormwater treatment system. This permit does not consider wet sedimentation basins and filtration systems to be volume reduction practices. If permit prohibits infiltration, wet sedimentation, or filtration basin may be considered.	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.F	20.9	5	Yes	Infiltration systems must be prohibited when the system would be constructed in areas: (see application for specific areas)	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.G	20.10	5	No	For non-linear projects, where the water quality volume cannot cost effectively be treated on the site for the original construction activity, the city must identify, or may require owners of the construction activity to identify, locations where off-site treatment projects can be completed. If the entire water quality volume is not addressed on the site of the original construction activity, the remaining water quality volume must be addressed through off-site treatment and, at a minimum, ensure the requirements of permit items 20.11 through 20.14 are met.	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.

101.H	20.11	5	No	<p>City must ensure off-site treatment project areas are selected in the following order of preference:</p> <ul style="list-style-type: none"> a. location that yield benefits to the same receiving water that receives runoff from the original construction activity b. locations within the same DNR catchment area as the original construction activity c. locations in the next DNR catchment area up-stream d. locations anywhere in your jurisdiction 	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.I	20.12	5	No	Off-site treatment projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. Routine maintenance already required cannot be used to meet this requirement.	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.J	20.13	5	No	Off-site treatment projects must be completed no later than 24 months after the start of the original construction activity. If you determine that more time is needed to complete the treatment project, you must provide the reason / schedule for completing the project in the annual report.	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
101.K	20.14	5	No	If you receive payment from the owner of a construction activity for off-site treatment, you must apply any such payment received to a public stormwater project, and all projects must comply with permit items 20.11 through 20.13	Regulatory Mechanism	MSA recommends the City adopt the public works design manual that has been prepared to address the MS4 stormwater requirements.
110.B	20.20	5	Yes	Additional documentatino - the water quality volume that will be treated through volume reduction practices compared to the total water quality volume required to be treated.	Regulatory Mechanism	MSA recommends the City implement the site plan review checklist that has been prepared.
110.C	20.20	5	Yes	Documentation associated with off-site treatment projects the city authorizes, including rationale to support the location of permanent stormwater treatment projects in accordance with items 20.10 and 20.11	Documentation	MSA recommends the City implement the site plan review checklist that has been prepared.
110.D	20.20	5	No	Does the city document payments received and used in accordance with item 20.14 as part of the site plan review?	Documentation	MSA recommends the City implement the site plan review checklist that has been prepared.

101.E	20.20	5	No	Does the city document all legal mechanisms drafted in accordance with permit item 20.15, including dates of agreements and names of all responsible parties involved as part of the site plan review?	Documentation	MSA recommends the City implement the site plan review checklist that has been prepared.
111	20.21	5	Yes	Does the city document training related to the post-construction stormwater management program? Documentation must include: a. general subject matter covered b. names & departments of individuals in attendance c. date of each event	Documentation	MSA recommends the City adopt the training documentation form for all stormwater management training
127	21.8	6	No	The permittee must maintain written procedures for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater.	Procedures	MSA recommends the city adopt the draft procedures to evaluate the performance of existing stormwater ponds.
128	21.9	6	No	Does the city inspect structural stormwater BMPs each calendar year to determine structural integrity, proper function, and maintenance needs?	Inspections	MSA recommends the city increase the inspection frequency for stormwater BMPs to once a calendar year.
136	21.13	6	Yes	Does the city document information associated with the operations and maintenance program? Documentation must include: a. date / description of findings, including whether or not an illicit discharge is detected, for all inspections conducted in accordance with items 21.9 and 21.10 b. any adjustments to inspection frequency as authorized in item 21.9 c. date and description of maintenance conducted as a result of inspection findings, including whether an illicit discharge is detected d. schedule for maintenance of structural stormwater BMPs and outfalls when necessary maintenance cannot be completed within one year of discovery e. stormwater management training events including subject matter covered, individuals in attendance, and date of event	Documentation	MSA recommends the city adopt the IDDE policy, which would satisfy this permit requirement.