Updates

February 7, 2012

Revisions to Appendix A:

- Revised Table of Contents
- Replaced Design Methods and Considerations with Storm Water Performance Criteria and Design Guidelines
- Added Storm Water Pollution Prevention Plan (SWPPP) Requirements
- Replaced Procedures for Considering LID Practices with Low Impact Development Techniques
- Replaced Threatened/Endangered Species and Historic Properties Compliance Efforts with Special Environmental Considerations
- Added Long Term Storm Water Pollution Prevention and Maintenance Plan Requirements
- Replaced SWPPP Review Criteria/Checklists with SWPPP Preconstruction Submittal and Review Checklist
- Added Inspection Authority containing excerpts from the Lindon City Code
- Updated Enforcement Procedures to contain excerpts from the Lindon City Code
- Removed Process for including water quality in city projects (it is in Appendix B)
- Added Maintenance Agreement
- Replaced Construction and Post Construction Best Management Practices (BMP) Fact Sheets with those from the Lindon SWMP adopted in 2003, after the modification of the PT and SCSCS BMP Fact Sheets and the addition of the CC BMP Fact Sheet
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Introduction

City of Lindon

The Lindon area was first established in 1850 as an outgrowth of settlement in the Pleasant Grove area. Lindon was incorporated in April 1924, at which time it had a population of 458 people. The 2000 census listed the population at 8,360. The current population is approximately 10,000.

Lindon stretches from the Wasatch mountains on the east to Utah Lake on the West, and is bordered on the north by Pleasant Grove and on the south by Orem. It is approximately 8.5 square miles in size, with about 6.5 square miles between the foot of the Wasatch Mountains and Utah Lake. Three significant transportation corridors pass through Lindon: Interstate 15, State Street and Geneva Road. Two irrigation canals traverse the City: the Murdock Canal and the North Union Canal. Three aqueducts also traverse the City: the Salt Lake Aqueduct, the Jordan Aqueduct, and the Alpine Aqueduct.

Land along State Street is partially developed commercially; Land along Geneva Road is partially developed industrially. Land east of Geneva Road is mostly developed residentially, with few large tracts of developable land remaining. There is considerable industrial and manufacturing development west of Geneva Road. Most of the remaining undeveloped land in Lindon is in agricultural use. Residential lot sizes in Lindon are fairly large, with minimum lot sizes in the two residential zones being 20,000 square feet and 12,000 square feet.

Lindon City operates a culinary water system throughout the City, and a secondary water system east of Geneva Road. Nearly all development in Lindon is connected to the sanitary sewer system, which discharges to the Orem Wastewater Treatment Plant.
Lindon’s storm drainage conveyance system consists of curbed streets, piped storm drains and open drainages. On the westerly part of the City there are fewer pipes and more open drainages. Storm water from Pleasant Grove and Cedar Hills (on the north) runs through the Lindon drainages on its way to Utah Lake, as does some from Orem (on the south).

**General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)**

The Environmental Protection Agency (EPA) published the Storm Water Phase II Rule on December 8, 1999. The Utah Department of Environmental Quality acts as the administrator of the program for the EPA in the State of Utah. To comply with the requirements of the Phase II Rule, municipalities must obtain an “Authorization to Discharge Municipal Storm Water under the Utah Pollutant Discharge Elimination System (UPDES)” from the State of Utah. The Storm Water Phase II Rule requires municipalities in urbanized areas to develop and implement a Storm Water Management Program (SWMP). The SWMP is the most substantial part of the UPDES Permit.

The SWMP must address six minimum control measures:

1. Public education and outreach on storm water impacts
2. Public involvement/participation
3. Illicit discharge detection and elimination
4. Construction site storm water runoff control
5. Post-construction storm water management in new development and redevelopment
6. Pollution prevention/good housekeeping for municipal operations

Municipalities must develop best management practices (BMPs) to address the requirements of each of these six minimum control measures. They must also establish measurable goals for the BMPs. Municipalities must conduct a review of the effectiveness of the SWMP, and submit a corresponding report to the State annually. The SWMP must be updated every 5 years.

The Lindon Storm Water Management Program was first developed in April 2003 in response to the EPA Storm Water Phase II Rule. It consists of practices intended to reduce storm water runoff quantity and to improve storm water runoff quality in Lindon.

**Lindon City Storm Water Management Program Update**

This Lindon City Storm Water Management Program Update was prepared to renew the previously 2003 Permit and continue Lindon City’s coverage under Small MS4 General UPDES Permit No. UTR090000 issued on August 1, 2010. The Permit Update is intended to reduce the discharge of pollutants from Lindon City, protect water quality, and satisfy the appropriate water quality requirements of the Utah Water Quality Act. The Storm Water Management Program (SWMP) is the majority of the update. The SWMP has addressed the six minimum control measures described in Part 4.2 of the Permit.

The SWMP has implemented a documentation process for gathering, maintaining, and using information to conduct planning, set priorities, track the development and implementation of the SWMP, evaluate Permit compliance/non-compliance, and evaluate the effectiveness of the SWMP implementation. On November 1, 2010 the Minimum Control Measures (MCM) List was created to specify the planning and priorities of the program and the documentation, tracking and maintenance of records were organized in the Appendix. The SWMP has included a schedule in the MCM list that implements the six minimum control measures as described in the Permit.
The SWMP document utilizes the MCM List and Appendix to organize the BMPs and measurable goals that will be implemented in each of the storm water minimum control measures. The MCM List identifies target pollutants and audiences, MS4 Best Management Practices, measurable goals with milestones, associated rationale and measure of success.

The SWMP Appendices contain the documents to track the number of inspections performed, official enforcement actions taken, and types of public education activities implemented as required for each SWMP component. Some of the items listed below will be developed during the 5 year term of the permit. The Appendices are organized as follows:

APPENDIX A - Supplemental Guide to Storm Water Management for Contractors
This Appendix A is intended to be part of the SWMP, yet removable for Contractors, Developers and Engineers.

APPENDIX B - Supplemental Guide to Storm Water Management for Public Works
This Appendix B is intended to be part of the SWMP, yet removable for Public Works Personnel

APPENDIX C - IDDE Program
This Appendix C includes IDDE Procedures/SOP's, Flow charts for Spill Response Procedure and Telephone call-in Response Procedure, IDDE BMP Fact Sheets and the Inspection Report Inventory

APPENDIX D - Documentation
This Appendix D includes Inspection Forms (Construction and Public Facilities), Enforcement Actions, Training Schedule, Training Log, Visual Monitoring Forms, Maintenance Records, Annual Reports, Budget, Public Education Activities and Justification for changes.

APPENDIX E - City Ordinances
This Appendix E includes the city ordinances that will be reviewed and modified if necessary to implement the Permit provisions for General Stormwater, Construction and Post Construction.

APPENDIX F - State/City Permits

APPENDIX G- Maps/Map Book
This Appendix D includes Collection System, Floor Drains, Facility Storm Drain Maps, City Owned Facilities Inventory, Post Construction BMPs, Outfalls Inventory, Active Construction Sites Inventory, Spills, Enforcement Action Log and Monitoring Locations Inventory. The following organization chart was established to identify the persons responsible for implementing or coordinating the BMPs contained within the SWMP document. The Organization Chart Department Responsibilities explain the duties each member of the organization has been assign to accomplish the goals of the SWMP.
Lindon City SWMP Organization

Organization Chart Department Responsibilities

City Administrator
- Liaison with CIM administration and City Council
- General coordination of the Storm Water Pollution Prevention (SWPP) program

Storm Water Division Supervisor
- Oversee SWPP program specifics and work with department heads
- Responsible for shared facilities and general work areas including:
  - Large equipment wash area
  - Fueling station
  - Salt and materials storage stockpile areas
  - Storm drain system maintenance
  - General BMP maintenance
  - Small vehicle wash area
- Annual report
- Updating SWPPP
- Coordination with J-U-B Engineers, Inc
- Tracking and documentation of activities and actions
- Database updates

Public Works Director
- Liaison with administration and City Council
- General coordination of the Storm Water Pollution Prevention (SWPP) program
- Storm drain mapping
- Street sweeping program
- Fleet dept. maintenance work area
- Chemicals, fluids, and oils in work area, waste oils/fluids
- Metal fabrication Area
- New/post Construction Inspections

J-U-B Engineers, Inc
- Tracking and documentation of activities and actions
- Database updates
- Engineering support
- Help with all reporting
- Storm drain mapping
- Review plans for stormwater compliance {NOI Requirements}
Parks Department Head

- Parks dept. maintenance work area
- Pesticide, herbicide, and fertilizer (PHF) program
- Training parks personnel
- Chemical and fertilizer storage in work area
- Parks department equipment operation
- Equipment maintenance for parks dept.
- Equipment maintenance for water dept.
- Mowing program

Water Division Supervisor

- Water dept. maintenance work area
- Training water dept. personnel
- Chemical storage in work area
- Water dept. equipment operation
- Equipment maintenance for water dept.
- Equipment

Streets Division Supervisor

- Streets dept. maintenance work area
- Streets dept. equipment operation
- Equipment maintenance for streets dept.
- Training streets dept. personnel
- Chemicals storage in work area
- Snow plowing program
- Salt and materials storage stockpile areas
- Metal fabrication area

Sewer Division Supervisor

- Sewer dept. maintenance work area
- Training sewer dept. personnel
- Chemical storage work area, lift stations
- Sewer dept. equipment operations
- Equipment for sewer dept.
- Sanitary Sewer Overflow Program (SSO)
Statement of Basis

Permittee: City of Lindon
Permit Number: UTR090018
Location of MS4: 946 WEST CENTER STREET, LINDON, UTAH 84042
Longitude: 111°46'39.80"W / Latitude: 40°20'18.04"N

Submitted with this permit is the following:

☒ A map of the MS4 location
☒ Information Regarding the overall quality concerns, priorities, and measureable goals specific to the Permittee that were considered in the development and/or revisions to the SWMP document.
☒ A description of the program elements that will be implemented in each of the six minimum control measures.
☒ A description of any modifications to ordinances or long-term/ongoing processes implemented in accordance with the previous MS4 general permit for each of the six minimum control measures.
☒ A description of how the Permittee intends to meet the Permit requirements as described in Part 4.0 by either referencing existing program areas that already meet the Permit requirements or a description and relevant measurable goals that include, as appropriate, the year by which the Permittee will achieve required actions, including interim milestones.
☒ If applicable indication of joint submittal of Co-Permittees and the associated responsibility in meeting requirements of the SWMP.

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations"
Impaired Waters / Controlling Regulated Pollutants (TMDLS)

Part 3.1 of the Permit requires the Permittee to determine whether storm water discharge from any part of the MS4 contributes to a 303(d) listed (i.e., impaired) water-body. If the Permittee has “303(d)” discharges described above, the Permittee must also determine whether a Total Maximum Daily Load (TMDL) has been developed by the Division and approved by EPA for the listed water-body. If there is an approved TMDL, the Permittee must comply with all requirements associated with the TMDL as well as the requirements of Part 3.1.2. If no TMDL has been approved, the Permittee must comply with Part 3.1.2 and any TMDL requirements once it has been approved.

Part 3.1.2 of the Permit states that if the Permittee discharges to an impaired water-body, the Permittee must include in its SWMP document a description of how the Permittee will control the discharge of the pollutants of concern. This description must identify the measures and BMPs that will collectively control the discharge of the pollutants of concern. The measures should be presented in the order of priority with respect to controlling the pollutants of concern.

Primary inflows to Utah Lake are the American Fork River, the Provo River, Mill Race Creek, Hobble Creek, the Spanish Fork River, and Currant Creek. These flows are joined by many minor inflows, both perennial and intermittent. Lindon City does not contribute to any of the primary inflows to Utah Lake but constitutes one of the minor inflows that discharge to Utah Lake just north of the Lindon Boat Harbor (See map below). The storm drain collection system utilizes four drainage ditches, 2000 West, Proctor, Lower and Main. The four ditches combine at 2000 West and 200 South and continue directly into Utah Lake.
Utah Lake is listed on Utah's 2004 §303(d) list for exceedances of state criteria for total phosphorus (TP) and total dissolved solids (TDS) concentrations. A Total Maximum Daily Load (TMDL) has not been developed by the Division and approved by EPA for Utah Lake. Primary sources for TDS in receiving waters are agricultural and residential runoff, leaching of soil contamination and point source water pollution discharge from industrial or sewage treatment plants. The most common chemical constituents are calcium, phosphates, nitrates, sodium, potassium and chloride, which are found in nutrient runoff, general stormwater runoff and runoff from snowy climates where road de-icing salts are applied. The Lindon City Storm Water Management Program will address the total phosphorus (TP) and total dissolved solids (TDS) concentrations through the measurable goals listed in the MCM List. The Program will reduce total phosphorus (TP) and total dissolved solids (TDS) concentrations by:

- Implementing and enforcing the IDDE program to systematically find and eliminate sources of non-storm water discharges from the City and to implement defined procedures to prevent illicit connections.
- Developing, implementing and enforcing a program to reduce pollutants in any storm water runoff to the City storm drain system from construction.
- Developing, implementing and enforcing a program to address post-construction storm water runoff to the City storm drain system from new development and redevelopment construction sites.
- Developing and implementing an operations and maintenance (O & M) program for City-owned or operated facilities.

Concerns and Priorities

Concerns

The water quality within Lindon is relatively good. As mentioned above, the drainage system discharges to Utah Lake which is on the Section 303(d) list of the Clean Water Act. The intent of this Storm Water Management Program (SWMP) is to improve the water quality and possibly decrease the quantity of water discharged to Utah Lake. Like most communities along the Wasatch Front, some of the biggest concerns involve sediment loads (coming primarily from disturbed sites), fertilizers and pesticides coming from lawns and farmlands, and oils and grease coming from the roadways, salts and deicing materials coming from the roadways, improper disposal of household chemicals and waste materials and illicit discharge from industrial sites. Lindon’s SWMP has been geared toward small city applications, targeting the pollutants mentioned.

Priorities

As discussion was held trying to understand the nature of the problems and how to accomplish the goals of the SWMP, it was determined the following areas shall be emphasized.

- This program has been developed with an increased emphasis on education and public involvement with all four groups as listed in the permit.
- The training schedule will be emphasized in the first year of the permit so all key personnel will understand their storm water responsibilities.
- The outfall locations will be prioritized so that the most likely areas of illicit discharge will be inspected first.
- The industrial areas are located on the west side of the city and some are located adjacent to the drainage ditches. These areas will be identified and increased oversight will be initiated.
- The build out in several subdivisions has slowed due to the economy. These subdivisions will be identified and given particular attention to stabilize the sites to prevent erosion.
- Good Housekeeping will be stressed through training and the inspection of priority inspections.
Threatened or Endangered Species and Historic Properties

Part 3.2 states that the Permit does not relieve the Permittee from compliance with Federal or State laws pertaining to threatened or endangered species or historic properties. Where applicable, compliance efforts to these laws shall be reflected in the SWMP document.

The SWMP requires each new project be informed of all Federal or State laws pertaining to threatened or endangered species or historic properties. A form found in Appendix A which will be given to all developers, contractors and design engineers requires the applicant investigate and document Impaired Waters, Threatened or Endangered Species and Historic Properties.

Minimum control measures 1-6

Part 4.2 states that a Renewal Permittee must continue to implement its Storm Water Management Program (SWMP) as described in the application and submittals provided in accordance with the previous MS4 general Permit, while updating its SWMP document pursuant to this Permit. This Permit does not extend the compliance deadlines set forth in the previous MS4 general Permit unless specifically noted.

The previous SWMP document was review during the preparation of this SWMP. It was concluded that most of the ongoing measurable goals in the old permit were not as detailed as the new permit required minimum measurable goals. Therefore Lindon City has elected to replace the old permit BMPs and have filled out a JUSTIFICATION FOR CHANGES form which is located in Appendix D –Documentation.

The program elements that will be implemented in the six minimum control measures Include a description of how the Lindon City intends to meet the requirements as described in Part 4.0 by referencing the target pollutants and audience, the Permit requirements, a description of the relevant measurable goals, the year by which the Permittee will achieve required actions, including interim milestones and the measure of success (Effectiveness). The six minimum control measures are described in the following MCM List.
<table>
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<tr>
<th>General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)</th>
<th>Measurable Goals</th>
<th>Measure of Success</th>
<th>Required by Permit</th>
<th>Milestone Date</th>
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<td>Audience(s)</td>
<td>MCM 2 Best Management Practices</td>
<td>Measurable Goal</td>
<td>Rationale</td>
<td>Milestone Date</td>
<td>Measure of Success (Effectiveness)</td>
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<tr>
<td>All pollutants</td>
<td>General public</td>
<td>4.2.2.1 Have a program or policy in place that allows for the public to provide input</td>
<td>Notice the public of the city council meeting when the SWMP update will be reviewed according to City noticing process and accept comment at the meeting.</td>
<td>Notifying the SWMP will give the public an opportunity to provide input.</td>
<td>01-Dec-10</td>
<td>Program is notified for City Council meeting on Nov 30th.</td>
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<td>All pollutants</td>
<td>General public</td>
<td>4.2.2.2 Have SWMP document available for public review before it's submitted to the state</td>
<td>Have a hard copy of the draft of the permit available at the city offices before the public hearing.</td>
<td>Required by the Permit</td>
<td>12-Nov-10</td>
<td>SWMP document is available for public review before public hearing.</td>
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<td>All pollutants</td>
<td>General public</td>
<td>4.2.2.3 Have SWMP document available to the public at all times</td>
<td>Post the SWMP on the website within a month from date submitted to State.</td>
<td>Required by the Permit</td>
<td>15-Feb-11</td>
<td>SWMP is updated and posted on the website.</td>
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<td>All pollutants</td>
<td>General public</td>
<td>4.2.2.3 Make updated SWMP document available to the public annually</td>
<td>Post updated SWMP annually on website.</td>
<td>Required by the Permit</td>
<td>Annually</td>
<td>SWMP is updated and posted on the website annually.</td>
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<td>All pollutants</td>
<td>General public</td>
<td>4.2.2.4 Comply with State and Local public notice requirements</td>
<td>Review and document what the State and local public notice requirements are met.</td>
<td>Required by the Permit</td>
<td>01-Dec-10</td>
<td>City recorder certified that the state and local public notice requirements were met and are included in SWMP documentation.</td>
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<td>Pollutant(s)</td>
<td>Audience(s)</td>
<td>MS4 Best Management Practices</td>
<td>Measurable Goal</td>
<td>Rationale</td>
<td>Milestone Date</td>
<td>Measure of Success (Effectiveness)</td>
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<td>All Pollutants</td>
<td>Contractors, Developers, City Council</td>
<td>4.2.3.1. Effectively prohibit, through ordinance or other regulatory mechanism, non-storm water discharges to the MS4, including spills, illicit connections, illegal dumping and sanitary sewer overflows (&quot;SSOs&quot;) into the storm sewer system. Apply escalating enforcement procedures.</td>
<td>Review existing ordinance to conform with IDDE requirements in permit and draft changes to be approved.</td>
<td>Verify that existing ordinance has escalating enforcement procedures.</td>
<td>Aug-11</td>
<td>Ordinance meets the permit requirements</td>
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<td>All Pollutants</td>
<td>Contractors, Developers, City Council</td>
<td>4.2.3.2. Effectively prohibit, through ordinance or other regulatory mechanism, non-storm water discharges to the MS4, including spills, illicit connections, illegal dumping and sanitary sewer overflows (&quot;SSOs&quot;) into the storm sewer system. Apply escalating enforcement procedures.</td>
<td>Update the ordinance to conform with IDDE requirements in permit</td>
<td>Update ordinance as needed</td>
<td>Feb-11</td>
<td>Ordinance is in place and meets the permit requirements</td>
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<td>N/A</td>
<td>Public Works</td>
<td>4.2.3.1</td>
<td>Maintain a current storm sewer system map of the MS4, with locations of outfalls (names and location of all State waters that receive discharges), storm drain pipe and other storm water conveyance structures within the MS4.</td>
<td>Establish policy to maintain a current SD System Map on all new developments</td>
<td>Required by the Permit</td>
<td>1-Jul-12</td>
<td>Policy is in place and meets the permit requirements</td>
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<td>N/A</td>
<td>Public Works</td>
<td>4.2.3.2</td>
<td>Effectively prohibit, through ordinance or other regulatory mechanism, non-storm water discharges to the MS4, including spills, illicit connections, illegal dumping and sanitary sewer overflows (&quot;SSOs&quot;) into the storm sewer system. Apply escalating enforcement procedures.</td>
<td>Implementing policy and have all map updates done within 6 months of final acceptance</td>
<td>Six months will be sufficient time to update the map.</td>
<td>Semi-Annually</td>
<td>90% are input within 6 months</td>
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<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.3.3.1</td>
<td>Develop and implement written systematic procedures for identifying priority areas and listing the following priority areas likely to have illicit discharges</td>
<td>Do Dry weather screening 20% of all outfalls each year</td>
<td>Required by the Permit</td>
<td>Annually</td>
<td>All outfalls have dry weather screening completed</td>
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<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.3.3.2</td>
<td>Field assessment activities for the purpose of verifying outfall locations and detecting illicit discharges, including dry weather screening of outfalls or facilities serving priority areas identified in Part 4.2.3.3.1, as well as routine dry weather screening of all outfalls that discharge within the Permittee's jurisdiction to a receiving water.</td>
<td>Inspect 20% of all priority areas each year</td>
<td>Required by the Permit</td>
<td>Annually</td>
<td>All priority areas are inspected</td>
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<td>All Pollutants</td>
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<td>4.2.3.3.3</td>
<td>Develop and implement standard operating procedures (SOPs) or similar type of documents for tracing the source of an illicit discharge, including visual inspections, and when necessary, opening manholes, using mobile cameras, using field tests of selected chemical parameters as indicators of discharge sources, collecting and analyzing water samples for the purpose of determining sanctions or penalties, and/or other detailed inspection procedures.</td>
<td>Review and implement Dry Weather Screening Checklist(SOP). Utilize visual monitoring form.</td>
<td>Required by the Permit</td>
<td>1-Jul-12</td>
<td>Completed by milestone date</td>
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<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.3.3.5</td>
<td>Develop and implement SOP for characterizing the nature of any illicit discharges found or reported to the Permittee by the hotline developed in 4.2.3.3.4</td>
<td>Create the Incidence Response Flow Chart, IDDE Phone Call Report and IDDE Inspection Report. Train Personnel</td>
<td>The Incidence Response Flow Chart is the most effective way to accomplish the goal.</td>
<td>1-Jul-12</td>
<td>Completed by milestone date and staff is following process</td>
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<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.3.3.6</td>
<td>Develop and implement standard operating procedures for ceasing the illicit discharge</td>
<td>Review flow chart(SOP) and Inspection Report with staff annually.</td>
<td>Required by the Permit</td>
<td>Annually</td>
<td>Training is completed annually for all staff involved in incident reporting.</td>
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<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.3.3.7</td>
<td>Inform public employees, businesses, and general public of hazards associated with illicit discharges and improper disposal of waste</td>
<td>Will meet goal with MCM 1-5 &amp; 7</td>
<td>The goals are the most cost effective way to inform the public and promote behavior change by the public.</td>
<td>Annually</td>
<td>See MCM 1-5 &amp; 7</td>
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<td>Household Hazardous Waste</td>
<td>Residents</td>
<td>4.2.3.3.8</td>
<td>Promote or provide services for the collection of household hazardous waste.</td>
<td>Put the Household Hazardous Waste address and phone number on City Web Site</td>
<td>The goal is the most cost effective way to provide services to the public.</td>
<td>1-Jul-11</td>
<td>Completed by milestone date</td>
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<td>Household Hazardous Waste</td>
<td>Residents</td>
<td>4.2.3.3.9</td>
<td>Remitters shall keep written record of all calls received, all follow-up actions taken, and any feedback received from public education efforts.</td>
<td>Create a spreadsheet for tracking IDDE calls</td>
<td>Required by the Permit</td>
<td>1-Jul-11</td>
<td>Completed by milestone date</td>
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<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.3.3.10</td>
<td>Adopt and implement procedures for program evaluation and assessment, include a database for mapping, tracking of spills or illicit discharges identified and inspections conducted</td>
<td>Create a spreadsheet for tracking Illicit Discharges</td>
<td>The goal is the most cost effective way to meet permit requirements</td>
<td>1-Jul-11</td>
<td>Completed by milestone date</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors, Developers, MS4 staff &amp; City Attorney</td>
<td>Review existing ordinance to meet requirement in Part 4.2.4.1.</td>
<td>Verify the ordinance meets permit requirements regarding construction practices, inspection and escalating enforcement strategies.</td>
<td>Jul-12</td>
<td>When review is completed and list of changes have been documented.</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors, Developers, MS4 staff &amp; City Attorney</td>
<td>Draft changes to ordinance to meet requirement in Part 4.2.4.1.</td>
<td>If changes are needed in the ordinance, draft changes to ordinance.</td>
<td>Feb-11</td>
<td>Completed by milestone date</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors, Developers, MS4 staff &amp; City Attorney &amp; City Council</td>
<td>Submit ordinance changes to City Council for approval.</td>
<td>If changes are needed in the ordinance, submit ordinance to the City Council.</td>
<td>Feb-12</td>
<td>Completed by milestone date</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors, Developers, MS4 staff, City Attorney &amp; City Council</td>
<td>Develop and begin using a construction site enforcement action log/database</td>
<td>Use of spreadsheet log is an appropriate method for tracking of all enforcement actions.</td>
<td>Feb-12</td>
<td>We have a log and are using it</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Develop checklist and begin to do pre-construction reviews of SWPPP.</td>
<td>Required by the Permit.</td>
<td>Feb-12</td>
<td>We are conducting SWPPP reviews</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Develop a policy to consider potential water quality impacts on all projects - private or municipal.</td>
<td>Required by the Permit.</td>
<td>Feb-12</td>
<td>We are using water quality impacts checklist</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Develop a policy to consider Low Impact Development practices on all projects - private or municipal.</td>
<td>Required by the Permit.</td>
<td>Feb-12</td>
<td>We are using UDO checklist</td>
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<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Develop a &quot;priority construction site&quot; map showing areas within the city where &quot;additional&quot; protection may be desired.</td>
<td>Required by the Permit.</td>
<td>Jul-12</td>
<td>When map is completed and ready for use</td>
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<tr>
<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Conduct monthly inspections of all construction sites.</td>
<td>Required by the Permit.</td>
<td>Annually</td>
<td>90% of all active construction sites are inspected monthly</td>
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<tr>
<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors, developers and MS4 staff</td>
<td>Provide SWPPP training annually to staff members involved with construction activities.</td>
<td>Required by the Permit.</td>
<td>Annually</td>
<td>Completed by milestone date</td>
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<tr>
<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors, developers and MS4 staff</td>
<td>Develop a written Notice of Termination process for use within the city.</td>
<td>It was determined that annual training would accomplish the permit requirements for this goal</td>
<td>Feb-10</td>
<td>Completed by milestone date</td>
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<tr>
<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Train SWPPP inspectors, their supervisors, and any personnel who grant final occupancy permits or the NTO process.</td>
<td>Required by the Permit.</td>
<td>Feb-10</td>
<td>Completed by milestone date</td>
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<tr>
<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Inspect high priority sites bi-weekly.</td>
<td>Required by the Permit.</td>
<td>Annually</td>
<td>90% of priority construction sites are inspected bi-weekly</td>
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<tr>
<td>Sediment, Construction Site Debris, Hydrocarbons</td>
<td>Contractors and Developers</td>
<td>Establish an active construction sites log.</td>
<td>Required by the Permit.</td>
<td>Feb-12</td>
<td>Construction sites are recorded in the log</td>
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<tr>
<td>Pollutant(s)</td>
<td>Audience(s)</td>
<td>MCM 5 Best Management Practices</td>
<td>Measurable Goal</td>
<td>Rationale</td>
<td>Milestone Date</td>
<td>Measure of Success (Effectiveness)</td>
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<tr>
<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.5.1. Develop and adopt an ordinance or other regulatory mechanism that requires long-term post-construction storm water controls at new development. (4.2.5.3.1 for flood control structure issues and 4.2.5.3.2 for LID)</td>
<td>Review existing ordinance to determine if it meets new post-construction requirements. Use checklist from coaching sessions</td>
<td>Verify the ordinance meets permit requirements regarding long-term post-construction storm water controls at new development.</td>
<td>Mar-11</td>
<td>Review is complete</td>
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<tr>
<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.5.2 Develop and define specific hydrologic methods or methods for calculating runoff volumes and flow rates.</td>
<td>Draft post-construction ordinance revisions</td>
<td>If changes are needed in the ordinance, draft changes to ordinance.</td>
<td>Jul-11</td>
<td>Draft is complete and ready for others to review</td>
<td></td>
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<tr>
<td>All Pollutants</td>
<td>All Audiences</td>
<td>4.2.5.3.3 The Permittee must develop a plan to retrofit existing developed sites that are adversely impacting water quality.</td>
<td>Update storm drain master plan and capital improvement plan to include water quality.</td>
<td>Required by the Permit</td>
<td>Dec-10</td>
<td>CP includes water quality projects</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, City Council</td>
<td>4.2.5.3.4 Each Permittee shall develop and define specific hydrologic methods or methods for calculating runoff volumes and flow rates.</td>
<td>Review existing design standards to see if they meet new post-construction requirements. See section 4.2.5.14.</td>
<td>Update the design standards if needed.</td>
<td>Sep-11</td>
<td>Standards have been reviewed and comments made</td>
<td></td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.4.1 Review storm water pollution prevention plans (SWPPP) for, at a minimum, all new development and redevelopment sites to ensure that the plans include long-term storm water management measures that meet the requirements of this minimum control measure.</td>
<td>Review Storm Water Pollution Prevention Plans (SWPPPs) for</td>
<td>Required by the Permit</td>
<td>Feb-12</td>
<td>BMP Factsheets are adopted</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.5.1 The ordinance or other regulatory mechanism shall include provisions for both construction phase and post-construction access for Permittees to inspect storm water control measures on private properties that discharge to the MS4 to ensure that adequate maintenance is being performed.</td>
<td>Develop maintenance agreement or similar type of documents for storm inspection and enforcement of post-construction storm water control measures.</td>
<td>Required by the Permit</td>
<td>Dec-12</td>
<td>List of preferred method(s) is compiled</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.5.2 Permittees shall provide developers, and contractors with preferred design specifications for a more effective storm water for different development types projects located in adjacent to, or discharging to environmentally sensitive areas.</td>
<td>Develop preferred method(s) of treating storm water for high impact sites.</td>
<td>Required by the Permit</td>
<td>Dec-12</td>
<td>BMP Factsheets are an effective way to ensure understanding of long-term mechanisms for protecting water quality.</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.5.3 Permittees shall keep an representative copy of information that is provided to design professionals, etc. the dates of the mailings and lists of recipients.</td>
<td>Put packet information on the website including information on the City website is an effective way to provide packets to design professionals.</td>
<td>Required by the Permit</td>
<td>Annually</td>
<td>The packet is located on the website</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.6 Inspections and any necessary maintenance must be conducted annually by either the Permittee or through a maintenance agreement, the property owner/operator. On sites where the property owner/operator is conducting maintenance, the Permittee shall inspect those storm water control measures at least once every five years.</td>
<td>Review and customize SOPs for inspection and enforcement of post-construction storm water control measures.</td>
<td>Required by the Permit</td>
<td>Jul-11</td>
<td>Inspection and enforcement SOPs are current and being utilized</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.7 Maintaining an inventory of postconstruction BMP’s</td>
<td>Inventory post-construction BMPs – see 4.2.5.7.1 for inventory inclusion items</td>
<td>Inventory is complete</td>
<td>Dec-11</td>
<td>Inventory is complete</td>
<td></td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.8.1 Identify who is responsible to inspect and/or maintain each post-construction BMP.</td>
<td>Identify person responsible for inspection and maintenance.</td>
<td>Required by the Permit</td>
<td>Dec-11</td>
<td>List identifies person responsible for inspection and maintenance</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.8.2 Develop inspection report form for post-construction BMPs.</td>
<td>Required by the Permit</td>
<td>Feb-12</td>
<td>Form is completed</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.8.3 Conduct inspections annually for all post-construction BMPs.</td>
<td>Conduct inspections annually for all post-construction BMPs.</td>
<td>Required by the Permit</td>
<td>Feb-12</td>
<td>Completed inspection reports are property filed</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff, Contractors, and Developers</td>
<td>4.2.5.8.4 Conduct inspections on privately maintained post-construction BMP’s at least 20% per year.</td>
<td>Conduct inspections on privately maintained post-construction BMP’s at least 20% per year.</td>
<td>Required by the Permit</td>
<td>Feb-12</td>
<td>Completed inspection reports are property filed</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff</td>
<td>4.2.5.9 Conduct inspections on privately maintained post-construction BMP’s at least 20% per year.</td>
<td>Conduct inspections on privately maintained post-construction BMP’s at least 20% per year.</td>
<td>Required by the Permit</td>
<td>Feb-12</td>
<td>Completed inspection reports are property filed</td>
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<td>All Pollutants</td>
<td>MS4 staff</td>
<td>4.2.5.10 Schedule and conduct training for appropriate personnel.</td>
<td>Schedule and conduct training for appropriate personnel.</td>
<td>Required by the Permit</td>
<td>Annually</td>
<td>All appropriate personnel are trained</td>
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<tr>
<td>All Pollutants</td>
<td>MS4 staff</td>
<td>4.2.5.11 Maintain an inventory of post-construction BMP’s</td>
<td>Inventory is updated annually</td>
<td>Required by the Permit</td>
<td>Annually</td>
<td>Log is updated</td>
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<td>MCM</td>
<td>Measurable Goal</td>
<td>Measure of Success (Effectiveness)</td>
<td>Achievable</td>
<td>Audible(s)</td>
<td>Required by the Permit</td>
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<td>MCM 6</td>
<td>Pollution Prevention and Good Housekeeping for Municipal Operations</td>
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<td>4.2.6.1</td>
<td>Permitees shall develop and keep current a written inventory of all Permittee-owned or operated facilities</td>
<td>Documentation has been received or</td>
<td>MS4 staff</td>
<td>All pollutants</td>
<td>Required by the Permit</td>
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<td>4.2.6.2</td>
<td>Permitees shall develop, implement, and maintain a program to determine which runoff shall be considered storm water</td>
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<td>4.2.6.3</td>
<td>Permittees shall develop, implement, and maintain a program to determine those facilities or areas that have the potential to discharge storm water</td>
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<td>4.2.6.4</td>
<td>Each &quot;high priority&quot; facility identified in Part 4.2.6.3. must develop facility-specific standard operating procedures (SOPs) or similar type of documents.</td>
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<td>4.2.6.5</td>
<td>If a Permittee contracts with a third-party to conduct municipal storm water inspections, the Permittee shall require the contractor to be familiar with the Permit requirements and to contract with a third-party that is capable of performing storm water inspections.</td>
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<td>4.2.6.6</td>
<td>Quarterly visual observation of storm water discharges: At least once per quarter, a comprehensive inspection of &quot;high priority&quot; facilities, including all storm water discharges at high priority facilities, must be performed.</td>
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| 4.2.6.7 | Existing flood management structural controls shall be assessed to 
| 4.2.6.8 | The Permittee must develop and implement a program to assess the water quality impacts on all new flood management structural controls. |
| 4.2.6.9 | Permittee shall provide training for all employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.10 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.11 | Draft is prepared andready for implementation by milestone date. |
| 4.2.6.12 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.13 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.14 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.15 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.16 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.17 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.18 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.19 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
| 4.2.6.20 | The Permittee must develop and implement a program to develop, implement and maintain training programs for employees who have primary responsibilities for all departments shown in the permit. |
**Budget**

Part 4.1.2.2 obligates the Permittee to secure the resources necessary to meet all requirements of this permit. Each Permittee must conduct an annual analysis of the capital and operation and maintenance expenditures needed, allocated, and spent as well as the necessary staff resources needed and allocated to meet the requirements of this permit, including any development, implementation, and enforcement activities required. Each permittee must submit a summary of its fiscal analysis with each annual report.

As previously discussed, a line item was created in the MCM List that estimated the cost for each measurable goal. Due to the August 1, 2010 release date of the Permit, the 2010 – 2011 Fiscal Budget was based on the 2005 Permit activities. The probable cost will be included in the each fiscal budget starting in 2011 – 2012 Storm Water Budget to be reviewed by the City Council.

During the development of the cost for each goal in the MCM List, assumptions were made related to the number of existing developments and the rate of new developments that we made in estimating costs of implementing the SWMP. They are not based on any inventory, but just speculations at this stage. They have been list below.

- There will be an average of 15 new developments completed per year; 10 of them will be high priority or sensitive sites; the average duration that these construction sites are active will be 12 months.
- There will be an average of 25 new sites per year that will be separate parts of a larger common plan of development or sale (which are not included already included in the 15 developments estimated above); none will be high priority sites; the average duration that these construction sites are active will be 8 months.
- There are 250 existing sites for which storm water control measures need to be inspected; 50 of them will be priority sites.
- There will be 4 high priority publicly maintained facilities.
- Follow-up inspections will be required at a rate of 10% of the total number of inspections.
- Residential lots inspections - 8 inspections on 25 lots each year with a 10% follow-up inspection rate would equal 220 hours per year.

The labor cost assigned to the man hours assumed is $75. This cost includes wages, benefits, equipment and overhead.

The total planned probable cost for the program as identified in this document is $609,150. It is anticipated that the first annual analysis of the capital and operation and maintenance expenditures required by the Permit will be submitted with the Annual Report in October 2011.

**Shared Responsibilities**

Part 4.3 states that Implementation of one or more of the six minimum measures may be shared with another entity or the entity may fully take over the measure.

Lindon City shares some of the Public Education and Outreach on Storm Water Impacts with Utah County. The interlocal agreement describing how the responsibilities are shared is included in Appendix F.
APPENDIX A

Supplemental Guide to Storm Water Management for Contractors

This appendix A is intended to be part of the SWMP yet removable for Contractors

- Storm Water Performance Criteria and Design Guidelines
- Storm Water Pollution Prevention Plan (SWPPP) Requirements
- Low Impact Development Techniques
- Special Environmental Considerations
- SWPPP Preconstruction Submittal and Review Checklist
- Long Term Storm Water Pollution Prevention and Maintenance Plan Requirements
- Standard Details
- SWPPP Inspection Checklist
- SWPPP Construction Inspection Forms (August 2010 version from State DEQ)
- Maintenance Agreement
- Inspection Authority (Lindon Code 13.23.100 and 13.23.180)
- Enforcement Procedures (Lindon Code 13.23.120 and 13.23.260)
- Notice of Termination (NOT) Procedures
- Construction and Post Construction Best Management Practices (BMP) Fact Sheets
APPENDIX B

Supplemental Guide to Storm Water Management for Public Works

This appendix B is intended to be part of the SWMP yet removable for PW Personnel

- Standard Operating Procedures (SOP) including department and/or responsible parties
- Buildings and Vehicles
  - Dumpsters/ Garbage Storage
  - Parking Lot Maintenance
  - Fueling
  - Vehicle and Equipment Storage
  - Washing
- IDDE
  - Call-in Inspections
  - Opportunistic Illicit Discharge Observation
  - Outfall Inspections
  - Removing Illicit Discharges
  - Tracing Illicit Discharges
- Parks
  - Chemical Application Pesticides, Herbicides, Fertilizers
  - Cleaning Equipment
  - Mowing and Trimming
  - Open Space Management
  - Pet Waste
  - Planting Vegetation (Starters)
  - Planting Vegetation (Seeds)
  - Transporting Equipment
- Streets/Storm Drain
  - Catch Basin Cleaning
  - Curb Painting
  - Detention Pond Cleaning
  - Creek Management
  - Ditch Management
  - Chip Seal
  - Slurry Seal
  - Overlays and Patching
- Water
  - Crack Seal
  - Shouldering and Mowing
  - Secondary Road Maintenance
  - Concrete Work Garbage Storage
  - Snow Removal and
  - De-icing
  - Street Sweeping
  - Transporting Soil and Gravel
- BMP Fact Sheets
- SWPPP Review SOP
- Process for including water quality in city projects
- Inspection Check list
- Assessment of city owned facilities
- NOT Procedures
- Retrofitting Existing Infrastructure
- Construction Inspection Form (from State)
APPENDIX C

IDDE Program

☐ Justification of Priority Area List
☐ Priority Area Log
☒ IDDE Procedures Flow chart
☒ Dry Weather Screening SOP
☒ Telephone call-in Response Procedure
☐ IDDE BMP Fact Sheets
☐ Inspection Report Inventory
APPENDIX D

Documentation

☒ Inspection Forms (Construction and Public Facilities)
☒ Enforcement Actions
☐ Training Schedule
☒ Training Log
☒ Visual Monitoring Forms
☐ Maintenance Records
☐ Annual Reports
☒ Justification for changes
☐ Public Education Activities
☐ BMP Fact Sheets
APPENDIX E

City Ordinances

☒ General Stormwater
☐ Construction
☐ Post Construction
APPENDIX F

State/City Permits

☐ State General Permit
☒ Construction General Permit
□ Maintenance Agreements
☒ Interlocal Agreements
APPENDIX G

Maps/Map Book

- Collection System
- Floor Drains
- Facility Storm Drain Maps
- City Owned Facilities Inventory
- Post Construction BMPs
- Outfalls Inventory
- Active Construction Sites Inventory
- Spills
- Enforcement Action Log
- Monitoring Locations Inventory