

Perry City

Storm Water Management Plan



November 2021

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1. Introduction

Purpose

The purpose of the Perry City Storm Water Management Program (SWMP) is for the development and implementation of the City's Plan to fulfill requirements under the State of Utah Small MS4 General UPDES Permit No. UTR090000 (Renewal Permit) in accordance with Section 402(p)(3)(B) of the *Federal Clean Water Act*, and the State of Utah Storm Water Regulations (UAC R317-8-3.9). This plan details the actions that Perry City proposes to take between November 1, 2021 and November 1, 2025.

The NPDES Program

The National Pollutant Discharge Elimination System (NPDES) is a program created under the Federal Clean Water Act with the intent of protecting and restoring water quality in lakes and streams so they can support "beneficial uses" such as fishing and swimming. Governmental and private entities wishing to discharge water or wastewater to surface water regulated by the Federal Government (Waters of the US) must obtain permits and comply with certain conditions or face fines and other penalties. In general, the Storm Water Program regulates storm water discharges from three potential sources: municipal separate storm sewer systems, construction activities, and industrial activities.

In Utah, the US Environmental Protection Agency has delegated the authority over NPDES permits to the Utah Department of Environmental Quality – Water Quality (DEQ). DEQ has issued a General Permit for discharges to waters of the State of Utah resulting from a Small Municipal Separate Storm Sewer System (Small MS4). The General Permit applies to cities with a population less than 100,000 (based on the 2010 census), located within an urbanized area, and that operate a MS4 which discharges to a water of the State of Utah.

UPDES Small MS4 Permit

Perry has been identified as a Small MS4 permittee and therefore must establish a stormwater program that complies with conditions of the UPDES MS4 Permit UTR090000. The Permit allows municipalities to discharge stormwater from systems it owns and operates into "waters of the state" such as rivers, lakes, streams, and groundwater as long as they implement six (6) minimum control measures (MCM) to reduce pollutants in stormwater to the "maximum extent practicable." The MCM's are as follows:

1. Public Education and Outreach on Stormwater Impacts (*General Permit 4.2.1*)
2. Public Involvement / Participation (*General Permit 4.2.2*)
3. Illicit Discharge Detection and Elimination (IDDE) (*General Permit 4.2.3*)
4. Construction Site Stormwater Runoff Control (*General Permit 4.2.4*)
5. Long-Term Stormwater Management in New Development and Redevelopment (Post-Construction Stormwater Management) (*General Permit 4.2.5*)
6. Pollution Prevention and Good Housekeeping for Municipal Operations (*General Permit 4.2.6*)

The SWMP will be reviewed, at a minimum, on an annual basis, and any changes or modifications will be described and submitted to the DEQ. In addition, the Permit requires the City to submit an Annual Compliance Report by October 1st of each year that details actions taken in the previous year to achieve compliance. The full text of the Permit can be viewed at: <https://documents.deq.utah.gov/water-quality/facilities/general-storm-water-permit-common-plan/DWQ-2021-008110.pdf>

General System Overview

Perry City is in the southeastern section of Box Elder County. The population of the community was 5,555 at the 2020 census. The city has a total area of 8 square miles and is largely residential and agricultural with a minimal amount of commercial development.

The storm drain system is composed of pipes, detention basins, and ditches.

Current and Planned Activities

The SWMP Plan describes the set of actions and activities the City has implemented or plans to implement to maintain permit compliance. The Plan is organized to address the program components noted in Section 4.2 of the Permit.

The following sections of the SWMP Plan describe how Perry is currently meeting the requirements of the Permit, and how the City plans to continue to meet those requirements over the next five (5) years.

Coordination and Responsibilities

Compliance with the Permit requires coordination and documentation of activities between several City departments, the Bear River Health Department, and the Storm Water Coalition. The Public Works Department will coordinate City efforts and will meet with staff from other departments and entities regularly to verify that current and planned activities meet Permit requirements. Activities required for Permit compliance will be carried out by the Public Works, Planning and Building, Parks, City Administration, Finance, Fire, Police, and the Bear River Health Department.

Main Point of Contact:

Taylor Clark
Storm Water
435-723-6461
Taylor.clark@perrycity.org

COVID-19 Considerations

Perry has been following the public health guidance provided by the Local and State Health Departments for phased re-opening. The functioning of the stormwater system has been deemed essential and compliance with the Permit is expected to remain on track. Additional safety measures have been put in place to protect the staff. Where appropriate or applicable, the City will conduct virtual and/or socially distanced meetings. A new section for COVID-19 considerations has been added to each section of this Plan and details considerations for each program, as best as can be determined in this evolving situation. Visit the City's website for more information about the City's response to COVID-19.

Table 1. Permit Requirements Deadlines / Frequencies

General Permit Section	Year (by Quarter)		2021		2022				2023				2024				2025			
	Requirements	Deadline/ Frequency	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
4.1	Stormwater Management Program Plan																			
	Review / Update SWMP	Update 11/1/2021 Review annually		X				X				X				X				X
	Annual Compliance Report	Oct. 1, annually	X				X				X				X				X	
	Track SWMP Costs	Ongoing	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
4.2.1	Public Education and Outreach																			
	Regional Participation	Ongoing	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	General Awareness	Ongoing	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Education and Outreach Training(s)	Annually		X				X				X				X				X
4.2.2	Public Involvement / Participation																			
	Bi-Annual Public Hearing	Bi-Annually		X		X		X		X		X		X		X		X		X
4.2.3	Illicit Discharge Detection and Elimination																			
	Develop / Update database and SOPs	7/31/2022, quarterly					X				X				X				X	
	Inspect 25% of the System	Annually (throughout)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Employee Training	Annually			X				X				X				X			
4.2.4	Construction Site Stormwater Runoff Control																			
	Tracking and record keeping	Ongoing	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Develop / Update SOPs	7/31/2022					X													
	Employee Training	Annually		X				X				X				X				X
4.2.5	Long-Term Stormwater Management in New Development and Redevelopment																			
	Update Public Works Standards	Review Annually			X				X				X				X			
	Develop Source Control Program	7/31/2023									X									
	Agreements / List of Private Detention Basins	Ongoing	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
4.2.6	Pollution Prevention and Good Housekeeping for Municipal Operations																			
	Develop a SWPPP for each City-owned Site	4/30/2022				X														
	Develop / Update SOPs	7/31/2022				X														

Table 2. Inspections (General)

General Permit Section	Area / Type	Frequency
4.2.3 Illicit Discharge Detection and Elimination	High-Priority Areas	Annual
	Dry Weather Screening	Every 5 Years
4.2.4 Construction Site Stormwater Runoff Control	Priority Construction Sites	Bi-Weekly
	Construction Sites	Monthly
4.2.5 Long-Term Stormwater Management	City-Owned High-Priority / Visual	Monthly
	Structural BMPs	Bi-Annual
	New Construction Structural / Permanent BMPs	Annual
4.2.6 Pollution Prevention and Good Housekeeping for Municipal Operations	City-Owned High-Priority /Comprehensive	Bi-Annual

2. Public Education and Outreach on Stormwater Impacts – MCM 1

Perry provides and participates in a variety of stormwater education and outreach programs designed to build general awareness; reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts; and encourage the public to participate in stewardship activities. The City aims to educate and reach a variety of audiences including residents, institutions and commercial facilities, developers and contractors (construction), and MS4-owned and operated facilities.

Perry's Plan to Meet the Requirements of the Permit *(General Permit 4.2.1)*

Areas of Focus

- **Regional Participation:** Perry is an active participant in regional education and outreach programs.
 - Perry will continue to coordinate with other permittees in Northern Utah through the Golden Spike Stormwater Coalition and the Bear River Health Department.
 - Perry participates in the Coalition's annual Water Fair. The Fair engages 4th grade youth through hands-on learning to explore water conservation and quality issues. The educational experience is developed to meet the needs of State education standards and multiple schools throughout the County participate in the event.
 - Perry participates in the cost of local TV advertisements. These advertisements are broadcast throughout the region.
- **General Awareness Programs:** Perry will continue to provide general awareness education and outreach programs for a variety of target audiences.
 - General awareness promotion through a variety of media including utility bill inserts, direct mail, direct outreach, social media, or fliers.
 - Installation and/or replacement of curb markers on catch basins throughout the city.
 - Updates to the City's Stormwater webpage to include helpful information and activities to prevent pollution in our stormwater.
 - Technical assistance and outreach to businesses for managing potential sources of pollutants on their property.
- **Education and Outreach (Training):** Perry will continue to provide education and outreach for a variety of target audiences.
 - Provide annual training opportunity for institutions, industrial, and commercial facilities about illicit discharges and improper disposal of waste and the impacts to water quality associated with these types of discharges.
 - Provide education to engineers, construction contractors, developers, development review staff, and land use planners concerning the development of stormwater pollution prevention plans (SWPPPs) and Best Management Practices (BMPs) use to reduce adverse impacts from stormwater runoff from development sites.
 - Provide education to city staff, development and plan review staff, land use planners and other pertinent parties about Low Impact Development (LID) practices, green infrastructure practices, and the specific requirements for post-construction control and the associated Best Management Practices (BMPs) chosen within the SWMP.

Specific Goals with Methods of Evaluation and Rationale

To ensure Perry is meeting the requirements of the Public Education and Outreach – MCM 1 section of the General Permit, the following specific goals have been established.

- **Regional Participation Goal:** Perry will actively participate in regional coordination and public outreach efforts by attending at least 75% of the Golden Spike Stormwater Coalition Meetings and providing 100% (of the determined share) monetary support towards regional public outreach efforts.

Methods of Evaluation:

- Attendance records.
- Meeting minutes.
- Proof of monetary support of coalition costs.

Rationale: By working together with partners within the Region, larger efforts (such as TV and radio advertisements) are financially possible for the City to participate in.

- **General Awareness Programs Goal:** On an annual basis, Perry will provide information and promote stormwater awareness through a variety of methods and on a variety of topics.

Methods of Evaluation:

- Copies of information sent and documentation of when and where sent.
- Documentation of number of curb markers installed / replaced.
- Photos.

Rationale: By using a variety of methods, the City will be able to reach a larger audience – some people may receive the message multiple times, while others may only receive the information once.

- **Education and Outreach (Training) Goal:** On an annual basis, Perry will either attend or host a training for each of the areas as described in the associated bulleted list above.

Methods of Evaluation:

- Attendance rolls.
- Copies of presentation / training materials.

Rationale: By providing training to all of these entities, it will ensure that each is staying up-to-date with BMPs and the latest issues and topics.

Record Keeping: Perry will continue to track and maintain records of public education and outreach activities and summarize these activities in the Annual Compliance Report.

3. Public Involvement / Participation – MCM 2

Perry is committed to providing ongoing opportunities for the public to provide input into the development of the SWMP and into other initiatives and plans designed to improve water quality.

Perry's Plan to Meet the Requirement of the Permit *(General Permit 4.2.2)*

Areas of Focus

- **Opportunities for Public Input:** The City welcomes comments from the public throughout the year.
 - To facilitate public comment, Perry will provide a copy of the SWMP, contact information, and basic stormwater practices on the City's Stormwater webpage.
 - The public is notified and invited to attend City Council Meetings related to the development, implementation, and updates to the SWMP and related Ordinances. Notice for these meetings is done in compliance with all current State and City noticing requirements.
 - Perry also seeks to involve the public in other stormwater management and clean water related decisions by engaging people during the planning of stormwater infrastructure projects and during development of stormwater related policy and master plans.
- **Accessibility:** A copy of the SWMP will be available online and in print at City Hall.
- **Transparency:** In general, all documents related to stormwater management are public record and available under the Government Records Access Management Act (GRAMA).

Specific Goals with Methods of Evaluation and Rationale

To ensure Perry is meeting the requirements of the Public Involvement/Participation - MCM 2 section of the General Permit, the following specific goal has been established.

- **Opportunities for Public Input Goal:** Bi-Annually, Perry City will hold a public hearing to obtain public comments related to stormwater.

Methods of Evaluation:

- Copies of public notices issued.
- Meeting minutes.

Rationale: Public comments will be welcome anytime of the year. By holding public hearings twice per year, there will be a specific opportunity for the public to provide input to the City.

Record Keeping: Perry will continue to track and maintain records of public involvement and participation activities and summarize these activities in the Annual Compliance Report.

4. Illicit Discharge Detection and Elimination – MCM 3

Perry's Illicit Discharge and Elimination (IDDE) program is designed to prevent contamination of surface water and groundwater by monitoring, tracking, and removing non-stormwater discharges into the stormwater drainage system.

Perry's Plan to Meet the Requirement of the Permit *(General Permit 4.2.3)*

Areas of Focus

- **Ongoing IDDE program to detect and address non-stormwater discharges and illicit connections:** The City's on-going IDDE program is designed to characterize, trace the source, and eliminate illicit discharges, including spills and illicit connections, into the municipal stormwater system.
 - In conjunction with the Bear River Health Department, Public Works responds to and investigates all calls and report regarding environmental concerns such as illegal dumping, spills, illicit discharges, and illicit connections.
 - Spills Hotline: Perry City utilizes the hotline provided by the Bear River Health Department (435-734-0845) for reporting of spills and water quality concerns such as illegal dumping, and is publicized as a 24-hour, 7-days a week hotline.
 - During regular business hours, calls are received by City Hall and followed up on by the Public Works Staff.
 - After-hours calls are managed by Bear River Health Department in conjunction with the on-call Public Works Staff.
 - Perry investigates all calls received and records are kept of calls received and actions taken because of these calls.
 - The hotline is publicized and promoted on the City's website and part of information distributed.
 - Perry takes pride in exceeding permit requirements of IDDE program response and in most cases spill responses and investigation is performed the day of reporting.
 - Documentation of IDDE procedures will be detailed in the City's IDDE Standard Operating Procedures (SOP) Manual.
 - Perry educates public employees, businesses, and the public about illicit discharges and hazards associated with improper disposal of waste through the various methods as described in the "Public Education and Outreach" Section.
 - Perry City keeps an updated stormwater system map that identifies all of the outfalls and priority areas (as determined by the City).
 - Perry City's website promotes services for the collection of household hazardous waste provided by Box Elder County Landfill.
- **Perry Municipal Code 7.13 Storm Drainage:**
 - Perry Municipal Code 7.13 prohibits non-stormwater, illicit discharges into Perry's stormwater system and provides the regulatory authority and framework for enforcement. These code sections are updated periodically to support the SWMP.
 - Code Implementation:
 - The on-going IDDE compliance strategy strives to achieve compliance initially through public education and technical assistance. When education, technical

- assistance, and voluntary correction agreements do not achieve compliance, 7.13.140 provides for progressive enforcement.
- Pollution discharged into the municipal storm drain system and/or surface and ground waters (illicit discharges) violate 7.13 and subjects the violator(s) to fines and/or cleanup costs imposed by the City and/or State agencies (7.13.140).
- **MS4 Screening:** Perry has an on-going program to screen the stormwater system for potential sources of non-stormwater discharges and illicit connections. Perry performs this screening through outfall inspection. During each inspection, Staff observe the structural integrity of the outfall and its adjoining pipes, sediment accumulation levels, and if there is any unusual flow, odor, color, or other visual indicators that would suggest a pollutant is present. If there is a water quality concern, the Staff will then report a spill through the spill hotline. This will trigger notification to the storm maintenance crew to respond and maintain storm structures and the water quality team for further investigation and follow up.
- Perry screens on average 33% of the stormwater outfalls each year and annually tracks the percentage screened as well as the total percentage screened, beginning January 2022.
 - Outfalls are screened at a minimum of once every five (5) years.
- **Training:** Perry has an on-going training program for City Staff on the identification, reporting, and response to illicit discharges into the municipal stormwater system. All new employees receive training within 60 days of hire.

Specific Goals with Methods of Evaluation

To ensure Perry is meeting the requirements of the Illicit Discharge Detection and Elimination – MCM 3 section of the General Permit, the following specific goals have been established.

- **Ongoing IDDE Efforts Goal:** Perry will develop and keep a database and update written SOPs for all inspections, spills, illicit discharges, and illicit connections. The database development and SOP updates will be completed by July 2022 and maintained on an ongoing basis thereafter.

Methods of Evaluation:

- Inspection Logs.
- Spills, Illicit Discharge, Illicit Connection Tracking Sheets.
- Photos.
- SOP Manual.

- **MS4 Screening Goal:** Perry will inspect 33% of the stormwater outfalls on an annual basis.

Methods of Evaluation:

- Inspection Logs.

- **Training Goal:** Perry will provide annual training to all employees on illicit discharge and illicit connection detection. All new employees shall receive individual / small group training within 60 days of the date of hire.

Methods of Evaluation:

- Attendance Rolls.
 - Presentation Materials.
-

Record Keeping: Perry will continue to track and maintain records of illicit discharge detection and eliminations activities and summarize these activities in the Annual Compliance Report. *Bear River Health Department, HAZMAT, and other responding Agencies track and maintain their own separate records.*

5. Construction Site Stormwater Runoff Control – MCM 4

Perry reviews development plans and inspects development sites during construction to ensure erosion and sediment control best management practices are in place and stormwater facilities are installed and maintained as designed.

Perry's Plan to Meet the Requirement of the Permit *(General Permit 4.2.4)*

Areas of Focus

- **Ongoing Program for Stormwater Management Standards for Development, Redevelopment, and Construction Sites:** The program applies to private and public development, including infrastructure projects.
 - Perry Code 7.17 requires stormwater construction activity permits, NOIs, SWPPPs, and BMPs to be put in place.
- **Review Plans and Inspect Construction Sites:**
 - Perry reviews all permits and development plans, inspects sites during construction, and takes enforcement action against those failing to follow approved guidelines or to provide facilities as required in the approved plans.
 - The review process includes civil/site plan review, an approval process (as required in City Code Title 14 Subdivision and Title 7 Public Service Ordinances, inspections, and enforcement to meet standards established by the permit for qualifying new and redevelopment sites. The City's oversight of new and redevelopment occurs in phases: (1) prior to construction during the plan review and acceptance process; (2) before the site is cleared during an initial site construction inspection; (3) during construction via construction site inspections; and (4) post construction as part of the stormwater infrastructure acceptance inspection. Proposals for public and private projects are reviewed by the City Engineer for compliance with Perry's Standards, including LID requirements. City staff inspect qualifying public and private construction sites on a continuous basis to ensure the proper temporary erosion and sediment control measures have been selected, properly placed, and installed correctly.
 - City Inspectors inspect the stormwater drainage system that can potentially be impacted by development construction activity. This occurs, at a minimum, every month until the development has been built-out or when construction has stopped, and the site is stabilized. If facilities and stormwater conveyance require cleaning during home construction, responsible parties perform maintenance / cleaning.
 - Perry Inspectors have the authority to enforce the Perry City Code, as stated in Title 7 Public Service Ordinances and Title 14 Subdivisions, using corrective action notices and stop work orders, to ensure the protection of receiving waters from construction impacts.
- **Notice of Intent:** Perry will continue to provide links to the "Notice of Intent for Construction Activity" and "Notice of Intent for Industrial Activity" to applicants as part of the development and redevelopment permit / approval process.
- **Training:** All Staff whose primary job duties are related to implementing the construction storm water program, including permitting, plan review, construction site inspections, and enforcement are annually trained to conduct these activities.

Specific Goals with Methods of Evaluation

To ensure Perry is meeting the requirements of the Construction Site Stormwater Runoff Control – MCM 4 section of the General Permit, the following specific goals have been established.

- **Review Plans and Inspect Construction Sites Goal:** Perry will keep accurate records of construction sites reviewed and approved, and construction sites evaluated and inspected, and any enforcement actions taken.

Methods of Evaluation:

- Database Tracking Developments (Reviewed, Approved, Completed).
 - Pre-Construction SWPPP Review Checklists.
 - Pre-Construction Attendance Rolls / Meeting Notes.
 - Inspection Logs.
 - Enforcement Tracking Log.
- **SOP and Checklist Goal:** By July 2022, Perry will develop / update and begin utilizing SOPs for inspections and stormwater enforcement of construction sites.

Methods of Evaluation:

- SOP Manual.
- Checklists.

Record Keeping: Perry will continue to track and maintain records of actions related to controlling runoff from development, redevelopment, and construction sites and summarize these activities in the Annual Compliance Report.

6. Long-Term Stormwater Management – MCM 5

The Long-Term Stormwater Management (Post-Construction Stormwater Management) in New Development and Redevelopment is designed to prevent and reduce pollutants in runoffs from areas of existing development and newly constructed development that discharge to the stormwater system by implementing an educational program, inspection routine, and enforcement process. The City is actively taking steps to be prepared to deploy the full inspection program by July 2023. In addition, the City requires the use of Low Impact Development (LID) stormwater practices and principles.

Perry's Plan to Meet the Requirement of the Permit (*General Permit 4.2.5*)

Areas of Focus

- **Post-Construction Control Standards / Ordinance:** Perry Code 7.19.020 and 7.13 adopts Standards to prevent or minimize impact to water quality – these include structural and non-structural BMPs to address pollutants known to be or have the potential to be discharged from the site.
- **Method for Calculating Hydrology:** To ensure consistent sizing of structural BMPs, Perry Code 7.19.020 defines the specific hydrology method(s) for calculating runoff volumes and flow rates. In September 2021, the City updated their current Public Works Standards to include these requirements and the new updates found in the General Permit requirements 4.2.5.1.2.
- **Low Impact Development (LID) Practices:** Perry Code 7.19.060 adopted the Utah Department of Environmental Quality (UDEQ) “A Guide to Low Impact Development within Utah” (Guide), dated December 2018.
- **Source Control Program Development:** This new program will require the following activities to be completed. Perry will deploy this program in July 2023.
 - **Establish an Inventory:** This inventory will identify all post-construction structural storm water control measures installed and implemented for both public and private sector sites. The inventory shall contain (1) a short description of each storm water control measure; (2) a short description of maintenance requirements; and (3) inspection information. (See General Permit 4.2.5.4.1).
 - **Agreements for Private Sector Sites:** For private sector sites, the City shall execute an Agreement with the Property Owner outlining the responsibility for maintenance and establishing the right for the City to conduct inspections annually and require action if found to not be properly maintained. The Agreement shall be recorded with the property and shall run with the land.
 - **Maintenance of Inventory:** The Inventory shall be updated when changes occur in property ownership or changes to control measures implemented at the site.
 - **Establish Inspection and Enforcement Program:** Perry will be implementing an inspection and enforcement program that supports these sites applying operational and/or structural BMPs to prevent illicit discharges or violations of surface water, ground water, or sediment management standards as well as practices to reduce pollution from the application of pesticides, herbicides, and fertilizers. Once established, staff will annually complete the number of inspection equal to 20% of the businesses or sites listed in the inventory and 100% of sites identified through credible complaints.

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- **Training:** Staff continues to increase their knowledge by remaining current with new/revised stormwater regulations, along with attending internal and external training on erosion control, LID techniques, stormwater design models, standards, and practices.
-

Specific Goals with Methods of Evaluation

To ensure Perry is meeting the requirements of the Post Construction Stormwater Management – MCM 5 section of the General Permit, the following specific goals have been established.

- **Source Control Standards / Ordinance Goal:** Annually, Perry will review and update, as needed, the City's Ordinances and Public Works Standards to follow the requirements of the General Permit.

Methods of Evaluation:

- Ordinance
- Public Works Standards

- **Source Control Program Development Goal:** By July 2023, Perry will have an established source control program as outlined in the section above.

Methods of Evaluation:

- Standard Operating Procedures.
- Completed Inventory.
- Inspection Logs.

Record Keeping: Perry will maintain program records including documentation of each site visit, inspection records, denial of entry occurrences, warning letters, notices of violation, and other enforcement records that demonstrate an effort to bring sites into compliance.

7. Pollution Prevention and Good Housekeeping for Municipal Operations – MCM 6

Perry is pursuing a robust Operations and Maintenance program that ensures that runoff and stormwater discharges from City owned and/or operated facilities to the stormwater system are inspected and maintained in a manner that prevents or reduces potential impacts to stormwater drainage and receiving waters.

Perry's Plan to Meet the Requirements of the Permit (General Permit 4.2.6)

Areas of Focus

- **Maintenance Standards:** Perry implements maintenance standards and is working to create written SOPs for defining these standards.
- **Ongoing Program to Inspect and Maintain the MS4:** Perry inspects all municipally owned catch basins and inlets every 2 years. If inspection indicates that cleaning or repair is needed, those activities are completed within the permit allowed timelines, generally within 6 months.
 - Perry inspects all municipally owned and operated water quality treatment and flow control facilities. If inspection indicates that cleaning or repair is needed, those activities are completed within the permit allowed timelines, generally within 1 year.
 - Perry will continue to maintain compliance by achieving at least 95% of required inspections.
- **Practices, Policies, and Procedures to Reduce Stormwater Impacts of Municipal Operations:** The City operations and maintenance program implements standard operating practices, policies, and procedures to reduce stormwater impacts associated with runoff from land owned and maintained by Perry and road maintenance activities.
- **Stormwater Pollution Prevention Plan (SWPPP) for Perry's "High-Priority" Facilities:** Perry is working to create an inventory of and develop a SWPPP for each "high-priority" city-owned facility. The SWPPP includes detailed descriptions of the operational and structural BMPs in use, inspection schedule and results, an inventory of materials and equipment stored on-site, a list of activities conducted that may be exposed to rain, a map of the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure, and a plan for responding to spills.
- **Existing Flood Management Controls:** During the annual inspection, existing flood management control structures will be assessed to determine whether changes, additions, or retrofitting is required to improve water quality. If it is determined that retrofitting is required, the City Engineer will work with Staff to develop a plan for prioritizing and completing the needed retrofit(s).
- **Training:** Perry's Public Works Staff receives training on the importance of protecting water quality during maintenance operations, inspection procedures, relevant water quality and operations and maintenance standards, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns.

Specific Goals with Methods of Evaluation

To ensure Perry is meeting the requirements of the Pollution Prevention and Good Housekeeping for Municipal Operations – MCM 6 section of the General Permit, the following specific goals have been established.

- **Practices, Policies, and Procedures to Reduce Stormwater Impacts of Municipal Operations**
Goal: By July 2022, Perry will update and maintain standard operating procedures as required by the General Permit.

Methods of Evaluation:

- Standard Operating Procedure Manuals.
- Checklists.
- Inventory of floor drains located inside City-owned facilities

Record Keeping: Perry will maintain program records including documentation of each site visit, inspection records, denial of entry occurrences, warning letters, notices of violation, and other enforcement records that demonstrate an effort to bring sites into compliance.

8. 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."

Kevin Jeppsen, Mayor

Date: _____

ATTEST:

Tyler Wagstaff, Public Works Director