

## **SIX MINIMUM CONTROL MEASURES FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s) WITH NPDES PERMITS**

The following outlines the NPDES permit requirements for implementation of the Six Minimum Control Measures as required under Kansas MS4 permits issued by the KDHE. The NPDES permit provided to the MS4 authority should be reviewed for additional requirements associated with implementation of the Six Minimum Control Measures such as deadlines for the implementation of the requirements or supplemental requirements associated with the individual measures. The general requirements are as follows:

**A. Six Minimum Controls** - The permittee shall develop and implement Best Management Practices (BMPs with measurable goals for each of the six minimum control measures. The six minimum control measures and the associated requirements are listed and explained as follows:

### **1. Public Education and Outreach**

The permittee shall implement a public education program which includes distribution of educational materials to the community or conducting equivalent outreach activities which address the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.

### **2. Public Involvement and Participation**

The permittee shall implement a public involvement and participation program to solicit public comment and recommendations regarding the BMPs and measurable goals utilized by the permittee to comply with the permit. The permittee shall comply with state and local public notice requirements when implementing a public involvement and participation program.

### **3. Illicit Discharge Detection and Elimination**

The permittee shall:

- a. Develop, implement and enforce a program to detect and eliminate illicit discharges into the MS4.
- b. Develop a storm sewer system map of the permittee's MS4, showing the location of all outfalls, either pipes or open channel drainage, showing the names and location of all streams or lakes that receive discharges from those outfalls. A copy of the map shall be submitted to KDHE. This map may be submitted as a PDF file(s) on a CD or DVD.
- c. Enact ordinances or resolutions to prohibit non-stormwater discharges into the storm sewer system and implement appropriate enforcement procedures and actions if the permittee has such authority. A copy of the ordinances or resolutions shall be submitted to KDHE.
- d. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, and
- e. Develop and implement a plan to detect and address prohibited non-stormwater discharges, including, but not limited to illegal dumping, to the storm sewer system. Unless identified by either the permittee or KDHE as a significant source of pollutants to waters of the state, the following examples of non-stormwater discharges are not prohibited from entering the MS4.

1. Water line flushing
2. Diverted stream flow
3. Rising groundwaters
4. Uncontaminated groundwater infiltration as defined under 40 CFR 35.2005(20) to separate storm sewers
5. Uncontaminated pumped groundwater
6. Contaminated groundwater if authorized by KDHE and approved by the municipality
7. Discharges from potable water sources
8. Foundation drains
9. Air conditioning condensate
10. Irrigation waters
11. Springs
12. Water from crawl space pumps
13. Footing drains
14. Lawn watering
15. Individual residential car washing
16. Occasional not-for-profit car wash activities
17. Flows from riparian habits and wetlands
18. Dechlorinated swimming pool discharges excluding filter backwash
19. Street wash water (excluding street sweepings which have been removed from the street)
20. Discharges of flows from firefighting activities
21. Heat pump discharge waters (residential only)
22. Treated wastewater meeting requirements of a NPDES permit
23. Sump pump drains
24. Other discharges determined not to be a significant source of pollutants to water of the state, a public health hazard, or a nuisance

#### **4. Construction Site Stormwater Runoff Control**

The permittee shall develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharge from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation, at a minimum, of the following:

- a. Permittees which have the authority to enact ordinances or resolutions shall enact such ordinances or resolutions to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under state and local law.
- b. Requirements for constructions site owners or operators to implement appropriate erosion and sediment control best management practices.
- c. Requirements for construction site owners or operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that are likely to cause adverse impacts to water quality.
- d. Procedures for site plan review which incorporate consideration of potential water quality impacts.
- e. Procedures for receipt and consideration of information submitted by the public.
- f. Procedures for site inspection and enforcement of control measures.

#### **5. Post-Construction Stormwater Management in New Development and Redevelopment Projects**

The permittee shall develop, implement, and enforce a program to address post-construction stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development and implementation, at a minimum of the following:

- a. BMPs to prevent or minimize adverse water quality impacts.
- b. Strategies which include a combination of structural and/or non-structural BMPs appropriate for the municipality.
- c. For permittees which have the authority, ordinances or resolutions to address post-construction runoff from new development and redevelopment projects to the extent allowable under state and local law.
- d. Ensure adequate long-term operation and maintenance of BMPs.

**6. Pollution Prevention/Good Housekeeping for Municipal Operations**

The permittee shall develop and implement an operation and maintenance program that includes employee training to prevent and reduce stormwater pollution from municipal operations activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

**B. Stormwater Management Program**

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has the Stormwater Management Program (SMP) been developed and implemented?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Has the SMP been modified or updated during this reporting period?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has the current SMP been submitted to KDHE via KEIMS?

If the answer to item 3 is a "NO", a copy of the updated SMP must be uploaded to KEIMS. If it is anticipated a measurable goal cannot be met in the next year, the SMP should be modified and submitted to KDHE for review. The modifications may include different BMPs and/or revised goals to avoid being in a position of non-compliance. However, reasonable BMPs with reasonable goals must be implemented or KDHE may require the permittee to modify the SMP to include additional or better BMPs and/or more reasonable goals.

**C. Stormwater Management Program Requirements (Six Minimum Control Measures)**

- 1. Public Education and Outreach

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Has a program been developed and implemented to educate the public about stormwater topics?

**C. Stormwater Management Program Requirements (Six Minimum Control Measures)**

1. Public Education and Outreach (Table)

List all of the public education and outreach BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

BMP ID NUMBER	BRIEF BMP DESCRIPTION	PROGRESS ACHIEVING GOAL(S) (MEASURED RESULT)	POINTS CLAIMED
PE&O - 1	Maintain a stormwater webpage for the permittee.	Stormwater webpage - <a href="https://www.leavenworthks.org/citymanager/page/stormwater-projects">https://www.leavenworthks.org/citymanager/page/stormwater-projects</a>	2
PE&O - 2	Distribute educational materials (either flyers, brochures, catalog mailings, handouts, or e-mails) addressing various pertinent stormwater public education topics.	Flyers and educational materials are available on the City's website and in City Hall.	2
PE&O - 3	Provide either training or educational materials to permittee identified businesses at high risk of contributing to stormwater pollution.	Stormwater Education Brochures - <a href="https://www.leavenworthks.org/publicworks/page/stormwater-report-documents">https://www.leavenworthks.org/publicworks/page/stormwater-report-documents</a>	2
PE&O - 4	Apply notification, placard, covers/hatches with message, or stencil, on stormwater inlets to provide a message similar to "No Dumping - Drains to River".	Not taking any points. Unable to verify that the City has met the 5% threshold	
PE&O - 5	Post the municipality's MS4 permit and SMP document on either the stormwater webpage or the municipal webpage.	SMP - <a href="https://www.leavenworthks.org/publicworks/page/public-works-documents">https://www.leavenworthks.org/publicworks/page/public-works-documents</a> MS4 Permit - <a href="https://www.leavenworthks.org/publicworks/page/stormwater-report-documents">https://www.leavenworthks.org/publicworks/page/stormwater-report-documents</a>	1
PE&O - 12	Create a stormwater information brochure to provide to the public at public meetings and/or hearings.	Stormwater-related brochures can be found at: <a href="https://www.leavenworthks.org/publicworks/page/stormwater-report-documents">https://www.leavenworthks.org/publicworks/page/stormwater-report-documents</a>	1
PE&O - 15	Develop or participate in an ongoing social media program to share pertinent stormwater public education topics.	There were 10 social media posts related to public education about improving, reducing or listing the dangers of polluting the City's stormwater system.	2
<b>TOTAL POINTS CLAIMED FOR PUBLIC EDUCATION AND OUTREACH</b> —————▶			<b>12</b>

**C. Stormwater Management Program Requirements (Six Minimum Control Measures)**

1. Public Involvement and Participation

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a public involvement and participation program been developed and implemented to solicit public comments and recommendations regarding BMPs and measurable goals utilized to comply with the permit?

**C. Stormwater Management Program Requirements (Six Minimum Control Measures)**

2. Public Involvement and Participation (Table)

List all public involvement and participation BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points

BMP ID NUMBER	BRIEF BMP DESCRIPTION	PROGRESS ACHIEVING GOAL(S) (MEASURED RESULT)	POINTS CLAIMED
P I/P - 1	Hold a public hearing or public forum to notify the public about stormwater program activities and to solicit public comments regarding stormwater issues.	<p>City Commission reviewed the 2023 KDHE Annual Stormwater Reports on February 13 and 27, 2024. The City Commission reviewed the 2024 KDHE Annual Stormwater Reports on February 11 and 25, 2024. The meetings were also broadcast on the City's channel Cable TV station and YouTube.</p> <p>City Commission reviewed stormwater projects for CIP in 2024, and approved design and construction of several projects which can be found at:  <a href="https://www.leavenworthks.org/citymanager/page/stormwater-projects">https://www.leavenworthks.org/citymanager/page/stormwater-projects</a></p> <p>Stormwater-related documents are at:  <a href="https://www.leavenworthks.org/publicworks/page/stormwater-report-documents">https://www.leavenworthks.org/publicworks/page/stormwater-report-documents</a></p>	2
P I/P - 3	Hold a park or stream bank clean-up event for public volunteers to aid municipal staff in removing trash, debris, or pollutant sources from the selected clean-up area.	City-wide Spring Clean-up - April 20, 2024. Services offered to residents include open Brush Site, Recycling Center, large-item drop off and electronics recycling. City coordinated with Leavenworth County and a special event to dispose of HHW was held at the City Municipal Center in April 2024 where a total of 3,252 pounds of HHW was collected.	3
P I/P - 5	Provide at least two events for residents to engage in clean-up activities and improve water quality in the municipality.	The City has a "Three-Mile Creek" monthly clean-up program (March through November) in which citizens pick up trash. In 2024, there were 7 citizen groups that participated.	3
<b>TOTAL POINTS CLAIMED FOR PUBLIC EDUCATION AND OUTREACH</b> →			<b>8</b>

**C. SMP Requirements (Six Minimum Control Measures)**

**3. Illicit Discharge Detection and Elimination**

Please place an "X" in the left boxes to complete the table below.

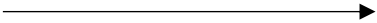
YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a program/plan been developed and is it presently implemented to detect and address illicit/prohibited discharges into the MS4, including dry weather monitoring?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a map of the MS4 been developed, showing the location of all outfalls, either pipes or open channel drainage, showing names and location of all streams or lakes receiving discharges from the outfalls? If yes, attach map.  Map can be found at: <i>(2024 report webpage)</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have ordinances, or resolutions, or regulations to prohibit non-stormwater discharges into the storm sewer system been enacted?  If yes, list ordinances/resolutions and their effective dates below: <ul style="list-style-type: none"> <li>• Ordinance No. 8201 was adopted on December 16, 2022, and enforcement began in 2023.</li> <li>• Ordinance No. 8201 - Amending Division 5, Chapter 46, Regulating and Permitting the Operation of Facilities Producing Grease-Laden Waste and Service Providers for Grease Interception Devices</li> </ul>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Have the ordinances, resolutions, or regulations been modified?  If yes, list ordinances/resolutions and their effective dates below:

List all the Illicit Discharge Detection and Elimination BMPs as identified in the SMP and provide the requested information in the following table.

**C. Stormwater Management Program Requirements (Six Minimum Control Measures)**

3. Illicit Discharge Detection and Elimination (Table)

List all illicit discharge detection and elimination BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

BMP ID NUMBER	BRIEF BMP DESCRIPTION	PROGRESS ACHIEVING GOAL(S) (MEASURED RESULT)	POINTS CLAIMED
IDD&E - 6	Inspect, by televising pipelines or direct visualization of open channel drainage, 2% of the MS4 system within the permit area all conducted within a 12-month period to aid in identifying illicit discharges as well as evaluate the condition of the storm sewer lines/drainage channels-ditches.	The City visually inspected open channels and televised storm lines across the City. Televising lines was done by Water Pollution Control staff while open channels/ditch lines were inspected by our dedicated stormwater staff at our Municipal Service Center.	3
IDD&E - 7	Implement a Household Hazardous Waste Collection Program (HHWCP) or document others have implemented such a program to provide such service to all property owners or residents located within the permit area.	Leavenworth County provides HHW services throughout the year, and a special event to dispose of HHW was held at the Municipal Service Center in April 2024 where a total of 3,252 pounds of HHW was collected.	3
IDD&E - 9	Provide a contribution to area recycle programs or programs (such as household hazardous waste disposal facilities, e-cycle facilities, paper shred facilities, pharmaceutical disposal facilities, etc.) designed to properly dispose of types of waste or materials which have previously been discarded to or adjacent to either the MS4, streams, or lake within or adjacent to the permittee's permit area.	The City has a Recycling Center (free to the City of Leavenworth residents) that accepts the following items: tin and aluminum cans, car batteries and rechargeable batteries, e-waste, used automotive oil, plastics, to name a few. A complete list can be found at: <a href="https://www.leavenworthks.org/publicworks/page/leavenworth-recycling-center">https://www.leavenworthks.org/publicworks/page/leavenworth-recycling-center</a>	2
IDD&E - 10	Inspect 5% of the MS4 system stormwater inlets and/or outfalls within the permit area all conducted within a 12-month period to aid in identifying illicit discharges.	Stormwater crew inspected and/or maintained approximately 5,330 inlets and area drains, and other stormwater facilities.  Number of inlets cleaned - 998	3
<b>TOTAL POINTS CLAIMED FOR PUBLIC EDUCATION AND OUTREACH</b> 			<b>11</b>



**C. SMP Requirements (Six Minimum Control Measures)**

**4. Construction Site Stormwater Runoff Control**

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development/redevelopment projects been enacted?
			If yes, list ordinances/resolutions and their effective dates below: Review Stormwater Management Land Disturbance Permits - December 6, 2016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure or program been developed requiring construction site owners and/or operators to implement appropriate erosion and sediment control best management practices?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure or program been developed requiring construction site owners and/or operators to control waste such as discarded building materials, concrete truck washout, chemicals, paint, litter, and sanitary waste at construction sites likely to cause adverse impacts to water quality?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed and implemented requiring site plan review which includes consideration of potential water quality impacts?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed for the receipt and consideration of information submitted by the public?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed and implemented for construction site inspection and enforcement of the control measures?


List all the construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the following table.



**C. Stormwater Management Program Requirements (Six Minimum Control Measures)**

4. Construction Site Stormwater Runoff Control (Table)

List all construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

BMP ID NUMBER	BRIEF BMP DESCRIPTION	PROGRESS ACHIEVING GOAL(S) (MEASURED RESULT)	POINTS CLAIMED
CSSRC - 1	Implement a requirement for a Soil Erosion and Sediment Control (SESC) Plan for any land disturbance sites which are either equal to or greater than one acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.	The City requires a land disturbance permit (LDP) for any land disturbance. This includes submittal of a plan identifying all needed erosion control measures. Examples of residential and commercial LDPs can be found at: <a href="https://www.leavenworthks.org/publicworks/page/draft-2024-kdhe-annual-stormwater-report-0">https://www.leavenworthks.org/publicworks/page/draft-2024-kdhe-annual-stormwater-report-0</a>	2
CSSRC - 2	Develop and adopt a design manual for erosion and sediment control BMPs which are required to be used on sites disturbing sites equal to or greater than one acre or for construction activity disturbing less than one acre which is part of a large common plan of development or sale that in total disturbs one acre or more.	The City follows MARC erosion control BMPs and APWA 5600. Examples can be found at: <a href="https://www.leavenworthks.org/publicworks/page/stormwater-report-documents">https://www.leavenworthks.org/publicworks/page/stormwater-report-documents</a>	2
CSSRC - 4	Develop a site plan review process which considers potential water quality impacts which may occur during construction as well as post construction impacts	The City reviews every site plan for both water quantity and water quality. Building permits are not issued until the water quality is addressed.	2
CSSRC - 7	Acquire or develop a software tracking system to track inspections and related tasks.	The City uses MUNIS to track and schedule inspections.	1
<b>TOTAL POINTS CLAIMED FOR PUBLIC EDUCATION AND OUTREACH</b> 			<b>7</b>

**C. SMP Requirements (Six Minimum Control Measures)**

**5. Post-Construction Site Stormwater Management in New Development and Redevelopment**

Please place an "X" in the left boxes to complete the table below.

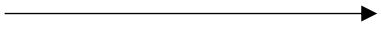
YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development and redevelopment projects been enacted?
			If yes, list ordinances/resolutions and their effective dates below: In December, 2016, City staff implemented the requirement to obtain a Land Disturbance Permit (LDP) for any construction activity within the City. Ordinance No. 8021 can be found at: <a href="https://www.leavenworthks.org/publicworks/page/land-disturbance-and-excavation">https://www.leavenworthks.org/publicworks/page/land-disturbance-and-excavation</a>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a post-construction stormwater runoff program been implemented?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have post-construction sites been inspected this past year?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are BMPs specified to minimize adverse water quality impacts?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have strategies been developed to include a combination of structural and/or non-structural BMP appropriate for the municipality?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have measures been implemented to ensure adequate long-term operation and maintenance of structural BMPs?

List all the post-construction site stormwater management in new development and redevelopment BMPs as identified in the SMP and provide the requested information in the following table.

### C. Stormwater Management Program Requirements (Six Minimum Control Measures)

#### 5. Post-Construction Stormwater Management (Table)

List all post-construction stormwater management BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

BMP ID NUMBER	BRIEF BMP DESCRIPTION	PROGRESS ACHIEVING GOAL(S) (MEASURED RESULT)	POINTS CLAIMED
PCSM - 1	Develop and adopt a custom design manual for Post-Construction Stormwater Management which specifies various structural BMPs which are required for new development and re-development construction sites which are greater than one acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.	<p>Link to APWA/MARC manuals posted at City's website:  <a href="https://www.leavenworthks.org/publicworks/page/additional-stormwater-documents">https://www.leavenworthks.org/publicworks/page/additional-stormwater-documents</a></p> <p>Link to the City of Leavenworth Manual of Infrastructure Standards:  <a href="https://www.leavenworthks.org/publicworks/page/designs-studies-reports">https://www.leavenworthks.org/publicworks/page/designs-studies-reports</a></p>	3
PCSM - 2	Develop a list of post-construction structural or non-structural BMPs which are required to be incorporated in any development/re-development project. The list must include guidance regarding the BMPs which must be incorporated in various projects as determined appropriate by the permittee. The list is to be provided to entities involved with the design of projects prior to site plan review by the permittee.	The City requires that water quality impacts be addressed for development activities. Water quality BMPs may consist of rain gardens, bio-swales, basins that detain runoff until silt/pollutant settle out or other approved BMPs. In areas where there is sufficient space for larger BMPs, hydrodynamic separators are being utilized.	2
PCSM - 3	Develop and implement a program to ensure adequate long-term cleaning, operation and maintenance of all municipally owned or operated post-construction structural stormwater BMP facilities.	The City has a software maintenance program that identifies and schedules inspections.	2
PCSM - 5	Develop and implement a program for inspection of permittee-owned structural BMPs which includes implementation of needed maintenance to ensure long-term operation of the BMPs.	The City inspected City-owned structural BMPs at random times and after significant storm events. These BMPs mostly consist of hydrodynamic separators (Thornton and Eisenhower) and "beehive" grates. No points taken.	2
PCSM - 6	Develop and implement a program for inspection of privately-owned structural BMPs which includes providing the owner of the BMPs an inspection report which specifies needed maintenance to ensure long-term operation of the BMPs.	Due to personnel changes, a Detention Public Meeting was not held. Staff did inspect the majority of the privately-owned basins in 2024 and we are creating a rotation inspection schedule for all of these basins. No points taken.	2
<b>TOTAL POINTS CLAIMED FOR PUBLIC EDUCATION AND OUTREACH</b> 			<b>11</b>

**C. SMP Requirements (Six Minimum Control Measures)**

6. Municipal Pollution Prevention/Housekeeping

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The permit requires the permittee to enact a program to address pollution prevention/good housekeeping for Municipal Operations. Has such a program been enacted?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is there a program to ensure proper use and storage of pesticides, herbicides, and fertilizers at permittee owned facilities? The City follows SDS (Safety Data Sheet).

List all the municipal pollution prevention/good housekeeping BMPs as identified in the SMP and provide the requested information in the following table.

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**D. Total Maximum Daily Load (TMDL) Best Management Practices (BMPs)**

Some permittees are required to implement BMPs to reduce the discharge of listed TMDL regulated pollutants (potentially any or all of the following pollutants - bacteria, nutrients, and sediment)

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Were any BMPs intended to reduce the discharge of TMDL regulated pollutants implemented? See your permit to determine if TMDL regulated pollutants are listed for the receiving stream affected by your stormwater system (TMDL Table).

List all the TMDL BMPs as identified in the SMP and provide the requested information in the following table.

**CITY NOT REQUIRED TO REPORT**

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**D. TMDL BMP Table**

The BMPs listed in the below table should add up to a minimum of **6** points.

BMP ID	BRIEF BMP DESCRIPTION	PROGRESS ACHIEVING GOAL(S) (MEASURED RESULT)	POINTS CLAIMED
	<b>City Not Required to Report</b>		
<b>TOTAL POINTS CLAIMED FOR TMDL</b>			