

Annual Review of SWPPP Implementation

June 10, 2024



SWPPP

Storm Water Pollution Prevention Program



Source and History

Federal Clean Water Act NPDES = National Pollutant Discharge Elimination System 2002 NPDES Phase II permit begins February 2003: District notified by EPA via MPCA because the public ditch system conveys stormwater, 1. CCWD is designated a special MS4 (Municipal Separate Storm Sewer System)

2. must develop and implement a Storm Water Pollution Prevention Program (SWPPP)



Purpose

- 1. Reduce storm water discharges to the 'maximum extent practicable'
- 2. Protect water quality
- 3. Satisfy the water quality requirements of the Clean Water Act.



Requirement

Develop 6 Minimum Control Measures (MCMs)



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 Runoff Control
- 5. Post-construction Storm Water Management
- 6. Pollution Prevention/Good Housekeeping for Municipal Operations



MCM 1 Public Education and Outreach

<u>Requirement</u>: Implement public education or equivalent outreach activities on impacts of stormwater discharge & steps to reduce pollutants

Method	2022	2023
Brochures and related materials *No Nite-2-Unite materials in 2022	928	3,910
Newsletter approx #households via City partners -34 articles published	60,000	62,000
Direct Contacts at Stormwater-related Community Events	1428	1803
School Projects & Presentations	62	65
Website Hits	325,000	245,000
E-newsletter recipients	72	246
Swag (pens, rain gauges, stickers, poop bags)	792	878



MCM 2 Public Involvement- Participation

<u>Requirement</u>: Comply with public notice requirements when implementing public involvement/participation program.

	2022	2023
Annual Meeting Format	in Person	in person
Attendees	0	0



MCM 3 Illicit Discharge Detection & Elimination (IDDE)

<u>Requirement</u>: Develop, implement and enforce a program to detect and eliminate illicit discharges.

	2022	2022
Number of Illicit Discharges	15	16
Discovered through	1 by Public complaint	6 by Public complaint
	14 by Staff observation	10 by Staff observation
Enforcement	Verbal warning Notice of Violation	Verbal warning Notice of Violation
Provide IDDE Training to Staff	Yes	Yes
Other requirement fulfilled Mapping, enforcement manual, BMP Inventory	Yes	Yes



MCM 4 Construction Site Runoff Control

<u>Requirement</u>: Develop, implement and enforce a program to reduce pollutants in any storm water runoff from construction activities that result in land disturbance greater than or equal to 1 acre.

	2021	2022	2023
Plan reviews conducted	155	205	159
Enforcement actions taken	10	15	9
Active Construction Sites	182	113	139
Number of inspections	443	499	462



MCM 5 Post-construction Stormwater Management

<u>Requirement</u>: Have program to address runoff from > 1 acre development and control WQ impacts

	2022	2023
Do District regulatory mechanisms & Standards meet approved standards	Yes	Yes
Does District use approved BMPs (Retention, detention, infiltration, MIDs)	Yes	Yes



MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations

Requirement: Develop O&M program

	2022	2023
Structural BMPs, outfalls, ponds, within MS4	2,295	22,303
BMPs, outfalls, ponds Inspected	76	59
Own storage and material handling areas	Yes	Yes
Inspections	Yes	Yes



TMDL Compliance

<u>Requirement</u>: Report progress on TMDL implementation

2016: Total Daily Maximum Load (TMDL) study for Aquatic Life and Recreation completed and approved by EPA establishing required Wasteload Allocations (WLAs) for Total Suspended Solids (TSS), Total Phosphorus (TP), and *E. coli*

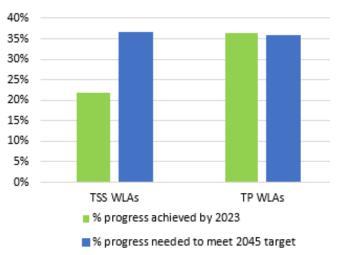


TMDL Compliance

<u>Requirement</u>: Report progress on TMDL implementation

	2021	2022	2023
TSS WLAs cumulative reductions achieved (tons/yr)	51.3	57	57
TP WLAs cumulative reductions achieved (lbs/yr)	1534	1564	1606
Does the District have a bacteria source inventory and reduction plan?	Yes		







RECOMMENDATION

Receive comments from the public.

