Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

for the NPDES/SDS General Small Municipal Separate Storm Sewer System (MS4) Permit MNR040000 reissued with an effective date of August 1, 2013

Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at http://www.pca.state.mn.us/ms4.

Submittal: This *MS4 SWPPP Application for Reauthorization* form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: U of M Duluth MS4 (Regents of the University of Minnesota c/o UMD Vice Chancellor - UMD Finance and Operations) *County: St. Louis
(city, county, municipality, government agency or other entity)

*Mailing address: 1049 University Drive, 297 DAdB

*City: Duluth *State: MN *Zip code: 55812

*Phone (including area code): 218-726-7101 *E-mail: vcfo@d.umn.edu

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: King *First name: John
(department head, MS4 coordinator, consultant, etc.)

*Title: Director - UMD Facilities Management

*Mailing address: 1049 University Drive, 241 DAdB

*City: Duluth *State: MN *Zip code: 55812

*Phone (including area code): 218-726-8821 *E-mail: jking@d.umn.edu

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Larson First name: Erik
(department head, MS4 coordinator, consultant, etc.)

Title: Sr. Engineer - UMD Facilities Management

Mailing address: 1049 University Drive, 241 DAdB

City: Duluth State: MN Zip code: 55812

Phone (including area code): 218-726-6915 E-mail: elarson@d.umn.edu

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this *MS4 SWPPP Application for Reauthorization* form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

☒ Yes - *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.*

I certify that 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 civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Mike Seymour
(This document has been electronically signed)

Title: Vice Chancellor - UMD Finance and Operations Date (mm/dd/yyyy): 12/19/13

Mailing address: 1049 University Drive, 297 DAdB

City: Duluth State: MN Zip code: 55812

Phone (including area code): 218-726-7101 E-mail: mseymour@d.umn.edu

Note: *The application will not be processed without certification.*

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☐ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Regional Storm Water Protection Team	MCM1, MCM2
University of Minnesota, Twin Cities – UMTC oversees the University wide construction, regulatory, and enforcement responsibilities	Regulatory Mechanisms and Enforcement Response Procedures and MCM BMPs associated with these mechanisms and procedures

B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships.*

See attached discription of partnership with RSPT

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☒ Yes ☐ No

1. If **yes:**

   a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

   ☐ Ordinance ☐ Contract language
   ☒ Policy/Standards ☐ Permits
   ☐ Rules
   ☐ Other, explain: _____

   b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

   Citation:

   Direct link:

   http://policy.umn.edu/Policies/Operations/Safety/ENVIRONMENT_PROC04.html

   ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg.*

2. If **no:**

   Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Construction site stormwater runoff control

A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes:**

a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☐ Ordinance ☐ Contract language
☒ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Direct link:

http://policy.umn.edu/Policies/Operations/Safety/ENVIRONMENT_PROC04.html

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg.*

B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

We will amend our Stormwater Procedure to include all the erosion and sediment controls and waste controls as listed below in section C.

C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

1.	Best Management Practices (BMPs) to minimize erosion.	☒ Yes ☐ No
2.	BMPs to minimize the discharge of sediment and other pollutants.	☒ Yes ☐ No
3.	BMPs for dewatering activities.	☐ Yes ☒ No
4.	Site inspections and records of rainfall events	☒ Yes ☐ No
5.	BMP maintenance	☒ Yes ☐ No
6.	Management of solid and hazardous wastes on each project site.	☐ Yes ☒ No
7.	Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means.	☒ Yes ☐ No
8.	Criteria for the use of temporary sediment basins.	☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C 3,6 We currently have guidance for dewatering activites and management of solid and hazardous waste on project sites, but however, it is not part of our official guidance. We will amend our Stormwater Procedure to formalize our current action.

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities? ☒ Yes ☐ No

1. If **yes:**

a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☐ Ordinance ☐ Contract language
☒ Policy/Standards ☐ Permits

☐ Rules
☐ Other, explain: _____

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Direct link:

http://policy.umn.edu/Policies/Operations/Safety/ENVIRONMENT_PROC04.html

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg.*

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

   a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☒ Yes ☐ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of Total Suspended Solids (TSS).
      3) Stormwater discharges of Total Phosphorus (TP).

   b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☒ Yes ☐ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of TSS.
      3) Stormwater discharges of TP.

3. **Stormwater management limitations and exceptions:**

   a. Limitations

      1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No

         a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
         b) Where vehicle fueling and maintenance occur.
         c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
         d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.

      2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No

         a) With predominately Hydrologic Soil Group D (clay) soils.
         b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
         c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
         d) Where soil infiltration rates are more than 8.3 inches per hour.

      3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory ☐ Yes ☒ No

mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process.

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
   a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
      1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
      2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
      3) Locations in the next adjacent DNR catchment area up-stream
      4) Locations anywhere within the permittee's jurisdiction.
   b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No
   c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No
   d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No
   e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No
   f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
   a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No
   b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No
   c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

B 3 and 4 The University is in the process of revising our Stormwater Procedure. We will add sections on Stormwater Management Limitations and Exceptions, and Mitigation Provisions to the revision.

B 5 The University owns and operates all structural stormwater BMPs within the MS4.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs.*
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

   The University currently does not have a written enforcement response procedure. We will develop a written enforcement procedure that will reflect our enforcement policy listed in our Stormwater Procedure as follow:

   "Failure to comply with the SWPPP and this procedure will be reported to the Contractor through the Project Manager and may result in formal project review and appropriate corrective actions. up to and including work stoppages. Work stoppage orders will be implemented in cases of imminent environmental damage by written directive of the Directior of DEHS, with notice to the affected Vice President; in all other cases, only after completion of the established dispute resolutions process for capital projects.".

B. Describe your ERPs:

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

Our storm water systems for each UMD site under our MS4 permit (those sites owned and operated within the urbanized area) are mapped in AutoCAD and the maps are updated based off as-built drawings and field visits in accordance with the Part III.C.1 of the permit.

In 2013 we televised our storm sewer lines and inspected and cataloged our storm sewer structures to the MEP. From this we are currently developing a spreadsheet to assist us in determining potential repairs and need future for additional inspections.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☒ Yes ☐ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☐ Yes ☒ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☒ Yes ☐ No
4. All receiving waters. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

B 2 We only have geographic cordinates for a portion of our outfalls - Inspect those outfalls that do not have associated geographic cordinates as part of the next inspection (as required by Part III.D.6e.2) within 12 months of the date of permit coverage.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☒ Yes ☐ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☒ Yes ☐ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☒ Yes ☐ No
2. A geographic coordinate. ☒ Yes ☐ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☒ Yes ☐ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: http://www.pca.state.mn.us/ms4 , according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☒ Yes ☐ No

If you answered **no,** the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

   Our educational program includes being a part of the "Regional Storm Water Protection Team" (RSPT) which provides a variety of educational and outreach opportunities in the Duluth area including but not limited to brochures, PSA and booths at local gatherings. On campus we provide tours of our storm water features and classroom presentations when requested as well as other forms of education. SeaGrant and NRRI also provide stormwater education to a larger audience.

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Distribute Educational Materials (1a-1)	Minimum of 1000 stormwater information contacts annually, minimum 1 stormwater event annually (annual public "meeting") Have formal SWPPP and other storm water pollution prevention information available on website
Education Program (1b-1 (1c-1 – 1c-6))	1000 SW informational contacts Student SW "internship" – One / yr. Participate in RSPT meetings and activities, - As possible Provide educational and logistical support for student SW initiatives - As needed Integrate stormwater education into ongoing campus activities - As available Identify key student education goal - Annual
Annual Public "Meeting" (1e-1)	Provide a minimum of 1 opportunity for public to review and comment on the SWPPP (meeting / event table / or other free public event) annually

BMP categories to be implemented	**Measurable goals and timeframes**
Addition to Education Program (1b-1 (1c-1 – 1c-6))	Track and retain required employee training information as required in the permit, within 12 months of permit coverage Review BMP 1c-6 (Education for Good Housekeeping for Municipal Operations) to include training elements required by

	the permit within 12 months of permit coverage. Review BMP 1c-3 (Education for IDDE) to include training elements required by the permit within 12 months of permit coverage.

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Sustainability Coodinator - Office of Sustainability

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

   We offer at least one opportunity per year (lately it has been in the form of a hallway table during our Sustainability Fair) for the public to ask questions and comment on our SWPPP. We have a storm water steering committee made up of interested faculty, staff and students who reviews our progress on the SWPPP and provides valuable insight in modifying and developing BMPs. We have a "Hot Line" one our storm water web page (http://www.d.umn.edu/fm/stormwater/index.html) for people to comment on our SWPPP or report any concerns regarding storm water.

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Comply with Public Notice Requirements (2a-1)	The public will be notified of the annual public SWPPP "meeting" a minimum of 30 days in advance Notice may be through current UMD notification methods such as UMD Statesman, hallway posters, staff and student listserves, and/or equivalent written or electronic methods
Solicit Public Input and Opinion on Adequacy of the SWPPP (2b-1/2c-1)	Opportunity to comment on the SWPPP shall be available at the annual public "meeting" and on the Stormwater website The Steering Committee will seek knowledgeable representation from the campus community The Steering Committee will consider comments to SWPPP and make changes when appropriate

BMP categories to be implemented	**Measurable goals and timeframes**
Addition to Solicit Public Input and Opinion on Adequacy of the SWPPP (2b-1/2c-1)	Create SOP for documenting relevant public input received – within 12 months of permit coverage

3. Do you have a process for receiving and documenting citizen input? ☐ Yes ☒ No

   If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

BMP 2b-1 will be modified to include a process for documenting relevant public input received within 12 months of the date permit coverage is extended.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Sustainability Coodinator - UMD Office of Sustainability

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

   UMD has relatively detailed storm sewer maps for its properties. As part of our annual inspections we look for possible illicit discharges. We have an on-going project (we are currently about 80% complete) to review each of our buildings for possible I&I and storm/sanitary cross-connects. We have a "Hot Line" on our storm water web page (http://www.d.umn.edu/fm/stormwater/index.html) to report any concerns regarding storm water. We have procedures for portable toilets, swimming pool maintenance, and CB marking to help prevent illicit discharges. The Department of Environmental Health and Safety department responds to leaks and spills on campus.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

   a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.)Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). ☒ Yes ☐ No

   b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No

   c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. ☐ Yes ☒ No

   d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☐ Yes ☒ No

   e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☒ Yes ☐ No

   f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☒ Yes ☐ No

   g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☒ Yes ☐ No

   h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☐ Yes ☒ No

   If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

   C 2.c. We have trained our maintenance staff in illicit discharge, but not ALL field staff. We will develop a training program for all field staff in accordance with the permit within 12 months of permit coverage.

   C 2.d. Beyond tracking MPCA reportable spill areas, we have not identified priority areas for illicit discharge inspection. We will develop a BMP that addresses priority areas within the 12 months of permit coverage.

   C 2.h. Our ERP's will be developed within 12 months of permit coverage.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Storm Sewer System Map (3a-1)	Update map for new construction - Annual

Regulatory Control Program (3b-1)	Update for new permit requirements – As necessary
IDDE Plan (3c-1)	Update maps for reportable spills – As necessary Investigate unknown lines – As necessary / feasible Correction of illicit discharges found – Within 2 years of discovery
Public and Employee ID Information Program (3d-1)	IDDE training / information at annual "meeting" - Annual
Identification of Non SW Discharges (3e-1)	Review illicit discharges per IDDE plan – As necessary

BMP categories to be implemented	**Measurable goals and timeframes**
Addition to Public and Employee ID Information Program (3d-1/1c-3)	Train all field staff – per permit requirements
Addition to IDDE Plan (3c-1)	Review process for responding to spills and formalize SOP – within 12 months of permit coverage Identify priority areas for ID inspection – within 12 months of permit coverage Create SOP for documenting ID response – within 12 months of permit coverage

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☐ Yes ☒ No

   If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

   Create SOP for documenting ID response – within 12 months of permit coverage

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Environmental Compliance Specialist or Sr. Environmental Health and Safety Tech - Department of Environmental Health and Safety

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

   Our Stormwater Procedure requires construction sites of 1 acre or larger to have temporary erosion and sediment controls. We require the Contractor to inspect for effectiveness of these controls and correct any problems. The Contractor must also document all inspections and corrections. We also require that the construction site Erosion Control Supervisor has valid certification in erosion/sediment control. University staff reviews Contractor's compliance during and after construction.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
   a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☒ Yes ☐ No
   b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☒ Yes ☐ No
   c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☐ Yes ☒ No
   d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
      1) Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No
      2) Does your program identify a frequency at which you will conduct construction site inspections? ☒ Yes ☐ No
      3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☒ Yes ☐ No
      4) Does your program include a checklist or other written means to document construction site ☒ Yes ☐ No

inspections when determining compliance?

e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☒ Yes ☐ No

f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☒ Yes ☐ No

g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

D 2 c. The University will develop written procedures for receipt and consideration of reports of noncompliance and other stormwater related information on construction activity submitted by the public.

D 2 d.1) The University currently conducts inspection on all construction sites of 1 acre or larger. Because of the limited number of construction permits we have, it is unnecessary to set priority sites for inspections.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Construction Site Implementation of E/S Control (4b-1)	The University's Construction Standards include the requirement of erosion and sediment control at construction site The University's Project Managers from the Capital Planning Project Management (CPPM) department have been trained on erosion and sediment controls
Procedure for Site Plan Review (4d-1)	Erosion and Sediment Control requirement is part of the University's Stormwater Procedure Construction SWPPPs are reviewed for compliance with the University SW procedure

BMP categories to be implemented	**Measurable goals and timeframes**
Amend Construction Site Implementation of E/S Control (4b-1)	Provide E/S training to newly hired project managers
Amend Waste Controls for Construction Site Operators (4c-1)	Formalize current guidance into Stormwater Procedure within 12 months of permit coverage.
Revisit Establishment of Procedures for the Receipt and Consideration of Stormwater Noncompliance (4e-1)	Formalize current non written processes for receipt and consideration of noncompliance

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Environmental Compliance Specialist - Department of Environmental Health and Safety

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

   Our Stormwater Procedure include standards for post-construction stormwater management and requirement for maintenance and operation the stormwater BMPs.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☐ Yes ☒ No

3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of

post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):

a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☒ Yes ☐ No

b. All supporting documentation associated with mitigation projects that you authorize? ☐ Yes ☒ No

c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☐ Yes ☒ No

d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

E 2 We have a draft checklist for SWPPP Review, we will finalize a written checklist for site plan reviews within 12 months of the date permit coverage is extended.

E 3.b,c,d We will revise our Stormwater Procedure to include specifications for allowing mitigation projects. We will also develop a written procedure to document any applicable requirements and agreements associated to the mitigation projects within 12 months of the date permit coverage is extended.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Post Construction Runoff from New Development and Redevelopment (5b-1)	To ensure that post-construction stormwater management meets standards established in the Stormwater Procedure
Long-term Operation and Maintenance of BMPs (5c-1)	Inspect and maintain as required by MCM 6 and the permit

BMP categories to be implemented	**Measurable goals and timeframes**
Addition to Post Construction Runoff from New Development and Redevelopment (5b-1)	Within 12 months of permit coverage, revise Stormwater Procedure to meet new permit requirements including mitigation procedures
Procedure for Site Plan Review (5d-1)	Within 12 months of permit coverage, develop a checklist for new construction project, that includes stormwater-related requirements (parallel with MCM 4d-1 Procedure for Site Plan Review)

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Environmental Compliance Specialist - Department of Environmental Health and Safety

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

   Our current program is a mix of BMP's relating to how certain maintainance activities should be preformed or what to watch for in order to minimize stormwater polution. It also involves inspections as required by the permit.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☐ Yes ☒ No

3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

   We have a basic inventory from many years ago, but it does not meet the current requirements. We will develop a facilities inventory as required in the permit within 12 months of permit coverage.

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Street Sweeping (6a-2)	Continue to sweep streets and parking lots a minimum of once per year.
Salt/Sand Handling and Storage (6a-5)	Review with maintenance staff proper use and handling of road salt - Annually
Snow Storage (6a-7)	Review with maintenance staff where to pile snow and why they should not pile it in certain areas – Annually
Dumpster / Litter Management (6a-9)	Inspect dumpsters – Annually
Swimming Pool Maintenance (6a-12)	BMP Information attached to repetitive work orders – On going
Pond Maintenance / Cleaning (6a-14)	Remove litter, check for erosion, invasive species – Annual
Integrated Pest Management (6a-15)	Use IPM plan in plant/pest management decisions – On going
Annual Inspection of All Structural Pollution Control Devices (6b-2)	Continue to inspect 100% of, or some at a less frequent interval as allowed by the permit, all SPCD's each year of the MS4 permit cycle (July 31, 2018)
Inspect MS4 Outfalls and Ponds (6b-3)	Continue to inspect a minimum of 20% of all MS4 outfalls each year, until 100% of all MS4 Outfalls and Ponds have been inspected within the MS4 permit cycle (July 31, 2018)
Inspection Follow-up (6b-5)	Follow up on deficiencies found during inspections - Annually
Inspection and Repair Record Keeping (6b-6)	Maintain record of inspections and required repairs – Review within 12 months of permit coverage and on going

BMP categories to be implemented	**Measurable goals and timeframes**
Addition to Pond Maintenance / Cleaning (6-14)	Develop a procedure and schedule for pond assessment as required by the permit within 12 months of permit coverage.
Revise Inspections of Stockpiles, Storage and Material Handling Areas (6b-4)	Revise BMP to conduct quarterly inspections of all stockpile, storage and material handling areas through the end of the MS4 permit cycle (July 31, 2018).
Addition to Municipal Operations and Maintenance Program (6a-1)	Review all BMPs within the program for function and applicability. Remove or modify BMPs no longer functional or applicable - once during the permit cycle (July 31, 2018)
Facilities Inventory (6a-16)	Develop a facilities inventory as required in the permit within 12 months of permit coverage.

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☐ Yes ☒ No

   a. If **no**, continue to 6.

   b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm. Is a map including the following items available for your MS4:

1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☐ Yes ☐ No

2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☐ No

c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☐ No

6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No

7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☐ Yes ☒ No

8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:

a. Addresses the importance of protecting water quality? ☒ Yes ☐ No

b. Covers the requirements of the permit relevant to the duties of the employee? ☐ Yes ☒ No

c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☐ Yes ☒ No

9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

F 6 We will develop a procedure and schedule for pond assessment as required by the permit within 12 months of permit coverage

F 7. We will modify our existing BMP 6b-4 for quarterly inspections of stockpiles, storage and materials handling areas as required in the permit within 12 months of permit coverage

F 8. We have done training for all the items listed, but not as a formal program. We will review BMP 1c-6 to include training elements required by the permit within 12 months of permit coverage.

F 9. We have documentation of all required inspections, most maintenance,and some training. We will review BMP 6b-6 and 1c-6 to include record documentation as required by the permit within 12 months of permit coverage.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Sr. Engineer or Landscape Maintenance Supervisor - UMD Facilities Management

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☐ Yes ☒ No

1. If **no**, continue to section VII.

2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention**:** *MS4NameHere_TMDL.*

This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No

1. If **no**, this section requires no further information.

2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus

Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VIII. Add any Additional Comments to Describe Your Program

MEMORANDUM OF UNDERSTANDING
to establish a
REGIONAL STORMWATER PROTECTION TEAM

A. INTRODUCTION

This Memorandum of Understanding (MOU) formalizes coordination of the Regional Stormwater Protection Team (RSPT), an information networking task force of agencies and jurisdictions including, but not limited to the signatory entities listed on page three.

The RSPT mission is to protect and enhance the region's shared water resources through stormwater pollution prevention by providing coordinated educational programs and technical assistance. Team members are committed to preventing and resolving issues of mutual concern for environmental protection on a regional watershed scale. This commitment is reinforced by policies internal to each agency. To sustain long-term commitment, the signatories agree to establish and implement the Interagency Stormwater Pollution Prevention Initiative described herein.

The goals of this initiative are to foster stormwater pollution prevention as the preferred environmental protection strategy within local and state agencies and to support and promote similar efforts within the private sector and at the community level. Benefits of working together include offering a focal point for pollution prevention, reducing expenses by sharing knowledge and resources, minimizing duplication of effort and increasing grant application success, all of which will help significantly enhance the protection of Lake Superior, the Duluth-Superior Harbor and all their tributaries.

In the spirit of these objectives, the agencies represented by the signatories on this document agree to maintain a cooperative working relationship to promote stormwater pollution prevention.

This MOU does not create enforceable legal obligations, but rather is an expression of intent by the signatories to work with one another as partners to reduce stormwater pollution.

Nothing in this agreement is intended, nor shall it act in any way to alter, impede, or interfere with the authorities and procedures of the agencies involved in carrying out their regulatory and law enforcement responsibilities or their individual missions.

B. PURPOSE

Through this document, the members of the Regional Stormwater Protection Team establish a common agenda to work together on pollution prevention objectives and specific goals in a cost effective and consistent manner. Successful implementation of this collaboration effort will help to:

- Incorporate stormwater pollution prevention measures into local jurisdiction and agency programs and planning;

- Avoid a piecemeal approach to stormwater pollution prevention and program development;
- Share resources for stormwater pollution prevention projects;
- Enhance efficiency in the delivery of prevention services;
- Provide consistent regional environmental messages;
- Improve communication and interrelationships between agencies and local jurisdictions;
- Support existing agency missions and partnership agreements;
- Reduce stormwater peak flows and pollutant loads within the Western Lake Superior Watershed.

C. AREAS OF AGREEMENT:

The signatories agree to promote stormwater pollution prevention and pursue issues of mutual concern. In particular, the parties will strive to:

1. Seek opportunities to collaborate on stormwater pollution prevention projects of mutual interest, to demonstrate pollution prevention technologies and techniques.
   a) Stage periodic environmental show and tell events,
   b) Develop educational materials and co-sponsor workshops focused toward specific audiences,
   c) Develop an information clearinghouse,
   d) Identify areas where policies conflict and may need to be revised to achieve goals,
   e) Develop collaborative grant proposals.

2. Share, exchange and learn stormwater pollution prevention technologies and techniques through periodic meetings and joint training programs.
   a) Share strategies and progress in implementation,
   b) Provide relevant technology updates,
   c) Participate in environmental roundtable discussions,
   d) Share innovative ideas.

3. Demonstrate watershed-wide environmental leadership in stormwater pollution prevention.
   a) Promote stormwater pollution prevention through press releases and other interpretive programs conducted by participating agencies,
   b) Enhance watershed-wide efforts to increase communications and education about the importance of stormwater pollution prevention.

4. Seek opportunities to eliminate or reduce stormwater pollution and encourage use of efficient pollution prevention technologies and techniques.
   a) Identify root causes of stormwater pollution and take steps to reduce or eliminate wastes through stormwater pollution prevention techniques,
   b) Identify and overcome barriers to adoption of stormwater pollution prevention practices,
   c) Educate the general citizenry about stormwater pollution prevention through formal and informal education.

5. Cooperate in evaluating stormwater pollution prevention.
   a) Evaluate needs and goals of participating agencies,
   b) Determine what information is required to meet goals and needs,

c) Measure progress in reducing stormwater pollution.

6. Develop and demonstrate environmentally benign and beneficial alternatives to current non-sustainable practices.

D. ORGANIZATION STRUCTURE (see Attachment A)

Each participant shall designate at least one contact to monitor pollution prevention coordination activities within their singular jurisdiction. These individuals shall provide input to the RSPT on the initiative. The RSPT will oversee the development and implementation of the interagency initiative to facilitate communication and coordination on stormwater pollution prevention.

The RSPT meets regularly. All ideas are encouraged and welcome. Appropriate projects, workgroup formations, and courses of action are determined by a consensus of the members.

E. CHANGES TO THE AGREEMENT:

Amendments or additional appendices may be developed and implemented by mutual written agreement of the signatories at any time without renegotiating the entire MOU. A party may also terminate its participation in this agreement after providing 30 days written notice to the other parties.

F. EFFECTIVE DATE OF AGREEMENT:

This agreement is effective April 1, 2004 and will remain in effect for all parties unless and until they choose to formally terminate.

G. SIGNATORIES

Herb Bergson, Mayor	City of Duluth	Date
Richard Kieren, Mayor	City of Proctor	Date
David Allen, Mayor	City of Hermantown	Date
Dave Ross, Mayor	City of Superior	Date
Marcus Hall, Public Works Director	St. Louis County	Date
George Sundstrom, Chairperson	Duluth Township	Date

Earl Elde, Chairperson	Midway Township	Date
George Andrews, Chairperson	Rice Lake Township	Date
Todd Campbell, District Hydraulics Engineer	MN Dept. of Transportation	Date
Suzanne Hanson, Duluth Manager	Minnesota Pollution Control Agency	Date
Sue O'Halloran, Water Quality Specialist	Lake Superior Research Institute University of WI, Superior	Date
Greg Fox, Vice Chancellor Finance & Operations	University of MN-Duluth	Date
R.C. Boheim, Manager	South St. Louis Soil and Water Conservation District	Date
Kurt N.W. Soderberg, Executive Director	Western Lake Superior Sanitary Dist.	Date
Robert B. Peacock, Chairman	Fond du Lac Reservation Business Committee	Date
Carl Richards, Director	University of MN Sea Grant	Date
Lucinda Johnson, Associate Director	Center for Water and the Environment Natural Resources Research Institute University of Minnesota-Duluth	Date
Duane Lahti	Wisconsin Department of Natural Resources	Date
Lynelle Hanson	St. Louis River Citizens Action Committee	Date

Attachment A

BY-LAWS

Regional Stormwater Protection Team Operational Structure

The Regional Stormwater Protection Team shall work in the following areas:

I. Data collection and analysis
   A. Develop and maintain regional audiences' mailing lists and list of groups, organizations and trade associations.
   B. Develop and maintain a measurement system that analysis and assays outreach and communication efforts.

II. Outreach
   A. Develop a joint stormwater pollution prevention message and share it with companies, organizations, associations and the general citizenry.
   B. Develop and maintain educational materials to achieve awareness and compliance on a cooperative basis from citizens and businesses.

III. Communication
   A. Meet monthly to discuss stormwater pollution prevention issues facing the region.
   B. Communicate status of local, regional, state or national activities.
   C. Communicate on the status of specific regulatory decisions to the extent such decisions affect development of a regional stormwater pollution prevention management system.
   D. Develop technical assistance roundtable discussion groups.
   E. Share information about current and planned written materials.
   F. Develop additional relationships with related groups and organizations.

IV. Organization
   A. Chairperson: This position will serve no less than 12 months and is responsible for organizing and leading meetings.
   B. Vice Chair: This position will serve no less than 12 months and will prepare to serve as chair for the following 12 months.
   C. Fiscal Agents: Fiscal Agents identified in each successful grant application will prepare and present periodic fiscal statements to the Team.
   finances.
   D. Note taker: This position will serve on a monthly basis and is responsible for keeping and distributing meeting minutes.

Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 Pond, Wetland, and Lake Inventory Form

Municipal Separate Storm Sewer System (MS4) Program

Doc Type: Plans/Specifications/Maps

Name of MS4 Permittee	Date form completed	Unique ID Number	Type of Feature (Pond, Wetland or Lake)	Feature Common Name (If Applicable)	Y Coordinate (Latitude) Decimal Degrees	X Coordinate (Longitude) Decimal Degrees
U of M Duluth MS4	11/18/2013	ST3993	Pond	Rock Pond	46.823949	92.08741667
U of M Duluth MS4	11/18/2013	ST1293	Pond	Firehall Pond	46.81631667	92.08943333
U of M Duluth MS4	11/18/2013	ST1123	Pond	Swenson Pond	46.81681667	92.08773333
U of M Duluth MS4	11/18/2013	ST5713	Pond	Fleet-Grounds Pond	46.81898333	92.07785
U of M Duluth MS4	11/18/2013	ST3113	Pond	Eric Clarke Pond	46.82155	92.08481667
U of M Duluth MS4	11/18/2013	ST3363	Wetland	Eric Clarke Pond Wetland	46.82119722	92.08555278