Entity:	City of Helena	Permit Number:	MTR040003

Section A - Permit Authorization Number for Facility

Complete	Appropriate	Meets Requirement

Comment:

Section B - Facility or Site Informaion

Complete	Appropriate	Meets Requirement

Comment:

Section C - Applicant (Owner/Operator) Information

Complete	Appropriate	Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

Section D - Water Quality Priorities

ITEM 1

Complete	Appropriate	Meets Requirement

Comment:

ITEM 2

Incomplete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

Impairments lists need details.
Prickly Pear Creek - MT41I006_030:
Alteration in stream-side or littoral vegetative covers
Ammonia (Un-ionized)
Arsenic
Cadmium
Copper
Lead
Low flow alterations
Nitrogen (Total)
Phosphorus (Total)
Physical substrate habitat alterations
Sedimentation/Siltation
Temperature, water
Zinc

Tenmile Creek - MT41I006_143 :
Alteration in stream-side or littoral vegetative covers
Arsenic
Cadmium
Copper
Lead
Low flow alterations
Mercury
Nitrogen (Total)
Nutrient/Eutrophication Biological Indicators
Phosphorus (Total)
Sedimentation/Siltation
Zinc

ITEM 3

Entity:	City of Helena	Permit Number:	MTR040003

Complete	Appropriate	Meets Requirement

Comment:

ITEM 4

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

As per 75-5-103 MCA, Prickly Pear Creek and Ten Mile Creek meet the definition of "high-quality waters."
13) "High-quality waters" means all state waters, except:
(a) ground water classified as of January 1, 1995, within the "III" or "IV" classifications established by the board's classification rules; and
(b) surface waters that:
(i) are not capable of supporting any one of the designated uses for their classification; or
(ii) have zero flow or surface expression for more than 270 days during most years.

ITEM 5

Complete	Appropriate	Meets Requirement

Comment:

Section E - Public Education and Public Participation

ITEM 1

Complete	Appropriate	Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

ITEM 2

Complete	Appropriate	Meets Requirement

Comment:

ITEM 3

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

The response provided does not address the question. Tasks and events were listed rather than quantifying outcomes. The directions in Question 3 stated "Note specific successful outcome(s) (e.g. quantified reduction in fertilizer use; Do Not List tasks, events, publications) fully or partially attributable to your public education program during this reporting period."

ITEM 4

Complete	Appropriate	Meets Requirement

Comment:

Section F - Construction

ITEM 1

Complete	Appropriate	Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

ITEM 2

Complete	Appropriate	Meets Requirement

Comment:

ITEM 3

Complete	Appropriate	Meets Requirement

Comment:

ITEM 4

Complete	Appropriate	Meets Requirement

Comment:

ITEM 5

Complete	Appropriate	Meets Requirement

Comment:

ITEM 6

Complete	Appropriate	Meets Requirement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

ITEM 7

Complete	Appropriate	Meets Requirement

Comment:

ITEM 8

Complete	Appropriate	Meets Requirement

Comment:

Section G - Illicit Discharge Elimination

ITEM 1

Complete	Appropriate	Meets Requirement

Comment:

ITEM 2

Complete	Appropriate	Meets Requirement

Comment:

ITEM 3

Complete | Appropriate | Meets Requirement

Comment:

ITEM 4

Complete | Appropriate | Meets Requirement

Comment:

ITEM 5

Complete | Appropriate | Meets Requirement

Comment:

ITEM 6

Complete | Appropriate | Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

ITEM 7

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

The answer provided does not address the question. Helena provided a report of storm pipe and ditch inspected and cleaned rather than listing a frequency at which outfall inspections are conducted and any variations based on size/type. According to the General Permit II.B.3.b.iv., permittees must "identify the plan to detect and address illicit discharges to the system, including discharges form illegal dumping and spills. This plan must include documented procedures for screening outfalls, including frequency..." Helena must have a plan that identifies frequency for screening outfalls for illicit discharges.

ITEM 8

Complete	Appropriate	Meets Requirement

Comment:

ITEM 9

Complete	Appropriate	Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

ITEM 10

Complete	Appropriate	Meets Requirement

Comment:

ITEM 11

Complete	Appropriate	Meets Requirement

Comment:

ITEM 12

Complete	Appropriate	Meets Requirement

Comment:

Section H - Storm Water Management for Municipal Operations

ITEM 1

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

Storm water pollution prevention plans should be developed for :
all municipal turf grass/landscape management activities, all municipal maintenance yards, and all municipal waste handling and disposal areas.

Entity:	City of Helena	Permit Number:	MTR040003

ITEM 2

Complete	Appropriate	Meets Requirement

Comment:

ITEM 3

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

Question 3. The answer provided needs improvement. According to the General Permit II.B.6.b., "the permittee shall maintain documentation with respect to the decision process for the development of a pollution prevention/good housekeeping program for municipal operations...This documentation must include the following information at a minimum:
iii. The program description must specifically address the following areas:
(a)Maintenance activities, maintenance schedules, and long-term inspection procedures (including frequency) for controls to reduce floatables and other pollutants to the permitted Small MS4..."
Helena must develop inspection procedures, including frequency, for the municipal facilities listed in Section H, Question 1.

ITEM 4

Complete	Appropriate	Meets Requirement

Comment:

ITEM 5

Complete	Appropriate	Meets Requirement

Comment:

ITEM 6

Entity:	City of Helena	Permit Number:	MTR040003

Complete	Appropriate	Meets Requirement

Comment:

ITEM 7

Complete	Appropriate	Meets Requirement

Comment:

ITEM 8

Complete	Appropriate	Meets Requirement

Comment:

ITEM 9

Complete	Appropriate	Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

Section I - Long-term (Post-Construction) Storm Water Measuers

ITEM 1

Complete	Appropriate	Meets Requirement

Comment:

ITEM 2

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

The answer provided needs improvement. Helena refers to its Engineering Standards which does not address the question. In future reports, Helena must summarize the section that addresses retrofit requirements.

ITEM 3

Complete	Appropriate	Meets Requirement

Comment:

ITEM 4

Complete	Appropriate	Meets Requirement

Comment:

ITEM 5

Entity:	City of Helena	Permit Number:	MTR040003

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

Include flow durations in pre-development hydrology performance or design standards.

ITEM 6

Complete	Appropriate	Meets Requirement

Comment:

ITEM 7

Complete	Appropriate	Meets Requirement

Comment:

ITEM 8

Complete	Appropriate	Meets Requirement

Comment:

ITEM 9

Complete	Appropriate	Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

ITEM 10

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

The answer is incorrect. In Section L (I.9) Helena states, "one private site had BMPs installed improperly..." The answer to this question should have been one.

ITEM 11

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

The answer provided does not address the question. The answer provided discusses ordinance provisions and the question asks how long the permittee gives operators to remedy deficiencies idendified during inspections. In the future, the question should be properly addressed.

ITEM 12

Complete	Appropriate	Meets Requirement

Comment:

ITEM 13

Complete	Appropriate	Meets Requirement

Comment:

ITEM 14

Complete	Appropriate	Meets Requirement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

ITEM 15

Complete	Appropriate	Meets Requirement

Comment:

ITEM 16

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

It is recommended that the City of Helena set up a formal training schedule for the post-construction program.

Entity:	City of Helena	Permit Number:	MTR040003

Section J - Storm Water Management Program Resources

ITEM 1

Complete	Appropriate	Meets Requirement

Comment:

ITEM 2

Complete	Appropriate	Meets Requirement

Comment:

ITEM 3

Complete	Appropriate	Meets Requirement

Comment:

ITEM 4

Complete	Appropriate	Meets Requirement

Comment:

ITEM 5

Entity:	City of Helena	Permit Number:	MTR040003

Complete | Appropriate | Meets Requirement

Comment:

Section K - Evaluating/Measuring Progress

ITEM 1

Complete | Appropriate | Meets Requirement

Comment:

ITEM 2

Complete | Appropriate | Meets Requirement

Comment:

Section L - Additional Information

Complete | Appropriate | Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

Section M - Additional Information

Complete	Appropriate	Meets Requirement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

Section N1 - Public Education and Ourtreach on Storm Water impacts

a

Complete	Redundant	Recommendation for Improvement

Comment:

The following items are incomplete and need improvement.

1)Measurable goals should include the activity or BMP to be completed, a schedule or date of completion, and a quantifiable target to measure progress toward achieving the activity or BMP. The measurable goals listed do not include all the necessary components. A reference for Measurable Goals is www.epa.gov/npdes/pubs/measurablegoals.pdf.
2)Helena has provided nearly the same summary of compliance for three years (2010, 2011, and 2012). The compliance summary should be updated yearly to reflect updates and changes in the SWMP.
Specific control measure comments are detailed below.
II.B.3. ILLICIT DISCHARGE DETECTION AND ELIMINATION
Under General Permit Condition Item, Part II.B.3.b.iv., the Measurable Goal or Performance Standard Utilized, Helena reports, "routine screening will occur once per 5 years, with a goal of 20% of the system screened annually..." Frequency was not addressed in Section G, Question 7; however, it appears that outfall frequency is included in Helena's SWMP.
Future annual reports should be corrected to include all required information.

bi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

biv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bv

Complete	Appropriate	Meets Requirement

Comment:

See Section N comments in Section 1 a of this report.

bvi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bviii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Item 2 - Public Involvement/Participation

a

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bi

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bii

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

biv

Complete | Redundant | Recommendation for Improvement

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

See Section N comments in Section 1 a of this report.

bv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Entity:	City of Helena	Permit Number:	MTR040003

Section N3 - Illicit Discharge Detection and Elimination (IDDE)

ai

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aiii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aiv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

av

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

avi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

avii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Entity:	City of Helena	Permit Number:	MTR040003

biii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

biv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvii

Complete	Redundant	Recommendation for Improvement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

See Section N comments in Section 1 a of this report.

Section N4 - Construction Site Storm Water Runoff Control

ai

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aiii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aiv

Complete	Redundant	Recommendation for Improvement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

See Section N comments in Section 1 a of this report.

av

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

avi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Entity:	City of Helena	Permit Number:	MTR040003

biii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

biv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvii

Complete	Redundant	Recommendation for Improvement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

See Section N comments in Section 1 a of this report.

bviii

Complete	Appropriate	Meets Requirement

Comment:

See Section N comments in Section 1 a of this report.

bvix

Complete	Incorrect/Inconsistent	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Section N5 - Post-Construction Storm Water Management in New Development and Redevlopment

ai

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aii

Complete	Redundant	Recommendation for Improvement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

See Section N comments in Section 1 a of this report.

aiii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aiv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

av

Incomplete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

avi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

avii

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bi

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bii

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Entity:	City of Helena	Permit Number:	MTR040003

biii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

biv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvi

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvii

Complete	Redundant	Recommendation for Improvement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

See Section N comments in Section 1 a of this report.

bviii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bvix

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Section N6 - Pollution Prevention/Good Housekeeping for Municipal Operations

ai

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

aii

Complete	Redundant	Recommendation for Improvement

Entity:	City of Helena	Permit Number:	MTR040003

Comment:

See Section N comments in Section 1 a of this report.

aiii

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bi

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bii

Complete | Redundant | Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Entity:	City of Helena	Permit Number:	MTR040003

biii

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

biv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

bv

Complete	Redundant	Recommendation for Improvement

Comment:

See Section N comments in Section 1 a of this report.

Entity:	City of Helena	Permit Number:	MTR040003

Section O - Additional Detailed Information: Summary of Activities and Description of SWMP Effectiveness

1

Incomplete	Redundant	Recommendation for Improvement

Comment:

The following items are incomplete and need improvement.

1)Measurable goals need to include the activity or BMP to be completed, a schedule or date of completion, and a quantifiable target to measure progress toward achieving the activity or BMP. The measurable goals listed do not include all the necessary components. Results of measurable goals should then be reported in the Quantitative Indicators Used and Results section of the table.
2)In the Quantitative Indicators Used and Results rows, Helena listed proposed activities that were scheduled but not completed. Section O is a description of SWMP effectiveness during the past year and should only include activities that occurred.
3)Quantitative indicators are used to help permittees assess if the SWMP is meeting goals and objectives. Environmental Indicators range from Physical and Hydrological (i.e., stream temperature monitoring), to Biological (i.e., macro-invertebrate indicators), to Water Quality (i.e., toxicity testing). Administrative Indicators range from Social (i.e., public attitude surveys), to Programmatic (number of illicit connections identified and corrected), to Site (industrial site compliance monitoring) as detailed in the MPDES storm water MS4 Annual Report Form Instructions. It is recommended that Helena use a wider variety of quantitative indicators, including both environmental and administrative.
4)In the Impact on SWMP Effectiveness section, "nearly 2,900 people were present....." was used in multiple control measure subsections. For some activities, this is not an appropriate effectiveness measure. In future reports the impact on SWMP effectiveness should specifically target the activity.
5)Helena has provided nearly the same Summary of Activities for three years (2010, 2011, and 2012). The summary should be updated each year to reflect changes in the program.
Future annual reports should be corrected to include all required information.

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Comment:

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Comment:

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Comment:

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Comment:

10

Comment:

Entity:	City of Helena	Permit Number:	MTR040003

Section P - Additional Detailed Information: Planned Activities and Changes During Next Year

1

Incomplete	Redundant	Recommendation for Improvement

Comment:

The following are incomplete and need improvement.

1)Measurable goals need to include the activity or BMP to be completed, a schedule or date of completion, and a quantifiable target to measure progress toward achieving the activity or BMP. The measurable goals listed do not include all the necessary components.

2)Helena has provided the same Planned Activities for three years (2010, 2011, and 2012). This section should be updated each year.
Future annual reports should be corrected to include all required information.

2

Comment:

3

Comment:

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Comment:

Entity:	City of Helena	Permit Number:	MTR040003

5

Comment:

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Comment:

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Comment:

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Comment:

Entity:	City of Helena	Permit Number:	MTR040003

9

Comment:

10

Comment: