Storm Water Management Program

City of Helena, Montana

Small Municipal Separate Storm
Sewer System (MS4)

Permit Authorization Number MTR040003

April 2022 to March 2027

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1.0 Introduction

The City of Helena (City) is regulated by the Montana Department of Environmental Quality (DEQ) as delegated by the United States Environmental Protection Agency (EPA) under the National Pollution Discharge Elimination System (NPDES) as the owner and operator of a Phase II, Small Municipal Separate Storm Sewer System (MS4). EPA regulations require that small MS4s develop, document, maintain, and implement a Storm Water Management Program (SWMP) which includes management practices, control techniques, system designs, good standard engineering practices, and such other provisions necessary to reduce the discharge of pollutants from the permitted Small MS4 to the Maximum Extent Practicable (MEP). DEQ has primacy in Montana; therefore, federal NPDES regulations are incorporated by DEQ into Montana's General Permit for Storm Water Discharges Associated with Small MS4s (General Permit).

The City's MS4 has been covered by the Montana DEQ General Permit Number MTR040003, Authorization to Discharge under the Montana Pollutant Discharge Elimination System (MPDES) for four permit cycles: 2005 to 2009, 2010 to 2016, 2017 to March 31, 2022, and the April 1, 2022, to March 31, 2027. This SWMP builds upon the SWMP which was developed during prior permit cycles (SWMP 2010) by incorporating all of the components and activities of the 2017 SWMP while addressing new program requirements. The layout of this SWMP parallels the layout of the General Permit (Appendix B) which is effective from April 2022 to March 2027.

1.1 Background of Regulatory Requirements and Permit Coverage

Permit Reference: Part I.

The Clean Water Act was enacted in 1972 and established the basic structure for regulating the discharge of pollutants to waters of the United States in order to maintain Water Quality Standards for surface waters. Under the 1987 amendments to the Clean Water Act, industrial storm water systems and MS4s were required to obtain NPDES permits. In 1990, EPA promulgated rules establishing Phase I of the NPDES storm water program. The Phase I program for MS4s requires owners or operators of "medium" and "large" MS4s, as defined by those that typically serve populations of 100,000 people or more, to implement a storm water management program as a means to control polluted discharges from these areas.

The Storm Water Phase II Rule took effect in 1999 and extended coverage of the NPDES storm water program to certain "small" MS4s. The Phase II Rule takes a slightly different approach to how the storm water management program would be developed and implemented. Rather than individual permits, which were required for the Phase I MS4s, the proposed Phase II program is designed to accommodate a general permit approach using a Notice of Intent (NOI) as the permit application. Under the Phase II Rule, small MS4s are automatically designated on a nationwide basis if the municipality is located in "urbanized areas" (UAs) as defined by the United States Census Bureau, or if they are located outside a UA they are designated on a case-by-case basis by the NPDES permitting authority. Montana DEQ is the permitting

authority for Montana and designated the City as a Small MS4 under Administrative Rules of Montana (ARM) 17.30.1107.

1.2 MS4 Stakeholder Cooperative Process

To support the development of the 2017-2021 General Permit, Montana DEQ and the permitted MS4 cities (Billings, Missoula, Great Falls, Bozeman, Helena, Butte, and Kalispell) entered into a memorandum of understanding (MOU), to cooperatively discuss and document common Montana-specific issues with implementation of the MS4 program. As part of the process, the Cooperative Group developed Standard Forms, Checklists, and Protocols to be used for compliance with the General Permit. These Standard Forms, Checklists and Protocols have been adopted and revised, where appropriate, by the City under each of the Minimum Control Measures (MCMs) listed in the General Permit. Additionally, as part of the MS4 Stakeholder Cooperative Process, the group agreed to work collectively and produced the Montana Post-Construction Storm Water Best Management Practices Design Guidance Manual (Manual, September 2017) which contains a suite of DEQ endorsed Post-Construction Best Management Practices (BMPs). DEQ participated in development and funding of the Manual; therefore, using these BMPs will provide the regulatory predictability that both the MS4s and development community need. When implemented appropriately the BMPs in the Manual are intended to comply with the General Permit requirements. This Manual has been adopted by the City as part of its design guidance for development and redevelopment.

2.0 Storm Water Management Program

Permit Reference: Part II.A.

This SWMP describes how compliance is achieved through effective management of a storm water program inclusive of the General Permit's six MCMs:

1. Public Education and Outreach;
2. Public Involvement and Participation;
3. Illicit Discharge Detection and Elimination (IDDE);
4. Construction Site Storm Water Management;
5. Post-Construction Storm Water Management; and
6. Pollution Prevention and Good Housekeeping.

Additional provisions in the General Permit beyond the six MCMs which are part of this SWMP include:

- Training
- Monitoring Requirements
- Recording Requirements; and
- Reporting and Evaluation of the SWMP

Compliance with the six MCMs and the additional provisions relies on cooperation and activities of various departments throughout the City. The City also occasionally partners with community groups to participate in and support additional compliance activities. Permit compliance and

updates to the SWMP are located in the Permit Compliance and Updates to SWMP, Table 1 in Appendix K, and is updated annually.

The rationale for implementation of Post-Construction Storm Water Management Controls and TMDL Related Monitoring can be found in the following documents:

- The City of Helena Storm Water Master Plan (January 2003);
- The Updated City of Helena Storm Water Master Plan (December 2017); and
- The Lake Helena Watershed Restoration Plan 2016-2023 (December 2015)

The City will complete an annual report form for each calendar year within the General Permit term. If the City makes updates, changes, or improvements to the SWMP during the prior calendar year, an attachment to the annual report will be included to identify them. The General Permit and annual reports from the previous 5 years are available on the City's website.

Storm Water Management Team

The City's Storm Water Management Team (Team) is comprised of City personnel in the Public Works Department (Storm Water Engineer, City Engineer, Deputy Director of Public Works, Senior Engineering Tech, Utility Maintenance Supervisor, Environmental Manager, Water Treatment Superintendent, Wastewater Treatment Superintendent, and Solid Waste Superintendent) as well as the Parks and Recreation Superintendent, Transportation Systems Engineer, and Public Information Officer who are responsible for the development and implementation of the SWMP. The Team has both direct and indirect responsibilities associated with implementation of each MCM and of the SWMP. Where other departments have direct responsibilities for implementation of the SWMP, the Team will provide coordination, communication, assistance, and dissemination of information to assist other departments with SWMP compliance. The Team has established, documented, and executed formalized mechanisms of communication for regular communication between Team members to allow for exchange and submittal of information necessary to ensure permit compliance and timely reporting. The Team and the positions responsible for the implementation of the SWMP are shown on the Storm Water Management Team Organization Chart which is included as Figure 1a. in Appendix A.

Contact information for City personnel on the Team is located on the City's website and also included as Figure 2 in Appendix A.

Formalized Mechanisms of Communication

The City formalized mechanisms of communication include the use of software programs, an infrastructure acceptance policy, meetings, and standardized email procedures. The software programs include Tyler for building permitted projects, City Works for storm sewer maintenance and illicit discharge response, and City Sourced for community reporting and response. Engineering Design Standards and Infrastructure Acceptance Policy are utilized to standardize the requirements for projects involving infrastructure installation.

Annually, the City of Helena holds at least one in person and/or online meeting of the individuals that comprise the Team. One meeting is held in the winter to allow for:

- the exchange and submittal of information necessary to ensure permit compliance,
- to gather information to complete the annual report,
- to review tasks required for compliance in the upcoming year, and
- to review information exchange procedures between members of the Team for storm water compliance issues

Additional meetings may be convened as situations arise or as necessary to maintain permit compliance. This process is documented in Appendix B, City of Helena Formalized Mechanisms for Regular Communication of the Storm Water Management Team.

Software programs are used to log and track projects as well as illicit discharges. The software programs include Tyler, City Sourced, and City Works.

Tyler is used to log any project in the city which requires a building permit. Once a building submittal is logged into Tyler, each department or division personnel with reviewing responsibility is assigned a task. Engineering is assigned storm water reviews. The positions assigned the storm water reviews is the Storm Water Engineer, or in the absence of a Storm Water Engineer, other qualified Engineering Staff will be utilized as an alternate reviewer. The Storm Water Engineer, or alternate reviewer, uses the checklists and provides comments for incorporation into Tyler. These comments go back to the applicant and the process repeats once the applicant addresses the comments until the project is approved.

City Sourced (also know as Rock Solid or My Helena App) is a public facing web-based application for reporting issues with City managed infrastructure and services. The app records location information and includes the option for uploading photos or other media. Issues reported by members of the public or internal city staff are sorted by problem type to different departments throughout the city. The app handles notifications and tracking, with time dependent functions to remind users and escalate issues if they aren't resolved in a timely manner. The complaints are screened to ensure they are correctly classified and routed. There is a ticket type for illicit discharge, but any ticket that might contain an illicit discharge element is referred to City Engineering by the screener.

CityWorks is the City's work order tracking system for almost all activity City workers undertake in the field. CityWorks is used to create storm water maintenance and repair activities as well as track illicit discharge responses. Once an issue for maintenance, repair or cleanup is identified, the Utility Maintenance staff create a work order, assigns a schedule, tracks progress including: photos, videos or written communication, and upon compliance closes out the work order.

Infrastructure projects are received, filed, and reviewed through the City's infrastructure acceptance policy which is contained in the City's Engineering and Design Standards. When an infrastructure project is submitted to the City, it is checked in to the City's filing system contained on the City's network drives. The Development Services Engineer, then tracks and submits the submittal for review throughout the City including to the Storm Water Engineer. Comments are

returned to the Development Services Engineer and compiled into a letter which is returned to the applicant. Once the applicant responds to the comments the review process starts over until the plans are approved or the application is withdrawn.

2.1 MCM 1 and 2: Public Education, Outreach, Involvement, and Participation

Permit Reference: Part II.A.1.

The City has created and implemented a Public Education and Outreach Program (PEOP) to distribute educational materials to the community and conduct outreach activities about the impacts of storm water discharges on water bodies and the steps the public can take to reduce pollutants in storm water runoff. Based on the City's local knowledge of storm water pollutant generating activity within the MS4, the City documents which business types and/or residential behaviors from those listed in the General Permit, are common sources of pollutant, illicit discharges, spill, and/or dumping within the permitted MS4 boundaries. The City annually selects at least four applicable key target audiences to address pollutant generating behavior through storm water education and outreach. The intent of this program is to educate the key target audiences about the behaviors and activities that have the potential to pollute storm water discharges while motivating the community to change behaviors in order to reduce pollutants in storm water runoff. In addition to the City's individual outreach and education efforts, the City's PEOP also partners with numerous community groups to accomplish its outreach and education goals through funding and coordinated outreach and education activities. Some of the outreach and education activities the City implements include:

- Pet Waste Stations
- Educational videos on pet waste cleanup and automotive fluids recycling options
- Latex Paint Exchange Day
- Household Hazardous Waste Day
- Lake Helena Watershed Festival
- Social media posts
- City Newsletter distributions
- Public displays in the City and County Building providing water quality information
- City of Helena Storm Water website information
- Participation in various community events
- Supply educational information about Fats, Oils, and Grease to restaurants

The following sections describe the ongoing and planned future activities which the City will implement in its PEOP in accordance with the General Permit's requirements.

Permit Reference: Part II.A.1.a.i.

The City actively operates a public website with information relating to storm water, waste disposal, pollution prevention, industrial permitting, and restaurant operation. The website can be found at https://www.helenamt.gov. More specifically, the City has a public storm water webpage located at https://www.helenamt.gov/Departments/Public-Works/Utility-Maintenance/Storm-Water and contains the following information:

- General information regarding the storm water program;
- A copy of the General Permit for Storm Water Discharge;
- A copy of the Notice of Intent application and supplemental information submitted to DEQ;
- Access to outreach strategy information and materials;
- Applicable outreach event information;
- Most current Storm Water Management Program (SWMP);
- At least five years of most recent annual reports submitted to DEQ;
- A mechanism for providing public input for the SWMP including contact information and directions for comments, questions, and complaints.
- Information regarding how to identify and report illicit discharges.
- Permittee requirements for construction activities and how to submit related complaints.

The Notice of Intent application form and supplemental application information, the updated General Permit and a minimum of five years of annual reports are posted to the website within 90 days of the effective date of the General Permit.

Permit Reference: Part II.A.1.a.ii.

The City will provide at least one formal opportunity annually for the public involvement/participation. During the event, the public will be able to provide comment on the SWMP and the City will document all relevant input, responses, and SWMP modifications made as a result. The request for the public to provide comment on the SWMP will be held the between October and December of each year. The City will document the relevant input and responses and make the resulting modifications to the SWMP as necessary. If deemed necessary, a second follow up request for public comment on the SWMP could occur in December. The City will again document the relevant input and responses and make the resulting modifications to the SWMP as necessary. The City will utilize its Be Heard Helena webpage to request, track, record, and respond to the public's comments. The City will comply with all state and local public notice requirements by publishing the opportunity for public involvement/participation at least twice and 6 days apart prior to the event.

Permit Reference: Part II.A.1.b.i., and b.ii.

Based on the City's local knowledge of storm water pollutant generating activity within the MS4 the business types and residential behaviors identified in Table 1 are identified as common sources of pollutants, illicit discharges, spills, and/or dumping within the permitted MS4 boundary. The City selects a minimum of four applicable key target audiences per year to address pollutant generating behavior through storm water education and outreach. The key target audiences are reviewed annually and pollutants associated with each identified.

Table 1: Key Target Audience Identification and Selection

	Residential Behavior	Business Type	Reasoning for Selection	Associated Pollutants	Annual Review & Update Conducted
Key Target Audience #1	Pet Waste		Common source of pollutants	Nutrients and Pathogens	01/09/2026
Key Target Audience #2	General Common Education		Dumping within the permitted MS4	Latex Paint	01/09/2026
			Dumping within the permitted MS4	Non-point Source Pollutants	01/09/2026
Key Target Audience #3		Post Construction Facility Owners	Dumping within the permitted MS4	Latex Paint	01/09/2026
Key Target Audience #4	Car Washing and Care		Common source of pollutants and spills	Automotive Fluids	01/09/2026
Key Target Audience #5		Construction Industry	Common source of pollutants	Sediment	01/09/2026

Permit Reference: Part II.A.1.c.i, and c.ii.

For each of the target audiences identified annually, a minimum of one outreach strategy is selected. The City implements at least four outreach activities per year, and at least two of the outreach activities selected for the key target audiences each year are Active Outreach Strategies. Some of the activities are the same from year to year, but activities may be added, altered or removed each year based on the annual key target audience and pollutant review. For each key target audience, the outreach strategy and planned time frame for implementation for the upcoming year are identified and this information is included in the annual report. See Table 2 for the selected outreach activities for each of the current Key Target Audiences.

Table 2: Key Target Audience Outreach Strategy and Planned Timeframe

	Residential Behavior	Business Type	Passive Outreach Strategy	Active Outreach Strategy	Planned Timeframe
Key Target Audience #1	Pet Waste			Part in Comm Event	04/15-10/31
			Pet Waste Stations and Informative Articles or Stories		Continuous
Key Target Audience #2	General Common Education			Latex Paint Cleanup Event	04/15-05/15
				Latex Paint Cleanup Event	09/01-10/31
				Part in Comm Event	04/15-10/31
			Social Media/ Newsletter		Continuous
Key Target Audience #3		Post Construction Facility Owners		Latex Paint Cleanup Event	04/15-05/15
				Latex Paint Cleanup Event	09/01-10/31
Key Target Audience #4	Car Washing and Care		Social Media/ Newsletter		Continuous
Key Target Audience #5		Construction Industry		Industry Specific Training	Continuous

Permit Reference: Part II.A.1.d.i., d.ii., and d.iii.

After the outreach strategy for each key target audience is implemented, the City documents, participation and feedback using at least one performance tracking method. The City maintains the records on selected key target audiences, outreach strategies, and performance tracking methods. The City uses the resulting information and/or measurements to direct education and outreach resources most effectively and will document any modifications in the SWMP. See Table 3 for the selected performance tracking method for each of the current Key Target Audiences.

Table 3: Key Target Audience Implementation and Performance Tracking

	Residential Behavior	Business Type	Date Implemented	Performance Tracking Method	Comments
Key Target Audience #1	Pet Waste		01/01- 12/31	Total Distribution	Pet Waste Stations, Total Distribution is measure by number of bags utilized per year.
			01/01- 12/31	Website Analytics	City of Helena Pet Waste Pick-Up outreach video.
Key Target Audience #2	General Common Education		04/15-05/15	Total Weight Collected	Annual Spring Latex Paint Exchange
			09/01-10/31	Total Weight Collected	Annual Fall Latex Paint Exchange
			08/01-08/31	Total Event Participants	Annual Lake Helena Watershed Festival with water conservation, pollution reduction methods, activities, and demonstrations
			04/01- 04/30	Total Event Participants	Mayor's Water Challenge
			04/15- 10/31	Total Event Participants	Farmers' Market Informational Booths
			01/01/- 12/31	Total Distribution	Seasonally timed Social Media and Newsletter articles
Key Target Audience #3		Post Construction Facility Owners	4/15- 05/15	Total Weight Collected	Annual Spring Latex Paint Exchange
			09/01- 10/31	Total Weight Collected	Annual Fall Latex Paint Exchange
Key Target Audience #4	Car Washing and Care		01/01- 12/31	Total Distribution	Seasonally timed Social Media and Newsletter articles
Key Target Audience #5		Construction Industry	01/01- 12/31	Total Distribution	Provide targeted industry specific training to individuals pre and post construction activity.

2.2 MCM 3: Illicit Discharge Detection and Elimination

The City's SWMP includes an array of BMPs with a common goal to detect, prevent, and eliminate illicit discharges into the City's MS4. Illicit discharge BMPs specific to this MCM are discussed herein; however, this SWMP focuses on illicit discharges as a priority by providing BMPs within the other MCMs that also address illicit discharges.

Permit Reference: Part II.A.2.a.i.

The City conducts video surveys of its storm water system on a regular basis and has not observed any evidence of significant non-storm water discharges to its system. As such, the City is not currently aware of any non-storm water discharges that are significant contributors of pollutants to the storm water system. An Ordinance is in affect which prohibits illegal discharges which contain pollutants that cause or contribute to a violation of applicable water

quality standards or that could cause the City to be in violation of the General Permit. The specific section of the Ordinance that addresses illegal discharges can be found in Title 6, Chapter 6-10 of the City Code and a copy of the Ordinance is provided in Appendix I. Potential for non-storm water discharges which are significant contributors of pollutants will be reviewed annually based on observations from video survey and addressed in each annual report.

The following non-storm water discharges are exempt from the Ordinance and are not considered an illegal discharge:

- Water Line Flushing (excluding hyperchlorination)
- Landscape Irrigation
- Diverted Stream Flows
- Rising Groundwater
- Uncontaminated Groundwater Infiltration
- Uncontaminated Pumped Groundwater
- Discharge from Potable Water Sources
- Foundation Drains
- Air Conditioning Condensation
- Irrigation Water
- Springs
- Footing Drains
- Lawn Watering
- Individual Residential Car Washing
- Natural Flows from Riparian Habitat and Wetlands
- Street Wash Water
- Firefighting Activities

Permit Reference: Part II.A.2.a.ii.

Table 4 provides a list of occasional incidental non-storm water discharges that will not be addressed as illicit discharges. These will not be addressed as illicit discharges because the information available to the City indicates that these non-storm water discharges are not reasonably expected to be significant contributors of pollutants to the MS4. This list will be reviewed annually and any revisions will be included in each years' annual report.

Table 4: Occasional Incidental Non-Storm Water Discharges not to be addressed as Illicit Discharges

Occasional Incidental non-storm water discharge	Potential Pollutants	Local Controls or Conditions	Reason for non-significance
Charity Car Washes	Sediment and Phosphorous	None	Infrequent occurrence
Sprinkler System Overspray and breaks	Chlorine	None	Overspray and breaks are usually repaired by the owner or reported by residences or City personnel.
Residential Car Washes	Sediment and Phosphorous	None	Infrequent and small scale
Waterline flushing	Chlorine	No discharges to State Waters Capture in Regional Storm Water Ponds	No discharges to waterways
Main Breaks	Chlorine	Isolation/Termination	Rare and unpredictable
Fire Fighting	Chlorine and Fire Suppression Chemicals	Standard Operating Procedures	Emergency Response

The City is not aware of any occasional incidental non-storm water discharges that contribute a significant amount of pollutants to the storm water system. An Ordinance is in affect which prohibits illegal discharges which contain pollutants that cause or contribute to a violation of applicable water quality standards or that could cause the City to be in violation of the General Permit. A copy of the Ordinance is provided in Appendix I.

Permit Reference: Part II.A.2.b.i

The City has created a comprehensive Geographic Information System (GIS) database of the storm sewer system within the municipal boundary. The storm sewer system GIS database includes outfalls, piping, inlets, manholes, conveyance channels, streams and ponds. Pipe sizes range from approximately 12 inches to 84 inches in diameter. Ponds range from regional flood control and water quality ponds to private and public water quality, detention, and infiltration ponds. The information available within the GIS database is too extensive to be accurately and completely shown on a hard copy map. However, Figure A.1 – Overall Storm System and Basin Map (see Appendix A) provides a graphical representation of the overall storm system by showing primary basins, existing outfalls, storm water ponds, and storm drains. The Overall Storm System and Basin Map is updated regularly throughout the year as developments occur, capital improvement projects are completed, and as needed to improve accuracy.

As part of the mapping and IDDE program, the City annually conducts video surveys on a portion of the storm sewer system. The annual videos are used to access the condition of the

pipe, identify areas requiring future maintenance and replacement, and to detect illicit connections. Illicit discharge connections that are discovered during the video inspection are given a high priority for investigation and corrective action based on the results of the investigation.

Permit Reference: Part II.A.2.b.ii.

High priority outfalls are selected using inspection and screening results, storm sewer maps, and the outfalls proximity to Waters of the United States. In determining the high priority outfalls, the City considered: industrial areas, areas with previous illicit discharges, known illegal dumping areas, oldest portions of the storm sewer infrastructure, areas with onsite sewage disposal systems, and areas discharging to an impaired water body. The City will review and update high priority outfalls on an annual basis.

The City of Helena is in the drainage basin for two 303d listed waters: Prickly Pear Creek and Ten Mile Creek. However, neither creek is within the City of Helena and the outfalls are approximately ¼ mile to over a mile from the listed waters. The closest connection to the listed waters is through Crystal Springs Creek which is groundwater fed tributary to Ten Mile Creek. Based on this evaluation of connectivity to the listed waters a high priority area tributary to Crystal Springs Creek was identified and the storm water outfalls from that area are identified at the high priority outfalls for the city (See Figure A.5 Priority Drainage Basin Map). Based upon the evaluations, a list of high priority outfalls was developed as follows:

Outfalls for the City of Helena

	Outfall No.	Basin	Outfall BMP	Outfall Conveyance	Street Location	Screening Results
High Priority Outfalls	3	Westside	Henderson Retention Pond Complex	48 inch CMP	Silsbee Ave and Mitchell near Fairgrounds	No discharge, inlet and outlet monitoring location
	4		Fairgrounds Detention Pond	18 inch CMP	Fairgrounds east of Arena	No inflow or outflow. Dry bottom, thick grass and some woody plants.
	5		North Stone Meadows Detention Pond	Earth spillway	Andesite Ave and crystal springs creek	No inflow or outflow. Dry bottom. Vegetation still filling in.
	6		Central Stone Meadows Detention Pond	8 inch PVC	Benton Ave and Flagstone Ave	No inflow or outflow. Moist bottom, some cattails.
	7		South Stone Meadows Detention Pond	8 Inch PVC	Benton Ave south of Obsidian Ave	No inflow or outflow. Dry bottom, thick grass.

	Outfall No.	Basin	Outfall BMP	Outfall Conveyance	Street Location	Screening Results
	8		Crystal Springs Detention Pond	12 inch PVC	Benton and Willowbrook	No inflow or outflow. Moist bottom, thick grass and cattails.
	9		Our Redeemers Pond	6 inch PVC	SW corner of N Benton and Obsidian Ave	No inflow or outflow. Dry bottom, thick dry grass.

Permit Reference: Part II.A.2.c.i

An Illicit Discharge Investigation and Corrective Action Plan (IDICAP) was developed, and a copy is included in Appendix D.

Permit Reference: Part II.A.2.d.i

An Emergency Response Plan (ERP) was developed, and a copy is included in included in Appendix H.

Permit Reference: Part II.A.2.d.ii

An Ordinance is in affect which prohibits illegal discharges which contain pollutants that cause or contribute to a violation of applicable water quality standards or that could cause the City to be in violation of the General Permit. A copy of the Ordinance is provided in Appendix I.

Permit Reference: Part II.A.2.d.iii.

Not applicable (the City does not have neighboring MS4s as the County area is not currently designated as a Small MS4) and Montana Department of Transportation has an individual MS4 Permit.

Permit Reference: Part II.A.2.e.i.

Outfall inspections are completed using the Montana MS4 Outfall Inspection Form included in Appendix G. This inspection form is based upon the field screening protocol developed by the Center for Watershed Protection. The City intends to inspect and screen all of its outfalls during dry weather by the end of this five year permit cycle. Progress will be documented in each year's annual report. A list of the outfalls from Helena's MS4 municipal boundary is provided in Table 5 and the location of each outfall is shown on Figure A.1 (see Appendix A)

Table 5: Outfalls for the City of Helena

Outfall No.	Drainage Basin	Outfall BMP	Outfall Conveyance	Street Location
1	Westside	East Simmons Detention Pond	30 inch	Broadwater Ave and spring meadow
2		West Simmons Detention Pond	12 inch	Broadwater and Motor Ave

Outfall No.	Drainage Basin	Outfall BMP	Outfall Conveyance	Street Location
3		Henderson Retention Pond Complex	24 inch 24 inch	Silsbee Ave and Mitchell near Fairgrounds
4		Fairgrounds Detention Pond	16 inch	Fairgrounds east of Arena
5		North Stone Meadows Detention Pond	8 inch	Andesite Ave and crystal springs creek
6		Central Stone Meadows Detention Pond	10 inch	Benton Ave and Flagstone Ave
7		South Stone Meadows Detention Pond	8 Inch	Benton Ave south of Obsidian Ave
8		Crystal Springs Detention Pond	Open Channel	Benton and Willowbrook
9		County Shop Detention Basin	Open Channel	E of N Benton and Willowbrook Drive
10	Last Chance	Nature Park Retention Pond, and on-site detention/ret ponds	24 inch	McHugh Lane north of Golden Estates subdivision
11		Golden Estates Detention Pond	18 inch	Jade Street and Amethyst Ave (golden estates)
12		Skelton Detention 1, 2, 3, and 4	24 inch	North of Ptarmigan and Montana Ave
13		Anderson BP Detention and open channel	Open Channel	S of Road Runner and Sand Piper
14	Davis	Target Retention Pond	36 inch	Jordan Drive behind Macy's
15		Davis Region Pond and Kmart Pond	48 inch	I-15 Regional Ponds
16	Bull Run West	Burnham Ranch Retention Pond		
17		Helena Regional Detention and York and Custer Detention	55 inch	York Road north of Custer
18	Airport	Airport Detention 4, 5.1, and 5.2 and 1400ft of open channel	21 inch	Canyon Ferry Road east of Y-county
19		Airport Retention R-13 and National Guard, Helena Aviation, Fire and D10 Detention	48 x 60 inch	Helena Valley Canal Crossing east of National Guard
20		Airport Retention R-910 and Detention Pond 2	54 inch	Helena Valley Canal Crossing east end Airport
21		Walmart Detention 1 and 2	36 in	NW of Miller and Carter
22		Staples Detention	18 in	NW of Miller and Carter

Outfall No.	Drainage Basin	Outfall BMP	Outfall Conveyance	Street Location
23	Bull Run Upstream of Airport	Future Nichole St Pond	36 in	N of Nichole St and RR Tracks
24		Open Channel	Open Channel	N of Dick Anderson Construction
25		Hunters Point and Mountain West Bank Detention	Open Channel	N of I15, upstream of Synness Auto Salvage
26		Nob Hill Retention 1 and 2, and Nob Hill Detention 1, Grass swale along I15	24 in	NW of I15 and Mendocino Drive
27	Far East	Nob Hill Detention 4	Open Channel	Colonial drive south of Nob Hill Lift station
28		Aspen Meadows Detention	84 inch	Alice street East of Crossroads Pkwy
29		Grass channel, small basin at culvert inlet	2-24 inch	Crossroads Pkwy and Prospect Ave (highway 12)
30		West Aspen Meadows Retention	24 inch	Alice street East of Cascade Ave
31		East Aspen Meadows Retention	42 inch	Twilight and Stillwater streets
32		East Aspen Meadows Retention	12 inch	Runkle Pkwy between Still water and Alpine View
33		Open Channel for 700ft	12 inch	Runkle Pkwy and Highway 282
34		Aspen Meadows Detention North and South	36 inch	Highway 282 south of Runkle Parkway

Permit Reference: Part II.A.2.e.i.and ii.

An outfall inspection form was created in coordination with DEQ during the development of the 2017-2021 permit cycle which is intended to be an equivalent process to the Center for Watershed Protection. High priority and outfall inspections are completed annually using the Montana MS4 Outfall Inspection Form included in Appendix D.

2.3 MCM 4: Construction Site Storm Water Management

The City requires by Storm Water Ordinance and in the Engineering and Design Standards that an owner or operator obtain coverage from DEQ under the General Permit for Storm Water Discharges Associated with Construction Activity (Construction General Permit) when applicable. The Construction General Permit is obtained by application through DEQ's Water Protection Bureau. This Construction General Permit regulates sites that disturb one acre or more, including projects disturbing less than one acre that are part of a larger common plan of development, redevelopment, or sale. DEQ's Water Protection Bureau also has inspection and enforcement authority for projects permitted by DEQ under the Construction General Permit.

The program for this MCM includes a review and approval process through the software program Tyler for all private building permitted projects; an Infrastructure Acceptance Policy in the Engineering and Design Standards for infrastructure improvement projects; and inspection of active construction projects. Records related to these projects and inspections are maintained in the City's electronic files.

Permit Reference: Part II.A.3.a.i.

The City has a Construction Storm Water Management Plan Review Checklist which is consistent with the minimum required Technology-Based Effluent Limits as required by the current Construction General Permit. The City will implement the Construction Storm Water Management Plan Review Checklist for all sites which require a Construction General Permit. Per the City's Ordinance, each of these sites must also develop and submit an NOI and SWPPP to DEQ in order to be granted coverage under the Construction General Permit. The City will not issue building or construction permits and approvals until the SWPPP meets the Construction General Permit requirements. A copy of the checklist is provided in Appendix E.

Permit Reference: Part II.A.3.b.i.

The City maintains and implements a Construction Storm Water Inspection Form developed by the Cooperative Group for the minimum required Technology Based Effluent Limits as required by the Construction General Permit. A copy of the Construction Storm Water Inspection Form is provided in Appendix E. Permittees operating under the Construction General Permit are also subject to Compliance Evaluation Inspections (CEIs) by DEQ.

Permit Reference: Part II.A.3.b.ii.

The City maintains lists of regulated projects which disturb one acre or more. The lists include those from DEQ's website with the City's MS4, a list of the infrastructure projects which are typically more that one acre of disturbance, and a list of building permitted projects that are more than one acre in size. The City downloads the DEQ list of Effective Storm Water Construction Authorizations by County at a minimum annually and maintains the list in their MS4 files. The City uses the DEQ list each construction season to perform informal drive by inspections and formal inspections, and to identify which are inactive and need to be terminated. The City uses the other two lists for infrastructure projects and building project to cross-reference with the DEQ list. The construction SWPPP review check list and the construction site

storm water inspection frequency determination protocol sheet contain information about the construction project regarding the size, topography, and proximity to water bodies. Additionally, detailed information about each site is contained in the drainage reports which are submitted for review of development projects.

Permit Reference: Part II.A.3.b.iii.

The City maintains a construction storm water inspection frequency determination protocol form developed by the Cooperative Group. The protocol evaluates sites based on priority and determines an inspection frequency based on priority. High priority sites will be noted on the list that is maintained under Part II.3.b.ii., and the minimum inspection frequency for high priority sites are as follows:

- Once at commencement of construction after BMPs have been implemented;
- Once within 48 hours after each rain event of 0.25-inches or greater;
- Once within 48hours after each occurrence of runoff from snowmelt due to thawing conditions that cause visible surface erosion at the site; and
- Once at the conclusion of the project prior to finalization.

A copy of the construction storm water inspection frequency determination protocol form is provided in Appendix E.

Permit Reference: Part II.A.3.b.iv.

The City will implement the Construction Storm Water Inspection Form annually for one or more active projects which have been granted coverage by DEQ under the Construction General Permit and have been approved for construction by the City.

Permit Reference: Part II.A.3.c.i

An Ordinance is in affect which requires a coverage under the Construction General Permit for all regulated construction activities which disturb one acre or more. The specific section of the Ordinance that addresses construction storm water activity can be found in Title 6, Chapter 6-15 of the City Code and a copy of the Ordinance is contained in Appendix I. The Ordinance includes provisions requiring submission of an executed copy of the DEQ Notice of Intent and a Storm Water Pollution Prevention Plan (SWPPP) to the City. The Ordinance also includes a provision requiring compliance with all provisions of the MPDES Construction General Permit. Since coverage under DEQ's Construction General Permit is required by City Ordinance, the minimum standards described as non-numeric technology-based effluent limits in the Construction General Permit are thereby required.

Permit Reference: Part II.A.3.c.ii.

Not applicable.

Permit Reference: Part II.A.3.c.iii.

An ERP was developed and is being implemented to ensure compliance with the construction storm water management regulatory mechanisms. The ERP is included in Appendix H.

2.4 MCM 5: Post-Construction Site Storm Water Management in New and Redevelopment

Permit Reference: Part II.A.4.

The City has developed, implemented and enforces a program which address storm water runoff to prevent or minimize water quality impacts from development and redevelopment project which disturbs one acre or more, including projects disturbing less than one acre that are part of a larger common plan of development, redevelopment, or sale. The City also requires new development which creates 5,000 square feet (ft^2) or more of impervious area to address storm water runoff to prevent or minimize water quality and quantity impacts. All projects meeting or exceeding these limits are required to design, implement and maintain post-construction storm water management controls that meet the performance standard described in Part II.A.5.b.iii of the General Permit.

The program for this MCM includes a review and approval process for private projects; quality control and quality assurance process for capital improvement projects; and regularly scheduled maintenance and inspection of all parts of the MS4. Records related to these projects, maintenance activities and inspections are maintained in the City's electronic files.

Permit Reference: Part II.A.4.a.i.

The City uses the Post-Construction Storm Water Management Plan Review checklist developed from the Cooperative Group to ensure consistent review of submitted plans and to determine and document compliance with state and local post-construction requirements. The City process for infrastructure acceptance is outlined in the City Engineering and Design Standards which includes Post-Construction BMPs. A copy of the Post-Construction Storm Water Management Plan Review checklist is provided in Appendix F.

Permit Reference: Part II.A.4.a.ii.

The City has adopted an ordinance requiring a Storm Water Drainage Plan for new and redevelopment when 5,000 square feet or more of impervious area are created. The specific section of the ordinance that addresses the Storm Water Drainage plan can be found in Title 6, Chapter 6-15 of the City Code and copy of the ordinance is provided in Appendix I. The City of Helena Engineering and Design Standards also require any new or redevelopment project to prepare a Storm Water Drainage Plan that must infiltrate, evapotranspire, or capture for reuse the runoff from the entire water quality storm event. The water quality storm event is defined as 0.5-inch of precipitation from a 24-hour storm event.

The City of Helena has allowed two elementary schools to partially treat storm water off-site. These two schools are Bryant School and Central School. No other developments have been allowed to treat storm water offsite.

Permit Reference: Part II.A.4.b.i. though iv.

The City uses the Post-Construction Storm Water Management Inspection Form developed by the Cooperative Group to ensure consistent and thorough inspections of post-construction storm water management controls. The Post-Construction Storm Water Management Inspection Form is provided in Appendix F.

The City maintains a GIS database of all its storm water facilities including all new and existing public and private post-construction storm water management controls. A table printout of the information contained in the GIS database for post-construction storm water management retention, detention and infiltration BMPs is included in Appendix F. This database will continue to be updated as post-construction storm water management controls are installed within the MS4 boundary.

Post-Construction Offsite Storm Water Management

The City owns and operates regional storm water quality, detention and retention ponds throughout the MS4 area. These regional storm water ponds have and will continue to provide water quality and flood control protection for existing development, in addition to providing post-construction offsite storm water management for new and redevelopment when allowed by the City. A list of the high priority regional storm water ponds is provided in Table 6. A map showing location of regional ponds and high priority ponds shown on Figure A.2 – Regional Storm Water Ponds and Treatment Basins Map (see Appendix A).

Table 6: High Priority Storm Water Ponds

Regional Watershed	MS4 Drainage Basin	Regional PCSWMC	MS4 Outfall Basin	Location Description	Screening Summary	Inspection frequency
Prickly Pear Creek	Bull Run and Airport	Airport Retention R-910 John Newbo 406-439-2516	Fields south of Prickly Pear Creek	East end of airport, south of Helena valley Canal	Oversized Large pond with dry grass - no inflow or outflow	Once per permit cycle
		Helena Regional Detention	Outfall to drainage system along York Road		Pond with dry grass, inlet clean out maintenance to remove sediment - no inflow or outflow	Once per permit cycle
	Far East Area	Aspen Meadows Retention	Outfall to RR and Highway 12 swales	North of Allice Street, east of Cascade St, adjacent to RR	Pond with dry grass - no inflow or outflow	Once per permit cycle
		Aspen Meadows Retention Pond 3	Outfall to dryland fields and drainage	East of Alpine Road, North of	Pond with dry grass on slopes and pool of water	Once per permit cycle

Regional Watershed	MS4 Drainage Basin	Regional PCSWMC	MS4 Outfall Basin	Location Description	Screening Summary	Inspection frequency
			leading to E Helena Smelter	Powderhorn Court	in bottom – no inflow or outflow	
		Aspen Meadows Detention Pond 4	Outfall to dryland fields and drainage leading to E Helena Smelter	Adjacent to Hwy 282, south of Runkle Road	Pond with dry grass and woody plants – no inflow or outflow	Once per permit cycle
	Davis Gulch	Davis Gulch Pond	Outfall to Davis Gulch irrigation channel and fields south of Prickly Pear Creek	Northeast of Washington St and Frontage Dr round-a-bout	Oversized Large pond with dry grass some woody plants - no inflow or outflow	Annually
		Kmart Pond	Outfall to channel and pipe system leading to Davis Gulch Pond	North of Harris and Cole intersection	Series of wet ponds – trickle inflow and outflow	Annually
Tenmile Creek	Last Chance Gulch	Nature Park Pond	Outfall to channel along McHugh	South of Cole and McHugh intersection	Natural pond with low flow inflow and no outflow.	Annually
	Westside Area	Overlook Pond	Outfall channel to Spring Meadows Ponds	South of Euclid	Pond with dry grass some shrubs - no inflow or outflow	Once per permit cycle
		Simmons Pond	Outfall channel to Spring Meadows Ponds	South of Broadwater Ave	Pond with dry grass - no inflow or outflow	Once per permit cycle
		Henderson Pond	Outfall small creek leading to VanHook Wetlands	East of Henderson, South of Custer	Oversized Large pond with dry grass - no inflow or outflow	Annually

Permit Reference: Part II.A.4.c.i.

An Ordinance is in affect which requires post-construction storm water management controls for development and redevelopment project which disturbs one acre or more, including projects disturbing less than one acre that are part of a larger common plan of development, redevelopment, or sale and new development which creates 5,000 ft^2 or more of impervious area. The specific section of the Ordinance that addresses post-construction storm water management controls can be found in Title 6, Chapter 6-15 of the City Code and a copy of the Ordinance is provided in Appendix I. All post-construction storm water management controls must meet the performance standard described in Part II.A.5.b.iii of the General Permit.

Permit Reference: Part II.A.4.c.ii.

A formal ERP was developed and implemented during prior permit cycle. The ERP is included in Appendix H.

Permit Reference: Part II.A.4.d.i.

The City of Helena has been and continues to evaluate its program for improvement. The City of Helena has been proposing revisions to its Engineering and Design Standards since 2022 and is still working through the process of adopting revised standards. The revised standards include significant revisions, updates, and clarifications to the storm water standards including updates to the water quality treatment practices to improve the use of Low Impact Development (LID) practices. Since water quality treatment ponds first order of compliance is for retention and infiltration of runoff from the first 0.5 inches of rainfall, LID practices will become a more apparent option.

2.5 MCM 6: Pollution Prevention/Good Housekeeping for Permittee Operations

The City operates and maintains permittee owned facilities and conducts activities including training with the intent of reducing pollutant runoff from permittee operations, and ultimately from its MS4 outfalls.

Permit Reference: Part II.A.5.a.i.

The City has developed an inventory of permittee owned facilities and activities, including potential contaminants for each facility and activity. The inventory is included in Appendix G.

Permit Reference: Part II.A.5.a.ii.

The City of Helena has developed SOPs for each of the City Owned Facilities included in the inventory. As part of the standard operating procedures (SOP) for the various facilities and activities, the City uses on-site and off-site structural storm water pollution controls. Portions of the MS4 are utilized to convey runoff to the off-site structural storm water pollution controls where off-site controls are part of the SOP. The SOPs are included in Appendix G.

Permit Reference: Part II.A.5.a.iii.

The City has developed and maintains a GIS database which includes the location of City owned facilities. Activities occur on City owned property depending on the use of the property. The GIS database is regularly updated throughout the year as property is acquired or sold. A map showing the locations of the City owned facilities is included in Appendix G.

Permit Reference: Part II.A.5.a.iv

Development of SOPs was completed at the end of the prior permit term. Annual training on the SOPs has been implemented and is on-going annually for this permit cycle. Coordination and

training of the facility manager on the permit requirements is conducted in the first year of this permit.

3.0 Training

Permit Reference: Part II.B

Within the first year of the permit term, Members of the Storm Water Management Team will receive comprehensive training to educate them about permit updates and implementation responsibilities for the upcoming permit term.

At least once during the permit term, Construction Site Personnel will receive training for Construction Site Storm Water Pollution Prevention Plan (SWPPP). Training will include inspectors and plan reviewers, responsible for Construction Site Storm Water Management Minimum Measure (MCM 4). Training shall include at a minimum, inspection protocol and implementation for the MS4's ERP.

At least once during the permit term, Post-Construction Suite Personnel responsible for the implementation of the Post-Construction Site Storm Water Management Minimum Measure (MCM 5) Inspector training shall include, at a minimum, inspection protocol and implementation of the the MS4's ERP.

During the first and fourth year of the permit term, Field and Facility Personnel responsible for completing work activities with storm water pollution potential will receive field and facility training. This shall include any staff or field crews subject to oversight through SOPs as part of the Pollution Prevention and Good Housekeeping Minimum Measure (MCM 6). The training will include at minimum education regarding the following:

- An overview of the current permit and the requirements contained therein.
- Potential storm water impacts.
- The detection and elimination of illicit discharges.
- BMPs necessary to minimize discharges of pollutants during City activities or the operation of City owned facilities.
- Any SOP updates completed as a result of the required work under MCM 6.

All new hires that fall into one of the training categories with potential to impact storm water pollutant contributions will receive the training required for their category within 90 days of their hire date.

The Table 7 shows the City's training requirements for each of the four training categories (1. Storm Water Management Team, 2. Construction Site Personnel, 3. Post-Construction Site Personnel, and 4. Field and Facility Personnel) along with the titles of the personnel in those categories. Field and Facility personnel include the superintendent for that facility along with a "worker" category. The City has identified positions requiring training instead of specific individuals due to the potential for personnel changes. Each Superintendent/Supervisor is responsible for identifying which "workers" require the training identified in the table.

Typical training topics by category and position are shown in Table 7, including a list of potential training that may be utilized.

Table 7: SWMP Training

Training Number	Training Category	Title	Training
1	SWMP Team -First year of permit (2022)	City Engineer	Internal Training- Comprehensive internally created and provided training for all members of the storm water management team to educate them about permit updates and implementation responsibilities.
		Deputy Director of Public Works	
		Storm Water Engineer	
		Public Information Officer	
		Utility Maintenance Supervisor	
		Parks & Recreation Superintendent	
		Water Treatment Superintendent	
		Wastewater Treatment Superintendent	
		Solid Waste Superintendent	
		Transportation Systems Engineer	
		Engineering Tech	
		Environmental Manager	
2	Construction Site Personnel	Storm Water Engineer	SWPPP Certification & Internal Training (inspection protocol and ERP implementation)
		Environmental Manager	
3	Post Construction Site Personnel	Storm Water Engineer	SWPPP Certification & Internal Training (inspection protocol and ERP implementation)
		Environmental Manager	
4	Field and Facility Personnel - First and fourth year of the permit (2022 & 2025)	Utility Maintenance Superintendent	Internal Training – An overview of the permit and requirements, potential storm water impacts, IDDE, BMPs, facility and activity specific SOPs.
		Utility Maintenance Supervisor(s)	
		Utility Maintenance Worker	
		Parks & Recreation Superintendent	
		Parks, Recreation, and Open Space Worker	
		Water Treatment Superintendent	
		Water Treatment Plant Worker	
		Wastewater Treatment Superintendent	
		Wastewater Treatment Plant Worker	
		Solid Waste Superintendent	
		Solid Waste Worker	
		Transportation Engineer	
		Transportation Worker	

The City may outsource the necessary trainings identified in Table 7 as “Internal Training” in whole or in part with comparable third-party trainings to ensure training requirements for each category are sufficiently met.

4.0 Monitoring

Permit Reference: Part II.C.

The City is within the drainage basin of two perennial streams that are impaired waterbodies listed on the Montana 303(d) list: Tenmile Creek and Prickly Pear Creek (see Figure A.3 – Excerpt Drainage Map from Lake Helena TMDL, Appendix A). A Total Maximum Daily Load (TMDL) was developed for these waterbodies as part of the Framework Water Quality Restoration Plan and TMDL for the Lake Helena Watershed, August 31, 2006 by the Environmental Protection Agency (Lake Helena TMDL). *The Lake Helena TMDL identifies that storm water pollutant loading from regulated storm water discharges contributes less than 0.5% of the total load for nitrogen, phosphorous, and sediment to either Tenmile Creek or Prickly Pear Creek drainage basins. Although the Lake Helena TMDL does not propose any new requirements for regulated storm water, it does recommend monitoring and/or model based evaluations to estimate pollutant removal efficiencies of structural and non-structural BMPs (Lake Helena TMDL, Appendix J).*

The City is part of the Lake Helena Watershed Restoration Plan 2016-2023, prepared by Lewis and Clark County Water Quality Protection District. This report discusses the Characterization of the Watershed; Pollutants, Sources, Existing Pollutant Loads and Allocations; Lake Helena Watershed Restoration Priorities; Expected Load Reductions; and Best Management Practices.

The City permitted MS4 area is bound by the City limits. The permitted area includes six primary drainage areas which include the Westside Area, Last Chance Gulch, Davis Gulch, Bull Run, Airport, and Far East (see Figure A.1, Appendix A). Additionally, the Montana Department of Transportation (MDT) operates a regulated MS4 within the City.

USGS Mapping shows no surface connection of drainage ways to Prickly Pear Creek or Tenmile Creek except at Crystal Springs Creek (see Figure A.4 – USGS Map of Helena Area, Appendix A). The majority of the City does not discharge directly into either creek because the City boundary ends prior to the creeks where storm water runoff infiltrates into alluvial fans and is retained and infiltrated in Regional Storm Water Ponds (See Table 6) prior to the municipal boundary.

Approximately 12.5 square miles of the City of Helena are treated by Regional Storm Water Ponds as shown on Figure A.2 (see Appendix A). Only portions of the Westside basin area below the regional ponds are expected to have a potential to discharge storm water runoff during minor events into tributaries of Ten Mile Creek. These portions of the Westside basin area are tributary to Spring Meadow Lake and Crystal Springs Creek. The area below the regional ponds in the Westside basin is shown on Figure A.5 – Priority Drainage Basins Map (see Appendix A).

Storm Event and TMDL Monitoring

The four monitoring locations are shown in the Table 8.

Table 8: Storm Event and TMDL Monitoring Locations

Monitoring Site ID	Representative Area	Monitoring Location Description	Approximate Latitude/Longitude
004	Residential/Commercial	Inlet to Nature Park Pond	46.60385°N, -112.03167°W
005	Residential	Inlet to DNRC Pond	46.58862°N, -112.01431°W
007	Residential	Inlet to Alice Pond	46.60889°N, -112.05069°W
008	Commercial/Industrial	Outlet to Target Pond	46.62303°N, -112.01788°W

Specific Monitoring Parameters

The City monitors for the parameters in the following table excerpted from the General Permit.

Table 9: Small MS4 Monitoring Requirement

Parameter (1,2)	Frequency	Type (3)
Total Suspended Solids (TSS), mg/L	Semi-annual	Grab or Composite
Chemical Oxygen Demand (COD), mg/L	Semi-annual	Grab or Composite
Total Phosphorus, mg/L	Semi-annual	Grab or Composite
Total Nitrogen, mg/L	Semi-annual	Grab or Composite
pH, standard units	Semi-annual	Instantaneous
Copper, mg/L	Semi-annual	Grab or Composite
Lead, mg/L	Semi-annual	Grab or Composite
Zinc, mg/L	Semi-annual	Grab or Composite
Estimated Flow, gpm	Semi-annual	Instantaneous (4)
Oil and Grease (5), mg/L	Semi-annual	Grab

(1) Detection limits are pursuant to levels defined in Circular DEQ-7.
(2) Total recoverable methods to be used on all metals.
(3) See Definitions in Part VI. of this General Permit.
(4) Estimated flow rates are appropriate in cases where measurement gauges are not installed.
(5) Hexanes extraction (EPA Method 1664A).

Permit Reference: Part II.C.2.b.

The City of Helena's BMPs include numerous storm water control and water quality ponds both public and private. The City has several very large storm water ponds along and at the ends of each of the drainage basins. These ponds were studied in the 2018 Storm Water Master Plan

and have been shown to be highly effective at retaining and percolating storm water runoff from the City. The City is on an alluvial fan with generally high percolation rates and in a semi-arid climate. The City's largest tributary basin is 7 square miles which is identified as Last Chance Gulch. The next largest basin is 3.5 square miles and is identified as Davis Gulch. All of these factors, including field monitoring and observations have shown that the City of Helena does not discharge storm water and therefore meets goals in the Lake Helena TMDL. The City's TMDL monitoring plan is shown above in Table 8. As permitted by Part II.C.2.b.i. in the General Permit, the City's storm event and TMDL monitoring sites are the same as shown in Table 8.

5.0 Sharing Responsibility and Qualifying Local Program

Permit Reference: Part III.A

The City has determined the shared responsibility of the implementation of a minimum control measure with another entity is not necessary. The City does however require qualifying projects to obtain coverage under DEQ's Construction Storm Water Permit, specifically the Construction General Permit including documents, process and responsibilities to aid in the City's implementation of MCM 4. DEQ's Water Protection Bureau issues the Construction General Permit and has inspection and enforcement authority for permitted projects. This General Permit is issued by the DEQ under the authority of 75-5-402, Montana Code Annotated (MCA) and Sections 402 and 303 of the Federal Clean Water Act. ARM 17.30.1105 requires any person who discharges or proposes to discharge "storm water discharge associated with construction activity", as defined in ARM 17.30.1102(28), to get MPDES permit coverage.

Permit Reference: Part III.B.

Not applicable.

Permit Reference: Part III.C.

The City implements the SWMP on all new areas added to the MS4.

References

City of Helena. (2013). *Engineering and Design Standards.*

Environmental Protection Agency. (August 31, 2006). *Framework Water Quality Restoration Plan and TMDL for the Lake Helena Watershed.*

HDR, Inc. (February 19, 2010). *City of Helena Storm Water Management Program Documentation 2010-2014.*

HDR, Inc. (January 2003). *Storm Water Master Plan.*

Lewis and Clark County Water Quality Protection District. (December 2015). *Lake Helena Watershed Restoration Plan 2016-2023.*

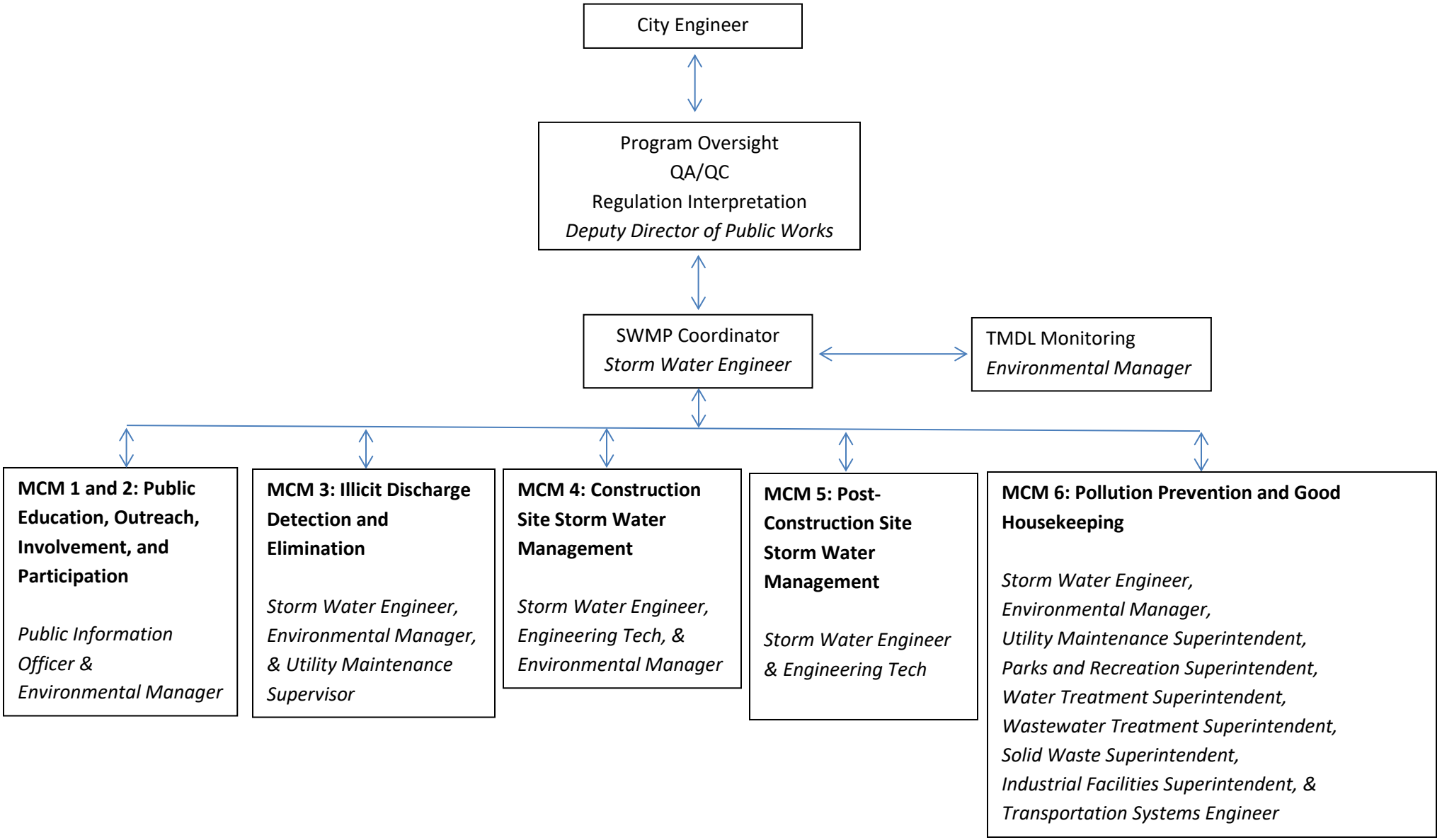
WGM Group, Inc. (n.d.). *Storm Water Master Plan Update, March 2018.*

Montana Post-Construction Storm Water Best Management Practices Design Guidance Manual (September 2017)

Appendix A. Supplemental Tables and Figures

Figure 1a.

City of Helena - Storm Water Management Team Organizational Chart



Contact Information for Each Individual of the SWMT

Position	Employee Name	Phone Number	Email
City Engineer	Jamie Clark	4064478098	jclark@helenamt.gov
Deputy Director of Public Works	Ed Coleman	4064478059	ecoleman@helenamt.gov
Storm Water Engineer	Elizabeth Petersen	4064478093	epetersen@helenamt.gov
Public Information Officer	Amanda Opitz	4064478401	aopitz@helenamt.gov
Environmental Manager	Leea Anderson	4064478096	landerson@helenamt.gov
Utility Maintenance Supervisor	Trent Scheuer	4064578575	tscheuer@helenamt.gov
Parks and Recreation Superintendent	Pat Marron	4064478485	pmarron@helenamt.gov
Water Treatment Superintendent	Janice Sanderson	4064578511	jsanderson@helenamt.gov
Wastewater Treatment Superintendent	Jeff Brown	4064578558	jbrown@helenamt.gov
Solid Waste Superintendent	Pete Anderson	4064478088	panderson@helenamt.gov
Transportation Systems Engineer	Mark Young	4064478099	myoung@helenamt.gov
Engineering Tech	Nate Ragsdale	4064478429	nragsdale@helenamt.gov

Overall Storm System and Basins
City of Helena, MT

Sevenmile Creek
Tenmile Creek
WWTP Effluent Canal
Helena Valley Canal
Prickly Pear Creek

West Basin
Last Chance Gulch Basin
Davis Gulch Basin
Airport Basin
Bull Run Basin
Far East Basin

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34

Legend

- Existing Outfalls
- Storm Water Pond
- Helena Canals & Irrigation Ditches
- Streams
- Storm Drain
- Helena City Limits

Layer

Storm Basins

- Airport Basin
- Bull Run Basin
- Davis Gulch Basin
- Far East Basin
- Last Chance Gulch Basin
- West Basin

0.5 Miles

CITY OF HELENA
Est. 1881

Regional Storm Water Ponds & Treatment Basins

City of Helena, MT

Tenmile Creek

Davis Gulch Ponds

Henderson Pond

Helena Regional Detention

Helena Valley Canal

Kmart Ponds

Allison Pond

Nature Park Pond

Simmons Pond

Overlook Pond

Airport Retention R-910

Prickly Pear Creek

Airport Basin

West Basin

Davis Gulch Basin

Last Chance Gulch Basin

Bull Run Basin

Aspen Meadows Retention Pond

Far East Basin

Aspen Meadows Retention 3 Pond

Aspen Meadows Retention 4 & 5 Ponds

Legend

- High Priority Storm Drain
- Helena City Limits
- Regional Stormwater Ponds

Layer2

Storm Basins

- Airport Basin
- Bull Run Basin
- Davis Gulch Basin
- Far East Basin
- Last Chance Gulch Basin
- West Basin

0.5 Miles

CITY OF HELENA

Est. 1881

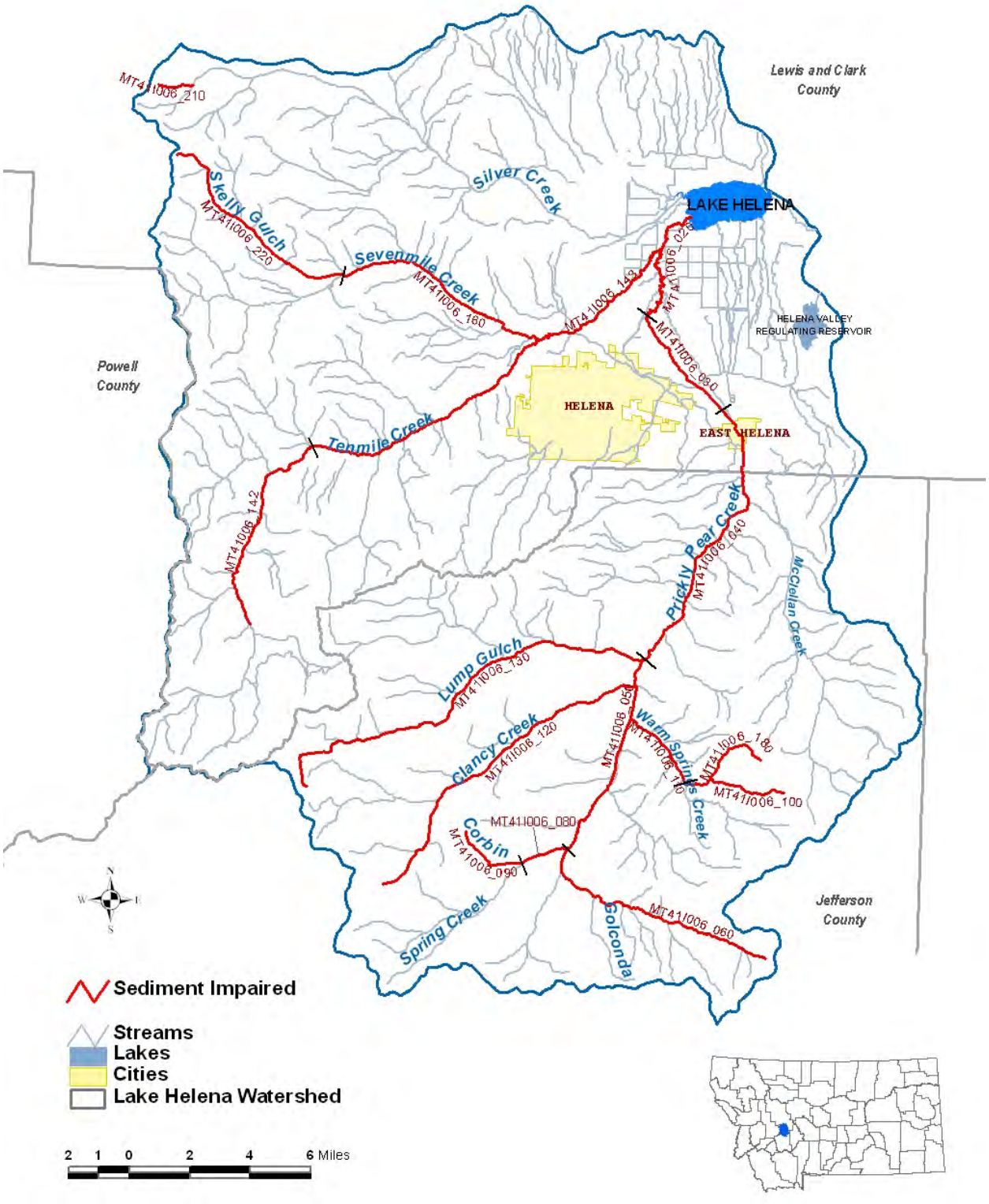
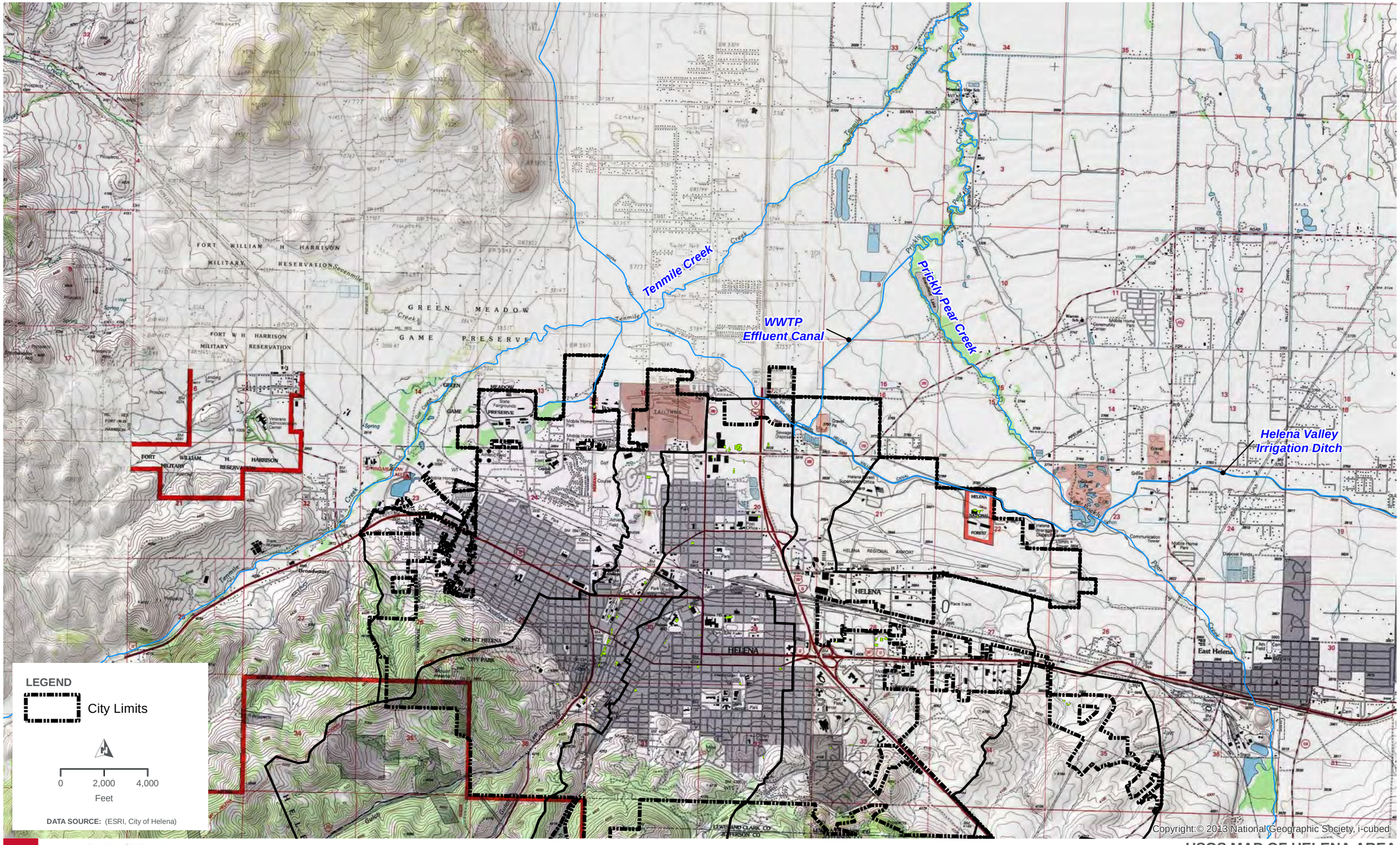


Figure A.3 - Excerpt Drainage Map from Lake Helena TMDL

Taken from *Framework Water Quality Restoration Plan and TMDL for the Lake Helena Watershed [EPA, 2006]*



HELENA MONTANA
QUEEN CITY OF THE ROCKIES

USGS MAP OF HELENA AREA

CITY OF HELENA, MT

FIGURE A.4

Priority Drainage Basin

City of Helena, MT

Tenmile Creek

Tenmile Creek

3

4

5

6

7

8

9

10

12

13

Henderson Pond

Allison Pond

Nature Park Pond

Legend

- Priority Drainage Basin
- Helena Canals & Irrigation Ditches
- Regional Stormwater Ponds
- Streams
- Storm Drain
- Storm Drain
- Helena City Limits
- Existing Outfalls

0.18 Miles

CITY OF HELENA

Est. 1881

Storm Event & TMDL Monitoring Locations
City of Helena, MT

Tenmile Creek

Henderson Pond

Simmons Pond

Overlook Pond

Allison Pond

007 Residential

Nature Park Pond

004 Residential/Commercial

West Basin

Last Chance Gulch Basin

Davis Gulch Basin

005 Residential

Davis Gulch Ponds

Helena Regional Detention

Kmart Ponds

Helena Valley Canal

Airport Basin

Airport Retention R-910

Prickly Pear Creek

006 Commercial/Industrial

Bull Run Basin

Aspen Meadows Retention Pond

Far East Basin

Aspen Meadows Retention 3 Pond

Aspen Meadows Retention 4 & 5 Ponds

Legend

- TMDL Monitoring Locations
- Storm Drain
- Streams
- Regional Stormwater Ponds
- Helena City Limits

Layer

Storm Basins

- Airport Basin
- Bull Run Basin
- Davis Gulch Basin
- Far East Basin
- Last Chance Gulch Basin
- West Basin

0.5 Miles

CITY OF HELENA
Est. 1881

Appendix B. General Permit

GENERAL PERMIT
FOR
STORM WATER DISCHARGES ASSOCIATED WITH SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s)

PERMIT NUMBER MTR040000

MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY

AUTHORIZATION TO DISCHARGE UNDER THE MONTANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (MPDES)

In compliance with Section 75-5-101 *et seq.,* Montana Code Annotated (MCA); Administrative Rules of Montana (ARM) 17.30.1101; 17.30.1301 *et seq.; and ARM* 17.30.601 *et seq.,* applicants with an authorization letter issued under this *General Permit for Storm Water Discharges Associated with Small Municipal Separate Storm Sewer Systems (Small MS4s)* are permitted to discharge storm water resulting only from Small MS4s in accordance with effluent limitations, monitoring requirements, and other conditions set forth herein.

This Permit shall become effective April 1, 2022.

This Permit and the authorization to discharge shall expire at midnight, March 31, 2027.

FOR THE MONTANA DEPARTMENT
OF ENVIRONMENTAL QUALITY

|S| Jon Kenning

Jon Kenning, Chief
Water Protection Bureau

Modification Date: July 11, 2022

Contents

I. COVERAGE UNDER THIS GENERAL PERMIT

Montana Pollutant Discharge Elimination System (MPDES) General Permit MTR040000 is a fifth generation Comprehensive General Permit for storm water discharges associated with Small Municipal Separate Storm Sewer Systems (MS4s).

A. Coverage Area of Permitted MS4s

This permit covers areas that are served by, or contribute to, municipal separate storm sewers that discharge to state waters as follows:

1. Traditional MS4s

Geographic areas of permit coverage for cities and counties listed in ARM 17.30.1102(23)(a) include the U.S. Census designated urbanized areas in accordance with the most recent census. For cities listed in ARM 17.30.1102(23)(b), the area of coverage includes the entirety of the municipal incorporated boundary.

2. Non-Traditional MS4s

For all other permitted MS4s as identified in accordance with ARM 17.30.1102(23)(d), the geographic areas of permit coverage are the portion of the permittee's jurisdiction that is within the permitted Traditional MS4.

B. Eligibility for Coverage

Regulated Small MS4s are required to apply for, and obtain, authorization for discharge of storm water into state waters. This General Permit does not authorize or supersede permitting requirements for storm water discharges associated with industrial or construction activity, or discharges covered under another MPDES permit. This General Permit does not relieve the permittee from any other statute, regulation, permit, or other regulatory requirements for activities occurring within their area, not associated with permitted storm water discharges from Small MS4s.

C. Ineligibility for Coverage

DEQ may deny an application for discharge under this General Permit for any of the following:

1. The discharge is unable to comply with:
   a. Effluent limits or other terms and conditions of the permit, including those listed in the Special Conditions;
   b. Water quality standards; or
   c. Discharges that the regional administrator has objected to in writing.
2. The discharge is different in degree or nature than those reasonably expected from sources or activities described in this General Permit.
3. The same operation has previously been denied or revoked an MPDES permit or authorization.
4. The discharge is also included within an application, or is subject to review under, the Major Facility Siting Act.
5. The point source is, or will be, located in an area of unique ecological or recreational significance based upon:
   a. Montana stream classifications;
   b. Impacts on fishery resources;
   c. Local conditions at proposed discharge sites; and
   d. Areas designated wilderness or wild and scenic rivers.

6. The discharge is from process wastewater regulated by federal effluent limit guidelines or new source performance standards. Process wastewater is defined as any water, which during manufacturing or processing, comes into direct contact with, or results from the production or use of, any raw material, intermediate product, finished product, byproduct, or waste product.
7. Any additional requirements DEQ determines are necessary to carry out the provisions of 75-5-101, et seq., MCA.

DEQ may require any authorized Small MS4 to obtain an individual permit instead, citing one or more of the following reasons:

1. A water quality management plan has been approved that contains requirements applicable to categories or subcategories of discharges or facilities covered in a general permit.
2. DEQ has determined the Small MS4 is a significant contributor of pollution.
3. A change has occurred in the availability of demonstrated technology or practices for the control or abatement of pollutants applicable to the Small MS4.
4. The discharger is not in compliance with the conditions of this General Permit.
5. Circumstances have changed since the time of request for coverage so that the Small MS4 is no longer appropriately controlled under the General Permit.
6. Effluent limitations guidelines (ELGs) have been promulgated for facilities covered under this General Permit.
7. A change has occurred in any condition that requires either a temporary or permanent reduction or elimination of the discharge authorized under this General Permit.

If an individual MPDES permit is issued to any regulated Small MS4, coverage under this General Permit is terminated on the effective date of the finalized individual MPDES permit.

D. Requirements for Authorization

Owners or operators of Small MS4s must apply for coverage under a MPDES General Permit by completing a Notice of Intent (NOI) application package. A complete NOI application package includes an NOI form (provided by DEQ), applicable fees (specified in ARM 17.30.201), and any additional items listed in 1-3, below. The package shall be completed and submitted to:

Montana Department of Environmental Quality
Water Protection Bureau
P.O. Box 200901
Helena, Montana 59620-0901

If there are deficiencies with the NOI application package, DEQ may deny authorization under this permit or contact the MS4 for additional information necessary to meet requirements. If the request for coverage is denied, the applicant may withdraw the request or modify the MS4's operations to meet the conditions of this permit and re-apply. If the permittee is denied authorization and the NOI application package is not withdrawn or modified, DEQ shall proceed to process the application through individual MPDES permit requirements. DEQ will contact the applicant regarding ineligibility and request more information, as needed.

Small MS4s eligible for coverage will be issued a letter of authorization confirming coverage under this 2022 General Permit. Submittal of the NOI application package and receipt of an authorization letter does not eliminate a permittee's obligation to obtain other necessary permits, including MS4-related activities that utilize the storm sewer system as a conveyance for non-storm water discharges.

Permittees may apply as co-permittees. Co-permittee authorizations are when multiple Small MS4s apply for coverage under a single permit authorization number. They shall be jointly responsible for compliance under the General Permit. Each co-permittee must submit a separate application package to obtain authorization.

1. New Applicants

New MS4s must submit a complete NOI package within 180 days of designation including:

- A completed *Storm Water Discharge Associated with MS4s Notice of Intent Application Form* (NOI-04);
- Applicable application fees; and
- A copy of the storm sewer map(s) extending one mile beyond MS4 boundaries submitted electronically via GIS shapefiles, hard copy PDFs, or reference to available online maps.

Based on the status of the newly designated MS4's storm water program, DEQ will provide a compliance schedule regarding the comprehensive requirements in this General Permit. At a minimum, an unregulated MS4 seeking coverage that has not been previously authorized will be required to:

- Develop, implement, and enforce a Storm Water Management Program in accordance with the compliance schedule no later than five years from the initial date of permit authorization.
- Self-monitor starting three years from the date of authorization, providing flexibility for the permittee to establish a storm water monitoring program.

2. Continued Coverage

Permittees seeking continued coverage shall submit a complete NOI package within 30 days of the effective date of this General Permit including:

- A completed *Storm Water Discharge Associated with MS4s Notice of Intent Application Form* (NOI-04);
- Applicable renewal fees;
- A copy of the storm sewer map(s) extending one mile beyond MS4 boundaries submitted electronically via GIS shapefiles, hard copy PDFs, or reference to available online maps; and
- A link to the MS4s current storm water website and the most current version of the Storm Water Management Program.

II. EFFLUENT LIMITS AND MONITORING REQUIREMENTS

Under this General Permit, discharges containing pollutants associated with Small MS4s will be controlled through the development, implementation, and enforcement of a written Storm Water Management Program (SWMP). The SWMP shall be designed to implement Best Management Practices (BMPs) and reduce the discharge of pollutants from the permitted Small MS4 to the maximum extent practicable (MEP). Implementation of the SWMP consistent with the requirements of this General Permit shall constitute compliance with reduction of pollutants to the MEP and satisfy the appropriate water quality requirements of the Montana Water Quality Act (MWQA).

A. Storm Water Management Program

The permittee must develop, document, maintain and implement a SWMP which includes management practices, control techniques, system designs, good standard engineering practices,

and such other provisions necessary to reduce the discharge of pollutants from the permitted Small MS4 to the MEP. This section describes the minimum required BMPs for implementation. DEQ requires BMPs that are selected, designed, installed, implemented, inspected, and maintained (or replaced based on inspections) in accordance with good engineering, hydrologic, and pollution control practices.

The permittee shall effectively manage a storm water program inclusive of the six minimum control measures (MCMs): Public Education and Outreach; Public Involvement and Participation; Illicit Discharge Detection & Elimination; Construction Site Storm Water Management; Post-Construction Site Storm Water Management in New and Redevelopment; and Pollution Prevention/Good Housekeeping for Permittee Operations. Permittees must retain documentation, specifications, and standard operating procedures used for BMP selection in accordance with the MCMs listed below.

The permittee shall effectively implement a storm water program inclusive of a storm water management team, comprised of persons responsible for implementation of the SWMP. During the entire permit term, all permittees must establish, document, and execute formalized mechanisms for regular communication (meetings, email updates, etc.) between storm water management team members to allow for exchange and submittal of information necessary to ensure permit compliance and timely reporting. The storm water management team shall be developed to include a primary SWMP coordinator, as well as an organizational chart which identifies the position(s) responsible for implementing each minimum measure. The team organization shall be reviewed annually, and any updates shall be submitted with annual reports (section II.E.1).

The Department may require changes to the SWMP as needed to:

- Address impacts on receiving water quality caused, or contributed to, by discharges from the Small MS4.
- Include more stringent requirements necessary to comply with new federal statutory or regulatory requirements.
- Include other conditions deemed necessary by the Department to comply with the goals and requirements of the Montana Water Quality Act.
- Update BMPs to improve program effectiveness based on information and/or data submitted in permittees' annual reports.

Changes requested by the Department must be made in writing, provide a schedule for the permittee to develop the changes and update their program, and offer the permittee the opportunity to propose alternatives to meet the objective of the requested changes.

All permittees shall comply with the following MCMs and document any updates annually in a report submitted to the Department by March 1st of each year (see section II.E.1. *Annual Report and SWMP Updates*). Implementation of required BMPs shall be documented in the permittee's SWMP, including updates and rationale for decision making.

Minimum Measure	Required BMP
1. MCMs 1 and 2: Public Education, Outreach, Involvement, and Participation • Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps the public can take to reduce pollutants in storm water runoff. • Implement a public involvement/participation program to involve key target audiences in the development and implementation of the SWMP that complies with state and local public notice requirements.	
a. Develop and continue to utilize the permittee's storm water website for public involvement.	i. Annually review and update a storm water website that, at a minimum, includes the following: • A copy of, or link to, this General Permit • A copy of the Notice of Intent application form submitted to DEQ including all supplemental information • Access to outreach strategy information and materials • Applicable outreach event information • Most current version of the SWMP and any supporting documents • At a minimum, five years of most recent annual reports submitted to DEQ • A mechanism for providing public input for the SWMP including contact information and directions for comments, questions, and complaints • Information regarding how to identify and report illicit discharges • Permittee requirements for construction activities and how to submit related complaints • The Notice of Intent application form and supplemental application information, the updated General Permit and a minimum of five years of annual reports must be posted on the website within 90 days of the effective dates of this General Permit. ii. Provide a minimum of one opportunity annually for the public to provide comments on the SWMP. Document all relevant input, responses, and SWMP modifications made as a result.
b. Determine key target audiences most appropriate for storm water education and outreach.	i. Based on the permittee's local knowledge of storm water pollutant generating activity within their MS4, document which business types and/or residential behaviors from the list below are common sources of pollutants, illicit discharges, spills, and/or dumping within the permitted MS4 boundaries. Select a minimum of four applicable key target audiences to address pollutant generating behavior through storm water education and outreach. **Residential Behaviors:** • Car Washing/Care • General Common Education • Hazardous Waste Disposal

	• Home Chemical Care • Lawn & Garden Care • Pet Waste **Business Types**: • Carpet Cleaning/Restoration Companies • Construction Industry • Gas Stations • Industrial Facilities & Operations • Landscapers • Mobile Cleaning/ Pressure Washing • Post Construction Facility Owners • Restaurant or Food Trucks Note: DEQ may approve or require additional key target audiences. ii. Review key target audiences annually and identify the pollutants associated with each.
c. Identify and develop outreach formats, distribution channels, and messages for each key target audience and associated storm water polluting behavior. Include approaches for involving the public in SWMP development and implementation.	i. For each key target audience, select a minimum of one outreach strategy listed below. At least two outreach strategies must be active. **Passive Outreach Strategies:** • Advertisements • Brochures/ Fliers • Business Specific Emails • Community Artwork/ Murals • Educational Signage • Informative Articles or Stories • Social Media • Sponsorship of Community Events • Targeted Door Hangers • Utility Bill Inserts • Vehicle Wraps **Active Outreach Strategies:** • Cleanup Days/ Events • Community Meetings/ Presentation • Community Storm Water Surveys

	• Form a Citizen Storm Water Advisory Panel • Host AmeriCorps Member • Industry Specific Training • Participation in Community Events • Pet Waste Stations • Public Tours • Public Workshops • Rain Garden Adoption/ Building Program • Storm Drain Adoption Program • Student Outreach/ Class Work • Water Quality Monitoring with Citizen Volunteers Note: DEQ may approve or require additional outreach strategies. ii. Each year, the permittee must implement at least four activities. The activities can be the same or different from year to year. For each key target audience, identify the outreach strategies and planned timeframe for implementation for the upcoming year and include this information in the annual report.
d. Distribute and/or perform outreach to target audiences and track performance/ public involvement.	i. Implement the identified outreach strategies (from Part II.A.1.c.i., above) for each key target audience. ii. For each key target audience and their associated outreach strategy, document participation and feedback using one or more of the performance tracking methods listed below: **Performance Tracking Methods:** • Community Surveys • Illicit Discharge Events • Percent of Population Reached • Performance Audits • Total Distribution • Total Event Participants • Total Weight Collected • Website Analytics Note: DEQ may approve or require additional performance tracking methods. iii. Maintain records on selected key target audiences, outreach strategies, and performance tracking methods. Use the resulting information and/or measurements to direct education and outreach resources most effectively and document modifications in the SWMP.

<table>
<tr><th>Minimum Measure</th><th>Required BMP</th></tr>
<tr><td colspan="2">2. MCM 3: Illicit Discharge Detection and Elimination
• Develop, implement, and enforce a program to detect and eliminate illicit discharges into the small MS4.
• Develop and annually update a storm sewer system map showing the location of all outfalls and the names/locations of all receiving waters.
• Through ordinance or other regulatory mechanism to the extent allowable under state or local law, effectively prohibit non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions.
• Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the MS4.
• Inform employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.</td></tr>
<tr><td>a. Identify categories of non-storm water discharges or flows that are significant contributors of pollutants to the MS4.</td><td>i. Determine which potential non-storm water discharges or flows to the Small MS4, including but not limited to a consideration of those listed below, are significant contributors of pollutants.
Non-Storm Water Discharges or Flows:
• Water Line Flushing
• Landscape Irrigation
• Diverted Stream Flows
• Rising Ground water
• Uncontaminated Ground water Infiltration
• Uncontaminated Pumped Ground water
• Discharges from Potable Water Sources
• Foundation Drains
• Air Conditioning Condensation
• Irrigation Water
• Springs
• Water from Crawl Space Pumps
• Footing Drains
• Lawn Watering
• Individual Residential Car Washing
• Flows from Riparian Habitats and Wetlands
• Dechlorinated Swimming Pool Discharges
• Street Wash Water
Note: Discharges or flows from firefighting activities are excluded from the effective prohibition against non-storm water and only need to be addressed where they are identified as significant sources of pollutants to surface waters.</td></tr>
</table>

	ii. In the SWMP, document and update annually: • A list of potential non-storm water discharges the permittee has identified as significant contributors of pollutants (i.e., illicit discharges). Include the pollutants associated with each illicit discharge, and any local controls or conditions placed on these discharges. • A list of potential non-storm water discharges the permittee has determined as non-significant contributors of pollutants and will not be addressed as illicit discharges, based on the information available to the permittee. Include the pollutants associated with each type of discharge and any local controls or conditions placed on these discharges.
b. Inventory storm water sewer infrastructure to track illicit discharges, contain spills, and determine high priority areas.	i. Annually review and update a map of the MS4's storm drainage system to accommodate the provisions of a comprehensive Illicit Discharge Detection and Elimination (IDDE) program and SWMP including, but not limited to, the following: • Outfall locations • Inlets • Open channels • Subsurface conduits/pipes • Dry wells (discharges to ground water directly) • Manholes • Other similar discrete conveyances • Surface waters that receive discharges from outfalls ii. Using inspection and screening results, storm sewer maps, and other appropriate data, list, label, or highlight determined high priority outfalls. When determining high priority outfalls, permittees must consider, at a minimum, the following: • Industrial areas • Areas with previous illicit discharges • Known illegal dumping areas • Oldest portions of storm sewer infrastructure • Areas with onsite sewage disposal systems • Areas discharging to an impaired water body The permittee must identify a minimum number of high priority outfalls not equaling zero, based on the knowledge of potential illicit discharges in their MS4. High priority outfalls shall be reviewed and updated annually. iii. Update the map annually and make available for review by the Department upon request.

c. Develop/update an Illicit Discharge Investigation and Corrective Action Plan to consistently and effectively investigate suspected illicit discharges and connections and track subsequent compliance actions.	i. Maintain and annually update an Illicit Discharge Investigation and Corrective Action Plan. The plan should describe the processes that will be used to locate the source of an illicit discharge and refer to the permittee's Enforcement Response Plan (in Part II.A.2.d.i, below) for execution of appropriate enforcement actions. At a minimum, this plan shall include processes to: • Investigate a suspected illicit discharge within seven calendar days. Document circumstances that prevent this timeframe. • Prioritize illicit discharges suspected of being sanitary sewage and/or significantly contaminated for investigation first. • Confirmed illicit discharges must be eliminated within a timeframe of six months from the date of discovery. Where applicable, document circumstances that prevent this timeframe. • Notify Montana DEQ and appropriate agencies of illicit discharges believed to be an immediate threat to human health or the environment. • Document that a good faith effort was made to find the source of the illicit discharge and document each phase of the investigation in a case file. • Resolve and document the conclusion of all investigations. The outfall where any illicit discharge is detected shall continue to be considered high priority and should be investigated as required in this permit. If further investigation and corrective action results show the incident was isolated, with no indication of habitual illicit discharge, the outfall may be removed from the high priority list during annual review, as required in section II.A.2.b.ii., above. ii. Implement the Illicit Discharge Investigation and Corrective Action Plan. When an illicit discharge is identified, the permittee must cease, or require the cessation of, the discharge within a timeframe of six months. After the illicit discharge has been eliminated, the permittee must also minimize surface contamination by removing, or requiring the removal of, surface residue or other types of pollutant sources. iii. Maintain documentation which describes investigations conducted and corrective actions taken per the Illicit Discharge Investigation and Corrective Action Plan. Submit a summary with each annual report.
d. Through ordinance or other regulatory mechanism to the extent allowable under state or local law, effectively prohibit discharge of non-storm water into the regulated storm sewer system and implement	i. Maintain, update, and implement a formal Enforcement Response Plan (ERP) for illicit discharges. At a minimum, the ERP must describe or identify the following: • Legal authority (through ordinance, formal policies, or memoranda of understanding) to eliminate and abate illicit discharges • Staff with enforcement authority • Enforcement actions available • An enforcement escalation process

appropriate enforcement procedures and actions.	• A schedule utilized to quickly and consistently eliminate the source of the discharge, abate any damages, and reduce the chance of reoccurrence. To the extent allowable under local and state law, the ERP must include informal, formal, and judicial responses, such as the following: **Informal:** • Telephone Notification • Verbal/Written Notice • Meetings **Formal:** • Administrative Order • Compliance Schedule • Order to Show Cause • Monetary Penalty (administrative) • Suspended Service • Notice of Violation (NOV) **Judicial:** • Injunctive Relief • Consent Decree • Civil Penalties • Criminal Penalties ii. Permittees with legal authority must adopt an ordinance or other regulatory mechanism to prohibit illicit discharges, which shall include a provision prohibiting any occasional incidental non-storm water discharge event that is determined to be contributing significant amounts of pollutants to the Small MS4. Review the ordinance or regulatory mechanism once per permit cycle and update as needed. Permittees without legal authority to enact an ordinance or other regulatory mechanism to prohibit illicit discharges must develop and implement written policies and procedures to exert authority (to the extent allowable) over MS4 users, such as employees, the traveling public, contractors, etc… Review these written policies and procedures once per permit cycle and update as needed. iii. Solicit assistance from neighboring MS4s, as necessary, to detect and eliminate illicit discharges that may originate within the neighboring MS4 and formalize in cooperative agreements (i.e. memoranda of understanding). Agreements shall specify investigation and enforcement responsibilities and shall be

	described in each permittee's ERP and Illicit Discharge Investigation and Corrective Action Plan. Formalize cooperative agreements with all neighboring MS4s, as necessary, to implement the IDDE program.
e. Inspect all outfalls during dry weather to detect illicit discharges and connections into the MS4.	i. Inspect and screen **all** the permittee's outfalls during dry weather using the outfall field screening protocol developed by the *Center for Watershed Protection,* or an equivalent process. Using the protocol, if illicit discharge potential is determined, the permittee shall use the procedures identified above for tracing and removing an illicit discharge. **This process shall be completed by the end of the permit cycle.** ii. Inspect and screen identified **high priority** outfalls (from II.A.2.b.ii, above) during dry weather **a minimum of once per year** and submit a summary of screening results with each annual report.

Minimum Measure	Required BMP
3. MCM 4: Construction Site Storm Water Management • Develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre, including activities that are part of a larger common plan of development or sale that would disturb one acre or more. • Develop and implement, at a minimum, the following: o An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under state and local law; o Requirements for site operators to implement appropriate erosion and sediment control BMPs, and to control waste; o Procedures for site plan reviews that incorporate consideration of potential water quality impacts; o Procedures for receipt and consideration of information submitted by the public; and o Procedures for site inspection and enforcement control measures.	
a. Require that all regulated construction projects within the Small MS4 submit a construction storm water management plan (site plan) prior to construction. The plan shall be consistent with state and local requirements and incorporate consideration of potential water quality impacts including storm water pollution prevention through appropriate erosion, sediment, and waste control BMPs. A storm	i. **Traditional MS4s:** Update and implement a construction storm water management plan review checklist that documents, at a minimum, the requirements described in the Technology-Based Effluent Limitations of the most current MPDES Storm Water Construction GP for all regulated construction projects. The checklist shall be used to ensure consistent review of submitted plans and to determine and document compliance with state and local requirements. **Non-traditional MS4s:** Update and implement a construction storm water management plan review checklist that documents, at a minimum, the requirements described in the Technology-Based Effluent Limitations of the most current MPDES Storm Water Construction GP for all permittee-owned/operated project site plans. The permittee may modify the plan review checklist based on the maximum extent of contractual agreements with documentation. The checklist shall be used to ensure consistent review of submitted plans and to determine and document compliance with state and local requirements.

water pollution prevention plan (SWPPP) developed pursuant to the MPDES General Permit, MTR100000 for Storm Water Discharges Associated with Construction Activity (MPDES Storm Water Construction GP), may substitute for this site plan.	
b. Ensure that all construction storm water management controls are installed, operated, and maintained to function as designed.	i. **Traditional MS4s:** Update and implement a site inspection form or checklist to complete consistent and thorough regulated project inspections for all regulated construction projects. The checklist shall include, at a minimum, the requirements described in the Technology-Based Effluent Limitations of the most current MPDES Storm Water Construction GP. **Non-traditional MS4s:** Update and implement a site inspection form or checklist to complete consistent and thorough regulated project inspections for all permittee-owned/operated project sites. The checklist shall include, at a minimum, the requirements described in the Technology-Based Effluent Limitations of the most current MPDES Storm Water Construction GP. The permittee may modify the plan review checklist based on the maximum extent of contractual agreements with documentation. ii. Maintain a regulated project inventory to include, at minimum, the following: • If the project is covered under the most current MPDES Storm Water Construction GP and if so, the associated authorization number • The location, size, and topography of the site • The proximity of the site to waterbodies for each project iii. Utilize a protocol to determine the priority and minimum routine inspection frequency of construction storm water management controls. Priority is to be determined using, at a minimum, the following criteria: • Project size • Proximity to a water body • Steepness of the project site slopes • Discharge to waterbodies impaired for pollutants expected from construction projects

	• Past record of non-compliance by the operator of the construction site The protocol shall establish the following minimum routine inspection frequency for all determined high priority projects: • Once at commencement of construction after BMPs have been implemented • Once within 48 hours after each rain event of 0.25 inches or greater • Once within 48 hours after each occurrence of runoff from snowmelt due to thawing conditions that cause visible surface erosion at the site • Once at the conclusion of the project prior to finalization (i.e. release of bond, issuance of certificate of occupancy, etc.) In addition, the protocol shall include recidivism reduction and corrective measures at non-compliant sites, such as processes for: • Additional on-site visits; • Increased inspection frequency; • Written notice of violations; • Stop work orders; and • Advancement to enforcement via the ERP process, as discussed below in II.A.3.c.iii. iv. The permittee must annually identify and inspect a minimum number of projects not equaling zero. Conduct and document inspections using the inspection form and determined routine inspection frequency protocol. If a routine inspection identifies non-compliance, or a failure to implement appropriate control measures that cannot be corrected at the time of initial inspection, the permittee must verify and confirm issues have been corrected within 14 days of documentation of non-compliance. If the illicit discharge has not ceased after 14 days, or control measures are still inadequate, the permittee must advance the non-compliant site through the established ERP process (II.A.3.c.iii).
c. Through ordinance or other regulatory mechanism to the extent allowable under state and local law, effectively require controls of construction-related pollutants (such as sediment and erosion)	i. **Traditional MS4s:** Adopt and implement an ordinance or other mechanism to require construction storm water controls on private and permittee-owned regulated projects. At a minimum, the regulatory mechanism must: • Require the construction storm water management minimum standards (described as Technology-Based Effluent Limitations in the most current MPDES Storm Water Construction GP) to be implemented on all regulated construction projects. • Provide the permittee the authority to inspect privately-owned construction storm water management controls.

on regulated construction projects and implement appropriate enforcement procedures/actions.	ii. **Non-traditional MS4s:** At a minimum, adopt and implement formal policies or other mechanisms to the extent allowable (such as contractual requirements applicable to contractors performing construction work) on permittee-owned/operated projects. The permittee must consider and document private development projects regardless of legal authority. At a minimum, the regulatory mechanism must require the construction storm water management minimum standards (described as Non-Numeric Technology-Based Effluent Limits in the most current MPDES Storm Water Construction GP) to be implemented on all regulated construction projects. iii. The Enforcement Response Plan (ERP) developed in II.A.2.d.i. shall be implemented and maintained to ensure compliance with construction storm water management regulatory mechanisms on regulated projects including private property. The ERP must include informal, formal, and judicial responses (as listed in II.A.2.d.i.). Additionally, the ERP shall include sanctions and enforcement mechanisms to achieve compliance and must describe or identify, at a minimum, the following: • How the permittee will eliminate and abate illegal construction discharges • Staff with enforcement authority • Enforcement actions available • Enforcement escalation processes including a schedule to quickly and consistently eliminate the source of the discharge • How the permittee will facilitate abatement of the damages and reduce the chance of reoccurrence In addition, the ERP must also include non-monetary construction project-specific penalties such as stop work orders, bonding requirements, and/or permit denials for non-compliance. Review the written ERP once per permit cycle and document updates in the SWMP, as needed.

Minimum Measure	Required BMP
4. MCM 5: Post-Construction Site Storm Water Management • Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale. Ensure that controls are in place to prevent or minimize water quality impacts. • Develop and implement strategies that include a combination of structural and non-structural BMPs appropriate for the community. • Develop and implement an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under state or local law. • Ensure adequate long-term operation and maintenance of post-construction BMPs.	
a. Require that all regulated development projects submit a site plan consistent with state and local post-construction requirements, which incorporates consideration of potential water quality impacts including appropriate post-construction storm water management controls.	i. **Traditional MS4s:** Update and implement a plan review checklist to ensure consistent review of submitted plans and to determine and document compliance with state and local post-construction requirements. **Non-traditional MS4s:** Update and implement a plan review checklist to ensure consistent review of plans for permittee-owned/operated projects and to determine and document compliance with state and local post-construction requirements. The permittee may modify the plan review checklist based on the maximum extent of contractual agreements with documentation. ii. Require that all regulated projects implement post-construction storm water management controls that are designed to infiltrate, evapotranspire, and/or capture for reuse the post-construction runoff generated from the first 0.5 inches of rainfall from a 24-hour storm preceded by 48 hours of no measurable precipitation (runoff reduction requirement). For projects that cannot meet 100% of the runoff reduction requirement, the remainder of the runoff from the first 0.5 inches of rainfall must be either: • Treated onsite using post-construction storm water management controls expected to remove 80 percent total suspended solids (TSS); • Managed offsite within the same sub-watershed using post-construction storm water management controls that are designed to infiltrate, evapotranspire, and/or capture for reuse; or • Treated offsite within the same sub-watershed using post-construction storm water management controls expected to remove 80 percent total suspended solids (TSS) Permittees allowing offsite treatment shall do the following: • Develop and apply criteria for determining the circumstances under which offsite treatment may be allowed. The criteria must be based on multiple factors, including but not limited to technical or logistic infeasibility, such as:

	• Lack of available space • High ground water • Ground water contamination • Poorly infiltrating soils • Shallow bedrock • Prohibitive costs • A land use that is inconsistent with capture and reuse or infiltration of storm water Determinations may not be based solely on the difficulty and/or cost of implementation. The permittee must develop a formal review and approval process for determining projects eligible for offsite treatment. The offsite treatment option is to be used only after available onsite options have been evaluated and documented through the permittee's developed formal review and approval process. • Maintain an inventory of regulated projects which utilize offsite treatment for post-construction storm water runoff. The inventory must include the following information for each approved project: • Geographic location of the project • Location of offsite treatment • Documentation of the rationale for approval of offsite treatment
b. Ensure that all post-construction storm water management controls are installed, operated, and maintained to function as designed.	i. **Traditional MS4s:** Update and implement an inspection form or checklist to ensure consistent and thorough inspections of post-construction storm water management controls. **Non-traditional MS4s:** Update and implement an inspection form or checklist to ensure consistent and thorough inspections of post-construction storm water management controls. The permittee may modify the inspection form or checklist based on the maximum extent of contractual agreements with documentation. ii. Maintain an inventory (including at a minimum, a description and location) of all **new** permittee-owned and private post-construction storm water management controls installed since the effective date of this permit. iii. **Traditional MS4s:** Maintain an inventory (including at minimum, a description and location) of all **existing** permittee-owned and private high priority post-construction storm water management controls installed prior to the effective date of this permit. **Non-traditional MS4s:** Maintain an inventory (including a description and location) of all **existing** permittee-owned post-construction storm water management controls. iv. Utilize a protocol to determine the priority and minimum routine inspection frequency of post-construction storm water management controls. Priority must be determined based on potential water quality impacts using specific criteria, which at a minimum shall include:

	• Operation and maintenance needs of the practices • Proximity to water body • Drainage area treated • Land use type • Location within an impaired waterbody watershed The permittee must annually identify a minimum number of projects for inspection not equaling zero. v. Inspect all **permittee-owned** high priority post-construction storm water management controls annually and document findings and resulting compliance actions. vi. **Traditional MS4s:** Develop a program to either conduct inspections of private high priority post-construction storm water management controls, or to require self-inspection and reporting by owners. Inspect or have inspected all high priority privately-owned post-construction storm water management controls annually. Document findings and resulting compliance actions.
c. To the extent allowable under state or local law, effectively require, through ordinance, or other regulatory mechanism, post-construction storm water management controls on regulated projects and implement appropriate enforcement procedures and actions.	**Traditional MS4s:** Adopt and implement an ordinance or other regulatory mechanism to require post-construction storm water management controls on regulated projects that, at a minimum, include the performance standard described in Part II.A.4.a.ii, above. Review the ordinance or regulatory mechanism once per permit cycle and update as needed. **Non-traditional MS4s:** At a minimum, adopt and implement formal policies or other mechanisms to the extent allowable (such as contractual requirements applicable to contractors performing construction work) requiring post-construction storm water controls on permittee-owned/operated projects. The permittee must consider and document private development projects regardless of legal authority. Review these written policies and procedures once per permit cycle and update as needed. iv. The ERP developed in II.A.2.d.i. shall be implemented and maintained to ensure compliance with installation, operation, and maintenance requirements for post-construction storm water management controls on regulated projects including private property. The ERP must include informal, formal, and judicial responses (as listed in II.A.2.d.i.). Additionally, at a minimum, the ERP must describe or identify the following: • Legal authority to require inspection and maintenance of post-construction storm water management controls • Staff with enforcement authority • Enforcement actions available • An enforcement escalation processes

	• A schedule to be utilized to quickly and consistently enforce compliance with post-construction requirements.
d. Incorporate recommendations and requirements into plans, policies, and ordinances which allow and support the utilization of LID (low impact development) concepts and green infrastructure on public and private property.	i. Assess and document existing ordinances, policies, programs, and studies to identify whether the following LID concepts (both structural and non-structural BMPs) have been implemented to promote protection of storm water runoff quality associated with new and redevelopment projects: • Directing growth to identified areas • Protecting sensitive areas such as wetlands and riparian areas • Maintaining and/or increasing open space • Providing buffers along sensitive water bodies • Minimizing impervious surfaces • Minimizing disturbance of soils and vegetation ii. By the end of the third year of the permit cycle, develop and submit a plan outlining any needed modifications to relevant codes, ordinances, policies, and programs to implement LID/green infrastructure concepts. The plan shall include, but is not limited to, the preventative actions identified above that have not yet been implemented and proposed timelines for any needed code, ordinance, policy or programmatic updates. If modifications to codes, ordinances, policies, or programs are not needed, submit a plan/overview of any work scheduled or completed to implement LID/green infrastructure concepts, such as those listed above.

Minimum Measure	Required BMP
5. MCM 6: Pollution Prevention and Good Housekeeping Develop and implement an operation and maintenance program that includes a training component and has the goal of preventing or reducing pollutant runoff from municipal operations. The program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.	
a. Implement an operation and maintenance program to prevent or reduce pollutant runoff from permittee-owned/operated facilities and field activities.	i. Maintain a written inventory of permittee-owned/ operated facilities and activities that have the potential to contribute contaminants to the MS4. The inventory should include, at a minimum, the following: **Facilities:** • Maintenance and storage yards • Waste handling and disposal areas • Vehicle fleet or maintenance shops with outdoor storage areas • Salt/sand storage locations • Snow or dredge material disposal areas operated by the permittee **Activities:** • Park and open space maintenance • Parking lot maintenance • Building maintenance • Road maintenance/deicing • Storm water system maintenance including catch basin cleaning Organize facilities/activities into labeled categories and list the possible contaminants from each. List the local department(s) and position(s) responsible for pollution prevention of each facility/activity. Update the inventory annually. ii. For each category established, maintain written standard operating procedures (SOPs) aimed at preventing or reducing pollutant contributions from municipal operations. Each SOP must contain, at a minimum, the following: • Identified storm water pollution controls (structural and non-structural controls, and operation improvements) installed, implemented, and/or maintained to minimize the discharge of contaminants. • Inspection procedures for facilities and their structural storm water controls, which at a minimum must include:

	o An annual visual inspection of each applicable facility. o A verification that the written facility procedures, documentation, and site map are current. o Visual observation of locations and areas where storm water from facilities is discharged off-site, to state waters, or to a storm sewer system that drains to state waters. o Visual observation of facility conditions, including pollutant sources and control measures, to identify control measures that are inadequate or needing maintenance. All inadequate control measures shall be modified or replaced as soon as possible, but no later than six months from visual inspection. If a control measure cannot be modified or replaced within the six-month timeframe due to infeasibility (such as financial burden or time commitment of capital improvement projects), the permittee will provide a written explanation and a schedule for improvement with the following year's annual report. Document facility inspections and communication with relevant department personnel regarding inadequate control measures. Evaluate/update each SOP at least once over the term of this permit and submit any updates to SOPs with the annual report. iii. Maintain a map that identifies the locations of facilities and activities identified. Update the map annually. iv. Conduct storm water pollution prevention training in compliance with section II.B. (below) for all permittee staff directly involved with implementing SOPs. Retain records of completed trainings and attendance.

B. Training

The permittee is required to conduct and/or coordinate, at a minimum, the following trainings and document applicable personnel participation. All new hires that fall into the categories below (section II.B.1-4) with potential to impact storm water pollutant contributions must receive the equivalent amount of the following training within 90 days of their hire date.

1. Storm Water Management Team

1st Year of Permit Term: Conduct comprehensive training for all members of the storm water management team to educate them about permit updates and implementation responsibilities for the upcoming permit term.

2. Construction Site Personnel

At a minimum of once during the permit term, conduct Construction Site Storm Water Pollution Prevention Plan (SWPPP) training for personnel, including inspectors and plan reviewers, responsible for the implementation of the Construction Site Storm Water Management Minimum Measure (MCM 4). Training shall include, at a minimum, inspection protocol and implementation of the MS4's ERP.

3. Post-Construction Site Personnel

At a minimum of once during the permit term, conduct plan review and stormwater facility inspection training for all personnel responsible for the implementation of the Post-Construction Site Storm Water Management Minimum Measure (MCM 5). Inspector training shall include, at a minimum, inspection protocol and implementation of the MS4's ERP.

4. Field and Facility Personnel

1st and 4th years of Permit Term: Conduct field and facility training for MS4 personnel responsible for completing work activities with storm water pollution potential. This shall include any staff or field crews subject to oversight through SOPs as part of the Pollution Prevention and Good Housekeeping Minimum Measure (MCM 6). The training must provide, at a minimum, education regarding the following:

- An overview of this permit and the requirements contained herein.
- Potential storm water impacts.
- The detection and elimination of illicit discharges.
- BMPs necessary to minimize discharges of pollutants during permittee activities or the operation of permittee-owned facilities.
- Any SOP updates completed as a result of the required work under MCM 6.

C. Monitoring Requirements

1. Storm Event Monitoring

All permittees are required to perform sampling, testing, and reporting of storm water discharges for their small MS4s during a storm event with a measurable amount of discharge. The Department reserves the right to require additional storm water sampling, testing, and reporting on a case-by-case basis. All analytical procedures must comply with the specifications of 40 CFR Part 136. The required monitoring parameters are listed in Table 1, below.

Table 1. Self-Monitoring and Reporting Requirements			
Parameter	**Units**	**Frequency**	**Type [1]**
Estimated Flow	gpm	Semi-annual [3]	Instantaneous [2]
pH	s.u.		Instantaneous
Chemical Oxygen Demand (COD)	mg/L		Grab or Composite
Total Suspended Solids (TSS)	mg/L		Grab or Composite
Total Phosphorus	mg/L		Grab or Composite
Total Nitrogen	mg/L		Grab or Composite
Oil and Grease [4]	mg/L		Grab
Copper, Total Recoverable	µg/L		Grab or Composite
Lead, Total Recoverable	µg/L		Grab or Composite
Zinc, Total Recoverable	µg/L		Grab or Composite

[1] See definition section at the end of this permit for explanation of terms.
[2] Estimated flow rates are appropriate in cases where measurement gauges are not installed.
[3] Twice per year. One sample at each monitoring location must be taken between January 1st and June 30th of each permitted calendar year and the other sample between July 1st and December 31st.
[4] Hexanes extraction (EPA Method 1664A).

a. Storm Event Monitoring Locations

For each semi-annual monitoring period, MS4 permittees must sample within the permitted geographic area during a storm event with a measurable amount of discharge. Permittees will establish a network of at least four monitoring locations with at least one location representing a predominantly commercial and/or industrial area and at least one location representing a predominantly residential area. One monitoring location may be upstream, outside the MS4 boundary to evaluate water quality entering the MS4.

Monitoring locations must be consistently identified using a naming scheme of the permittee's choice, but the permittee can only use a chosen name once. The permittee may request, in writing, to replace a monitoring location outfall. If DEQ approves the request, the new outfall monitoring location must be identified with an unused outfall name/number. Replacement monitoring locations can only occur once per permit cycle for each outfall.

b. Storm Event Monitoring Frequency

Sampling must be conducted at least semi-annually (two times per year) for each of the parameters listed in Table 1 during a storm event with a measurable amount of discharge. One sample at each monitoring location must be taken between January 1st and June 30th of each permitted calendar year and the other sample between July 1st and December 31st.

If a permittee is not able to dependably obtain a sample at the identified required sampling outfall during a six-month monitoring period, rationale must be recorded in the corresponding annual report (discussed in II.E.1., below) on why the collection of a sample was impracticable. The permittee must collect a substitute sample during the subsequent six-month monitoring period in addition to the required sample. The substitute and required six-month sample may be collected from back-to-back storm events when there has been at least 48 hours of no measurable precipitation in between events.

2. Impaired Waterbody Monitoring

Permittees shall maintain an inventory of all outfalls that discharge to impaired waterbodies including the impaired waterbody name and associated pollutant(s) of impairment. Based on the status of an approved total maximum daily load (TMDL) described below, the permittee must target and reduce discharges to impaired waterbodies via implementation of BMPs and/or through additional TMDL-related monitoring. Information on impaired waterbodies may be obtained from DEQ or from the Clean Water Act Information Center website (http://cwaic.mt.gov/).

a. Pre-Total Maximum Daily Load

The permittee's SWMP shall include a section describing BMPs used to target and reduce discharges to impaired waterbodies **without** an approved TMDL for any identified pollutant(s) of impairment related to storm water. The permittee's annual report shall contain a summary of BMPs implemented over the reporting period and a schedule of BMPs planned for the following year.

b. Approved TMDL Wasteload Allocations (WLAs)

Appendix A of this permit contains a list of TMDLs with WLAs assigned to MS4s approved by the Department and EPA as of the effective date of this permit. Permittees must comply with all MS4-related requirements associated with the TMDLs. The permittee shall include in its SWMP a section identifying the measures and BMPs it plans to implement to address TMDL MS4-related requirements. This section shall describe the MS4's impairment priorities and long-term strategy in making progress towards meeting the TMDL. The long-term strategy must outline interim milestones (i.e., a completion schedule for action items) for controlling the discharge of the pollutants of concern. Based on TMDL monitoring results (discussed below), this section must be evaluated by the end of the third year of the permit cycle, revised as needed, and resubmitted with the following annual report (March 1, 2025). Rationale shall be provided for any revisions.

TMDL-Related Monitoring

The permittee must supplement the Storm Event Monitoring Requirements in Part II.C. with additional monitoring targeted at further evaluating MS4 loading to impaired waterbodies and evaluating the effectiveness of BMPs, as outlined below. The permittee's SWMP must include a TMDL-related monitoring sampling plan. The sampling plan shall address monitoring for storm water-related pollutant(s) listed as a source of impairment specific to the receiving waterbody and be collected following procedures in 40 CFR Part 136. Additionally, the plan shall include strategy rationale, monitoring frequency, and monitoring locations as outlined below. The permittee must re-submit a sampling plan to the Department for review and approval by the first annual report (due March 1, 2023).

Provide a minimum of one opportunity annually for the public to provide comments on the written sampling plan. This may be accomplished via the MS4's storm water website and in conjunction with the public comment requirements set forth in MCMs 1&2 (Part II.A.1.a.ii.). Document all relevant input, responses, and sampling plan modifications made as a result.

i. TMDL-Related Monitoring Locations

TMDL related monitoring allows for an MS4-specific strategy that will provide the data required to track and evaluate effectiveness of BMPs. At a minimum, select four sampling locations that discharge to impaired waterbodies. The same sample sites and sampling events may be used for both Storm Event Monitoring and TMDL Monitoring. When selecting the location of these outfalls, permittees should consider, at a minimum, the following:

- The largest drainage areas
- The surrounding land uses which could contribute to impairments
- High priority areas identified via the requirements in MCM 3: Illicit Discharge Detection and Elimination

Monitoring locations must be consistently identified using a naming scheme of the permittee's choice, but the permittee can only use a chosen name once. The permittee may request, in writing, to replace a monitoring location outfall. If DEQ approves the request, the new outfall monitoring location must be identified with an unused outfall name/number. Replacement monitoring locations can only occur once per permit cycle for each outfall.

ii. TMDL-Related Monitoring Frequency

Sampling must be conducted at least semi-annually (two times per year) for each of the storm water-related pollutant(s) listed as a source of impairment specific to the receiving waterbody.

D. Recording Requirements

1. Monitoring Records

The following information must be recorded and maintained at the office of the contact person/position for all monitoring samples:

- Date, exact place, and time of sampling
- Estimated duration (in hours) of the storm event(s) sampled
- Total rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff
- Name(s) of the individuals which performed the sampling or measurements
- Analytical laboratory test result data and reports for storm water samples, and/or records, which minimally indicate:
  - The date(s) analyses were performed
  - The time analyses were initiated
  - The initials or name(s) of individual(s) who performed the analyses
  - References and written procedures, when available, for the analytical techniques or methods used
  - The results of such analyses, including the bench sheets, instrument readouts, computer disks or tapes, etc. used to determine these results.

2. Retention of Records

The permittee shall retain records of all monitoring information for a period of at least five years from the date of sample, measurement, report, or application. Records shall include:

- Performed calibrations.
- Maintenance records
- Original strip chart recordings
- Copies of reports required by this General Permit
- Records of data used to complete the application for this General Permit

E. Reporting and Evaluation of the SWMP

1. Annual Report and SWMP Updates

The permittee shall prepare and submit an annual report to DEQ for each calendar year within the General Permit term starting March 1, 2023. The permittee shall electronically submit the signed copy of the annual report form (supplied by DEQ), all required attachments, and any additional requested information to the Department by March 1st of each year for the preceding calendar year. Co-permittees shall submit an annual report form pertaining to their respective permitted Small MS4(s) unless formal written shared responsibilities allow another entity to complete the annual report form obligations.

If the permittee or co-permittee has made any updates, changes, or improvements to their Storm Water Management Program during the prior calendar year, an attachment to the annual report must provide a date and description of these updates. Updates to the storm sewer map(s) should also be submitted electronically via GIS shapefiles, PDFs, or reference to available online maps. Updates or revisions to submitted documents shall be retained onsite with the last revision date, and documents must be available upon request.

III. SPECIAL CONDITIONS

A. Sharing Responsibility

A small MS4 may share responsibility to implement the minimum control measures with another entity to satisfy their MPDES permit obligations. Shared obligation must be in writing and maintained as part of the permittee's SWMP. In annual reports, the owners and operators of each MS4 must specify if they are relying on another entity to satisfy some, or any, of their permit obligations. Implementation of the control measure, or any component thereof, must be completed to a degree at least as stringent as the corresponding MPDES permit requirement.

Each individual MS4 remains responsible for compliance with its permit obligations if the other entity fails to implement the control measure, or any component thereof. Therefore, DEQ recommends MS4s with shared obligations enter into a legally binding agreement to minimize uncertainty about compliance with this MPDES permit.

B. Qualifying Local Program

If a qualifying local program (defined in ARM 17.30.1111(9)) requires a small MS4 to implement one or more of the six minimum control measures, the permittee is directed to follow that qualifying program's requirements rather than the applicable storm water management program requirements stated in Part II.A.

C. Ownership, Authority, or Responsibility for SWMP Implementation

The permittee must implement the SWMP on all new areas added to the permittee's portion of the Small MS4 (or for which the permittee becomes responsible for implementation of storm water quality controls) as expeditiously as possible. Within 90 days of transfer of ownership, operational authority, or responsibility for SWMP implementation, the permittee must have a plan for implementing the requirements of this General Permit on all newly added areas. The plan may include phases/schedules for implementation to allow for controls that cannot be implemented immediately. Information on all new annexed areas and any resulting updates to the SWMP must be included in the Annual Report.

D. Changes in Storm Water Coordinator

If the Storm Water Coordinator person/position, mailing address, email address, or telephone number identified on the application form change, the permittee shall notify the Department in writing within 15 calendar days of the change. Written notice must reference a "change of Storm Water Coordinator", identify the permit authorization number, identify the formal Small MS4 Name as identified on the application, and be signed by a person meeting the signatory requirements of Part IV.M., below.

E. Records for Inspection

A copy of the General Permit, permit authorization letter, required SWMP documents, annual reports, discharge monitoring reports (if required), and other pertinent records required by the General Permit shall be maintained by the Storm Water Coordinator and made available to Department inspectors upon request.

F. Twenty-four Hour Notice of Noncompliance or Illicit Discharge

The permittee shall report any serious incident of noncompliance or illicit discharge affecting the environment as soon as possible, but no later than twenty-four (24) hours from the time the permittee first became aware of the circumstances. The report shall be made to the Water Protection Bureau at (406) 444-5546 or the Office of Disaster and Emergency Services at (406) 324-4777. The following examples are considered serious incidents:

- Any noncompliance which may seriously endanger health or the environment.
- Any unanticipated bypass which exceeds any effluent limitation in the permit.
- Any upset which exceeds any effluent limitation in the permit.

Additionally, a written submission shall be provided within five days of the time that the permittee becomes aware of the circumstances. The written submission shall contain:

- A description of the noncompliance/illicit discharge and its cause/origin.
- The period of noncompliance/illicit discharge, including exact dates and times.
- The estimated time for correction if it has not been corrected already.

DEQ may waive the written report on a case-by-case basis if the oral report has been received within 24 hours by the Water Protection Bureau, by phone, (406) 444-5546. Reports shall be submitted to the following address: DEQ Water Protection Bureau, PO Box 200901, Helena, MT 59620.

IV. STANDARD CONDITIONS

A. Duty to Comply

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Montana Water Quality Act and is grounds for enforcement action, for termination under the General Permit, or for denial of coverage under this General Permit renewal. The permittee shall give the Department advance notice of any planned changes at the permitted facility or of an activity which may result in permit noncompliance.

B. Penalties for Violations of Permit Conditions

The Montana Water Quality Act provides that any person who violates a permit condition of the Act is subject to civil or criminal penalties not to exceed $25,000 per day or one year in prison, or both, for the first conviction, and $50,000 per day of violation or by imprisonment for not more than two years, or both, for subsequent convictions. MCA 75-5-611(a) also provides for administrative penalties not to exceed $10,000 for each day of violation and up to a maximum not to exceed $100,000 for any related series of violations.

C. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The reapplication must be submitted at least 30 days before the expiration date of this permit.

D. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

E. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

F. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also include adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

G. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

H. Property Rights

The issuance of this permit does not convey any property or water rights of any sort, or any exclusive privileges.

I. Duty to Provide Information

The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

J. Inspection and Entry

Upon the presentation of credentials and other documents as may be required by law, the permittee shall allow the head of DEQ, the Regional Administrator, or any authorized representative, at reasonable times, to:

- Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- Have access to and copy any records that must be kept under the conditions of this permit;
- Inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- Sample or monitor for any substance or parameters at any location for the purpose of assuring permit compliance.

K. Availability of Reports

Except for data determined to be confidential under 40 CFR Part 2, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Department. As required by the Clean Water Act, applications, permits and effluent data shall not be considered confidential.

L. Penalties for Falsification and Tampering

The Montana Water Quality Act provides that any person who knowingly falsifies, tampers with, or renders inaccurate any monitoring device or method, or makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction be punished by a fine of not more than $25,000 per violation, or by imprisonment for not more than six months per violation, or by both.

M. Signatory Requirements

All applications, reports or information submitted to the Department or EPA shall be signed and certified. All permit notices of intent shall be signed by either a principal executive officer or ranking elected official. All reports required by the permit and other information requested by the Department shall be signed by a person described above or by a duly authorized representative of that person. A person is considered a duly authorized representative only if:

- The authorization is made in writing by a person described above and submitted to the Department; and

- The authorization specified either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or an individual occupying a named position.)

If an authorization described above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the above requirements must be submitted to the Department prior to or together with any reports, information, or applications to be signed by an authorized representative.

Any person signing a document under this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

N. Planned Changes

The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required only when the alteration or addition could significantly change the nature or increase the quantity of pollutant discharged. This notification applies to pollutants which are not subject to effluent limitations in the permit.

O. Anticipated Noncompliance

The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

P. Transfers

This permit is not transferable to a new permittee. A new owner or operator of a facility must apply according to the standard application procedures 30 days prior to taking responsibility for the facility.

Q. Other Information

When the permittee becomes aware that it failed to submit any relevant facts in an application, or submitted incorrect information in an application or any report to the Department, it shall promptly submit such facts or information with a narrative explanation of the circumstances of the omission or incorrect submittal and why they weren't supplied earlier.

R. Fees

The permittee is required to submit payment of an annual fee as set forth in ARM 17.30.201. If the permittee fails to pay the annual fee within 90 days after the due date for the payment, the Department may:

- Impose an additional assessment computed at the rate established under ARM 17.30.201: and,
- Suspend the processing of the application for a permit or authorization or, if the nonpayment involves an annual permit fee, suspend the permit, certificate or authorization for which the fee is required. The Department may lift suspension at any time up to one year after the suspension occurs if the holder has paid all outstanding fees, including all penalties, assessments and interest imposed under this sub-section. Suspensions are limited to one year, after which the permit will be terminated.

S. Removed Substances

Collected screenings, grit, solids, sludges, or other pollutants removed during treatment shall be disposed of in such a manner so as to prevent any pollutant from entering any waters of the state or creating a health hazard.

T. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Clean Water Act.

U. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

V. Reopener Provisions

This permit may be reopened and modified (following proper administrative procedures) to include the appropriate effluent limitations (and compliance schedule, if necessary), or other appropriate requirements if one or more of the following events occurs:

- Water Quality Standards: The water quality standards of the receiving water(s) to which the permittee discharges are modified in such a manner as to require different permit conditions than contained in this permit.
- Water Quality Standards are Exceeded: If it is found that water quality standards or trigger values in the receiving stream are exceeded either for parameters included in the permit or others, the Department may modify the permit conditions or water management plan.
- TMDL or Wasteload Allocation: TMDL requirements or a wasteload allocation is developed and approved by the Department and/or EPA for incorporation in this permit.
- Water Quality Management Plan: A revision to the current water quality management plan is approved and adopted which calls for different effluent limitations than contained in this permit.

W. Toxic Pollutants

A toxic standard or prohibition is established under Section 307(a) of the Clean Water Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit.

V. DEFINITIONS

The following definitions and abbreviations apply to terms used in this permit:

The **"Act"** means the Federal Clean Water Act.

"BMPs" is an acronym for **"Best Management Practices"** and means schedule of activities, prohibition of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of state waters. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

"Control measure" as used in this General Permit, means any Best Management Practice or other method used to prevent or reduce the discharge of pollutants to state waters.

The **"Department"** and **"DEQ"** means the Montana Department of Environmental Quality.

"Flow-weighted composite sample" means a composite sample consisting of a mixture of aliquots collected at a constant time interval, where the volume of each aliquot is proportional to the flow rate of the discharge.

"Grab Sample" for monitoring requirements, is defined as a single "dip and take" sample collected at a representative point in the discharge stream.

"Green Infrastructure" means vegetation, soils, and natural processes used to manage water and create healthier urban environments. At the scale of a city or county, green infrastructure refers to the patchwork of natural areas that provides habitat, flood protection, cleaner air, and cleaner water. At the scale of a neighborhood or site, green infrastructure refers to storm water management systems that mimic nature by soaking up and storing water.

"Hazardous substance" means any substance designated under 40 CFR Part 116 pursuant to section 311 of the federal Clean Water Act.

"Illicit Connection" means any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

"Illicit discharge" means any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to an MPDES permit (other than the MPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from firefighting activities.

"MEP" is an acronym for **"Maximum Extent Practicable",** the technology-based discharge standard for Municipal Separate Storm Sewer Systems to reduce pollutants in storm water discharges that was established by the Clean Water Act, Section 402(p). A discussion of MEP as it applies to Small MS4s is found in ARM 17.30.1111(5). The MEP standard requires the development, implementation, and enforcement of measures including BMPs, control techniques, system design, engineering methods, and other provisions that the Department determines to be appropriate for the control of such pollutants. MEP is an iterative, dynamic, flexible standard that the permittee shall evaluate and update continuously, as necessary, to better tailor or expand the program based on its effectiveness in reducing pollutant discharge load.

"MS4" means a municipal separate storm sewer system.

"Municipal separate storm sewer" means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that discharges to surface waters and is: (a) owned or operated by the state of Montana, a governmental subdivision of the state, a district, association, or other public body created by or pursuant to Montana law, including special districts such as sewer districts, flood control districts, drainage districts and similar entities, and designated and approved management agencies under section 208 of the federal Clean Water Act, which has jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, and is:

- designed or used for collecting or conveying storm water;
- not a combined sewer; and
- not part of a publicly owned treatment works (POTW) as defined in ARM Title 17, chapter 30, subchapter 13.

"Non-Traditional MS4" means MS4s which are designated as Small MS4s but are not cities or counties, such as drainage districts, transportation agencies, municipal utility districts, military bases, prisons and universities.

"Outfall" means a physical location where conveyance structures discharge pollutants of storm water into surface water or where they leave the boundary of the designated MS4. The term does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances that connect segments of the same stream or other surface waters and that are used to convey surface waters.

"Owner or operator" means a person who owns, leases, operates, controls, or supervises a point source.

"Point Source" means any discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft, from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural storm water runoff.

"Process wastewater" means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.

"Small municipal separate storm sewer system" means:

a. small MS4s, and portions of them, that are located in the following urbanized areas in Montana as determined by the latest decennial census by the United States census bureau:
    i. the city of Billings and Yellowstone County;
    ii. the city of Missoula and Missoula County; and
    iii. the city of Great Falls and Cascade County;

b. the following small MS4s serving a population of at least 10,000 as determined by the latest decennial census by the United States census bureau and that are located outside of an urbanized area:

    i. MS4s located in the city of Bozeman;
    ii. MS4s located in the city of Butte;
    iii. MS4s located in the city of Helena; and
    iv. MS4s located in the city of Kalispell;

c. MS4s designated by the department pursuant to 17.30.1107; and

d. systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large educational, hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

"Small MS4" means a small municipal separate storm sewer system.

"State waters" is defined at 75-5-103, MCA.

"Storm Water" means storm water runoff, snow melt runoff, and surface runoff and drainage.

"Storm Water Management Program" or **"SWMP"** means a comprehensive program to manage the quality of storm water discharged from the Small municipal separate storm sewer system.

"Surface waters" means any waters on the earth's surface including, but not limited to, streams, lakes, ponds, and reservoirs, and irrigation and drainage systems discharging directly into a stream, lake, pond, reservoir, or other surface water. Water bodies used solely for treating, transporting, or impounding pollutants shall not be considered surface water.

"Time-weighted composite sample" means a composite sample consisting of a mixture of equal volume aliquots collected at a constant time interval.

"Total Maximum Daily Load" or **"TMDL"** is defined at 75-5-103, MCA.

“Traditional MS4” means all cities and counties covered by this General Permit.

"Waste Load Allocation" or **"WLA"** means the portion of a receiving water's loading capacity that is allocated to one of its existing or future point sources.

APPENDIX A: MS4-RELATED TMDLs WITH APPROVED WLAs

MS4-related TMDLS and approved WLAs are summarized below. For full requirements and information, please review the documents in their entirety at the listed web addresses.

CITY OF HELENA

Name of TMDL: Framework Water Quality Restoration Plan and Total Maximum Daily Loads (TMDLs) for the Lake Helena Watershed Planning Area: Volume II – Final Report (August 2006); http://deq.mt.gov/Portals/112/Water/WQPB/CWAIC/TMDL/M09-TMDL-02a.pdf

Pollutants of Concern: Total Phosphorus, Total Nitrogen, Total Suspended Solids

MS4 WLA: None specified

Assumptions and Actions: To meet the intent of the TMDL goals and future recommendations, Helena must follow their permit requirements, evaluate potential impacts to impaired receiving waters, and utilize monitoring to implement an adaptive management approach to minimize pollutant loads.

CITY OF GREAT FALLS

Name of TMDL: Water Quality Restoration Plan and Total Maximum Daily Loads for the Sun River Planning Area (December 2004); http://deq.mt.gov/Portals/112/Water/WQPB/CWAIC/TMDL/M13-TMDL-01a.pdf

Pollutants of Concern: Total Phosphorus, Total Nitrogen, and Sediment

MS4 WLA: None specified

Assumptions and Actions: To meet the intent of the TMDL goals and future recommendations, Great Falls must follow their permit requirements, evaluate potential impacts to impaired receiving waters, and utilize monitoring to implement an adaptive management approach to minimize pollutant loads.

CITY OF BOZEMAN and MONTANA STATE UNIVERSITY-BOZEMAN

Name and Date of TMDL: Lower Gallatin Planning Area TMDLs & Framework Water Quality Improvement Plan (March 2013); http://deq.mt.gov/Portals/112/Water/WQPB/CWAIC/TMDL/M05-TMDL-02a.pdf

Pollutants of Concern: Total Suspended Solids, Total Phosphorus, Total Nitrogen, and *E.*coli

MS4 WLAs: WLAs apply to all MS4s that were co-permittees at the time of TMDL development; therefore, WLAs are aggregated and not individually assigned to each MS4.

TSS – 137 tons/year for Bozeman Creek watershed and 3.4 tons/year for Bear Creek watershed based on a 37% reduction in sediment loads.

Nutrients – Since the storm water system should not be actively discharging during typical summer low flow conditions, both the existing load and WLA are defined as zero for Bozeman Creek, East Gallatin River, Bridger Creek, and Mandeville Creek.

***Escherichia* coli (E. coli) –** The MS4 will is assigned a WLA of zero in Bozeman Creek when the storm water system is not activated.

Assumptions and Actions: Percent reduction allocations and WLAs are not intended to add load limits to the permit. When the storm water system is activated, WLAs are met by adhering to the permit

requirements to minimize pollutant loads. Monitoring data should continue to be evaluated to assess BMP performance, help determine where additional BMPs may be necessary, and implement an adaptive management approach to minimize pollutant loads. As required by the permit, an illicit discharge detection and elimination program is necessary to achieve WLAs for nutrients and *E.*coli.

BUTTE-SILVER BOW (BSB)

Name and Date of TMDL: Upper Clark Fork Phase 2 Sediment and Nutrients TMDLs and Framework Water Quality Improvement Plan (April 2014);
http://deq.mt.gov/Portals/112/Water/WQPB/CWAIC/TMDL/C01-TMDL-04a.pdf

Pollutants of Concern: Total Phosphorus, Total Nitrogen, Total Suspended Solids, Metals (Arsenic, Cadmium, Copper, Lead, Mercury, and Zinc)

MS4 WLAs:

TSS – 179 tons/year to Silver Bow Creek (a 76% reduction from the current estimated loads).

Nutrients – Zero lbs/day total nitrogen and total phosphorus in Silver Bow Creek when the storm water system is not activated.

Metals – The BSB MS4 and the Butte Area Superfund Site are presently addressed in Silver Bow Creek via a composite WLA (WLA_{Butte}) due to areas that overlap:

Arsenic: 2.38 lbs/day

Cadmium: 0.07 lbs/day

Copper: 2.85 lbs/day

Lead: 1.09 lbs/day

Mercury: 0.01 lbs/day

Zinc: 36.6 lbs/day

Assumptions and Actions: Percent reduction allocations and WLAs are not intended to add load limits to the permit. When the storm water system is activated, WLAs are met by adhering to the permit requirements to minimize pollutant loads. Additionally, the Superfund site has the goal of meeting water quality targets in Silver Bow Creek with direction from the CERCLA program. Monitoring data should continue to be evaluated to assess BMP performance, help determine where additional BMPs may be necessary, and implement an adaptive management approach to minimize pollutant loads. As required by the permit, an illicit discharge detection and elimination program is necessary to achieve the WLA for nutrients.

CITY OF KALISPELL

Name and Date of TMDL: Flathead-Stillwater Planning Area Nutrient, Sediment, and Temperature TMDLs and Water Quality Improvement Plan (December 2014) which references Flathead Lake Nutrient TMDL Document (Phase 1, 2002);
http://deq.mt.gov/Portals/112/Water/WQPB/TMDL/PDF/FlatheadStillwater/C11-TMDL-02a.pdf
Pollutants of Concern: Total Phosphorus, Total Nitrogen, Nitrate + Nitrite, Dissolved Oxygen, Sediment, Temperature

MS4 WLAs:

Phosphorus – 15 lbs/growing season for Middle Ashley Creek (44% reduction), 13 lbs/growing season for Spring Creek (44% reduction), and 54 lbs/growing season for Lower Ashley Creek (44% reduction).

Nitrogen – 292 lbs/growing season for Middle Ashley Creek (30% reduction), 269 lbs/growing season for Spring Creek (30% reduction), and 1030 lbs/growing season for Lower Ashley Creek (30% reduction).

Nitrate + Nitrite – Water quality improvements that address excess total nitrogen loading will also result in decreased Nitrate + Nitrite loading and concentrations.

Sediment – 15.4 tons/year for Middle Ashley Creek (62% reduction), 46.5 tons/year for Lower Ashley Creek (62% reduction), and 16.5 tons/year for Stillwater River (62% reduction).

Dissolved Oxygen and Temperature – None specified.

Assumptions and Actions: The Kalispell MS4 only sporadically discharges during the dry summer growing season. Percent reduction allocations and WLAs are not intended to add load limits to the permit. When the storm water system is activated, WLAs are met by adhering to the permit requirements to minimize pollutant loads. Water quality improvements addressed in Nutrient TMDLs will result in improved DO concentrations and discharge temperatures will be consistent with naturally occurring conditions by adhering to the permit requirements. Monitoring data should continue to be evaluated to assess BMP performance, help determine where additional BMPs may be necessary, and implement an adaptive management approach to minimize pollutant loads.

CITY OF MISSOULA and UNIVERSITY OF MONTANA- MISSOULA

Name and Date of TMDL: Silver Bow Creek and Clark Fork River Metals TMDLs (May 2014); http://deq.mt.gov/Portals/112/Water/WQPB/CWAIC/TMDL/C01-TMDL-05a.pdf, Bitterroot Watershed Total Maximum Daily Loads and Water Quality Improvement Plan (December 2014); http://deq.mt.gov/Portals/112/Water/WQPB/TMDL/PDF/Bitterroot/C05-TMDL-04a.pdf, Bitterroot Temperature and Tributary Sediment Total Maximum Daily Loads and Framework Water Quality Improvement Plan (August 2011); http://deq.mt.gov/Portals/112/Water/WQPB/CWAIC/TMDL/C05-TMDL-03a.pdf, and Central Clark Fork Basin Tributaries TMDLs and Water Quality Improvement Plan (September 2014); http://deq.mt.gov/Portals/112/Water/WQPB/CWAIC/TMDL/COL-TMDL-01a.pdf

Pollutants of Concern: Total Nitrogen, Sediment, Metals (Arsenic, Cadmium, Copper, Lead, Iron, and Zinc)

MS4 WLAs:

Nutrients – Zero lbs/day for Grant Creek.

Sediment – 7.8 tons/year for Grant Creek (53% reduction).

Temperature – None specified.

Metals – 0.009 lbs/day of copper, 0.0045 lbs/day of lead, and 0.00004 lbs/day of zinc for the Clark Fork River (MT76M001_030, Blackfoot River to Rattlesnake Creek) (55% reduction).

1.1 lbs/day of copper and 0.51 lbs/day of lead for the Clark Fork River (MT76M001_020, Rattlesnake Creek to Fish Creek) (40% reduction).

0.08 lbs/day of lead for the Bitterroot River (54% reduction).

Assumptions and Actions: Percent reduction allocations and WLAs are not intended to add load limits to the permit. When the storm water system is activated, WLAs are met by adhering to the permit

requirements to minimize pollutant loads. As required by the permit, an illicit discharge detection and elimination program is necessary to achieve the WLA for nutrients. Monitoring data should continue to be evaluated to assess BMP performance, help determine where additional BMPs may be necessary, and implement an adaptive management approach to minimize pollutant loads. Missoula must follow their permit requirements, evaluate potential impacts to impaired receiving waters, and implement Low Impact Development practices to meet the intent of the TMDL goals and future recommendations.

Appendix C. MCM 1 and 2

Participation of Key Target Audiences Implemented in 2023

Key Target Audience	Residential Behavior	Business Type	Reasoning for Selection	Associated Pollutants	Date Annual Review and Pollutant Update Conducted	Passive Outreach Strategy	Active Outreach Strategy	Planned Timeframe	Metric	Participation
1: Pet Waste	X		Common source of pollutants	Nutrients	2/21/2023		Pet Waste Stations	Continuous	Amount of Mutt Mitts Distributed	320000
	X		Common source of pollutants	Nutrients	2/21/2023	Informative Articles or Stories		Continuous	Full Video Views	8520
2: General Common Education	X		Dumping within the permitted MS4	Latex Paint	2/21/2023		Cleanup Event	4/14/2023	Estimated Weight Collected	4520lbs
	X		Dumping within the permitted MS4	Latex Paint	2/21/2023		Cleanup Event	10/20/2023	Estimated Weight Collected	4760lbs
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	2/21/2023		Part in Community Event	8/12/2023	Estimated Public Participation	500
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	2/21/2023	Social Media		04/01/2023-04/30/2023	Estimated Public Participation	75
3: Post Construction Facility Owners		X	Dumping within the permitted MS4	Latex Paint	2/21/2023		Cleanup Event	4/14/2023	Estimated Weight Collected	4520lbs
		X	Dumping within the permitted MS4	Latex Paint	2/21/2023		Cleanup Event	10/20/2023	Estimated Weight Collected	4760lbs
4: Lawn and Garden Care	X		Common source of pollutants	Pesticides	7/12/2023		Cleanup Event	9/21/2023	Number of Participants	29
5: Restaurant or Food Trucks		X	Dumping within the permitted MS4	Fats, Oils, and Grease	2/21/2023	Brochures/Fliers		Continuous	Total Distribution	9

Key Target Audiences, Activities, and Goals Planned for 2024

Key Target Audience	Residential Behavior	Business Type	Reasoning for Selection	Associated Pollutants	Date Annual Review and Pollutant Update Conducted	Passive Outreach Strategy	Active Outreach Strategy	Planned Timeframe	Metric	Goal
1: Pet Waste	X		Common source of pollutants	Nutrients	1/17/2024		Pet Waste Stations	Continuous	Amount of Mutt Mitts Distributed	320000
	X		Common source of pollutants	Nutrients	1/17/2024	Informative Articles or Stories		Continuous	Full Video Views	10000
2: General Common Education	X		Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event	04/15/2024-05/15/2024	Estimated Weight Collected	5000lbs
	X		Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event	09/15/2024-10/15/2024	Estimated Weight Collected	5000lbs
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/17/2024		Part in Community Event	8/1/2024	Estimated Public Participation	500
3: Post Construction Facility Owners		X	Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event	04/15/2024-05/15/2024	Estimated Weight Collected	5000lbs
		X	Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event	09/15/2024-10/15/2024	Estimated Weight Collected	5000lbs
4: Car Washing/Care	X		Spill	Automotive Fluids	1/17/2024	Social Media		01/01/2024-12/31/2024	Post Views	45
5: Construction Industry		X	Common source of pollutants	Sediment	1/17/2024		Industry Specific Training	04/01/2024- 12/31/2024	Training Attendance	10

Participation of Key Target Audiences Implemented in 2024

Key Target Audience	Residential Behavior	Business Type	Reasoning for Selection	Associated Pollutants	Date Annual Review and Pollutant Update Conducted	Passive Outreach Strategy	Active Outreach Strategy	Planned Timeframe	Metric	Participation
1: Pet Waste	X		Common source of pollutants	Nutrients	1/17/2024		Pet Waste Stations	Continuous	Amount of Mutt Mitts Distributed	480000
	X		Common source of pollutants	Nutrients	1/17/2024	Informative Articles or Stories		Continuous	Full Video Views	86
2: General Common Education	X		Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event - Latex Paint Event	05/09/2024-05/12/2024	Estimated Weight Collected	2400lbs
	X		Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event - Latex Paint Event	11/08/2024-11/17/2024	Estimated Weight Collected	3020lbs
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/17/2024		Part in Community Event - Watershed Festival	8/17/2024	Estimated Public Participation	550
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/17/2024	Social Media/Newsletter		01/01/2024-12/31/2024	Mailing List	70
3: Post Construction Facility Owners		X	Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event - Latex Paint Event	05/09/2024-05/12/2024	Estimated Weight Collected	2400lbs
		X	Dumping within the permitted MS4	Latex Paint	1/17/2024		Cleanup Event - Latex Paint Event	11/08/2024-11/17/2024	Estimated Weight Collected	3020lbs
4: Car Washing/Care	X		Spill	Automotive Fluids	1/17/2024	Social Media/Newsletter		01/01/2024-12/31/2024	Mailing List	70
5: Construction Industry		X	Common source of pollutants	Sediment	1/17/2024		Industry Specific Training	Continuous	Total Distribution	9

Key Target Audiences, Activities, and Goals Planned for 2025

Key Target Audience	Residential Behavior	Business Type	Reasoning for Selection	Associated Pollutants	Date Annual Review and Pollutant Update Conducted	Passive Outreach Strategy	Active Outreach Strategy	Planned Timeframe	Metric	Goal
1: Pet Waste	X		Common source of pollutants	Nutrients	1/6/2025		Pet Waste Stations	Continuous	Amount of Mutt Mitts Distributed	500000
	X		Common source of pollutants	Nutrients	1/6/2025	Informative Articles or Stories		Continuous	Full Video Views	250
2: General Common Education	X		Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event- Latex Paint Event	04/15/2025-05/15/2025	Estimated Weight Collected	4000lbs
	X		Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event - Latex Paint Event	09/15/2025-10/15/2025	Estimated Weight Collected	4000lbs
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/6/2025	Social Media/Newsletter		01/01/2025-12/31/2025	Mailing List	100
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/6/2025		Part in Community Event- Farmer's Market	4/26/2025-10/25/2025	Estimated Public Participation	500
3: Post Construction Facility Owners		X	Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event - Latex Paint Event	04/15/2025-05/15/2025	Estimated Weight Collected	4000lbs
		X	Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event - Latex Paint Event	09/15/2025-10/15/2025	Estimated Weight Collected	4000lbs
4: Car Washing/Care	X		Spill	Automotive Fluids	1/6/2025	Social Media/Newsletter		01/01/2025-12/31/2025	Mailing List	100
5: Construction Industry		X	Common source of pollutants	Sediment	1/6/2025		Industry Specific Training	Continuous	Total Distribution	10

Participation of Key Target Audiences Inplemented in 2025

Key Target Audience	Residential Behavior	Business Type	Reasoning for Selection	Associated Pollutants	Date Annual Review and Pollutant Update Conducted	Passive Outreach Strategy	Active Outreach Strategy	Planned Timeframe	Metric	Participation
1: Pet Waste	X		Common source of pollutants	Nutrients	1/6/2025		Pet Waste Stations	Continuous	Amount of Mutt Mitts Distributed	326000
	X		Common source of pollutants	Nutrients	1/6/2025	Informative Articles or Stories		Continuous	Full Video Views	74
2: General Common Education	X		Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event- Latex Paint Event	04/15/2025-05/15/2025	Estimated Weight Collected	9300lbs
	X		Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event - Latex Paint Event	09/15/2025-10/15/2025	Estimated Weight Collected	9000lbs
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/6/2025	Social Media/Newsletter		01/01/2025-12/31/2025	Mailing List	230
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/6/2025		Part in Community Event(s)- may include: Farmers' Market Booth, Targeted Local Challenges, and Watershed Festival	4/26/2025-10/25/2025	Estimated Public Participation	1000
3: Post Construction Facility Owners		X	Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event - Latex Paint Event	04/15/2025-05/15/2025	Estimated Weight Collected	9300lbs
		X	Dumping within the permitted MS4	Latex Paint	1/6/2025		Cleanup Event - Latex Paint Event	09/15/2025-10/15/2025	Estimated Weight Collected	9000lbs
4: Car Washing/Care	X		Spill	Automotive Fluids	1/6/2025	Social Media/Newsletter		01/01/2025-12/31/2025	Mailing List	230
5: Construction Industry		X	Common source of pollutants	Sediment	1/6/2025		Industry Specific Training	Continuous	Total Distribution	7

Key Target Audiences, Activities, and Goals Planned for 2026

Key Target Audience	Residential Behavior	Business Type	Reasoning for Selection	Associated Pollutants	Date Annual Review and Pollutant Update Conducted	Passive Outreach Strategy	Active Outreach Strategy	Planned Timeframe	Metric	Goal
1: Pet Waste	X		Common source of pollutants	Nutrients	1/9/2026		Pet Waste Stations	Continuous	Amount of Mutt Mitts Distributed	400000
	X		Common source of pollutants	Nutrients	1/9/2026	Informative Articles or Stories		Continuous	Full Video Views	100
2: General Common Education	X		Dumping within the permitted MS4	Latex Paint	1/9/2026		Cleanup Event- Latex Paint Event	04/15/2025-05/15/2025	Estimated Weight Collected	6000lbs
	X		Dumping within the permitted MS4	Latex Paint	1/9/2026		Cleanup Event - Latex Paint Event	09/15/2025-10/15/2025	Estimated Weight Collected	6000lbs
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/9/2026	Social Media/Newsletter		01/01/2025-12/31/2025	Mailing List	250
	X	X	Dumping within the permitted MS4	Non-point Source Pollutants	1/9/2026		Part in Community Event(s)- may include: Farmers' Market Booth, Targeted Local Challenges, and Watershed Festival	4/26/2025-10/25/2025	Estimated Public Participation	1500
3: Post Construction Facility Owners		X	Dumping within the permitted MS4	Latex Paint	1/9/2026		Cleanup Event - Latex Paint Event	04/15/2025-05/15/2025	Estimated Weight Collected	6000lbs
		X	Dumping within the permitted MS4	Latex Paint	1/9/2026		Cleanup Event - Latex Paint Event	09/15/2025-10/15/2025	Estimated Weight Collected	6000lbs
4: Car Washing/Care	X		Spill	Automotive Fluids	1/9/2026	Social Media/Newsletter		01/01/2025-12/31/2025	Mailing List	250
5: Construction Industry		X	Common source of pollutants	Sediment	1/9/2026		Industry Specific Training	Continuous	Total Distribution	10

Appendix D. MCM 3

Part II.A.2.a.i. and ii

Potential Non-Storm Water Discharge	Significant or Non-significant Contributor of	Date Reviewed	Associated Pollutants	Local Controls or Conditions	Reason for Non-Significance	Notes
Water Line Flushing	Non-Significant	2/27/2025	Chlorine	Dechlorinators are required to be used. No discharges to State Waters, captured in Regional Stormwater Ponds	Pollutant removed prior to discharge. No discharge to state waters.	Exempt per 6-6-10 of Helena City Code
Landscape Irrigation	Non-Significant	2/27/2025	Chlorine, Nutrients, and Pesticides	None	Overspray and breaks are usually repaired by the owner or reported by residences or City personnel	Exempt per 6-6-10 of Helena City Code
Diverted Stream Flows	Non-Significant	2/27/2025	Biological Contaminants, Sediment, Organic Material	None	None located within Helena City Limits	Exempt per 6-6-10 of Helena City Code
Rising Groundwater	Non-Significant	2/27/2025	Biological Contaminants and Minerals	None	Infrequent localized occurrence	Exempt per 6-6-10 of Helena City Code
Uncontaminated Groundwater Infiltration	Non-Significant	2/27/2025	Sediment and Minerals	None	Minimal pollution potential	Exempt per 6-6-10 of Helena City Code
Uncontaminated Pumped Groundwater	Non-Significant	2/27/2025	Sediment and Minerals	None	Infrequent occurrence	Exempt per 6-6-10 of Helena City Code
Discharges from Potable Water Sources	Non-Significant	2/27/2025	Chlorine	None	Overspray and breaks are usually repaired by the owner or reported by residences or City personnel	Exempt per 6-6-10 of Helena City Code
Foundation Drains	Non-Significant	2/27/2025	Biological Contaminants and Minerals	None	Infrequent occurrence	Exempt per 6-6-10 of Helena City Code
Air Conditioning Condensation	Non-Significant	2/27/2025	Sediment and Copper	None	Infrequent occurrence and small scale	Exempt per 6-6-10 of Helena City Code
Irrigation Water	Non-Significant	2/27/2025	Chlorine, Nutrients, and Pesticides	None	Overspray and breaks are usually repaired by the owner or reported by residences or City personnel	Exempt per 6-6-10 of Helena City Code
Springs	Non-Significant	2/27/2025	Biological Contaminants, Sediment, Organic Material		Infrequent occurrence	Exempt per 6-6-10 of Helena City Code
Water from Crawl Space Pumps	Non-Significant	2/27/2025	Biological Contaminants and Minerals	None necessary, not a significant contributor of pollutants	Infrequent occurrence and small scale	
Footing Drains	Non-Significant	2/27/2025	Biological Contaminants and Minerals	None	Infrequent occurrence and small scale	Exempt per 6-6-10 of Helena City Code
Lawn Watering	Non-Significant	2/27/2025	Chlorine, Nutrients, and Pesticides	None	Infrequent occurrence and small scale	Exempt per 6-6-10 of Helena City Code
Individual Residential Car Washing	Non-Significant	2/27/2025	Chlorine, Soap, Automotive Fluids, Sediment, Phosphorous	None	Not significant contributor of pollutants, infrequent and small scale	Exempt per 6-6-10 of Helena City Code
Flows from Riparian Habitats and Wetlands	Non-Significant	2/27/2025	Biological Contaminants, Sediment, and Organic Material	None	Not significant contributor of pollutants	Exempt per 6-6-10 of Helena City Code
Dechlorinated Swimming Pool Discharges	Non-Significant	2/27/2025	Biological Contaminants, Chlorine Residuals	None	Not significant contributor of pollutants	
Street Wash Water	Non-Significant	2/27/2025	Sediment	None	Not significant contributor of pollutants	Exempt per 6-6-10 of Helena City Code
Charity Car Washes	Non-Significant	2/27/2025	Chlorine, Soap, Automotive Fluids, Sediment, Phosphorous	None	Infrequent occurrence	
Water Main Breaks	Non-Significant	2/27/2025	Chlorine	Isolation/Termination	Rare and unpredictable	
Firefighting Activities	Non-Significant	2/27/2025	Chlorine, Fire Suppression Chemicals, Debris	Standard operating procedures	Emergency response	Exempt per 6-6-10 of Helena City Code

Overall Storm System and Basins
City of Helena, MT

Sevenmile Creek
Tenmile Creek
WWTP Effluent Canal
Helena Valley Canal
Prickly Pear Creek

West Basin
Last Chance Gulch Basin
Davis Gulch Basin
Airport Basin
Bull Run Basin
Far East Basin

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34

Legend

- Existing Outfalls
- Storm Water Pond
- Helena Canals & Irrigation Ditches
- Streams
- Storm Drain
- Helena City Limits

Layer

Storm Basins

- Airport Basin
- Bull Run Basin
- Davis Gulch Basin
- Far East Basin
- Last Chance Gulch Basin
- West Basin

0.5 Miles

CITY OF HELENA
Est. 1881

Outfall No.	Drainage Basin	Outfall BMP	Outfall Conveyance	Street Location
1	Westside	East Simmons Detention Pond	30 inch	Broadwater Ave and spring meadow
2		West Simmons Detention Pond	12 inch	Broadwater and Motor Ave
3		Henderson Retention Pond Complex	24 inch 24 inch	Silsbee Ave and Mitchell near Fairgrounds
4		Fairgrounds Detention Pond	16 inch	Fairgrounds east of Arena
5		North Stone Meadows Detention Pond	8 inch	Andesite Ave and crystal springs creek
6		Central Stone Meadows Detention Pond	10 inch	Benton Ave and Flagstone Ave
7		South Stone Meadows Detention Pond	8 Inch	Benton Ave south of Obsidian Ave
8		Crystal Springs Detention Pond	Open Channel	Benton and Willowbrook
9		County Shop Detention Basin	Open Channel	E of N Benton and Willowbrook Drive
10	Last Chance	Nature Park Retention Pond, and on-site detention/ret ponds	24 inch	McHugh Lane north of Golden Estates subdivision
11		Golden Estates Detention Pond	18 inch	Jade Street and Amethyst Ave (golden estates)
12		Skelton Detention 1, 2, 3, and 4	24 inch	North of Ptarmigan and Montana Ave
13		Anderson BP Detention and open channel	Open Channel	S of Road Runner and Sand Piper
14	Davis	Target Retention Pond	36 inch	Jordan Drive behind Macy's
15		Davis Region Pond and Kmart Pond	48 inch	I-15 Regional Ponds
16	Bull Run West	Burnham Ranch Retention Pond		
17		Helena Regional Detention and York and Custer Detention	55 inch	York Road north of Custer
18	Airport	Airport Detention 4, 5.1, and 5.2 and 1400ft of open channel	21 inch	Canyon Ferry Road east of Y-county
19		Airport Retention R-13 and National Guard, Helena Aviation, Fire and D10 Detention	48 x 60 inch	Helena Valley Canal Crossing east of National Guard
20		Airport Retention R-910 and Detention Pond 2	54 inch	Helena Valley Canal Crossing east end Airport
21	Bull Run Upstream of Airport	Walmart Detention 1 and 2	36 in	NW of Miller and Carter
22		Staples Detention	18 in	NW of Miller and Carter
23		Future Nichole St Pond	36 in	N of Nichole St and RR Tracks
24		Open Channel	Open Channel	N of Dick Anderson Construction
25		Hunters Point and Mountain West Bank Detention	Open Channel	N of I15, upstream of Synness Auto Salvage
26		Nob Hill Retention 1 and 2, and Nob Hill Detention 1, Grass swale along I15	24 in	NW of I15 and Mendocino Drive
27	Far East	Nob Hill Detention 4	Open Channel	Colonial drive south of Nob Hill Lift station
28		Aspen Meadows Detention	84 inch	Alice street East of Crossroads Pkwy
29		Grass channel, small basin at culvert inlet	2-24 inch	Crossroads Pkwy and Prospect Ave (highway 12)
30		West Aspen Meadows Retention	24 inch	Alice street East of Cascade Ave
31		East Aspen Meadows Retention	42 inch	Twilight and Stillwater streets
32		East Aspen Meadows Retention	12 inch	Runkle Pkwy between Still water and Alpine View
33		Open Channel for 700ft	12 inch	Runkle Pkwy and Highway 282
34		Aspen Meadows Detention North and South	36 inch	Highway 282 south of Runkle Parkway

2022 Summary of Illicit Discharge Investigations and Corrective Actions

Work Order #	Description	Location	Date			Employee	Comments
			Received	Initial Response	Resolution		
231267	Storm Inlet-Illicit Discharge	822 5th Ave	4/4/2022	4/4/2022	4/6/2023	Shane Bogard	Shane Bogard received a call indicating there was a car leaking oil on the street at 822 5th Ave. Bogard utilized the assistance of HPD to help locate the owner, found the cat had bad plates. HPD towed the car on 04/06/2023 and the clean area where the car was parked.
236645	Illicit Discharge	1101 Floweree	5/4/2022	5/19/2022	6/2/2022	Shane Bogard	Matt Culpo received a call indicating that A Jay Concrete had a pump truck that blew a hydraulic hose at 1101 Floweree. Bogard called Amos (owner) 406-799-7050 and Kyle Weiver (Helena Rep for A Jay) 406-750-3296. Approximately 10 gallons of fluid was spilled on a asphalt surface. A Jay removed all the loose material that was contaminated along the curb and worked the asphalt with absorbent material then swept and bagged all of the contaminated material.
237399	Stormwater Node- Illicit Discharge	3424 US HWY 12	6/7/2022	6/7/2022	6/9/2022	Shane Bogard	DEQ received a report of an illicit discharge on 06/01/2022. The City received the report on 06/07/2022. Between 06/01/2022 to 06/07/2022 there were heavy rains. This resulted in the site being clean when the City inspected the site on 06/07/2022.
241944	Illicit Discharge	706 None Such Rd	8/17/2022	8/17/2022	8/30/2022	Shane Bogard	Bogard receive a service request about a white truck that rarely moves leaking oil onto the street. Bogard located the owner at 706 None Such Rd and spoke with Emily Sweeny 406-350-1335. Ms. Sweeny was just leaving town when Bogard spoke with her and she state she would have the issue taken care of when she returned. Bogard conducted a followup site visit on 08/30/22 and the truck located in the driveway and the oil was cleaned up.
243221	Wastewaster Service- Illicit Discharge	1150 11th Ave	9/26/2022	9/26/2011	10/21/2022	Shane Bogard	Trent Sheuer received an email informing the City of a potential discharge at the Walgreens on 11th Ave and Montana. An onsite visit confirmed the service line was surcharged to the point of leaking into the parking lot. Trent showed the manager of Walgreens. The Manager of Walgreens contacted a plumber to unplug the line. Shane Bogard followed up to ensure it is addressed and cleaned up on 10/21/2022. Bogard confirmed the service line was working properly and the asphalt has been cleaned up.

2023 Summary of Illicit Discharge Investigations and Corrective Actions

Description	Location	Date			Employee	Comments
		Received	Initial Response	Resolution		
Illicit Discharge	LeGrande Cannon BLVD	3/22/2023	3/22/2023	3/22/2023	Trent Scheuer and Leea Anderson	Trent Scheuer received report of Sparrow Enterprises cement truck cleaning out in storm ditch at the intersection of Allison and LeGrande Cannon. Visited the site with Leea Anderson. Found the truck had washed the residue from the chutes. No cleanup required due to quantity and de minimis impact. Spoke with an employee from Matrix construction who stated they instructed the driver to clean out on their site. He will ensure all future trucks washout within their site.
Illicit Discharge	3101 Cooney	7/7/2023	7/10/2023	8/4/2023	Adam Jorgenson and Leea Anderson	Complaint from the Pine View Apartment construction site included offsite tracking of sediment. Construction Site Inspection performed on 07/11/2023. Determined the site is not being managed per the requirements of DEQ's General Construction Storm Water Permit and SWPPP. Numerous SWPPP issues found. Notice of Violation sent on 07/13/2023. Received a response on 07/28/2023 stating that the issues identified at the site had been corrected. Site reinspected on 08/04/2023 and confirmed correction of issues.
Illicit Discharge	415 Last Chance Gulch	7/13/2023	7/14/2023	9/12/2023	Leea Anderson	The City of Helena received the complaint from DEQ Enforcement (CVID 25184) "transcript from complainant " I have been trying for six months to get this guy to stop driving this van. I have contacted countless city officials, and everyone says they don't have the jurisdiction to stop him from dumping 2 quarts of oil a day. I finally got him to stop parking over the storm drain to control the mess but now he just parked in the parking lots of banks and stores." This was the first staff had received a report of this complaint. Vehicle identified as an older white dodge caravan. License plate #565683B. Possibly owned by Johnnie Abraham. No known residential address. City staff attempted to locate the vehicle and was able to find the locations in the photos supplied in the complaint but were unable to locate the vehicle. City staff walked the downtown area multiple times attempting to locate the vehicle and were unable to find it again.
Illicit Discharge	530 Baarson Blvd	8/7/2023	8/8/2023	8/8/2023	Leea Anderson	"trailer leaking oil on street, red van colliding with Private retaining wall." Leea Anderson performed a site inspection on 08/08/2023 and was unable to find anything matching the description of the complaint or any evidence of leaks or oil stains indicative of an illicit discharge.
Illicit Discharge	658 N Warren St	8/7/2023	8/8/2023	8/8/2023	Leea Anderson	"Vehicle has been parked in front of my house without moving for over a month and is leaking oil in addition to take up limited parking spots". Leea Anderson performed a site inspection on 08/08/2023. The automotive fluids leaking from the vehicle were very minimal especially due to the duration of time the complaint indicated the vehicle had been sitting at the location. No illicit discharge determined.
Storm Inlet-Illicit Discharge	2521 McHugh	8/23/2023	8/24/2023	9/5/2023	Adam Jorgenson	On August 23, 2023, the City of Helena (City) received a complaint regarding the construction being completed at 2521 McHugh Lane (Site). The complainant notified the City that a concrete truck supplying concrete for Site work was cleaning out excess concrete in the street curb and gutter. City personnel completed an onsite inspection on August 24, 2023, to determine the validity of the complaint in compliance with the requirements of the City Municipal Separate Storm Sewer System (MS4) Permit issued by the Montana Department of Environmental Quality (DEQ). During the onsite inspection City personnel determined that an illicit discharge had occurred and concrete slurry was washed down the street and remained in the curb and gutter flow line. Received photos showing the cleanup on September 5, 2023.

Storm Inlet-Illicit Discharge	2507 Gold Rush	8/31/2023	8/31/2023	9/5/2023	Shane Bogard and Adam Jorgenson	Shane Bogard received a couple complaints stating a new home construction site has some concrete washout residuals and construction site sediment is getting to the curb and street. Contact was made to the contractor Ryan Werner 406-439-0699. Ryan Werner returned the call and state he is no longer the contractor of this site. He stated that Dustin Bauch with Level Line Construction is the new contractor. Adam Jorgenson sent a Warning Letter to the contractor site cleaned up.
Storm Inlet-Illicit Discharge	McHugh Recycling Center	9/8/2023	9/8/2023	9/8/2023	Leea Anderson	City received a complaint of sediment into storm drains from the new County Recycling Drop-off site on McHugh. Ed Coleman, Miranda Griffis, and Leea Anderson went onsite. Complaint indicated sediment coming from recycling site. No erosion off-site apparent. Slopes from site drain to old gravel pit to the west of the site. The road is to the east of the site across approximately 20ft of vegetative buffer. Sediment and vegetation apparent in the storm drain inlet on the east and west side of the road and down both curb lines in both directions. Significantly more traffic apparent from the Steed Industrial Complex (located in County) to the north of the site. Investigation continued off-site of initial complaint and additional sediment contributions identified based on site observations that sediment appears to be getting tracked into the area from the residences located on dirt roads in the County to the north. Numerous dirt roads identified to the north of the site and a single contributor was unable to be identified. Storm drain to the south near Roadrunner is also significantly impacted with sediment and vegetative debris. Inspection was performed following a significant storm event. Transportation contacted and sent a street sweeper to McHugh promptly.
Illicit Discharge	1280 Boulder Ave	11/8/2023	11/9/2023	1/1/2024	Adam Jorgenson	On November 8, 2023, the City of Helena (City) received a complaint regarding the construction being completed at 1280 Boulder Ave, the Helena Food Share (Site), which is currently under construction. City personnel completed an onsite inspection on November 9, 2023, to determine the validity of the complaint in compliance with the requirements of the City's MS4 Permit issued by the Montana Department of Environmental Quality (DEQ). During the Site inspection City Personnel determined that the Site is not being managed per the requirements of DEQ's General Construction Permit effective January 1, 2023, and the owner/operator's active Notice of Intent and Storm Water Pollution Prevention Plan (SWPPP) (Permit #MTR110082). The violations found on Site of DEQ's General Construction Permit are listed below, please also see the attached inspection report for additional information: 2.1.2 Erosion and Sediment Control, D.1,2 Soil disturbance exceeds project boundaries shown on SWPPP Site map, material storage/ soil storage is being completed on the neighboring lot. SWPPP and SWPPP Site map will need to be updated to include the additional lot area and appropriate BMP's being utilized. Violation resolved when the neighboring site obtained a SWPPP.

Illicit Discharge	516 Hillsdale	11/17/2023	11/21/2023	1/22/2024	Shane Bogard and Leea Anderson	Report received multiple times through the My Helena App starting on 11/17/2023. "On a daily basis, the resident of 578 Hillsdale fills her vehicle with transmission fluid that leaks all over the street and sidewalk. The caller state that she has confronted this person about hazardous fluid and was told by this person that she doesn't care. The police have been called, but no action has been taken. The neighbors have been doing their best to clean up the spills, but it has gotten out of control." Shane Bogard went to the site multiple times to contact the individual and was unable to get a response at the residence. A street sweeper was deployed to the site multiple times. It appears there have been multiple vehicles leaking at the location prior to the current incident. The vehicle was identified as a Silver 2002 Pontiac Grand Prix SE, License plate 185987A, VIN: IG2WK52J32F108303, contact information for registered owner was Butte, unable to find a Helena address for the owner. Vehicle no longer at the location as of 01/22/2024

2024 Summary of Illicit Discharge Investigations and Corrective Actions

Description	Location	Date			Employee	Comments
		Received	Initial Response	Resolution		
Illicit Discharge	1201 Cedar St	4/5/2024	4/5/2024	4/5/2024	Adam Jorgenson and Leea Anderson	Complaint regarding concerns that the sewer and water used at Woody's Car Wash was also draining to the storm system. Inspection demonstrated no sewer or car wash water being sent into the storm system, only the wastewater system. No evidence of illicit discharge to the storm system observed.
Storm Inlet-Illicit Discharge	1048 E 6th Ave	4/29/2024	4/29/2024	4/29/2024	Darren Ramos, Craig Sundberg, and Leea Anderson	Complaint regarding concrete trucks washing out in the alley along 6th avenue. Inspection performed with City staff and All Around Construction, David Whaley. Capital Concrete was the concrete supply company. Concrete washout was observed in the alleys and storm drains on Dakota, K st, and Knight. Compliance assistance, Violation Letters, and cleanup orders issued. Evidence of illicit discharge of concrete washout present.
Illicit Discharge	1732 Floweree St	5/20/2024	5/20/2024	5/21/2024	Leea Anderson	Complaint regarding concrete washout in the alley behind a new residential home being built at 1732 Floweree St. Robert Richards called on 05/20/2024 and stated that there had been concrete trucks washing out in the alley. During an inspection City staff were able to talk to Jarrod with Great Divide Home Builders. He stated that there had been two concrete suppliers for the job; Sparrow Enterprises and Capital Concrete. The washout in the alley did not reach the storm inlets. Great Divide stated they would cleanup the concrete in the alley. As it was unable to be determined which concrete contractor the release had come from Warning Letters were sent to both.
Illicit Discharge	2517 Airport Rd	6/17/2024	6/17/2024	6/17/2024	Leea Anderson	Complaint received by the City Transportation Department regarding the construction ocurring at 2517 Airport Rd, the State Department of Revenue Liquor Warehouse expansion. The complaint indicated that there was mud being tracked off site by equipment coming from the site on to Airport Rd. City staff contacted Mark Hines with the State he indicated he would speak with the contractor. The site road was cleaned up the next day.
Illicit Discharge	1229 E Lyndale Ave	6/24/2024	6/24/2024	6/24/2024	Shane Bogard and Leea Anderson	Complaint regarding auxiliary black water tank abandonded in boulevard after an RV was forced to be moved. Tank and contents were properly disposed of. There was no discharge or evidence of releases to the storm system.
Illicit Discharge	1805 Joslyn St #22	8/21/2024	8/22/2024	8/22/2024	Leea Anderson	Complaint referred from DEQ Water Protection, CVID 26318, regarding a potential SSO that may be reaching storm water. Inspection determined the SSO had occurred previously and was not actively occurring. No evidence of illicit discharge to the storm system during current or previous discharges. Complaint referred to Beth Norberg with the Lewis and Clark County Health Department as they have primacy on Trailer Parks.

Storm Inlet-Illicit Discharge	1714 11th Ave	8/29/2024	8/29/2024	8/30/2024	Shane Bogard and Leea Anderson	SSO with approximately 990 gallons making it to the storm system. When the City arrived it noted the backup was running across the hotel parking lot and discharging into a storm drain. To mitigate the issue, the City brought a vac truck to the site and vacuumed the storm drain until a septic pumper truck (Cowboy Septic) arrived at 1548 to pump directly from the discharge location. This area is serviced by the K-Mart regional pond with no discharge to receiving waters. To mitigate the issue, the Best Western hired Helena's Drain Doctor to work to remove the obstruction, Cowboy Septic to vac the overflow, and shut down their kitchen and bar (which are thought to be the only connection to that service). This combination appeared to resolve the issue. Best Western was able to fix the pipe and remove the obstruction. Normal operations were able to resume on 08/30/2024 the parking lot and storm sewer were treated with lime.
Illicit Discharge	Terrace Ave	9/10/2024	9/11/2024	9/11/2024	Leea Anderson	Complaint referred from DEQ Enforcement, CVID 26384. Complaint was for a diesel release that occurred outside of the boundaries of the MS4 and did not run on to or impact the MS4. Complaint investigated and location outside of permit authority verified. No illicit discharge to the MS4 storm system.
Illicit Discharge	410 Fee St	9/23/2024	9/24/2024	9/24/2024	Leea Anderson	The complaint was submitted for community decay and stated that "there are 3 cars on the street that are not being used/haven't moved for an extended period of time. These include the following: In front of 409 S Fee Street, there is a white SUV with a flat tire; in front of 410 S Fee Street, there is a greenish-blue minivan with Wyoming plated that is leaking oil all over the street; and in front of 414 S Fee Street, there is a green SUV with a flat tire." Storm water staff reviewed the condition of the minivan with Wyoming plates 8909 and determined the oil from the minivan wasn't excessive or abnormal, but the vehicle did appear to be abandoned. The three vehicles were tagged by city police and either removed by the owners or the police within a week.
Illicit Discharge	1109 Highland	10/8/2024	10/9/2024	10/9/2024	Leea Anderson	That someone had drilled a hole in his gas tank and released approximately 18 gallons of gas. Responding officers placed absorbent to stop the flow of the fuel. The fuel was prevented from reaching the storm drain inlet. The City Transportation Department took a street sweeper to the site and removed the contaminated absorbent and brushed some more in. There is no precipitation predicted for the next couple of days and the temperatures are fore casted to be warm. Any that wasn't recovered by the absorbent will likely volatilize. The ensure protection of the storm drain, Utility Maintenance will place a pig pad in the storm drain for a
Storm Inlet-Illicit Discharge	624 S Harris St	10/15/2024	10/15/2024	10/15/2024	Leea Anderson	Complaint received on 10/15/2024 from County staff that had received it on 10/08/2024. Due to the delay in receipt, the physical evidence of the release was gone. There was not remaining material in the storm drain. City staff reviewed the pictures taken by County staff and determined it was likely fine sediment from a cement truck. The County has agreed to forward these on to City staff in the future. A discharge of a small quanitity of an unknown substance was discharged to the storm system.
Illicit Discharge	1805 Joslyn St #22	11/21/2024	11/21/2024	11/22/2024	Leea Anderson	Complaint referred from DEQ Water Protection, CVID 26575. Same complaint referred on 08/21/2024. Complaint referred to Beth Norberg with Lewis and Clark County Health Department. Non-City SSO was actively occurring at the time of the complaint. No evidence of illicit discharge to the storm system during current discharge.

2025 Summary of Illicit Discharge Investigations and Corrective Actions

Description	Location	Date			Employee	Comments
		Received	Initial Response	Resolution		
Illicit Discharge	900 University St	9/18/2025	9/19/2025	9/29/2025	Leea Anderson and Elizabeth Petersen	Complaint initiated internally by staff regarding concrete trucks wash out. The complainant notified the City that a concrete truck supplying concrete for Site work had cleaned out excess concrete into the alley, street, curb, and gutter. City personnel completed an onsite inspection on September 19, 2025. A Notice of Violation was issued to Double D Concrete from Townsend, MT requiring remediation of the materials released from the concrete washout is required to be completed including cleaning and removal of the illicitly discharged concrete slurry from the alley, road surfaces, and gutters. Completion of remediation and submission of photos demonstrating completion of the cleanup must be completed by October 10, 2025. After not receiving a response from the Responsible Party (Voicemail, email, or NOV) staff returned to the site on 09/29/2025 and verified cleanup had occurred.
Illicit Discharge	1122 Saddle Dr	8/28/2025	8/29/2025	8/29/2025	Leea Anderson	Complaint initiated internally by staff regarding sediment reportedly being stored in the gutter line and concrete wash running to the neighbor's drive approach from a recently constructed retaining wall. No sediment in the street or gutter line during inspection. Concrete wash appeared to be from a residential home owner construction project and not a professional contractor or concrete truck. Materials and run off, not excessive or uncharacteristic of a new retaining wall and driveway. Appeared to be an issue that was exacerbated by an ill timed storm. Left a voicemail with the property owner about the concrete residue and provided educational information. Did not receive a call back or response. No cleanup or additional actions required.
Illicit Discharge	Granite and Woodward	9/4/2025	9/4/2025	9/4/2025	Leea Anderson	Complaint regarding sediment in curbline and concerns about potential stormwater conveyance concerns. The dirt pile was not in the street and contained to the property. It was temporary staging (less than a day) for the installation of an underground sprinkler system. The concerns about the impacts to the stormwater infrastructure were invalidated as the structure is a non-maintained storm ditch that was unimpacted.
Illicit Discharge	903 5th Ave	6/5/2025	6/9/2025	6/9/2025	Leea Anderson	Complaint indicated "New sidewalk done the other day, noticed while walking it looks like the wash out was dumped into the adjacent alley then ran out and across the street and towards the storm sewer. Worried that it might get into the drain if it rains soon." Site was cleaned up prior to staff's ability to inspect the site the following week. No impacts to the storm inlets near the area. Contractor unable to be identified.
Stormwater Conveyance Issue	149 Colter Loop	2/24/2025	2/24/2025	2/24/2025	Adam Jorgenson	Owner called to notify the City that during snow melt and larger storm events water runs between her and her neighbor's property. There is an existing stormwater easement and channel in between the houses. Her concern was that once in gets to the street, ponding occurs. During inspection it was noted that some ponding does occur, but after a point it established positive drainage and starts to drain, meaning ponding will be minimal.

Illicit Discharge	3330 Skyway Dr	2/21/2025	2/24/2025	2/24/2025	Leea Anderson	Complaint referred from DEQ Enforcement, CVID 26771. Complaint stated "The tanker base within Helena MS4 boundary has been directly discharging large volumes of fire retardant and associated materialsto a storm drain. Aerial imagery shows this as a seen attachment. Estimates of material illegally discharged exceeds 100,000 gallons of fire retardant materials." The City contacted the Montana Army National Guard that operate the site. Matt, with the Department of Military Affairs (324-3078), he stated that the site has a closed loop system and is not connected to the City of Helena's storm system. This information was confirmed with the City's Utility Maintenance Section. The ponds nearest the location were visited and there was no observance of an apparent realease of fire retardant. Note: The fire retardant used by the National Guard is a premixed red retardant known as Phos Chek, if 100,000 gallons had been released into the storm system, it would have been very easy to detect in the stormwater ponds of the basin.
Illicit Discharge	Nature Park	7/16/2025	7/17/2025	7/18/2025	Pat Marron, Leea Anderson, and Elizabeth Petersen	Complaint was received by Pat Marron with City Parks. "We received a call yesterday afternoon about the water in Nature Park being "blood red". I checked it out and it did have a rust color to it, but I think it is from the rain we had Tuesday." Leea Anderson and Elizabeth Petersen went to the site on 07/17/2025. The water from the tunnel was clear with no discoloration, odor, or other indications of contamination. There were no stains on the concrete in the tunnel and no staining or residue on the rocks, channel, or vegetation coming our of it. There was a rainbow sheen near a small pool of the opening, but was determined to be biological as it broke up when poked with a stick. The outlet under the bridge was also inspected and was that same as the tunnel. Clear with no indications of contamination. Elizabeth and I also walked doen the the Infiltartion Gallery. There was no water reaching it and no indication of staining or contamination. The coloration was likely due to a red algal bloom.
Illicit Discharge	17 S Beattie St	9/2/2025	9/2/2025	9/2/2025	Leea Anderson and Shan	Complaint stated "Concrete washout. Not a huge dumping, but was enough to run down the entire block and make it to the storm drain. Company or person unknown, originates at/around 17 S Beattie St." Unable to determine the responsible party and construction activity concluded. No large concrete debris washed into the drain that would obstruct flow. City Streets Department conducted street sweeping of the curbline.
Illicit Discharge	130 E 6th Ave	6/7/2025	6/9/2025	7/16/2025	Leea Anderson	Complaint stated " Concrete washout just dumped in big pile on grass lot ans washed down street to adjacent drains. See pics for more details. Assuming it’s the construction company on sidewalk signs." City contractor for ADA compliant ramps All Around Construction. When spoken to then indicated that the BMP they had in place and been vandalized and removed over the weekend and a large storm had washed the residue down the hill from the site. BMPs were replaced and concrete washout was cleaned and removed from the site at the end of the project.

Summary of Any Resulting Actions Taken from Screening Results

Outfall No.	Drainage Basin	Outfall BMP	Outfall Conveyance	Street Location	Inspection Date	Inspection Due	Actions Resulting from Screening Results
1	Westside	East Simmons Detention Pond	30 inch	Broadwater Ave and spring meadow		2023-2026	N/A
2		West Simmons Detention Pond	12 inch	Broadwater and Motor Ave		2023-2026	N/A
3		Henderson Retention Pond Complex	24 inch	Silsbee Ave and Mitchell near Fairgrounds	5/19/2022	2023	None
			24 inch				None
4		Fairgrounds Detention Pond	16 inch	Fairgrounds east of Arena	5/19/2022	2023	None
5		North Stone Meadows Detention Pond	8 inch	Andesite Ave and crystal springs creek	5/19/2022	2023	None
6		Central Stone Meadows Detention Pond	10 inch	Benton Ave and Flagstone Ave	5/19/2022	2023	None
7		South Stone Meadows Detention Pond	8 Inch	Benton Ave south of Obsidian Ave	5/19/2022	2023	None
8		Crystal Springs Detention Pond	Open Channel	Benton and Willowbrook	5/19/2022	2023	None
9		County Shop Detention Basin	Open Channel	E of N Benton and Willowbrook Drive	5/19/2022	2023	None
10	Last Chance	Nature Park Retention Pond, and on-site detention/ret ponds	24 inch	McHugh Lane north of Golden Estates subdivision		2023-2026	N/A
11		Golden Estates Detention Pond	18 inch	Jade Street and Amethyst Ave (golden estates)		2023-2026	N/A
12		Skelton Detention 1, 2, 3, and 4	24 inch	North of Ptarmigan and Montana Ave		2023-2026	N/A
13		Anderson BP Detention and open channel	Open Channel	S of Road Runner and Sand Piper		2023-2026	N/A
14	Davis	Target Retention Pond	36 inch	Jordan Drive behind Macy's		2023-2026	N/A
15		Davis Region Pond and Kmart Pond	48 inch	I-15 Regional Ponds		2023-2026	N/A
16	Bull Run West	Burnham Ranch Retention Pond				2023-2026	N/A
17		Helena Regional Detention and York and Custer Detention	55 inch	York Road north of Custer		2023-2026	N/A
18	Airport	Airport Detention 4, 5.1, and 5.2 and 1400ft of open channel	21 inch	Canyon Ferry Road east of Y-county		2023-2026	N/A
19		Airport Retention R-13 and National Guard, Helena Aviation, Fire and D10 Detention	48 x 60 inch	Helena Valley Canal Crossing east of National Guard		2023-2026	N/A
20		Airport Retention R-910 and Detention Pond 2	54 inch	Helena Valley Canal Crossing east end Airport		2023-2026	N/A
21	Bull Run Upstream of Airport	Walmart Detention 1 and 2	36 in	NW of Miller and Carter		2023-2026	N/A
22		Staples Detention	18 in	NW of Miller and Carter		2023-2026	N/A
23		Future Nichole St Pond	36 in	N of Nichole St and RR Tracks		2023-2026	N/A
24		Open Channel	Open Channel	N of Dick Anderson Construction		2023-2026	N/A
25		Hunters Point and Mountain West Bank Detention	Open Channel	N of I15, upstream of Synness Auto Salvage		2023-2026	N/A
26		Nob Hill Retention 1 and 2, and Nob Hill Detention 1, Grass swale along I15	24 in	NW of I15 and Mendocino Drive	4/26/2022		None
27	Far East	Nob Hill Detention 4	Open Channel	Colonial drive south of Nob Hill Lift station	4/26/2022		None
28		Aspen Meadows Detention	84 inch	Alice street East of Crossroads Pkwy	4/26/2022		None
29		Grass channel, small basin at culvert inlet	2-24 inch	Crossroads Pkwy and Prospect Ave (highway 12)	4/26/2022		None
30		West Aspen Meadows Retention	24 inch	Alice street East of Cascade Ave	4/26/2022		None
31		East Aspen Meadows Retention	42 inch	Twilight and Stillwater streets	4/26/2022		None
32		East Aspen Meadows Retention	12 inch	Runkle Pkwy between Still water and Alpine View	4/26/2022	2023	None
33		Open Channel for 700ft	12 inch	Runkle Pkwy and Highway 282	4/26/2022		None
34		Aspen Meadows Detention North and South	36 inch	Highway 282 south of Runkle Parkway	4/26/2022		None

Appendix E. MCM 4

2025 Construction Site Inspections

Location	Date			Employee	Result	Comments
	Received	Initial Response	Resolution			
431 S Alice St	11/19/2025	11/19/2025	11/20/2025	Liz Petersen and Leea Andersen	Warning Letter Sent	Complaint regarding sediment control on site. Sediment washing down gutters and toward unprotected storm drains. Concrete washout was not located in dedicated area as SWPPP map indicated. SWPPP sign not present on site. SWPPP site maps not well updated across project phases. SWPPP inspection logs indicated BMP updates were needed, but did not appear to be addressed repeatedly over weeks of inspections. A warning letter was sent.

Note: The City of Helena anticipates a higher frequency of construction site inspections in the year 2026. There has been some staff turnover, and long term vacancies filled during the year 2025.

Appendix F. MCM 5

Inventory of Regulated Projects Using Offsite Treatment for Post-Construction Runoff

Project	Address	Geographic Location	Location of Offsite Treatment	Rationale for Approval of Offsite Treatment
Central School	402 N Warren St	46.85945, -112.03552	Nature Park Pond	Safety concerns for students in regards onsite treatment
Bryant School	1520 Livingston Ave	46.59642, -112.01391	Davis Gulch Pond	Safety concerns for students in regards onsite treatment
State of Montana Liquor Warehouse	2517 Airport Rd	46.601857, -111.998553	Helena Regional Detention	Lack of available space, poorly infiltrating soils, and prohibitive costs
1000 E Lyndale Development	1000 E Lyndale	46.598637, -112.022397	K-Mart Ponds, Davis Gulch Pond	Lack of available space, poorly infiltrating soils, and prohibitive costs
MDT Benton Ave RR Crossing and Trail	N Benton Avenue	46.6065 N 112.0414 W	Adjacent vegetated ditches, Capitol HS ponds	Lack of available space, prohibitive costs, a land use that is inconsistent with capture and reuse or infiltration of stormwater onsite. (Roadway/linear trail project)

MCM 5 - LID Plan

Annual Report Section: "***Year 2025 Only:*** Submit a plan to modify relevant codes, ordinances, policies, and/or programs to implement LID/green infrastructure concepts."

The City Engineering Standards currently contain numerous references to LID/green infrastructure concepts. The relevant references from the 2013 City of Helena Engineering and Design Standards are listed below.

4.1.1 – LID section. In general requirements of chapter

- 4.1.1. Low Impact Development (LID)
  Implementation of LID techniques are encouraged for all development and for larger storm runoff as long as they are properly designed. LID can provide substantial cost savings to a development if properly designed and constructed.
  The entire runoff from the water quality storm must infiltrate, evapotranspire, or be captured for reuse for all new development projects meeting the requirements within these engineering standards. Analysis for LID must include completion of post-development runoff calculations and design analysis of the proposed control method.

4.2.1 – Mentioned in design report requirements – describe LID techniques to be used onsite

- Describe the Low Impact Development (LID) techniques to be used onsite and explain why these techniques were chosen. State runoff control and runoff treatment design assumptions. Describe method of analysis. Selection of water quality treatment BMPs must follow the process in HEC-22 Chapter 10.1.

4.5.1 – Runoff control requirements– encouraged to design with LID techniques.

- Runoff control systems shall be designed to promote LID techniques, reduce runoff, maximize reliability, minimize maintenance needs, maximize the distance between the inlet and outlet in order to improve runoff quality, and minimize hazards to persons or property (both on-site and off-site), nuisance problems and risk of failure. LID techniques are generally effective runoff control systems by infiltrating the runoff of retaining it for future uses.

4.5.2 – Discharge Locations – LID. Encourage various techniques including unconcentrated flow, and dispersion etc.

- The purpose of low impact development is to maintain the pre-development stormwater conditions following site development. To accomplish this, LID techniques are generally small and constructed near the source. For those sites/developments where LID techniques are required, the water quality storm must be infiltrated, evapotranspired, or captured for reuse.

4.5.3.5.1 – LID section requiring LID techniques be used/considered first during design of post construction BMPs.

- Low impact development techniques are required for projects requiring completion and approval of a drainage plan. The entire runoff from the water quality storm must infiltrate, evapotranspire, or be captured for reuse. Where it is impracticable to use LID techniques due to soil or other site conditions, a Deviation must be approved by the City Engineer.
- LID design guidelines and considerations are provided by numerous governmental agencies including the USEPA, US Department of Defense (DOD), and various municipalities.
- Approved LID techniques include:
  - Proper site planning and layout
  - Protecting existing vegetation and minimized site disturbance
  - Re-establishing native, drought tolerant plants
  - Bioretention (rain gardens)
  - Soil amendments
  - Rainwater harvesting
  - Infiltration
- In addition, the City is not opposed to the following LID techniques though they may be more difficult to design, construct, and maintain:
  - Permeable paving
  - Vegetated roofs

4.5.4.14 Source Control BMPs section discusses LID treatment methods.

- The goal of source control BMPs is to keep contaminants associated with a development's activities from entering the storm and surface water system rather than removing contaminants (i.e.: runoff treatment later). LID techniques are effective source controls by infiltrating the runoff or retaining it for future uses and preventing it from entering into the storm and surface water system. LID treatment methods are discussed in Section 4.5.3.5. and infiltration is discussed in Section 4.5.4.13.

The City of Helena is also in the process of updating the 2013 Engineering Standards. We are still working on revisions and no significant changes to LID language is proposed.

Stormwater regulations in Helena City Code are located in Title 6, chapter 6. Chapter 6 does not currently contain references to LID or infrastructure. The majority of the design specific requirements are located in the City Engineering Standards as opposed to City Code.

Appendix G. MCM 6

Minimum Control Measure 6: Pollution Prevention/Good Housekeeping for Permittee Operations

The City of Helena (City) operates and maintains permittee owned facilities and conducts activities including training with the intent of reducing pollutant runoff from permittee operations, and ultimately from its MS4 outfalls. Under MCM 6, the General Permit requires permittees to develop and implement an operation and maintenance program that has three primary components:

- An inventory of permittee owned/operated facilities and activities that have the potential to release contaminants to the MS4.
- Standard operating procedures (SOPs) for facilities and activities that identify storm water pollution prevention controls to be installed, implemented and/or maintained to minimize the discharge of pollutants.
- A program to conduct annual storm water pollution prevention training for all permittee staff directly involved with implementing SOPs.

The following sections describe the City's approach to addressing the General Permit's Pollution Prevention/Good Housekeeping requirements.

1.0 Inventory of Permittee Owned/Operated Facilities and Activities

In accordance with Part II.A.5.a.i of the MS4 General Permit, this section provides an inventory of the City's facilities and activities that have the potential to release contaminants to the MS4.

1.1 Facility Inventory

The City's facilities are separated into two categories, Tier 1 and Tier 2 facilities.

- Tier 1 facilities have an increased potential to release contaminants to the MS4 due to the type of pollutants generated or stored at these facilities (e.g., oils, hazardous materials, etc.). Examples of Tier 1 facilities include waste handling areas and vehicle fleet maintenance areas. Tier 1 facilities are identified in Table 1. The City has developed facility-specific storm water pollution prevention SOPs for these facilities.
- Tier 2 facilities have less potential to release contaminants to the MS4 due to the decreased risk of exposure associated with activities taking place at these facilities. Examples of Tier 2 facilities include parks and parking lots. A summary of tier 2 facilities is provided in Table 2 and a comprehensive list is provided in Table A-1 (Appendix A). The City has developed activity-based storm water pollution prevent SOPs for these facilities (the type of activities being conducted at each Tier 2 facility will govern which SOP(s) are to be implemented).

Table 1: Tier 1 City Facilities that have the Potential to Release Contaminants to the MS4

Facility Information		Person Responsible for Pollution Prevention		Potential Contaminants								
Name	Address	Name	Title	Sediment	Nutrients[1]	Trash	Metals	Bacteria	Oil, Grease, Fuel	Organics	Pesticides/Herbicides	Hazardous Waste[2]
Wastewater Treatment Facility	2218 E Custer Ave	Jeff Brown	Superintendent	X	X			X		X		X
Solid Waste Transfer Station	1975 N Benton Ave	Pete Anderson	Superintendent	X	X	X	X	X	X	X	X	X
Utility Maintenance Shop	2218 E Custer Ave	Trent Scheuer	Superintendent	X					X			X
Vehicle Maintenance	3001 East Lyndale Ave	Mark Young	Transportation Engineer	X					X			X
Parks Maintenance Shop	1201 N Ewing St	Craig Marr	Superintendent	X	X				X	X	X	X
Missouri River Water Treatment Plant	2560 Canyon Ferry Rd	Ben Rigby	Superintendent	X					X			X
Ten Mile Water Treatment Plant	1115 Rimini Rd	Ben Rigby	Superintendent	X					X			X

[1] Nutrients in runoff are typically nitrogen and phosphorus pollutants from fertilizers, pet, and yard waste

[2] Hazardous waste is typically any biological, chemical, or physical material that are potentially harmful to human health or the environment. Examples include antifreeze, householder cleaners, and paints.

Table 2. Tier 2 Facility Summary

Facility Information		Person Responsible for Pollution Prevention		Potential Contaminants								
Facility Type	Department	Name	Title	Sediment	Nutrients	Trash	Metals	Bacteria	Oil, Grease, Fuel	Organics	Pesticides/Herbicides	Hazardous Waste
Building	Community Facilities	Troy Sampson	Superintendent	X		X			X			X
Park	Parks/Recreation	Craig Marr	Superintendent	X	X	X			X	X	X	
Open Space	Parks/Recreation	Brad Langsather	Manager	X							X	
Parking Lot	Transportation	Tim Nickerson	Manager	X		X			X			
Parking Garage	Transportation	Tim Nickerson	Manager	X		X			X			
City Streets	Transportation	David Knoepke	Director	X	X	X	X	X	X	X		X
Snow Storage	Transportation	David Knoepke	Director	X		X			X			
Industrial Building	Public Works	Scott Burke	Superintendent	X		X			X			X
Utilities[1]	Public Works	Trent Scheuer	Superintendent	X	X	X	X	X	X	X	X	
Lift Station	Public Works	Ben Rigby	Superintendent		X			X		X		
Storage Tank	Public Works	Ben Rigby	Superintendent									

[1] Water distribution, wastewater collection and conveyance, and storm water collection and conveyance.

1.2 Activity Inventory

Table 3 identifies City activities that have the potential to release contaminants to the MS4. Similar activities have been grouped into ten categories. The City has developed one SOP for each category to describe procedures to be used to minimize the potential discharge of contaminants associated with these activities.

Table 3. City Activities that have the Potential to Release Contaminants to the MS4

SOP Category	Activity	Potential Pollutants								
		Sediment	Nutrients	Trash	Metals	Bacteria	Oil, Grease, Fuel	Organics	Pesticides/Herbicides	Hazardous Waste
Landscaping	Mowing						X	X		
	Tree Trimming						X	X		
	Fertilizer/pesticide/herbicide application		X						X	
	Planting	X								
	Equipment fueling						X			
Irrigation	Applying water	X	X							
Street Maintenance and Repairs	Street sweeping	X	X	X	X	X	X		X	
	Chip sealing	X					X			
	Asphalt and concrete cutting	X					X			
	Asphalt and concrete resurfacing	X					X			
	Curb and crosswalk painting						X			X
	Pothole repair						X			
Winter Street Operations	Street sanding	X					X			
	Snow removal and storage	X		X			X			
	Street deicing						X			X
Parking Lot Maintenance	Sweeping/cleaning	X	X	X	X	X	X		X	
	Parking lot striping						X			X
	Snow removal and storage	X		X			X			
Utility Maintenance	Water line repairs	X					X			
	Water line flushing	X					X			
	Sanitary sewer line repairs	X	X			X	X	X		
	Storm sewer line repairs	X					X			
	Catch basin cleaning	X	X	X	X	X	X	X	X	
	Excavation and stockpiles	X					X			
Solid Waste Management	Dumpster and receptacle management		X	X	X	X	X	X		X
	Solid waste collection		X	X	X	X	X	X		X
Building Maintenance	Sidewalk snow removal	X		X			X			
	Dumpster and receptacle management		X	X	X	X	X	X		X
Shop and Fleet Services	Vehicle fueling						X	X		
	Vehicle and equipment storage						X			X
	Vehicle washing	X					X			
	Materials storage						X			X
	Vehicle maintenance						X			X
Spills	Spill response and containment			X		X	X	X	X	X

Table 4 identifies applicable SOPs implemented for Tier 2 facilities. A comprehensive list of Tier 2 facilities is provided in Table A-1 (Appendix A).

Table 4. SOPs for Tier 2 Facilities

Facility Information		Applicable SOPs									
Tier 2 Facility Type	**Department Responsible for Pollution Prevention**	Landscaping	Irrigation	Street Maintenance and Repairs	Winter Street Operations	Parking Lot Maintenance	Utility Maintenance	Solid Waste Management	Building Maintenance	Shop and Fleet Services	Spills
Building	Community Facilities and Public Works	X	X			X		X	X		X
Park	Parks/Recreation	X	X			X					
Open Space	Parks/Recreation	X	X								
Parking Lot	Transportation					X					X
Parking Garage	Transportation					X					X
City Streets	Transportation			X	X						X
Snow Storage	Transportation				X						
Utilities	Public Works						X				X
Lift Station	Public Works										X
Storage Tank	Public Works										

1.3 SOP Development

The City has two categories of storm water pollution prevention SOPs: facility-specific and activity-based. The list of SOPs developed is provided in Table 5.

Table 5. Storm Water Pollution Prevention SOPs

	SOP Name
Facility-Based SOPs (Tier 1 Facilities)	Wastewater Treatment Facility
	Solid Waste Transfer Station
	Utility Maintenance Shop
	Vehicle Maintenance Facility
	Parks Maintenance Shop
	Missouri River Water Treatment Plant
	Ten Mile Water Treatment Plant
Activity-Based SOPs (Tier 2 Facilities)	Landscaping
	Irrigation
	Street Maintenance and Repairs
	Winter Street Operations
	Parking Lot Maintenance
	Utility Maintenance
	Solid Waste Management
	Building Maintenance
	Shop and Fleet Services
	Spills

Appendix I. City Storm Water Ordinance

ORDINANCES OF THE CITY OF HELENA, MONTANA

ORDINANCE NO. 3120

AN ORDINANCE PROHIBITING ILLEGAL DISCHARGES AND CONNECTIONS TO THE MUNICIPAL SEPARATE STORM SEWER SYSTEM, AND REGULATING CONSTRUCTION AND POST CONSTRUCTION ACTIVITIES BY AMENDING CHAPTER 6 OF TITLE 6 OF THE HELENA CITY CODE

NOW, THEREFORE, BE IT ORDAINED BY THE COMMISSION OF THE CITY OF HELENA, MONTANA:

That Title 6, Public Utilities, of the Helena City Code is hereby amended by repealing Chapter 6, Storm Water Utility, in its entirety and adopting this new Chapter 6, Storm Water Control.

CHAPTER 6

STORM WATER CONTROL

SECTION:

CHAPTER 6

STORMWATER CONTROL

SECTION:

6-6-1: TITLE:

This chapter may be cited as the *HELENA STORMWATER CONTROL CHAPTER*. (Ord. 3120, 12-21-2009)

6-6-2: PURPOSE:

The purpose of this chapter is to provide for the health, safety, and general welfare of the citizens of the city of Helena by protecting water quality through the regulation of nonstormwater discharges to the stormwater drainage system to the maximum extent practicable as required by federal and state law. This chapter establishes methods for controlling the introduction of pollutants into the municipal separate storm sewer system (MS4) in order to comply with requirements of the Montana pollutant discharge elimination system (MPDES) permit process. The objectives of this chapter are:

A. To regulate the contribution of pollutants to the municipal separate storm sewer system from stormwater discharges by any user.

B. To prohibit illegal connections to and discharges into the municipal separate storm sewer system.

C. To establish legal authority to carry out all inspection, surveillance, and monitoring procedures necessary to ensure compliance with this chapter.

D. To establish legal authority to develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects. (Ord. 3120, 12-21-2009)

6-6-3: DEFINITIONS:

For purposes of this chapter, the following definitions apply:

BEST MANAGEMENT PRACTICES (BMPs): Schedules of activities, prohibitions of practices, general good housekeeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to stormwater, receiving waters, or stormwater conveyance systems. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials storage.

CONSTRUCTION ACTIVITY: Development and redevelopment projects resulting in any land disturbance including, but not limited to, clearing and grubbing, grading, excavating, and demolition.

DEPARTMENT: City of Helena public works department.

DETENTION/RETENTION BASINS: A normally dry area designed to capture and hold stormwater. The stormwater may be captured and released at a uniform rate after the storm peak flow has passed (detention) or the stormwater may be held for evaporation or infiltration into the ground and not released at all (retention).

DISCHARGE: Any direct or indirect nonstormwater discharge to the storm drain system.

HAZARDOUS MATERIALS: Any material, including any substance, waste, or combination thereof, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, a substantial present or potential hazard to human health, safety, property, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed. This includes materials defined as hazardous by the United States environmental protection agency and the Montana department of environmental quality.

ILLEGAL CONNECTIONS: Any drain or conveyance, whether on the surface or subsurface, which allows an illegal discharge to enter the storm drain system including, but not limited to, any conveyances that allow any nonstormwater discharge, including sewage, processed wastewater, and wash water to enter the storm drain system, and any connections to the storm drain system from indoor drains and sinks, regardless of whether said drains or connections had been previously allowed, permitted, or

approved by the department, or any drain or conveyance connected from a commercial or industrial land use to the storm drain system which has not been documented in plans, maps, or equivalent records, and approved by the department.

INDUSTRIAL ACTIVITY: Activities subject to MPDES industrial permits as defined in 40 CFR, section 122.26(b)(14).

MS4: The municipal separate storm sewer system including stormwater drainage facilities and system.

MANMADE DRAINAGEWAY: An open channel designed to carry stormwater.

MONTANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (MPDES) STORMWATER DISCHARGE PERMIT: A permit issued by the Montana department of environmental quality that authorizes the discharge of pollutants to surface waters of the United States, whether the permit is applicable on an individual, group, or general areawide basis. Also includes permits issued by the United States environmental protection agency.

NATURAL DRAINAGEWAY: A recognizable drainage which has historically carried storm or runoff water. The drainageway may still be in its native state or may be partially or totally encroached upon. The limits of the drainageway are considered to be the outermost area of flow for the design storm or the prescribed easement for the drainageway.

NONSTORMWATER DISCHARGE: Any discharge to the storm drain system that is not composed entirely of stormwater.

PERSON: Any individual, association, organization, partnership, firm, corporation or other entity recognized by law.

POLLUTANT: Anything which causes or contributes to pollution. Pollutants may include, but are not limited to, paints, varnishes, and solvents; oil and other automotive fluids; nonhazardous liquid and solid wastes; and refuse, rubbish, garbage, litter, or other discarded or abandoned objects and accumulations, so that same may cause or contribute to pollution; floatables; pesticides, herbicides, and fertilizers; hazardous materials and wastes; sewage, fecal coliform, and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing a building or structure; and noxious or offensive matter of any kind.

PREMISES: Any building, lot, parcel of land, or portion of land, whether improved or unimproved, including adjacent sidewalks and parking strips.

STORM DRAINAGE SYSTEM OR FACILITIES: City owned or controlled facilities that are part of the MS4 by which stormwater is collected or conveyed, including, but not limited to, any roads with drainage systems, municipal streets, gutters, curbs, inlets, piped storm drains, pumping facilities, retention and detention basins, natural and humanmade or altered drainage channels, reservoirs, and other drainage structures.

STORMWATER: Any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

STORMWATER POLLUTION PREVENTION PLAN: A written document which describes the best management practices and activities to be implemented by a person to identify sources of pollution or contamination at a site, and the actions to eliminate or reduce pollutant discharges to stormwater, stormwater conveyance systems, or receiving waters to the maximum extent practicable.

STORMWATER UTILITY: A funding mechanism for maintenance and operation of, as well as capital improvements to, the stormwater drainage system. The utility is a user fee charged equitably to all property within the service area which benefits from the utility.

WASTEWATER: Any water or other liquid, other than uncontaminated stormwater, discharged from a facility. (Ord. 3120, 12-21-2009)

6-6-4: APPLICABILITY:

This chapter applies to all water entering the city's separate stormwater system that is generated on any developed and undeveloped land. (Ord. 3120, 12-21-2009)

6-6-5: STORMWATER UTILITY SERVICE AREA:

The stormwater utility service area is inclusive of all premises annexed to the city and bounded by the incorporated city limits as the same may be adjusted by the city commission.

The city reserves the right to plan for drainage improvements outside the service area. The city may also construct storm drainage improvements out of the service area when needed as an integral part of the storm drain facilities located within the service area. (Ord. 3120, 12-21-2009)

6-6-6: RESPONSIBILITY FOR ADMINISTRATION:

The department shall administer, implement, and enforce the provisions of this chapter. Any powers granted or duties imposed upon the department may be delegated by the department to persons or entities acting in the beneficial interest of or in the employ of the city. (Ord. 3120, 12-21-2009)

6-6-7: COOPERATION WITH THE COUNTY:

The city shall, in all ways and within the limits of its powers, solicit the county to cooperate in providing drainage facilities in stormwater basins, or parts thereof, extending outside the city and, in general, to carry out the drainage plan developed therein. (Ord. 3120, 12-21-2009)

6-6-8: STORM DRAINAGE MASTER PLAN:

The storm drainage master plan prepared by Stahley and Wright-McLaughlin Engineers and dated April 9, 1980, as well as the application updates of the Davis Gulch Basin dated May 1985, prepared by Robert Peccia and Associates, and the updates of the Last Chance Gulch Basin, Bull Run Basin and West Area Basin prepared by Stahley Engineering and Associates, dated May 1989, are hereby adopted by reference and declared to be part of this chapter. The plans are on file in the office of the city engineer. The city may adopt additional master drainage plan updates by reference and declare them to be a part of this chapter, and copies of such master drainage plan updates shall be on file in the office of the city engineer. Modifications of the plans may be initiated by the department and submitted to the city commission for approval. Approved modifications are to be filed in the office of the city engineer. (Ord. 3120, 12-21-2009)

6-6-9: ULTIMATE RESPONSIBILITY:

The standards set forth herein and promulgated pursuant to this chapter are minimum standards; therefore, this chapter does not intend nor imply that compliance by any person will ensure that there will be no contamination, pollution, or unauthorized discharge of pollutants. (Ord. 3120, 12-21-2009)

6-6-10: PROHIBITION OF ILLEGAL DISCHARGES:

A. A person may not discharge or cause to be discharged into the MS4 any materials, including, but not limited to, pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards or that could cause the city to be in violation of its MPDES phase II permit, other than stormwater. Any such prohibited discharge is an illegal discharge.

B. The commencement, conduct, or continuance of any illegal discharge to the MS4 is prohibited except as follows:

1. Water line flushing or other potable water sources, landscape irrigation or lawn watering, diverted stream flows, rising groundwater, groundwater infiltration to storm drains, uncontaminated and pumped groundwater, foundation or footing drains (not including active groundwater dewatering systems), springs, noncommercial washing of vehicles, natural riparian habitat or wetland flows, firefighting activities, routine

street and utility maintenance, including chip sealing and spreading of gravel and other materials necessary to provide safe streets, and any other water source not containing pollutants;

2. Discharges specified in writing by the department as being necessary to protect public health and safety;

3. Any nonstormwater discharge permitted under an MPDES permit, waiver, or waste discharge order issued to the discharger and administered under the authority of the federal environmental protection agency, provided that the discharger is in full compliance with all requirements of the permit, waiver, or order and other applicable laws and regulations, and provided that written approval has been granted for any discharge to the storm drain system; and

4. Other nonstormwater discharges which are not a source of pollutants to the city's MS4 or waters of the United States and are exempted in writing by the department.

C. It is unlawful to introduce hazardous materials into any drainage system. The originator of any hazardous material spill or introduction is responsible for the material, and shall pay all applicable investigation and cleanup costs, including the cost of equipment, materials, staff time with fringes, and consultant charges.

D. The city may use available and reasonable testing to identify the source of an illegal discharge including, but not limited to, visual inspections, sample collection and testing, dye testing, and smoke testing. (Ord. 3120, 12-21-2009)

6-6-11: DRAINAGEWAY PROTECTION:

A. It is unlawful to encroach upon natural or manmade drainageways with:

1. Temporary or permanent structures not approved by the city manager; or

2. Fill material or other material obstructing or restricting natural stormwater flow.

B. Natural or manmade drainageways may be altered under the supervision of, and upon application to, the department under the following circumstances:

1. A roadway crossing, provided drainage is considered in the design and culverts are designed to handle proper flow as specified in the master plan and updates, or bridges are designed such that the opening is adequate;

2. Improvements such as detention basins; and

3. Slope improvements.

All improvements or changes to drainageways must be designed by a registered professional engineer and submitted for approval to the department. Approval must be obtained before any on site work commences. (Ord. 3120, 12-21-2009)

6-6-12: PROHIBITION OF ILLEGAL CONNECTIONS:

A. The construction, use, maintenance or continued existence of illegal connections to the storm drain system is prohibited.

B. This prohibition expressly includes, without limitation, illegal connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.

C. A person who wishes to connect to the MS4 shall obtain permission from the department to install the connection in accordance with city engineering standards. (Ord. 3120, 12-21-2009)

6-6-13: SUSPENSION OF MS4 ACCESS:

A. The department may, without prior notice, suspend MS4 discharge access to a person when such suspension is necessary to stop an actual or threatened discharge which presents or may present imminent and substantial danger to the environment, or to the health or welfare of persons, or to the MS4 or waters of the United States. If the violator fails to comply with a suspension order issued in an emergency, the department may take such steps as deemed necessary to prevent or minimize damage to the MS4 or waters of the United States, or to minimize danger to persons.

B. A person discharging to the MS4 in violation of this chapter may have their MS4 access terminated if such termination would abate or reduce an illegal discharge. The department will notify a violator of the proposed termination of its MS4 access. The violator may petition the department for a reconsideration and hearing.

C. A person commits an offense if the person reinstates MS4 access to premises terminated pursuant to this section, without the prior approval of the department. (Ord. 3120, 12-21-2009)

6-6-14: MONITORING OF DISCHARGES:

A. This section applies to all facilities that have stormwater discharges including construction activity.

B. The department is permitted to enter and inspect MS4 facilities subject to regulation under this chapter as often as may be necessary to determine compliance with this chapter. If a discharger has security measures in force which require proper identification and clearance before entry into its premises, the discharger shall make the necessary arrangements to allow access to representatives of the department.

C. Facility operators shall allow the department ready access to all parts of the premises for the purposes of inspection, sampling, examination and copying of records that must be kept under the conditions of an MPDES permit to discharge stormwater, and the performance of any additional duties as defined by state and federal law.

D. The department has the right to set up on any permitted facility such devices as are necessary in the opinion of the department to conduct monitoring or sampling of the facility's stormwater discharge.

E. The department has the right to require the discharger to install monitoring equipment as necessary. The facility's sampling and monitoring equipment must be maintained at all times in a safe and proper operating condition by the discharger at its own expense. All devices used to measure stormwater flow and quality must be calibrated to ensure their accuracy.

F. Any temporary or permanent obstruction to safe and easy access to the facility to be inspected or sampled must be promptly removed by the operator at the written or oral request of the department and may not be replaced. The cost of clearing such access is borne by the operator.

G. Unreasonable delay in allowing the department access to a permitted facility is a violation of a stormwater discharge permit and of this chapter. A person who is the operator of a facility with an MPDES permit to discharge stormwater associated with industrial activity commits an offense if the person denies the department reasonable access to the permitted facility for the purpose of conducting any activity authorized or required by this chapter.

H. If the department has been refused access to any part of the premises from which stormwater is discharged, and it is able to demonstrate probable cause to believe that there may be a violation of this chapter, or that there is a need to inspect or sample as part of a routine inspection and sampling program designed to verify compliance with this chapter or any order issued hereunder, or to protect the overall public health, safety, and welfare of the community, then the city may seek issuance of a court order from any court of competent jurisdiction. (Ord. 3120, 12-21-2009)

6-6-15: DEVELOPMENT AND REDEVELOPMENT ACTIVITY AND POSTCONSTRUCTION STORMWATER CONTROL:

A. A construction activity stormwater permit is required for construction activity that disturbs one acre or more, including projects disturbing less than one acre that are part of a larger common plan of development, redevelopment, or sale. A permit may only be issued subsequent to a properly submitted and reviewed permit application, pursuant to this section.

B. An owner or developer of land required to obtain a construction activity stormwater permit must submit an executed copy of the state standard notice of intent ("NOI") and a stormwater pollution prevention plan prepared and stamped by a licensed professional engineer prior to performing any construction activity.

C. A construction activity stormwater permit will require erosion and sediment controls through the design, installation, and construction of stormwater management and control practices on the permitted construction site including structural BMPs and elements of site design for construction stormwater management other than structural BMPs.

D. The permittee is required to perform regularly scheduled construction activity site inspections at least every fourteen (14) calendar days and within twenty four (24) hours of a precipitation event to ensure that all BMPs have been constructed and are functioning properly. The permittee must document all inspections in writing and make inspection records available to the department for review.

E. Commencement of construction work on development or redevelopment projects that disturbs one acre or more, including projects disturbing less than one acre that are part of a larger common plan of development, may not begin until such time as a permit is issued and final approval of the drainage plan if required below is obtained in accordance with this chapter.

F. Any person subject to a construction activity MPDES stormwater discharge permit shall comply with all provisions of such permit. Proof of compliance with said permit may be required in a form acceptable to the department prior to the allowing of discharges to the MS4.

G. In order to address postconstruction stormwater runoff, all owners or developers of property that are required to submit a drainage plan shall provide the stormwater facilities necessary for the drainage and control of flood and surface waters within stormwater basins and shall provide the facilities required to convey such waters from the stormwater basin to major drainageways. The cost of installing stormwater facilities in the service area is charged in whole or in part against the property in the service area.

H. All owners or developers applying for any of the following permits or approvals shall submit a drainage plan for approval, prepared and stamped by a professional engineer, with the application or request:

1. Major subdivision plat approval;

2. Minor subdivision plat approval;

3. Building permits where the impervious development coverage within the property is five thousand (5,000) or more square feet, or where development is in an area critical to the functioning of the MS4 as determined by the department; and

4. Planned unit development (PUD).

I. The same plan submitted during one permit or approval process may be subsequently submitted with other required applications. The plan must be supplemented with such additional information as may be requested by the department.

J. The drainage plan requirement established in this section applies except when the owner or developer demonstrates to the satisfaction of the department that the proposed use of the property:

1. Will neither seriously nor adversely impact the water quality conditions of any affected receiving bodies of water;

2. Will not alter the surface discharge location, alter the drainage pattern on adjoining properties, alter drainage patterns, increase the discharge, or cause any other adverse effects in the drainage area; and

3. Will not alter the subsurface drainage patterns, flow rates and discharge points, or result in any significant adverse effects to property or residents.

K. Drainage plans shall be prepared by a certified engineer in accordance with current hydraulic hydrology practices and hydrology design standards and shall be consistent with the storm drain master plan. Drainage plans shall consist of drainage calculations and mitigation of stormwater drainage and include contour lines as necessary and explicitly describe the stormwater drainage system, including any required detention areas.

L. All required storm drainage plans must be submitted for review by and approval of the department. At the time of approval of the drainage plan for the subject property, a schedule for inspection of required construction and facilities will be established by the department. (Ord. 3120, 12-21-2009)

6-6-16: CREDIT FOR CONSTRUCTION OF STORM DRAINAGE FACILITIES:

If the department requires an owner or developer to construct stormwater facilities that serve more than that development and are identified in the storm drain master plan, a portion of the actual costs incurred may be eligible for credit from the city's stormwater drainage assessment. To be eligible for credit, prior to final approval of the development agreement, the owner or developer must submit a report to the stormwater utility detailing the proposed improvements and obtain the city's approval of the report. The report must identify all elements of the project eligible for credit and include a detailed project description, a project bid form with estimated quantities, unit prices, engineering design and construction management costs. The report also must provide an accurate quantity and cost delineation between the proposed stormwater improvements necessary to meet the standard requirements of the development. The books and records of the owner or developer relating to the stormwater facilities for which the utility is providing reimbursement must be open to the city at all reasonable times for the purpose of auditing or verifying costs. The department will recommend inclusion of the cost of improvements eligible for credit in the next available budget submitted to the city commission. Upon approval and appropriation by the city commission, such costs will be credited from the storm drainage fund. (Ord. 3120, 12-21-2009)

6-6-17: RESPONSIBILITY FOR ACCEPTED STORMWATER FACILITIES:

All stormwater facilities constructed, installed, or provided hereunder, upon acceptance by the city, are the property of the city and thereafter the city is responsible for the operation and maintenance of the facilities. The city shall maintain all accepted public stormwater facilities located within city owned land, city rights of way and city easements. (Ord. 3120, 12-21-2009)

6-6-18: RESPONSIBILITY FOR PRIVATE STORM DRAINAGE FACILITIES:

Property owners who install private storm drainage facilities that are not connected to the MS4 and not accepted by the city are required to perform maintenance of all private storm drainage facilities to ensure that those facilities function as designed. (Ord. 3120, 12-21-2009)

6-6-19: APPLICABILITY TO GOVERNMENTAL ENTITIES:

All governmental entities are required to submit a drainage plan and comply with the terms of this chapter when developing or improving land including, but not limited to, road construction and reconstruction and other improvements that can affect stormwater runoff within the city. (Ord. 3120, 12-21-2009)

6-6-20: REQUIREMENT TO USE BEST MANAGEMENT PRACTICES:

The department will adopt requirements identifying BMPs for any activity, operation, or facility which may cause or contribute to pollution or contamination of stormwater, the storm drain system, or waters of the U.S. The owner or operator of a commercial or industrial establishment shall provide, at the owner's own expense, reasonable protection from the accidental discharge of prohibited materials or other wastes into the MS4 or watercourses through the use of these structural and nonstructural BMPs. Further, any person responsible for a property or premises that is or may be the source of an illegal discharge, may be required to implement, at said person's expense, additional structural and nonstructural BMPs to prevent the further discharge of pollutants to the municipal separate storm sewer system. Compliance with all terms and conditions of a valid MPDES permit authorizing the discharge of stormwater associated with industrial activity, to the extent practicable, is deemed compliance with the provisions of this section. Adopted BMPs shall be part of a stormwater pollution prevention plan (SWPPP) as necessary for compliance with requirements of the MPDES permit. (Ord. 3120, 12-21-2009)

6-6-21: NOTIFICATION OF SPILLS:

Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting or may result in illegal discharges or pollutants discharging into stormwater, the storm drain system, or waters of the U.S. that person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials that person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of nonhazardous materials, said person shall notify the department in person or by phone, electronic mail, or facsimile no later than the next business day. Notification in person or by phone must be confirmed by written notice addressed and mailed to the department within three (3) business days of the phone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on site written record of the discharge and the actions taken to prevent its recurrence. Such records must be retained for at least three (3) years. (Ord. 3120, 12-21-2009)

6-6-22: MANAGEMENT OF MUNICIPAL SEPARATE STORMWATER SYSTEM:

A. The purpose of the stormwater utility rates and charges established by the city commission is to generate sufficient revenue to pay all costs for the operation, maintenance, administration and routine functions of the existing MS4 and the operation, maintenance and administration of such future storm drainage facilities as may be established within or without the service area and to pay for the review of drainage plans, and the design, right of way acquisition and construction or reconstruction of stormwater facilities. All of the proceeds are deemed to be in payment for use of the city stormwater system.

B. The department shall determine the total annual cost of operation and maintenance of the stormwater system. The total annual cost of operation and maintenance includes, but is not limited to, labor, repairs, equipment replacement, maintenance, necessary modifications, power, sampling, laboratory tests and a reasonable contingency fund. Capital improvement priorities are determined by the city commission, and utility rates shall be passed in the same manner as all other special assessments. All assessments are set by resolution after public hearing.

C. The city may assess a user fee upon all assessable property within the service area. This charge must appear on yearly property tax statements distributed by the county or by individual billing where necessary. The property owner shall pay the fee directly to the county and the county shall then pay the city the fee in the same manner as all other special fees and assessments. The city reserves the right to pursue further legal action to remedy nonpayment. Nonpayment constitutes a lien on the property, as are other taxes and assessments, in accordance with state law.

D. The rates, charges, and rentals are deemed prima facie fair, reasonable, and equitable. In any case where any contention is made that the rates are unfair, inequitable, or unreasonable, the party objecting

thereto shall apply to the city, stating the facts and grounds of the complaint, and the city shall investigate and report with recommendations to the city commission. The city shall consider each and every such complaint and report, and communicate such findings in respect thereto to the city commission within one month after the filing of each such complaint. The city commission has the right to order public hearings as to any such matter and, if convinced that an adjustment of stormwater utility rates or charges for such lot or parcel of land is necessary to provide equality with those charged to others, it shall so provide. (Ord. 3120, 12-21-2009)

6-6-23: VIOLATIONS AND CIVIL ENFORCEMENT:

A. Whenever the department finds that a person has violated a prohibition or failed to meet a requirement of this chapter, the department may order compliance by written notice of violation to the responsible person. Such notice may require without limitation:

1. The performance of monitoring, analyses, and reporting;

2. The elimination of illegal connections or discharges;

3. That violating discharges, practices, or operations shall cease and desist;

4. The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property;

5. Payment of restitution for remediation costs;

6. The implementation of source control or treatment BMPs; and

7. The cessation of any construction or postconstruction work not permitted according to this chapter.

B. If abatement of a violation or restoration of affected property is required, the notice will set forth a deadline within which such remediation or restoration must be completed. Said notice will further advise that, should the violator fail to remediate or restore within the established deadline, the work may be done by the city and the expense thereof may be levied against the real property of the violator.

C. If the violation has not been corrected pursuant to the requirements set forth in the notice of violation, then the department may enter upon the subject private property and is authorized to take any and all measures necessary to abate the violation or restore the property. The total cost thereof may be assessed against the real property of the violator in the same manner as a property tax. It is unlawful for any person, owner, agent or person in possession of any premises to refuse to allow the department or designated contractor to enter upon the premises for the purposes set forth above. (Ord. 3120, 12-21-2009)

6-6-24: VIOLATIONS AND CRIMINAL ENFORCEMENT:

Violations of this chapter may also subject the violator to a fine in any sum not to exceed five hundred dollars ($500.00), or imprisonment in the county jail for a period not to exceed thirty (30) days, or both such fine and imprisonment. The department may recover all attorney fees, court costs, and other expenses associated with enforcement of this chapter, including sampling and monitoring expenses. (Ord. 3120, 12-21-2009)

6-6-25: INJUNCTIVE RELIEF:

It is unlawful for any person to violate any provision or fail to comply with any of the requirements of this chapter. If a person has violated or continues to violate the provisions of this chapter, the city may petition for a preliminary or permanent injunction restraining the person from activities which would create further violations or compelling the person to perform abatement or remediation of the violation. (Ord. 3120, 12-21-2009)

6-6-26: REMEDIES NOT EXCLUSIVE:

The remedies listed in this chapter are not exclusive of any other remedies available under any applicable federal or state law, and it is within the discretion of the city to seek cumulative remedies. (Ord. 3120, 12-21-2009)

Appendix J. Supplemental Forms and Checklists

Construction SWPPP Review Checklist

Section 1: Administrative Information

1. **Project File NO:**
2. **Project Name: Pioneer Technical Services Proposed Office Building**
3. **Applicant Name, Address, Phone Number:**
4. **Owner Name, Address, Phone Number: Same as Applicant**
5. **Appears to Meet DEQ Requirements:** ☐ Yes ☐ No
6. **Comments Provided:** ☐ Yes ☐ No
7. **Reviewer:**
8. **Date Reviewed:**

Notes:

Section 2: NOI-SWC Section A: NOI Status

☐Yes ☐No

Comments: Click or tap here to enter text.

Section 3: NOI-SWC Section B: Facility or Site Information

1. **Site Name:** ☐Yes ☐No
2. **Site Physical Address:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 4: NOI-SWC Section C: Applicant Information

1. **Applicant Name:** ☐Yes ☐No
2. **Applicant Address:** ☐Yes ☐No
3. **Facility Site Contact:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 5: NOI-SWC Section D: Existing or Pending Permits, Certifications, or Approvals

1. **MPDES:** ☐Yes ☐No
2. **UIC #:** ☐Yes ☐No
3. **Plat Approval EQ #:** ☐Yes ☐No
4. **404 Permit (dredge & fill):** ☐Yes ☐No
5. **MGWPCS #:** ☐Yes ☐No
6. **Other:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 6: NOI-SWC Section D: Local Sediment and Erosion Control Requirements

1. **MS4 Recognition:** ☐Yes ☐No
2. **MS4 Contact:** ☐Yes ☐No
3. **Sage Grouse Habitat:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 7: NOI-SWC Section E: Nature of Business

1. **Brief Description:** ☐Yes ☐No
2. **SIC Codes:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 8: NOI-SWC Section F: SWPPP Preparer and Administrator(s)

1. **SWPPP Preparer:** ☐Yes ☐No
2. **SWPPP Administrator (1):** ☐Yes ☐No
3. **SWPPP Administrator (2):** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 9: NOI-SWC Section G: Receiving Surface Water(s)

1. **Receiving Water Information:** ☐Yes ☐No
2. **USGS Map:** ☐Yes ☐No
3. **Receiving Water Impairment Information:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 10: NOI-SWC Section H: Describe the Construction Activity or Project

1. **Description:** ☐Yes ☐No
2. **Total Project Area:** ☐Yes ☐No
3. **Total Disturbance Area:** ☐Yes ☐No
4. **Start Date:** ☐Yes ☐No
5. **Completion Date:** ☐Yes ☐No
6. **Final Stabilization:** ☐Yes ☐No

Comments: Dates need to be updated for current Schedule

Section 11: NOI-SWC Supplemental Information: Certification

1. **Signatory:** ☐Yes ☐No

Section 12: SWPPP Section A: SWPPP Status

1. **SWPPP Status:** ☐Yes ☐No
2. **Matches NOI-SWC:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 13: SWPPP Section B: Facility or Site Information

1. **Site Name:** ☐Yes ☐No
2. **Site Physical Address:** ☐Yes ☐No
3. **Matches NOI-SWC:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 14: SWPPP Section C: Applicant Information

1. **Applicant Name:** ☐Yes ☐No
2. **Applicant Address:** ☐Yes ☐No
3. **Matches NOI-SWC:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 15: SWPPP Section D: SWPPP Preparer and Administrator(s)

1. **SWPPP Preparer:** ☐Yes ☐No
2. **SWPPP Administrator (1):** ☐Yes ☐No
3. **SWPPP Administrator (2):** ☐Yes ☐No

Section 16: SWPPP Section E: Site Description (General Permit 3.3)

1. **Part 1: Activity Nature:** ☐Yes ☐No
2. **Part 2: Support Activities:** ☐Yes ☐No
3. **Part 3: Site Areas:** ☐Yes ☐No
   a. Matches NOI-SWC: ☐Yes ☐No
4. **Part 4: Soils:** ☐Yes ☐No
5. **Part 5: Vegetation:** ☐Yes ☐No
6. **Part 6: Runoff Patterns:** ☐Yes ☐No
7. **Part 7: Outfall Table:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 17: SWPPP Section F: Identification and Summary of Potential Pollutant Sources (General Permit 3.4)

1. **Soils:** ☐Yes ☐No
2. **Activities:** ☐Yes ☐No
3. **Materials:** ☐Yes ☐No
4. **Additional Pollutants:** ☐Yes ☐No
5. **Non-Stormwater Discharges:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 18: SWPPP Section G: Technology-Based Effluent Limitations (General Permit Part 2.1) SWPPP Plan Includes:

1. **Complete implementation and installation of BMPs before or at the start of each major construction activity.**
   ☐Yes ☐No
2. **Minimize erosion within the construction project area.**
   ☐Yes ☐No
3. **Divert stormwater runoff from disturbed areas to sediment removal BMPs.**
   ☐Yes ☐No
4. **Minimize sediment discharges from the construction project area.**
   ☐Yes ☐No
5. **Minimize erosion at outlets and conveyance channels.**
   ☐Yes ☐No
6. **Protect all storm drain inlets.**
   ☐Yes ☐No
7. **Manage and minimize vehicle/equipment entrances and exits to the construction project area.**
   ☐Yes ☐No
8. **Stabilize ditches, swales, channels, and outlets.**
   ☐Yes ☐No
9. **Construct stormwater retention and detention facilities during initial site grading activities.**

☐Yes ☐No

10. **Provide surface outlets for retention and detention facilities for active construction, and discharge the highest quality water from the facility.**
    ☐Yes ☐No
11. **Protect infiltration facilities from sedimentation during active construction.**
    ☐Yes ☐No
12. **Limit areas of disturbance and soil exposure.**
    ☐Yes ☐No
13. **Provide a natural buffer within the construction project area.**
    ☐Yes ☐No
14. **Design and construct cut-and-fill slopes to minimize erosion.**
    ☐Yes ☐No
15. **Divert off site stormwater or groundwater away from slopes and disturbed areas.**
    ☐Yes ☐No
16. **Prevent stormwater run on from impacting sediment removal BMPs.**
    ☐Yes ☐No
17. **Maintain natural buffers around state waters.**
    ☐Yes ☐No
18. **Direct stormwater runoff to vegetated areas.**
    ☐Yes ☐No
19. **Mark and maintain clearing limits before disturbing soils and during construction activities.**
    ☐Yes ☐No
20. **Preserve topsoil.**
    ☐Yes ☐No
21. **Control ground water, surface water, and/or accumulated stormwater dewatering activities to prevent discharges to state waters.**
    ☐Yes ☐No
22. **Obtain authorization under the construction Dewatering General Permit prior to discharge of dewatering effluent to state surface waters.**
    ☐Yes ☐No
23. **Provide cover, containment, and protection for all chemicals and liquids, petroleum products, and construction materials, products, and wastes.**
    ☐Yes ☐No
24. **Use spill prevention and control measures for vehicle maintenance and fueling.**
    ☐Yes ☐No
25. **Maintain appropriate spill kits and clean up spills and leaks immediately.**
    ☐Yes ☐No
26. **Prevent discharge of equipment wash waters and clean out wastes, and designate these activities away from the state waters and their conveyances.**
    ☐Yes ☐No
27. **Prevent discharge of concrete products.**
    ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 19: SWPPP Section H: Major Construction Activity and BMP Phasing (General Permit Part 3.7)

1. **Total Number of Activities:** ☐Yes ☐No
2. **Major Construction Activity Schedule:** ☐Yes ☐No
3. **Do BMPs match those listed in SWPPP Section G:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 20: SWPPP Section I: Final Stabilization (General Permit Part 3.8)

1. **Temporary Stabilization (areas inactive for 14-days):** ☐Yes ☐No
2. **Final Stabilization:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 21: SWPPP Section J: Post Construction Stormwater Management (General Permit Part 3.9)

1. **BMP Description:** ☐Yes ☐No
2. **Local Flood Control and Water Quality Conditions:** ☐Yes ☐No
3. **Transition and Maintenance Plan:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 22: SWPPP Section K: Site Map (General Permit Part 3.10)

1. **Site boundaries:** ☐Yes ☐No
2. **Locations and types of activities:** ☐Yes ☐No
3. **Location of ground-disturbing activities:** ☐Yes ☐No
4. **Phasing of major construction activities:** ☐Yes ☐No
5. **Preconstruction topography:** ☐Yes ☐No
6. **State surface waters:** ☐Yes ☐No
7. **Drainage patterns and stormwater flow directions:** ☐Yes ☐No
8. **Stormwater discharge locations:** ☐Yes ☐No
9. **Municipal storm sewer infrastructure:** ☐Yes ☐No
10. **Project run-on:** ☐Yes ☐No
11. **Cut and fill areas:** ☐Yes ☐No
12. **Undisturbed locations:** ☐Yes ☐No
13. **Slope changes pre and post construction:** ☐Yes ☒No
14. **Stockpile locations:** ☐Yes ☐No
15. **Fueling and washing areas:** ☐Yes ☐No
16. **Concrete washout areas:** ☐Yes ☐No
17. **Dewatering activities:** ☐Yes ☐No
18. **Entry and exit points:** ☐Yes ☐No
19. **BMPs detailed in SWPPP Section G:** ☐Yes ☐No
20. **Post construction site conditions:** ☐Yes ☐No
21. **Public Sign:** ☐Yes ☐No
22. **Map scale, north arrow, and legend:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 23: SWPPP Section L: Inspection and BMP Maintenance Procedures (General Permit Part 3.11)

1. **Frequency:** ☐Yes ☐No
2. **Description:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 24: SWPPP Section M: Water Quality Controls for Discharges to Impaired Waterbodies (General Permit Part 2)

1. **Description:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 25: SWPPP Section N: Miscellaneous

1. **Description:** ☐Yes ☐No

Comments: Click or tap here to enter text.

Section 26: SWPPP Section O: Certification

1. **Signatory:** ☐Yes ☐No
2. **Matches NOI-SWC:** ☐Yes ☐No

CONSTRUCTION SITE VISIT INSPECTION FORM

General Information

Project Name: Click or tap here to enter text.

Location: Click or tap here to enter text.

Date of Inspection: 9/8/2022	Start Time: Click or tap here to enter text.	End Time:Click or tap here to enter text.

Inspector's Name(s):Click or tap here to enter text.

Inspector's Title(s):Click or tap here to enter text.

Inspector's Contact Information (phone):Click or tap here to enter text.

Describe Present Phase of Construction:Click or tap here to enter text.

Type of Inspection:

☐ Beginning of Construction ☐ Pre-storm event ☐ During rain event

☐ Post-rain event ☐ Conclusion of Project ☐ Response to violation or complaint

Weather Information

Has it rained since the last inspection? ☐ Yes ☐ No ☐ N/A

If yes, provide:

Storm Start Date & Time: Click or tap here to enter text. Storm Duration (hrs): Click or tap here to enter text. Approximate Rainfall (in):Click or tap here to enter text.

Weather at time of this inspection:

☐ Clear ☐ Cloudy ☐ Raining ☐ Sleet ☐ Fog ☐ Snowing ☐ High Winds

☐Other:Click or tap here to enter text. Temperature (F):Click or tap here to enter text.

Do you suspect that discharges may have occurred since the last inspection?

☐Yes ☐ No ☐ N/A

Are there any stormwater discharges at the time of inspection? ☐Yes ☐ No

If yes, provide location(s) and a description of stormwater discharged from the site (presence of suspended sediment, turbid water, discoloration, and/or oil sheen: Click or tap here to enter text.

Prohibited Discharges

Are there any prohibited discharges at the time of inspection? ☐Yes ☐ No

If yes, provide location(s) and a description: Click or tap here to enter text.

BMP/Activity		Implemented?	Maintained?	Corrective Action Needed & Notes
Erosion and Sediment Controls 2.1.1				
a.)	Is storm water volume and velocity being controlled to minimize soil erosion?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
i.)	Were BMPs selected and designed that address:			
	The amount, frequency, intensity, and total duration of precipitation?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
	The quantity and quality of storm water runoff including peak flow rates and total water volume?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
	The soil characteristics for the construction project area(s) including the range of the soil particles sizes expected to be present on the site?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
	The timeframes the construction project will be completed?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
ii.)	Are all BMPs implemented and installed in accordance with good engineering practices and design specifications?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
iii.)	Has the installation and implementation of BMPs been completed before or at the start of each major construction activity?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
iv.)	Has erosion within the construction project area been minimized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
v.)	Is storm water runoff from disturbed areas being diverted to sediment removal BMPs?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
vi.)	Are sediment discharges from the construction project area being minimized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.

vii.)	Are BMPs being maintained in an effective operating condition?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
b.)	Are storm water discharges being controlled?	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.
i.)	Is erosion at outlets and conveyance channels being minimized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
ii.)	Are storm drain inlets being protected?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
iii.)	Are vehicle/equipment entrances and exits to the construction project area being managed and minimized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
iv.)	Are ditches, swales, channels, and outlets stabilized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
v.)	Have storm water retention and detention facilities been constructed during initial site grading activities?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
vi.)	Have surface outlets for retention and detention facilities been provided for active construction and is the highest quality of water being discharged from the facility?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
vii.)	Are infiltration facilities being protected from sedimentation during active construction?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
c.)	Is soil disturbance being minimized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
i.)	Are the areas of disturbance and soil exposure being limited?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
ii.)	Is there a natural buffer within the construction project area?	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.

		☐N/A	☐N/A	
d.)	Is the disturbance of slopes 15% or greater being minimized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
i.)	Have cut-and-fill slopes been constructed and designed to minimize erosion?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
ii.)	Is off site storm water or ground water being diverted away from slopes and disturbed areas?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
iii.)	Is storm water run on being prevented from impacting sediment removal BMPs?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
e.i.)	Have natural buffers around state waters been maintained?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
ii.)	Is storm water runoff being directed to vegetated areas?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
f.)	Is soil compaction being minimized?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
i.)	Have clearing limits been marked and maintained before disturbing soils and during construction activities?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
ii.)	Is topsoil being preserved?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.

Soil Stabilization 2.1.2				
a.)	Temporary Soil Stabilization: Are all disturbed areas that will remain inactive for 14 or more days stabilized with erosion control BMPs?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.

b.)	Final Stabilization: Are all disturbed areas within any portion of the project that have completed clearing, grading, excavation, or other earth disturbing activities stabilized with erosion control BMPs?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
Dewatering 2.1.3				
a.)	Are dewatering activities controlled to prevent discharge to state waters?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
b.)	Has authorization been obtained under the Construction Dewatering General Permit or an individual permit prior to discharge of dewatering effluent to state surface waters?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
Pollution Prevention Measures 2.1.4				
a.)	Are pollution prevention measures that effectively manage and dispose of all pollutants in a way that does not cause contamination of storm water being implemented?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
i.)	Is cover, containment, and protection for all chemicals, liquids, petroleum products, and construction materials, products, and wastes being provided?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
ii.)	Is spill prevention and control measures for vehicle maintenance and fueling being used?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
iii.)	Are appropriate spill kits being maintained, spills and leaks being cleaned up immediately, and appropriate quantities being reported?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
iv.)	Is discharge of equipment wash water and clean-out wastes being prevented and these activities designated away from state waters and their conveyances?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
v.)	Are fertilizers and herbicides being applied per the manufacturers' requirements?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
vi.)	Is the discharge of concrete products being prevented?	☐Yes ☐No ☐N/A	☐Yes ☐No ☐N/A	Click or tap here to enter text.
Surface Outlets 2.1.5				

Are outlet structures that withdraw water from the surface being used when discharging from basins and impoundments?	☐Yes ☐No ☐N/A	☐ Yes ☐No ☐N/A	Click or tap here to enter text.

Prohibited Discharges 2.1.6				
Have there been the following prohibited discharges:		**Current**	**Past**	
i.)	Wastewater from washout of concrete.	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.
ii.)	Wastewater from washout and cleanout of stucco, paint, form release oils, curing compounds, and other construction materials.	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.
iii.)	Fuels, oils, or other potential pollutants used in vehicle and equipment operation and maintenance.	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.
iv.)	Soaps or solvents used in vehicle and equipment washing or external building wash down.	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.
v.)	Storm water discharges of disturbed, contaminated soils.	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.
vi.)	Toxic or hazardous substances from a spill or other release including the disturbance and/or removal of contaminated soils.	☐Yes ☐No	☐Yes ☐No	Click or tap here to enter text.
Describe any incidents of non-compliance not described above: Click or tap here to enter text.				

Click or tap here to enter text.
Inspector's Signature

Click or tap to enter a date.
Date

CITY OF HELENA
PUBLIC WORKS
POST-CONSTRUCTION STORMWATER MANAGEMENT PLAN REVIEW CHECKLIST

NAME OF PROJECT	ADDRESS	PROJECT FILE NO.
APPLICANT	ADDRESS	PHONE NUMBER
OWNER *(If different from Applicant)*	ADDRESS	PHONE NUMBER

Require post-construction storm water management controls (PCSMC) per Montana Post Construction Storm Water BMP Design Guidance Manual (BMP Guidance Manual) date 2017, on-site, if disturbed area is greater than 1 acre; or onsite or regional offsite, if the development is part of a larger common plan of development with a disturbed area greater than one acre.

Reviewed On: 3/1/2023 **Meets BMP Guidance Manual Requirements:** ☐ Yes ☐ No

Reviewed By: _____ **Comments Provided:** ☐ Yes ☐ No

Special Notes: _____

	Y	N	N/A	Comments
1. Area of development				
2. Post-development impervious area				
3. Regional or on-site PCSMC				
4. Offsite tributary area routed through or around PCSMC				
5. Type of PCSMC utilized				
6. Other Low Impact Development practices incorporated				
7. Soil percolation and infiltration data provided				
8. PCSMC sizing data provided				
9. City owned or privately owned PCSMC				
10. Easement provided for privately owned PCSMC				
11. Removal efficiency for proprietary PCSMC				
12. Impacts to wetlands or waterbodies				

POST-CONSTRUCTION STORMWATER MANAGEMENT CONTROL INSPECTION FORM

General Information		
Site Name:	Type of Control:	
Location:		
Site Owner:	Phone Number:	
Responsible Party:	Phone Number:	
Date of Inspection: Click or tap to enter a date.	Start Time:	End Time:
Inspector Name:	Inspector Title:	
Inspector Phone Number or Email:		

Type of Inspection:

☐ Routine- Dry Weather ☐ Routine- Wet Weather ☐ Complaint Response

☐ Other _____

Weather Information

Weather at time of inspection:

☐ Clear ☐ Cloudy ☐ Raining ☐ Sleet ☐ Fog ☐ Snowing ☐ High Winds

☐ Other: Temperature:

Do you suspect that any physical changes or damages to the stormwater management control may have occurred since the last inspection?

☐ Yes ☐ No

Are there any stormwater discharges at the time of inspection? ☐ Yes ☐ No

If yes, provide location(s) and a description of stormwater discharged from the site (presence of suspended sediment, turbid water, discoloration and/or oil sheen, odor, etc...)

Prohibited Discharges

Are there any prohibited discharges at the time of inspection and/or any signs of prohibited discharges since the last inspection? ☐ Yes ☐ No

If yes, provide location(s) and a description:

	Desired Condition	Findings	Corrective Action Needed & Notes
1	There is no excessive sediment deposition.	☐ True ☐ False ☐ N/A	
2	Slopes are well stabilized and are not contributing sediment to the stormwater management control.	☐ True ☐ False ☐ N/A	
3	There is no scour in swales or other vegetated areas.	☐ True ☐ False ☐ N/A	
4	Trash racks, inlets, outlets, and low flow orifices are clear of trash, debris, and sediment.	☐ True ☐ False ☐ N/A	
5	There is no woody vegetation impeding the performance of any structural component of the stormwater management control.	☐ True ☐ False ☐ N/A	
6	Outfall structures do not show signs of settling, cracking, bulging, misalignment or other structural deterioration.	☐ True ☐ False ☐ N/A	
7	Embankments, emergency spillways, side slopes or inlet/outlet structures show no signs of erosion.	☐ True ☐ False ☐ N/A	
8	Pipes going into and/or out of any stormwater management control are unclogged and unobstructed.	☐ True ☐ False ☐ N/A	
9	There is no evidence of animal burrows.	☐ True ☐ False ☐ N/A	
10	There is no trash or debris in the stormwater management control.	☐ True ☐ False ☐ N/A	
11	There are no encroachments on the stormwater management control.	☐ True ☐ False ☐ N/A	

	Desired Condition	Findings	Corrective Action Needed & Notes
12	All necessary repairs to safety devices such as fences, gates, covers or locks are complete.	☐ True ☐ False ☐ N/A	
13	There is not excessive algae or vegetation in the pond/ditch.	☐ True ☐ False ☐ N/A	
14	The ground surface stabilization is retaining any highly erosive or unstable soils, seed germination is being properly facilitated, and any netting or blankets are properly fastened to obtain full contact with the ground.	☐ True ☐ False ☐ N/A	
15	Stormwater control appears to be functioning properly.	☐ True ☐ False ☐ N/A	
16	Are there locations where additional stormwater management controls appear to be necessary?	☐ Yes ☐ No ☐ N/A	
17	Notes/Other Observations: ☐ None		

Describe any incidents of non-compliance or need for maintenance not described above:	
Follow-up inspection required? ☐ Yes ☐ No	Suggested follow-up on or before: Click or tap to enter a date.

Inspector Signature _____ Date _____

Appendix H. ERP

ENFORCEMENT RESPONSE PLAN FOR STORMWATER MANAGEMENT WITHIN THE CITY OF HELENA, MONTANA

April 2022

Introduction

In accordance with the General Permit for Storm Water Discharge Associated with Small Municipal Separate Storm Sewer System (MS4), issued by the Montana Department of Environmental Quality (DEQ), the City of Helena is required to develop and implement an Enforcement Response Plan (ERP) to ensure compliance with stormwater regulations. The purpose of this ERP is to specify criteria by which Storm Water Management Plan (SWMP) Team can determine the enforcement action most appropriate to instances of non-compliance and communicate how the enforcement tools available to SWMP Team will be used to achieve compliance following violations of the City's stormwater regulations. This document addresses the Montana DEQ MS4 General Permit's ERP requirements for the following Minimum Control Measures (MCM's):

- MCM 4: Illicit Discharge Detection and Elimination
- MCM 5: Construction Site Storm Water Management
- MCM 6: Post-Construction Site Storm Water Management in New and Redevelopment

The procedures within this ERP have been developed with the following objectives in mind:

- Prevent pollutants from entering the MS4 and causing environmental harm.
- Communicate definitions for non-compliance.
- Establish appropriate enforcement action based on the nature and severity of the violation.
- Promote consistent and timely use of enforcement tools.
- Ensure that violators return to compliance in a timely manner.
- Recover costs incurred by the City due to operator non-compliance.
- Promote compliance through education and compliance assistance first and, if necessary, penalties second.

The City of Helena has the authority to enforce stormwater regulations under Title 6: Public Utilities, Chapter 6: Stormwater Control of its municipal code which covers:

- Illicit Discharge Detection and Elimination under 6-6-10
- Construction Site Stormwater management under 6-6-15
- Post-Construction Site Stormwater Management under 6-6-15
- *Enforcement under 6-6-23 and 6-6-24*

A complete copy of the City Code regulating stormwater is included in Appendix I of the Storm Water Management Plan.

Acronyms

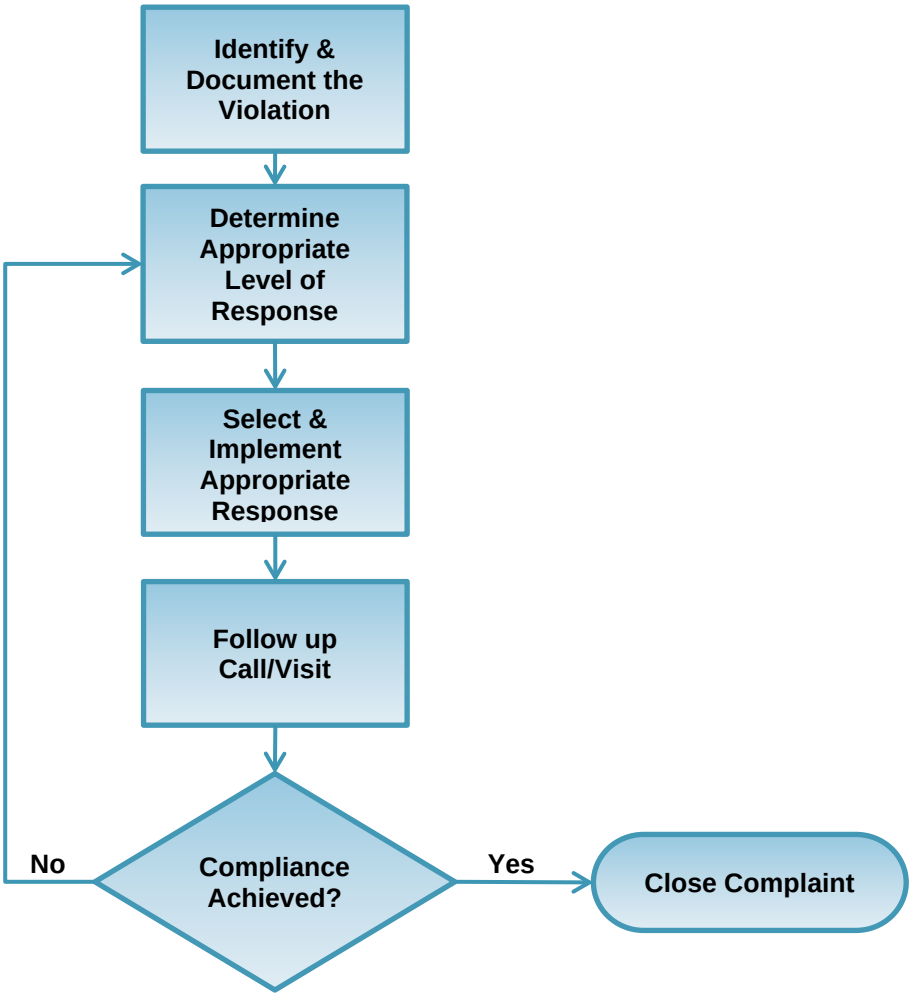
The following acronyms shall have the following meaning:

DEQ	Department of Environmental Quality
ERP	Enforcement Response Plan
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NOV	Notice of Violation
SWO	Stop Work Order

1. Enforcement Response Plan Overview

The enforcement process consists of six basic steps beginning with identification of a violation and concluding with closing the complaint. The overall process is shown within the flowchart below and is further explained within the following sections.

Enforcement Response Flowchart for the City of Helena Storm Water Management Program



2. Determining the Appropriate Level of Response

Once a potential violation is identified, the appropriate level of response should be determined and an appropriate response remedy should then be selected. The City has five levels of responses, each of which is briefly described below.

2.1 Level 1: No Enforcement Action

There may be situations where city personnel are made aware of a potential violation; however, sufficient evidence does not exist to prove a violation is taking place. An example of such situation may be if a complaint is received stating that a private stormwater control has not been properly maintained; however, after a brief site inspection and/or verbal discussion, the City staff determines the stormwater control is within compliance and no enforcement action is required. In such situations the potential violation and response should be documented using the Enforcement Response Documentation Form (Attachment A) so that it can be referenced in the future, if necessary.

2.2 Level 2: Informal Response

The City will pursue compliance to stormwater violations through informal methods whenever reasonable. Informal responses include telephone notification, verbal notice or meeting These methods are appropriate for situations where education is needed, violations do not pose a significant threat to human health or the environment, or the City believes that compliance can be achieved without the use of formal measures. In addition, implementation of informal measures often establishes the documentation necessary to implement formal enforcement actions if informal measures do not result in compliance.

i.) Telephone Notification/Verbal Notice

A telephone notification or verbal notice will be used to obtain additional information pertaining to a potential violation or to resolve an infrequent violation. The initial contact will take place within 24 hours of determining a potential violation. At a minimum, the conversation shall be documented with the following information: date/time call placed, the City staff member who initiated contact, the person contacted (responsible party), and the content of the conversation.

ii.) Meetings

A meeting will be requested with the responsible party when necessary to implement clean up. The meeting will serve to educate the responsible party regarding the violation and to discuss measures which shall be taken to correct the violation. The meeting will be conducted by Storm Water Coordinator or Utility Maintenance Supervisor. At a minimum, the meeting shall be documented with the following information: meeting location, date/time of meeting, meeting attendees, content of the conversation, and agreements made at the meeting.

iii) Corrective Measures

If it is determined that corrective measures are required, the responsible party will be notified in writing as to the nature of the corrective measures needed and a written response demonstrating that the corrective measures were addressed will be required.

2.3 Level 3: Civil Enforcement

As allowed by City Ordinance: Whenever the City of Helena finds that a person has violated a prohibition or failed to meet a requirement of the Helena Stormwater Control Chapter, the City of Helena may order compliance by written notice of violation to the responsible person. Such notice may require without limitation:

1. The performance of monitoring, analyses, and reporting;

2. The elimination of illegal connections or discharges;

3. That violating discharges, practices, or operations shall cease and desist;

4. The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property;

5. Payment of restitution for remediation costs;

6. The implementation of source control or treatment BMPs; and

7. The cessation of any construction or postconstruction work not permitted according to this chapter.

B. If abatement of a violation or restoration of affected property is required, the notice will set forth a deadline within which such remediation or restoration must be completed. Said notice will further advise that, should the violator fail to remediate or restore within the established deadline, the work may be done by the city and the expense thereof may be levied against the real property of the violator.

C. If the violation has not been corrected pursuant to the requirements set forth in the notice of violation, then the department may enter upon the subject private property and is authorized to take any and all measures necessary to abate the violation or restore the property. The total cost thereof may be assessed against the real property of the violator in the same manner as a property tax. It is unlawful for any person, owner, agent or person in possession of any premises to refuse to allow the department or designated contractor to enter upon the premises for the purposes set forth above. (Ord. 3120, 12-21-2009)

i.) Administrative Order

An administrative order is a formal enforcement document which requires the responsible party to either cease the specified activity or implement specified corrective measures. An administrative order will be issued when informal remedies have been pursued and have not resulted in compliance.

ii.) Notice of Violation

A NOV is an official communication from the City to the responsible party which informs the party that a violation has occurred. It will be issued for relatively minor or infrequent violations of the City's stormwater ordinances and requirements. It is a prompt response to violations and documents the initial attempts of the City to resolve the violation.

The NOV will include the following information: the specific violation, photos (if possible), timeframe and actions required to return to compliance, and a warning that further enforcement action may be taken for failure to comply.

NOV's shall be sent via certified mail/return receipt or hand delivered and signed by the responsible party within 10 working days after discovery of the violation.

iii.) Stop Work Order

A SWO is applicable to construction site stormwater management violations. It is a notice which informs the construction site operator that a stormwater management violation is ongoing and work is not allowed to continue until the matter is resolved. The SWO will be issued for failure to comply with a NOV or for significant violations of the City's construction site stormwater requirements that require immediate action. The SWO will include the following information: the specific violation, contact information for the City personnel who must be contacted to discuss required remediation procedures, the timeframe for which the City must be contacted to discuss the situation, and a warning which notifies the site operator that failure to comply will result in formal enforcement actions.

iv.) Compliance Schedule

A compliance schedule directs the responsible party to address the violation and restore compliance by a specified date. A compliance schedule will be issued when clean up does not occur within 10 business days of the date of the NOV. The schedule will include the following: the specific violation, noncompliance (document the City's previous attempts to

achieve compliance), state required actions to be completed by the responsible party, and the dates by which the actions must be completed to return to compliance.

Note that issuance of a compliance schedule does not necessarily relieve the responsible party of having to meet any existing stormwater control commitments, nor protect the responsible party from having additional fines levied for other violations during the compliance schedule period.

v.) Monetary Penalty

As allowed by City Ordinance: The originator of any hazardous material spill or introduction is responsible for the material and shall pay all applicable investigation and cleanup costs, including the cost of equipment, materials, staff time with fringes, and consultant charges.

2.4 Level 4: Violations and Criminal Enforcement

As allowed by City Ordinance: Violations of this chapter may also subject the violator to a fine in any sum not to exceed five hundred dollars ($500.00), or imprisonment in the county jail for a period not to exceed thirty (30) days, or both such fine and imprisonment. The department may recover all attorney fees, court costs, and other expenses associated with enforcement of this chapter, including sampling and monitoring expenses. (Ord. 3120, 12-21-2009)

i.) Civil Penalties

If necessary, a civil suit will be used to recover costs borne by the City in responding to the responsible party's noncompliance.

ii.) Criminal Penalties

Criminal prosecution is a formal process of charging the responsible party with violations of ordinance provisions that are punishable, upon conviction, by fines and/or imprisonment.

2.5 Additional Considerations

The following criteria will be considered to aid in determining the correct level of response:

i.) Magnitude

A minor isolated instance of non-compliance will typically be considered non-significant and addressed with informal responses; however, isolated incidents which may cause damage to the MS4 or pose a threat to human health and/or the environment will be considered significant and necessitate a formal enforcement action.

ii.) Duration

Regardless of magnitude, violations which continue over prolonged periods of time will result in escalated enforcement actions.

iii.) Compliance History

The responsible party's compliance history will be an important factor in determining the appropriate remedy to apply. The City has the authority to issue informal notices for the less severe violation if the responsible party has a good compliance history; however, recurring violations may lead the City to escalate the level of response in a shorter time-frame than usual.

iv.) Good Faith of the Operator

Good Faith is a characteristic of actions which show that the responsible party is intending to achieve compliance in a timely manner. If the responsible party is attempting in good faith to correct the violation the City's enforcement responses may be less severe; however, potential threats to human health and the environment will always take precedence when considering whether or not to base the City's level of response on the good faith of the responsible party.

In addition, while the responsible party's good faith in correcting its noncompliance may be a factor in determining which enforcement response is suitable, good faith does not preclude the responsible party from enforcement action.

3. Notification of Spills

Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting or may result in illegal discharges or pollutants discharging into stormwater, the storm drain system, or waters of the U.S. that person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials that person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of nonhazardous materials, said person shall notify the department in person or by phone, electronic mail, or facsimile no later than the next business day. Notification in person or by phone must be confirmed by written notice addressed and mailed to the department within three (3) business days of the phone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on-site written record of the discharge and the actions taken to prevent its recurrence. Such records must be retained for at least three (3) years.
(Ord.3120, 12-21-2009)

4. Enforcement Roles and Responsibilities

All significant violations and the responses shall be reported to the Storm Water Coordinator or Utility Maintenance Supervisor and the Public Works Director. The Public Works Director and City Attorney will be copied on all formal Enforcement Responses. The Public Works Director will consult with the City Attorney and City Administrator in Judicial Actions.

Glossary of Terms

Administrative Fine - A monetary penalty assessed by the City to the responsible party for a violation of the City's stormwater management requirements.

Administrative Order - A formal enforcement document which requires the responsible party to either cease the specified activity or implement specified corrective measures.

Compliance Schedule - A schedule of required activities necessary for a responsible party to achieve compliance with specified stormwater program requirements.

Consent Decree - An agreement between the City and the responsible party reached after a lawsuit has been filed.

Criminal Prosecution - A formal process of charging the responsible party with violations of ordinance provisions that are punishable, upon conviction, by fines and/or imprisonment.

Good Faith Effort - A characteristic of actions which show that the responsible party is intending to achieve compliance in a timely manner.

Injunctive Relief - A court order which directs the responsible party to cease a specified action or behavior.

Judicial Action - An enforcement action that involves a court. (The action may either be civil or criminal in nature).

Notice of Violation - An official communication from the City to the responsible party which informs the party that a violation has occurred.

Responsible Party – The person or organization responsible for a violation.

ATTACHMENT A
ENFORCEMENT RESPONSE DOCUMENTATION FORM

City Personnel Involved | Date

Description of Violation

Location of Violation (address)

( ) -

Responsible Party | Telephone

Street | City | Zip

Description of Violation:

Level of Response | Selected Remedy | Date for Follow-Up

Additional Notes:

Appendix K. Permit Compliance and Updates to SWMP

Storm Water Management Plan Updates Summary

In July of 2022, the City of Helena performed major revisions to the City's SWMP in response to the February 2022 Inspection Report issued by DEQ and the issuance of the 2022-2027 General Permit. Due to a lack of updates in previous years nearly every section of the SWMP received updates. The list of the substantive changes are logged below. For the 2023 Annual Report, the City has developed and is reviving a table used in previous years (most recently 2017) that helps to track SWMP changes made in the current year and intended to be made in the coming years. The table is not useful for the 2022 SWMP changes as the majority were not annual changes or updates required by the 2022-2027 General Permit.

SWMP Updates:

1. SWMP and Updates- The City has identified a consistent method to track and store records for permit compliance and making updates to the SWMP. The City has revamped the "Revised Table A.1 Implementation Schedule" from the 2017 Annual Report for use as a consistent method to track permit compliance and updates to the SWMP and has incorporated it into the updated SWMP for the 2022-2027 General Permit Cycle as Appendix K- Permit Compliance and Updates to SWMP Table. This Implementation Schedule Table will be updated on an annual basis to reflect the progress from the previous year and current year goals and objectives. Records for permit compliance will be stored in individual folders for each year that contain the required records of compliance for each MCM. Standardized naming conventions will be used for documents to indicate what section of the General Permit the document is a record for. The SWMP on the City's Storm Water webpage has been updated to the most current SWMP.
2. Organization Chart- The City has evaluated the existing relationship with the Lewis and Clark County Water Quality Protection District, and while they do provide extensive storm water education and outreach, the City has chosen to focus on the education and outreach conducted by the City staff to comply with the conditions of the General Permit this will improve annual reporting. The City has removed the Lewis and Clark County Water Quality Protection District from the Organization Chart. The City has revised the Organizational Chart in the SWMP for the 2022-2027 General Permit Cycle.
3. Program Management Software- This is list software programs used by the City and how it is used to improve and track communication and annual reporting. City Works- is used to track storm sewer maintenance and illicit discharge response. A report can be obtained for annual report data and projects/illicit discharges can be assigned to individuals in the City Works system. Track It- is used to log any project in the City which requires a building permit. A log can be obtained from the system for annual report data and projects can be assigned to individuals for follow up. City Source is a public facing web-based application used by citizens to report issued with City managed infrastructure and services. The system creates a ticket for each type of submission received. A record of each ticket can be obtained for annual report data and tickets are assigned to appropriate individuals for follow up.
4. Formalized Mechanisms of Communication: The City has established additional clarification, explanation, and formalized mechanisms of communication in the SWMP for the 2022-2027 General Permit Cycle. The City's formalized mechanisms of communication include utilizing software programs, an infrastructure acceptance policy, meetings, and standardized email procedures. The software programs include Track IT for building permitted projects, City Works

for storm sewer maintenance and illicit discharge response, City Sourced for community reporting and response, and Engineering Design Standards Infrastructure Acceptance Policy for projects involving infrastructure installation. Additionally, the City has scheduled quarterly meetings of the Storm Water Management Team (Team).

5. Development of a Tailored Outreach Strategy for Each Key Audience- The City has developed a tailored outreach strategy for each key target audience. Table 1 of the 2017 SWMP has been updated in the SWMP for the 2022-2027 General Permit Cycle and the information contained therein separated into three tables (Table 1, Table 2, and Table 3) and expanded upon to improve the column headings and more clearly identify the outreach strategies specifically selected for each key target audience. The City may continue to send out informative material in the Utility Bill inserts, but will cease to submit it as part of the City's tailored outreach strategy for key target audiences. The City will also continue to provide additional education and outreach materials for non-key target audiences on the Storm Water webpage, however the City is not actively utilizing them for the City's General Permit compliance and are providing them on the City's webpage solely for ease of access to informative material for interested individuals. Any outreach materials provided to key target audiences as part of the outreach strategy will be included on the Storm Water webpage and in the annual report. The City has also fixed all the misdirected links on the Storm Water webpage.
6. Identification of Approaches for Involving Key Target Audiences- The City has updated the SWMP section for MCM 1 and 2 for the 2022 - 2027 General Permit Cycle to include a formal opportunity for public involvement/participation. During the event, the public will be able to provide comment on the SWMP and the City will document all relevant input, responses, and SWMP modifications made as a result. The first opportunity and request for the public to provide comment on the SWMP will be held the first week in November. The City will document the relevant input and responses and make the resulting modifications to the SWMP as necessary. If deemed necessary, a second follow up request for public comment on the SWMP would occur the first week in December. The City will again document the relevant input and responses and make the resulting modifications to the SWMP as necessary. The City will utilize its Be Heard Helena webpage to request, track, record, and respond to the public's comments. The City will comply with all state and local public notice requirements by publishing the opportunity for public involvement/participation in the Independent Record at least twice and 6 days apart prior to the event.
7. Adopt Standardized Temporary Best Management Practice (BMP) Specifications- The City has adopted Montana DEQ Storm Water management During construction Field Guide for Best Management Practices as their standardized BMP specifications and has included references to it in the SWMP.
8. The City modified the SWMP to include Proper Installation, Operation, and Maintenance of Storm Water Management Controls- The City now requires a written response addressing the deficiencies to improve documentation related to follow-up of inspected BMPs that are not installed, operated, or maintained properly.
9. Construction Storm Water Management Plan Review Checklist- The City has updated their plan review checklist for the 2022-2027 permit cycle in response to further guidance received from DEQ in August 2022. The City has updated the SWMP for the 2022-2027 General Permit to include the updated plan review check list. The City has also performed the necessary updates to the 2023 Checklist to ensure it is compliant with the General Construction Permit issued on January 1, 2023.

10. Construction Site Inspection Form- The City has reviewed and update the Construction Site Inspection Form in response to guidance received in August of 2022 to be consistent with the 2021 General Permit for Storm Water Discharges Associated with Construction Activity. The City has also performed the necessary updates to the 2023 Inspection Form to ensure that it is compliance with the General Construction Permit issued on January 1, 2023.
11. Inspection Frequency Protocol- The City developed a Construction Site Inspection Frequency Protocol based on Part II.A.3.b.iii. and is including this form in the SWMP for the 2022-2027 permit.
12. Incorporation of Requirements into Plans, Policies, and Ordinances to Utilize Low Impact Development (LID) Concepts- The City has been and will continue to adhere to the requirements for LID under Part II.A.4.d. for Low Impact Development. The City has extensively revised their Engineering and Design Standards to improve their storm water treatment and LID requirements. Adoption of the new standard is pending, but will be incorporated into the SWMP upon approval by the City Commission.
13. Plan Review Checklist- The City has an updated and included a post-construction storm water management plan review Checklist in the SWMP for the 2022-2027 permit. The City reviews all permitted projects within the city for storm water and requires post-construction best management practices in accordance with the permit. The City has started to maintain electronic copies of review documentation to improve record keeping specific to the 2022-2027 General Permit.
14. Inspection of High Priority Post-Construction Storm Water Management Controls (PCSMC)- The City has updated the High-Priority Storm Water Management Controls inspection frequency table to identify the High-Priority Storm Water Management Controls as those that require annual inspections and the Priority Storm Water Management Controls as those that are inspected once per permit term.
15. Inventory of Permittee Owned Facilities and Activities- The City has updated its Pollution Prevention and Good Housekeeping Standard Operating Procedures to include snow disposal areas operated by the permittee.
16. Annual Trainings- The City's training for the SOPs and the activities associated with facilities has been updated with greater detail and options for the City in the scenario that the City id unable to perform the required trainings in house. The City was able to conduct the required trainings in house in 2022. A video recording of the training and training rosters were maintained.
17. Training Frequency and Training Curriculum- The City conducted trainings in accordance with the 2022-2027 General Permit and updated the SWMP accordingly. The City has developed a training matric plan for the four training categories in the permit and has included this training matrix plan in the updated SWMP.
18. Trainings- The City updated the SWMP Team and has completed training for the team and for the Facility personnel as required under the 2022-2027 General Permit and in accordance with the training matrix plan referenced above.
19. Pollution Prevention and Good Housekeeping- The City has updated this portion of the SWMP to include a standard Facility Inspection From to comply with II.A.5.a.ii for inspection procedures.
20. TMDL-Related Monitoring- Section 8.0 Special Conditions Monitoring in the SWMP was revised and updated. The strategy rational, monitoring frequency, monitoring parameters, and monitoring locations are documented in the request to DEQ and in the SWMP.

Storm Water Management Program Updates Summary

The City of Helena performed minor revisions to the City's SWMP in 2023 especially in comparison to the major revisions performed in 2022. The revisions performed in 2023 were based general program updates, grammatical and formatting errors and on issues identified in a letter from DEQ in July of 2023. The purpose of DEQ's July 2023 letter was to provide the City feedback on the annual report to improve program performance and subsequent reporting. The July 2023 letter was invaluable and the City was able to utilize the letter to make improvements and clarifications to the SWMP for the coming year and improve City operations. The feedback will also be used to guide future program enhancements.

A summary of the updates made are below, the updates went into effect on March 1, 2024:

1.) Page 3: SWMP relevant documents were added to the City's storm water website. The availability of these reference documents on the website was noted in the SWMP.
2.) Page 3: The SWMP contact list was updated and added to Appendix A of the SWMP.
3.) Page 4: The SWMP better defined the division of the various roles and responsibilities of the Storm Water Engineer while the position is vacant. This was also illustrated in the updates Organizational Chart in the same Appendix.
4.) Page 5: The public storm water URL was updated as the City went live with a new web platform between Annual Report submission and review. Note: This may also be the case in 2024 as the City is working on moving the Storm Water web page from under the Utility Maintenance page and onto the main Public Works program page.
5.) Page 6/7: The Associated Pollutants for pet feces was updated to nutrients (nitrogen and phosphorus).
6.) General Issues were identified with appendix documents not being present. Each document listed as an appendix document was added.
7.) General typo issues were fixed throughout the document.
8.) Page 16: Reference to the "current Construction General Permit" was changed to "2023 General Permit for Storm Water Discharges Associated with Construction Activity (effective January 1, 2023)". A review of the CGP every five years with the SWMP review was also included.
9.) Appendix H- Enforcement Response Plan was reviewed and updated. While it is now in compliance with the permit, this document will go through further reviews and an update issued on January 1, 2025. This is due to the City's planned expansion of the enforcement.
10.) High Priority Outfalls were also identified on Table 5 of the SWMP.
11.) The SWMP section on MCM 5 was edited to reflect that the Engineering and Design Standards the City purposed in 2022 were rejected and therefore did not pass. All references were reverted back to the 2013 Engineering and Design Standards.
12.) MCM 6 section updated to include requirement for manager of new hires that are required to receive training the perform the required training within 90 days of hire and to submit the required information to the acting Storm Water Coordinator for recording.
13.) Table 8 "Storm Event and TMDL Monitoring Locations" was updated to reflect the replacement of Monitoring Site 006 with 008.
14.) Table 3 "Key Target Audience Implementation and Performance Tracking" was updated to reflect the outreach education anticipated for 2024 and the Key Target Audiences identified based on illicit discharges, spill, and dumping reported through complaints and staff observations.

Storm Water Management Program Updates Summary

The City of Helena performed minor revisions to the City's SWMP in 2024 The revisions performed in 2024 were based generally on program updates, grammatical and formatting errors and continuing to implement suggested improvements to issues identified in a letter from DEQ in July of 2023. The purpose of DEQ's July 2023 letter was to provide the City feedback on the annual report to improve program performance and subsequent reporting. The July 2023 letter was invaluable, and the City was able to utilize the letter to make improvements and clarifications to the SWMP for the coming years and improve City operations. The feedback will continue to be used to guide future program enhancements.

A summary of the updates made are below, the updates will go into effect on March 1, 2025:

1.) Appendix A, Figure 2: The SWMP contact list was updated.
2.) Page 3: Formalized Mechanisms of Communication section was updated to remove old software and include new software programs utilized by the City.
3.) Page 4: References to old software (Track IT) was removed and updated to the new platform Tyler.
4.) Page 6: The public storm water URL was updated as the City went live with a new web platform. The City has successfully moved the Storm Water web page from under the Utility Maintenance page and onto the main Public Works program page. The new URL is: https://www.helenamt.gov/Departments/Public-Works/Utility-Maintenance/Storm-Water
5.) Page 6: The City has removed the reference to the Independent Record to satisfy local public notice requirements.
6.) General typo issues were fixed throughout the document.
7.) Page 7: Table 1, Key Target Audience Identification and Selection updated based on annual Key Target Audience review.
8.) Page 8: Table 2, Key Target Audience Outreach Strategy and Planned Timeframe was updated based on the annual Key Target Audience review.
9.) Page 9: Table 3, Key Target Audience Implementation and Performance Tracking was updated based on the annual Key Target Audience review.
10.) Page 13 and generally throughout: fixed broken links within the document.
11.) Page 16: Updated reference to new software system.
12.) Page 18: Continue to cleanup references to the 2022 proposed Engineering Standards
13.) Page 21: Updated Permit Reference: Part II.A.4.d.i: Removed references to 2022 Engineering Standards and updated the information to the current situation and projected timelines for the 2025 Engineering Standards.

Storm Water Management Program Updates Summary

The City of Helena performed minor revisions to the City's SWMP in 2025. The revisions performed in 2025 were based generally on program updates, grammatical and formatting errors and continuing to implement suggested improvements to issues identified in a letter from DEQ in July of 2023. Feedback from DEQ on the City's SWMP has been invaluable and will continue to be used to guide future program enhancements.

A summary of the updates made are below, the updates will go into effect on March 1, 2026:

1.) Appendix A, Figure 1 and 2: The SWMP Team Organizational Chart and Contact List was updated.
2.) General typo issues were fixed throughout the document.
3.) Page 7: Table 1, Key Target Audience Identification and Selection updated based on annual Key Target Audience review.
4.) Page 8: Table 2, Key Target Audience Outreach Strategy and Planned Timeframe was updated based on the annual Key Target Audience review.
5.) Page 9: Table 3, Key Target Audience Implementation and Performance Tracking was updated based on the annual Key Target Audience review.
6.) Page 21: Updated Permit Reference: Part II.A.4.d.i: Removed references to 2022 Engineering Standards and updated the information to the current situation and projected timelines for the City's Updated Engineering Standards.
7.) Page 23: Table 7, SWMP Training was revamped to more clearly show current training the City is performing.
8.) Cover Page: Updated with the City's current logo.