

City of Montrose

Montrose has many existing programs and resource elements in its stormwater program. Montrose Public Works Department will check for oil sheens, discoloration, or odors in the river and storm drain outfalls. The city has mapped the storm drain system and will be putting it in the GIS system. The Emergency Dispatch hotline number provides 24-hour/365-day spill response.

Section 1.0 Public Education and Outreach

Introduction

The Public Education and Outreach on Storm water Impacts minimum control measure is one of six measure the City of Montrose, an operator of a phase II regulated small Municipal Separate Storm Sewer System (MS4), is required to include in the City Storm water Management Program to meet the conditions of the State permit.

Improving public understanding has the potential of enhancing program implementation, increasing funding, and facilitating greater program compliance. The Public Education and Outreach Program conducts outreach activities regarding the impacts of the storm water discharges on water bodies, informs businesses and the general public of the impacts associated with illicit discharges or improper disposal and promotes awareness of storm water quality control measures.

Goal Statement

The goal of the Public Education Program is to provide education and guidance to the Citizens of Montrose regarding ways to improve stromwater quality. To achieve this goal, several different programs will be implemented. Some of the programs included provide information as to the proper use and disposal of chemicals, fertilizers and pesticides, protecting and restoring vegetation, and properly disposing of harmful materials and hazardous wastes.

Introduction of Proposed Programs

1.1 Brochures, Publications, Bumper Stickers, Refrigerator Magnets, and Fact Sheets and Checklists

1.1.a. Brochures will be distributed to local businesses throughout the City and placed at Municipal sites year round, such as City Hall, Pavilion, Chamber of Commerce, and Police Department to name a few. **The City of Montrose will initially distribute 200 brochures the first year.** The brochures will provide information about the impacts of stormwater discharges on water bodies and the steps the general public and businesses can take to reduce pollutants in stormwater runoff. They will also include the hotline phone number to assist in reporting illegal discharge. This program will be implemented year 2 – by December 31, 2004.

1.1.b. Publications that can be accessed are *The City Beat*, which is a citizen publication that is mailed out to all City of Montrose addresses. This is available quarterly beginning in March, June, September and December of each year. This was implemented in approximately 1999 with mailings to 13,000 residents. We will include information in the publication on a quarterly basis, concerning illegal discharge, the consequences of, and the hotline phone number. This will be implemented in year 1 – completed by December 31, 2003.

1.1.c. Pollution Prevention Fact Sheet and Checklists will be distributed to 100 local businesses which would include, but not limited to: car washes, service stations, auto body, dry cleaners, metal plating business, fuel distribution center, Chamber of Commerce, Montrose City Hall, vet clinics, and bulk fertilizer plants. The information packet will include pollution prevention, ways to reduce wastes and make their operations more efficient. Also included will be checklists to help assess current activities. Fact sheets and checklists are on file and available upon request. This will be implemented in year 1 – by December 31, 2003.

1.1.d. Bumper Stickers that will include the hotline number to report violators of illicit discharge will be available throughout the City of Montrose. The bumper stickers will be implemented in year 3 – by December 31, 2005.

1.1.e. Refrigerator Magnets will be distributed in the Utility bills to provide general information to the public on items related to stormwater . This will also include the hotline phone number. This will be implemented in year 4 – by December 31, 2006.

Scope: The above-mentioned items will provide information about the impacts of stormwater discharges on water bodies and the steps the general public and business can take to reduce pollutants in stormwater runoff. There will also be information and solutions on the impacts associated with illegal discharges and improper disposal of waste. Solutions include alternatives to follow to avoid polluting with pet, auto, chemical pollutants, and participate in the collection and recycling programs the City offers.

1.2 Channel 10 Stormwater Programming

Information pertaining to stormwater quality will be aired on the City of Montrose's cable channel.

Scope: The intent of this educational program will be to provide a basic understanding of what stormwater is and how its quality is relevant to our drinking water. The program will provide an explanation of where stormwater goes. It will also stress the negative impacts of pollution on stormwater and the impacts on our drinking water. Solutions to the negative impact of pollution will be offered. It will run for approximately 20 weeks a year. This broadcasts 24 hours a day, 365 days a year. We will begin this broadcast in year 1 – by December 31, 2003. Cable is in approximately 4,641 homes in the City of Montrose and 711 homes in the County of Montrose.

1.3 Education for School Age Children

City staff will implement a public education program to present to school age children about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

Scope: Educational material such as booklets, or pictures to color will be distributed to describe steps individuals can take to reduce pollution and the effects of pollution in our water. The educational program will be implemented in year 5 – by December 31, 2007.

1.4 Recreational guides to outdoorsman

Recreational guides to educate groups such as golfers, hikers, paddlers, climbers, fisherman, hunters and campers will be distributed to Chamber of Commerce and businesses related to these activities.

Scope: Information packets will be available for recreational guides to educate outdoorsman of possible contamination to water. **The City of Montrose will distribute 100 guides throughout the area, sports businesses and the Chamber of Commerce.** This packet will be implemented in year 4 – by December 31, 2006.

1.5 Tributary Signage

Tributary Signage will be distributed to increase public awareness of local water resources. Signage will also be distributed to make residents aware of the consequences of dumping in storm drains. An example of signage would be “NO DUMPING, DRAINS INTO RIVER”.

Scope: **The City of Montrose will post 1 sign on 10 waterways or systems draining to the waterways the first year of implementation. We will continue installing 10 signs per year to established waterways until all areas are identified. The signs will be distributed by City Staff and will be inspected on an annual basis. At the time of inspection, we will install signs to any new irrigation ditches.** The signs will be designed and installed in year 3 – by December 31, 2005.

1.6 Web Site

The Internet is a widely used tool by the public and private sectors. The City website can be found at www.cityofmontrose.org in which one can access the City of Montrose home page. General information pertaining to the City of Montrose Stormwater plan will be provided along with the hotline number to report violators on the Public Works page.

Scope: The stormwater quality web page will contain phone numbers to call for the following situations:

1. Information on the public reporting of illicit discharges and improper disposal of wastes. This will include the hotline phone number.
2. Information on where to recycle household quantities (collection programs) of used motor oil, antifreeze, latex paint or batteries, computers, leaf bags, Christmas trees and refrigerators.

This website will be up at all times and revised every six months. The implementation of this program will be complete in year 2 – by December 31, 2004.

Existing Programs in Public Education and Outreach

1.7 Economic Incentives

Economic incentives to residents and business owners will be available. The incentives available would be free mulch provided by the City of Montrose and free tire disposal also offered at the Public Works Department.

Scope: Mulch would be available to residents and business owners for landscaping. City residents inform City Hall when they need branches chipped. The City chips the branches and stockpiles them across from the Public Works Department. When someone would like a pickup load, City employees will assist in loading the mulch with our front-end loader. This program has already been implemented approximately three years ago. We will continue this project as stated above. This will assist residents in complying with erosion control issues.

The tire-cutting program is designed to save citizens landfill charges of \$5.00 per tire. This program is available through the Public Works Department. More detailed information available in Section 3.8.

Measurable Goals

See Measurable Goals Table - attachment A

Section 2.0 Public Involvement and Participation

General Information

This section offers general guidance on how to involve the public with the City's Stormwater Management Program and comply with the minimum control measure.

Goal Statement

The goal of the Public Participation/Involvement Program is to give the citizens of Montrose opportunities to play an active role in the implementation of the program. The programs will provide an opportunity for the public to participate in activities related to stormwater quality while at the same time, gaining knowledge about pollution as it relates to water quality as well as taking care of the environment.

Introduction of Proposed Programs

2.1 Public Hearing

The City of Montrose will offer an annual public hearing to City Council and the citizens of Montrose with the City's NPDES Program as the topic for discussion. A notice of this public hearing will be published in the Montrose Daily Times, City's Website, local television and radio.

Scope: At these meetings, the City's NPDES program will be presented to the City Council with citizens present. Citizens will have the opportunity to discuss various viewpoints and provide input concerning the many issues related to stormwater quality. Brochures relating to stormwater will be made available to the public at these hearings. Staff will make a presentation at this Hearing. Annual public hearings will begin in year 1 – by April 2003.

2.2 City Survey

The City of Montrose will distribute a citywide survey on an annual basis. Within the survey, questions related to stormwater quality, recycling, community cleanups and other services the City offers to citizens would be included.

Scope: The Citywide survey will be distributed as an attachment to the water bills. After the data is gathered, the information will be summarized and used as a measure of effectiveness of the adopted programs and reported to the Colorado Department of Public Health and Environment in the annual report. The survey will be administered in year 3 – by December 31, 2005.

2.3 Storm Drain Marking and Stenciling

Clean water is valued for drinking and recreation, and as a fish and wildlife habitat. Yet some people will dispose used oil, antifreeze, household or garden chemicals, as well as other toxic materials into neighborhood storm drains, not realizing that there is a connection between storm drains and local waters. Storm Drain markings are designed to raise public awareness of this connection. These markers will contain information such as, "No Dumping – Drains to River" printed on them and are placed on storm water grates or surrounding areas by volunteers. Where a grate is not easily accessed or visible to the public we will stencil the surrounding area. Volunteers will complete this project.

Scope: We will work with organizations within the City, such as School Organizations, Girl Scouts and Boy Scouts to install markers, stencil storm drains and discuss pollution prevention as it relates to stormwater quality. When meeting with these groups, staff will lecture as to the association of storm drains, pollution, and local waterways. City staff will set up the installation of markers and stenciling annually. Implementation of the developed program will begin in year 3 – and be complete by December 31, 2005.

2.4 Stormwater hotline

An informed and knowledgeable community is crucial to the success of a stormwater management program. Therefore, we will have a hotline number available 24 hours a day for information or reporting of illegal discharge.

Scope: The City will set up a hotline number for reporting of illegal discharge and information concerning prevention of illegal discharge. The staff will be trained to answer questions and report to the authorities if illegal discharge is reported. This program will be implemented in year 1 – by December 31, 2003.

Existing Programs in Public Involvement and Participation

2.5 Pet Waste Program

The City of Montrose Parks and Recreation Department has developed a Pet Waste Program in the City Parks.

Scope: The City of Montrose Parks and Recreation Department installed "Pet Pickups" for proper disposal of pet waste in the City Parks. Each person is responsible for cleaning up after his or her pets. This project was implemented in 2002. This program will be continued and be maintained by the Park Department as needed.

Measurable Goals

See Measurable Goals Table – Attachment A

Section 3.0 Illicit Discharge Detection and Elimination

General Information

Illicit discharges enter the system through either direct connections (e.g., wastewater piping either mistakenly or deliberately connected to the storm drain). The result is untreated discharges that contribute high levels of pollutants, including heavy metals, toxics, oil and grease, solvents, nutrients, viruses, and bacteria to receiving water bodies. Pollutant levels from these illicit discharges have been shown in EPA studies to be high enough to significantly degrade receiving water quality and threaten aquatic, wildlife, and human health.

The EPA regulations state that the permittee must develop, implement, and enforce a program to detect and eliminate illicit discharges. Any discharge to an MS4 that is not composed entirely of stormwater, and which has not been authorized under a discharge permit by the State or the EPA, is considered an illicit discharge.

This section offers general guidance on the detection and elimination of illicit discharges.

3.1 Storm Sewer System Outfall Map

A Storm Sewer System Outfall Map has been developed by City staff indicating the major drainage ways located within the City of Montrose as well as the outfall points along these drainage ways. This map will demonstrate a basic awareness of the intake and discharge area of the stormwater system. The map will also provide a means of assisting City staff in responding to and tracing illicit discharges when located.

Scope: The Storm Sewer System Map has been created on the City's Geographical Information System (GIS) but the outfalls have not been identified. Staff have approached each location on the map and identified the outfall points. The GIS Department will identify the outfall location in the system. This project will be completed in year 3 by December 31, 2005. The map will be updated as additional information becomes available such as annexations, subdivision development, and new storm water links to the overall system.

3.2 Proposed Regulatory Mechanism

The purpose of the Stormwater Ordinance is to give the City the authority to safeguard persons, protect property, and prevent damage caused by illicit discharges to the environment.

Scope: The City Attorney's Office will prepare a stormwater ordinance in which the City Council will review. The stormwater ordinance will allow the City to identify and monitor illicit discharges as well as enforce penalties. A rough draft of the storm water ordinance will be presented to City Council in April 2003. The final draft will be presented to the City Council in year 1 - by December 31, 2003.

3.3 Illicit Discharge Detection and Elimination Plan

An Illicit Discharge Detection and Elimination Plan will be implemented in accordance with the state permit. This plan will include procedures for locating, tracing, and removing the source of illicit discharges. Multiple resources will be tapped to enable the City to detect and eliminate these illicit discharges. **The objectives of the minimum measures are to:**

- 1. Control illicit discharges by conducting field surveys/investigations of the storm sewer system to identify and eliminate improper connections to the system and prevent illicit discharges from indirectly entering the system.**
- 2. Prevent improper disposal of wastes through public education and providing appropriate waste material disposal options and incentives.**
- 3. Contain and cleanup accidental spills using proper cleanup and disposal materials and methods.**

To meet these objectives, the requirements of the Illicit Discharge Detection and Elimination component of the Storm Water Program are to:

- 1. Update the City's storm sewer map showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from the outfalls.**
- 2. Enforce the city's storm water ordinance to prohibit non-storm water discharges from entering the storm sewer system and waters of the waterways within the permit boundary area.**
- 3. Follow-up with enforcement procedures to address identified non-storm water discharges.**
- 4. Educate the general public, businesses, and public employees about the hazards (and legal consequences) of illicit discharge.**

Poor infrastructure conditions in older sections of the City or outdated building codes may have resulted in directly connected wastewater pipes that should be removed or rerouted. Other connections may have been established illegally that are leaking targeted pollutants into the storm sewer system.

Through the use of the city's closed circuit television camera, field inspections by city staff and student interns, and public complaints, the number of illicit connections will be identified and eliminated.

Scope: Several of the proposed programs previously discussed are applicable to illicit discharge detection. One method that will be implemented is the stormwater hotline as mentioned in 2.4. Another resource that will be used for detection will be the Storm Sewer System Outfall Map mentioned in Section 3.1 of this program. The foreman of the Waste Water Treatment Plant completes inspections and investigations of businesses and problem areas for illegal discharge into the sewer system. During his inspections/investigations he will inspect storm sewer systems and note any discrepancies immediately to the Public Works Department for further investigation. All Public Works employees and Community Development inspectors have been trained to identify illegal discharge and what measures to take to notify appropriate officials. The city has hired a Public Improvements Inspector who will be responsible for locating and addressing priority areas and sampling areas of suspect outfalls. If illegal discharge is suspected the city will take measures to eliminate the discharge by using our sewer vacuum truck. If anyone is found to be intentionally discharging into the storm sewer system a fine may be assessed. These are just a few of the examples listed in the MS4.

In addition to the hotline number and outfall map, the City will perform periodic visual screenings throughout the year. Sampling will occur in areas of suspect outfalls as well as follow-up inspections as needed.

The City will enforce the Stormwater Ordinance to eliminate illicit discharges. Educational efforts made through brochures, storm drain markings, and hazardous waste collection programs to name a few may serve as a deterrent to polluting. Implementation of the Illicit Discharge Detection and Elimination Programs will begin in year 1 – by December 31, 2003. Rough draft on file and available for your review upon request.

Illicit Discharge, Allowable Discharge

The following categories of non-storm water discharges or flows (i.e., illicit discharges have not been identified as significant contributors of pollutants to the storm sewer system: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005 (20), uncontaminated pumped ground water, discharges from potable water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats or wetlands, dechlorinated swimming pools, street wash water, and emergency fire fighting discharges.

Existing Programs for Illicit Discharge Detection and Elimination

3.4 Hazardous Waste Collection

To discourage illegal illicit discharges, the City currently and will continue to offer a hazardous waste collection program to all citizens of the City and County of Montrose.

Scope: The City accepts multiple types of hazardous waste, not limited to: House and garden chemicals; paint products; automotive fluids and batteries. The materials collected will be recycled (e.g., used oil), used as a waste fuel (e.g., solvents), or are disposed of properly at hazardous waste facilities. To inform residents that there will be a hazardous waste collection day, the event will be advertised in the newspaper, radio, television and the City website.

3.5 Computer Drop Off

We implemented this program last year because the landfill does not accept computers, printers, monitors, and keyboards. The City of Montrose offers a computer drop off day in September to all citizens of the City and County of Montrose.

Scope: The City accepts computers, printers, monitors, and keyboards at the computer drop off in September. One Saturday is set aside for the drop off. This is a free service offered to the City and County of Montrose. We offer the items we collect to the surrounding schools for use in their computer labs. The items that the schools do not want are sent to a recycling company. To inform residents of this service, the event will be advertised in the newspaper, radio, television and City's Website. This program was implemented in September 2002.

3.6 Cardboard Recycling

A cardboard recycling program was implemented four years ago as a pilot program. The City continued this program to select businesses on Main Street and Townsend Avenue. Every Wednesday our Sanitation Department collects cardboard from businesses and drops them off at the local recycle center.

Scope: This program was implemented as a pilot program with select businesses. We have continued the service to the same select businesses. The City collects the cardboard from the businesses free of charge. When we drop the contents off at the recycle center we are charged at a rate of \$2.00/ cubic yard. This program will be expanded to other businesses in year 3 – by December 31, 2005.

3.7 Refrigerant Recycle

The City accepts refrigerators, freezers, or any other appliance that holds refrigerant. We have a system that evacuates the freon from the appliance before we deliver to the metal salvage yard. This service is provided for the City and County of Montrose. Citizens can arrange pick up of the appliances with City Hall.

Scope: The Refrigerant recycle program was implemented in May 2002. We have a system that evacuates the appliance. The freon that is evacuated is sent to a recycle company or stored at our shop for future use. The appliance is then tagged by a certified technician at our shop and delivered to Recla Metal Salvage Yard for disposal. The City charges \$10.00 per appliance for this service or there is no charge during Spring Clean-up.

3.8 Tire Cutting

The Public Works Department designed and fabricated a tire-cutting apparatus. This is designed to cut tires into smaller pieces for disposal. This allows citizens to have tires disposed of instead of dumping in lakes, streams or ditches.

Scope: The City implemented the tire-cutting program in January 2001. This program is designed to cut tires in smaller pieces thus allowing us to dispose of them as regular trash at the landfill. This in return saves the citizens landfill charges of \$5.00 per tire. Tires no longer hold water when cut, thus eliminating a common breeding ground for mosquitoes. Citizens have the option to dispose of the tires during Spring Clean up or may drop them by the Public Works Shop at any time free of charge. **Due to the geographical location of the City of Montrose and lack of a tire recycling facility within the western slope of Colorado, a viable economic solution for recycling tires is not feasible for the city at this time.**

Measurable Goals

For Measurable Goals Table – See Attachment A

4.0 Construction Site Storm Water Runoff Control

General Information

Construction site runoff can be a source of various pollutants that cause physical, chemical, and biological harm to receiving waters. Regulations under the Phase II program require the permittee to develop, implement, and enforce a program to reduce pollutants in any stormwater runoff MS4 from construction activities that result in a land disturbance of greater than or equal to 1 acre, or construction activities disturbing less than 1 acre, but which are part of a larger common plan that would disturb 1 acre or more.

Goal Statement

The goal of the Construction Site Runoff Program is to provide information and direction to developers, contractors, as well as citizens, regarding stormwater quality as it relates to construction. This program has been developed with the following objectives in mind:

- To reduce soil loss from all construction sites to the maximum extent practicable;
- Improve the water quality of storm runoff to the maximum extent practicable;
- Prevent accumulations of soil and debris in the storm sewer system of the City of Montrose originating from construction activity;
- Prevent discharges of chemicals, chemical wastes and other pollutants from leaving construction sites;
- Prevent migration of construction debris off site;
- Prevent damage to properties adjacent to construction sites arising from sediment, debris, chemical wastes or other pollutants;
- Protect state waters and wetlands from damage caused by erosion, sedimentation, chemical wastes, or other pollutants arising from construction activity.

The existing BMPs for managing construction waste (in the form of discarded building materials, concrete truck washout, litter, and sanitary waste) at site developments and individual commercial and residential constructions sites are covenants and ordinances prohibiting such nuisances, requiring portable toilets, and requiring washout wastes, from concrete and painting to remain onsite, by washing into pits or sumps to protect water quality.

4.1 Proposed Regulatory Mechanism

The purpose of the Stormwater Ordinance is to give the City authority to safeguard persons, protect property, and prevent damage caused by illicit discharges to the environment.

Scope: The City Attorney's Office will prepare a stormwater ordinance in which the City Council will review and comment. The stormwater ordinance will allow for the City to identify and monitor illicit discharges as well as enforce penalties. The rough draft of the stormwater ordinance will be presented to the City Council in April 2003. The revised copy of the ordinance will be presented to the City Council in year 1 – by December 31, 2003. Rough draft of ordinances in file and available upon request.

4.2 Stormwater Management Plan

The Stormwater Management Plan (SWMP) that is used in this minimum control measure is the same as used in the Post-Construction Runoff Minimum Control Measure. All development, re-development, and capital improvement projects that disturb one acre or more of permeable land are required to address erosion, sediment control, and water quality issues. As part of the construction application packet, all applicants will complete a SWMP (which is required by Colorado Department of Public Health and Environment in order to obtain coverage under the General Stormwater permit for Construction Activities) and submit it to the City of Montrose, with a copy of your completed application or permit from the state.

. The information requested with the application will be used in reports required by the state.

Scope: The SWMP Packet will include the following material:

- **General Information.** The City requests basic information about the applicant and the construction activities that will take place. A copy of the following plans or reports listed below will be reviewed upon request and kept on file by the Permittee.
- **Spill Prevention and Management Plan.** This plan will detail how spill containment will be managed and handled by the applicant;
- **Best Management Practices.** This plan will detail the best management practices (BMP) for stormwater quality that will be implemented and maintained by the applicant during construction as well as after the project is completed. Appropriate and acceptable erosion control and sediment controls BMPs are defined in the City's subdivision regulations and engineering specifications. The Urban Drainage and Flood Control Dist. Is also a good reference. The City currently requires, through these specifications, developers prepare and include engineered drainage plans that address post-construction drainage conditions. This BMP is implemented at the plan review stage by the Public Works and Engineering Departments.
- **Stormwater Management Plan.** This plan will detail the types of erosion controls and stormwater quality BMP measures that will be implemented, as well as identify the locations.

- **Recommended Training for Construction Site Operators.** Along with the SWMP, the City will also include information regarding the erosion control class currently offered at Red Rocks Community College. This training is recommended. See resource guide for information on Red Rock Community College. The resource list will be updated as needed for information on upcoming trainings.

~~The applicant shall submit a completed Stormwater Management Plan (SWMP) and permit to the City of Montrose Community Development. The City Engineer will conduct a review of all documents associated with the SWMP for completeness and the Erosion Control Plans for feasibility and compliance to City regulations.~~

~~Once the City Engineer has approved the appropriate documents, Construction must begin within six months of the construction permit application approval date. of the approval date.~~ If the development or capital improvement project does not begin construction within six months of the approval date, the applicant must submit a new SWMP **to the City** for review **and approval**. The above procedures will be implement in year 1 – by December 31, 2003.

4.3 Construction Site Inspections

The purpose of construction site inspections is to determine if the Erosion control Plan has been followed, the BMPs have been properly maintained, and to check if additional erosion control measures are necessary.

Scope: The permittee or designated inspector for the development or capital improvement project is required to perform a site inspection at least once every two weeks to ensure that all approved BMPs are constructed in accordance with the approved SWMP. The Contractor will obtain inspection records for the City's review upon request. A City Inspector will inspect the site periodically and after a significant rainfall. This inspection involves a review to determine if the specified BMPs are in place and conform to the approved SWMP and Erosion Control plans. Some circumstances under which a construction inspection would be conducted include:

- a. Initial inspection of a construction site;
- b. To address complaints;
- c. During or after a major storm event to determine if the BMPs worked and/or determine if maintenance is needed;
- d. When a City Inspector returns to a site to verify that required corrective actions have been taken;
- e. Verify that proper maintenance is taking place;
- f. Follow up to a site inspection when the City Inspector traces an off-site problem;
- g. When previous site inspections have given the City reason to believe that the plan is not being implemented and/or the inspection reports have not been addressed;
- h. When determined necessary by the City.

Results of the permittee's bi-weekly inspection are noted on the Erosion and Sediment Control Inspection Checklist. It is the permittee's responsibility to provide this bi-weekly report to the City upon request. If the permittee fails to provide the inspection checklist, enforcement procedures may be invoked. Construction site inspections will be implemented in year 1 – by December 31, 2003.

4.4 Construction Site Enforcement

It is the City's intent to work with permittee, developers, contractors, and property owners when problems arise at construction sites. Our goal is to assist the applicant selecting possible BMPs and encourage proper maintenance. The City's ordinance provides the legal authority for requirements and prohibitions. The storm water ordinance simply states, "No person shall release or cause to be released into the storm drainage system any discharge that is not composed entirely of uncontaminated storm water..." as well as provide the legal authority for identification and enforcement of any such violations. The City's subdivision regulations addressing drainage controls for development and post-construction (an existing BMP) are implemented at the plan review stage by the Building and Planning Department, Public Works Department and the Engineering Department. The city will provide a guideline for site construction BMPs. Enforcement actions by the City will be taken when other means of getting the site into compliance have been unsuccessful. Please note that enforcement actions during the construction phase are different than the post-construction enforcement procedures.

Scope: Construction phase enforcement begins when deficiencies are present at the existing construction site. The City may impose the following enforcement actions in the listed order:

1. Verbal warning to contractor detailing requirements for compliance;
2. Stormwater compliance form to contractor stating problems and solutions;
3. Notice of violation letter with deadline to comply with Stormwater Management Plan and/or Erosion Control Plan will be given to the project owner and/or permittee;
4. Issuance of a red tag (stop work order).

The Stormwater Discharge Permit requires the erosion control measures be properly installed, maintained, and removed. All correspondence relating to noncompliance is routed to the signatories on the permit and the know contractor on site at the time of violation. Enforcement will be implemented in year 1 – by December 31, 2003.

4.5 Education and Training Programs for Construction Site Operators

The City of Montrose Construction Site Operators program consists of three elements. These elements include encouraging contractors to attend the Red Rocks Community College course or other applicable training, a one-on-one instructional course arranged by the City of Montrose or a one-on-one training as part of the regular site inspections.

Scope: Red Rocks Community College offers an erosion class aimed at construction contractors. The purpose is to educate them on the technical and regulatory requirements for sediment and erosion control. The City will encourage individuals to participate in a course by providing them information when they receive the Site Construction packet. The Red Rocks Community College information is available in the “Resource List”. The Resource List will be updated as needed on training centers available in our area.

The City will use its compliance and site inspections as an opportunity to educate contractors. When problems are found, the City Inspector will use the findings as an opportunity to inform the operator of efforts that could have been taken to avoid the problem and measures that may be taken to prevent a recurrence. This would be considered one-on-one training.

A one-on-one instructional course arranged by the City of Montrose or a one-on-one training as part of the regular site inspections will be offered through the City. The training consists of information and direction to developers and contractors regarding stormwater quality as it relates to construction, examples of BMPs, Spill Prevention and Response Procedures. This training will also inform the participants about the ordinances, regulations, policies, and procedures in place so they may remain in compliance. These trainings will be offered on an ongoing basis as needed. ~~The Education Program part of this minimum measure not only is intended to instruct participants in BMP implementation to protect water quality, but~~ The training will be available to any interested party. City training program will be implemented in year 2 – by December 31, 2004.

Measurable Goals

The City currently requires, through subdivision regulations and engineering specifications, developers prepare and include engineered drainage plans that address post-construction drainage conditions. This BMP is implemented at the plan review stage by the Public Works and Engineering Departments. Other BMPs and their measurable goals include:

- a. Developing non-structural BMPs to ensure adequate post-construction site runoff controls are implemented and maintained. There are many opportunities to establish effective controls for post-construction runoff without requiring some additional structures to be built. Proper planning and design of a building site can include features that reduce the amount of runoff after construction is complete. Measurable goals include:
 - i) Number of developers and engineers trained;
 - ii) Number of informational materials created and distributed;
 - iii) And, Number of non-structural BMPs in place.
- b. Developing structural BMPs to ensure adequate post-construction site runoff controls are implemented and maintained.

For additional Measurable Goals Table – See Attachment A

Section 5.0 Post-Construction Stormwater Management

General Information

Post-construction stormwater runoff from residential, commercial, and industrial areas has been shown to significantly affect receiving water bodies. Impervious areas increase runoff rates and decrease natural infiltration of runoff into the subsurface. During wet-weather conditions, flow runoff will collect harmful pollutants from urban areas and deposit them in receiving water bodies.

Regulations will be established that will require the permittee to develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb 1 or more acres, including projects less than 1 acre that are part of a common plan of development. Program requirements will include developing and implementing strategies that embrace a combination of structural and non-structural BMPs, a regulatory mechanism to require post-construction BMPs to be implemented in new developments and redevelopments, and adequate long-term operation and maintenance of BMPs. Appropriate and acceptable erosion control and sediment controls BMPs and post construction BMPs are defined in the City's subdivision regulations and engineering specifications. City staff is assigned to routinely and regularly inspect the installation and final acceptance of such installed BMPs. A typical non-compliance issue related to the installation, operation and maintenance of such a BMPs may not be limited to water quality issues such as sediment removal, but also to health related issue such as ponding water in detention cells where mosquitoes can breed. The Urban Drainage and Flood Control Dist. is also a good reference. Post construction runoff control includes such activities as storm drainage system maintenance, street sweeping, and maintenance/cleaning of oil water separators and filter systems.

The objectives of the Post-Construction Runoff Control component of the Storm Water Program is amended to reduce the potential for discharge of pollutants into urban runoff from new development and redevelopment. To meet this objective, the requirements of the Post-Construction Runoff Control component of the Storm Water Program are to:

- a. Require through ordinance or regulatory framework, the implementation of post-construction runoff controls.
- b. Develop appropriate structural and non-structural BMP strategies to address post-construction runoff.
- c. Ensure adequate and long-term maintenance of controls.
- d. Determine appropriate BMPs and measurable goals to meet these requirements.

Goal Statement

The goal of the Post-Construction Runoff Program is to develop, implement, and enforce procedures and controls to reduce the discharge of pollutants after construction is complete. This program will be developed with the following objectives in mind:

- Improve the water quality of storm runoff to a maximum extent practicable;
- Prevent accumulations of soil and debris in the storm sewer system of the City of Montrose;
- Prevent discharges of chemicals, chemical wastes and other pollutants from leaving existing developed sites;

To attain these objectives, multiple policies will be implemented to provide guidance and compliance to the EPA's Stormwater Phase II Final Rule. The programs listed below include general information about the proposed regulatory mechanism, the Stormwater Discharge Plan Application, inspection procedures, and enforcement.

5.1 Proposed Regulatory Mechanism

The purposes of this Stormwater Ordinance is to give the City the authority to safeguard persons, protect property, and prevent damage caused by illicit discharges to the environment.

Scope: The City Attorney's office has prepared a rough draft of the stormwater ordinance in which the City Council will review and comment. The stormwater ordinance will allow the City to identify and monitor illicit discharges as well as enforce penalties. The rough draft of the stormwater ordinance will be presented to City Council in April 2003. The final draft will be presented to the City council in year 1 – by December 31, 2003.

5.2 Post-Construction Site Inspection

The purpose of post-construction site inspections is to ensure adequate long-term operation and maintenance of BMPs. Post-Construction BMPs will be monitored and tracked through the final acceptance letter (issued subsequent to one year inspection of the development) of the drainage improvements related to site development. The City will maintain a file of all post-construction BMPs implemented within the City limits. This information is necessary to demonstrate compliance with the permit requirement to ensure long-term operation and maintenance of these BMPs. Based on the size of the City of Montrose, funding for the development, implementation, and management of a tracking system for post-construction BMPs is not a current viable option for the City. Therefore, the City must rely on public input and field inspection of facilities to ensure long-term operation and maintenance of such BMPs to meet the MEP criteria.

Scope: The City will perform citywide post-construction site inspections annually to ensure that all approved BMPs are maintained in accordance with the approved Stormwater Management Plan. This inspection involves a review to determine if the specified BMPs are in place.

Some circumstances under which a compliance inspection would be conducted include:

- a. Regular annual inspections;
- b. To address complaints
- c. During or after a major storm event, to determine if the BMPs worked and/or determine if maintenance is needed;
- d. When City staff return to a site to verify that required corrective actions have been taken;
- e. Verify that proper maintenance is taking place;
- f. Follow up to a site inspection when the City Inspector traces and offsite problem;
- g. When determined necessary by the City.

Results of the annual inspection are noted on the BMP Inspection Checklist. Post-Construction site inspections will begin in the year 3 – by December 31, 2005.

5.3 Post Construction Site Enforcement

It is the City's intent to work with property owners, homeowners associations, and business owners associations when problems arise. Enforcement actions by the City will be taken when other means of getting the site into compliance have been unsuccessful. Please note that enforcement actions during the post-construction phase are different than the construction site enforcement procedures. The City's ordinance provides the legal authority for requirements and prohibitions. The storm water ordinance simply states, "No person shall release or cause to be released into the storm drainage system any discharge that is not composed entirely of uncontaminated storm water..." as well as provide the legal authority for identification and enforcement of any such violations. The City's subdivision regulations addressing drainage controls for development and post-construction (an existing BMP) are implemented at the plan review stage by the Building and Planning Department, Public Works Department and the Engineering Department.

Scope: The post-construction phase enforcement begins after projects have been accepted final by the City. Over time, deficiencies may become present on a developed site. The City may impose the following enforcement actions;

1. Verbal warning to property owner/HOA/BOA detailing requirements for compliance;
2. Letter of non-compliance is given to the property owner/HOA/BOA;
3. Notice of Violation letter with deadline to comply with Stormwater Management Plan is given to the property owner/HOA/BOA;
4. Charge back to owner/HOA/BOA for value of work completed by the City of Montrose;
5. Or, apply a lean on the property involved.

The Stormwater Ordinance will require the permanent BMPs to be properly maintained by the owner. Post- construction enforcement will be implemented in year 1 – by December 31, 2003.

Measurable Goals

The City currently requires, through subdivision regulations and engineering specifications, developers prepare and include engineered drainage plans that address post-construction drainage conditions. This BMP is implemented at the plan review stage by the Public Works and Engineering Departments. Other BMPs and their measurable goals include:

- c. Developing non-structural BMPs to ensure adequate post-construction site runoff controls are implemented and maintained. There are many opportunities to establish effective controls for post-construction runoff without requiring some additional structures to be built. Proper planning and design of a building site can include features that reduce the amount of runoff after construction is complete. Measurable goals include:
 - i) Number of developers and engineers trained;
 - ii) Number of informational materials created and distributed;
 - iii) And, Number of non-structural BMPs in place.
- d. Developing structural BMPs to ensure adequate post-construction site runoff controls are implemented and maintained.

For additional Measurable Goals see Attachment A

Section 6.0 Pollution Prevention/Good Housekeeping for Municipal Operations

General Information

The program will inform public employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations; and prevent and/or reduce storm water pollution from facilities such as streets, road, municipal parking lots, maintenance and storage areas, snow disposal areas, waste transfer stations, and new construction of municipal facilities.

The City will accomplish this by developing and implementing training, operation, and maintenance programs for parks and open space, fleet and building, construction and land disturbances, and stormwater system maintenance.

Goal Statement

The goal of the Pollution Prevention/Good Housekeeping Program is to prevent or reduce pollutant runoff from municipal operations into the storm sewer maintenance.

6.1 Municipal Facilities Stormwater Quality Plan

The purpose of this plan is used to prevent/reduce pollutants in stormwater runoff at municipal sites. The City of Montrose is unique in that it owns and operates its own hot mix batch plant. The City's street maintenance program consists of identifying and prioritizing the City's road system for maintenance and replacement. Asphalt millings are stockpiled in an enclosed yard where no runoff occurs. The City maintains a concrete collection sump (pond, described in Program Area Section 6.1, item 7) that traps dust particles from the asphalt batch plant. The asphalt plant runoff is contained in an earthen sediment pond. Both ponds are pumped via vacuum truck and hauled to the POTW for disposal. The City also owns street sweepers, which run on a regularly scheduled street sweep program throughout the City, thus eliminating thousands of pounds of solids per year from entering the storm sewer system.

During street maintenance operations, the crew installs barriers to eliminate the pollutants from entering the storm sewer system. The work area is kept clean during and after the maintenance is performed by street sweepers.

The City will develop and implement formal procedures to minimize pollution from all maintenance projects. These procedures will be included in the municipal facilities storm water quality plan, which will be implemented by December 31, 2005. This plan will be developed to provide a stormwater quality plan for the following facilities:

- Streets, roads and highways **maintenance**
- City parking lots
- Maintenance and storage yards

- Fleet and maintenance shops
- Salt/sand storage locations
- Snow disposal areas
- Waste transfer stations

Scope: In order to initiate the Municipal Stormwater Quality Plan, it is recognized by the City that multiple structural and non-structural BMPs will need to be in place. The stormwater quality management components associated with the MFSQP is as follows:

1. *Preventative Maintenance* – requires yearly scheduled maintenance, scheduled inspections, and nonscheduled maintenance. These procedures will reduce potential pollutants in stormwater discharge by denying stormwater access to substances that could migrate with the stormwater;
2. *Good Housekeeping* – procedures for the facilities include developing and adhering to a routine schedule for clean-up of the facilities, scheduled maintenance, and posting signs and labels on storage areas and areas where spills might occur;
3. *Spill Prevention and Response Procedures* – procedures for the facility include material storage procedures, loading/unloading of liquids or solids, preventative inspection of liquid containers, and correct vehicle positioning for materials transfer. Spill response procedures include identification of procedures and equipment for spill containment, manual clean-up procedures or removal by vacuum or pump systems, and the use of absorbents or gelling agents. These procedures will reduce potential pollutants in stormwater discharge;
4. *BMPs for Pollutant Sources* – procedures for the facility include the use of BMPs for exposure minimization to storm runoff, and flow diversion practices. It is also to include the use of BMPs associated with fueling, maintenance, painting, washing, loading and unloading, storage, and proper waste disposal practices;
5. *Employee Training* – to inform City employees of the impacts associated with illegal discharges, proper recycling and disposal of wastes from municipal operations, and proper installation and maintenance of BMPs.
6. *Waste Oil Tank* – the proper barrier will be installed to prevent any possible leaks that might occur.
7. *Asphalt Batch Plant* – The Batch Plant is in operation during the summer months. We have a pond that traps sediment from entering the storm drain. We will continue to take measures to protect and eliminate discharges into the system.

The Municipal Facilities Stormwater Quality Plan will be implemented in year 3 – by December 31, 2005.

6.2 Municipal Facilities Inspections

To ensure the MFSQP is implemented correctly, inspections of the municipal facilities must be conducted. Formal site inspections will be performed in accordance with the MFSQP using the Municipal Facility Stormwater Quality Inspection form. A visual inspection of each facility site and discussions with the manager or supervisor of the facilities will be conducted by the City Engineer or designated staff.

Scope: The site inspections will consist of reviewing each facility to determine that the following BMPs are being implemented:

- Preventive Maintenance
- Good Housekeeping
- Spill Prevention and Spill Response
- Fueling Practices
- Equipment Maintenance Practices
- Equipment Painting Practices
- Equipment Washing Practices
- Loading and Unloading Materials Practices
- Liquid Storage in Above-Ground Tanks Practices
- Outside Storage Practices of Raw Materials
- Proper Waste Disposal
- Employee Training

Copies of the completed inspection forms will be kept on file with the City Engineers Department. The Municipal Facility Stormwater Quality Inspection forms will be submitted to the Colorado Department of Public Health and Environment, Water Quality Control Division, upon request.

The City's Engineer will submit an annual report on the overall conformity of the facilities with the MFSQP as directed by the state. Copies of the inspections and annual reports will be kept at the City Hall with the Record Clerk for three years, in accordance with the Federal and State regulations. The Municipal Facilities inspections will be implemented in year 4 – by December 31, 2006.

6.3 Municipal Employee Training

In addition to Municipal Facility Inspections, the City will conduct in-house employee training sessions and participate in training offered by the EPA, state, or other relevant organizations to ensure the MFSQP is implemented correctly. The City Engineer or designated staff will assure that each department will conduct training associated with the maintenance activities for which it is responsible.

Scope: Employee training will include training on how to incorporate pollution prevention/good housekeeping techniques into municipal operations such as park and open space maintenance, fleet and building maintenance, and stormwater system maintenance. Employee training will be implemented in year 3 – by December 31, 2005.

6.4 Semi-Annual Safety Meetings

To assure that each department is knowledgeable in safety issues and stormwater topics, meetings will be conducted semi-annually.

Scope: The City of Montrose Public Works Department will conduct semi-monthly safety meetings within each department. Each Department head will organize the meeting for their staff. These meetings will explore options to include stormwater topics and all related issues. The meetings will be implemented in year 2 – by December 31, 2004.

Existing Programs In Pollution Prevention/Good Housekeeping for Municipal Operations

6.5 Roadway, Drainage way, and Storm Sewer Maintenance

To assure that roadways, drainage ways, and the storm sewer system is free of debris and sediment, the City provides street sweeping 5 days a week, storm sewer, and waterway maintenance with the City of Montrose.

Scope: The City's existing street and storm sewer programs provide street sweeping services to assist in keeping the drainage system clean. The City also cleans, repairs and maintains the City's storm sewer system and drainage ways, and constructs minor improvements as needed to assure adequate drainage of stormwater year-round. The street sweeper semi-annually cleans the sumps in storm water inlets. These maintenance programs will continue within the Public Works Department.

6.6 Spring Clean up

The City of Montrose currently provides a Spring Clean-up. This is advertised previous to the event in the local newspaper, television, web site and radio. Each household that would like to participate contacts City Hall staff to set up a pickup for their items too big for the regular trash pickup.

Scope: This event is held annually in the spring, typically in April or May. The City will continue this clean up on a yearly basis.

6.7 Fall Leaf Clean up

The City of Montrose has a fall leaf drive. This is available to the City of Montrose residents to allow cleanup of leaves. Residents contact City Hall to set up a pickup for leaf bags.

Scope: This event is held annually in the fall, typically in October and November. The City will provide leaf bags upon request, available at City Hall.

Measurable Goals

For Measurable Goals see Attachment A