

***City of Mount Vernon
NPDES Phase II Ohio Facility Permit 4GQ00028*BG
Program Years 2014-2018
Storm Water Management Plan (SWMP)
Program Update***



Mount Vernon

The City of Mount Vernon, Ohio

Rev December, 2014

Introduction

This document outlines City of Mount Vernon goals and objectives in implementing and enforcing a Storm Water Management Program (SWMP) to reduce pollutants discharged into nearby water systems, to protect water quality to and to meet requirements of the Clean Water Act per NPDES Phase II Permit Facility Number 4GQ00028*BG.

This SWMP covers all areas within Mount Vernon corporation limits, an area of 10 square miles and a population of 16,990 (the 2010 census). The City of Mount Vernon lies in the Glaciated Allegheny Plateau and is surrounded by rolling hills and valleys. The Kokosing River and U.S. Route 36 pass through the city. The City's elevation is approximately 1000' above MSL.

This SWMP will address the six minimum control measures necessary to meet the requirements for the NPDES Phase II Permit from 2014-2018. It will be updated regularly.

This document, completed in late 2014 is an update to the City's Storm Water Management Plan Phase II originally prepared in April 2007. The updates primarily reflect the new MS4 requirements that resulted from the new generation NPDES MS4 Permit OHQ000003 issued September 11, 2014. The revisions proposed are fairly minor and update items that have changed or been completed thus far within the program term.

To the right is an image of a November 20, 2014 letter from the OEPA Director, received by the City of Mount Vernon, acknowledging Small MS4 permit coverage. It is our understanding that the City of Mount Vernon is an "Appendix 7" MS4 – an MS4 area having a population greater than 10,000 people and a population density of 1,000 people per square mile, but not in the major urban areas - added to the overall permit program later in the process. As such, the MS4 permit requirements for the Mount Vernon MS4 begin as of the date of this letter.

Evaluation, Record Keeping and Reporting

The City of Mount Vernon, in accordance with NPDES Phase II requirements will conduct yearly evaluations of program compliance, the appropriateness of identified BMP's, and progress toward achieving identified measurable goals and satisfying performance standards.



November 20, 2014

CITY OF MOUNT VERNON
DAVID C GLASS
40 PUBLIC SQUARE
MT VERNON

OH 43050

RE: Approval for coverage under Ohio EPA NPDES General Permit
STORM WATER ASSOCIATED WITH **SMALL MS4 NOI**

OHQ000003
odnr number: if
applicable

Dear Applicant:

The Ohio Environmental Protection Agency has received a Notice of Intent for coverage under the above referenced general permit for :

CITY OF MT VERNON
40 PUBLIC SQUARE

County: Knox
City: MT VERNON

Ohio EPA Facility Permit Number: 4GQ00028*BG

Estimated Disturbed Acreage

This site/facility is approved for coverage under the above referenced Ohio EPA general permit. Please use your Ohio EPA facility permit number in all future correspondences.

Please familiarize yourself with your general permit. The permit contains requirements and prohibitions with which you must comply. Coverage remains in effect until a renewal general permit is issued and Ohio EPA has contacted you in writing about submitting a new NOI for continuing coverage.

For Coal Surface Mining Permittees enclosed are Monthly Operating Report (MOR) forms for your use.

Program contacts:

Construction : Mike Joseph (614) 752-0782 michael.joseph@epa.state.oh.us
MS4 / Marina / Alt.Const : Jason Fyffe (614) 728-1793 jason.fyffe@epa.state.oh.us
MS4 / Industrial : Anthony Robinson (614) 728-3392 anthony.robinson@epa.state.oh.us

You may obtain a copy of copy of OHR000005, information and forms from our web site at:
<http://www.epa.ohio.gov/dsw/storm/stormform.asp>

Ohio EPA has developed a customer service survey to get feedback from regulated entities that have contacted Ohio EPA for regulatory assistance, or worked with the Agency to obtain a permit, license or other authorization. Ohio EPA's goal is to provide our customers with the best possible customer service, and your feedback is important to us in meeting this goal. Please take a few minutes to complete this survey and share your experience with us at <http://www.surveymonkey.com/s/ohioepacustomersurvey>

Thank you for your cooperation in this matter.

Sincerely,

Craig W. Butler
Director

The City retains copies of reports required by this permit, a copy of the NPDES permit itself and records of pertinent data. These records are kept in the office of the City Engineer. These are public records, and as such will be made available to the public upon receipt of request.

Annual reports are submitted on April 1 following the end of each year of the permit cycle. The Ohio EPA provided format is used. The reports include:

- Table of Organization for program development and implementation, with primary contact information.
- The status of compliance with the permit conditions and performance standards, assessment of the appropriateness of Minimum Control Measures (MCMs), assessment of achievement of the goals, progress toward reducing the discharge of pollutants to the maximum extent practical (MEP) and the measurable goals for each of the six required MCMs. The report includes summaries of the specific annual reporting requirements identified for each MCM.
- Results of information collected and analyzed during the reporting period, including monitoring data used to assess the success of the program.
- A summary of the storm water activities the City plans to undertake during the next annual reporting cycle, including a planned implementation schedule.
- Any proposed changes to the City's SWMP including changes to any BMP's or any identified measurable goals that apply to the program elements.
- The annual reports will be signed by the City Engineer, or his designated authorized representative. Authorization of a representative must be only for a person having responsibility for the overall operation of the regulated facility or activity, and will be submitted to the Ohio EPA.

Responsible Parties

The City Engineer will serve as the administrator of Mount Vernon's Storm Water program and is the primary contact. The Safety-Service Director is also closely involved with all aspects of the program. As appropriate, the Street Superintendent, Administrator of Billing and Customer Service, the Public Parks, Public Buildings and Land Administrator, the Cemetery Superintendent and the Law Director will provide additional assistance. The City intends to continue to work with the Knox Soil and Water Conservation District and the Knox County Health Department, and The Kleingers Group will serve as the City's consultant for the Storm Water program.

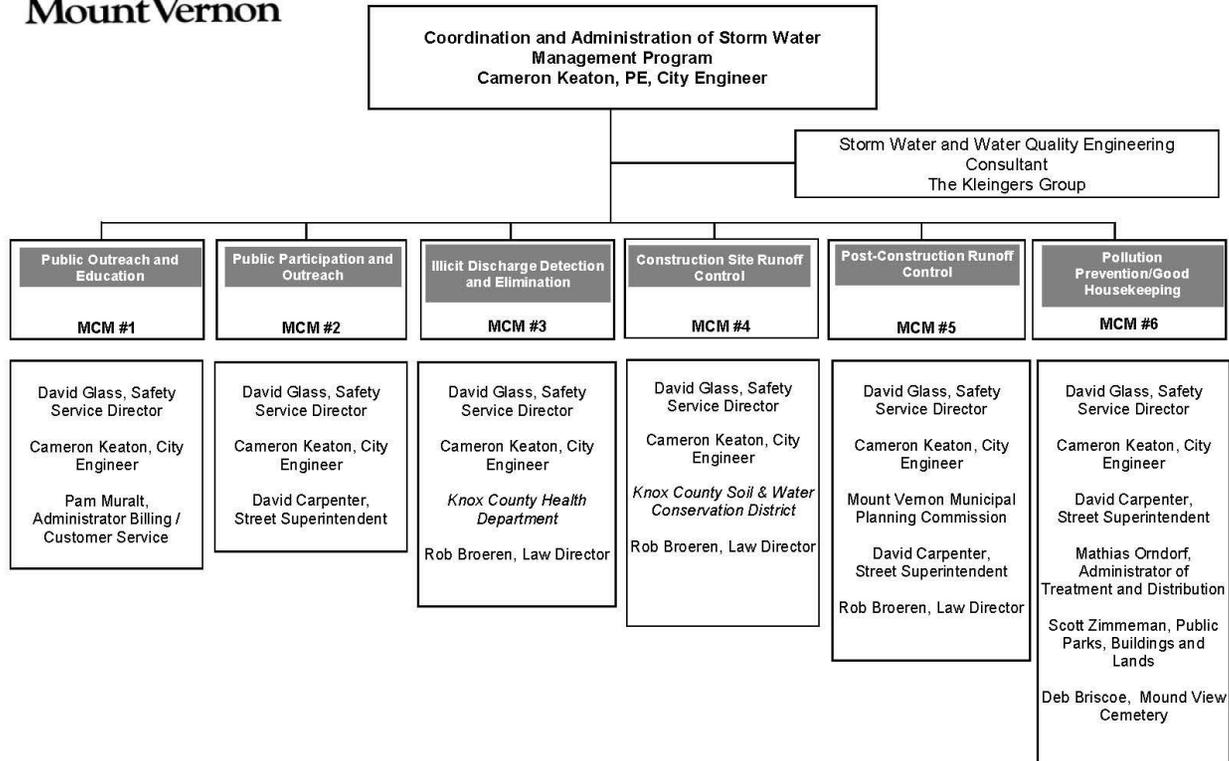
Refer to the organizational chart on the following page, along with the following text for details of individual roles within the program.



The City of Mount Vernon

Attachment A

Storm Water Management Program Organizational Chart
updated December '14



| | | | |
|------------------|---|---------------------------------------|--------------|
| Cameron Keaton | City Engineer | engineer@mountvernonohio.org | 740.393.9528 |
| David Glass | Safety Service Director | mtvsd@mountvernonohio.org | 740.393.9520 |
| David Carpenter | Street Superintendent | mtvstreet@mountvernonohio.org | 740.393.9501 |
| Pam Muralt | Administrator Billing / Cust Service | pmuralt@mountvernonohio.org | 740.393.9504 |
| Mathias Omdorf | Administrator of Treatment and Distribution | treatdistadmin@mountvernonohio.org | 740.393.9502 |
| Scott Zimmerman | Public Parks, Public Buildings and Lands | mtvpb1@mountvernonohio.org | 740.393.9577 |
| Rob Broeren | Law Director | lawdirector@mountvernonohio.org | 740.393.9562 |
| Deb Briscoe | Mound View Cemetery | moundviewcemetery@mountvernonohio.org | 740.393.9581 |
| Jennifer Knittle | Consultant - The Kleingers Group | jennifer.knittle@kleingers.com | 614.882.4311 |

Storm Water Management Program

This plan outlines the six MCMs required for the SWMP as listed below.

1. Public Education and Outreach
2. Public Involvement / Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention / Good Housekeeping for Municipal Operations

MCM 1 through MCM 6 Compliance

The City of Mount Vernon's planned activities related to each of the six MCMs for the remainder of the permit term are addressed in this report. The activities are addressed as specifically as possible with emphasis on the OEPA's performance measures per the most recent generation of the permit. Items presented in the 2014 SWMP have been revised to address the new requirements. The overall plan for each MCM is presented in tabular form in OEPA annual report form for ease of use.

MCM 1 - Public Education and Outreach

The City of Mount Vernon will continue to use a mix of BMPs to address MCM 1. This MCM requires targeting homeowners, school children and commercial/industrial business owners (including restaurants) with educational materials. The City is not known to have major problems with pollutants contained in storm water runoff, however, it is understood that public outreach helps counteract increased impacts on the quality of the environment within our corporation limits as growth and development occur.

Now that the Mount Vernon MS4 program has been in place and the new generation permit is issued, the City has chosen to modify its MCM1 activities to focus its resources in a more targeted way to key audiences with multiple specific messages as required by the permit. This approach would be expected to be more impactful and cost effective than the previous approach due to its targeted nature. This plan is reflected in Table 1 below.

Resources available to the City to apply toward this effort include a City website. There are also methods of direct distribution of materials that may be employed for MCM #1 through City offices and via community leadership (civic) organizations. As practical, the City of Mount Vernon may also participate in local festivals, with booths, informational brochures and literature being distributed and displayed. This may be part of MCM 1 or MCM 2.

The Mount Vernon City School District will also be targeted with MCM 1 activities. It is hoped that the Knox County Soil and Water Conservation District will be available to help in the implementation of this measure with classroom presentations regarding storm water runoff and proper pollution prevention and other programs they currently offer.

TABLE 1 – MCM 1 (Public Education and Outreach) PERMIT PLAN

| BMP (mechanism) & Responsible Party | Measurable Goal | Theme or Message | Target Audience | % of Target Audience to be Reached | Summary of Planned Activities | Proposed Schedule |
|---|--|--|---|------------------------------------|--|---|
| Distribute educational Information for local public education - <u>hard copy media</u> | Provision of information to the public through flyers, brochures, utility billing inserts) to build Awareness of Storm Water and Water Quality benefits within the Mount Vernon area | 1 Storm Water Management Plan (incl 6 MCMS) | 1 General Public | To the Maximum Extent Practical | 1 The SWMP available to public at City offices and linked (hard copy media) on web page (internet media). 2. Targeted brochure | 1 Ongoing |
| Safety-Service Director City Engineer | | 2 Water quality | 2 General Public | | | 2 Once/year |
| | 3 Storm water management regulations and permitting | 3 Developers / Consultants | | | | |
| | 4 Illicit Discharge, Detection and Elimination | 4 General Public | | | | |
| | 5 Home Sewer Treatment Systems | 5 General Public | | | | |
| Distribute educational Information for local public education - <u>internet media</u> | Build Awareness of Storm Water and Water Quality Benefits within the Mount Vernon area through City's web page | 1 Storm Water Management Plan | All web site visitors. Two primary focused groups would be the general public (re the Storm Water Management Plan) and Developers / Consultants (re Storm Water Management regulations and permitting) | To the Maximum Extent Practical | Web site improvement to include the general public and the development community through web site information. | Ongoing – schedule to mirror the hard copy media schedule Immediate focus as noted in Target Audience Column |
| Safety-Service Director City Engineer | | 2 Water quality | | | | |
| Educational Curriculum Material in City School System | Elementary School Classroom Education | 1 Storm Water Management Plan | Providing storm water education at schools reaches not only to students but parents also | To the Maximum Extent Practical | Partner with educators to implement storm water-related programs for the classroom – themes will be as appropriate, possibly based on those in the themes column | Ongoing – minimum once annually |
| Safety-Service Director Knox Co SWCD | | 2 Water quality | | | | |
| | | 3 Litter | | | | |
| | | 4 Pet Waste | | | | |
| | | 5 Car Washing | | | | |
| Community Meetings | Provide storm water education information to local community groups (e.g – Lions or Rotary) | Storm Water Master Plan, Water Quality, IDDE | Businesses Owners and Community Leaders | To the Maximum Extent Practical | Lunch presentation with "take away" literature | Ongoing – once annually |
| Safety-Service Director City Engineer | | | | | | |

MCM 2 - Public Involvement / Participation

The City of Mount Vernon continues its commitment to increasing public involvement and participation as one of the key components of its SWMP. The more public involvement that can occur in the early stages, the less chance the City takes in dealing with potential future challenges.

Methods and BMPs noted in previous plans included Storm Drain Stenciling, an Adopt-A-Stream Program, and establishing / maintaining a Storm Water Advisory Team (SWAT). The MCM 2 section of the 2007 SWMP also references City Ordinances, Public Hearings, Public Hearings, Annual Storm Water Meetings, and Watershed Organizations.

The City proposes to modify the 2007 MCM 2 BMP by employing a defined and more focused approach. The stenciling and stream programs remain in the plan, and have already been initiated. The remainder of the items will be rolled into the Storm Water Advisory Group BMPs. Details are reflected in TABLE 2 - MCM 2 PLAN below. These details are subject to review as the SWAT develops and organizes its activities.

TABLE 2 – MCM 2 (Public Involvement / Participation) PERMIT PLAN

| BMP (Activity) & Responsible Party | Measurable Goal | Theme or Message | Target Audience | Estimate of People to Participate | Summary of Planned Activities | Proposed Schedule |
|--|---|---|---|--|---|--|
| <p>Storm Water Advisory Team (SWAT)</p> | <p>Build and maintain local involvement and participation efforts in the Mount Vernon Community through public involvement.</p> <p>Raise citizen awareness of water quality and allow for public participation.</p> | <p>Maintaining public awareness in watershed based activities in Mount Vernon through focused and hands-on participation.</p> | <p>General Public and Businesses</p> | <p>Team members:</p> <ul style="list-style-type: none"> ▪ City Engineer ▪ Safety Service Director ▪ Superintendents of Water and Wastewater, Parks, Streets, etc. ▪ Knox SWCD <p>Other to the extent practical</p> | <ol style="list-style-type: none"> 1. Participation in local Watershed Group – Brown Family Environmental Center 2. Participate in Annual Stream Cleanup – partner w/ODNR, Brown Family Environmental Center, Knox County Parks and DKM Solid Waste District 3. Participate in annual Kenyon College Earth Day event | <p>Maintain ongoing activity as necessary</p> |
| <p>Safety-Service Director City Engineer</p> | | | | | | |
| <p>Rain Garden Demonstration Project</p> | <p>Demonstrate to citizens within the MS4 what a rain garden is and how it benefits water quality, water quantity and the environment.</p> | <p>Rain gardens are an inexpensive, simple way to implement and environmentally sound solutions to urban storm water runoff. Rain gardens can filter runoff pollution, recharge groundwater, improve water quality, protect rivers and streams, remove standing water, reduce mosquito breeding, etc.</p> | <p>Residents of MS4.</p> | <p>To the extent practical</p> | <ol style="list-style-type: none"> 1. A demonstration rain garden project is in place at Hiawatha Park. 2. ASWIF grant was pursued and \$83,000 was awarded for rehabilitation of an existing parking lot within the City for potential BMPs near the CA&C Depot (good visibility). Building of the BMP is expected to include an educational plaque. | <ol style="list-style-type: none"> 1. Ongoing 2. 2015-2016 |
| <p>City Engineer</p> | | | | | | |
| <p>Public Input</p> | <p>Maintain availability of the City's storm water management plan to the public and allow easy opportunity for input and comment on the plan – hard copy and website.</p> | <p>Storm Water Master Planning, how it affects YOU</p> | <p>General public, residents and businesses</p> | <p>To the extent practical</p> | <p>Announce (on web site and in council meetings) that a copy of the storm water management plan is available for public comment. Make the plan available for public comment.</p> | <p>Ongoing</p> |
| <p>Safety-Service Director City Engineer</p> | | | | | | |
| <p>Storm Drain Inlet Stamping / Marking</p> | <p>Use volunteer groups and staff to stenciling drains. Record number of drains marked and number of participants.</p> | <p>Make residents aware of the connection between the storm system and neighborhood streams and the path of storm water runoff and the pollution carried with it from lawns and streets.</p> | <p>Residents of MS4</p> | <p>To the extent practical which should include concerned/active residents within City of Mount Vernon and possibly Boy and Girl Scouts and civic groups – consider stickers for easier participation</p> | <p>Continue to mark significant system drains have been marked within the MS4</p> | <p>Annual</p> |
| <p>Safety-Service Director, City Engineer, Street Superintendent</p> | | | | | | |

MCM 3 - Illicit Discharge Detection and Elimination (IDDE)

MCM 3 BMPs and activities outlined here are generally similar as outlined previously. This control measure will continue to involve City staff, the Knox County Health Department and possibly consulting engineers.

The City of Mount Vernon has storm sewers that may be susceptible to illegal dumping or unintentional contamination issues, such as car washing, oil and grease from restaurants, pet waste and household chemical spills. The City will work to locate pollutant problems through citizen complaints, visual screening and visual assessment in dry weather conditions.

Although many developments within the City are served by public water and sewer systems, some older homes are on larger lots in more rural type areas with home sewer treatment systems (HSTS). These systems are regulated and approved by the Health Department. The Health Department will be a key resource in identifying the locations of properly permitted HSTS, whether they outfall to the MS4, and their ongoing monitoring results.

As part of this plan, the City will work closely with the Health Department to locate possible HSTS that due to their age may have not been properly permitted in the past. The City will work to the extent practical with the Health Department to coordinate actions to ensure that systems are being monitored on a systematic basis and follow-up steps are taken to ensure illicit discharges to the MS4 are not occurring due to failed septic systems.

The City of Mount Vernon has completed an inventory of known storm water structures and point source discharges and will continue to update it as necessary. The City has created ordinances relative to prohibiting non-storm water discharges into its storm water system and will continue to modify them as necessary. This will include the enforcement and penalties associated with violations of these policies. The City must continue to explore whether it can establish policing authority allowing staff to enter parts of private property in order to alleviate and eliminate pollutant problems that may be illegally occurring along water ways.

As required by permit, annual reports will include progress on each of the MCM activities, as well as provide available data including: the number of outfalls dry-weather screened, the number of dry-weather flows identified, the number of illicit discharges identified, the number of illicit discharges eliminated, schedules for continued elimination of illicit connections that have been identified but have yet to be eliminated and a summary of updates to the storm sewer system mapping.

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 3.

TABLE 3 – MCM 3 (Illicit Discharge Detection and Elimination (IDDE)) PERMIT PLAN

| MCM 3 BMP & Responsible Party | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|--|--|---|---|
| <p>Ordinance or Other Regulatory Mechanism</p> <p>City Engineer Administrator of Treatment and Distribution City Law Director</p> | <p>Maintain/enforce City Ordinance 924.</p> | <p>3. Enforce the illicit discharges ordinance (post inventory).</p> | <p>3. Ongoing</p> |
| <p>Storm Sewer System Map</p> <p>City Engineer</p> | <p>Maintain storm system inventory that locates outfalls including catch basins, pipes, ditches, flood control facilities, and post construction best management practices</p> | <p>3. Update and edit stream database with new storm water system information. Review map of outfall locations.</p> | <p>3. Ongoing</p> |
| <p>HSTS Mapping and List</p> <p>City Engineer Know County Health Department</p> | <p>Develop a list showing addresses and the parcel ID's as available of all HSTSs and develop a map of on-site sewage disposal systems within the City</p> | <p>1. Perform records search and obtain a list of on-site sewage disposal systems from the Board of Health. 2. Map the location of all known home sewage treatment systems connected to the City's MS4. 3. Continue to update the map and list of HSTSs as information becomes available.</p> | <p>1. Ongoing 2. Ongoing 3. Ongoing</p> |
| <p>IDDE Plan</p> <p>City Engineer Administrator of Treatment and Distribution</p> | <p>Update/revise the plan to eliminate significant sources of pollution</p> | <p>1. Work with Board of Health to identify priority areas of that have significant sources of pollutants. 2. Develop an on-going IDDE plan and schedule that prioritizes illicit discharges for detection and elimination. 3. Develop a schedule of eliminating illicit connections to the storm sewer system.</p> | <p>Ongoing</p> |
| <p>Dry-Weather Screening of Outfalls</p> <p>City Engineer Administrator of Treatment and Distribution</p> | <p>Utilize Dry weather screening information from within the City per the IDDE Plan developed in above listed BMP</p> | <p>1. Collect water quality samples from all questionable outfalls for testing. 2. Identify potential sources of pollution. 3. Include this information in the City's system inventory.</p> | <p>1. 2015 2. Ongoing 3. Ongoing</p> |

MCM 4 - Construction Site Runoff Control

The City of Mount Vernon reviews construction storm water and grading plans prior to allowing construction to commence. The City Engineer and his staff check the adequacy of construction site runoff control as part of the site plan review process.

The City Engineer's staff responsibility includes performing on-site inspections during all phases of construction or any development affecting more than 1 acre of land disturbance. Per OEPA requirements, these are to occur at a minimum-at construction onset and at least monthly thereafter.

The City has adopted regulations within its Codified Ordinances requiring storm water management plans and construction activity that control erosion and sedimentation.

The ordinances have been modified to be consistent with the most recent generation OEPA Construction General Permit.

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 4.

Each annual report for this MCM includes and documents the number of applicable sites in the City of Mount Vernon, the number of pre-construction storm water pollution prevention plan reviews performed, the number and frequency of site inspections, the number of violation letters issued, the number of enforcement actions taken and the number of complaints received and number followed up on. This information is provided for the report by City Staff and reflected in the standard format report.

TABLE 4 – MCM 4 (Construction Site Runoff Control) PERMIT PLAN

| MCM 4 BMP & Responsible Party | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|--|---|--|-------------------|
| Ordinance or Other Regulatory Mechanism | . Maintain/enforce City Ordinance 920. | Coordinate the implementation of ordinance. | Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission City Law Director | | | |
| Sediment and Erosion Control Requirements | Maintain/enforce City Ordinance 920. | Coordinate the implementation of ordinance. | Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission City Law Director | | | |
| Complaint Process | Implement tracking of complaints. | Develop a system for receiving and processing complains received on a project specific basis as received by the engineering dept. (phone/email). | Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission City Law Director | | | |
| Site Plan Review Procedures | Review the process for pre-construction storm water pollution prevention plan review. Include all residential and commercial projects that disturb one or more acres. | Track the number of site plans reviewed. | Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission | | | |
| Site Inspection Procedures | Ensure construction sites are inspected to ensure compliance with SWP3's. | Track the number of construction sites within the City, the number of inspections performed, and the average frequency of inspections. | Ongoing |
| City Engineer | | | |
| Enforcement Procedures | Enforce City regulations. | Enforce City ordinances and regulations for all construction activity that disturbs one or more acres. | Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission City Law Director | | | |

MCM 5 - Post-Construction Storm Water Management in New Development and Redevelopment

City of Mount Vernon Public Works staff coordinates the plan review process to identify and manage the containment of runoff on-site as part of the site plan review process per OEPA requirements. As part of the staff's responsibility, on-site inspections will be conducted during construction as part of any development that disturbs one acre or more. The City will work to ensure that the approved site plan is adhered to in order to prevent post-construction runoff of pollutants. The City staff is responsible for general oversight of the development process and ensuring that long term operation and maintenance plans are enforced. This may be accomplished with annual inspections of the control structures or devices for operational integrity.

The City reviews and recommends the use of either detention or retention controls as appropriate with any new development to help control the rate at which water discharges off site, in compliance with the water quality standards of the OEPA NPDES permit. The City has updated its storm water management regulations and ordinances to address the management of post-construction runoff, to meet or exceed the technical requirements of the OEPA NPDES General Construction Permit.

The City will recommend "preferred" BMPs per OEPA, ODNR and ODOT guidance. Ultimately, constructed and accepted BMP's will be kept in a data base that includes the contact information and maintenance responsibility on the primary private operator of the site. The City will maintain these records. Failure by the owner to properly maintain or operate the BMP will be documented and followed up with.

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 5.

Annual reporting on MCM 5 by the City of Mount Vernon will include the number of applicable sites in Mount Vernon requiring post-construction controls, the number of pre-construction storm water pollution prevention plan reviews performed, the number of inspections performed to ensure as built per requirements are met, the number of long-term operation and maintenance (O&M) plans developed and the number of agreements in place.

TABLE 5 – MCM 5 (Post-Construction Storm Water Management in New Development and Redevelopment) PERMIT PLAN

| MCM 5 BMP & Responsible Party | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|--|---|---|--|
| Ordinance or Other Regulatory Mechanism | Maintain/enforce City Ordinance 920. | 1. Educate the development community as practical 2. Coordinate the implementation of ordinance. | 1. Ongoing 2. Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission City Law Director | | | |
| Post-Construction Requirements | Maintain/enforce City Ordinance 920. | 1. Continue to educate development community regarding approved BMPs 2. Continue to review and evaluate BMP alternatives | 1. Ongoing 2. Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission City Law Director | | | |
| Site Plan Review Procedures | Maintain/enforce City Ordinance 920. | 1. Review every site plan for post construction requirements. 2. Meet with developers and engineers during design process to encourage the use of non-structural BMPs / green infrastructure. 3. Report the number of sites / plans reviewed. | 1. Ongoing 2. Ongoing 3. Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission | | | |
| Site Inspection Procedures | All post construction (structural and nonstructural) BMPs will be inspected prior to acceptance of the project by the City to ensure the BMPs are functioning properly. | 1. Develop an inspection schedule for structural and nonstructural BMPs. 2. Report the number of sites inspected, number of inspections performed, and average frequency of inspections. | 1. Ongoing 2. Ongoing |
| City Engineer | | | |
| Enforcement Procedures | Maintain/enforce City Ordinance 920. | Enforce ordinance | Ongoing |
| City Engineer City Law Director | | | |
| Long-Term O&M Plans/Agreements | All sites will have an O&M plan. | 1. Enforce the requirement within the ordinances that requires projects to have and an operations and maintenance plan identifying responsibility for private BMP O&M. 2. Report the number of sites with agreements. | 1. Ongoing 2. Ongoing |
| City Engineer Mount Vernon Municipal Planning Commission City Law Director | | | |

MCM 6 - Pollution Prevention / Good Housekeeping for Municipal Operations

The City of Mount Vernon will continue / improve its efforts to prevent or reduce pollution from its municipal operations by several methods including:

- Routine maintenance of City vehicles will include inspection for leaks. Vehicle maintenance and washing will be conducted indoors whenever possible.
- City vehicle and equipment storage will be conducted in accordance with appropriate BMPs and Municipal facility SWP3s will be maintained as required.
- The Street Department will monitor and track its application of salt distributed along roadways during snow emergencies. As a matter of budget, the City attempts to minimize the amount of salt used.
- The City will continue training programs for street and utility personnel once per year. This practice will be continued as required per permit.
- City staff should minimize pest control and herbicide use on City owned properties, including City Parks.
- Any flood management projects proposed in the future (none are currently planned) to be carried out in or by the City will automatically be assessed for impacts on water quality during the review of the project by the City Engineer. They will conduct hydrologic analysis and review the scope of the project for the need for any additional water quality protection devices or practices and recommend those as appropriate.

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 6.

Each year the annual report shall include documentation and summary of employee training programs-the number of employees and others attended and a summary of activities implemented for the City's operation and maintenance program each year.

TABLE 6 – MCM 6 (Pollution Prevention / Good Housekeeping for Municipal Operations) PERMIT PLAN

| MCM 6 BMP & Responsible Party | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|--|--|---|---|
| <p>Employee Training Program</p> <p>City Engineer, Street Superintendent Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent</p> | <p>Train key staff on issues related to MS4 permit in general, possible emphasis on MCMs #3 and #6</p> | <p>1. Conduct In-house training of appropriate staff. 2. Distribute storm water information to employees</p> | <p>Ongoing / Annually</p> |
| <p>List of Facilities Subject to Program</p> <p>City Engineer, Street Superintendent, Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent</p> | <p>Maintain/review SW3Ps for subject facilities</p> | <p>Maintain and review SW3Ps</p> | <p>Ongoing</p> |
| <p>MS4 Maintenance</p> <p>City Engineer, Street Superintendent Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent</p> | <p>Maintain ongoing schedule for MS4 maintenance. Incorporate pollution prevention and good housekeeping techniques at municipal facilities. Ensure storm structures are maintained.</p> | <p>1. Develop schedule for cleaning catch basins 2. Summarize maintenance activities in the annual report.</p> | <p>1. Ongoing 2. Ongoing</p> |
| <p>Disposal of Wastes</p> <p>City Engineer, Street Superintendent, Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent</p> | <p>Properly manage and dispose of wastes</p> | <p>1. Maintain annual list of wastes disposed. 2. Document how wastes are disposed with amounts.</p> | <p>1. Ongoing 2. Ongoing</p> |
| <p>Road Salt</p> <p>City Engineer, Street Superintendent</p> | <p>Properly apply salt in a way that minimizes usage</p> | <p>Document tons of salt used each year.</p> | <p>Ongoing</p> |
| <p>Pesticide & Herbicide Usage</p> <p>City Engineer, Public Parks, Buildings and Lands Superintendent Mound View Cemetery Superintendent</p> | <p>Properly manage use of pesticides and herbicides.</p> | <p>1. Record existing pesticide and herbicide procedures. 2. Document amount of pesticide and herbicide used. 3. Develop procedures for reducing pesticide and herbicide use.</p> | <p>1. Ongoing 2. Ongoing 3. Ongoing</p> |
| <p>Fertilizer Usage</p> <p>City Engineer, Public Parks, Buildings and Lands Superintendent Mound View Cemetery Superintendent</p> | <p>Decrease use of fertilizer.</p> | <p>1. Documents general areas where fertilizer is applied. 2. Document amount of fertilizer used.</p> | <p>1. Ongoing 2. Ongoing</p> |
| <p>Street Sweeping</p> <p>City Engineer, Street Superintendent</p> | <p>Minimize trash, grits and other pollutants in the street which may be transferred to the storm sewer system.</p> | <p>Record amount of material collected and disposed.</p> | <p>Ongoing</p> |
| <p>Flood Management Projects</p> <p>City Engineer, Street Superintendent</p> | <p>Ensure storm water management is considered for all flood management projects.</p> | <p>Incorporate water quality protection devices.</p> | <p>Ongoing</p> |