

City of Baxter, Minnesota



**Notice of Intent**

To Obtain Coverage

**GENERAL PERMIT  
AUTHORIZATION TO DISCHARGE STORMWATER  
ASSOCIATED WITH MUNICIPAL SEPARATE STORM SEWER SYSTEMS  
UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION  
SYSTEM/STATE DISPOSAL SYSTEM PERMIT PROGRAM**

Permit No. MN R 040000

**REVISED AUGUST 8, 2007**  
February 1, 2007



February 1, 2007

RE: Baxter, Minnesota  
Notice of Intent to Obtain Coverage  
NPDES/SDS Storm Water Phase II  
Permit MN R 040000  
SEH No. A-BAXTE0701.00

Storm Water Management Unit  
Storm Water Section  
Municipal Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, MN 55155-4194

To whom it may concern:

In accordance with the National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Storm Water Phase II Permit Program administered by the Minnesota Pollution Control Agency (MPCA), the City of Baxter is hereby submitting the enclosed Notice of Intent (NOI) and Storm Water Pollution Prevention Program (SWPPP) for coverage under General Permit No. MN R 040000 (Noticed as MN R 580000).

If you have any questions regarding our NOI or SWPPP, please contact my Administrative Assistant at (218) 454-5115.

Sincerely,

Trevor Walter  
City Engineer  
City of Baxter  
13190 Memorywood Dr  
Baxter, MN 56425

Enclosure

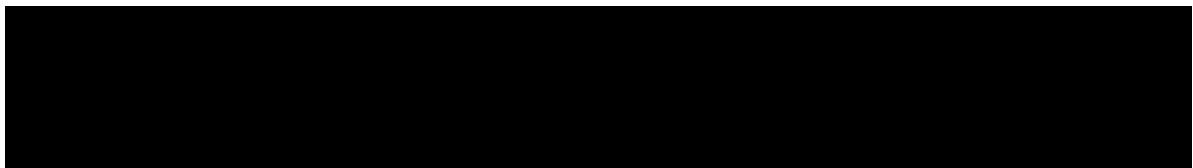
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# I. NOTICE OF INTENT



**RETURN THIS APPLICATION TO:**

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

NO FEE

Application deadline: **February 15, 2007**

**PLEASE READ: As you complete this form, read the instructions carefully. Use your keyboard's "Tab" key to move through the fields of this form. Select check-boxes and enter text as indicated. Save, and print.**

<b>A. Application Type</b>			
<input checked="" type="checkbox"/> <b>New applicant (this MS4 has no previous application for MS4 coverage on file at MPCA)</b>			
<input type="checkbox"/> <b>Application for re-issuance of coverage (this MS4 applied in 2003)</b>			
<b>B. MS4 Owner General Contact (the community, municipality, agency or other party having ownership or operation control of the MS4)</b>			
City of Baxter			
<i>Community, municipality, agency or other party having ownership or operational control of the MS4</i>			
13190 Memorywood Dr			
<i>Mailing Address</i>			
Baxter		MN	56425
<i>City</i>		<i>State</i>	<i>Zip Code</i>
Crow Wing			
<i>County</i>			
41-0851690		9150884	
<i>Federal Tax ID</i>		<i>State Tax ID</i>	
<b>C. General Contact (official, staff member, consultant or other) for all general correspondence about Permit compliance issues between the MPCA and your MS4</b>			
Walter		Trevor	Public Works Director/City Engineer
<i>Last Name</i>		<i>First Name</i>	<i>Title</i>
13190 Memorywood Dr			
<i>Mailing Address</i>			
Baxter		MN	56425
<i>City</i>		<i>State</i>	<i>Zip Code</i>
(218) 454-5115		cityhall@ci.baxter.mn.us	
<i>Telephone (include area code)</i>		<i>E-mail Address</i>	

- A. Have you developed a Storm Water Pollution Prevention Program for your MS4?  Yes  
 Municipalities must demonstrate how their Storm Water Pollution Prevention Program will be implemented and enforced over the term of the five-year Permit. SWPPPs must incorporate appropriate educational components, all required BMPs and the measurable goals associated with each. Storm Water Pollution Prevention Programs must address the specific requirements contained in Part V. G. of the Permit. SWPPPs must outline how the six minimum control measures will be addressed, the contact person, department in charge, timeline and measures that will be implemented to meet the schedules required by the Permit. Attach a BMP Summary Sheet to this application for *each* BMP in your SWPPP.
- B. Does your SWPPP address all of the six Minimum Control Measures as outlined in the Permit?  Yes  
 The General Permit requires that you incorporate all six of the defined Minimum Control Measures in your Stormwater Pollution Prevention Program. You are required to implement mandatory BMPs which are directly associated to each of the Six Minimum Control Measures.
- C. Have you attached the included BMP Summary Sheets, one for each of the Best Management Practices required by the Permit?  Yes  
 There are 34 required BMPs all of which require that the provided BMP Summary Sheet be filled out completely and included with your Storm Water Pollution Prevention Program. If any of these required sheets are missing, your application will not be considered complete and will be returned to you.

I have read and understand Part VI *Evaluating, Recordkeeping, and Reporting* of the MS4 General Permit and certify that we intend to comply with the applicable requirements of those sections as well as the Permit as a whole.  Yes

B. Where will your SWPPP be available to the public for review?

Baxter City Hall	www.ci.baxter.mn.us	
<i>Name of Location</i>	<i>If your SWPPP is available electronically, indicate location</i>	
<hr/>		
13190 Memorywood Dr		
<i>Street Address</i>		
<hr/>		
Baxter	MN	56425
<i>City</i>	<i>State</i>	<i>ZIP Code</i>
<hr/>		
Trevor Walter	(218) 454-5115	
<i>Contact Name</i>	<i>Contact Phone Number</i>	
<hr/>		
8:00 am – 4:00 pm, M-F		
<i>Hours of Availability</i>		

- A. Part II Limitations on Coverage and Appendix C  Yes  
**I have read and understand Part II Coverage Under This Permit and Appendix C Limitations on Coverage of the MS4 General Permit and certify that we intend to comply with the applicable requirements of those sections as well as the Permit as a whole.**
- B. Outstanding Resource Value Waters (ORVWs)  Yes  No  
**Please refer to the *Guidance Manual for Small Municipal Separate Storm Sewer Systems (MS4s)* to complete this section. An interactive map is available on the MPCA Web site that identifies Special Waters: <http://www.pca.state.mn.us/water/stormwater/stormwater-c.html#specialwaters>**

**1. Prohibited Waters**

Does the MS4 discharge into **Prohibited Waters** as defined in Minn. R. 7050.0180, subp. 3, 4, and 5? See Attachment Four of the *Guidance Manual for Small Municipal Separate Storm Sewer Systems (MS4s)* for further information.  Yes  No

**2. Restricted Discharge**

Does the MS4 discharge into waters with a **Restricted Discharge** as defined in Minn. R. 7050.0180, subp. 6, 6a, and 6b? If yes, please list below and comply with Part IX, Appendix C, Item B. See Attachment Four of the *Guidance Manual for Small Municipal Separate Storm Sewer Systems (MS4s)* for further information.  Yes  No

**3. Prohibited or Restricted Waters**

If you answered “yes” to either Question 1 or 2, have you included a map that outlines, at a minimum, the DNR minor sub-watersheds in your jurisdiction with ANY discharges to Prohibited or Restricted Waters? You are required by the Permit to provide this map along with your application. [IX.B.2.b]  Yes  No

**Identify all discharges to Outstanding Resource Value Waters (ORVWs) from your MS4:**

Name of Water Body	Type (lake, stream, river)
Mississippi River	River
NOTE: The City has NO direct discharges to the Mississippi River and the City has aggressive infiltration requirements for all new construction. The City has adopted the suggested storm water standards within 300 feet of the Mississippi River as recommended by the Mississippi River Headwaters Board (1996). The City also follows the DNR Shore Land Impact Zone recommendation (1000 feet) as suggested by the DNR.	

**4. If you answered “yes” to either Question 1 or 2, who is the person responsible for ensuring compliance with this Permit condition?**

Name: Trevor Walter Position: City Engineer Phone: (218) 454-5115

**C. Special Waters**

**1. Trout Waters**

Does the MS4 discharge into **Trout Waters** as defined in Minn. R. 6264.0050 subp. 2 & 4? If yes, please list below and comply with Part IX, Appendix C, Item C. See Attachments Two and Three of the *Guidance Manual for Small Municipal Separate Storm Sewer Systems (MS4s)* for further information.  Yes  No

**2. Wetlands**

Does the MS4 discharge into **Wetlands** as defined in Minn. R. 7050.0130, subp. F?  Yes  No

**3. Environmental Review**

Does the MS4 have a process to assure coordination with appropriate Agencies and to evaluate discharges that require applicable **Environmental Review** as required by State or federal laws? See Part IX of the *Guidance Manual for Small Municipal Separate Storm Sewer Systems (MS4s)* for further information.  Yes  No

**Who is the person responsible for ensuring compliance with this Permit condition?**

Name: Trevor Walter Position: City Engineer Phone: (218) 454-5115



**4. Endangered or Threatened Species**

Does the MS4 have a process to assure coordination with appropriate Agencies and to evaluate discharges whose direct, indirect, interrelated, interconnected, or independent impacts may jeopardize a listed **Endangered or Threatened Species** or adversely modify a designated critical habitat? See Part IX of the *Guidance Manual for Small Municipal Separate Storm Sewer Systems (MS4s)* for further information.

Yes  No

**Who is the person responsible for ensuring compliance with this Permit condition?**

Name: Trevor Walter Position: City Engineer Phone: (218) 454-5115

**5. Historic Places and Archeological Sites**

Does the MS4 have a process to assure coordination with appropriate Agencies and to evaluate discharges which may adversely affect properties listed or eligible for listing in the National Register of **Historic Places** or affecting known or discovered **archeological sites**? See Part IX of the *Guidance Manual for Small Municipal Separate Storm Sewer Systems (MS4s)* for further information.

Yes  No

**Who is the person responsible for ensuring compliance with this Permit condition?**

Name: Trevor Walter Position: City Engineer Phone: (218) 454-5115

**6. Drinking Water Sources**

Does the MS4 have any discharges that may affect Source Water Protection as defined in part **IX.H** of the General Permit?

Yes  No

If “yes,” does the MS4 have BMPs incorporated into the SWPPP to protect drinking water sources that the MS4 discharge may affect?

Yes  No

The person with overall, MS4 legal responsibility must sign the application. This person shall be duly authorized to sign the application and may be either a principal executive officer or ranking elected official. (See Minn. R. 7001.0060).

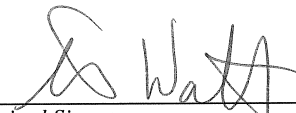
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete (Minn. R. 7001.0070).

I also certify under penalty of law that I have read, understood, and accepted all terms and conditions of the National Pollutant Discharge Elimination System (NPDES) General Storm Water Permit for MS4s that authorizes storm water discharges identified in this application form.

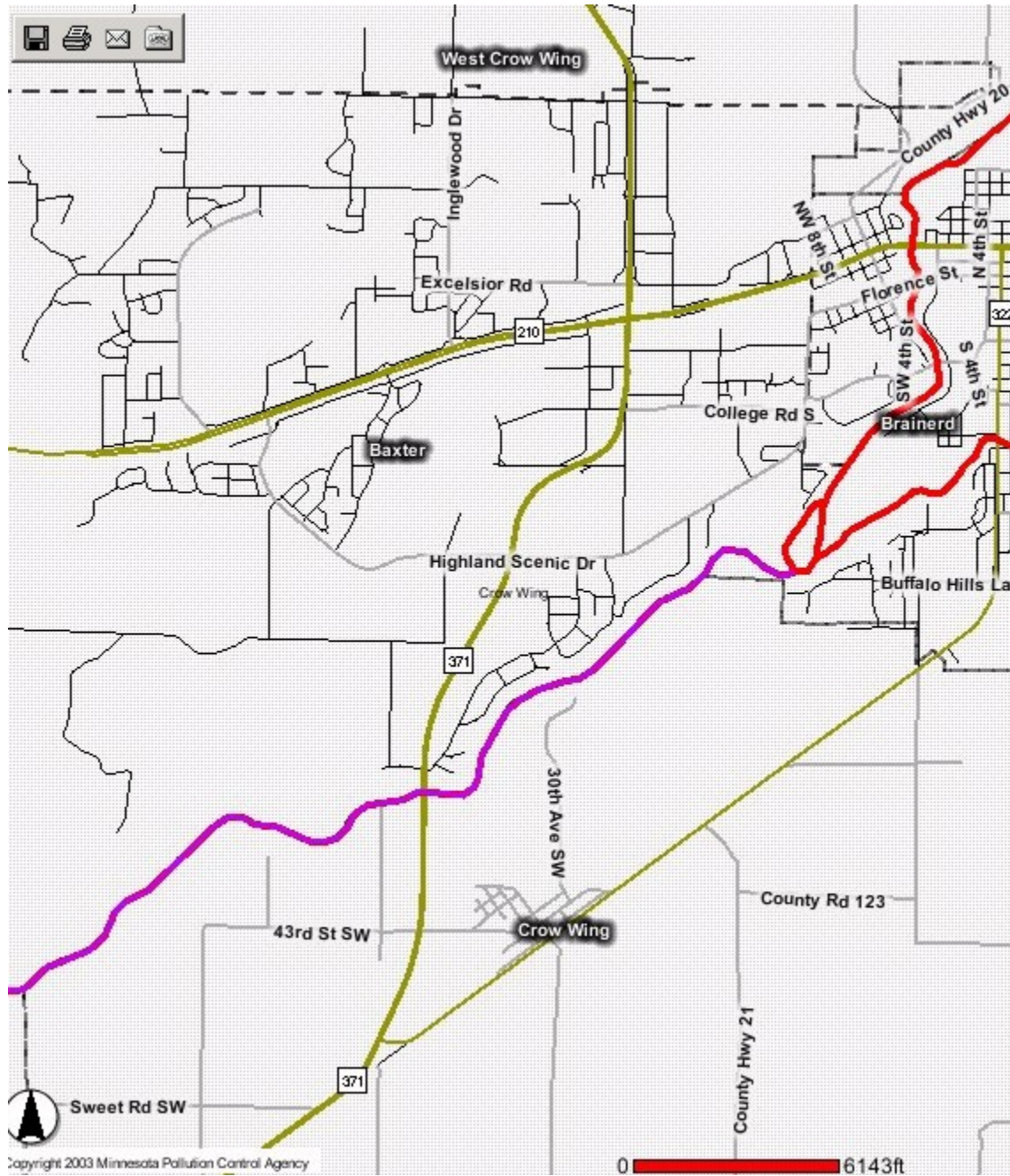
I understand that as a Permittee, I am legally accountable under the Clean Water Act to ensure compliance with the terms and conditions of the NPDES General Storm Water Permit for MS4s.

I also understand that MPCA enforcement actions (pursuant to Minn. Stat. §115.07, 116.072, and Section 309 of the Clean Water Act) may be taken against me or the MS4 if the terms and conditions of the NPDES General Storm Water Permit for MS4s are not met.

**C. General Contact (official, staff member, consultant or other) for all general correspondence about Permit compliance issues between the MPCA and your MS4**

<b>X</b>			
<i>Authorized Signature</i>		<i>Date</i>	
		9/18/07	
Walter	Trevor	City Engineer	
<i>Last Name</i>	<i>First Name</i>	<i>Title</i>	
13190 Memorywood Dr			
<i>Mailing Address</i>			
Baxter	MN	56425	
<i>City</i>	<i>State</i>	<i>ZIP Code</i>	
(218) 454-5115	cityhall@ci.baxter.mn.us		
<i>Telephone (include area code)</i>	<i>E-mail Address</i>		

From: MPCA Special and Impaired Waters Search Map





## **II. SUMMARY OF SWPPP**



## **SUMMARY OF SWPPP**

### **Background**

The City of Baxter is located in Crow Wing County. The City of Baxter is home to approximately 7800 residents.

Following is a summary of the self assessment process the City completed to prepare this Notice of Intent (NOI) for coverage under the NPDES MS4 Phase II Permit, the receiving waters within the city, the city's existing stormwater management plan and a listing of the Best Management Practices (BMPs) incorporated into the Storm Water Pollution Prevention Program (SWPPP).

The City does not have a Minnesota Department of Health approved Wellhead Protection Plan but plans to have it completed by the end of 2007.

### **Self Assessment Process**

Throughout the process of selection and development of BMPs that establish the basis for the SWPPP, the City has considered the significant sources of pollution, the potentially polluting activities being conducted in the watershed and the sensitivity of the receiving waters. The City has also considered the physical and organizational characteristics of the watersheds within the city. The ultimate goal of the City's SWPPP is to control or reduce the discharge of pollutants in stormwater runoff.

### **Receiving Waters**

The surface water features in the city include Mississippi river, several natural and man-made wetlands and a system of natural ditches. It should be noted that the majority of the south side of Baxter relies on infiltration to manage its stormwater. On the more developed north side, the City has required new commercial construction to construct stormwater management ponds with an emphasis on infiltration for up to the 100-year event. Generally, it has been the practice of the City to rely on infiltration (not transportation) of rain events up to the 100-year event.

**NOTE: The City has NO direct discharges to the Mississippi River.**

**Receiving Waters**

<b>Whipple Lake</b>	<b>Red Sand Lake</b>	<b>White Sand Lake</b>	<b>Baxter Lake</b>
<b>Moburg Lake</b>	<b>Mile Lake</b>	<b>Bass Lake</b>	<b>Hardy Lake</b>
<b>Island Lake (Kinney Rice Beds)</b>	<b>Island Lake</b>	<b>Rush Lake</b>	<b>Perch Lake</b>

Note: Due to infiltration practices such as swales, the City has no direct discharges to most of the above lakes.

**Existing Storm Water Management Program**

The City’s organizational structure relating to stormwater management decisions and efforts includes the city residents, City Council, City Engineer, Public Works Director, and several key staff. City staff involved in stormwater program implementation activities report to the City Engineer/Director of Public Works and the City Building Official.

**Process for Evaluating, Recordkeeping and Reporting**

The City will comply with the requirements of Part VI of the NPDES MS4 permit and has identified the items to be tracked and recorded in the BMP Summary Sheets included with this submittal. Records are maintained by the individuals responsible for each BMP and are compiled during the annual reporting process. The City will continue to:

- A. Evaluate program compliance and progress towards achieving its goals on an ongoing basis and summarize these findings in the annual report.
- B. Keep records for at least three years beyond the term of the permit.
- C. Make program-related records available to the public during regular business hours and upon adequate advance notice of the desire to review the program records.
- D. Submit an annual report by June 30 of each year.

**Restricted Discharge Waters (Part IX, Appendix C):**

The City has NO direct discharge to the Mississippi River. The section of the City that is immediately adjacent to the river is very rural residential with an imperviousness surface of less than 20%. In addition, these surfaces are detached imperviousness and discharge to infiltration areas with largely hydrologic Group “A” soils.

As previously stated, on the more developed north side, the City has required new commercial construction to construct stormwater management ponds with an emphasis on infiltration for up to the 100-year event. Generally, it has been the practice of the City to rely on infiltration (not transportation) of rain events up to the 100-year event.

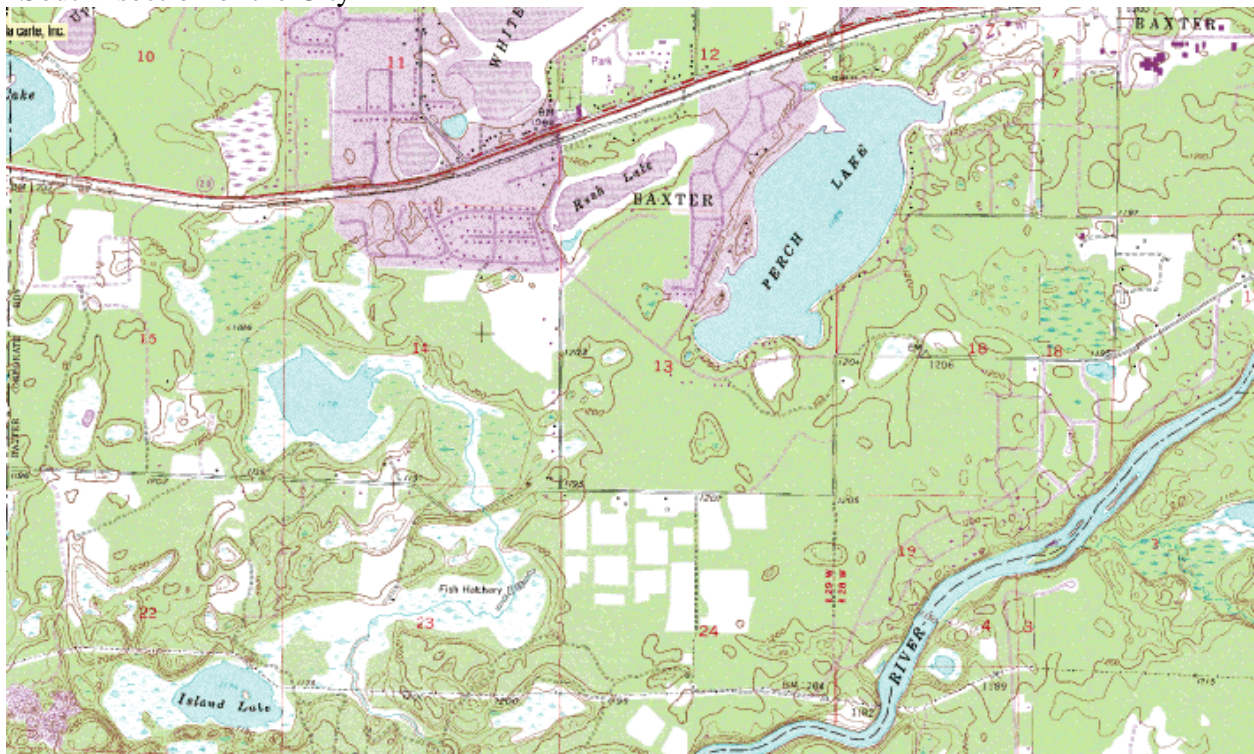
The City currently follows a Water Resources Management Plan (WSN, 1994) to address water resources related issues within the City. In addition, the City follows the requirements of the Upper Mississippi River Watershed District and the Crow Wing County Soil and Water Conservation District, which has jurisdiction throughout Baxter.

The City has also adopted the suggested storm water standards within 300 feet of the Mississippi River that were recommended by the Mississippi Rivers Headwaters Board (1996). The City also follows the DNR 1000 foot Shore Land Impact Zone recommendations.

“North” section of the City



“South” section of the City





## **III. SWPPP BMP SUMMARY SHEETS**





## Minimum Control Measure 1: PUBLIC EDUCATION AND OUTREACH

Key to Unique BMP ID Numbers	Required BMP Title	Permit Reference
1a-1	Distribute Educational Materials	<b>V.G.1.a</b>
1b-1	Implement an Education Program	<b>V.G.1.b</b>
1c-1	Education Program: Public Education and Outreach	<b>V.G.1.c</b>
1c-2	Education Program: Public Participation	<b>V.G.1.c</b>
1c-3	Education Program: Illicit Discharge Detection and Elimination	<b>V.G.1.c</b>
1c-4	Education Program: Construction Site Run-off Control	<b>V.G.1.c</b>
1c-5	Education Program: Post-Construction Stormwater Management in New Development and Redevelopment	<b>V.G.1.c</b>
1c-6	Education Program: Pollution Prevention/Good Housekeeping for Municipal Operations	<b>V.G.1.c</b>
1d-1	Coordination of Education Program	<b>V.G.1.d</b>
1e-1	Annual Public Meeting	<b>V.G.1.e</b>
1f-1	Stormwater Utility Fund	<b>NA</b>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 1-PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1a-1

<b>BMP Title:</b> Distribute Educational Materials
<b>BMP Description:</b> <p>The City will publish a series of articles in the Baxter newsletter that is mailed to city residents and made available at city offices. The City will also continue to produce and maintain a website that will communicate water resource activities and projects at <a href="http://www.ci.baxter.mn.us">http://www.ci.baxter.mn.us</a></p> <p>The City will obtain and/or develop a series of informational handouts that will be made available at city facilities. These handouts (flyers) will also be distributed at times in direct mailings to reach businesses and residents regarding general storm water issues.</p> <p>The City will work with the Mississippi Headwaters Board to develop the education and public awareness materials.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Maintain city web page for water resources information.</li><li>2. Update education materials, as needed, and make available at city hall.</li><li>3. Publish articles for each MCM (or combined article) in Baxter newsletter.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b> <p>Audience or audiences: All city residents; community groups and visitors to Baxter facilities. Increased awareness: The flyers will educate the target audiences by giving them a good understanding of a variety of water quality topics and how citizens can make a difference.</p>
<b>Responsible Party for this BMP:</b> <p>Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: <a href="mailto:cityhall@ci.baxter.mn.us">cityhall@ci.baxter.mn.us</a></p>

### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1b-1

<b>BMP Title:</b> Implement an Education Program
<b>BMP Description:</b> The City's education program consists of a wide range of activities as described in the BMP summary sheets in MCM 1 and 2, including newspaper articles, mailings, public meetings, resident participation programs and web-based information access.  The City will work with the Mississippi Headwaters Board to develop the education and public awareness materials.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Distribute stormwater-related literature to developers and contractors.</li><li>2. Distribute literature to neighborhood groups, churches, schools, city staff and business owners.</li><li>3. Maintain a list of available information.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1c-1

<b>BMP Title:</b> Education Program: Public Education and Outreach
<b>Audience(s) Involved:</b> All city residents, business owners, City Council and committees, developers, contractors, watershed organizations and others.
<b>Educational Goals for Each Audience:</b> Increased awareness: BMPs have been selected to increase awareness by making positive impressions on individuals that will help to change attitudes and behaviors towards storm water issues. The desired end result is improvements in the water quality of city lakes and water resources.
<b>Activities Used to Reach Educational Goals:</b> <ol style="list-style-type: none"><li>1. Distribution of educational and informational flyers.</li><li>2. Maintain web site postings of stormwater program information – including the city’s Surface Water Management Plan as it is updated.</li><li>3. Post opportunities for public participation on the water resources web page.</li></ol>
<b>Activity Implementation Plan:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li></ol>
<b>Performance Measures:</b> <ol style="list-style-type: none"><li>1. Quantity of flyers distributed.</li><li>2. Web site: stormwater management pages.</li><li>3. Participation levels for public events.</li></ol>
<b>Responsible Party for this BMP:</b> <p style="margin-left: 20px;">Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us</p>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1c-2

<b>BMP Title:</b> Education Program: Public Participation
<b>Audience(s) Involved:</b> Residents, developers, businesses, volunteers, youth groups, local clubs, visitors to the city.
<b>Educational Goals for Each Audience:</b> Increased awareness: The program will make known the importance of stormwater issues and how people can make an impact on a larger scale. Activities may include storm drain stenciling, picking up trash near the stenciled storm drains and by noting where maintenance is needed.
<b>Activities Used to Reach Educational Goals:</b> <ol style="list-style-type: none"><li>1. Annual Town Hall Meeting</li><li>2. Kiwanis Clean Up Day</li><li>3. Sentenced to Serve Clean Ups (STS)</li><li>4. Leaf Drop Site (spring and fall)</li><li>5. Oil and Antifreeze recycling site (at the City Shop)</li></ol>
<b>Activity Implementation Plan:</b> <ol style="list-style-type: none"><li>1. Annually.</li><li>2. Annually.</li><li>3. Ongoing</li><li>4. Ongoing</li><li>5. Ongoing</li></ol>
<b>Performance Measures:</b> <ol style="list-style-type: none"><li>1. Staff and financial participation for the events held.</li><li>2. Number of participants</li></ol> <p>Note: Not all events may be held each year.</p>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1c-3

<b>BMP Title:</b> Education Program: Illicit Discharge Detection and Elimination
<b>Audience(s) Involved:</b> Residents, developers, businesses, volunteers, visitors to the city, city staff.
<b>Educational Goals for Each Audience:</b> The program will make known the importance of stormwater issues and how people can make an impact on a larger scale. The City will publish a phone number as one method residents can use to notify the City of potential illicit discharges. These means of contact are featured in several of the articles posted on the city's dedicated stormwater page. The various articles solicit stormwater related questions and citizen input on the city's SWPPP, and encourages residents to report illicit discharges or other stormwater related problems. Any calls will be entered into the city's Call Log and then the Work Order System/Complaint form and distributed to the appropriate staff. All Work Orders/Complaint forms are scanned into the computer system and stored.
<b>Activities Used to Reach Educational Goals:</b> <ol style="list-style-type: none"><li>1. Maintain a city phone number to collect notices of potential illicit discharges.</li><li>2. Post at least one article on the city website relating to Minimum Control Measure #3.</li><li>3. Publish at least 1 article in the Baxter newsletter relating to MCM #3.</li></ol>
<b>Activity Implementation Plan:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Annually</li><li>3. Annually</li></ol>
<b>Performance Measures:</b> <ol style="list-style-type: none"><li>1. Number of calls to City Hall relating to potential illicit discharges.</li><li>2. Article posted.</li><li>3. Article published.</li></ol>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1c-4

<b>BMP Title:</b> Education Program: Construction Site Run-off Control
<b>Audience(s) Involved:</b> Residents, developers, businesses, volunteers, visitors to the city.
<b>Educational Goals for Each Audience:</b> The program will make known the importance of stormwater issues and how people can make an impact on a larger scale. An article on erosion control has been posted on the city's website and can be accessed via links on the city's dedicated stormwater page. Information on erosion control is distributed with all grading permits and building permits. New projects are reviewed for erosion control plan.  The City will be working with the Mississippi Headwaters Board for educational materials.
<b>Activities Used to Reach Educational Goals:</b> 1. Post at least one article on the city website relating to Minimum Control Measure #4. 2. Publish at least 1 article in the Baxter Bulletin relating to MCM #4. 3. Distribute and make available standards guidance information to developers as initial contacts are made (materials may include MnDOT guide manual, MPCA guidance, watershed guidance, City Standard Details, etc.).
<b>Activity Implementation Plan:</b> 1. Annually 2. Annually 3. Ongoing/Annually
<b>Performance Measures:</b> 1. Article posted. 2. Article published 3. Number of developers sent erosion control guidance materials.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1c-5

<b>BMP Title:</b> Education Program: Post-Construction Stormwater Management in New Development and Redevelopment
<b>Audience(s) Involved:</b> Residents, developers, businesses, volunteers, visitors to the City.
<b>Educational Goals for Each Audience:</b> The program will make known the importance of stormwater issues and how people can make an impact on a larger scale. The City will continue to maintain and update flyers and the city website.
<b>Activities Used to Reach Educational Goals:</b> 1. Post at least one article on the city website relating to Minimum Control Measure #5. 2. Publish at least 1 article in the Baxter Bulletin relating to MCM #5. 3. Distribute and make available treatment system standards and guidance documents to developers as initial contacts are made
<b>Activity Implementation Plan:</b> 1. Annually 2. Annually 3. Ongoing/Annually
<b>Performance Measures:</b> 1. Article posted. 2. Article published. 3. Number of developers sent water quality BMP guidance materials.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



**BMP Summary Sheet**

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1c-6

<b>BMP Title:</b> Education Program: Pollution Prevention/Good Housekeeping for Municipal Operations
<b>Audience(s) Involved:</b> Residents, developers, businesses, volunteers, visitors to the city, city staff.
<b>Educational Goals for Each Audience:</b> The program will make known the importance of stormwater issues and how people and city staff can make an impact on a larger scale. This information will also let residents know what the City is doing on a regular basis to actively improve water quality throughout the city.
<b>Activities Used to Reach Educational Goals:</b> 1. Post at least one article on the city website relating to Minimum Control Measure #6. 2. Publish at least 1 article in the Baxter Bulletin relating to MCM #6. 3. Conduct annual internal staff training event on municipal operations and make information available to staff.
<b>Activity Implementation Plan:</b> 1. Annually 2. Annually 3. Annually
<b>Performance Measures:</b> 1. Article posted. 2. Article published. 3. Number of staff trained, topics/water resource material covered.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1d-1

<b>BMP Title:</b> Coordination of Education Program
<b>BMP Description:</b> The City will work with the County and the Mississippi Headwaters Board to distribute general information on non-point source pollution, water resource impacts and needs for and benefits of reduction. The City also currently has efforts ongoing with these agencies to promote and install a range of stormwater practices in suitable areas. The most efficient method of coordinating these programs is by maintaining links to related programs on the various website.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Maintain a link to county web pages for water resources information.</li><li>2. Provide web link/access to material available from MPCA.</li><li>3. Provide web link/access to material available from local Watershed Districts.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Annually (check access and update, as needed.)</li><li>2. Annually (check access and update, as needed.)</li><li>3. Annually (check access and update, as needed.)</li></ol>
<b>Specific Components and Notes:</b> The City will work with Upper Mississippi River Watershed District.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1e-1

<b>BMP Title:</b> Annual Public Meeting
<b>BMP Description:</b> The City will hold an annual public meeting about stormwater and water quality issues before June of each year. An annual report will be sent to the MPCA by June 30 for each year of the permit term.
<b>Measurable Goals:</b> 1. Place NPDES Phase II program on the agenda of the City Council in advance of the annual report, or hold a special meeting to review year's progress and to solicit input from interested citizens. 2. Meeting notice published in advance, per state law.
<b>Timeline/Implementation Schedule:</b> Annually
<b>Specific Components and Notes:</b> To encourage citizen participation and discussion on water quality issues. NPDES and state programs require annual stakeholder meetings and public notice.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218) 454-5115 E-mail: cityhall@ci.baxter.mn.us

**BMP Summary Sheet**

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** PUBLIC EDUCATION AND OUTREACH

**Unique BMP Identification Number:** 1f-1

<b>BMP Title:</b> Stormwater Utility Fund
<b>BMP Description:</b> The City has a Stormwater Utility Fund that is used to help fund stormwater related projects and maintenance activities. While not a required BMP under the NPDES MS4 permit, the City will maintain this practice.
<b>Measurable Goals:</b> 1. Review rate structure annually (in accordance with annual financial audit process). 2. Make changes to rates as needed to support program needs.
<b>Timeline/Implementation Schedule:</b> 1. Annually 2. As needed.
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



## Minimum Control Measure 2: PUBLIC PARTICIPATION/INVOLVEMENT

Key to Unique BMP ID Numbers	Required BMP Title	Permit Reference
2a-1	Comply with Public Notice Requirements	<b>V.G.2.a</b>
2b-1	Solicit Public Input and opinion on the Adequacy of the SWPPP	<b>V.G.2.b</b>
2c-1	Consider Public Input	<b>V.G.2.c</b>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 2-PUBLIC PARTICIPATION/INVOLVEMENT

**Unique BMP Identification Number:** 2a-1

<b>BMP Title:</b> Comply with Public Notice Requirements
<b>BMP Description:</b> <p>The City will provide at least 30 days notice to residents through the local newspaper relating to the date, time and details of the annual public meeting. The meeting will be held before June of each year to present progress to date on the city's SWPPP for the past year and required activities for the following year. The City will follow applicable public notice requirements and solicit public opinion about the adequacy of the SWPPP. The City will consider both written and oral public comments. Baxter will also broadcast the annual informational meeting on community cable programming if possible.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Prepare and notice the public meeting in the official local paper.</li><li>2. Specify format and timing of meeting to ensure full and fair consideration of all views.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Notice at least 30 days prior to the scheduled meeting.</li><li>2. Annually with notice posted at least 30 days prior to meeting.</li></ol>
<b>Specific Components and Notes:</b> <p>See also BMP 1e-1, 2b-1, 2c-1</p>
<b>Responsible Party for this BMP:</b> <p>Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: <a href="mailto:cityhall@ci.baxter.mn.us">cityhall@ci.baxter.mn.us</a></p>

### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 2-PUBLIC PARTICIPATION/INVOLVEMENT

**Unique BMP Identification Number:** 2b-1

<p><b>BMP Title:</b> Solicit Public Input and opinion on the Adequacy of the SWPPP</p>
<p><b>BMP Description:</b></p> <p>The City will hold an annual public meeting at a Council meeting before June of each year to present progress to date on the city's SWPPP for the past year and required activities for the following year. The City will follow applicable public notice requirements and solicit public opinion about the adequacy of the SWPPP. The City will consider both written and oral public comments. Baxter will also broadcast the annual informational meeting on community cable programming if possible.</p>
<p><b>Measurable Goals:</b></p> <ol style="list-style-type: none"><li>1. Provide an opportunity for public input in written or oral format.</li><li>2. Have draft annual report available at public meeting.</li></ol>
<p><b>Timeline/Implementation Schedule:</b></p> <ol style="list-style-type: none"><li>1. Annually, prior to the meeting, at the meeting or by data specified in the notice.</li><li>2. Annually</li></ol>
<p><b>Specific Components and Notes:</b></p>
<p><b>Responsible Party for this BMP:</b></p> <p>Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us</p>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 2-PUBLIC PARTICIPATION/INVOLVEMENT

**Unique BMP Identification Number:** 2c-1

<b>BMP Title:</b> Consider Public Input
<b>BMP Description:</b> The City will hold an annual public meeting at a Council meeting before June of each year to present progress to date on the city's SWPPP for the past year and required activities for the following year. The City will follow applicable public notice requirements and solicit public opinion about the adequacy of the SWPPP. The City will consider both written and oral public comments. Baxter will also broadcast the annual informational meeting on community cable programming.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Summarize comments and analyze needs for adjustments to the SWPPP where appropriate.</li><li>2. Incorporate any significant changes identified by the input into the annual report and SWPPP revisions.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Annually (prior to June 30)</li><li>2. Annually.</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us





## Minimum Control Measure 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

<b>Key to Unique BMP ID Numbers</b>	<b>Required BMP Title</b>	<b>Permit Reference</b>
3a-1	Storm Sewer System Map	<b>V.G.3.a</b>
3b-1	Regulatory Control Program	<b>V.G.3.b</b>
3c-1	Illicit Discharge Detection and Elimination Plan	<b>V.G.3.c</b>
3d-1	Public and Employee Illicit Discharge Information Program	<b>V.G.3.d</b>
3e-1	Identification of Non Stormwater Discharges and Flows	<b>V.G.3.e</b>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 3-ILLCIT DISCHARGE DETECTION AND  
ELIMINATION

**Unique BMP Identification Number:** 3a-1

<b>BMP Title:</b> Storm Sewer System Map
<b>BMP Description:</b> <p>The City will prepare a map that shows the location of portions of the city storm sewer system, treatment facility components and receiving water bodies. The map currently helps facilitate management of the overall illicit discharge detection and elimination program and the BMP maintenance program. An electronic (GIS/CAD based) storm system infrastructure map of the MS4 will be completed in subsequent permit years to help coordinate management activities to remove illicit connections and track storm system inspections and maintenance. The map will identify: 1) ponds, streams, lakes and wetlands that are part of the city's storm system; 2) structural pollution control devices (grit chambers, separators, etc.); 3) all pipes and conveyances as a goal, but at a minimum, those pipes that are 24 inches in diameter and over; and 4) Outfalls to receiving waters and other MS4s, structures that discharge directly to groundwater, overland discharge points and all other points that are outlets, but not diffuse flow areas.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Compile existing data relating to items 1-4 above.</li><li>2. Create draft GIS/CAD based map.</li><li>3. Complete the MS4 map.</li><li>4. Incorporate new BMPs and storm system created by new and redevelopment projects upon map completion.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. June 30, 2007.</li><li>2. December 31, 2007.</li><li>3. June 30, 2008.</li><li>4. Annually</li></ol>
<b>Specific Components and Notes:</b> <p>This component is already largely completed.</p>
<b>Responsible Party for this BMP:</b> <p>Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us</p>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 3-ILLICIT DISCHARGE DETECTION AND  
ELIMINATION

**Unique BMP Identification Number:** 3b-1

<b>BMP Title:</b> Regulatory Control Program
<b>BMP Description:</b> The City will develop an ordinance to control non-stormwater discharges into the storm sewer system  The City will also continue to participate in the County Hazardous Waste and Recycling Program which collects: adhesives, aerosol spray products, automotive products, fluorescent lamps, furniture refinishing products, household cleaners, paint, stain, pool chemicals, pesticides, herbicides, insecticides, oil, oil filters, and antifreeze
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Review ordinances to determine if adequately meeting the illicit discharge requirements.</li><li>2. Initiate formal update to address illicit discharges in city code.</li><li>3. Complete updates to illicit discharge ordinance.</li><li>4. Complete updates, as needed, through formal ordinance review and modification process.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. December 31, 2007.</li><li>2. June 1, 2008.</li><li>3. June 30, 2010.</li><li>4. Annually (as needed).</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 3-ILLCIT DISCHARGE DETECTION AND ELIMINATION

**Unique BMP Identification Number:** 3c-1

<b>BMP Title:</b> Illicit Discharge Detection and Elimination Plan
<b>BMP Description:</b> <p>The City has explored opportunities to expand existing inspection programs to address illicit connections and illegal dumping detection and elimination. The City has coordinated current activities with the complaint response program and related inspection and monitoring activities. This will be one of the methods by which the City monitors for illicit discharges into and from their system.</p> <p>A range of potentially polluting activities occurs throughout the city (e.g., construction projects, hazardous materials handling, used oil and pesticide disposal, etc.) that can be identified and better addressed through this program. The storm system outfalls in the City inspecting these outfalls will be one step in tracking down illicit discharges or other potential water quality hazards that may impact the MS4 system.</p> <p>The City recently completed smoke testing on the entire sanitary system and plans to repeat this testing every 5 years.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Respond to complaints or information relating to potential illicit discharges and illegal dumping.</li><li>2. Implement inspection program of the city storm system and development projects.</li><li>3. Evaluate annual monitoring data (if available) that may be available from the local watershed districts.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Ongoing/Annually</li><li>3. Annually</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> <p>Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us</p>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 3-ILLICIT DISCHARGE DETECTION AND  
ELIMINATION

**Unique BMP Identification Number:** 3d-1

<b>BMP Title:</b> Public and Employee Illicit Discharge Information Program
<b>BMP Description:</b> <p>Representatives from city staff participate in the public works meeting. The group currently meets on Monday mornings to discuss storm water related issues, one of which is the need for training for city personnel and issues relating to illicit discharges. Staff from Public Works and Engineering Departments attends the PWF training sessions.</p> <p>Internal spill prevention and control training is held annually. Illicit discharge and response is also covered in the internal training session. Note: The City has all vehicle maintenance done at local vendors.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Distribute information on illicit discharges in conjunction with BMP 1c-2.</li><li>2. Conduct annual staff training in conjunction with BMP 6a-1.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Annually</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 3-ILLICIT DISCHARGE DETECTION AND ELIMINATION

**Unique BMP Identification Number:** 3e-1

<b>BMP Title:</b> Identification of Non Stormwater Discharges and Flows		
<b>BMP Description:</b>		
<p>The City has reviewed the following categories of <b>non-stormwater discharges or flows</b> (i.e., illicit discharges) and has determined that none identified in the list are known to be significant contributors of pollutants to our system at this time.</p>		
<b>Category</b>	<b>Significant Contributor?</b>	
	<b>Yes</b>	<b>No</b>
Water line flushing		√
Landscape irrigation		√
Diverted stream flows		√
Rising ground waters		√
Uncontaminated ground water		√
Uncontaminated pumped ground water		√
Discharges from potable water sources		√
Foundation drains		√
Air conditioning condensation		√
Irrigation water		√
Springs		√
Water from crawl space pumps		√
Footing drains		√
Lawn watering		√
Individual residential car washing		√
Flows from riparian habitats and wetlands		√
Dechlorinated swimming pool discharges		√
And street wash water		√
Discharges or flows from fire fighting activities		√
<b>Measurable Goals:</b>		
1. Review non-stormwater discharge list annually to evaluate significance of each potential source.		
<b>Timeline/Implementation Schedule:</b>		
1. Annually		
<b>Specific Components and Notes:</b>		
<p>All hotel swimming pools are required by ordinance to discharge to the sanitary sewer and they are inspected by the Building Inspector. The City has an Ordinance and Building Codes that prohibits foundation drains from discharging to the stormwater system. The City has a policy to have all properties hooked up to the City Sanitation System by 2011.</p>		
<b>Responsible Party for this BMP:</b>		
Name: Trevor Walter		
Department: City Engineer		
Phone: (218)454-5115		
E-mail: cityhall@ci.baxter.mn.us		



## Minimum Control Measure 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Key to Unique BMP ID Numbers	Required BMP Title	Permit Reference
4a-1	Ordinance or other Regulatory Mechanism	<b>V.G.4.a</b>
4b-1	Construction Site Implementation of Erosion and Sediment Control BMPs	<b>V.G.4.b</b>
4c-1	Waste Controls for Construction Site Operators	<b>V.G.4.c</b>
4d-1	Procedure for Site Plan Review	<b>V.G.4.d</b>
4e-1	Establishment of Procedures for the Receipt and Consideration of Reports of Stormwater Noncompliance	<b>V.G.4.e</b>
4f-1	Establishment of Procedures for Site Inspections and Enforcement	<b>V.G.4.f</b>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 4-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

**Unique BMP Identification Number:** 4a-1

<b>BMP Title:</b> Ordinance or other Regulatory Mechanism
<b>BMP Description:</b> <hr/> <p>The City will develop an appropriate ordinance; this may involve some additional coordination with the Soil and Water Conservation District.</p> <p>A Stormwater and Erosion and Sediment Control (ESC) Ordinance will be completed by Aug.15, 2007</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Review erosion and sediment control ordinance sections to maintain adequate controls.</li><li>2. Complete updates, as needed, through formal ordinance review and modification process.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Aug. 15, 2007</li><li>2. Annually, as needed</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 4-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

**Unique BMP Identification Number:** 4b-1

<b>BMP Title:</b> Construction Site Implementation of Erosion and Sediment Control BMPs
<b>BMP Description:</b> The City will develop a process for Construction Site Inspections.
<b>Measurable Goals:</b> 1. Conduct plan review of proposed erosion control practices. 2. Conduct inspections of construction sites.
<b>Timeline/Implementation Schedule:</b> 1. Aug. 15, 2007 and Ongoing/Annually 2. Aug. 15, 2007 and Ongoing/Annually
<b>Specific Components and Notes:</b> The City efforts are also supplemented by local watershed efforts. The City will continue to review permit-related information (e.g., copies of permits, copies of violation notices, etc.) submitted to the City from the WD.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 4-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

**Unique BMP Identification Number:** 4c-1

<b>BMP Title:</b> Waste Controls for Construction Site Operators
<b>BMP Description:</b> <hr/> <p>The City has a current policy that addresses construction site waste controls. The policy is related to building code enforcement but also gives the City the authority to address issues relating to potential water quality hazards of construction site waste management. This may involve some additional coordination with the Soil and Water Conservation District.</p> <p>A Stormwater and Erosion and Sediment Control (ESC) Ordinance will be completed by Aug.15, 2007</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Based on inspections, record the number of non-compliant sites and record the number of sites where city clean-up is needed.</li><li>2. Review ordinance language for revisions specific to stormwater runoff control.</li><li>3. If changes are needed, make formal changes in accordance with City procedures.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually (as part of construction site inspection program)</li><li>2. Aug. 15, 2007</li><li>3. Aug. 15, 2007</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 4-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

**Unique BMP Identification Number:** 4d-1

<b>BMP Title:</b> Procedure for Site Plan Review
<b>BMP Description:</b> The City will continue to use its Site Plan Review process to closely monitor site stormwater runoff. This may involve some additional coordination with the Soil and Water Conservation District.
<b>Measurable Goals:</b> 1. Review development plans for sites for which include land disturbing activities and record the number of sites/projects reviewed annually. 2. Track the number and type of stormwater management BMPs proposed.
<b>Timeline/Implementation Schedule:</b> 1. Aug. 15, 2007 and Ongoing/Annually 2. Aug. 15, 2007 and Ongoing/Annually
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 4-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

**Unique BMP Identification Number:** 4e-1

<b>BMP Title:</b> Establishment of Procedures for the Receipt and Consideration of Reports of Stormwater Noncompliance
<b>BMP Description:</b> <hr/> <p>The City will use their existing system of responding to calls to the Public Works department on stormwater related concerns. The program phone number and process will be noticed in the City Newsletter and on the webpage. Residents of the city will be able to use the call line to report illicit discharges, report construction site erosion or sedimentation concerns and provide comments on the City's SWPPP.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Maintain dedicated stormwater call number on website.</li><li>2. Record the number of calls and the nature of the complaint/call.</li><li>3. Record the number of staff inspections resulting from the call line.</li><li>4. Record/track follow-up actions initiated from calls and complaints received.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li><li>4. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b>  
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

**BMP Summary Sheet**

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 4-CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

**Unique BMP Identification Number:** 4f-1

<b>BMP Title:</b> Establishment of Procedures for Site Inspections and Enforcement
<b>BMP Description:</b> The City will develop a process for site inspections.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Develop and approve the inspection process.</li><li>2. Record the number of sites inspected annually.</li><li>3. Record the number of non-compliant sites.</li><li>4. Record the number of sites where city clean-up is needed.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Aug. 15, 2007</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li><li>4. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b> Related to effort and program activities in BMP 4b-1.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



## Minimum Control Measure 5: POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Key to Unique BMP ID Numbers	Required BMP Title	Permit Reference
5a-1	Development and Implementation of Structural and/or Non-structural BMPs	<b>V.G.5.a</b>
5b-1	Regulatory Mechanism to Address Post Construction Runoff from New Development and Redevelopment	<b>V.G.5.b</b>
5c-1	Long-term Operation and Maintenance of BMPs	<b>V.G.5.c</b>

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 5-POST-CONSTRUCTION STORMWATER  
MANAGEMENT IN NEW DEVELOPMENT AND  
REDEVELOPMENT

**Unique BMP Identification Number:** 5a-1

<b>BMP Title:</b> Development and Implementation of Structural and/or Non-structural BMPs
<b>BMP Description:</b> The City currently has several policies, ordinances and standards that must be followed to address post construction runoff controls at sites where land disturbing activities are occurring.
<b>Measurable Goals:</b> 1. Record the number and type of structural and non-structural BMPs installed annually (e.g., NURP ponds, rain gardens, infiltration basins, sump manholes, grit chambers, bioretention areas, etc.). 2. Incorporate new facilities in BMP database and map for city-installed alternative practices and private systems.
<b>Timeline/Implementation Schedule:</b> 1. June 30, 2008 and Ongoing/Annually 2. June 30, 2008 and Ongoing/Annually
<b>Specific Components and Notes:</b> See also BMPs 3a-1 and 4b-1.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 5-POST-CONSTRUCTION STORMWATER  
MANAGEMENT IN NEW DEVELOPMENT AND  
REDEVELOPMENT

**Unique BMP Identification Number:** 5b-1

<b>BMP Title:</b> Regulatory Mechanism to Address Post Construction Runoff from New Development and Redevelopment
<b>BMP Description:</b> The City currently has several ordinances and standards that must be followed to address post construction runoff controls at sites where land disturbing activities are occurring. The City will meet with the SWCD on this issue.
<b>Measurable Goals:</b> 1. Review of development standards in the City Code. 2. Revise standards and complete formal ordinance adoption in accordance with city procedures, if needed. 3. Review of standards following changes in NPDES permit program and/or TMDL studies or other significant program changes.
<b>Timeline/Implementation Schedule:</b> 1. June 30, 2008 2. June 30, 2008 3. As needed to comply with watershed or state program changes.
<b>Specific Components and Notes:</b> The City has language in each Developer's Agreement for the maintenance of ponds that the City does not agree to take control of. The City is currently working on a Stormwater and ESC Ordinance.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 5-POST-CONSTRUCTION STORMWATER  
MANAGEMENT IN NEW DEVELOPMENT AND  
REDEVELOPMENT

**Unique BMP Identification Number:** 5c-1

<b>BMP Title:</b> Long-term Operation and Maintenance of BMPs
<b>BMP Description:</b> Baxter will continue to implement the current program to require maintenance of new stormwater ponds and other water quality BMPs within the city that are not owned or operated by the City.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Require maintenance agreements on new private BMPs during the development approval process.</li><li>2. Record/track the number of new private systems where maintenance agreements have been completed.</li><li>3. Develop and maintain private BMP maintenance agreement tracking system (e.g., by parcel, BMP, project type, etc.).</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



## Minimum Control Measure 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING

Key to Unique BMP ID Numbers	Required BMP Title	Permit Reference
6a-1	Municipal Operations and Maintenance Program	V.G.6.a
6a-2	Street Sweeping	
6b-2	Annual Inspection of All Structural Pollution Control Devices	V.G.6.b.2
6b-3	Inspection of a Minimum of 20 percent of the MS4 Outfalls, Sediment Basins and Ponds Each Year on a Rotating Basis	V.G.6.b.3
6b-4	Annual Inspection of All Exposed Stockpile, Storage and Material Handling Areas	V.G.6.b.4
6b-5	Inspection Follow-up Including the Determination of whether Repair, Replacement, or Maintenance Measures are Necessary and the Implementation of the Corrective Measures	V.G.6.b.5
6b-6	Record Reporting and Retention of all Inspections and Responses to the Inspections	V.G.6.b.6
6b-7	Evaluation of Inspection Frequency	V.G.6.b.7

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6a-1

<b>BMP Title:</b> Municipal Operations and Maintenance Program
<b>BMP Description:</b> <p>Representatives from city staff participate in the Public Works Meeting (weekly mtg). The group meets to discuss stormwater related issues, one of which is the need for training for city personnel. Spill Prevention and Control training is held annually, generally in about in February of each year. Public Works personnel from street maintenance, sewers, and vehicle maintenance are required to attend.</p> <p>The goal of the internal staff training is to prevent or reduce the discharge of pollutants in to the city stormwater system and city water bodies. Training will address activities and best management practices to be followed during park and open space maintenance, fleet and building maintenance, new construction and storm system maintenance.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Conduct a staff training event at least annually to discuss the topics relating to water resources programs.</li><li>2. Record number of staff attending the annual training event and meeting and the topics covered.</li><li>3. Conduct meetings, as needed, of key stormwater team leads to discuss storm water related operational priorities and activities.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Annually</li><li>2. Annually</li><li>3. Ongoing (Annually, or greater frequency, as needed)</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6a-2

<b>BMP Title:</b> Street Sweeping
<b>BMP Description:</b> The City will continue the current street sweeping program for vehicle safety, pedestrian safety, and water quality and environmental reasons. Street sweeping will be done as weather permits (early April). The City also prioritizes sweeping to target key areas of the city.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Sweep at least once in the spring of each year (additional fall sweeping as weather and budget permits)</li><li>2. Sweep priority/targeted areas as needed throughout the year (summer and/or winter).</li><li>3. Estimate the number of miles swept annually.</li><li>4. Estimate the amount (volume or weight) of material collected.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Annually</li><li>2. Annually</li><li>3. Ongoing/Annually</li><li>4. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b> As part of the street maintenance program, the City has evaluated the snow and ice control program with an emphasis on reducing sand use and alternatives to salt.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6b-2

<b>BMP Title:</b> Annual Inspection of All Structural Pollution Control Devices
<b>BMP Description:</b> <p>The City currently operates a program of cleaning structural BMPs including catch basins, stormwater ponds and system outfalls. City staff inspects system components to look for sediment and debris buildup and proper functioning of the system and illicit discharges. The City is developing a more detailed database for the storm system that will be used to better track inspection activities and initiate maintenance work orders. The City will continue this program and look for opportunities to improve the tracking of inspection results and program efficiency. The inspection program will be coordinated with the BMP and Outfall mapping updates.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Inspect 100% of the pollution control devices such as trap manholes, grit chambers, sumps, floatable skimmers, separators and other small settling or filtering devices each year.</li><li>2. Record and track follow-up actions needed, assign a priority level and a timeline for addressing the problem.</li><li>3. Record inspection date, weather conditions and results for each component inspected.</li><li>4. Record and track the dates of completing major maintenance activities.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li><li>4. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6b-3

<b>BMP Title:</b> Inspection of a Minimum of 20 percent of the MS4 Outfalls, Sediment Basins and Ponds Each Year on a Rotating Basis
<b>BMP Description:</b> The City currently operates a program of cleaning structural BMPs including catch basins, stormwater ponds and system outfalls. City staff inspects system components to look for sediment and debris buildup and proper functioning of the system and illicit discharges. The City is developing a more detailed database for the storm system that will be used to better track inspection activities and initiate maintenance work orders. The City will continue this program and look for opportunities to improve the tracking of inspection results and program efficiency. The inspection program will be coordinated with the BMP and Outfall mapping updates.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Inspect at least 20% of system outfalls, sediment basins and ponds each year.</li><li>2. Record and track follow-up actions needed, assign a priority level and a timeline for addressing the problem.</li><li>3. Record inspection date, weather conditions and results for each component inspected.</li><li>4. Record and track the dates of completing major maintenance activities.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li><li>4. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6b-4

<b>BMP Title:</b> Annual Inspection of All Exposed Stockpile, Storage and Material Handling Areas
<b>BMP Description:</b> The City currently operates material stockpiles and handling areas at several locations within the City. The City inspects these areas at least annually and conducts maintenance as needed as part of the overall storm system maintenance program. The City will continue this program and look for opportunities to improve the tracking of inspection results and program efficiency. The inspection program will be coordinated with the BMP and outfall mapping updates.  NOTE: All materials are in an enclosed facility.
<b>Measurable Goals:</b> 1. Inspect material stockpile and handling areas each year. 2. Record and track follow-up actions needed, assign a priority level and a timeline for addressing problems. 3. Record inspection date, weather conditions and results for each component inspected. 4. Record and track the dates of completing major maintenance activities.
<b>Timeline/Implementation Schedule:</b> 1. Annually 2. Ongoing/Annually 3. Ongoing/Annually 4. Ongoing/Annually .
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6b-5

<b>BMP Title:</b> Inspection Follow-up Including the Determination of whether Repair, Replacement, or Maintenance Measures are Necessary and the Implementation of the Corrective Measures
<b>BMP Description:</b> <p>The City will continue to update the inventory of structural runoff controls and continue current BMP maintenance and pond cleanout programs and record data in the developing database system to integrate the location of these controls with schedules for regular inspection and maintenance. The program will result in timely maintenance of the city's storm system components.</p> <p>The City has created forms that are used for creating follow-up work orders for major and minor maintenance activities.</p>
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Inspect and maintain system components according to priority system established by the City.</li><li>2. Track the number of system components maintained and the general condition of the system.</li><li>3. Track and major maintenance completed on the system.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing/Annually</li><li>2. Ongoing/Annually</li><li>3. Ongoing/Annually</li></ol>
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6b-6

<b>BMP Title:</b> Record Reporting and Retention of All Inspections and Responses to the Inspections
<b>BMP Description:</b> The City currently uses the SEH PermiTracker system to keep track of inspections and to maintain all records for the minimum required time. The City also keeps copies of the City Engineer Department work orders.
<b>Measurable Goals:</b> <ol style="list-style-type: none"><li>1. Continue to track inspection program data in current system.</li><li>2. Develop GIS-based database system to accommodate all city storm system infrastructure.</li><li>2. Maintain and update the database with system inspection records.</li></ol>
<b>Timeline/Implementation Schedule:</b> <ol style="list-style-type: none"><li>1. Ongoing</li><li>2. Develop initial database by December 2008.</li><li>3. Ongoing/Annual updates.</li></ol>
<b>Specific Components and Notes:</b> Measurable Goal 2 refers to city system only. However, as the database system develops, the City may further refine the system to include private BMPs throughout the city.
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us

### BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 6-POLLUTION PREVENTION/GOOD HOUSEKEEPING

**Unique BMP Identification Number:** 6b-7

<b>BMP Title:</b> Evaluation of Inspection Frequency
<b>BMP Description:</b> The City currently operates a program of cleaning structural BMPs including catch basins, stormwater ponds and system outfalls. City staff inspects system components to look for sediment and debris buildup and proper functioning of the system and illicit discharges. The inspection program will be coordinated with the BMP and Outfall mapping updates.
<b>Measurable Goals:</b> 1. Reevaluate inspection schedule and frequencies following annual reporting results. 2. Increase or decrease frequency if prior year conditions warranted more or less frequent cleaning or maintenance.
<b>Timeline/Implementation Schedule:</b> 1. Ongoing/Annually 2. Ongoing/Annually
<b>Specific Components and Notes:</b>
<b>Responsible Party for this BMP:</b> Name: Trevor Walter Department: City Engineer Phone: (218)454-5115 E-mail: cityhall@ci.baxter.mn.us



## Minimum Control Measure 7: SPECIAL WATERS AND SPECIAL PROTECTION AREAS

<b>Key to Unique BMP ID Numbers</b>	<b>Required BMP Title</b>	<b>Permit Reference</b>
7a-1	Restricted Discharge and Impaired Waters Review Process	V.H.: IX.B and IV.D.

## BMP Summary Sheet

**MS4 Name:** City of Baxter, Minnesota

**Minimum Control Measure:** 7-SPECIAL WATERS & SPECIAL PROTECTION AREAS

**Permit Condition:** IV.D – Section 303D listings

**Unique BMP Identification Number:** 7a-1

**BMP Title:** Restricted Discharge and Impaired Waters Review Process

**BMP Description:**

The City will review discharges from the MS4 system to restricted discharge and impaired waters, as defined by the current USEPA approved 303(d) list. As part of this review, the City:

- Has identified the restricted discharge water that lies along the City’s southern jurisdictional boundary: the **Mississippi River**
- Has identified the impaired waters listed here that are within or immediately downstream of the City’s jurisdictional boundaries and that may be impacted by the MS4’s stormwater discharge. The listed impaired waters are:
  - Mississippi River** (mercury fish consumption advisory (FCA)  
The affected use is listed as ‘aquatic consumption’
- Has delineated the watershed areas that contribute to the above waters. Exhibits 7a-1.1 and 7a-1.2 show the watershed areas.
- Will continue to evaluate the hydrology, land use, and other characteristics of the watershed areas that may impact the impaired water as a result of a stormwater discharge from the MS4.

Based on the ongoing review process above, the City will determine if any changes to the existing stormwater system or BMPs are needed to minimize the impact of discharges from the MS4 to the restricted discharge and impaired waters.

**Measurable Goals:**

Restricted Discharge Water (Permit section IX.B 1 and 2)

1. Update the storm system map (BMP 3a-1). The map will be updated to include showing the watershed of special waters listed above.
2. Complete and submit an estimate of the existing and proposed impervious area in the watershed.
3. Complete a written summary and assessment. Summary will include conclusions reached during the City’s review, the decision making process used to determine what SWPPP revisions may be needed, and a projected schedule and timeline to incorporate any necessary changes into the SWPPP, if needed. Assessment will include how the City may be able to eliminate new or expanded discharges to the Mississippi River.

Impaired Water (Permit section IV.D)

4. Review whether changes in the City regulations, operations or SWPPP are warranted to reduce the impact of the City’s discharge to the impaired water.
5. Upon approval of a completed TMDL study by the MPCA, the City will respond as required to comply with requirements to reduce impact to the impaired water.

**Timeline/Implementation Schedule:**

1. and 2. Within 90 days of extension of coverage under this permit
3. and 4. Complete and submit at annual public meeting and with annual report
5. Upon approval of a completed TMDL study by the MPCA

**Specific Components and Notes:**

This process is to be reassessed annually over the course of the permit cycle. As new 303(d) lists with additional impaired waters listed are published in the future, the City will review changes to the list and conduct the necessary review of additional waters within or directly adjacent to its boundaries that may be impacted by the MS4’s stormwater discharges. When an approved TMDL study by the MPCA is finalized, the City intends to comply with the resulting permit requirements. We understand that waters impaired

due to mercury will be addressed by other agencies and that this pollutant will not be part of the City's review or responsibility under this BMP.

**Responsible Party for this BMP:**

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Department: City Engineer

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