

Utah Pollutant Discharge Elimination System Storm Water Program

Small MS4 Report Form

The purpose of this report is to contribute information to an evaluation of the UPDES small municipal separate storm sewer system (MS4) permit program. Consistent with 40 CFR §122.37 the Utah Department of Environmental Quality is assessing the status of the storm water program. A “no” answer to a question does not necessarily mean noncompliance with your permit or with the federal regulations. In order to establish the range of variability in the program it is necessary to ask questions along a fairly broad performance continuum.

1. MS4 Information

City of St. George

Name of MS4

Kristi Schultz Stormwater Manager

Name of Contact Person (First) (Last) (Title)

(435) 627-4142 kristi.schultz@sgcity.org

Telephone (including area code) Email

175 E 200 N

Mailing Address

St. George UT 84770
 City State ZIP code

What size population does your MS4 serve? 84,405 UPDES number UTR09000

What is the reporting period for this report? (mm/dd/yyyy) From 07/01/2018 to 06/30/2019

2. Water Quality Priorities

- A. Does your MS4 discharge to waters listed as impaired on a state 303(d) list? Yes No
- B. If yes, identify each impaired water, the impairment, whether a TMDL has been approved by EPA for each, and whether the TMDL assigns a wasteload allocation to your MS4. Use a new line for each impairment, and attach additional pages as necessary.

Impaired Water	Impairment	Approved TMDL		TMDL assigns WLA to MS4	
<u>Virgin River</u>	<u>Total Dissolved Solids</u>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<u>Santa Clara River</u>	<u>Total Dissolved Solids</u>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<u>Fort Pearce Wash</u>	<u>Total Dissolved Solids</u>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<u>_____</u>	<u>_____</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<u>_____</u>	<u>_____</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<u>_____</u>	<u>_____</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<u>_____</u>	<u>_____</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<u>_____</u>	<u>_____</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No

- C. What specific sources contributing to the impairment(s) are you targeting in your storm water program?
Sediment due to land disturbance activities which elevates TDS.
- D. Do you discharge to any high-quality waters (e.g., Tier 2, Tier 3, outstanding natural resource waters, or other state or federal designation)? Yes No
- E. Are you implementing additional specific provisions to ensure their continued integrity? Yes No

3. Public Education and Public Participation

- A. Is your public education program targeting specific pollutants and sources of those pollutants? Yes No
- B. If yes, what are the specific sources and/or pollutants addressed by your public education program?
Education was targeted to construction activities while fully implementing our CPOD permit process.
- C. Note specific successful outcome(s) (e.g., quantified reduction in fertilizer use; NOT tasks, events, publications) fully or partially attributable to your public education program during this reporting period.
Significant increase in enforcement and compliance in construction activities due to CPOD permit process.
- D. Do you have an advisory committee or other body comprised of the public and other stakeholders that provides regular input on your storm water program? Yes No
- E. Do you belong to a storm water coalition or other advisory committee? If yes, describe: Yes No
Dixie Stormwater Coalition and active participation in USWAC

4. Construction

- A. Do you have an ordinance or other regulatory mechanism stipulating:
 - Erosion and sediment control requirements? Yes No
 - Other construction waste control requirements? Yes No
 - Requirement to submit construction plans for review? Yes No
 - MS4 enforcement authority? Yes No
- B. Do you have written procedures for:
 - Reviewing construction plans? Yes No
 - Performing inspections? Yes No
 - Responding to violations? Yes No
- C. What is the threshold for construction storm water plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? CGP for over an acre and CPOD for less than an acre
- D. Identify the number of active construction sites \geq 1 acre in operation in your jurisdiction at any time during the reporting period. 194
- E. How many of the sites identified in 4.D did you inspect during this reporting period? 194
- F. Identify the number of active construction sites $<$ 1 acre in operation in your jurisdiction at any time during the reporting period. 386
- G. How many of the sites identified in 4.F did you inspect during this reporting period? 386
- H. Describe, on average, the frequency with which your program conducts construction site inspections.
Monthly
- I. Do you prioritize certain construction sites for more frequent inspections? Yes No
 If Yes, based on what criteria? Proximity to water bodies and/or sensitive areas
- J. Identify which of the following types of enforcement actions you used during the reporting period for construction activities, indicate the number of actions, or note those for which you do not have authority:

<input checked="" type="checkbox"/> Yes	Notice of violation	# <u>10</u>	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Administrative fines	# _____	No Authority <input type="checkbox"/>
<input checked="" type="checkbox"/> Yes	Stop Work Orders	# <u>1</u>	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Civil penalties	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Criminal actions	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Administrative orders	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Other _____	# _____	

- K. Do you use an electronic tool (e.g., GIS, data base, spreadsheet) to track the locations, inspection results, and enforcement actions of active construction sites in your jurisdiction? Yes No
- L. What are the 3 most common types of violations documented during this reporting period?
Improper BMP maintenance, not keeping SWPPPs amended and not doing required inspections.
- M. How often do municipal employees receive training on the construction program? weekly, monthly and annually

5. Illicit Discharge Elimination

- A. Have you completed a map of all outfalls and receiving waters of your storm sewer system? Yes No
- B. Have you completed a map of all storm drain pipes and other conveyances in the storm sewer system? Yes No
- C. Identify the number of outfalls in your storm sewer system. 264
- D. Identify the number of Class V injection wells in your jurisdiction. 0
- E. Do you have documented procedures, including frequency, for screening outfalls? Yes No
- F. Of the outfalls identified in 5.C, how many were screened for dry weather discharges during this reporting period?
63
- G. Of the outfalls identified in 5.C, how many have been screened for dry weather discharges at any time since you obtained MS4 permit coverage? 264
- H. What is your frequency for screening outfalls for illicit discharges? Describe any variation based on size/type.
At least once in a five year period, or more often if high priority site or suspected discharge.
- I. Do you have an ordinance or other regulatory mechanism that effectively prohibits illicit discharges? Yes No
- J. Do you have documented procedures for tracing and removing an illegal discharge? Yes No
- K. Do you have an ordinance or other regulatory mechanism that provides authority for you to take enforcement action and/or recover costs for addressing illicit discharges? Yes No
- L. During this reporting period, how many illicit discharges/illegal connections have you discovered? 10
- M. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated?
10
- N. Identify which of the following types of enforcement actions you used during the reporting period for illicit discharges, indicate the number of actions, or note those for which you do not have authority:

<input checked="" type="checkbox"/> Yes	Notice of violation	# <u>10</u>	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Administrative fines	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Stop Work Orders	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Civil penalties	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Criminal actions	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Administrative orders	# _____	No Authority <input type="checkbox"/>
<input type="checkbox"/> Yes	Other _____	# _____	
- O. How often do municipal employees receive training on the illicit discharge program? Upon hire and annually

6. Storm Water Management for Municipal Operations

- A. Have storm water pollution prevention plans (or an equivalent plan) been developed for:
- All public parks, ball fields, other recreational facilities and other open spaces Yes No
 - All municipal construction activities, including those disturbing less than 1 acre Yes No
 - All municipal turf grass/landscape management activities Yes No
 - All municipal vehicle fueling, operation and maintenance activities Yes No
 - All municipal maintenance yards Yes No
 - All municipal waste handling and disposal areas Yes No
- Other St. George Regional Airport
- B. Are storm water inspections conducted at these facilities? Yes No
- C. If Yes, at what frequency are inspections conducted? Daily observation, weekly, quarterly
- D. List activities for which operating procedures or management practices specific to storm water management have been developed (e.g., road repairs, catch basin cleaning).
Street sweeping, road repairs, catch basin cleaning, water/sewer line repairs
- E. Do you prioritize certain municipal activities and/or facilities for more frequent inspection? Yes No
- F. If Yes, which activities and/or facilities receive most frequent inspections? All maintenance facilities
- G. How are you disposing of catch basin decant water and solid material?
Collect and process at Waste Water Treatment Plant
- H. Are municipal vehicles washed into an approved wastewater disposal system? Yes No
- I. Do all municipal employees and contractors overseeing planning and implementation of storm water-related activities receive comprehensive training on storm water management? Yes No
- J. If yes, do you also provide regular updates and refreshers? Yes No
- K. If so, how frequently and/or under what circumstances? New hires and/or training on program updates

7. Long-term (Post-Construction) Storm Water Measures

- A. Do you have an ordinance or other regulatory mechanism to require:
- Site plan reviews for storm water/water quality of all new and re-development projects? Yes No
 - Long-term operation and maintenance of storm water management controls? Yes No
 - Retrofitting to incorporate long-term storm water management controls? Yes No
- B. If you have retrofit requirements, what are the circumstances/criteria?
Tenant improvements/additions that expand from the original footprint and any illicit discharges
- C. What are your criteria for determining which new/re-development storm water plans you will review (e.g., all projects, projects disturbing greater than one acre, etc.) All projects disturbing greater than one acre
- D. Do you require water quality or quantity design standards or performance standards, either directly or by reference to a state or other standard, be met for new development and re-development? Yes No
- E. Do these performance or design standards require that pre-development hydrology be met for:
- Flow volumes Yes No
 - Peak discharge rates Yes No
 - Discharge frequency Yes No
 - Flow duration Yes No

- F. Please provide the URL/reference where all post-construction storm water management standards can be found.
sgcity.org (Code 9-14-5)
- G. How many development and redevelopment project plans were reviewed during the reporting period to assess impacts to water quality and receiving stream protection? 102
- H. How many of the plans identified in 7.G were approved? 102
- I. How many privately owned permanent storm water management practices/facilities were inspected during the reporting period? 14
- J. How many of the practices/facilities identified in I were found to have inadequate maintenance? 0
- K. How long do you give operators to remedy any operation and maintenance deficiencies identified during inspections?
Varies on severity of non-compliance
- L. Do you have authority to take enforcement action for failure to properly operate and maintain storm water practices/facilities? Yes No
- M. How many formal enforcement actions (i.e., more than a verbal or written warning) were taken for failure to adequately operate and/or maintain storm water management practices? 0
- N. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track post-construction BMPs, inspections and maintenance? Yes No
- O. Do all municipal departments and/or staff (as relevant) have access to this tracking system? Yes No
- P. How often do municipal employees receive training on the post-construction program? Annual+LID training

8. Program Resources

- A. What was the annual expenditure to implement MS4 permit requirements this reporting period? \$210,300
- B. What is next year's budget for implementing the requirements of your MS4 NPDES permit? \$270,000
- C. This year what is/are your source(s) of funding for the storm water program, and annual revenue (amount or percentage) derived from each?

Source: <u>General/Drainage Utility Fund</u>	Amount \$ <u>210,300</u> OR % <u> </u>
Source: _____	Amount \$ _____ OR % _____
Source: _____	Amount \$ _____ OR % _____
- D. How many FTEs does your municipality devote to the storm water program (specifically for implementing the storm water program; not municipal employees with other primary responsibilities)? 3
- E. Do you share program implementation responsibilities with any other entities? Yes No

Entity	Activity/Task/Responsibility	Your Oversight/Accountability Mechanism
<u>Dixie Stormwater Coalition</u>	<u>Unification on ordinance, LID, training, outreach</u>	<u>Participant</u>
<u>USWAC</u>	<u>Represent Dixie Coalition and sub-committee member</u>	<u>Participant</u>
_____	_____	_____

9. Evaluating/Measuring Progress

A. What indicators do you use to evaluate the overall effectiveness of your storm water management program, how long have you been tracking them, and at what frequency? These are not measurable goals for individual management practices or tasks, but large-scale or long-term metrics for the overall program, such as macroinvertebrate community indices, measures of effective impervious cover in the watershed, indicators of in-stream hydrologic stability, etc.

Indicator	Began Tracking (year)	Frequency	Number of Locations
Street Sweeping Miles	2018	7,407 miles	
Street Sweeping Tailings	2018	1,135.44 tons	
Storm drain pipe cleaning	2018	13,541.91 feet	
Fully implemented CPOD program	2018	During reporting period	386
IDDE & Construction Violations	2018	During reporting period	20

B. What environmental quality trends have you documented over the duration of your storm water program? Reports or summaries can be attached electronically, or provide the URL to where they may be found on the Web.

The City of St. George realizes the importance of keeping documents current and updated such as Storm Water Management Plan (SWMP), Standard Operating Procedures (SOP's), ordinances, website, etc. The goals for 2019-2020 will be focused around updating all documents relevant to the storm water program.

Emphasis will also be on updating our Post-Construction and MS4 Good Housekeeping stormwater programs, as well as creating a unified LID program with the Dixie Stormwater Coalition.



10. Additional Information

In the space below, please include any additional information on the performance of your MS4 program. If providing clarification to any of the questions on this form, please provide the question number (e.g., 2C) in your response.

HIGHLIGHTS ON THE CITY OF ST. GEORGE'S STORMWATER PROGRAM FOR THIS REPORTING PERIOD:

- Updating our software to more accurately review/track SWPPP's prior to subsequent permitting from other departments
- Re-evaluating/updating our Storm Water Management Plan and SOP's
- Updating our website to better serve the St. George community and city employees in all six minimum control measures
- Proposed to City Council and adopted a fine and penalty process/ordinance
- Fully implemented our Common Plan of Development program
- Promote and actively involved in the Dixie Stormwater Coalition and USWAC to remain current in all aspects of the permits
- Increased the frequency of our meetings with the Dixie Stormwater Coalition to create a unified LID program
- Coordinated efforts with Dixie Stormwater Coalition to present at the 4th Grade Water Fair and Cotton Days Outreach
- Continually run ongoing public service announcements with Cherry Creek Media to promote storm water awareness on behalf of the Dixie Stormwater Coalition
- The city created and filled a new position for a full-time employee to assist with Minimum Control Measures 5 and 6; Post Construction and Good Housekeeping for MS4 Operations
- Kristi Schultz is an RSI instructor and became an RSW instructor during this reporting period
- The city currently has nine employees that have attended the Registered Stormwater Inspector training
- The city sent a mass mailing to concrete contractors/suppliers regarding UPDES regulations pertaining to washout
- Utilized existing programs such as city clean-up days for the Iron Man, St. George Marathon, Transportation Expo and spring and fall Clean-Up Days to promote storm water awareness for public education and participation
- Presented with Chuck Gillett from Ivin's city on storm water awareness at a Lunch and Learn hosted by Southern Utah Home Builders Association (SUBA)
- Participated in a well attended panel discussion for "SWPPP Smart" hosted by Associated General Contractors (AGC) and SUBA

Certification Statement and Signature

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. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Yes

Kristi Schultz, Stormwater Manager 

09/23/2019

Name of Certifying Official, Title

Date (mm/dd/yyyy)