

**STORMWATER MANAGEMENT PROGRAM
CITY OF GRANDVIEW, MISSOURI**

Information on the Permittee:

Name of the Permittee: City of Grandview, Missouri

Type of Entity: City - Municipality

Total Area (acres): 15 sq. miles = 9600 acres

Mailing Address: 1200 Main Street, Grandview, MO 64030

Primary Contact: Lawrence N. Creek

Phone Number: (816) 316-4855

Secondary Contact: Larry Finley

Phone Number: (816) 316-4857

Information on the Municipal Separate Storm Sewer System:

MS4 System Location: Grandview, Missouri

Name of Organization: City of Grandview, Missouri MS4

County Permittee Resides: Jackson County

The major receiving waters within the permitted area include:

Blue River, Little Blue River, and Oil Creek

Segments of the Blue River are on the latest CWA's list of impaired waters. These segments are in excess of 2 miles downstream.

Information on Adjacent Waterways:

The Permittee is within 100 feet of: Streams or lakes

The Permittee is within 100 feet of waters classified as major reservoirs

Longview Lake

Grandview does not have any areas defined as wetland.

Grandview will require a CWA, Section 404 permit, if a wetland is constructed in the area.

Stormwater from Grandview does not discharge to a sinkhole.

Information on Critical Areas:

There are threatened or endangered species in the area: See Page 2 for listing

The Permittee has met eligibility criteria for protection of threatened or endangered species.

There are critical habitats in the area: See Page 2 for listing

The Permittee has met eligibility criteria for protection of critical habitats.

The historic properties in the area: See Page 2 for listing

The Permittee has met eligibility criteria for protection of historic properties.

Endangered Species:

County	Species	Status	Habitat
Jackson	Bald Eagle (<i>Haliaeetus Leucocephalus</i>)	Threatened	

Historic Properties:

Name	Address	Owner	Year Added
Young, Solomon, Farm – Truman, Harry S., Farm	12121 and 12301 Blue Ridge Extension, Grandview	Federal Gov't	1978

MCM #1: Public Education and Outreach on Stormwater Impacts

4.2.1.1 Permit Requirements

Grandview plans to continue its public education program which is achieved by distributing educational materials to the community and conducting outreach activities. The focus of these efforts will be to educate the public with activities discussing the impact of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.

4.2.1.2 Decision Process

The target pollutants were identified and prioritized for the first permit. The actions that impact the target pollutants were identified. The public education program was designed to impact the actions identified. Nothing has changed regarding this.

The following is a prioritized list of the leading pollutants, experienced in the permitted area, that are carried by stormwater runoff into nearby water bodies. (1 = having most impact and 10 = having least impact)

<u>1</u>	Suspended Solids
<u>3</u>	Nutrients
<u>7</u>	Pesticides
<u>6</u>	Metals
<u>9</u>	Bacteria
<u>8</u>	Oxygen-Depleting Substances (BOD & other organics)
<u>2</u>	Oil and Grease
<u>4</u>	Salinity (Salt)
<u>5</u>	Priority Toxic Organic Chemicals (Household Hazardous Waste Pesticide/Herbicides)
<u>N/A</u>	Habitat Alterations
<u>10</u>	Floatables
<u>N/A</u>	Temperature

4.2.1.2.1 Inform Public on Steps

Grandview plans to continue its current information and improve on the information provided individuals and households in the community about the steps they can take to reduce stormwater pollution with the following educational programs:

	Year 1	Year 2	Year 3	Year 4	Year 5
Educational Materials:					
Post Information on Website	X	X	X	X	X
Maintain a Library of Stormwater Educational Materials	X	X	X	X	X
Distribute Brochures:					
Lawn and Garden Activities	X	X	X	X	X
Water Conservation (in conjunction with JCPWSD #1)	X				
Hazardous Waste Disposal	X	X	X	X	X
Trash Management	X	X	X	X	X
Illicit Discharges			X	X	X

	Year 1	Year 2	Year 3	Year 4	Year 5
Public Awareness:					
Post Storm Water Quality Signs in Public Buildings	X	X	X	X	X
Issue Press Release Regarding Local Storm Water Issues	X	X	X	X	X
Show Storm Water Info on Local TV Station	X	X	X	X	X
Publish Articles in Local Newspaper	X	X	X	X	X

4.2.1.2.2 How to Become Involved

Grandview plans to inform individuals and groups on how to become involved in the stormwater pollution prevention program by providing helpful information in all materials distributed to the public. This is described in more detail in Section 4.2.2, Public Involvement and Participation.

4.2.1.2.3 Target Audiences

During the development of the education program, Grandview identified the sources of stormwater pollutants that needed to be reduced to improve overall water quality. The target audiences were selected because changing their behavior would have a significant stormwater quality impact on the target pollutants. The target audiences for the public education program are:

1. Citizens (Homeowners)
2. Developers and Home Builders
3. Business Owners
4. Elected Officials
5. City Staff
6. Homeowners Associations

4.2.1.2.4 Target Pollutant Sources

The target pollutant sources having a major impact on stormwater quality were identified. The following is a list of these sources that are experienced in the permitted area. (1 = Major impact, 2 = Minor impact, 3 = Not an impact)

1	Construction activities (sediment, construction chemicals and debris, solid and sanitary wastes)
2	Overapplication of fertilizer, herbicides, pesticides
2	Improper disposal of paint and household hazardous chemicals
3	Pet waste contamination
2	Improper disposal of waste oil, grease, and gasoline disposal
1	Trash, debris, and illegal dumping
2	Detergents washed into drains
1	Snow removal (salt, sand and snow disposal)
2	Sanitary sewer overflows
2	Infiltration from cracked sanitary sewers
2	Failing septic systems
2	Sewer service connections to storm drainage system
3	Foundation drains connected to storm drainage system
3	Downspouts connected to storm drainage system
N/A	Lake or water body used for motor boating
2	Spills from roadway accidents or fires
1	Connected impervious areas covering large areas (such as malls, institutions with large parking areas)
1	Stream bank erosion
N/A	Waste transfer station

4.2.1.2.5 Outreach Strategy & Partnerships

Grandview's outreach strategy is to implement a variety of methods to reach a number of different target audiences at multiple times. To change behavior, repetition is important. The mechanisms for the public outreach program are described in 4.2.1.2.1 of this permit application.

Grandview's strategy is to partner with other governmental and non-governmental entities to execute the public outreach strategy. The idea is to share information and resources when possible. The following entities will be assisting with the effort:

1. Local Community Groups
2. Regional Planning Organization (MARC)

The number of people targeted to be reached by the public education and outreach strategy is **5,000** per year.

4.2.1.2.6 Person Responsible

The person responsible for overall management and implementation of the permittee's stormwater public education and outreach program is the **PUBLIC WORKS DIRECTOR** of Grandview. Others may be involved in the execution of each of the individual activities in the programs.

4.2.1.2.7 Measurable Goals Selection

Grandview selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact on the target pollutants identified as a concern for Grandview. The public education and outreach BMPs were also selected because many have been effective methods of communicating with the public for our community. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #2: Public Involvement and Participation

4.2.2.1 *Permit Requirements*

Grandview will comply with State and Local public notice requirements when implementing the public involvement and participation program.

4.2.2.2 *Decision Process*

The following sections include the documentation for Grandview's decision process and rationale statement for the development of a stormwater public involvement and participation program. It documents the overall program and the individual BMPs, measurable goals, and responsible party for the program.

4.2.2.2.1 *Involving the Public in Developing the Submittal*

Grandview has involved the public in the development and submittal of their application and stormwater management program in the following activities:

1. Held Stakeholder Meetings
2. Held Public Hearings
3. Held Public Meetings
4. Posted Public Meeting Announcements

4.2.2.2.2 *Involving the Public in Program Implementation*

Grandview plans to actively involve the public in the implementation of their stormwater pollution prevention program through a number of different methods. These methods were selected (1) because they are effective methods currently used by Grandview or (2) because the BMPs are listed in EPA's guidance documents as effective public involvement methods.

4.2.2.2.3 *Target Audiences to Involve in Program*

The target audiences for the permittee's public involvement and participation program are:

1. Citizens (Homeowners)
2. Mass Media
3. Local Elected Officials
4. Business Leaders
5. Homeowners Associations

4.2.2.2.4 *Public Involvement Activities*

Grandview plans will continually involve the public through the activities listed below:

	Year 1	Year 2	Year 3	Year 4	Year 5
Establish Community Hotline	X	X	X	X	X
Hold Public Meetings	X	X	X	X	X

4.2.2.2.5 Person Responsible

The person responsible for the overall management and implementation of the permittee’s stormwater public involvement and participation program is the **PUBLIC WORKS DIRECTOR** of Grandview. Others may be involved in the execution of each of the individual activities in the programs.

4.2.2.2.6 Goal Selected

Grandview selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact on the target pollutants identified as a concern for Grandview. Some of the public involvement and participation methods selected were also chosen because they have been used effectively by Grandview in the past. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #3: Illicit Discharge Detection and Elimination

4.2.3.1 Permit Requirement

4.2.3.1.1 Overview

Grandview will develop, implement and enforce a program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200) into their small MS4.

4.2.3.1.2 Map

Grandview has developed and will continue to maintain and update a storm sewer system map, showing the locations of all outfalls and the names and locations of all waters of the State that receive discharges from those outfalls.

The map will be updated using the following techniques:

	Year 1	Year 2	Year 3	Year 4	Year 5
Storm Sewer Mapping	X	X	X	X	X
Piping Schematic Review	X	X	X	X	X
Aerial Photography			X		
Sewer Maintenance Records	X	X	X	X	X
Public Complaints	X	X	X	X	X

4.2.3.1.3 Enforcement

Grandview will effectively prohibit non-stormwater discharges into Grandview's stormwater system via the following ordinances and regulations. Each ordinance/regulation is enforceable by Grandview with appropriate procedures and consequential actions.

4.2.3.1.4 Methods to Detect

Grandview will implement and maintain a plan using the following methods to detect and address non-stormwater discharges, including illegal dumping to the stormwater system:

	Year 1	Year 2	Year 3	Year 4	Year 5
Complaint-Driven Inspections of System	X	X	X	X	X
Public Complaints	X	X	X	X	X

4.2.3.1.5 *Informing the Public*

Grandview will inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste using the following methods:

	Year 1	Year 2	Year 3	Year 4	Year 5
Educational Programs:					
Procedural Training for City Staff	X	X	X	X	X
Distribute Literature	X	X	X	X	X
Recycling Program for Household Hazardous Waste	X	X	X	X	X

4.2.3.1.6 *Not Significant Contributors*

Grandview has not identified any of the following categories of non-stormwater discharges or flows (i.e. illicit discharges) as significant contributors of pollutants to their small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined in 10 CSR 20-6.200), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, springs, water from crawl space pumps, footing drains, lawn watering, flows from riparian habitats and wetlands, and street wash water (discharges or flows from fire fighting activities are excluded from the effective prohibition against non-stormwater and will only be addressed where they are identified as significant sources of pollutants to waters of the State.)

4.2.3.1.7 *Occasional Incidental Non-Stormwater Discharges*

Grandview's illicit discharge ordinance does not include a list of other similar occasional incidental non-stormwater discharges (e.g. non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges because they are not reasonably significant sources of pollutants to the MS4. Should these occasional or incidental non-stormwater discharges be identified in the future, those entities responsible for discharging will be prohibited or conditions placed on them so as to minimize their discharge of pollutants.

4.2.3.2 *Decision Process*

Grandview has documented their decision process for the development of a stormwater illicit discharge detection and elimination program. Grandview's rationale statement addresses both their overall illicit discharge detection and elimination program, and the individual BMPs, measurable goals, and responsible persons for their program.

4.2.3.2.1 Sources for Mapping

Grandview will update and maintain a storm sewer map showing the locations of all outfalls and the names and locations of all receiving waters. Grandview used the following sources to compile the maps:

1. Storm Sewer Mapping
2. Piping Schematic Review
3. Aerial Photography
4. Sewer Maintenance Records
5. Public Complaints

Grandview will use development plans, proposed building plans, and capital project plans to locate new outfalls and update the maps.

4.2.3.2.2 Regulatory Mechanism

Grandview will use the following mechanisms to effectively prohibit illicit discharges to the MS4:

1. City Ordinance
2. Inspection upon Complaint

Ordinances are commonly used by Grandview to establish laws and set forth the enforcement mechanisms. Ordinances establish legal authority: to regulate the contribution of pollutants to the municipal separate storm sewer system (MS4) of stormwater discharges by any use; to prohibit illicit connections and discharges to the MS4; and to establish legal authority to carry out all inspections, surveillance and monitoring procedures necessary to ensure compliance.

Grandview will implement and maintain the following mechanisms to effectively prohibit illicit discharges to the MS4 on the following schedule:

	Year 1	Year 2	Year 3	Year 4	Year 5
City Ordinance		X			
Inspection upon Complaint	X	X	X	X	X

4.2.3.2.3 Enforcement

Grandview will set forth in the ordinance enforcement procedures intended to remove the source of the illicit discharge detected.

Grandview will implement and maintain the mechanisms described in 4.2.3.2.2 above with the following enforcement actions:

	Year 1	Year 2	Year 3	Year 4	Year 5
Civil Penalties		X	X	X	X

4.2.3.2.4 Detection

Grandview will detect and address illicit discharges to the MS4, including discharges from illegal dumping and spills. Grandview’s program will address on-site sewage disposal systems that flow into the MS4.

4.2.3.2.4.1 Identify Priority Areas

Grandview will use the system maps identified in 4.2.3.1.2 above and other data to identify priority areas with likelihood of illicit connections.

4.2.3.2.4.2 Trace the Source

N/A

4.2.3.2.4.3 Removal

Grandview will follow the ordinance adopted and the enforcement mechanisms detailed in the ordinance including those legal actions described in 4.2.3.2.3 above to enforce the removal of an identified illicit connection.

4.2.3.2.4.4 Program Evaluation

The success of the described program will be evaluated annually by analyzing the number of illicit connections discovered and eliminated.

4.2.3.2.5 Public Information

Grandview will inform public employees, business and the general public of hazards associated with illegal discharges and improper disposal of waste through the following methods:

	Year 1	Year 2	Year 3	Year 4	Year 5
Educational Programs:					
Procedural Training for City Staff	X	X	X	X	X
Distribute Literature		X	X	X	X
Recycling Program for Household Hazardous Waste	X	X	X	X	X

Where applicable the information distributed through these means will coordinate with the information distributed in Grandview's public education and outreach program (e.g., consistent/coordinated messages in literature).

4.2.3.2.6 Responsible Party

The **PUBLIC WORKS DIRECTOR** will be responsible for overall management and implementation of Grandview's stormwater illicit discharge detection and elimination program. Others will be involved in the execution of each of the individual activities in the programs.

4.2.3.2.7 Measurable Goals

Grandview will evaluate the success of the program based on:

The number of illicit connections found and eliminated.

Grandview selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact on the target pollutants identified as a concern for Grandview. Some of the methods to detect and eliminate illicit discharges were also chosen because they have been used effectively by Grandview in the past. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #4: Construction Site Stormwater Runoff Control

4.2.4.1 Permit Requirements

Grandview plans to develop, implement, and enforce a program to reduce pollutants in any stormwater runoff from construction activities that result in disturbance of greater than or equal to one acre. Grandview also plans to reduce pollutants in stormwater runoff from construction activities that disturbs an area less than one acre if the site is part of a larger common plan of development or sale.

4.2.4.1.1 Regulatory Mechanism

Grandview will draft an ordinance or other regulatory mechanism with the required erosion and sediment controls, as well as sanctions to ensure compliance.

4.2.4.1.2 Best Management Practices (BMPs)

Grandview will require construction site operators to implement the appropriate erosion and sediment control Best Management Practices (BMPs). Grandview will adopt the Kansas City Metro American Public Works Association (APWA)'s Erosion and Sediment Control Manual in their ordinance which includes the construction specifications and design standards.

4.2.4.1.3 Wastes to Be Controlled

Grandview will require construction site operators to control wastes that may cause adverse impacts to water quality such as:

1. Discarded Building Materials
2. Sediment
3. Litter or Trash
4. Sanitary Waste

4.2.4.1.4 Site Plan Review

Grandview will implement and maintain procedures in their ordinance for site plan review, which will incorporate consideration of potential water quality impacts.

4.2.4.1.5 Receipt & Consideration of Public Comment

Grandview will not implement procedures in their ordinance for receipt and consideration of information submitted by the public.

4.2.4.1.6 Site Inspection

Grandview will implement and maintain procedures in their ordinance for site inspection and enforcement of erosion and sediment control measures.

4.2.4.2 Decision process

The following sections include the rationale statement for the development of Grandview’s overall construction site stormwater runoff control program. It documents the individual BMPs, measurable goals, and responsible party for their program.

4.2.4.2.1 Regulatory Mechanism

Grandview will draft an ordinance that will require the use of erosion and sediment controls on construction sites. An ordinance will outline the requirements for designers and contractors before, during and after the construction activities. The ordinance will provide enforcement measures for those designers and contractors who do not follow the ordinance.

Other resources will be available in the Kansas City Metro American Public Works Association (APWA)’s Erosion and Sediment Control Manual for those people involved in design and construction of erosion and sediment control activities. Those resources include:

	Year 1	Year 2	Year 3	Year 4	Year 5
Design Methodologies	X				
BMP Fact Sheets	X				
Sample Plans	X				
Construction Specifications	X				
Standard Details	X				
Ordinance	X				
Staff Training	X				

4.2.4.2.2 Enforcement

Grandview will ensure compliance with the developed ordinance by including an enforcement section in the ordinance detailing the sanctions and enforcement mechanisms. Grandview will use the following sanctions:

1. Non-Monetary Penalties (such as Stop Work Orders)
2. Fines

4.2.4.2.3 Implementation of Proper Controls

Grandview will require construction site operators to control wastes that may have adverse impacts on water quality with the following method:

	Year 1	Year 2	Year 3	Year 4	Year 5
Implementation of proper erosion and sediment controls	X				

4.2.4.2.4 Pre-Construction Site Plan Review

Grandview will implement and maintain procedures for site plan review, including the review of pre-construction plans, which will look at the potential water quality impacts. Grandview will implement and maintain procedures and rationale for those sites that do not require site plan review. The estimated percentage of sites that will have a plan review performed by the city is 100%.

	Year 1	Year 2	Year 3	Year 4	Year 5
Review of Construction Plans	X	X	X	X	X

4.2.4.2.5 Public Input on Submittals

Grandview will not implement procedures for receipt and consideration of information submitted by the public.

4.2.4.2.6 Site Inspection & Enforcement

Grandview will implement and maintain procedures for site inspection and enforcement of control measures. The sites will be inspected using a priority rating system. The site with the most potential risk to the community will be top on the priority list.

	Year 1	Year 2	Year 3	Year 4	Year 5
Site Inspection and Enforcement	X	X	X	X	X

4.2.4.2.7 Person Responsible

The person responsible for overall management and implementation of the permittee's construction site stormwater runoff control program is the **PUBLIC WORKS DIRECTOR**. Others will be involved in the execution of each of the individual activities in the programs.

4.2.4.2.8 Measurable Goals

Grandview selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact on the target pollutants identified for Grandview. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #5: Post-Construction Stormwater Management in New Development and Redevelopment

4.2.5.1 Permit Requirement

4.2.5.1.1 Overview

Grandview will develop, implement, and enforce a program to address post-construction stormwater runoff in new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale.

4.2.5.1.2 Strategies

Grandview will develop and implement strategies, which will include a combination of structural and/or non-structural Best Management Practices (BMPs), appropriate for the community.

4.2.5.1.3 Ordinance

Grandview will use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or Local law. Grandview will adopt the new Kansas City Metro American Public Works Association (APWA)'s Section 5600 in their ordinance.

4.2.5.1.4 Long-Term Operation & Maintenance

Grandview will ensure adequate long-term operation and maintenance of BMPs.

4.2.5.2 Decision Process

The following sections include the rationale statement for the development of a post-construction stormwater management program. It documents the BMPs, measurable goals, and responsible party for the program.

4.2.5.2.1 *Priority Areas*

Grandview will implement regulatory procedures to address stormwater runoff from new development and redevelopment projects. There are no areas identified as a priority for regulatory procedures.

4.2.5.2.2 *Regulatory Procedures*

Grandview will implement regulatory procedures that will be specifically tailored for the community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.

	Year 1	Year 2	Year 3	Year 4	Year 5
Ordinance			X		
Publication of BMPs			X		

4.2.5.2.3 *Non-Structural Best Management Practices (BMPs)*

4.2.5.2.3.1 *Policies & Ordinances*

Grandview will implement policies and ordinances that will help minimize water quality impacts.

	Year 1	Year 2	Year 3	Year 4	Year 5
Direct Growth to Identified Areas	X				
Protect Sensitive Areas, such as Wetlands and Riparian Areas	X				
Maintain and/or Increase Open Space	X				

4.2.5.2.3.2 *Infill Development*

N/A

4.2.5.2.3.3 *Education*

Grandview will implement education programs for developers and the public about project designs that minimize water quality impacts.

4.2.5.2.3.4 Other Non-Structural Measures

N/A

4.2.5.2.4 Structural BMPs

4.2.5.2.4.1 Structural BMPs

Grandview will implement and maintain the following structural BMPs:

	Year 1	Year 2	Year 3	Year 4	Year 5
Detention/Retention	X	X	X	X	X

4.2.5.2.5 Regulatory Mechanism

Grandview will implement an ordinance or other regulatory mechanism to address post-construction runoff in new developments and redevelopments. These mechanisms will help to not only recommend proper practices, but will help enforce the proper use of the practices under certain circumstances. They include:

	Year 1	Year 2	Year 3	Year 4	Year 5
Ordinance			X		
Publication of BMPs			X		

Grandview will ensure compliance with the developed ordinance by way of sanctions and enforcement mechanisms. Grandview will implement the following sanctions in their ordinance:

1. Non-Monetary Penalties (such as Stop Work Orders)
2. Fines

4.2.5.2.6 Long-Term Operation & Maintenance

Grandview will implement options to help ensure the long-term operation and maintenance of their selected BMPs. These options will help ensure that future O&M responsibilities are clearly identified.

4.2.5.2.7 *Responsible Party*

The person responsible for overall management and implementation of the permittee's post-construction stormwater management program is the **PUBLIC WORKS DIRECTOR**. Others will be involved in the execution of each of the individual activities in the programs.

4.2.5.2.8 *Measurable Goals*

Grandview selected the measurable goals for each of the BMPs after reviewing EPA & ASCE research on the effectiveness of certain BMPs. The BMPs selected were chosen because of the evidence that they will have a positive impact on the target pollutants identified as a concern for Grandview. The implementation of BMPs selected will determine the success of the measure on water quality.

MCM #6: Pollution Prevention/Good Housekeeping for Municipal Operations

4.2.6.1 Permit Requirement

4.2.6.1.1 Overview

Grandview has developed and implemented an operation and maintenance program that has the ultimate goal of preventing or reducing pollutant runoff at its Public Works facility. Grandview will continue to improve on operations at this facility and expand its program to include other municipal operations with the goal of reducing pollutant runoff at all municipal facilities.

4.2.6.1.2 Training

Using training materials that are available from EPA, State and other organizations, Grandview's program will include employee training to prevent and reduce stormwater pollution from activities.

4.2.6.2 Decision Process

Grandview has documented their decision process for the development of a pollution prevention/good housekeeping program for municipal operations. Grandview's rational statement addresses their overall pollution prevention/good housekeeping program and the individual BMP's, measurable goals, and responsible persons for the program. The rational statement is outlined in the following sections.

4.2.6.2.1 Pollution Prevention & Good Housekeeping Measures

Grandview will implement and maintain pollution prevention and good housekeeping measures in the following City activities:

	Year 1	Year 2	Year 3	Year 4	Year 5
Street Sweeping	X	X	X	X	X
Recycling Program	X	X	X	X	X
Minimize Pesticides Used	X	X	X	X	X
Proper Disposal of Waste from Storm Sewer System	X	X	X	X	X
Employee Training	X	X	X	X	X

4.2.6.2.2 *Employee Training*

Grandview will implement and/or maintain an employee-training program in the following areas so as to prevent and reduce stormwater pollution from the following activities:

	Year 1	Year 2	Year 3	Year 4	Year 5
Park and Open Space Maintenance		X	X	X	X
Fleet and Building Maintenance	X	X	X	X	X
New Construction and Land Disturbances	X	X	X	X	X
Street Maintenance	X	X	X	X	X
Snow Removal Operations	X	X	X	X	X

These activities will be coordinated with the outreach programs developed for the public information and illicit discharge minimum control measures so that a consistent message is presented throughout Grandview's program.

4.2.6.2.3 *Activities*

Grandview's program will address the following areas:

4.2.6.2.3.1 *Clean Up Activities*

The following activity will be continued in order to maintain the reduction of the floatables and other pollutants in the MS4:

	Year 1	Year 2	Year 3	Year 4	Year 5
Street Sweeping	X	X	X	X	X

4.2.6.2.3.2 *Pollutant Locations*

Grandview would like to reduce or eliminate the discharged pollutants from the following locations:

1. Streets
2. Municipal Parking Lots
3. Fleet or Maintenance Shops with Outdoor Storage Areas

The following controls and/or programs will be implemented to reduce or eliminate the discharge of pollutants from facilities owned by Grandview:

	Year 1	Year 2	Year 3	Year 4	Year 5
Recycling Program	X	X	X	X	X
Minimize Pesticides Used	X	X	X	X	X
Proper Disposal of Waste from Storm Sewer System	X	X	X	X	X
Employee Training	X	X	X	X	X

4.2.6.2.3.3 Pollutant Removal

Grandview has implemented training procedures for the removal of dredge spoil, accumulated sediments, floatables, and other debris. Grandview will continue to reinforce this training with new as well as existing employees.

4.2.6.2.3.4 Flood Management

Grandview will review their current regulations concerning flood management to ensure they allow for:

1. Assessment and implementation of solutions that address impacts to water quality for new projects and;
2. Review of existing projects for inclusion of water quality aspects.

4.2.6.2.4 Responsible Party

The **PUBLIC WORKS DIRECTOR** will be responsible for overall management and implementation of the pollution prevention and good housekeeping program for Grandview. Others will be involved in the execution of each of the individual activities in the programs.

4.2.3.2.5 Program Evaluation

Grandview will evaluate the success of the pollution prevention/good housekeeping minimum control measure by tracking the progress of each measure against the implementation schedule. Each one of the measures described in this permit was chosen based on its implementability by Grandview staff and impact on water quality.