

**STORMWATER  
MANAGEMENT PLAN  
LIBERTY, MO**

**OCTOBER, 2007**

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**WATER PROTECTION PROGRAM**

Prepared By:

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**SMALL MS4 STORM WATER MANAGEMENT PROGRAM**  
**FOR LIBERTY, MO**

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**PART I  
CITY OF LIBERTY  
BACKGROUND**

## **City of Liberty Background**

### Information on the Permittee:

Name of the Permittee: City of Liberty, Missouri

Type of Entity: City - Municipality

Total Area (acres): 28.9 sq. miles

Mailing Address: 101 E. Kansas, Liberty, MO 64068

Primary Contact: Brian Hess, P.E.

Phone Number: 816-792-6000 x 3170

Secondary Contact: Steve Hansen

Phone Number: 816-792-6000 x 3104

Population (2000): 26,232

### Information on the Municipal Separate Storm Sewer System:

MS4 System Location: Liberty, Missouri

Name of Organization: City of Liberty, Missouri

County(ies) Permittee Resides: Clay County

The major receiving waters within the permitted area include: Cates Branch Creek, Town Branch Creek, Little Shoal Creek, Rush Creek

None of the receiving waters are on the latest CWA's list of impaired waters.

### Information on Adjacent Waterways:

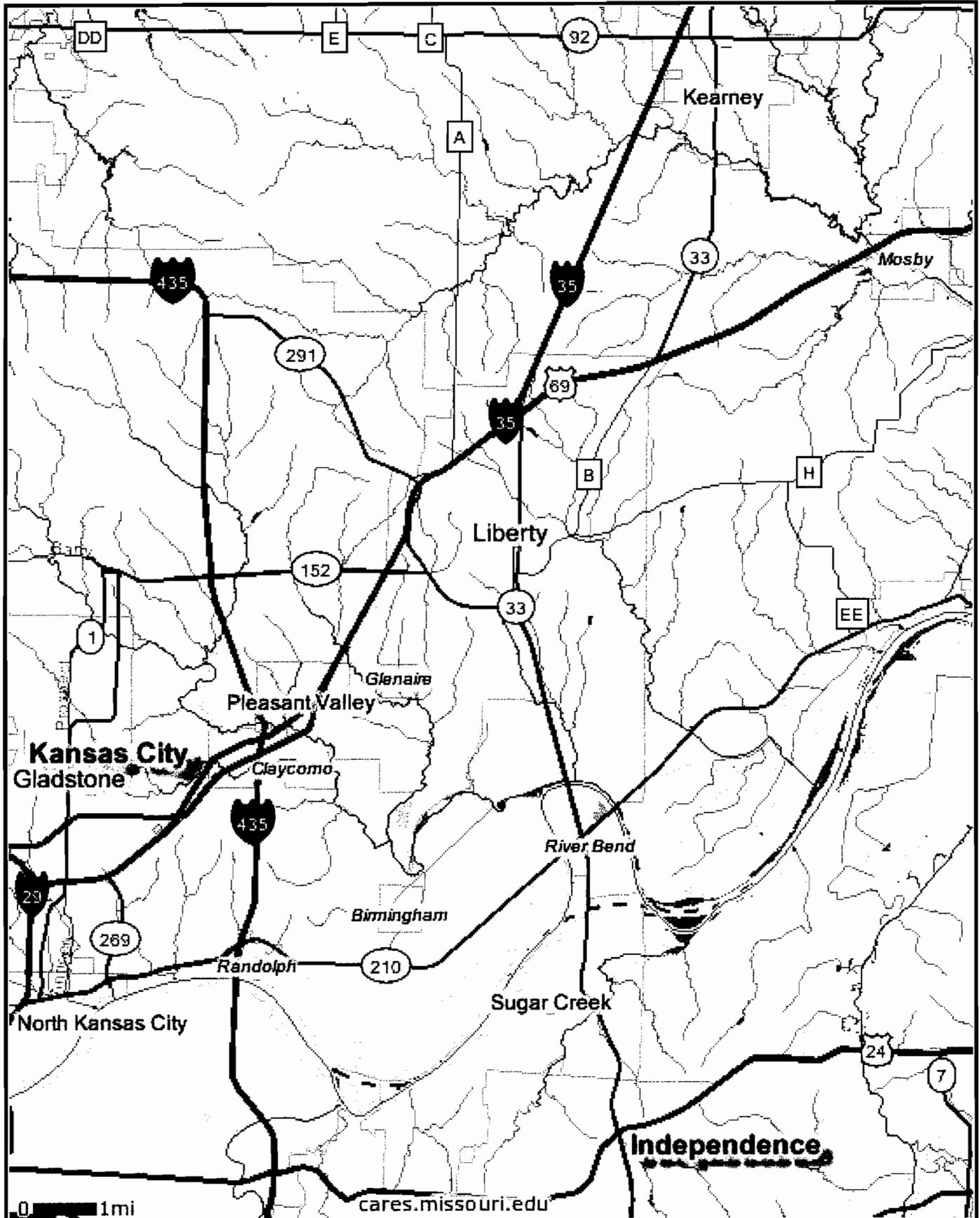
The Permittee is within 100 feet of: Streams and lakes

The Permittee is not within 100 feet of waters classified as major reservoirs.

The Permittee has some area defined as wetlands as identified by the National Wetland Inventory. See attached map.

Stormwater from Liberty does not discharge to a sinkhole.

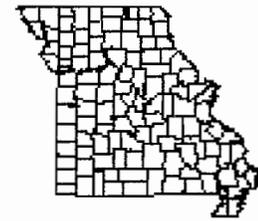
# City of Liberty, MO - Nat'l Wetland Inv.



## Legend

## Locator Map

- Roads and Highways**
-  Interstate
  -  U.S. Highway
  -  State Numbered Highway
  -  State Lettered Highway
  -  Principal Road
-  **County Boundaries**
- NHD Rivers and Streams**
-  Perennial Stream/River
  -  Intermittent Stream/River
  -  Canal or Ditch
  -  Artificial Path (Approx. Centerline)
  -  Other Hydrologic Feature
- Incorporated Areas**
-  City
  -  Town
  -  Village
  -  Census Designated Place
  -  Other
- National Wetlands Inventory**
-  Inland Aquatic Bed
  -  Inland Forested Wetland
  -  Inland Herbaceous Wetland
  -  Inland Shrub Swamp
  -  Lower Perennial River
  -  Upper Perennial River
  -  Intermittent River
  -  Lake (Shallow)
  -  Lake (Deep)
  -  Pond
  -  Pond (Drawdown)
  -  Other Vegetated Wetland



Map prepared by:  
<http://cares.missouri.edu>,  
10/5/2007

**PART II  
MINIMUM  
CONTROL  
MEASURES**

## **1. Public Education and Outreach**

### **1.1 Regulatory Requirement**

**40 CFR 122.34 (b)(1) – Implement a public education program to distribute educational materials to the community of contact, equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps the public can take to reduce pollutants in storm water runoff.**

### **1.2 Target pollutants**

The following is a prioritized list of the leading pollutants, experienced in the permitted area, that are carried by stormwater runoff into water bodies:

1. Suspended solids
2. Oil and grease
3. Pesticides/Herbicides
4. Bacteria/Nutrients/Oxygen-depleting substances
5. Habitat alterations
6. Salinity (salt)

### **1.3 Target audiences**

During the development of the proposed education program, Liberty 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. Children
5. Elected Officials
6. City Staff

### **1.4 Current Programs**

The City of Liberty provides public education to residents through participation in MARC's water quality program. Locally, information is also distributed via the City web site, articles on the City's electronic listserv, handouts at City Hall, information in the Annual (Drinking) Water Quality Report and through the newspaper.

## **1.5 Selected BMPs for Public Education and Outreach**

1.5.1 Participate in the Mid-America Regional Council's (MARC) water quality public education programs and integrate them into the City's local SWMP.

The City of Liberty will continue the utilization of the MARC water quality programs for implementation as part of this Storm Water Management Program. This BMP will allow the City to continue leveraging their membership in MARC to better meet their SWMP goals. It will be integrated into the local program by posting information on the City web site, making the various informational materials available at City Hall and Community Center (possibly rotating them seasonally), press releases to local media outlets and distribution of informational materials as opportunities arise. Included with the materials will be information about how the public can get involved with the stormwater program. This is further discussed in Section 2.

The measurable goals for implementation of this BMP include:

- Create a stand alone Stormwater Quality information page on the City web site with links to MARC information by 3/10/08; to be checked and updated quarterly
- Replenish informational materials at City Hall and the Community Center quarterly; possibly rotate seasonally
- Issue press releases at least twice/year

In addition to these more local efforts, MARC will be doing substantial numbers of radio PSAs, educational displays at community events, giving away items with a NPS pollution reduction message, host workshops and training seminars for businesses and homeowners and provide extensive educational resources via their web site. MARC also performs a water quality attitude survey approximately every other year which provides "measurement" of changes in the metro area. The City of Liberty will review the results of previous and future surveys to evaluate the progress of this BMP.

### **1.5.2 Public presentations**

The City of Liberty has selected public presentations for implementation as part of this Storm Water Management Program. This will allow the message to be tailored to specific audiences. It will be integrated into the program through coordination with various schools, civic organizations, service clubs and other opportunities as they arise.

The measurable goal for implementation of public presentations is to develop "canned" presentations for both child and adult audiences in the first year and to provide a presentation at least twice a year for each of the five years.

### 1.5.3 Public Access Television (Channel 2)

The City of Liberty has selected posting information on the public access television station for implementation as part of this Storm Water Management Program. This will allow messages to get out to a wider variety and potentially larger volume of people.

The measurable goal for implementation of this BMP is to post information to the cable channel at least twice a year. Staff may tailor messages to tie into different education and outreach activities.

### 1.5.4 Utility Bill Announcements

The City of Liberty has selected using utility bill announcements for implementation as part of this Storm Water Management Program. This will allow messages to get out to a wider variety and larger volume of people.

The measurable goal for implementation of this BMP is to include information with utility bills at least twice a year. Staff may tailor messages to tie into different education and outreach activities.

### 1.5.5 Electronic Listserv

The City of Liberty has selected using the electronic listserv for implementation as part of this Storm Water Management Program. This will allow messages to get out to a wider variety and larger volume of people.

The measurable goal for implementation of this BMP is to include NPS pollution prevention information in the electronic newsletter at least twice a year. Staff may tailor messages to tie into different education and outreach activities.

### 1.5.6 Household Hazardous Waste program

The City of Liberty has selected continuing the household hazardous waste collection program for implementation as part of this Storm Water Management Program. HHW is collected in Liberty biannually and in other dropoff locations around the Kansas City metro area on a regular basis.

The measurable goal for implementation of this BMP is to widely advertise and promote this existing program locally through the web site, listserv, press releases, brochures, etc.

### 1.5.7 Water Quality Annual Report

The City of Liberty has selected using the drinking water quality annual report to distribute information about NPS pollution reduction for implementation as part of this Storm Water Management Program. This will allow messages to get out to a wider variety and larger volume of people.

The measurable goal for implementation of this BMP is to include at least one article (including links to web resources) in the water quality annual report.

#### 1.5.8 Dog Waste Disposal Program

The City of Liberty has selected using a dog waste disposal program as part of this Storm Water Management Program. Currently there are ~~xx~~4 dog waste stations with associated educational signage in Liberty's parks system.

The measurable goal for this BMP is to continue to maintain these stations for the public's education and use. This also relates to MCM #2.

## **2. Public Involvement in Storm Water Management Program Development**

### **2.1 Regulatory Requirement**

**40 CFR 122.34 (b)(2) -At a minimum, comply with state, tribal, and local public notice requirements when implementing a public involvement/participation program. EPA recommends that the public be included in developing, implementing, and reviewing your storm water management program and that the public participation process should make efforts to reach out and engage all economic and ethnic groups.**

### **2.2 Current Programs**

Currently, the City of Liberty invites public participation and input through the city web site, regular planning and zoning hearings and regular city council meetings. All standard state and local public notice requirements are followed for the meetings.

### **2.3 Selected BMPs for Public Involvement**

The City of Liberty will comply with state and local public notice requirements when implementing the public involvement/participation program. The public will be included in reviewing and implementing the storm water management program. Specific BMPs for this measure include:

2.3.1 Encourage local public participation in the Mid-America Regional Council's (MARC) water quality programs.

The City of Liberty has selected encouragement of local public participation in the MARC water quality programs for implementation as part of this Storm Water Management Program. This BMP will allow the City to leverage their membership in MARC to better meet their SWMP goals. Information on activities citizens and businesses can participate in through the MARC program will be disseminated through the channels described in Section 1.4.

The measurable goal for implementation of this BMP is to have information about participation in MARC sponsored programs available at City Hall, the Library, and on the web site while directing the public to this information through press releases and utility bill announcements. See Section 1.4 for details.

### 2.3.2 Invite public input through existing mechanisms

City of Liberty has selected inviting public input through existing mechanisms for implementation as part of this Storm Water Management Program. This BMP allows public involvement and participation to be integrated into existing activities through the addition of a regular agenda item to the City Council meetings and discussion of development and redevelopment issues as they relate to stormwater at the Planning and Zoning hearings. Also, the existing City web site has a Citizen Input page. This will be expanded to allow for receipt of stormwater quality related issues as well as advertising a phone number where additional reporting can be made. A brief description of the type of information sought will be provided.

The measurable goals for implementation of this BMP are to:

- Have at least four City Council meetings where public input on stormwater issues is an agenda item each year
- Have at least two Planning and Zoning hearings where stormwater issues are discussed each year
- To expand the Citizen Input web page by 12/31/08 to include stormwater quality related issues and advertise additional methods of citizen input
- Discuss stormwater issues at Mayor's forum meetings annually

### 2.3.3 Work with community groups to perform stormwater quality related activities.

City of Liberty has selected working with community groups to perform stormwater quality related activities for implementation as part of this Storm Water Management Program. This BMP allows for direct public involvement and participation.

The measurable goals for implementation of this BMP are to:

- Develop a contact list for local community groups by 12/31/08 and update it annually
- Reach out to community groups about activities annually (either through speaking engagements or mailings)
- Sponsor at least two stormwater quality activities (possibly storm drain marking or stream clean up) each year

### 2.3.4 Receipt of information from the public

City of Liberty has selected receipt of information from the public for implementation as part of this Storm Water Management Program. This includes information collected on the City's "Fix It" web form, phone calls, letters or walk-in verbal information.

The measurable goal for implementation of this BMP is to develop policies and procedures for receipt of this information by 6/1/08 and document annually the number of inquiries, comments and concerns reported.

#### 2.3.5 Public attitude survey

MARC performs a public attitude survey throughout the Kansas City metropolitan area approximately biannually. The City of Liberty will review the results of these surveys as they are available as part of this Storm Water Management Program.

### **3. Illicit Discharge Detection and Elimination**

#### **3.1 Regulatory Requirement**

**40 CFR 122.34 (b)(3) -Develop, implement, and enforce a program to detect and eliminate illicit discharges into your small MS4. Develop a storm sewer system map, showing the location of all outfalls and the names and locations of all water of the U.S. that receive discharges from those outfalls. To the extent allowable under state, tribal or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions. Develop and implement a plan to detect and address non-storm water discharges including illegal dumping to your system. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Address categories listed in 122.34(b)(3)(D)(iii) if you determine they are significant contributors of pollutants to MS4.**

#### **3.2 Current Programs**

The City of Liberty prohibits the discharge of any dust, dirt, leaves, limbs or any refuse matter into sidewalks, streets, alleys and public ways. As most of these are assumed to be connected to the storm drainage system, the current ordinance minimally addresses some illicit discharge.

#### **3.3 Selected BMPs for Illicit Discharge Detection and Elimination**

##### **3.3.1 Storm Sewer Map/Aerial Photography**

The City of Liberty has developed a storm sewer system map, showing the location of all outfalls and the names and locations of all water of the U.S. that receive discharges from those outfalls. This map is GIS-based and integrates additional GIS data such as aerial photography, contour data, etc.

The measurable goal is to review and update the system map annually. It is expected that the aerial photography will be updated at least once during the permit cycle.

##### **3.3.2 Illicit Discharge Ordinance**

The City of Liberty has developed an ordinance to effectively prohibit non-storm water discharges into the storm sewer system which will be

submitted to the City Council for passage prior to the end of the 2003-2008 permit cycle.

The measurable goal for implementation of this BMP is to have the ordinance passed by 3/10/08 and to document policies and procedures needed to implement the ordinance by 12/31/08. The ongoing goal will be to document any receipt of information from the public, investigations and/or enforcement actions that take place pursuant to this ordinance and report on them annually. The City will also annually review the effectiveness of this ordinance to determine if any changes are needed.

### 3.3.3 Program to Detect and Address Illicit Discharges

The City of Liberty will develop a program to detect and address non-storm water discharges including illegal dumping into the storm sewer system. The City of Liberty will evaluate program requirements and resource needs. Additionally, it will amend the web page to include receipt of stormwater quality related issues including illegal dumping.

The measurable goal for implementation of this program is to evaluate the program requirements and resource/training needs by 6/1/08. Additional resources and training will be acquired and the program implementation will begin by 12/31/08. A GIS project identifying "major outfalls" will be completed by 3/10/08 and will be reviewed annually for accuracy. The City will visually screen all major outfalls at least once per permit cycle and complete follow up testing and/or monitoring as deemed necessary. City staff will continue their existing practice of performing informal inspections of the storm drainage system as regular maintenance duties are carried out.

### 3.3.4 Public Education on Illegal Discharges and Improper Disposal

The City of Liberty will develop a public education effort to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. (This BMP also addresses the minimum control measure for public education.)

The City of Liberty will acquire public education materials and will distribute them to the appropriate target audiences. City employees will be given specific instructions on how report signs of illicit discharge. See Section 1.4 for additional details.

### 3.3.5 Investigate cross-connection of sanitary and storm sewer systems

The City of Liberty will continue to investigate cross-connection of the sanitary and storm sewer systems through smoke testing and CCTV inspection.

The City of Liberty will develop a prioritization for investigation for cross-connections in conjunction with the wastewater program utilizing all the resources available for inspection.

### 3.3.6 Continue Household Hazardous Waste (HHW) Collection Program

The City of Liberty will continue to encourage its citizens to participate in the HHW collection program. This program currently allows for local dropoff biannually, but citizens may also drive to other communities within the Kansas City metro area and dropoff at a variety of times. The public education program will further advertise these options for proper disposal of HHW.

The City of Liberty will document the collection activities and report annually as applicable. This is an existing program and will continue to be ongoing.

### 3.3.7 Storm drain marking program

The City of Liberty will continue its requirement of stamping concrete for new inlets with "No Dumping - Drains to Stream" as part of their standard details. The City will also work with community groups to install pre-fabricated markers stating same on existing inlets.

This is an ongoing program. The number of new inlets with the stamp and markers installed on existing inlets will be reported on annually.

### 3.3.8 Receipt of information from the public

See Section 2.3.4

## **4. Construction Site Storm Water Controls**

### **4.1 Regulatory Requirement**

**40 CFR 122.34 (b)(4) -Develop, implement and enforce a program to reduce pollutants in any storm water runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Program must include: the development and implementation of (at a minimum) and ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, requirements for construction site operators to implement appropriated erosion and sediment control BMPs, requirements for construction site operators to control waste at the construction site, procedures for site plan review which incorporate consideration of potential water quality impacts, procedures for receipt and consideration of information submitted by the public.**

### **4.2 Current Programs**

Currently, the City of Liberty has adopted APWA standards for erosion and sediment control design, performs plan review, performs regular inspections of construction sites and holds stop work order power.

### **4.3 Selected BMPs for Construction Site Storm Water Controls**

#### **4.3.1 Implement changes to Development Ordinances to Better Address Construction Site Runoff Controls**

The City of Liberty has drafted amendments to the development (and redevelopment) related ordinances and APWA standards to require better stormwater pollution prevention at construction sites that disturb more than one acre, as well as tighten sanctions to comply with the requirements, as part of this Storm Water Management Program. The ordinance modifications and associated requirements or procedures will require construction site operators to implement appropriate erosion and sediment controls and to control wastes at construction sites. City of Liberty procedures will be modified to address these requirements. It will be integrated into the existing plan review process.

The measurable goal for implementation is to get these amendments passed prior to 3/10/08, review the existing policies and procedures relating to these ordinances, determine what modifications are necessary

and implement needed changes by 12/31/08. These should be reviewed once per general permit cycle.

#### 4.3.2 Public Education on Construction Site Storm Water Control Requirements

The City will have a component of their general public education program to inform the public about construction site runoff control. (This BMP also addresses the minimum control measure for public education.)

The City of Liberty will acquire public education materials and distribute them according to goals set forth in Section 1.4. Target audiences will include developers and contractors. Also, City staff will be trained in proper inspection for erosion and sediment control. This may be accomplished through in-house "brown bag" seminars or through sending key personnel to training like that hosted by the International Erosion Control Association (IECA). It could also be incorporated into their safety programs.

#### 4.3.3 Receive public input on proposed and current construction projects

City of Liberty has selected receiving public input for implementation as part of this Storm Water Management Program. This BMP coordinates with MCM #2 and can be integrated into existing activities through receipt of information from the public at the existing Planning and Zoning hearings and City Council meetings. Additional input can be received less formally through the City web site and at the designated phone number and mailing address.

The measurable goal for implementation of receiving public input on proposed and current construction projects is to log the receipt of this information, respond within 1 business day where applicable and to document any complaint inspection or enforcement actions taken.

#### 4.3.4 Add design criteria, standard details and specifications for BMPs to City standards

City of Liberty has selected adding design criteria, standard details and specifications for BMPs to City standards for implementation as part of this Storm Water Management Program. Some of this goal is already met through the use of the APWA standards, but additional information may need to be developed in order for specific water quality objectives to be met.

The measurable goal for implementation of this BMP is to complete the review of existing design criteria, standard details and specifications as they relate to stormwater best management practices by 12/31/08. These should be reviewed annually to ensure that any new technologies or practices are included.

#### 4.3.5 Sample ESC plans for residential construction

City of Liberty has selected sample ESC plans for residential construction for implementation as part of this Storm Water Management Program. The City will use the documents prepared by the APWA and will work with residential contractors to ensure the BMPs are installed properly.

The measurable goal for implementation is to document that sample plans are readily available to all residential contractors and to document any other assistance provided to this target audience in achieving better construction site runoff control.

#### 4.3.6 Construction plan review

City of Liberty has selected construction plan review for implementation as part of this Storm Water Management Program.

The measurable goal for implementation of construction plan review for new and re-development projects disturbing more than one acre is to complete these reviews in a timely manner ensuring that selected BMPs are appropriate for the site. This is an ongoing program. The number of plans reviewed will be documented annually.

## **5. Post Construction Storm Water Management for New Development/ Redevelopment**

### **5.1 Regulatory Requirement**

**40 CFR 122.34 (b)(5) –Develop, implement and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects that are less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community. Use an ordinance or other regulatory mechanism to address post-construction runoff. Ensure adequate long-term operation and maintenance of BMPs.**

### **5.2 Current Programs**

Currently, the City of Liberty has requirements related to detention, stream buffers, open space, and minimization of disturbance to soil/vegetation in Conservation Subdivisions. The City also has a Stormwater Master Plan and a City Comprehensive Plan that give direction to growth.

### **5.3 Selected BMPs for Post Construction Storm Water Management for New Development/Redevelopment**

#### **5.3.1 Detention Requirements**

The City of Liberty will continue and annually re-evaluate the effectiveness of their detention requirements. The City will consider modifications to the existing ordinance to better address more frequent storms to control discharges known to stress natural stream systems.

#### **5.3.2 Stream Buffer Requirements**

The City of Liberty will continue and annually re-evaluate the effectiveness of their stream buffer requirements. The City has drafted some language to provide clarification to the current ordinance that is expected to be passed by 3/10/08.

#### **5.3.3 Open Space Requirements**

The City of Liberty will continue and annually re-evaluate the effectiveness of their open space requirements. Planning staff will be integrally involved with the decision-making process.

#### 5.3.4 Wetland Protection

The City of Liberty will evaluate any current requirements for wetland protection in the Unified Development Ordinance (UDO) and will look for opportunities to improve the protection of these areas.

#### 5.3.5 Conservation Subdivision

The City will continue to use the Conservation Subdivision as a mechanism to allow flexibility in design for better stormwater quality and quantity management. The City will annually evaluate the effectiveness of this option for developers.

#### 5.3.6 Stormwater Master Plan

The City's Stormwater Master Plan will be reviewed each permit cycle to verify it reflects current water quality policies and goals.

#### 5.3.7 City Comprehensive Plan

The City's Comprehensive Plan will be reviewed each permit cycle to verify it reflects current water quality policies and goals.

#### 5.3.8 Unified Development Ordinance (UDO)

The City of Liberty will continue and annually re-evaluate the effectiveness of various development requirements in the UDO. Specifically, the existing parking requirements will be reviewed to determine if there are any opportunities to decrease impervious area by 12/31/08. Other development codes may be reviewed for ways to create incentives for developers to use Low Impact Development or other measures to further protect water quality.

#### 5.3.9 Ensure ongoing effectiveness of existing and future post-construction structural BMPs

City of Liberty has selected ensuring effectiveness of existing and future post-construction structural BMPs for implementation as part of this Storm Water Management Program. The City has drafted a modification to the code to more specifically place requirements on long term BMP operation and maintenance that is expected to be passed by 3/10/08.

The measurable goals for implementation of this BMP are to:

- Complete an inventory of post-construction structural BMPs by 12/31/08 and update annually
- Verify ownership and maintenance responsibility for each BMP
- Perform outreach to owners to educate them on requirements (also credited to MCM #1)

- Perform annual inspections of these facilities documenting any enforcement actions annually.

Note that it is expected that most current facilities are privately owned.

## **6. Pollution Prevention/Good Housekeeping for Municipal Operations**

### **6.1 Regulatory Requirement**

**40 CFR 122.34 (b)(6) Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.**

### **6.2 Current Programs**

Currently, the City of Liberty:

- Performs nearly all fleet maintenance including washing and minor service/repair under cover
- Has maintenance schedules for City vehicles and equipment
- Keeps road salt stored under cover
- Recycles their waste oil through a commercial pickup service or through distribution to local businesses with waste oil heaters
- Picks up litter from the right-of-way
- Sweeps all streets at least twice a year with closer to monthly for streets in the business district
- Is responsible for cleaning the parking lots at City Hall and the Community Center
- Requires stormwater pollution prevention measures in all construction projects disturbing greater than one acre
- Has the City's swimming pool discharging to the sanitary sewer
- Uses smoke testing and CCTV inspection of sanitary sewers to identify cross-connection and potential for illicit discharge
- Maintains four dog waste stations throughout the Parks system

### **6.3 Selected BMPs for Municipal Operations**

#### **6.3.1 Employee training**

The City of Liberty would like to maximize its pollution prevention related to its current activities especially in regards to fleet maintenance, facilities and parks maintenance, construction activities, road maintenance, etc. Policies and procedures will be documented and expanded wherever necessary. Staff training may be accomplished through incorporating stormwater quality topics into the monthly safety meeting, distribution of newsletters, workshops, informational brochures, etc. See Section 1.4 for further details.

The measurable goal for implementation of this BMP is to develop a list of training topics and complete training on at least four of those topics each permit year.

### 6.3.2 Parks Department

The City of Liberty will review the Parks Department operation and maintenance activities and develop, publish and distribute policies and procedures for implementation as part of this Storm Water Management Program. This BMP will assist with the education of employees on expectations for Good Housekeeping in Municipal Operations as it relates to the Parks Department.

The measurable goal for implementation of this BMP is to evaluate all areas of Parks operations and maintenance for potential water quality impacts, draft policies and procedures for each of these areas, obtain input/buyin on the draft document from affected employees, publish and distribute final documentation by 12/31/08.

### 6.3.3 Spill Prevention and Response

The City of Liberty will review the current policies and procedures for spill prevention and response by 12/31/08. Staff will identify areas where potential pollutants are stored and make recommendations for improvements. If necessary, policies and procedures may be developed, published and distributed part of this Storm Water Management Program. This BMP will assist with the education of employees on expectations for Good Housekeeping in Municipal Operations as it relates to the spill prevention and response.

The measurable goal for implementation of this BMP is to evaluate all areas of municipal operations for potential spills and make recommendations by 12/31/08.

### 6.3.4 Catch Basin Cleaning

The City of Liberty has selected catch basin cleaning for implementation as part of this Storm Water Management Program. The measurable goal will be to inspect 20% of catch basins annually and clean as required.

### 6.3.5 Ongoing programs

The City of Liberty will continue and expand where pertinent ongoing municipal programs that impact water quality as part of their implementation of this Storm Water Management Program.

See Section 6.2 for the list of ongoing programs. By their nature these activities are ongoing and follow established schedules. However, documentation of any possible metrics shall be completed regularly and reported on annually.

## **7. General Rationale**

### ***7.1 Decision Process***

Liberty reviewed the General Permit requirements and selected each of the BMPs after reviewing research from notable sources such as the EPA and the Center for Watershed Protection. Programs from other communities were also examined. Various BMPs were selected based on the evidence that they will have a positive impact on targeted pollutants. City staff also examined each BMP for how it could fit into existing activities and mechanisms. The SWMP will be made available for public inspection and comment upon completion.

### ***7.2 Responsible Person***

The person responsible for the overall management and implementation of the permittee's stormwater management program is the City Engineer. Others will be involved in the execution of each of the individual activities in the program.

### ***7.3 Evaluation***

The City of Liberty will report annually on the level of achievement toward all measurable goals. Where applicable, metrics will be documented. Qualitative anecdotal evidence will also be documented where possible. Additionally, MARC performs a biannual water quality survey that is funded through their water quality program membership that can serve as a measurement in the change of the public's attitudes and behaviors.