STORM WATER MANAGEMENT PLAN

2026-2031

Permit Number: UTR090111

For questions or comments about this plan, please contact either of the following:

Robert Markle *Deputy Public Works Director/City Engineer:* (801) 576-6360

Colton Konesky *Draper City Storm Water Specialist*: (801) 576-6331

Delegation of Authority

Utah Department of Environmental Quality
Division of Water Quality
195 North 1950 West
DEQ 3rd Floor
Salt Lake City, Utah 84116

Dear Executive Director:

As the principal executive officer (or ranking elected official) of Draper City, I hereby authorize Robert Markle, acting as the Draper Deputy City Engineer/ Deputy City Public Works Director, to act on my behalf relative to documents, reports, notices or activities pertaining to our City's Small MS4 UPDES Stormwater Discharge Permit.

Respectfully Submitted,

Name: _____

Signature: _____

Title: _____

Date: _____

Certification Statement

"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."

Name: _____

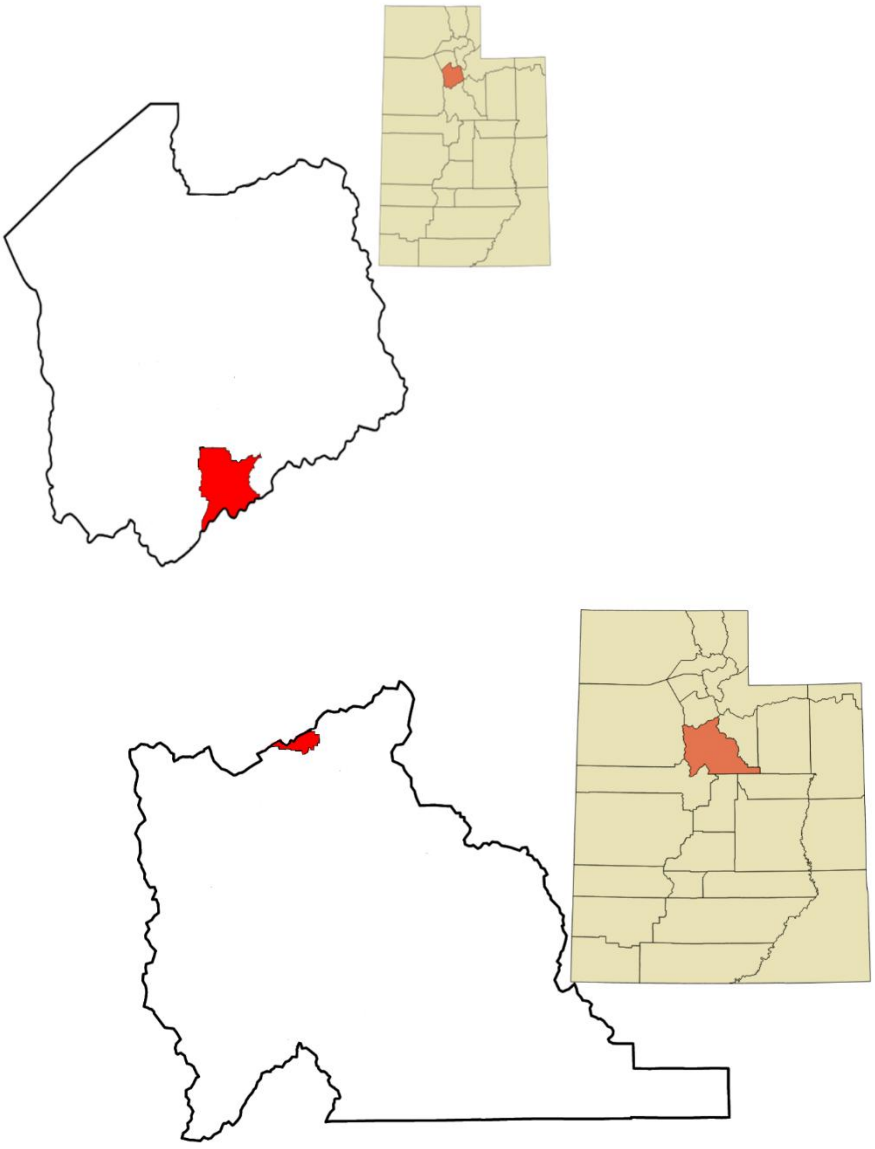
Signature: _____

Title: _____

Date: _____

Draper City MS4 General Location

Located at the southeastern corner of the Salt Lake County urban corridor, with a southern portion extending into northern Utah County



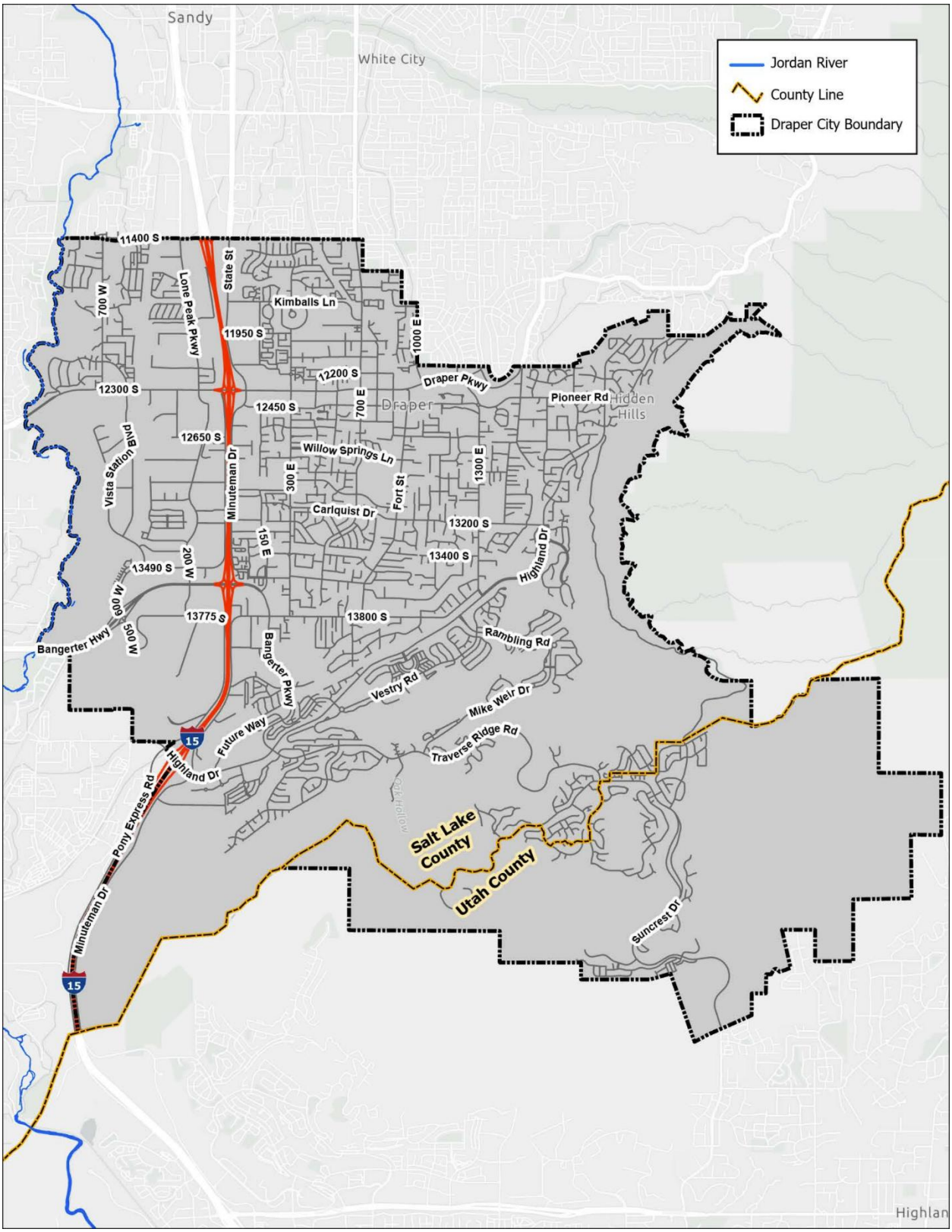

Sandy
White City
Jordan River
County Line
Draper City Boundary
11400 S
State St
700 W
Lone Peak Pkwy
Kimballs Ln
11950 S
1000 E
12200 S
Draper Pkwy
12300 S
12450 S
700 E
Draper
Pioneer Rd
Hidden Hills
12650 S
Willow Springs Ln
Vista Station Blvd
Minuteman Dr
300 E
1300 E
Fort St
Carlquist Dr
13200 S
150 E
200 W
13490 S
13400 S
Highland Dr
600 W
500 W
13775 S
13800 S
Bangerter Hwy
Rambling Rd
Bangerter Pkwy
Vestry Rd
Mike Weir Dr
Future Way
Traverse Ridge Rd
15
Highland Dr
Pony Express Rd
Salt Lake County
Utah County
Minuteman Dr
Suncrest Dr
15
Highlan

Table of Contents

DEFINITIONS 8
INTRODUCTION 12
History 12
Regulations 13
Urbanization 13
Purpose 14
ROLES AND RESPONSIBILITIES 15
4.1.3.2. BMP Implementation and Coordination 15
4.1.3.3. Positions, Offices, Departments, and Other Entities 15
4.1.3.4. Agreements, Contracts, or MOUs 15
SPECIAL CONDITIONS 19
3.1. Discharges to Impaired Waters 19
3.2. Jordan River E. coli TMDL Compliance Plan 22
3.3 Nitrogen and Phosphorus Reduction 23
MINIMUM CONTROL MEASURES (MCMs) 24
MCM 1 – PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS 25
4.2.1.1. Targeted Pollutants and Pollutant Sources 25
4.2.1.2.(1.) General Public 26
4.2.1.3.(1.) Institutions, Industrial, and Commercial Facilities 26
4.2.1.4. Construction Engineers, Contractors, Developers, Development Review Staff, and Land Use Planners 27
4.1.3.(1.) Best Management Practices 28
4.1.2. Ongoing Documentation 30
MCM 2 – PUBLIC INVOLVEMENT/PARTICIPATION 31
4.2.2.1. Public Notification Program or Policy 31
4.2.2.2. SWMP Availability for Public Review 31
4.2.2.3. SWMP Website Availability 31
4.1.3.(1.) Best Management Practices 32
4.1.2. Ongoing Documentation 32
MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION 33
4.2.3.1. MS4 Map 33

4.2.3.2.(1.) Regulatory Mechanism 33
4.2.3.3.(1.-6.) IDDE Plan 34
4.2.3.4.1.(1.-2.) SOPs – Tracing Illicit Discharges 35
4.2.3.4.2. SOPs – Characterizing Illicit Discharges 36
4.2.3.4.3.(1.) SOPs – Ceasing Illicit Discharges 36
4.2.3.4.4. SOPs – Spill and Improper Disposal 37
4.2.3.4.5. Program Evaluation and Assessment 37
4.2.3.5 Records 37
4.2.3.6.(1.-3.) Training 38
4.2.3.7. Requests from the Permitting Authority 38
4.1.3.(1.) Best Management Practices 38
4.1.2. Ongoing Documentation 39
MCM 4 – CONSTRUCTION SITE STORM WATER RUNOFF CONTROL 41
4.2.4.1.(1.-3.) Regulatory Authority 41
4.2.4.2.(1.-2.) Enforcement Strategy 42
4.2.4.3.(1.-3.) Pre-Construction SWPPP Review 43
4.2.4.4.(1., 2., 2.1-.2., and 3.-6.) Construction Site Stormwater Runoff Control Inspection Program ... 44
4.2.4.5 .(1.-3.) Training 47
4.2.4.6. Record Retention 47
4.1.3.(1.) Best Management Practices 47
4.1.2. Ongoing Documentation 52
MCM 5 – POST-CONSTRUCTION STORMWATER MANAGEMENT 53
4.2.5.1.-4. Post-Construction Controls 53
4.2.5.2.(1.-4.) Regulatory Mechanism 54
4.2.5.3.(1.-2.) Plan Review 56
4.2.5.4.(1.-2.1) Inspections 56
4.2.5.5.(1.-2.) Inventory 57
4.2.5.6.(1.-3.) Training 57
4.1.3.(1.) Best Management Practices 58
4.1.2. Ongoing Documentation 64
MCM 6 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS 65
4.2.6.1. Inventory 65
4.2.6.2. Possible Pollutants at Inventoried Facilities 65

4.2.6.3.(1.-2.) Identification of “High Priority” Facilities 66
4.2.6.4.(1.-3.) High Priority Facility Inspections 67
4.2.6.5.(1.-6.) Operations and Maintenance SOPs 68
4.2.6.6. Floor Drain Inventory 70
4.2.6.7. Outside Contracting 70
4.2.6.8.(1.) Flood Management Controls Assessment 71
4.2.6.9. Retrofit Plan 71
4.2.6.10.(1.-3.) Training 71
4.1.3.(1.) Best Management Practices 72
4.1.2. Ongoing Documentation 77

DEFINITIONS

80th Percentile Rainfall Event	Means an event in which the precipitation total is greater than or equal to 80 percent of all storm events over a given period of record. A reliable record of historical precipitation data should meet the following conditions: 1) come from an active rain gage; 2) have at least 30 years of data; and 3) have 90% data coverage for the period of record.
Adequate Compliance History	Applicable only to MCM 4. Means the qualifying construction site has the following characteristics: 1) two (2) consecutive months of oversight inspections which did not result in enforcement, including warnings of enforcement (this may include the inspection prior to land disturbance and the first monthly inspection); 2) no instances of verified complaints; and 3) no observed impacts to waters of the state or the MS4 system.
Beneficial Uses	Uses of waters of the state, which include but are not limited to: domestic, agricultural, industrial, recreational, and other legitimate beneficial uses.
BMP	"Best Management Practice" Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the state. BMPs also include treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.
City Construction Stormwater Inspector	Refers to the Storm Water Specialist or Storm Water Compliance Inspector.
Common Plan of Development	One plan for development or sale, separate parts of which are related by any announcement, piece of documentation (including a sign, public notice or hearing, sales pitch, advertisement, drawing, plat, blueprint, contract, Permit application, zoning request, computer design, etc.), physical demarcation (including contracts) that identify the scope of the project. A plan may still be a common plan of development or sale even if it is taking place in separate stages or phases, is planned in combination with other construction activities, or is implemented by different owners or operators.
Dry Weather Screening	Monitoring done in the absence of storm events to discharges representing, as much as possible, the entire storm drainage system for the purpose of obtaining information about illicit connections and improper dumping.
Groundwater	Water in a saturated zone or stratum beneath the surface of the land or below a surface water body.
Illicit Discharge	Any discharge to the Draper City MS4 that is not composed entirely of stormwater except discharges pursuant to a UPDES Permit (other than the

	UPDES Permit for discharges from the municipal separate storm sewer) to waters of the state.
Impaired Waters	Any segment of surface waters that has been identified by the State as failing to support one or more of its designated uses.
LID	"Low Impact Development" An approach to land development (or re-development) that works with nature to more closely mimic pre-development hydrologic functions. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product.
MS4	"Municipal Separate Storm Sewer System" A conveyance or system of conveyances, including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains that is: 1) Owned by a state, city, town, county, district, association, or public body having jurisdiction over disposal of wastes or stormwater that that discharges to waters of the state; 2) Designed to collect and convey stormwater; 3) Not a combined sewer; and 4) Not a part of a publicly owned treatment works.
Outfall	A point source as defined by UAC R317-8-1.5(34) at the point where a municipal separate storm sewer discharges to waters of the state and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other waters of the state are used to convey waters of the state.
Point Source	Discernable, confined and discrete conveyance, including a pipe, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operating, or vessel of other floating craft, from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture.
Pollutant	Anything that is discharged into water and can harm water quality, such as sediment, nutrients, oil and grease, pathogens, pesticides and herbicides, and trash and debris.
Priority Construction Site	Means a construction site that has potential to threaten water quality when considering the following factors: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-storm water discharges and past record of non-compliance by the operators of the construction site.
Qualifying Construction Site	Means construction sites with a land disturbance of greater than or equal to one acre. This includes projects less than one acre that are part of a larger

	common plan of development or sale which collectively disturbs land greater than or equal to one acre, where common plan of development or sale means one plan for development or sale, separate parts of hearing, sales pitch, advertisement, piece of documentation (including a sign, public notice or hearing, sales pitch, advertisement, drawing, plat, blueprint, contract, permit application, zoning request, computer design, etc.), physical demarcation (including contracts) that identify the scope of the project. A plan may still be a common plan of development or sale even if it is taking place in separate stages or phases, is planned in combination with other construction activities, or is implemented by different owners or operators.
Redevelopment	The replacement or improvement of impervious surfaces on a developed site.
SOP	"Standard Operating Procedure" A set of written instructions that document a routine or repetitive activity.
Stormwater	Water resulting from rain or snowmelt.
Stormwater Infiltration	Stormwater that soaks into the ground.
Stormwater Management Program	A set of measurable goals, actions, and activities—as required in Part 4.2 of the Small MS4 Permit—designed to reduce the discharge of pollutants from Draper City to the maximum extent practicable and to protect water quality.
Stormwater Runoff	Stormwater that flows over land or impervious surfaces, such as paved streets and parking lots, and does not soak into the ground.
SWMP	"Storm Water Management Plan" The written plan that is used to describe the various control measures and activities Draper City will undertake to implement the storm water management program.
TMDL	"Total Maximum Daily Load" Refers to a study that: 1) quantifies the amount of a pollutant in a stream; 2) identifies the sources of the pollutant; and 3) recommends regulatory or other actions that may need to be taken in order for the impaired waterbody to meet water quality standards.
Urbanization	The increasing concentration of human populations in urban areas, leading to the transformation of land for residential, commercial, and other purposes.
Waterbody	Refers to any natural or artificial standing or flowing surface water feature that constitutes a waters of the state, including springs, canals, creeks, streams, ponds, rivers, and lakes. This term does not include storm drains, ditches, detention basins, prefabricated chambers, or similar stormwater facilities designed primarily for stormwater conveyance or management.

Waters of the State	All streams, lakes, ponds, marshes, water-courses, waterways, wells, springs, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface and underground, natural or artificial, public or private, which are contained within, flow through, or border upon this state or any portion thereof, except that bodies of water confined to and retained within the limits of private property, and which do not develop into or constitute a nuisance, or a public health hazard, or a menace to fish and wildlife, shall not be considered to be "waters of the state" under this definition (UAC R317-1-1).

INTRODUCTION

For the purposes of this document, stormwater management refers to the planning, implementation, and enforcement of practices and controls designed to reduce pollution in stormwater runoff within Draper City ("City").

Stormwater management is an important component of the Clean Water Act and plays a role in protecting, maintaining, and restoring the designated beneficial uses of waterbodies. In Utah, waterbodies are classified based on the following beneficial uses:

- Class 1 – Protected for use as a source of drinking water.
- Class 2 – Protected for recreational use and aesthetics.
- Class 3 – Protected for use by aquatic wildlife.
- Class 4 – Protected for agricultural uses including irrigation of crops and stock watering.
- Class 5 – The Great Salt Lake.

Once a waterbody is classified, it is assigned water quality standards, including limits for pollutants necessary to protect its designated beneficial uses. If a waterbody does not meet these standards, it may be listed as an impaired water, and a TMDL may be developed to address the impairment.

Stormwater runoff can transport pollutants from both pervious and impervious surfaces within the City to waterbodies located within or adjacent to the City, potentially affecting the receiving waterbodies' ability to meet water quality standards. Stormwater management helps minimize these impacts by controlling pollutant sources.

The following subsections provide an overview of factors that drive the need for stormwater management, concluding with the purpose of the City's Storm Water Management Program.

History

In the early to mid-19th century, rapid industrialization and urban growth, combined with the absence of water quality regulations in the United States, led to widespread pollution of rivers, lakes, and coastal waters.

In 1948, the Federal Water Pollution Control Act (FWPCA) was enacted as the first major federal law addressing water pollution. However, its initial scope was limited, primarily providing funding for research and technical assistance to states, with limited federal enforcement authority.

In 1969, two major environmental disasters brought national attention to environmental pollution:

- The Cuyahoga River in Ohio caught fire due to oil and industrial pollutants on its surface.
- The Santa Barbara oil spill released millions of gallons of crude oil into the Pacific Ocean.

In 1970, the Environmental Protection Agency (EPA) was established to lead federal environmental protection efforts in response to growing public concern over air and water pollution.

In 1972, the FWPCA was significantly amended and renamed the Clean Water Act (CWA). These amendments established a national objective to restore and maintain the integrity of the nation's waters and created the National Pollutant Discharge Elimination System (NPDES) program to regulate point source discharges to waters of the United States.

In 1987:

- The CWA was further amended to address stormwater runoff as a major source of water pollution that had not previously been comprehensively regulated under the Act. These amendments expanded the existing NPDES program to include stormwater discharges, to be implemented in two phases.
- The State of Utah received authorization from the EPA to administer the NPDES program at the state level, known as the Utah Pollutant Discharge Elimination System (UPDES) program. As a result, stormwater permitting and enforcement in Utah are primarily implemented through the UPDES program.

In 1990, Phase I of the UPDES stormwater program (promulgated by EPA) required operators of "medium" and "large" MS4s, generally those serving populations of 100,000 or greater, to obtain UPDES permit coverage and to develop, implement, and enforce a stormwater management program to control stormwater discharges from these MS4s.

In 1999, Phase II of the UPDES stormwater program (promulgated by EPA) required operators of "small" MS4s, generally those serving populations under 100,000, to obtain UPDES permit coverage and to develop, implement, and enforce a stormwater management program to control stormwater discharges from these MS4s.

Regulations

The Clean Water Act (CWA) is the primary federal law governing water pollution in the United States. Its objective is to restore and maintain the chemical, physical, and biological integrity of the nation's waters.

The Utah Water Quality Act (Utah Code Title 19, Chapter 5) resembles the CWA and grants authority to the Utah Division of Water Quality (DWQ) to implement and enforce water quality programs. This includes issuing permits under the Utah Pollutant Discharge Elimination System (UPDES) program, which functions as the state-level equivalent of the federal National Pollutant Discharge Elimination System.

Under the UPDES program, certain MS4 operators—such as cities and counties—are required to obtain a Notice of Intent and comply with a stormwater discharge permit. This permit requires the development, implementation, and enforcement of a Storm Water Management Program designed to reduce pollutants in stormwater discharges to the maximum extent practicable.

Urbanization

Urbanization fundamentally transforms the natural landscape by replacing pervious surfaces like soil and vegetation with impervious surfaces such as roads, parking lots, sidewalks, and buildings. This conversion reduces or prevents stormwater from infiltrating into the ground and increases the volume of stormwater runoff.

To compensate for the loss of natural infiltration and manage the resulting increase in stormwater runoff, developed areas rely on stormwater infrastructure such as gutters, storm drains, and underground pipes. These systems are designed to expeditiously collect and convey stormwater, with most stormwater eventually being discharged into nearby streams, rivers, or lakes.

Pollutants that are exposed on pervious and impervious surfaces are easily picked up by stormwater runoff and often transported into the Municipal Separate Storm Sewer System (MS4). Because most MS4s are designed to convey—not treat—stormwater, these pollutants are often discharged into nearby streams, rivers, or lakes.

As urban areas expand, impervious surfaces and stormwater infrastructure increase alongside population growth, construction activity, and municipal, industrial, and commercial operations. These factors contribute to greater pollutant generation and increase the likelihood that pollutants will be washed into the MS4 during storm events. Pollutants entering the MS4 and reaching a waterbody can impair the beneficial uses of the receiving waterbody.

Purpose

This SWMP:

- Is developed to fulfill the requirements of the UPDES Small MS4 General Permit. By implementing the six MCMs, including all applicable special conditions, Draper City is likely to reduce pollutant discharges from its MS4 to the maximum extent practicable.
- Displays permit requirements and the MCM objectives to enhance public understanding and encourage public input.
- Is a living document that will be updated as needed to reflect permit requirements, relevant ordinance changes, guidance from DWQ, and ongoing efforts to improve Draper City's stormwater management practices.

ROLES AND RESPONSIBILITIES

4.1.3.2. BMP Implementation and Coordination

The individual(s) responsible for implementing or coordinating the BMPs contained within the SWMP:

Storm Water Specialist

- Name: Colton Konesky

Deputy Public Works Director / City Engineer

- Name: Robert Markle

4.1.3.3. Positions, Offices, Departments, and Other Entities

The positions, departments, divisions, and other entities responsible for implementing the BMPs contained within the SWMP:

Minimum Control Measure (MCM)	Responsible Departments and Other Entities
MCM 1 - Public Education and Outreach on Storm Water Impacts	• Public Works – Engineering Division
MCM 2 - Public Involvement/Participation	• Public Works – Engineering Division
MCM 3 - Illicit Discharge Detection and Elimination (IDDE)	1) Reporting Elements: • All Departments; • Salt Lake County Health Department 2) All Other Elements of IDDE: • Public Works – Engineering, Storm Water, and Streets Divisions; • Community Development – Code Enforcement; • Salt Lake County Health Department
MCM 4 - Construction Site Storm Water Runoff Control	• Public Works – Engineering Division;
MCM 5 - Long-Term Storm Water Management in New Development and Redevelopment	• Public Works – Engineering Division; • Community Development
MCM 6 - Pollution Prevention and Good Housekeeping for Municipal Operations	• Public Works – Engineering, Fleet, Storm Water, and Streets Divisions; • Parks & Recreation – Parks Division

4.1.3.4. Agreements, Contracts, or MOUs

A Memorandum of Understanding (MOU) exists between Salt Lake County, on behalf of its Salt Lake County Health Department, and Draper City. This MOU pertains to the IDDE minimum control measure and describes each party's responsibilities and overall coordination.

Position / Office	Responsibilities
City Manager *(Principal Executive Officer)*	• Sign UPDES permit applications
Deputy Public Works Director / City Engineer *(Duly Authorized Representative of the Principal Executive Officer)*	• Review SWMP updates • Review Storm Water Management Program SOP developments and updates • Sign all reports required by the UPDES MS4 permit and other information requested by the permitting authority • Support the implementation and coordination of Storm Water Management Program SOPs and BMPs

Storm Water Specialist *(A position within the Public Works – Engineering Division)*	• Review and revise the SWMP based on evaluation findings and/or permit changes
	• Develop and/or update Storm Water Management Program SOPs and BMPs as needed
	• Maintain documentation of Storm Water Management Program activities
	• Prepare Storm Water Management Program annual reports
	• Implement and coordinate Storm Water Management Program SOPs and BMPs, including:
	  ○ Minimum Control Measure (MCM) 1 coordination with:
	  ▪ Communications
	  ▪ Public Works
	  ▪ Parks & Recreation
	  ○ MCM 2 coordination with:
	  ▪ Communications
	  ▪ GIS
	  ○ MCM 3 coordination with:
	  ▪ Code Enforcement Officer
	  ▪ Communications
	  ▪ Community Development – Building
	  ▪ Fire
	  ▪ GIS
	  ▪ Human Resources
	  ▪ Parks & Recreation – Parks
	  ▪ Police
	  ▪ Public Works
	  ▪ Salt Lake County Health Department

	○ MCM 4 coordination with: ▪ Storm Water Compliance Inspector ▪ GIS ▪ Public works – Engineering ○ MCM 5 coordination with: ▪ Community Development – Planning ▪ Public Works – Engineering ○ MCM 6 coordination with: ▪ Community Events ▪ Fire ▪ GIS ▪ Parks & Recreation ▪ Police ▪ Public Works
Storm Water Compliance Inspector	• Implement specific MCM 3 SOPs and requirements • Implement specific MCM 4 SOPs, requirements, and BMPs
Code Enforcement Officer	• Implement specific MCM 3 SOPs and requirements
Community Events	• Implement or support implementation of a specific MCM 6 SOP requirement
Communications	• Support implementation of specific MCM 1 requirements and BMPs • Support implementation of specific MCM 2 requirements and BMPs • Support implementation of specific MCM 3 requirements and BMPs
Community Development – Building	• Implement specific MCM 3 SOPs and requirements
Community Development – Planning	• Implement specific MCM 5 requirements
Fire	• Implement specific MCM 3 SOPs and requirements • Support continued development of a specific MCM 6 SOP
GIS	• Support implementation of specific MCM 2 BMPs • Support implementation of specific MCM 3 SOPs and requirements • Support implementation of specific MCM 4 requirements • Support implementation of specific MCM 6 requirements

Human Resources	• Support implementation of specific MCM 3 requirements and BMPs
Parks & Recreation – Parks	• Implement specific MCM 1 BMPs • Implement specific MCM 3 SOPs and requirements • Implement specific MCM 6 SOPs and requirements
Police	• Implement specific MCM 3 SOPs and requirements • Implement a specific MCM 6 SOP
Public Works – Engineering	• Support implementation of a specific MCM 1 requirement • Implement specific MCM 3 SOPs and requirements • Implement specific MCM 5 requirements
Public Works – Fleet	• Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements
Public Works – Storm Water	• Support implementation of a specific MCM 1 BMP • Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements
Public Works – Streets	• Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements
Public Works – Water	• Implement specific MCM 3 SOPs and requirements • Implement and support implementation of specific MCM 6 SOPs and requirements

SPECIAL CONDITIONS

In addition to the six minimum control measures required under the Small MS4 Permit, supplemental conditions apply where impaired waters have been identified. These conditions are intended to address local waterbody impairments by targeting pollutant sources contributing to the impairment and prioritizing efforts that support the restoration of the affected waterbodies.

3.1. Discharges to Impaired Waters

Requirement(s):

- Determine whether stormwater discharge from any part of the MS4 contributes to a 303(d) listed waterbody; If so, include a description of how the discharge of pollutants of concern into the impaired waterbody will be controlled
- Determine whether a TMDL for the 303(d) listed waterbody has been developed and approved by the EPA;
- Review the 303(d) list biennially after DWQ's Integrated Report is released and determine whether additional impairments to the receiving water were identified during the previous Integrated Report cycle;
- Update the SWMP within 180 days of the release of the Integrated Report, as needed, to address newly added impairments.

Does stormwater discharge from any part of the Draper City MS4 contribute to a 303(d) listed (i.e., impaired) waterbody? ☒ Yes ☐ No

Jordan River-6

The Jordan River-6 Assessment Unit (AU) extends from 7800 South to Bluffdale at 14600 South. Draper City discharges stormwater into this segment of the Jordan River.

The Jordan River-6 AU is listed on Utah's 303(d) list of impaired surface waters due to the following impairments:

- E. Coli:
  Levels of E. coli bacteria exceed the standard for Beneficial Use Class 2B—*Infrequent Primary Contact Recreation*, which includes activities such as wading and fishing.
- Total Dissolved Solids (TDS):
  Levels of dissolved solids exceed the standard for Beneficial Use Class 4—*Agriculture*, which includes crop irrigation and livestock watering.
- Aquatic Life Impairment (Biological Indicators):
  Biological monitoring, known as Benthic Invertebrate Assessments, indicates poor aquatic habitat and water quality conditions that do not support Beneficial Use Class 3B—*Warm Water Fishery and Aquatic Life*.
- Selenium:
  Levels of selenium exceed the standard for Beneficial Use Class 3B—*Warm Water Fishery and Aquatic Life*

While a TMDL has been identified for each of the Jordan River-6 AU impairments, a Jordan River-6 AU TMDL has not yet been approved.

Jordan River Watershed

Several segments of the Jordan River, known as assessment units, are listed as impaired surface waters under Section 303(d) of the Clean Water Act due to exceedances of water quality standards for E. coli and/or low dissolved oxygen.

A watershed-wide TMDL for the Jordan River Watershed has been developed by the State and approved by the Environmental Protection Agency (EPA) for the following impairments:

- E. Coli
  Levels of E. coli bacteria exceed the standard for Beneficial Use Class 2B—*Infrequent Primary Contact Recreation*, which includes activities such as wading and fishing.
- Low Dissolved Oxygen
  Levels of phosphorus exceed the standard for Beneficial Use Class 3D—*Waterfowl, Shorebirds, and Associated Wildlife*.

Pollutants Contributing to Impaired Waters:

Fecal Matter (E. coli Impairment)

- Pollutant Source(s): Fecal matter from humans, wildlife, and domestic pets
- Targeted Areas: Locations with onsite wastewater systems, high recreational use, dense wildlife populations (particularly waterfowl), and areas with frequent domestic pet activity.
- Impact to Water Quality: High levels of E. coli in water indicate fecal contamination, which poses a public health risk. Contaminated water may contain harmful pathogens (e.g., viruses, bacteria, parasites) that can cause illness through direct contact or ingestion. Water with high levels of E. coli may be unsafe for wading, fishing, and other recreational activities.

Organic Matter (Dissolved Oxygen Impairment):

- Pollutant Source(s): Decomposing organic matter (e.g., grass clippings, leaves, yard debris), excess nutrients (nitrogen and phosphorus)
- Targeted Areas: Residential, commercial, municipal, and industrial
- Impact to Water Quality: As organic matter decomposes in water, it consumes Dissolved Oxygen (DO). Low DO levels can stress or kill aquatic organisms, leading to reduced biodiversity and, in severe cases, ecosystem collapse. Nutrient pollution can also fuel algal blooms, which further deplete DO in water when the algal blooms die and decompose.

Dissolvable Solids (Total Dissolved Solids Impairment)

- Pollutant Source(s): Urban runoff, fertilizers and pesticides applied to lawns and agricultural areas, road salts, sediment erosion
- Targeted Areas: Residential, commercial, municipal, and industrial areas, as well as construction sites
- Impact to Water Quality: While some dissolved minerals are naturally occurring and beneficial, high levels of Total Dissolved Solids (TDS) can:
  - Alter water chemistry and disrupt ecological balance

- Inhibit the growth of aquatic organisms
- Cause stress or death in sensitive species

Selenium (Selenium Impairment):

- Pollutant Source(s): Selenium-bearing rocks and soils.
- Targeted Areas: Agricultural areas with irrigation drainage.
- Impact to Water Quality: High selenium concentrations can be toxic to aquatic organisms, particularly fish.

<u>Measures and BMPs to Control Pollutant Discharges Contributing to:</u>

E. coli:

1. Educate the public that it is illegal to dump waste into the storm drain system.
2. Discourage waterfowl feeding through public outreach and posted signs at public parks where waterfowl congregate.
3. Promote the Draper City hotline for reporting illegal dumping.
4. Provide and maintain permanent sanitary waste facilities in high-use recreation areas.
5. Provide temporary sanitary waste facilities at MS4 owned or operated facilities and events when:
    - Public permanent sanitary waste facilities are unavailable or inaccessible (excluding seasonal downtime).
    - High attendance is expected and supplemental capacity is needed.
6. Provide the public with information on proper maintenance and management of onsite wastewater systems.
7. Enforce canine-waste ordinances.

Dissolved Oxygen:

1. Educate the public on proper disposal of grass clippings, leaves, and yard waste.
2. Conduct street sweeping annually and as needed.
3. Promote the Adopt-a-Storm-Drain program to help keep storm drains clear of organic debris.

Total Dissolved Solids:

1. Educate residents, businesses, developers and contractors, and relevant MS4 personnel on proper use of fertilizers and pesticides, and proper storage of road salts.
2. Conduct street sweeping annually and as needed.
3. Require sediment and erosion control measures at construction sites.

Selenium:

1. Provide educational outreach on the potential sources and environmental impacts of selenium pollution.
2. Promote proper management of groundwater discharge and dewatering activities.

3.2. Jordan River E. coli TMDL Compliance Plan

Requirement(s):

- Include a TMDL Compliance Plan addressing the pollutant reduction requirements of the Jordan River Watershed Wide E. coli TMDL.

Public Education and Outreach

- Draper City contributes to and participates in the Salt Lake County Storm Water Coalition, a collaborative program focused on preventing water pollution through public education and outreach. The coalition evaluates, identifies, targets sources, as well as, provides educational content and outreach that addresses E. coli.

E. coli Inventory

- Potential Sources of E. coli in the MS4 are currently being evaluated.

  Inventoried areas will be added to the priority areas identified in subsection 4.2.3.3.-4 of this SWMP and inspected annually.

- Potential Sources of E. coli for MS4 owned and/or Operated Facilities include:
  - Dayland Dog Park
  - Deer Ridge Trailhead
  - East Bench Trailhead
  - Galena Hills Dog Park
  - Ghost Falls Trailhead
  - Mehraban Wetlands Park

Prioritization Plan for E. coli Reduction Activities

Prioritization Criteria:

- Locations with identified onsite wastewater treatment systems, high pet activity, and waterfowl congregation
- Areas directly adjacent to or upstream of waterways
- Neighborhoods with aging sewer infrastructure

Highest Priority: Areas with two prioritization criteria present (e.g., residential areas with older infrastructure near waterways).

BMP plan:

Non-Structural BMPs

- Pet Waste Management
  - Enforce canine-waste ordinances
  - Public Education and Outreach
  - Contribute to and participate in the Salt Lake County Stormwater Coalition
  - Distribute, share, or display relevant educational content via municipal websites, social media platforms, public signage, and newsletters

- Human Waste Management
    - Implement Standard Operating Procedures (SOPs) for vault restroom maintenance
    - Establish SOPs to ensure that the need for portable toilets is evaluated during the planning phase of applicable municipally-sponsored events, and that they are appropriately located and scheduled for regular servicing when required.

Structural BMPs

- Pet Waste Management
    - Install pet waste bag dispensers and trash receptacles in high-pet traffic areas.
    - Routinely empty pet waste receptacles
    - Post clear and visible signage encouraging pet owners to pick up after their pets
- Wildlife Waste Management
    - Install signage in parks advising visitors not to feed waterfowl
- Human Waste Management
    - Provide and maintain portable or permanent restroom facilities at trailhead entrances, parks, and other high-use public areas.

3.3 Nitrogen and Phosphorus Reduction

Draper City targets residential, industrial, commercial, and municipal sources that are contributing, or have the potential to contribute, nitrogen and phosphorus to waters of the state.

The City contributes to and participates in the Salt Lake County Storm Water Coalition, a collaborative program focused on preventing water pollution through public education and outreach. The Coalition evaluates, identifies, targets sources, as well as, provides educational content and outreach that addresses pollutants contributing to algal blooms and low dissolved oxygen.

MINIMUM CONTROL MEASURES (MCMs)

Six MCMs serve as the foundation of the Storm Water Management Program and are required under the Utah Pollutant Discharge Elimination System (UPDES) Small MS4 permit. The six MCMs are:

- MCM 1: Public Education and Outreach on Storm Water Impacts
- MCM 2: Public Involvement/Participation
- MCM 3: Illicit Discharge Detection and Elimination
- MCM 4: Construction Site Storm Water Runoff Control
- MCM 5: Long-Term Storm Water Management in New Development and Redevelopment
- MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

Each MCM focuses on a specific program for preventing or reducing pollutants in stormwater runoff and, collectively, are designed to reduce stormwater pollution to the maximum extent practicable.

The following sections of the SWMP outline each MCM's requirements and describe Draper City's approach for implementation, including BMPs and program evaluations.

For questions, comments, or input regarding the City's SWMP, please contact:

Colton Konesky | colton.konesky@draperutah.gov | (801) 576-6331

MCM 1 – PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS

MCM Objective: Implement a public education and outreach program to promote behavior change by the public to reduce water quality impacts associated with pollutants in stormwater runoff and illicit discharges. The program must include:

(1) A multimedia approach targeted and presented to specific audiences for increased effectiveness.
(2) The following four audiences: 1) general public; 2) institutions, industrial, and commercial facilities; and 3) engineers, construction contractors, developers, development review staff, and land use planners; pertinent parties.
(3) Specific messages for each audience, and methods that will be used to evaluate the effectiveness of the messages and the overall program.
(4) Written documentation or rationale as to why particular BMPs were chosen.

4.2.1.1. Targeted Pollutants and Pollutant Sources

Requirement(s):

- Target specific pollutants and pollutant sources determined to be impacting, or have the potential to impact, the beneficial uses of receiving waterways or waterbodies. This includes 1) providing information which describes the potential impacts from stormwater discharges; 2) methods for avoiding, minimizing, reducing and/or eliminating the adverse impacts from stormwater discharges; and 3) the actions individuals can take to improve water quality, including encouraging participation in local environmental stewardship activities.

Implementation:

Draper City is an active member of the Salt Lake County Storm Water Coalition, a county collaborative dedicated to public education and outreach aimed at stormwater pollution prevention. The Coalition collaborates to develop targeted outreach and provide educational content and outreach that address pollutants affecting the Jordan River as well as other common stormwater pollutants.

The City's MCM 1 program is targeting fecal matter, organic matter, salt, and sediment as pollutants known to be impacting the beneficial uses of the Jordan River. In addition, fuels, oils, sediment, and concrete wastewater are targeted as common stormwater pollutants with the potential to adversely affect the beneficial uses of receiving waters.

Targeted pollutant sources are as follows:

Fecal Matter

- Source(s): Domestic pets, waterfowl, and onsite wastewater systems (e.g., septic systems)

Organic Matter

- Source(s): Landscape maintenance (e.g., grass clippings, shrub trimmings), seasonal leaf litter, and leaking trash/waste containment devices

Salt

- Source(s): Uncovered or improperly managed salt storage piles

Fuels and Oils

- Source(s): Construction, commercial, industrial, MS4, or consumer vehicles, and improperly managed chemical containers or storage areas

Sediment

- Source(s): Construction and landscape project sites

Concrete Wastewater

- Source(s): Construction project sites

4.2.1.2.(1.) General Public

Requirements:

- On an annual basis, provide, and document, education and outreach given to the general public on Draper City's prohibitions against illicit discharges and improper disposal of waste and the impacts to water quality associated with these types of discharges. Dates, topics, and number of people educated must be documented for each component of the education and outreach program
    - At minimum, consider the following topics: 1) maintenance of septic systems; 2) effects of outdoor activities such as lawn care (use of pesticides, herbicides, and fertilizers; 3) benefits of onsite infiltration of stormwater; 4) effects of automotive work and car washing on water quality; 5) proper disposal of swimming pool water; 6) proper management of pet waste; and 7) any other relevant topics to the MS4. Topics of which are most relevant to the MS4 must be prioritized in the educational outreach.

Implementation:

Draper City promotes its prohibitions against illicit discharges and improper disposal of waste annually through NotifyDraper and/or Draper Forward.

NotifyDraper is the City's official email/text notification and communication platform. It provides subscribers—including residents, businesses, and community members—with alerts, announcements, updates, upcoming events, and other information of interest to the community.

Draper Forward is the City's official newsletter, published online periodically to share city news, events, and other information of interest to the community.

4.2.1.3.(1.) Institutions, Industrial, and Commercial Facilities

Requirement(s):

- On an annual basis, provide, and document, education and outreach to institutions, industrial, and commercial facilities of Draper City's prohibitions against illicit discharges and improper disposal of waste and the impacts to water quality associated with these types of discharges.

Dates, topics, and number of people educated must be documented for each component of the education and outreach program

- At a minimum, consider the following topics: 1) proper lawn maintenance (use of pesticides, herbicides and fertilizer); 2) benefits of appropriate onsite infiltration of storm water; 3) building and equipment maintenance (proper management of waste water); 4) use of salt or other deicing materials (cover/prevent runoff to storm system and contamination to ground water); 5) proper storage of materials (emphasize pollution prevention); 6) proper management of waste materials and dumpsters (cover and pollution prevention); 7) proper management of parking lot surfaces (sweeping); and 8) any other relevant topics specific to the MS4. Topics of which are most relevant to the MS4 must be prioritized in the educational outreach.

Implementation:

Draper City's Public Works Department hosts two separate events, held on different days, during or around National Public Works Week each year. One event takes place in a school parking lot, while the other is held in a City park parking lot.

At least one of the events incorporates educational outreach focused on how stormwater is typically conveyed through a city's stormwater system, the importance of proper waste disposal practices, and how these practices help protect local waterways.

Educational outreach is delivered through an organized, interactive activity in which classes or other participants are asked questions to assess their understanding of the stormwater system and the importance of stormwater and/or storm drain pollution prevention. Correct responses are rewarded and often elaborated on.

The school parking lot event primarily targets the institutional audience through direct educational engagement with K-6 students from the school. Meanwhile, the City park parking lot event targets both the institutional and general public audiences—as K-6 students are transported by bus to participate—while also providing educational outreach to participating members of the public visiting or passing through the park.

4.2.1.4. Construction Engineers, Contractors, Developers, Development Review Staff, and Land Use Planners

Requirement(s):

- On an annual basis, provide, and document, education and outreach given to engineers, construction contractors, developers, development review staff, and land use planners concerning the development of storm water pollution prevention plans (SWPPPs) and BMP use, to reduce adverse impacts from storm water runoff from development sites. Dates, topics, and number of people educated must be documented for each component of the education and outreach program

Implementation:

Educational outreach is provided to construction contractors and developers on a case-by-case basis, typically during the SWPPP review process and/or throughout active construction phases. These efforts typically focus on the proper selection and implementation of BMPs, as well as an elaboration on—or the clarification of—applicable construction stormwater permit requirements, which are designed to reduce adverse impacts from construction stormwater runoff.

Educational outreach on BMP use is provided to development review staff and land use planners as needed. The Draper City Storm Water Specialist position requires RSR/W certification and generally conducts all SWPPP reviews.

4.1.3.(1.) Best Management Practices

Requirement(s):

- Include BMPS to be implemented for each of the six MCMs.
    - Provide measurable goals for each of the BMPs which include, at a minimum, the months and years in which Draper City will undertake required actions, including: interim milestones and the frequency of the actions, if applicable.

Implementation:

BMP	Measurable Goal	Rationale
DraperNotify and/or Draper Forward	Distribute an article or message regarding Draper City's prohibitions against illicit discharges and improper disposal of waste. Timing: Annually. Interim Milestone: Draft content for Communications review two months in advance.	The city newsletter is an established communication tool that reaches a segment of the community. It also allows for the distribution of more detailed and comprehensive content.
Public Works Week Events	Incorporate educational outreach during the Draper City Public Works Week events. Timing: Annually. Interim Milestone: Update questionnaire and plan participation rewards by May.	The annual stormwater fair is an opportunity to provide educational outreach to elementary school students.
Brochures	Develop and distribute educational brochures. Timing: Annually. Interim Milestone: Content drafted by May each year.	Brochures can reach audiences who may not engage with or be recipients to electronic channels like DraperNotify and/or Draper Forward.
Park Signage	Maintain water pollution prevention signage posted in City parks and trails. Timing: Annually. Inspect in July. Conduct maintenance or replacement activities within 30 days of the inspection.	City parks attract a wide range of visitors, and several of these parks are located near canals where waterfowl tend to congregate. By maintaining water pollution prevention signage in these areas, the city can offer visible reminders to

		the public, discouraging the feeding of waterfowl and promoting the proper disposal of pet waste.
Storm Water Coalition	Support Coalition advertisements, and participate in monthly Coalition meetings. Timing: Pay invoice in July.	By supporting coalition advertisements, Draper City can help public education and outreach spread to a broader audience.
Program Evaluation Method	Develop a localized approach to the program evaluation method. Timing: Ongoing. Interim Milestone: Coordinate with Communications prior to June.	Since the goal is to assess the effectiveness of the public education and outreach across all targeted audiences, it is important to adopt an evaluation approach that captures data from local participants.
LID Training	Initiate a meeting with all engineers, development and plan review staff, and land use planners to review the City's LID goals. Timing: Annually. Interim Milestone: Schedule meeting and draft agenda well in advance.	Holding LID training at the start of the year helps establish a clear understanding of the city's LID goals before the spring and summer, when construction and capital improvement projects typically ramp up.
Employee Training	Give training to City employees on the City's prohibitions against illicit discharges and improper waste disposal. Timing: Annually. Interim Milestone: Review training resources two months in advance of the scheduled annual training	By reviewing training resources and conducting annual training, this ensures topics remain relevant and engaging, and concise information is being presented.
Website Review	Evaluate website content and update as needed. Timing: Annually.	Reviewing the information provided on the website helps ensure that contact details, reporting information, and educational resources remain visible and accessible to the public.

4.1.2. Ongoing Documentation

Requirement(s):

- Have an ongoing documentation process for implementation of the SWMP to evaluate overall UPDES MS4 permit compliance/non-compliance and evaluate the effectiveness of the SWMP implementation to protect water quality.

Note(s):

- 4.2.1.-1.: The City has additional opportunities to promote educational outreach through podcast minisodes. This communication channel is being considered for future educational outreach efforts.
- The Salt Lake County Stormwater Coalition is an effective resource for developing and delivering educational outreach. Opportunities to further promote the Coalition's messages through social media will be explored in coordination with the Communication Department. The Coalition also produces advertisements and maintains a website offering a wide range of educational resources tailored to various audiences.
- Stockpiles associated with scheduled yard projects appear to be increasingly placed in roadways. In some instances, stockpiles are placed several days before project work begins or placed before a precipitation event. This will be considered as a potential educational outreach topic, in addition to swimming pool and hot tub drainage, to raise awareness about proper stockpile placement and stormwater protection.

MCM 2 – PUBLIC INVOLVEMENT/PARTICIPATION

MCM Objective: Implement a program that complies with applicable State and Local public notice requirements. The SWMP shall include ongoing opportunities for public involvement and participation, but at minimum two (2) times annually.

4.2.2.1. Public Notification Program or Policy

Requirement(s):

- Adopt a program or policy directive that allows public input to create opportunities for the public provide input during the decision-making processes involving the development, implementation and update of the SWMP, including development and adoption of all required ordinances of regulatory mechanisms.

Implementation:

The public is notified of proposed policy or code changes through the City Council Agenda. Any public input submitted to the program or Storm Water Specialist is reviewed.

4.2.2.2. SWMP Availability for Public Review

Requirement(s):

- Make the SWMP available to the public for review and input prior to submission to the Division of Water Quality

Implementation:

The latest version of the SWMP is made available on the Draper City website prior to the submission of the SWMP to the Division of Water Quality.

4.2.2.3. SWMP Website Availability

Requirement(s):

- Post the latest version of the SWMP within 180 days from the effective date of the UPDES MS4 Permit on the City website, clearly denote a specific contact person and phone number or email address to allow the public to review and provide input for the duration of the permit, and keep a current version of the SWMP available on the website for public review and input for the duration of the permit.

Implementation:

The latest version of the SWMP is posted on the Draper City website, on the “Storm Water Quality and Pollution Prevention” webpage, within 180 days of the effective date of the Small MS4 permit.

The SWMP can be accessed by clicking on the “Storm Water Management Plan” accordion—which expands to show additional information, including the Storm Water Specialist’s contact information for submitting public input.

4.1.3.(1.) Best Management Practices

Requirement(s):

- Include BMPS to be implemented for each of the six MCMs.
    - Provide measurable goals for each of the BMPs which include, at a minimum, the months and years in which Draper City will undertake required actions, including: interim milestones and the frequency of the actions, if applicable.

Implementation:

BMP	Measurable Goal
Adopt-a-Storm-Drain Program	Promote the Adopt-a-Storm-Drain Program and highlight its goals in helping improve local water quality. Timing: Annually. Complete in September or October Interim Milestone: Finalize promotional content/materials in August.
SWMP Document Availability	Keep a current version of the SWMP document on the City's website. Timing: Replace the existing SWMP document on the website after changes have been made to the document. Interim Milestone: Send the updated document to the Communications Department as needed
Public Notification	Develop a method to notify residents and the general public of SWMP updates and allow for public input. Timing: Ongoing
State and Local Public Notice Requirements	Review state and local public notice requirements. Timing: Annually.

4.1.2. Ongoing Documentation

Requirement(s):

- Have an ongoing documentation process for implementation of the SWMP to evaluate overall UPDES MS4 permit compliance/non-compliance and evaluate the effectiveness of the SWMP implementation to protect water quality.

Note(s):

- The Adopt-a-Storm-Drain program is anticipated to receive significant promotional attention in 2027. This volunteer program is considered an important component of the City's program due to its positive contributions to illicit discharge reporting and its role in supporting educational outreach related to phosphorus and nitrate reduction.

MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

MCM Objective: Revise, as necessary, implement and enforce an Illicit Discharge Detection and Elimination (IDDE) program to systematically find and eliminate sources of non-stormwater discharges from the MS4 and implement defined procedures to prevent illicit connections and discharges.

4.2.3.1. MS4 Map

Requirement(s):

- Maintain an up-to-date map of the MS4 showing all outfalls, receiving waters, storm drain pipes, and other stormwater treatment and conveyance structures within the MS4

Implementation:

An interactive GIS map of the MS4 and all receiving waters is maintained and updated regularly. This map is used for the IDDE program and includes the locations of storm drain inlets, manholes, pipes and pipe flow direction, detention basins, and outfalls.

4.2.3.2.(1.) Regulatory Mechanism

Requirement(s):

- Prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges to the MS4. Require removal of such discharges and implement appropriate enforcement procedures and actions. Discharges authorized by a separate UPDES permit, and non-stormwater discharges listed in Small MS4 Permit, Part 1.2.2.2., are exempt.
    - Have adequate legal authority to detect, investigate, eliminate, and enforce against non-stormwater discharges into the MS4. Include a reference or citation of the authority used to implement all aspects of the IDDE program.

Implementation:

Draper City Municipal Code (DCMC) 16-2-130G.-H.:

- Requires waste or excess concrete or concrete truck rinse water be discharged into preapproved facilities or designated areas
- Prohibits illegal dumping into the MS4

DCMC 16-2-140A. and F.:

- Prohibits the discharge of any pollutants or waters containing any pollutants into the City's storm drain system that cause or contribute to a violation of applicable water quality standards
- Grants access to enter and inspect facilities upon the discovery of an illicit discharge or an illicit connection

DCMC 16-2-200C.:

- Outlines enforcement measures such as a Stop Work Order and payment of a fine if necessary.

- Identifies the Public Works Director (defined as the "Draper City Public Works Director or the Director's designee") as the legal authority responsible for ordering compliance through notice. The notice may require:
    - The elimination of illicit connections or discharges;
    - That violating discharges, practices, or operations shall cease and desist;
    - The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property.

4.2.3.3.(1.-6.) IDDE Plan

Requirement(s):

- Prepare and implement a written plan to detect and address non-stormwater discharges to the MS4. The plan must include:
    - Written systematic procedures for locating and listing the following priority areas likely to have illicit discharges, if applicable: 1) areas with older infrastructure that are more likely to have illicit connections; 2) industrial, commercial, or mixed-use areas; 3) areas with a history of past illicit discharges; 4) areas with a history of illegal dumping; 5) areas with onsite sewage disposal systems; 6) areas with older sewer lines or with a history of sewer overflows or cross-connections; 7) areas upstream of sensitive water bodies; and 8) other areas determined to be likely to have illicit discharges.
        - Document the basis for the selection of each priority area and create a list of all priority areas identified in the system. This priority area list must be updated annually to reflect changing priorities.
    - Dry weather screenings at all outfalls to verify those locations and detect illicit discharges to receiving waters at least once during the 5-year permit term, in which findings must be documented through utilization of an inspection form.
    - Notification of the Division of Water Quality, within 30 days, if it is discovered or suspected that a discharger may need a separate UPDES Permit (e.g., Industrial Stormwater Permit, Dewatering Permit, etc.).
    - Promotion or services provided for the collection of household hazardous waste.
    - A hotline or other local telephone number publicly listed and promoted for public reporting of spills and other illicit discharges. A written record must be kept of all calls received, all follow-up actions taken, and any feedback received from public education efforts.

Implementation:

Draper City staff, along with members of the public, play a critical role in identifying and reporting illicit discharges. In addition to the general reporting of and responding to an illicit discharge, the City implements a proactive approach to the IDDE program in accordance with Small MS4 Permit requirements.

To support early detection, the City conducts dry-weather screening of outfalls and has designated several industrial and commercial zones as priority areas. Priority areas are identified based on the potential type of activities, amount of chemicals or materials stored on site, and discharges that may contribute to E. coli contamination.

Public stormwater infrastructure connected to private priority areas are inspected annually, and all identified outfalls undergo routine dry-weather screening to detect signs of illicit discharges or connections—with at least 20% inspected annually. These inspections are recorded using electronic forms, which include photo documentation and comments. The list of outfalls and priority areas is reviewed annually and updated as needed.

When illicit discharges resulting from improper practices such as illegal dumping, mismanagement of materials, or illicit connections are identified, their locations are documented and added to the City's IDDE database. This data enables the City to track patterns over time, identify recurring problem areas, and revise the list of priority areas as needed.

If a discharge is discovered or suspected to require coverage under a separate UPDES Permit (e.g., Industrial Storm Water permit or Dewatering Permit), the City will attempt to notify the responsible party and will notify the appropriate permitting authority accordingly.

The proper disposal of Household Hazardous Waste (HHW) is promoted by informing residents about available collection services, highlighting the HHW Collection Center located in Sandy City.

An emergency telephone number for reporting illicit discharges is displayed on the City's website. All incident reports received, whether through this hotline or by other reporting methods, are documented and maintained.

4.2.3.4.1.(1.-2.) SOPs – Tracing Illicit Discharges

Requirement(s):

- Implement a SOP for tracing the source of an illicit discharge. The SOP must include procedures for: 1) visual inspections; 2) opening manholes when necessary; 3) using mobile cameras; 4) using field tests of selected chemical parameters as indicators of discharge sources; 5) collecting and analyzing water samples for the purpose of determining sanctions or penalties; and/or 6) other detailed inspection procedures.
    - When the source of an illicit non-stormwater discharge is identified and confirmed, the following information must be recorded in an inspection report: 1) the date the City became aware of the non-storm water discharge; 2) the date the City initiated an investigation of the discharge; 3) the date the discharge was observed; 4) the location of the discharge; 5) a description of the discharge; 6) the method of discovery; 7) the date of removal, repair, or enforcement action; 8) the date and method of removal verification. Analytical monitoring may be necessary to aid in the identification of potential sources of an illicit discharge and to characterize the nature of the illicit discharge. The decision process for utilizing analytical monitoring must be documented in the inspection report.
    - When a reported illicit non-storm water discharge is investigated, but does not impact the MS4's system, the following information must be recorded in an inspection report: 1) the date the City became aware of the reported non-storm water discharge; 2) the date the City initiated an investigation of the reported discharge; 3) the location of the reported discharge; 4) a description of the reported discharge; and 5) a description of the steps taken to confirm that the City's MS4 wasn't impacted.

Implementation:

Following the review of a verbal or written concern or report regarding a potential illicit discharge—an initial, brief pre-investigation is conducted using the Draper City MS4 map to identify areas of its MS4 that may be affected and require investigation.

The established Tracing Illicit Discharges SOP is then implemented at the identified area(s) to investigate an illicit discharge and determine whether an illicit discharge has occurred. Depending on the investigation findings, one of the following outcomes is documented:

- Illicit Discharge Confirmed: When an illicit discharge is identified and confirmed, documentation is collected, prepared, and maintained to record the investigation findings and support the corresponding inspection report.
- No Draper MS4 Impact Identified: When an investigation determines that a reported illicit discharge did not result in an impact to the Draper MS4, documentation is likewise collected, prepared, and maintained to record the inspection findings and support the corresponding inspection report.

4.2.3.4.2. SOPs – Characterizing Illicit Discharges

Requirement(s):

- Implement SOPs for characterizing the nature of illicit discharges and the potential public or environmental threat posed by the discharges when found by or reported to the City by the hotline or other telephone number. These procedures must include detailed instructions for determining the substance of the illicit discharge. If a substance is unknown, there must be procedures for evaluating or referring substance characterization to an alternative person.

Implementation:

A Characterizing the Nature of Illicit Discharges SOP has been established, and the City's website provides definitions of illicit discharge and illegal dumping, along with a document outlining the generally acceptable non-stormwater discharges.

4.2.3.4.3.(1.) SOPs – Ceasing Illicit Discharges

Requirement(s):

- Implement SOPs for ceasing the illicit discharge, including: 1) notification of appropriate authorities; 2) notification of the property owner; 3) technical assistance for removing the source of the discharge or otherwise eliminating the discharge; 4) detailed instructions for evaluating how the discharge will be immediately contained, and steps to contain the discharge; 5) follow-up inspections; and 6) escalating enforcement and legal actions if the discharge is not eliminated. Compliance with this provision will be achieved by initiating an investigation immediately upon being alerted of a potential illicit discharge. Illicit discharge(s) to the MS4 are prohibited and any such discharges are a continuing violation of this Permit until the discharge(s) are eliminated.
    - Upon confirmation of an illicit non-storm water discharge which impacted the MS4's system, ensure immediate cessation of illicit non-storm water discharges. Upon confirmation of responsible parties, take all necessary actions in accordance with

enforcement procedures. If the responsible party is unknown when the illicit non-storm water discharge is confirmed, take all necessary steps to cease the discharge.

Implementation:

SOPs for ceasing illicit discharges have been established and are implemented through the City's Removing Illicit Discharges and Spill Containment & Clean Up SOPs.

When an illicit discharge is confirmed, measures and/or notifications are initiated to ensure its immediate cessation. Enforcement actions are initiated in accordance with established procedures and, depending on the severity and nature of the violation, may include the issuance of a Notice of Violation, Stop Work Order, and/or the imposition of fines as authorized by City ordinance.

4.2.3.4.4. SOPs – Spill and Improper Disposal

Requirement(s):

- Develop a written spill and improper disposal response SOP including a flow chart for internal use, that shows the procedures for responding to public referrals of illicit discharges, the various responsible agencies and respective contacts, and who would be involved in illicit discharge incident response, even if it is a different Person other than the City. The list shall be maintained and updated as changes occur.

Implementation:

A Reporting and Response SOP, IDDE Incoming Call Report Form, and Reporting and Response Flow Chart have been established for internal use and reference.

4.2.3.4.5. Program Evaluation and Assessment

Requirement(s):

- Implement procedures for program evaluation and assessment which includes maintaining a database for mapping; tracking of the number and type of spills or illicit discharges identified; and inspections conducted pursuant to potential illicit discharges.

Implementation:

An IDDE database is maintained to support the identification of priority areas and facilitate the ongoing evaluation and assessment of the program's effectiveness. The IDDE database consists of mapping, spreadsheets, report-specific documentation (including emails, text messages, voicemails, and screenshots) applicable SOPs, and other supporting materials, as needed.

4.2.3.5 Records

Requirement(s):

- Thoroughly document all IDDE investigations. Inspection reports must be provided to the permitting authority upon request. All IDDE documentation must be retained for a period of five years. This period may be extended by the permitting authority at any time.

Implementation:

All program documentation is retained for a minimum period of five years and is maintained in an organized manner to ensure it is readily accessible and available upon request by the permitting authority.

4.2.3.6.(1.-3.) Training

Requirement(s):

- At a minimum, train all staff, office personnel, or other responsible entities that, as part of their normal job responsibilities, might come into contact with, receive calls, or otherwise observe an illicit non-storm water discharge as follows:
    - Ensure that new hires are trained within 60 days of hire and annually thereafter, at a minimum. Follow-up training must be provided, as needed, to address changes in procedures, methods, or staffing.
    - The training must, at a minimum, include topics relating to illicit non-storm water discharges including: 1) identification and reporting; 2) investigation, termination, clean-up, and enforcement procedures; and 3) investigation documentation requirements. Training must focus on the topics most relevant to the employee's position to ensure protection of water quality.
    - Keep and maintain annual and new hire training records that include dates, activities or course descriptions, and names and positions of staff in attendance.

Implementation:

All Draper City employees receive training on the City's prohibition against illicit discharges, improper waste disposal, and the impacts to water quality associated with these types of discharges. This training is provided to all new employees upon hire and to all staff on an annual basis.

Annual IDDE training is given to all relevant Draper City employees who are likely to encounter or observe illicit discharges or illicit connections as part of their job duties. All new hires receive training on illicit discharge reporting and impacts to water quality associated with those discharges to ensure early awareness.

Records of all education and training activities are maintained within the City's electronic filing system.

4.2.3.7. Requests from the Permitting Authority

Requirement(s): The permitting authority reserves the right to request documentation or further investigation of a particular non-storm water discharge of concern, to determine a reasonable basis for allowing the non-storm water discharge and excluding the discharge from the City's program or to require inclusion of the discharge in the City's program, if water quality concerns cannot otherwise be reasonably satisfied.

4.1.3.(1.) Best Management Practices

Requirement(s):

- Include BMPS to be implemented for each of the six MCMs.

- Provide measurable goals for each of the BMPs which include, at a minimum, the months and years in which Draper City will undertake required actions, including: interim milestones and the frequency of the actions, if applicable.

BMP	Measurable Goal
Priority Area Identification	Review and update (if needed) priority areas likely to have illicit discharges. Timing: Annually and/or as needed.
MS4 Map	Maintain and update the GIS map as needed to reflect new stormwater infrastructure from new development and new capital improvement projects. Timing: Updates completed leading up to or following project completion.
IDDE SOPs	Review IDDE SOPs. Timing: Annually and/or as needed. Interim Milestone: Submit any IDDE SOP updates to the Deputy Public Works Director/City Engineer for review a month in advance.
IDDE Flow Charts	Review the IDDE flow chart to ensure it effectively reflects current procedures for identifying, characterizing, and responding to illicit discharges. Timing: Annually. Update as needed.
Dry Weather Screening Inspections	Inspect 20% of outfalls each year. Timing: Annually. Complete inspections by the end of June. Interim Milestone: Review all outfalls in March and identify any new ones as needed, prior to the start of seasonally dry weather.
Emergency Spill Hotline	Verify accuracy and visibility of the emergency hotline number on the City's website. Timing: Annually. Complete in April.
Training	Ensure IDDE training is given to all applicable Draper City employees. Timing: Annually. Complete in April. Interim Milestone: Review training materials in February each year.
Website	Review the website to ensure public reporting tools are accurate and that supplemental information is available to help identify and report illicit discharges. Timing: Annually. Complete in March.

4.1.2. Ongoing Documentation

Requirement(s):

- Have an ongoing documentation process for implementation of the SWMP to evaluate overall UPDES MS4 permit compliance/non-compliance and evaluate the effectiveness of the SWMP implementation to protect water quality.

Note(s):

- 4.2.3.4.2. – The City's website currently provides definitions of illicit discharge and illegal dumping, along with a document outlining generally acceptable non-stormwater discharges. In early 2027, the Characterizing the Nature of Illicit Discharges SOP is expected to be revised to improve clarity. Upon completion of the revision, the SOP will be published on the appliable webpage of the City's website following completion of the revision.
- There has been a noticeable increase in Illicit discharge reports during 2026, which may reflect growing community awareness and/or increased public engagement in identifying and reporting potential discharges. Illicit discharges within Draper City are most often reported directly to the City. Reports are occasionally first received by the Salt Lake County Health Department or the Utah Division of Water Quality.

MCM 4 – CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

MCM Objective: Revise, as necessary, implement and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from a qualifying construction site. A qualifying construction site is any public or private construction site with a land disturbance of one acre or more, or any project site with less than one acre that is a part of a larger common plan of development or sale which collectively disturbs land greater than or equal to one acre.

4.2.4.1.(1.-3.) Regulatory Authority

Requirement(s):

- Revise, as necessary, and enforce an ordinance or other regulatory mechanism that requires compliance with all requirements set forth in the most current, applicable UPDES construction stormwater permits. The regulatory mechanism must include sanctions to ensure compliance and must apply to all qualifying construction sites.
    - Require construction operators to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) to protect water quality. The SWPPP requirements must be consistent with the SWPPP requirements set forth in the most current applicable UPDES construction stormwater permits.
    - Require construction operators to obtain coverage under the current, applicable UPDES construction stormwater permits for the duration of the project. Require construction operators to renew coverage, if necessary, and terminate permit coverage, when appropriate.
    - Include a provision for access by qualified personnel to inspect construction sites, including stormwater BMPs on private properties that discharge to the MS4.

Implementation:

Draper City Municipal Code (DCMC) 16-2-150:

- Requires a SWPPP prior to the issuance of certain City permits
- Requires the SWPPP to conform to the requirements set forth by the Utah Department of Environmental Quality.
- Requires state construction stormwater permit coverage for qualifying construction sites.
- Outlines that the SWPPP must include provisions allowing city personnel for access and inspections on a reasonable basis

DCMC 16-2-200:

- Identifies the Public Works Director (defined as “Draper City’s Public Works Director or the Director’s designee) as the authority responsible for ordering compliance through notice. The notice may require payment of a fine to cover administrative costs.
- Identifies that, in the event any holder of a state stormwater permit for construction activities violates the terms of the permit, the Public Works Director may issue a stop work order.

4.2.4.2.(1.-2.) Enforcement Strategy

Requirement(s):

- Develop a written enforcement strategy, and implement the enforcement provisions of the regulatory mechanism. The enforcement strategy must include:
  - A construction oversight inspection SOP that includes 1) specific processes and sanctions to minimize the occurrence of violations and obtain compliance from violators; 2) appropriate escalating enforcement procedures and actions, including an appeals process that is published in a publicly accessible location; 3) notification and documentation procedures for enforcement actions; and 4) a definition of who has authority to implement procedures on behalf of the MS4. Standard Operating Procedures (SOPs) or similar types of documents that include specific processes and sanctions to minimize the occurrence of violations and obtain compliance from violators.
  - Documentation and tracking of all enforcement actions.

Implementation:

When the Draper City Storm Water Specialist or Storm Water Compliance Inspector ("City construction stormwater inspector)" identifies a violation of the current, applicable UPDES construction stormwater permit, in accordance with the City's Construction Stormwater Oversight Inspection SOP, it is classified into one of the following categories:

- General Violation: A violation that may require oversight re-inspection(s) to verify corrective action. If the violation(s) remain unaddressed or is not adequately corrected after two or more re-inspections, an administrative fine may be imposed.
- River/Stream Impact Violation: A violation involving pollutants clearly entering a river or a stream, which may result in the immediate issuance of a Stop Work Order.

<u>General Violation(s) and Administrative Fine(s)</u>

Ongoing general violations that remain addressed or are not adequately corrected may result in the imposition of an administrative fine. The oversight enforcement strategy for addressing general violations is typically as follows:

1. Notice of Violation #1: When a general violation is identified, the City stormwater inspector shall, at a minimum, complete the following actions:
   I. Complete a construction stormwater oversight inspection report, using the DWQ's inspection form. The report shall:
      - Document the identified violation(s);
      - Include supporting photographic documentation;
      - Cite the applicable Part(s) of the current, applicable UPDES construction stormwater permit; and
      - Identify a scheduled reinspection date.
   II. Distribute a supplemental email to the site contact(s) that identifies or references the violation(s) documented in the inspection report and communicates the scheduled re-inspection date.

2. Notice of Violation #2: If the same violation(s) remain uncorrected or inadequately addressed at the first re-inspection, the City construction stormwater inspector shall repeat actions I. and II. outlined above and also incorporate a written warning into the inspection report and supplemental email.
3. Notice of Violation #3: If the same violation(s) remain uncorrected or inadequately addressed at the second re-inspection or any subsequent re-inspection, Draper City may impose an administrative fine.

Once an administration fine is imposed, the fine may continue to be imposed each business day that the specific violation remains uncorrected, beginning on the day after the day which the initial administrative fine is imposed.

River/Stream Impact Violation(s) and Stop Work Order(s)

A river/stream impact violation may result in the immediate issuance of a stop work order. The stop work order remains in effect until appropriate corrective action has been taken and/or stormwater controls have been designed and implemented in accordance with the applicable, current UPDES construction stormwater permit and verified through a re-inspection by a City construction stormwater inspector.

Appeals Process

Any person or entity that believes an enforcement has been applied erroneously may appeal to the Public Works Director. The appeal shall be in writing, state any facts supporting the appeal, and be made within ten (10) working days of the decision or action being appealed. The Director may elect to hold a hearing on the appeal. The director shall decide the appeal within ten (10) working days of when the appeal is filed. If the person or entity is not satisfied with the director's decision, a further appeal may be made to the City Manager. The appeal to the City Manager shall follow the same procedure as the appeal to the Director. The City Manager's decision shall be final and binding on all parties.

4.2.4.3.(1.-3.) Pre-Construction SWPPP Review

Requirement(s):

- Develop and implement a checklist for pre-construction Storm Water Pollution Prevention Plan (SWPPP) review that is consistent with the requirements of the current, applicable UPDES construction stormwater permits. Prior to construction:
  - Conduct a pre-construction SWPPP meeting which includes a review of: 1) the site design; 2) the planned operations at the construction site; 3) planned BMPs during the construction phase; 4) the planned BMPs to manage runoff created after development; and 5) the City's enforcement policy.
  - Develop procedures for receiving and considering information and comments submitted by the public on proposed projects.
  - Determine whether the site is a priority construction site.

Implementation:

Pre-construction SWPPP review checklists developed by the Division of Water Quality are used by qualified Draper City staff to evaluate submitted SWPPPs. These checklists are consistent with the SWPPP content requirements of the current, applicable UPDES construction stormwater permits.

As part of the SWPPP review process, each project site is evaluated to determine whether it meets the criteria for designation as a priority site. Priority site designation is based on site-specific risk factors, which may include:

- Soil erosion potential;
- Site slope;
- Project size and type;
- Proximity to receiving surface waters of the state; and/or
- A history of non-compliance by the project operator.

Upon approval of a project's SWPPP by Draper City, an email notification and completed SWPPP evaluation document is distributed to the construction operator, owner, and/or duly authorized representative for their records. This correspondence and/or subsequent correspondence typically includes:

- Confirmation that that submitted SWPPP has been reviewed and approved by Draper City based on its consistency with the requirements of the current, applicable UPDES construction stormwater permit;
- Transparency on Draper City construction stormwater electronic-site oversight requirements;
- Electronic-site inspection guidance documentation
- An on-site oversight inspection agreement form;
- Instructions for scheduling the pre-construction meeting or details regarding the pre-construction meeting; and
- Instructions for scheduling the pre-construction site inspection with a City construction stormwater inspector.

After the applicable City permit(s) have been obtained and/or before the commencement of project earth-disturbing activities (excluding those necessary for initial-phase BMP installation), the construction operator, owner, duly authorized representative, or designee is expected to schedule and complete a pre-construction site inspection with a City construction stormwater inspector in accordance with Utah Code § 19-5-108.3(9)(b). Depending on the City permit, the pre-construction site inspection and meeting may be conducted at the same time.

The purpose of the pre-construction site inspection is to verify that all initial-phase BMPs (e.g., track-out controls, perimeter controls, portable toilet secure-down, inlet protection, etc.) are properly implemented and/or installed, the SWPPP sign is posted and readable from a public right-of-way, and a copy of the SWPPP is available for review.

4.2.4.4.(1., 2., 2.1-.2., and 3.-6.) Construction Site Stormwater Runoff Control Inspection Program

Requirement(s):

- Implement and document a construction site stormwater runoff control inspection program to ensure compliance with all requirements set forth in the most current, applicable UPDES construction stormwater permits. The program must include the following:
    - SOPs developed and implemented for construction oversight inspections of qualifying construction sites which include: 1) who is responsible for site inspections; 2) procedures for the oversight inspections, follow-up, and documentation; and 3) procedures for being notified by construction operators/owners of completion of active construction so the City may conduct verification of final stabilization and removal of all temporary control measures.
    - Inspections conducted by qualified personnel using the Division of Water Quality's construction oversight inspection form.
    - Monthly inspections of all new qualifying construction sites.
        - Upon a non-priority qualifying construction site showing an adequate compliance history, the monthly inspection frequency must be reduced to 1) one inspection each year during active construction; 2) one inspection following active construction; and 3) inspections to investigate any verified complaint. If at any point, the site does not meet the definition of an adequate compliance history, monthly inspections must resume until the the site regains an adequate compliance history.
    - Priority inspections, which must be conducted at least once every month.
    - Inspections at qualifying construction sites, at minimum, of all phases of construction, including 1) one inspection prior to land disturbance; 2) one inspection each year during active construction; 3) one inspection following active construction; and 4) inspections to investigate any verified complaint.
    - An electronic-site inspection, which must be utilized to conduct an oversight inspection at qualifying construction sites unless there is a documented reason for justifying an on-site oversight inspection. A 48-hours advance notice of an on-site oversight inspection must be provided unless there is an imminent threat of a pollutant discharge.
    - Necessary follow-up actions (e.g., re-inspection and/or enforcement) to ensure compliance in accordance with the City's enforcement strategy, which must be tracked and documented.

Implementation:

A Construction Stormwater Oversight Inspections SOP has been adopted, which identifies the Storm Water Specialist and Storm Water Compliance Inspector as the positions responsible for conducting all qualifying site inspections and implementing applicable enforcement procedures. The Storm Water Specialist and Storm Water Compliance Inspector maintain the RSI certification.

All construction stormwater oversight inspections conducted at qualifying sites are documented using the applicable inspection form found on the Utah Division of Water Quality website.

Construction stormwater oversight inspections for qualifying sites are conducted at the following frequencies:

- Non-Priority Sites – Monthly, with Reduced Frequency Upon Demonstration of an Adequate Compliance History: Routine oversight inspections are conducted monthly at non-priority sites, excluding scheduled re-inspections and inspections resulting from verified complaints/tips.
    - Routine oversight inspection frequency is reduced in accordance with Small MS4 Permit, Part 4.2.4.4., for non-priority sites that demonstrate an adequate compliance history as defined in this SWMP. If at any point, the site does not meet the definition of an adequate compliance history, Draper City resumes routine monthly oversight inspections until the site regains an adequate compliance history.
- Priority Sites – Monthly: Routine oversight inspections are conducted at least monthly, excluding scheduled re-inspection and inspections resulting from verified complaints/tips.

An electronic-site oversight inspection is Draper City's default method of conducting oversight construction stormwater inspections unless there is a documented reason justifying an on-site oversight inspection.

Electronic-site oversight inspections rely on the construction operator, owner, or duly authorized representative (DAR) to provide electronic-site documentation that meet state code requirements, accurately represents on-site conditions and is equivalent in quality to visuals observed during an on-site oversight inspection, and overall supports an oversight inspection.

Although Draper City is required to conduct electronic-site oversight inspections by default, the construction operator, owner, or DAR is not required to provide photo or video documentation. Participation in the electronic-site inspection process is voluntary and becomes an expectation only if the operator, owner, or DAR elects to participate.

An on-site oversight inspection is considered justified when there is a documented reason, such as:

- The construction operator, owner, or DAR has completed and returned a Draper City On-Site Oversight Inspection Agreement, allowing the City to conduct on-site oversight inspections by default.
- The construction operator, owner, or DAR has not established with the City whether oversight inspections will be on-site or electronic-site oversight inspections, and the site contact fails to respond to a phone call, text message, and/or voicemail leading up to a scheduled oversight inspection.
- Submitted or uploaded photo or video documentation includes inadequate characterization of site conditions or portions of the site, or if there is any other noncompliance with permit conditions that warrants an on-site inspection. An 48-hours advance notice of an on-site inspection is provided unless there is an imminent threat of a discharge.

Necessary follow-up actions are taken to ensure compliance in accordance with Draper City's enforcement strategy. All scheduled oversight inspections, complaint-/tip-based inspections, re-inspections, and enforcement actions are tracked and documented.

As a project nears completion, a City construction stormwater inspector identifies and documents applicable NOT conditions at the bottom of an oversight inspection report. The inspector also provides subsequent correspondence to the site contact regarding the applicable NOT conditions and/or a guidance document for submitting an NOT.

4.2.4.5.(1.-3.) Training

Requirement(s):

- Provide training to all staff whose primary job duties are related to implementing the construction stormwater program as follows:
    - Ensure new hires are trained within 60 days of hire and annually thereafter, at a minimum. Follow-up training shall be provided as needed to address changes in procedures, methods, or staffing.
    - The training must, at minimum, include topics relating to the construction stormwater program, including: 1) permitting; 2) plan review; 3) construction site inspections; and 4) enforcement of construction projects.
    - Keep and maintain annual and new hire training records that include dates, activities or course descriptions, and names and positions of staff in attendance.

Implementation:

The Storm Water Specialist and Storm Water Compliance Inspector are the primary positions responsible for implementing and coordinating the construction site storm water runoff control program. Individuals assigned to these positions receive initial training and RSI certification within 60 days of their hire date. RSI certification is renewed within two years of the initial certification date and follows this schedule approximately every two years. Training is completed annually and typically includes attendance at relevant external training opportunities, including those offered by the Division of Water Quality.

4.2.4.6. Record Retention

Requirement(s):

- Records of all qualifying construction sites must be maintained, and records which include—but are not limited to—site plan reviews, SWPPP review, oversight inspections, and enforcement actions including any verbal warnings, stop work orders, warning letters, notices of violation, and any other enforcement conducted. Records of these projects must be kept for five years or until construction is completed, whichever is longer.

Implementation:

All SWPPP reviews, approvals and other applicable project records are maintained within the City's electronic filing system for a minimum of five (5) years or until construction is completed, whichever is longer.

4.1.3.(1.) Best Management Practices

Requirement(s):

- Include BMPS to be implemented for each of the six MCMs.
    - Provide measurable goals for each of the BMPs which include, at a minimum, the months and years in which Draper City will undertake required actions, including: interim milestones and the frequency of the actions, if applicable.

Implementation:

BMP	Code
Ordinance Development	OD
Erosion Control Plan	ECP
Zoning	ZO
Land Use Planning/ Management	LIP
Contractor Certification and Inspector Training	CCIT

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4A	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.1.1. Raise awareness of contractors and developers on what is expected on construction sites	Require a SWPPP for every construction site over one acre	Ongoing	OD	Successful if enforced and 95% of all active construction sites have an approved SWPPP
4B	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.2. Develop a written enforcement strategy and implement the enforcement provisions of the ordinance or other regulatory mechanism	Draft ordinance to include escalating enforcement provisions	Completed	OD	Successful if completed
4C	"	MS4 Staff	4.2.4.2. Documentation and tracking of all enforcement actions	Use the developed construction site enforcement action log/database	Ongoing	OD	Successful if we have a log and are using it as required
4D	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.3 Develop and implement SOPs for pre-construction SWPPP review for construction sites	Develop checklist and begin to do preconstruction reviews of SWPPP	Ongoing	ECP	Successful if we are conducting SWPPP reviews
4E	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	MS4 staff and Contractors and Developers	4.2.4.3.1 Conduct a pre-construction meeting	Hold Pre-con meetings for all qualifying sites	Ongoing		Successful if we are conducting Pre-con meetings

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4H	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	MS4 Staff	4.2.4.3.3 Identify priority construction sites, including at a minimum those construction sites discharging directly into or immediately upstream of waters that the State	Develop a "sensitive area" map showing areas within the city where "additional" protection may be desired	Ongoing	LIP	Successful when map is completed and ready for use
4I	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers	4.2.4.4.2 Inspections of all new construction sites ... at least monthly by qualified personnel	Conduct monthly inspections of all construction sites - Emphasize self inspections - sensitive areas to be inspected at least monthly	Ongoing	CCIT	Successful if 100% of all active construction sites are inspected monthly
4J	Sediment, Construction Site Debris, Hydrocarbons, TDS, TSS, E. coli, Trash, pH	Contractors and Developers, MS4 Staff	4.2.4.5 Provide training to city staff and 3rd party designers	Develop a city policy to require all SWPPP inspectors to be RSI inspectors within 6 months	Completed	CCIT	Successful if completed

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
4K	"	Contractors and Developers, MS4 staff	4.2.4.4.2 ...The Permittee must include in its SWMP document a procedure for being notified by construction operators/owners of their completion of active construction so that verification of final stabilization and removal of all temporary control measures may be conducted.	Develop a written Notice of Termination process for use within the city	Ongoing	ECP	Successful if 95% of all active construction sites are terminated appropriately

4L	All Pollutants	MS4 staff	4.2.4.5 Provide training to city staff and 3rd party designers	Train SWPPP inspectors, their supervisors, and any personnel who grant final occupancy permits on the NOT process	Ongoing	ECP	Successful if the stormwater specialist and stormwater compliance inspector are trained annually
4M	All Pollutants	MS4 Staff	4.2.4.4.3 Conduct Bi-weekly inspections on high priority construction sites	Inspect high priority sites	Ongoing	ECP	Successful if all high priority sites are inspected bi-weekly
4N	"	"	4.2.4.6 Maintain a log of active construction sites	Establish a log	Ongoing	ECP	Successful if active construction sites are recorded in the log

4.1.2. Ongoing Documentation

Requirement(s):

- Have an ongoing documentation process for implementation of the SWMP to evaluate overall UPDES MS4 permit compliance/non-compliance and evaluate the effectiveness of the SWMP implementation to protect water quality.

Note(s):

- A limited number of construction operators within Draper City have committed to providing electronic-site inspection documentation to support a Draper City electronic-site construction stormwater oversight inspection at their site. However, this documentation does not always capture all the elements that a City construction stormwater inspector would be trained to look for, such as vehicles and equipment for potential leaks, multiple angles of installed stormwater controls (specifically subsurface inlet protection), adjacent paved roads, etc. Although the electronic-site oversight inspection is a relatively new requirement, the process remains challenging to consistently evaluate, regardless of the documentation provider.
- SWPPP review and construction stormwater oversight inspection documentation are considered strengths of the program. Properly developed SWPPPs that are consistent with applicable permit requirements support more productive pre-construction meeting and site inspections and provide the City's construction stormwater inspector with a stronger foundation for conducting effective oversight inspections.

MCM 5 – POST-CONSTRUCTION STORMWATER MANAGEMENT

MCM Objective: Revise, as necessary, implement, and enforce a program to address post-construction storm water runoff to the MS4 from private and public new development and redevelopment of qualifying construction sites. The water quality considerations of this minimum control measure do not replace or substitute water quantity or flood management requirements implemented on the local level for new development or redevelopment sites.

4.2.5.1.-4. Post-Construction Controls

Requirement(s):

- Have requirements or standards to ensure that any storm water controls or management practices for new development and redevelopment will prevent or minimize impacts to water quality. Storm water controls must be selected to address pollutants known to be discharged, or have potential to be discharged, from the site.
    - Non-structural BMPs must be included. Consider non-structural BMPs including requirements and standards to: 1) minimize development in areas susceptible to erosion and sediment loss; 2) minimize the disturbance of native soils and vegetation; 3) preserve areas that provide important water quality benefits; 4) implement measures for flood control; and 5) protect the integrity of natural resources and sensitive areas.
    - Retention Requirement: Develop and define a specific hydrologic method(s) for calculating runoff volumes and flow rates to ensure consistent sizing of structural storm water controls and to facilitate plan review. The following conditions for new development and redevelopment projects of qualifying construction sites must be required:
        - New development projects must manage rainfall on-site and prevent the off-site discharge of the precipitation from all rainfall events less than or equal to the 80th percentile rainfall event or a predevelopment hydrologic condition, whichever is less.
        - Redevelopment projects must provide a site-specific and project-specific plan aimed at net gain to onsite retention or a reduction to impervious surface to provide similar water quality benefits. If a redevelopment project increases the impervious surface by greater than 10%, the project shall manage rainfall on-site and prevent the off-site discharge of the net increase in the volume associated with the precipitation from all rainfall events less than or equal to the 80th percentile rainfall event.
    - Include a process which requires the evaluation of a LID approach for all projects of qualifying construction sites, subject to the retention requirement above. A minimum of five LID practices must be allowed from the list in Appendix C of the LID Guide.
    - Include a process to evaluate a site's feasibility to implement LID controls. If the City determines that it is infeasible for a site to meet retention requirement above, the City must document rationale for the use of alternative design criteria including storm water controls that provide water quality benefits of LID controls to the maximum extent possible. The City must document and quantify that infiltration, evapotranspiration, and rainwater harvesting have been used to the maximum extent possible and that full employment of these controls are infeasible due to constraints. LID infeasibility may be due to one or more of the following conditions: high ground

water, drinking water source protection areas, soil conditions, slopes, accessibility, excessive costs, or any other justifiable constraint.

Implementation:

Draper City requires new development and redevelopment projects to follow the City's standards for stormwater management.

The Draper City Drainage Design Criteria was adopted in October 2012 and includes specific criteria for use in the design of stormwater facilities. They are presented in two sections: Hydrologic Criteria and Design Criteria. Hydrologic Criteria includes precipitation, drainage design frequency, design storm distribution and duration, and the storm drainage modeling method. Design criteria includes street drainage, storm inlets, storm drains, stormwater quantity control facilities, and easements.

New development projects disturbing greater than or equal to one acre of land (individually or as part of a larger common plan of development) are required to manage rainfall on-site for rain events up to the 80th percentile rainfall event or predevelopment hydrologic conditions, whichever is less. This is achieved through the use of practices that infiltrate, evapotranspirate, and harvest and reuse rainwater.

Redevelopment projects disturbing greater than or equal to one acre of land (individually or as part of a larger common plan of development) are required to submit a submit a site-specific and project-specific plan to show net gain to on-site retention or a reduction to impervious surfaces to provide similar water quality benefits. If the project increases impervious surfaces by more than 10%, it must manage net increase in runoff volume onsite for rainfall events up to the 80th percentile event through the use of practices that infiltrate, evapotranspirate, and harvest and reuse rainwater.

All applicable new development and redevelopment projects are evaluated for Low Impact Development (LID). The Guide to Low Impact Development within Utah is provided to developers for reference, as needed, and all of its outlined LID practices in Appendix C are acceptable within Draper City.

4.2.5.2.(1.-4.) Regulatory Mechanism

Requirement(s):

- Develop, adopt, and implement an ordinance or other regulatory mechanism that requires long-term post-construction storm water controls at new development and redevelopment sites that are qualifying construction sites. The regulatory mechanism must require stormwater control selection, design, installation, operation, and maintenance standards as necessary to protect water quality and reduce the discharge of pollutants to the MS4. The regulatory mechanism must include enforcement provisions. The regulatory mechanism must also include:
    - Enforcement provisions in the regulatory mechanism which include specific processes and sanctions to minimize the occurrences of violations and obtain compliance from chronic and recalcitrant violators. These processes and sanctions must include appropriate, escalating enforcement procedures and actions, including an appeals process. Develop a written enforcement strategy and implement the enforcement provisions of the regulatory mechanism.

- Provisions for post-construction access for the City to inspect stormwater control measures on private properties that discharge to the MS4 to ensure that adequate maintenance is being performed.
- As applicable, a maintenance agreement for maintenance of control measures installed on site, in which case the agreement must allow: 1) the City to conduct oversight inspections of the any installed storm water control measures onsite; 2) account for transfer of responsibility in leases and/or deeds; and 3) allow the City to perform necessary maintenance or corrective actions neglected by the property owner/operator and bill or recoup costs from the property owner/operator as needed. If the private Person neglects maintenance on a storm water control, the City must ensure maintenance per its enforcement program; including, conducting the maintenance and recouping costs, if necessary.
- Maintained documentation on how the requirements of the ordinance or other regulatory mechanism will protect water quality and reduce the discharge of pollutants to the MS4. Documentation must include: 1) how long-term storm water controls were selected; 2) the pollutant removal performance expected from the selected controls; and 3) the technical basis that supports the performance claims for the selected controls.

Implementation:

Draper City Municipal Code (DCMC) 16-2-170:

- References documents that include a list of acceptable LID practices and BMPs that include specific design performance criteria and operation and maintenance requirements for each stormwater practice.
- Requires LID/BMPs to be incorporated into site drainage and water quality for sites that require a UPDES construction general permit.
- Requires agreements for new development and redevelopment construction sites completed after January 1, 2003, disturbing 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, and to be served by a private on-site stormwater management facility. This agreement grants the City permission to access the property at reasonable times and to inspect the drainage facilities, maintenance and preservation plan, and owner annual inspection records to ensure the maintenance and preservation plan is being executed.

DCMC 16-2-180:

- Requires the owner of a privately owned stormwater management facility to perform an annual inspection, submit the annual inspection report to the city, and retain records for at least five years.
- States that if a property owner fails or refuses to meet the inspection, design or maintenance standards required for stormwater facilities, the Public Works Director, after reasonable notice, may correct a violation of the standards or maintenance needs by performing all necessary work to place the facility in proper working condition. The cost of any action by the Public Works Director shall be charged to the responsible party.

Sections 5, 7, and 8 of the City's Stormwater Pollution Prevention Maintenance Agreement detail procedures for notifying an owner of deficiencies, the City taking corrective action, and the reimbursement for any corrective action taken by the City.

4.2.5.3.(1.-2.) Plan Review

Requirement(s):

- Adopt and implement SOPs for site plan review that evaluate potential water quality impacts. The SOPs must apply through the life of the project from conceptual design to project closeout.
- Review post-construction plans for, at a minimum, all new development and redevelopment sites that are qualifying construction sites to ensure that the plans include long-term storm water management measures that meet the requirements of the post-construction stormwater management program.

Implementation:

Draper City reviews post-construction plans, at a minimum, for all new development and redevelopment sites that are required to obtain a City Land Disturbance Permit.

4.2.5.4.(1.-2.1) Inspections

Requirement(s):

- Adopt and implement SOPs for site inspection and enforcement of post-construction stormwater control measures to ensure adequate ongoing long-term operation and maintenance of approved storm water control measures. These SOPs must, at a minimum, include procedures for inspection, follow-up, and documentation according to the requirements below:
    - Inspect, using a person who has been appropriately trained, permanent structural storm water controls at least once during installation. Upon completion of the control, the City must verify that long-term storm water controls were constructed as designed. Document these inspections.
    - The City, or, if applicable, the property owner/operator, must conduct inspections and any necessary maintenance at least every other year, or as necessary, to maintain functionality of the control. On sites where the property owner/operator is conducting maintenance, the City must inspect those storm water control measures and associated owner/operator inspection documentation at least once every five years, or more frequently, as determined by the City, to verify and ensure that adequate maintenance is being performed. The City, or the property owner/operator, shall document these inspections in an inspection report.
        - The inspection report must include the following: 1) inspection date; 2) name and signature of inspector; 3) project location; 4) current ownership information; 5) a description of the condition of the storm water control measure including the condition of: vegetation and soils; inlet and outlet channels and structures; catch basins; spillways; weirs, and other control structures; and sediment and debris accumulation in storage as well as in and around inlet and outlet structures; and 6) specific maintenance issues or

	violations found that need to be corrected by the property owner/operator along with deadlines and re-inspection dates.

Implementation:

Draper City inspects the permanent structural stormwater controls that convey stormwater runoff to the Draper City MS4 at least once during installation. This inspection is also documented. The City also requires written verification from the project's engineer that all stormwater controls have been constructed according to the approved design.

Private and public property owners who have entered into a Draper City Stormwater Pollution Prevention Maintenance Agreement (SWMPPA) are responsible for conducting annual inspections and maintenance of their structural stormwater control(s) in accordance with the SWMPPA. If an annual inspection report is not submitted, Draper City schedules and conducts an inspection in accordance with the SWMPPA.

4.2.5.5.(1.-2.) Inventory

Requirement(s):

- Maintain an inventory of all post-construction structural storm water control measures installed and implemented at new development and redevelopment sites that are qualifying construction sites. This inventory must include both public and private sector sites located within the City's service area that were developed since the City obtained coverage by this Permit, or the date that post-construction requirements came into effect, whichever is later.
    - Each entry to the inventory must include: 1) basic information on each project, such as project's name, owner's name and contact information, location, installation date, etc.; 2) short description of each storm water control measure (type, number, design or performance specifications); 3) short description of maintenance requirements (frequency of required maintenance and inspections); and 4) inspection information (date, findings, follow up activities, prioritization of follow-up activities, compliance status).
    - Based on inspections conducted, update the inventory when changes occur in property ownership, or in the specific control measures implemented at the site.

Implementation:

Draper City maps all properties that have entered into a Draper City SWMPPA. This interactive GIS map includes the approved and recorded plan information, and a separate spreadsheet identifies the applicable post-construction structural stormwater controls, project name, site contact information, inspection date(s), and location of properties that have entered into a Draper City SWMPPA.

4.2.5.6.(1.-3.) Training

Requirement(s):

- Provide training to all staff, including MS4 inspectors, engineers, development and plan review staff, land use planners, and other pertinent parties, whose primary job duties are related to implementing the post-construction storm water management program as follows:

- Ensure that new hires are trained within 60 days of hire, and annually thereafter, at a minimum. Follow-up training must be provided, as needed, to address changes in procedures, methods, or staffing.
- The training must, at a minimum, include topics relating to the post- construction storm water program including procedures for: 1) fundamentals of long-term storm water management; 2) plan review; 3) inspections; 4) enforcement; 5) LID and green infrastructure practices; and 6) the specific requirements for post-construction control and the associated storm water controls identified in the SWMP. Training must focus on the topics most relevant to the employee's position to ensure protection of water quality.
- Keep and maintain annual and new hire training records that include dates, activities or course descriptions, and names and positions of staff in attendance.

Implementation:

Initial training is provided to newly hired employees, and annual online training courses are provided to all relevant Draper City employees involved in post-construction storm water management. Records of all training activities are maintained within the City's electronic filing system.

4.1.3.(1.) Best Management Practices

Requirement(s):

- Include BMPS to be implemented for each of the six MCMs.
  - Provide measurable goals for each of the BMPs which include, at a minimum, the months and years in which Draper City will undertake required actions, including: interim milestones and the frequency of the actions, if applicable.

Implementation:

BMP	Code
Ordinance Development	OD
Infrastructure Planning	IPL
Education Materials	EM
Land Use Planning/ Management	LIP
BMP Inspection and Maintenance	BMPIM

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5A	All Pollutants	All Audiences	4.2.5.2. Develop and adopt an ordinance or other regulatory mechanism that requires long-term post-construction storm water controls at new development and redevelopment sites. (4.2.5.1.3. for LID)	Draft ordinance revisions	Completed	OD	If review is complete
5B	"	"	"	Adopt updated ordinance	Completed	OD	If ordinance has been passed
5C	"		4.2.5.2.4. Documentation on how the requirements of the ordinance or other regulatory mechanism will protect water quality and reduce the discharge of pollutants to the MS4.	Draft a standard to require contractors and developers to submit documentation on: how long-term BMPs were selected, pollutant removal expected from the BMP, and technical basis supporting performance claims	Ongoing	IPL	If draft is completed by the milestone date
5D	"	"	"	Adopt revised standard	Ongoing	IPL	

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5F	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff, Contractors and Developers	4.2.5.1.2. Each Permittee shall develop and define specific hydrologic method or methods for calculating runoff volumes and flow rates…	Review existing design standards to see if they meet new permit requirements - see section 4.2.5.3.4	Ongoing	IPL	Adopted
5G	"	"	"	Update design standards	Ongoing	IPL	If updated standards have been adopted

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5M	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff	4.2.5.2.1. All Permittees shall adopt and implement SOPs or similar type of documents for site inspection and enforcement of post-construction storm water control measures.	Review and customize SOPs for inspection and enforcement of post-construction control measures	Ongoing	LIP	If inspection and enforcement SOPs are current and being utilized?
5N	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	"	4.2.5.2.3. Require private property owner/operators or qualified third parties to conduct maintenance and provide annual certification that adequate maintenance has been performed and the structural controls are operating as designed to protect water quality. In this case, the Permittee must require a maintenance agreement addressing maintenance requirements for any control measures installed on site.	Draft a maintenance agreement template	Completed	BMPIM	If draft is completed
5O	"	"	"	Adopt a maintenance agreement template	Completed	BMPIM	If template is adopted and being used

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5P	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 Staff, Businesses, Residents	4.2.5.4.2 Inspections and any necessary maintenance must be conducted annually by either the Permittee or through a maintenance agreement, the property owner/operator. On sites where the property owner/operator is conducting maintenance, the Permittee shall inspect those storm water control measures at least once every five years, ...	Inventory post-construction BMPs - see 4.2.5.7.1 for inventory inclusion items	Ongoing	BMPIM	If inventory is complete
5Q	"	"	"	Identify who is responsible to inspect and/or maintain each post-construction BMP	Ongoing	BMPIM	If list identifies person responsible for inspections/ maintenance
5R	"	"	"	Develop inspection report form for post-construction BMPs	Ongoing	BMPIM	If form is completed
5S	"	"	"	Conduct inspections annually for city owned BMP's	Ongoing	BMPIM	If completed inspection reports are properly filed
5T	"	"	"	Conduct inspections on privately owned BMP's at least 20% per year	Ongoing	BMPIM	If completed inspection reports are properly filed

MCM	Target		Permit Reference/Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
5U	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli	MS4 staff	4.2.5.6. Permittees shall provide adequate training for all staff involved in post-construction storm water management, planning and review, and inspections and enforcement.	Schedule and conduct training for appropriate personnel	Ongoing	BMPIM	If all appropriate personnel are trained
5V	"	"	4.2.5.5. Maintain an inventory of post construction BMP's	Inventory log updated annually	Ongoing		If log is updated

4.1.2. Ongoing Documentation

Requirement(s):

- Have an ongoing documentation process for implementation of the SWMP to evaluate overall UPDES MS4 permit compliance/non-compliance and evaluate the effectiveness of the SWMP implementation to protect water quality.

Note(s):

- The O&M plan template developed by the applicable USWAC subcommittee has been adopted for use. The template appears to have made the process easier for owners or designees based on an overall reduced comments generated during City plan review.
- The SWMPPA process is considered effective and is required for all new development and redevelopment projects that require an LDP.

MCM 6 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

MCM Regulation: Implement a program for City-owned or operated facilities, operations and structural stormwater controls that includes SOPs, pollution prevention BMPs, Storm Water Pollution Prevention Plans, or a similar type of document, and a training component that have the ultimate goal of preventing or reducing the runoff of pollutants to the MS4 and waters of the state. Include all components of the Pollution Prevention and Good Housekeeping program in the SWMP and identify the department responsible for performing each activity described in this section. Develop an inventory of all such City-owned or operated facilities, and review this inventory annually and update as necessary.

4.2.6.1. Inventory

Requirement(s):

- Develop and keep current a written inventory of all the following potential "high priority" facilities that are owned or operated by the City and all the associated storm water controls, at a minimum. The permitting authority may add additional facilities to the list, as needed.
    - The inventory must include, but is not limited to, the following facilities: 1) composting facilities; 2) equipment storage and maintenance facilities; 3) fuel farms; 4) hazardous waste disposal facilities; 5) hazardous waste handling and transfer facilities; 6) incinerators; 7) landfills; 8) landscape maintenance on municipal property; 9) materials storage yards; 10) pesticide storage facilities; 11) public buildings, including libraries, police stations, fire stations, municipal buildings, restrooms, and similar City-owned or operated buildings; 12) public parking lots; 13) public golf course maintenance facilities; 14) public swimming pool maintenance facilities; 15) public works yards; 16) public marinas or boat launches; 17) recycling facilities; 18) salt storage facilities and de-icing storage facilities; 19) solid waste handling and transfer facilities; 20) street repair and maintenance facilities and/or shed sites; 21) vehicle storage and maintenance yards; 22) airports; 23) animal control facilities; 24) vehicle salvage yards; 25) chemical storage facilities; and 26) transportation hubs, including bus stations.

Implementation:

A written inventory of potential high priority facilities owned or operated by Draper City is maintained. This written inventory includes equipment storage and maintenance facilities, vehicle storage and maintenance facilities, chemical storage facilities, salt storage and de-icing facilities, street repair and maintenance facilities, materials storage yards, municipal buildings and restrooms, dog parks, and public parking lots.

4.2.6.2. Possible Pollutants at Inventoried Facilities

Requirement(s):

- Assess the written inventory of City-owned or operated facilities, operations, and identified storm water controls and make a list of common pollutants that may originate from these

facilities and how to prevent them from entering the storm water system. A description of the assessment process and findings must be included in the SWMP document.

Implementation:

The facilities identified in 4.2.6.1. and their associated stormwater controls are assessed to identify operations, maintenance activities, and materials that may generate pollutants and potentially discharge to the stormwater system. The assessment considers proximity to a water of the state, facility operations, maintenance activities, as well as the need for material storage and handling practices and housekeeping procedures.

Potential pollutants associated with these facilities include total dissolved solids from sources such as salt; E. coli from sources such as pet waste; phosphorus and nitrate from sources such as organic matter debris; selenium from sources such as sediment; and other common pollutants, including oils, vehicle fluids, metals, chemicals, cleaning products, trash, debris, and de-icing materials.

To prevent these pollutants from entering the stormwater system, Draper City implements appropriate stormwater controls and pollution prevention practices. These measures include sediment controls, such as custom-built storm drain inlet protection devices, and operational BMPs, including proper material storage and containment, spill prevention and response procedures, monthly facility inspections, good housekeeping practices, equipment and maintenance controls, pet waste stations and associated signage, and proper management of salt and deicing materials.

4.2.6.3.(1.-2.) Identification of "High Priority" Facilities

Requirement(s):

- Based on the assessment required in 4.2.6.2, identify as "high priority" those facilities or operations that have: 1) pollutants stored at the site; 2) improperly stored materials; 3) potential pollutant-generating activities performed outside, e.g. changing automotive fluids; 4) close proximity to fresh water and water bodies, including but not limited, to streams, canals, rivers, ponds and lakes; or 5) potential to discharge pollutant(s) of concern to impaired water(s). Include a description of the assessment process and findings in the SWMP.
    - Implement water quality control measures and BMPs at all "high priority" sites designed to target the specific pollutants generated onsite, and/or the pollutants associated with the impaired waters. Monitor the control measures and BMPs regularly to verify that the BMPs are functioning. Control measures, BMPs, and monitoring schedules must be specified in the SWMP.
    - Update the SWMP to include a list of "high priority" facilities according to 4.2.6.3 and prepare a SWPPP for each "high priority" facility within 180 days from the effective date of this Permit. Implement a SWPPP at each "high priority" facility that outlines measures to prevent pollutants from entering the storm drain system and contains an inspection.
        - Include the following information in each SWPPP: 1) facility address; 2) staff/contact information for the facility; 3) property boundaries; 4) buildings and impervious surfaces; 5) directions of storm water flow using arrows; 6) locations of structural control measures; 7) facility BMPs (non structural); 8) location and name of the nearest defined drainage(s) which could receive runoff from the facility, whether it contains water or not; 9) locations of all

	storm water conveyances including ditches, pipes, basins, inlets, and swales; 10) locations where significant spills or leaks have occurred; 11) locations of all visual stormwater monitoring points; 12) locations of storm water inlets and outfalls, with a unique identification code for each outfall and an approximate outline of the areas draining to each outfall; 13) locations of all non-storm water discharges; 14) locations of sources of run-on to the site from adjacent properties; and 15) locations where on-site activities may be exposed to storm water, including, but not limited to fixed fueling operations; vehicle and equipment maintenance and/or cleaning areas; brine making areas; loading/unloading areas; waste storage or disposal areas; liquid storage tanks; process and equipment operating areas; and materials storage or disposal areas.

Implementation:

Based on the assessment in 4.2.6.3., the Draper City Public Works Facility and the Galena Parks Facility have been identified as high priority facilities.

The Draper City Public Works Facility is designated as a high priority facility due to pollutants stored at the site and the potential pollutant-generating activities performed outside. Activities and materials at this facility include vehicle maintenance operations, de-icing operations, snow plow vehicle storage, salt storage, and chemical storage. A SWPPP has been developed for this facility.

The Galena Parks Facility is designated as a high priority facility due to pollutants stored at the site. Pollutants and potential pollutant sources include chemical storage, a dog park, multiple trash containment devices, and seasonal placement of multiple portable toilets.

4.2.6.4.(1.-3.) High Priority Facility Inspections

Requirement(s):

- The following inspections must be conducted at “high priority” City-owned or operated facilities:
    - Perform monthly visual inspections of “high priority” facilities and related stormwater outfalls in accordance with the developed SOPs to verify and correct the performance of the BMPs and all other systems designed and placed to eliminate pollutant discharges. Track the monthly inspections in a log for every facility, and keep or reference the location of the inspection records within the facility’s SWPPP. The inspection log should also include any identified deficiencies and the corrective actions taken to fix the deficiencies.
    - Perform a comprehensive inspection of “high priority” facilities, including all stormwater controls, at least twice per year. The semi-annual inspection shall specifically review and correct issues found with: 1) waste storage areas; dumpsters; vehicle and equipment maintenance/fueling areas; material handling areas and similar pollutant-generating areas; 2) previous monthly or annual inspections conducted at the facility; 3) and the facility’s SWPPP. Document the semi-annual inspections on an inspection report and keep or reference the location of the inspection records within the facility’s SWPPP. The semi-annual inspection must be

done in accordance with the inspection SOPs. An inspection report must also include any identified deficiencies and the corrective actions taken to remedy the deficiencies

- Visually observe the quality of the storm water discharges from the "high priority" facilities at least once per year. Remedy any observed problems (e.g., color, foam, sheen, turbidity) that can be associated with pollutant sources or controls as soon as practicable, but at a minimum, before the next storm event, to prevent discharge to the storm drain system. Document visual observations on an inspection report and keep or reference the location of the records of the visual observations within the facility's SWPPP. This inspection must be done in accordance with the inspection SOPs. The inspection report must also include any identified deficiencies and the corrective actions taken to remedy the deficiencies.

Implementation:

Monthly visual inspections, semi-annual comprehensive inspections, and annual visual observations of storm water discharges are conducted in accordance with the associated SOPs at all identified high priority facilities. These inspections are documented, using an electronic inspection form that includes photos and comments, and are distributed to appropriate personnel who can take corrective action.

High priority facility inspection SOPs are established, and records of all inspections and observations are maintained within the City's electronic filing system.

4.2.6.5.(1.-6.) Operations and Maintenance SOPs

Requirement(s):

- Develop and implement SOPs to protect water quality at each of the facilities owned or operated by the City and/or activities conducted by the City including, but not limited to: 1) buildings and facilities; 2) material storage areas; 3) heavy equipment storage areas and maintenance areas; 4) parks and open spaces; 5) vehicle and equipment; 6) roads, highways, and parking lots; and 7) storm water collection and conveyance systems.
    - SOPs must address the following practices to ensure they are protective of water quality: 1) use, storage and disposal of chemicals; 2) storage of salt, sand, gravel, landscaping materials, asphalt and other materials; 3) waste and trash management; 4) cleaning, washing, painting and maintenance activities including: cleaning of maintenance equipment, building exteriors, and trash containers; 5) sweeping roads and parking lots; 6) proper application, storage, and disposal of fertilizer, pesticides, and herbicides and minimizing their use; 7) lawn maintenance and landscaping activities including: proper disposal of lawn clipping and vegetation; 8) green waste deposited in the street; 9) proper disposal of pet wastes; 10) vehicle maintenance and repair activities, including use of drip pans and absorbents under or around leaky vehicles and equipment; 11) vehicle/equipment storage including storing indoors where feasible; 12) vehicle fueling including placing fueling areas under cover in order to minimize exposure, where feasible; 13) road and parking lot maintenance, including: pothole repair, pavement marking, sealing, and repaving; 14) cold weather operations, including plowing; sanding; application of deicing compounds; and maintenance of snow disposal areas; 15) right-of-way maintenance, including mowing; herbicide and pesticide application; 16) City-sponsored events such as large outdoor festivals, parades, or street fairs and the clean-up following these events; 17)

regular inspection, cleaning, and repair of storm water conveyance and structural storm water controls; 18) graffiti removal; and 19) any activities or operations not listed in this Part that would reasonably be expected to discharge contaminated runoff.

- Develop SOPs that include a schedule for City owned road and parking lot sweeping and storm drain system maintenance, including priority areas. The SOPs must include regular inspection, cleaning, and repair of catch basins, storm water conveyance pipes, ditches and irrigation canals, culverts, structural storm water controls, and structural runoff treatment and/or flow control facilities. Prioritize sweeping and storm sewer system maintenance, with the highest priority areas being maintained at the greatest frequency. Priority areas must be identified considering the following factors: 1) water quality concerns; 2) most recent assessment the receiving water; 3) the amount and type of material that typically accumulates in an area; or 4) other location-specific factors.
- Ensure and document proper disposal methods of all waste and wastewater removed during cleaning and maintenance of the storm water conveyance system. These disposal methods apply to, but are not limited to, street sweeping and catch basin cleaning. The materials removed from the MS4 must be dewatered in a contained area and discharged or disposed of in accordance with federal, state and local laws. Prior to disposal, the materials must be stored properly to avoid discharge during a storm event. Any other treatment and disposal measures that could impact waters of the state must be reviewed and approved by the permitting authority.
- Ensure that vehicle, equipment, and other wash waters are not discharged to the MS4 or waters of the state.
- Minimize discharges to waters of the state that are associated with snow disposal and melt.
- Develop a spill prevention plan in coordination with the local fire department.

Implementation:

Draper City MS4 operation SOPs are established, including:

- Annual Stormwater System Inspections
- Dumpsters & Garbage Storage
- Parking Lot Maintenance
- Catch Basin Cleaning
- Chemical Handing & Transporting and Spill Response
- Chip Seal
- Crack Seal
- Curb & Pavement Markings
- Detention Pond Cleaning
- Ditch Management
- Mowing and Trimming
- New & Replacement Concrete Work
- Open Space Management
- Overlays and Patching

- Planting Vegetation – Seeds
- Planting Vegetation – Starters
- Shouldering and Moving
- Slurry Seal
- Snow Removal and De-Icing
- Storm Drain Pipe Cleaning
- Street Sweeping
- Transporting Dry Excavated Materials & Spoils
- Transporting Equipment
- Transporting Soil and Gravel
- Transporting Wet Excavated Materials & Spoils
- Fueling
- Vehicle and Equipment Storage
- Vehicle Washing
- Portable Sanitary Facilities

4.2.6.6. Floor Drain Inventory

Requirement(s):

- Maintain an inventory of all floor drains inside all City-owned or operated buildings. Ensure that all floor drains discharge to appropriate locations. The inventory must be updated as necessary to ensure accuracy.

Implementation:

A written inventory of floor drains inside City-owned or operated buildings is maintained and updated as necessary.

4.2.6.7. Outside Contracting

Requirement(s):

- Ensure, through contractually-required documentation and/or periodic site visits, that contractors performing operation and maintenance activities for the City are using appropriate storm water controls and following the SOPs, storm water control measures, and good housekeeping practices of the City.

Implementation:

Either the Draper City Storm Water Specialist or the Storm Water Compliance Inspector, both responsible for MCM 3 oversight inspections, conducts periodic inspections of Capital Improvement Program (CIP) projects to verify general construction stormwater compliance. If general construction stormwater non-compliance is identified/observed, the City construction stormwater inspector will contact the Draper City project manager and/or the contractor site contact to notify them of the issue and the scheduled re-inspection, with all inspection findings, actions, and communications documented.

4.2.6.8.(1.) Flood Management Controls Assessment

Requirement(s):

- Develop and implement a process to assess the water quality impacts and the design of all new flood management structural controls that are owned or operated by the City or that discharge to the City. This process shall include consideration of controls that can be used to minimize the impacts to site water quality and hydrology while still meeting project objectives. Include a description of this process in the SWMP.
    - Assess existing flood management structural controls to determine whether changes or additions are necessary to improve water quality. A description of this process and any changes or additions made must be included in the SWMP.

Implementation:

The Draper City Drainage Design Criteria was adopted in October 2012 and includes specific criteria for use in the design of stormwater facilities. They are presented in two sections: Hydrologic Criteria and Design Criteria. Hydrologic Criteria includes precipitation, drainage design frequency, design storm distribution and duration, and the storm drainage modeling method. Design criteria includes street drainage, storm inlets, storm drains, stormwater quantity control facilities, and easements.

4.2.6.9. Retrofit Plan

Requirement(s):

- Develop a plan to retrofit existing developed sites that the City owns or operates that are adversely impacting water quality. The retrofit plan must be developed to emphasize controls that infiltrate, have evapotranspiration, or harvest and use, storm water discharges.
- The retrofit plan must include a ranking of retrofit sites based on the following criteria: 1) proximity to a waterbody; 2) current assessment of the waterbody with the goal to improve impaired waterbodies and protect unimpaired waterbodies; 3) hydrologic condition of the receiving waterbody; 4) proximity to a sensitive ecosystem or protected area; and 5) any sites that could be further enhanced by retrofitting storm water controls.

Implementation:

A basic retrofit plan for City-owned or operated facilities, with sites prioritized based on the criteria specified in the permit requirement, has been drafted.

4.2.6.10.(1.-3.) Training

Requirement(s):

- Require that all employees and other responsible entities that have job functions that may impact storm water quality receive training as follows:
    - Ensure that new hires are trained within 60 days of hire and annually thereafter, at a minimum. Follow-up training must be provided as needed to address changes in procedures, methods, or staffing.
    - Include topics relating to the City's Pollution Prevention and Good-Housekeeping program, including: 1) the importance of protecting water quality; 2) the requirements of Part 4.2.6; 3) inspection and follow-up procedures; 4) ways to prevent or minimize impacts to water quality by how they perform their job activities;

5) SOPs for operation and maintenance activities; 6) SWPPPs for the "high priority" facilities; and 7) the City's prohibition against illicit discharges and improper disposal of waste including the City's procedures for reporting water quality concerns and potential illicit discharges. Training shall focus on the topics most relevant to the employee's position to ensure protection of water quality.
    - Keep and maintain annual and new hire training records that include dates, activities or course descriptions, and names and positions of staff in attendance.

Implementation:

Training is given to applicable new hires within 60 days, and annual training is given to all applicable staff. Records of all training activities are maintained within the City's electronic filing system.

4.1.3.(1.) Best Management Practices

Requirement(s):

- Include BMPS to be implemented for each of the six MCMs.
    - Provide measurable goals for each of the BMPs which include, at a minimum, the months and years in which Draper City will undertake required actions, including: interim milestones and the frequency of the actions, if applicable.

Implementation:

BMP	Code
Housekeeping Processes	HP
Infrastructure Planning	IPL
Employee Training	ET

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6A	All pollutants	MS4 staff	4.2.6. All components of an O & M program shall be included in the SWMP document and must identify the department (and where appropriate, the specific staff) responsible for performing each activity described in this section…	Complete Org chart annually and define specific responsibilities for all departments shown	Ongoing	HP	If org chart is complete and up to date
6B	"	“	4.2.6.1. Permittees shall develop and keep current a written inventory of all potential high priority City-owned or operated facilities	Complete listing of potential high priority City owned/operated facilities and review it annually	Ongoing	HP	If list is completed
6C	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, Heavy Metals, trash	MS4 Staff	4.2.6.2. All Permittees must initially assess the written inventory of Permittee-owned or operated facilities, operations and storm water controls identified in Part 4.2.6.1. for their potential to discharge to storm water the following typical urban pollutants:	Complete assessments and identify "high priority" facilities.	Ongoing	HP	If assessments are completed and documentation recorded in SWMP
6D	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, Heavy Metals, trash	MS4 Staff	4.2.6.4. Each “high priority” facility identified in Part 4.2.6.3. must develop a SWPPP	Develop, review, and implement SWPPPs at high priority facilities	Ongoing	HP	If a SWPPP is implemented and reviewed annually

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6E	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, Heavy Metals, trash	MS4 Staff	4.2.6.5.2. SOPs and schedule for regular inspection, cleaning, and repair of catch basins, storm water conveyance pipes, ditches and irrigation canals, culverts structural storm water controls, and structural runoff treatment and/or flow control facilities.	Review, customize and update appropriate SOPs. Inspect/repair/maintain detention basins annually	Ongoing	HP	If SOPs are updated, inspections completed of all detention basin structures
6F	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, trash	MS4 Staff	4.2.6.4.1. Monthly visual inspections: The Permittee must perform weekly visual inspections of “high priority” facilities in accordance with the developed SOPs to minimize the potential for pollutant discharge.	Develop monthly inspection form and log	Completed	HP	Completed inspection form and log
6G	"	"	"	Conduct monthly inspections	Ongoing	HP	If at annual review all monthly inspections are logged and reports completed
6H	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, trash	MS4 Staff	4.2.6.4.2 Semiannual comprehensive inspections: At least twice per year, a comprehensive inspection of “high priority” facilities, including all storm water controls, must be performed	Develop semiannual inspection form(s) and log	Completed	HP	Completed inspection form and log

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6I	"	"	"	Conduct semiannual comprehensive inspections	Ongoing	HP	If at annual review all semiannual inspections are logged and reports completed
6J	Sediment, Hydrocarbons, Organic Matter TDS, TSS, E. coli, pH, trash	MS4 Staff	4.2.6.4.3 Annual visual observation of storm water discharges: At least once per quarter, the Permittee must visually observe the quality of the storm water discharges from the “high priority” facilities	Conduct annual visual observations of storm water discharges at high priority facilities	Ongoing	HP	If at annual review all annual visual monitoring is completed and logged and reports completed
6K	Sediment, Hydrocarbons, TDS, TSS, E. coli,	MS4 Staff, Contractors and Developers	4.2.6.8. The Permittee must develop and implement a process to assess the water quality impacts in the design of all new flood management structural controls that are associated with the Permittee or that discharge to the MS4.	Draft a policy/process to assess water quality impacts on all new flood control projects	Ongoing	IPL	If draft is prepared and ready for internal review process
6L	"	"	"	Get policy approved	Complete	IPL	If policy is approved and adopted
6M	Sediment, Hydrocarbons, TDS, TSS, E. coli,	MS4 staff	4.2.6.8.1 Existing flood management structural controls must be assessed to determine whether changes or additions should be made to improve water quality.	See MCM 5 for goals (part of the retrofit program)	Ongoing		

MCM	Target		Desired Result	Measurable Goal	Milestone	Assoc.	Measure of Success (Effectiveness)
	Pollutant(s)	Audience(s)			Date	BMP	
6N	Sediment, Hydrocarbons, TDS, TSS, E. coli,	MS4 Staff	4.2.6.10. Permittees shall provide training for all employees who have primary construction, operation, or maintenance job functions that are likely to impact storm water quality.	See individual training goals within other MCMs	Ongoing		
6O	"	"	"	Develop a training schedule	Ongoing	ET, HP	If schedule is complete
6P	"	"	"	Conduct ongoing training according to schedule	Ongoing	ET, HP	If training is completed and documented according to schedule at annual evaluation

4.1.2. Ongoing Documentation

Requirement(s):

- Have an ongoing documentation process for implementation of the SWMP to evaluate overall UPDES MS4 permit compliance/non-compliance and evaluate the effectiveness of the SWMP implementation to protect water quality.

Note(s):

- 4.2.6.3.(1.-2.) – Galena Hills Park Facility is identified as high priority facility, and all MS4-required inspections are being conducted as necessary. Development of the facility's SWPPP is anticipated to be completed in early 2027.
- 4.2.6.7. – The City currently meets this requirement through periodic site inspection conducted by the City construction stormwater inspector. To further strengthen construction stormwater practices, The City plans to develop outside-contractor SOPs addressing construction dewatering requirements, dust control requirements, track-out prevention and/or reduction, street sweeping, washout and wastewater containment, trash containment, stockpile management, inlet protection, perimeter controls, and on-site fuel storage. These SOPs will be reviewed and incorporated into the CIP project documentation provided to contractors.
- 4.2.6.9. – A basic retrofit plan for City-owned or operated facilities has been drafted, with sites prioritized based on the criteria specified in the permit requirement. As a continued step toward enhancing this program, evaluation of a comprehensive retrofit plan for existing sites is anticipated in 2027, with plan development expected to follow in 2028.