



# PROGRAM DESCRIPTION DOCUMENT

[CDPS PERMIT COS000004](#)

09/01/2022 – 08/31/2027

[Permit Term 4 – Modification 1](#)

Updated 09/28/2023

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## Program Description Document

The MS4 permit defines the Permit Description Document (PDD) as a document that describes how the permittee will meet the requirements of the permit and includes a list of citations for documents and electronic records used to comply with the permit requirements; and an organizational chart.

### I.C.1 Program Description Document Development and Maintenance

Per the MS4 Permit issued July 29, 2022, effective September 1, 2022, the permittee must develop and maintain records in the form of a PDD. Requirements subject to a compliance schedule do not need to be addressed in the PDD until the due date in the compliance schedule in Part I.H of the permit.

Per the permit fact sheet, the PDD is a singular document that contains the previous permit's stormwater management plans and references, in addition to any updates required by the renewal permit. The information in the PDD is not the same as information required in the recordkeeping sections of the renewal permit. The recordkeeping sections address written documentation of the activities in the PDD that have been completed. The fact sheet goes on to state that the PDD organizes what control measures will be/are being implemented, determines appropriate funding and staff needs, and training necessary for new staff on all of the different elements of the stormwater program to help with consistency. Additionally, the PDD must be maintained to be up-to-date and document the current implementation of each control measure.

### I.D Public Involvement/Participation

Control Measure Implementation and Procedures:

Public Notice Requirements		Status		
The MS4 permit requires us to follow our own public notice procedures. SWENT has no public notice procedures for updating program documents.		Complete		
SWENT must provide a mechanism and processes to allow the public to review and provide input on the PDD. At a minimum, the current PDDs must be available on the website. PDDs available to the public must reflect all updates made prior to the previous 30 days. SWENT must also provide a statement on the City's web site that the PDD is publicly available for review.		Complete		
SWENT is required to have the ability to accept and respond to information submitted by the public, including information on illicit discharges or failure to implement or meet control measure requirements associated with covered construction activities, applicable development projects, or City operations. This is achieved through Accela and GoCOS.		Complete		
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>– Maintain copies of the documents used to provide public notice and any public comment received as part of the public notice process.                             <ul style="list-style-type: none"> <li>▪ Documents are on the website.</li> </ul> </li> <li>– Maintain documentation of the mechanism used to allow the public to provide input and any comments received.</li> <li>– SWENT must maintain records of information submitted by the public and actions SWENT took to address the information.                             <ul style="list-style-type: none"> <li>▪ This is typically documented through Cartegraph and GoCOS.</li> </ul> </li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
All sections of the permit	Update PDD to comply with permit requirements	AR, 2024	02/28/2023	02/28/2023

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
PDD	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit</a>	SWENT	02/28/2023
PDD	O:\Storm_General\MS4 Permit\Program Description Documents	SWENT	Ongoing

## I.E.1 Public Education and Outreach (E&O) Program

As of the writing of this PDD, the E&O program does not have a dedicated program plan. This section of the PDD will focus on detailed guidance to ensure permit compliance is accomplished.

In addition to the requirements in the checklist below, SWENT must comply with recordkeeping requirements.

Website Checklist		Status		
A copy of the MS4 permit or a link to CDPHE's webpage including directions for finding the permit.				
A copy if the permit can be found at this public link: <a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301</a>				02/22/2023
Contact information and directions for comments, questions, and complaints associated with a statement explaining that the City must meet the permit requirements				
Available through this public link: <a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301</a>				02/22/2023
A basic message explaining that stormwater discharges to surface water bodies without undergoing treatment by a wastewater treatment plant. The message must include a diagram illustrating that stormwater does not go to a wastewater treatment plant.				
Available through this public link: <a href="https://coloradosprings.gov/forcleanwaterways?mlid=6061">https://coloradosprings.gov/forcleanwaterways?mlid=6061</a>				Previous Term
Identification of common indicators of an illicit discharge and procedures on how to report an illicit discharge.				
Available through this public link: <a href="https://coloradosprings.gov/stormwater-enterprise/page/illicit-discharge?mlid=6331">https://coloradosprings.gov/stormwater-enterprise/page/illicit-discharge?mlid=6331</a>				Previous Term
A summary of SWENT's requirements for control measures for covered construction projects.				
This exists in the Stormwater Criteria Manual: <a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291</a>				Previous Term
A summary of how to provide information to SWENT regarding failures to implement the terms of this permit.				
Available through this public link: <a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301</a>				02/22/2023
<b>Recordkeeping Requirements</b>				
– Maintain the website				Ongoing
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.1.a.i, I.I.1.b.i	Complete all applicable changes to website	AR, 2024	02/28/2023	02/22/2023

Illicit Discharge Business Outreach		Status		
Determine & target business types that are likely to <i>cause an illicit discharge</i> or are likely to <i>dispose of waste improperly</i> .				Complete
Identify <i>at least</i> one type of business to target and develop a list of names & locations of the targeted business type.				Complete
Develop & implement at least one E&O activity for targeted businesses. The material/activity must describe water quality impacts due to illicit discharges & improper disposal of waste, behaviors of concern, and actions businesses can take to reduce the likelihood of illicit discharges & the improper disposal of waste. These activities can count toward the E&O Activities Table 1 in the permit.				Complete
<b>Recordkeeping Requirements</b>				
<ul style="list-style-type: none"> <li>– Maintain a written list of the targeted businesses and the distribution mechanism.</li> <li>– Type of material provided, dates of events, and dates of the activities.</li> <li>– Documentation of activities along with dates of distribution and location of signs and markers.</li> </ul>				
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.1.a.ii(A), I.E.1.b.ii	Update the education and outreach program regarding business illicit discharges.	AR, 2024	08/31/2023	08/29/2023

Nutrients Outreach					Status
Develop a program to evaluate, identify, target, and provide outreach that addresses phosphorous and nitrogen sources state-wide or within the specific region or watershed. This goal can be met through collaboration with other entities.					Complete
For both nitrogen and phosphorus, we must determine the targeted sources (e.g., residential, industrial, agricultural, or commercial) that are contributing to, or have the potential to contribute to the discharge of nitrogen and phosphorus to the receiving waters authorized under the MS4 permit.					Ongoing
Prioritize and determine which targeted sources are likely to obtain a reduction in nitrogen and phosphorus discharges through education and outreach.					Ongoing
Distribute educational materials or give workshops, or equivalent outreach, to the targeted sources. The E&O materials or outreach must describe stormwater quality impacts associated with nitrogen and phosphorous in stormwater runoff & illicit discharges, behaviors of concern, and actions to reduce nutrients. Examples include responsible fertilizer application, encouraging xeriscaping, proper disposal of leaves and lawn waste, & evaluating alternatives to deicers containing phosphorous.					Ongoing
We must evaluate the estimated effectiveness of the outreach (estimated reduction in fertilizer application, number of new feet of xeriscaping, quantity of leaves collected, etc.)					Ongoing
Recordkeeping Requirements					
<ul style="list-style-type: none"> <li>– Must keep a written list of the targeted sources that are contributing to, or have the potential to contribute nutrients to stormwater.</li> <li>– Document the E&amp;O activity conducted for the nitrogen &amp; phosphorous sources.</li> <li>– Document the metrics used to evaluate the behavior change.</li> </ul>					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.1.a.iv, I.E.1.b.iv	Develop and implement an education and outreach program regarding nutrients.	AR, 2024	08/31/2023	08/31/2023	

Education and Activities					Status
Each year at least 4 of the E&O activities in Table 1: Education and Outreach Activities Table must be completed.					Ongoing
At least 2 activities must be from the Active Outreach Column.					Ongoing
At least 1 Active Outreach activity must address the proper management and disposal of used oil and toxic materials.					Ongoing
(Note where the Illicit Discharge Outreach fits in with the above requirements)					
(Note where the Nutrients Outreach fits in with the above requirements)					
(Note when the OWTS mailers are sent out to count towards this requirement)					
Recordkeeping Requirements					
<ul style="list-style-type: none"> <li>– Document dates the events/activities were implemented, &amp; the materials that were made available.</li> <li>– Documentation of activities along with dates of distribution and location of signs and markers.</li> </ul>					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.1.a.iii, I.E.1.b.iii	Update the education and outreach program to meet the minimum requirements of the permit for E&O Activities in Table 1.	AR, 2024	08/31/2023	Ongoing	



Onsite Wastewater Treatment Systems (OWTS)				Status
Determine the priority OWTS within the MS4 that <i>may</i> have a higher potential to contribute to an illicit discharge. This may include locations that have failed in the past, areas with no maintenance, poor soils, high groundwater, etc.				
Identify the locations, including latitude and longitude and distance from the MS4, and property owner mailing addresses of the OWTS within the MS4 permit area.				
At least once every five years, we must develop and implement one education and outreach activity targeting property owners identified above. We may coordinate with El Paso County.				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>- Maintain a list of the OWTS locations</li> <li>- Document dates the events/activities were implemented, &amp; the materials that were made available.</li> <li>- Documentation of activities along with dates of distribution and location of signs and markers.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.1.a.ii(B), I.E.1.b.ii	Develop and implement the education and outreach program regarding OWTS illicit discharges.	AR, 2028	08/31/2027	

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
E&O Program Plan	O:\Storm_General\E&O	SWENT	09/13/2023

## I.E.2 Illicit Discharge Detection and Elimination Program

The Illicit Discharge Detection and Elimination Program has detailed procedures for both permit compliance and public health and safety detailed in The Illicit Discharge Detection and Elimination (IDDE) Program Plan. All procedures should be referenced through the IDDE Program Plan.

To ensure permit compliance the below checklist will outline permit requirements:

Storm Sewer Map				Status
Must maintain a current map of the location of all MS4 outfalls within the permit implementation area with the names and locations of all state waters that receive discharges from those outfalls, and open channel conveyances (swales, ditches, concrete channels, etc.), interconnections with other MS4s and storm sewer systems.				
This began during previous permit requirements. The outfalls are updated annually as new infrastructure comes online. The GIS team updated the open channels and conveyances in January of 2023.				Ongoing
Recordkeeping Requirements				
– Maintain the map				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.i, I.E.2.b.i	Update IDDE storm sewer map to include MS4 open channel conveyances.	AR, 2024	02/28/2023	01/27/2023

Tracing and Illicit Discharge				Status
Update procedures for tracing an illicit discharge to be in compliance with new permit requirements: New requirements include identifying unpermitted discharges of groundwater that may not meet water quality standards				Complete
Recordkeeping Requirements				
– Document the applicable program documents and procedures used to respond to reports or identification of illicit discharges.				
– Maintain a centralized recordkeeping system of illicit discharge responses conducted by SWENT. Records maintained by other departments can be in different centralized recordkeeping systems. The centralized record keeping system must contain the information in the Removal of Illicit Discharges record keeping section or provide a reference to where the information is maintained and how information is shared between separate functional groups within the City's organization.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.iv, I.E.2.b.iv	Tracing an ID: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	05/03/2023

Removal of an Illicit Discharge				Status
Update removal of illicit discharge procedures in the IDDE Program Plan. Changes to IDDE Program Plan include notifying CDPHE when a permit holder has an illicit discharge.				Complete
Recordkeeping Requirements				
SWENT must document and maintain records of each illicit discharge identified by the inspector that includes the following information, or identifies that the information is unknown or not applicable:				
<ul style="list-style-type: none"> <li>– The date that the illicit discharge was reported to and/or identified by SWENT.</li> <li>– The date SWENT responded to the reported or identified illicit discharge.</li> <li>– The location of the illicit discharge.</li> <li>– Potential responsible party for the illicit discharge (if identified).</li> <li>– A description of the source and nature of the illicit discharge.</li> <li>– A description of how the source of the illicit discharge was eliminated or resolved.</li> <li>– Documentation of enforcement actions (if applicable).</li> </ul>				
Compliance Schedule				

Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.vi, I.E.2.b.vi	Removing an Illicit Discharge: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	05/03/2023

Industrial Activities/Discharges				Status
Revise IDDE Program Plan to include industrial facilities that hold a permit with the State & have an illicit discharge. Language must include notifying CDPHE via email or mail as soon as possible but no later than 90 days from the identification of an illicit discharge				Complete
Recordkeeping Requirements				
– Must maintain copies of illicit discharge reports and the date that CDPHE was notified by SWENT that the discharges originated from a permitted or unpermitted industrial activities for which CDPS or NPDES permit coverage is available.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.x, I.E.2.b.x	Industrial Activities: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	05/03/2023

Regulatory Mechanisms				Status
Implement regulatory mechanisms to include the following: Prohibit illicit discharges into the MS4.				Previous Term
Allow access to property, as necessary for SWENT to implement the illicit discharges procedures.				Previous Term
Provide SWENT the legal ability to meet the permit requirements to remove, or require and ensure the removal of, and impose penalties for all illicit discharges for the period from when the illicit discharge is identified until removed.				Previous Term
Review regulatory exemptions and ensure that exclusions, exemptions, waivers, & variances are in compliance with permit requirements.				In Process
Recordkeeping Requirements				
– Maintain the applicable specifications, contracts, standards, operating procedures, and other documents used to meet the permit requirements.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.ii, I.E.2.b.ii	Complete all applicable changes to the regulatory mechanism(s): Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	
I.E.2.a.iii, I.E.2.b.iii	Analyze all regulatory mechanism exemptions: Ensure that any exemptions meet the requirements of the permit and revise the regulatory mechanism as necessary.	AR, 2025	08/31/2024	

Enforcement Response				Status
Review Enforcement Response Procedures to make sure they are in compliance with new permit requirements. Ensure similar violations should be responded to in a uniform, consistent manner and enforcement procedures should be transparent.				
Review code, we must prohibit illicit discharges and must have the ability to enforce against them immediately.				
Recordkeeping Requirements				
– Maintain the applicable codes, resolutions, ordinances, and program documents used to meet the permit requirements.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.vii, I.E.2.b.vii	Enforcement Response: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

Priority Areas				Status
Locate priority areas with a higher likelihood of having illicit discharges or illicit connections. At a minimum this must include areas with a history of past illicit discharges, illegal dumping, or include the outfalls of concern.				
Recordkeeping Requirements				
– Maintain the map and/or list of priority areas.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.viii, I.E.2.b.viii	Priority Areas: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

Allowable Discharges				Status
Update the allowable discharges in City code in relation to the new permit requirements in section I.E.2.a.v sections A – V. Revise language to include dechlorinated swimming pool... discharges, dye testing, stormwater runoff with incidental pollutants, agricultural stormwater runoff, discharges in accordance with CDPHE's Low Risk Discharge guidance.				
Recordkeeping Requirements				
– Maintain the applicable specifications, contracts, standards, operating procedures, and other documents used to meet the permit requirements.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.v, I.E.2.b.v	Discharges that could be Excluded from being Effectively Prohibited: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2026	08/31/2025	

Training				Status
Train municipal staff, including fire department and police department, to recognize and appropriately respond to illicit discharges observed during typical duties. Revise training to include the police department and make any updates necessary				
Recordkeeping Requirements				
– Maintain a list of staff positions and departments that must be trained and the frequency of training. – Maintain program documents that describe how and when new employees will be trained. – Maintain the name and title of each individual trained, date of training, the type of training, and a list of topics covered.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.ix, I.E.2.b.ix	Training: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2026	08/31/2025	

Sanitary Sewer Seepage				Status
Revise IDDE Program Plan to include Control of Sanitary Sewer Seepage into the MS4. This is conducted via Colorado Springs Utilities. A detailed account of the process and how it aligns with the permit requirement to monitor all 1,700 miles of sanitary sewer lines once every 5 years, minus lines that were repaired within the last 15 years or lines that were installed within the last 15 years or within the permit term.				
Recordkeeping Requirements				
– Must maintain the applicable program documents and procedures used to detect and eliminate sources of sanitary sewer seepage into the MS4. – Must document the miles of sanitary sewer lines monitored and the actions taken each year				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized

I.E.2.a.xi, I.E.2.b.xi	Control of Sanitary Sewer Seepage into the MS4: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2028	08/31/2027	
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Dry Weather Outfall Screening and Monitoring				Completed
This section of the permit has been built into the 2022 Monitoring Plan. As this is a new permit requirement, all aspects of the plan have been developed in compliance with the Permit Term 4 permit.				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>- Must maintain the applicable program documents and procedures used to screen outfalls during dry weather.</li> <li>- Must document the outfalls screened and the actions (if applicable) taken each year.</li> <li>- Must document the results from the source investigation and monitoring, if applicable.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.2.a.xii, I.E.2.a.xii	Dry Weather Outfall Screening and Monitoring: Year 1-2: Develop procedures to create the program; revise documentation as necessary.	AR, 2025	08/31/2024	
I.E.2.a.xii, I.E.2.a.xii	Dry Weather Outfall Screening and Monitoring: Year 3-5: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2028	08/31/2027	

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
IDDE Program Plan_2022	O:\Storm_Permit\Spill_Investigation\Guidance\IDDE Program Documents	SWENT	Rev. 01/2023
2022 Monitoring Plan_Draft	O:\Storm_General\Water Quality Monitoring	SWENT	10/25/2022
1_Spill Investigation SOP	O:\Storm_Permit\Spill_Investigation\SOPs	SWENT	01/30/2018
2.1_Cartegraph Desktop Tracking SOP	O:\Storm_Permit\Spill_Investigation\SOPs	SWENT	07/06/2018
2.2_Cartegraph App Tracking SOP	O:\Storm_Permit\Spill_Investigation\SOPs	SWENT	07/2018
2.3_Retrieving Spill Reports from Cartegraph SOP	O:\Storm_Permit\Spill_Investigation\SOPs	SWENT	10/2018
3_ID Water Quality Monitoring SOP	O:\Storm_Permit\Spill_Investigation\SOPs	SWENT	Rev.02/2019
4_After Hours Spill Response SOP	O:\Storm_Permit\Spill_Investigation\SOPs	SWENT	03/2018
5_Emergency & HAZMAT Spill Response SOP	O:\Storm_Permit\Spill_Investigation\SOPs	SWENT	In Progress

## I.E.3 Construction Sites Program

Per section I.E.3 of the MS4 permit, the permittee (SWENT) must implement a program to reduce or prevent the discharge of pollutants to the MS4 from public and private construction activities that result in a land disturbance of greater than or equal to one acre or for construction activity disturbing less than one acre if it is part of a larger common plan of development or sale that would disturb one acre or more. The permittee must implement a program to require structural control measures and/or non-structural control measures that effectively minimize erosion, sediment transport, and the release of other pollutants related to construction activity. The requirements for construction activity does not apply to those activities that meet the definition of routine surface maintenance.

As listed in the Current Control Measure Implementation and Procedure Documents and Electronic Records section below, there are extensive procedures and documents related to implementing the construction sites program. For this reason, this section of the PDD will focus on the sections relating to the recordkeeping requirements and the compliance schedule.

Regulatory Mechanism		Status		
Must include the following: The ability to implement sanctions against entities responsible for applicable construction activities.		Complete		
For public projects, implement, at a minimum, contract provisions, internal processes and internal management procedures.		Complete		
Require control measures to be implemented for all applicable construction activities from initial disturbance until <u>final stabilization</u> and completion of construction activities.		Complete		
Recordkeeping Requirements				
– Maintain The specifications, contracts, standards, operating procedures, and other documents used to meet the permit requirements.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.i, I.E.3.b.i	Complete all applicable changes to the regulatory mechanism(s): Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	Previous Term

Analyze Regulatory Mechanism Exemptions		Status		
Must implement procedures to ensure that any exclusions, exemptions, waivers, and variances included in the regulatory mechanism are applied in a manner that complies with the terms and conditions of this permit.		Complete		
Recordkeeping Requirements				
– Maintain the specifications, contracts, standards, operating procedures, and other documents that allow for exemptions and the documented procedures that confirm the exemptions, waivers, and variances comply with the permit.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.ii, I.E.3.b.ii	Analyze all regulatory mechanism exemptions: Ensure that any exemptions meet the requirements of the permit and revise the regulatory mechanism as necessary.	AR, 2024	08/31/2023	08/01/2023

Construction Activities Stormwater Management Plans				Status
Review pages 17-20 of the permit to revise any existing SWMP requirements in current procedures.				Complete
Implement changes.				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>– Maintain copies of the final SWMP reviewed prior to the initial inspection and major modifications.</li> <li>– Maintain confirmation of SWENT's review and acceptance.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.iv, I.E.3.b.iv	Year 1: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2024	08/31/2023	07/18/2023
I.E.3.a.iv, I.E.3.b.iv	Year 2: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2025	08/31/2024	

Site Inspections				Status
Review pages 20-24 of the permit to revise any existing site inspection requirements in current procedures.				Complete
Implement changes.				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>– Site Inspection Frequency Exclusion: The specifications, standards, operating procedures, and other documents used to meet the permit requirements.</li> <li>– <u>For Initial &amp; Final Inspections:</u> <ol style="list-style-type: none"> <li>1. Inspection date</li> <li>2. Name of inspector</li> <li>3. Site identification</li> <li>4. Inspection results including the location of any illicit discharges, failure to implement control measures, and inadequate control measures. The inspection results should also list (not locate) any control measures requiring routine maintenance.</li> <li>5. Type of Inspection</li> </ol> </li> <li>– <u>For Compliance Site Inspections:</u> <ul style="list-style-type: none"> <li>▪ Items 1-5 above</li> <li>▪ Plus If the inspection is conducted in lieu of a follow-up inspection, identification of any inadequate control measures that have not been resolved from the previous inspection.</li> </ul> </li> <li>– <u>For Reduced Site Inspections:</u> <ul style="list-style-type: none"> <li>▪ Items 1-5 above</li> <li>▪ Plus If the inspection is conducted in lieu of a follow-up inspection, identification of any inadequate control measures that have not been resolved from the previous inspection.</li> <li>▪ Note if it is an Inactive Site or an Indicator Inspection.</li> </ul> </li> <li>– <u>For Follow-up Inspections:</u> <ul style="list-style-type: none"> <li>▪ Items 1-3 above</li> <li>▪ Plus Inspection results including any inadequate control measures that have not been resolved from the previous inspection.</li> <li>▪ Plus type of Follow-up Inspection: Compliance, Indicator, QSM</li> </ul> </li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.v, I.E.3.b.v	Year 1: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2024	08/31/2023	Complete
I.E.3.a.v, I.E.3.b.v	Year 2: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2025	08/31/2024	

Control Measure Requirements				Status
Review pages 15-17 of the permit to revise any existing control measure requirements in current procedures.				Complete
Implement changes.				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>Maintain the specifications, contracts, standards, operating procedures, and other documents used to meet the permit requirements.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.iii, I.E.3.b.iii	Year 1: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2024	08/31/2023	07/18/2023

Enforcement Response				Status
Review pages 24-25 of the permit to revise any existing enforcement response requirements in current procedures.				Complete
Implement changes				None
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>Maintain the applicable specifications, contracts, standards, operating procedures, policies and other documents used to meet the permit requirements.</li> <li>Maintain records of the enforcement documents and escalation policies, and number of enforcement responses per enforcement mechanism, and documentation of SWENT's rationale of why SWENT did not take enforcement action under <a href="#">Part I.E.3.a.vi</a>.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.vi, I.E.3.b.vi	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	Previous Term

State or EPA Inspection Notifications				Status
Review page 25 of the permit to revise any existing State or EPA inspection notification requirements in current procedures.				Complete
Implement changes.				None
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>Maintain the applicable specifications, contracts, standards; operating procedures, and other documents used to meet the permit requirements.</li> <li>Maintain records of the analysis of the comparison between SWENT inspections and state and EPA inspections.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.vii, I.E.3.b.vii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	Previous Term

Training				Status
Review page 26 of the permit to revise any existing training requirements in current procedures.				Complete
Implement changes.				None
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>Name and title of each staff trained, date of training, the type of training, and a list of topics covered.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.viii, I.E.3.b.viii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	Previous Term



Consideration of Information Submitted by the Public				Status
SWENT shall have procedures for the receipt and consideration of information from the public that follow Part I.D.1 as it relates to public information on construction sites.				Complete
Recordkeeping Requirements				
– Maintain The applicable operating procedures and other documents used to meet the requirements of this permit.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.3.a.x, I.E.3.b.x	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	07/18/2023

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
DCM Volume 1	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291</a>	SWENT	Rev. 01/2021
DCM Volume II	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291</a>	SWENT	Rev. 12/2020
SCM	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291</a>	SWENT	Rev. 12/2020
GIM	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291</a>	SWENT	03/2022
GEC Inspection and Enforcement SOP	O:\Storm_General\Drainage Criteria\SOPs	SWENT	07/2021
GEC Document Review and Approval	O:\Storm_General\Drainage Criteria\SOPs	SWENT	07/2021
GEC Training Plan	O:\Storm_General\Drainage Criteria\SOPs	SWENT	10/2021
Policy Clarifications	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria</a>	SWENT	Varies

## I.E.4 Post Construction Program for New Development and Redevelopment

Per section I.E.4 of the MS4 permit, the permittee (SWENT) must implement a program to ensure that controls are in place that would prevent or minimize water quality impacts due to runoff from applicable development sites, including new development and redevelopment sites. The requirements for redevelopment sites do not apply to those activities that meet the definition of routine surface maintenance. See Part I.F.6 regarding the October 29, 2020 City of Colorado Springs Consent Decree. For the permittee, the City of Colorado Spring's adopted Drainage Criteria Manual or equivalent must at a minimum meet the permit requirements, including specifically the requirements in this section, Part I.E.4.

As listed in the Current Control Measure Implementation and Procedure Documents and Electronic Records section below, there are extensive procedures and documents related to implementing the Post Construction Program for New Development and Redevelopment program. For this reason, this section of the PDD will focus on the sections relating to the recordkeeping requirements and the compliance schedule.

Control Measure Requirements				Status
Review the Control Measure Requirements section of the permit on pages 28 – 36.				Complete
Implement changes.				
Recordkeeping Requirements				
Maintain the following records:				
<ul style="list-style-type: none"> <li>– The applicable codes, resolutions, ordinances and program documents used to meet the permit requirements, including the determination of which design standard applies to each applicable development site and the design specifications for each design standard (if applicable).</li> <li>– Any excluded area of the applicable development site, regardless of the type of design standard, must be documented. <ul style="list-style-type: none"> <li>▪ For area excluded under Part I.E.4.a.iv(A)1) and (B)1) SWENT must document the following information: Why capturing 100% of the applicable development site is not practicable, including the impracticability of implementing an additional control measure(s) to treat 100% of the applicable development site (e.g., driveway access that drains directly to street).</li> </ul> </li> <li>– For all sites for which the Alternative Treatment Standards are applied: The site plan and SWENT’s written determination that it is technically infeasible to meet the Water Quality Capture Volume, Pollutant Removal, or Runoff Reduction design standards. SWENT’s written determination shall document that treatment or control of the applicable redevelopment site is technically infeasible. Documentation must demonstrate that offsite treatment control measure will meet the permit requirements, including the following: <ul style="list-style-type: none"> <li>▪ Documentation demonstrating that treating stormwater on the applicable redevelopment site was technically infeasible;</li> <li>▪ Documentation demonstrating that the provided stormwater treatment of impervious surfaces is not otherwise required;</li> <li>▪ Under the Constrained Site Treatment Option - documentation demonstrating the volume reduction and the offsite treatment control measure area has similar pollutant loading requirements.</li> <li>▪ Documentation demonstrating that the impervious area treated by the offsite treatment control measure is equal to or greater than the impervious area at the applicable development/redevelopment site that would be treated by a base design standard;</li> </ul> </li> <li>– We must also maintain a system that tracks the following: <ul style="list-style-type: none"> <li>▪ Location and acreage of untreated impervious area for sites where the Alternative Treatment Standards were applied.</li> <li>▪ Location, including whether it was located in the same HUC10, and acreage of the treated impervious area for the offsite treatment control measure, including but not limited to the type of control measure, the final as-built of the control measure, long-term operation and maintenance agreements (if applicable), property documentation indicating that the offsite treatment control measure is in the Alternative Treatment Standards program and must be preserved.</li> </ul> </li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.iv, I.E.4.b.iv	Year 1: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2024	08/31/2023	07/17/2023
I.E.4.a.iv, I.E.4.b.iv	Year 2: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2025	08/31/2024	

Post Construction Stormwater Quality Control Plans				Status
Review the Post Construction Stormwater Quality Control Plans section of the permit on pages 36 – 38.				Complete
Implement changes.				
Recordkeeping Requirements				

Maintain the following records:

- Copies of final site plans for all applicable control measures.
- For all control measures for which the stormwater runoff flow to a regional permanent control measure is applied:
  - The name and location of the control measure and documentation that the control measure has the capacity for the applicable development site.
  - Procedures to track the drainage area and post-construction projects contributing to the regional control measure.
- For all control measures for which the stormwater runoff flow to a regional permanent control facility is applied:
  - The name and location of the facility and documentation that the facility has the capacity for the applicable development site.
  - Procedures to track the drainage area and post-construction projects contributing to the regional facility.
- For all sites for which the previous permit term standard is applied:
  - Date of the start of SWENT’s review process.
  - SWENT’s approval of the site plan (if applicable).
  - The control measure implementation, and any modifications to the site plan.
- The applicable documentation for the operation and maintenance procedures that ensure the long-term observation, maintenance, and operation of control measures, including routine inspection frequencies and maintenance activities.
- The applicable documentation regarding easements or other legal means for access to the control measure for operation, maintenance, and inspection of control measures.

Compliance Schedule

Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.v , I.E.4.b.v	Year 1: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2024	08/31/2023	07/17/2023
I.E.4.a.v, I.E.4.b.v	Year 2: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2025	08/31/2024	

Final Construction Inspection and Acceptance

Status

Review the Final Construction Inspection and Acceptance section of the permit on page 38.

Complete

Implement changes.

Recordkeeping Requirements

- Maintain records of inspections conducted during construction and our acceptance of the control measure(s), including the process and tools used for documenting inspections, the process for inspection follow-up, including determining, implementing, and documenting the nature of the follow-up action.

Compliance Schedule

Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.vi, I.E.4.b.vi	Year 1: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2024	08/31/2023	07/17/2023
I.E.4.a.vi, I.E.4.b.vi	Year 2: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2025	08/31/2024	

Long-Term Operations and Maintenance and Post Acceptance Oversight

Status

Review the Long-Term Operation and Maintenance and Post Acceptance Oversight section of the permit on pages 38 – 42.

Complete

Implement changes.

Recordkeeping Requirements

- Maintain oversight inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency. For operation and maintenance inspection reports related solely to trash, reports must contain at a minimum (A), (B), (C), (E), (F) and (G):
  - (A) Inspection date
  - (B) Name of inspector
  - (C) Control measure identification, including the type of control measure and control measure owner and operator
  - (D) Confirmation that, based on observation of accessible components, the control measure conforms to the final approved plan
  - (E) Inspection findings including, when present: inadequate control measures and control measures requiring routine maintenance
  - (F) Confirmation that the control measure is operating as designed or a list of follow up actions
  - (G) If applicable from Part I.E.4.b.vii(F), date the follow up actions were completed.
  - (H) Where required under Part I.E.4.a.vii(C)2)(b)(i), the date SWENT reviewed the control measure operator's operation and maintenance records.
  - (I) Where applicable under Part I.E.4.a.vii(C)2)(b)(ii), documentation that the owner of a control measure demonstrated it was infeasible to complete the necessary maintenance within 6 months; the owner's schedule and plan for completing maintenance, the owner's frequent maintenance plan, and a description of temporary control measures that the owner installed to minimize the risk of pollutants in runoff.

**Compliance Schedule**

Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.vii, I.E.4.b.vii	Year 1: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2024	08/31/2023	07/17/2023
I.E.4.a.vii, I.E.4.b.vii	Year 2: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2025	08/31/2024	
I.E.4.a.vii(C), I.E.4.b.vii	Year 2: Ensure initial oversight inspections for 50% of all control measures is complete.	AR, 2025	08/31/2024	
I.E.4.a.vii(C), I.E.4.b.vii	Year 3: Ensure initial oversight inspections for remaining 50% of all control measures is complete.	AR, 2026	08/31/2025	

**Tracking**

**Status**

Implement and document procedures and mechanisms to track the location of and adequacy of operation of control measures constructed after June 4, 2008 implemented in accordance with the program.

Complete

**Recordkeeping Requirements**

Tracking for Control Measures Installed in Accordance with this Permit and Previous Permits, Constructed after June 2, 2008:

Maintain records of the required control measure and regional control measure information, including:

- The type of control measure
- Project identifier
- Ownership of the control measure
- Entity responsible for maintenance
- The location of the control measure
- As-built plan date
- Engineer certification date
- Acceptance date, if it was approved under a previous design standard (if applicable) or if it was approved under the SWENT's current design standard
- The amount of acreage of SWENT's permit implementation area draining to the control measure
- Required frequency of inspections and maintenance.

**Compliance Schedule**

Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.ix, I.E.4.b.ix	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	Previous Permit Term

Regulatory Mechanism					Status
Review existing regulatory mechanism against new permit requirements. New requirements include:					
Require control measures to be implemented in accordance with section I.E.4 of the new permit.					
Require the long-term operation and maintenance of control measures.					
Establish and maintain mechanisms for control measures used to meet the requirements of this permit, including those that are located outside of the jurisdictional control of the City.					
Ability to implement sanctions against entities responsible for installation and for the long-term operation and maintenance of the control measures.					
Recordkeeping Requirements					
– Hold					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.4.a.ii, I.E.4.b.ii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024		

Regulatory Mechanism Exemptions					Status
We must implement procedures to ensure that any exclusions, exemptions, waivers, and variances included in the regulatory mechanism are applied in a manner that complies with the terms and conditions of this permit.					
Recordkeeping Requirements					
– Maintain the specifications, contracts, standards, operating procedures, and other documents that allow for exemptions and the documented procedures that confirm the exemptions, waivers, and variances comply with the permit.					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.4.a.iii, I.E.4.b.iii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024		

Enforcement Response					Status
Review the Enforcement Response requirements of the permit on page 42 and compare to the existing procedures.					
Follow the compliance schedule below.					
Recordkeeping Requirements					
– Maintain records of the enforcement response. The document(s) must detail the types of escalating enforcement responses SWENT will take in response to common violations and time periods within which responses will take place. Must include any reports developed in accordance with <b>Part I.E.4.a.viii(B)</b> , Enforcement Escalation.					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.4.a.viii, I.E.4.b.viii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024		

Training					Status
Train applicable municipal staff to inspect the control measures in accordance with our procedures, including design, installation, operation and maintenance.					
We must identify those who will be likely to inspect the control measures and provide training to those individuals.					
The training must also include information on sediment and flows and the effects on water quality.					
Recordkeeping Requirements					

<ul style="list-style-type: none"> <li>- Name and title of each individual trained</li> <li>- Date of training</li> <li>- The type of training</li> <li>- A list of topics covered.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.x, I.E.4.b.x	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

For Applicable Development Sites that Overlap Multiple Permit Implementation Areas				Status
<p>Develop the following procedures: When a written agreement is in place with a co-regulating MS4 permittee the following is required:</p> <p>(A) Control measure requirements may be imposed on the operator in accordance with the requirements of a co-regulating MS4 permittee pursuant to the written agreement. This requirement does not apply to applicable development sites in the permit implementation area of the Colorado Department of Transportation.</p> <p>(B) Post Construction Stormwater Quality Control Plan review/acceptance and site inspection actions may be conducted by a co-regulating MS4 permittee to meet the requirements of the permit. The agreement must outline which MS4 is responsible for operations and maintenance and which MS4 is responsible for oversight inspections.</p>				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>- Copies of any written agreements between co-regulating MS4 permittees.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.xi, I.E.4.b.xi	If applicable, ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

Excluded Sites				Status
<p>Excluded sites include the list below and have additional requirements. Review page 29 of the permit and revise documents as needed. Excluded Sites:</p> <p>above &amp; underground utilities, non-residential &amp; non-commercial infiltration conditions, disturbance to undeveloped land that will remain undeveloped, stream stabilization projects, trails, maintenance trails, stormwater facilities.</p>				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>- Maintain records of exclusions granted. Records must include the site name, owner name, location, date, site acreage, reason for exclusion, and any information required below.</li> <li>- For Non-Residential and Non-Commercial Infiltration Conditions – any studies used for this exclusion and the documentation granting the exclusion.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.4.a.i, I.E.4.b.i	If using exclusions, complete all applicable changes to the regulatory mechanism(s) and other applicable documents: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2026	08/31/2025	

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
DCM Volume 1	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mliid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mliid=6291</a>	SWENT	Rev. 01/2021
DCM Volume II	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mliid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mliid=6291</a>	SWENT	Rev. 12/2020

SCM	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291</a>	SWENT	Rev. 12/2020
GIM	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-criteria?mlid=6291</a>	SWENT	03/2022
Private PCM Inspection, Tracking, and Enforcement Program	O:\Storm_General\Drainage Criteria\SOPs	SWENT	08/2021
Public PCM Inspection, Tracking, and Enforcement Program	O:\Storm_General\Drainage Criteria\SOPs	SWENT	08/2021



## I.E.5 Industrial and Commercial Facilities Program

The Industrial Facilities Program Plan is in the process of being developed during the initial writing of this PDD. The PDD will act as a checklist to ensure all permit requirements are implemented in the Industrial Facilities Program Plan.

Per Section I.E.5 of the MS4 permit, the permittee (SWENT) must implement a program to monitor and minimize pollutants in stormwater discharges to the MS4 from industrial facilities.

Industrial and Commercial Facility Inventory				Status
SWENT must maintain an inventory of industrial and commercial sources in our jurisdiction with a high potential to discharge pollutants directly to our MS4. The Industrial and Commercial Facility Inventory must at a minimum include the following:				
Municipal landfills, hazardous waste treatment, disposal, and recovery facilities				
Wood product facilities (sector A4)				
Glass, clay, cement, concrete and gypsum product facilities (sector E)				
Steam electric generating facilities (sector O),				
Any industrial and commercial facility type SWENT identifies as posing a significant negative water quality impact.				
Additionally, SWENT must consider those industrial facilities listed in section 61.3(2)(e)(iii), except (J) construction activity, in their inventory.				
If SWENT identifies an industrial or commercial facility as potentially needing to obtain a CDPS or NPDES permit, we must refer the facility to CDPHE. We do not need to proactively identify such facilities.				
The following information must be included for each facility listed in the Industrial and Commercial Facility Inventory:				
1) Address and latitude/longitude of the facility.				
2) Name of receiving water.				
3) A narrative description of the industrial activity including the primary standard industrial classification (SIC) code for each facility, if applicable.				
4) Indication of whether a Facility has a No Exposure certification, and a list of additional division permits that cover the facility, including individual or general Colorado-issued CDPES Permits or EPA issued NPDES permits.				
The Industrial and Commercial Facility Inventory must be updated to reflect current facilities located in the permit implementation area, but at a minimum it must be updated at least once every 12 months.				
Per Part I.E.2.a.x (IDDE), SWENT must notify the division of illicit discharges from permitted or unpermitted industrial or commercial facilities.				
Recordkeeping Requirements				
– SWENT must maintain the specifications, standards, operating procedures, and other documents used to meet the permit requirements. The inventory of industrial and commercial facilities.				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.5.a.i, I.E.5.b.i	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

Education and Outreach				Status
SWENT shall develop, document, and implement a strategy to provide education and outreach to industrial and commercial facilities on the proper selection, design, and implementation of control measures. The strategy shall address the proper management and disposal of used oil and toxic materials as well as other pollutants targeted by SWENT. At a minimum, the strategy must include the following:				

<p>Provide education and outreach materials and/or activities for all industrial and commercial facilities identified on the Industrial and Commercial Facility Inventory of both their potential to contribute polluted stormwater run-off and their potential requirement to gain permit coverage if they are regulated (if the facility is unpermitted).</p> <p>We must provide to each facility on the Industrial and Commercial Facility Inventory at least one education and outreach material or activity at least once every 12 months.</p> <p>*Education as provided under Part I.E.1.a.ii(A) or Part I.E.5.a.iii(A)2)(b) (E&amp;O Section) may count towards this requirement.</p>				
Provide information for industrial and commercial facilities on SWENT's web site.		Updated 2022		
<b>Recordkeeping Requirements</b>				
<ul style="list-style-type: none"> <li>- SWENT must maintain the specifications, standards, operating procedures, and other documents that used to meet the permit requirements.</li> <li>- A written list of the distribution mechanism for each education and outreach material and activity and the following: <ul style="list-style-type: none"> <li>▪ Dates the activities were implemented</li> <li>▪ Name of the industrial facilities</li> <li>▪ Dates of events and the materials that were made available.</li> </ul> </li> </ul>				
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.5.a.ii, I.E.5.b.ii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

Site Inspections	Status
<p><b>Aerial Imagery Inspections:</b> SWENT must inspect each facility on the Industrial and Commercial Facility Inventory. Aerial imagery used for aerial imagery inspections must be updated at a minimum of twice per year.</p> <p><b>Frequency:</b> Aerial imagery inspections must be conducted once every 5 years.</p> <p><b>Scope:</b> The inspection must assess the following:</p> <ul style="list-style-type: none"> <li>(a) If the facility is a significant source of stormwater pollutant discharges.</li> <li>(b) Pollutant sources: Evaluate all pollutant sources and facility housekeeping.</li> <li>(c) Discharge points: Evaluate discharge points to the MS4 and beyond the limits of the facility for evidence of potential pollutants migrating off of the facility (i.e. vehicle tracking, tailings beyond the fence, etc). ..</li> </ul>	
<p><b>Onsite Inspections:</b></p> <p><b>Frequency:</b> Onsite inspections must be conducted within 12 months of a facility being identified as a potentially significant source of stormwater pollutants (i.e. poor housekeeping, evidence of pollutant migration off-site) through the aerial imagery inspections.</p> <p><b>Scope:</b> The inspection must assess the following:</p> <ul style="list-style-type: none"> <li>(a) If the facility is a significant source of stormwater pollutant discharges.</li> <li>(b) Control measures: Identify failure to implement control measures and inadequate control measures. If one or more of the above items are identified, SWENT must educate the industrial facility on proper control measure practices.</li> <li>(c) Pollutant sources: Evaluate all pollutant sources, to determine if an illicit discharge has occurred.</li> <li>(d) Discharge points: Evaluate discharge points to the MS4, or beyond the limits of the facility as necessary to determine if an illicit discharge has occurred. SWENT must implement their illicit discharge detection and elimination program when an illicit discharge is found.</li> </ul>	
<b>Recordkeeping Requirements</b>	

Aerial Imagery Inspections: Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency:

- 1) Inspection date
- 2) Name of inspector
- 3) Inspection results including any evidence of poor facility housekeeping or potential pollutants migrating off of the facility boundaries.

Onsite Inspections: Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency:

- 1) Inspection date
- 2) Name of inspector
- 3) Facility representative, if applicable.
- 4) Inspection results including location of any illicit discharges, failure to implement control measures, and inadequate control measures.

#### Compliance Schedule

Permit Section	Action	Deliverable	Deadline	Date Finalized
Part I.E.5.a.iii, I.E.5.b.iii	Year 1-2: Develop list of tasks needed to revise the program, develop and revise documentation as necessary.	AR, 2025	08/31/2024	
I.E.5.a.iii, I.E.5.b.iii	Year 3-5: Implement the program; ensure requirements are met; Revise documentation as necessary.	AR, 2028	08/31/2027	

#### Training

Status

SWENT must require all existing and newly hired municipal staff who are involved in the industrial and commercial facilities program to be trained once a year. The training must, at a minimum, include the following:

- (A) Basic industrial stormwater management, and
- (B) How to identify questionable or suspicious conditions that could cause impairment or illicit discharge to the MS4 or receiving waters.

#### Recordkeeping Requirements

– Name and title of each individual trained, date of training, the type of training, and a list of topics covered.

#### Compliance Schedule

Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.5.a.iv, I.E.5.b.iv	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

#### Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
Industrial Facility Program Plan	O:\Storm_General\Industrial Inspection Program\Program Development 2022	SWENT	12/2022

## I.E.6 Pollution Prevention/Good Housekeeping Program

Each municipal facility has its own Municipal Facility Runoff Control plan (MFRCP) in compliance with the MS4 permit requirements.

Outdoor Bulk Storage					Status														
<p>Review Outdoor Bulk Storage requirements in all existing MFRCP documents and identify all sites that have bulk storage of 55 gallons or more.</p> <p>Outdoor bulk storage structures, of more than 55 gallons, for petroleum products and any other liquid chemicals located at applicable SWENT facilities must have control measures implemented that provide secondary containment or equivalent protection that contains all spills and prevents any spilled material from entering state waters.</p> <p>Single containment system serving multiple tanks, the containment system must have sufficient capacity to contain 10% of the volume of containers, or the volume of the largest container plus 10%, whichever is greater.</p>					Complete														
<p align="center"><b>Recordkeeping Requirements</b></p> <p>– Document a description of the types of control measures implemented for outdoor bulk storage structures.</p>																			
<p align="center"><b>Compliance Schedule</b></p> <table border="1"> <thead> <tr> <th>Permit Section</th> <th>Action</th> <th>Deliverable</th> <th>Deadline</th> <th>Date Finalized</th> </tr> </thead> <tbody> <tr> <td>I.E.6.a.vi, I.E.6.b.vi</td> <td>Year 1: Evaluate the need for outdoor bulk storage structure(s); revise implementation and documentation if necessary.</td> <td>AR, 2024</td> <td>08/31/2023</td> <td>08/31/2023</td> </tr> <tr> <td>I.E.6.a.vi, I.E.6.b.vi</td> <td>Year 2-5: Install secondary containment for outdoor bulk storage structure(s) and ensure requirements are met.</td> <td>AR, 2027</td> <td>08/31/2026</td> <td></td> </tr> </tbody> </table>						Permit Section	Action	Deliverable	Deadline	Date Finalized	I.E.6.a.vi, I.E.6.b.vi	Year 1: Evaluate the need for outdoor bulk storage structure(s); revise implementation and documentation if necessary.	AR, 2024	08/31/2023	08/31/2023	I.E.6.a.vi, I.E.6.b.vi	Year 2-5: Install secondary containment for outdoor bulk storage structure(s) and ensure requirements are met.	AR, 2027	08/31/2026
Permit Section	Action	Deliverable	Deadline	Date Finalized															
I.E.6.a.vi, I.E.6.b.vi	Year 1: Evaluate the need for outdoor bulk storage structure(s); revise implementation and documentation if necessary.	AR, 2024	08/31/2023	08/31/2023															
I.E.6.a.vi, I.E.6.b.vi	Year 2-5: Install secondary containment for outdoor bulk storage structure(s) and ensure requirements are met.	AR, 2027	08/31/2026																

Control Measure Requirements					Status									
<p>At a minimum, control measures must be adequately designed and implemented to address potential pollutant sources associated with applicable operations and facilities to minimize the discharge of pollutants, including trash, to the MS4.</p>														
<p align="center"><b>Recordkeeping Requirements</b></p> <p>– Maintain the specifications, standards, operating procedures, and other documents used to meet the permit requirements.</p>														
<p align="center"><b>Compliance Schedule</b></p> <table border="1"> <thead> <tr> <th>Permit Section</th> <th>Action</th> <th>Deliverable</th> <th>Deadline</th> <th>Date Finalized</th> </tr> </thead> <tbody> <tr> <td>I.E.6.a.i, I.E.6.b.i</td> <td>Ensure requirements are met; revise implementation and documentation if necessary.</td> <td>AR, 2025</td> <td>08/31/2024</td> <td></td> </tr> </tbody> </table>						Permit Section	Action	Deliverable	Deadline	Date Finalized	I.E.6.a.i, I.E.6.b.i	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024
Permit Section	Action	Deliverable	Deadline	Date Finalized										
I.E.6.a.i, I.E.6.b.i	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024											

Municipal Facility Runoff Control Measures					Status
<p>SWENT must maintain a list of all applicable municipal facilities. Applicable facilities include the following:</p> <ol style="list-style-type: none"> <li>1) Vehicle maintenance and washing facilities, motor pools with vehicle maintenance and washing, and loading and unloading areas.</li> <li>2) Asphalt and concrete batch plants that are not subject to a separate CDPS or NPDES permit coverage.</li> <li>3) Solid-waste transfer stations where waste and recyclables are briefly held before further transport.</li> <li>4) Outdoor storage yards with exposed stockpiles of materials which may be reasonably expected to affect the quality of stormwater runoff, including stockpiles of road deicing salt, salt and sand, sand, and rotomill material, dirt, snow dumps, sweeper tailings and/or spoils, gravel.</li> <li>5) Equipment storage yards.</li> <li>6) Areas of the municipal airport with potential pollutant sources associated with applicable operations and facilities that do not require coverage by a CDPS/NPDES permit for the discharge of stormwater associated with industrial activity per Regulation 61.3(2)(e)(ii) through (v) and (f)(i).</li> </ol>					Complete

SWENT shall implement control measures to minimize potential discharges of pollutants to the MS4 from the applicable facilities. New procedures shall be developed and implemented for any new applicable facilities before the facility becomes operational.				
SWENT shall implement the following categories of control measures as necessary to minimize the pollutant sources present: <ol style="list-style-type: none"> <li>1) Preventative maintenance</li> <li>2) Good housekeeping</li> <li>3) Spill prevention and response procedures</li> <li>4) Structural control measures</li> <li>5) Evaluation of non-stormwater discharges</li> <li>6) Personnel training</li> </ol>		Complete		
<b>Recordkeeping Requirements</b>				
– A facility runoff control plan must be developed for each applicable facility and include the following information: <ol style="list-style-type: none"> <li>(A) Facility address, size, and description</li> <li>(B) Types of operations and activities</li> <li>(C) Receiving water drainage basin</li> <li>(D) Facility site map, including location(s) of where stormwater discharges from the site</li> <li>(E) Identification of potential pollutant sources</li> <li>(F) Control measures implemented, including installation and implementation specifications and information, including the following:             <ol style="list-style-type: none"> <li>1) Runoff control plan administrator</li> <li>2) Preventative maintenance</li> <li>3) Good housekeeping</li> <li>4) Spill prevention and response procedures</li> <li>5) Structural and/or nonstructural control measures</li> <li>6) Evaluation for non-stormwater discharges</li> <li>7) Employee training</li> </ol> </li> <li>(G) Personnel (position title) responsible for implementation of control measures and associated documentation</li> </ol>				
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.6.a.ii, I.E.6.b.ii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	08/31/2023

Municipal Site Inspections	Status
SWENT shall implement written facility inspection procedures, which must at a minimum include the following: <ol style="list-style-type: none"> <li>A. An annual visual inspection of each applicable facility, not including permanent control measures in Part I.E.4.</li> <li>B. A verification that the written facility procedures, documentation, and site map are current.</li> <li>C. Visual observation of locations and areas where stormwater from facilities is discharged off-site, including discharges to state waters, or to a storm sewer system that drains to state waters. The observations, at a minimum must include the following:               <ol style="list-style-type: none"> <li>1) Observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in any stormwater discharge(s) and dry weather flows, if observed,</li> <li>2) Observations of the condition of and around stormwater outfalls, including flow dissipation measures to prevent scouring, and</li> <li>3) Observations for the presence of illicit discharges or other non-permitted discharges.</li> </ol> </li> </ol>	Complete

<p>D. Visual observation of facility conditions, including pollutant sources and control measures, to identify inadequate control measures and control measures requiring maintenance.</p> <ol style="list-style-type: none"> <li>1) All inadequate control measures shall be modified or replaced as soon as possible, but not later than 6 months from the visual inspection. If the permittee is unable to modify or replace the inadequate control measure within 6 months, then the permittee must complete the following.</li> <li>2) Develop a plan to modify or replace the inadequate control measure.</li> <li>3) Develop a frequency maintenance plan.</li> <li>4) Install a temporary feature on the inadequate control measure or repair/re-engineer the inadequate control measure to minimize the risk of pollutants in runoff from municipal operations.</li> </ol> <p>All control measures requiring routine maintenance shall be maintained as soon as possible, but not later than 6 months from the visual inspection.</p>		Complete		
<b>Recordkeeping Requirements</b>				
<p>– Inspection procedures. Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency:</p> <ol style="list-style-type: none"> <li>1) Inspection date</li> <li>2) Name of inspector</li> <li>3) Applicable facility identification</li> <li>4) Inspection findings including, when present: inadequate control measures, control measures requiring routine maintenance, and if there was any evidence of polluted discharges from the facility</li> <li>5) Confirmation and documentation that the control measures are adequate or a list of follow up actions</li> <li>6) Confirmation that all follow-up actions, including control measure maintenance and control measure modification or replacement, have been completed and the date of completion.</li> </ol>				
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.6.a.iii, I.E.6.b.iii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	08/31/2023

<b>Municipal Operations and Maintenance Procedures</b>				Status
<p>SWENT shall implement written facility inspection procedures, which must at a minimum include the following:</p>				Complete
<b>Recordkeeping Requirements</b>				
<p>– Maintain written procedures documenting the types of control measures that must be implemented for each type of procedure. Written documentation must include: installation, maintenance, and implementation information for each type of control measure.</p>				
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.6.a.iv, I.E.6.b.iv	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	08/25/2023

Nutrient Source Reductions and Phosphorous in Fertilizer Evaluation					Status
<p>We are now required to prevent or reduce nitrogen and phosphorus in stormwater runoff associated with the applicable municipal operations and facilities. We shall evaluate, identify, and document the municipal operations and facilities that are and/or have the potential to contribute nitrogen and phosphorus to the waters receiving the discharge authorized under this permit (identified municipal operations nutrient sources).</p> <p>We may meet the requirements of this section through contribution to a collaborative program to evaluate, identify, and target sources state-wide or within the specific region or watershed that includes the receiving waters impacted by the municipal facility discharge(s). Additionally, we must evaluate the following:</p> <ul style="list-style-type: none"> <li>Any operations that use fertilizers, shall include the storage and application of fertilizer, including subsequent stormwater or irrigation runoff from areas where fertilizer has been applied, as an identified municipal operations nutrient source if these operations were not covered under Part I.E.6.a.ii(A) (Municipal Facility Runoff Control Measures) &amp; Part I.E.6.a.iv (Municipal Operations and Maintenance Procedures).</li> <li>Additionally, once in the permit term, the facility must identify if the fertilizers contain phosphorus above 1%. If the fertilizers contain phosphorus above 1%, the facility must evaluate whether a phosphorus-free fertilizer could be used instead and meet the desired performance.</li> <li>The facility shall implement good housekeeping control measures that prevent or reduce nitrogen and phosphorus in stormwater runoff associated with identified municipal operations nutrient sources.</li> </ul>					
<b>Recordkeeping Requirements</b>					
– Document the types of control measures implemented to prevent or reduce nitrogen and phosphorus from municipal operations, including installation, procedure and implementation information and fertilizer evaluation, if applicable.					
<b>Compliance Schedule</b>					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.6.a.v, I.E.6.b.v	Nutrient Source Reduction: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024		
I.E.6.a.v, I.E.6.b.v	Phosphorous in Fertilizer Evaluation: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2028	08/31/2027		

Use of Fire Fighting Foam in Training Activities and Emergencies					Status
<p>The City must prohibit the use of AFFF Class B firefighting foam that contains perfluoroalkyl and polyfluoroalkyl substances for training or testing purposes unless the use of such foam is required by federal law.</p> <p>For emergency use, the City shall evaluate whether a Class B fluorine-free foam can provide the required performance for the specific hazard. Fluorinated Class B foams should only be used in situations of significant flammable liquid hazard with risk for public safety or significant property loss, where the performance of other foams has not been demonstrated to date.</p>					
<b>Recordkeeping Requirements</b>					
– Maintain documentation of whether Class B firefighting foams containing perfluoroalkyl and polyfluoroalkyl substances were used in an emergency, the locations of that use, and, if used, an evaluation of whether alternatives are available.					
<b>Compliance Schedule</b>					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.6.a.vii, I.E.6.b.vii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024		

Training				Status
<p>We must train applicable City staff to implement the Pollution Prevention/Good Housekeeping Program, including training for staff that will conduct inspections in accordance with the Municipal Site Inspections section of the permit, page 49.</p> <p>Additionally, staff responsible for the Municipal Operations and Maintenance Procedures (pg 49) must be trained on the potential for illicit discharges and the water quality impacts of those operations when the procedures are not followed. The training must also include information on trash and nutrients and their effects on water quality.</p>				
Recordkeeping Requirements				
<ul style="list-style-type: none"> <li>– A list of staff positions and departments/agencies that must be trained and the frequency of training. Program documents that describe how and when new employees will be trained. Name and title of each individual trained, date of training, the type of training, and a list of topics covered.</li> </ul>				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.6.a.viii, I.E.6.b.viii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2025	08/31/2024	

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
MFRCP	O:\Storm_General\MFRCP\Documents (Note: Each facility has their own MFRCP document. The files are all available through the above link and are held at each site. Each MFRCP document will be revised and added here by the deadline.)	SWENT	Varies



## I.E.7 Dry Weather and Wet Weather Monitoring

The MS4 permit has dry weather monitoring requirements in the Illicit Discharge portion of the permit under section I.E.2 as well as under the Dry Weather and Wet Weather Monitoring requirements under section I.E.7. This area of the PDD will focus on permit compliance for dry and wet weather monitoring requirements under section I.E.7 of the permit. The Monitoring Plan details the procedures for both sections (I.E.2 and I.E.7) of the permit.

Dry Weather Monitoring		Status		
<p>SWENT must implement a dry weather monitoring program to assess dry weather impacts from the MS4 to impaired stream segments, specifically segments impaired with E. coli. SWENT may conduct this monitoring in conjunction with requirements under Part I.E.2.a.xii, Dry Weather Outfall Screening and Monitoring on page 13 of the permit.</p> <p>The Monitoring Plan details the permit requirements of this section and the implementation plan. Below is an outline of the requirements:</p> <p>SWENT must develop and implement a dry weather monitoring plan on 2 of the 8 identified priority outfalls of concern that exceeded the recreation standard for E. coli at all times of the year. The goal of the monitoring plan is to identify sources of E. coli within the outfall catchment area and the scope of the E. coli impairment. The monitoring plan must include the following components:</p> <p>(A) The 2 selected outfalls must include dry weather flows greater than 5 gpm.</p> <p>(B) One stormwater sample must be conducted before source investigation begins at the outfall at least once between November and April with at least 48 hours since the last precipitation and no snowmelt...</p> <p>(C) A strategic sampling methodology for isolating areas and sources within the outfall catchment that are contributing E. coli...</p> <p>(D) Identification of industrial or commercial facilities with a potential to discharge dry weather flows containing E. coli.</p> <p>(E) One stormwater sample conducted at the outfall at least once between November and April...</p> <p>(F) If SWENT identifies a potential illicit discharge, it must follow its IDDE procedures..</p> <p>(G) If none of the 8 priority outfalls of concern have an initial sample from Part I.E.7.a.i(B) over 126 CFU per 100 mL, SWENT does not need to continue sampling and would provide these results in the report..</p>				
<b>Recordkeeping Requirements</b>				
– *Recordkeeping requirements were not specifically called out for this section; all data must be submitted in the report.				
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.7.a.i	Year 1-2: Identify which two outfalls will be studied and procedures/methodology necessary to complete E. coli source investigation.	AR, 2025	08/31/2024	
I.E.7.a.i	Year 3-4: Complete the E.coli source investigation.	AR, 2027	08/31/2026	
I.E.7.a.i	Year 5: Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2028	08/31/2027	

Dry Weather Monitoring Report					Status
SWENT must submit a report at the end of permit year 5 in the following annual report of the source investigation findings and if the source was eliminated, including the sample results, an analysis of any sampling conducted, and recommendations for the next permit term.					
Recordkeeping Requirements					
– *Recordkeeping requirements were not specifically called out for this section; all data must be submitted in the report.					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.7.a.ii	Year 5: Complete and submit in annual report the dry weather monitoring report.	AR, 2028	08/31/2027		

Wet Weather Monitoring – Previous Monitoring Plan					Status
SWENT must implement a wet weather monitoring program to assess wet weather impacts from the MS4 to impaired stream segments where the City has 303(d)-listed streams within the permit implementation area, and to assess the effectiveness of the municipal stormwater program.					
SWENT must continue the wet weather monitoring plan from the previous permit term as approved by the division in the document entitled <i>City of Colorado Springs Municipal Separate Storm Sewer System Permit (COS-000004) Monitoring Plan Prepared 8/31/12</i> . SWENT may make changes to the existing monitoring plan, but must maintain the following components:					
(A) List of pollutants of concern. SWENT may utilize either the list from the wet weather monitoring plan from the previous permit term or the list found in this permit of the MS4 Pollutants of Concern					
(B) Analytical and sampling methodology. The methodology is listed in Part I.K of this permit.					
(C) Similar resource expenditure.					
Nine instream sampling locations that have had at least one sampling event per calendar year since 2004 and eleven instream sampling locations that have flow data from at least one event per calendar year since 2004...					
Recordkeeping Requirements					
– *Recordkeeping requirements were not specifically called out for this section; all data must be submitted in the report.					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.7.b.i	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2024	08/31/2023	11/10/2022	

Wet Weather Monitoring – Outfall Study					Status
Additionally, as part of the wet weather monitoring plan, SWENT must identify 3 outfalls to assess at least one of the four following study areas:					Complete
(1) Target an area of the MS4 that has increased E. coli concentrations during wet weather events using the priority outfalls of concern that exceeded the recreation standard for E. coli at all times of the year in the <i>Dry Weather E. coli Analysis Report dated October 2017</i> to identify trends.					
(2) Target outfalls of a specific catchment type to characterize stormwater runoff...					
(3) Target outfalls that allow for comparison between an area with minimal control measures and an area with control measures installed per the MS4 permit requirements...					
(4) Target outfalls that can provide the ability to do a sediment analysis comparison.					
The study area plan must include the following:					
(A) Monitor 3 outfalls each calendar year from 3 measurable storm events at least one month apart...					
(B) All samples must be taken during a measurable storm event...					
(C) Monitoring will begin according to the compliance schedule and last for 4 years...					
Recordkeeping Requirements					
– *Recordkeeping requirements were not specifically called out for this section; all data must be submitted in the report.					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
I.E.7.b.ii	Year 1: Identify which study, outfalls and procedures/methodology.	AR, 2024	08/31/2023	08/31/2023	

I.E.7.b.ii	Year 1-5: Complete the outfall study investigation.	AR, 2028	08/31/2027	
I.E.7.b.ii	Ensure requirements are met; revise implementation and documentation if necessary.	AR, 2028	08/31/2027	
I.E.7.b.ii	Year 5: Complete and submit in annual report the study report.	AR, 2028	08/31/2027	

Wet Weather Monitoring Trend Analysis				Status
<p>SWENT must submit a trend analysis at the end of permit year 5 in the following annual report from instream data collected from at least between 2004 – 2024 on at least 1 site in the Upper Fountain Creek, 2 sites in Monument Creek and 2 sites in Lower Fountain Creek.</p> <p>SWENT must evaluate if data points prior to 2004 are also available for the 5 sites, and, if so, incorporate those data into the trend analysis. At a minimum, the trend analysis must include the following:</p> <p>(A) The selected 5 sites must be representative of the MS4 permit implementation area and minimize the influence of other major point source influences...</p> <p>(B) At a minimum, SWENT must analyze the following parameters: flow, E. coli, ammonia, nitrate plus nitrite, total phosphorus, TSS, total arsenic, total and dissolved selenium, total cadmium, total and dissolved iron, total lead, conductance, temperature, pH, hardness, as they relate to the three flow regimes (base flow/cold season, normal flow/warm season, and stormflow)</p> <p>(C) The trend analysis must also analyze the parameters in relation to the change in imperviousness during the same time period to identify if a correlation exists between water quality and incorporating stormwater management practices.</p> <p>(D) Recommendations for the wet weather monitoring program for the next permit term.</p>				
<b>Recordkeeping Requirements</b>				
– *Recordkeeping requirements were not specifically called out for this section; all data must be submitted in the report.				
<b>Compliance Schedule</b>				
Permit Section	Action	Deliverable	Deadline	Date Finalized
I.E.7.b.iii	Year 1-2: Complete data collection.	AR, 2025	08/31/2024	
I.E.7.b.iii	Year 5: Complete and submit in annual report the trend analysis.	AR, 2028	08/31/2027	

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
2022 Monitoring Plan	O:\Storm_General\Water Quality Monitoring	SWENT	10/2022

## I.F.4 Discharges to Waters with Total Maximum Daily Loads (TMDLs)

N/A It is a permit requirement to include this section in our PDD. At the time of the writing of the original PDD document there are no TMDL requirements in the permit. This will be updated if/when a TMDL is in place.

Hold

TBD		Status		
N/A				
Recordkeeping Requirements				
– N/A				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
N/A				

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
N/A			

## I.F.5 Implementation by Other Parties

Per the MS4 Permit: Implementation of one or more of the actions required to comply with a term or condition of this permit, including effluent limitations, may be shared with another entity or the other entity may fully take over implementation of the action(s). The permittee remains liable for ensuring that all requirements of this permit are complied with, regardless of who implements the action(s). The permittee may rely on another entity for implementation only if:

Implementation by Other Parties Guidelines		Status		
<p>SWENT may rely on another entity for implementation only if:</p> <p>(A) The other entity agrees to implement the action(s) on SWENT’s behalf. Written acceptance of this obligation is required and must be maintained as part of the PDD.</p> <p>(B) If the other entity conducts oversight of a third party to meet a pollutant restriction, prohibition, or reduction requirement, the entity must be capable of remaining impartial and must be a separate entity than the owner/operator of the activity for which the oversight is targeted.</p> <p>(C) The other entity must be capable of completing the necessary actions to comply with the relevant pollutant restriction, prohibition, or reduction requirement(s), including but not limited to effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate written quality assurance procedures.</p> <p>(D) If SWENT uses another party, including a storm water management system administrator, to conduct site inspections on their behalf, then SWENT must develop written procedures to demonstrate and report that the storm water management system administrator program meets the requirements of Part I.E.1.a.v. and Part I.E.1.b.v.</p>				
Recordkeeping Requirements				
– N/A				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
	N/A			

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
	TBD		

I.F.6 Consent Decree

Consent Decree Obligations					Status
<p>The City's obligations under the Consent Decree are in addition to the City's obligations under this MS4 Permit. To the extent there is a conflict between an obligation in the Consent Decree and the Permit, the more stringent obligation shall apply. SWENT must notify the division of the identified conflict within 14 days of identification.</p> <p>Meeting the reporting requirements of the Consent Decree does not relieve SWENT of the reporting requirements of this permit and the Clean Water Act.</p>					
Recordkeeping Requirements					
- N/A					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
	N/A				

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
Consent Decree	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-consent-decree">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-consent-decree</a>	U.S. Department of Justice	2020

I.F.7 Resources

City Resources					Status
<p>SWENT shall provide adequate finances, staff, equipment, and support capabilities to implement the stormwater management program.</p>					
Recordkeeping Requirements					
- N/A					
Compliance Schedule					
Permit Section	Action	Deliverable	Deadline	Date Finalized	
	N/A				

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
	N/A		

## I.G.7 Program Review and Modifications

Annual Program Review				Status
<p>SWENT shall conduct an annual review of the current program areas as necessary for the preparation of the annual report required under Part I.I. This annual review shall include the following:</p> <ol style="list-style-type: none"> <li>A review of the compliance status with requirements in Part I.E., Part I.F.6, Part I.F.7., and compliance schedules in Part I.H.</li> <li>An assessment of the effectiveness of control measures.</li> <li>An assessment of any permit modifications that may be needed if compliance with a current term or condition may not be practicable.</li> </ol>				
Recordkeeping Requirements				
– N/A				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
	N/A			

### Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
N/A			

## I.G.7 Reporting Requirements

Annual Report		Status
<p>SWENT shall prepare an annual report for the entire permit implementation area to be submitted to the division by April 1 of each year, covering January 1 through December 31 of the previous year. The first report may include less than 12 months of information. The report must include the following information:</p> <ol style="list-style-type: none"> <li>The required certification statement in Part II.K and signed by the individual meeting the criteria in Part II.K.</li> <li>Identify that the SWENT is relying on another entity to satisfy any of the permit obligations (if applicable) if not included in previous reports or permit application.</li> <li>An update on areas added to or removed from the permit implementation area, which may include newly annexed areas.</li> <li>A list of compliance schedule items completed, including the date of completion and any associated information required in Part I.H.</li> <li>The results of the assessment of the effectiveness of the control measures.</li> <li>A list of any parts of this permit needed to be modified or a condition of the permit that may not be practicable.</li> <li>A fiscal analysis of the necessary capital and operation and maintenance expenditures necessary to accomplish the activities of the programs.</li> <li>Provide the following information for the program elements listed below:</li> </ol>		
<p><b>Public Education and Outreach Program (Part I.E.1)</b></p> <ol style="list-style-type: none"> <li>A list of the education and outreach activities completed in accordance with Part I.E.1.a.i., ii, and iii.</li> <li>A list of the education and outreach activities completed in accordance with Part I.E.1.a.iv and the targeted sources.</li> </ol>		
<p><b>Illicit Discharge Detection and Elimination Program (Part I.E.2)</b></p> <ol style="list-style-type: none"> <li>Provide the total number of reports/identification of illicit discharges, including any illicit discharges identified as part of the screening and source investigation in Part I.E.2.a.xii.</li> <li>Total number of enforcement actions taken under this program.</li> </ol>		

<p>Construction Sites Program (Part I.E.3)</p> <p>a. Provide the total number of applicable construction sites required under the Construction Sites Program during the year.</p> <p>b. Provide the total number of approved initial SWMPs for the year.</p> <p>c. Provide the number of sites that SWENT applied the Winter Conditions Exclusion to and the dates that the Winter Conditions Exclusion was used.</p> <p>d. Provide the total number of inspections performed for the types of inspections listed below:</p> <p>1) Compliance Inspections: Inspections of applicable construction activities that meet the inspection scope requirements in Part I.E.3.a.v(C) and for which documentation is recorded in accordance with in Part I.E.3.b.v.</p> <p>2) Reduced Site Inspection: Inspections of applicable construction activities that meet the inspection scope requirements in Part I.E.3.a.v(D) for which documentation is recorded in accordance with in Part I.E.3.b.v.</p> <p>3) Follow-up Inspections: Inspections or operator reporting or other action(s) to assess the control measure has been implemented or corrected of applicable construction activities that meet the inspection scope requirements in Part I.E.3.a.v(E) and for which documentation is recorded in accordance with in Part I.E.3.b.v.</p> <p>4) Number of occurrences when follow-up inspections resulted in compliance inspections being required every 14 days per Part I.E.3.a.v(E)3).</p> <p>e. Provide the number of enforcement actions by type of enforcement mechanism per Part I.E.3.vi(B).</p>				
<p>Post Construction Program for New Development and Redevelopment (Part I.E.4)</p> <p>a. Provide the total number of applicable development and redevelopment sites for which control measures were implemented and the type of control measure used for the site during the reporting period.</p> <p>b. Excluded Sites: Provide a total number and list of the applicable development sites that had excluded area under the Alternative Treatment Standards as noted in the recordkeeping information required by Part I.E.4.b.iv:</p> <p>1) Total number and list of sites excluded in accordance with Parts I.E.4.a.i(B) and (C).</p> <p>c. Long-Term Operation and Maintenance and Post Acceptance Oversight: Provide the total number of SWENT private oversight inspections and SWENT public inspections of applicable development sites and control measures to ensure compliance with the requirement in Part I.E.4.a.vii.</p> <p>1) Provide a total number and list of all sites in which SWENT's oversight inspections identified private control measures that were inadequate or needing maintenance, the actions taken by the City to address the noncompliance.</p> <p>d. Enforcement Escalation: Provide the date and control measure identifying information for all reports addressing determinations not to escalate enforcement, in accordance with I.E.4.a.viii..</p>				
<p>Industrial and Commercial Facilities Program (Part I.E.5)</p> <p>a. Describe the status of implementing the industrial facilities program, and the number of facilities identified by SWENT that are included in the facility inventory.</p> <p>b. Report the number of inspections performed under this program.</p> <p>c. Report the number of enforcement actions under this program.</p>				
<p>Pollution Prevention/Good Housekeeping Program (Part I.E.6)</p> <p>a. Report the number of inspections performed on municipal facilities.</p> <p>b. Report the results of the fertilizer containing phosphorus evaluation.</p> <p>c. Report whether Class B firefighting foams containing perfluoroalkyl and polyfluoroalkyl substances are used and, if so, the facility location.</p>				
<p>Additional Requirements – Dry Weather and Wet Weather Monitoring (Part I.E.7)</p> <p>a. Status of reports.</p> <p>b. Sample results taken in each program. E. coli must be expressed as a geometric mean on an annual basis.</p>				
Recordkeeping Requirements				
– Submit in annual report				
Compliance Schedule				
Permit Section	Action	Deliverable	Deadline	Date Finalized
	Annually			

Current Control Measure Implementation and Procedure Documents and Electronic Records:

Current Documents and Electronic Records			
Document Title	Document Location	Source/Author	Date
Annual Report	O:\Storm_General\MS4 Permit\COS MS4 Annual Reports	SWENT	Annually
Annual Report	<a href="https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301">https://coloradosprings.gov/stormwater-enterprise/page/stormwater-ms4-permit?mlid=6301</a>	SWENT	Annually