

**CDPS MS4 Phase II**

**STORMWATER MANAGEMENT**

**PROGRAM DESCRIPTIONS**

**FOR TOWN OF PARKER**

**March 2008 – March 2013**  
**Due to WQCD by June 10, 2008**

Agency Name	Town of Parker
Permit Certification Number	COR - 080011
MS4 Location Description <i>(most permit certifications will cover a single city or county)</i>	City(s) Permitted: Parker County Permitted: n/a Non-Standard MS4(s) Permitted (including location descriptions): n/a
Map	Appendix A
CDPS Program Descriptions	Attached
Program Implementation Area (Counties only)	<input type="checkbox"/> Permitted Area <input type="checkbox"/> Entire Jurisdiction
Joint Submittal	X No <input type="checkbox"/> Yes

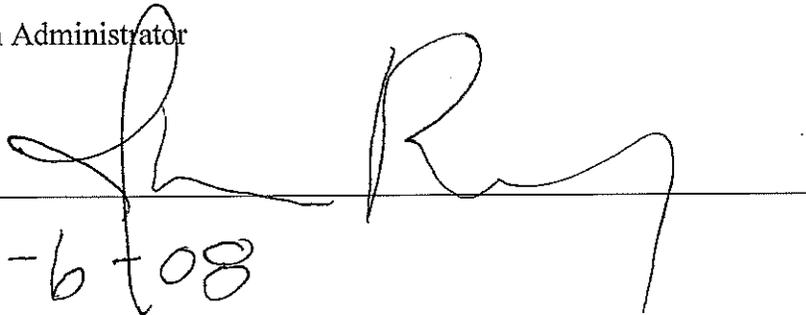
**Certification:** The following certification must be signed by the Legally Responsible Person. The signer must be either a principal executive officer, ranking elected official or other duly authorized employee.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name (printed): Jeannene Bragg

Title: Town Administrator

Signature: \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'Jeannene Bragg', written over a horizontal line. The signature is cursive and stylized.

Date: \_\_\_\_\_

6-6-08

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## CDPS Stormwater Management Program Descriptions Instructions

### A. Applicability

This template is applicable for all permittees covered under the MS4 general permits COR-080000 and COR-090000. This template is **not** applicable to non-standard MS4s permitted under the COR-070000 general permit.

### B. Filling out the Template

This template is intended to be filled out electronically, with additional lines added to the sections as descriptions are entered.

### C. Submitting the Program Description

A complete program description, including the original signed certification on page 2, must be submitted to the Water Quality Control Division by **June 10, 2008**.

The submittal must include an original signature. E-mailed or faxed copies will **not** be accepted.

### D. Completeness

The form must be completed accurately and in its entirety, or it will be deemed incomplete. This template is intended to be a summary of all of the content for the CDPS Stormwater Management Program Submittal required by Part I.A.6 of the MS4 general permits, COR-080000 and COR-090000. The descriptions provided must be detailed enough for the Water Quality Control Division to determine the permittee's general strategy for complying with the required items in each of the six CDPS Stormwater Management Program Minimum Control Measures (Parts I.B.1-6 of the general permits).

### E. Cited Permit Requirements

Subsection B of this template for each of the six Minimum Control Measures includes citations of the specific permit requirements. Where permit requirements have been significantly modified from the previous versions of the general permits, the new language is identified in the template as either a "Clarified" or "New" permit requirement. Refer to Part II.H of the permit rationales for additional information on these changes.

**ALL NEW PROGRAM ACTIVITIES ARE IDENTIFIED IN BOLD.**

**ALL DISCONTINUED ITEMS ARE IN APPENDIX B.**

Town of Parker	<b>Overall CDPS Stormwater Management Program Perspective</b>	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
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Summary description of the overall water quality concerns, priorities, and goals specific to the permittee that were considered in the development of the CDPS Stormwater Management Program:

Provide information on conditions that were considered in developing your overall program. (Examples: water quality impairments or concerns, other watershed concerns, community specific pollutant concerns,

***Town of Parker Stormwater Program Considerations***

- Safeguard the public welfare through the proper collection, conveyance, and storage of stormwater runoff in a non-damaging and non-life threatening manner.
- Ensure compliance with all applicable water quality regulations related to stormwater runoff to the maximum extent practicable.
- Ensure that all Town municipal separate storm sewer system (MS4) facilities are functioning and maintained to the maximum extent practicable.
- Protect the overall water quality of the Town's water resources.
- Promote the importance of stormwater quality protection to the residents and business owners in the Town.
- Continue to implement programs to control sediment and other pollutants from construction activities, nutrient and pollutant loading from urbanized areas, and phosphorus in the Cherry Creek basin.

Town of Parker	<b>PUBLIC EDUCATION &amp; OUTREACH</b>	STORMWATER DISCHARGES ASSOCIATED WITH MS4s.- Program Descriptions 2008 – 2013
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**A. Program Perspective:** The goal of the Public Education and Outreach Program is to increase public knowledge of local water quality problems caused by urban runoff in order to maintain public support for local stormwater quality programs. This support ranges from individuals changing their daily actions to community backing for all stormwater program elements. The program should take into account pollutants commonly associated with the urban environment.

**B. Permit Requirements**

*The permittee must implement a public education program in an effort to promote behavior change by the public to reduce water quality impacts associated with pollutants in stormwater runoff and illicit discharges that includes: **(Clarified permit requirement)***

- 1) *targeting specific pollutants and pollutant sources determined by the permittee to be impacting, or to have the potential to impact, the beneficial uses of receiving waters;*
- 2) *conducting outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff; and **(Clarified permit requirement)***
- 3) *informing businesses and the general public of the municipality’s prohibitions against, and/or the water quality impacts associated with, illegal discharges and improper disposal of waste.*

**C. Program Elements:** By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s). For “Implementation Year,” provide the year the element will be implemented, or list as “Ongoing.”

1. Forming Partnerships –List and briefly describe any partnerships and memberships and describe their relevance. (Examples: Colorado Stormwater Council, Project Wet, Keep It Clean partnership, local watershed organizations, etc.).

	Public Education Program Element - Partnerships <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
1.a	Colorado Stormwater Council (CSC). The CSC acts as a forum for MS4 permit holders to aid in the development of stormwater programs at local levels.	ongoing

1.b	Colorado Stormwater Council (CSC) - Construction Site Runoff Control Committee. The committee acts as a forum for MS4 permit holders to aid in the education, development, implementation and enforcement of MCM 4: Construction Site Runoff Control.	ongoing
1.c	Colorado Stormwater Council (CSC) - Technical Review & Advisory Committee (TRAC). This committee acts as a forum for MS4 permit holders to aid in the development, implementation and monitoring of technical issues associated with local stormwater programs.	ongoing
1.d	Douglas County Stormwater Cooperative. The group acts as a forum for MS4 permit holders in Douglas County to work together to develop tools to help implement successful programs	ongoing
1.e	Cherry Creek Stewardship Partners. The partners promote active stewardship in the Cherry Creek watershed.	ongoing
1.f	Cherry Creek Basin Water Quality Authority (CCBWQA) - Stormwater Subcommittee. This subcommittee preserves water quality in the Cherry Creek Reservoir watershed by sponsoring BMPs in the watershed and offering tools and resources to members.	ongoing
1.g	Cherry Creek Basin Water Quality Authority (CCBWQA) - Technical Advisory Committee (TAC). This committee provides technical oversight on a range of issues relating to stormwater quality management.	ongoing
1.h	Urban Drainage and Flood Control District (UDFCD) Phase II Group. The UDFCD group provides assistance with master plans, capital improvement programs, and maintenance programs.	ongoing
1.i	Colorado Stormwater Excellence Program (CSEP). The CSEP provides guidance to entities regulated under the Stormwater General Permit for Construction Activities on the development and implementation of programs necessary to achieve permit compliance.	ongoing

2. Using Educational Materials and Strategies – List and briefly describe your programs/methods for distributing educational materials or conducting outreach activities that have the goal of promoting changes in behavior to protect water quality.

	Public Education Program Element – Educational Materials and Strategies <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
2.a	Continue to work with the local and regional partnerships that have been established.	ongoing
2.b	Continue to educate each target audience with a variety of distribution materials including the following: <ul style="list-style-type: none"> <li>▪ Residential community - web site, awareness advertisements in a local newspaper, stormwater quality brochure, utilize existing tributary signage, and inlet markers, a stormwater management article in the Town newsletter.</li> <li>▪ Commercial/business sector - The Douglas County Stormwater Cooperative produced carpet cleaning and paint disposal videos on DC8 which are available to all Parker residents, utilize existing tributary signage, and awareness advertisements in a local newspaper</li> </ul>	ongoing

	<ul style="list-style-type: none"> <li>▪ Development community and construction sector—web site, Storm Drainage and Environmental Criteria Manual (SDECM), pre-construction meetings, mass e-mailing (as necessary), and site inspections</li> <li>▪ Local Governments/Other Phase II permittees - Douglas County Stormwater Cooperative, Colorado Stormwater Council, Cherry Creek Stewardship Partners, Cherry Creek Basin Water Quality Authority, Urban Drainage and Flood Control District (UDFCD) Phase II Group, In-house illicit discharge training</li> </ul>	
2.c	Continue outreach through the mass media. The Douglas County Stormwater Cooperative has developed videos for carpet cleaning and paint disposal which are aired to Parker residents. These videos will continue to run monthly on DC8. The Town will consider financial and developmental support to the County if they decide to develop additional videos as necessary. The Town will continue to develop (in partnership with the Douglas County Stormwater Cooperative) and place awareness advertisements in an applicable newspaper(s).	ongoing
2.d	Continue to maintain the stormwater library	ongoing
2.e	Continue to offer a Stormwater Hotline	ongoing
2.f	Continue to maintain existing tributary signage	ongoing
2.g	<b>Work with the Douglas County Stormwater Cooperative partners to develop and distribute additional outreach materials, as applicable and as resources allow.</b>	<b>ongoing</b>
2.h	The Town's Stormwater Division will continue to meet bi-weekly to discuss multiple stormwater management issues including PEO opportunities. Staff from other departments, including Parker Community Affairs, will continue to contribute to this group and PEO.	ongoing

3. Signage and Stenciling –List and briefly describe any outreach incorporating signage, inlet stenciling, etc. As applicable, include in the description any commitments to maintain and/or replace signage and stenciling as necessary, including those implemented under the previous permit.

	Public Education Program Element – Signage and Stenciling <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
3.a	The Town will continue to provide the necessary maintenance for the existing signs that name the major tributaries at roadway crossings.	ongoing
3.b	<b>Storm drain markers have been placed on all of the storm inlets within the Town's right-of-ways and some “private” inlets. The Town may continue to place the markers on additional “private” inlets if resources allow. The Town will continue to provide maintenance of the markers as necessary.</b>	<b>ongoing</b>

4. Reaching Diverse Audiences – Describe how the program elements listed in the tables in Items 1, 2, and 3, above, are providing outreach to diverse audiences. Provide in your descriptions cross references to the applicable program elements listed in the tables. Examples: using

bilingual materials, free household chemical collection, events are free and open to public, information and materials distributed are free and readily available, etc.

***Program Description***

- The program elements listed under the “Public Education Program Element – Partnerships” provide outreach to a diverse audience that includes those professionals in the stormwater management industry who serve on the committees and/or organizations listed in table 1. These professionals are able to then go back to their communities and/or places of work and convey the information that is shared at the committee and organization meetings.
- The program elements listed under the “Public Education Program Element – Educational Materials and Strategies” provide outreach to a diverse audience that includes those groups that utilize the educational materials that are provided. These groups are from the following communities and are reached by the following outreach methods:
  - Residential Community - web site, awareness advertisements in a local newspaper, stormwater quality brochure, utilizing existing tributary signage, inlet markers, a stormwater management article in the Town newsletter.
  - Commercial/business sector – web site, awareness advertisements in a local newspaper, utilizing existing tributary signage and inlet markers. Also, the Douglas County Stormwater Cooperative produced a carpet cleaning and paint disposal videos on DC8 which are made available to all Parker businesses with cable TV access.
  - Development community and construction sector—web site, Storm Drainage and Environmental Criteria Manual (SDECM), the “*Constructing BMPs effectively*” brochure that is attached to all grading permit application packets, pre-construction meetings, mass e-mailing (if necessary) and site inspections.
  - Other Phase II permittees - Douglas County Stormwater Cooperative, Colorado Stormwater Council, Cherry Creek Stewardship Partners, Cherry Creek Basin Water Quality Authority, Urban Drainage and Flood Control District (UDFCD) Phase II Group

The Town offers most of their materials free of charge and materials are readily available on the web site. The Town, in conjunction with the Tri-County Health Department, also offers an annual household hazardous waste collection program for a nominal fee.

5. Illicit Discharge Education to Businesses and the Public– Describe how the program elements listed in the tables in Items 1, 2, and 3, above, inform businesses and the general public of impacts associated with illegal discharges and improper disposal of waste. Provide in your descriptions cross references to the applicable program elements listed in the tables. Examples: distributing educational materials, maintaining a website with applicable information, offering household chemical curbside pickup service, coordination with Industrial Pretreatment Program for business inspections, publishing or distributing information targeting specific business sectors, etc.

***Program Description***

The Town informs business and citizens of the impacts of illegal discharges and improper disposal of waste through the following elements:

- Placing door hangers on the front doors of residences that are in the vicinity of an illegal discharge
- *A Citizens Guide to Reducing Stormwater Pollution* which is a brochure available to citizens and businesses that in part, discusses illegal discharges
- Providing our phone number on the inlet markers to give business owners and citizens the opportunity to contact us if they have questions about illegal discharges and improper waste disposal
- Videos that air on DC8—carpet cleaning and paint disposal
- Awareness advertisements, developed with the Douglas County Stormwater Cooperative, published in local newspapers
- Illicit discharges page on the Town's web site
- Annual household hazardous materials and waste collection program
- Illicit discharge investigations and follow up

6. Additional Requirements - Cherry Creek Reservoir Basin discharges (COR-080000 only) –  
 Describe how the program elements listed in the tables in Items 1, 2, and 3, meet the additional education requirements for discharges to the Cherry Creek Reservoir Basin in Part I.B.1(a)(4) of COR-080000. Provide in your descriptions cross references to the applicable program elements listed in the tables. Specifically describe how the program elements result in the distribution of educational materials or equivalent outreach that address pollutant sources that have a significant potential to contribute phosphorus and nitrogen loads to State waters at a rate that could result in, or threaten to result in, exceedance of the chlorophyll a standard in Cherry Creek Reservoir. The outreach should focus on residential, industrial, agricultural, and/or commercial sources within the MS4.

***Program Description***

The Town distributes a variety of educational materials that focus on residential, commercial and developmental sources that have the potential to contribute phosphorus and nitrogen loads to state water in the Cherry Creek reservoir basin. Examples include the following:

- a. Residential community—web site, awareness advertisements in a local newspaper specific to phosphorus and nitrogen loads, stormwater quality brochure that mentions the concern with products that contain phosphorus and nitrogen, utilize existing tributary signage, household hazardous materials and waste collection program that will accept left-over products that contain phosphorous and nitrogen, illicit discharge investigations and follow up, and inlet markers
- b. Commercial/business sector— web site, illicit discharge investigations and follow up, awareness advertisements in a local newspaper specific to phosphorous and nitrogen loads, and utilize existing tributary signage
- c. Development community and construction sector—web site, Storm Drainage and Environmental Criteria Manual (SDECM), pre-construction meetings, mass e-mailing (if necessary), site inspections, illicit discharge investigations and follow up, and awareness advertisements in a local newspaper specific to phosphorus and nitrogen loads

The Cherry Creek Stewardship Partners distributes educational materials and organizes events that educate participants on pollutant sources, such as nitrogen and phosphorus. The Town is unable to commit to a certain number of outreach materials developed or events conducted because Cherry Creek Stewardship Partners organizes those activities and their budget varies. The Town will continue

to support the partners, both financially and technically.

The Town has very few industrial or agricultural facilities. As a result, we have determined that they are not a significant source of chlorophyll a.

**D. Measurable Goals**

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

**SEE ABOVE TABLES FOR NEW ACTIVITIES IN BOLD TEXT AND THE ASSOCIATE MEASUABLE GOALS**

Town of Parker	<b>PUBLIC PARTICIPATION / INVOLVMENT</b>	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
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**II. PUBLIC PARTICIPATION/INVOLVMENT**

**A. Program Perspective**

Public participation/involvement is often discussed in the context of the public education measure because they share a common goal – reaching out to citizens to improve awareness and achieve program compliance. The distinction between the two programs is that public participation/involvement provides a conduit for citizens to participate in the development and implementation of the publicly funded stormwater program.

**B. Permit Requirements**

*Public involvement/participation. The permittee must implement a public involvement program as follows:*

- 1) *The permittee must comply with the State and local public notice requirements when implementing the CDPS Stormwater Management Programs required under this permit. Notice of all public hearings should be published in a community publication or newspaper of general circulation, to provide opportunities for public involvement that reach a majority of citizens through the notification process.*
- 2) *The permittee must provide a mechanism and process to allow the public to review and provide input on the CDPS Stormwater Management Program.*

**C. Program Elements:** By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s). For “Implementation Year,” provide the year the element will be implemented, or list as “Ongoing.”

1. Public Notices –List your local public notice requirements.

<p><b><i>Program Description</i></b>  The Town complies with all legally required public notice procedures for activities that involve or impact the public. The <i>Parker Municipal Code</i> (Chapter 1.04) &amp; the <i>Town Charter</i> (Section 7.5) outlines public notice procedures.</p>
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2. Mechanism and Processes for Public Involvement/Feedback –List and briefly describe your method(s) of publicizing contact information and directing inquires to appropriate staff. Examples are website, brochure, phone book listing, internal phone lists, hot line, etc.

	Public Involvement/Participation Program Element – Public Feedback <i>List each program element, briefly describe. Provide the year(s) for implementation or state “ongoing” for currently implemented programs.</i>	Implementation Year or “Ongoing”
2.a	Continue to post public notifications as needed and as required to allow the public an opportunity to participate in meetings and provide feedback for Town planning (Master Planning)	Ongoing
2.b	Continue to utilize the existing Town website to post public meetings to allow the public an opportunity to participate in meetings and provide feedback for Town planning	Ongoing
2.c	Continue to post Council agendas in Town facilities (e.g., Town Hall.....)	Ongoing
2.d	Continue participation with the local and regional partnerships. The partnerships will be with those listed in the public education and outreach section.	Ongoing
2.e	Continue the Stormwater Hotline which provides access to the appropriate staff	Ongoing
2.f	Continue the stormwater e-mail link on the Town’s website which provides access to the appropriate staff.	Ongoing
2.g	In conjunction with other agencies, the Town will continue to offer a Household Chemical Waste Collection (HCWC) Day.	Ongoing
2.h	Continue participation on the task force (the Douglas County Stormwater Cooperative) to explore long term HCWC strategies. The Town partners with the Douglas County Stormwater Cooperative for this effort because any long term strategies would most likely come from a partnership of several participating agencies.	Ongoing
2.i	Storm drain markers have been placed on all of the storm inlets within the Town’s right-of-ways and some “private” inlets. The Town may continue to place the markers on additional “private” inlets if resources allow. The Town will continue to provide maintenance of the markers as necessary.	Ongoing
2.j	<b>Post the new Stormwater Management Program Description Document on the Town’s website and solicit comments</b>	<b>December 31, 2008</b>

#### D. Measurable Goals

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

Town of Parker	<b>ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
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**A. Program Perspective**

The goal of the Illicit Discharge Detection and Elimination Program is, to the maximum extent practicable, to reduce the frequency and environmental impact of illicit discharges in which pollutants are intentionally or accidentally discharged into the storm sewer system.

**B. Permit Requirements**

*The permittee must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 61.2) into the permittee's MS4. Illicit discharges do not include discharges or flows from fire fighting activities, or other activities specifically authorized by a separate CDPS permit.*

*The permittee must:*

- 1) *Develop and maintain a current storm sewer system map, showing the location of all municipal storm sewer outfalls and the names and locations of all state waters that receive discharges from those outfalls.*
- 2) *To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges (except those identified in subparagraph 5 and 6 of this section) into the storm sewer system, and implement appropriate enforcement procedures and actions. (Clarified permit requirement)*
- 3) *Develop, implement, and document a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping, to the system. The plan must include the following three components: procedures for locating priority areas likely to have illicit discharges, including areas with higher likelihood of illicit connections; procedures for tracing the source of an illicit discharge; and procedures for removing the source of the discharge.*
- 4) *Develop and implement a program to train municipal staff to recognize and appropriately respond to illicit discharges observed during typical duties. The program must address who will be likely to make such observations and therefore receive training, and how staff will report observed suspected illicit discharges. (New permit requirement)*
  - i) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirement of subparagraph (4) by no later than December 31, 2009.*
- 5) *Address the following categories of non-stormwater discharges or flows (i.e., illicit discharges) only if the permittee identifies them as significant contributors of pollutants to the permittee's MS4: landscape irrigation, lawn watering, diverted stream flows, irrigation return flow, rising*

*ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, springs, flows from riparian habitats and wetlands, water line flushing, discharges from potable water sources, foundation drains, air conditioning condensation, water from crawl space pumps, footing drains, individual residential car washing, dechlorinated swimming pool discharges, and water incidental to street sweeping (including associated side walks and medians) and that is not associated with construction.*  
**(Clarified permit requirement)**

*The permittee may also develop a list of occasional incidental non-stormwater discharges similar to those in the above paragraph, (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-stormwater discharges must not be reasonably expected (based on information available to the permittee) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions the permittee has established for allowing these discharges to the MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs, etc.). The permittee must document in their program any local controls or conditions placed on the discharges. The permittee must include a provision prohibiting any individual non-stormwater discharge that is determined to be contributing significant amounts of pollutants to the MS4.*

- 6) *The following sources are excluded from the prohibition against non-stormwater discharges and the requirements of subsections (2) and (3) above:*
- i) Discharges resulting from emergency fire fighting activities. Such discharges are specifically authorized under this permit (see Part I.A.2).*
  - ii) Discharges specifically authorized by a separate CDPS permit.*

**C. Program Elements:** By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2 of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Outfall map -. Describe the status of your outfall map; i.e., has it been completed as required by the previous permit? Briefly describe the process that has been implemented for updates to the map when new outfalls are constructed.

<b><i>Program Description</i></b>
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The Town has mapped all MS4 outfalls within the permit boundary. Updates are made within a reasonable time frame when new outfalls are constructed.
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2. Regulatory mechanism –List all ordinances (or other applicable controls) used to implement the Illicit Discharge Detection and Elimination program. For all ordinances/controls, provide the title, date of adoption/revision, and a brief description of the authority granted (e.g., provides enforcement authority, inspection authority, etc.).

<b><i>Program Description</i></b>
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The Town is able to prohibit illicit discharges to their MS4, as well as enforce the elimination and mitigation of any illicit discharges that may occur, through the following two regulatory mechanisms:

**Regulatory Mechanism #1:** Chapter 6.01. (Health and Safety - Nuisances) of the *Town of Parker Municipal Code* states, "It shall be the policy of the Town to promote the health, safety, morals, convenience, order, prosperity and welfare of the present and future inhabitants of the Town and, therefore, the Town Council declares that every public nuisance shall be unlawful and shall be restrained, prevented, abated and enjoined (Ordinance 5.24 & 1 (1), 1988). A public nuisance includes "any unlawful pollution or contamination of any surface or subsurface waters in the Town..." Litter is defined as "any liquid except clean water." Public or private property includes, but is not limited to, "the right-of-way of any road or highway, any body of water or watercourse, including frozen areas or the shores of beaches thereof, any park, playground or building, any refuge, any school grounds, school building or property used for school purposes" (Ordinance 5.24 & 1 (2), 1988).

The Town Code Enforcement Division as well as select employees in the Public Works Department can obtain authorization by the Mayor or Chief of Police to inspect, examine and enforce against any public or private property in the Town for the purpose of ascertaining the nature and existence of any nuisance.

**Regulatory Mechanism #2:** Chapter 8.05.050 (Criminal Code - Contamination of Water) of the *Town of Parker Municipal Code* states, "It is unlawful for any person to throw or deposit or cause or permit to be thrown or deposited in any stream, storm or sanitary sewer, ditch, pond, well, cistern, trough, or other body of water, whether artificially or naturally created, or so near thereto as to be liable to pollute the water thereof, any offal composed of animal, sewage, excrement or garbage, trash or debris, any water, fuel, oil or other petroleum based product, paint, chemical, whether liquid or solid, scrap construction material or any other materials that may cause water to become contaminated. (Ordinance 5.06.4 & 2 (3-55), 1989)

The Town Police Department has inspection and enforcement authority over the Town's Criminal Code.

3. Illicit Discharge Detection and Elimination Plan –Briefly describe plans and procedures in place for the following required actions:
- Locating priority areas likely to have illicit discharges
  - Tracing the source of illicit discharges
  - Removing the source of illicit discharges

#### ***Program Description***

**The following guidelines were considered for identifying priority areas likely to have illicit discharges:**

- Commercial/industrial areas: These areas have been found in some communities' IDDE programs to (a) have significant numbers of illicit connections and/or (b) have discharges with a high potential to affect water quality. Specific business sectors can be prioritized (e.g., businesses subject to waste water pretreatment rules, businesses falling under certain Standard Industrial Classification [SIC] codes, or business sectors with a record of enforcement actions).
- Older areas of the Town: Older development may predate more stringent construction codes

regarding illegal connections and may have deteriorating sanitary sewer and/or storm sewer infrastructure that can lead to infiltration problems.

- Areas where there have been repeated complaints: Areas where illegal dumping or apparently contaminated discharges have been reported are obvious priority targets.
- Locations identified from ambient water quality sampling data: The locations of high levels of particular contaminants (e.g., bacteria) can help to target priority outfalls. Good resources for this information are the periodic water quality assessment reports (“305(b) reports”) and lists of impaired water (“303(d) lists”) that the CWA requires each state to prepare and submit to the EPA.

**The following guidelines were considered for tracing the source of illicit discharges:**

- Reported in Mapped MS4 area: Reports received in a Town MS4 area that has been previously mapped can be traced using the stormwater facility map booklets. The map booklets will allow the user to move upstream or downstream from the sighting of the illicit discharge.
- Inactive Illicit Discharge Reporting: Through field observation or citizen reporting there may be the instance where an illicit discharge is untraceable or within drainage facilities that have not been mapped. There are a variety of techniques available for use in tracing an illicit discharge. In addition to the ones mentioned above, the following techniques may be considered:
  - A. Manhole Observations: By using the MS4 map to obtain any information that may be available for the area in question, the inspector can check the next “upstream” manhole with a junction to see if there is evidence of discharge.
  - B. Video Inspection: Mobile video cameras can be guided remotely through storm sewer lines to observe possible illegal connections into storm sewer systems and record observations on a videocassette or DVD.
  - C. Smoke Testing: This technique involves injecting non-toxic smoke into storm sewer lines and then noting the emergence of smoke from sanitary sewer vents in illegally connected buildings or from cracks and leaks in the storm sewer lines.
  - D. Dye Testing: This technique involves flushing non-toxic dye into toilets and sinks and observing storm sewer and sanitary sewer manholes and storm sewer outfalls for the presence of the dye.
  - E. Aerial Infrared and Thermal Photography: Aerial infrared and/or thermal photography can be used to locate illicit discharges from outfalls and failing septic systems using temperature and vegetation as markers.

**The following guidelines were considered for removing the source of the illicit discharges:**

- Voluntary Compliance: Often, home or business owners are not aware of the existence of illegal connections between their buildings and the storm sewer systems. In these cases, providing the responsible party with information about the connection, its environmental consequences, the applicable regulations, and how to remedy it may be enough to secure voluntary compliance.

- Enforcement: Based upon the findings of the responding staff member, it may be necessary to proceed with the IDDE enforcement steps as defined in the *Town of Parker Municipal Code*.
- Proper construction and maintenance of MS4s: Some illicit discharge problems may be the responsibility of the Town and Special Districts. These problems include cross-connections between the sanitary sewer and storm sewer systems and infiltration into damaged or deteriorating storm sewer pipes.

4. Staff Education – List program(s) to educate staff and contractors in the field on observing, reporting, and responding to illicit discharges. You may provide a cross reference to the Municipal Operations program if this program element is covered there. Briefly describe the type (e.g., class room, web based, briefings, etc) and frequency of training program(s) conducted. If training has not been fully implemented, provide a measurable goal in Part D, below.

***Program Description***

The Town uses classroom training for the appropriate field employees on the IDDE manual and the applicable procedures for observing, reporting, and responding to illicit discharges. Detailed training presentations specific to illicit discharge response will typically occur once a permit term because there is little employee turnover, but will be held more often if necessary. In addition, illicit discharges and spill prevention, identification, and clean-up are covered in a less detailed manner during the annual training listed under the pollution prevention/good housekeeping program.

**D. Measurable Goals**

Measurable Goals are required for Staff Education as per Part I.B.3(a)(4) of the permit (Permit Requirement (4), in Part B, above), unless this new permit condition is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

**Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.**

1. Staff training program(s) listed in Part C.4, above, have been fully implemented and are ongoing.  
 **(It is not necessary to complete Part 3 below if you check this box.)**
2. One or more staff training program(s) have **NOT** been fully implemented and measurable goals have been provided in Part 3 below for each of the pending programs.  
 **(You must complete Part 3 below if you check this box.)**
3. Illicit Discharge Detection and Elimination Measurable Goals: Include those staff training program(s) that have **NOT** already been fully implemented, and provide the year by which implementation will occur. **Measurable Goals must be completed by 2009.**

Illicit Discharge Detection and Elimination Measurable Goals - Training	Implementation
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	<i>List each program element, briefly describe. Provide the year(s) for implementation</i>	Year

Town of Parker	<b>CONSTRUCTION SITES RUNOFF CONTROL</b>	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
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### A. Program Perspective

The goal of the Construction Sites Runoff Control Program is to reduce, to the maximum extent practicable, sediment and other construction-related pollutants from entering the municipal separate storm sewer system.

### B. Permit Requirements

*The permittee must:*

- 1) *Develop, implement, and enforce a program to reduce pollutants in any stormwater runoff, and to reduce pollutants in, or prevent when required in accordance with I.B.3, non-stormwater discharges that have the potential to result in water quality impacts (e.g., construction dewatering, wash water, etc.), to the MS4 from construction activities that result in a land disturbance of one or more acres. Reduction of pollutants in discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one or more acres. If the Division waives requirements for stormwater discharges associated with a small construction activity in accordance with 61.3(2)(f)(ii)(B) (the "R-Factor" waiver), the permittee is not required to develop, implement, and/ or enforce its program to reduce pollutant discharges from such a site. **(Clarified permit requirement)***
  
- 2) *Develop and implement the program to assure adequate design, implementation, and maintenance of BMP's at construction sites within the MS4 to reduce pollutant discharges and protect water quality. The program must include, at a minimum, the development, implementation, and documentation of:*
  - i) *Program Requirements, including:*
    - A) *An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions and procedures adequate to ensure compliance, to the extent allowable under State or local law.*
    - B) *Requirements for construction site operators to implement appropriate erosion and sediment control BMP's.*
    - C) *Requirements for construction site operators to implement BMP's to control waste such as discarded building materials, concrete truck washout, chemicals, litter, sanitary waste, and other non-stormwater discharges including construction dewatering and wash water, at the construction site that may cause adverse impacts to water quality. **(Clarified permit requirement)***

ii) *Compliance Assessment, including:*

- A) *Procedures for site plan review which incorporate consideration of potential water quality impacts.*
- B) *Procedures for construction site compliance assessment, including:*
  - 1) *Site inspections; and*
  - 2) *Receipt and consideration of information submitted by the public.*

iii) *Compliance Assurance, including:*

- A) *Procedures for enforcement of control measures that includes documented procedures for response to violations of the permittee's program requirements. Procedures must include specific processes and sanctions adequate to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures. **(New permit requirement)***
  - 1) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirement of subparagraph (A) to develop, document and implement response procedures that specifically address chronic and recalcitrant violators by no later than December 31, 2009.*
- B) *An education and training program for municipalities, their representatives and/or construction contractors. At a minimum, the program must include an information program for construction site operators unfamiliar with the reviewing authority's regulatory requirements.*

**C. Program Elements:** By using existing, on going program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Regulatory Mechanism to require BMPs and sanctions to ensure compliance – List all ordinances (or other regulatory mechanisms) your Construction Sites program is operating under that allow you to require BMPs and enable sanctions to ensure compliance. For all ordinances/mechanisms, provide the title and date of adoption/revision.

***Program Description***

Chapter 11.10 of the Town's *Municipal Code* provides a mechanism within the Town for the issuance or permits relating to grading and earth movement. Its purpose is to minimize soil erosion and movement of sediment, and to protect the water quality and soil surfaces during and after construction (Ordinance 4.40 & 1, 1986, rev. 1994, rev. 2000). With the issuance of a grading permit through the Town, the permittee is responsible for complying with the technical requirements relating to construction site runoff control, which are outlined in the Town's *Storm Drainage and Environmental Criteria Manual (SDECM)* (1996, rev. 1998, rev. 2002 and as amended). The *SDECM* was adopted by reference into the Town's *Land Development Code* (Chapter 13.10) (Ordinance 3.119.1 & 1, 2002)

which is a section of the Town's *Municipal Code*.

2. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and materials handling BMPs - List the design criteria, BMP manuals, or fact sheets used to guide construction site operators in the selection and design of appropriate BMPs, stabilization methods and materials handling practices. For all items, provide the title and date of adoption/revision.

***Program Description***

The Town uses the *Storm Drainage and Environmental Criteria Manual (SDECM)* (1996, rev. 1998, rev. 2002 and as amended) to guide construction site operators in the selection and design of appropriate BMPs, stabilization methods and materials handling practices. The Town also distributes the, "*Constructing BMPs effectively*" brochure along with the grading permit application packet to serve as a general guide to BMP maintenance. This brochure is a hand-out as part of the grading permit application packet and was not adopted as a separate document.

3. Requirements for construction site operators to control waste including discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste –List all ordinances (or other regulatory mechanisms) used that require construction site waste control. For all ordinances/mechanisms, provide the title and date of adoption/revision.

***Program Description***

The *Storm Drainage and Environmental Criteria Manual (SDECM)* (1996, rev. 1998, rev. 2002 and as amended) has BMP requirements (if applicable to the construction site) for solid wastes, concrete truck washout areas, chemical control, sanitary facilities and other construction site pollutants. The *SDECM* was adopted by reference into the Town's *Land Development Code* (Chapter 13.10) (Ordinance 3.119.1 & 1, 2002) which is a section of the Town's *Municipal Code*.

4. Procedures for site plan review which incorporate consideration of potential water quality impacts –
  - a. Site Plan Development: Briefly describe your requirements for construction site operators to develop stormwater control site plans based on the minimum design criteria.
  - b. Site Plan Review: Briefly describe your site plan submittal, review, and preliminary approval process (e.g., is a checklist used?). Describe your system to track status of stormwater control site plans. Describe procedures for ongoing review of site plans during active construction (e.g., how are plans reviewed after construction starts and is additional approval required for revisions?) The MS4 is not required to review and/or approve all plans, but must demonstrate adequate project oversight to prevent inadequate plans.

Describe how consideration of potential water quality impacts is achieved (e.g., ordinance requires a permit, which requires a plan, which requires that water quality impacts be considered; water quality impacts are required to be addressed by development code; etc.). The MS4 is not required to review and/or approve all plans, but must demonstrate adequate project oversight to prevent inadequate plans.

***Program Description***

The Town's review process includes the use of a checklist and the use of required BMPs for plan approval. An erosion control plan must be submitted for review and acceptance prior to any soil disturbance activities on a site. Sites are inspected as necessary during construction and until the site has been stabilized (vegetation established).

The Town's grading permit process consists of the following steps:

- An erosion control plans, together with a related development plans, is prepared and submitted to the Town for review and acceptance. The erosion control plan depicts site grading and shows the BMPs used to control erosion and sedimentation.
- After the erosion control plan is approved, a completed grading permit application is submitted to the Town.
- The site contractor installs the initial-stage BMPs.
- A preconstruction meeting is held at Town Hall or on site with the Town's inspector and project superintendent in order to review the initial-stage BMPs and discuss the Town's inspection and enforcement process. If the initial-stage BMPs are installed per the specifications of the *Storm Drainage and Environmental Criteria Manual (SDECM)*, the grading permit is released by the Town and construction may begin. Construction is subject to inspections by Town staff in order to provide input regarding modifications or maintenance needed to more effectively control erosion and sedimentation, and enforcement action for non-compliance.
- Removal of indicated BMPs, final seeding and mulching (if called for), and final inspection occurs prior to the contractor leaving the site.
- After final acceptance of vegetative cover and removal of all necessary BMPs, the grading security is released and the project is closed out.

All of the Town's active permit applications and active grading permits are tracked in an electronic database.

The Town's inspector has the ability to approve minor adjustments to the plans in the field. Significant changes to approved plans require that a written request be submitted by the design engineer which is reviewed by the Engineering Division at the Town. The Town then issues a written approval for plan changes.

5. Procedures for receipt and consideration of information submitted by the public. Describe how inquiries are processed (i.e., received by, or forwarded to the MS4 Stormwater Program) and responded to. Describe how complaints are tracked and documented.

***Program Description***

All phone calls, e-mails, office visits, faxes, etc., are directed to the Town's Stormwater Division which is a division of the Town's Engineering Division which is part of the Town's Public Works Department. The applicable Division employee is then responsible for obtaining all necessary information from the contact person. Once the information is gathered, a determination is made as to the appropriate action necessary to address the issue. This may involve a site inspection, notification to a construction site operator, or other follow up as appropriate. If necessary, the original contact person is then contacted and informed of the status of the issue.

6. Procedures for site inspection and enforcement of control measures

- a. Inspections: Describe procedures used for inspections, and list any manuals or other documentation used by your staff that includes inspection procedures. Include a description of how inspections are documented; how the frequency of inspections is determined; how sites are prioritized for inspections, if past experiences with construction site operators influence frequency; and how sites and inspections are tracked. Describe procedures for regularly scheduled compliance inspections, complaint response inspections, and reconnaissance inspections, as applicable to your program.
- b. Enforcement: Describe procedures used for enforcement, and list any manuals, response guides, or other documentation used by your staff that dictate how and when a response to non-compliance is carried out and those enforcement actions are tracked. Describe enforcement tools used (e.g., withholding permits, inspections, plan review, C.O., letter of non-compliance, stop work, permit revocation, notice of violation, monetary fines, summons). Describe how enforcement actions are escalated as needed to prevent repeat violations associated with chronic or recalcitrant violators. If procedures are not already fully implemented to address chronic and recalcitrant violators, provide a measurable goal in Part D, below.

***Program Description***

**Inspection:** The Town's inspector uses a standardized inspection form when performing inspections. Throughout or after the inspection, the inspector will record any violations that are discovered and will record them on the inspection form. The inspector will then indicate on the form as to the time and date when the violations will need to be corrected by. The inspection form is then usually signed by the project superintendent after the inspector has discussed the violations and the time frame given to fix them. The project superintendent then receives a copy of the inspection report for his/her records.

Inspection frequencies and prioritizations are largely dependant upon the size of the site, its location to waterways or other environmentally sensitive areas, any complaints the Town has received about the site relating to storm water quality, the history of compliance on the site, as well as the condition of the site as determined by the various division employees who are on site regularly throughout the construction process. Past experiences with job site operators who had issues with site compliance is factored into inspection frequency. Sites and inspections are tracked electronically.

All construction site run-off control complaints are directed to the Town's erosion control inspector. The inspector is then responsible for obtaining all necessary information from the contact person. Once the information is gathered, a determination is made as to the appropriate action necessary to address the issue. This may involve a site inspection, notification to a construction site operator, or other follow up as appropriate. If necessary and after the situation has been addressed, the original contact person is then contacted and informed of the situation.

**Enforcement:** If the violation(s) that was discovered and documented by the Town's inspector is not complied with by the time and date specified in the inspection report, one of two things will occur: The inspector will either issue a Notice of Intent to Issue Stop Work Order (NOISW) in accordance with the *Town of Parker Nuisance Abatement Checklist* or allow for an extension of the violation(s). The determining factors in these situations rely heavily upon the seriousness of the violation(s) as well as the compliance history of the site. If an extension is granted, the project superintendent will be

allowed additional time to correct the violations. If the violations are not corrected by the follow-up date, a NOISW will be issued. If a NOISW is issued, the inspector will assess a new time frame for the violations to be completed. Upon re-inspecting the site, if the items are not completed, a Stop Work Order is issued and remains in effect for all work on site, other than what is needed to correct the violations. The Stop Work Orders remain in effect until all violations have been corrected and re-inspected and approved by the Town's inspector. Any site personnel refusing to stop working once the Stop Work order has been posted are subject to being ticketed by the Parker Police Department. NOISWs and Stop Work Orders may also be issued without adhering to any of the steps above if the violation(s) pose an immediate and eminent threat to water quality and/or personal safety. Determination of these threats is at the inspector's discretion.

7. Training and Education for Construction Site Operators – This program element must, at a minimum, include an informational program for construction site operators unfamiliar with the MS4's (reviewing authority's) regulatory requirements. Describe how training/education is implemented. Describe the use of any fact sheets, pre-development documents, permit applications, pre-construction meetings, web sites, etc. that outline the MS4 (and/or State) construction requirements pertaining to stormwater.

***Program Description***

The Town uses the following to educate construction site operators:

- SDECM manuals
- Site Specific Erosion Control Plans
- Pre-construction meetings
- Inspections
- "Constructing BMPs effectively" brochure attached to all grading permit application packets

**D. Measurable Goals**

Measurable Goals are required for the requirement in Part I.B.4(a)(2)(iii) of the permit (Permit Requirement (2)(iii) in Part B, above) unless this new permit requirement is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

**Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.**

1. Procedures, as listed in Part C.5.b, above, have already been fully implemented to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.

(It is not necessary to complete Part 3 below if you check this box.)

- 2. Procedures have **NOT** already been fully implemented to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures.  
**X(You must complete Part 3 below if you check this box.)**
  
- 3. Construction Sites Program Measurable Goals: The Measurable Goal has been provided. Include the year by which full implementation of procedures will be achieved to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures will be implemented. **Measurable Goals must be completed by 2009.**

	Construction Sites Program Measurable Goals – Chronic and Recalcitrant Violators <i>Provide the year for implementation</i>	Implementation Year
<b>3.a</b>	<b>Fully Implement procedures to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measures</b>	<b>December 31, 2009</b>

Town of Parker	<p style="text-align: center;"><b>POST-CONSTRUCTION STORMWATER MANAGEMENT</b></p>	<p style="text-align: center;">STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 – 2013</p>
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**A. Program Perspective**

The goal of the Post-Construction Stormwater Management program is to implement planning procedures and enforcement mechanisms to reduce, to the maximum extent practicable, stormwater impacts resulting from areas of new development and significant redevelopment.

**B. Permit Requirements**

*Post-construction stormwater management in new development and redevelopment.*

*The permittee must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts. The permittee must:*

- 1) *Develop, implement, and document strategies which include the use of structural and/or non-structural BMPs appropriate for the community that address the discharge of pollutants from new development and redevelopment projects, and/or that maintain or restore hydrologic conditions at sites to minimize the discharge of pollutants and prevent in-channel impacts associated with increased imperviousness; **(Clarified permit requirement)***
- 2) *Use an ordinance or other regulatory mechanism to address post- construction runoff from new development and redevelopment projects to the extent allowable under State or local law;*
- 3) *Develop, implement, and document procedures to determine if the BMPs required under Item (1), above, are being installed according to specifications. (This may be developed in conjunction with the Construction program area, as described in Part I.B.4);*
- 4) *Develop, Implement, and document procedures to ensure adequate long-term operation and maintenance of BMPs, including procedures to enforce the requirements for other parties to maintain BMPs when necessary; **(Clarified permit requirement)***
- 5) *Develop, implement, and document an enforcement program, which addresses appropriate responses to common noncompliance issues, including those associated with both installation (subparagraph (3), above) and long term operation and maintenance (subparagraph (4), above) of the required control measures; **(Clarified permit requirement)***
- 6) *Develop and implement procedures and mechanisms to track the location of and adequacy of operation of long-term BMPs implemented in accordance with the program. **(Clarified permit requirement)***

**C. Program Elements:** By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2. of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Regulatory mechanism – List all ordinances (or other applicable controls) used to implement the post-construction program. For all ordinances/controls, provide the title, date of adoption/revision, and a brief description of the authority granted (e.g., provides enforcement authority, inspection authority, etc.). The ordinance or other mechanism must have language requiring that new development and significant redevelopment projects disturbing more than or equal to one acre, and those less than one acre but part of a larger common plan of development or sale, incorporate stormwater management BMPs.

***Program Description***

The Town's *Land Development Code* (Chapter 13.10) (Ordinance 3.119.1 & 1, 2002) which is a section of the Town's *Municipal Code* requires the adherence to the *Town of Parker Storm Drainage and Environmental Criteria Manual (SDECM)* (1996, rev. 1998, rev. 2002 and as amended). The *Code* allows for the inspection and enforcement of the requirements pertaining to post-construction BMPs. The *SDECM* requires that new developments and re-developed areas incorporate post-construction BMPs for stormwater management.

2. Design Criteria and Standards– List any SOPs or Design Criteria required, such as Urban Drainage Flood Control District's Volume 3 –BMP Manual, or plan review checklists, for the selection and design of appropriate structural and non-structural BMPs appropriate for the community. List any planning tools such as Master Plans, Comprehensive Plans, Zoning Plans and regional BMPs.

***Program Description***

The *Town of Parker Storm Drainage and Environmental Criteria Manual (SDECM)*, as amended, references the Urban Drainage and Flood Control District's (UDFCD'S) *Urban Storm Drainage Criteria Manual: Volume 3*, as amended. The *SDECM* also lists the design criteria for a variety of permanent BMPs. In addition, the UDFCD, in conjunction with the Town of Parker, has completed Master Drainage Plans, Outfall System Plans, and Flood Hazard Area Delineation studies for several drainageways in the Town. These plans and studies, though not typically directly related to post construction BMPs (they do not provide design criteria and/or standards), are used by the Town and developers as a baseline for stream channel improvements and hydrologic impact analyses that are required during development.

3. Review and Approval Procedures
  - i. Plan Review – Briefly describe your process for review and approval of permanent water quality control plans. Describe your system to track status of plans.

- ii. Field verification – Describe how the correct installation of BMPs is confirmed, and the enforcement procedures used when BMPs have not been built as approved.
- iii. If different procedures are used for municipal projects, roadway construction, etc., include a description here.

***Program Description***

Section 4 of the *Town of Parker Storm Drainage and Environmental Criteria Manual (SDECM)* describes the drainage report review process, which includes a 3 phase process for drainage report approval: sketch plan, preliminary plan and final plan. The design engineer is responsible for following Table 4.4 in the *SDECM* which is a *Checklist for Drainage Report Requirements*. This checklist serves to list of the requirements that the Town asks for as part of the submitted drainage reports. It is through the items in the checklist and subsequently, a completed drainage report that the Town is able to verify the design of the proposed post-construction BMP and make a decision to approve or deny the BMP as designed. If the design is approved, the project moves forward in the development process. If the design is denied, comments are sent back to the engineer, explaining to them the areas of concern. The status of plans are tracked through the Town’s Community Development Department until they are approved for construction.

Inspections of the post-construction BMPs are completed by the applicable Development Review Engineer. There are two levels of acceptance: preliminary acceptance (following construction of the permanent BMP) and final acceptance (following warranty period). If the BMPs have not been built as approved, a letter is sent to the owner, explaining the deficiencies and requesting that they are addressed. If the owner chose not to address the deficiencies, the Town would draw upon the posted financial security and hire a contractor to complete the work as approved.

- 4. Tracking – Describe how permanent BMP locations and maintenance history are tracked.

***Program Description***

Permanent BMP locations and maintenance history are tracked in a database by the Stormwater Division and the database is updated as necessary.

- 5. Requiring long-term operation and maintenance of BMPs – Describe how you require the long-term operation and maintenance of permanent water quality controls. List methods used, such as drainage easements; language on recorded plats requiring legal title holder be responsible for BMP maintenance; legal authority to inspect, require, perform maintenance and recoup costs; requiring creation of HOA or owner’s association; and procedures to determine if BMPs are installed or constructed in accordance with specifications.

***Program Description***

The Town uses one or more of the following to require long-term operation and maintenance of the BMPs: drainage easements; language on recorded plats requiring the legal title holder to be responsible for BMP maintenance; and/or the Town’s legal authority to inspect, require or perform maintenance, and recoup costs to ensure the permanent BMPs are installed and constructed in accordance with the specifications.

- 6. Monitor long-term compliance –

- a. Inspections - Describe your inspection programs, including routine and complaint response inspections.
- b. Enforcement –List appropriate enforcement responses used, such as verbal warning to the developer/property owner, letter of noncompliance, notice of violation, chargeback to contractor for work completed by MS4 representatives, and/or municipal summons.

***Program Description***

The Town performs inspections of all Town maintained post-construction BMPs on an annual basis. Complaint investigations are inspected immediately. An corrective action found is addressed by either the Town (if it is a Town maintained BMP) or the responsible party. Initial contact to the responsible party of a non-complying BMP would be through a letter. If the responsible party fails to correct the issue, the Town would hire a contractor to perform the work and bill the rightful owner for the work.

**D. Measurable Goals**

Inclusion of measurable goals should not be necessary, as the elements described in Part C, above, should constitute full program implementation and a commitment to continue these elements.

Town of Parker	<b>POLLUTION PREVENTION/ GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS</b>	STORMWATER DISCHARGES ASSOCIATED WITH MS4s Program Descriptions 2008 - 2013
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**A. Program Perspective**

The goal of the Pollution Prevention/Good Housekeeping for Municipal Operations program is to reduce, to the maximum extent practicable, the amount and type of pollution that is generated by municipal operations or from municipally-owned property.

**B. Permit Requirements**

*The permittee must develop and implement an operation and maintenance program that includes an employee training component and has the ultimate goal of preventing or reducing pollutants in runoff from municipal operations. The program must also inform public employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations. The program must prevent and/or reduce stormwater pollution from facilities such as streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations and snow disposal areas operated by the permittee, and waste transfer stations, and from activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of municipal facilities, and stormwater system maintenance, as applicable. The permittee must:*

- 1) *Develop and maintain written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations. The program must specifically list the municipal operations (i.e., activities and facilities) that are impacted by this operation and maintenance program. The program must also include a list of industrial facilities the permittee owns or operates that are subject to separate coverage under the State's general stormwater permits for discharges of stormwater associated with industrial activity; **(New permit requirement)***
  - i) *Specific Deadline for Renewal Permittees: Renewal Permittees must comply with the requirements of subparagraph (1) by no later than December 31, 2009.*
- 2) *Develop and implement procedures to provide training to municipal employees as necessary to implement the program under Item 1, above. **(Clarified permit requirement)***

**C. Program Elements:** By using existing, ongoing program elements to meet the permit requirements, the MS4 is committed to continuing each of these program elements. Any changes would require use of the program modification process as outlined in Part I.E.2 of the permit.

Address the existing program elements, including those developed during the first permit term. If elements developed during the first term will be discontinued in the second term, include a brief summary of the discontinued element(s).

1. Implementation of an operation and maintenance program - Describe your Pollution Prevention and Good Housekeeping program. Address how oversight of the program's implementation is conducted (e.g., internal audits or reporting). As discussed in Part D, below, you have until 2009 to develop written procedures for all operations and facilities addressed under the Pollution Prevention/Good Housekeeping program. Most permittees will need to provide a measurable goal to fully audit existing procedures and to document at least some additional procedures to meet this permit requirement. The 2009 Annual Report (due March 10, 2010) must include an inventory of all documented procedures. Therefore, it is not necessary to document all currently existing procedures in this submittal.

***Program Description***

The Town has developed a facility runoff control plan for their Public Works Facility, which at this time, is the only facility in need of a plan. Additional runoff control plans will be completed for applicable new facilities as needed. This facility is inspected once a year and the plan is updated as necessary. The Town also has a street sweeping program and written Standard Operating Procedures (SOPs) for municipal operations. A list of municipal operations requiring the implementation of the SOPs has been developed by the Town.

2. Employee Training program - Describe your program(s) to educate municipal employees on implementing procedures for the Pollution Prevention and Good Housekeeping program.

***Program Description***

Applicable Town employees are trained once a year on municipal pollution prevention and good housekeeping. The training includes the viewing of a video on the subject of municipal pollution prevention and good housekeeping, a quiz and a demonstration on the proper way to clean up minor spills.

**D. Measurable Goals**

Measurable Goals are required as per Part I.B.6(a)(1) of the permit (Permit Requirement (a)(1) in Part B, above), unless this new permit requirement is already being met. Additional measurable goals should not be necessary if the elements described in Part C, above, constitute full program implementation and a commitment to continue these elements for all additional permit requirements.

**Check Box 1 or 2, below. The Table in Part 3 must be filled out if you check Box 2.**

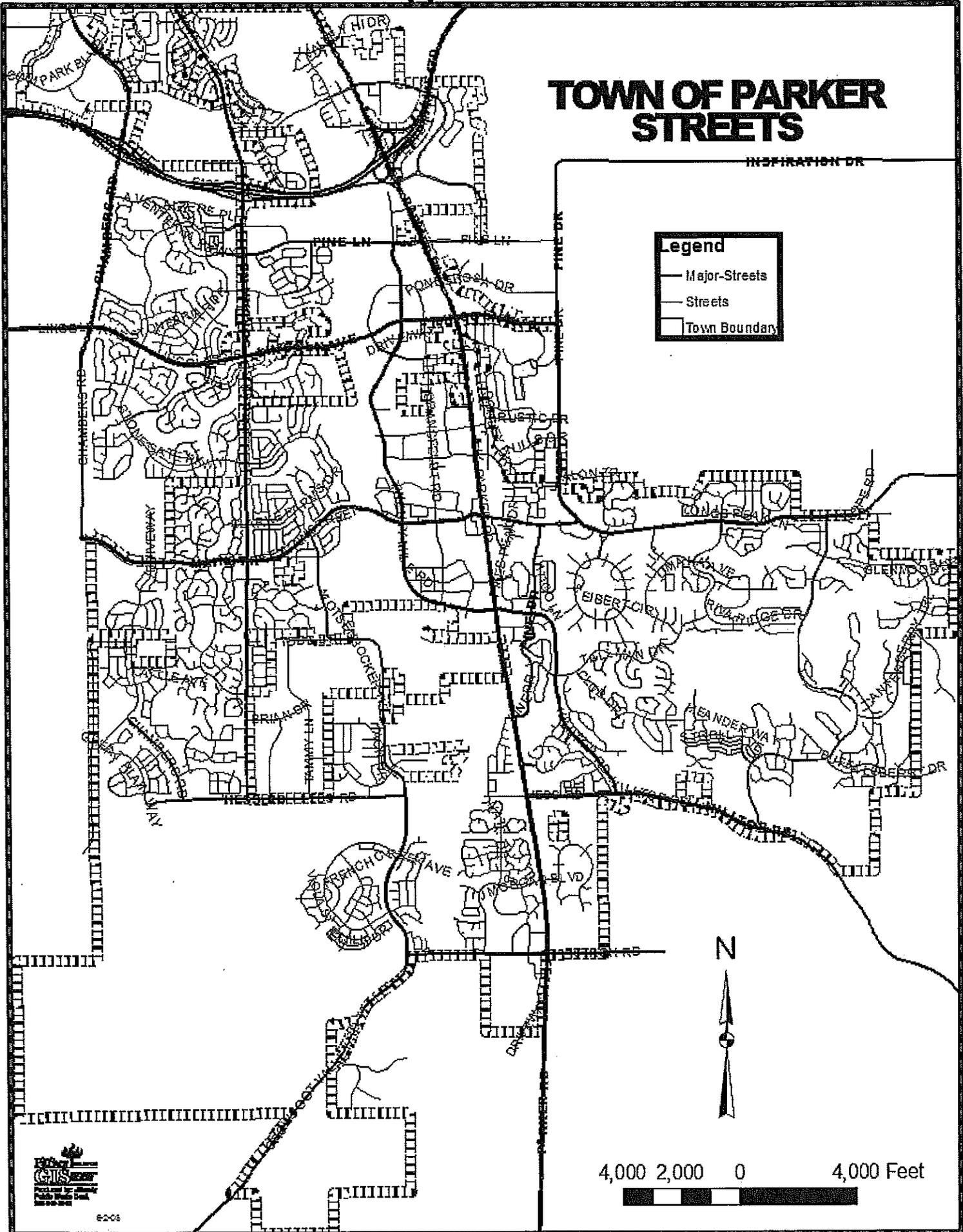
1. Written procedures and lists, as listed in Part C.3, above, for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations, have already been developed.  
 **(It is not necessary to complete Part 3 below if you check this box.)**
2. Written procedures and lists for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations have **NOT** already been fully developed.  
 **(You must complete Part 3 below if you check this box.)**

3. Pollution Prevention/ Good Housekeeping Measurable Goals: The Measurable Goal has been provided. Include the year when written procedures for the implementation of an operation and maintenance program to prevent or reduce pollutants in runoff from the permittee's municipal operations will be fully developed. **Measurable Goals must be completed by 2009.**

	Pollution Prevention/ Good Housekeeping Measurable Goals <i>Provide the year(s) for implementation</i>	Implementation Year
3.a	N/A	

# Appendix A

## TOWN OF PARKER STREETS



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## **APPENDIX B**

### **Public Education and Outreach**

1. Discontinued Element: Mail out the Town's general stormwater quality informational brochure.

Rationale: This is not an effective outreach method. The Town has questioned how many citizens actual read the brochure when it comes in the mail. The brochure will continue to be available at Parker Town Hall.

2. Discontinued Element: Form County-wide public education, participation and outreach.

Rationale: This element has been difficult to implement due to a lack of participation by Douglas County School District. However, the Town will continue to support Project WET (Water Education for Teachers – through the Cherry Creek Stewardship Partners) and the Douglas County School District when possible.

3. Discontinued Element: Work with other Douglas County Phase II Permit holders to have an article on stormwater quality published in the Douglas County Herald.

Rationale: This element is to specific in that the Town is working with other Douglas County Phase II Permit holders on stormwater quality awareness advertisements in various newspapers that the serve the County.

### **Public Participation and Involvement**

1. Discontinued Element: Work with other Douglas County Phase II Permit holders to develop and implement a traveling stormwater management booth for use at a minimum of one fair in Douglas County.

Rationale: The Town has found that the booth is unpopular in non-school room settings.

2. Discontinued Element: The Town will stencil approximately 1 out of every 5 storm drains located within the Town.

Rationale: The Town has installed "awareness markers" on all public storm drains within the Town.