



MINIMUM CONTROL MEASURE 6
Pollution Prevention / Good
Housekeeping for Municipal
Operations



MCM 6: Pollution Prevention / Good Housekeeping for Municipal Operations

The City of Fergus Falls implements a pollution prevention / good housekeeping municipal operations and maintenance program to prevent and/or reduce the discharge of pollutants from the City's owned and/or operated facilities and operations to the their MS4.

The table below provides a list of the pollution prevention / good housekeeping municipal operations and maintenance program best management practices (BMPs) implemented by The City of Fergus Falls.

BMP	Description
Facilities Inventory	The City of Fergus Falls has developed and maintains an inventory of City owned and/or operated facilities.
Municipal Operations BMPs	The City of Fergus Falls has developed, implements and will continue to assess BMPs to help prevent or reduce pollutants in stormwater discharges from the small MS4.
Pond Assessment	The City of Fergus Falls has developed procedures and a schedule to determine the TSS and TP treatment effectiveness of all City owned and/or operated ponds.
Inspections	The City of Fergus Falls conducts inspections of structural stormwater BMPs.
Employee Training Program	The City of Fergus Falls has developed and implements a stormwater management training program.
Pond, Wetland, & Lake Inventory	The City of Fergus Falls has inventoried all known ponds, wetland, and lakes within the City's jurisdiction that collect stormwater via constructed conveyance.
Documentation	The City of Fergus Falls has developed and implements documentation standards, which are included throughout this document.



MCM 6: BMP SUMMARY SHEET

BMP: City-Owned Facilities Inventory

Responsible Person:
Position Title:

BMP Description:

The City of Fergus Falls has developed and maintains an inventory of City-owned and/or operated facilities that may contribute pollutants to stormwater discharges.

Facilities to be inventoried may include, but are not limited to: composting, equipment storage and maintenance, hazardous waste disposal, hazardous waste handling and transfer; landfills, solid waste handling and transfer, parks, pesticide storage, public parking lots, public golf courses, public swimming pools, public works yards, recycling, salt storage, snow storage, vehicle storage and maintenance (e.g., fueling and washing) yards, and materials storage yards.

The City will review and update the facility inventory as necessary to maintain an effective and responsive program.

BMP Activity Log

Date	Description	Notes
2021	Review Facility Inventory	Electronic copy is kept and maintained on City SharePoint site



MCM 6: BMP SUMMARY SHEET

BMP: Municipal Operations BMPs

Responsible Person:
Position Title:

BMP Description:

The City of Fergus Falls has developed, implements and will continue to assess BMPs to help prevent or reduce pollutants in stormwater discharges from the small MS4.

The City will implement BMPs on municipal operations consisting of the following when applicable: waste disposal and storage, including dumpsters, management of temporary and permanent stockpiles of materials such as street sweepings, snow, sand and sediment removal piles (e.g., effective sediment controls at the base of stockpiles on the downgradient perimeter), vehicle fueling, washing, and maintenance, routine street and parking lot sweeping, emergency response, cleaning of maintenance equipment, building exteriors, dumpsters, and the disposal of associated waste and wastewater; use, storage, and disposal of significant materials, landscaping, park, and lawn maintenance, road maintenance, including pothole repair; road shoulder maintenance, pavement marking, sealing, and repaving, right-of-way maintenance, including mowing and application of herbicides, pesticides, and fertilizers.

Salt Storage BMPs

The City will provide additional BMPs at salt storage areas consisting of covering or storing salt indoors, storing salt on impervious surfaces, and reducing exposure the transferring material from salt storage areas (e.g. sweeping, diversions, and/or containment).

City staff are provided with regular training to implement efficient BMPs for water quality when conducting any of the maintenance items listed above.

BMP Activity Log

Date	Description	Notes
2021	BMPs reviewed and added to Facility Inventory	Electronic copy is kept and maintained on City SharePoint site





MCM 6: BMP SUMMARY SHEET

BMP: City-Owned Stormwater Pond Assessment

Responsible Person:

Position Title:



BMP Description:

The City of Fergus Falls has developed procedures and a schedule to determine the TSS and TP treatment effectiveness of all City owned and/or operated ponds and outfalls constructed and used for the collection and treatment of stormwater. The schedule is based on measurable goals and priorities established by the City.

Assessment Procedure:

The following steps may be taken to assess the city pond(s) for TSS and TP treatment effectiveness:

- 1) Conduct pond inspections in accordance with the MS4 permit requirements. Determine if further evaluation is necessary based on inspection findings.
- 2) Gather of Background information. This may include the following:
 - Original design information, if available. (Record drawings, design calculations, etc.)
 - Determination of contributing drainage area.
 - As-built survey information, if completed and available.
 - Other significant information available that pertains to the pond.
- 3) Desktop evaluation of treatment effectiveness.
- 4) Site investigation and/or survey of the existing pond conditions. This may include:
 - Determination of sediment levels in the pond
 - Identification of outlet and inlet details (type, elevations, sizes, etc.)
 - Other significant pond characteristics / details.

Schedule, Measurable Goals, and Priority:

- 1) The City will first conduct at least one inspection of all ponds and outfalls (excluding underground outfalls) at least once per permit term (5 years).
- 2) The City may consider a desktop evaluation of ponds to help prioritize which ponds need further assessment.
- 3) The City has set a goal of inspecting all ponds on a five year schedule, the City may adjust this frequency based on available budget, staff, and/or other factors that may affect the process.
- 4) To help prioritize pond assessments the City will consider the following factors:
Age of pond, contributing drainage area (size, land use, upland treatment, etc.), inspections notes, type and location of receiving water; sensitivity of receiving water
- 5) Based on the inspection findings, the City must determine if repair, replacement or maintenance measures are necessary. Maintenance must be completed as soon as possible. If it is determined that necessary maintenance cannot be completed within **one year of discovery** the City will determine a schedule for completing the maintenance.**

Documentation of Pond Maintenance

If the City performs pond sediment excavation and removal activities the following will be documented:

- 1) A unique ID number and geographic coordinates of each stormwater pond from which sediment is removed
- 2) The volume (e.g., cubic yards) of sediment removed from each stormwater pond
- 3) Results from any testing of sediment from each removal activity
- 4) Location(s) of final disposal of sediment from each stormwater pond.



BMP Activity Log		
Date	Description	Notes



MCM 6: BMP SUMMARY SHEET

BMP: City-Owned Stormwater Infrastructure Inspections

Responsible Person:
Position Title:

BMP Description:

The City of Fergus Falls conducts inspections of their structural stormwater BMPs, outlets and stockpiles and material storage/handling areas to verify structural integrity, proper function and maintenance needs. Inspections will be completed to meet required permit frequency as identified below:

- Annual inspections of structural stormwater BMPs.
- At least one inspection of all ponds and outfalls within permit cycle.
- Quarterly inspections of stockpiles, and storage and material handling areas

Based on inspection findings, the City will determine and document if repair, replacement or maintenance measures are necessary and complete as soon as possible. If maintenance cannot be completed within one year of discovery, the City will document a schedule for completing the maintenance.

Frequency of inspections may be modified depending on:

1. Complaints received or patterns of maintenance indicate a greater frequency is necessary
2. Maintenance or sediment removal is not required after completion of the first two calendar year inspections; in which case the City may reduce the frequency of inspections to once every two (2) calendar years.

BMP Activity Log

Date	Description	Notes
Quarterly	Visual inspections of stockpiles, material storage & handling areas during day-to-day activities.	
Annually	Inspection of structural BMPs	
At least once (5 years)	Inspection of ponds & outlets	



MCM 6: BMP SUMMARY SHEET

BMP: Employee Training

Responsible Person:

Position Title:

BMP Description:

The City of Fergus Falls has developed and implements a stormwater management training program commensurate with employee's job-duties which includes a schedule that establishes initial training for individuals, including new and/or seasonal employees, and recurring training intervals to address changes in procedures, practices, techniques, or requirements.

BMP Activity Log

Date	Description	Notes



Stormwater Management Training Program

Minimum Control Measure	Potential Attendees/ Audience	Potential Topics
MS4 Program SWPPP	<ul style="list-style-type: none"> Administration PW Department City Engineer 	<ul style="list-style-type: none"> Importance of water quality / water quality topics MS4 general permit topics for staff responsibilities
Illicit Discharge Detection and Elimination	<ul style="list-style-type: none"> Administration PW Department Police Fire Seasonal employees Construction site inspectors City Engineer 	<ul style="list-style-type: none"> Illicit discharge detection and tracking Procedures for investigating, locating, and eliminating Procedures for spill response City IDDE priority areas Documentation
Winter Maintenance Training	<ul style="list-style-type: none"> Full-time, seasonal staff performing duties 	<ul style="list-style-type: none"> Attend MPCA Smart Salting Training BMPs to minimize deicing Tools and resources to assist in winter maintenance City ordinance / policies
Construction Site Stormwater Runoff Control & Post-Construction Stormwater Management	<ul style="list-style-type: none"> Administration PW Department City Engineer 	<ul style="list-style-type: none"> City standards City site plan review process Stormwater inspections Procedures for City response to public input Documentation
Pollution Prevention/ Good Housekeeping	<ul style="list-style-type: none"> City Officials Administration PW Department City Engineer 	<ul style="list-style-type: none"> City SWPPP and program documentation Procedures for City response to public input Impacts of stormwater discharges Stormwater related issues Facility BMPs Stormwater inspection

Existing Employee Training Schedule Goal: Annually

New / Seasonal Employee Training Schedule: As soon as practicably possible after hire, with a goal of within two weeks of hire. Initial training will be completed by employee's supervisor.





MCM 6: BMP SUMMARY SHEET

BMP: Pond, Wetland, & Lake Inventory

Responsible Person:
Position Title:

BMP Description:

To meet permit requirements Part III.C.2 the City of Fergus Falls has completed an inventory of:

- 1) All known ponds within the City's jurisdiction that are constructed and operated for the purpose of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances, Stormwater ponds do not include areas of temporary ponding, such as ponds that exists only during a construction project or short-term accumulations of water in road ditches.
- 2) All known wetlands and lakes, within the City's jurisdiction, that collect stormwater via constructed conveyances.

BMP Activity Log

Date	Description	Notes
2021	Review of form	



Documentation Standards

(Permit Section: 21.13 – 21.14)

The City of Fergus Falls' standards for documentation will include the following as required in Section 21.13 of the general permit:

- Date(s) and descriptions of findings, including whether or not an illicit discharge is detected, for all inspections.
- Any adjustment to inspection frequency
- Date(s) and a description of maintenance conducted as a result of inspection findings, including whether or not an illicit discharge is detected
- Schedule for maintenance of structural stormwater BMPs, and outfalls
- Stormwater training events, including general subject matter covered, names and departments of individuals in attendance, and date of each event

The City of Fergus Falls' standards for documentation will include the following as required in Section 21.14 of the general permit:

- Unique ID number and geographic coordinates of each stormwater pond from which sediment is removed
- The volume of sediment removed
- Results from and testing of sediment from each removal activity
- Location(s) of final disposal of sediment from each stormwater pond.

MCM 6 Annual Assessment

(Permit Section: 21.15)

Responsible Person:

Position Title:

The City will annually assess its operations and maintenance program to evaluate program compliance, the status of achieving the measurable requirements in Section 21, and determine how the program might be improved. The City must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

REVISION #	DATE	AUTHOR	SUMMARY OF CHANGES
I	April 2021	Tara Ostendorf	Original Document


