

Stormwater Management Plans, 2021-2024
City of Manhattan, Kansas. MS4 Permit
[draft for Public Comment 1/28/2021]

City Reference ID	KDHE BMP Reference ID and Title	BMP Description and KDHE Requirements	City's Implementation Plan
<i>Public Education and Outreach</i>			
1.A	P Ed & O - 01: Webpage	Maintain a webpage with up to date information, with all links effective and valid information. Check links and update on a monthly basis. Document monthly checks in log book and indicate changes with logged summaries. Maintain the webpage throughout the year (12 month basis).	A stormwater webpage is already in operation and will be maintained throughout the permit term. (Planning for 3 points in 2021 and 2 points in remaining years.)
1.B	P Ed & O - 05: Posting Permit	Post the city's MS4 permit and SMP document on our stormwater webpage. Both documents must be posted for at least 6 months of the year.	Both documents will be posted by February 28, 2021 and will remain on the webpage throughout the permit term. (Planning for 1 point each year.)
1.C	P Ed & O - 06: Hotline/Reporting System	Provide either a stormwater telephone hotline or web based or text message method for public reporting of illicit discharges. Respond to all reported complaints within 10 days, and if valid, resolve or establish a schedule for resolution within 20 days. Document complaints and response/resolution process for all complaints received in the year. (See full permit for more details on resolutions).	A stormwater telephone hotline and the City's "Report It" web are both already in use. A website-based reporting tool will be maintained throughout the permit term. Due to limited usage, the telephone hotline may be phased out. The current method of response already adhered to these timelines, but Operating Procedures will be refined in 2021 to address schedule and reporting. (Planning for a minimum of 2 points each year. Up to 2 additional points may be claimed in select years for illicit discharges that are resolved).

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1.D	P Ed & O - 07: Education for Small Groups	Provide educational material annually to at least four groups, including each of the following types: Residents, Business-Institutions-Commercial Entities-Developers, and Industrial Facilities. The educational material may be provided as any of the following: brochures, flyers, e-mails, and press releases. Identify and educate groups each year, developing topics that are group specific and address activities and/or pollutants of concern. All the requirements for sending educational materials to the various groups targeted for a specific year must be completed in that year.	Outreach to individual groups has already been a part of our program, and will continue, but full implementation of this BMP will begin no later than the 2023 permit year, building upon existing or newly identified networks and groups. Preliminary planning and coordination will begin in 2022. (Planning for 3 points each in 2023 and 2024).
1.E	P Ed & O - 15: Social Media	Develop or participate in an ongoing social media program on pertinent stormwater public education topics. Publish or share social media content on the City's social media accounts at least 6 times per year. Record post topic, the number of impressions and engagement for each post. Include link to City's stormwater education website (webpage).	The City already has an active social media presence which has included stormwater related postings, and current activities will continue. Full implementation of this BMP will begin no later than the 2023 permit year. Preliminary planning and coordination, including for documentation systems, will begin in 2022. (Planning for 2 points in each 2023 and 2024)

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<i>Public Involvement and Participation</i>			
2.A	P I/P - 01: Public Forum	Hold a public hearing or public forum to notify the public about stormwater program activities and to solicit public comment regarding stormwater issues. Provide public notice, invite local news media, and document the hearing (forum) with attendance sign-in sheet and minutes of the hearing (forum) which includes public comments and responses. Retain copies the documents.	The City will plan to hold a public forum in 2021 and each year of the permit thereafter. The forum may be held to satisfy multiple BMP requirements. The exact nature of the forum in 2021 may be influenced by public health restrictions. (Planning 2 points in each 2021 to 2024)
2.B	P I/P - 03: Park or Stream Cleanup	Hold park or stream bank clean-up events for public volunteers to aid municipal staff in removing trash, debris, or pollutant sources from the select clean-up area. Are to clean must be equal or greater than 1 acre, or alternatively at least 200 yards of streambank.	At least one activity of this type will be held in 2023 and 2024. Similar or precursor events may be held in years prior. (Planning 3 points in each 2023 and 2024)
2.C	P I/P - 07: Pet Waste Ordinance	Enact either an ordinance, resolution, or other enforceable requirement that requies pet owners or their keepers to immediately and properly dispose of their pet's solid waste deposited at parks or rest areas owned by the permittee. Post signs informing the public of their obligation at the park. Installation of a pet waste bag dispenser in public areas qualifies as adequate signage.	Manhattan Municipal Code prohibits improper disposal of pet wastes. Signage for pet wastes is already present in most City Parks. A review of sign placements will be made in 2021 and additional signage, if needed, will be added in 2022. (Planning 1 point in each year 2021 through 2024).

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<i>Illicit Discharge Detection & Elimination</i>			
3.A	IDD&E - 01: Public Forum	Hold a public hearing or public forum to educate the public about illicit discharges and alternate acceptable methods of disposal or reuse of substances and/or materials. Provide public notice of the hearing/forum, invite local news media, and document the hearing (forum) with sign-in sheets, minutes and questions/comments from attendees and answers/comments from staff.	The City will plan to hold a public forum in 2021 and each year of the permit thereafter. The same forum held for BMP 2.A will likely be combined with this. The exact nature of the forum in 2021 may be influenced by public health restrictions. (Planning 2 points in each 2021 to 2024)
3.B	IDD&E - 03: Spill Response Plan	Develop a spill response and, if appropriate, coordinate emergency response with other agencies or organizations. Plan shall include an explanation of appropriate spill response activities for spills associated with vehicles accidents, at grade or above ground storage tanks, and vehicle fluids from mechanical equipment such as construction equipment, cars and trucks. The written plan shall be maintained on file.	City departments will coordinate internally and with other agency partners on this topic, to review existing spill response plans and procedures and make updates as appropriate. This activity is planned for the 2023 permit year, and the plan remain in effect through 2024. (Planning 2 points in each 2023 and 2024)
3.C	IDD&E - 03: Dry Weather Outfall Inspections	Implement a program to evaluate MS4 outfalls to identify illicit discharges. Inspect at least 5% of known MS4 outfalls during a calendar year and evaluate the ones which have dry weather flows. (See permit for more detailed discussions).	A minimum of 5% of the City's known MS4 outfalls (approximately 43) will be inspected annually to search for illicit discharges. The City's GIS atlas was recently revised to better identify our estimated 850 known outfalls. (Planning 1 point in each year 2021 to 2024. Additional points will be claimed when illicit discharges are found and eliminated.)

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3.D	IDD&E - 07: Household Hazardous Wastes	Implement a Household Hazardous Waste collection Program (HHWCP) or document other have implemented such a program to provide such service to all property owners or residents located within the permit area. Document that residents and property owners were able to dispose of such wastes during and throughout the calendar year.	HHWCP services are currently provided to City residents and property owners through the Riley County Solid Waste management program. The City will coordinate with Riley County to ensure that this program or its equivalent continues through the permit term. (Planning 3 points each in years 2021 to 2024).
<i>Construction Site Stormwater Runoff Control</i>			
4.A	CSSRC - 01: Require SESC Plan	Implement a requirement for a Soil Erosion and Sediment Control (SESC) Plan for any land disturbance sites which are either equal to or greater than 1 acre, or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs more than one acre. Compliance measured by the enactment of a regulatory ordinance or other enforceable measure.	This requirement already exists in the City, under Manhattan Municipal Code. The requirement will remain effective throughout the permit term. (Planning 3 points in 2021, and 2 points in each of the years following).
4.B	CSSRC - 02: SESC Design Manual	Develop and adopt a design manual for erosion and sediment control BMPs which are required. Require implementation of the BMPs in compliance with the manual on all sites which meet the disturbed area standard specified in BMP 4.A.	The city current requires that SESC plans developed utilize KDHE permit requirements, including the design resources specified in the KDHE Construction Activities General Permit, as well as KDOT and other industry standards, along with the comment and response process in our project reviews. This process has been adequate to date. The City will examine our design standards in 2024 to determine if more formal adoption of additional resources is required. (Planning 3 points in 2024)

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4.C	CSSRC - 03: SWP2 Training	Provide access to a least one training class for contractors, developers or others involved with land disturbance projects which provides training on requirements for a Stormwater Pollution Prevent Plan (SWP2 Plan) and implementation of appropriate BMPs. The training class must address all local requirements for a SWP2 plan, and requirements for permits.	The city currently holds an annual meeting for contractors to discuss Erosion Control requirements. This series of meetings will be expanded to fulfill the training requirements of this BMP, beginning no later than 2023. (Planning 3 points in 2023 and 2 points in 2024).
4.D	CSSRC - 04: Site Plan Review Process	Develop a site plan review process which considers potential water quality impacts which may occur during construction as well as post construction impacts. Review process must have written guidelines for the reviewer. Issuance of a building permit or approval to start construction may not be provided until the site plan has successfully passed the review process, either based on the initial site plan submittal or has been modified to comply with requirements identified during the review process. Measures must be included to enforce the installation of water quality BMPs included in the site plan.	The site plan review process already exists within the City. It involves a combination of Public Works and Risk Reduction (Codes) review steps and administration. A working group will update and confirm the written documentation of procedures in 2021 and make any modifications necessary. (Planning on 3 points in 2021 and 2 points in each of the following years).
4.E	CSSRC - 05: Construction Wastes	Establish effective requirements for construction sites to control wastes. Develop through ordinance or other enforceable means requirements for construction site operators or owners to control wastes. At a minimum, control shall be imposed to prevent entry into the MS4 for the following wastes: discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste. Enact ordinance or other effective means to achieve control of wastes at construction sites.	These requirements already existing within the City. This topic will be highlighted at the 2021 annual meeting with contractors regarding erosion control, and efforts to educate contractors will continue. (Planning on 3 points in 2021 and 2 points in each of the following years).

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4.F	CSSRC - 06: Inspection Guide	Develop written procedures for inspection of construction sites. Develop a Stormwater Construction Site Inspection guide for use by municipal inspectors. The procedures document must address the administrative aspects associated with required inspection of construction sites, the issuance of inspection reports, notices of violations, and enforcement actions. The Inspection Guide must provide inspectors guidance on how to conduct a construction site stormwater inspection, the required procedures, and guidance on acceptable conditions of various BMPs employed on such sites, enforcement actions and/or reference of cases for enforcement by other municipal staff, guidance on photo log log of the inspection and inspection checklists for use by the inspector.	Procedures for most of these requirements are already in place. Formal documentation of those procedures and the Inspection Guide will occur in 2021 and 2022. (Planning on 3 points in 2022 and 2 points in each of the following years).

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<i>Post-Construction Stormwater Management in New Development and Redevelopment Projects</i>			
5.A	PCSM - 01: Post-Construction BMP Design Manual	Develop and adopt a custom design manual for Post-Construction Stormwater Management which specifies various structural BMPs which are required for new development and re-development constructoin sites which are greater than 1 acre or for which there is a construction activity disturbing less than one acre which is part of a larger common plan of developepment or sale that in total disturbs more than one acre. The custom design manual shall impose requirements to achieve a suitable treatment, sizing or detention outcome (see permit for more detailed requiremens). Measures must be included to enforce the installation of the vairou	The City already has a Stormwater Management Manual and requires implementation of all BMPs that are included in a final construction plan design. These standards or further amendments to them will be maintained throughout the permit term. Significant updates to the City's base design standard are under development and are expected to be adopted in 2021 or 2022. (Planning on 4 points in 2021 and 3 points in each following years).
5.B	PCSM - 03: Operations and Maintenance	Develop and implement a program to ensure adequate long-term cleaning, operation and maintenance of all municipally owned or operated post-construction structural stormwater BMP facilities. The program shall address several different types of these BMP systems, if present in the City, including: detention ponds, retention ponds, grass swales, pervious paving systems, wetlands, vegetative filter strips, manufactured stormwater treatment devices, or drop inlet-catch basins. The program shall be detailed in a written document and made available to all pertinent maintenance staff.	Maintenance of city-systems is currently performed in both proactive and reactive modes. The inventory and program for maintaining existing stormwater facilities of this type will be formalized in 2021 and continued through the permit terms. (Planning on 3 points in 2021 and 2 points in each of the following years)

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5.C	PCSM-04: Master Plan	Develop a master plan or comprehensive development plan which establishes zoning and development standards with establishment of both structural and non-structural BMPs intended to avoid or minimize adverse water quality impacts post-construction. To handle runoff problems efficiently through sound planning, the planning document must include, if not already implemented, a zoning ordinance, a stream buffer ordinance, site plan development requirements which include minimizing the increase of impervious surfaces and the maximization/preservation of open space. The plan must also impose requirements for new development or re-development projects to utilize stormwater retention or detentions BMPs and vegetative BMPs (such as grassy swales, filter strips, artificial wetlands, and rain gardens).	Key elements of master planning and site development requirements already exist, and several further advancements are in progress. A major revision to both our Uniform Development Ordinance (UDO) and our Stormwater Drainage Manual are in development. Goals related to open space, conservation, and stream buffers are possible. A final deliverable and timetable is not available at this time. (Up to 5 points would be available in first year once all requirements are met, with 2 points each year after. For planning purposes, no points are projected.)
5.D	PCSM-05: Inspect Public BMPs	Develop and implement a program for inspection of City owned structural BMPs which includes implementation of needed maintenance to ensure long-term operation of the BMPs. At least 10% of all structural BMPs will be inspected annually, with maintenance activities completed or planned (see permit for more details).	Formal program development is planned for adoption in 2023 and continuation after. (Planning on 3 points in 2023 and 2 points in 2024).

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5.E	PCSM-06: Inspect Private BMPs	Develop and implement a program for inspection of known privately owned structural BMPs which includes providing the owner of the BMPs an inspectoin report which specifies needed maintenance to ensure long-term operation of the BMPs. Requier inspection of at least 10% of the private known structural BMPs, with identified maintenance activities completed or planned (see permit for more details).	Formal program development is planned for adoption in 2024 and continuation after. (Planning on 3 points in 2024).
<i>Pollution Prevention/Good housekeeping for Municipal Operations</i>			
6.A	PP/GH-03: Pesticide Applications	Develop a guidance document for municipal staff or third-party contractor which apply pesticides. Guidance shall require any municipal staff who apply restricted pesticides to have a commercial applicator certification from the Kansas Dept of Agriculture. Enforce requirement.	The City already exceeds these requirements for applicators. Program will be further reviewed and formal documents prepared in 2022. (Planning on 2 points in 2022 and 1 point in each following year)
6.B	PP/GH - 05: Street Sweeping	Implement a program for street sweeping in which sweepings are collected and disposed or recycled properly. All streets that can be swept shall be listed in a schedule, and a log kept. At least 10% of the streets must be swept at least once in a year.	City's current street sweeping program meets this requirements and will be continued. (Planning on 3 points in 2021 and 2 points in each year following. Additional points for purchase of street sweeping equipment will be claimed when applicable.)
6.C	PP/GH - 06: Employee Training	Develop an employee training program to city's staff understand what actions they can takein the workplace to minimize stormwater pollution. Provide guidance in form of fact sheets, flyers or emails to staff, or provide in-person training or videos. Records and logs required. Training and/or guidance provided at least twice per year.	Training porgams and materials will be developed for implementation in 2023. Plan to have a mixed approach, with in-person trainings for selected work groups with higher involvement in stormwater issues, supplemented by general awareness info distributed electronically emails and the City's "Little Apple Core" intranet. (Planning on 1 point in 2023 and 2024)

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6.D	PP/GH-07: Inlet Inspections & Cleaning	Implement a program to inspect stormwaer inlets to identify illicit discharges and remove debris. If inlets have evidence of dumped paint, oil or other substances, follow-up with efforts to investigate or educate.	City already meets this threshold for inlet inspection and cleaning. (Planning 1 point for each year 2021-2024. In some years, the extra point for achieving 10% levels may be claimed).
6.E	PP/GH-08: Online Storm Sewer Map	Develop, implement and keep updated an online storm sewer map accessible to the public. Map shal cover entire MS4 permit area and include pipes and open drainage (ditches) and illustrate all impaired waterways with information.	City current provides most of this information to the public through the Riley County GIS Online maps, and it will be maintained.. Remaining required information to be provided in 2021. (Planning on 3 points in 2021 and 2 points for each following year)
Total Maximum Daily Load (TMDL) Best Management Practices			
7.A	TMDL - 01: Pet Waste Stations	Install pet waste stations which include a glove/bag dispenser, with signage and waste can, to encourage pet west disposal at parks, trials, rest areas or other City-owned public land. At least 1 station installed.	City plans to install or maintain the installation of new fewer than 5 such stations, primarily in City parks no later than 2021. Several are already in place. (Planning on 1 point for each year 2021-2024)
7.B	TMDL - 05: Pet Waste Education	Develop a pet waste brochure or flyer to educate the public about animal waste contamination and encouragement to pick up their pets waste. Distribute brochures in various locations in numbers equal or exceeding the US Census Bureau housing units value. Alternatively, post the document on social media (6 times per year) or websites (6 month duration)	City will undertaken social media options, with supplemental hard copy distribution. (Planning on 1 point in each year 2021-2024)

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7.C	TMDL-06: "Only Rain Down the Drain" Education	Distribute "Only Rain Down the Drain" door hangers or similar documents. Provide in a portion of the permit area with suspected illicit discharges. Distribution shall equal or exceed 10% of the census counted housing units. Alternatively, post the document on social media (3 times per year) or websites (3 month duration)	City will undertake social media options, with supplemental hard copy distribution. (Planning on 2 points in each year 2021-2024)
7.D	TMDL-07: More Dry Weather Outfall Inspections	Inspect 10% of all known outfalls for dry weather discharges (an increase over the 5% in BMP 3.C). Complete either annually or twice per year (points vary). If dry weather discharge is found, follow-up with investigation. Document outcomes.	City will undertake the increased inspections to reach 10% more per year, expanding on BMP 3.C, beginning in 2023, to bring total inspections per year to a minimum of 15% of known outfalls (approximately 128 of 850). (Planning on 3 points each in 2023 and 2024)