STORMWATER MANAGEMENT PLAN MEXICO, MO

May 13, 2008

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FOR MEXICO, MO

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PART I
CITY OF MEXICO
BACKGROUND

City of Mexico Background

Information on the Permittee:

Name of the Permittee: City of Mexico, Missouri
Type of Entity: City – Municipality
Total Area (acres): 11.7 sq. miles
Mailing Address: 300 N. Coal, Mexico, MO 65265
Primary Contact: Chad McCullough, P.E. – City Engineer
Phone Number: 573-581-2100
Secondary Contact: Jim Sternberg – Engineering Technician
Phone Number: 573-581-2100
Population (2000): 11,320

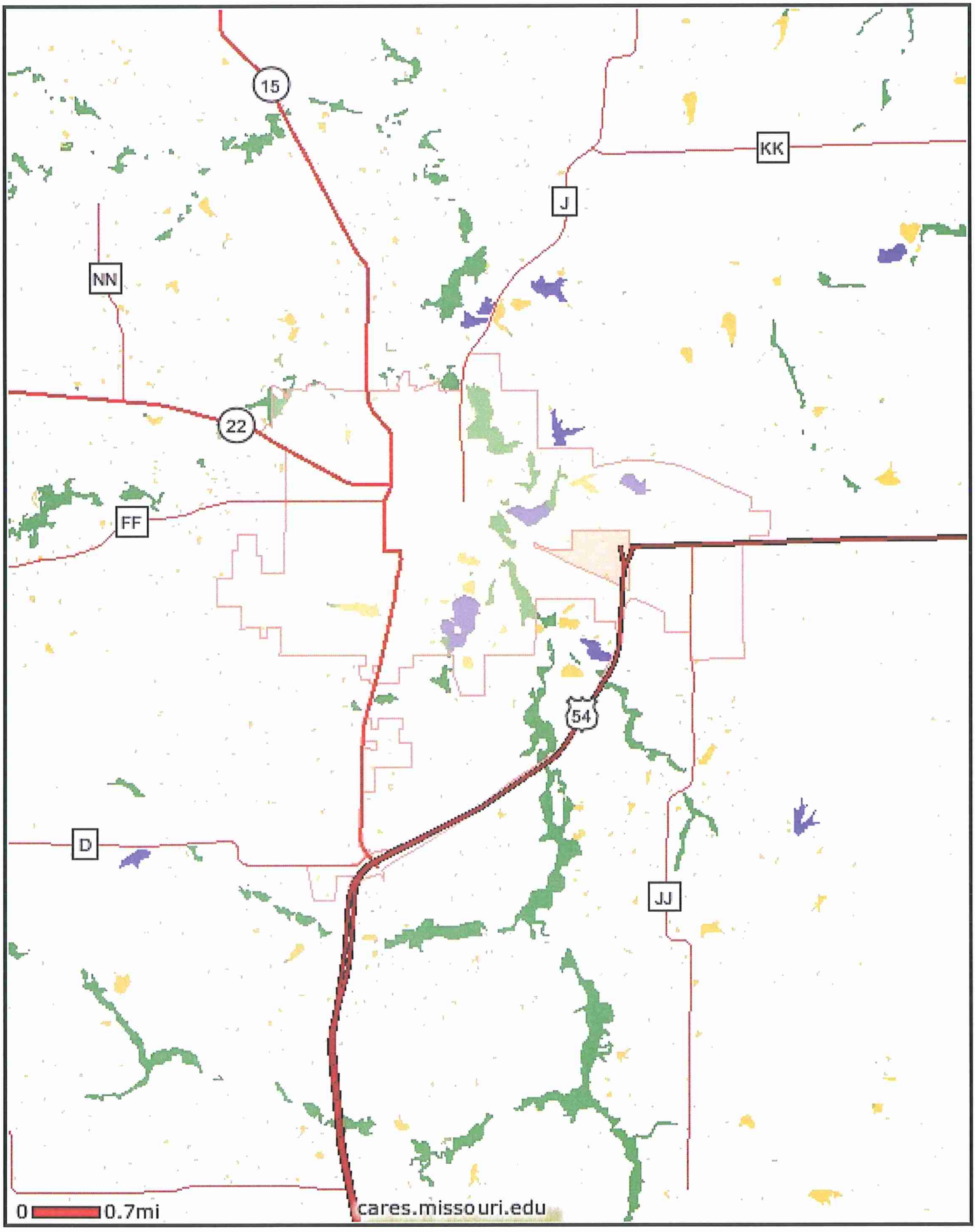
Information on the Municipal Separate Storm Sewer System:

MS4 System Location: Mexico, Missouri
Name of Organization: City of Mexico, Missouri
County Permitee Resides: Audrain County
The major receiving waters within/near the permitted area include: Davis Creek, South Fork Salt River, Long Branch, Lakeview (Park) Lake, Teal Lake, Kiwanis Lake, Railroad Lake (AKA C&A Lake), Bean Branch, Scattering Fork
None of the receiving waters are on the latest CWA's list of impaired waters.

Information on Adjacent Waterways:

The Permittee is within 100 feet of: Davis Creek, South Fork Salt River, Long Branch
The Permittee discharges to waters classified as major reservoirs: Lakeview (Park) Lake, Teal Lake, Kiwanis Lake and Railroad Lake (AKA C&A Lake).
The Permittee has some area defined as wetlands as identified by the National Wetland Inventory. See attached map.
Stormwater from Mexico does not discharge to a sinkhole.

City of Mexico - Nat'l Wetland Inventory Map



Legend

2006 Sinkhole Features

- USGS
- MoDNR Division of Geology and Land Survey

MoDOT Roads and Highways, 2007

- Interstate
- U.S. Highway
- State Numbered Highway
- State Lettered Highway
- Principal Road

Incorporated Areas

- City
- Town
- Village
- Census Designated Place
- Other

National Wetlands Inventory

- Inland Aquatic Bed
- Inland Forested Wetland
- Inland Herbaceous Wetland
- Inland Shrub Swamp
- Lower Perennial River
- Upper Perennial River
- Intermittent River
- Lake (Shallow)
- Lake (Deep)
- Pond
- Pond (Drawdown)
- Other Vegetated Wetland

Locator Map

Map prepared by:
http://cares.missouri.edu,
4/24/2008

PART II
MINIMUM
CONTROL
MEASURES

1. Public Education and Outreach

1.1 Regulatory Requirement

40 CFR 122.34 (b)(1) – Implement a public education program to distribute educational materials to the community of contact, equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps the public can take to reduce pollutants in storm water runoff.

1.2 Target pollutants

The following is a prioritized list of the leading pollutants, experienced in the permitted area, that are carried by stormwater runoff into water bodies:

1. Suspended solids
2. Oil and grease
3. Pesticides/Herbicides
4. Bacteria/Nutrients/Oxygen-depleting substances
5. Habitat alterations
6. Salinity (salt)

1.3 Target audiences

During the development of the proposed education program, Mexico identified the sources of stormwater pollutants that needed to be reduced to improve overall water quality. The target audiences were selected because changing their behavior would have a significant stormwater quality impact on the target pollutants. The target audiences for the public education program are:

1. Citizens (Homeowners)
2. Developers and Home Builders
3. Business Owners
4. Children
5. Elected Officials
6. City Staff

1.4 Current Programs

The City of Mexico provides general public education to residents on a variety of subjects through the City web site, occasional articles in the newspaper, handouts at City Hall, postings on the local cable channel, City newsletter and utility bill announcements. No specific information has

been provided to the public regarding municipal storm sewer discharge quality prior to the beginning of this program.

1.5 Selected BMPs for Public Education and Outreach

1.5.1 Stormwater Web Page

The City of Mexico will develop a stormwater web page as part of this Storm Water Management Program.

The measurable goals for implementation of this BMP are to develop a web page that includes general stormwater information, conveys actions citizens can take to improve stormwater quality, solicits input on the program plan and implementation, and requests reporting of various problems (ie. dumping, construction site problems, etc). The website will be completed by March 2009 and will be updated quarterly.

1.5.2 Public presentations

The City of Mexico will make public presentations on stormwater quality protection as part of this Storm Water Management Program. This will allow the message to be tailored to specific audiences. It will be integrated into the program through coordination with various schools, civic organizations, service clubs and other opportunities as they arise.

The measurable goal for implementation of public presentations is to provide a presentation to a community group or school at least twice a year beginning within six months of issuance of the permit.

1.5.3 Demonstration projects

The City of Mexico will host demonstration projects as part of this Storm Water Management Program. This will allow various methods of protecting water quality to be viewed and experienced. It may be integrated into various target audience training programs.

The measurable goal for implementation of demonstration projects is to complete at least two each permit cycle with the first taking place within 2 years of the issuance of the permit.

1.5.4 Brochures

The City of Mexico will develop and distribute brochures as part of this Storm Water Management Program. This will allow the City to distribute to the widest audience possible.

The measurable goal for implementation is to have a general brochure based on EPA literature developed by September 10, 2008. Brochures will be distributed at City Hall and the library. They will be replenished quarterly.

1.5.5 Utility Bill Insert/City Newsletter Article

The City of Mexico will distribute stormwater quality information through its utility bills or City newsletter as part of this Storm Water Management Program. This will allow the City to distribute to the widest audience possible.

The measurable goal for implementation is to include stormwater quality information in the utility bills (either via a separate flyer or the City newsletter) by September 10, 2008 and quarterly thereafter.

1.5.6 Press Releases

The City of Mexico will issue press releases related to stormwater quality as part of this Storm Water Management Program. This will allow the City to distribute to the widest audience possible.

The measurable goal for implementation is to issue a press release to local print and radio media by September 10, 2008 and quarterly thereafter.

1.5.7 Local Cable Channel

The City of Mexico will post information related to stormwater quality to its local access cable channel as part of this Storm Water Management Program. This will allow the City to distribute to the widest audience possible.

The measurable goal for implementation is to post information to the local access cable channel by September 10, 2008 and quarterly thereafter.

1.5.8 Distribute Educational Materials at Community Event

The City of Mexico will distribute educational materials at a community event as part of this Storm Water Management Program. This will allow the City to distribute to the widest audience possible.

The measurable goal for implementation is to identify at least one community event to do this and develop the materials to be distributed at this event by December 31, 2008. This goal will be achieved at least once/year thereafter. Discussion of tying into the

"Walk Back In Time" event hosted by the Historical Society would allow for a "history" of stormwater events to provide a discussion about the historical changes to the area watersheds and the effects of those changes on stormwater quality and flooding problems.

1.5.9 Incorporate Stormwater Quality Information into Quarterly Utility Meetings

The City of Mexico will incorporate stormwater quality information into its existing quarterly utility meetings as part of this Storm Water Management Program. This will allow the City to target a specific stakeholder audience.

The measurable goal for implementation is to begin this modification to the meetings by September 10, 2008 and continue it thereafter.

1.5.10 Door Hangers

The City of Mexico will distribute informational door hangers as part of this Storm Water Management Program. This will allow the City to distribute to the widest audience possible. Most likely, this will be done in conjunction with various storm drain marking events to tie into the public involvement program and the illicit discharge detection and elimination program.

The measurable goal for implementation is to distribute at least 150 door hangers at least once a year beginning within twelve months of the date of permit issuance.

1.5.11 Questionnaire

The City of Mexico will develop and send a questionnaire with an informational cover letter as part of this Storm Water Management Program. This will allow the City to distribute to the widest audience possible.

The measurable goal for implementation is to develop the questionnaire and informational cover letter by December 31, 2008 and send it out at least twice per permit cycle. Data from the questionnaires will be tabulated and published within six months of issuance. It is hoped that this will assist with establishing a benchmark of public knowledge regarding stormwater and provide a measure of increase in knowledge while also providing an avenue to explain desired actions of the citizenry.

2. Public Involvement in Storm Water Management Program Development

2.1 Regulatory Requirement

> **40 CFR 122.34 (b)(2) -At a minimum, comply with state, tribal, and local public notice requirements when implementing a public involvement/participation program. *EPA recommends that the public be included in developing, implementing, and reviewing your storm water management program and that the public participation process should make efforts to reach out and engage all economic and ethnic groups.***

2.2 Current Programs

Currently, the City of Mexico invites public participation and input on general topics through the city web site, regular planning and zoning hearings and regular city council meetings. All standard state and local public notice requirements are followed for the meetings. No specific information has been provided to the public regarding participation in improving municipal storm sewer discharge quality prior to the beginning of this program.

2.3 Selected BMPs for Public Involvement

The City of Mexico will comply with state and local public notice requirements when implementing the public involvement/participation program.
The public will be included in reviewing and implementing the storm water management program as much as possible. Specific BMPs for this measure include:

2.3.1 Existing Public Meetings

The City of Mexico will invite public input through existing meetings as part of this Storm Water Management Program. This BMP allows public involvement and participation to be integrated into existing meetings through the addition of regular agenda items to the City Council meetings and discussion of development and redevelopment issues as they relate to stormwater at the Planning and Zoning hearings. The City Council typically has meetings twice a month and the Planning and Zoning hearings are typically held monthly.

2.3.2 Public Input on SWMP

The City of Mexico will request public input on this SWMP as part of this Storm Water Management Program. This BMP allows for direct public involvement and participation in the development and implementation of the SWMP. This BMP will include posting the SWMP on the City web site and inviting comment, issuing a press release to notify the public

where they might view either a hard copy or electronic copy of the SWMP and receiving the comments. Staff will compile these comments.

The measurable goal for implementation of this BMP is to complete this task by September 10, 2008 and compile comments by March 10, 2009.

2.3.3 Phone/contact log

The City of Mexico will utilize a phone/contact log as part of this Storm Water Management Program. This BMP allows for direct public involvement and participation. This BMP will include developing necessary internal policies and procedures for receipt of information from the public. It will also include development of a uniform tracking log so that each call, email, letter or in-person comment is received in a manner that best allows staff to respond to concerns. Follow up actions will also be documented.

The measurable goal for implementation of this BMP is to complete this task by March 10, 2009 with documentation of public input ongoing thereafter.

2.3.4 Community Group Activities

The City of Mexico will utilize community group outreach as part of this Storm Water Management Program. This BMP will be coordinated with educational efforts discussed under MCM #1. This BMP will include obtaining or developing a community group contact list, reaching out to these groups about activities they can be involved in related to the stormwater program, hosting a stream clean up event and hosting a storm drain marking event.

The measurable goals for implementation of this BMP is to obtain or develop the community group contact list by September 10, 2008 and establishing contact with these groups by March 10, 2009 and annually thereafter. Additionally, at least one stream cleanup event and one storm drain marking event will be hosted annually beginning by December 31, 2009.

2.3.5 Involvement Information Integrated with Public Education Efforts

The City of Mexico will integrate information about how the public can be involved in the stormwater program with other public education efforts as part of this Storm Water Management Program. This BMP will require that educational materials such as brochures, websites, press releases, etc include information about how citizens can be involved in the stormwater management program.

Please refer to goals and timelines under MCM #1 for implementation.

2.3.6 Questionnaire

See Section 1.5.11.

3. Illicit Discharge Detection and Elimination

3.1 Regulatory Requirement

> **40 CFR 122.34 (b)(3) -Develop, implement, and enforce a program to detect and eliminate illicit discharges into your small MS4. Develop a storm sewer system map, showing the location of all outfalls and the names and locations of all water of the U.S. that receive discharges from those outfalls. To the extent allowable under state, tribal or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions. Develop and implement a plan to detect and address non-storm water discharges including illegal dumping to your system. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Address categories listed in 122.34(b)(3)(D)(iii) if you determine they are significant contributors of pollutants to MS4.**

3.2 Current Programs

Currently, the City of Mexico performs CCTV inspection of its sanitary sewer system that can assist in identifying areas of cross-connection to the storm sewer system. The City also has a storm sewer system inventory begun in an AutoCAD environment tying it back to some paper maps. No specific IDDE program is in place at this time.

3.3 Selected BMPs for Illicit Discharge Detection and Elimination

3.3.1 Storm Sewer Map

The City of Mexico will develop a storm sewer system map, showing the location of all outfalls and the names and locations of all water of the U.S. that receive discharges from those outfalls. The first draft of this map will be completed on paper and in an AutoCAD environment with the ultimate goal to be having a GIS-based map that will integrate any additional GIS data such as aerial photography, contour data, zoning, etc that is available.

The measurable goal is to complete the paper/AutoCAD map by March 10, 2009 and the GIS map by March 10, 2013. This map will show all outfalls and wet weather drainage system including open conveyances.

3.3.2 Illicit Discharge Ordinance

The City of Mexico will develop an ordinance to effectively prohibit non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions.

The measurable goal for implementation of this BMP is to develop a draft ordinance and submit to the Council by December 31, 2009. In conjunction with the adoption of the ordinance, internal policies and procedures for receipt of complaints, inspection, investigation and enforcement will be developed. The ongoing goal will be to document any investigations or enforcement actions that take place pursuant to this ordinance and report on them annually.

3.3.3 Designated Phone Number/Email

The City of Mexico will identify and publish a phone number and email for reporting of prohibited non-storm water discharges into the storm sewer system.

The measurable goal for implementation of this BMP is to complete this task by December 31, 2008. This will be coordinated with public involvement BMPs listed under MCM #2.

3.3.4 Utilization of Maintenance Staff for Detection

The City of Mexico will educate City staff on detection of illicit discharges/connections and include at least minimal inspection in the course of carrying out existing storm sewer system maintenance activities.

The measurable goal for implementation of this BMP is to complete the initial education of staff by December 31, 2008. Modifications to existing policies and procedures will be documented and implemented by March 10, 2009. This will be coordinated with good housekeeping BMPs listed under MCM #6.

3.3.5 Major Outfall Screening

The City of Mexico will develop a formal inspection plan with related policies and procedures for visual field screening of outfalls. Upon completion of the plan, policies and procedures, necessary training and supplies will be obtained.

The measurable goal will be to complete the initial plan, policies and procedures by June 1, 2009 and screen 50% of major outfalls each year beginning in 2009.

3.3.6 Public Education on Illegal Discharges and Improper Disposal

The City of Mexico will develop a public education effort to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. This will include distribution of informational door hangers during storm drain marking events (in addition to the marking itself). This BMP also addresses the minimum control measure for public education. See Section 1.4 for additional details.

3.3.7 Investigate cross-connection of sanitary and storm sewer systems

The City of Mexico will continue to investigate cross-connection of the sanitary sewer system through CCTV inspection.

The City of Mexico will develop a prioritization for investigation for cross-connections in conjunction with the wastewater program utilizing all the resources available for inspection.

3.3.8 Continue Household Hazardous Waste (HHW) Collection Program

The City of Mexico will continue to encourage its citizens to participate in the HHW collection program. The public education program will further advertise these options for proper disposal of HHW.

4. Construction Site Storm Water Controls

4.1 Regulatory Requirement

> **40 CFR 122.34 (b)(4) -Develop, implement and enforce a program to reduce pollutants in any storm water runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Program must include: the development and implementation of (at a minimum) and ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, requirements for construction site operators to implement appropriated erosion and sediment control BMPs, requirements for construction site operators to control waste at the construction site, procedures for site plan review which incorporate consideration of potential water quality impacts, procedures for receipt and consideration of information submitted by the public.**

4.2 Current Programs

Currently, the City of Mexico reviews improvement plans for infrastructure related to new development. As there are currently no specific stormwater or construction site runoff control standards, only informal comments regarding these matters are made. Inspections take place to ensure that infrastructure meets current City requirements and could be expanded to include stormwater issues.

4.3 Selected BMPs for Construction Site Storm Water Controls

4.3.1 Construction Site Runoff Control Ordinance

The City of Mexico will draft and submit to the Council for adoption an ordinance to address construction site runoff control that will be relatively as stringent as the state land disturbance permit requirements. In conjunction with the ordinance development, staff will develop internal policies, procedures and necessary checklists to assist with implementation of this ordinance.

The measurable goal for implementation of this BMP is to complete this task by December 31, 2009. The ongoing goal will be to enforce the new ordinance and document inspections and enforcement actions to be reported annually.

4.3.2 Erosion and Sediment Control BMP Design Criteria/Standards

The City of Mexico will develop and formally adopt erosion and sediment control design criteria and standards. The City will look to APWA, MDNR and EPA for various resources on this topic.

The measurable goal for implementation of this BMP is to complete this task by December 31, 2009.

4.3.3 Public Education on Construction Site Storm Water Control Requirements

The City of Mexico will strive to inform construction site operators, developers and employees of the requirements for construction site storm water controls. The City will also have a component of their general public education program to inform the citizens about construction site runoff control. (This BMP also addresses the minimum control measure for public education.)

The City of Mexico will acquire and/or develop public education materials and distribute them according to goals set forth in Section 1.4. The City will annually host a training event specific to construction site runoff control beginning by 12/31/10.

4.3.4 Receive public input on proposed and current construction projects

The City of Mexico will receive public input regarding construction projects as part of this Storm Water Management Program. This BMP coordinates with MCM #2 and can be integrated into existing activities through receipt of information from the public at the existing Planning and Zoning hearings and City Council meetings. Additional input can be received less formally through the City web site and at the designated phone number and mailing address.

The measurable goal for implementation of receiving public input on proposed and current construction projects is to log the receipt of this information, respond within 1 business day where applicable and to document any inspection or enforcement actions taken.

4.3.5 Require SWPPP for all Capital Improvement Projects (CIPs) Disturbing More than 1 Acre

The City of Mexico will require SWPPPs for Capital Improvement Projects as part of this Storm Water Management Program. This BMP coordinates with MCM #6 and can be integrated into existing activities. Additionally, the City may consider developing a somewhat generic SWPPP for all maintenance and capital projects that fall under the traditional threshold of one acre of disturbance.

The measurable goal for implementation of this BMP is to verify all CIPs that fall over the 1 acre disturbance threshold have a SWPPP and verify through inspections that they are being followed. Implementation will begin immediately.

4.3.6 Plan Review

The City of Mexico will perform plan reviews as part of this Storm Water Management Program. Plan review policies and procedures adding emphasis on protection of water quality will be developed. All development and re-development projects disturbing greater than one acre (or otherwise requiring City review) will be evaluated for its potential impact to water quality and comments provided to minimize the potential for discharge of pollutants from the site.

The measurable goals for implementation of this BMP is to complete the review for all construction projects that fall over the 1 acre disturbance threshold (or otherwise require City review) and provide comments related to protection of water quality. Implementation will begin immediately.

5. Post Construction Storm Water Management for New Development/ Redevelopment

5.1 Regulatory Requirement

> **40 CFR 122.34 (b)(5) –Develop, implement and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects that are less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community. Use an ordinance or other regulatory mechanism to address post-construction runoff. Ensure adequate long-term operation and maintenance of BMPs.**

5.2 Current Programs

Currently, the City of Mexico has planning and zoning ordinances in place that work to control development and provide for some set asides for open space. However, these ordinances have a minimal impact on water quality and natural resource protection at this time.

5.3 Selected BMPs for Post Construction Storm Water Management for New Development/Redevelopment

5.3.1 Stream Buffer Ordinance

The City of Mexico will draft and submit to the Council for adoption a stream buffer ordinance to require use of these deep-rooted vegetative areas in new development and redevelopment to ensure filtration of runoff and assist in stream bank stability.

The measurable goal for implementation of this BMP is to complete this task by December 31, 2009.

5.3.2 Stormwater BMP Operation and Maintenance Ordinance

The City of Mexico will draft and submit to the Council for adoption an operation and maintenance ordinance to require long term upkeep of any stormwater BMPs installed to ensure their ongoing effectiveness.

The measurable goal for implementation of this BMP is to complete this task by December 31, 2009.

5.3.3 Adopt Stormwater Management Design Standards

The City of Mexico will review APWA's existing design criteria for stormwater management facilities and draft any additions/exceptions to customize these standards to the needs and community goals of Mexico.

The measurable goal for implementation of this BMP is to adopt the standards by December 31, 2009.

5.3.4 General Stormwater Management Ordinance

The City of Mexico will draft and submit to the Council for adoption a general stormwater management ordinance. Although this may primarily address quantity control, it will also impact quality by addressing small storm events that produce water quality volumes or channel protection volumes. It may also address the needs for easements and/or land set asides for better overall stormwater management.

The measurable goal for implementation of this BMP is to complete this task by December 31, 2009.

5.3.5 Review Town Branch Master Plan

The City of Mexico will review the Town Branch Master Plan for any previously developed guidance that could impact water quality.

The measurable goal for implementation of this BMP is to complete this task by December 31, 2008.

5.3.6 Review Existing Codes/Standards

The City of Mexico will review existing codes/standards to evaluate where improvements could be made to minimize impervious areas, improve infiltration, expand open space, and overall provide flexibility to the design community in creating developments that are more sensitive to natural resources. This will include, but may not be limited to, the review of subdivision, zoning, parking, and open space regulations along with design standards for streets, parking areas, etc.

The measurable goal for implementation of this BMP is to complete the review by December 31, 2010. Modifications will be drafted and sent to Council for adoption by December 31, 2011.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

6.1 Regulatory Requirement

> **40 CFR 122.34 (b)(6) Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.**

6.2 Current Programs

Currently, the City of Mexico performs nearly all fleet maintenance including fueling, washing and minor service/repair under cover; recycles their waste oil from service activities; has containment in place for fuel storage in case of a leak or spill; stores road deicing salt under cover; cleans six City parking lots; performs street sweeping of all streets at least four times a year with close to weekly for streets in the business district; requires stormwater pollution prevention measures in all construction projects disturbing greater than an acre; discharges swimming pool water to the sanitary sewer; performs catch basin cleaning and storm sewer flushing; and inspects sanitary sewers with CCTV.

6.3 Selected BMPs for Municipal Operations

6.3.1 Employee training

The City of Mexico will maximize its pollution prevention related to its current activities especially in regards to fleet maintenance, facilities and parks maintenance, construction activities, road maintenance, etc. Staff training may be accomplished through distribution of newsletters, informational brochures, workshops and demonstrations, etc. See Section 1.4 for further details.

The measurable goal for implementation of this BMP is to develop a list of training topics by September 10, 2008 and complete training on at least four of those topics each permit year beginning in 2009. An employee training workshop will be hosted annually beginning in 2009.

6.3.2 Review Solid Waste Contract

The City of Mexico will review the solid waste contract as part of this Storm Water Management Program. Staff will review the existing contract and make recommendations for changes to any contract renewals for inclusion of pollution prevention policies.

The measurable goal for implementation of this BMP is to review the existing contract in 2009 and make recommendations for modifications to any renewal contract starting in 2010.

6.3.3 Review Spill Prevention/Response Policies and Procedures

The City of Mexico will review its spill prevention and response policies and procedures as part of this Storm Water Management Program. Staff will document any existing policies and procedures and make recommendations for modifications as necessary.

The measurable goal for implementation of this BMP is to review and document existing policies and procedures and make recommendations for modifications by December 31, 2009.

6.3.4 Audit Maintenance Yards

The City of Mexico will audit City maintenance yards as part of this Storm Water Management Program. Staff will inspect the maintenance yards for Streets and Parks for stormwater pollution potential. This may also include review of fueling areas. Recommendations will be developed and modifications needed to achieve Good Housekeeping will be implemented as feasible.

The measurable goal for implementation of this BMP is to complete the audit and make recommendations for modifications by December 31, 2010. Implementation of all feasible modifications will be completed immediately.

6.3.5 Promote Pet Waste Collection in City Parks

The City of Mexico will promote pet waste collection in City parks as part of this Storm Water Management Program. The City of Mexico has extensive lands set aside as park land. The historical background of the area makes this a wildlife "sink". It will likely be impossible to remove all fecal bacteria from park waterways due to a heavy wildlife population. However, pet waste collection is desired to at least minimize this additional pollutant load.

The measurable goal for implementation of this BMP is implement pet waste collection on park lands in 2009.

6.3.6 Construction Site BMPs

See Section 4.3.5.

6.3.7 Ongoing programs

The City of Mexico will continue and expand where pertinent ongoing municipal programs that impact water quality as part of their implementation of this Storm Water Management Program.

The measurable goals for implementation of this BMP are to continue regular street sweeping, municipal parking lot cleaning, used oil recycling, fleet maintenance and salt storage under cover, catch basin cleaning, storm sewer flushing, inspection for cross-connection with sanitary sewer system, and construction site controls on City projects.

By their nature these activities are ongoing and follow established schedules. However, documentation of any possible metrics shall be completed regularly and reported on annually. Additionally, the City may consider auditing existing activities for needs to improve methodologies or document existing policies and procedures related to these ongoing activities.

7. General Rationale

7.1 Decision Process

The City of Mexico reviewed the General Permit requirements and selected each of the BMPs after reviewing research from notable sources such as the EPA and the Center for Watershed Protection. Programs from other communities were also examined. Various BMPs were selected based on the evidence that they will have a positive impact on targeted pollutants. City staff also examined each BMP for how it could fit into existing activities and mechanisms. The SWMP will be made available for public inspection and comment upon completion.

7.2 Responsible Person

The person responsible for the overall management and implementation of the permittee's stormwater management program is the City Engineer. Others will be involved in the execution of each of the individual activities in the program.

7.3 Evaluation

The City of Mexico will report annually on the level of achievement toward all measurable goals. Where applicable, metrics will be documented. Qualitative anecdotal evidence will also be documented where possible. The proposed water quality attitude survey may also serve as a measurement in the change of the public's attitudes and behaviors.