Wentzville
Stormwater Management Program

2024 Annual Report

Municipal Separate Storm Sewer System

(MS4) Permit #MOR04C075

Reporting Period: January 1 to December 31, 2024

Submitted February 24, 2025

This report supplements the City of Wentzville's Section A. MS4 SWMP Report Form MO-780-3009.

Note: Public comments regarding the City's Stormwater Management Program, five-year plan or this report can be submitted online at www.wentzvillemo.gov/stormwater.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) ANNUAL STORMWATER MANAGEMENT PROGRAM REPORT FOR COMPREHENSIVE PERMIT (MOR04C)

Part A – MS4 PERMIT HOLDER INFORMATION

1. MS4 NAME City of Wentzville	2. NPDES PERMIT NUMBER MOR04C075	3. MS4 UNIQUE ID NO. (If applicable – co-permittees only) N/A

4. ADDRESS 1001 Schroeder Creek Blvd.	5. CITY Wentzville	6. STATE MO	7. ZIP CODE 63385

8. TELEPHONE NUMBER WITH AREA CODE (636) 327-5102	9. NAME OF MS4 CONTACT PERSON Jamie Paige

10. EMAIL OF MS4 CONTACT PERSON
Jamie.Paige@wentzvillemo.gov

11. Is the MS4 contact person listed above different from the most recent MS4 stormwater management program annual report?
☐ Yes   ☑ No

12. Have any areas of the MS4 been added or removed from the MS4 jurisdiction due to annexation or other legal means since the most recent permit application (renewal, new, modification), or most recent MS4 stormwater management program annual report?
☑ Yes   ☐ No
If **Yes**, please provide a map along with a brief description as an attachment.

Part B – REPORTING REQUIREMENTS

1. Is your MS4 subject to a TMDL?   ☐ Yes   ☑ No
If **Yes**, you are required to submit the MS4 ARAP report annually. Reports are due **Feb. 28** each year. See Part F of this form.

2. Is your MS4 newly permitted (i.e., is this your first MS4 permit)?   ☐ Yes   ☑ No

3. If you are part of a co-permitted MS4 permit, will each co-permitted MS4 submit and individual stormwater management program report, or a combined MS4 stormwater management program report?   ☐ Individual   ☐ Combined   **N/A**

4. Reporting period year (i.e., the previous year from January 1st to December 31st)

BEGINNING: _____January 1, 2024_____   ENDING: _____December 31, 2024_____

Part C – STORMWATER MANAGEMENT PROGRAM PARTNERS

1. If another governmental entity implements any BMPs or MCMs for your stormwater program, please provide the following: **N/A**
   a. Name of the government entity;
   b. Name of the primary contact for the government entity;
   c. Contact information (i.e., address, city, ZIP code, state, and phone number); and
   d. Specific best management practices or minimum control measures being implemented by the government entity.

It is the responsibility of the permittee to provide all information under this report regardless if programmatic BMPs or MCMs are being implemented by another governmental entity. If an entire MCM is being implemented by an alternative governmental entity, please indicated that under the appropriate MCM below.

2. Does the permittee currently utilize, or is working towards develop of an Integrated Plan?   ☐ Yes   ☑ No
If **Yes**, please provide a summary of the status of the Integrated Plan.   **N/A**

PART D – MINIMUM CONTROL MEASURES, BEST MANAGEMENT PRACTICES, AND MEASURABLE GOALS EVALUATION

An attachment is necessary for many items under the MCMs below to provide information regarding the progress toward achieving the statutory goal of reducing the discharge of pollutants to the MS4 to the maximum extent practicable to the MS4. Provide additional informative data, success stories, and experiences that support the successful implementation of your stormwater management plan (SWMP).

MCM 1. Public Education and Outreach

1. *(4.1.A)* Who are the target audiences? _Residents, developers or construction site operators and local government employees_
Were any changes made to target audiences during reporting period?   ☐ Yes   ☑ No

2. (*4.1.B*) *What* are the target pollutants? _Littering/dumping, sediment, household/yard waste, oil and other vehicle fluids_
Were any changes made to target pollutants during reporting period? ☐ Yes ☑ No

3. (*4.1.C*) Were any changes made to educational resources to be used as BMPs (materials, postings, etc.) in conjunction with the selected pollutants for the selected target audiences during reporting period? ☑ Yes ☐ No
If **Yes**, please include an attachment describing changes.

4. (*4.1.D, 4.1.E*) Were any changes made to involvement activities, or support to be used as BMPs (events, activities, etc.) in conjunction with the selected pollutants for the selected target audiences during reporting period? ☑ Yes ☐ No
If **Yes**, please include an attachment describing changes

5. (*4.1.F*) Were all BMPs for MCM 1 evaluated during reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing what BMPs were not evaluated and why.

6. Were the measurable goals for all BMPs for MCM 1 successfully reached? ☑ Yes ☐ No
If **No**, were the measurable goals or BMPs evaluated/modified in an effort for success in the next reporting period? ☐ Yes ☐ No　　**N/A**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

7. Were the BMPs for MCM 1 determined effective/successful for this reporting period? ☑ Yes ☐ No
If **No**, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? ☐ Yes ☐ No　　**N/A**

8. Were any changes made to MCM 1 during the reporting period that were not covered above, including the addition of programmatic BMPs?
☐ Yes ☑ No
If **Yes**, please include an attachment describing changes.

MCM 2. Public Involvement and Participation

1. (*4.2.A, 4.2.B, 4.2.C*) Completing **4.2.A-4.2.C** in this form is only applicable during permit renewal OR as a result of major modification to the SWMP. If neither of these apply during this reporting period, please check N/A here and skip to 3 below. ☑ N/A

2. Was a public notice period held during reporting period? ☐ Yes ☐ No　　**N/A**
Was the public notice posted on the MS4 website? ☐ Yes ☐ No
Was a public information meeting held for the public notice during this reporting period? ☐ Yes ☐ No
If **Yes**, what was the attendance for the meeting? _____
Were any comments received? ☐ Yes ☐ No　If **Yes**, how many? _____

3. (*4.2.D*) Were any changes to publicly available method to accept public inquiries, or concerns, and to take information provided by the public about stormwater and stormwater related topics made during reporting period? ☐ Yes ☑ No
If **Yes**, please include an attachment describing changes.

4. Were all BMPs and tracking methods for 4.2.D evaluated during reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing what BMPs were not evaluated and why.

5. (*4.2.E*) Does the permittee utilize a stormwater management panel or committee during the reporting period? ☑ Yes ☐ No
If **Yes**, was the panel or committee determined to be effective/successful for this reporting period? ☑ Yes ☐ No
If the permittee does not currently utilize a stormwater management panel or committee, did the permittee evaluate the potential benefits of utilizing a stormwater management panel or committee? ☐ Yes ☐ No　　**N/A**

6. Were any changes to 4.2.E made during reporting period? ☐ Yes ☑ No
If **Yes**, please include an attachment describing changes.

7. (*4.2.F*) On what date did the permittee provide an update to the governing board on the status of, or updates on, the Stormwater Management Program, including compliance with the program for this reporting period? _3/13/2024_

8. (*4.2.I*) Were all tracking mechanisms and databases for MCM 2 evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the mechanisms were not evaluated.

9. Were the measurable goals for all BMPs for MCM 2 successfully reached? ☑ Yes ☐ No
If **No**, were the measurable goals or BMPs evaluated/modified in an effort for success in the next reporting period? ☐ Yes ☐ No　　**N/A**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

10. Were the programmatic BMPs for MCM 2 determined effective/successful for this reporting period? ☑ Yes ☐ No
If **No**, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? ☐ Yes ☐ No　　**N/A**

11. Were any changes made to MCM 2 during the reporting period that were not covered above, including the addition of programmatic BMPs?
☐ Yes ☑ No
If **Yes**, please include an attachment describing changes.

12. (*4.3.A*) Were any changes to the storm sewer system map made during reporting period? ☑ Yes ☐ No

13. (*4.3.C*) Were any changes made to the ordinance for prohibition of non-stormwater into the storm sewer system during this reporting period? ☐ Yes ☑ No

14. (*4.3.D*) Was the measurable goal for dry weather field screening met? ☑ Yes ☐ No
If **No**, were the measurable goals evaluated/modified in an effort for success in the next reporting period? ☐ Yes ☐ No　　**N/A**

15. *(4.3.H)* Were the priority areas evaluated for this reporting period? ☑ Yes ☐ No
If **Yes**, were the priority areas determined to be appropriate for the next reporting period? ☑ Yes ☐ No
Will additional or new priority areas be identified for the next reporting period? ☑ Yes ☐ No

16. *(4.3.J)* Were any illicit discharge investigations conducted during this reporting period? ☑ Yes ☐ No
If **Yes**, were the investigation procedures, response times, and tracking mechanisms determined to be appropriate for the next reporting?
☑ Yes ☐ No
If **No**, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? ☐ Yes ☐ No   **N/A**

17. *(4.3.K)* Were MCM 3 enforcement procedures evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

18. *(4.3.L)* Were all tracking mechanisms and databases for MCM 3 evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the mechanisms were not evaluated.

19. *(4.3.M, 4.3.Q)* Were all outreach and internal training procedures for MCM 3 evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

20. Were the measurable goals for all BMPs for MCM 3 successfully reached? ☑ Yes ☐ No
If **No**, were the measurable goals or BMPs evaluated/modified in an effort for success in the next reporting period? ☐ Yes ☐ No   **N/A**
For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

21. (**4.3.N - 4.3.R**) Were the programmatic BMPs for MCM 3 determined effective/successful for this reporting period? ☑ Yes ☐ No
If **No**, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? ☐ Yes ☐ No   **N/A**

22. Were any changes made to MCM 3 during this reporting period that were not covered above, including the addition of programmatic BMPs?
☑ Yes ☐ No
If **Yes**, please include an attachment describing changes.

MCM 4. Construction Site Stormwater Runoff Control

1. *(4.4.A)* Were any changes to the ordinance for construction site stormwater made during this reporting period? ☐ Yes ☑ No
 If **Yes**, please include an attachment describing changes.

2. *(4.4.B)* Were the pre-construction plan review procedures evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the review procedures were not evaluated.

3. *(4.4.C)* Were the procedures for construction site inspections, evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

4. *(4.4.D)* Were construction site enforcement procedures evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

5. *(4.4.E)* Were the procedures for requiring construction site operators to conduct site inspections evaluated during this reporting period?
☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

6. *(4.4.F, 4.4.G)* Were all tracking mechanisms and databases for MCM 4 evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the mechanisms and/or databases were not evaluated.

7. *(4.4.J)* Were all procedures for public submittal of concerns or information related to construction sites evaluated during this reporting period?
☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

8. *(4.4.K)* Were all internal training procedures for MCM 4 evaluated for effectiveness during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

9. *(4.4.L)* Were all procedures outlining the local inspection and enforcement for MCM 4 evaluated during this reporting period?
☑ Yes ☐ No
If **No**, please include an attachment describing why the document(s) were not evaluated.

10. Were the measurable goals for all programmatic BMPs for MCM 4 successfully reached? ☑ Yes ☐ No
If **No**, were the measurable goals or programmatic BMPs evaluated/modified in an effort for success in the next reporting period?
☐ Yes ☐ No
For each of the programmatic BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

11. (**4.4.H, 4.4.I, 4.4.M**) Were the programmatic BMPs and procedures for MCM 4 determined effective/successful for this reporting period?
☐ Yes ☑ No

12. Were any changes made to MCM 4 during the reporting period that were not covered above, including the addition of programmatic BMPs?
☑ Yes ☐ No
If **Yes**, please include an attachment describing changes.

MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment

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1. *(4.5.A)* Were any changes to the ordinance for post-construction runoff site stormwater made during this reporting period?
☐ Yes ☑ No
If **Yes**, please include an attachment describing changes.

2. *(4.5.B)* Were any changes to the permittee's strategy to minimize water quality impact made during this reporting period? This includes any policy or ordinance changes to either structural or non-structural controls. ☑ Yes ☐ No
If **Yes**, please include an attachment describing changes.

3. Were all strategies (programmatic BMPs) for 4.5.B evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing what BMPs were not evaluated and why.

4. *(4.5.C)* Were the pre-construction plan review procedures evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why these procedures were not evaluated.

5. *(4.5.D)* Were procedures for long-term operation and maintenance of the post-development BMPs evaluated during this reporting period?
☑ Yes ☐ No
If **No**, please include an attachment describing why these procedures were not evaluated.

6. *(4.5.E)* Were the procedures for inspections or requiring inspections, evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why these procedures were not evaluated.

7. Were the measurable goals for all BMPs for 4.5.E successfully reached? ☑ Yes ☐ No
If **No**, were the measurable goals evaluated/modified in an effort for success in the next reporting period? ☐ Yes ☐ No   **N/A**

8. *(4.5.F, 4.5.G)* Were compliance and enforcement procedures evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing what BMPs were not evaluated and why.

9. *(4.5.H)* Was the inventory of all post-construction BMPs, including the tracking mechanism, evaluated during this reporting period?
☑ Yes ☐ No
If **No**, please include an attachment describing why these procedures were not evaluated.

10. *(4.5.I)* Were all tracking mechanisms for post-construction BMP inspections, including the tracking mechanism, evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why these procedures were not evaluated.

11. *(4.5.L)* Were all training procedures for inspections evaluated for effectiveness during this reporting period? ☑ Yes ☐ No
No, please include an attachment describing why these procedures were not evaluated

12. Were the measurable goals for all programmatic BMPs for MCM 5 successfully reached? ☑ Yes ☐ No
If **No**, were the measurable goals or programmatic BMPs evaluated/modified in an effort for success in the next reporting period?☐ Yes ☐ No **N/A**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

13. *(4.5.J, 4.5.K, 4.5.M)* Were programmatic BMPs and procedures for MCM 5 determined effective/successful for this reporting period?
☐ Yes ☑ No
If **No**, were the programmatic BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? ☑ Yes ☐ No

14. Were any changes made to MCM 5 during the reporting period that were not covered above, including the addition of programmatic BMPs?
☑ Yes ☐ No
If **Yes**, please include an attachment describing changes.

MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

1. *(4.6.A)* Did the permittee maintain and utilize an employee training program for MS4 municipal operations staff? ☑ Yes ☐ No
What date or dates was the training held during this reporting period? 2/22, 5/10, 8/29, 12/19 and others tracked

2. Were any changes to the training program made during reporting this period? ☑ Yes ☐ No
If **Yes**, please include an attachment describing changes.

3. *(4.6.B)* Were the following topics covered during training for this reporting period?
- Vehicle and equipment washing; ☑ Yes ☐ No ☐ Not applicable
- Fluid disposal and spills; ☑ Yes ☐ No ☐ Not applicable
- Fleet, equipment, and building maintenance; ☑ Yes ☐ No ☐ Not applicable
- Park, open space maintenance procedures (including fertilizer, herbicide, pesticide application); ☑ Yes ☐ No ☐ Not applicable
- New construction, road maintenance, and land disturbances; ☑ Yes ☐ No ☐ Not applicable
- Stormwater system maintenance; ☑ Yes ☐ No ☐ Not applicable
- MS4 operated salt and de-icing operations; ☑ Yes ☐ No ☐ Not applicable
- Fueling; ☑ Yes ☐ No ☐ Not applicable
- Solid waste disposal; ☑ Yes ☐ No ☐ Not applicable
- Street sweeper operations; ☑ Yes ☐ No ☐ Not applicable
- Illicit Discharges; ☑ Yes ☐ No ☐ Not applicable

4. *(4.6.C)* Were training materials, written procedures for the training program, and a schedule for topics evaluated during this reporting period?
☑ Yes ☐ No
If **No**, please include an attachment describing what BMPs were not evaluated and why.

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*5. (**4.6.D**)* Was a list of municipal operations/facilities impacted by the MS4 permit maintained and evaluated during this reporting period?
☑ Yes ☐ No

*6. (**4.6.E**)* Was a list of all industrial facilities owned or operated by the permittee which are subject to NPDES permits for discharges of stormwater associated with industrial activity, maintained and evaluated during this reporting period? ☑ Yes ☐ No

*7. (**4.6.F**)* Were controls and procedures for reducing or eliminating the discharge of floatables and pollutants from municipal facilities evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing what elements and procedures were not evaluated and why.

8. Were inspections conducted on these facilities at minimum annually? ☐ Yes ☑ No

9. Were the stormwater control measures and other programmatic BMPs for **4.6.E** determined effective/successful for this reporting period?
☑ Yes ☐ No
If **No**, were the BMPs, and procedures determined to be ineffective/unsuccessful evaluated for modification or replacement?
☐ Yes ☐ No   **N/A**

*10. (**4.6.G**)* Were procedures for proper disposal of waste removed from the MS4 structures and areas of jurisdiction evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the procedures were not evaluated.

*11. (**4.6.H**)* Was washing of municipal vehicles and/or equipment taking place on a facility owned and/or operated by the permittee during this reporting period? ☑ Yes ☐ No
If **Yes**, were procedures for proper disposal of wash water evaluated during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing what procedures were not evaluated and why.

*12. (**4.6.I**)* Did the permittee maintain written Stormwater Pollution Prevention Plans or an Operations and Maintenance Manual for all applicable MS4 facilities during this reporting period? ☑ Yes ☐ No
If **No**, please include an attachment describing why the document(s) were not created and/maintained.

13. Did the permittee evaluate the results, controls, and inspection procedures to ensure compliance with the permit and determine if changes are needed? This evaluation may also aid in finding priority areas or pollutants in relation to MCM 3, or adding more education in relation to MCM 1. ☑ Yes ☐ No
If **No**, please include an attachment describing what BMPs were not evaluated and why.

14. *(**4.6.J**)* Were any new flood management projects reviewed or begun during this reporting period? ☑ Yes ☐ No
If **Yes**, were procedures used to determine if there are impacts to water quality for the new project? ☑ Yes ☐ No

15. Were the measurable goals for all BMPs for MCM 6 successfully reached? ☑ Yes ☐ No
If **No**, were the measurable goals evaluated/modified in an effort for success in the next reporting period? ☐ Yes ☐ No   **N/A**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

16. *(**4.6.K, 4.6.L, 4.6.M**)* Were BMPs for MCM 6 determined effective/successful for this reporting period? ☑ Yes ☐ No
If **No**, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? ☐ Yes ☐ No   **N/A**

17. Were any changes made to MCM 6 during the reporting period that were not covered above? ☑ Yes ☐ No
If **Yes**, please include an attachment describing changes.

Part E – MONITORING DATA WATER SAMPLE(S) ANALYSIS

Please include monitoring data collected during the reporting period.

PARAMETER OR INDICATOR	FREQUENCY (Ongoing monitoring or single diagnostic event or date)	RESULT	DRY WEATHER SAMPLE?	WET WEATHER SAMPLE?
N/A			☐ Yes ☐ No	☐ Yes ☐ No
			☐ Yes ☐ No	☐ Yes ☐ No
			☐ Yes ☐ No	☐ Yes ☐ No
			☐ Yes ☐ No	☐ Yes ☐ No

1. Are any of the parameters being sampled due to the MS4 being subject to an established or approved Total Maximum Daily Load?
☐ Yes ☑ No
If **Yes**, please indicate the parameter/pollutant.
N/A

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2. Does the data support water quality attainment or support trend data toward water quality attainment?   **N/A**
☐ Yes ☐ No
If **Yes**, please describe.

Part F – TOTAL MAXIMUM DAILY LOAD (TMDL) ASSUMPTIONS AND REQUIREMENTS ATTAINMENT (ARAP) PLAN

1. Is your MS4 subject to an established or approved TMDL? ☐ Yes ☑ No
If **No**, please continue to Part G of this report.

2. Has the permittee submitted the TMDL ARAP to the Department for review and approval? ☐ Yes ☐ No   **N/A**
If **No**, please submit the annual status report providing a brief update on the status of completion of the TMDL ARAP per 6.1.H of the permit.

PART G – SUBMIT REPORT TO:

The facility must register in the Department's eDMR system through the Missouri Gateway for Environmental Management (MoGEM) before the first report is due. Registration and other information regarding MoGEM can be found at; MoGEM Splash Page. Information about the eDMR system can be found at eDMR Splash Page. To access the eDMR system, use: MoGEM Login.
For assistance using the eDMR system, contact edmr@dnr.mo.gov or call 855-789-3889 or 573-526-2082.

OPTIONAL QUESTIONS REGARDING MILITARY SERVICE

Have you or an immediate family member ever served in the U.S. Armed Forces?	☐ Yes	☑ No
If yes, would you like information about military-related services in Missouri?	☐ Yes	☑ No

PART H - CERTIFICATION

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.

SIGNATURE OR PERMITTEE (LEGALLY RESPONSIBLE PERSON)	DATE SIGNED
	FEBRUARY 21, 2025
NAME (PRINTED OR TYPED)	TITLE
Mathew Wohlberg, P.E.	Director of Engineering

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Section B. Stormwater Management Program Progress and Compliance

OVERVIEW

Pursuant to the Federal Water Pollution Control Act and Missouri Clean Water Law, the City of Wentzville has been issued a General State Operating Permit #MO-R0C4075 for the Wentzville Municipal Separate Storm Sewer System (MS4) that expires September 30, 2026.

This MS4 Permit Report summarizes accomplishments for the reporting period of January 1 through December 31, 2024. This report is organized according to requirements of the Missouri Department of Natural Resources (DNR) Stormwater Report Form MO 780-3009.

In 2024 the City of Wentzville was audited by the Missouri Department of Natural Resources. The City was found to be in compliance with permit requirements. The audit focused on Minimum Control Measures (MCM) three through six. Audit findings were reviewed as part of the iterative process for each MCM and the iterative process findings and outcomes are included in this report.

The matrix is divided into six sections corresponding to the permit's required Minimum Control Measures (MCMs). A general summary is provided at the beginning of each section regarding the status of permit compliance as outlined in the City's 2021-2026 Stormwater Management Plan.

More detailed information about the City's permit requirements and the activities reported below are provided in Wentzville's Stormwater Management Plan, available at www.wentzvillemo.gov/stormwater.

Engineering Department employees participate in an on-site SWPPP inspection training.

Stakeholders gather at a stormwater quality basin to discuss design and maintenance challenges during the 2024 Stormwater Facility Lunch & Learn and Bus Tour.

A City Construction Inspector conducts a SWPPP inspection during the DNR audit of Wentzville's Stormwater Management Program (SWMP).

Minimum Control Measure #1: Public Education and Outreach on Stormwater Impacts

Target Audiences: Residents, developers or construction site operators and local government employees. Optional: homeowners or neighborhood associations

Target Pollutants and Sources: Trash from littering/dumping; sediment runoff from construction/land disturbance; and the improper disposal of household/yard waste, oil, grease and fluids from vehicles

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary
All measurable goals for the public outreach component of the Stormwater Management Plan for 2021-2026 are on track and annual accomplishments have been included below. Multi-faceted outreach and involvement strategies and mediums allow the City to continue to reach a variety of audiences. The general public, City employees, construction contractors and homeowners associations are exposed to methods of pollution prevention and reduction through articles, public relations campaigns, newsletters, utility bill inserts, the City website and social media and volunteer opportunities.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete? Yes	No	On-track	Accomplishments
Outreach and Education BMPs								
Information on the MS4 Operator's website;	Maintain a web page with up to date information, & working links. All links shall be checked, and the page shall be updated as necessary at minimum annually. Must be maintained the entire year.	The number of hits shall be tracked. The MS4 Operator shall use this to see which messages get reactions, and if certain messages may need more education.	Ongoing Annual review by November 15	Stormwater Manager			X	1,769 Visits tracked by 1,295 Unique Users
Require installation of permanent embossed, or precast inlets with "No Dumping-Drains to Stream" or similar message.	Requirement for all new inlets in the MS4 area.	Number of inlets, the location of the inlets shall be tracked. These areas shall be noted on MCM #3 dry weather field screenings, and illicit discharge investigations as a method to determine if the markings are effective or if areas could benefit from the markings.	Ongoing	Engineering Managers & Stormwater Manager			X	Standard detail used in EDC; all lids replaced in-house have "Dump No Waste, Drains to Stream" message 100 Inlets marked/updated in GIS 3,995 Total inlets marked *location tracked in GIS*
Publish articles in a local newsletter, may be electronic.	Develop topics that are group-specific and address activities and or pollutants of concern at a seasonally appropriate time. A minimum of two articles annually shall be published or emailed.	To the extent possible evaluate the pollutant before the article, and again after to see if there has been a change. Consider including a mechanism to track active response such as following the social media account or a website to visit. Track those responses to determine if the article was effective in reaching people.	Ongoing	Strategic Communications Officer & Stormwater Manager			X	32 Articles and messages published or emailed to target audiences. Topics: recycling, yard waste, Mission: Clean Stream and volunteer litter cleanups
Promote, host, or develop educational meetings, seminars, or trainings.	The events shall address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff. A minimum of two events shall be held, hosted or promoted annually. These events may address different pollutants/audiences.	Attendance and any distributed education materials shall be tracked. This shall be used to gauge interest in the topic. Consider using a questionnaire or follow-up survey to track if the attendees retained information or found the event beneficial.	Ongoing	Stormwater Manager			X	5 Educational meetings, seminars, or training events held, hosted or promoted 125 Attendees
Targeted education campaign (via mail, email or in-person)	Minimum of one annually OR with a specific event. (Examples: Sediment control with small building permit; leaf litter email during street sweeping season, or education brochure to all businesses conducting certain activity.)	Education material distributed, or amount of people contacted shall be tracked. Follow up on if noticeable behavior has changed.	Ongoing	Stormwater Manager			X	3 Targeted Education Campaigns 22,000 households impacted by material distributed 97,937 social media followers tracked 26,500 e-newsletter recipients 746 commercial entities received a letter addressing litter prevention and maintenance

Involvement BMPs									
Stream/lake or Watershed clean-up events; Litter clean-up events such as street or stream cleanups, park cleanup events, Mission: Clean Stream Adopt-A-Spot;	To be considered an event, the land area cleaned must be at minimum 2 acres, or 400 yards of stream/streambank/watershed, or 2 miles of roadside. (These may be combined such as 1 acre of land and 200 yards of stream.)	Track the area or distance cleaned (by acre, yard or lane miles), the amount of waste removed (by tonnage, cubic yard, or Stream Team bag count) and the attendance. Use the waste measurements to determine if there are priority areas for litter entering stormwater, or areas for illegal dumping.	Ongoing	Stormwater Manager			X	9.64 Miles of streams/roads cleaned 2,101 Pounds of litter removed from streams and roads
Stormwater-related speaker series	Provide a minimum of two sessions a year. These may be different speakers and/or audiences.	Record the attendance, the topic covered, and any training materials distributed. Use these numbers and interactions during the event to determine if the project or training covered a topic of interest and/or a topic that could be brought to a different or wider audience.	Ongoing	Stormwater Manager			X	3 Speaker series held 169 Attendees Materials distributed: Stream Care Guide, Water quality facility flyer Topics covered: Water quality BMP design, construction and inspection and maintenance requirements, procedures and common hurdles and non-point source pollution impacts to streams
Ongoing yard waste collection, designated yard waste collection area, household hazardous waste collection, or street sweeping program.	Provide the service as an annual occurrence or at a readily accessible location. For street sweeping, this shall be conducted at minimum twice a year.	Track the amount collected. If educational information is being used in conjunction with this activity, track for changes due to the education. Tracking can be used with illicit discharge tracking, to determine if the rate of this type of discharges or dumping was reduced.	Ongoing	Director of Public Works			X	Ongoing yard waste collection and monthly/quarterly street sweeping services provided with the following material removed: 184 Tons from street sweeping 1,613 Cubic yards from yard waste collection

2. PROGRESS TOWARDS ACHIEVING THE STATUTORY GOAL OF REDUCING THE DISCHARGE OF POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE (MEP) TO THE MS4

The quantifiable accomplishments listed above demonstrate the City's commitment to education and services that successfully reduce pollutants to the MEP. During this reporting period, these strategies effectively met goals and targeted audiences. Ongoing digital educational materials were refreshed and updated as needed.

Audiences targeted for litter outreach included those identified in the SWMP, as well as businesses in the commercial district. As part of this targeted litter prevention and maintenance education campaign, educational letters were sent to 746 businesses. Efforts aim to create a network of support for local businesses and promote partnerships in our community to address litter concerns and promote environmentally-minded practices.

Property owners/HOAs are introduced to newly constructed Water Quality (WQ) facilities through a site visit handoff meeting with the developer and city prior to facility acceptance by the City. At this meeting, a City inspector is present to address concerns and questions regarding future inspection and maintenance requirements. This meeting intends to bridge communications and resolve potential misunderstandings or confusion, thereby setting property owners up for long-term success. HOAs receive information regarding WQ facilities at the HOA Symposium via presentations and one-on-one conversations.

In addition to these opportunities, the City hosted a new event, the Stormwater Facility Lunch & Learn and Bus Tour to foster discussions on post-construction water quality (WQ) best management practices (BMPs). The event brought together 42 stakeholders, including engineering designers, developers, residents, installation and maintenance contractors, and MS4 employees from various local and state government agencies. The event provided a platform for a collaborative review of facility designs and field observations of diverse BMP types. Breakout discussions and site visits generated valuable feedback on design constraints, efficacy, longevity, and maintenance needs of current BMPs. Key takeaways included the importance of adaptable facility designs for varied site conditions, the role of forebay design, and the need for both regional consistency and clear maintenance guidelines to ensure long-term performance. This insight will inform future updates to the City's design criteria. The event fostered productive dialogue and strengthened the City's collaborative approach to improving stormwater management practices. The City will look to this model for future stakeholder training and engagement opportunities.

The student-focused outreach and education activities are also notable. In 2024, over 290 students, six educators, and eight parents/guardians collected stream water quality data. This event paired Stream Team trained monitors from General Motors, St. Charles County and St. Charles Soil and Water Conservation District to be student mentors. This program includes an Enviroscape demonstration, a stream water quality monitoring field trip, and a community walkabout to a local park. These activities remain an important part of Wentzville's education program and foster water quality stewardship in our community

Supporting Programs, Initiatives and Materials:
1) Stormwater Facility Lunch & Learn and Bus Tour
2) Wentzville Sustainability Partners Program
3) Utility bill inserts/door hangers/fact sheets: Stream Care Guides, "Pollution Found in Your Area" door knockers, and Mission: Clean Stream utility bill inserts were distributed
4) HOA Symposium
5) Post-construction WQ BMP site visit and/or handoff meetings: 5 meetings held
6) Cityscapes inaugural publication (mailed citywide) highlights post-construction BMP ownership and maintenance

3. NOTICE THAT THE CITY IS RELYING ON ANOTHER GOVERNMENT ENTITY TO SATISFY PERMIT OBLIGATIONS (IF APPLICABLE)

| Name of Government Entity: | N/A | | Contact Info: | | | |
| Primary Contact: | | | Specific BMPs or MCMs Entity Implements: | | | |

4. CHANGES TO THE SWMP, BMPS OR THE MEASURABLE GOALS AND THE ITERATIVE PROCESSES THAT OCCURRED

The Public Education and Outreach on Stormwater Impacts Program was reviewed with regards to the BMPs tracked above to evaluate their effectiveness and implementation.
EVALUATE – Do the listed education/outreach BMPs target specific audiences and pollutants likely to have significant stormwater impacts? Do the listed BMPs target pollutants that were observed at illicit discharge concerns or inspections? **YES**
EFFECTIVE – Y or N? If no, change the target pollutants or audiences or change how the BMPs are administered to better address the observed pollutants or illicit discharges. Re-evaluate. If yes, keep target pollutants and audiences the same. **YES**
CHANGES – Are implementation procedures or BMPs updates required? **NO**

Were changes made and noted?
NO. There were no changes made to the SWMP, BMPs or measurable goals. The materials used for the targeted educational campaign were updated and additional trainings were offered as noted above.

5. LIST OF BMPS EVALUATED AND HOW BMPS WERE DETERMINED EFFECTIVE

Date of Review(s): 2/14/2024, 9/17/2024
Reviewers: Jamie Paige, Kelly Dunlap, William Reese and Wentzville's communication department.

BMPs EVALUATED:
Following a comprehensive review of all BMPs related to public outreach and involvement in the 2021-2026 Stormwater Management Plan, staff determined that target audiences and pollutants are addressed by at least one listed BMP. Implementation remains appropriate and effective in achieving measurable goals. Additionally, the Stormwater Advisory Committee, volunteers, City employees, educational event participants, and co-hosting organizations provided feedback on BMPs, including training and education events, outreach materials and programs. The Building Code Enforcement Division updated handouts as an educational tool to address concerns before issuing violation notices related to litter. Feedback from all stakeholders continues to be reviewed and incorporated across various media: utility bill inserts, newsletters, social media, and stakeholder events such as the Stormwater Facility Lunch & Learn and Bus Tour and employee training.

Minimum Control Measure #2: Public Participation

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

All public participation tasks are completed, or on-track for being achieved. Board of Aldermen and Stormwater Advisory Committee meetings comply with state and local public notice requirements. Agendas and minutes are available on the City website. Stormwater Advisory Committee meetings engage stakeholders such as residents, trustees and businesses to help evaluate and improve the Stormwater Management Program. Meetings include an overview of permit-related activities and opportunities for input and guidance on what is appropriate for the community. The Concern Hotline and website continues to be useful to gauge customer knowledge, behaviors and attitudes when they report pollution and connect with staff to inquire about stormwater quality-related topics.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete? Yes	No	On-track	Accomplishments
SWMP Public Notice Period	30-day minimum public notice period for the draft permit and description of the SWMP which includes posting the SWMP online and providing a way for the public to submit comments	Track site visits. Track and respond to comments	Jan. 2021 Jan. 2026	Stormwater Manager	X			Public Notice Date: 1/25/2021 Renewal Application Date: 3/8/2021 SWMP available at www.wentzvillemo.gov/stormwater
SWMP Public Meeting	Post meeting date, time and location on website at least thirty days prior to meeting	Track meeting attendance and topics covered	Jan. 2021 Jan. 2026	Stormwater Manager	X			Public Meeting Notice Date: 1/25/2021 Public Notice posted on Website Public Meeting Date: 2/25/2021 Location: City Hall and virtual *agendas & minutes with attendance and topics are on the City's website
Concern Hotline	Annually advertise and maintain hotline with concern tracking system for citizens to report pollution or stormwater issues.	Annually track the topic, location and concern received and follow-up	Ongoing	City Clerk			X	Concern Hotline advertised on website and in articles; 223 Stormwater and pollution concerns tracked *concerns are tracked in the City's Customer Service Center system
Stormwater Advisory Committee (optional BMP)	Implement a Stormwater Management Panel with citizen representation	Track meeting attendance, topics and feedback through agendas & minutes	Ongoing	Stormwater Manager			X	Are citizens on the panel? YES Is attendance recorded? YES *agendas & minutes containing attendance and topics can be found on the City's website
SWMP Update to the Governing Board	Annually update the City Board of Aldermen on SWMP status, compliance and updates	Track date and method of update	Annually by December 15	Director of Engineering and/or Stormwater Manager			X	Date of Update: 3/13/2024 Method of Update: Public Meeting MS4 Representative: Jamie Paige

2. PROGRESS TOWARDS ACHIEVING THE STATUTORY GOAL OF REDUCING THE DISCHARGE OF POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE (MEP) TO THE MS4

Opportunities for public involvement in the development of the SWMP and the accomplishments listed above demonstrate the successful implementation of BMPs/tasks to meet the measurable goals designed to reduce pollutants to the MEP. The City of Wentzville implements various activities to engage the public and key stakeholder groups and organizations in pollution prevention BMPs.

In 2024, the City of Wentzville hosted a Stormwater Facility Lunch & Learn and Bus Tour. This event was designed to provide stakeholders with an opportunity to give feedback on the existing City of Wentzville post-construction water quality BMP design criteria. Attendees included design engineers, installation and maintenance contractors, Wentzville residents, and other industry professionals. This event and the feedback received represent one of the initial steps in reviewing current standards.

Supporting Programs, Initiatives and Materials:
1) Stormwater Facility Lunch & Learn and Bus Tour
2) Mission: Clean Stream: Volunteer surveys provide public feedback after the event regarding the types and locations of pollutants found, as well as the effectiveness of BMPs.
3) Litter Strategy and Partnerships: Includes Wentzville Sustainability Partners and the Adopt-A-Spot program.

3. NOTICE THAT THE CITY IS RELYING ON ANOTHER GOVERNMENT ENTITY TO SATISFY PERMIT OBLIGATIONS (IF APPLICABLE)

Name of Government Entity:	N/A	Contact Info:					
Primary Contact:		Specific BMPs or MCMs Entity Implements:					

4. CHANGES TO THE SWMP, BMPS OR THE MEASURABLE GOALS AND THE ITERATIVE PROCESSES THAT OCCURRED

The public participation program was reviewed with regards to attendance, inquiries or concerns to determine the effectiveness of 1) how to best reach the public, 2) the mechanisms used, 3) reaching the public and the MS4 governing board; and if the community and MS4 are working together to improve water quality.
EVALUATE – Do BMPs provide opportunities for SWMP input from citizen representatives, stakeholders and volunteers? **YES**
EFFECTIVE – Y or N? If no, change strategy to better address the target audience. Re-evaluate. If yes, continue BMP to track tasks and measurable goals to see if involvement level continues or increases. **YES**.
CHANGES – Are implementation procedures or BMPs updates required? **NO**

Were changes made and noted?
NO. There are no proposed changes to the SWMP, BMPs or measurable goals at this time.

5. LIST OF BMPS EVALUATED AND HOW BMPS WERE DETERMINED EFFECTIVE

Date of Review(s): 1/2/2024

BMPs EVALUATED:
The elected and optional BMPs listed above as "on track" were evaluated and determined to be effective in actively engaging the public in the development and implementation of the Stormwater Management Program. Achievements remain quantifiable and measurable goals meet permit requirements. The Stormwater Advisory Committee public meetings offer an opportunity to review the permit, MCMs and SWMP to evaluate and improve program effectiveness. The committee continues to provide valuable feedback and insight on many of the MCMs in 2024, including the post-construction BMP program and public outreach and education activities and events. The Concern Hotline remains an effective method to encourage citizens to connect to the City to report activities that may cause pollution.

This MCM was not formally reviewed in the 2024 MS4 Audit, though comments were provided by the auditor. Comments focused on the City's efforts to target many stakeholder groups on a diverse number of topics. The MCM reviews with the Stormwater Advisory Committee are particularly helpful to achieve this because of the opportunity to provide detailed information and have an interactive format for discussion. In 2025, an effort will be made to continue to utilize the Stormwater Advisory Committee to refine the City's SWMP and to engage stakeholders involved in design and construction to refine the City SWMP policies and practices as well as construction design criteria.

Minimum Control Measure #3: Illicit Discharge Detection and Elimination

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

All measurable goals are on track for completion and the regulatory mechanism for stormwater pollution control is enacted. The GIS data collection system continues to track inspections and maintenance with water quality indicators. Through dry weather field screenings, the City inspects permitted outfalls and outfalls based on public concern to determine compliance and locations of illicit discharges. All outfalls are mapped in the GIS storm system map and updated each year as developments are dedicated. Staff continue to define, schedule and inspect MS4 permitted and priority outfalls and refine outfall asset details based on the new permit definition and subsequent clarifications from the permitting authority. Training opportunities and flyers continue to educate staff and the public on ways to get involved in detecting the source of illicit discharges. Alternative disposal options are available to customers for large-item pickup, yard waste and Household Hazardous Waste collected within the planned growth boundary.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete? Yes	Goal Complete? No	Goal Complete? On-track	Accomplishments
Storm System Mapping	Continue to update GIS map with stormwater outfalls, receiving waters and MS4 boundary.	Track the numbering/naming system of all outfalls; dates locations were verified and/or last field surveyed; and for newly added outfalls, the date added to the storm sewer system	Ongoing	Assistant Director of Engineering & Stormwater Manager			X	Outfalls, receiving waters and updated municipal boundary are mapped.
	Map MS4 outfalls per new definition in accordance with 4.3.O		November 2025				X	Mapped outfall details continue to be refined to delineate MS4 outfalls based on the new permit definition and subsequent clarifications from the permitting authority. MS4 outfalls are inspected as part of the dry weather outfall screening program.
Dry Weather Field Screening Strategy	Screen priority areas, such as those listed in 4.3.H, each year.	Prioritize and track MS4 outfalls screened based on priority areas (i.e. areas with ongoing or a history of illicit discharges, known litter/dumping issues, or increased citizen complaints). Priority areas may be revised as needed based on findings/concern resolution.	Annually by November 15	Stormwater Manager			X	Priority areas identified for 2024 consisted of outfalls in high-density commercial areas and older residential neighborhoods, including outfalls of drainage areas of previous concerns.
	Screen a minimum of 60% of all MS4 outfalls during the permit cycle.	Track the number of MS4 outfalls screened; annually review pollutants discharged, locations and the effectiveness of outreach and enforcement to determine what modifications may be needed.	Ongoing through March 2026				X	171 MS4 outfalls cumulatively screened during the permit cycle
Stormwater Pollution Control Ordinance	Maintain one ordinance(s) with provision for enforcement to prohibit non-stormwater discharges to the MS4	Regulatory mechanism with sanctions for enforcement continues to be in place and updated as needed to reflect new permit conditions	Ongoing	Stormwater Manager	X			Ordinance #3096 enacted
Illicit Discharge Detection & Enforcement	Conduct investigations in response to field screenings, complaints and spills.	Maintain a database or centralized system for tracking incidents, investigations, enforcement and follow-up.	Ongoing	Stormwater Manager			X	7 Illicit discharge concerns tracked
	Document all concerns and locations and removals of illicit discharges		Ongoing				X	All illicit discharge concerns are documented on the IDDE Tracking Form (6 illicit discharges incidents found in 2024; 10 removed/resolved; 2 ongoing)
	Combine the written procedures listed in SWMP MCM 3 into an Illicit Discharge SOP		March 2025		X			IDDE SOP completed June 2024

IDDE Training Program	Implement or maintain an employee training program for applicable staff in conjunction with MCM 6, and within one year of being hired. Topics will target staff that routinely come into contact with materials which may become, or otherwise observe illicit discharges or illicit connections to the storm system. This includes spills, improper disposal, mismanagement, improper vehicle or equipment washing or rinsing as indicated by the O&M Manual	Continue to track the training topics in the O&M Manual and the number participants. Review training frequency and effectiveness after site inspections or incidents. Consider ways to survey or test staff to see if the training is effective.	November 2022 and ongoing	O&M Program Responsible Party Stormwater Manager			X	75 Participants trained IDDE staff training Included the City's Operations & Maintenance Plan, all target pollutants listed in MCM 1 and pollutants observed from concerns such as sediment and surfactants. Stormwater staff maintain Missouri Stream Team water quality data collection training/certification
Stormwater Pollution Prevention Outreach	Annually inform target staff and the public about illicit discharges and the hazards of improper waste disposal by posting pollution detection information, alternative disposal options and/or the 24-hour Customer Service Center reporting form on the City website, in newsletter articles, using Pollution Found Doorknockers in areas of concern and/or with the O&M Program Manual or Training.	Track outreach methods used. Review outreach effectiveness biennially or as needed to consider updates or enhancements to improve reaching target audiences and outreach messages	November 2023 and ongoing	Strategic Communications Officer and Stormwater Manager			X	Outreach methods used: The City website features ways to identify pollution, alternative disposal methods and a 24-hour reporting form. 32 Articles published on the website and in newsletters covering recycling, yard waste and litter pickup. City employee trainings are required as part as the O&M Program.

2. PROGRESS TOWARDS ACHIEVING THE STATUTORY GOAL OF REDUCING THE DISCHARGE OF POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE (MEP) TO THE MS4

Accomplishments listed above document how goals were achieved, and demonstrate success in reducing pollutants to the MEP. The Stormwater Pollution Control Ordinance continues to provide a process for incident inspection, response, and enforcement/remediation cost recovery, if needed. Through the Preventative Maintenance Program, staff continue to complete routine inspections and CCTV of older infrastructure across the City, and prior to acceptance/dedication of new infrastructure. This helps locate priority areas for storm system repairs and identify sources of illicit discharges.

As noted above, public concerns were investigated and tracked regarding illicit discharges. Priority area screening helped to identify outfalls with suspected discharges and trace sources of pollution. Pollution prevention and O&M training for city employees continue to help alert MS4 operators of potential illicit discharges during other city inspections and other activities.

As of 2024, outfall reviews and dry weather screening inspections remain on track to meet permit goals. While the overall outfall map is continuously maintained and updated with newly dedicated infrastructure, the determination of which outfalls qualify as MS4 outfalls under the revised definition is ongoing. Initial review and inspection efforts focused on high-priority areas, such as aging infrastructure and commercial zones, and have now progressed to primarily residential areas.

2025 will see a review of the City's stream monitoring program. The City has collected water quality data in Peruque Creek at least once a year, usually twice, consistently since 2017. As part of the Peruque Creek Watershed Plan, the City will be working with local stakeholders to review monitoring procedures and locations. City has found these monitoring activities not only beneficial for collecting trend data, but as a way to further engage local partners and stakeholders.

Supporting Programs, Initiatives and Materials:
1) Stormwater Pollution Prevention Outreach: MS4 staff, Code Compliance, the Employee Green Team, Economic Development and Parks continue to partner to educate and incentivize business owners and customers to reduce litter in waterways and parks using Helping Hands, the Adopt-A-Spot program and the Wentzville Sustainability Partners program.
2) Alternative disposal opportunities: The City's annual electronics recycling events, as well as curbside yard waste and large item trash pickup days, and St. Charles County's Household Hazardous Waste Collection Program provide convenient disposal options for the public.
3) Updated Publication: Stormwater Pollution Found Door hangers

3. NOTICE THAT THE CITY IS RELYING ON ANOTHER GOVERNMENT ENTITY TO SATISFY PERMIT OBLIGATIONS (IF APPLICABLE)								
Name of Government Entity:	N/A		Contact Info:					
Primary Contact:			Specific BMPs or MCMs Entity Implements:					

4. CHANGES TO THE SWMP, BMPS OR THE MEASURABLE GOALS AND THE ITERATIVE PROCESSES THAT OCCURRED

The IDDE program was reviewed with regards to new permit conditions and the BMPs tracked to evaluate their effectiveness and implementation.
EVALUATE – Are pollutants observed from concern inspections and screenings the same as those targeted by the education/outreach and enforcement BMPs and SOPs? **YES**
EFFECTIVE – Y or N? If no, change target pollutants/audiences, screening strategies, inspection and/or enforcement procedures based on types of concerns received and inspection results. Re-evaluate. If yes, maintain BMPs and SOPs based on types of concerns received and inspection results. **YES**
CHANGES – Are implementation procedures or BMPs updates required? **NO**

Were changes made and noted?
NO. There are no proposed changes to the SWMP, BMPs or measurable goals at this time.

5. LIST OF BMPS EVALUATED AND HOW BMPS WERE DETERMINED EFFECTIVE

Date of Review(s): 5/30/2024, 6/17/2024
Reviewers: Jamie Paige, Kelly Dunlap and William Reese

BMPs EVALUATED:
All Illicit Discharge Detection and Elimination BMPs have been evaluated and determined to be effective using the iterative process above. The Stormwater Pollution Control Ordinance was deemed appropriate and continues to be used for enforcement procedures. During dry weather field screenings, priority areas were reviewed and updated based on concerns and IDDE investigations and screenings. The City utilizes a centralized GIS-based asset inventory system to track and prioritize inspection workflows. In 2024 more City employees were trained to perform and lead dry weather outfall screenings. As part of this training process and the inclusion of other employees in the inspection process, the IDDE SOP was refined and updated, as well as other inspection forms and tracking measures. As outfalls are reviewed under the MS4 permit definition, inspections are scheduled. The centralized tracking system for incidents, investigations and enforcement meets permit and city needs.

The 2024 audit findings complement the City's IDDE program and training. The City will continue to refine and adapt this program as needed, with a focus on preventive education programs.

Minimum Control Measure #4: Construction Site Stormwater Runoff Control

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

All ordinances are enacted, and procedures for the construction runoff control component of the Stormwater Management Plan are on track to meet measurable goals and permit conditions. Grading and improvement plans are reviewed for compliance with City codes. Stormwater pollution prevention plans (SWPPP) and sediment and erosion control plans are integrated into all site plan reviews greater than an acre. The Erosion and Sediment Control Ordinance and inspections continue to remain the primary tool to require BMPs at construction sites. The ordinance includes sanctions to ensure compliance per permit section 4.4.A. In addition, Ord. 3634 includes an individual lot deposit ($1,000 per lot or $10,000 citywide lot deposit) that covers SWPPP BMP installation, maintenance and removal through the residential building permit construction phase.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete? Yes	No	On-track	Accomplishments
Construction Site Stormwater Runoff Control Ordinance(s)	Maintain one law, ordinance and/or regulatory mechanism with sanctions to require site operators to implement, and maintain BMPs to reduce pollutants to the MS4	Regulatory mechanism continues to be in place and defines sanctions for enforcement Update ordinance to reflect new permit conditions as needed	Ongoing	Director of Engineering	X			Municipal Code Chapters 515 and 410 (Ord. #3146 and #3634) continue to be enacted to regulate land disturbance projects and guarantee maintenance and improvements.
Pre-Construction Site Plan Reviews (SWPPP)	Review plans for construction projects >1 acre or smaller sites part of a larger common plan using a standardized checklist or criteria for consistency to incorporate consideration of water quality impacts such as slope, project size, proximity and sensitivity of receiving waters.	Annually track the number of engineering plan reviews. Evaluate the plan review SOP and criteria to consider ways to improve consideration of or reduce water quality impacts	Ongoing	Engineering Managers			X	23 Pre-Construction Site Plan Reviews
Construction Site Inspections & Enforcement	Establish and maintain authority and implement procedures for inspecting land disturbance projects including an escalating enforcement policy.	Maintain an inventory for tracking active public and private projects including contact info, size of disturbance and site priority level.	Update procedures by November 2023	Director of Engineering	X			Municipal Code Chapter 515 authorizes inspection, enforcement and SWPPP submittal requirements of land disturbance projects > 20,000 sq. ft. The Development Inspection SOP is implemented.
	Annually track oversight inspections, corrective and enforcement action by retaining the Development Construction Site SWPPP Inspection Forms and related correspondence.	Review SWPPP inspection reports to evaluate needs to modify inspection priorities, training or enforcement procedures to better identify priority areas, assess compliance, evaluate BMP effectiveness and improve consistency.	Ongoing				X	Active projects are tracked electronically in a centralized folder: 8 Public (Capital) Projects 79 Private (Development) Projects 398 Private (New Residential Construction Permits) MS4 Oversight Inspections: 24 on Public (Capital) Projects 35 on Private Development 796 on Private Lots 556 Contractor inspections reviewed Site inspections are prioritized by site size, proximity to surface water, history of non-compliance, etc.
	Continue to receive and consider information submitted by the public using the Customer Service Center and/or storing correspondence in the development project file.	Respond to and annually track concerns and information received to determine if and what plan review, inspection and enforcement modifications are needed.					X	Customer Service Center is advertised through website & articles 24 Stormwater concerns tracked

Construction Site Runoff Control Training for MS4 inspectors and plan reviewers	Provide, or support access to, and track training once during the permit cycle at a minimum, or as needed	Track the staff attendance, topics and training provider/method used	Ongoing	Director of Engineering & Stormwater Manager			X	2 Training hosted and promoted 9 Total Attendance Topics covered: MS4 permit inspection requirements, proper BMP selection, installation, inspection and/or maintenance. Training Provider/Method: MS4 Operators and Senior Civil Engineer/ In-person meetings (onsite and in office) Inspectors and plan reviewers trained on sediment and erosion control BMP installation and maintenance. Provider/method: Department construction meetings and St. Charles County Stormwater Seminar

2. PROGRESS TOWARDS ACHIEVING THE STATUTORY GOAL OF REDUCING THE DISCHARGE OF POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE (MEP) TO THE MS4

The BMPs/task progress and accomplishments listed above demonstrate reducing the discharge of pollutants to the MEP. Standard procedures for plan review include city staff evaluating land disturbances and pollution prevention strategies through pre-construction site plan review and comment prior to permitting. At project pre-construction meetings, contractors are provided a fillable SWPPP inspection report to help meet permit obligations, and sediment/erosion control BMPs and requirements are reviewed. In addition, inspectors visit their assigned active grading sites to conduct SWPPP inspections, typically at rough grading, to ensure erosion and sediment controls are installed. Inspectors review SWPPP reports for compliance. Erosion control checks at residential footing inspections and review of construction site runoff controls at final yard inspections are completed for new residential building permits. SWPPP training opportunities for builders, contractors and staff inspectors took place this year, including a training hosted by St. Charles County and attended by plan reviewers and construction inspectors. The 24-hour online reporting tool remains instrumental for citizens to report issues to help reduce the discharge of pollutants.

In the state's 2024 SWMP audit, Missouri DNR recommended that City inspectors observe the receiving stream during SWPPP inspections to confirm if there are sediment or pollutant impacts. City employees inspect perimeter sediment and erosion control BMPs as one part of their oversight of SWPPP inspections. Inspectors are trained in the importance of initial BMP installation and regular maintenance of parameter and outfall BMPs.

Supporting Programs, Initiatives and Materials:
1) Stormwater Facility Construction Inspection Form
2) Stormwater and CCTV inspections for new construction

3. NOTICE THAT THE CITY IS RELYING ON ANOTHER GOVERNMENT ENTITY TO SATISFY PERMIT OBLIGATIONS (IF APPLICABLE)

Name of Government Entity:	N/A	**Contact Info:**						
Primary Contact:		**Specific BMPs or MCMs Entity Implements:**						

4. CHANGES TO THE SWMP, BMPS OR THE MEASURABLE GOALS AND THE ITERATIVE PROCESSES THAT OCCURRED

The construction site stormwater runoff control program was reviewed with regards to the BMPs tracked above to evaluate their effectiveness and implementation.
EVALUATE – Are pollutants observed from concerns and inspections the same as those targeted by the training, inspection and enforcement BMPs? **YES**
    – Do SOPs and ordinances require operators to implement and maintain BMPs to reduce pollutants to the MS4? **YES**
EFFECTIVE - Y or N? If no, change target pollutants/audiences, inspection/enforcement priorities, SOPs or ordinances based on the types of concerns received and inspection observations or results. Re-evaluate. If yes, keep target pollutants/audiences, SOPs, etc. based on types of concerns received and inspection observations/results. **NO**
CHANGES – Are implementation procedures or BMPs updates required? **YES**

Were changes made and noted?
YES. Changes noted at the year-end review are detailed below for implementation in 2025.

5. LIST OF BMPS EVALUATED AND HOW BMPS WERE DETERMINED EFFECTIVE

Date of Review(s): 8/13/2024, 8/29/20204, 1/21/2025
Reviewers: Jamie Paige, Kelly Dunlap, William Reese, Construction Inspectors and Plan Reviewers

This annual review may include, but is not limited to:
- X *Evaluating the most common violations, how the violations are handled, how many are escalated;*
- X *If the education program can assist in reducing violations;*
- X *Determining if the site plans match the sites when violations arise or if additional items need to be evaluated at plan review;*
- X *Assessing public complaints being addressed in a timely manner; and*
- X *Evaluating if the inspections are thorough and consistent across different sites.*

Ordinances, inspection and enforcement procedures, pre-construction site plan reviews, and inspector training were reviewed alongside the topics marked with an "X" in the list above. Sediment and erosion control ordinances were also reviewed for effectiveness based on customer concerns, common violations, and enforcement strategies. Training opportunities for construction inspectors are available on a one-on-one basis by request. Both office- and field-based training are generally provided annually. Inspectors received training on topics such as concrete washouts, SWPPP inspection frequency, and procedures to help reduce violations.

As part of a new development tracking system, the Development Inspection and Development Review SOPs, checklists, and workflows were reviewed. Evaluations of pre-construction site plan reviews and feedback from MS4 inspectors and plan reviewers remain essential tools to confirm that SWMP BMPs are appropriate and effective in achieving program goals. Additional resources and training tailored to site plan reviews and SWPPP plans were identified as beneficial and have been requested to support BMP installation and maintenance schedules. This effort continues to evolve. Recommendations for improving inspection and reporting consistency have been incorporated into training and will be revisited in 2025.

Following the review of the 2024 SWPPP oversight inspections, additional training opportunities have been identified. These include the implementation of a new development permit tracking program aimed at improving communication with developers and builders, and streamlining the submittal and inspection process. It also includes on-site City employee training opportunities to refine procedures and enhance consistency. Staff from Community Development, Parks & Recreation, and Public Works will be invited to participate in on-site training sessions with the Engineering Division. The iterative review also helped realize that city construction inspectors are underutilizing oversight reviews of SWPPP submittals from developers and builders. Prior to this permit cycle (2021-2026), the City did not require SWPPPs to be submitted for developments, instead submittals were requested when additional oversight or enforcement was needed. Now, as part of the development pre-construction meeting, the City requires SWPPP submittals in accordance with permit frequency requirements. However, it appears this BMP review process is not being fully leveraged. Training on how to effectively use SWPPP submittals will be provided in 2025. Consistency training will also be expanded to ensure uniform application of procedures and standards across inspections.

Minimum Control Measure #5: Post-Construction Stormwater Management in New Development and Redevelopment

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

All ordinances and procedures for the post-construction component of the Stormwater Management Plan are completed, or on track to meet measurable goals. The Engineering Design Criteria provide standards for long-term stormwater quality facilities, as well as operations and maintenance plans and guarantees for maintenance. The water quality facility handoff meeting, oversight inspections, complice assistance and enforcement process supports property owners in their operation and maintenance program. Planned growth policies help guide staff, developers, and elected boards when making land use decisions and directives.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete?			Accomplishments
					Yes	No	On-track	
Post-Construction Runoff Ordinance (Engineering Design Criteria)	Maintain ordinance(s) that adopt design standards using a combination of structural and/or non-structural controls to minimize water quality impacts in accordance with permit conditions	Regulatory mechanism continues to be in place and defines maintenance responsibilities Update ordinance to reflect new permit conditions as needed	Ongoing	Director of Engineering	X			Municipal Code Chapters 505.200 (Ord. #2878 and revised by #3276 and #3635) continue to be enacted
Non-Structural Post-Construction Controls (Planned Growth Ordinances and Policies)	Maintain ordinance(s) that adopt preventative actions that involve management and source controls in accordance with permit conditions such as:	Track application of ordinances and Comprehensive Plan objectives through land use and improvement plan reviews. Review policies & standards as part of adaptive management and update as needed.	Ongoing	Director of Engineering Director of Community Development	X			23 Site plan reviews tracked;
	Protect sensitive areas (stream riparian corridors and wetlands)	Natural Watercourse Protection Ord. (25' buffer or more based on size) and Floodway Districts						Natural Watercourse Protection Ord. and Floodplain Management implemented
	Promote green infrastructure, minimizing impervious surfaces, disturbance of soil/vegetation	Engineering Design Criteria and Land Use Plan Reviews and Policy						EDC promotes impervious cover reduction. Land use plan reviews assess site design options for protecting sensitive areas and minimizing disturbances.
	Direct growth to identified areas, re-development, infill, and brownfields	Wentzville Comprehensive Plan						Comprehensive Plan adopted in 2018 guides land use decisions. The 2022 Amendatory Supplement incorporates and strengthens existing chapters and goals regarding topics such as alternative means of transportation, land development, climate-resilient utilities and responsible resource utilization.
	Maintain/increase open space	Tree Preservation and Planned Development Ordinances address preservation or open space minimums. Parks & Recreation parklands increase open space						Open space, tree preservation and planned district ordinances are in place. Ord. 3660 improves the intent of Planned Development zoning requests to encourage this goal.

BMP	Description	Measurable Goal	Timeline	Responsible Party	Yr 1	Yr 2	Yr 3	Status/Notes
Pre-Construction Site Plan Reviews (Water Quality Non-structural & Structural BMPs)	Conduct plan reviews to assess site characteristics at the beginning of the design phase to ensure adequate planning for stormwater program compliance using a standardized plan review checklist. Evaluate non-structural BMP selection first using tools such as comprehensive plans, zoning ordinances, buffer strips and/or maximization/preservation of open space.	Annually track the number of engineering plan reviews. Evaluate the plan review SOP and/or checklist to consider ways to assess compliance and/or consistency	Ongoing	Engineering Managers			X	23 Pre-construction site plan reviews 9 Sites required water quality BMPs
							X	Non-structural BMPs are reviewed using Planned Growth Ordinances and Policies outlined above
BMP Operations & Maintenance Plans and Agreements	Agreements and maintenance plans are maintained on file for 100% of BMPs in affected developments	Annually review O&M plan and agreement requirements. Use staff feedback for potential improvements to improve long term O&M and records retention.	Ongoing	Engineering Managers			X	Maintenance covenants and plans tracked for 100% of water quality BMPs
Water Quality Structural and Non-structural BMP Inspections & Enforcement	Inspect, or require inspection of, each water quality structural and non-structural BMPs to meet the following permit-required number of inspections/frequencies and tracking: a) 1 or more during construction b) 1 before the site is finalized (to verify they are built as designed, and any boundaries or practices for non-structural BMPs are observed) c) 1 or more during the first three years after installation by the MS4 Operator d) Annually by the BMP owner/operator or by the MS4 Operator e) 60% or more of all water quality BMPs by the MS4 Operator in the five-year permit cycle, including those with ongoing/open enforcement Begin enforcement action within 30 days of discovering a violation (i.e. verbal, education, notices, fines etc.)	Evaluate ordinances and SOPs to determine if changes are needed to accomplish the inspection and enforcement goals of this BMP. If changes are needed, adopt changes by 11/2/2023 and evaluate if a written water quality BMP inspection and enforcement SOP needs to be formalized. Annually review inspection reports and trends with enforcement; evaluate if inspection priorities or enforcement should be modified based on need	Adopt changes by 11/2/2023 Ongoing	Engineering Manager & Stormwater Manager	X			Municipal Code and Maintenance Covenants authorize inspection and enforcement. Development Inspection SOP requires BMP construction inspection. Stormwater Facility Inspection SOP was updated June 2024. a) Inspections occur during the construction phase and are documented in final inspection reports and Stormwater Facility Construction Inspection Forms. b) Inspections including review of material submittals and/or as-builts occur prior to BMP acceptance. Site handoff meetings are hosted with property owners to improve awareness of water quality BMP requirements. c) Oversight inspections are performed during the first three years after BMP acceptance. d) Recorded Maintenance Covenants require annual inspections. e) 18% of water quality BMPs have been inspected by the MS4 operator to date in this permit cycle. If a violation exists, the owner is notified within 30 days. Enforcement actions include educational site visits, outreach materials to improve awareness, correction notices, citations and special tax bills.

For the last row, the X marks in the status column appear at: Municipal Code row (X), a) (X), b) (X), c) (X), d) (X), e) (X).

Storm System Mapping	Continue to update GIS map with stormwater quality facilities (WQ BMPs), type, O&M files, approval dates, responsible party contacts, and maintenance activities (if MS4-owned)	Annually track stormwater quality facilities (WQ BMPs) on GIS map layers and through inspection records	Ongoing	Assistant Director of Engineering & Stormwater Manager			X	GIS mapping updated upon dedication/approval with facility type, approval dates, responsible party contacts, and maintenance activities (if MS4-owned). O&M covenants are stored in the development project file
Post-construction Runoff Control Training for MS4 inspectors and/or plan reviewers	Provide, or support access to, and track training once during the permit cycle at a minimum. Training shall explain the function of both structural and non-structural post-construction water quality BMPs. It may include green infrastructure, operations of proprietary BMPs, etc.	Track the staff attendance, topics and training provider/method used	Ongoing	Director of Engineering & Stormwater Manager			X	12 Inspectors and plan reviewers trained Topics Covered: WQ facility construction, construction & acceptance inspection procedures, troubleshooting common installation hurdles Training Provider/Method: Project site visits, In-office meetings and the St. Charles County Stormwater Seminar

2. Progress Towards Achieving the Statutory Goal of Reducing the Discharge of Pollutants to the Maximum Extent Practicable (MEP) to the MS4

As required by the permit, the City's Engineering Design Criteria address post-construction standards for water quality improvement for new and re-development. Stormwater quality facilities built to this standard are capturing and treating runoff from 90% of recorded daily rainfall events. This equates to treating more than 2.46M cubic feet of runoff from Wentzville MS4 to date. BMP operations & maintenance plans and agreements are in place for 100% of water quality BMPs prior to the City's final acceptance, improving long-term maintenance outcomes and pollution reduction potential. Additionally, a variety of tools are implemented to guide land use decisions for new development, protect sensitive areas, and address long-term stormwater runoff in the City of Wentzville. Natural physiographic features are evaluated and considered for protection through the City's Comprehensive Plan and Tree Preservation, Planned District, and Natural Watercourse Protection ordinances.

Continued implementation of the online Stormwater Quality Facility Inspection Portal and routine reminders help improve annual inspection submittals and awareness of maintenance responsibilities across sites. This was the first year that hand-off meetings were held with developers and responsible parties prior to the acceptance of water quality BMPs. The feedback received from these practices was very positive. The hand-off meetings are intended to clarify responsibilities, resolve confusion, answer questions, and address concerns regarding the long-term maintenance and inspection of these facilities.

Construction inspectors conduct oversight inspections of new developments during the installation and acceptance phases of post-construction BMPs. MS4 oversight inspections are also conducted 1-3 years after acceptance. In this permit cycle, the City has inspected 16% of accepted post-construction BMPs. GIS serves as the primary tracking mechanism for post-construction water quality facilities, and recent and upcoming updates to the GIS system will streamline oversight inspections and improve communication with property owners. While the BMPs listed above were implemented and effective, changes to several practices are desired to improve overall success and tracking. Practices are being implemented to better track BMP type, allow for easier inspection scheduling, and enhance the Stormwater Quality Facility Inspection Portal for customers.

The Stormwater Facility Lunch & Learn and Bus Tour was a well-attended event hosted by the City in 2024. This event featured presentations from St. Charles County and the City of Wentzville, focusing on their SWMP and post-construction BMP design criteria. The attendees then reviewed projects together to highlight design hurdles and opportunities for improvement. Many great takeaways and future discussion topics were outlined by stakeholders from this exercise. The event concluded with a bus tour of facilities in the City of Wentzville, some of which were part of the review exercises. Stakeholders engaged in meaningful discussions at these sites, and feedback reflected broad interest in this type of event. The City looks forward to collaborating again in this way in the future.

Supporting Programs, Initiatives and Materials:
1) Stormwater Facility Lunch & Learn and Bus Tour
2) Interpretive signage and outreach: Demonstration projects like Heartland Park and external outreach (Nonpoint Source Management Forum and River Soundings presentations) serve as a tool for stakeholders and reminders about the intent of BMPs such as forebays, bioretention, wetlands, and pervious pavement.
3) Stormwater Quality Facility Inspection Portal
4) Citywide Hydrologic Assessment: This project evaluated the effectiveness of Channel Protection Volume requirements in the EDC (to reduce erosive velocity in streams). It also modeled future 'built-out' development scenarios to identify locations where potential streambank erosion issues may occur. Findings helped evaluate Engineering Design Criteria.
5) HOA Symposium

3. Notice that the City is Relying on Another Government Entity to Satisfy Permit Obligations (if applicable)								
Name of Government Entity:	N/A		**Contact Info:**					
Primary Contact:			**Specific BMPs or MCMs Entity Implements:**					

4. Changes to the SWMP, BMPs or Measurable Goals and the Iterative Processes that Occurred

Iterative Process: Ordinances, Procedures and Enforcement
EVALUATE – Are procedures, agreements and ordinances ensure controls and strategies in place and maintained to prevent or minimize water quality impacts or incentivize planned growth? **YES**
EFFECTIVE – Y or N? If no, change procedures, agreements or ordinances based on types of controls ineffectively used or maintained. Re-evaluate. If yes, continue BMPs and strategies. **YES**
CHANGES – Are implementation procedures or BMPs updates required? **NO**

Were changes made and noted? **NO**

Iterative Process: Training and Outreach
EVALUATE – Are pollutants observed from concerns and inspections the same as those targeted by outreach and training? **YES**
EFFECTIVE – Y or N? If no, change pollution prevention outreach methods, targeted pollutants or audiences based on types of concerns received and inspection observations/results. Re-evaluate. If yes, keep BMPs and strategies that provide measurable achievements. **YES**
CHANGES – Are implementation procedures or BMPs updates required? **NO**

Were changes made and noted? **NO**

5. List of BMPs Evaluated and How BMPs were Determined Effective

Date of Review(s): 10/3/2024, 11/20/2024
Reviewer: Jamie Paige, Kelly Dunlap, William Reese, Construction Inspectors and Plan Reviewers

BMPs EVALUATED:
The City completed an annual review of the following (select all per 4.5.M):
   X Reviewing the number and types of developments;
   X How many BMPs were installed/inspected;
   X The amount of watershed area or water quality volume being treated;
   X The types of violations found and how frequently; and
   X How education could improve the effectiveness of the program.

The BMPs listed above continue to be evaluated for their effectiveness in post-construction stormwater management for new development and redevelopment projects. In 2024, the City received feedback from inspectors, property owners, HOAs, elected officials, and the Stormwater Advisory Committee. In addition to the common methods and stakeholders involved in reviewing MCM 5, the City hosted a Stormwater Facility Lunch & Learn and Bus Tour. This event provided stakeholders an opportunity to offer feedback on the existing City of Wentzville post-construction water quality BMP design criteria. Attendees included design engineers, installation and maintenance contractors, Wentzville residents, and other industry professionals. This event and the feedback received represent one of the initial steps in reviewing current standards. During the event, attendees voted on topics for review and provided comments on BMP types and design qualities that influence the lifespan and effectiveness of these measures.

City construction inspectors have provided valuable feedback regarding the inspection process for new post-construction BMPs. These will be reviewed and implemented in 2025. Generally, their feedback demonstrates a need for more in-depth training on certain types of BMPs, such as water quality ponds and bioretention facilities.

One continuous hurdle with this MCM is keeping current on contact information for property/BMP owners. New methods of communication were implemented in 2024, such as the handoff meetings and contact information request forms, but the City will continue to develop ways to collect this information. Existing opportunities such as HOA or business symposiums, marketing in City publications, and site visits will be utilized, as available in 2025. Additional methods of communication are being explored.

The 2024 SWMP audit findings were also reviewed as part of the iterative process for this MCM. Education and training are strong aspects of Wentzville's post-construction BMP program and will be leveraged to continue to improve this MCM's BMPs.

Minimum Control Measure #6: Pollution Prevention/Good Housekeeping for Municipal Operations

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

All measurable goals for the municipal operations component of the Stormwater Management Plan for 2021-2026 are completed or on track with annual accomplishments outlined below. The Operations and Maintenance (O&M) Manual is reviewed and updated annually by each department to reflect site conditions and municipal activities to adhere to permit requirements. Pollution Prevention training is an integral part of the City's municipal operations and continues to evolve with new facilities and adapt to seasonal activities.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete? Yes	No	On-track	Accomplishments
O&M Employee Training (i.e. staff who work with material handling, at MS4 owned or operated vehicle/equipment maintenance areas, storage yards, and material storage facilities).	Promote, or conduct and maintain and utilize an employee training program for MS4 municipal operations staff. Trainings are given at minimum annually, during new staff orientations or as needed in accordance with the O&M Program Manual.	Track and review the applicable staff, training topics, number of trainings promoted/conducted and number of participants.	Ongoing	O&M Program Responsible Party, Stormwater Manager			X	6 Trainings promoted/conducted 75 Participants Topics: O&M Plan and BMPs Spill Response Illicit Discharges SWPPPs
Operations & Maintenance (O&M) Program	Update and maintain the O&M Program and Manual. Include pollution prevention controls, inspection and staff training schedules, and tracking requirements implemented annually. The O&M Manual shall be present onsite/electronically with staff at facilities.	Track and review the applicable municipal operations, locations and BMPs that may have water quality impacts. Update program to reflect new facilities, operations, or BMPs as needed.	July 2022 and ongoing	Stormwater Manager & O&M Program Responsible Party			X	Responsible parties administer their O&M Program components and maintain BMPs at their locations. Staff completed an annual review to address new facilities, operation changes, materials used/stored, training seasonality, etc.
	Develop maps and descriptions of structural controls/BMPs to reduce or prevent the discharge of floatables and pollutants from entering waters		November 2022		X			Sites were reviewed to address new requirements for site map and BMP descriptions.
Municipal Facility Inspections & Maintenance	Perform inspection and maintenance activities at municipal facilities in accordance with the O&M Manual.	Track inspections, maintenance activities, and updates annually; keep on file through the permit cycle.	Ongoing	O&M Program Responsible Party, Stormwater Manager			X	28 Facility inspections conducted Corrective action/maintenance activities tracked
Flood Management Projects	Assess all new flood/stormwater projects for water quality impacts	Design criteria continue to be in place to assess all projects and recommend water quality protection practices/BMPs through Engineering plan review	Ongoing	Director of Engineering, Assistant Director of Engineering, Engineering Managers, Stormwater Manager			X	3 New flood management projects were reviewed for water quality standards as outlined in the EDC (602 E Pitman, 3874 Bedford Pointe, ARPA Downtown Stormwater Improvements Phases 1-3) 0 Projects required WQ BMPs 3 Projects are providing WQ benefits
Road Salt/Brine/Deicer Alternatives	Annually track usage of rock salt, brine or other street deicers or salt alternatives for street deicing pre-treatment with the goal of reducing use of traditional road salt.	Evaluate and track use of traditional road salt and alternatives	Ongoing	Superintendent Streets & Signals			X	Rock salt & brine pre-treatment alternatives tracked: 765 Tons of salt spread 5000 gallons of brine
Street Sweeping	Sweep main streets a minimum of twice yearly and a goal of twice monthly and subdivision streets quarterly, weather permitting	Track frequency of street sweeping operations, and estimated amount of debris removed	Ongoing	Superintendent Streets & Signals			X	Main streets frequency: Monthly Subdivision streets frequency: 5 Times per year 184 Tons of debris removed

2. Progress Towards Achieving the Statutory Goal of Reducing the Discharge of Pollutants to the Maximum Extent Practicable (MEP) to the MS4

The City's new Public Works facility opened in fall 2024, bringing improvements to all three recommendation areas that were noted in DNR's audit of the City's SWMP earlier that year. A summary of the audit comments follows:
1) Ensure vehicle washing with soaps, detergents, or additives is performed indoors and the wash water is directed to the sanitary sewer system.
2) Consider storing scrap metal and other waste materials indoors or under cover, if space allows.
3) Consider designing the new salt dome with space to load trucks indoors, to further reduce the risk of spills.

The new property and facility allow for covered storage of salt and other materials, an expanded area for vehicle maintenance, and a larger wash bay. There also is a stormwater pond (post-construction BMP facility) that treats stormwater runoff before it leaves the site. The original Public Works facility is still in use. This facility has a vehicle/equipment wash bay and a hydrodynamic separator to treat runoff from the three-acre yard and reduce debris and sediment before leaving the site. An additional review of the audit's MCM 6 recommendations can be found in Section 5. below.

Three stormwater projects to be constructed in 2025 will replace/add stormwater infrastructure as well as provide water quality benefits. The projects replace deteriorated metal pipes and provide stabilization for utilities on eroding streambanks.

Street maintenance activities include routine sweeping operations and salt brine road applications, rather than rock salt for pre-treatment when appropriate. Staff in various departments continue to rotate on a two- to three-year training schedule to help expose many employees to spill prevention and response training.

Supporting Programs, Initiatives and Materials:
1) Spill prevention and response training (8-hour course) offered
2) Train the Trainer Responsible Party Training
3) Template Training Agenda
4) Paycom Video Training Assignments

3. Notice that the City is Relying on Another Government Entity to Satisfy Permit Obligations (if applicable)

Name of Government Entity:	N/A	Contact Info:					
Primary Contact:		Specific BMPs or MCMs Entity Implements:					

4. Changes to the SWMP, BMPs or Measurable Goals and the Iterative Processes that Occurred

The O&M Program was reviewed with regards to the BMPs tracked above to evaluate their effectiveness and implementation.
EVALUATE – Were pollutants/results observed from concerns and inspection/maintenance logs the same as those targeted by procedures and training BMPs? **YES**
EFFECTIVE - Y or N? If no, change SOPs, schedules and/or training strategies based on types of concerns received and inspection observations/results to prevent or minimize water quality impacts. Re-evaluate. If yes, keep target pollutants, procedures and training. **YES**
CHANGES – Are implementation procedures or BMPs updates required? **NO**

Were changes made and noted?
YES. While there were no changes to the SWMP, BMPs or measurable goals, the Operations & Maintenance Plan was revised to address changes in facilities, operations, materials used/stored, training formats, applicable staff, site maps and BMPs.

5. List of BMPs Evaluated and How BMPs were Determined Effective

Date of Review(s): 2/7/2024, 8/28/2024
Reviewers: Jamie Paige, Kelly Dunlap, O&M Responsible Parties

BMPs EVALUATED:
The City evaluated all BMPs, implementation procedures, training, inspection/maintenance report observations, and feedback from the DNR SWMP audit, City employees and the public to assess the effectiveness of each BMP. MCM 6 and the City's O&M plan were evaluated by all departments in 2024 and will be updated in 2025. Updates include the addition of new municipal facilities and BMP map updates. 2024 brought updates to O&M training target audience and municipal facility operations, therefore increasing capacity to further reduce pollutants. An online training and tracking program through the City's employee portal is also planned to go live in 2025 to offer new avenues for training and improve tracking. The O&M Program and Employee Training were evaluated with insight and engagement during the "Train the Trainer" program. This provided suggestions to program and procedure updates in MCM 3-6 activities. The "Train the Trainer" approach opened the floor for internal discussion and topic review (i.e. City's SWMP, O&M updates, training and inspection requirements and opportunities.) These benefits will likely lead to implementing this approach again in the next permit cycle.
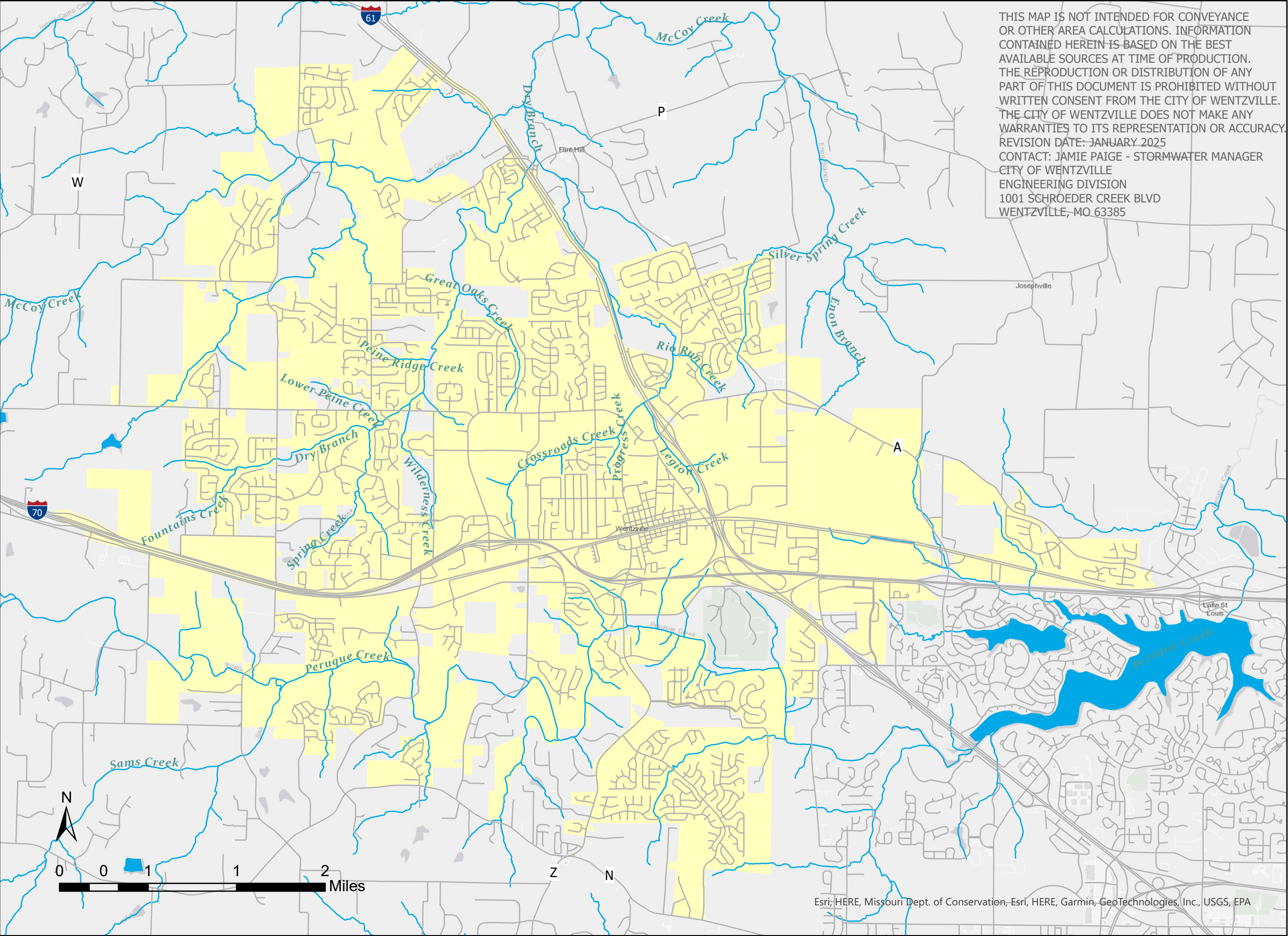
During the year-end review that occurs as part of this annual report process, MS4 operators realized some opportunities for seasonality and punctuality improvements to O&M training and facility inspections across City departments. While permit requirements were ultimately achieved, changes to the training inspection procedures and expectations are proposed to further improve the City's pollution prevention O&M plan. It is expected that the addition of online training will help in this area as well.

Additional updates to the O&M BMP maps will document where City employees rinse vehicles and equipment in the grass. Employees understand that they should primarily wash equipment in wash bays or where the wash water goes to the sanitary system. Occasionally, equipment and vehicles are rinsed, without soap, in grassy or rock areas where the runoff does not discharge pollution into a waterbody or a stormwater inlet.

City of Wentzville Municipal Boundary Map

Areas incorporated into Wentzville corporate limits
are shown on the attached map.

Municipal Boundary Map

January 2025

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REVISION DATE: JANUARY 2025
CONTACT: JAMIE PAIGE - STORMWATER MANAGER
CITY OF WENTZVILLE
ENGINEERING DIVISION
1001 SCHROEDER CREEK BLVD
WENTZVILLE, MO 63385

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0   0   1   1   2
Miles

McCoy Creek
Silver Spring Creek
Enon Branch
Josephville
Great Oaks Creek
Peine Ridge Creek
Rio Run Creek
Lower Peine Creek
Dry Branch
Crossroads Creek
Progress Creek
Legion Creek
Wilderness Creek
Fountains Creek
Spring Creek
Peruque Creek
Sams Creek
Wentzville
Lake St Louis
Brendon Creek
Flint Hill