Wentzville

Stormwater Management Program

2025 Annual Report

Municipal Separate Storm Sewer System

(MS4) Permit #MOR04C075

Reporting Period: January 1 to December 31, 2025

Submitted February 27, 2026

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

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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)

FOR OFFICE USE ONLY
PROJECT ID NUMBER
DATE RECEIVED

Part A – MS4 PERMIT HOLDER INFORMATION

1. MS4 NAME	2. NPDES PERMIT NUMBER	3. MS4 UNIQUE ID NO. (If applicable – co-permittees only)	
City of Wentzville	MOR04C075	N/A	
4. ADDRESS	**5. CITY**	**6. STATE**	**7. ZIP CODE**
1001 Schroeder Creek Blvd.	Wentzville	MO	63385
8. TELEPHONE NUMBER WITH AREA CODE	**9. NAME OF MS4 CONTACT PERSON**		
(636) 327-5102	Kelly Dunlap		

10. EMAIL OF MS4 CONTACT PERSON
kelly.dunlap@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, 2025 ENDING: December 31, 2025

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? 3/26/2025

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 **N/A**

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

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? 6/4, 9/3 11/6, 12/17 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.

*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

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

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

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:

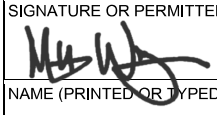
The facility must register in the Department's eDMR system through the Missouri Gateway for Environmental Management (MoGEM) before the first report is due. Registration and other information regarding MoGEM can be found at; MoGEM Splash Page. Information about the eDMR system can be found at eDMR Splash 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 25, 2026
NAME (PRINTED OR TYPED)	TITLE
Matt Wohlberg	Director of Engineering

MO 780-3009 (12-22)

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, 2025. This report is organized according to the requirements of the Missouri Department of Natural Resources (DNR) Stormwater Report Form MO 780-3009.

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 in this document are provided in Wentzville's Stormwater Management Plan, available at www.wentzvillemo.gov/stormwater.

Engineering Department employees participate in an on-site Post-Construction Water Quality Best Management Practice Inspection Training.

The City Stormwater Specialist leads a volunteer water quality data collection training for the Peruque Creek Watershed Alliance, where volunteers learned and collaborated to ensure the data collected is high-quality and consistent.

Volunteers participated in the annual litter cleanup event: Mission: Clean Stream.

Minimum Control Measure #2: Public Participation

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

All public participation tasks for 2025 were completed. The City of Wentzville engaged the public and key stakeholder groups through several Best Management Practices (BMPs) as outlined below. The 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, HOA trustees and businesses to help evaluate and improve the Stormwater Management Program (SWMP). Meetings include an overview of permit-related activities and provide opportunities for input and guidance on what is appropriate for the Wentzville community. The Concern Hotline and the City website continue to be useful tools to connect residents and stakeholders with staff when reporting pollution and stormwater quality-related topics.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete?			Accomplishments
					Yes	No	On-track	
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; 211 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: 3/26/2025 Method of Update: Public Meeting MS4 Representative: Matt Wohlberg

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

The accomplishments listed above demonstrate the successful implementation of BMPs/tasks to meet the measurable goals outlined in the City's SWMP to reduce pollutants to the MEP.

A Stormwater Committee Engagement Plan was proposed and adopted at the February meeting. This stemmed from committee member feedback in 2024 and the rapidly-developing and community-driven stormwater initiatives taking shape. This plan provided a structured approach, building on previous meetings, to facilitate more in-depth conversations about topics such as water quality monitoring, the Water Quality Facility Inspection Program, the draft Peruque Creek Watershed Nine-Element Plan and the draft TMDL for Peruque Creek. Committee members provided feedback on the structure of the Engagement Plan via a topic ranking questionnaire. These topics and resources were introduced to provide the committee with the framework to guide SWMP updates and the implementation of BMPs. Furthermore, this structured approach enabled the committee to provide input on the integration of regional stormwater quality initiatives directly into the City's SWMP.

Supporting Programs, Initiatives and Materials:

1) 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.
2) Litter Strategy and Partnerships: Including the Adopt-A-Spot program and business outreach via the Buzz newsletter and Code Compliance assistance communication

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): 2/10/2025, 3/12/2025, 10/26/2025, 11/12/2025

BMPs EVALUATED:
The elected BMPs and supporting programs, initiatives and materials listed above were evaluated and determined to be effective in actively engaging the public in the development and implementation of the Stormwater Management Program. This iterative review will guide the next MS4 permit cycle SWMP updates.

Achievements remain quantifiable and measurable goals meet permit requirements. The Stormwater Advisory Committee continues to provide valuable feedback and insight on many SWMP BMPs and water quality initiatives. The Concern Hotline remains an effective method to encourage citizens to connect to the City to report activities that may cause pollution. The SWMP and annual reports, for the current permit cycle, are posted on the City website year-round, and public notice periods and public meeting updates are scheduled in accordance with permit requirements.

The engagement plan was well-received by the committee and will influence 2026 initiatives.

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 stormwater infrastructure location, inspections and maintenance. Through dry weather field screenings, the City inspects permitted outfalls and other outfalls based on public concern to determine locations of illicit discharges. All outfalls are mapped in the GIS and updated each year. Staff continue to define, schedule and inspect MS4 permitted and priority outfalls. Training opportunities and flyers continue to educate staff and the public on ways to get involved in detecting and reporting the source of illicit discharges.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete?			Accomplishments
					Yes	No	On-track	
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	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		Ongoing				X	The mapped MS4 Outfalls are updated as developments and City projects are completed or dedicated and as existing map infrastructure is reviewed for accuracy. 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 2025 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 August 2026				X	60% MS4 outfalls cumulatively screened during the permit cycle 499 identified MS4 outfalls 107 MS4 outfall screened in 2025
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	6 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; 3 removed/resolved; 3 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**	95 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. 75 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 documented above demonstrate the City's efforts 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 Preventive Maintenance Program, staff continue to complete routine inspections and CCTV of aging infrastructure as well as pre-acceptance/dedication inspection of new infrastructure. These efforts aid in identifying priority repair areas and detecting sources of illicit discharges.

As noted above, public concerns were investigated and tracked to ensure the timely resolution of illicit discharges. Priority area screening enabled staff to identify outfalls with suspected discharges and trace them to their source. Furthermore, Pollution Prevention and O&M training ensures City employees can identify and report potential illicit discharges encountered during daily operations, both on and off City property.

GIS outfall reviews and dry weather screening inspections remain on track to meet permit goals. MS4 outfalls are continuously updated in GIS as new infrastructure is added and existing data is refined. The permit dictates that 60% of identified MS4 outfalls must be inspected as part of the dry weather field screening program. Per permit requirements, 60% of identified MS4 outfalls must undergo dry weather field screening; this goal was achieved by the end of 2025. Inspections will continue into 2026, focusing on priority outfalls and maintaining the 60% threshold through the end of the permit cycle.

Priority outfalls were identified and inspected, leading to two ongoing investigations to identify the source of dry weather flow. Current sampling suggests potential water main leaks in older infrastructure; these are being investigated in coordination with the City Water Division.

In collaboration with the Peruque Creek Watershed Alliance, the City expanded its stream monitoring program in 2025. 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 collaborates with local stakeholders to monitor 13 sites (six within Wentzville), quarterly as a goal, and review monitoring procedures. These efforts provide vital trend data while strengthening partnerships with local stakeholders. While data collection generally follows Stream Team procedures, the City and involved stakeholders enhance data quality and validity through laboratory analysis for Total Suspended Solids (TSS), E. coli and Total Phosphorus.

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 the Adopt-A-Spot program and the Wentzville Sustainability Partners program.
2) Alternative disposal opportunities that provide convenient disposal options for the public: The City's annual electronics recycling events, curbside yard waste and large item trash pickup days and St. Charles County's Household Hazardous Waste Collection Program
3)Stormwater Pollution Found door hangers
4) Peruque Creek Watershed Alliance and Peruque Creek water quality monitoring 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 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): 3/20/2025, 7/25/2025, 11/16/2025
Reviewers: Kelly Dunlap, Jamie Paige

BMPs EVALUATED:
All Illicit Discharge Detection and Elimination (IDDE) BMPs have been evaluated and determined to be effective. 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 land use concerns, infrastructure age, and recent IDDE investigation results.

The City utilizes a centralized, GIS-based asset inventory system to track and prioritize inspection workflows. While GIS data accuracy has increased significantly during this permit cycle, it remains a priority for further refinement in 2026. As the outfall and stormwater facility GIS layer data audit concludes, the City will transition to a "maintenance-level" review process. It is anticipated that the total number of permitted outfalls will be adjusted in the next permit cycle to reflect both new development and the additional refinement of existing data. Instances of unclear or inconsistent historical data are being reviewed and resolved to ensure outfalls are correctly identified.

The water quality monitoring program was expanded and reviewed for efficiency in 2025. Currently, the City monitors two stream locations in Wentzville on Peruque Creek in coordination with regional stakeholders. While these efforts are currently concentrated in the Peruque Creek watershed, the City is evaluating the feasibility of expanding the program to other local watersheds. This review will explore supporting volunteer efforts in other Wentzville watersheds and assess the need for supplemental data collection performed by MS4 staff. The ultimate goal of these efforts is to establish a robust, long-term trend tracking program for in-stream water quality indicators.

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, social media and at volunteer opportunities.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete?			Accomplishments
					Yes	No	On-track	
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	1,507 Visits tracked by 616 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 144 Inlets marked/updated in GIS 4,406 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	75 Articles and messages published or emailed to target audiences. Topics: recycling, yard waste, Mission: Clean Stream, volunteer litter cleanups, non-point source pollution and water quality BMPs
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	11 Educational meetings, seminars, or training events held, hosted or promoted 270 Attendees Planning meetings, training, and water quality monitoring events, Stormwater Advisory Committee meetings and St. Charles County Stormwater Seminar
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	2 Targeted Education Campaigns 22,500 households impacted by material distributed 31,000 social media followers tracked (updated for Facebook and Instagram only) 18,700 monthly utility bill and e-newsletter recipients 751 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	8.21 Miles of streams/roads cleaned 2,393 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	14 Speaker series held 627 Unique Attendees Materials distributed: Stream Water Quality Monitoring Topics covered: Water quality overview, non-point source pollution impacts to streams, land use and water quality BMP relationships
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: 159 Tons from street sweeping 2,040 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 a continued effort to focus on businesses in the commercial district. As part of this targeted litter prevention and maintenance education campaign, educational emails were sent to 751 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 about maintenance responsibilities, 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.

The student-focused outreach and education activities are also notable. In 2025, over 600 students, 15 educators, and 12 parents/guardians collected stream water quality data. This event paired Stream Team-trained monitors from General Motors, St. Charles County, St. Charles Soil and Water Conservation District and Peruque Creek Watershed Alliance with students to be mentors and guide them through learning about water quality. This program includes an Enviroscape demonstration, a stream water quality monitoring field trip and a community walkabout. These activities remain an important part of Wentzville education program and foster water quality stewardship in our community.

The City also supported and actively participated in education and outreach efforts through the Peruque Creek Watershed Alliance (PCWA). This includes coordinating 35 volunteers and nine organizations for Alliance meetings, committee meetings and water quality monitoring. In 2025, Wentzville and the PCWA facilitated community-based watershed education, volunteer monitoring, and stakeholder engagement activities that expanded public understanding of local water quality issues. Also in 2025, as part of these efforts, the City participated in feedback and collaborative opportunities for the draft 9-Element Watershed Plan and Total Maximum Daily Load documents. These efforts strengthened regional collaboration, increased volunteer capacity, and reinforced consistent water quality messaging to engage stakeholders within the watershed. Participation in PCWA initiatives enhanced the City's ability to deliver effective MCM 1 outreach while fostering stewardship of Peruque Creek.

Supporting Programs, Initiatives and Materials:
1) 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
2) Post-construction WQ BMP site visit and/or handoff meetings: 2 meetings held
3) Cityscapes 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 MCM 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?
YES. There were no changes made to the SWMP, BMPs or measurable goals. The materials, events and activities used for the targeted educational campaign were modified or updated.

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

Date of Review(s): 6/10/2025, 10/26/2025
Reviewers: Jamie Paige, Kelly Dunlap, Jeremy Hembree, Communication Department and Community Development Department.

BMPs EVALUATED:
Following a review of the 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 Compliance Division updated and sent mailers 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 Peruque Creek Watershed Alliance meetings and employee training. In 2026, the City website will be reviewed and updated for ADA compliance.

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, meet measurable goals or is under review and prioritization for 2026. The Engineering Design Criteria (EDC) provide standards for stormwater quality facilities, as well as operations and maintenance plans and guarantees. Water quality facility handoff meetings, oversight inspections, compliance assistance and the enforcement process support property owner compliance with operation and maintenance (O&M) programs. 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			15 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.

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** **X**	15 Pre-construction site plan reviews 10 Sites required water quality BMPs 16 WQF were reviewed 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**		**X** **X** **X** **X** **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) Oversight Inspections occur during the construction phase and are documented in final inspection reports and Stormwater Facility Construction Inspection Forms. b) Oversight 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. 2 Handoff meetings occurred in 2025 c) Oversight inspections are performed during the first three years after BMP acceptance. d) Recorded Maintenance Covenants require annual inspections. e) 20% 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.

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	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	5 Training hosted and promoted 64 Total Attendance Topics Covered: WQ facility construction, construction & acceptance inspection procedures, troubleshooting common installation hurdles Training Provider/Method: MS4 Operator/Project site visits, In-office meetings Other Training Opportunities: Provider/method: 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 City's Engineering Design Criteria (EDC) address post-construction standards for water quality improvement for new and redevelopment. Stormwater quality facilities built to this standard are capturing and treating runoff from 90% of recorded daily rainfall events. Collectively, Wentzville water quality facilities (WQF) are designed to treat 3.39M cubic feet of runoff. BMP operations & maintenance plans and agreements are in place 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 streamlines annual inspections and promotes awareness of maintenance responsibilities across sites. Handoff meetings are held with developers and property owner responsible parties prior to the acceptance of water quality BMPs. Feedback from these meetings confirmed that they effectively clarify maintenance expectations and long-term obligations. As an ongoing effort, property owner contact information is being updated and collected through various methods, including coordination with the Community Development Department, the Facility Inspection Portal, enforcement procedures, and a contact update request form. Staff provide property owners numerous outreach and education materials to aid in their maintenance efforts, including the Water Quality Facility (Basin) Maintenance Guide, WQF Handoff documents, the Stream Care Guide, the City Website and information published by regional and State agencies such as the Missouri Department of Conservation and the Missouri Botanical Garden

Construction inspectors conduct oversight inspections on developments, including during the installation and acceptance phases of post-construction BMPs. After acceptance, MS4 staff continue to inspect these facilities to achieve the 60% inspection goal for this permit cycle, as outlined in the SWMP. To achieve this and other MCM 5 BMPs, staff prioritize inspections on facilities that occur in the first three years after acceptance. In this permit cycle, the City has inspected 20% of accepted post-construction BMPs. GIS serves as the primary tracking mechanism for post-construction water quality facilities, and updates to the GIS system streamline oversight inspections and improve communication with property owners.

Training provided to inspectors who perform construction and acceptance inspections included targeted instruction on specific BMP types, such as bioretention and water quality ponds. This additional technical knowledge improves the inspector's ability to identify deficiencies and communicate requirements to developers and contractors. On-site training remains a priority for water quality facility (WQF) inspections. The Engineering Department was not the only City department to be trained. The Parks and Recreation Department received training on WQF BMP plan review and inspection procedures.

Supporting Programs, Initiatives and Materials:
1) Water Quality Facility (Basin) Maintenance Guide for property owners
2) Interpretive signage and outreach: Demonstration projects like Heartland Park and BMP workshops serve as a tool for stakeholders and reminders about the intent of BMPs such as forebays, bioretention, wetlands, and pervious pavement.
3) Water Quality Facility Property Owner 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 the Engineering Design Criteria.
5) GIS Stormwater Facility Layer Audit

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?
YES. SWMP BMPs remained the same; general procedures, such as the property owner inspection portal, inspection forms and other procedural aspects of this MCM, detailed below, were enhanced.

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

Date of Review(s): 3/18/2025, 6/10/2025, 9/25/2025
Reviewer: Kelly Dunlap, Jamie Paige, Jeremy Hembree, 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. In 2025, feedback was received from inspectors, plan reviewers, property owners, HOAs, elected officials and the Stormwater Advisory Committee. Many general procedural changes were implemented or updated in 2025, including:
- Property owner inspection forms in the Operations and Maintenance Plan documents
- The Property Owner Inspection Portal online map
- MS4 oversight enforcement tracking methods and GIS Dashboards
- Property owner annual inspection tracking
- The Stormwater Facility Construction Inspection Checklist
- Standard Operating Procedures (SOPs) to reflect the topics above

According to the City SWMP, the annual inspection requirement is fulfilled by the property owner's annual inspection. The owner inspection rate was notably low in 2025. This shortfall is directly linked to a lack of an effective method to keep and update current property owner contact information, which the City is enhancing through data collection methods mentioned previously. In addition to these efforts, the O&M Plans and covenants for each facility require annual inspections. These are designed to increase the number of property owner inspections and will remain a priority for staff in 2026. Handoff meetings are required prior to guarantee release and are a proactive approach to preventing a contact person's disconnect.

Plan review training will be updated in 2026 after some order of operation issues were experienced regarding maintenance covenants and O&M Plan approval and execution for WQFs. To prevent approved WQFs from moving forward without this documentation, the Plan Review process and inspection templates were revised to clarify requirements.

Due to the scope and interconnected nature of these updates, which span the entire lifecycle from plan review and acceptance to long-term oversight, a more comprehensive review of the process will take place in 2026.
Training methods were also reviewed and updated in 2025. City construction inspectors provided technical feedback regarding the inspection process for new post-construction BMPs, which was incorporated into 2025 procedures. Based on feedback from plan reviewers and the addition of new staff, more in-depth training is scheduled for 2026. Additionally, in 2025, WQF training was reintroduced to the Parks and Recreation Department. This training initiative will be expanded in 2026 to include more on-site training to cover more types of WQFs.

Minimum Control Measure #4: Construction Site Stormwater Runoff Control

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

The City of Wentzville performs construction runoff control procedures and oversight in accordance with the SWMP to meet permit conditions. Grading and improvement plans are reviewed for compliance with City codes, and Stormwater Pollution Prevention Plans (SWPPPs) are required for all sites greater than or equal to an acre. The City enforces SWPPP BMP requirements through site inspections and the Erosion and Sediment Control Ordinance, which includes sanctions per permit section 4.4.A. Additionally, Ord. 3634 requires lot deposits to cover the installation, maintenance and removal of BMPs during residential construction.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete?			Accomplishments
					Yes	No	On-track	
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	15 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: 1 Public (Capital) Projects 69 Private (Development) Projects 240 Private (New Residential Construction Permits) MS4 Oversight Inspections: 9 on Public (Capital) Projects 135 on Private Development 480 on Private Lots 880 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 18 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**	6 Training hosted and promoted 53 Total Attendance Topics covered: Plan review, inspection and enforcement procedures, and overview of MS4 permit, EDC and ordinance requirements and standard practices related to BMP selection, installation, inspection and/or maintenance. Training Provider/Method: MS4 Operators/In-person meetings (onsite and in office) Other training opportunities: Provider/method: Department construction meetings, One-on-One, Supervisor Check-Ins 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 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 comments and standard notes prior to permitting. Contractors are provided a fillable SWPPP inspection report to help meet permit obligations. This form is designed to allow the MS4 operator to track compliance trends and adjust oversight inspection frequency as needed. Pre-construction meetings serve as another opportunity for review with the grading/construction permittee or contractor.

In 2025, the Engineering Department launched internal SWPPP Logs and established a SWPPP Schedule Standard Detail for inclusion on plans to centralize requirements. This schedule improves communication between the inspector, City supervisors and the grading/construction permittee. Furthermore, the Construction staff SWPPP Check-In Template was created to guide and promote consistency, improve communication between the City inspector and their supervisor and maintain continuity as projects progress, enforcement is needed or when projects are reassigned.

In addition, inspectors visit their assigned active grading/construction sites to conduct SWPPP inspections, typically starting at rough grading, to ensure erosion and sediment controls are installed and maintained. Inspectors review submitted SWPPP reports for compliance. For new residential building permits, City inspectors check erosion control BMPs at residential footing inspections and review final stabilization and BMP removal at yard inspections. Regional SWPPP training opportunities for builders and contractors took place this year and the City employee training program was expanded to include the Community Development and Parks and Recreation Departments. The 24-hour online reporting tool, which utilizes the Concern Hotline system, allows residents to report potential illicit discharges from construction sites for prompt staff investigation.

Supporting Programs, Initiatives and Materials:
1) Stormwater Facility Construction Inspection Form
2) Stormwater and CCTV inspections for new construction
3) SWPPP Inspection Log
4) SWPPP Schedule Standard Detail
5) Construction SWPPP Check-In Template

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. SWMP BMPs remained the same; new department tools, such as the Construction SWPPP Check-In Template and the SWPPP schedule, were implemented.

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

Date of Review(s): 4/16/2025, 5/13/2025, 5/20/2025, 5/22/2025, 11/6/2025, 12/18/2025
Reviewers: Kelly Dunlap, Jamie Paige, Engineering Managers/Director, 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, procedures for inspection and enforcement, resources for plan review and training topics 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 concerns, common violations and enforcement strategies.

Training opportunities for construction inspectors are available on a one-on-one basis by request, in addition to the annual department group training. Both office- and field-based training are provided annually for the Engineering Department. This hybrid training opportunity is being extended to other departments that oversee or perform plan review or inspections for capital projects. For example, in 2025, 11 employees from Community Development and Parks & Recreation were trained in topics such as SWPPP resources, tools and procedures. Inspectors' training covered topics such as enforcement procedures, compliance assistance methods, SWPPP inspection frequency and on-site BMP installation and maintenance expectations in accordance with City ordinances. Trainings were well attended, and in-training engagement was high. Feedback from attendees will further improve training in 2026.

In the 2024 MS4 Annual Report, it was reported that opportunities had been identified for improvement in areas such as the MS4 operator SWPPP inspection procedures and employee training. As part of an iterative review, staff performed a group exercise evaluating pathways of communication involved with SWPPP procedures. This critical review of communication pathways, workflow processes and the effectiveness of message delivery yielded tools such as the SWPPP logs, schedule and the template SWPPP Check-in. While these tools were implemented in 2025, opportunities for review and improvement of these tools and procedures exist. Upon implementation of these tools, further training needs and procedural update needs were identified. Inspectors have also expressed uncertainty regarding determining on-site BMP effectiveness and when the City should require maintenance or BMP type review by the permittee. This iterative effort continues to evolve and influence MCM 4 BMPs.

The SWPPP log streamlines the time needed for review and reporting, while still keeping the needed details, to ensure sites remain in compliance with the MS4 permit, construction permits, ordinances and City standards. Inspectors were requested to use submitted SWPPPs more proactively in 2025. Annual report reviews and conversations conducted by MS4 staff indicated that this practice is not yet consistent across all projects. Focused training in 2026 will include how to identify when submitted SWPPP inspections do not reflect site conditions and clarify expectations for field inspectors regarding the review of permittee-submitted data. The SWPPP schedule, logs and Check-In Template were specifically designed to bridge this gap by providing the department’s baseline procedures in an engaging format. These tools were implemented partway through 2025, so 2026 will allow for a more complete review.

Capital improvement project SWPPP procedures, resources and outcomes will be reviewed through a collaborative iterative process in 2026.

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

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary
All BMPs for the municipal operations component of the SWMP are completed or meet the measurable goals as described in this section or are under review for updates in 2026. The Operations and Maintenance (O&M) Manual is reviewed and updated by each department to reflect site conditions and municipal activities to maintain compliance with permit requirements. Pollution Prevention training for municipal staff is updated annually to reflect new facilities and seasonal activities.

Status of Measurable Goals

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation Schedule	Individual(s) Responsible	Goal Complete?			Accomplishments
					Yes	No	On-track	
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 95 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. Develop maps and descriptions of structural controls/BMPs to reduce or prevent the discharge of floatables and pollutants from entering waters of the state or other MS4s where needed.	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 November 2022	Stormwater Manager & O&M Program Responsible Party	X		X	Responsible parties administer their O&M Program components and maintain BMPs at their locations. Updates address new facilities, operational changes, materials used/stored, training seasonality, etc. 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	23 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	0 New flood management projects were reviewed for water quality standards as outlined in the EDC 0 Projects required WQ BMPs 0 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: 675 Tons of salt spread 3600 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 159 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

Street maintenance activities include routine sweeping operations and salt brine road applications, rather than rock salt for pre-treatment when appropriate.

The City hosts an 8-hour spill prevention and response training annually and staff participate on a rotating two- to three-year schedule. Training to fulfill MCM 6 and the O&M Plan requirements continue, and expanded training opportunities have been introduced for topics such as plan review and inspection for MCMs 4 and 5. These trainings are now held for employees in the Community Development and Parks and Recreation Departments for the first time this permit year.

Representatives from each Division provide feedback and updates on the Pollution Prevention Operation and Maintenance (O&M) Plan. This plan outlines training requirements, vehicle and equipment practices, spill response protocols, City facilities, BMP locations and storage material locations, types and quantities.

Supporting Programs, Initiatives and Materials:
1) Spill prevention and response training (8-hour course) offered
2) Training supplemented with site visits
3) Template Training Agenda
4) Video Training Options

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 is being 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): 8/5/2025, 5/9/2025
Reviewers: Kelly Dunlap, Jamie Paige, O&M Responsible Parties

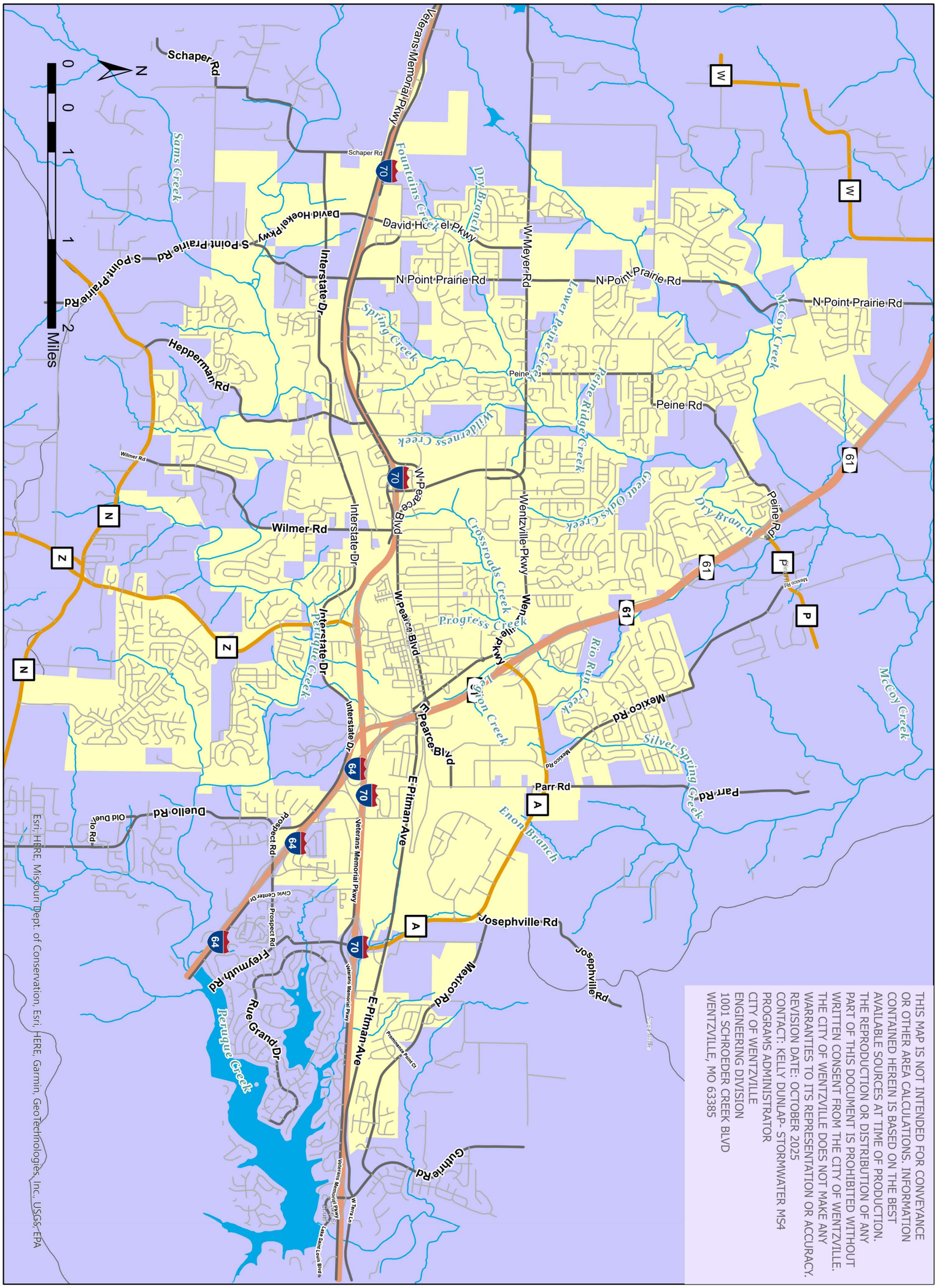
BMPs EVALUATED:
The City assesses BMP effectiveness through implementation procedures, training, inspection observations and feedback from employees and the Stormwater Advisory Committee. MCM 6 and the Pollution Prevention O&M Plan were evaluated by all departments in 2025. Several updates are scheduled for 2026, including the addition of new municipal facilities and updated BMP maps. The on-demand training program and assignment system through Paycom will assist supervisors and MS4 staff in tracking training completion and seasonal relevance. While in-person training remains an option, the online video system provides flexibility and ensures complete coverage across departments.

Facility inspections are primarily completed by on-site staff. One-on-one training is available upon request; additionally, an inspection guide has been proposed to ensure consistency. The effectiveness of a resource like this will be evaluated.

The O&M Plan updates in 2026 will include routine revisions, new facility data and clarified sections regarding on-site post-construction water quality BMPs. Defining specific responsibilities for the inspection and maintenance of these facilities will promote proactive maintenance and ensure annual property owner inspections are submitted (MCM 5).

City of Wentzville Municipal Boundary Map

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



THIS MAP IS NOT INTENDED FOR CONVEYANCE OR OTHER AREA CALCULATIONS. INFORMATION CONTAINED HEREIN IS BASED ON THE BEST AVAILABLE SOURCES AT TIME OF PRODUCTION. THE REPRODUCTION OR DISTRIBUTION OF ANY PART OF THIS DOCUMENT IS PROHIBITED WITHOUT WRITTEN CONSENT FROM THE CITY OF WENTZVILLE. THE CITY OF WENTZVILLE DOES NOT MAKE ANY WARRANTIES TO ITS REPRESENTATION OR ACCURACY.

REVISION DATE: OCTOBER 2025

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WENTZVILLE, MO 63385

Esri, HERE, Missouri Dept. of Conservation, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA

Wentzville Missouri®
The Crossroads of the Nation

Municipal Boundary Map

February 2026