

2023 Annual Report

Municipal Separate Storm Sewer System (MS4) Permit #MOR04C075

Reporting Period: January 1 to December 31, 2023

Submitted February 21, 2024





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

COMPREHENSIVE PERMIT (MORU	+0)		
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	l	
(636) 327-5102	Jamie Paige		
10. EMAIL OF MS4 CONTACT PERSON			
Jamie.Paige@wentzvillemo.gov			
11. Is the MS4 contact person listed above different from the mo ☐ Yes ☑ No	ost recent MS4 stormwater manaç	gement prograr	n annual report?
12. Have any areas of the MS4 been added or removed from the permit application (renewal, new, modification), or most recent № Yes □ No If Yes, please provide a map along with a brief description as an	MS4 stormwater management pro		
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 annual	lly. 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 perm	it)? ☐ Yes 🔽 No		
3. If you are part of a co-permitted MS4 permit, will each co-per combined MS4 stormwater management program report? In		stormwater ma	anagement program report, or a
4. Reporting period year (i.e., the previous year from January 1			
BEGINNING: January 1, 2023 ENDING: D	ecember 31, 2023		
Part C – STORMWATER MANAGEMENT PROGRAM PARTN	ERS		
 If another governmental entity implements any BMPs or MC Name of the government entity; Name of the primary contact for the government entity; Contact information (i.e., address, city, ZIP code, state Specific best management practices or minimum contributes. 	, and phone number); and		-
It is the responsibility of the permittee to provide all information being implemented by another governmental entity. If an explease indicated that under the appropriate MCM below.			
2. Does the permittee currently utilize, or is working towards dev If Yes, please provide a summary of the status of the Integrated		es 📝 No	N/A
PART D - MINIMUM CONTROL MEASURES, BEST MANAGE	EMENT PRACTICES, AND MEAS	SURABLE GO	ALS EVALUATION
An attachment is necessary for many items under the MCMs be goal of reducing the discharge of pollutants to the MS4 to the m success stories, and experiences that support the successful im	aximum extent practicable to the	MS4. Provide a	dditional informative data,
MCM 1. Public Education and Outreach			
1. (4.1.A) Who are the target audiences? Residents, developer. Were any changes made to target audiences during reporting p		nd local govern	ment employees

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 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. V/A
2. Was a public notice period held during reporting period? Yes No 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? No 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? No
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? <u>3/8/2023</u>
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 MO 780-3009 (12-22)

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
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 V 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 \sum No If No , please include an attachment describing why the procedures were not evaluated.
8. (4.4.K) Were all internal training procedures for MCM 4 evaluated for effectiveness during this reporting period? Yes No
If No , please include an attachment describing why the procedures were not evaluated.
9. (4.4.L) Were all procedures outlining the local inspection and enforcement for MCM 4 evaluated during this reporting period? ✓ Yes ☐ No
If No , please include an attachment describing why the document(s) were not evaluated.
10. Were the measurable goals for all programmatic BMPs for MCM 4 successfully reached? ✓ Yes ☐ No If No , were the measurable goals or programmatic BMPs evaluated/modified in an effort for success in the next reporting period? ☐ Yes ☐ No
For each of the programmatic BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.
11. (4.4.H, 4.4.I, 4.4.M) Were the programmatic BMPs and procedures for MCM 4 determined effective/successful for this reporting period? ✓ Yes □ No
12. Were any changes made to MCM 4 during the reporting period that were not covered above, including the addition of programmatic BMPs? ☐ Yes ✓ No
If Yes, please include an attachment describing changes.
MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment

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
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
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
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?
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 • Illicit Discharges; ☑ Yes ☐ No ☐ Not applicable
✓ 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			•						
during this reporting period? $\boxed{\prime}$ Yes $$ If No , please include an attachment des		ocedures were not evalu	ated and why.						
8. Were inspections conducted on these	facilities at minimum annuall	y? ☐ Yes 🔽 No							
9. Were the stormwater control measure ✓ Yes No	es and other programmatic BN	/IPs for 4.6.E determine	d effective/successful fo	r this reporting period?					
If No , were the BMPs, and procedures c ☐ Yes ☐ No	letermined to be ineffective/ur	nsuccessful evaluated fo	or modification or replace	ement?					
10. (4.6.G) Were procedures for proper reporting period? ✓ Yes □ No	•		nd areas of jurisdiction e	evaluated during this					
If No, please include an attachment des									
11. (4.6.H) Was washing of municipal vereporting period? ✓ Yes ☐ No	, ,			the permittee during this					
If Yes , were procedures for proper disposit No , please include an attachment des									
12. (4.6.I) Did the permittee maintain wri MS4 facilities during this reporting period If No, please include an attachment des	d? ☑ Yes 🗌 No			e Manual for all applicable					
13. Did the permittee evaluate the result are needed? This evaluation may also a MCM 1. ✓ Yes ☐ No If No , please include an attachment des	s, controls, and inspection proid in finding priority areas or p	ocedures to ensure com pollutants in relation to M	pliance with the permit a						
14. (4.6.J) Were any new flood manager If Yes, were procedures used to determine				lo					
15. Were the measurable goals for all B	MPs for MCM 6 successfully	reached? ✓ Yes	No	_					
If No, were the measurable goals evaluated For each of the BMPs under this MCN For any BMPs where the measurable	l, please provide a brief sur	mmary of how the mea	surable goals were acl						
effort for success in the coming repo			, 0						
16. (4.6.K, 4.6.L, 4.6.M) Were BMPs fo				No No N/A					
17. Were any changes made to MCM 6 If Yes , please include an attachment de		at were not covered abo	ve? 🗸 Yes 🗌 No						
Part E – MONITORING DATA WATER	SAMPLE(S) ANALYSIS								
Please include monitoring data collected	I 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									
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 Yes No If Yes, please describe.	a toward wate	er quality attainmen	it?		N/A
Part F - TOTAL MAXIMUM DAILY LOAD (TMDL) ASSUMPTIONS AN	ND REQUIRE	MENTS ATTAINN	IENT (ARAP)	PLAN	
1. Is your MS4 subject to an established or approved TMDL? Yes If No , please continue to Part G of this report.	✓ No				
2. Has the permittee submitted the TMDL ARAP to the Department for If No , please submit the annual status report providing a brief update o			☐ No TMDL ARAP	per 6.1.H of the pe	N/A rmit.
PART G – SUBMIT REPORT TO:					
The facility must register in the Department's eDMR system through the first report is due. Registration and other information regarding MoGEM system can be found at eDMR System . To access the eDMR system, contact edmr@dnr.mo.gov or of the system.	can be found em, use: <u>MoC</u>	l at, <u>MoGEM Splas</u> <u>GEM Login</u>	sh Page. Infor		
OPTIONAL QUESTIONS REGARDING MILITARY SERVICE					
Have you or an immediate family member ever served in the U.S. Armed Forces?		☐ Yes	V] No	
If yes, would you like information about military-related services in Missouri?		☐ Yes	V	☑ No	
PART H - CERTIFICATION					
I certify under penalty of law that this document and all attachments we system designed to assure that qualified personnel properly gather and or persons who manage the system, or those persons directly responsi of my knowledge and belief, true, accurate, and complete. I am aware t including the possibility of fine and imprisonment for knowing violations.	evaluate the ble for gather hat there are	information submiting the information	tted. Based or , the information	n my inquiry of the p on submitted is, to t	erson the best
SIGNATURE OR PERMITTEE (LEGALLY RESPONSIBLE PERSON)		DATE SIGNED			
Mysham		February 16, 202	24		
NAME (PRINTED OR TY) ED)		TITLE			
Mathew Wohlberg, P.E.		Director of Engine	eering		





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 2023 MS4 Permit Report summarizes accomplishments for the reporting period of January 1 through December 31, 2023. This report is organized according to requirements of the Missouri Department of Natural Resources (DNR) Stormwater Report Form MO 780-3009.

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

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



City employees participate in a stream cleanup after annual Spill Prevention & Operation and Maintenance training.



Engineering plan reviewers and construction inspectors collaborate during training. Field visits to post-construction water quality BMPs provide hands-on training and an opportunity for feedback and iterative review with staff.



An illicit discharge found and removed from a subdivision basin. Employees traced oil to a storm drain and educated homeowners about ways to prevent pollution.

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

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

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

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

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

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation		•	•	•	•			•		•											Individual(s)	Go	al Com	olete?	Accomplishments
rusk / DMF	Measurable Coat(s)	Tracking & Adaptive Management	Schedule	Responsible	Responsible	Yes	No	On-track	Accomplishments																			
Outreach and Education BMPs																												
Information on the MS4 Operator's website;	Maintain a web page with up to date information, & working links. All links shall be checked, and the page shall be updated as necessary at minimum annually. Must be maintained the entire year.		Ongoing Annual review by November 15	Stormwater Manager			x	961 Visits tracked by 378 Unique Users Activity peaks occurred in February and December																				
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			х	Standard detail used in EDC; all lids replaced in-house have "Dump No Waste, Drains to Stream" message 152 Inlets marked/updated in GIS 4,152 Total inlets marked "location of inlets are 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			х	30 Articles and messages published or emailed to target audiences. Topics: recycling, yard waste, Mission: Clean Stream and volunteer litter cleanups																				
Promote, host, or develop educational meetings, seminars, or trainings.	The events shall address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff. A minimum of two events shall be held, hosted or promoted annually. These events may address different pollutants/audiences.	Attendance and any distributed education materials shall be tracked. This shall be used to gauge interest in the topic. Consider using a questionnaire or follow-up survey to track if the attendees retained information or found the event beneficial.	Ongoing	Stormwater Manager			х	11 Educational meetings, seminars, or training events held, hosted or promoted 634 Attendees																				
Targeted education campaign (via mail, email or in-person)	Minimum of one annually OR with a specific event. (Examples: Sediment control with small building permit; leaf litter email during street sweeping season, or education brochure to all businesses conducting certain activity.)	Education material distributed, or amount of people contacted shall be tracked. Follow up on if noticeable behavior has changed.	Ongoing	Stormwater Manager			х	4 Targeted Education Campaigns 21,200 households impacted with material distributed 187,000 social media followers tracked 717 commercial entities received a letter addressing litter prevention and maintenance 596 commercial contacts received additional outreach materials																				

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;	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	х	11.4 Miles of streams/roads cleaned 2,871 Pounds of litter removed from streams and roads
Stormwater-related speaker series		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	х	3 Speaker series held 71 Attendees Materials distributed: Stream Care Guide, Water quality facility flyer, Stream Team data collection information Topics covered: Water quality BMP inspection and maintenance requirements and common hurdles, stream monitoring procedures and non-point source pollution impacts to streams
Ongoing yard waste collection, designated yard waste collection area, household hazardous waste collection, or street sweeping program.	Provide the service as an annual occurrence or at a readily accessible location. For street sweeping, this shall be conducted at minimum twice a year.	Track the amount collected. If educational information is being used in conjunction with this activity, track for changes due to the education. Tracking can be used with illicit discharge tracking, to determine if the rate of this type of discharges or dumping was reduced.	Ongoing	Director of Public Works	х	Ongoing yard waste collection and monthly/quarterly street sweeping services provided with the following material removed: 163 Tons from street sweeping 3,320 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 remained effective in meeting goals and targeting audiences. Educational materials such as the website, newsletter articles and social media posts were refreshed and updated as needed. Additional outreach materials were produced to address the ongoing litter concerns in the Wentzville community, especially in Crossroads Creek watershed, through an interdepartmental effort between the Stormwater Division, Code Compliance Division and the Parks and Recreation Department. Audiences targeted for litter outreach included those identified in the SWMP as well as businesses in the commercial district. As part of this litter prevention and maintenance education effort, educational letters were sent to 717 businesses. In addition, 596 entities received information on City programs such as litter cleanups like Mission: Clean Stream and Wentzville Sustainability Partners. These programs aim to create a network of support for local businesses and promote partnerships in our community to address litter concerns and promote other sustainability-minded practices.

Stormwater and Engineering staff also refined outreach and education on post-construction water quality BMPs:

- Inspectors who perform MS4 oversight inspections were provided additional training with the rollout of a checklist for construction and acceptance of water quality (WQ) facilities.
- Developers, builders and contractors have access to a similar checklist mentioned above for continuity through construction.
- Property owners/HOAs are introduced to their WQ facility through a new process that includes a site visit/handoff meeting with the developer/contractor prior to acceptance of the WQ facility. 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, setting property owners up for long-term success.
- HOAs receive information regarding WQ facilities at the HOA Symposium via presentation and one-on-one conversations.

This year the City also saw an increase in student education events. In the spring two teachers and 237 students collected stream water quality data. This event paired Stream Team trained monitors from General Motors and St. Charles County to be student mentors. A smaller event with one teacher and 13 students was also held where the Enviroscape model was used to demonstrate non-point source pollution and best management practices in our community. It culminated with a tour of their school's water quality BMPs. The timing of these activities was rescheduled from spring to fall for future school years, which means an additional 328 students also participated in a fall water pollution prevention education program in 2023. Overall, the program expanded back to (pre-COVID) involvement activities. This included an Enviroscape demonstration, a stream water quality monitoring field trip with General Motors and St. Charles County mentors, as well as a community walkabout to a local park. All activities are geared to look at the types and sources of water pollution in the community and best practices to help prevent pollution from impacting stream and lakes.

List of any additional programmatic BMPs:

- 1) Stream Team Stream Monitoring Level 1 Trainings (One targeted for residents and one for local MS4 managers and inspectors)
- 2) Wentzville Sustainability Partners Program
- 3) Utility bill inserts/door hangers/fact sheets: Stream Care Guides, "Pollution Found in Your Area" doorknockers and Mission: Clean Stream litter utility bill inserts were distributed
- 4) HOA Symposium
- 5) Post-construction WQ BMP site visit and/or handoff meetings: 11 meetings held

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

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

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

The Public Education and Outreach on Stormwater Impacts Program was reviewed with regards to the BMPs tracked above to evaluate their effectiveness and implementation.

EVALUATE – Do the listed education/outreach BMPs target specific audiences and pollutants likely to have significant stormwater impacts? Do the listed BMPs target pollutants that were observed at illicit discharge concerns or inspections? YES

EFFECTIVE – Y or N? If no, change the target pollutants or audiences or change how the BMPs are administered to better address the observed pollutants or illicit discharges. Re-evaluate. If yes, keep target pollutants and audiences the same. YES

CHANGES – Are implementation procedures or BMPs updates required? NO

Were changes made and noted?

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

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

Date of Review(s): 2/14/2023, 2/23/2023, 3/1/2023, 11/17/2023

Reviewers: Jamie Paige, Kelly Dunlap

BMPs EVALUATED:

After reviewing all BMPs for the public outreach and involvement component of the Stormwater Management Plan for 2021-2026, staff determined that target audiences and pollutants are addressed by at least one of the BMPs listed and BMP implementation is 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 such as training/education events, educational materials, and programs such as Mission: Clean Stream. Building Code Enforcement and Parks shared observations and updated handouts to use at concerns as an educational tool prior to sending violation notices. Problematic areas are considered for future cleanup events. This feedback continues to be reviewed and considered for implementation in 2024, including website updates to improve navigation and a revised water quality facility guide.

Minimum Control Measure #2: Public Participation

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

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

Status of Measurable Goals

Table / PMP	Managemble Cool(a)	Totalina O Adambina Managamant	Implementation	Individual(s)	Go	al Comp	olete?	A
Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Schedule	Responsible	Yes	No	On-track	Accomplishments
SWMP Public Notice Period	30-day minimum public notice period for the draft permit and description of the SWMP which includes posting the SWMP online and providing a way for the public to submit comments	, '	Jan. 2021 Jan. 2026	Stormwater Manager	х			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	х			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			х	Concern Hotline advertised on website and in articles; 114 Stormwater and pollution concerns tracked 'location of concerns are tracked in 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			х	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			х	Date of Update: 3/8/2023 Method of Update: Public Meeting MS4 Representative: Jamie Paige

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

Opportunities for public involvement in development of the SWMP and accomplishments listed above demonstrate the successful implementation of BMPs/tasks to meet the measurable goals designed to reduce pollutants to the MEP. The City of Wentzville implements a variety of activities to engage the public and key stakeholder groups and organizations to become involved in various pollution prevention BMPs. Direct feedback from residents concerned about litter in the commercial Wentzville Parkway corridor prompted, strengthened and continued collaboration with the local businesses, the Community Development Department, Communications and Community Relations, and the Parks and Recreation Department.

List of additional events and/or programmatic BMPs:

- 1) Mission: Clean Stream: Volunteer surveys provide public feedback after the event about the type and location of pollutants found and effectiveness of BMPs
- 2) Litter Strategy and Partnerships: Wentzville Sustainability Partners

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: 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): 11/16/2023

Reviewers: Jamie Paige and Kelly Dunlap

BMPs EVALUATED:

The elected and optional BMPs listed above as "on track" were evaluated and determined to be effective in actively engaging the public in development and implementation of the Stormwater Management Program. Achievements remain quantifiable and measurable goals meet new permit requirements. The Stormwater Advisory Committee public meetings offered a review of the comprehensive permit, MCMs and SWMP to evaluate and improve program effectiveness. The committee provided valuable feedback on many of the MCMs in 2023, including the post-construction BMP program and public outreach and education activities and events. The Concern Hotline remains an effective method to encourage citizens to connect to the City to report activities that may cause pollution.

Minimum Control Measure #3: Illicit Discharge Detection and Elimination

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

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

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation	Individual(s)	Go	al Com	olete?	Accomplishments
Task / DMF	Measurable Goal(s)	Tracking & Adaptive Management	Schedule	Responsible	Yes	No	On-track	Accomptistiments
Storm System Mapping	Continue to update GIS map with stormwater outfalls, receiving waters and MS4 boundary.	Track the numbering/naming system of all outfalls; dates locations were verified and/or last field surveyed; and for newly added outfalls, the date added to the storm sewer system	Ongoing	Assistant Director of Engineering & Stormwater Manager			х	Outfalls, receiving waters and updated municipal boundary are mapped.
	Map MS4 outfalls per new definition in accordance with 4.3.0		November 2025				х	Mapped outfall details continue to be refined to delineate MS4 outfalls based on the new permit definition and subsequent clarifications from the permitting authority. MS4 outfalls are inspected as part of the dry weather outfall screening program.
Dry Weather Field Screening Strategy	Screen priority areas, such as those listed in 4.3.H, each year.	Prioritize and track MS4 outfalls screened based on priority areas (i.e. areas with ongoing or a history of illicit discharges, known litter/dumping issues, or increased citizen complaints). Priority areas may be revised as needed based on findings/concern resolution.	Annually by November 15	Stormwater Manager			х	Priority areas identified for 2023 consisted of outfalls in high-density commercial areas and older residential neighborhoods, including outfalls of drainage areas of previous concerns.
	Screen a minimum of 60% of all MS4 outfalls during the permit cycle.	Track the number of MS4 outfalls screened; annually review pollutants discharged, locations and the effectiveness of outreach and enforcement to determine what modifications may be needed.	Ongoing through March 2026				х	164 Outfalls cumulatively screened during permit cycle
Stormwater Pollution Control Ordinance	Maintain one ordinance(s) with provision for enforcement to prohibit non-stormwater discharges to the MS4	Regulatory mechanism with sanctions for enforcement continues to be in place and updated as needed to reflect new permit conditions	Ongoing	Stormwater Manager	х			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			х	10 Illicit discharge concerns tracked
	Document all concerns and locations and removals of illicit discharges		Ongoing				х	All illicit discharge concerns are documented on the IDDE Tracking Form (10 found; 5 removed; 5 ongoing)
	Combine the written procedures listed in SWMP MCM 3 into an Illicit Discharge SOP		March 2025				х	IDDE SOP drafted

IDDE Training Program	MCM 6, and within one year of being hired. Topics will target staff that routinely come into contact with materials which may become, or	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	х	107 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 received Missouri Stream Team chemical data collection training
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	х	Outreach methods used: The City website features ways to identify pollution, alternative disposal methods and a 24-hour reporting form. 30 Articles published on the website and in newsletters covering recycling, yard waste and litter pickup. City employee trainings are required as part as the O&M Program.

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

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

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

In coordination with MCM 1 and 6, a litter boom was installed in a tributary of Heartland Park lake. The goal of using this device was to help address litter flowing from dense commercial areas. The device was not as successful as planned due to several factors. A new anchoring method and location are being evaluated to more effectively target litter getting into the lake. The City employs other BMPs in this watershed to address the litter such as the Adopt-A-Spot program, partnerships with local businesses, and interdepartmental outreach and education and code enforcement efforts.

List of any additional programmatic BMPs (e.g. mapping of the entire storm sewer system, adopting a standard operating procedure for dry weather screening, etc.)

- 1) Stormwater Pollution Prevention Outreach: MS4 staff, Code Compliance, the Employee Green Team, Economic Development and Parks have partnered to educate and incentivize business owners and customers to reduce litter in waterways and parks using #HelpHeartland and the Wentzville Sustainability Partners program.
- 2) Alternative disposal opportunities: The City's annual electronics recycling events, as well as curbside yard waste and large item trash pickup days and the Household Hazardous Waste Collection Program provide convenient disposal options for the public.
- 3) Adopt-A-Spot program

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

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

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

The 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?

YES. The implementation schedule was updated from November 2023 to November 2025 for the Storm System Mapping BMP and measurable goal to "Map MS4 outfalls per new definition in accordance with 4.3.0." This change was made to reflect work to delineate MS4 outfalls based on the new permit definition and subsequent clarifications from the permitting authority. While outfalls are mapped and continuously updated, the review of each outfall to determine if it qualifies as a MS4 outfall is ongoing. Priority area outfalls that align with criteria as outlined in SWMP section 4.3.H were the first to be reviewed and inspected. Priority areas continue to be reviewed and updated for inspection each year.

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

Date of Review(s): 1/12/2023, 3/9/2023, 6/19/2023, 9/24/2023

Reviewers: Jamie Paige and Kelly Dunlap

BMPs EVALUATED:

All Illicit Discharge Detection and Elimination BMPs have been evaluated and determined to be effective using the iterative process above. The Stormwater Pollution Control Ordinance was deemed appropriate and continues to be used for enforcement procedures. During dry weather field screenings, priority areas were reviewed and updated based on concerns and IDDE investigations and screenings. Having a centralized GIS-based asset inventory system supports tracking, prioritization and inspection workflows. As outfalls were reviewed in spacial groups under the MS4 permit definition, inspections were scheduled to fulfill the measurable goal for the dry weather field screening. The centralized tracking system for incidents, investigations and enforcement meets permit and city needs. In addition to dry weather screenings, condition assessments provide opportunities to target outreach efforts to reduce potential discharges. Outreach and training effectiveness was reviewed and determined that no updates or enhancements were needed to improve reaching target audiences and outreach messages. However, additional training opportunities will allow for further staff involvement in the IDDE program.

Minimum Control Measure #4: Construction Site Stormwater Runoff Control

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

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

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation	Individual(s)	Go	al Com	plete?	Accomplishments
Task / DIMP	Measurable Goat(s)	Tracking & Adaptive Management	Schedule	Responsible	Yes	No	On-track	Accomptistiments
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	х			Municipal Code Chapters 515 and 410 (Ord. #3146 and #3634) continu- 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			х	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			х	Municipal Code Chapter 515 authorizes inspection, enforcement and SWPPP submittal requirements of land disturbance projects > 20,00 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				х	Active projects are tracked electronically in a centralized folder 5 Public (Capital) Projects 54 Private (Development) Projects 278 Private (New Residential Construction Permits)
								MS4 Oversight Inspections: 101 on Public (Capital) Projects 64 on Private Development 556 on Private Lots 628 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.					х	Customer Service Center advertised through website and articles 30 Stormwater concerns tracked

needed	Stormwater Manager		Topics covered: MS4 permit inspection requirements, proper BMP selection, installation, inspection and/or maintenance. Training Provider/Method: MS4 Stormwater Manager and Senior Civil Engineer/ In-person meetings Inspectors and plan reviewers also learn about installation, maintenance, and responding to concerns with supervisor and/or Stormwater Manager oversight. Provider/method: Department construction meetings and St. Charles County Stormwater Seminar
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2. PROGRESS TOWARDS ACHIEVING THE STATUTORY GOAL OF REDUCING THE DISCHARGE OF POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE (MEP) TO THE MS4

The BMPs/task progress and accomplishments listed above demonstrate reducing the discharge of pollutants to the MEP. Standard procedures for plan review include city staff evaluating land disturbances and pollution prevention strategies through pre-construction site plan review and comment prior to permitting. At project pre-construction meetings, contractors are provided a fillable SWPPP inspection report to help meet permit obligations, and sediment/erosion control BMPs and requirements are reviewed. In addition, inspectors visit their assigned active grading sites weekly at a minimum and typically conduct SWPPP inspections at rough grading to ensure erosion and sediment controls are installed. Inspectors review SWPPP reports for compliance and inspection prioritization if reports are not received. Erosion control checks at residential footing inspections and review of construction site runoff controls at final yard inspections were completed for 278 new residential building permits. Several SWPPP training opportunities for builders, contractors and staff inspectors resumed this year, including a training hosted by St. Charles County attended by plan reviewers and construction inspectors. The 24-hour online reporting tool remains instrumental for citizens to report issues to help reduce the discharge of pollutants.

List of additional programmatic BMPs added to the SWMP (i.e. including onsite pre-construction visits, adopting a standard operating procedure for enforcement measures, etc.) 1) Stormwater Facility Construction Inspection Form

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. YES

CHANGES - Are implementation procedures or BMPs updates required? NO

Were changes made and noted?

NO. There are no proposed changes to the SWMP, BMPs or measurable goals at this time.

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

Date of Review(s): 1/23/2023, 3/9/2023, 4/13/2023, 5/11/2023, 8/21/2023, 9/19/2023 Reviewers: Jamie Paige, Kelly Dunlap, 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.

BMPs EVALUATED: Ordinance, inspection/enforcement procedures, pre-construction site plan reviews and inspector training

These are indicated by "X" in the list above. Sediment and erosion control and related ordinances were reviewed for effectiveness based on customer concerns, common violations and enforcement strategies used. Education was implemented at staff development meetings to inform inspectors about concrete washouts, SWPPP inspection frequency and procedures to help reduce violations. During these check-in meetings and iterative process review, construction site inspection and enforcement procedures, tracking methods and metrics were reviewed. Development Inspection and Development SOPs, site BMPs, checklists and workflows were evaluated and refined. Evaluation of pre-construction site plan reviews and training feedback from MS4 inspectors and plan reviewers continue to be important tools that confirm whether SWMP BMPs are appropriate and successful in achieving goals. BMPs were determined to be effective through the iterative process outlined above. However, additional resources and training tailored to site plan review and SWPPP plans were deemed beneficial and requested to help with BMP installation and maintenance schedules. This continues to be a work in progress. Recommendations for inspection and reporting consistency were also incorporated into training.

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

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summary

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

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation	Individual(s)	Go	al Com	plete?	Accomplishments
Task / DIMF	measurable Goal(s)	Tracking & Adaptive Management	Schedule	Responsible	Yes	No	On-track	Accomptishments
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	х			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	х			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 inten 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.	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		х	15 Pre-construction site plan reviews 7 Sites required water quality BMPs
	Evaluate non-structural BMP selection first using tools such as comprehensive plans, zoning ordinances, buffer strips and/or maximization/preservation of open space.					х	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		х	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:	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	Adopt changes by 11/2/2023	Engineering Manager & Stormwater Manager	Х		Municipal Code and Maintenance Covenants authorize inspection and enforcement. Development Inspection SOP requires BMP construction inspection.
	a) 1 or more during construction	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	Ongoing			х	a) Inspections occur during the construction phase and are documented in final inspection reports and Stormwater Facility Construction Inspection Forms.
	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)	need				х	b) Inspections including review of material submittals and/or as-builts occur prior to BMP acceptance. Site handoff meetings are hosted with property owners to improve awareness of water quality BMP requirements.
	c) 1 or more during the first three years after installation by the MS4 Operator					х	c) Oversight inspections are performed during the first three years after BMP acceptance.
	d) Annually by the BMP owner/operator or by the MS4 Operator					х	d) Recorded Maintenance Covenants require annual inspections.
	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					Х	e) 22% of water quality BMPs have been inspected by the MS4 operator to date in this permit cycle.
	Begin enforcement action within 30 days of discovering a violation (i.e. verbal, education, notices, fines etc.)					х	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	Assistant Director of Engineering & Stormwater Manager		Х	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		х	15 Inspectors and plan reviewers trained Topics Covered: WQ facility construction, flow chart, a new inspection checklist for reporting and maintenance inspection procedures Training Provider/Method: Project site visits, department construction meetings, and the St. Charles County Stormwater Seminar

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

The achievements above demonstrate the successful implementation of the BMPs/tasks designed to reduce pollutants to the MEP. As required by the permit, the City's Engineering Design Criteria address post-construction standards for water quality improvement for new and re-development. Stormwater quality facilities built to this standard are capturing and treating runoff from 90% of recorded daily rainfall events. This equates to treating more than 2.46M cubic feet of runoff from Wentzville's MS4 to date. BMP operations & maintenance plans and agreements are in place for 100% of water quality BMPs prior to the City's final acceptance, improving long-term maintenance outcomes and pollution reduction potential.

Continued implementation of the online Stormwater Quality Facility Inspection Portal and routine reminders help improve annual inspection submittals and awareness of maintenance responsibilities across sites. Additional practices were implemented this year after receiving feedback from MS4 oversight inspectors and the Stormwater Advisory Committee. Iterative processes have enhanced the construction inspection and acceptance requirements for post-construction water quality BMPs in the form of updated SOPs and a Stormwater Facility Construction Inspection Form. In addition, MS4 staff now conducts a hand-off meeting with the developer and owner or party responsible for maintenance prior to the acceptance of water quality BMPs. This meeting is intended to clarify responsibilities, resolve confusion, answer questions, and addresses concerns regarding the long-term maintenance and inspection of these facilities. MS4 oversight inspections are performed to reach the 60% inspection goal.

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.

List of any additional programmatic BMPs and procedures:

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

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. NO

CHANGES - Are implementation procedures or BMPs updates required? YES

Were changes made and noted?

YES. While the BMPs listed above were implemented and effective, changes to several practices were needed and desired to continue to improve overall success and tracking. This included 1) producing a more consistent construction inspection checklist, 2) requiring site hand-off meetings with staff, developer and owner to improve understanding of water quality BMP requirements and 3) adopting MS4 permit enforcement timeframes to achieve notification requirements. A review of the City's GIS WQ facility map layer also found minor discrepancies in how WQ facilities were tracked in previous years. To align with measurable goals, updates to practices are being implemented to better track BMP type, allow for easier inspection scheduling, and to enhance the Stormwater Quality Facility Inspection Portal for customers.

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. While the SWMP, BMPs and measurable goals listed above were implemented and effective, procedural changes were made to improve overall success. This included 1) training staff on procedures to host site handoff meetings with the developer and owner prior to acceptance, 2) creating plan review and inspection resources that outline best practices, planting windows etc., and 2) creating HOA Hand-off meeting materials to facilitate education and the transfer of responsibility.

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

Date of Review(s): 3/9/2023, 5/11/2023, 07/27/2023, 07/31/2023, 08/3/2023, 8/22/2023, 8/30/2023, 9/1/2023, 9/19/2023

Reviewer: Jamie Paige, Kelly Dunlap, William Reese, Construction Inspectors and Plan Reviewers

BMPs EVALUATED:

The City completed an annual review of the following (select all per 4.5.M):

- X Reviewing the number and types of developments;
- X How many BMPs were installed/inspected;
- X The amount of watershed area or water quality volume being treated;
- X The types of violations found and how frequently; and
- X How education could improve the effectiveness of the program.

The BMPs listed above continue to be evaluated for effectiveness in post-construction stormwater management for new development and redevelopment. Quantitative indicators include 100% review of stormwater quality facility inspection reports and site plan reviews conducted on 100% of all proposed developments. Feedback from inspectors, property owners, HOAs, elected officials and the Stormwater Advisory Committee resulted in several updates for this MCM such as the site/handoff meeting process and outreach provided. Feedback from inspectors, developers and BMP installers led to creation of the checklist mentioned in section 2 above. In addition, educational materials were reviewed. New handouts/factsheets were created, such as training and hand-off meeting materials. In 2024 other updates to the public inspection portal and BMP inspection forms are planned. Strategies will continue to evolve based on comments received from the changes implemented in an effort to create a program that is supportive and effective.

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

1. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS

Summar

All measurable goals for the municipal operations component of the Stormwater Management Plan for 2021–2026 are completed or on track with annual accomplishments outlined below. The Operations and Maintenance (O&M) Manual was updated to reflect new permit conditions. Each department reviewed the plan updates are in process.

Task / BMP	Measurable Goal(s)	Tracking & Adaptive Management	Implementation	Individual(s)	Go	al Com	olete?	Accomplishments
Task / DMF	measurable doal(s)	Tracking & Adaptive Management	Schedule	Responsible	Yes	No	On-track	Accomptistiments
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			х	7 Trainings promoted/conducted 107 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	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		х	Responsible parties continue to administer their piece of the O&M Program and maintain O&M BMPs at their location. Staff completed an annual review to address new facilities, changes in operations, materials used/stored, training seasonality, etc. Sites were reviewed to address new requirements for site map and BMP descriptions.
	of the state or other MS4s where needed.							'
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			х	19 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		Director of Engineering, Assistant Director of Engineering, Engineering Managers, Stormwater Manager			х	New flood management projects were reviewed for water quality standards as outlined in the EDC 3 Projects reviewed (Victoria Park, 602 E Pitman, 3874 Bedford Pointe) 0 Projects required water quality BMPs

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		Rock salt & brine pre-treatment alternatives tracked: 57 Tons of salt spread No brine was sprayed in 2023 due to the lack of snow events
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		Main streets frequency: Monthly Subdivision streets frequency: 5 Times per year 163 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. Staff in various departments continue to rotate on a two- to three-year training schedule to help expose many employees to spill prevention and response training. At the Public Works facility, the use of a vehicle/equipment wash bay and hydrodynamic separator treats runoff from the three-acre yard and reduces debris and sediment before leaving the site. Public concerns from the City's Concern Hotline are tracked on the City's centralized concern system. Flood/stormwater projects reviewed were replacements of existing stormwater infrastructure, with no additional water quality requirements per the City's design standards. The City's O&M plan was evaluated by all departments. Updates include the addition of municipal facility BMP maps and expanding the MCM 6 training program to cover training topics and applicable staff as requirements of the target audience and municipal facility operations, therefore increasing capacity to further reduce pollutants. MS4 staff are exploring opportunities for an online training and tracking program through the City's employee portal, as well as a "train the trainer" program for departments to discuss and better understand the SWMP and O&M updates, training expectations, learning opportunities and inspection requirements.

List of any additional programmatic BMPs added to the SWMP (i.e. programmatic BMPs include new training program, adopting a standard operating procedure for equipment cleaning, etc.)

1) Spill prevention and response training (8-hour course) offered

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. NO

CHANGES - Are implementation procedures or BMPs updates required? YES

Were changes made and noted?

YES. While there were no changes to the SWMP, BMPs or measurable goals, the Operations & Maintenance Plan was revised to address new facilities, operations, materials used/stored, training seasonality, target audience, applicable staff, site maps and BMPs as planned above.

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

Date of Review(s): 3/9/2023, 6/19/2023, 10/31/2023, 12/7/2023 Reviewers: Jamie Paige, Kelly Dunlap, O&M Responsible Parties

BMPs EVALUATED:

All BMPs, implementation procedures, training, observations from inspection/maintenance reports, and feedback from staff and the public were evaluated to assess the effectiveness of the each BMP. Input was received through many channels such as training seminars, inspection forms and from each responsible party's reviews of the O&M Manual, etc. Feedback from these training events was positive. Street sweeping and flood management project plan review continue to work effectively.

Prior to O&M Plan changes, review of staff training showed that some training was not tracked, did not consider seasonality in scheduling, or did not include all staff that are now deemed applicable. Review of inspection and maintenance procedures highlighted where municipal facility and post-construction BMPs (MCM 5) inspections should occur. Revisions made to the O&M Manual and facility maps address new facilities to be inspected and new departments to be included in training. In 2024, additional resources and opportunities are planned to assist and support City's departments in providing training and inspections. Some possible opportunities include adding O&M and pollution prevention training videos to the online employee portal and a "train the trainer" seminar to deepen understanding of permit changes for the O&M responsible parties.



City of Wentzville Municipal Boundary Map

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



