

## KANSAS STORMWATER 2019 ANNUAL REPORT FORM FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

Please place an "X" in the left box if any information has changed from previous years.

<input type="checkbox"/>	Permittee:	City of Overland Park
<input type="checkbox"/>	Mailing Address:	8500 Santa Fe Drive
<input type="checkbox"/>	Municipality:	Overland Park
<input type="checkbox"/>	State:	Kansas
<input type="checkbox"/>	Zip Code:	66212
<input type="checkbox"/>	MS4 Program and Construction Contact:	Lorraine Basalo, City Engineer
<input type="checkbox"/>	Email:	lorraine.basalo@opkansas.org
<input type="checkbox"/>	Phone Number:	913-895-6023
<input type="checkbox"/>	Permit Number:	M-MO28-SU01 (NPDES# - KS410026)

Reporting period covers activities from January 1, 2019 through December 31, 2019.

This annual report must be submitted to the Kansas Department of Health and Environment (KDHE) by February 28th, 2019. The annual report is to be submitted as PDF files to KDHE preferably on a standard compact disk (CD) or digital versatile disk (DVD). If the permittee does not have the ability to provide the files in a CD or DVD, a flash drive can be submitted. Some permittees provide additional hard copy submissions of the annual report or supplemental documents along with the electronic files. There is no requirement to provide hard copies of any documents other than a simple transmittal letter.

**IN ADDITION**, provide the following:

1. A current copy of the Stormwater Management Program (SMP) Document as a PDF file along with the Annual Report.
2. Include an executive summary to this report which briefly covers the major aspects of the MS4 stormwater management program enacted during the year. In completing the executive summary, the preparer should address the following questions.
  - a. Were there any aspects of the program that appeared especially effective at reducing pollutants in your stormwater discharge?
  - b. Were there any aspects of the program that provided unsatisfactory results?
  - c. What was the most successful part of the program?

- d. What was the most challenging aspect of the program?
  - e. Describe any City area MS4 clean-ups and participation.
  - f. Describe the collaboration with other organizations to eliminate stormwater pollution.
  - g. If an audit/inspection of the MS4 program was conducted by the EPA or KDHE during the year, list the items and audit/inspection report identified as required changes and provide a narrative explanation of how the changes were implemented or explain the plan to implement the changes and identify a target date for final implementation.
3. Any new stormwater ordinances/resolutions or revised ordinances/resolutions which have not already been submitted to KDHE for review and retention.

This template annual report document (basic report) for the 2019 reporting period has changed from the annual report format used in previous years. This document focuses on the core aspects of permit requirements including the Stormwater Management Program, the Six Minimum Control Measures (Public Education and Outreach, Public Involvement and Participation, Illicit Discharge Detection and Elimination, Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management in New Development and Redevelopment Projects, and Pollution Prevention/Good Housekeeping for Municipal Operations), Total Maximum Daily Load (TMDL) Best Management Practices and TMDL wet weather monitoring. Additionally, for Phase I permittees a program to monitor listed industrial facilities is required. Although any failure to comply with a requirement of the MS4 NPDES permit may expose the permittee to enforcement action by either the permitting authority (Kansas Department of Health and Environment) or by the Environmental Protection Agency, the failure to implement the core aspects of the permit likely increases the risk of not only enforcement but also of incurring a monetary penalty.

The permittee is well advised to accurately report the conditions and status of their stormwater program and give due consideration of improving or enhancing their program where it is weak, or deficient in any of the core aspects (stormwater management program, six minimum control measures and TMDL best management practices - if applicable - also for Phase I permittees monitoring industrial facilities).

#### **TOPICS REQUIRED TO BE ADDRESSED IN THIS REPORT AS IDENTIFIED IN PART V OF THE PERMIT.**

Within the next one or two pages, or perhaps more if so desired, provide comments addressing the following items (***City of Overland Park responses in bold italics***):

1. Provide the status of compliance with permit conditions, an assessment of the appropriateness of the implemented Best Management Practices, progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP), and the measurable goals with an indication

of the progress toward meeting the goals for each of the six minimum control measures.

***All of the BMPs and activities implemented to address TMDL regulated pollutants are incorporated within the Six Minimum Control Measures (MCM) and TMDL tables detailed in the Interim Stormwater Quality Management Plan (SQMP), dated February 2019. At this time, the BMPs and activities are appropriate for the community and pollutants of concern. A status of compliance with MS4 permit conditions and BMPs detailed in the Interim SQMP can be found in the MCM tables presented in Sections D and E of this report.***

2. Provide results of information collected and analyzed, (for example test results, surveys, or public comments/input) during the annual reporting period. This may include monitoring data used to assess the success of best management practices with respect to reduction in pollutant discharge. Include an interpretation of the information which addresses success or failure of the portion of the program for which the information applies.

***There were three opportunities for public comment on the SQMP activities during 2019. These included two opportunities following the environmental restoration workdays, and one opportunity through the City's dedicated webpage for posting the recent Annual Report, SQMP and NPDES MS4 Permit. This webpage provides the necessary staff contact information for any interested person wishing to provide comments. No comments were made via the website in 2019. Several comments were made following the above listed environmental restoration workday events via an online form and email from participants. All comments were gathered throughout 2019 to be analyzed and incorporated as relevant in 2020. A larger survey of those who have participated in the SQMP outreach program was developed in 2019 for implementation in 2020.***

3. Provide results of information collected and analyzed, if any, during the annual reporting period, including monitoring data used to assess the success of the program at reducing the TMDL regulated pollutants.

***The Dry Weather Monitoring Program (MCM 3.2.3) is the City's most important BMP used to detect illicit discharges and address the elimination of active pollution. This program annually assesses at least 25% of the total outfalls that discharge directly into surface waters. Outfalls with any amount of liquid or evidence of pollution are tested for the following parameters: pH, conductivity, temperature, salinity, total dissolved solids, potassium, ammonia and fluoride. The results are summarized and analyzed annually to identify hotspots of pollution and locations of active pollution. In addition, a desktop assessment was completed in 2019 using data gathered from 2015-2019 to identify outfalls in one of three categories: high risk, low risk, or inaccessible. Results of this assessment can be found in the Illicit Discharge Detection and Elimination BMP in Section E of this report..***

**Another important assessment tool started by the City in 2016 is Stream Health Monitoring Program (MCM 7.2.1). This program assesses the health of streams by sampling important biological, chemical and physical indicators. The program was developed through trainings and tools associated with the following resources: EPA Rapid Bioassessment Protocols for Use in Streams and Wadeable Rivers (2003); EPA Primer on Using Biological Assessments to Support Water Quality Management (2011); NRCS Part 614 Stream Visual Assessment Protocol, ver. 2 (2009); and Johnson County Stream Asset Inventory Field Sampling Protocol (2004).**

**The program assesses all watersheds in the City to include: Turkey Creek, Indian Creek, Tomahawk Creek, Coffee Creek, Wolf Creek, Camp Branch and Blue River. Metrics were selected based on KDHE metrics and those determined to be most informative for the City. These indicators/metrics include KBI, MBI, %Sensitive Organisms, %EPT, and %EP. All invertebrates were identified in the field to the Family level as this was determined to be the most efficient method for assessment of streams.**

**Three years worth of data is still insufficient for determining an accurate trend in stream health. The Stream Health Monitoring Program will continue to meet the following goals:**

- **Identify impacted stream segments and sources of impairments.**
- **Identify structural and non-structural BMPs best suited for stream health.**
- **Assess BMPs and activity effectiveness.**

4. Provide a summary of the stormwater activities that were scheduled to be undertaken during the previous calendar year and the status of these activities.

**All activities planned and completed in 2019 for compliance with the MS4 permit and SQMP are detailed in Sections D and E of this report..**

5. Provide a summary of the stormwater activities which are scheduled to be undertaken during the next calendar year (including an implementation schedule).

**All activities to be completed in 2020 for compliance with the MS4 permit are detailed in the SQMP (dated February 2020) submitted to the KDHE with this Annual Report.**

6. Provide a map showing changes in the permittee's Permit Area if the permit area has changed within the year.

**There are no changes to the jurisdictional boundaries of the City of Overland Park in 2019.**

7. Provide a description of significant changes in any of the BMPs.

**No significant changes will be made to BMPs or activities in the SQMP (dated February 2020). However, we continue to review and refine activities as necessary.**

8. Provide a list of any ordinances or resolutions which were updated in the last year and are associated with the SMP. Please note, page one of this report requires submission of any new stormwater related ordinances or resolutions or any such updated ordinances or resolutions be submitted with this annual report.

***No changes have been made to stormwater quality specific ordinances in 2019.***

9. Provide a list of other parties (such as other municipalities or consultants), which are responsible for implementing any of the program areas of the Stormwater Management Program.

***The City of Overland Park coordinates its stormwater quality management program to meet MS4 Permit requirements. Other parties which provide services, support, or coordination include the following:***

- ***Johnson County Stormwater Management Program - MS4 Program support, collaboration and funding specifically for MCMs 1 and 2.***
- ***Mid-America Regional Council - Education and outreach support for MCM 1.***
- ***K-State Research and Extension - Education and outreach support for MCM 1.***
- ***Blue Valley School District - Educational services for MCM 1***
- ***Shawnee Mission School District - Educational services for MCM 1***

#### **MS4 SIX MINIMUM CONTROL MEASURES (MCM) FOR MS4'S WITH NPDES PERMITS**

The following outlines the NPDES permit requirements for implementation of the Six Minimum Control Measures as required under Kansas MS4 permits issued by the KDHE. The NPDES permit provided to the MS4 authority should be reviewed for additional requirements associated with implementation of the Six Minimum Control Measures such as deadlines for the implementation of the requirements or supplemental requirements associated with the individual measures. The general requirements are as follows:

- A. Six MCMs** — The permittee shall develop and implement Best Management Practices (BMP's) with measurable goals for each of the six minimum control measures. The six minimum control measures and associated requirements are listed and explained as follows:

##### **1. Public Education and Outreach**

The permittee shall implement a public education program which includes distribution of educational materials to the community or conduct equivalent outreach activities which address the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.

##### **2. Public Involvement and Participation**

The permittee shall implement a public involvement and participation program to solicit public comment and recommendations regarding the BMP's and measurable goals

utilized by the permittee to comply with the permit. The permittee shall comply with state and local public notice requirements when implementing a public involvement and participation program.

### 3. Illicit Discharge Detection and Elimination

The permittee shall:

- a. develop, implement and enforce a program to detect and eliminate illicit discharges into the MS4;
- b. Develop a storm sewer system map of the permittee's MS4, showing the location of all outfalls, either pipes or open channel drainage, showing the names and location of all streams or lakes that receive discharges from those outfalls. A copy of the map shall be submitted to KDHE. This map may be submitted as a PDF file(s) on a CD or DVD.
- c. Enact ordinances or resolutions to prohibit non-stormwater discharges into the storm sewer system and implement appropriate enforcement procedures and actions if the permittee has such authority. A copy of the ordinances or resolutions shall be submitted to KDHE.
- d. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and
- e. Develop and implement a plan to detect and address prohibited non-stormwater discharges, including but not limited to illegal dumping, to the storm sewer system. Unless identified by either the permittee or KDHE as a significant source of pollutants to waters of the state, the following examples of non-stormwater discharges are not prohibited from entering the MS4:
  1. Water line flushing
  2. Diverted stream flow
  3. Rising groundwater
  4. Uncontaminated groundwater infiltration as defined under 40 CFR 35.2005(20).
  5. Uncontaminated pumped groundwater
  6. Contaminated groundwater if authorized by KDHE and approved by the municipality
  7. Discharges from potable water sources
  8. Foundation drains
  9. Air conditioning condensate
  10. Irrigation waters
  11. Springs
  12. Water from crawl space pumps
  13. Footing drains
  14. Lawn watering
  15. Individual residential car washing
  16. Occasional not-for-profit car wash
  17. Flows from riparian habitats and wetlands
  18. Dechlorinated swimming pool discharges excluding filter backwash
  19. Street wash waters (excluding street sweepings which have been removed from the street)
  20. Discharges of flows from firefighting activities
  21. Heat pump discharge waters (residential only)
  22. Treated wastewater meeting requirements of a NPDES permit
  23. Sump pump drains
  24. Other discharges determined not to be a significant source of pollutants to waters of the state, a public health hazard, or a nuisance

#### **4. Construction Site Stormwater Runoff Control**

The permittee shall develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation, at a minimum, of the following:

- a. Permittees which have the authority to enact ordinances or resolutions shall enact such ordinances or resolutions to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State and Local law;
- b. Requirements for construction site owners or operators to implement appropriate erosion and sediment control best management practices;
- c. Requirements for construction site owners or operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that are likely to adversely impact water quality;
- d. Procedures for site plan review which incorporate consideration of potential water quality impacts;
- e. Procedures for receipt and consideration of information submitted by the public;
- f. Procedures for site inspection and enforcement of control measures.

#### **5. Post-Construction Stormwater Management in New Development and Redevelopment Projects**

The permittee shall develop, implement, and enforce a program to address post-construction stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development and implementation, at a minimum of the following:

- a. BMP's to prevent or minimize adverse water quality impacts;
- b. Strategies which include a combination of structural and/or non-structural BMPs appropriate for the municipality;
- c. For permittees which have the authority, ordinances or resolutions to address post-construction runoff from new development and redevelopment projects to the extent allowable under State and local law;
- d. Ensure adequate long-term operation and maintenance of BMP's

#### **6. Pollution Prevention/Good Housekeeping for Municipal Operations**

The permittee shall develop and implement an operation and maintenance program that includes employee training to prevent and reduce stormwater pollution from municipal operations activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and MS4 maintenance.

## B. Stormwater Management Program

Please place an "X" in the left boxes to complete the table below.

#	YES	NO	N/A	Question
1	X	<input type="checkbox"/>	<input type="checkbox"/>	Has the Stormwater Management Plan (SMP) been developed and implemented?
2	X	<input type="checkbox"/>	<input type="checkbox"/>	Has the SMP been modified or updated during the reporting period?
3	X*	<input type="checkbox"/>	<input type="checkbox"/>	If the answer to questions 2 above was "YES", has the modified SMP been submitted to the KDHE for review?

\*The updated SQMP (2020) has been submitted along with this 2019 Annual Report

## C. Total Maximum Daily Load (TMDL) Best Management Practices (BMPs)

Some permittees are required to implement BMPs to reduce the discharge of listed TMDL regulated pollutants (potentially any or all of the following pollutants – bacteria, nutrients, and sediment)

Please place an "X" in the left boxes to complete the table below.

#	YES	NO	N/A	Question
1	X	<input type="checkbox"/>	<input type="checkbox"/>	Were any BMPs intended to attenuate the discharge of TMDL regulated pollutants implemented? See your permit to determine if TMDL regulated pollutants are listed for receiving stream(s) affected by your stormwater system (TMDL Table).
2	X	<input type="checkbox"/>	<input type="checkbox"/>	List all of the BMPs intended to attenuate the discharge of TMDL regulated pollutants as identified in the SMP and provide the requested information in the following table.

List all the TMDL BMPs as identified in the SMP and provide the requested information in the following table.

**NOTE:** BMPs specifically implemented to address TMDLs are included in the table below. Other BMPs specific to an MCM, but also provide some benefit to preventing TMDL pollutants are indicated in the MCM tables with a (\*).

**D. TMDL BMP Table**

BMP #	BMP	Act #	Brief BMP Description	Regulated TMDL	Measurable Goal(s)	Progress Achieving Goal(s)
7.1	Continue to implement required wet-weather TMDL monitoring	7.1.1	Requirements as detailed in Section 4.3 of the Interim SQMP (2019) pursuant to the now-expired NPDES MS4 Permit (2015-2019)	Bacteria, Nutrients, Sediment	Comply with monitoring requirements (Johnson County Stormwater Management now oversees these permit requirements for the City of Overland Park as of 1/1/2019)	Continued to comply with permit requirements
7.2	Continue to implement a Stream Health Monitoring Program sampling all surface waters in the City.	7.2.1	City staff will monitor physical, chemical and biological health indicators to determine areas of concern and water quality trends.	Bacteria, Nutrients, Sediment	Sample watersheds to maximum extent practical.	14 stream sampling sites; 6 lake sampling sites
		7.2.2	Implement bacteria monitoring ( <i>E.coli</i> ) into the Dry Weather Monitoring Program.	Bacteria	Determine areas of concern and further assess locations. Track sampling events	30 stream samples analyzed; 41 lake samples analyzed
					Test all “suspect” or “obvious” pollution rated outfalls for bacteria. Track number of positive and negative bacteria samples.	31 samples taken, no definitively positive results.
7.3	Implement pilot projects for structural BMPs	7.3.1	Identify opportunities to incorporate structural BMPs based on monitoring results and targeted pollutants	Bacteria, Nutrients, Sediment	Track progress of opportunities to treat regulated TMDLs/POCs	Floating Wetland Project: 75 ft2 installed in 2018, and additional 5 ft2 installed by an eagle scout in 2019 (total 80 ft2 of structure)

**Note:** Most BMPs and activities listed in the following MCM tables have the secondary benefit of limiting TMDL impairments. Those activities/BMPs which limit impairments will be noted in the following tables.

**E. SMP Requirements (Six Minimum Control Measures)(CONTINUED)**

**1. Public Education and Outreach (Table)**

BMP #	BMP	Act #	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s)
1.1	*Implement a multi-media education campaign for individuals, businesses and organizations focusing on stormwater pollutants.	1.1.1	*Produce and distribute environmental education media through print, webpages, newsletters and social media.	*Produce 10 articles per year.	15 articles produced (4 Overviews, 4 public education pamphlets, 6 new webpages <sup>^</sup> ; 1 Blue River Report Card <sup>^^</sup> ), and 2 news articles posted with aid from the City.
				*Track website traffic.	79,387 page views <sup>^</sup> .
				*Produce 10 social media posts.	71 social media posts, generating 6,041 impressions.
		1.1.2	*Participate in local events to engage residents and distribute educational materials.	*Participate in 5 local events each year.	7 events, 13,950 citizens: Healthy Yards (1700), Recycling Extravaganzas (1800), June Bug Ball (100), Youth Fishing Derby (150), Plog-a-Thon (200), KC Marathon (10,000).
		1.1.3	*Produce audience specific water quality/stormwater pollution education targeting specific pollutants of concerns and /or sources throughout the City.	*Develop and implement outreach and education materials for residents and community groups.	Education material was developed for (1) new pool construction, and (2) posted to social media platforms for proper pool dewatering and chlorine impacts to water quality (Posted on 8/24/2019 with 30 impressions)
				Provide Request-a-Speaker Program. Track annual speaking opportunities and participants.	15 speaking events, with a total of 437 participants
				*Develop and implement outreach and education materials for businesses.	Material was drafted for lawn care companies in 2019, but put on hold for collaboration with other local government entities in 2020.
		1.1.4	*Partner with the MARC Water Quality Education Committee and participate in a regional stormwater education program.	Regional education campaign, print media, KC Metro regional Survey, Webinars and Training, Grant Program.	See Appendix A for full report.
		1.1.5	*Increase awareness of pet waste contributions to bacteria impairments and encourage behaviors that reduce bacteria.	Partner with pet licensing and pet supply stores to target education materials.	Material developed and distributed at events, workshops and during citizen concerns. Work began in 2019 to continue in 2020 with pet licensing education materials.
Install pet waste bags dispensers in City Parks.	35 pet waste stations maintained and approx. 140,000 bags used.				
1.1.6	Conduct a survey to determine resident awareness, target education and measure program effectiveness.	Conduct a survey twice per permit cycle	Survey completed in 2018, incorporated into education plan in 2019.		
1.1.7	Provide an interactive map of the storm sewer system on the City website.	Track website traffic.	Map maintained continuously		
1.2	Provide stormwater pollution education to schools	1.2.1	*Continue to implement a program that educates students in grades K-12 on stormwater pollution, water quality and local pollutants of concern.	Develop and implement an educational program.	9,950 K-12 students educated during the 2018-2019 Water Quality Public Education Service Agreement between the City the two primary school districts (Shawnee Mission & Blue Valley School Districts); **An additional est. 4,430 Overland Park students were educated through the JOCO SMP education program. (total est. educated students was 14,380)

\* = Indicate secondary purpose as TMDL BMP/Activity

\*\*= Indicates numbers provided by Johnson County Stormwater Management Program in conjunction with City funding, for BMPs performed in Overland Park

<sup>^</sup> = The City website was officially redesigned in 2019 which allowed for web pages to be created, but decreased the number of total page views overall.

<sup>^^</sup> = In partnership with MARC and Heartland Conservation Alliance.

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

**2. Public Involvement and Participation (Table)**

BMP #	BMP	Act #	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s)
2.1	*Maintain a program to promote participation in activities that target stormwater pollutants.	2.1.1	*Provide an event for homeowners that raises the awareness of the water quality benefits of stormwater treatment.	Provide a biennial event to promote the installation of stormwater treatment practices.	**7 native plant workshops held with 145 participants
		2.1.2	*Provide voluntary STF Cost-Share Program for residents through the Johnson County SMP	Provide funding to applicable residents.	39 program participants; installed 45 STFs; \$11,642 in reimbursements.
		2.1.3	*Provide involvement opportunities for residents that raise awareness for the importance of healthy streams.	Provide a program for annual community stream cleans.	Annual Stream Clean held on 4/6/2019 with 750 participants
				Provide a program for annual environmental restoration and riparian tree plantings at City parks.	4 events (3 environmental restoration workdays, 1 riparian tree planting event) with a total of 240 attendees, planting 110 trees and removing 700 cubic yards of invasive honeysuckle.
				Develop a water quality themed education/involvement program at City facility.	Continued work with Overland Park Arboretum on a water quality themed program (meeting held on 5/4/2019).
2.1.4	*Continue to promote and participate in the soil testing program provided by the Johnson County SMP & K-State Research Extension.	Increase participation annually through outreach, education and demonstration.	302 soil tests analyzed for Overland Park residents.		
2.2	Provide opportunity for public input on the Stormwater Management Plan.	2.2.1	Solicit input on PEO and PIP MCMs	Utilize the Overland Park Environmental Advisory Council for program input.	11 EAC meetings held in 2019 where water quality and environmental stewardship were primary topics. Input given in smaller group settings.
				Contact program participants for feedback on events, education and involvement opportunities.	Survey material was created in 2019 to be distributed in 2020. Feedback was provided in person after all events.
		2.2.2	Post the City MS4 permit, SMP and annual reports on the City website.	Develop page, post materials and update annually with SMP changes and annual reports.	Permit, Interim-SQMP and the 2018 Annual Report were posted on the City website on 4/24/2019. The 2019 Annual Report, updated SQMP and new MS4 Permit will be posted once finalized.
2.2.3	Provide opportunity for the public to comment on ordinance changes.	Provide opportunity for public comment on ordinance changes when they occur.	Public were provided opportunities for comment on ordinance changes.		

\* = Indicate secondary purpose as TMDL BMPs

\*\*= Indicates numbers provided by Johnson County Stormwater Management Program in conjunction with City funding, for BMPs performed in Overland Park

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

3. Illicit Discharge Detection and Elimination

Please place an “X” in the left boxes to complete the table below.

#	YES	NO	N/A	Question
1	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a program/plan been developed and is it presently implemented to detect and address illicit/prohibited discharges into the MS4?
2	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a map of the MS4 been developed, showing the location of all outfalls, either pipes or open channel drainage, showing names and locations of all streams or lakes receiving discharges from the outfalls?
3	X	<input type="checkbox"/>	<input type="checkbox"/>	The permit may require the permittee enact ordinances, or resolutions. Have ordinances, or resolutions or regulations to prohibit non-stormwater discharges into the storm sewer system been enacted?  Effective date: <b>March 31, 2006</b> <b>OPMC 7.58 - “Stormwater Pollution to Storm Sewers and Surface Waters”</b> ; Submitted to the KDHE 2/28/2018
4	<input type="checkbox"/>	X	<input type="checkbox"/>	Have the ordinances, resolutions or regulation been modified? Effective date: <b>N/A</b>

List all the Illicit Discharge Detection and Elimination BMPs as identified in the SMP and provide the requested information in the following table.

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

**3. Illicit Discharge Detection and Elimination (Table)**

BMP #	BMP	Act #	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s)
3.1	Employee education and training.	3.1.1	*Train field staff on detecting and reporting illicit discharges.	Hold annual trainings.	3 trainings held for 17 City staff; 150 Fire Department staff completed Hazardous Materials training; 34 Fire Department Staff completed Haz-Mat Technician Competencies.
				Distribute the Stormwater Pollution Response Matrix to administrative and supervisory staff.	Distributed the 2019 updated matrix to investigative, administrative and supervisory staff as necessary.
3.2	*Implement and enforce a program to detect and eliminate illicit discharges within City limits.	3.2.1	*Respond to, investigate, and track potential illicit discharges.	Investigate all potential illicit discharges and track the number of cases and inspections.	13 cases were investigated resulting in 12 inspections. 50 complaints were received but did not require action.
		3.2.2	Maintain a public reporting mechanism.	Maintain public Customer Service Response (CRS) system.	Residents may report illicit discharges through an online complaint system. No illicit discharges were reported through the CRS in 2019
		3.2.3	*Implement a Dry Weather Monitoring program.	Inspect at least 25% of identified outfalls, and perform further investigations for all outfalls determined to be "suspect" or "obvious" for pollution.	291 (26%) outfalls inspected, 31 outfalls designated "suspect" or "potential" were inspected.
				Conduct a desktop assessment biennially to identify high priority areas and rate outfalls for future monitoring.	Assessment conducted in 2019; 45 (4.15%) High Risk outfalls, 932 (85.7%) Low Risk outfalls, and 110 (10.15%) Inaccessible outfalls.
		3.2.4	*Regulate septic system installation and usage.	Track the number of permits issued, inspections completed, and complaints received.	16 total permits (6 new single family systems, 6 replacements, 4 septic-to-sewer transitions); 27 septic system inspections; 1 complaint received, and no system failures.
3.2.5	Maintain an interactive storm sewer system map to assist in tracking pollution sources.	Review annually and update as needed.	Map updated continuously.		
3.3	Review and Update Ordinance, Policies and Standard Operating Procedures	3.3.1	*Implement and review the Stormwater Pollution Ordinance.	Review once every permit cycle and update as needed.	No updates to ordinance.
		3.3.2	Implement, review and update the Illicit Discharge Response Matrix with involved staff.	Review annually and update as needed.	Reviewed and updated Response Matrix in 2019.
		3.3.3	Implement and review illicit discharge invitation SOPs.	Review annually and update as needed.	Reviewed in 2019, no updates.
		3.3.4	Implement and review Dry Weather Monitoring SOPs.	Review annually and update as needed.	Reviewed in 2019, no updates.
		3.3.5	*Continue to develop a cooperative agreement between City departments for response and reporting of spill events.	Continue to develop and finalize a cooperative agreement by 2021.	Continued to develop an agreement with the Fire Department.

\* = Indicate secondary purpose as TMDL BMPs

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

4. Construction Site Stormwater Runoff Control

Please place an “X” in the left boxes to complete the table below.

#	YES	NO	N/A	Question
1	X	<input type="checkbox"/>	<input type="checkbox"/>	The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development and redevelopment projects been enacted? Effective date: <b>March 31, 2003</b> <b>OPMC 16.200 - “Erosion and Sediment Control”;</b> <b>Originally submitted to KDHE on 2/28/2018; 2018 ordinance revision submitted on 2/28/2019</b>
2	X	<input type="checkbox"/>	<input type="checkbox"/>	Has the copy of the ordinances or resolutions been submitted to KDHE as required by the permit? (include new Ordinance)
3	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure or program been developed requiring construction site owners and/or operators to implement appropriate erosion and sediment control BMPs?
4	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure or program been developed requiring construction site owners and/or operators to control waste such as discarded building materials, concrete truck washout, chemicals, paint, litter, and sanitary waste at construction sites likely to cause adverse impacts to water quality?
5	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed and implemented requiring site plan review which includes consideration of potential water quality impacts?
6	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed for the receipt and consideration of information submitted by the public?
7	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed and implemented for construction site inspection and enforcement of the control measures?

List all the construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the following table.

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

**4. Construction Site Stormwater Runoff Control (Table)**

BMP #	BMP	Act #	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s)
4.1	*Implement and enforce a program for the construction industry to reduce pollutants in stormwater runoff from land disturbance activities disturbing 1 acres or more or part of a larger common plan.	4.1.1	Prior to issuance of an LDP, require an authorized NOI for Stormwater Construction Runoff.	Request a copy of NOI and keep on file.	Authorized NOI is required before issuance of an LDP.
		4.1.2	*Review submitted erosion and sediment control plans.	Review all sediment and erosion control plans.	199 project submissions and 478 reviews conducted.
		4.1.3	Hold pre-construction meetings to clarify BMPs for sites.	Require pre-construction meetings as needed.	Pre-construction meetings held for projects disturbing one acre or more to clarify BMPs for the site.
		4.1.4	Map land disturbance sites.	Track permits and link database to ArcMap. Track new sites and active sites annually.	92 new and 365 active sites in 2019: Bldg Safety - 57 new sites, 191 active sites; Eng. Services - 35 new sites, 166 active sites; Public Works - 8 sites
		4.1.5	*Implement inspection program of land disturbance sites.	Inspect land disturbance sites based on inspection prioritization guidance and standard inspection form.	2,439 total inspection: Bldg Safety: 1,771 inspections; Eng Services: 509 inspections; Public Works: 159 inspections.
		4.1.6	*Enforce Erosion and Sediment Control Ordinance.	Implement escalating enforcement of construction sites as directed in enforcement policy.	3 enforcement actions taken.
		4.1.7	*Maintain a public reporting mechanism.	Maintain public CRS system.	33 complaints received through CRS, email and phone calls.
		4.1.8	Provide the StormWatch website to disseminate real-time rainfall data.	Track website traffic	Website continually maintained and subscribers tracked.
4.2	Review and update City ordinances, policies, specifications, and details	4.2.1	Review Construction Specifications and Construction Details.	Review biennially and update as needed.	Reviewed in 2018, will be reviewed in 2020.
		4.2.2	Review standard for single family residential BMPs.	Review biennially and update as needed.	Standards reviewed and updated in 2019.
		4.2.3	Review Inspection and Enforcement Guidelines.	Review biennially and update as needed.	Policy reviewed and updated in 2018.
		4.2.4	Review Erosion and Sediment Control Ordinance.	Review ordinance once every permit cycle and update as needed.	Ordinance reviewed in 2018.
4.3	*Reduce stormwater pollution from construction site runoff for City administered public improvements.	4.3.1	*Require a Certified Water Pollution Control Manager (WPCM) and Environmental Inspector (EI) during construction phase for projects of 1 acre or greater that are administered by the Public Works Department.	Track number of projects that utilize WPCM and EI.	7 Public Works projects utilized WPCM and EI in 2019
4.4	*Provide training and education opportunities for City staff and the engineering and construction industries.	4.4.1	*Develop and implement a quality assurance program to identify training topics for City staff.	Building Safety, Engineering Services and Public Works supervisors will visit a random sampling of construction sites twice per year.	Supervisors and project managers visited active land disturbance sites for compliance
		4.4.2	Provide resources related to BMP selection, installation and maintenance.	Number of resources made available. Review annually and update as needed.	11,674 total pageviews for online publications and pages.
		4.4.3	*Provide training opportunities to designers and contractors.	Provide at least one training opportunity annually.	**Two four-hour courses held on erosion control from JOCO contractor licensing, resulting in 140 participants (63 of which became certified).
		4.4.4	*Provide classroom and field training to city staff.	Provide training opportunities annually.	2 training opportunities held with 24 participants.

\* = Indicate secondary purpose as TMDL BMPs

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)****5. Post-Construction Site Stormwater Management in New Development and Redevelopment**

Please place an "X" in the left boxes to complete the table below.

#	YES	NO	N/A	Question
1	X	<input type="checkbox"/>	<input type="checkbox"/>	The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development and redevelopment projects been enacted?  Effective date: <b>March 31, 2008</b> <b>OPMC 16.210 - "Stormwater Treatment";</b> <b>Submitted to the KDHE 2/28/2018</b>
2	X	<input type="checkbox"/>	<input type="checkbox"/>	Has the copy of the ordinances or resolutions been submitted to KDHE as required by the permit?
3	X	<input type="checkbox"/>	<input type="checkbox"/>	Has a post-construction stormwater runoff program been implemented?
4	X	<input type="checkbox"/>	<input type="checkbox"/>	Have post-construction sites been inspected?
5	X	<input type="checkbox"/>	<input type="checkbox"/>	Are BMPs specified to minimize adverse water quality impacts?
6	X	<input type="checkbox"/>	<input type="checkbox"/>	Have strategies been developed to include a combination of structural and/or non-structural BMP appropriate for the municipality?
7	X	<input type="checkbox"/>	<input type="checkbox"/>	Have measures been implemented to ensure adequate long-term operation and maintenance of structural BMP's?

List all the post-construction site stormwater management in new development and redevelopment BMPs as identified in the SMP and provide the requested information in the following table.

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

**5. Post-Construction Site Stormwater Management in New Development and Redevelopment (Table)**

BMP #	BMP	Act #	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s)
5.1	Review and update ordinance, standards, specifications and checklists	5.1.1	Review Stormwater Treatment Ordinance.	Review once every permit cycle and update as needed.	Review began in 2019, changes planned for 2020.
		5.1.2	Review Stormwater Treatment Design and Construction Standards.		Review began in 2019, changes planned for 2020.
		5.1.3	Review Stormwater Treatment Construction Plan Review Checklist.		Review began in 2019, changes planned for 2020.
		5.1.4	Review Stream Setback Ordinance		Review began in 2019, changes planned for 2020.
5.2	*Provide training and education opportunities	5.2.1	*Provide training opportunities to designers and contractors for private STFs.	Provide training biennially.	Two conferences were held in 2019 with participation from the City, and access to contractors/designers (Plan It Native Conf., 9/18-20; KC Urban Stormwater Conf., 2/4-5)
		5.2.2	*Provide training for STF plan review staff.	Provide training annually.	5 trainings with 17 participants.
5.3	*Implement and enforce a program to address post-construction runoff from new development and redevelopment projects	5.3.1	Require maintenance agreements of all STFs to ensure maintenance and repair of facilities.	Agreement required prior to permit issuance. Track maintenance agreements.	21 maintenance agreements recorded.
		5.3.2	*Enforce Stormwater Treatment Ordinance.	Develop and implement enforcement policy.	Continue to develop enforcement policy guidelines.
		5.3.3	Require a post-construction certification of private STFs.	Certification required before permit closure. Track certifications.	17 design certifications issued.
		5.3.4	Require maintenance and inspection certification for all STFs.	Initial certification required 1 year after installation and every 2 years thereafter. Track certifications.	13 Recertifications received.
		5.3.5	Maintain an inventory detailing the types and locations of private STFs	Track private STFs and map all STFs in GIS.	21 projects totaling 59 STFs.
		5.3.6	*Develop and implement a quality assurance program for private STFs to evaluate program compliance.	Staff to inspect a random sampling of installed STFs annually.	No sites inspected.
		5.3.7	Develop guidance for post-construction BMP selection on Public Works projects		Guidance continues to be developed.
		5.3.8	Maintain a public reporting mechanism.	Maintain public CRS system.	3 complaints received.
		5.3.9	*Maintain an inventory of platted stream corridors within City boundaries	Map all platted stream corridors and report total acreage of new stream corridor.	17.74 acres new in 2018; 478.82 total acres of protected stream corridor.

\* = Indicate secondary purpose as TMDL BMPs

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

6. Pollution Prevention and Good Housekeeping for Municipal Operations

Please place an "X" in the left boxes to complete the table below.

#	YES	NO	N/A	Question
1	X	<input type="checkbox"/>	<input type="checkbox"/>	The permit requires the permittee to enact a program to address pollution prevention/good housekeeping for Municipal Operations. Has such a program been enacted?

List all municipal pollution prevention/housekeeping BMPs as identified in the SMP and provide the requested information in the following table.

**E. SMP Requirements (Six Minimum Control Measures) (CONTINUED)**

**6. Pollution Prevention and Good Housekeeping for Municipal Operations (Table)**

BMP #	BMP	Act #	Brief BMP Description	Measurable Goal(s)	Progress Achieving Goal(s)
6.1	*Employee education and training	6.1.1	*Train City staff on pollution prevention and good housekeeping in daily operations.	Hold annual training for targeted City staff.	4 trainings held for 27 staff.
6.2	*Reduce stormwater pollution from municipal operations activities	6.2.1	*Develop and implement a Pollution Prevention Program for City-owned facilities.	Review program annually and update as needed.	Program documents reviewed and updated in 2019.
				Develop and implement individual SWPPPs for City facilities with high stormwater pollution potential	Analysis of pollution risk hotspots was conducted in Year 3 (2016). SWPPPs finalized for all 3 high pollution risk sites. Ongoing water quality monitoring for Pollutants of Concern began in 2018 and was incorporated into the SQMP.
				Develop and implement a general pollution prevention plan for City facilities with low to moderate stormwater pollution potential.	3 SWPPPs are in place; a program guidance document was developed in 2019, detailing inspections, trainings, activities and other pertinent information for all City-owned facilities.
				Implement an inspection program for all City-owned facilities, the frequency of inspections will be based on pollution potential ratings.	A total of 90 inspections conducted in 2019. Refer to Table 1 "Municipal Facility Stormwater Pollution Inspections" below.
		6.2.2	Maintain an interactive storm sewer system map.	Review annually and update as needed.	Map updated continuously.
		6.2.3	*Continue to implement a comprehensive snow/ice operations pollutant reduction program.	Reduce pollutants from snow operations through the use of calibrated material spreaders, GPS and application rate tracking, targeted spread rates, pavement temperature sensors, pre-wetting agents, and an emphasis on anti-icing.	City continues to implement a comprehensive snow pollutant reduction program through the use of identified BMPs. 11,785 tons of salt, 43,965 gallons MgCl and 2,993 tons of salt/sand mix were applied to roads during 8 winter events in 2019.
		6.2.4	*Continue to implement a comprehensive street sweeping program.	Residential, collector and thoroughfare streets will be swept twice per year.	Residential, collectors and thoroughfares swept twice for a total of 4040 lane miles swept collecting 7,819 cubic yards of debris.
		6.2.5	Continue to implement a program of systematic inspection and maintenance of public thoroughfare STFs.	Inspect all STFs at a minimum of every 2 years. Number of annual maintenance completed.	Continued inspection and maintenance program of public thoroughfare STFs.
6.2.6	*Continue to implement a program of systematic stormwater structure inspections, cleaning, and repairing.	Inspect 5% of inlets/year; 5% of pipe/year; all box culverts/3 years, bridges/2 years and ditch liners/3 years. Track number of annual repairs and cleanings	621 inlets, 4,089 lin.ft. pipe, 44 box culverts, 0 lin.ft. of ditch liner, and 0 bridges insp. removing 880 yd <sup>3</sup> of debris from MS4.		

\* = Indicate secondary purpose as TMDL BMPs

Table 1 - "Municipal Facility Stormwater Pollution Inspections"

Stormwater Pollution Risk	# of Facilities	Facility Types	Inspection Goals	*2017 Inspections	2018 Inspections	2019 Inspections
High	3	Public Works Maintenance (2), Parks and Forestry Operations	Monthly (12 each/year) or 36 total inspections (at least 1 wet-weather event)	12	34	42
Moderate	4	Golf Course Operations (2), Arboretum, Children's Farmstead	Biannually (2 each/year) or 8 total inspections (1 dry-weather, 1 wet-weather event)	3	10	7
Low	19	Outdoor Pools (5), Public Safety Stations (8), Administrative (3), Community Centers (2), Clean Rubble Site	Biannually (2 each/year) or 38 total inspections (1 dry-weather, 1 wet-weather event)	36	41	41
TOTAL	26	--	82	51	85	90

\*Not all SWPPPs were finalized, nor was the inspection plan finalized in 2017.

## F. Recordkeeping and Reporting

All requirements for monitoring TMDL impaired surface waters in the City of Overland Park have shifted to Johnson County, Kansas (M-KS52-SU02) pursuant to the language in the new NPDES MS4 Permit (2019).

**G. 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 of Permittee: Bill Ebel Date Signed: 2/18/20  
(Legally Responsible Person)

Name (printed): Bill Ebel Title: City Manager

**40 CFR 122.22 Signatories to permit applications and reports.**

(a) Application. All permit applications shall be signed by either a principal executive officer or ranking elected official.

All reports required by permits, and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person.

Please note the submission requirements on Page 1. Submit this report to:

**KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT**

Municipal Programs Section  
1000 SW Jackson Street, Suite 420  
Topeka, Kansas 66612