

City of Manitowoc
Addendum:
Notice of Intent to Apply for Coverage Under MS4 General Permit

The following discussion is intended to respond to each of the six elements identified in Section IV: Summary of Municipal Program Activities required in the Notice of Intent (NOI) to Apply for Coverage Under MS4 General Permit WPDES Permit No. WI-S050075, for the City of Manitowoc.

The information presented in this Addendum to the NOI is understood to be a representation of current and potential future program elements, including measurable goals where known or applicable at this time. It is further understood that the WDNR requires detailed program proposals for each of the six elements as scheduled in the General Permit and that the final activities presented in those program proposals may differ from that presented in this NOI.

A. Public education and outreach

As required by Wisconsin Department of Natural Resources (WDNR) Permit Condition 2.1 of the General Permit to Discharge under the Wisconsin Pollutant Discharge Elimination System WPDES Permit No. WI-S0500765-1, herein called the “General Permit,” the City of Manitowoc will develop and implement a public education and outreach program to increase awareness of storm water pollution impacts and to encourage positive changes in public behavior to reduce such impacts.

Currently, the City of Manitowoc utilizes the following methods and techniques to inform staff and the public at large on storm water related issues:

- Website – The City maintains pertinent information related to storm water issues on their website at: http://www.manitowoc.org/dept_storm.html and contains:
 - General storm water information
 - A Contractors page with general storm water information, post-construction storm water management ordinance/permit information, construction site erosion control ordinance information, permit forms, and links to WDNR regulations and other interesting web pages
 - A Citizen Action page that provides beach conditions, information on various household practices that affect storm water (lawn care, household waste disposal, leaf collection, and pet waste), and links to other interesting web pages
 - Storm drain stenciling opportunities
 - Information on the City’s upcoming new General Permit
 - Information on the Storm Water utility currently under consideration

- Storm Water Information Bulletin Board – The City currently maintains a bulletin board next to the Engineering Department’s office at City Hall for storm water facts and information.

- Annual Contractors Meeting – The City currently conducts an annual meeting with contractors to discuss storm water management (construction and post-construction) issues.
- Brochure/leaflet distribution – The City currently makes various informational brochures available to the public, and they are available either on or near the Storm Water Information Bulletin Board at City Hall.
- Local Radio Broadcasts – The Mayor has a weekly radio program, “3 Minutes with the Mayor” and is on the local radio station’s “be my guest” program monthly. Both programs in the past have been used as a forum to discuss and present storm water-related issues.
- Internal Staff Newsletter (Wavelength) – The City maintains an internal staff newsletter (not available to the general public) that includes issues of importance including storm water-related information as needed.

The City of Manitowoc will evaluate the current public information and outreach methods and techniques and will attempt to maximize the current program’s effectiveness by considering the following additions:

- Expanding on locations for distributing informational brochures and preprinted materials such as the Manitowoc Public Utilities, Department of Public Works, Parks & Recreation Department, YMCA, Library, Marina, Maritime Museum, Rahr-West Art Museum, Visitors Center, and Silver Lake College.
- Actively identify partners, partner organizations, and special events opportunities that can help carry program messages. Organizations under consideration include Manitowoc Public Utilities, Chamber of Commerce, and various service clubs/organizations in the City. Events include the Salmon Derby, Earth Day, County Fair and other County Expo Events.
- Maximize the use of educational materials already developed by EPA, WDNR, UW-Extension, and others. Educational materials will be selected based on their relevancy to local conditions and will promote multiple strategies, wherever possible.
- Consider using the public Cable TV access to show educational videos or taped events.
- Strategies to educate the public will include a mix of outreach techniques, including techniques designed to target minority and disadvantaged communities.

Using the current and potential methods and techniques described above, develop and submit a public education and outreach program to the WDNR that will address the following eight (8) program areas as required by the General Permit:

1. Promote detection and elimination of illicit discharges. Efforts include educating the public on spills or illegal dumping, and asking them to notify the City or other appropriate entities such as WDNR or the police or fire department if they see activities or notice water quality problems in receiving waters.
2. Inform and educate the public about proper management of materials that may cause pollution: Efforts include educating the public on ways they can avoid polluting the environment from sources including automobiles, pets, household hazardous waste, etc.
3. Promote beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides.
4. Promote the management of streambanks and shorelines by riparian landowners to minimize erosion or other pollution sources and enhance the ecological value of waterways and lakes.
5. Promote infiltration of residential storm water runoff from rooftop downspouts, driveways and sidewalks.
6. Inform and where appropriate educate those responsible for the design, installation, and maintenance of construction site erosion control practices and post-construction storm water management facilities.
7. Identify businesses and activities that may pose a storm water contamination concern and, where appropriate, educate specific audiences on methods of storm water pollution prevention.
8. Promote environmentally sensitive land development designs by developers and designers.

Measurable goals of this effort include:

- Meet the WDNR Compliance Schedule:
 - Permit coverage date + 18 months: Draft a public education and outreach program to educate the public about the causes and sources of pollutants of concern, and submit it to WDNR.
 - Permit coverage date + 24 months: Implement all aspects of the approved education and outreach program.
- Other Specific Goals:
 - Provide targeted public education and information efforts that address each of the eight program areas identified above at least once during the term of the permit according to the schedule to be developed in the future program submittal.
 - Continue to conduct annual contractor meetings.

B. Public involvement and participation

As required by General Permit Condition 2.2, the City of Manitowoc will develop and implement a public involvement and participation program to notify the public of activities required by the General Permit and to encourage input and participation from the public regarding these activities. The program shall include measurable goals for public involvement and participation and comply with applicable state and local public notice requirements.

Currently the City of Manitowoc utilizes the following methods and techniques to elicit public involvement and participation on storm water-related issues:

- Publishes public notices as required by state and local requirements in the Manitowoc Herald Times Reporter.
- Invites the public to state concerns or issues through a regular public comment forum at the second common council meeting of every month.
- Holds an annual public budget hearing in which storm water related budget items may be discussed in detail.

The City of Manitowoc will evaluate the current public involvement and participation program and will attempt to maximize the current program's effectiveness by considering the following additions:

- Make the City's General Permit available for public review at City hall and posted on the web site with pre-printed comment forms or electronic feedback/email systems for the public to provide input/comment.
- Make all program proposals and deliverables, including annual reports to WDNR, required by the City's General Permit available for public review at City hall and/or posted on the web site with pre-printed comment forms or electronic feedback/email systems for the public to provide input/comment.
- Annual public meeting – In addition to the public comment period currently held at common council meetings, consider having a specific targeted annual public meeting to present the current state of storm water management within the City. The City will request attendance at an annual public meeting or agenda item at an existing municipal meeting to discuss the status of the General Permit, inform residents of associated programs, and receive feedback on improving the program.

Measurable goals of this effort include:

- Meet WDNR Compliance Schedule:
 - Permit coverage date + 18 months: Prepare a public involvement and participation program and submit it to WDNR.
 - Permit coverage date + 24 months: Implement the public involvement and participation program.

- Other Goals:
 - Make permit-related (and other relevant storm water documents) available for public review and comment in accordance with the schedule and specifics to be outlined in the public involvement and participation program proposal and track the number and nature of comments received.
 - Annually, following implementation of the public involvement and participation program, conduct public meetings on the current state of storm water within the City and request public feedback.

C. Illicit discharge detection and elimination

As required by General Permit Condition 2.3, the City of Manitowoc will develop and implement an Illicit Discharge Detection and Elimination (IDDE) program to detect and remove illicit connections and discharges to the City of Manitowoc's municipal separate storm sewer system (MS4).

Currently, the City of Manitowoc has an extensive digital map of the storm sewer system. The map provides the alignment and outfall of all publicly owned storm sewers, storm sewersheds/basins, receiving waters, municipal boundary, storm water management facilities (both public and private) and the size/elevation of each pipe and outfall.

The City of Manitowoc Fire Department has a spill response plan in place to contain and control petroleum and hazardous chemical spills and releases.

An illicit discharge detection and elimination program will reduce the risk of indirect and direct non-storm water connections degrading receiving water quality and threatening aquatic, wildlife and human health. The City of Manitowoc does not currently have a formal illicit discharge detection and elimination program in place. To comply with the components of General Permit Condition 2.3, the City of Manitowoc proposes the following approach to developing an IDDE program. This approach will be reviewed and refined in the IDDE Program Proposal to WDNR as identified in the measurable goals section that follows this draft program approach.

The City of Manitowoc's overall strategy for developing and implementing an IDDE program is as follows:

- Modify the City's MS4 system mapping to include the locations of WPDES permits, public works facilities, parkland and other open space and recreational areas, and major conveyance system components not currently identified on the existing map.
- Develop an ordinance that:
 - Prohibits illicit discharges including spilling or dumping of non-storm water substances or materials into waters of the state and the MS4
 - Identifies/defines non-storm water discharges or flows that are not considered illicit discharges (i.e. allowable)
 - Includes appropriate enforcement actions.
- Develop a field screening program that:
 - Conducts an initial field screening at all major outfalls during dry weather periods
 - Contains visual observation procedures and methods in accordance with NR 216.07(3)(i). An illicit discharge inspection form will be developed for use during field screening, and will be used for all inspections to record color, turbidity, surface sheen, odor, flow depth, flow velocity, deposits or stains, damage to outfall structures, temperature, and chemical testing results, if necessary. Contains procedures for on-going dry weather field screening.

- Develop procedures for responding to known or suspected illicit discharges that:
 - Include methods and processes for follow-up investigations based on the field screening or other information that indicates a reasonable potential for illicit non-storm water discharges.
 - Respond to spills that discharge to the MS4 including tracking and locating the source of the spill if unknown.
 - Prevent and contain spills that may discharge into or are already within the MS4.
 - Notify the WDNR and other appropriate agencies in the event that the City identifies a spill or release of a hazardous substance that has or may result in the discharge of pollutants into waters of the state.
 - To the maximum extent practicable eliminate leakage from sanitary conveyance systems into the MS4.
 - Provide the WDNR with advance notice of time and location of dye testing within the MS4.

- Take appropriate action to remove illicit discharges from the MS4 system as soon as possible. If disconnection/removal takes more than 30 days, the WDNR shall be contacted to discuss appropriate action and/or timeframe for removal.

- In the case that an identified or suspect illicit discharge originating in the City of Manitowoc's MS4 enters the MS4 of a neighboring municipality, the City will notify the neighboring MS4 within one working day. Likewise, if an identified or suspected illicit discharge is identified as originating from a neighboring MS4, the City of Manitowoc will notify the neighboring MS4 of the discharge within one working day.

- The City of Manitowoc will provide the name, title, and phone number of the individual(s) responsible for responding to reports of illicit discharges and spills in the illicit discharge response procedures to be submitted to the WDNR.

- The status of the IDDE inspections and detections, and documentation will be made part of an annual report. The annual report will include the number of outfalls screened, the number of complaints received, the number of discharges eliminated, and the number of tests conducted, as relevant.

- As part of the previously described education and outreach program, the public will be informed regarding procedures for reporting spills and illicit discharges.

- The City will continue to elicit and coordinate volunteers to stencil storm drains.

Measurable goals of this effort include:

- Meet WDNR Compliance Schedule:
 - Permit coverage date + 24 months: Develop and submit to WDNR the illicit discharge and elimination ordinance and response procedures.
 - Permit coverage date + 30 months: Adopt the ordinance and implement the response procedures.
 - Permit coverage date + 36 months: Complete initial field screening. Submit proposed on-going field screening program to WDNR.
 - Permit coverage date + 48 months: Implement on-going field screening program.
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- Meet WDNR Storm Sewer Map Goal:
 - Permit coverage date + 24 months: Complete modifications to the existing MS4 outfall map.

C. Construction site pollutant control (NR 151.11)

General Permit Condition 2.4 requires that the City of Manitowoc develop, implement, and enforce a program to reduce the discharge of sediment and construction materials from construction sites.

The City of Manitowoc Building Inspection Department is responsible for administering erosion control projects associated with one and two family dwellings and the Engineering Department is responsible for administering all other erosion control projects.

Currently the City of Manitowoc has the following construction site erosion control elements in place:

- A Construction Site Erosion Control Ordinance (Section 29 of the Manitowoc Municipal Code)
- Decision-making flow chart for municipal staff and contractors
- Erosion Control and Stormwater Management Application
- Erosion Control Application Checklist
- Erosion Control Termination Notice

With respect to the General Permit Conditions, the City of Manitowoc Construction Site Erosion Control Ordinance exhibits the following:

- Appears to meet or exceed the requirements identified in the General Permit for Applicability and Jurisdiction (Section 2.4.1.1).
- Appears to require updating to reflect current WDNR erosion and sediment control criteria, standards and specifications per General Permit Section 2.4.1.2 (specifically, removal of the reference to the WDNR's former Wisconsin Construction Site BMP Handbook AKA the "Blue Book" and referencing the WDNR's new website address for criteria, standards, and specifications).
- Appears to require updating to (or evidence of comparative conformance with) NR 151.11 and 151.23 Wis. Adm. Code performance standards per General Permit Section 2.4.1.3.
- May require updating to meet the erosion and sediment control plan requirements contained in NR 216.46 Wis. Adm. Code per General Permit Section 2.4.1.4.
- Appears to include adequate inspection authority per General Permit Section 2.4.1.5.
- Appears to include adequate requirements for waste and material disposal (management) pursuant to Section 2.4.1.6 of the General Permit.

- Current City of Manitowoc procedures for construction site inspection and enforcement of erosion control measures appear to be met for identification of responsible staff, inspection frequency, site inspection documentation, and an enforcement mechanism for compliance as outlined in General Permit Section 2.4.2.
- The City of Manitowoc has current procedures for receipt and consideration of information submitted by the public as required by Section 2.4.3 of the General Permit.

Measurable goals of this effort include:

- Meet WDNR Compliance Schedule:
 - Permit coverage date + 18 months: Prepare and submit an updated construction site pollutant control ordinance to WDNR. Submit the proposed construction site inspection and enforcement procedures to WDNR.
 - Permit coverage date + 24 months: Adopt the updated ordinance and implement the inspection and enforcement procedures.

E. Post-construction storm water management

General Permit Condition 2.5 requires that the City of Manitowoc develop, implement, and enforce a program to manage post-construction storm water runoff from new and redeveloped sites.

Currently the City of Manitowoc has the following post-construction storm water management elements in place:

- A Stormwater Management (Post-Construction Storm Water Management) Ordinance (Section 28 of the Manitowoc Municipal Code)
- Decision-making flow chart for municipal staff and contractors
- Erosion Control and Stormwater Management Application
- Stormwater Management Application Checklist
- Stormwater Management Facility Maintenance Agreement
- Wet Detention Pond Inspection form

With respect to the General Permit Conditions, the City of Manitowoc Stormwater Management (Post-Construction Storm Water Management) Ordinance exhibits the following characteristics:

- Appears to meet or exceed the requirements identified in the General Permit for Applicability and Jurisdiction (Section 2.5.1.1).
- Appears to require updating to reflect current WDNR technical standards available on the WDNR web site per General Permit Section 2.4.1.2 (as these supercede the Wisconsin Storm Water Manual as available).
- Appears to meet the 80% and 40% TSS reductions for new development and redevelopment respectively, but may require updating to comply with the other performance standards components of NR 151.12 and 151.24 Wis. Adm. Code per Section 2.5.1.3 of the General Permit.
- May require updating to meet the storm water plan requirements contained in NR 216.47 Wis. Adm. Code per General Permit Section 2.5.1.4.
- Appears to meet the long-term maintenance requirements per Section 2.5.1.5.
- Appears to have adequate established inspection and enforcement authority.

Measurable goals of this effort include:

- Meet WDNR Compliance Schedule:
 - Permit coverage date + 18 months: Prepare and submit an updated post-construction storm water management ordinance to WDNR. Submit the proposed long-term maintenance procedures to WDNR.
 - Permit coverage date + 24 months: Adopt the updated ordinance and implement the maintenance procedures.

- Other Goals:
 - Continue to update and maintain mapping and database of public and private ponds and storm water best management practices annually at a minimum.
 - Develop written procedure for inspection of public and private wet detention ponds and conduct annual inspections at a minimum.

F. Pollution prevention

General Permit Condition 2.6 requires that the City of Manitowoc develop and implement a pollution prevention program for nine (9) distinct areas. The nine areas and current City of Manitowoc practices relevant to each area are indicated below.

1. Routine inspection and maintenance of municipally owned structural storm water management facilities.
 - The City of Manitowoc maintains and updates mapping of all municipally owned (and public) structural facilities.
 - The City conducts regular inspection of each municipal facility at least annually and if possible in both the spring and fall.

2. Routine street sweeping and catch basin cleaning.
 - The City of Manitowoc currently uses mechanical street sweepers to sweep downtown streets two times per week, and the remainder of the City is swept once per week for all curb and gutter areas.
 - The Department of Public Works (DPW) maintains and updates street sweeping routes.
 - Streets are generally swept from 3am to 11am from the months of April through November or as possible due to weather conditions.
 - The City of Manitowoc has a minimum number of catch basins in place throughout the City and cleans them on an as-needed basis.

3. Proper disposal of street sweeping and catch basin cleaning waste.
 - The materials collected during the sweeping process (and inlet/catch basin cleaning) are collected in a contained area of municipal property. Those elements that can be recycled are transported to a compost area. The loads of materials are tracked, but tonnage is not currently monitored.

4. Application of road salt to the minimum amount necessary to maintain public safety.
 - The City of Manitowoc DPW has a written salting operations procedure. Snow plowing and salting routes are maintained by the DPW. Salt use is tracked and quantity of salt used depends on the storm. Salting application is limited to the amount necessary to maintain safety on streets.
 - Sand use with salting has been reduced over time to limit the amount of sediment being applied to streets and therefore reducing the amount of sediment available to wash off into the MS4 and waters of the state.

5. Proper collection and disposal of leaves and grass clippings.
 - The City of Manitowoc DPW conducts 3 collections: spring rakings, summer brush, and leaves & other yard debris in the fall. Residents are required to rake their leaves onto terrace areas and not into the roadway. Grass clippings are not allowed or collected.
 - Leaves are composted at two facilities that are maintained by Manitowoc County.
 - The City's storm water web page generally has information on leaf, brush, and spring collection details as well as the location and times of operation for the two composting sites available to the public.

6. Stormwater pollution prevention planning for municipal garages, storage areas, and other municipal sources of stormwater pollution.
 - The City cooperates with the County in recycling oil and antifreeze in addition to an annual hazardous waste cleanup. The City of Manitowoc also accepts waste oil at the Marina and Fire Department.
 - The City maintains a containment vessel in the harbor for disposal and management of dredge material.
 - Currently no detailed storm water pollution prevention plans are in place for municipal garages or other areas.
 - The parks department maintains the beaches.

7. Application of lawn and garden fertilizers on municipally controlled properties, with pervious surfaces over 5 acres each, in accordance with a site-specific nutrient application schedule based on appropriate soil tests.
 - The City does not use fertilizers on municipal properties at this time.

8. Education of appropriate municipal and other personnel involved in implementing this program.
 - The City maintains an internal staff newsletter to educate staff on current topics/issues including storm water-related subjects and has a training budget for external training of staff.

9. Measures to reduce municipal sources of storm water contamination within source water protection areas.
 - The City's comprehensive storm water management program includes components to reduce non-point source pollution in storm water runoff and improve the water quality of all receiving waters.

Measurable goals of this effort include:

- Meet WDNR Compliance Schedule:
 - Permit coverage date + 24 months: Submit proposed pollution prevention program to WDNR.
 - Permit coverage date + 30 months: Implement the pollution prevention program.

- Meet WDNR Stormwater Quality Management Goal:
 - Permit coverage date + 24 months: Complete an evaluation of flood control structures, assess compliance, and submit results to WDNR.