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Notice of Intent to Apply for Coverage Under MS4 General Permit

JUN - 9 2006 Form 3400-191 (R 3/06)

Notice: This application is authorized by s. 283.37, Wis. Stats., and chs. NR 151 and 216, Wis. Adm. Code. Personally identifiable information on this form may be used for other program purposes and may be made available to requestors under Wisconsin's Public Records laws and be posted on the Department's internet site.

BUREAU OF WATERSHED MGMT

Instructions: Complete the following for all permit applications. If additional space is needed to respond to a question, attach additional pages. Provide descriptions below that explain the program activities that you expect to develop and implement to comply with the Municipal Separate Storm Sewer System (MS4) general permit (<http://dnr.wi.gov/org/water/wm/nps/stormwater/muni.htm>). Section 3 of the MS4 general permit contains the compliance schedules that direct when the individual program activities need to be developed and submitted to the Department for review. The detailed programs that are developed and submitted to the Department for review may deviate from the program activities described below if necessary. The descriptions provided below are necessary for the Department to verify that the municipality's program activities comply with the permit.

Section I: Applicant Information

Name of Municipality
City of Superior

Mailing Address 51 East First Street	City Superior	State WI	Postal Code 54880
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County(s) in which Applicant is located Douglas	Type of Municipality: (check one) <input type="checkbox"/> County <input checked="" type="checkbox"/> City <input type="checkbox"/> Village <input type="checkbox"/> Town <input type="checkbox"/> Other (specify)
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Section II: Local Contact Information (check one):

Name of Municipal Contact Person Diane R. Thompson	Title Technical Coordinator
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Mailing Address 51 East First Street	City Superior	State WI	Postal Code 54880
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E-mail address thompsond@ci.superior.wi.us	Telephone Number (include area code) 715-394-0392 ext. 131	Fax Number (include area code) 715-394-0406
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Section III: Water Quality Concerns

Yes	No	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Does any part of the MS4 discharge to an outstanding resource water (ORW) or exceptional resource water (ERW) listed under s. NR 102.10 or 102.11, Wis. Adm. Code? (An unofficial list of ORWs and ERWs may be found on the Department's Internet site at: http://dnr.wi.gov/org/water/wm/wqs/)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Does any part of the MS4 discharge to an impaired waterbody listed in accordance with section 303(d)(1) of the federal Clean Water Act, 33 USC § 1313(d)(1)(C)? (A list of Wisconsin impaired waterbodies may be found on the Department's Internet site at: http://dnr.wi.gov/org/water/wm/wqs/303d/303d.html)

Section IV: Area and Population Within the MS4

Yes	No	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is the MS4 within an "Urbanized Area" as defined by U.S. EPA? (See http://www.epa.gov/npdes/pubs/fact2-2.pdf)

If no, skip the rest of this section and continue to Section V. If yes, estimate the area served by and the population within the MS4 in an Urbanized Area (UA).

(Urbanized Area maps are available on the EPA web site at: <http://cfpub1.epa.gov/npdes/stormwater/urbanmaps.cfm>)

Total municipal area (in square miles): 37	Total municipal population (in year 2000): 27368
MS4 service area within Urbanized Area (in square miles): 35	Municipal population within Urbanized Area (in year 2000): 26031

Section V: Potential Permit Exemption

Yes	No	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Section NR 216.023, Wis. Adm. Code, allows certain MS4s that have less than 1000 people residing in an urbanized area to be waived from having to obtain municipal storm water permit coverage.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Do you believe that the MS4 may be eligible for this potential exemption?

Section VI: Summary of Municipal Storm Water Program Activities

Describe the programs or activities the municipality is doing or will do to comply with the requirements of the MS4 general permit. Attach additional pages if necessary.

A. Public Education and Outreach

Describe the public education and outreach program activities that the municipality will implement to comply with section 2.1 of the MS4 general permit.

The City of Superior has been active in public education and outreach for several years. Some of our recent activities include:

- Storm sewer and combined sewer inlet stenciling with every fifth grade class in the City. Hundreds of students are currently painting "Dump No Waste – Drains to Lake" near inlet openings and placing door hangers at nearby homes to help explain the importance of preventing stormwater pollution. This project was also organized in 2001.
- Beach sweeps with all sixth grade classes in the City at Wisconsin Point. Four stations are provided for the students with the City organizing the beach sweep station. Three other stations are provided by partners who present on topics ranging from weather to macroinvertebrates. In addition, beach sweeps are often conducted by the high school honor society with our assistance.
- Wastewater treatment facility tours and educational activities are provided for all interested elementary schools. Every spring the City pays to bus students to the WWTP to learn how wastewater is treated before it enters the lake and what they can do to conserve water and prevent pollution. The tour includes an interactive visual educational experience showing a water drop getting dirty by everyday activities and the cleanup steps that occur at our treatment plant.
- Rain garden demonstration activities. Six gardens have been installed at the wastewater treatment plant and the public planted two of them during specially designed workshops. Five rain gardens are being installed this spring at the middle school. Students from five sixth-grade classes have planned, designed, dug, remediated soil, and grown plants from seeds collected from the treatment plant gardens. These and additional purchased native plants will be planted this June. Barker's Island, a popular local tourist attraction has been undergoing extensive remodeling, part of which included redesigning the parking lot so the flow is all directed into a central rain garden. An interpretative sign is being designed and will be installed this summer. Also, we will be presenting a 2-hour rain garden workshop during the annual MN Lakes and Rivers Conference in Duluth September 7-9, 2006 at the DECC.
- Rain barrel workshops. Hundreds of people have attended dozens of workshops, conducted either at various City facilities, local garden clubs, a watershed festival, the University of Wisconsin, Superior, etc. At these workshops participants view a PowerPoint presentation on stormwater pollution and then assemble their barrels by each attaching the spigots and overflows. The City purchased approximately 1000 recycled barrels, all of the hardware, and made the necessary modifications such as drilling holes and attaching screens.
- Stream monitoring, both on our own to gather data, and partnering with UWS and Water Action Volunteers to train local groups of volunteers. The City began sampling last year and has periodically sampled 13 sites on nine streams in the City of Superior. Parameters include turbidity, pH, temperature, dissolved oxygen, fecal coliform, total suspended solids, and phosphorus. Two citizen workshops were held this spring at UWS with interested people from Superior to Ashland. Workshop attendees were given hands-on instruction following the Water Action Volunteer Citizen Monitoring protocols.
- River cleanups along the St. Louis River and Newton Creek. The St. Louis River Citizens Action Committee (SLRCAC), a local group of which the City is a charter member, conducts annual cleanups along the St. Louis River. This years cleanup was conducted in the Superior Municipal Forest and items collected included sofas, televisions, furniture, carpets, a refrigerator, car parts, dozens of tires (most of which were pulled out of the water), etc. Volunteers piled all the garbage in a parking lot and City crews disposed of everything properly the following Monday. The Murphy Oil Citizen Advisory Panel, another City partner, planned a concurrent cleanup of Newton Creek. This was the first annual cleanup conducted by this group.
- River Rendezvous Carnival held March 2006 was an educational experience for the entire family. The City hosted this event at the local high school in celebration of the 10th anniversary of the SLRCAC and over 200 people attended. Activities included water-based games such as fishpond, lily pad cupcake walk, casting games, stream walk, and the electric river. Partners such as Sea Grant, Douglas County Health Dept, Coast Guard, and Great Lakes Aquarium came with hands on activities and local businesses donated funds and door prizes. A magician provided an entertaining finale with a water stewardship theme. There has been interest in repeating this activity every other year.
- Other public outreach and education activities include: a pollution prevention website, <http://www.ci.superior.wi.us/publicwks/wastewater/P2index.htm>; advertisements placed in local papers; 3 permanent oak display cabinets and tabletop display boards which are taken to fairs, expos, meetings, and conferences covering

such topics as: "What is a Watershed," "Stormwater Management," "What is Stormwater Pollution," Rain Barrels and Gardens," "Lawn and Garden Chemicals," "Dioxin/Burn Barrels," "Recycling; Household Mercury," and "Mercury in Fish."

The Regional Stormwater Protection Team (RSPT) was formed by MS4s from around the area and the City is a charter member. RSPT's mission is to protect and enhance the region's shared water resources through stormwater pollution prevention by providing coordinated educational programs and technical assistance. Team members meet and identify watershed information/education needs, effective messages and delivery formats. Messages address watershed awareness, erosion and sediment, salt, lawn chemicals, dumping into inlets and waterways, littering and impervious surface issues. As a group we will address many of the public education requirements under Phase II. Specific RSPT activities include:

- o The RSPT prepared and aired a series of public service announcements in the fall of 2004 and spring of 2005. These 30-second spots stress the individual's role in protecting our waters and the link between individual activities and the waters. During the spring campaign, 191 paid spots and 204 match spots appeared on television over four networks and 154 paid spots and 48 match spots aired on radio over three stations during late March, April and May. The RSPT group has received grant funding to continue the PSAs in spring and summer 2006.
- o RSPT created a mascot, Rex. This life size dog costume is used at regional events. The dog carries and distributes "Mutt Mitts" for use by those walking dogs.
- o In June 2005, RSPT hosted a Watershed festival. The festival targeted a general audience and offered activities for children and adults. The event was carefully designed to attract a general audience as opposed to the already involved public. Booths at the event featured agency, non-profit and local businesses providing environmental services. Approximately 500 people attended the six-hour event. In addition the RSPT group brought in a national environmental entertainer that made appearances at the festival and at five schools prior to the event. A detailed planning document was developed as part of the effort and is available for use on future activities and for others interested in the process.
- o The website www.lakesuperiorstreams.org features stormwater information about our region and partners. The web site provides excellent educational materials and is averaging 60,000 hits per month. In 2005 a construction toolkit, links to data and additional regional information were added. The web site is collecting real time data from 4 creeks in Duluth. The site incorporates information for much of the Lake Superior basin making it an invaluable tool for students wanting to learn more about the waters and habitats of the region.

To comply with requirement 2.1 the City of Superior will develop a comprehensive Public Education, Involvement, and Relations (PEIR) Program. The PEIR Program will be designed to increase the awareness of stormwater pollution impacts on waters of the state to encourage changes in public behavior and to reduce such impacts. Procedures will be established to notify the public of activities required by this permit and to encourage input and participation from the public regarding these activities. The City is finalizing development of a Stormwater Utility to fund these activities. This program shall include measurable goals for public education, involvement and participation and will comply with all applicable state and local public notice requirements.

In addition to the types of activities already described, the PEIR Program will include plans for:

- Promoting detection and elimination of illicit discharges and water quality impacts associated with such discharges from municipal separate storm sewer systems.
- Informing and educating the public about the proper management of materials that may cause stormwater pollution from sources including automobiles, pet waste, household hazardous waste and household practices.
- Promoting beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides.
- Promoting the management of streambanks and shorelines by riparian landowners to minimize erosion and restore and enhance the ecological value of waterways.
- Promoting infiltration of residential stormwater runoff from rooftop downspouts, driveways and sidewalks.
- Informing and where appropriate educating those responsible for the design, installation, and maintenance of construction site erosion control practices and stormwater management facilities on how to design, install and maintain the practices.
- Identifying businesses and activities that may pose a stormwater contamination concern, and where appropriate, educating specific audiences on methods of stormwater pollution prevention.
- Promoting environmentally sensitive land development designs by developers and designers.

The program will define measurable goals for various public education and outreach efforts. Goals may include:

- Number of storm drains stenciled
- Number of students/classrooms/schools participating in project
- Number of door hangers placed by students
- Number of public events used to distribute literature
- Number of handouts, fliers, brochures, etc distributed
- Number of workshops/conferences/training events given
- Number of attendees at workshop/festival/rendezvous
- Number of advertisements in paper, on radio, TV

B. Public Involvement and Participation

Describe the public involvement and participation program activities that the municipality will promote to comply with section 2.2 of the MS4 general permit.

The City of Superior has been actively encouraging public involvement and participation in numerous programs and projects. Some of our recent activities that exemplify this include:

- An advisory committee was developed after citizen concerns were raised in relation to basement backups after a 100 year storm event. The Stormwater Flood Control Pilot Project (SFCPP) was developed as a cost effective approach to resolving basement flooding issues facing the citizens of Superior. (See Section 2.3 for more details on the SFCPP.)
- A Water Quality Advisory Committee was organized to address the various options available to the City to achieve compliance with the new stormwater regulations. This committee assisted the City in developing a Stormwater Utility and a rate structure that will provide adequate funding to develop and maintain the required programs.
- Workshops for rain barrels, rain gardens, becoming mercury-free, composting, recycling, citizen monitoring are advertised in the local paper to encourage participation. Press releases, fliers, brochures, etc. are also used to get the word out to interested parties.

The City of Superior complies with all applicable state and local public notice requirements.

To comply with requirement 2.2 the City of Superior will develop a comprehensive Public Education, Involvement, and Relations (PEIR) Program. The PEIR Program will be designed to increase the awareness of stormwater pollution impacts on waters of the state to encourage changes in public behavior and to reduce such impacts. Procedures will be established to notify the public of activities required by this permit and to encourage input and participation from the public regarding these activities. The City is finalizing development of a Stormwater Utility to fund these activities. This program shall include measurable goals for public education, involvement and participation and will comply with all applicable state and local public notice requirements.

In addition to the types of activities already described, the PEIR Program will include plans for:

- We will develop web pages to inform the public about activities required under this permit.
- We will hold an annual meeting for the general public and record all comments to enable us to review and take them under advisement.
- We will invite the city council, interest groups and the general public to review and comment on the annual report, which will contain:
 - oStatus of implementing the permit requirements
 - oStatus of meeting measurable program goals
 - oCompliance with permit schedules
 - oAnnual expenditures and budget for the reporting year
 - oBudget for the next year
 - oSummary of inspections and enforcement actions
 - oIdentification of any known water quality improvements or degradation
 - oStatement or resolution that the city council has reviewed or been apprised of the content of the annual report

The program will define measurable goals for public involvement and participation. Goals may include:

- Number of public meetings
- Number of people in attendance
- Number of comments on program, budget
- Number of comments on annual report

- Number of requests for information from people calling in
- Number of requests for information generated through the website

C. Illicit Discharge Detection & Elimination

Describe the illicit discharge detection and elimination program authority and activities that the municipality will develop and implement to comply with section 2.3 of the MS4 general permit.

The City of Superior has an illicit discharge program for homeowner's sanitary sewers called the Stormwater Flood Control Pilot Project (SFCPP). It is a comprehensive cost-sharing program intended to prevent stormwater from entering the sanitary sewer system from downspouts, yard drains and sump pumps, thereby helping prevent storm and sanitary wastewater from flooding citizens' basements. This program includes:

- Prequalification inspection to evaluate each site for surface water flow characteristics to identify causes of household flooding and to provide risk-reduction recommendations to homeowners
- Delineation and characterization of impervious surfaces, slopes, elevation, landscaping, soil characteristics, lateral pipe integrity, sump pump size and efficiency, and roof, foundation, yard and other drains
- Assurances of lateral integrity and/or repair/replacement, sump pump and house downspout daylighting rather than discharge into the sewer system, and a backflow valve option, if appropriate

Review and revision of City ordinances to allow precise management of city surface water is underway.

A thorough review and survey of the City sewer system is proposed to identify weaknesses and potential trouble spots within the sewers of the City. The survey involves complete mapping and inventory of the sewer system in a GIS format. Project specifications are being developed and implemented.

To comply with requirement 2.3 the City of Superior will develop, implement and enforce a program to detect and remove illicit connections and discharges. We will use "Illicit Discharge Detection and Elimination A Guidance Manual for Program Development and Technical Assessments" by the Center for Watershed Protection in developing our program. The program will include an ordinance or other regulatory mechanism to prevent and eliminate illicit discharges and connections to the MS4, initial field screening at all major outfalls, on-going field screening of outfalls, and procedures for responding to known or suspected illicit discharges.

Our regulatory mechanism will:

- Prohibit the discharge, spilling or dumping of non-storm water substances or materials.
- Identify non-storm water discharges or flows that are not considered illicit discharges, such as water line flushing, landscape irrigation, diverted stream flows, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, fire fighting and discharges authorized under a WPDES permit unless identified by the permittee as significant source of pollutants to waters of the state.
- Establish inspection and enforcement authority.

Initial field screening will include a description of visual observations including color, odor, turbidity, oil sheen or surface scum, flow rate and any other relevant observations regarding the potential presence of non-storm water discharges or illicit dumping. If flow is observed, sampling for pH, total chlorine, total copper, total phenol and detergents will be conducted.

On-going dry weather field screening of outfalls during the term of the permit. Outfalls that will be evaluated on an on-going basis and the field screening frequency will be identified. Consideration will be given to hydrological conditions, total drainage area of the site, population density of the site, traffic density, age of the structures or buildings in the area, history of the area and land use types. A description of this on-going field screening program will be submitted to the Department in accordance with section 3.3.4.

Procedures for responding to known or suspected illicit discharges. At a minimum, procedures will be established for:

- Investigating areas that have a reasonable potential for containing illicit discharges or other sources of non-storm water discharges.
- Responding to spills that discharge into and/or from the City including tracking and locating the source of the spill if unknown.
- Preventing and containing spills that may discharge into or are already within the MS4.
- Notifying the Department immediately in accordance with ch. NR 706, Wis. Adm. Code, in the event that the

permittee identifies a spill or release of a hazardous substance, which has resulted or may result in the discharge of pollutants into waters of the state. The Department will be notified via the 24-hour toll free spill hotline at 1-800-943-0003. The City of Superior will cooperate with the Department in efforts to investigate and prevent such discharges from polluting waters of the state.

To the maximum extent practicable, eliminating leakage from sanitary conveyance systems into the MS4.

Providing the Department with advance notice of the time and location of dye testing within a MS4.

The City of Superior will take appropriate action to remove illicit discharges from its MS4 system as soon as possible. If it will take more than 30 days to remove an illicit connection, the Department will be contacted to discuss an appropriate action and/or timeframe for removal.

The name, title and phone number of the individual(s) responsible for responding to reports of illicit discharges and spills will be included in the illicit discharge response procedure and submitted to the Department.

The program will define measurable goals for illicit discharge detection and elimination. Goals may include:

Number of residents reporting suspected illicit discharges

·Number of public employees reporting suspected illicit discharges

·Number of major outfalls inspected

·Number of dry weather flows sampled

·Number of illicit discharges eliminated

D. Construction Site Pollution Control

Describe the construction site pollutant control program authority and activities that the municipality will develop and implement to comply with section 2.4 of the MS4 general permit.

The City of Superior requires erosion control best management practices (BMPs) that will reduce the amount of sediment and other pollutants leaving construction sites during land development or land disturbing activities.

Our City Code requires a permit from the city and approval of an erosion control plan for areas with one acre or more of land disturbance. The plan must include:

1. Existing site map. A map of existing site conditions on a scale of at least one inch equals 100 feet showing the site and immediately adjacent areas extending at least 200 feet in each direction:
 - 1a. Site boundaries and adjacent lands which accurately identify site location;
 - 1b. Lakes, streams, wet lands, channels, ditches and other watercourses on and immediately adjacent to the site;
 - 1c. 100-year floodplains, flood fringes and floodways;
 - 1d. Location of the predominant soil types;
 - 1e. Vegetative cover;
 - 1f. Location and dimensions of storm water drainage systems and natural drainage patterns on and immediately adjacent to the site and the size, slope and land cover of up-slope drainage areas, peak discharge, velocities, direction and destination of flows;
 - 1g. Locations and dimensions of utilities, structures, roads, highways and paving;
 - 1h. Site topography at a contour interval not to exceed two feet; and
 - 1i. Name, address and daytime telephone number of the applicant and the person responsible for maintenance of best management practices.
2. Plan of final site conditions. A plan of final site conditions on the same scale as the existing site map showing the site changes.
3. Site construction plan. A site construction plan including:
 - 3a. Locations and dimensions of all proposed land development and land disturbing activities;
 - 3b. Locations and dimensions of all temporary soil or dirt stockpiles;
 - 3c. Locations and dimensions of all best management practices necessary to meet the requirements of this article;
 - 3d. Schedule of anticipated starting and completion date of each land development or land disturbing activity including the installation of best management practices needed to meet the requirements of this article;
 - 3e. Provisions for maintenance of best management practices during construction; and
 - 3f. Description of vegetation and other materials to be used to stabilize the site including a schedule for installation and maintenance.

The code requires the following erosion control activities:

(1) Site dewatering. Water pumped from the site shall be treated by sediment basins or other appropriate BMPs. Water

may not be discharged in a manner that causes erosion by the site, adjacent sites or receiving channels.

(2) Waste and material disposal. All waste and unused building materials (including garbage, debris, cleaning wastes, wastewater, toxic materials or hazardous materials) shall be properly disposed of and not allowed to be carried off-site by runoff or wind.

(3) Tracking. Each site shall have graveled roads, access drives and parking areas of sufficient width and length to prevent sediment from being tracked onto public or private roadways. Any sediment reaching a public or private road shall be removed by street cleaning before the end of each workday. Flushing may not be used unless sediment will be controlled by a sediment basin or other appropriate BMP.

(4) Drain inlet protection. All storm drain inlets shall be protected with a straw bale, filter fabric, or equivalent barrier as specified in the BMP handbook or approved by the director of public works or his or her designee.

(5) Sediment cleanup. All off-site sediment deposits occurring as a result of a storm event shall be cleaned up by the end of the next workday. All other off-site sediment deposits occurring as a result of construction activities shall be cleaned up by the end of the workday.

(6) Site erosion control. The following criteria, subsections (b)(6)a through (b)(6)e, apply only to land development or land disturbing activities that result in runoff leaving the site.

(6) a. Channelized runoff from adjacent areas passing through the site shall be diverted around disturbed areas, if practical. Otherwise, the channel shall be protected as described below. Sheet-flow runoff from adjacent areas greater than 10,000 square feet in area shall also be diverted around disturbed areas unless shown to have resultant runoff velocities of less than 0.5 foot/second across the disturbed area for the ten-year, 24-hour storm as defined in the BMP handbook. Diverted runoff shall be conveyed in a manner that will not erode the conveyance and receiving channels. For allowable velocities in different types of channels, soil conservation service guidelines shall be followed.

(6) b. All activities on the site shall be conducted in a logical sequence to minimize the area of bare soil exposed at any one time.

(6) c. Runoff from the entire disturbed area on the site shall be controlled by meeting either subsections (b)(6)1 and 2 or (b)(6)1 and 3 of this section.

(6) c 1. All disturbed ground left inactive for seven or more days shall be stabilized by temporary or permanent seeding, temporary or permanent seeding and mulching, sodding, covering with tarps, or equivalent best management practices. If temporary seeding is used, a permanent cover shall also be required as part of the final site stabilization. Seeding or sodding shall be conducted as specified in the BMP handbook or by the building inspector. Variances from the requirements of this subsection may be granted by the building inspector upon application, but only if the failure to comply is due to extended periods of rain or other construction delays beyond the control of the responsible party.

(6) c 2. For sites with ten or more acres disturbed at one time, or if a channel originates in the disturbed area, one or more sediment basins shall be constructed. Each sediment basin shall be designed and constructed as specified in the BMP handbook.

(6) c 3. For sites with less than ten acres disturbed at one time, filter fences, straw bales, or equivalent best management practices shall be placed along all side-slope and down-slope sides of the site. If a channel or area of concentrated runoff passes through the site, filter fences shall be placed along the channel edges to reduce sediment reaching the channel.

(6) d. Sites with slopes of 12 percent or more any require additional or different controls than listed in paragraph (b)(6)c of this section. Requirements for such slopes shall be as specified by the director of public works or his or her designee.

(6) e. Wherever possible, soil or dirt storage piles shall be located 25 feet from any down-slope road, lake, stream, wetland, or drainage channel. Straw bale or filter fabric fences shall be placed on the down slope side of the piles. If remaining for more than 30 days, piles shall be stabilized by mulching, vegetative cover, tarps or other means. The director of public works or his or her designee may require additional or different best management practices for piles located closer than 25 feet to a road, lake, stream, wetland or drainage channel.

(6) f. When the disturbed area has been stabilized by permanent vegetation or other means, temporary best management practices such as filter fabric fences, straw bales, and sediment traps shall be removed.

To comply with requirement 2.4 the City of Superior will be developing a comprehensive pre and post construction program to reduce the discharge of sediment and construction materials from construction sites and to require control of the quality of discharges from areas of new development and redevelopment after construction is completed. The program will include new or revised ordinances, inspection and enforcement procedures and authority, measurable goals, and ways to address public input on the program.

City ordinances will be reviewed to assure compliance with the most recent NR 216 and NR 151 requirements and the

Stormwater Management Permit. City Code construction site standards currently reference the Wisconsin BMP Handbook. Ordinance language will be modified to reference WDNR Technical Standards and incorporate all new or changed requirements.

The City will also evaluate whether to apply for an Authorized Local Program when it develops the pre and post construction program.

The program will define measurable goals for erosion control. Goals may include:

- Number of erosion control permits issued
- Number of site inspections
- Number of complaints received by residents
- Number of meetings held with developers
- Number of violations issued
- Number of violations per site
- Number of stop work orders issued

E. Post-Construction Site Storm Water Management

Describe the post-construction storm water management program authority and activities that the municipality will develop and implement to comply with section 2.5 of the MS4 general permit.

To comply with requirement 2.5 the City of Superior will be developing a comprehensive pre and post construction program to reduce the discharge of sediment and construction materials from construction sites and to require control of the quality of discharges from areas of new development and redevelopment after construction is completed. The program will include new or revised ordinances; design criteria, standards and specifications equivalent to technical standards issued by the WDNR; inspection and enforcement procedures and authority; measurable goals; and ways to address public input on the program.

City ordinances will be reviewed to assure compliance with the most recent NR216 and NR 151 requirements and the Stormwater Management Permit. City Code construction site standards currently reference the Wisconsin BMP Handbook. Ordinance language will be modified to reference WDNR Technical Standards and incorporate all new or changed requirements.

F. Pollution Prevention

Describe the pollution prevention program activities that the municipality will implement to comply with section 2.6 of the MS4 general permit.

The City of Superior has a comprehensive pollution prevention program that addresses many pollutants. We will expand the program to include specific requirements from the permit. Current activities include:

- Adopt a Street/Trail, Adopt a Garden, Adopt a Park Programs are a way for groups to help in park cleanup and get recognition. This consists mostly of litter removal and flower care.
- The Tribute Tree Program is a way for a person or organization to give a lasting, living gift of a Maple, Linden, Ash, or Japanese Lilac Tree.
- The City currently has a pesticide ordinance in place that prohibits the use of pesticides on municipally owned land except with special permission by the Common Council. There are two occasions where the Council gave permission for pesticide use: 1) In the case of City ball fields, one application of pesticide in the fall of the year after all play is complete; and 2) at City wetland mitigation sites to prohibit the growth of invasive species.
- The National Arbor Day Foundation designated the City as a Tree City USA for meeting tree care criteria. We have a Strategic Action Plan for the Urban Forest of the City of Superior. This plan calls for 24 separate strategies designed to accomplish the following goals: Increase tree stocking levels; Provide Education; Monitor the tree asset; and Maintain the tree asset. We have completed approximately 17 of the 24 strategies. We have an annual allocation of \$5000 for tree planting, which provides 100 boulevard trees each year.
- A Buffer zone ordinance requires vegetation around parking lots that abut residential properties
- Grass clippings, woody branches, etc. are accepted at the composting site at the landfill and are collected annually during the curbside pickup. All materials created at the compost facility are available for landscape reuse.
- Every year during Pollution Prevention Week and Earth Week, the treatment plant invites all area fifth and sixth-graders to visit the plant and hear about stormwater problems. Hundreds of students and teachers visit the plant where they hear about stormwater and the run-off problems that it causes. With games, PowerPoint Presentations, hands-on Enviroscape displays and tours, students learned about the problems with keeping our water clean.
- The City has created several demonstration rain gardens on the WWTP grounds. Different native plant species were planted at each site. Two rain garden workshops were held with attendees planting a garden during the class. We have been asked to conduct a rain garden workshop as part of the MN Lakes and Rivers Conference at the DECC in Sept.
- A rain-barrel program has been available to all area residents for several years. Rain barrel workshops are offered where homeowners actually put together their own rain barrel.
- Partnering with the middle school, we are assisting 5 sixth-grade classes in planning, designing, digging, planting rain gardens of approximately 150 square feet. Students assisted in growing their own plants from seeds, used a budget to buy supplemental plants, remediation clay soil with sand gravel and peat
- We have partnered with many volunteer organizations such as Regional Stormwater Protection Team and St. Louis River Citizens Action Committee to promote environmental stewardship. These groups organize streambank cleanups and watershed festivals, etc.
- We have a comprehensive mercury reduction program, which includes public education; thermometer, thermostat, switch, bulb, etc. recycling programs, outreach with Murphy Oil and the shipping industry and development of the WDNR Mercury PMP Guidance Manual.

To comply with requirement 2.6 the City of Superior will develop and implement a pollution prevention program that establishes measurable goals for pollution prevention. The program will include:

- Routine inspection and maintenance of municipally owned or operated structural storm water management facilities to maintain their pollutant removal operating efficiency.
- Routine street sweeping and cleaning of catch basins with sumps where appropriate.
- Proper disposal of street sweeping and catch basin cleaning waste.
- No more road salt or other deicers will be applied than necessary to maintain public safety.
- Proper management of leaves/grass clippings, which may include on-site beneficial reuse as opposed to collection.
- Storm water pollution prevention planning for municipal garages, storage areas and other sources of storm water pollution from municipal facilities.
- 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.
- Education of appropriate municipal and other personnel involved in implementing this program.
- Measures to reduce municipal sources of storm water contamination within source water protection areas.

Section VII: Certification

I hereby certify that I am an authorized representative of the municipality that is the subject of this application for general permit coverage, and that the information provided is true and complete, to the best of my knowledge. I understand that Wisconsin law provides severe penalties for submitting false information.

Authorized Representative Name Diane R. Thompson		Title Technical Coordinator
Signature <i>Diane R. Thompson</i>		Date Signed 6/7/06
E-mail address thompsond@ci.superior.wi.us	Telephone Number (include area code) 715-394-0392 ext. 131	Fax Number (include area code) 715-394-0406

Return this completed form to:
 Wisconsin Department of Natural Resources
 Storm Water Program – WT/2
 PO Box 7921
 Madison, WI 53707-7921