

# NPDES-MS4 Stormwater Management Program

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City of Topeka, Kansas

*Water Pollution Control Division  
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Topeka, KS 66616*

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## SECTION 1: INTRODUCTION

This document serves as the City of Topeka’s Stormwater Management Program document. It presents the activities and functions that comprise Topeka’s program of activities developed and implemented to comply with requirements put forth in the Kansas Water Pollution Control Municipal Separate Storm Sewer System Permit and Authorization to Discharge under the National Pollutant Discharge Elimination System, Kansas Permit No.: M-KS72-SO01 and Federal Permit No.: KS0093327, effective August 1, 2014, otherwise referred to as the “Permit”.

### 1.1 Purpose and Scope

The purpose of this Stormwater Management Program (SMP) document is to outline the best management practices (BMPs) that are implemented by the City of Topeka to satisfy the minimum control measures (MCMs) and other required program elements established in the Permit. The BMPs are designed to reduce the discharge of pollutants from the municipal separate storm sewer system (MS4) to the “maximum extent practicable” to protect water quality and to satisfy the appropriate water quality requirements of the Clean Water Act. This SMP document describes the BMPs used by Topeka to operate the functional areas of the SMP. These functional areas are listed in Table 1.

Table 1. Functional Areas of the Stormwater Management Program	
Public Education and Outreach (MCM 1)	Monitoring Industrial and High Risk Runoff
Public Involvement and Participation (MCM 2)	Total Maximum Daily Load (TMDL) Regulated Pollutants
Illicit Discharge Detection and Elimination (MCM 3)	Primary Responsible Parties
Construction Site Stormwater Runoff Control (MCM 4)	Monitoring Requirements
Post-Construction Stormwater Management in New Development and Redevelopment Projects (MCM 5)	Reporting
Pollution Prevention/Good Housekeeping for Municipal Operations (MCM 6)	Modifications to BMPs and SMP

## SECTION 2: MINIMUM CONTROL MEASURES

This section provides information required by Part 1 Section C of the Permit entitled “Six Minimum Control Measures”. This section is subcategorized into six subsections containing the required information for each of the six MCMs in the Permit. The BMPs developed and implemented to comply with the Permit’s requirements are listed within each subsection. The following required information is provided for each BMP:

- Title
- Description
- Measurable Goal
- Frequency
- Responsible Department
- TMDL Regulated Pollutant BMP

The TMDL Regulated Pollutant BMP information indicates the BMPs use (or not) to address the specifically identified pollutants included in the Permit’s TMDL Table (Part II of the Permit).

## 2.1 Public Education and Outreach

Topeka is required to implement a public education and outreach campaign. The focus of the program, as defined in Part 1 Section C Item 1 of the Permit, focuses on impacts of stormwater discharges to water bodies and the steps the public can take to reduce pollutants in stormwater runoff. Permittees are given substantial flexibility in determining and implementing a suite of activities that comprise their public education and outreach program.

Topeka’s list of BMPs to fulfill the Public Education and Outreach (PEO) MCM are described below.

<b>Title:</b>	<b>PEO1 – Stormwater Videos and Graphics</b>
<b>Description:</b>	Video messages and/or graphics will be developed by the City for use on Cable Channel 4 or other video outlets for community distribution. This activity will take the form of periodic repeating video presentations or graphics informing citizens of the importance of preventing stormwater pollution and individual actions citizens can take to reduce their impact on stormwater.
<b>Measurable Goal:</b>	A repeating video and/or graphic will run at least quarterly (four times per year). Presentations/messages and graphics will be documented along with the media used and its duration, and reported in the annual report.
<b>Frequency:</b>	Once each quarter
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

<b>Title:</b>	<b>PEO2 - Stormwater Quality Brochures</b>
<b>Description:</b>	Brochures that provide educational information on stormwater quality and pollution prevention will be distributed by the City using utility bill inserts, the City website, or through other appropriate methods of communication.
<b>Measurable Goal:</b>	A minimum of 200 brochures will be distributed each year. The number distributed during the year will be included with the annual report.
<b>Frequency:</b>	Annual
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes –Sediment, Nutrients, Bacteria

<b>Title:</b>	<b>PEO3 – Stormwater Webpage</b>
<b>Description:</b>	A webpage on stormwater quality will be maintained by the City to provide educational information on stormwater quality, pollution prevention, and other material or links relevant to the City’s SMP.
<b>Measurable Goal:</b>	Webpage content, including a list of any new content added during the permit year (if any), will be documented annually. This information will be provided in the annual report.

<b>Frequency:</b>	Ongoing throughout the permit year
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

<b>Title:</b>	<b>PEO4 - Grab Bag Educational Programs and Events</b>
<b>Description:</b>	The City will facilitate, participate, or support educational opportunities for stormwater pollution prevention, water conservation, and water quality education throughout the year as resources allow. Potential events where this activity may occur include, but are not limited to: Topeka Water Festival, Earth Day, Pollinator Palooza, Topeka employee emails, public/private school programs, and other festivals or events.
<b>Measurable Goal:</b>	Facilitation, participation, or support of at least one event annually. Documentation of events, topics presented, and approximate number of people in attendance will be provided in the annual report.
<b>Frequency:</b>	Once annually
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

## 2.2 Public Involvement and Participation

Topeka is required to implement a public involvement and participation program. The focus of the program, as defined in Part 1 Section C Item 1 of the Permit, is to solicit public comment and recommendations about the BMPs and measurable goals utilized by the Topeka to meet Permit requirements. Topeka will comply with all State and local public notice requirements in implementing this program. The City’s list of BMPs to fulfill the Public Education and Outreach (PEO) MCM Public Involvement and Participation (PIP) MCM are described below.

<b>Title:</b>	<b>PIP1 – Public Comment and Input</b>
<b>Description:</b>	Topeka will seek public input on stormwater quality topics or issues that must be considered by the City Council (e.g. stormwater ordinances, stormwater fee actions, and stormwater CIP and Operating budgets, etc.). The public will be given the opportunity to review and comment as part of standard public record and public input procedures.
<b>Measurable Goal:</b>	Copies of public notices (e.g. press releases, website posts, etc.) and documentation of the event will be provided in the annual report.
<b>Frequency:</b>	Intermittent, as relevant issues are considered by City Council
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	No

<b>Title:</b>	<b>PIP2 – Grab Bag Public Involvement Opportunities</b>
<b>Description:</b>	Topeka will seek volunteers from the general public to participate, provide input, or otherwise support certain stormwater quality related activities. The public involvement activity(s) implemented each year will be determined as opportunities are identified. Possible public involvement activities include, but are not limited to, stream trash removal, Jackson Street bioretention cell cleanup, stormwater stakeholder committees, etc.
<b>Measurable Goal:</b>	The City will coordinate at least one volunteer activity annually. Documentation of number or participants, event description, event date and event outcome (e.g. pounds of trash, miles of stream, rain barrels made, etc.) will be provided in the annual report.
<b>Frequency:</b>	Annual
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	No

### 2.3 Illicit Discharge Detection and Elimination

Topeka is required to implement an illicit discharge detection and elimination (IDDE) program. The focus of the program, as defined in Part 1 Section C Item 1 of the Permit, is to detect, identify and eliminate non-stormwater discharges, including illegal disposal, to the MS4. Topeka’s list of BMPs to fulfill the IDDE MCM are described below.

<b>Title:</b>	<b>IDDE1 – IDDE Ordinance</b>
<b>Description:</b>	Topeka will maintain <i>Chapter 13.15 Water Pollution Control</i> of the Topeka Municipal Code, which satisfies the requirement in the NPDES-MS4 Permit for an ordinance to prohibit non-stormwater discharges into the MS4.
<b>Measurable Goal:</b>	Chapter 13.15 will be continuously enforced. Actions taken by Topeka during the permit year to enforce the ordinance will be documented as they occur. As well, changes to the ordinance pertinent to the illicit discharge detection and elimination requirements of the permit will be documented. All such documentation will be kept on file.
<b>Frequency:</b>	Enforcement – Ongoing, throughout the permit year Ordinance update – When deemed necessary
<b>Responsible Dept.</b>	Utilities will enforce the IDDE provisions of Chapter 13.15
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

<b>Title:</b>	<b>IDDE2 – Inspections of Storm Sewer</b>
<b>Description:</b>	Topeka will visually inspect storm sewer pipe throughout the MS4’s service area. This is typically done via closed circuit television (CCTV). Inspections focus on pipe structural integrity, obstructions, and sediment loading. Evidence of illicit connections or discharges will also be targeted. If found, illegal connections or discharges will be investigated with the goal of elimination.
<b>Measurable Goal:</b>	A minimum of 5,000 linear feet of storm sewer pipe will be inspected annually. The actual linear feet of storm sewers inspected will be documented. Actions related to illicit connections or discharges found during elimination will be documented. All such documentation will be kept on file.
<b>Frequency:</b>	Ongoing, in accordance with Topeka’s standard preventative maintenance or to identify or confirm a suspected remedial maintenance need
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Bacteria

<b>Title:</b>	<b>IDDE3 – Inspections of Sanitary Sewers</b>
<b>Description:</b>	Topeka will visually inspect sanitary sewer pipe throughout the MS4’s service area. This is typically done via closed circuit television (CCTV). Inspections focus on pipe structural integrity and obstructions. Evidence of illicit connections or discharges will also be targeted. If found, illegal connections or discharges will be investigated with the goal of elimination.
<b>Measurable Goal:</b>	A minimum of 20,000 linear feet of sanitary sewer pipe will be inspected annually. The actual linear feet of sanitary sewers inspected will be documented. Actions related to illicit connections or discharges found during elimination will be documented. All such documentation will be included in the annual report.
<b>Frequency:</b>	Ongoing, in accordance with Topeka’s standard preventative and corrective maintenance schedule
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Bacteria

<b>Title:</b>	<b>IDDE4 – Storm Sewer System Map Maintenance</b>
<b>Description:</b>	Topeka will maintain a storm sewer collection system map in accordance with permit requirements.
<b>Measurable Goal:</b>	The storm sewer collection system map will be updated annually to account for changes to the storm sewer system that occur during the permit year.
<b>Frequency:</b>	Annual
<b>Responsible Dept.</b>	Public Works

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**TMDL Regulated Pollutant BMP?** Yes – Sediment, Nutrients, Bacteria

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**Title: IDDE5 – Grease Disposal Program**

**Description:** Topeka will monitor local grease disposal activities to track and minimize the discharge of grease to the MS4. Topeka requires that establishments that handle grease (such as restaurants) inspect and report their grease disposal activities regularly. These reports are compared with grease disposal totals documented in grease hauler logs kept by Topeka’s Water Pollution Control (WPC) Division, thus comparing the amount of grease collected by WPC to that reported by local establishments. Discrepancies are investigated with the goal of eliminating grease discharge or dumping.

**Measurable Goal:** Grease total comparison values will be included in the annual report.

**Frequency:** Ongoing, throughout the permit year

**Responsible Dept.** Utilities

**TMDL Regulated Pollutant BMP?** No

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**Title: IDDE6 – SSO Surveillance & Response Program**

**Description:** Topeka will collect samples at twelve stream sites approximately twice per month, weather and stream conditions permitting, for potential sanitary system overflows (SSOs) or illicit discharges. All samples will be analyzed for e-coli. Where analysis results identify a potential illicit discharge, the issue is investigated in accordance with Topeka’s SSO Response standard operating procedure (SOP).  
Topeka will investigate, identify, and implement corrective actions as appropriate for SSOs when they are reported in accordance with the City’s SSO Response SOP. The SOP’s effectiveness will be evaluated annually and it will be updated as needed.

**Measurable Goal:** Sample analysis results are documented, reviewed, and kept on file. The SSO Response SOP will be implemented for 100% of SSOs reported to the City. SSO response activities will be documented and kept on file.

**Frequency:** Stream site sampling performed twice per month, when weather and stream conditions allow sample collection  
SSO Response is performed as needed, as SSOs are reported

**Responsible Dept.** Utilities

**TMDL Regulated Pollutant BMP?** Yes – Bacteria

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<b>Title:</b>	<b>IDDE7 – Outfall Inspections</b>
<b>Description:</b>	Topeka will regularly inspect MS4 outfalls for evidence of illicit discharges. Such evidence, when identified, will be investigated with the goal of identifying and eliminating the source of the discharge, under the relevant authority provided to the City by Chapter 13.15 of Topeka Municipal Code.
<b>Measurable Goal:</b>	A minimum of 250 MS4 outfall inspections will be performed every 2 years. The number of outfalls inspected each year will be included in the annual report.
<b>Frequency:</b>	Bi-annual (Inspection of 250 MS4 outfalls every two years)
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	No

<b>Title:</b>	<b>IDDE8 – Septage and Leachate Collection Program</b>
<b>Description:</b>	Topeka will accept septage and leachate from industries, landfills, portable toilets, and septic tanks at City wastewater treatment facilities to minimize opportunities for discharge of such materials into the MS4.
<b>Measurable Goal:</b>	The amount of septage and leachate collected and treated will be recorded and kept on file.
<b>Frequency:</b>	Ongoing, throughout the permit year
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Bacteria

<b>Title:</b>	<b>IDDE9 – Septic System Inspection Program</b>
<b>Description:</b>	Topeka will develop and maintain an inventory of known septic systems that exist within City limits.  Topeka will investigate 100% of complaints received regarding improper discharge or surfacing sewage related to septic system failure.
<b>Measurable Goal:</b>	Develop septic system inventory in 2018.  Documentation on complaints pertaining to surfacing sewage from septic systems and their resolution will be kept on file.
<b>Frequency:</b>	Set measurable goal for inventory and potential inspection SOP development. Upon complaint receipt – Ongoing throughout the permit year
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Bacteria

<b>Title:</b>	<b>IDDE10 – Industrial and High Risk Runoff List Maintenance</b>
<b>Description:</b>	Topeka will maintain a list of private industrial facilities that have the potential to contribute substantial pollutant loading to the MS4, as outlined in the NPDES-MS4 permit.
<b>Measurable Goal:</b>	The list will be evaluated annually, and updated if necessary to add local facilities that newly meet list criteria, or delete those that no longer meet list criteria. The list will be kept on file.
<b>Frequency:</b>	Annual
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria – depending on facilities listed

<b>Title:</b>	<b>IDDE11 – Industrial and High Risk Runoff Monitoring</b>
<b>Description:</b>	Topeka will choose two facilities from the Industrial and High Risk Runoff List (see IDDE10 above) each permit year for inspection and sampling of stormwater runoff in keeping with NPDES-MS4 permit requirements.
<b>Measurable Goal:</b>	Inspection and sampling results will be documented and kept on file.
<b>Frequency:</b>	Annually
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria – depending on facilities monitored

## 2.4 Construction Site Stormwater Runoff Control

Topeka is required to implement a construction site stormwater runoff control program for new and re-development projects that disturb one acre or greater of land. The focus of the program, as defined in Part 1 Section C Item 1 of the Permit, is to address pollutants in stormwater runoff from permitted construction activities. Toward this end, Topeka’s construction site stormwater program is comprised of a number of activities and tools, many of which are explicitly required as BMPs by the Permit.

Topeka’s list of BMPs to fulfill the Construction Site Stormwater Runoff Control (CSSRC) MCM are listed below.

Title: CSSRC1 – Erosion Control Ordinance - Plan Reviews	
<b>Description:</b>	Topeka will maintain and enforce <i>Chapter 13.30 Erosion and Sediment Control</i> of the Topeka Municipal Code, which satisfies the requirement in the NPDES-MS4 Permit for an ordinance to require erosion and sediment controls and sanctions to ensure compliance. Administration and enforcement of the ordinance will occur through City reviews of erosion and sediment control plans (plan approval constitutes ordinance compliance) and construction site inspections (see CSSRC2 below).
<b>Measurable Goal:</b>	<p>The number of erosion control plans submitted for review and the number of plans approved during the permit year will be documented.</p> <p>Qualified Topeka staff will review 100% of the erosion and sediment control plans submitted, resulting in either plan approval or denial. Plan review and approval will be documented.</p> <p>Chapter 13.30 will be revised in 2018 to strengthen BMP effectiveness, and will be submitted to the Topeka City Council for subsequent adoption.</p>
<b>Frequency:</b>	Chapter 13.30 enforcement - ongoing, throughout the permit year Chapter 13.30 revision and adoption – 2019
<b>Responsible Dept.</b>	Public Works (Division of Inspections)
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment

Title: CSSRC2 – Erosion Control Ordinance – Site Inspections	
<b>Description:</b>	<p>Topeka will maintain and enforce <i>Chapter 13.30 Erosion and Sediment Control</i> of the Topeka Municipal Code, which satisfies the requirement in the NPDES-MS4 Permit for an ordinance to require erosion and sediment controls and sanctions to ensure compliance. Administration and enforcement of the ordinance will occur through City reviews of erosion and sediment control plans (see CSSRC1 above) and construction site inspections. Chapter 13.30 will be enforced via construction site inspections that focus on adherence to the approved erosion and sediment control plan, maintenance and proper operation of erosion and sediment control BMPs, the management of other construction related wastes, and (when necessary) the implementation of corrective actions not included in the approved plan but deemed necessary, either by the site operator or City inspection staff, to control pollutant discharges.</p> <p>Violations of Chapter 13.30 encountered during site inspections by City staff will be documented in construction inspection logs.</p>
<b>Measurable Goal:</b>	<p>Qualified Topeka staff will inspect 100% of construction sites that have a City-approved erosion and sediment control plan on a regular basis. Inspections and enforcement actions (when performed) will be documented in construction inspection logs.</p> <p>Topeka will respond to 100% of complaints received related to erosion and sediment discharges from construction activities by the next work day. These activities, and any enforcement actions that occur, will be documented in</p>

construction inspection logs.

The number of open construction sites inspected during the permit year will be kept on file.

Any edits to Chapter 13.30 will be revised in 2018 if necessary, and will be submitted to the Topeka City Council for subsequent adoption.

<b>Frequency:</b>	Chapter 13.30 enforcement - ongoing, throughout the permit year Chapter 13.30 revision and adoption – 2019
<b>Responsible Dept.</b>	Public Works (Division of Inspections)
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment

<b>Title:</b>	<b>CSSRC3 – Land Disturbance Training for City Staff</b>
<b>Description:</b>	Topeka staff who are responsible for review and approval of erosion and sediment control plans and who perform construction site erosion and sediment control inspections will receive training on construction site management BMP design, installation, and maintenance.
<b>Measurable Goal:</b>	City staff will receive training once every two years starting in 2019. Training documentation (e.g., course certificates with the participant’s name) will be kept on file.
<b>Frequency:</b>	Once every two years
<b>Responsible Dept.</b>	Public Works (Division of Inspections)
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment

<b>Title:</b>	<b>CSSRC4 – Land Disturbance Training for Site Designers and Contractors</b>
<b>Description:</b>	Construction site stormwater runoff management training will be offered to site designers and site contractors. The training will include discussion of Chapter 13.30 requirements, plan review and site inspection processes and expectations, and common construction site pollution management issues.
<b>Measurable Goal:</b>	Topeka will offer CSSRC training once every two years starting in 2020. Training documentation (e.g., sign-in sheets, copies of presentations given, hand-outs) will be kept on file.
<b>Frequency:</b>	Once every two years
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment

## 2.5 Post-Construction Stormwater Management

Topeka is required to implement a post-construction stormwater management program for new and re-development projects that disturb one acre or greater of land. The focus of the program, as defined in Part 1 Section C Item 1 of the Permit, is to address pollutants in stormwater runoff from developed sites. Toward this end, Topeka’s post-construction site stormwater program is comprised of a number of activities and tools, many of which are explicitly required as BMPs by the Permit.

Topeka’s list of BMPs to fulfill the Post-Construction Stormwater Management (PCSM) MCM are listed below.

Title: PCSM1 – Post-Construction Design Requirements	
<b>Description:</b>	<i>Chapter 13.35 Stormwater Management</i> of the Topeka Municipal Code will require the implementation of post-construction stormwater designs to address pollutants in stormwater runoff from new developments and redevelopments, as defined in the NPDES-MS4 permit. These provisions will be enforced through its requirement for the preparation, submittal, and approval of stormwater design plans. Such design plans shall meet or exceed the performance standard(s) established in Chapter 13.35.
<b>Measurable Goal:</b>	Qualified Topeka staff will review 100% of the stormwater design plans submitted for adherence to the post-construction stormwater design provisions of Chapter 13.35, resulting in either plan approval or denial.  Chapter 13.35 will be revised in 2018 to add and/or strengthen the provisions referred to in the measurable goal above, and will submitted to the Topeka City Council for subsequent adoption in 2019.
<b>Frequency:</b>	Chapter 13.35 enforcement - ongoing, throughout the permit year Chapter 13.35 revision and adoption – 2019
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients

Title: PCSM2 – Post-Construction BMP Construction Requirement	
<b>Description:</b>	Currently, <i>Chapter 13.35 Stormwater Management</i> of the Topeka Municipal Code will require site operators to adhere to the approved stormwater design plan for construction of post-construction stormwater management facilities. In 2018, Topeka’s post-construction stormwater management program will be reviewed and updated to better facilitate enforcement of this provision of Chapter 13.35 through.
<b>Measurable Goal:</b>	Ongoing enforcement of current Chapter 13.35.  Chapter 13.35 will be revised to add and/or strengthen the provisions referred to in the BMP description and measurable goal above, and will submitted to the Topeka City Council for subsequent adoption in 2019.
<b>Frequency:</b>	Chapter 13.35 enforcement – ongoing, throughout the permit year Chapter 13.35 review and revision – 2018

Chapter 13.35 (revised) adoption by City Council – 2019

<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients

**Title: PCSM3 – Post-Construction BMP Construction Final Approval**

**Description:** *Chapter 13.35 Stormwater Management* of the Topeka Municipal Code will require all applicable new developments and redevelopments (as defined in Chapter 13.35) to undergo a final construction inspection prior to full as-built plan approval. The inspection will focus on confirmation of the information provided in the as-built plan and the cleanliness and proper function of post-construction stormwater facilities at the end of construction.

**Measurable Goal:** In 2018, Chapter 13.35 will be revised to add the provisions referred to in the BMP description and measurable goal above, and will be submitted to the Topeka City Council for subsequent adoption in 2019.

**Frequency:** Chapter 13.35 revision – 2018  
Chapter 13.35 (revised) adoption by City Council – 2019  
Chapter 13.35 enforcement - ongoing, throughout the permit year after revision and adoption

<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients

**Title: PCSM4 – Post-Construction Inspection & Maintenance Program**

**Description:** Currently, *Chapter 13.35 Stormwater Management* of the Topeka Municipal Code requires the maintenance of post-construction stormwater facilities.

**Measurable Goal:** In 2018, Chapter 13.35 will be revised to add the provisions referred to in the BMP description and measurable goal above, and will be submitted to the Topeka City Council for subsequent adoption in 2019.

**Frequency:** Chapter 13.35 revision – 2018  
Chapter 13.35 (revised) adoption by City Council – 2019  
Chapter 13.35 enforcement - ongoing, throughout the permit year after revision and adoption

<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients

<b>Title:</b>	<b>PCSM5 – Post-Construction Training for Developers, Site Designers, and Contractors</b>
<b>Description:</b>	Post-construction stormwater management training will be offered to site designers, and site contractors. The training will include discussion of Chapter 13.35 requirements, plan review, construction inspection, and as-built processes and expectations, and common post-construction design and construction issues.
<b>Measurable Goal:</b>	Topeka will offer post-construction training once every five years starting in 2020. Training documentation (e.g., sign-in sheets, copies of presentations given, hand-outs) will be included in the annual report.
<b>Frequency:</b>	Bi-annually
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients

## 2.6 Pollution Prevention/Good Housekeeping for Municipal Operations

Topeka is required to implement a pollution prevention and good housekeeping program for municipal operations. The focus of the program, as defined in Part 1 Section C Item 1 of the Permit, is to prevent or reduce pollutant runoff from municipal operations. The only specific conditions of this MCM are:

- the City’s program must include employee training; and,
- the City’s program must consider all aspects of the municipal operations relevant to pollution prevention.

Beyond these requirements, the means by which Topeka implements a Pollution Prevention/Good Housekeeping (PPGH) program is not explicitly defined in the Permit. The BMPs performed by Topeka to comply with this MCM are listed below.

<b>Title:</b>	<b>PPGH1 – Employee Training</b>
<b>Description:</b>	Topeka will implement an employee training program addressing reduction and/or prevention of stormwater pollution that could be caused by municipal employee actions, as is required by the Permit. The training will be provided to City staff whose work responsibilities may carry the risk of discharge of pollutants from municipal operations through the implementation of good housekeeping practices. This includes staff in the Topeka Public Works, Street Maintenance, and Utilities departments.
<b>Measurable Goal:</b>	Staff training will be provided annually. Training documentation (e.g., sign-in sheets, copies of presentations, programs, or course provided, handouts) will be kept on file.
<b>Frequency:</b>	Annual
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	No

<b>Title:</b>	<b>PPGH2 – Municipal Facility Inspections</b>
<b>Description:</b>	Topeka will inspect all of the City’s municipal facilities subject to the Kansas Water Pollution Control and National Pollutant Discharge Elimination System Stormwater Runoff from Industrial Activity General Permit (herein the NPDES Industrial General Permit). Potential sources of pollutant exposure to stormwater and opportunities for improvements will be noted. Inspections will be conducted in coordination with the identification of stormwater pollution prevention programs (required by NPDES Industrial General Permit) and training at municipal facilities.
<b>Measurable Goal:</b>	Municipal facilities will submit inspection reports annually to the City of Topeka Water Pollution Control Division in conjunction with reporting required by industrial NPDES permits. A summary of the results will be kept on file.
<b>Frequency:</b>	Annual
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	No

<b>Title:</b>	<b>PPGH3 – Street Sweeping</b>
<b>Description:</b>	Topeka will sweep city streets to, in part, address pollutant loading to the storm sewer system. In general, street sweeping will following the City’s standard sweeping schedule, which focuses on street cleanliness for aesthetics and on stormwater system drainage maintenance. This schedule will be adjusted as necessary to address pollutants, such as sediment, litter, and other floatables, on streets where the potential for discharge of such pollutants to the MS4 is high. Such areas may include streets near large construction sites or where fast-food restaurants are located, or after outdoor festivals have occurred.
<b>Measurable Goal:</b>	The street sweeping schedule will be reviewed and updated when necessary. The annual number of lane miles swept will be kept on file.
<b>Frequency:</b>	Ongoing, throughout the permit year
<b>Responsible Dept.</b>	Public Works Department
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

<b>Title:</b>	<b>PPGH4 – Pesticide/Herbicide Application Training</b>
<b>Description:</b>	Topeka staff who have pesticide/herbicide application responsibilities will be licensed in pesticide/herbicide application or will be directly supervised by licensed City staff.
<b>Measurable Goal:</b>	Topeka will maintain pesticide/herbicide licensing records as required by local, State, and Federal laws for pesticide/herbicide application events. Licensed staff



will be trained periodically to ensure proper management and application of the chemical.

<b>Frequency:</b>	Ongoing, throughout the permit year
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	No

**Title: PPGH5 – Stormwater Control Structure Maintenance**

<b>Description:</b>	Topeka will identify, inspect, operate, and maintain City-owned stormwater control structures through a coordinated operations and maintenance program. An SOP will be developed to guide and document city inspection and maintenance. The SOP will be generally aligned with the inspection and maintenance program for private stormwater quality facilities.
<b>Measurable Goal:</b>	Control structure inspections will be documented and kept on file.
<b>Frequency:</b>	The stormwater control structure maintenance SOP will be developed in 2018 and implemented in 2019. Until that time, Topeka will continue to maintain stormwater control structures according to existing schedules and records kept in the City Works® asset management system.
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

**Title: PPGH6 – Hazardous Waste Spill Program**

<b>Description:</b>	Topeka’s Fire Department is the first to respond to spills of hazardous materials and solid wastes onto public roadways and private and public properties. City staff will monitor clean up efforts to see that discharged materials are cleaned up by the responsible parties and reported to local, State, and Federal officials as required by law and regulations. City staff activities are guided by the City’s Hazardous Materials Incident Response SOP.
<b>Measurable Goal:</b>	100% of hazardous materials or solid waste spill incidences, notifications, clean-up activities, and environmental impacts will be documented and provided with the annual report.
<b>Frequency:</b>	Intermittent, as hazardous materials and solid waste spills occur
<b>Responsible Dept.</b>	Utilities and/or Emergency Management
<b>TMDL Regulated Pollutant BMP?</b>	No

<b>Title: PPGH7 – Stormwater Treatment Demonstration Projects</b>	
<b>Description:</b>	Topeka staff will evaluate planned City construction and capital improvement projects for inclusion of post-construction stormwater quality BMPs to be used as potential demonstration projects. Topeka will maintain list of potential demonstration projects, to include project name, location, status, and expected year of construction.
<b>Measurable Goal:</b>	Planned City construction and capital improvement projects will be evaluated annually, at a minimum. The list will be kept on file (e.g. Eclipse PPM software).
<b>Frequency:</b>	Annual
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

<b>Title: PPGH8 – Inlet Inspection and Cleaning</b>	
<b>Description:</b>	Topeka will inspect and clean stormwater inlets to, in part, reduce pollutant loading to the storm sewer system. In general, inlet cleaning is performed according to a standard schedule, which focuses primarily on preventing or removing inlet blockage. This schedule will be adjusted as necessary to address pollutants, such as sediment, litter, leaves, and other floatables, at inlets where the potential for discharge of such pollutants to the MS4 is high. Such areas may include streets near large construction sites or where fast-food restaurants are located, or after outdoor festivals have occurred.
<b>Measurable Goal:</b>	Staff will evaluate inlet inspection and cleaning locations and frequency on an on-going basis based on season, storms and other weather events, visual observation, and staff knowledge of problem areas. Inlet inspections and cleaning will be documented and submitted with the annual report.
<b>Frequency:</b>	Ongoing, throughout the permit year
<b>Responsible Dept.</b>	Utilities
<b>TMDL Regulated Pollutant BMP?</b>	Yes – Sediment, Nutrients, Bacteria

### SECTION 3: MONITORING INDUSTRIAL AND HIGH RISK RUNOFF

Topeka is required to implement a program for monitoring industrial and high risk runoff areas. The focus of the program, as defined in Part I, Section D of the Permit, is to address potential for pollutant discharges from industrial and high risk areas. The specific conditions of this requirement are as follows.

1. A list of industrial facilities that Topeka determines are contributing substantial pollutant loading to the MS4 must be developed and maintained.
2. Topeka must sample stormwater runoff from at least two facilities on the list on an annual basis, for a prescribed set of parameters.

Beyond these requirements, the means by which Topeka implements the Industrial and High Risk Runoff Monitoring program is not explicitly defined by the Permit. Toward this end, Topeka’s program is integrated into the six minimum control measures detailed in Section 2 of this SMP document. More specifically, the BMPs that fulfill the requirements of the permit are listed in Table 2. Each BMP listed in Table 2 is described in full detail in Section 2 of this SMP document.

<b>Table 2. BMPs that Address Industrial and High Risk Runoff</b>	
<b>Pollutant Targeting Activity (by BMP ID)</b>	<b>Pollutant Control Approaches Implemented by the BMP(s)</b>
<b>PEO1</b> Stormwater Videos and Graphics <b>PEO2</b> Stormwater Quality Brochure <b>PEO3</b> Stormwater Website	Public Education/Outreach programs address general pollution prevention for a wide range of pollutants and pollutant sources (homeowners, restaurants, other businesses, etc.). Operators of industrial facilities may also see this information.
<b>IDDE10</b> Industrial and High Risk Runoff List Maintenance <b>IDDE11</b> Industrial and High Risk Runoff Monitoring	Topeka’s Illicit Detection and Elimination activities include identification and monitoring of City-identified industrial and high risk runoff facilities.
<b>PPGH3</b> Street Sweeping	By removing street debris and sediment, the street sweeping program targets some of the pollutants (e.g. oils/grease, sediment, phosphorous and nitrogen) commonly found in industrial and high risk area runoff.

## SECTION 4: TOTAL MAXIMUM DAILY LOAD (TMDL) REGULATED POLLUTANTS

### 4.1 Best Management Practices

Topeka is required to implement a program to address TMDL regulated pollutants. The focus of the program, as defined in Part I, Section E of the Permit, is the reduction of the pollutants identified in the TMDL Table (Part II of the Permit) from the MS4 to the maximum extent practicable. Toward this end, Topeka’s program for TMDL Regulated Pollutants is integrated into the six minimum control measures detailed in Section 2 of this SMP document. More specifically, the BMPs that fulfill the Permit’s requirements for TMDL Regulated Pollutants are listed in Table 2, but were described fully in Section 2 of this SMP document, including identification of measurable goals.

<b>Table 3. Regulated Pollutant and Target BMPs</b>		
<b>Primary Pollutant<sup>1</sup></b>	<b>Pollutant Targeting BMP (by BMP ID)</b>	<b>Pollutant Control Approaches Implemented by the BMP</b>
<b>Sediment</b>	<b>CSSRC1</b> Erosion Control Ordinance – Plan Reviews	Topeka implements a comprehensive approach to construction site stormwater runoff control, including permitting, plans review, inspections and enforcement of erosion prevention and sediment control targeted at reducing sediment.
	<b>CSSRC2</b> Erosion Control Ordinance – Site Inspections	
	<b>CSSRC3</b> Land Disturbance Training for City Staff	
	<b>CSSRC4</b> Land Disturbance Training for Site Designers and Contractors	

**Table 3. Regulated Pollutant and Target BMPs**

Primary Pollutant <sup>1</sup>	Pollutant Targeting BMP (by BMP ID)	Pollutant Control Approaches Implemented by the BMP
	<p><b>PCSM1</b> Post-Construction Design Requirements</p> <p><b>PCSM2</b> Post-Construction BMP Construction Requirements</p> <p><b>PCSM3</b> As-Built Plans</p> <p><b>PCSM4</b> Post-Construction Maintenance Program</p> <p><b>PCSM5</b> Post-Construction Training for Site Designers and Contractors</p>	<p>Post-construction stormwater management activities target sediment. Implementation of the program focuses on the prevention of pollutant discharges to the MS4.</p>
<b>Nutrients</b>	<p><b>PEO1</b> Cable Channel 4 Stormwater Videos and Graphics</p> <p><b>PEO2</b> Stormwater Quality Brochures</p> <p><b>PEO3</b> Stormwater Information on City Website</p> <p><b>PEO4</b> Grab Bag Programs and Events</p> <p><b>PCSM1</b> Post-Construction Design Requirements</p> <p><b>PCSM2</b> Post-Construction BMP Construction Requirements</p> <p><b>PCSM3</b> As-Built Plans</p> <p><b>PCSM4</b> Post-Construction Maintenance Program</p> <p><b>PCSM5</b> Post-Construction Training for Site Designers and Contractors</p>	<p>Public education/outreach programs address general pollution prevention for a wide range of pollutants and pollutant sources.</p> <p>Post-construction stormwater management activities target sediment which is known to carry other pollutants such as nutrients. Implementation of the program focuses on prevention of pollutant discharges to the MS4.</p>
<b>Bacteria</b>	<p><b>PEO1</b> Cable Channel 4 Stormwater Videos and Graphics</p> <p><b>PEO2</b> Stormwater Quality Brochures</p> <p><b>PEO3</b> Stormwater Information on City Website</p> <p><b>PEO4</b> Grab Bag Programs and Events</p> <p><b>IDDE1</b> IDDE Ordinance Review and Update</p> <p><b>IDDE2</b> CCTV Inspection of Storm Sewer</p> <p><b>IDDE3</b> CCTV Inspection of Sanitary Sewer</p> <p><b>IDDE6</b> SSO Response</p> <p><b>IDDE8</b> Septage and Leachate Program</p> <p><b>IDDE9</b> Septic System Regulation</p>	<p>Public education/outreach programs address illicit discharges, including bacteria sources.</p> <p>The City's illicit detection and elimination BMPs include inspection of suspected or identified illicit connections to the storm sewer. Illicit discharges and connections are identified during outfall inspections and CCTV inspections of the storm and sewer systems</p>

<sup>1</sup> This table identifies the primary TMDL regulated pollutant targeted by a BMP. In some cases, a BMP targets more than one pollutants. See the individual BMPs in Section 2 for more details.

## 4.2 Maps

In keeping with Part I, Section E.3 of the Permit, Topeka maintains maps for the watersheds draining to streams listed in the TMDL Table as indicated in Table 4 below.

<b>Table 4. TMDL Regulated Pollutants Map Contents (Topeka MS4)</b>	
<b>Map Requirement (Permit Part I, Section E.3)</b>	<b>Is the required content included on the map? (Yes/No)</b>
The Permit Area, including boundaries of the contributing drainage basins and primary sub-basins, within and outside the Permit Area.	Yes
The locations of structural BMPs	No. Topeka does not currently implement structural BMPs to address TMDL Regulated Pollutants.
The stormwater BMP influent/effluent monitoring locations	No. Topeka does not currently implement influent/effluent monitoring for TMDL Regulated Pollutants.
Lake and stream monitoring locations	Yes
Storm sewer collection system which includes the outfalls within the Permit Area where the MS4 drains to the TMDL listed impaired streams or lakes	Yes

## SECTION 5: MONITORING

Topeka implements a robust wet weather monitoring program in keeping with in Parts III and IV of the Permit. Topeka conducts a variety of monitoring activities on streams for Permit compliance and as part of the EPA approved TMDL program. Monitoring is performed as prescribed in the Permit and approved EPA TMDLs and follows the frequency and parameters as outlined in those documents. Monitoring data is included with the annual report.

## SECTION 6: OTHER SMP ELEMENTS

### 6.1 Reporting

Topeka will submit a calendar year annual report to the Kansas Department of Health and Environment (KDHE) no later than February 28 of each year. The annual report covers the activities that the City undertook during the previous calendar year and contains all essential elements outlined in Part V of the Permit.

### 6.2 Modifications to BMPs and the SMP Document

Topeka annually evaluates the SMP and makes any needed changes as required in Part I Section 1 of the Permit. Any modifications to the SMP are provided in an updated SMP document, and are documented in annual reports.