

Logo Design by Sean McCartney

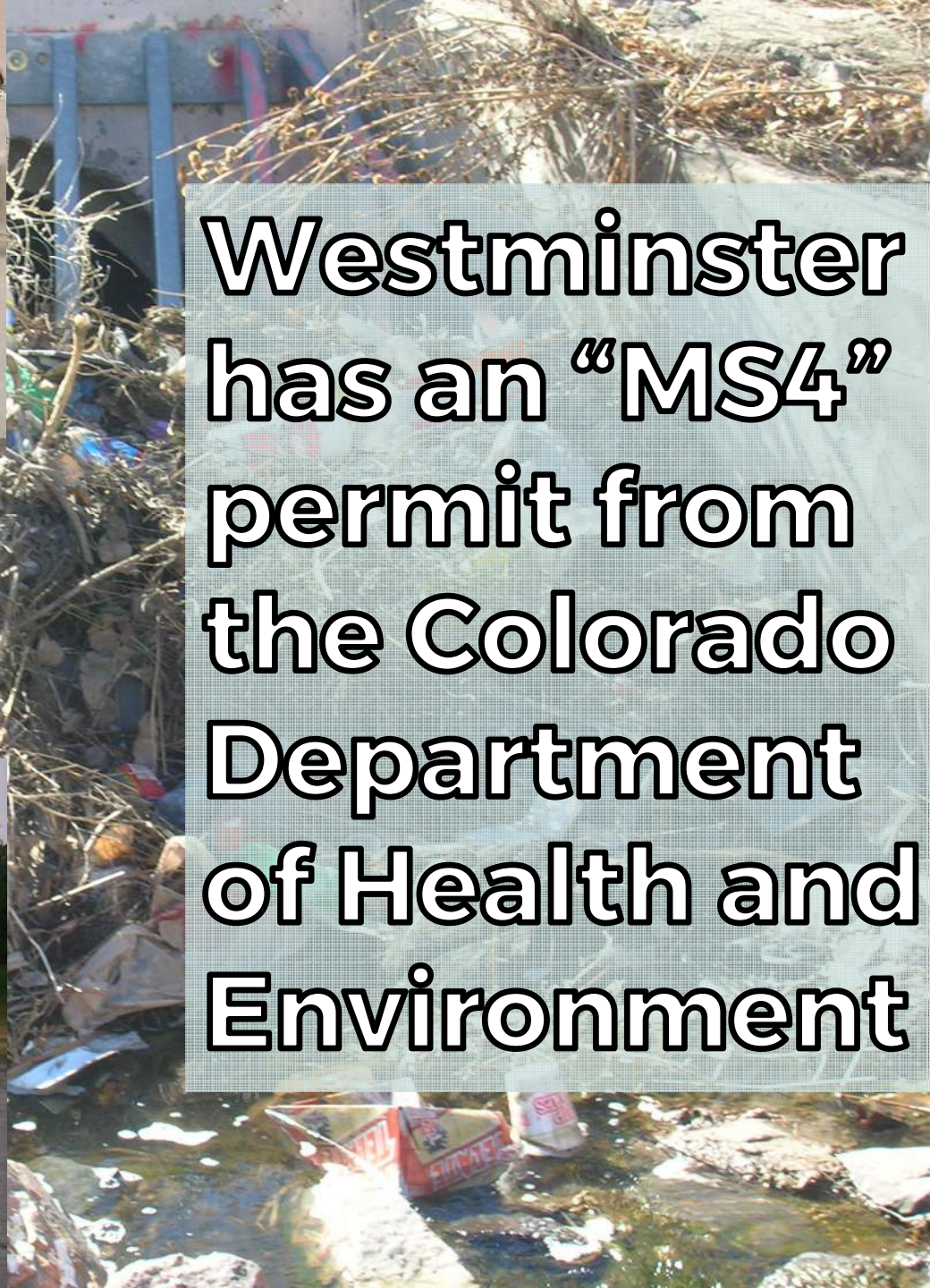
Past, Present and Future – City of Westminster Stormwater Construction Program

Mountain States IECA Conference

Jake Moyer – Stormwater Analyst

OVERVIEW

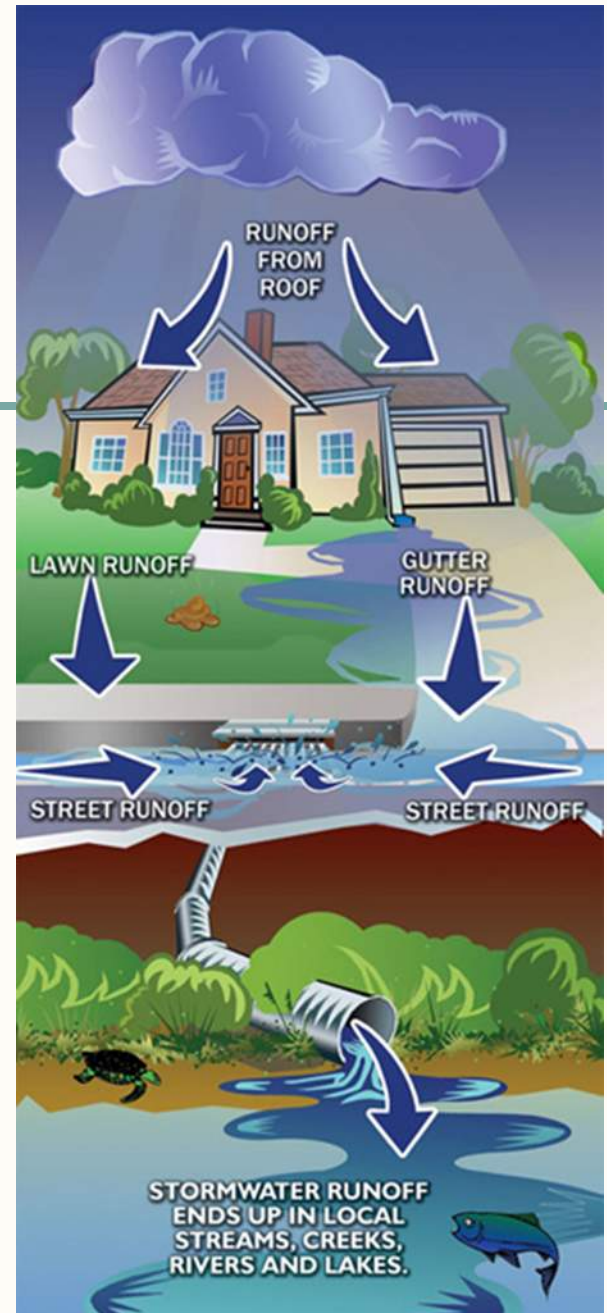
- Municipal Separate Storm Sewer System (MS4) Phase II Discharge Permit Requirements
- Self Audit findings – December 2016
- New FTE in works for 2020 and beyond
- Construction site inspection program – September 2017
- Future of the Stormwater Construction Program



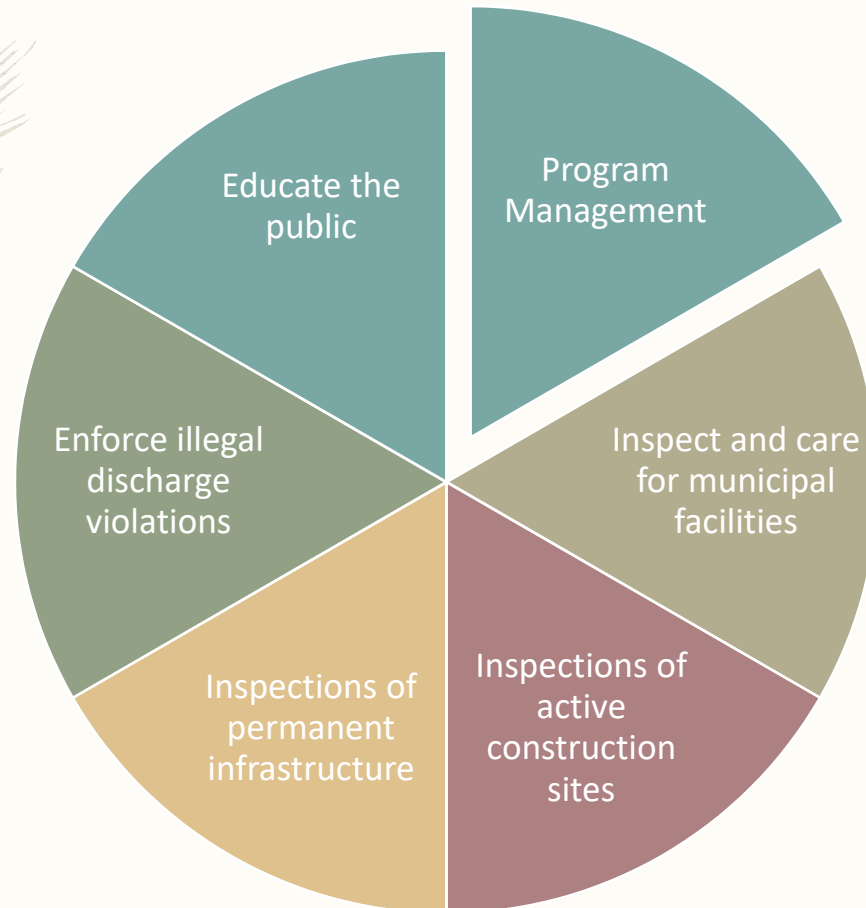
**Westminster
has an “MS4”
permit from
the Colorado
Department
of Health and
Environment**

MS4 PERMIT

- The City of Westminster holds a permit from the Colorado Department of Public Health and Environment (CDPHE) to discharge stormwater from our storm drain system.
- Only stormwater (and a few other allowable discharges) can be discharged into the storm drain system.
- Pollutants are strictly prohibited from being disposed of in our storm drains.
- As part of the MS4 permit, we must implement the following programs to prevent pollutants from entering the storm drain system:
 - Construction sites program
 - Post-construction program
 - Illicit discharges program
 - Public education and involvement program.
 - Municipal facilities program
 - Employee training program



WHAT KINDS OF THINGS DOES THE CITY HAVE TO DO?



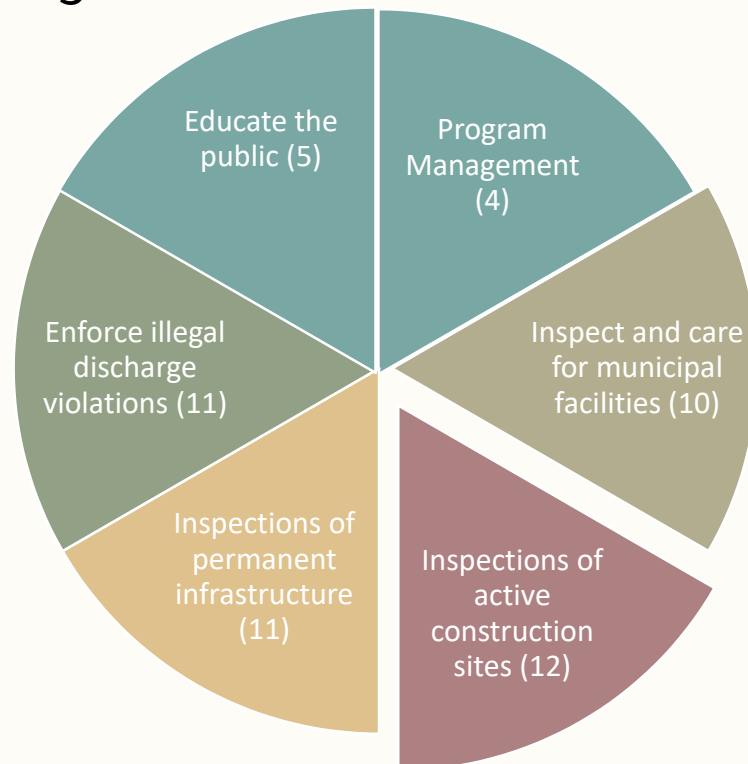
2016 SELF AUDIT



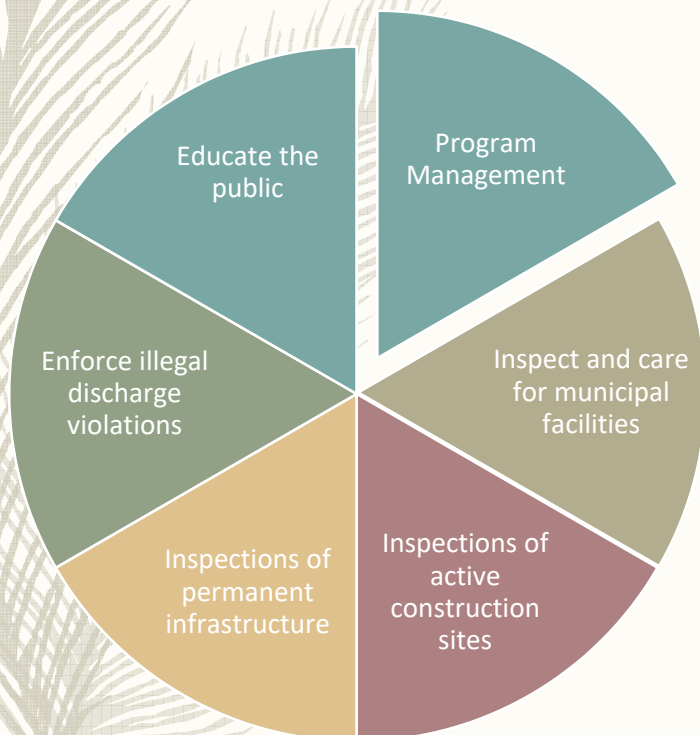
- In-person interviews with individuals and teams in:
 - Community Development, Engineering Division
 - Public Works and Utilities, Streets Division
 - Public Works and Utilities, Operations Division
 - General Services, Building Operations and Maintenance
 - General Services, Fleet
 - General Services, Risk Management
 - PR&L: Parks Division
 - PR&L: Golf Division
- File reviews of over 52 documents, including design standards, city code
- Site visits to:
 - City Hall, new residential construction, Downtown parking garage construction, Legacy Ridge Golf Course, MSC, Parks Braugh property, Parks shops

...SO WHAT DID THE AUDIT SAY?

- There were 53 compliance gaps across the MS4 program



SO WE WENT TO CITY MANAGERS OFFICE WITH THE AUDIT



CMO Direction:

- The city must comply with the permit
- **Highest priorities: construction site compliance program, illegal dumping, enforcement**
- Prepare a business case for FTE in 2019-2020 budget cycle
- Utilize and restructure revenue from “Stormwater Enterprise Fund”

RESOURCE NEEDS

Previous (2016) 3.5 FTE:

- 1 FTE for program management, asset management – currently funded from general fund
- 1 FTE for capital planning and project management
- 0.5 FTE for floodplain management
- 1 FTE for GIS and data management

Current (2019) 4.5 FTE

- 1 FTE for program management, asset management – funded out of enterprise.
- 2 FTE for program compliance (construction, post-construction, IDDE, education and outreach, Municipal Facilities.
- 1 FTE for capital planning, project management and floodplain management.
- 0.5 FTE for Administrative duties

Compliance Focus (4 FTE)

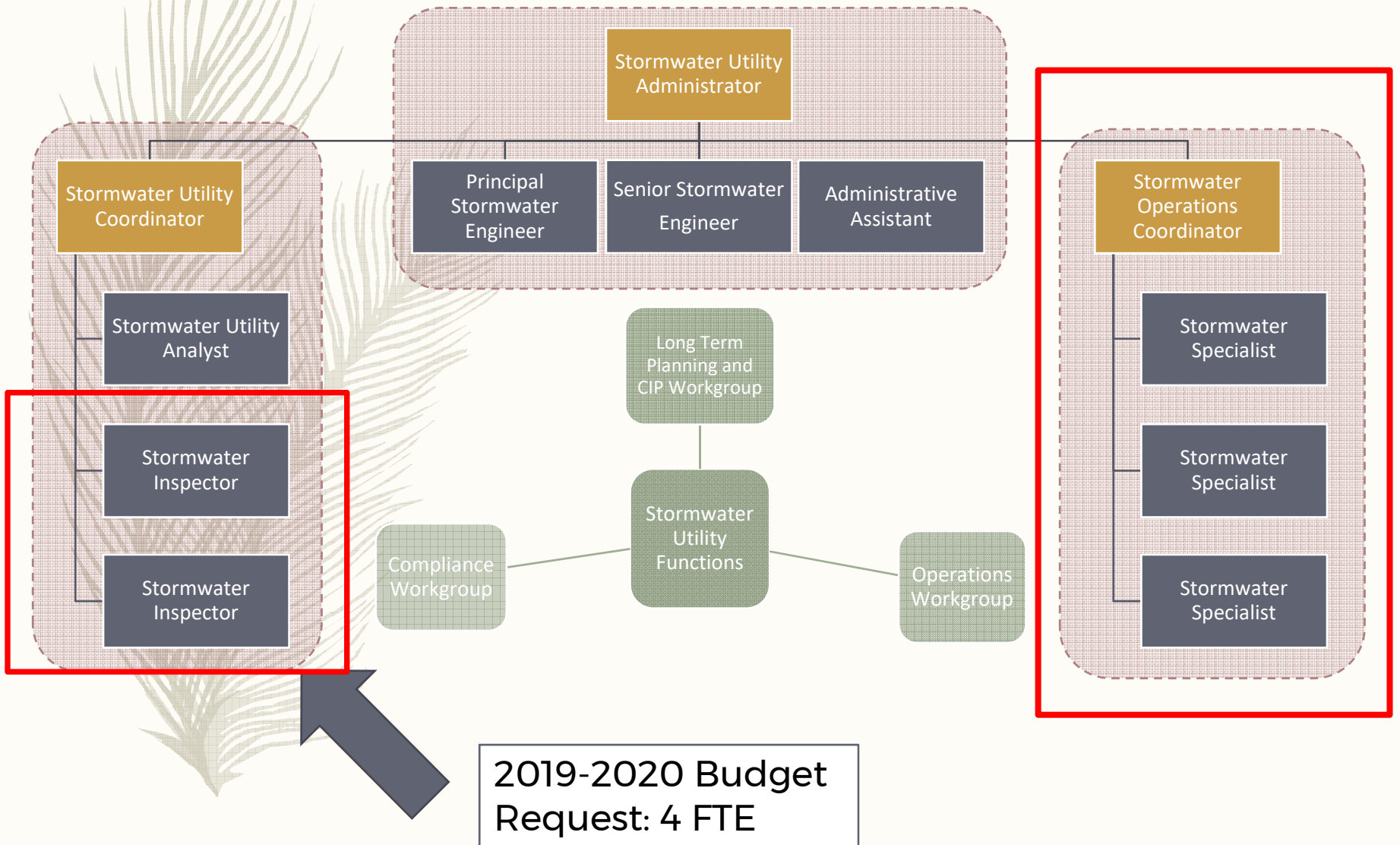
- 2 FTE for construction site compliance program, including SWMP reviews
- 1 FTE for compliance program management, education and outreach, and construction site compliance program
- 1 FTE for post-construction, IDDE, city facility compliance, and training

Operational Focus (4 FTE)

- 1 FTE for maintenance and repair and replacement contract management – open drainageways
- 3 FTE for maintenance and repair and replacement for engineered infrastructure and streets contract management.

Stormwater Team Organizational Chart: Vision 2019-2022

Future Needs



Compliance Priority: Construction Sites





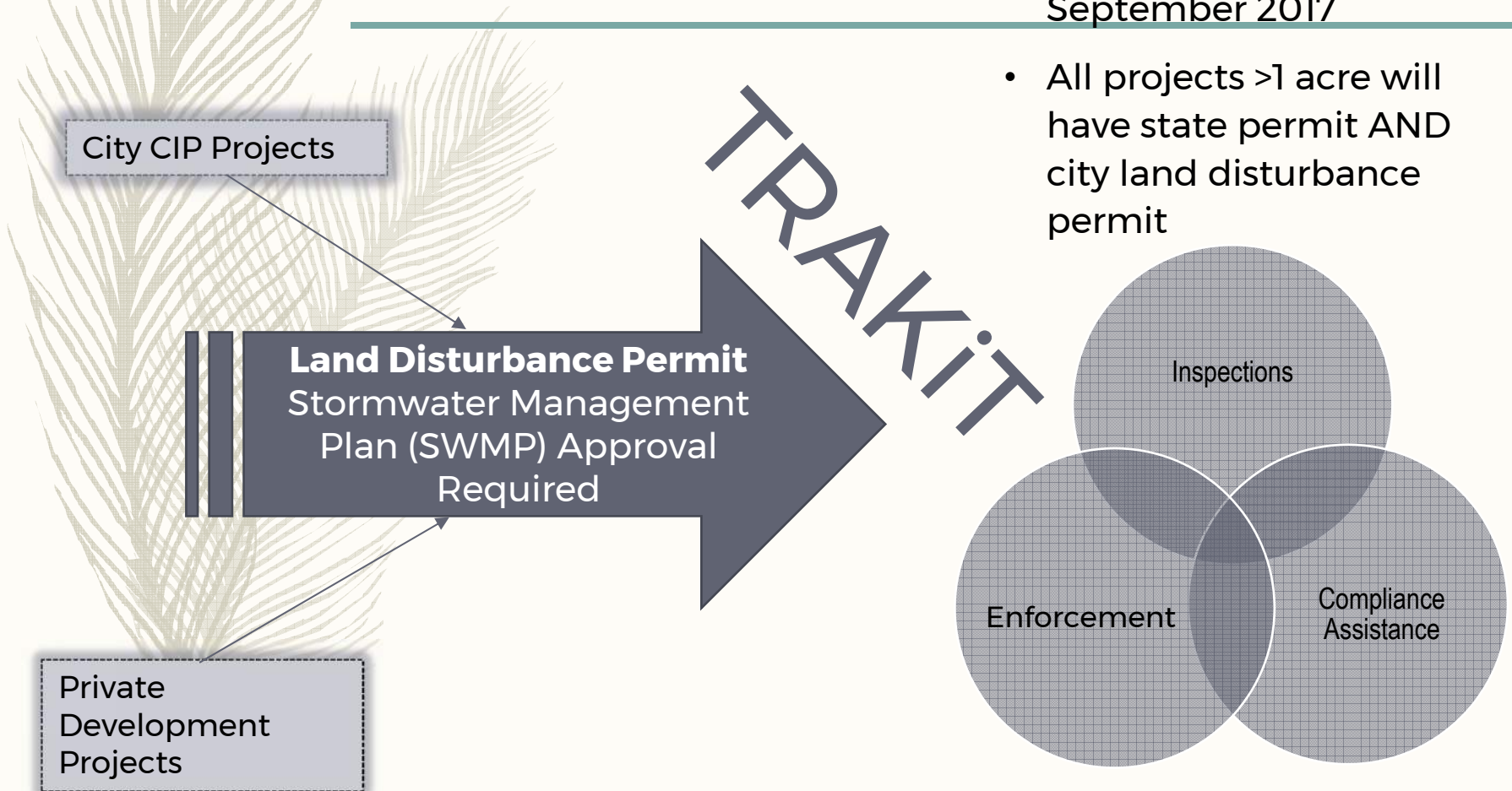






A FRESH START FOR CONSTRUCTION SITE COMPLIANCE

- One of the highest priorities from the audit.
- Third party consultant hired in August 2017, started inspections September 2017
- All projects >1 acre will have state permit AND city land disturbance permit



A FRESH START FOR CONSTRUCTION SITE COMPLIANCE



WESTMINSTER

**STORMWATER
CONSTRUCTION MS4
PROGRAM PLAN**

Revised:
September 2019

City of Westminster
Storm Drainage Design
and Technical Criteria


Manual 2019 Edition



- Standard Operating Procedures (review and inspections)
- Construction Program Plan
- Updated Construction Standards and Specifications
- Updated Drainage Criteria

A FRESH START FOR CONSTRUCTION SITE COMPLIANCE

- Routine, compliance, complaint and reduced site inspections
- Routine inspection form w/ pictures
- Operator Compliance Follow-Up Form



WESTMINSTER MS4 STORMWATER COMPLIANCE INSPECTION

Project Information

Project Name: _____ Land Disturbance Permit #: _____
Project Address: _____ Date of Inspection: _____
CDPS Permit No.: _____ Phone Number: _____
Project Contractor: _____
Project SWMP Administrator: _____

Reason(s) for Inspection

☐ Initial Inspection ☐ Required every 90 Calendar Day **Reduced Inspection** for inactive sites/stormwater management program/ SWMP staff vacancy (circle one)
☐ Required 45 Calendar Day **Routine Inspection** for MS4 Oversight
☐ Required 14 Calendar Day **Indicator Inspection** for MS4 Oversight (screening/drive-by)
☐ Required 14 Calendar Day **Compliance Inspection** for MS4 Oversight (corrective action follow-up)
☐ **Complaint** Date reported/identified: _____
☐ Other: _____

Construction Site Assessment

1. Did the project fail to implement control measures? ☒ Yes ☐ No ☐ N/A
2. Were inadequate control measures observed? ☐ Yes ☒ No ☐ N/A
3. Was offsite tracking observed? ☐ Yes ☒ No ☐ N/A
4. Were any offsite discharges observed at the time of inspection? ☐ Yes ☒ No ☐ N/A **If yes, describe:** _____
5. Do any control measures need routine maintenance? ☒ Yes ☐ No ☐ N/A
6. Were the results of this inspection discussed with the SWMP Administrator? ☐ Yes ☒ No ☐ N/A
7. Were all pollutant sources evaluated? ☐ Yes ☐ No ☒ N/A

Comments: _____

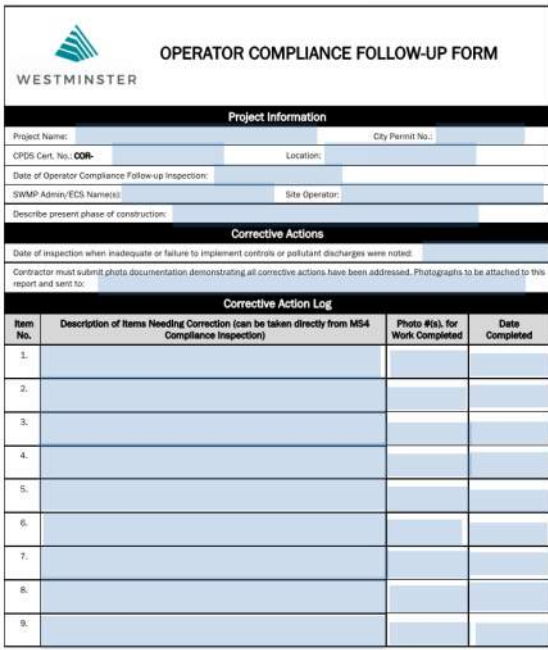
MS4 Inspection Results

☐ **Failing Inspection:** No deficiencies exist.
☐ **Failing Inspection:** No deficiencies exist but routine maintenance identified.
☐ **Deficiencies Exist:** Please note corrective actions must be addressed immediately in most cases.

Deficiencies identified in this inspection may constitute violations of Westminster Municipal Code. Notices of Violation may be issued separately to sites with illegal discharges, site-wide or systematic BMP issues, chronic site violations, and/or repeated non-compliance items.

Please note, this report may not include all deficiencies on your site. This MS4 oversight inspection is designed to assist the City in determining if this site's stormwater program is being consistently and effectively implemented.

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WESTMINSTER OPERATOR COMPLIANCE FOLLOW-UP FORM

Project Information

Project Name: _____ City Permit No.: _____
CPDS Cert. No.: **COB** Location: _____
Date of Operator Compliance Follow-up Inspection: _____
SWMP Admin/ECS Name(s): _____ Site Operator: _____
Describe present phase of construction: _____

Corrective Actions

Date of inspection when inadequate or failure to implement controls or pollutant discharges were noted: _____
Contractor must submit photo documentation demonstrating all corrective actions have been addressed. Photographs to be attached to this report and sent to: _____

Corrective Action Log

Item No.	Description of Items Needing Correction (can be taken directly from MS4 Compliance Inspection)	Photo #s, for Work Completed	Date Completed
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			

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ENFORCEMENT STRATEGY

- Enforcement Response Plan
- Updated Westminster Municipal Code (Title 8, Chapter 11)
- Seek Voluntary Compliance



CITY OF WESTMINSTER'S ENFORCEMENT RESPONSE PLAN

Revised September 2019



ENFORCEMENT ESCALATION

- Compliance Assistance
- On-Site Meeting/Mandatory Training
- Notice of Violation
- Increased Inspection Frequency
- Stop Work Order
- Administrative Penalty



FUTURE OF THE CONSTRUCTION PROGRAM

- Training videos for operator and internal staff
- Certification program for operators (Preferred Contractor List)
- Using TrakiT to help track deficiencies to obtain statistics to help focus training efforts
- Evaluate construction permit re-inspection fees to make the program financially self-sustainable
- Implement guidance documents for City Stormwater requirements and Land Disturbance Permit process
- Changing culture by building better relationships with operators and obtaining feedback



We are moving toward a
compliant and sustainable
utility...Questions?