

**(*Insert permittee name*)**

**MS4**

**Stormwater Management Plan (SWMP)**

**(*Permit Number* / 2021 - 2026)**

**(*Date of revision*)**

This document is intended as an optional template to create the Stormwater Management Plan (SWMP) for the MOR04C (comprehensive) General Permit for regulated MS4s. Additional documents and links will need to be included. Completing this document does not guarantee compliance with the permit requirements.

Categories of Regulated Small MS4s under this comprehensive permit.

This comprehensive permit categorizes MS4s by the following categories, or Groups, based on the population served as determined by the most recent Decennial Census at the time of permit issuance, the type of Regulated MS4, and the co-permittee situation.

<b>Group A</b>	<b>Group B</b>	<b>Group C</b>
Traditional Small MS4s (cities) that serve a population of less than 10,000 within a UA; OR	Traditional Small MS4s that serve a population of at least 10,000 but less than 40,000; OR	Traditional Small MS4s that serve a population of 40,001 or more; OR
Class 2 counties; Non-traditional such as Universities, Federal facilities.	Class 1 counties	Co-permit Small MS4s

The MS4 Operator may add supplemental items to the SWMP. These items include but are not limited to:

- Maps;
- Standard operating procedures (SOPs);
- Inspection forms;
- Sample data;
- Operations and Maintenance Manual;
- Website or social media account tracking;
- Stream Team Activity Reports;
- Tracking and evaluation documents; and
- Documentation of agreements for co-permittees and/or cooperative agreements.

The MS4 Operator may replace or modify ineffective BMPs with effective BMPs. If the name of a MS4 contact changes, that may be updated on the next Stormwater Management Program Report and/or via email to the Department at [MS4@dnr.mo.gov](mailto:MS4@dnr.mo.gov).

#### **MOR04C PART 4. MINIMUM CONTROL MEASURES**

Entities under coverage of the MOR04C general permit shall develop and implement a Stormwater Program that includes the following six (6) Minimum Control Measures (MCMs).

1. All six MCMs apply to all traditional MS4s (cities and counties) regulated under this permit.
2. For non-traditional MS4s (universities, hospital complexes, prisons, and federal facilities) or MS4s in a co-permit that do not have responsibility over all MCMs. The permittee shall document in the SWMP and on each MS4 Stormwater Management Program Report which MCMs are not applicable. Contact the Department for any questions regarding applicability of MCMs.

#### 4.1 **MCM 1. Public Education and Outreach on Stormwater Impacts**

The MS4 Operator shall implement a public education program to distribute educational materials to the community and/or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

The public education and outreach program shall, at a minimum include the following:

##### 4.1.A The MS4 Operator shall target specific audiences who are likely to have significant stormwater impacts.

Choose which is applicable:

☒ Traditional MS4s (cities and counties) shall address the residents being served by the MS4;  
**or**

Non-traditional MS4s shall address the community served by the MS4 as listed below:

- ☐ a) Universities shall target the faculty, other staff, and students;
- ☐ b) Military bases shall target military personnel (and dependents), and employees (including contractors)
- ☐ c) Prison complexes or other multi-building complexes shall target staff and applicable contractors.

Additional audiences within the MS4 service area (such as, but not limited to, those listed in **Table I**) shall be addressed as listed below:

Choose which is applicable:

- ☒ Group A: No requirement for additional audiences
- ☐ Group B: A minimum of one (1) additional audiences
- ☐ Group C: A minimum of two (2) additional audiences

The target audiences may remain the same for the entire permit cycle or may change if the tracking and adaptive management reviews show a new target may be better for the MS4. Any changes shall be stated and explained in the MS4 Stormwater Management Program Report.

**Table I -Target Audiences**

Choose which is applicable:

- ☐ Schools, educational organizations, or youth service and youth groups;
  - ☐ Businesses, including commercial facilities, home-base and mobile businesses;
  - ☐ Institutions or formal organizations such as churches, hospitals, service organizations;
  - ☐ Developers or construction site operators;
  - ☐ Homeowner or neighborhood associations;
  - ☐ Industrial facilities;
  - ☐ Local government;
  - ☐ Contractors;
  - ☐ Visitors/ tourist; and
  - ☐ Other target group,
-

**4.1.B** The MS4 Operator shall target specific pollutant(s) in the permittee's education program (such as, but not limited to, those listed in **Table II**).

Each MS4 shall have a minimum of one target pollutant for each target audience from Section 4.1.A of this permit.

**Traditional MS4s:**

	<b>Audience</b>	<b>Target Pollutant(s)</b>
All Traditional	Residents	
Group B & C		
Group C		

**Non-Traditional MS4s:**

	<b>Audience</b>	<b>Target Pollutant(s)</b>
Universities	Faculty, other staff, and students	
Military bases	Military Personnel and employees	
Prison complexes or other multi-building complexes	Staff and applicable contractors	

**Table II- Example Pollutants/ sources (not limited to this list)**

- Grass clippings & leaf litter;
- Fertilizer & pesticides;
- Litter, trash containment, balloon releases;
- Dumping of solid waste;
- Illegal disposal of household hazardous waste;
- Pet waste;
- Failing septic systems;
- Swimming pool discharge, including salt water pools;
- De-icing/ rock salt usage/ storage;
- Oil, grease, fluids from vehicles;
- Sediment runoff from construction/land disturbance;
- Unauthorized discharge of restaurant waste;
- Power washing;
- Unauthorized discharge of industrial waste;
- Vehicle washing; and
- Wash water/ grey water.

**4.1.C** The MS4 Operator must utilize appropriate educational resources to be used as BMPs (materials, events, activities, etc.) in conjunction with the selected pollutants for the selected target audiences.

- The MS4 Operator may change BMPs during the permit cycle if determined appropriate through tracking and adaptive management reviews show a different BMP may be more effective for the MS4. Any changes shall be reflected in the SWMP and explained in the MS4 Stormwater Management Program Report.

	BMP	Target Pollutant	Target Audience	Permit year
Group A, B, & C				
Group A, B, & C				
Group B, & C				
Group B, & C				
Group C				

1. Using **Table III**, over the permit term the MS4 Operator shall implement a minimum of the following, including the tracking and adaptive management processes:

**Group A: Each permit cycle; two (2) education and outreach BMPs from Table III.**

**Group B: Each permit cycle; four (4) education and outreach BMPs from Table III.**

**Group C: Each permit cycle; five (5) education and outreach BMPs from Table III.**

**Table III - Outreach and Education BMPs**

	BMPs:	Measurable goals (The quantity or frequency required to count as a full BMP)	Tracking & Adaptive Management
1	Information on the MS4 Operator's website;	Maintain a webpage with up to date information, & working links. All links shall be checked, and the page shall be updated as necessary at minimum annually. Must be maintained the entire year.	The number of hits shall be tracked. The MS4 Operator shall use this to see which messages get reactions, and if certain messages may need more education.
2	Social Media posts, social media campaign;	Post a minimum of four (4) times a year, on a minimum of one social media platform. The messages shall address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff. The messages shall be seasonally	The number of views, impressions, and other interactions shall be tracked. The MS4 Operator shall use this to see which messages get reactions, and if certain messages may need more education.

		appropriate. Must be continued for the full year.	
3	Maintain, or mark storm inlet with “No Dumping – Drains to Stream” or similar message. In addition to, or instead of, permanent wording cast into the structure of the inlet;	Placard, stencil, or paint, a minimum of 10% of all known stormwater inlets in the MS4 area per year.	Number of inlets, the location of the inlets and how they were marked shall be tracked. These areas shall be noted on MCM #3 dry weather screenings, and illicit discharge investigations as a method to determine if the markings are effective or if areas could benefit from the markings.
4	Require installation of permanent embossed, or precast inlets with “No Dumping-Drains to Stream” or similar message.	Requirement for all new inlets in the MS4 area.	Number of inlets, the location of the inlets shall be tracked. These areas shall be noted on MCM #3 dry weather screenings, and illicit discharge investigations as a method to determine if the markings are effective or if areas could benefit from the markings
5	Media/ advertising campaign: Billboard; Bus shelter/ bench; radio/ television/ movie theatre/ areas of high visibility.	Develop topics that address activities and/or pollutants of concern. Advertisement must be active for a minimum of three weeks; OR must have an estimated exposure for the duration of the campaign that is 2 times the most recent U.S. Census Bureau decennial population value for the permit area.	To the extent possible, evaluate the pollutant before the advertising campaign, and again after to see if there has been a change. The dates, time, and/or estimated media exposure for each spot broadcast shall be documented. Consider including a mechanism to track active response such as a QR Code, following the social media account(s) or a website to visit. Track those responses to determine if the advertisement was effective in reaching people.
6	Publish articles in local newsletter, may be electronic;	Develop topics that are group specific and address activities and or pollutants of concern at a seasonally appropriate time. A minimum of two articles annually shall be published or emailed.	To the extent possible evaluate the pollutant before the article, and again after to see if there has been a change. Consider including a mechanism to track active response such as following the social media account or a website to visit. Track those

			responses to determine if the article was effective in reaching people.
7	Permanent Stormwater related signage;	Place signage in a location where the message is relevant, and highly-visible to target audience. Signage will count as an annual BMP for the year it was put in place and for each subsequent year of this permit cycle as long as each of those years tracking is taking place to message effectiveness and to ensure the signage is maintained.	Evaluate the pollutant before the signage, and again after to see if there has been a change. Consider including a mechanism to track active response such as following on social media, a QR Code, or a website to visit. Track those responses to determine if the signage was effective in reaching people.
8	Promote, host, or develop educational meetings, seminars, or trainings;	The events shall address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff. A minimum of two events shall be held, hosted or promoted annually. These events may address different pollutants/audiences.	Attendance, and any distributed education materials shall be tracked. This shall be used to gauge interest in the topic. Consider using a questionnaire or follow up survey to track if the attendees retained information or found the event beneficial.
9	Fact sheets/ brochures/ utility bill insert/ door hangers.	The sum of all fact sheets, brochures, bill inserts, handouts, or e-mails distributed in one year shall be at minimum equal to the most recent U.S. Census Bureau decennial housing units value for the permit area.	The applicable U.S. Census housing units value shall be recorded, and the amount of material shall be recorded.  This may be a combination of materials, using a targeted approach to get the appropriate material to the applicable audience.
10	Paid membership in a regional or watershed group.	The organization must focus on stormwater runoff.	The group may enact BMPs on behalf of all members, the permittee must participate to ensure their MS4 has representation, and receives some of the educational BMPs.
11	Targeted education campaign, via mail, email, or in person.	Minimum of one annually OR with a specific event.  (Examples: Sediment control with small building permit; leaf litter email during street sweeping season, or education brochure to all businesses conducting certain activity.)	Education material distributed, or amount of people contacted shall be tracked. Follow up on if noticeable behavior has changed.

- 4.1.D** The MS4 Operator must create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the Stormwater Management Program. The activities, (BMPs) must have an effort to impact stormwater runoff by improving water quality.

	BMP	Measurable Goal	Adaptive management	Permit year	MS4 Operator support (4.1.E)
Group A, B, & C					
Group B, & C					
Group C					

**Group A: Each permit cycle; one (1) involvement BMP from Table IV.**

**Group B: Each permit cycle; two (2) involvement BMPs from Table IV.**

**Group C: Each permit cycle; three (3) involvement BMPs from Table IV.**

**Co-permittees: Each permit cycle; one (1) involvement BMP in the boundaries of each co-permit.**

**Table IV Involvement BMPs**

BMPs	Measurable goals (The quantity or frequency required to count as a full BMP)	Tracking & Adaptive Management
Stream/lake or Watershed clean-up events; Litter clean-up events such as Missouri Stream Team, Adopt-A-Spot, Adopt-A-Street, Adopt-A-Stream;	To be considered an event, the land area cleaned must be at minimum 2 acres, or 400 yards of stream/ streambank/ watershed, or 2 miles of road side. (These may be combined such as 1 acre of land and 200 yards of stream.)	Track the area or distance cleaned (by acre, yard or lane miles), the amount of waste removed (by tonnage, cubic yard, or Stream Team bag count) and the attendance. Use the waste measurements to determine if there are priority areas for litter entering stormwater, or areas for illegal dumping.

Habitat improvement; Tree planting; Invasive vegetation removal; Stream restoration.	To be considered an event, the project must be a minimum of .5 acres or 25 yards. These may be a combination. This may take place in streams, parks, areas adjacent to public waterways, and/or other green space.	Track the location(s) along with the amount planted or remove, or miles improved or restored. Analyzing the areas improved upon, the MS4 Operator shall see if there are opportunities to join the improve areas, or work on a watershed basis.
Volunteer water quality monitoring;	To be considered an event, the monitoring must be conducted at minimum once a year.	Record the sites for the volunteers, what parameters were measured/monitored, and the dates of the monitoring.
* Hold events to train residents, or work a project for homeowner associations (HOAs), or other public groups. The event or training must cover stormwater related topics such as: building rain barrels; Fertilizer application training; Rain garden/ bio retention creation or maintenance; How to recognize illicit discharge activities and communicate observations to appropriate MS4 staff.	Provide one project or training at minimum annually.	Record the attendance, the topic covered, and any training materials distributed. Use these numbers and interactions during the event to determine if the project or training covered a topic of interest and/or a topic that could be brought to a different or wider audience.
School, public event, etc. educational display/booth; Provide information or displays that work to improve public understanding of issues related to water quality.	Provide one booth or display at minimum annually. The booth or display must be staffed by staff of the MS4 at minimum 50% of the time the event is open to the public.	Record the number of interactions, the overall attendance, or the number of hours the event was staffed. Record the topic covered, and any educational materials distributed. Use these numbers and interactions during the event to determine if the project or training covered a topic of interest and/or a topic that could be brought to a different or wider audience.
Stormwater related speaker series;	Provide a minimum of two sessions a year. These may be different speakers and/or audiences.	Record the attendance, the topic covered, and any training materials distributed. Use these numbers and interactions during the event to determine if the project or training covered a topic of interest and/or a topic that could be brought to a different or wider audience.

Ongoing yard waste collection, designated yard waste collection area, household hazardous waste collection, or street sweeping program.	Provide the service as an annual occurrence or at readily accessible location. For street sweeping, this shall be conducted at minimum twice a year.	Track the amount collected. If educational information is being used in conjunction with this activity track for changes due to the education. Tracking can be used with illicit discharge tracking, to determine if the rate of this type of discharges or dumping were reduced.
MS4 area wide stormwater survey.	A series of public survey to establish a baseline in the first year of the permit and then a minimum of annually throughout the permit cycle.	Use the same or similar questions to evaluate BMPs and/or full program effectiveness. Surveys can be done with utility bills, online, social media, or a combination. All participation should be tracked.

**4.1.E** The MS4 Operator shall create or support the involvement BMP(s) in Section 4.1.D.

-See table above

**4.1.F** Using adaptive management as required in parts 4.1.A.3.d and 4.1.B.1.c, all MS4 Operators shall review their Public Education and Outreach on Stormwater Impacts Program, at minimum, annually and update implementation procedures and/or BMPs as necessary within the requirements of this permit.

This may be conducted when preparing the annual MS4 Stormwater Management Program Report for submittal to the Department.

Annual review of MCM 1			
Year reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2021			
2022			
2023			
2024			
2025			

**4.2 MCM 2. Public Participation**

The permittee shall develop and implement a comprehensive public participation program that provides opportunities for public participation in the development and oversight of the permittee's Stormwater Program.

This program must provide opportunities for public participation of the permittee's permit renewal and shall, at a minimum, comply with any state and local public notice requirements. Additionally, the program must provide opportunities for public participation in activities related to developing and implementing the Stormwater Management Program.

The public participation program shall, at a minimum include the following:

- 4.2.A** The MS4 Operator shall hold a public notice period for a minimum of thirty (30) days to allow the public to review the draft permit, and description of the MS4s Stormwater Management Program (this may be the SWMP) prior to the submission of the renewal application to the Department.
- 4.2.B** As part of the public notice, if the MS4 Operator has a public website, the required items shall be posted on their website with a way to submit comments, along with the standard public notice methods for the MS4.
  - 1. The permittee shall respond to comments received during the comment period.
  - 2. The MS4 Operator shall retain copies of any public comments and records of information submitted by the public received as part of the public notice process. These comments and responses shall be made available to the public or the Department upon request.
- 4.2.C** The MS4 Operator shall hold a public information meeting to provide information on, or describe the contents of, the proposed Stormwater Management Program. This meeting shall be advertised at least thirty (30) days prior to the public meeting.
  - 1. As part of the notice of public meeting, if the MS4 Operator has a public website, the MS4 Operator shall post on that site, along with the standard public notice methods for the MS4. The notice of the public informational meeting, including the date, time and location.
  - 2. The meeting must be held within the service area of the MS4. Co-permittees shall hold the meeting within the boundaries of each co-permittee.

Dates of public notice:  
 Dates of notice of meeting:  
 Date of meeting:  
 Location (or virtual):

- 4.2.D** The MS4 Operator shall have a publicly available method to accept public inquiries, or concerns, and to take information provided by the public about stormwater and stormwater related topics.

Method used to accept public inquiries or concerns:

Explain how these reports are tracked.

- 4.2.E** If the MS4 Operator utilizes a stormwater management panel or committee, the MS4 Operator shall provide opportunities for citizen representatives on the panel or committee. The attendance of the meeting shall be recorded.

	Does the MS4 Operator utilize a stormwater management panel?	If yes, were opportunities for citizen representation provided?	Are there any citizens on the panel?
Permit year 1:			
Permit year 2:			
Permit year 3:			
Permit year 4:			
Permit year 5:			

- 4.2.F** If the permittee has a governing board such as; County Council, City Council, or Board of Curators, a representative of the MS4 Operator, who is familiar with the MS4 Stormwater Program, shall provide an update to the governing board. This shall be conducted at minimum, annually with the status of, or updates on, the Stormwater Management Program, and compliance with the Stormwater Management Program.

	Date the governing board was updated	Method used to update the governing board	Name of MS4 representative(s)
Permit year 1:			
Permit year 2:			

Permit year 3:			
Permit year 4:			
Permit year 5:			

- 4.2.I** Using adaptive management, all MS4 Operators shall review their Public Participation Program, at minimum, annually and update implementation procedures as necessary within the requirements of this permit. This shall be used to review how to best reach the public, the effectiveness of the mechanisms, the effectiveness of reaching the public and the MS4 Governing board and if the community and MS4 government are working together for water quality. Any additional events and/or BMPs shall be acknowledged in the Stormwater Management Program report.

Annual review of MCM 2			
Year being reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2021			
2022			
2023			
2024			
2025			

**4.3 MCM 3. Illicit Discharge Detection and Elimination (IDDE)**

The MS4 Operator shall implement, and enforce a program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200 at 40 CFR 122.26(b)(2)) into the regulated MS4.

The illicit discharge detection and elimination program shall at minimum, include the following:

**4.3.A** A current storm sewer system map that shall be updated as needed to include features which are added, removed, or changed. This map may be paper or electronic.

This storm sewer map, must show at a minimum:

1. The location of all MS4 outfalls. Completed:
  - ☐ Yes
  - ☒ No; Explain your schedule to complete (Only newly regulated MS4s or enforcement agreement):
2. The names and locations of all receiving waters of the state that receive discharges from the MS4 outfalls. Completed:
  - ☐ Yes
  - ☒ No; Explain your schedule to complete (Only newly regulated MS4s or enforcement agreement):
3. The boundary of the regulated MS4 area. Completed:
  - ☐ Yes
  - ☐ No; Explain your schedule to complete (Only newly regulated MS4s or enforcement agreement):
4. The map shall be readily available & used by field staff as needed.
  - ☐ Yes
  - ☒ No; Explain your schedule to complete (Only newly regulated MS4s or enforcement agreement):

**4.3.B** The MS4 Operator must record the sources of information used for the map and track, at minimum:

- ☐ A numbering or naming system of all outfalls;
- ☐ Dates that the outfall locations were verified/ or last field survey;
- ☐ For newly added outfalls, the date that it was added to the storm sewer system.

**4.3.C** The MS4 shall effectively prohibit non-stormwater discharges into the permittee's storm sewer system and implement appropriate enforcement procedures and actions.

Attach a copy of, or include a link to the applicable ordinance:

Attach a copy of, or include a link to the enforcement procedures and actions:

#### 4.3.D A dry weather field screening strategy.

##### Checklist minimums:

- Date and time;
- Weather conditions and temperature (air & water);
- Color of discharge;
- Estimate of flow rate (this may be noted qualitatively);
- Odor;
- Surface scum, algal bloom, floatables or oil sheen present;
- Deposits or stains (note the color);
- Turbidity (may be noted qualitatively);
- Stream impact including vegetation, fish, wildlife;
- Length of impacted stream; and
- Notes of an obvious source of flow (such as lawn irrigation, etc.)
- Other \_\_\_\_\_

1. The MS4 Operator shall conduct (or have conducted on their behalf) outfall field assessments.

The screening shall be conducted during dry weather conditions (a minimum of 72 hours after the last precipitation event) to check for the presence of a discharge.

Total % of all outfalls to be screened during the permit cycle (minimum of 60% for existing permittees): \_\_\_\_\_

	Amount (% or #) per year of permit cycle	Any specific priority areas included:
Permit year 1:		
Permit year 2:		
Permit year 3:		
Permit year 4:		
Permit year 5:		

2. Dry weather screening shall include a checklist or other tracking device to; ensure a complete inspection of each outfall, enhance consistency, and to track the field screening. When discharge is present, the checklist or tracking device shall note the following general observations and physical characteristics at a minimum:

#### Checklist minimums

- Date and time;
- Weather conditions and temperature (air & water);
- Color of discharge;
- Estimate of flow rate (this may be noted qualitatively);
- Odor;
- Surface scum, algal bloom, floatables or oil sheen present;
- Deposits or stains (note the color);
- Turbidity (may be noted qualitatively);
- Stream impact including vegetation, fish, wildlife;
- Length of impacted stream; and
- Notes of an obvious source of flow (such as lawn irrigation, etc.)

**4.3.E** The MS4 Operator shall maintain diagnostic monitoring procedures to detect and investigate unknown non-stormwater flows as part of the dry weather screening program.

Ensure the following is either listed above or in a separate document:

1. Description of dry weather field screening strategy to detect and address non-stormwater discharges, including discharges from illegal dumping and spills, to the permittee's system.
2. Description of how the discharge is evaluated and the possible parameters tested.
3. If contracted to another entity, the contact information.

Attach a copy of, or explain (or list) what parameters are sampled for and how the decision is made on what to sample for.

- 4.3.F** The MS4 Operator shall maintain procedures for tracing the source of an illicit discharge. If initial screening indicates that a dry weather discharge contains pollutants, or if an illicit discharge is suspected from another reporting method, the source shall be traced.

Attach a copy of, or explain procedures for tracing the source of an illicit discharge, and mechanisms to locate and follow stormwater infrastructure. A variety of investigative tools may be used as appropriate for each situation, such as, but not limited to;

- Visually following the flow;
- Storm sewer system sampling;
- Full storm sewer map;
- Closed circuit television;
- Smoke or dye tracing; and
- Tunnel entry.

- 4.3.G** The MS4 Operator shall maintain procedures for removing the source of the discharge. After locating the source, the pollutant and source must be removed. The exact procedure will depend on the source and the circumstances,

Attach a copy of, or explain possible procedures for removing the source of the illicit discharge. Include names and contacts for environmental cleaning companies that may be used.

**4.3.H** In order to prevent further illicit discharge, the MS4 Operator shall identify priority areas

Example such as, but not limited to:

- Areas with evidence of ongoing illicit discharges;
- Areas with a past history of illicit discharges;
- Certain land use influencing stormsewer/ proximity of potential pollutant sources;
- Areas of higher population density;
- Neighborhoods with onsite sewage systems;
- Areas with known litter or dumping issues;
- Areas with large or increased number of citizen complaints; and
- Industrial areas

Annually, the MS4 Operators shall evaluate this priority area list and/or map and update as necessary to reflect changing priorities.

	Priority area(s)
Permit year 1:	
Permit year 2:	
Permit year 3:	
Permit year 4:	
Permit year 5:	

**4.3.I** The MS4 Operator shall maintain written procedures for implementing the IDDE Program, including those components described within this section, to ensure program continuity and consistency.

**4.3.J** The MS4 Operator must conduct investigations in response to field screening discoveries, spills, or in response to complaints from the public, municipal staff, or adjacent MS4s.

1. Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment.
2. Investigate within five (5) business days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge which does not constitute a threat to human health, welfare or the environment.

Attach a copy of, or explain any details on the timeline for investigations.

[illegible]

- 4.3.K** The MS4 Operator shall have procedures for appropriate enforcement, this may include fines, the ability to collect cleanup and abatement costs, and actions to ensure that the permittee's illicit discharge ordinance (or other regulatory mechanism) is being implemented.

Attach a copy of, or include a written description of the enforcement procedures. This shall include a copy of or link to the ordinance and/or other regulatory mechanism that the MS4 Operator will use to enforce the prohibition of illicit discharges into the MS4.

- 4.3.L** The MS4 Operator shall maintain a database, or other centralized system, to track dry weather field screenings, spills, incidents, and investigations.

How is tracking of dry weather field screenings, spills, incidents, and investigations being maintained?

**4.3.M** The MS4 Operator shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste, this may work with part 4.1 and part 4.6 of this permit (MCM #1 and MCM #6).

How are MS4 staff, businesses, and the general public informed of the hazards associated with illegal discharges and improper disposal of waste?

**4.3.Q** The MS4 Operator must develop and implement or maintain a training program for all municipal field staff, who, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system.

[illegible]

Reviews of the training effectiveness shall be considered after municipal site inspections or after an illicit discharge incident occurs. If a certain department or facility did not perform the way they were trained, or if an issue arises that was not handled properly, the MS4 Operator should consider if the training is enough or is ineffective. The MS4 Operator shall consider ways to survey or test staff to see if the training is effective.

If not maintained in a separate document, include reviews of training effectiveness here.

- 4.3.R** Using adaptive management the MS4 Operator shall review their IDDE Program, at minimum, annually and update implementation procedures as necessary. This data shall be used to continuously evaluate the effectiveness of each BMP and the implementation of each BMP. Any additional BMPs shall be acknowledged in the Stormwater Management Program report.

Annual review of MCM 3			
Year being reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2021			
2022			
2023			
2024			
2025			

List any additional programmatic BMPs and when they were added to the Stormwater Management Program. (Examples of programmatic BMPs include; mapping of entire stormsewer system, adopting a standard operating procedure for dry weather screening.)

**4.4 MCM 4. Construction Site Stormwater Runoff Control**

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

- 4.4.A** The MS4 Operator shall have a law, ordinance and/or other regulatory mechanism to require construction site runoff control BMPs at construction/land disturbance sites greater than or equal to one (1) acre or less than one acre if the construction activity is part of a larger common plan or development or sale that would disturb one acre or more. The mechanism shall include sanctions which are designed to ensure compliance, to the extent allowable under State, or local law.

Attach a copy of, or include a link to the ordinance or regulatory mechanism.  
This shall include a copy of or link to the ordinance and/or other regulatory mechanism that the MS4 Operator will use to enforce the construction program.

**4.4.B** The MS4 Operator shall review pre-construction plans.

The reviews shall include:

- ☐ Evaluate threats to water quality
  - a) Soil erosion potential;
  - b) Site slope;
  - c) Project size and type;
  - d) Sensitivity of receiving waterbodies;
  - e) Discharge flow type (pipe or sheet flow);
  - f) Location of discharge point in relation to receiving water;
  - g) Proximity of the site to receiving waterbodies; and
  - h) Other factors relevant to the MS4 service area.
- ☐ A checklist, or other listed criteria, shall be used to ensure consistency and completeness (attach a check list if used by plan reviewers.)
- ☐ Requirements for construction site operators to select, install, implement, and maintain appropriate stormwater control measures. This includes temporary BMPs throughout the life of the land disturbance, and permanent BMPs which remain on site as required by local codes and ordinances.
- ☐ Consider ways to minimize disturbed areas through actions such as, phased construction requirements, temporary seeding or sodding, or erosion mats to exposed areas.
- ☐ Requirements for construction site operators to control construction-site waste that may cause adverse impacts to water quality. (Trash, concrete wash-out, etc.)

**4.4.C** The MS4 Operator shall establish authority for site inspections and enforcement of control measures. To the extent allowable by state, federal, and local law, all MS4 Operators shall implement procedures for inspecting construction/land disturbance projects.

The construction site runoff control program shall:

- ☐ Identify priority sites for inspection based on nature of the construction activity, topography, disturbed area, and the characteristics of soils and sensitivity of, or proximity to, receiving water.
- ☐ Construction site inspections shall include assessment of compliance with the MS4 Operator's construction site storm water runoff control ordinance or regulatory mechanism, and other applicable ordinances.
- ☐ The inspections shall evaluate any structure that functions to prevent pollution of stormwater or to remove pollutants from stormwater and use enforcement polices to require BMPs are implemented and effective.
- ☐ Final inspection, upon completion of the land disturbance and prior to final approval of construction project. Ensure all disturbed areas have been stabilized, that all temporary erosion and sediment control measures are removed.
- ☐ The inspections conducted by the MS4 Operator shall be documented with a checklist. The checklist must include structural BMPs and check on the self-inspection which are conducted by the construction site operator. These MS4 Operator checklists may be electronic.
- ☐ Include a copy of or a link to the checklist.

**4.4.D** The construction site runoff control program shall include an established, escalating enforcement policy that clearly describes the action to be taken for violations.

The program shall have written procedures to ensure compliance with the MS4 Operator's construction site runoff control regulatory mechanism.

Attach a copy of, or include a link to the escalating enforcement policy.

Attach a copy of, or include a link to the applicable ordinance or regulatory mechanisms.

Include the sanctions and/or enforcement mechanisms. The MS4 Operator must have a minimum of two (2) enforcement actions.

**4.4.E** The MS4 Operator shall require the construction site operator to conduct inspections at minimum:

1. Every fourteen (14) days, when construction is active.
2. Within 72 hours of any storm event, and within 48 hours after any storm event equal to or greater than a 2-year, 24-hour storm has ceased.

Checklists used for these inspections conducted by construction site operators shall either be submitted to the MS4 Operator, or the MS4 Operator shall verify that these inspections are being conducted by the construction site operator checklists during MS4 Operator inspections.

Attach a copy of, or include a written description of the inspection requirements for construction site operators:

How are the checklists used by the construction site operators verified: (submitted or verified on site?)

- 4.4.F** The MS4 Operator shall maintain an inventory of active public and private land disturbance sites, as defined in Section 4.4 of this permit. This may be supplemented with records such as a plan review checklist and email correspondence.

Explain how the inventory is maintained:

The inventory must contain:

- ☐ Relevant contact information for each project (e.g., tracking number, name, address, phone, etc.);
- ☐ Size of the project/ area of disturbance;
- ☐ If the site is a priority site/ how high of priority;

- 4.4.G** The MS4 Operator shall track their oversight inspections. This may be done by retaining copies of records such as inspection checklists and email correspondence. The MS4 Operator must make these inventories available to the Department upon request.

Explain how the tracking is maintained:

The tracking must contain at a minimum:

- ☐ Inspection dates and time;
- ☐ Inspector name;
- ☐ Inspection findings; and,
- ☐ Follow up actions and dates, including corrective actions and enforcement actions.




- 4.4.L** The MS4 Operator must provide written procedures outlining the local inspection and enforcement procedures to their inspectors to ensure consistency among the inspections.

Attach a copy of, or include a written description of the local inspection and enforcement procedures to their inspectors to ensure consistency among the inspections.

- 4.4.M** Using adaptive management, all MS4 Operators shall review, at minimum annually, their Construction Site Stormwater Runoff Control Program and evaluate the ordinances, review procedures, inspection procedures, enforcement procedures, receipt of public information procedures, and effectiveness of training procedures to ensure compliance with these requirements and determine if changes are needed.

Annual review of MCM 4			
Year being reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2021			
2022			
2023			
2024			
2025			

This annual review may include but is not limited to the follow.

- ☐ Evaluating the most common violations, how the violations are handled, how many are escalated;
- ☐ If the education program can assist in reducing violations;
- ☐ Determining if the site plans match the sites when violations arise or if additional items need to be evaluated at plan review;
- ☐ Assessing public complaints being addressed in a timely manner; and
- ☐ Evaluating if the inspections thorough and consistent across different sites.

List any additional programmatic BMPs and when they were added to the Stormwater Management Program. (Examples of programmatic BMPs include; onsite preconstruction visit, adopting a standard operating procedure for enforcement measures.)

**4.5 MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment**

The MS4 Operator shall continue or develop, implement, and enforce a program to address the quality of long-term stormwater runoff from new development and redevelopment projects that disturb equal to and greater than one acre, including projects less than one acre that are part of a larger common plan of development or sale that would disturb one acre or more and that discharge into the regulated MS4. The MS4's program shall ensure that controls are in place that have been designed and implemented to prevent or minimize water quality impacts

- 4.5.A** The MS4 Operator shall maintain and utilize an ordinance(s) or other regulatory mechanism(s) to address post-construction runoff from new development and redevelopment projects to the extent allowable under state or local law for sites equal to or greater than one acre including projects less than one acre that are part of a larger common plan of development or sale.

If not maintained separately, include a written description of the ordinance or regulatory mechanism.

This shall include a copy of or link to the ordinance and/or other regulatory mechanism that the MS4 Operator will use to enforce the post-construction program.

**4.5.B** The MS4 Operator shall continue or develop a strategy to minimize water quality impacts. This shall include a combination of structural and/or non-structural controls (BMPs) appropriate for the permittee's community.

1. Structural controls include but are not limited to; extended detention basins, grass swales, bio-retention, permeable surfaces, sand filter basins, stormwater planters, proprietary BMPs.

The ordinance or regulatory mechanism for structural post-construction controls, or water quality facilities, shall include:

☐ Adoption or development of numeric or technical performance and/or design standards to control post-construction stormwater discharges.

These post-construction stormwater standards are for designing, installing, implementing, and maintaining stormwater control measures which may include, but are not limited to BMPs that; infiltrate, evapo-transpire, harvest, detain, retain, and/or reuse stormwater.

The MS4 Operator must adopt or maintain local stormwater discharge design standards that consider parameters such as; site discharge volume, rate, duration, and frequency for new development and redevelopment sites with the intent to minimize the impact of stormwater runoff on water quality.

2. Non-structural controls include but are not limited to; stream buffers, no mow zones, preservation of open spaces, tree preservation, impervious cover reduction, land use planning, and low impact development.

The ordinance(s) or regulatory mechanism(s) for non-structural Post-Construction controls, shall include:

Adoption or development of preventative actions that involve management and source controls such as, but not limited to:

☐ Policies and ordinances that provide requirements and standards to direct development to identified areas;

☐ Protection of sensitive areas such as wetlands and riparian areas;

☐ Maintain and/or increase open space (which may include a dedicated funding source for open space acquisition);

☐ Maintain requirements for buffer zones along water bodies;

☐ Require minimizing impervious surfaces;

☐ Require minimizing disturbance of soils and vegetation;

☐ Policies or ordinances that encourage infill development in higher density urban areas, and areas with existing infrastructure;

☐ Programs which incentivize the use of green infrastructure;

☐ Requirements for minimization of directly connected impervious areas; and

☐ Tree preservation ordinances.

☐ Other \_\_\_\_\_

**4.5.C** Pre-construction plan review shall be conducted by the MS4 Operator to assess site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance.

The structural or non-structural controls chosen shall; protect sensitive areas, minimize the creation of stormwater pollution, and effectively reduce stormwater pollution. This can be achieved by reasonably mimicking pre-construction runoff conditions on all affected new development projects, or the permittee may achieve this goal through a method more appropriate for its community.

- ☐ The plan review process shall use a checklist. This may be part of the same plan review in MCM 4. Attach a copy of the checklist.
- ☐ The plan review process shall evaluate non-structural BMP selection first, such as comprehensive plans, zoning ordinances, buffer strips, and/or maximization/preservation of open space.

**4.5.D** The MS4 Operator shall have ordinances or similar enforcement mechanisms to ensure adequate long-term operation and maintenance (O&M) of the selected BMPs, including, as appropriate, agreements between the MS4 Operator and other parties such as post-development landowners or regional authorities.

If not maintained separately, include a copy of or link to the ordinance or regulatory mechanism to ensure long-term O&M.

- ☐ Long term O&M shall be addressed during the plan review and approval process.
- ☐ Copies of O&M manuals shall be retained by the party responsible for the post-construction BMP, and with the MS4 Operator. This may be done electronically.

**4.5.E** The MS4 Operator shall inspect, or require inspection of, each water quality structural and non-structural water post-construction BMP according to the following at minimum:

- ☐ A minimum of one (1) inspection shall be conducted during construction, and one (1) inspection before the site is finalized, to verify water quality facilities are built as designed and any applicable boundaries or practices for non-structural BMPs are being observed. This may be conducted in combination with MCM 4 inspections.
  - The MS4 inspector shall have access to the approved plans to ensure proper installation.
- ☐ A minimum of once in the first three years after the installation by, the MS4 Operator.
- ☐ Annually by the owner or operator of the post-construction BMP, or by the MS4 Operator. If completed by the BMP owner or operator, this inspection report shall be submitted to the MS4 Operator for evaluation and review.
- ☐ The MS4 Operator shall inspect a minimum of 60% of all water quality post-construction BMPs within the five year permit cycle. This must include installations with ongoing or open enforcement issues.

**4.5.F** The MS4 Operator must maintain a plan designed to ensure compliance with the MS4's post-construction water quality regulatory mechanism. This plan shall include escalating enforcement mechanisms the MS4 Operator will use to ensure compliance.  
The MS4 Operator must have the authority to initiate a range of enforcement actions to address the variability and severity of noncompliance.

Attach a copy of, or include a written description of the escalating enforcement policy and mechanisms.

1. Enforcement responses to violations must consider at minimum:

- ☐ Degree and duration of the violation;
- ☐ Effect the violation has on the receiving water;
- ☐ Compliance history of the post-construction BMP owner or operator; and
- ☐ Cooperation of the owner or operator with compliance efforts.

**4.5.G** Enforcement actions shall be timely in order to ensure the actions are effective. The MS4 Operator shall begin enforcement actions within thirty (30) days of discovering a violation.

Attach a copy of, or include a written description of the enforcement actions and response times:

The MS4 Operator shall maintain a minimum of two possible sanctions. These include, but are not limited to:

1. Education regarding the BMP and verbal warnings;
2. Written warnings or notice of violation (this includes email notification);
3. Property lien; and
4. Fines.
5. Other \_\_\_\_\_

**4.5.H** The MS4 Operator shall maintain an inventory tracking the water quality post-construction BMPs.

Explain how the inventory is maintained:

The inventory must contain:

- ☐ Relevant contact information for each project (e.g., tracking number, name, address, phone, etc.);
- ☐ The type of post-construction BMP;
- ☐ Applicable operations and maintenance documents;
- ☐ Date the MS4 Operator approved the construction site plan; and,
- ☐ If the water quality facility is owned or operated by the MS4, the tracking shall also include any maintenance, such as sediment clean-out or replanting.

**4.5.I** The MS4 Operator shall also track the post-construction BMP inspections. This may be done by retaining copies of records such as inspection checklists and email correspondence. The MS4 Operator must make these inventories available to the Department upon request.

Explain how the tracking is maintained:

The tracking must contain at a minimum:

- ☐ Inspection dates and time;
- ☐ Inspector name;
- ☐ Inspection findings; and,
- ☐ Follow up actions and dates, including corrective actions and enforcement actions.

**4.5.J Existing permittees:** Evaluate the ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures to ensure compliance with these requirements and determine if changes are needed. Any changes necessary to be in compliance with this permit shall be completed within the first two (2) years of permit issuance.



- 4.5.M** Using adaptive management, all MS4 Operators shall review, at minimum annually, their Post-Construction Site Stormwater Management in New Development and Redevelopment Program and evaluate effectiveness of the overall program and determine if changes are needed.

Annual review of MCM 4			
Year being reviewed	Date of review	Reviewer(s)	Were changes made and noted above?
2021			
2022			
2023			
2024			
2025			

This annual review may include but is not limited to the following.

- ☐ Reviewing the number and types of developments;
- ☐ How many BMPs were installed/inspected;
- ☐ The amount of watershed area being treated;
- ☐ The types of violations found and how frequently; and
- ☐ Evaluating how education could improve the effectiveness of the program.

Any additional programmatic BMPs shall be acknowledged in the Stormwater Management Program Report. (Examples of programmatic BMPs include; educational meetings with HOAs, onsite educational visits, adopting a standard operating procedure for enforcement measures.)

#### 4.6. MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

The permittee shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

- 4.6.A** The MS4 Operator shall maintain and utilize an employee training program for MS4 municipal operations staff. The training shall be given at minimum annually to all MS4 staff who work with material handling, at MS4 owned or operated vehicle/equipment maintenance areas, storage yards, and material storage facilities. This may be broken up into staff units, or by applicable topics.

[illegible]

**4.6.B** The training shall be used to prevent and reduce stormwater pollution.

The training shall cover a minimum of the following topics/ activities (if applicable to the MS4):

Unless maintained in a separate document:			
Topic	Years covered in training	Departments trained	Number of staff trained
1. Vehicle and equipment washing			
2. Fluid disposal and spills			
3. Fleet, equipment, and building maintenance			
4. Park and open space maintenance procedures (including fertilizer, herbicide, pesticide application)			
5. New construction, road maintenance, and land disturbances			
6. Stormwater system maintenance			
7. MS4 operated salt and de-icing operations			
8. Fueling			
9. Solid waste disposal			
10. Street sweeper operations			
11. Illicit Discharges			
other			
other			

**4.6.C** The MS4 Operator shall:

- ☐ Maintain material to use in the training program, such as those available from the EPA, the state, or other organizations.
- ☐ Unless maintained separately, include a written procedures for the training program. Include a description of how this training will coordinate with all other minimum control measures (such as Illicit Discharge), monitoring and TMDL implementations where applicable.
- ☐ Unless maintained separately, include a written schedule to offer topic specific training when it is appropriate. Such as, swimming pool discharges in the summer, leaf disposal in the fall, proper salt clean-up and usage in the winter.

[illegible]

This includes Municipal projects with a land disturbance permit, wastewater facilities, airports, etc. NPDES permitted facilities not owned or operated by the permittee are not required to be part of the list, however the MS4 Operator should be familiar with all such facilities in their MS4 service area as they may signify a priority area for the IDDE program.

[illegible]

**4.6.F** The MS4 Operator shall develop or maintain controls for reducing or eliminating the discharge of floatables and pollutants from municipal facilities listed in Section 4.6.D and 4.6.E.

These controls shall include at a minimum, where applicable:

- ☐ A list of potential pollutant sources at each facility, such as materials used and stored on site.
- ☐ A minimum of annual inspections of all municipally owned or operated facilities for stormwater issues.
  - Records shall be kept for inspections and follow up. This may be a checklist, and may be electronic.
- ☐ Use of structural controls/BMPs to reduce or prevent pollutants from entering waters of the state or into another MS4 where needed.
  - A map with descriptions of these BMPs shall be maintained for each facility.
- ☐ All paints, solvents, petroleum products, and petroleum waste products (except fuels) under the control of the permittee shall be stored so these materials are not exposed to stormwater.
- ☐ Sufficient practices of spill prevention, control, and/or management shall be provided to prevent any spill of these pollutants from entering waters of the state;
  - This shall include spill kits when liquid product is stored at a facility; and
  - Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater.
- ☐ Tracking of rock salt/brine or other deicer usage.
- ☐ Maintaining municipal salt storage area(s) after use of rock salt, at minimum:
  - Sweep and/or shovel spillage in loading area and storage area, and
  - Unload salt hoppers or keep under cover when salt is in the hopper.

**4.6.G** The MS4 Operator shall have procedures for proper disposal of waste removed from the MS4 structures and areas of jurisdiction.

This waste, shall include at minimum, if applicable to the permittee:

- ☐ Street sweeper spoils and washout;
- ☐ Accumulated sediment;
- ☐ Dredged materials;
- ☐ Floatables, trash and litter;
- ☐ Leaves, other organic matter; and
- ☐ Other debris.

**4.6.H** The MS4 Operator shall maintain and utilize the following procedures, at minimum, for the washing of all municipal vehicles and equipment (if applicable to the MS4):

- ☐ Use of any soap or detergent shall only be where there is connection to sanitary sewer or equivalent treatment; and
- ☐ Any wash or rinse water that contains pollutants such as salt, oils, grease, sediment, grass clippings, lawn chemicals, or pesticides shall not be discharged to waters of the state or the MS4 system without appropriate treatment.
- ☐ Any washing or rinsing activities shall be conducted in an appropriate area so the water is treated. This area(s) shall be marked on the map of the facility.

Explain how washing of vehicles and equipment is conducted:

- 4.6.I** The MS4 Operator shall maintain written explanation of the controls, procedures, inspection schedules, and explanation of tracking of these controls. Tracking may be done by retaining inspection reports or checklists.

Individual Stormwater Pollution Prevention Plans (SWPPP) or one overarching Operations and Maintenance Manual (O&M Manual) for all applicable MS4 facilities may be used to comply with this requirement.

- ☐ Individual SWPPPs
- ☐ One O&M Manual
- ☐ Other written explanation of controls, procedures, inspection schedules, and explanation of tracking (inspection reports or checklists).

Annually, the MS4 Operator shall evaluate the results, controls, and inspection procedures to ensure compliance with these requirements and determine if changes are needed. This evaluation may also aid in finding priority areas or pollutants in relation to MCM 3, or adding more education in relation to MCM 1.

[illegible]

- 4.6.J** The MS4 Operator shall maintain procedures to determine if there are impacts to water quality for new flood management projects, if applicable. Any flood management projects shall require the protection of water quality in the standards that are used to plan, design, build, and maintain stormwater infrastructure.

Flood management projects are those projects developed or designed to reduce flooding.

Attach a copy of, or include a written description of the procedures to determine if there are impacts to water quality for new flood management projects here.

Have there been any such flood management projects to review?		
Year	Yes/no	If yes, the location(s)
2021		
2022		
2023		
2024		
2025		

- 4.6.K Existing permittees:** Shall evaluate the current Stormwater Management Program including training, inspection procedures, and other municipal operation procedures to ensure compliance with these requirements. Any changes necessary to be in compliance with this permit shall be completed within one (1) year of this permit issuance.
- 4.6.L Newly regulated permittees:** Shall develop this program. The SWMP shall describe the pollution prevention/ good housekeeping plan and scheduled implementation. Development of this program shall be completed within the first five (5) years of the permit issuance.

**4.6.M** Using adaptive management, all MS4 Operators shall review their Municipal Operations Program, at minimum, annually and update implementation procedures as necessary within the permit requirement.

Annual review of MCM 6			
Year being reviewed	Date of review	Reviewer(s)	Were changes made and noted above?
2021			
2022			
2023			
2024			
2025			

List any additional programmatic BMPs and when they were added to the Stormwater Management Program. (Examples of programmatic BMPs include; New training program, adopting a standard operating procedure for equipment cleaning.)

### 5.3 MS4 Stormwater Management Program Report

- 5.3.A** A report to the Department on the status of the MS4's program is due annually on or before February 28th. This report shall cover the previous year from January 1<sup>st</sup> to December 31<sup>st</sup>. The report shall be submitted on the Department approved, MS4 Stormwater Management Program Report form. If approved by the Department, permittees may submit the MS4 Stormwater Management Program Report using an alternative report format. The MS4 Operator shall submit the MS4 Stormwater Management Program

The annual reports must be submitted through the eDMR system. This is accessible through the Missouri Gateway for Environmental Management (MoGEM): <https://dnr.mo.gov/mogem/>

Who has access to the eDMR system?	
NAME	Role in the eDMR system

