



Capitol Region Watershed District

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October 14, 2011

Anne Weber
City of Saint Paul Department of Public Works
25 W. Fourth St., 700 CHA
Saint Paul, MN 55102

Re: Comments on the City of Saint Paul's Stormwater Permit Annual Report

Dear Ms. Weber:

Capitol Region Watershed District (CRWD) appreciates the opportunity to review the City of Saint Paul's Draft Stormwater Permit Annual Report - 2011 Stormwater Management Program and 2010 Activities. CRWD commends the City for preparing a more thorough, detailed annual report in comparison to previous annual reports. However, the report lacks specificity of the progress made towards achieving the goals and requirements of the City's permit on several aspects of stormwater management including: 1) post-construction stormwater best management practices (BMPs) 2) construction site runoff erosion and sediment control; and 3) illicit discharge detection and elimination. These areas were also identified in US EPA's MS4 Compliance Inspection Report, dated January 2010, as being inconsistent between the City's permit and the City's implementation of their MS4 program. CRWD comments described below are focused on these three areas.

Post-Construction Stormwater BMPs

For the first time in its annual report in Section 1. Storm Sewer Management, the City lists the BMPs completed under the City's Water Quality Initiatives. CRWD finds this list to be helpful in assessing the progress made by the City in stormwater management, however, CRWD believes it is an incomplete inventory. For example, it appears only the BMPs constructed by Public Works - Sewers are included in this inventory. CRWD is aware of other BMPs constructed by Public Works - Streets and Parks and Recreation Departments. CRWD recommends that the City provide a full inventory of all BMPs constructed and anticipated BMPs to be constructed in 2011/2012. The inventory should include a table and map of the BMPs and maintenance schedule and completed maintenance activities for each BMP. This information would be useful in ascertaining whether or not the City is ensuring that adequate BMPs are being implemented and maintained at public (and private) construction sites, which was identified as a deficiency in the MS4 Compliance Inspection Report.

Construction Site Runoff Erosion and Sediment Control

In this annual report, the City focuses on providing a description of its site plan review process and site inspection process as well as the trainings held in 2010. Yet the City fails to provide detailed information on 2010 construction projects and the results of the erosion and sediment control inspections including frequency of inspections, level of compliance with the City's ordinance, and any

enforcement actions. This information would be helpful in ascertaining whether or not the City has implemented an adequate inspection and enforcement program to ensure that erosion and sediment control BMPs are installed as per approved site plans and are adequately maintained, which was identified as a deficiency in the MS4 Compliance Inspection Report.

Illicit Discharge Detection and Elimination

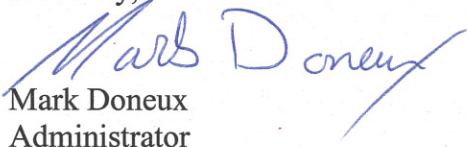
While the City lists three illicit discharge complaints and the follow up actions that took place in 2010, CRWD believes the City fails to mention other significant illicit discharges identified in 2009 or 2010 and the follow up actions, if any, taken by the City to identify and eliminate the sources of the discharges. During EPA's MS4 Compliance Inspection, three prohibited discharges were identified at municipal facilities and one prohibited discharge was identified on a public street. These illicit discharges are not mentioned in the annual report. At a minimum, CRWD recommends the City document the municipal facilities' illicit discharges and the City's follow up actions, if any, to address them.

Also CRWD reported potential illicit discharges at the Saint Anthony Park outfall, which discharges into the Mississippi River, on at least three occasions in 2010. CRWD requests that the City document these reports and the follow up actions, if any, taken by the City.

In the MS4 Compliance Inspection Report, EPA states that "the City did not have established standard operating procedures (SOPs) or written procedures for documenting and tracking illicit discharges and reporting their occurrence in the annual report" and "the City does not have written enforcement procedures for responding to illicit discharges, spills and illegal dumping." CRWD acknowledges that the City has made progress in addressing these concerns with the City's Park and Recreation Department Spill Reporting Form and two City Departments adopting water protection policies of good housekeeping practices to minimize pollution. However, the City still needs to prepare SOPs for documenting and tracking illicit discharges and written enforcement procedures for responding to illicit discharges, spills and illegal dumping and it should be a priority for the City in 2011/2012.

CRWD requests the City address these comments in the final Annual Report or commit to addressing them in 2011/2012. Thank you for consideration of these comments and please contact me if you have any questions.

Sincerely,


Mark Doneux
Administrator

Cc: Scott Fox, MPCA
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