

STORM WATER MANAGEMENT PROGRAM

Southeast Wisconsin Professional Baseball Park District

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Milwaukee, Wisconsin 53214



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STORM WATER MANAGEMENT PROGRAM

Management Certification

I certify that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information contained in the document. Based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information; the information contained in this document is, to the best of my knowledge and belief, true, accurate and complete. In addition, I certify that the Southeast Wisconsin Professional Baseball Park District intends to comply with this document.

Pat Goss

Name

Executive Director

Title



Signature

June 8, 2022

Date

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INTRODUCTION

The Southeast Wisconsin Professional Baseball Park District (SEWPBPD or District) facility located at 1 Brewers Way, Milwaukee has been authorized to discharge storm water under Wisconsin Pollutant Discharge Elimination System (WPDES) Permit No. WI-S049921. The August 2021 permit (WI-S049921-04) includes a requirement for a written storm water management program (SWMP) that describes how the permit requirements for each of the six minimum control measures are to be met. The six minimum control measures are:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Pollutant Control
- Post-Construction Storm Water Management
- Pollution Prevention

This document is intended to describe the implementation of these measures, and other permit requirements, in detail.

IMPAIRED WATERBODIES (Permit Section I.I.)

The permit requires a written section of the SWMP that discusses the management practices and control measures to be implemented as part of the program to reduce the discharge of each pollutant of concern that contributes to the impairment of the receiving waterbody. As stated in the permit, this requirement/section applies to receiving waters listed as impaired on the 303(d) list without established TMDL wasteload allocations. Receiving waters and pollutants with established wasteload allocations are addressed in Section III (Special Conditions) of the permit.

Based on a review of the 303(d) information accessed via the Wisconsin Surface Water Data Viewer, the section of the Menomonee River to which the SEWPBPD discharges (Waterbody ID Code 16000), has been assessed as follows:

- Impaired due to chloride - Assessed during the 2018 and 2022 listing cycles
- Impaired due to fecal coliform – included in the Milwaukee River Watershed TMDL which was approved by the EPA in 2018

Because the fecal coliform is included in an established TMDL, only the chloride is subject to this section of the permit. The only known source of chloride in storm water run-off at the ballpark is from the storage and use of salt and/or deicers during winter months and the BMPs were chosen accordingly. The District will (or has):

- Prioritize physical snow and ice removal over salt application
- Consider shifting from granular products to liquid products
- Apply no more road salt or other deicers than the amount necessary to maintain public safety
- Develop and implement a written salt application or salt reduction strategy to minimize overapplication of deicers
- Ensure that salt application equipment is calibrated annually

- Utilize application methods that reduce bounce and scatter of granular products including reducing speed, reducing spinner speed, targeting the center of the road
- As appropriate, store salt in accordance with the requirements of WAC Trans 277 (which applies to entities that store more than 1,000 pounds of bulk road salt), including:
 - Storing on an impermeable surface
 - Providing a secure cover

The need for salt/deicing is relatively minimal because only the ring roads and a few parking lots/areas must remain usable during the winter months. The majority of parking areas do not receive salt application as they are not in use most of the winter. Therefore, these BMPs are appropriate to select over other more complex and/or expensive practices which may be better suited to an actual municipality responsible for snow and ice removal on all streets throughout their community.

AMENDMENTS (Permit Section II.I.)

The SEWPBPD will amend portions of this Storm Water Management Program as soon as possible if it is determined that the plan/program does not meet a requirement of the permit. Amendments, other than minor updates, will be provided to the WDNR for review and approval prior to implementation of changes.

ANNUAL REPORT (Permit Section II.J.)

The SEWPBPD will submit biennial reports, rather than annual reports described in the permit, as authorized by the WDNR. Reports will be submitted the 2nd and 4th years of the permit (2023 and 2025) and biennial thereafter.

TAB 1

PUBLIC EDUCATION AND OUTREACH (Permit Section II.A.)

AND

PUBLIC INVOLVEMENT AND PARTICIPATION (Permit Section II.B.)

PUBLIC EDUCATION AND OUTREACH

Permit No. WI-S049921-04
Section II. A.

A. PUBLIC EDUCATION AND OUTREACH

The SEWPBPD shall implement written public and staff education and outreach programs to increase the awareness of how the combined actions of human behavior influence storm water pollution and its effects on the environment. The public education and outreach program may incorporate cooperative efforts with other entities not regulated by this permit provided a mechanism is developed and implemented to track the results of these cooperative efforts and reported biennially. For each topic area, the program shall identify the targeted audience, delivery mechanism and the persons responsible for implementation.

1. Promote detection and elimination of illicit discharges and water quality impacts associated with discharges of pollution into its municipal separate storm sewer system.
2. Inform and educate the public to facilitate the proper management of materials that may cause storm water pollution from sources.
3. Promote beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides.
4. Manage materials and behaviors, including toxic materials, landscape care, and waste, in a way that may reduce storm water pollution.
5. Promote the management of stream banks and shorelines to minimize erosion and restore and enhance the ecological value of waterways.
6. Target businesses and activities that may pose a storm water contamination concern, and where appropriate, educate specific audiences such as lawn care companies, tour bus companies, winter and waste management services, and food vendors on methods of storm water pollution prevention.

PUBLIC EDUCATION AND OUTREACH PROGRAM

In order to comply with the new permit requirements, the SEWPBPD is updating its already implemented information and education program to educate and increase awareness of the public and ballpark staff and contractors of how the combined actions of human behavior influence storm water pollution and its effects on the environment as well as help change behaviors to reduce impacts to our important natural resources.

The SEWPBPD will implement the following Public Education and Outreach Program in accordance to the WPDES Permit, Part 2, Section A.

1. Promote detection and elimination of illicit discharges and water quality impacts associated with discharges of pollution into its municipal separate storm sewer system.

Target Audience	Delivery Mechanism	Person Responsible	Mechanism for evaluating effectiveness
Users of the parking lots at American Family Field	Catch basin stenciling	Pat Goss	Track the number of patrons using the parking lots that would have an opportunity to be educated by the stenciling.
<p>Implementation Mechanism Catch basin stenciling has been completed in the past years at the Park and, on an annual basis, basins and inlets are inspected by SEWPBPD for sediment accumulation. The stenciled signage will also be inspected and a report will be generated on which signs need to be reapplied. The SEWPBPD will provide that list to Milwaukee Brewers Baseball Club (MBBC) who will reapply the paint. When properly implemented, the users of the parking lots will be able to clearly see the signage and not dump anything in the catch basins.</p>			

2. Inform and educate the public to facilitate the proper management of materials that may cause storm water pollution from sources.

Target Audience	Delivery Mechanism	Person Responsible	Mechanism for evaluating effectiveness
Ballgame attendees	Scoreboard announcement	Pat Goss	Track the number of patrons in attendance during a ballgame at the ballpark that would have an opportunity to be educated by the scoreboard announcement.
<p>Implementation Mechanism An announcement related to the proper management and disposal of materials at the ballpark (e.g., garbage, recycling, ashes) will appear on the main scoreboard at each home Brewer game.</p>			

3. Promote beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides.

Target Audience	Delivery Mechanism	Person Responsible	Mechanism for evaluating effectiveness
Users of the parking lots and ballpark	Permanent sign	Pat Goss	Track the number of patrons attending events at the ballpark that would have an opportunity to be educated by the sign.
<p>Implementation Mechanism The SEWPBPD will produce a sign that will be installed in a high foot traffic area near Helfaer Field that will educate fans on ways they can manage their lawns and gardens in a more environmentally friendly manner.</p>			

4. Manage materials and behaviors, including toxic materials, landscape care, and waste, in a way that may reduce storm water pollution.

Target Audience	Delivery Mechanism	Person Responsible	Mechanism for evaluating effectiveness
Users of Lot 13	Training on proper storage and disposal of a variety of materials.	Pat Goss	Monitor the quarterly inspection reports for Lot 13 for improvements to material handling and disposal.
<p>Implementation Mechanism The SEWPBPD and MBBC will develop training for a variety of employees and contractors who work at the ballpark and utilize Lot 13. Appropriate employees and contractors will be provided annual training about the proper handling, storage and disposal of various materials, including grease, solid waste and recycling, and yard waste.</p>			

5. Promote the management of stream banks and shorelines to minimize erosion and restore and enhance the ecological value of waterways.

Target Audience	Delivery Mechanism	Person Responsible	Mechanism for evaluating effectiveness
Users of the Hank Aaron State Trail	Sign along trail	Pat Goss	Place sign for maximum exposure to the greatest number of users along the ballpark site.
<p>Implementation Mechanism The SEWPBPD has promoted the management of stream banks and shorelines to minimize erosion and restore and enhance ecological value particularly along the Menomonee River. Prior to the construction of the Park, this reach of the Menomonee River was virtually inaccessible to the public. During construction of the Park grounds, improvements were made to the banks of the Menomonee River including creating a gradual slope and removing a sheet-pile wall. The SEWPBPD has also participated in the construction and continued maintenance of the Hank Aaron State Trail, giving further access to the Menomonee River, and has allowed open and free access to the Menomonee River (free parking is available during nonevents at the ballpark). The MBBC continues to participate in maintenance of the Hank Aaron State Trail.</p> <p>The SEWPBPD will erect a sign along the Hank Aaron Trail adjacent to the Menomonee River that will remind people that their activities in the parking lots can have a direct impact on the water quality of the river.</p>			

6. Target businesses and activities that may pose a storm water contamination concern, and where appropriate, educate specific audiences such as lawn care companies, tour bus companies, winter and waste management services, and food vendors on methods of storm water pollution prevention.

Target Audience	Delivery Mechanism	Person Responsible	Mechanism for evaluating effectiveness
Bus and Recreational Vehicle drivers utilizing the parking lots at the ballpark	Notice handed to each bus or recreational vehicle entering the parking lots	Pat Goss	Track the number of violations reported
<p>Implementation Mechanism As buses and RVs first enter the parking lot, they are provided a flyer which reminds them that if their holding tank leaks or is released on property, DNR is on-site and will issue a citation with fines. The flyer contains the DNR violations number, 800-TIP-WDNR. The flyer also reminds drivers that whatever goes into an inlet goes directly into the river.</p>			

PUBLIC INVOLVEMENT AND PARTICIPATION

Permit No. WI-S049921-04
Section II. B.

B. PUBLIC INVOLVEMENT AND PARTICIPATION

The permittee shall implement a written public involvement and participation program that provides opportunities for the public to effectively participate in the development, implementation, and modification of the permittee’s storm water management program. The approach must include provisions for receiving and considering public comments on the following permit activities: biennial reports, SWMP revisions, and TMDL pollutant load reduction benchmark development. The permittee shall also identify delivery mechanism and target participants associated with each permit activity. Delivery mechanisms may include public workshop, presentation of storm water information, government event (public hearing, council meeting, etc.), citizen committee meeting, or website.

PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

The SEWPBPD Public Involvement and Participation Program will be implemented to address WPDES Permit, Part 2, Section B.

The SEWPBPD is unique in that it is a special unit of government created for a specific purpose and therefore does not have “citizens” in the traditional sense. Instead, SEWPBPD serves the public through its oversight of their investment in the ballpark. Given that we don’t have “citizens” that we are responsible for serving on a day-to-day basis, we tried to think outside of the box in order to get input from stakeholder groups that would share our interests in protecting and enhancing the waterways around the ballpark. The SEWPBPD has and will continue to reach out to the Milwaukee Metropolitan Sewerage District, Menomonee Valley Partners, the City of Milwaukee, the City of West Milwaukee and the Wisconsin Department of Transportation to seek their input in the development and updates to the various aspects of the SEWPBPD’s Storm Water Management Program.

Beyond the input and continued involvement from our stakeholders, the general public will be able to participate by providing input on the development, implementation and modifications to the SEWPBPD’s Storm Water Management Program through a variety of means.

	Development of Storm Water Management Program	Implementation of Storm Water Management Program	Modifications to Storm Water Management Program
Delivery Mechanism	Website, public meetings	Website, Game Day Program announcement	Website, public meetings
Target Participants	Visitors of the District’s website, including residents of the five-county District	Ticket holders receiving announcement, attendees of the ballpark	Visitors of the District’s website, including residents of the five-county District

Beyond the input and continued involvement from our stakeholders, the public will be able to review and comment in the following ways.

	Biennial Reports	Modifications to Storm Water Management Program	TMDL Pollutant Load Reduction Benchmark Development
Mechanism for receiving and considering public comments	Website, email, mail	Website, email, mail	Website, email, mail

The SEWPBPD will also implement the following to further enable the public to participate and comment on the SEWPBPD’s Storm Water Management Program. This program will operate with goals of the Menomonee River Priority Watershed in mind.

- The SEWPBPD website will contain the latest Report and WPDES Permit (WI-S049921-04).
- SEWPBPD Board of Directors and Committee Meetings – These meetings are open to the public, media and other interested parties. The SEWPBPD will review the contents of the Storm Water Management Program, the WPDES Permit, and the Biennial reports at the District Board and Committee meetings throughout the year and that information will be available to the public.
- Scoreboard announcements and various signage throughout the ballpark is present to promote public behaviors to reduce pollutants and properly dispose of materials. Please refer to Public Education and Outreach section for additional information.
- An electronic notification to MBCC season ticket holders will include information on proper disposal of materials at the ballpark.

TAB 2

ILLCIT DISCHARGE DETECTION AND ELIMINATION (Permit Section II.C.)

**SOUTHEAST WISCONSIN PROFESSIONAL BASEBALL PARK DISTRICT (“SEWPBPD”)
WPDES PERMIT No. WI-S049921-04
Illicit Discharge Detection and Elimination
Last Update: July 2022**

ILLCIT DISCHARGE DETECTION AND ELIMINATION

**Permit No. WI-S049921-04
Section II. C.**

C. ILLICIT DISCHARGE DETECTION AND ELIMINATION

The SEWPBPD shall implement a written program to detect, remove, and eliminate illicit connections and discharges to the municipal separate storm sewer system. The program shall include:

- A. Method to prevent illicit discharge
- B. Dry weather field screening
- C. Investigation and elimination procedures
- D. Documentation
- E. Training

The Board of Directors has passed Resolution #2022-03, which, in part, states that the District prohibits illicit discharges and connections to the municipal separate storm sewer system owned or operated by the District and is committed to putting forward the best effort possible to protect the Menomonee River and Wood Creek from illicit discharges and connections to ensure the health of our vital natural resources.

The SEWPBPD will implement the attached Illicit Discharge Detection & Elimination (IDDE) Program Manual along with the following activities in an effort to detect, prevent and eliminate illicit discharges. Non-storm water discharges that are **not** considered illicit discharges include: water line flushing, landscape irrigation, diverted stream flows, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, fire fighting and discharges authorized under a WPDES permit unless identified by the Department as a significant source of pollutants to waters of the state.

- All RV and buses that come on site will receive a notice prohibiting them from discharging their tank on SEWPBPD grounds and that the DNR will issue a fine to the operator if a discharge is observed.
- Signage that says no illegal dumping of anything down the storm drains will be maintained on SEWPBPD grounds.
- The Milwaukee Brewers Baseball Club (MBBC) will train appropriate staff to notify their supervisor or on-site law enforcement if they:
 - See anything being dumped into the storm drain
 - See any unusual flow to or near a storm drain
- Require any new construction to include detailed plans of storm and sanitary line.
- The SEWPBPD and Milwaukee Brewers’ website will contain information regarding illicit discharges and a number to contact if an illicit discharge is identified.
- A Spill Prevention, Control and Countermeasure (SPCC) Plan will be maintained and periodically reviewed. Appropriate staff will be trained on the SPCC.



Program Manual

Illicit Discharge Detection & Elimination (IDDE)

Southeast Wisconsin Professional Baseball Park District (SEWPBPD)

WPDES Permit No. WI-S049921-04 (9/1/2021 – 8/31/2026)

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Appendix D – IDDE Inspection Form

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SECTION 1 – ABBREVIATIONS & DEFINITIONS

IDDE Program Manual Abbreviations:

BMP – Best Management Practices

CWP – Center for Watershed Protection

City – City of Milwaukee

County – Milwaukee County

DNR or Department – Wisconsin Department of Natural Resources

District – Southeast Wisconsin Professional Baseball Park District

EPA – Environmental Protection Agency

FEMA – Federal Emergency Management Agency

GIS – Geographic Information System

GPS – Global Positioning System

IDDE – Illicit Discharge Detection and Elimination

MS4 – Municipal Separate Storm Sewer System

NPDES – National Pollutant Discharge Elimination System

ORW/ERW – Outstanding/Exceptional Resource Water

POTW – Publicly Owned Treatment Works

PPE – Personal Protective Equipment

RQ – Reportable Quantity

SEWPBPD – Southeast Wisconsin Professional Baseball Park District

SWMP – Stormwater Management Program

TMDL – Total Maximum Daily Load

WPDES – Wisconsin Pollutant Discharge Elimination System

WPDES Permit – The SEWPBPD's Permit to Discharge Under the Wisconsin Pollutant Discharge

Elimination System – WPDES Permit No. WI-S049921-04. **Please note – where language is italicized, it is quoted directly from this Permit, unless sourced otherwise.**

IDDE Program Manual Definitions:

Multiple sources for the definitions contained in this document include: The Center for Watershed Protection (CWP) "Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments" (October, 2004); WPDES Permit No. WI-S049921-04; State of Wisconsin, Illicit Discharge Detection and Elimination Guidance, March, 2012 (3800-2012-02); Wisconsin Administrative Code and State Statutes.

Action Levels: Recommended action levels for indicator parameters (including pH, total chlorine, total copper, total phenol, and detergents), unless otherwise authorized by the DNR in writing; utilizing Table 1 of the State of Wisconsin Illicit Discharge Detection and Elimination Guidance.

Biennial Report: Information sent to DNR reporting on status of implementing WPDES Permit requirements and activities taken under the Permit on a biennial basis (i.e., taking place every other year).

Grab Sample: A single sample collected by placing a sample bottle in flowing water.

Hazardous Substance: Any substance or combination of substances including any waste of a solid, semisolid, liquid or gaseous form which may cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating reversible illness or which may pose a substantial present or potential hazard to human health or the environment because of its quantity, concentration or physical, chemical, or infectious characteristics. This term includes, but is not limited to, substances which are toxic, corrosive, flammable, irritants, strong sensitizers, or explosives as determined by the DNR.

Illicit Connection: Any man-made conveyance connecting an illicit discharge to a municipal separate storm sewer system.

Illicit Discharge: Any discharge to a municipal separate storm sewer system that is not composed entirely of stormwater except discharges authorized by a WPDES permit or other discharge not requiring a WPDES permit such as landscape irrigation, individual residential car washing, firefighting, diverted stream flows, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, lawn watering, flows from riparian habitats and wetlands, and similar discharges. However, the occurrence of a discharge listed above may be considered an illicit discharge on a case-by-case basis if the permittee or the DNR identifies it as a significant source of a pollutant to Waters of the State.

Impaired Water: A waterbody impaired in whole or in part and listed by the Department pursuant to 33 USC § 1313(d)(1)(A) and 40 CFR 130.7, for not meeting a water quality standard, including a water quality standard for a specific substance or the waterbody's designated use. These waterbodies are also sometimes referred to as 303(d) waterways.

Major Outfall: A municipal separate storm sewer outfall that meets one of the following criteria:

1. A single pipe with an inside diameter of 36 inches or more, or from an equivalent conveyance (cross sectional area of 1,018 square inches) which is associated with a drainage area of more than 50 acres.
2. A municipal separate storm sewer system that receives stormwater runoff from lands zoned for industrial activity that is associated with a drainage area of more than 2 acres or from other lands

with 2 or more acres of industrial activity, but not land zoned for industrial activity that does not have any industrial activity present.

Municipal Separate Storm Sewer System or MS4: A conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, constructed channels or storm drains, which meets all the following criteria:

1. Owned or operated by a municipality.
2. Designed or used for collecting or conveying stormwater.
3. Which is not a combined sewer conveying both sanitary and stormwater.
4. Which is not part of a publicly owned wastewater treatment works that provides secondary or more stringent treatment.

Outfall: The point at which stormwater is discharged to Waters of the State or leaves one municipality and enters another.

Permittee: A person who has applied for and received WPDES permit coverage for stormwater discharge. For the purposes of the WPDES Permit, permittee is the owner or operator of a municipal separate storm sewer system authorized to discharge stormwater into Waters of the State.

Permitted Area: The areas of land under the jurisdiction of the permittee that drains into a municipal separate storm sewer system, which is regulated under a permit issued pursuant to subch. I of NR 216, Wis. Adm. Code.

Point Source: Means either of the following:

1. A discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft from which pollutants may be discharged either into the Waters of the State or into a publicly owned treatment works except for a conveyance that conveys only stormwater. This term does not include agricultural stormwater discharges and return flows from irrigated agriculture.
2. A discernible, confined, and discrete conveyance of stormwater for which a permit is required under section 283.33 (1), Wisconsin State Statutes. This term does not include agricultural stormwater discharges and return flows from irrigated agriculture.

Pollutant: Any dredged spoil, solid waste, incinerator residue, sewage, garbage, refuse, oil, sewage sludge, munitions, chemical wastes, biological materials, radioactive substance, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal and agricultural waste discharged into water.

Pollutants of Concern: A pollutant that is causing impairment of a waterbody.

Pollution: Man-made or man-induced alteration of the chemical, physical, biological, or radiological integrity of water.

Program Manual: Refers to the Southeast Wisconsin Professional Baseball Park District's Illicit Discharge Detection and Elimination Program Manual.

Urbanized Area: A place and the adjacent densely settled surrounding territory that together have a minimum population of 50,000 people as determined by the U.S. Bureau of Census based on the latest 10-year federal census.

Waters of the State: Those portions of Lake Michigan and Lake Superior within the boundaries of Wisconsin, all lakes, bays, rivers, streams, springs, ponds, wells, impounding reservoirs, marshes, water courses, drainage systems and other surface water or groundwater, natural or artificial, public, or private within the state or under its jurisdiction, except those waters which are entirely confined and retained completely upon the property of a person.

WPDES Permit: A Wisconsin Pollutant Discharge Elimination System permit issued pursuant to Chapter 283, Wisconsin State Statutes.

SECTION 2 – INTRODUCTION

Background:

The Southeast Wisconsin Professional Baseball Park District (hereto referred to as SEWPBPD or District) is the owner and operator of municipal separate storm sewer system (MS4) and is permitted to discharge stormwater from all portions of the MS4 to Waters of the State in accordance to conditions set forth in WPDES Permit No. WI-S049921-04 (see Appendix A for the Permit).

This program manual has been developed by the SEWPBPD to address requirements of the WPDES Permit (Section II. C.1.2.3.4. and 5.) utilizing resources including The Center for Watershed Protection (CWP) manual, *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments*, (October, 2004) and State of Wisconsin Correspondence/Memorandum, “Illicit Discharge Detection and Elimination Guidance”, (March, 2012 3800-2012-01, included in Appendix B) to *detect, remove, and eliminate illicit connections and discharges to the municipal separate storm sewer system*.

The SEWPBPD’s IDDE program manual is managed by the District’s Executive Director. Other District staff, Milwaukee Brewers Baseball Club staff and District consultants will play a role in locating, identifying, and reporting potential illicit discharges. Citizen reporting is also relied upon.

Definition of Illicit Discharge:

The CWP has published a manual titled *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments* (October 2004) (Alabama, October 2004). This document uses a four-part definition for illicit discharges, including the following (page 5):

1. Illicit discharges have a measurable flow during dry weather containing pollutants and/or pathogens. Storm drains having measurable flow but no pollutants are simply considered a discharge.
2. Illicit discharges have a unique frequency, composition, and mode of entry in the storm drainage system.
3. Illicit discharges may be caused when the sewage disposal system interacts with the storm drainage system through illegal cross connections or other sources.
4. Illicit discharges may be produced from specific source areas and operations known as

“generating sites”. An understanding of the interaction between these potential generating sites and the storm drainage system can be helpful in locating and preventing illicit discharges.

Modes of Entry (pages 7-11 of CWP manual):

Each illicit discharge has unique characteristics including modes of entry to a MS4 as identified in the CWP manual. Direct entry is discharge that is directly connected to the storm drainpipe through a sewage pipe, shop drain, or other kind of pipe. Direct entry usually produces discharges that are continuous or intermittent. Direct entry usually occurs when two different kinds of “plumbing” are improperly connected. The three main situations where this occurs are:

1. Sewage cross-connections: A sewer pipe that is improperly connected to the storm drain system produces a continuous discharge of raw sewage to the pipe. Sewage cross-connections can occur in catchments where combined sewers or septic systems are converted to a separate sewer system, and a few pipes get “crossed.”
2. Straight pipe: This term refers to relatively small diameter pipes that intentionally bypass the sanitary connection or septic drain fields, producing a direct discharge into open channels or streams.
3. Industrial and commercial cross-connections: These occur when a drainpipe is improperly connected to the storm drain system producing a discharge of wash water, process water or other inappropriate flows into the storm drainpipe. An example would be a floor shop drain that is illicitly connected to the storm drain system.

Indirect entry means that flows generated outside the storm drain system enter through storm drain inlets or by infiltrating through the joints of the pipe. Generally, indirect modes of entry produce intermittent or transitory discharges, except for groundwater seepage. The five main modes of indirect entry for discharges include:

1. Groundwater seepage into the storm drainpipe: Seepage frequently occurs in storm drains after long periods of above average rainfall. Seepage discharges can be either continuous or intermittent, depending on the depth of the water table and the season. Groundwater seepage usually consists of relatively clean water that is not an illicit discharge by itself but can mask other illicit discharges. If storm drains are located close to sanitary sewers, groundwater seepage may intermingle with diluted sewage.
2. Spills that enter the storm drain system at an inlet: These transitory discharges occur when a spill travels across an impervious surface and enters a storm drain inlet. Spills can occur at many industrial, commercial, and transport-related sites. A very common example is an oil or gas spill from an accident that then travels across the road and into the storm drain system.
3. Dumping a liquid into a storm drain inlet: This type of transitory discharge is created when liquid wastes such as oil, grease, paint, solvents, and various automotive fluids are dumped into the storm drain. An example is dumping used automotive oil into a curbside inlet.
4. Outdoor washing activities that create flow to a storm drain: Outdoor washing may or may not be an illicit discharge, depending on the nature of the generating site that produces the wash water. For example, hosing off individual sidewalks and driveways may not generate significant flows or pollutant loads. On the other hand, routine washing of fueling areas, outdoor storage areas, and parking lots (power washing), and construction equipment cleanouts may result in unacceptable pollutant loads.
5. Non-target irrigation from landscaping or lawns that reaches the storm drain system: Irrigation can produce intermittent discharges from over-watering or misdirected sprinklers that send tap

water over impervious areas. In some instances, non-target irrigation can produce unacceptable loads of nutrients, organic matter, or pesticides. The most common example is a discharge from commercial landscaping areas adjacent to parking lots connected to the storm drain system.

Land use can be used to predict likelihood of illicit discharge source. The CWP manual contains a table with land uses, generating sites and activities which produce discharge (see below). It is important to note, some of the activities listed in this table, such as residential car washing, are not considered illicit discharges by the DNR. It is also important to note that many of the generating sites are not land uses occurring at the ballpark and many of the activities do not occur at the ballpark.

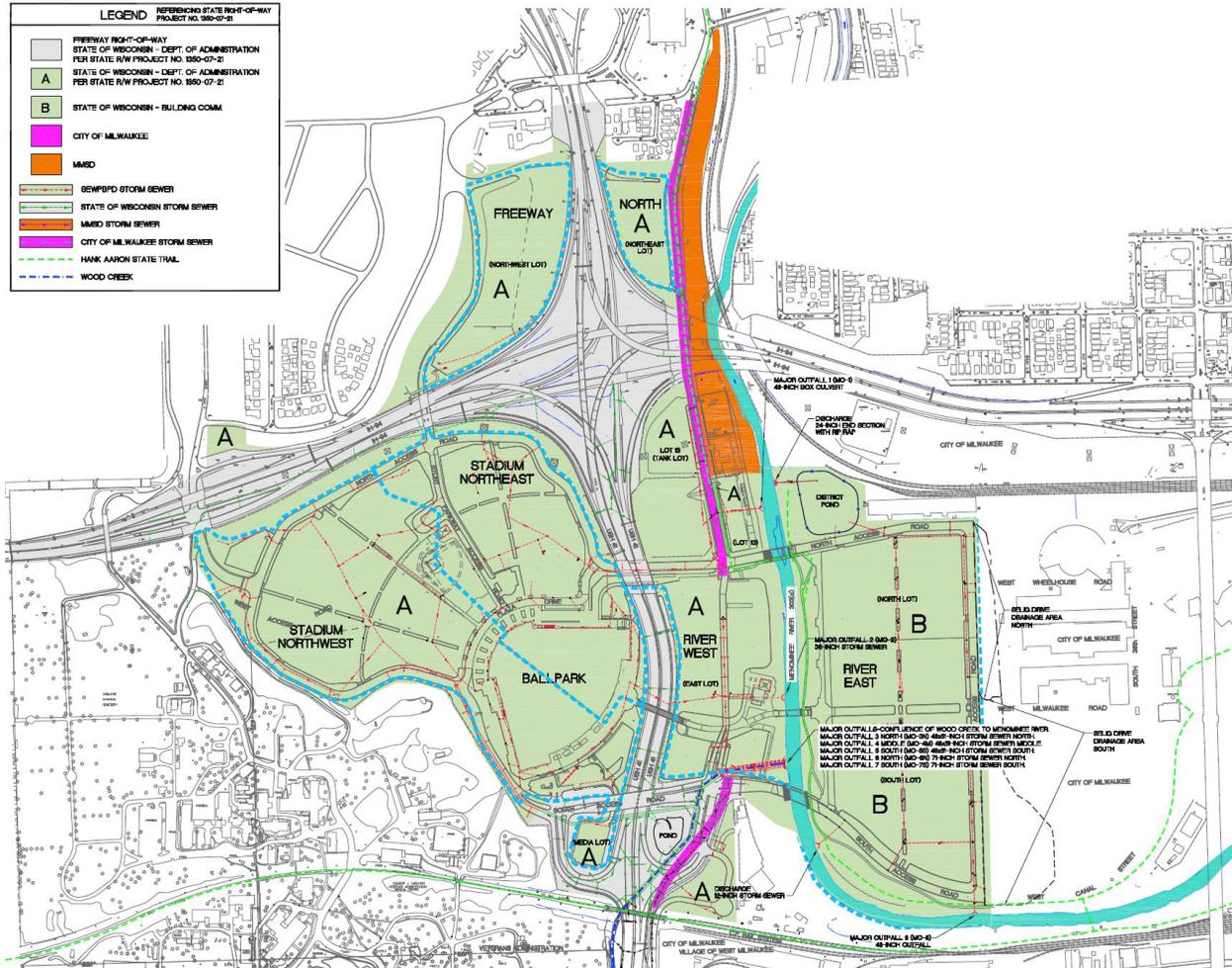
Chapter 1: The Basics of Illicit Discharges

Table 2: Land Uses, Generating Sites and Activities That Produce Indirect Discharges		
Land Use	Generating Site	Activity that Produces Discharge
Residential	<ul style="list-style-type: none"> • Apartments • Multi-family • Single Family Detached 	<ul style="list-style-type: none"> • Car Washing • Driveway Cleaning • Dumping/Spills (e.g., leaf litter and RV/boat holding tank effluent) • Equipment Washdowns • Lawn/Landscape Watering • Septic System Maintenance • Swimming Pool Discharges
Commercial	<ul style="list-style-type: none"> • Campgrounds/RV parks • Car Dealers/Rental Car Companies • Car Washes • Commercial Laundry/Dry Cleaning • Gas Stations/Auto Repair Shops • Marinas • Nurseries and Garden Centers • Oil Change Shops • Restaurants • Swimming Pools 	<ul style="list-style-type: none"> • Building Maintenance (power washing) • Dumping/Spills • Landscaping/Grounds Care (irrigation) • Outdoor Fluid Storage • Parking Lot Maintenance (power washing) • Vehicle Fueling • Vehicle Maintenance/Repair • Vehicle Washing • Washdown of greasy equipment and grease traps
Industrial	<ul style="list-style-type: none"> • Auto recyclers • Beverages and brewing • Construction vehicle washouts • Distribution centers • Food processing • Garbage truck washouts • Marinas, boat building and repair • Metal plating operations • Paper and wood products • Petroleum storage and refining • Printing 	<ul style="list-style-type: none"> • All commercial activities • Industrial process water or rinse water • Loading and un-loading area washdowns • Outdoor material storage (fluids)
Institutional	<ul style="list-style-type: none"> • Cemeteries • Churches • Corporate Campuses • Hospitals • Schools and Universities 	<ul style="list-style-type: none"> • Building Maintenance (e.g., power washing) • Dumping/Spills • Landscaping/Grounds Care (irrigation) • Parking Lot Maintenance (power washing) • Vehicle Washing
Municipal	<ul style="list-style-type: none"> • Airports • Landfills • Maintenance Depots • Municipal Fleet Storage Areas • Ports • Public Works Yards • Streets and Highways 	<ul style="list-style-type: none"> • Building Maintenance (power washing) • Dumping/Spills • Landscaping/Grounds Care (irrigation) • Outdoor Fluid Storage • Parking Lot Maintenance (power washing) • Road Maintenance • Spill Prevention/Response • Vehicle Fueling • Vehicle Maintenance/Repair • Vehicle Washing

SECTION 3 - STORM SEWER SYSTEM MAP

The SEWPBPD storm sewer system map is available for use by the SEWPBPD, Milwaukee Brewers Baseball Club, consultants, and DNR. Maintaining an accurate map of the stormwater drainage system makes it easier to track and locate the source of suspected illicit discharges. The WPDES Permit outlines minimum information that should be included in the SEWPBPD's storm sewer system map.

Figure 1: Image from SEWPBPD Storm Sewer System Map, ↑ North, Not to Scale



303(d) Impaired Waterway:

The Clean Water Act requires the DNR to assess and publish a list of impaired waters. At time of this publication the Menomonee River (WBIC 16000) as it flows through the SEWPBPD's permitted area is a 303(d) Impaired Waterway.

SECTION 4 – ILLICIT DISCHARGE DETECTION & ELIMINATION AUTHORITY

Regulatory Authority:

The SEWPBPD does not have an illicit discharge ordinance nor means to regulate. The SEWPBPD relies on the state regulations and authority to collaborate between the SEWPBPD and DNR to help prevent and eliminate discharges and connections to the MS4.

The District's Board of Directors has passed Resolution #2022-03, which, in part, states that the District prohibits illicit discharges and connections to the municipal separate storm sewer system owned or operated by the District and is committed to putting forward the best effort possible to protect the Menomonee River and Wood Creek from illicit discharges and connections to ensure the health of our vital natural resources.

The WPDES Permit contains specific requirements which reference the DNR's IDDE Guidance Document which has been used by the SEWPBPD in creating an effective program to determine the presence of illicit discharges from the MS4 outfalls. This program manual includes:

1. Outfall visual and field screening procedures.
2. Procedures for responding to known or suspected illicit discharges and/or spills.
3. Procedures to remove illicit discharges from the MS4.
4. Procedures to notify DNR via the DNR 24-hour toll free spill hotline at 1-800-943-0004.
5. Procedures to notify impacted municipalities within one working day in the case of an illicit discharge that originates from the SEWPBPD's permitted area that discharges to a MS4 or property under the jurisdiction of another municipality.
6. Procedure for documentation/record keeping.

The overall intent of this program manual is to provide sufficient details and technical background regarding illicit discharge, locate and describe SEWPBPD owned/operated outfalls, provide procedures for visual and field screening of outfalls; and outline the procedure to respond to known or suspected illicit discharges and/or spills.

The SEWPBPD District's Executive Director is responsible for developing, maintaining, and updating this program manual and ensuring that other District staff, consultants and Milwaukee Brewers Baseball Club staff are familiar with this program manual. The Executive Director is also responsible for oversight of:

- Record maintenance
- Completion of inspections
- Staff training
- Public interactions for responding to illicit discharge events that originate from the SEWPBPD's permitted area

The primary point of contact: Pat Goss, District Executive Director

SECTION 5 – OUTFALL DETAILS

The SEWPBPD major outfalls are identified on the Storm Sewer System Map. All outfalls discharge to the Menomonee River. Outfalls MO-3N, MO-4M, MO-5S, MO-6N, and MO-7S contain flow from Wood Creek, which is piped. Details including unique naming and outfall size along with photos of each outfall is provided below:

Major Outfall 1 (MO-1) 48-Inch Box Culvert:



Major Outfall 3 North (MO-3N) 48 x 51-Inch Storm Sewer:



Major Outfall 2 (MO-2) 36-Inch Storm Sewer:



Major Outfall 4 Middle (MO-4M) 48 x 51-Inch Storm Sewer:



Major Outfall 5 South (MO-5S) 48 x 51-Inch Storm Sewer:



Major Outfall 7 South (MO-7S) 71-Inch Storm Sewer:



Major Outfall 6 North (MO-6N) 71-Inch Storm Sewer:



Major Outfall 8 (MO-8) 48-Inch Outfall:



SECTION 6 - INSPECTION PROCEDURES

Per the SEWPBPD's WPDES Permit, Section II, C.2., dry weather field screening shall occur *during dry weather periods (72 hours after measurable rainfall) at all MS4 outfalls, at a minimum of once per year. The dry weather field screening shall occur during an event or as an approved written alternative by the Department. If no events are held in a calendar year, outfall screening is still required.*

Inspection must take place *during dry weather periods to minimize potential interference from non-illicit sources including runoff and groundwater.... Field screening during periods of high groundwater, such as the early spring, should be avoided. However, spring or fall screening may be necessary if outfall access is significantly obstructed by vegetation* (Source: State of Wisconsin Correspondence/Memorandum, "Illicit Discharge Detection and Elimination Guidance", (March, 2012 3800-2012-01), page 3, Timing).

Inspection will be conditioned upon weather and, due to security protocols, certain areas of the site are not accessible during events.

NR 216, Wisconsin Administrative Code provides further details:

NR 216.07(3)(i): A field screening analysis for illicit connections and illicit discharges at all major outfalls, plus any additional selected field-screening points designated by the municipality or the department. At a minimum, a screening analysis shall include a narrative description of visual observations made during dry weather periods. If any flow is observed, field analysis shall be conducted to determine the presence of illicit discharges. All field analysis shall include a narrative description of the color, odor, turbidity, the presence of an oil sheen or surface scum, and a description of the flow rate as well as any other relevant observations regarding the potential presence of non-storm water discharges. In addition, the field analysis shall include sampling for pH, total chlorine, total copper, total phenol and detergents unless the permittee obtains concurrence from the department to perform alternative sampling that is more effective to detect illicit discharges such as with ammonia, potassium or bacteria. The field screening points shall be established using the following: 1. Field screening points shall, where possible, be located downstream of any sources of suspected illegal or illicit activity. 2. Field screening points shall be located where practicable at the farthest manhole or other accessible location downstream in the system. Safety of personnel and accessibility of the location shall be considered in making this determination. 3. Consideration shall be given to hydrological conditions, total drainage area of the site, population density of the site, traffic density, age of the structures or buildings in the area, history of the area and land use types.

Prior to beginning outfall inspection, field staff should review the SEWPBPD's storm sewer system map and prior inspection(s) to form a baseline of anticipated site conditions. Field staff shall dress appropriately for field conditions, wearing proper PPE and anticipating steep slopes, brush, potential harmful vegetation (such as thorn bushes and/or poison ivy), and possible water access. Recommended IDDE screening equipment is included in Appendix C. While on the site, an outfall location may not be safe to access due to a variety of factors, so field staff should make judgement calls for access during inspection.

Initial field screening points are typically located at the end of the outfall pipes listed on the storm sewer system map and photos above. When accessible, screening may also occur at manholes/inlets/catch

basins of the contributing storm sewer system, ideally within the furthest “downstream” structure of the system. Safety must be considered in making this determination. Further details related to safety are provided below. Because the Wood Creek/Menomonee River outfalls may be impacted by flows of either waterway, it is also important to evaluate for flow within the River West Lot SEWPBPD storm sewer system inlets.

Field screening shall be documented on the inspection form and include:

1. Date, time, weather conditions, and name(s) of inspector completing screening.
2. *Visual Observation: A narrative description of visual observations including color, odor, turbidity, oil sheen or surface scum, flow rate and any other relevant observations regarding the potential presence of non-storm water discharges or illegal dumping shall be completed for each outfall visited.*

If suspect illicit discharge is observed from SEWPBPD’s owned and operated MS4, field analysis shall be conducted. If the discharge is found to be originating within the District’s site, field samples will be taken and delivered to an outsourced lab within 24-hours to determine the cause of dry weather flow. *The field analysis shall include sampling for pH, total chlorine, total copper, total phenol, and detergents, unless the permittee elects to use alternative indicator parameters such as ammonia, potassium, or fluoride (as authorized in writing by the DNR).* The lab will provide quantitative data which can then be compared to Indicator Parameters – Action Levels per DNR IDDE Guidance (see Table 2 below) in a timely manner.

During the field inspection, field staff will typically make one of the three following initial observations:

1. No flow is coming from the outfall (however it may be dry or damp) → Staff shall record observations on the inspection form (see Appendix D) and photograph the outfall.
 - a. In the case of the Wood Creek outfalls, inspection staff shall verify the same within contributing SEWPBPD storm sewer inlets within the River West Lot.
2. A suspect, illicit discharge of flow is observed coming from the outfall (or illicit flow noted in inlet in River West Lot) → Staff shall contact the District’s Associate Director to brief them on relevant details so that the District can notify the Executive Director, begin to follow response procedures (see Section 7 below), fill out the inspection checklist, photograph the outfall and flow, attempt to track the source, and, if flow is found to be originating from the District’s site, take a grab sample for outsourced laboratory analysis. Grab sampling instruction is listed below.
3. The outfall is submerged with no observed flow → Staff shall fill out the inspection report, photograph the outfall and attempt to locate a sampling point upstream of the outfall such as within a manhole, inlet or catch basin.

Submerged & Enclosed Outfalls

It may be difficult or impossible to conduct outfall field screening activities at outfalls that are fully or partially submerged by receiving waters or located within enclosed waterways. For these cases field screening activities should be conducted at appropriate upstream manholes. On-site illicit connection inspections should be considered for any high-risk facilities that can potentially discharge to the MS4 between the outfall and field screening manholes. Another option to consider is televising the storm

sewer segments located between field screening manholes and the outfall. Source: IDDE Guidance (Appendix B), page 7.

Inspection staff shall always consider safety first and shall not enter confined spaces, such as pipes or manholes unless properly trained, certified, and equipped for confined space entry; and given direct permission by the SEWPBPD. In addition, safety shall be considered for removal of manhole lids and catch basin covers and be prior authorized by the SEWPBPD. Additional safety hazards that shall be addressed include traffic hazards, injuries to the body, and potentially hazardous conditions within structures. Inspection staff shall park within parking lots as given permission by the SEWPBPD; parking within access roads, DOT right-of-way, or municipal right-of-way is prohibited unless permission is granted in writing by the municipality or DOT.

Methods for collecting grab samples:

1. Follow lab instructions for safe handling of sample bottles and any preservatives contained within (for instance, this may require use of PPE including safety glasses).
2. If sample bottles come prepared with preservatives, ensure these chemicals are not spilled or handled (typically these chemicals are acids).
3. Write sample details on label provided with sample bottles/jars (outfall number, name, date, time, etc.) with a permanent marker.
4. Avoid cross-contamination. Put on nitrile/latex gloves before removing lid. Keep inside of lid clean - do not place lid cover face down on the ground, in a pocket, etc.
5. Do not access flow location by foot or otherwise stir up any existing substrate/sediment.
6. Place mouth of sample bottle facing flow making sure to keep hands and fingers on the outside of the bottle.
7. Collect flow from as close to the middle of the flow profile (depth) as possible.
8. Fill bottle(s) to level instructed by lab.
9. Place the lid back on the sample bottle and tighten to seal.
10. Dry exterior of bottle and affix label. Place samples in a resealable plastic bag before placing in a cooler.
11. Place the bag(s) in the cooler and prepare the cooler according to the lab instructions (typically on ice for proper preservation) for drop off or pick-up by the lab.
12. Often for analysis hold time can be 24-hours or less (if a suspect sanitary sewage discharge is suspected originating from the ballpark, which is illicit in nature (see footnote 1), the *E. coli* sample hold time is only 8 hours). Coordinate with the lab(s) upon sampling for pick-up or drop-off.

The lab will provide quantitative results of samples collected; this will need to be compared to the DNR's recommended action levels¹ listed in Table 1 below in a timely manner:

¹ In the event a discharge of sanitary sewage is suspected originating from the ballpark, illicit in nature (i.e. sanitary sewage and not the result of wildlife nor pets) a sample shall be collected for analysis using criteria developed for *E. coli* by the DNR/EPA of 410 counts/100 mL (or 410 CFU/100 mL) per NR 102, Wisconsin Administrative Code. Program Manual - Illicit Discharge Detection & Elimination (IDDE)

Table 1: Indicator Parameters – Action Levels – Source: Illicit Discharge Detection and Elimination Guidance, page 5 (see Appendix B for full document). See footnote 1 (above) for *E.coli*.

Parameter	Action Level	Illicit Sources	Non-Illicit Sources
Ammonia	0.1 mg/l	Sanitary sewage and industrial wastewater	Pets, wildlife and potentially WPDES permitted discharges
Detergents	0.5 mg/l	Industrial cleansers, commercial wash water and sanitary sewage	Residential car washing
pH	Less than 6 or greater than 9	Industrial wastewater and concrete truck wash-out	Groundwater and WPDES permitted discharges
Total Chlorine	Detection or positive test unless associated with a WPDES permitted discharge at background water supply levels	Industrial wastewater, swimming pools and sanitary sewage	WPDES permitted discharges
Total Copper	0.1 mg/l	Copper-based product use and manufacturing	WPDES permitted discharges
Phenol	Detection or positive test	Chemical, textile, paint, resin, tire, plastic, electronics and pharmaceutical manufacturing	None
Fluoride	Detection above background groundwater or water supply levels	Commercial and industrial wastewaters with a water supply component	Groundwater and WPDES permitted discharges
Potassium	10 mg/l	Sanitary sewage and industrial wastewater	Groundwater and WPDES permitted discharges
E. coli	10,000 MPN/100 mL	Sanitary sewage	Wildlife and pets
Human Bacteriodes	Detection or positive test	Sanitary sewage	None

SECTION 7 – RESPONSE PROCEDURES TO SUSPECT SPILL/ILLICIT DISCHARGE

In theory, an outfall screened in dry-weather conditions will likely test positive for a pollutant discharge. When there is a suspected spill or illicit discharge detected, the District’s Associate Director will be contacted, and field staff will first attempt to track the source. Upon confirmation that the flow is originating from the District’s site, completion of sampling will occur.

This section outlines the basic tools and methods that can be used to trace the source of a suspected illicit discharge. Source tracing begins when a suspected problem area is identified through the inspection, field assessment/testing, or a complaint call. When the source of the non-stormwater discharge is unknown, the following methods can be used to help locate/track the source of an illicit discharge:

1. Utilize the SEWPBPD’s Storm Sewer System Map to evaluate the MS4 network (such as upstream/adjoining storm sewer system pipe, manhole, culvert crossing, upstream ditches, etc.).
2. Observe upstream points until the source of the spill or discharge can be identified (again – note “safety first” direction).

If the point of spill or discharge is identified and determined to be originating from the District’s site – collect a sample for lab analysis following the grab sampling protocol.

Suspect Spill/Illicit Discharge Response Actions:

- The SEWPBPD shall *prevent and contain spills that may discharge into or are already within the MS4*, which have originated from the District’s MS4. This may require retaining an environmental contractor to assist in spill containment and clean-up.
- The SEWPBPD shall notify the DNR *immediately in accordance with ch. NR 706, Wis. Adm. Code, in the event that the SEWPBPD identifies a spill or release of a hazardous substance, which has resulted or may result in the discharge of pollutants into waters of the state. The Department shall be notified via the 24-hour toll free spill hotline at 1- 800-943-0003. The SEWPBPD shall cooperate with the Department in efforts to investigate and prevent such discharges from polluting waters of the state.*
- Per NR 216.07(3)(h) the SEWPBPD shall eliminate *any leakage or discharge from sanitary conveyance systems into the MS4* via appropriate measures.
- The District’s Associate Director shall contact downstream and upstream municipalities which may be impacted to inform them of discharge/spill within 1 working day.
- The District’s Associate Director shall contact contributing municipality in the event the source of a known illicit discharge/spill is tracked and found to originate from another municipality within 1 working day.

Per documentation provided by the DNR the following individuals will be contacted:

Adjacent MS4	Contact	Phone	Email
City of Milwaukee	1. Kurt Sprangers 2. Nader Jaber	414-286-0515 414-286-0514	kspran@milwaukee.gov njaber@milwaukee.gov
Village of West Milwaukee	James Stenzel <i>After Hours</i>	414-645-6238 414-645-2151	James.stenzel@westmilwaukee.org
WI DOT	Hans Hallanger	608-266-0279	Hans.hallanger@dot.wi.gov

Additional Emergency Contacts are listed at the end of this program manual in Appendix G.

Sanitary Cross-Connections:

The SEWPBPD is served by sanitary sewer. Any cross-connection/leakage originating from the SEWPBPD’s sanitary conveyance system to the MS4 shall be eliminated by the SEWPBPD. Repairs to eliminate these cross-connections shall be recorded by the SEWPBPD. Per NR 706, Wisconsin Administrative Code, any reportable spill/release of hazardous substance shall be reported via the 24-hour DNR spill hotline (1-800-943-0003); with cooperation with DNR occurring to investigate, eliminate and prevent any ongoing/future discharges due to sanitary cross-connection.

Public Illicit Discharge Reporting:

The public has the means to report a suspected illicit discharge/spill by contacting the SEWPBPD. Upon receiving a report, the District's Associate Director and/or consultant will:

- Review the storm sewer system map to understand the MS4 network and assess for past events in the area.
- Complete a field site visit of the reported location with IDDE screening equipment needed for inspection and sampling.
- Inspect surrounding MS4 (storm sewer, inlets, catch basins, culvert crossing, ditches) upstream and downstream of the reported location for evidence of suspect illicit discharge.
- If a suspect illicit discharge is found originating from the SEWPBPD's MS4, sample(s) shall be taken, source of discharge to be tracked, and proper spill abatement materials shall be used to isolate the discharge to help prevent it from further contaminating the MS4.
- Complete DNR spills reporting, elimination activities, and record keeping procedures as identified above.

All spill/illicit discharge events should be properly documented.**Dye Testing Notification:**

The SEWPBPD shall notify the DNR WPDES coordinator and any impacted/downstream municipalities within 24-hours of completing dye testing. This will help eliminate site visits for inspection, particularly due to public reporting.

SECTION 8 – RECORD KEEPING & STAFF TRAINING

The SEWPBPD shall maintain reports of inspections (whether of an illicit/spill event or not). This will help provide a baseline of conditions for future inspections that inspection staff should review and rely upon before an inspection and while investigating potential suspect events. The standard inspection form is included in Appendix D.

It is necessary that staff tasked with implementing this manual are properly trained in understanding the conditions of the WPDES Permit, the SEWPBPD Storm Sewer System Map and are familiar with this program manual and its attachments. Training and refresher training shall take place annually at the start of each baseball season; documentation of training will be maintained in a log attached with this manual (see Appendix F).

This IDDE program manual is intended to be a work in progress, with recommendations for improvement welcomed. In the event significant changes are required, they will be presented during the Biennial Report submittal to the DNR; unless circumstances would require a more immediate modification.

Appendix A – State of Wisconsin Department of Natural Resources Permit to Discharge Under the Wisconsin Pollutant Discharge Elimination System

WPDES Permit No. WI-S049921-04



**STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES**

**PERMIT TO DISCHARGE UNDER THE WISCONSIN
POLLUTANT DISCHARGE ELIMINATION SYSTEM
WPDES PERMIT NO. WI-S049921-04**

In compliance with the provisions of Ch. 283 Wis. Stats., and Chs. NR 151 and 216, Wis. Adm. Code, the **SOUTHEAST WISCONSIN PROFESSIONAL BASEBALL PARK DISTRICT:**

is permitted to discharge storm water from all portions of the

MUNICIPAL SEPARATE STORM SEWER SYSTEM

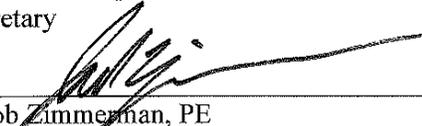
owned or operated by the Southeast Wisconsin Professional Baseball Park District to the following waters of the state:

Menomonee River
Wood Creek

in accordance with the conditions set forth in this permit.

This permit will become effective on the date of signature. This permit to discharge expires at midnight, August 31, 2026. The Department is required to charge an annual fee to owners and operators authorized to discharge under this permit in accordance with s. 283.33(9), Wis. Stats., and s. NR 216.08, Wis. Adm. Code.

State of Wisconsin Department of Natural Resources
For the Secretary

By 
Jacob Zimmerman, PE
Water Resources Engineer

8/24/2021
Date Permit Signed

EFFECTIVE DATE: **September 1, 2021**

EXPIRATION DATE: **August 31, 2026**

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I. APPLICABILITY

A. PERMITTED AREA

This permit covers all areas within the jurisdiction of the Southeast Wisconsin Professional Baseball Park District (SEWPBPD) that contribute to discharges from the municipal separate storm sewer system owned or operated by the SEWPBPD. Municipal separate storm sewer system means a conveyance or system of conveyances designed or used for the collection or conveyance of storm water. These include, but are not limited to: storm sewers, roads with drainage systems, municipal streets, catch basins, inlets, curbs, gutters, ditches, constructed channels or storm drains.

B. AUTHORIZED DISCHARGES

This permit authorizes storm water point source discharges to waters of the state from the municipal separate storm sewer system in the permitted area. This permit also authorizes the discharge of storm water commingled with flows contributed by process wastewater, non-process wastewater, and storm water associated with industrial activity, provided the discharges are regulated by other WPDES permits or discharges which are not considered illicit discharges pursuant to Section II.C.1 of this permit.

C. INDIVIDUAL RESPONSIBILITY

SEWPBPD is responsible for:

1. Effectively prohibiting non-storm water discharges into the MS4 unless otherwise authorized by Section I. B.
2. Reducing pollutants to the maximum extent practicable (MEP). Compliance with this permit, completion of individual benchmarks, and implementation of the storm water management program establishes this MEP requirement.
3. Completing the Total Maximum Daily Load (TMDL) requirements in Section III. A.

D. WATER QUALITY STANDARDS

1. This permit specifies the conditions under which storm water may be discharged to waters of the state for the purpose of achieving water quality standards contained in chs. NR 102 through 105, NR 140, and NR 207, Wis. Adm. Code. During the permit term, compliance with water quality standards will be addressed by adherence to the requirements of this permit, implementation of storm water management programs and practices, and modifications to practices when practices are determined not effective to achieve the aforementioned goals and standards.
2. This permit does not authorize water discharges that the Department, prior to authorization of coverage under this permit, determines will cause or have reasonable potential to cause or contribute to an excursion above any applicable water quality standards. Where such determinations have been made prior to authorization, the Department may authorize coverage under this permit where the storm water management programs required under this permit will include appropriate controls and implementation procedures designed to bring the storm water discharge into compliance with water quality standards.

E. GENERAL STORM WATER DISCHARGE LIMITATIONS

In accordance with s. NR 102.04, Wis. Adm. Code, the Permittee shall control storm water discharges so that all surface waters including the mixing zone meet the following conditions at all times and under all flow and water level conditions:

1. Substances that will cause objectionable deposits on the shore or in the bed of a body of water, shall not be present in such amounts as to interfere with public rights in waters of the state.
2. Floating or submerged debris, oil, scum or other material shall not be present in such amounts as to interfere with public rights in waters of the state.
3. Materials producing color, odor, taste or unsightliness shall not be present in such amounts as to interfere with public rights in waters of the state.
4. Substances in concentrations or combinations which are toxic or harmful to humans shall not be present in amounts found to be of public health significance, nor shall substances be present in amounts which are acutely harmful to animal, plant or aquatic life.

F. WETLANDS

SEWPBPD's MS4 discharge shall comply with the applicable wetland water quality standards provisions in ch. NR 103, Wis. Adm. Code.

G. ENDANGERED AND THREATENED SPECIES

SEWPBPD's MS4 discharge shall comply with the endangered and threatened resource protection requirements of s. 29.604, Wis. Stats., and ch. NR 27, Wis. Adm. Code.

H. HISTORIC PROPERTY

SEWPBPD's MS4 discharge may not affect any historic property that is listed property, or on the inventory or on the list of locally designated historic places under s. 44.45, Wis. Stats., unless the Department determines that the MS4 discharge will not have an adverse effect on any historic property pursuant to s. 44.40(3), Wis. Stats.

I. IMPAIRED WATERBODIES

The requirements of this section apply to receiving waters listed as impaired on the 303(d) list without established TMDL wasteload allocations to which the permittee discharges. The permittee shall:

1. Review the applicable pollutants of concern on the 2020 303(d) list, or the most recent United States Environmental Protection Agency (EPA) approved list that are relevant to the permittee's MS4 discharge and determine whether any part of its MS4 discharges to a listed impaired waterbody. Review shall occur within 12 months each time the 303(d) list is revised.
2. Include a written section in their storm water management program that discusses the management practices and control measures it will implement as part of its program to

reduce, with the goal of eliminating, the discharge of each pollutant of concern that contributes to the impairment of the waterbody. This section of the permittee's program shall specifically identify control measures and practices that will collectively be used to eliminate the MS4's discharge of pollutant(s) of concern that contribute to the impairment of the waterbody and explain why these control measures and practices were chosen as opposed to other alternatives. Pollutant(s) of concern means a pollutant that is causing impairment of a waterbody.

Note: The Department maintains a searchable database of impaired waterways. This publicly accessible database is available at <http://dnr.wi.gov/water/impairedSearch.aspx>.

3. After a permittee's start date of coverage under this permit, the permittee may not establish a new MS4 discharge of a pollutant of concern to an impaired waterbody or increase the discharge of a pollutant of concern to an impaired waterbody unless the new or increased discharge causes the receiving water to meet applicable water quality standards, or the new discharge is consistent with an EPA approved TMDL.

J. EXCLUSIONS

The following are excluded from coverage under this permit:

1. Combined Sewer and Sanitary Sewer Systems:
Discharges of water from a wastewater treatment facility, sanitary sewer or a combined sewer system conveying both sanitary and storm water. These discharges are regulated under s. 283.31, Wis. Stats, and require a separate individual permit.
2. Agricultural Facilities and Practices:
Discharges from "agricultural facilities" and "agricultural practices". "Agricultural facility" means a structure associated with an agricultural practice. "Agricultural practice" means beekeeping; commercial feedlots; dairying; egg production; floriculture; fish or fur farming; grazing; livestock raising; orchards; poultry raising; raising of grain, grass, mint and seed crops; raising of fruits, nuts and berries; sod farming; placing land in federal programs in return for payments in kind; owning land, at least 35 acres of which is enrolled in the conservation reserve program under 16 USC 3831 to 3836; and vegetable raising.
3. Other Excluded Discharges:
Storm water discharges from industrial operations or land disturbing construction activities that require separate coverage under a WPDES permit pursuant to subchs. II or III of ch. NR 216, Wis. Adm. Code. For example, while storm water from industrial or construction activity may discharge from SEWPBPD's MS4, this permit does not satisfy the need to obtain any other permits for those discharges. This exclusion does not apply to each permittee's responsibility to regulate construction sites within its jurisdiction in accordance with Sections II. D. and E of this permit.
4. Indian Country:

Storm water discharges within Indian Country. The federal Clean Water Act requires that owners and operators of storm water discharges within Indian Country to obtain permit coverage directly from the United States Environmental Protection Agency.

II. STORM WATER MANAGEMENT PROGRAM

The permittee shall have a written storm water management program (SWMP) that describes in detail how the permittee intends to comply with the permit requirements for each minimum control measure. Unless otherwise specified, the permittee shall submit written program documents no later than August 1, 2022 and shall begin implementing any updates to its storm water management programs no later than August 1, 2022.

A. PUBLIC EDUCATION AND OUTREACH

The SEWPBPD shall implement written public and staff education and outreach programs to increase the awareness of how the combined actions of human behavior influence storm water pollution and its effects on the environment. The public education and outreach program may incorporate cooperative efforts with other entities not regulated by this permit provided a mechanism is developed and implemented to track the results of these cooperative efforts and reported annually. For each topic area, the program shall identify the targeted audience, delivery mechanism and the persons responsible for implementation.

1. Promote detection and elimination of illicit discharges and water quality impacts associated with discharges of pollution into its municipal separate storm sewer system.
2. Inform and educate the public to facilitate the proper management of materials that may cause storm water pollution from sources.
3. Promote beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides.
4. Manage materials and behaviors, including toxic materials, landscape care, and waste, in a way that may reduce storm water pollution.
5. Promote the management of stream banks and shorelines to minimize erosion and restore and enhance the ecological value of waterways.
6. Target businesses and activities that may pose a storm water contamination concern, and where appropriate, educate specific audiences such as lawn care companies, tour bus companies, winter and waste management services, and food vendors on methods of storm water pollution prevention.

B. PUBLIC INVOLVEMENT AND PARTICIPATION

The permittee shall implement a written public involvement and participation program that provides opportunities for the public to effectively participate in the development, implementation, and modification of the permittee's storm water management program. The approach must include provisions for receiving and considering public comments on the following permit activities: annual reports, SWMP revisions, and TMDL pollutant load reduction benchmark development. The permittee shall also identify delivery mechanism and target participants associated with each permit activity. Delivery mechanisms may include public workshop, presentation of storm water information, government event (public hearing, council meeting, etc.), citizen committee meeting, or website.

C. ILLICIT DISCHARGE DETECTION AND ELIMINATION

The SEWPBPD shall implement a written program to detect, remove, and eliminate illicit connections and discharges to the municipal separate storm sewer system. The program shall include:

1. **Method to Prevent Illicit Discharge:** An ordinance, order, or similar means to prevent and eliminate illicit discharges and connections to the municipal separate storm sewer system. Non-storm water discharges that are **not** considered illicit discharges include: water line flushing, landscape irrigation, diverted stream flows, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, fire fighting and discharges authorized under a WPDES permit unless identified by the Department as a significant source of pollutants to waters of the state.
2. **Dry weather field screening:** A written IDDE field screening procedure. At a minimum, the procedure must include:
 - a) Contact information such as name, title, and phone number of the individual(s) responsible for field screening activities.
 - b) Field screening during dry weather periods (72 hours after measurable rainfall) at all MS4 outfalls, at a minimum of once per year. The dry weather field screening shall occur during an event (e.g., Milwaukee Brewer's baseball game) or as an approved written alternative by the Department. If no events are held in a calendar year, outfall screening is still required.
 - c) Field Screening Points:
 - (1)Field screening points shall, where possible, be located downstream of any source of suspected illicit activity.
 - (2)Field screening points shall be located where practicable at the farthest manhole or other accessible location downstream in the system. Safety of personnel and accessibility of the location shall be considered in making this determination.
 - (3)Field screening points for the 3-48"x51" and 2-76"(Wood Creek) major outfalls to the Menomonee River from the River West parking lot and South Access Road shall be located at the closest upstream manhole in the contributing storm sewer system to be outside the influence of Wood Creek baseflow and backwater effect of the Menomonee River.
 - d) Visual Observation:

A narrative description of visual observations including color, odor, turbidity, oil sheen or surface scum, flow rate and any other relevant observations regarding the potential presence of non-storm water discharges or illegal dumping shall be completed for each outfall visited.

e) Field Analysis:

If flow is observed, field analysis shall be conducted to determine the cause of dry weather flow. The field analysis shall include sampling for pH, total chlorine, total copper, total phenol, and detergents, unless the permittee elects to use alternative indicator parameters such as ammonia, potassium, or fluoride. Other alternative parameters may be authorized by the Department in written concurrence is obtained from the Department allowing use of alternative indicator parameters to more effectively detect illicit discharges such as with potassium or bacteria. Where appropriate, pollutant parameter action levels identified by the permittee must be considered. Field analysis procedures shall describe when other investigative methods such as dye testing or televising will be used.

(1)The Permittee may propose alternative field analysis procedures for review and approval. The permittee shall follow the field analysis procedures identified in subsection e) unless alternative procedures are approved in writing by the Department.

f) Pollutant Parameter Action Levels:

The action levels will identify concentrations for identified pollutants that, if exceeded, will require further investigation, which may include laboratory analysis, to identify the source of the illicit discharge.

Note: The Department has written a guidance document to assist municipalities with development of field screening programs to determine the presence of illicit discharges from MS4 outfalls. The guidance can be found on the Departments website at: <https://dnr.wisconsin.gov/topic/Stormwater/publications.html>

3. **Investigation and Elimination Procedures.** The permittee shall have written procedures for investigating and responding to known or suspected illicit discharges. Procedures must be developed for all of the following, and shall include:

- a) Contact information such as name, title, and phone number of the individual(s) responsible for responding to reports of illicit discharges and spills.
- b) Immediately investigate portions of the municipal separate storm sewer system that, based on the results of visual observation, field screening, laboratory analysis, or relevant other information, such as a complaint or referral, indicate a reasonable potential for containing illicit discharges.
- c) Responding to spills that discharge into and/or from the MS4 including tracking the source of the spill if unknown.
- d) Prevent and contain spills that may discharge into or are already within the municipal separate storm sewer system.
- e) Immediately notify the Department in accordance with ch. NR 706, Wis. Adm. Code, in the event that the SEWPBPD identifies a spill or release of a hazardous substance,

which has resulted or may result in the discharge of pollutants into waters of the state. The Department shall be notified via the 24-hour toll free spill hotline at 1-800-943-0003. The SEWPBPD shall cooperate with the Department in efforts to investigate and prevent such discharges from polluting waters of the state.

- f) Elimination of any leakage or discharge from sanitary conveyance systems into the MS4 as required in s. NR 216.07 (3) (h), Wis. Adm. Code.
 - g) Providing the Department with advance notice of the time and location of dye testing within a MS4.
 - h) In the case of an illicit discharge that originates from the SEWPBPD's permitted area and that discharges directly to a municipal separate storm sewer or property under the jurisdiction of another municipality, the permittee shall notify the affected municipality within one working day.
 - i) In the case of an illicit discharge that is identified within the SEWPBPD's permitted area, but is determined to originate from a contributing storm sewer system or property under the jurisdiction of another municipality, SEWPBPD shall notify the contributing municipality or municipality with jurisdiction immediately, but no longer than one working day.
4. **Documentation:** The permittee shall maintain a system for documenting complaints, referrals, and any actions taken to investigate or eliminate an illicit discharge. A summary of illicit discharge activities for each year shall be included in the annual report.
 5. **Training:** The permittee shall provide education for appropriate personnel involved in IDDE identification and reporting at the start of each season. Documentation shall be maintained in a staff training log.

D. CONSTRUCTION SITE POLLUTION CONTROL

The permittee shall develop a written program describing the responsible parties for all construction activities which establishes measurable goals and reduces the discharge of sediment and construction materials from construction sites. The permittee through implementation of this program shall:

1. Complete inspections and enforcement following Wisconsin Construction Site Technical Standards found online at <http://dnr.wi.gov/topic/stormwater/standards/index>.
2. Discuss, communicate with, and require those responsible for the design, installation, and maintenance of construction site erosion control practices and storm water management facilities, including contractors for construction projects on SEWPBPD projects, the proper design, installation and maintenance of practices and facilities in accordance with ch. NR 151 and ch. NR 216, Wisconsin Administrative Code. This includes achieving requirement for those sites with less than 1 acre of land disturbance per s. NR 151.105, Wis. Adm.

Code.

3. Inspection of all land disturbing activities for proper erosion and sediment control weekly and within 24 hours after a rainfall event of 0.5 inch or greater. A “rainfall event” may be considered to be the total amount of rainfall recorded in any continuous 24-hour period. Inspection records must be kept onsite. A model inspection report is available online at <http://dnr.wi.gov/topic/stormwater/construction/forms.html>
4. Repair or replacement of erosion and sediment control BMPs must be completed as necessary within 24 hours of an inspection or notification indicating that repair or replacement is needed. Any changes made shall be noted in the inspection records.

E. POST-CONSTRUCTION STORM WATER MANAGEMENT

1. The SEWPBPD shall develop a written program which describes the system or legal mechanisms the District will use to ensure that all projects are designed and installed to meet State post-construction performance standards and the requirements of this permit.
2. All new post-construction stormwater BMPs shall have an accompanying operations and maintenance plan.

F. POLLUTION PREVENTION

The SEWPBPD shall develop and implement a written pollution prevention program and establish measurable goals for pollution prevention. The program shall include:

1. Continued inspection and maintenance of structural storm water management facilities owned or operated by the SEWPBPD to maintain their pollutant removal operating efficiency.
 - a) The stormwater detention pond shall be inspected on a quarterly basis.
 - b) The stormwater detention pond sediment depth evaluation shall be conducted at a minimum frequency of once every five years beginning the 2nd year of the permit term (calendar year 2022). Results of the evaluation must be documented in a report and submitted to the Department. Any maintenance activities involving the removal of accumulated sediment shall follow Ch. NR 528, Wis. Adm. Code requirements.
 - c) Ground cover must be maintained, and any cut material shall be removed to ensure maximum effectiveness of storm water management facilities, including removal of woody brush or trees. Invasive species shall be controlled to encourage establishment of native species consistent with the surrounding planting plan.
 - d) Sediment Plume Investigation. The District shall conduct an investigation to identify the source of sediment discharging from the stormwater pond by August 1, 2021. The District shall submit a report on investigation results by September 1, 2021.
2. Catch Basin Cleaning
 - a) Inspect each catch basin annually.
 - b) Clean out catch basins when greater than 45% full.
 - c) Implement a tracking system to document the date each catch basin is inspected, the sediment depth in each catch basin, and date of clean out.

d) The catch basin cleaning schedule may be modified if future storm water management planning and or modeling suggests changes are necessary to meet the performance standards and is approved by the Department.

3. Street Sweeping

a) Except during periods of snow cover, sweeping of ring roads and parking lots shall occur after each event at the District. During periods without events, street sweeping shall occur on roads at a minimum of once per month.

b) A written street sweeping plan that describes street sweeping standard operating procedures shall be developed and submitted for Department approval as part of the SEWPBPD Stormwater Management Program. Parking lots not used during November through March shall be swept on an as needed basis, as described in the street sweeping plan. Litter removal from SEWPBPD parking lots shall be considered as part of the street sweeping procedure. The street sweeping plan shall be reviewed for adequacy at a minimum of once per year. Proposed modifications to this plan shall be submitted to the Department for review and approval prior to implementation.

4. Material Disposal

a) Material collected through street sweeping and catch basin cleaning shall be handled and stored in a manner that prevents contamination of storm water runoff and shall be disposed of or beneficially reused in accordance with applicable solid and hazardous waste statutes and administrative codes. Non-storm water discharges to waters of the state associated with dewatering and drying material collected under subsection 2 and 3 of this section are not authorized by this permit.

Note: Information on managing waste and materials is available on the Department's Internet site at: <https://dnr.wisconsin.gov/topic/Waste>. Information on WPDES permits for non-storm water discharges is available on the Department's Internet site at: <https://dnr.wisconsin.gov/topic/Wastewater>.

5. Trash and Recycling Receptacles

a) The District shall develop a program to monitor and adjust the number and accessibility of available trash and recycling receptacles in SEWPBPD parking lots. The number of receptacles shall be reviewed for adequacy on a monthly basis and adjusted based upon observation of SEWPBPD representatives and event attendance. A summary of this review shall be included in the annual report.

6. Restrooms

a) The District shall develop a program to monitor and adjust the number and accessibility of restrooms in SEWPBPD parking lots. The number of restrooms and location shall be based upon projected attendance, weather, and observation of SEWPBPD representatives during events. The number of restrooms available shall be reviewed for adequacy on a monthly basis and adjusted as necessary. Summary of monthly reviews shall be submitted in the annual report.

Note: The Portable Sanitation Association International developed a chart of recommended number of restrooms based upon event attendance and duration. Additional factors to consider include temperature, alcohol consumption, and flux of use. The chart can be located here: <https://www.pesai.org/>.

7. Winter Road Management

- a) If road salt or other deicers are applied, no more shall be applied than the amount necessary to maintain public safety. The permittee shall develop and implement a written salt application or salt reduction strategy to minimize overapplication of deicers.
- b) All salt application equipment shall be calibrated annually beginning November 2021.
- c) Salt storage shall be in a manner consistent with State, Local, and Federal regulations.

Note: The Wisconsin Department of Transportation (WisDOT) Highway maintenance manual -Chapter 6, contains guidelines on winter maintenance including application of road salt and other deicers. Chapter 6 is available on the WisDOT's Internet site at: <https://wisconsindot.gov/Pages/doing-bus/local-gov/hwy-mnt/mntc-manual/chapter06.aspx>. The WisDOT highway salt storage requirements are contained in ch. Trans 277, Wis. Adm. Code.

8. Track the usage of pesticides, herbicides, and fertilizers on lawn and garden areas. Turf management on areas of 5 acres or more shall be completed in accordance with a nutrient management plan based upon appropriate soil tests.
9. Ensure appropriate staff is aware of general WPDES permits and requirements, such as the hydrostatic test water and water supply system water when discharging to the MS4. A list of these permits and requirements can be found at the following website: <http://dnr.wi.gov/org/water/wm/ww/pmttypes.htm#general>.
10. Storm Water Pollution Prevention Planning Activities
 - a) A Storm Water Pollution Prevention Plan (SWPPP) shall be developed and submitted to the department by December 31, 2021. The SWPPP shall include a description of procedures, good housekeeping activities, and any BMPs installed to reduce or eliminate storm water contamination. The SWPPP shall be updated when site conditions or operations change at the District. The SWPPP shall include the following items:
 - (1) Garbage and Recycling Operations
 - (2) Bulk Material Management and Storage, including street sweeping waste
 - (3) Leaf, brush, and lawn clipping management
 - (4) Any other activity at the site which can contaminate stormwater runoff.
 - b) Conduct and document quarterly visual inspections and an annual facility compliance inspection of Lot 13.
 - c) The permittee shall conduct annual training of staff on implementation of the SWPPP.

- d) If leaves and grass clippings are stored at Lot 13, they shall be kept in a manner to reduce runoff from storage piles. If materials will not be reused, they shall be disposed of in a timely manner.
 - e) The SWPPP shall include timeline for completing the activities in the Lot 13 Maintenance Plan submitted on February 18, 2021.
 - f) The District shall identify options to address the compactor leachate and runoff by February 1, 2022 and shall submit an evaluation of options to the Department. Options to consider include containment of runoff, covering the area, capture, treatment, connection to sanitary sewer or other methods identified by the District. By March 1, 2022, the District shall select an option to address the the compactor runoff and submit the proposal to the Department for approval. The District shall implement the selected option no later than March 1, 2023.
11. Continuing to implement, maintain and update, as necessary, the Stormwater Management Program. At a minimum, the Stormwater Management Manual shall be reviewed for adequacy on an annual basis. Revisions to the Stormwater Management Manual shall be submitted to the Department for review and approval prior to implementing the change. The SEWPBPD shall amend the Stormwater Management Manual if any of the following occur:
- a) When facility expansion or other activities are planned which will result in significant increases in the exposure of pollutants to storm water discharged either to waters of the state or to storm water treatment devices. The amendment shall contain a description of the new activities that contribute to the increased pollutant loading, planned source control activities that will be used to control pollutant loads, an estimate of the new or increased discharge of pollutants following treatment and, when appropriate, a description of the effect of the new or increased discharge on existing storm water treatment facilities.
 - b) The SEWPBPD finds through its inspection and maintenance of best management practices or through other means that the provisions of the Stormwater Management Manual are ineffective in controlling storm water pollutants discharged to waters of the state.
 - c) Upon written notice that the Department finds the Stormwater Management Manual to be ineffective in achieving the conditions of this permit

G. STORM WATER QUALITY MANAGEMENT

The SEWPBPD shall develop and implement a municipal storm water management program that control the discharge of total suspended solids from the MS4 system to waters of the state.

1. The storm water management program shall achieve compliance with the developed urban area performance standards of s. NR 151.13(2), Wis. Adm. Code, for those areas of the municipality that were not subject to the post-construction performance standards of s. NR 151.12 or 151.24, Wis. Adm. Code. (Note: projects prior to Oct. 1, 2004).
2. The permittee shall ensure continued operation and maintenance of all best management practices implemented on or before July 1, 2011 to achieve a total suspended solids reduction of more than 20 percent as compared to no controls.

H. STORM SEWER SYSTEM MAP

The SEWPBPD shall maintain a current municipal separate storm sewer system map. The municipal storm sewer system map shall include:

1. Identification of waters of the state, watershed boundaries, name and classification of receiving waters, and identification of whether the receiving water is listed as an impaired water under s. 303 (d) of the Clean Water Act.
2. Identification of all known municipal storm sewer system outfalls discharging to waters of the state or other municipal separate storm sewer systems. Each outfall shall be uniquely identified, and pipe size provided.
3. Stormwater drainage basin boundaries for each MS4 outfall, municipal separate storm sewer conveyance systems with flow direction, and other major municipal, government, or privately-owned storm water conveyance systems lying within, but not owned by the permittee shall be identified.
4. Location of any known discharge to the municipal separate storm sewer system that has been issued WPDES permit coverage by the Department.
5. Location of District owned or operated structural storm water controls including detention basins, infiltration basins, and manufactured treatment devices.
6. Identification of recreational areas and other open lands.
7. Location of municipal garages and other public works facilities.
8. A boundary defining the municipal border and the storm water planning area.
9. Identification of streets.
10. Identification of other potential sources of pollution.

I. AMENDMENTS

The permittee shall amend a program required under this permit as soon as possible if the permittee becomes aware that it does not meet a requirement of this permit. The permittee shall amend its program if notified by the Department that a program or procedure is insufficient or ineffective in meeting a requirement of this permit. The Department notice to the permittee may include a deadline for amending and implementing the amendment.

J. ANNUAL REPORT

The SEWPBPD shall submit an annual report by **March 31st of the following year** for each calendar year unless the Department authorizes biennial reporting to be submitted the 2nd (2023) and 4th year (2025) of the permit term pursuant to s. NR 216.07(8) Wis. Adm. Code. The

governing body, interest groups and the general public shall be provided opportunity to review and comment on the annual report. The annual report shall include:

1. An evaluation of program compliance, the appropriateness of identified BMPs, and progress towards achieving identified measurable goals. Any program changes made as a result of this evaluation shall be identified and described in the annual report. For any identified deficiencies towards achieving the requirements under Section II of this permit or lack of progress towards meeting a measurable goal, the permittee shall initiate program changes to improve their effectiveness.
2. Updated storm sewer system maps, where necessary, to identify any new outfalls, structural controls, or other noteworthy changes.
3. An IDDE Report that includes:
 - a) A summary of screen results from outfalls evaluated under Section II.C.2
 - b) Identified illicit discharges: A summary of each identified illicit discharge and follow up actions.
 - c) Spills: A summary of spills including location, material, quantity, and follow up actions.
4. A summary describing:
 - a) Public education programs for each of the six areas.
 - b) Street sweeping frequency and the amount collected.
 - c) Catch basin cleaning frequency and the amount collected.
 - d) Stormwater detention pond inspection and maintenance.
 - e) Lot 13 SWPPP inspections.
 - f) Pollutant Loading removal rates and status of meeting performance standards.
 - g) Any other activities that have measurable results.
5. A fiscal analysis which includes the annual expenditures and budget for the reporting year, and the proposed budget for the next year.
6. Identification of any known water quality improvements or degradation in the receiving water to which the permittee's MS4 discharges as required in Section I I. 1. Where degradation is identified, identify why and what actions are being taken to improve the water quality of the receiving water.
7. A duly authorized representative of the permittee shall sign and certify the annual report and include a statement or resolution that the permittee's governing body or delegated representatives have reviewed or been apprised of the content of the annual report.

8. The annual report and other required reports, and permit compliance documents shall be submitted electronically through the Department's electronic reporting system.

Note: The Department's electronic reporting system is Internet-based and available at: <https://dnr.wi.gov/permits/water/>. Municipal storm water permit eReporting information and user support tools can be found at: <https://dnr.wi.gov/topic/stormwater/municipal/eReporting.html>

K. REAPPLICATION FOR PERMIT COVERAGE

To remain covered after the expiration date of this permit, pursuant to s. NR 216.09, Wis. Adm. Code, the permittee shall submit an application package to the Department by **February 28, 2026** for continued coverage under a reissued version of this permit. The application package shall include:

1. For each storm water management program, the proposed program modifications and measurable goals for the next permit term. This includes specific actions and activities or structural BMPs and expected dates of implementation.
2. An assessment of the proposed storm water management program's adequacy to reduce pollutants to the MEP. The assessment must include:
 - a) Explanation and rationale on how implementation of the programs provides the highest level of performance that is achievable during the next permit term considering other environmental problems, technical capability, current technology, and available resources.
 - b) Estimate the additional pollution reduction and water quality benefits from the proposed action. This includes proposed BMPs for pollutants causing impairments not included in a TMDL.
3. A fiscal evaluation summarizing program expenditures for the current permit cycle and projected program allocations for the next permit cycle.
4. An updated estimate of annual storm water pollutant loads for TSS and TP. A description of how the pollutant loads were calculated shall be provided.
5. The established TMDL pollutant load reduction benchmarks, as required by Section III. A. 3.
6. The proposed fecal coliform reduction benchmarks for the next permit term, as discussed in Section III. A. 4.
7. Updated MS4 maps showing service boundary of the MS4, projected changes in land use and future growth, and industrial WPDES permittees which discharge to the MS4.

III. SPECIAL CONDITIONS

A. TOTAL MAXIMUM DAILY LOADS (TMDLs):

The Requirements of this section apply to discharges covered under the “Total Maximum Daily Loads for Total Phosphorus, Total Suspended Solids, and Fecal Coliform Milwaukee River Basin, Wisconsin” as approved by USEPA on March 9, 2018. The Permittee shall complete the following:

1. TMDL POLLUTANT LOAD REDUCTION EVALUATION FOR TSS AND TP:

The progress towards reducing TMDL pollutant loads shall be evaluated by the Permittee through modeling analysis, or through substantially similar or equivalent methods as approved by the Department. The results of the pollutant reduction evaluation shall be described in a report and submitted to the Department by July 31, 2024. The report must contain the following items:

- a) A map that identifies:
 - (1) The TMDL reachshed boundaries within the municipal boundary.
 - (2) The MS4 drainage boundaries within each TMDL reachshed.
 - (3) Identification of areas within the municipal boundary the permittee believes should be excluded from its analysis to show progress towards reducing TMDL pollutant loads.
 - (4) Structural BMPs and associated drainage area for each BMP used for pollutant reduction.
- b) The associated area, in acres, for each of the lands identified in Section III. A.1.a (1) through (4).
- c) An explanation for why the area identified in Section III. A.1.a (3) are to be excluded from analysis.
- d) The methodology and rationale used to evaluate progress towards reducing TMDL pollutant loads.
- e) For each reachshed, an estimate of the current pollutant loading without considering implementation of BMPs and an estimate of the current pollutant loadings considering BMP implementation. The difference between these two estimates is the existing load reduction. For privately owned BMPs, the permittee must have a maintenance agreement to count the load reduction.
- f) A comparison of the applicable TMDL WLA for each reachshed to the estimated pollutant loading with and without BMPs. The applicable TMDL reachshed reductions from the no controls condition are identified in Section VII.
- g) For each structural BMP, a tabular summary which identifies the type of BMP, area treated in acres, pollutant loading reduction efficiency, and documentation of the maintenance agreement for any private BMP.
- h) A description of the effectiveness of non-structural BMPs, if applicable, and the rationale for the selected approach.

- i) A narrative summarizing progress towards the applicable TMDL WLAs, and if applicable, existing TMDL benchmarks.
- j) If the permittee estimates that the TMDL WLAs are achieved with existing BMP implementation, the permittee must provide a statement supporting this conclusion.

2. WLA ATTAINMENT ANALYSIS:

The permittee shall complete an assessment of TSS and TP WLA attainment, including identifying information related to the type and extent of BMPs necessary to achieve the pollutant load reductions in the Milwaukee River Basin TMDL and the financial costs and other resources that may be associated with the implementation, operation and maintenance of BMPs. The analysis shall also consider current funding, alternative sources of funding, and operational efficiencies in relation to how additional pollutant reduction will be achieved. The results of the assessment must be submitted to the Department by January 30, 2025.

3. ESTABLISHMENT OF WLA BENCHMARKS FOR TSS AND TP

A TMDL pollutant reduction benchmark must be developed for TSS and TP where existing BMP implementation is not achieving the WLA. Updated pollutant benchmarks must be submitted by February 28, 2026. The submittal must include:

- a) The pollutant load reduction benchmark proposed to achieve additional progress towards the TMDL WLA during the next permit term (2026-2031).
- b) An explanation of the relationship between the TMDL WLA and the TMDL benchmark for each TMDL pollutant.
- c) A description of how SWMP implementation contributes to the overall reduction of the TMDL pollutants during the next permit term.
- d) Identification of additional BMPs or modified BMPs that will result in further reductions in the discharge of the applicable TMDL pollutants, including the rationale for proposing the BMPs.
- e) An estimate of current pollutant loading that reflect implementation of the current BMPs and the BMPs proposed to be implemented during the next permit term.

4. FECAL COLIFORM REDUCTION EFFORTS:

- a) Each permittee shall develop an action benchmark for bacteria for their Illicit Discharge Screening program as described in Section II. C. 2. f) by August 1, 2022.
- b) Fecal Coliform Inventory: By July 31, 2024, the permittee shall develop and submit to the Department an inventory of fecal coliform sources and a map indicating the locations of the potential sources of fecal coliform entering the MS4. The inventory shall be in tabular format and include a label code, location, description, and ownership of the source. The map shall identify the location of the sources by label code. The inventory shall consider flow variation in its identification of sources. The inventory and map shall include the following sources:
 - (1) Known or suspected leaking or failing septic systems

- (2) Sanitary sewer overflow locations
 - (3) Livestock and domesticated animals housed or raised within the MS4 permitted area and discharging into the MS4, but not including household pets
 - (4) Zoos, kennels, animal breeders, pet stores, and dog training facilities
 - (5) Waste hauling, storage, and transfer facilities
 - (6) Areas that attract congregations of nuisance urban birds and wildlife
 - (7) Known or suspected properties with inadequate food or organic waste handling or storage
 - (8) Composting sites or facilities
 - (9) Known or suspected areas with improper human sanitation use
 - (10) Any other source that the permittee identifies as discharging to the MS4
- c) By February 28, 2026, the permittee shall develop and submit to the Department a fecal coliform source elimination plan. The plan shall include:
- (1) Prioritization of source removal with and explanation of the prioritization criteria. Prioritization criteria shall include, at a minimum, fecal coliform source, exposure risk, ease of removal, and cost.
 - (2) A description of the type and extent BMPs to be employed to address each source.
 - (3) A cost estimate of BMP implementation, operation, and maintenance.
 - (4) A schedule for implementation of the bacteria elimination plan that reflects expeditious reduction with specific actions or benchmarks identified to be implemented during the next permit term.
 - (5) BMPs identified may be structural, non-structural, targeted outreach, new or revised ordinances, new design criteria, or new plan review considerations, but the plan shall include rationale for using each BMP, the reasons selection of each BMP, and the expected result of BMP implementation.

IV. COMPLIANCE SCHEDULE

The SEWPBPD shall comply with the specific permit conditions contained in Sections II and III of the permit in accordance with the schedule in Table 3. SEWPBPD shall begin implementing any updates to their stormwater management programs no later than August 1, 2022. Required reports and permit compliance documents shall be submitted electronically through the Department’s electronic reporting system.

Note: The Department’s electronic reporting system is Internet-based and available at: <https://dnr.wi.gov/permits/water/>. Municipal storm water permit eReporting information and user support tools can be found at: <https://dnr.wi.gov/topic/stormwater/municipal/eReporting.html>

Table 3: Implementation Schedule for Permit Requirements

PERMIT SECTION	ACTIVITY	COMPLIANCE DATE
Section I.I.1	Identify discharges to an impaired waterbody.	12 months after 303(d) list is updated.
Section II. F.1.d)	Report on Sediment Plume Investigation	September 1, 2021
Section II.F.7.b)	Pollution Prevention – Calibrate salt application machinery.	Annually beginning November 2021.
Section II.F.10.a)	Pollution Prevention – Submit storm water pollution prevention plans (SWPPP) for Lot 13.	December 31, 2021
Section II. F.1.b)	Pond Sediment Depth Evaluation	2022, and every 5 years after
Section II.F.10.g)	Identify options for compactor leachate and runoff	February 1, 2022
Section II.F.10.g)	Select option to address compactor leachate and runoff and submit to the Department for approval	March 1, 2022
Section II	Submit written Storm Water Management Program document updates and begin implementation.	August 1, 2022
Section III.A.4 a)	Total Maximum Daily Load—Develop bacteria action level for illicit discharge screening.	August 1, 2022
Section II.F.10.g)	Complete Implementation of BMPs to address compactor leachate and runoff	March 1, 2023

Section II.J	Submit Biennial Report for calendar year 2021 and 2022.	March 31, 2023
Section III.A.1	Total Maximum Daily Load—Submit pollutant reduction analysis report.	July 31, 2024
Section III.A.4 (b)	Total Maximum Daily Load—Submit fecal coliform source inventory.	July 31, 2024
Section III.A.2	Total Maximum Daily Load—Submit wasteload allocation attainment analysis.	January 30, 2025
Section II.J	Submit Biennial Report for calendar year 2023 and 2024.	March 31, 2025
Section II.K	Submit Permit Application	February 28, 2026
Section III.A.3	Total Maximum Daily Load—Submit TSS and TP benchmarks for the next permit term.	February 28, 2026
Section III.A.4 (c)	Total Maximum Daily Load—Submit fecal coliform source elimination plan.	February 28, 2026

V. STANDARD CONDITIONS

The conditions in s. NR 205.07(1) and (3), Wis. Adm. Code, are incorporated by reference in this permit. The Menomonee River Watershed Permittees shall meet these requirements. Some of these requirements are outlined below in paragraph A. through R. Requirements not specifically outlined below can be found in s. NR 205.07(1) and (3), Wis. Adm. Code.

A. DUTY TO COMPLY:

The municipalities shall comply with all conditions of the permit. Any permit noncompliance is a violation of the permit and is grounds for enforcement action, permit revocation or modification, or denial of a permit reissuance application.

B. COMPLIANCE SCHEDULES:

Reports of compliance or noncompliance with interim and final requirements contained in any compliance schedule of the permit shall be submitted in writing within 14 days after the schedule date, except that progress reports shall be submitted in writing on or before each schedule date for each report. Any report of noncompliance shall include the cause of noncompliance, a description of remedial actions taken, and an estimate of the effect of the noncompliance on the municipality's ability to meet the remaining schedule dates.

C. NONCOMPLIANCE NOTIFICATION:

1. Upon becoming aware of any permit noncompliance that may endanger public health or the environment, each municipality shall report this information by a telephone call to the Department within 24 hours. A written report describing the noncompliance shall be submitted to the Department within 5 days after the municipality became aware of the noncompliance. The Department may waive the written report on a case-by-case basis based on the oral report received within 24 hours. The written report shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times; the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance; and if the noncompliance has not been corrected, the length of time it is expected to continue.
2. Reports of any other noncompliance not covered under General Condition's B, C.1, or E shall be submitted with the annual report. The reports shall contain all the information listed in General Condition C.1.

D. DUTY TO MITIGATE

Each municipality shall take all reasonable steps to minimize or prevent any adverse impact on the waters of the state resulting from noncompliance with the permit.

E. SPILL REPORTING

The permittee shall immediately notify the Department, in accordance with s. 292.11(2)(a), Wis. Stats., which requires any person who possesses or controls a hazardous substance or who causes the discharge of a hazardous substance to notify the DNR immediately of any discharge not authorized by the permit. The discharge of a hazardous substance that is not authorized by

this permit or that violates this permit may be a hazardous substance spill. To report a hazardous substance spill, call the DNR's 24-hour HOTLINE at 1-800-943-0003.

Note: For details on state and federal reportable quantities, visit:

<https://dnr.wi.gov/topic/Spills/define.html>

F. PROPER OPERATION AND MAINTENANCE:

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the municipality to achieve compliance with the conditions of the permit and the storm water management program. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with conditions of this permit.

G. BYPASS:

The Permittee may temporarily bypass storm water treatment facilities if necessary for maintenance, or due to runoff from a storm event which exceeds the design capacity of the treatment facility, or during an emergency.

H. DUTY TO HALT OR REDUCE ACTIVITY:

Upon failure or impairment of best management practices identified in the storm water management program, each municipality shall, to the extent practicable and necessary to maintain permit compliance, modify or curtail operations until the best management practices are restored, or an alternative method of storm water pollution control is provided.

I. REMOVED SUBSTANCES:

Solids, sludges, filter backwash or other pollutants removed from or resulting from treatment or control of storm water shall be stored and disposed of in a manner to prevent any pollutant from the materials from entering the waters of the state, and to comply with all applicable Federal, State, and Local regulations.

J. ADDITIONAL MONITORING:

If a municipality monitors any pollutant more frequently than required by the permit, the results of that monitoring shall be recorded and reported in accordance with this chapter. Results of this additional monitoring shall be included in the calculation and reporting of the data submitted in the annual report.

K. INSPECTION AND ENTRY:

Each municipality shall allow an authorized representative of the Department, upon the presentation of credentials, to:

1. Enter upon the municipal premises where a regulated facility or activity is located or conducted, or where records are required under the conditions of the permit.
2. Have access to and copy, at reasonable times, any records that are required under the conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under the permit.
4. Sample or monitor at reasonable times, for the purposes of assuring permit compliance, any substances or parameters at any location.

L. DUTY TO PROVIDE INFORMATION:

Each municipality shall furnish the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking or reissuing the permit or to determine compliance with the permit. Each municipality shall also furnish the Department, upon request, copies of records required to be kept by the municipality.

M. PROPERTY RIGHTS:

The permit does not convey any property rights of any sort, or any exclusive privilege. The permit does not authorize any injury or damage to private property or an invasion of personal rights, or any infringement of federal, state or local laws or regulations.

N. DUTY TO REAPPLY:

If any of the Menomonee River Watershed Permittees wish to continue an activity regulated by the permit after the expiration date of the permit, the municipality shall apply for a new permit at least 180 days prior to the expiration date of the permit. If a timely and complete application for a new permit is filed and the permit is not reissued by the time the existing permit expires, the existing permit remains in effect until the application is acted upon.

O. OTHER INFORMATION:

Where a municipality becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or in any report to the department, it shall promptly submit such facts or correct information to the department.

P. RECORDS RETENTION:

Each municipality shall retain records of all monitoring information, copies of all reports required by the permit, and records of all data used to complete the application for the permit for a period of at least 5 years from the date of the sample, measurement, report or application. The Department may request that this period be extended by issuing a public notice to modify the permit to extend this period.

Q. PERMIT ACTIONS:

As provided in s. 283.53, Wis. Stats., after notice and opportunity for a hearing the permit may be modified or revoked and reissued for cause. If a municipality files a request for a permit modification, revocation or reissuance, or a notification of planned changes or anticipated noncompliance, this action by itself does not relieve the municipalities of any permit condition.

R. SIGNATORY REQUIREMENT:

All applications, reports or information submitted to the Department shall be signed for by a ranking elected official, or other person authorized by them who has responsibility for the overall operation of the municipal separate storm sewer system and storm water management program activities regulated by the permit. The representative shall certify that the information

was gathered and prepared under their supervision and based on inquiry of the people directly under their supervision that, to the best of their knowledge, the information is true, accurate, and complete.

S. ENFORCEMENT ACTION:

The Department is authorized under s. 283.89 and 283.91, Wis. Stats., to use citations or referrals to the Department of Justice to enforce the conditions of this permit. Violation of a condition of this permit is subject to a fine of up to \$10,000 per day of violation.

T. ATTAINMENT OF WATER QUALITY STANDARDS AFTER AUTHORIZATION:

Except for situations where a TMDL has been approved by US EPA during the permit term, at any time after authorization, the Department may determine that the discharge of storm water from a permittee's MS4 may cause, have the reasonable potential to cause, or contribute to an excursion of any applicable water quality standard. If such determination is made, the Department may require the permittee to do one of the following:

1. Develop and implement an action plan to address the identified water quality concern to the satisfaction of the Department.
2. Submit valid and verifiable data and information that are representative of ambient conditions to demonstrate to the Department that the receiving water or groundwater is attaining the water quality standard.

VI. DEFINITIONS

Definitions for some of the terms found in this permit are as follows:

- A. Department** means the Wisconsin Department of Natural Resources.
- B. Development** means residential, commercial, industrial and institutional land uses and associated roads.
- C. Erosion** means the process by which the land's surface is worn away by the action of wind, water, ice or gravity.
- D. Hazardous substance** means any substance or combination of substances including any waste of a solid, semisolid, liquid or gaseous form which may cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating reversible illness or which may pose a substantial present or potential hazard to human health or the environment because of its quantity, concentration or physical, chemical or infectious characteristics. This term includes, but is not limited to, substances which are toxic, corrosive, flammable, irritants, strong sensitizers or explosives as determined by the Department.
- E. Illicit connection** means any man-made conveyance connecting an illicit discharge to a municipal separate storm sewer system.
- F. Illicit discharge** means any discharge to a municipal separate storm sewer system that is not composed entirely of storm water except discharges authorized by a WPDES permit or other discharge not requiring a WPDES permit such as landscape irrigation, individual residential car washing, firefighting, diverted stream flows, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, lawn watering, flows from riparian habitats and wetlands, and similar discharges. However, the occurrence of a discharge listed above may be considered an illicit discharge on a case-by-case basis if the permittee or the Department identifies it as a significant source of a pollutant to waters of the state.
- G. Impaired water** means a waterbody impaired in whole or in part and listed by the Department pursuant to 33 USC § 1313(d)(1)(A) and 40 CFR 130.7, for not meeting a water quality standard, including a water quality standard for a specific substance or the waterbody's designated use.
- H. Infiltration** means the entry and movement of precipitation or runoff into or through soil.
- I. Jurisdiction** means the area where the permittee has authority to enforce its ordinances or otherwise has authority to exercise control over a particular activity of concern.
- J. Land disturbing construction activity** means any man-made alteration of the land surface resulting in a change in the topography or existing vegetative or non-vegetative soil cover that may result in storm water runoff and lead to increased soil erosion and movement of sediment

into waters of the state. Land disturbing construction activity includes clearing and grubbing, demolition, excavating, pit trench dewatering, filling and grading activities.

K. Maximum Extent Practicable has the meaning given it in s. NR 151.002(25), Wis. Adm. Code.

L. Major outfall means a municipal separate storm sewer outfall that meets one of the following criteria:

1. A single pipe with an inside diameter of 36 inches or more, or from an equivalent conveyance (cross sectional area of 1,018 square inches) which is associated with a drainage area of more than 50 acres.
2. A municipal separate storm sewer system that receives storm water runoff from lands zoned for industrial activity that is associated with a drainage area of more than 2 acres or from other lands with 2 or more acres of industrial activity, but not land zoned for industrial activity that does not have any industrial activity present.

M. Municipality means any city, town, village, county, county utility district, town sanitary district, town utility district, school district or metropolitan sewage district or any other public entity created pursuant to law and having authority to collect, treat or dispose of sewage, industrial wastes, storm water or other wastes.

N. Municipality Operated BMP means a structural storm water management practice or BMP which is not owned by the Municipality which the municipality has a maintenance agreement with the owner and takes credit for pollutants removed from the BMP.

O. Municipal Separate Storm Sewer System or MS4 means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, constructed channels or storm drains, which meets all of the following criteria:

1. Owned or operated by a municipality.
2. Designed or used for collecting or conveying storm water.
3. Which is not a combined sewer conveying both sanitary and storm water.
4. Which is not part of a publicly owned wastewater treatment works that provides secondary or more stringent treatment

P. New MS4 discharge of a pollutant means an MS4 discharge that would first occur after the permittee's original date of initial coverage under an MS4 permit to a surface water to which the MS4 did not previously discharge storm water, and does not include an increase in an MS4's discharge to a surface water to which the MS4 discharged on or before coverage under this permit.

- Q. Outfall** means the point at which storm water is discharged to waters of the state or to a storm sewer (e.g., leaves one municipality and enters another).
- R. Permittee** means a person who has applied for and received WPDES permit coverage for storm water discharge. For the purposes of this permit, permittee is the owner or operator of a municipal separate storm sewer system authorized to discharge storm water into waters of the state.
- S. Permitted area** means the areas of land under the jurisdiction of the permittee that drains into a municipal separate storm sewer system, which is regulated under a permit issued pursuant to Subch. I of NR 216, Wis. Adm. Code
- T. Pollutants of concern** means a pollutant that is causing impairment of a waterbody.
- U. Reach** means a specific stream segment, lake or reservoir as identified in a TMDL.
- V. Reachshed** means the drainage area contributing runoff to a given reach.
- W. Redevelopment** means areas where development is replacing older development.
- X. Riparian landowners** are the owners of lands bordering lakes and rivers.
- Y. Sediment** means settleable solid material that is transported by runoff, suspended within runoff or deposited by runoff away from its original location.
- Z. Start Date** is the date of permit coverage under this permit, which is specified in the Department letter authorizing coverage.
- AA. Storm water management practice or Best Management Practice (BMP)** means structural or non-structural measures, practices, techniques or devices employed to avoid or minimize soil, sediment or pollutants carried in stormwater runoff to waters of the state.
- BB. Storm Water Pollution Prevention Plan or SWPPP** refers to the development of a site-specific plan that describes the measures and controls that will be used to prevent and/or minimize pollution of storm water.
- CC. Total maximum daily load or TMDL** means the amount of pollutants specified as a function of one or more water quality parameters, that can be discharged per day into a water quality limited segment and still ensure attainment of the applicable water quality standard.
- DD. Urbanized area** means a place and the adjacent densely settled surrounding territory that together have a minimum population of 50,000 people, as determined by the U.S. bureau of the census based on the latest decennial federal census.

EE. Wasteload Allocation or WLA means the allocation resulting from the process of distributing or apportioning the total maximum daily load to each individual point source discharge.

FF. Waters of the State has the meaning given it in s. 283.01(20), Wis. Stats.

GG. WPDES permit means a Wisconsin Pollutant Discharge Elimination System permit issued pursuant to ch. 283, Wis. Stats.

VII. TSS AND TP WASTELOAD ALLOCATIONS

The following tables identifies the total suspended solids (TSS) and total phosphorus (TP) reduction goals for each reachshed identified in the “Total Maximum Daily Loads for Total Phosphorus, Total Suspended Solids, and Fecal Coliform Milwaukee River Basin, Wisconsin” Report. The values represent the load reductions required from a no-controls scenario.

Table 1: Milwaukee River Basin

Reachshed (TMDL Subbasin)	Waterbody Name	Waterbody Extents	TSS % Reduction from No-controls	TP % Reduction from No-controls
MN-16	Menomonee River	From Estuary to Honey Creek	72.0%	49.4%

Note: **The TMDL did not assign a percent reduction for these reachsheds because modeling indicated that there is no direct MS4 discharge to this subbasin. If more detailed analysis conducted by the permittee indicates the presence of an MS4 discharge, contact your DNR storm water engineer or specialist for more information on how best to proceed.

**Appendix B – State of Wisconsin Department of Natural Resources Illicit
Discharge Detection and Elimination Guidance (March 2012, 3800-2012-01)**

CORRESPONDENCE/MEMORANDUM

DATE: March 15, 2012

TO: SW Program Staff

FROM: Pam Biersach – Bureau Director
Bureau of Watershed Management 

SUBJECT: Program Guidance #3800-2012-01

Illicit Discharge Detection and Elimination Guidance
March 2012
3800-2012-01

This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

A. Statement of Problem Being Addressed

Limited information is available to assist municipalities with the development of an effective program to determine the presence of illicit discharges from storm sewer system outfalls.

B. Background

State and federal storm water discharge regulations require permitted municipal separate storm sewer systems (MS4s) to develop, implement and enforce a program to detect and remove illicit connections and discharges to the MS4. In Wisconsin, this requirement is established in s. NR 216.07(3), Wis. Adm. Code. The program must include routine dry weather field screening at storm sewer system outfalls and procedures for locating the source of known or suspected illicit discharges. If flow is observed, a combination of sensory observations and indicator parameter sampling must be used to determine the presence of illicit discharges and assist in the tracking, location and elimination of sources.

C. Discussion

Section NR 216.07(3)(i), Wis. Adm. Code, requires that field screening is conducted at all major outfalls and any additional outfalls designated by the municipality or Department. Field screening must include the following when flow is observed:

- Narrative descriptions of color, odor, turbidity, oil sheen, surface scum, flow rate and other relevant observations.
- Sampling for pH, total chlorine, total copper, total phenol and detergents unless Department

approval has been obtained for alternative parameters such as ammonia, potassium or bacteria.

The combination of sensory and indicator parameters is intended to provide insight regarding the presence and potential sources of illicit discharges. However, ch. NR 216, Wis. Adm. Code does not identify specific discharge limits, action levels or other criteria that should be used to determine if an illicit discharge is either present or absent. In addition, ch. NR 216, Wis. Adm. Code does not address the following:

- Selection of outfalls for on-going field screening after the initial major outfall field screening has been completed.
- Frequency and timing of outfall field screening activities.
- Outfalls with baseflow consisting of groundwater and other non-illicit discharges.
- Submerged, enclosed, or otherwise inaccessible outfalls.
- Outfalls from pumped storm water systems.
- Outfalls from swale conveyance systems and storm water treatment practices.
- Proper documentation and evaluation of outfall field screening activities.

The purpose of this guidance document is to provide supplemental information that can be used by MS4 owners and operators to maximize the efficiency and effectiveness of illicit discharge detection and elimination programs.

D. Guidance

Outfall Selection

Currently, MS4 permits include a requirement that field screening is initially conducted at all major outfalls¹. However, a more targeted approach to illicit discharge detection and elimination (IDDE) is recommended. Outfalls should be prioritized based on illicit discharge potential in the contributing drainage area rather than solely on pipe or drainage area size. Outfalls selected for on-going field screening based on illicit discharge potential are considered “priority outfalls”. Contributing drainage area characteristics or land uses that should be considered when selecting priority outfalls include:

- History of known or suspected illicit discharges reported within the last five years
- Sections of storm sewer and/or sanitary sewer infrastructure that have exceeded or are approaching their design/useful life.
- Contributing drainage areas with 80 or more percent imperviousness.

¹ “Major outfall” means a municipal separate storm sewer system outfall that meets one of the following criteria:

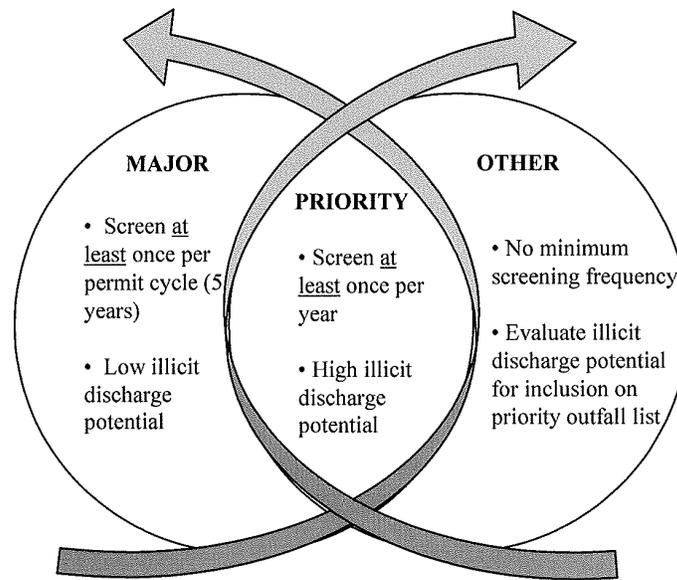
- (a) A single pipe with an inside diameter of 36 inches or more, or from an equivalent conveyance which is associated with a drainage area of more than 50 acres.
- (b) A single pipe with an inside diameter of 12 inches or more, or from an equivalent conveyance which receives storm water runoff from lands zoned for industrial activity with 2 or more acres of industrial activity.

- Business or industrial parks with frequent changes in property ownership or operations.
- Schools or other institutional facilities.
- Commercial or industrial operations that generate wastewater or wash water including food processing, metal plating or machining shops, auto and scrap recyclers, commercial car washes and chemical manufactures or users.

Frequency

The recommended approach to outfall field screening frequency is depicted in Figure 1. All priority outfalls should be screened at least once per year. In some cases, it may be appropriate to conduct more than one field screening per year at a particular priority outfall depending on initial screening results or illicit discharge potential. All other major outfalls not identified as priority outfalls should be screened at least once during each MS4 permit cycle (i.e., 5 years). The priority outfall list should be reviewed and modified if necessary during an annual program evaluation.

Figure 1 - Outfall Field Screening Frequency



Timing

Outfall field screening must be conducted during dry weather periods to minimize potential interference from non-illicit sources including runoff and groundwater. In general, field screening should not be conducted within 48 hours after a precipitation event that produces runoff. However, it may be necessary to wait longer than 48 hours after precipitation events depending on contributing drainage area characteristics, the presence of extended discharges from stormwater facilities or the size of the event. Field screening during periods of high groundwater, such as the early spring, should be avoided. However, spring or fall screening may be necessary if outfall access is significantly obstructed by vegetation.

Sensory Parameters

Obvious illicit discharges can potentially be identified by color, odor or other physical characteristics such as sheen or foam. However, proper interpretation of sensory observations can be complicated by the fact that some sources are naturally occurring (e.g., iron bacteria) or non-illicit (e.g., dye testing).

Chapter 11 of the Center for Watershed Protection's guidance manual for illicit discharge detection and elimination includes photos of common physical indicators for illicit and non-illicit sources. The entire manual can be downloaded from the USEPA website at http://www.epa.gov/npdes/pubs/idde_manualwithappendices.pdf

Indicator Parameters

Indicator parameter sampling is necessary to confirm sensory observations or distinguish illicit from non-illicit discharges. The following parameters are recommended for all observed discharges: **Ammonia, Detergents, pH and Total Chlorine**. Based on MS4 or outfall specific conditions, the following additional parameters should be considered:

- **Total Copper** in areas where industrial facilities that use or manufacture copper-based products are present.
- **Phenol** in areas where industrial facilities that utilize phenol in processes or products are present.
- **Potassium** when discharges of industrial wastewater or sanitary sewage are suspected.
- **Fluoride** when discharges with a drinking water supply component are suspected.
- **E. coli or Bacteriodes** when discharges of sanitary sewage are suspected.

The recommended parameters for all observed discharges are a deviation from the parameter lists identified in ch. NR 216, Wis. Adm Code and MS4 permits. Permitted MS4s should submit modified parameter list proposals to the Department for approval prior to implementation.

Test Methods

In order to provide relatively rapid results, indicator parameters should be analyzed using field test kits. However, field test kits should be used by staff with appropriate training and experience. Laboratory analysis is necessary for some parameters (e.g., E. coli, Bacteriodes) and recommended in cases where enforcement action may be necessary to eliminate illicit discharges or connections.

Action Levels

Recommended action levels for indicator parameters are found in Table 1. Sample results above these levels suggest the presence of an illicit discharge is likely. However, illicit discharges or connections should not be automatically ruled out in cases where parameters are detected below the recommended action levels. In some instances, illicit discharges can be masked by non-illicit sources depending on the time of the year, recent precipitation events, or other conditions, especially at outfalls with large

contributing drainage areas. With this in mind, the recommended action levels should be considered as starting points for decision making. Ultimately, identifying outliers to expected or past levels may be more important when determining if further investigation should be initiated. To determine when an outlier has been detected, each MS4 should maintain a database (or equivalent record) of indicator parameter test results for individual outfalls or groups of outfalls.

TABLE 1 – Indicator Parameters Action Levels

Parameter	Action Level	Illicit Sources	Non-Illicit Sources
Ammonia	0.1 mg/l	Sanitary sewage and industrial wastewater	Pets, wildlife and potentially WPDES permitted discharges
Detergents	0.5 mg/l	Industrial cleansers, commercial wash water and sanitary sewage	Residential car washing
pH	Less than 6 or greater than 9	Industrial wastewater and concrete truck wash-out	Groundwater and WPDES permitted discharges
Total Chlorine	Detection or positive test unless associated with a WPDES permitted discharge at background water supply levels	Industrial wastewater, swimming pools and sanitary sewage	WPDES permitted discharges
Total Copper	0.1 mg/l	Copper-based product use and manufacturing	WPDES permitted discharges
Phenol	Detection or positive test	Chemical, textile, paint, resin, tire, plastic, electronics and pharmaceutical manufacturing	None
Fluoride	Detection above background groundwater or water supply levels	Commercial and industrial wastewaters with a water supply component	Groundwater and WPDES permitted discharges
Potassium	10 mg/l	Sanitary sewage and industrial wastewater	Groundwater and WPDES permitted discharges
E. coli	10,000 MPN/100 mL	Sanitary sewage	Wildlife and pets
Human Bacteriodes	Detection or positive test	Sanitary sewage	None

Additional considerations for some of the indicator parameters are as follows:

- Field test methods for **detergents** are generally considered qualitative (i.e., positive or negative) tests. Some detergent test methods produce bubbles or a gel like substance that can be misinterpreted as a positive test for detergents. In addition, specific detergent test methods, such as the MBAS method, may not be capable of detecting all classes of detergents. Another potential

issue with detergent testing is distinguishing non-illicit discharges associated with residential car washing from illicit discharges.

- **Chlorine** residuals are typically short lived in the environment. Detection of chlorine at an outfall generally indicates a source that is relatively close to the outfall. However, chlorine detected at an outfall can be from an illicit or non-illicit source if chlorinated municipal drinking water supply is a component of the discharge (see “Non-Illicit Sources”).
- Leaching of **copper** from plumbing systems can be a source of copper even in areas where copper-based product use or manufacturing does not occur.
- Municipal drinking water supply systems that add **fluoride** typically maintain levels between 1 and 1.5 mg/l.
- **E. coli** is a commonly used sanitary sewage indicator. However, dry weather flow outfall monitoring in Wisconsin and other states indicates that E. coli levels are highly variable and can be produced by naturally occurring, non-illicit sources in the environment such as raccoons in storm sewers. Elevated dry weather E. coli levels in conjunction with detection of other indicator parameters (e.g., detergents, total chlorine) may be more indicative of the presence of sanitary sewage.
- The ratio of human **Bacteriodes** to total Bacteriodes may be particularly useful in determining sanitary sewage sources. However, the availability of Bacteriodes testing may be limited.

Non-Illicit Sources

Indicator parameters can be detected from non-illicit sources such as groundwater inflows, non-contact cooling water discharges or other WPDES permitted discharges from commercial and industrial facilities:

- **Groundwater:** Flow rates associated with groundwater inflows can vary seasonally due to fluctuations in groundwater elevations. Groundwater inflows are typically highest in the early spring and lowest in the late summer. In some areas, groundwater inflows will also include natural levels of fluoride. Baseline conditions for outfalls with groundwater inflows can be established by documenting seasonal flow rates and/or fluoride levels over time. If baseline conditions have been established for an outfall, sampling for other indicator parameters can be avoided if flow rates and/or fluoride levels are consistent with the established baseline values.
- **Permitted Facilities:** In some areas, WPDES permitted industrial facilities are allowed to discharge wastewater to MS4s as long as discharge limits are met. These discharges can produce continuous or nearly continuous flows at outfalls. WPDES permitted discharges are considered non-illicit but can include one or more of the indicator parameters at detectable levels. In many cases, municipal drinking water supply is a component of WPDES permitted discharges and it may be difficult to distinguish non-illicit from illicit sources in these areas. However, establishing baseline flow rates and parameter levels for outfalls with WPDES permitted discharges is recommended. If necessary, the Department can assist in the identification and characterization of WPDES permitted discharge, including discharge limits.

The Department maintains a listing of current WPDES permit holders online:

- **WPDES Wastewater Permittees**
<http://dnr.wi.gov/org/water/wm/ww/permlists.htm>
- **WPDES Industrial Storm Water Permittees**
<http://dnr.wi.gov/runoff/stormwater/industrial/>

Submerged & Enclosed Outfalls

It may be difficult or impossible to conduct outfall field screening activities at outfalls that are fully or partially submerged by receiving waters or located within enclosed waterways. For these cases, field screening activities should be conducted at appropriate upstream manholes. On-site illicit connection inspections should be considered for any high risk facilities that can potentially discharge to the MS4 between the outfall and field screening manholes. Another option to consider is televising the storm sewer segments located between field screening manholes and the outfall.

Physically Interconnected Systems

One MS4 that discharges directly to a second MS4 is considered physically interconnected. The point of interconnection is considered an outfall from the upstream or discharging MS4. Although field screening activities should be conducted by the upstream MS4 at the point of interconnection, it may be appropriate for interconnected MS4s to coordinate and potentially consolidate field screening activities.

Pump Stations

For pumped storm water systems, field screening activities should be conducted at appropriate manholes located upstream from the pump station or intake. If the first upstream manhole from the pump station is submerged, the pump should be operated if possible to remove accumulated water from the storm sewer system prior to conducting field screening activities.

Swales Conveyance Systems

For swale conveyance systems, it may be appropriate to conduct a visual or “windshield” survey within the swale area in conjunction with or as an alternative to field screening at the outfall. Locations where piped systems discharge to swales should be targeted during windshield surveys.

Storm Water Practices

Wet detention basins and other storm water treatment practices can potentially mask the presence of illicit discharges from the storm sewer system. Field screening activities should be conducted at inlets to storm water treatment practices rather than from the outlet. However, the size and location of practices can be considered when determining if field screening at inlets is necessary.

Appendix C – Recommended IDDE Screening Equipment

Clipboard
Cooler – Provided by Lab (ice can be obtained from local gas station in the event samples are collected)
First Aid Kit
Flashlight
Flow Meter
Handheld GPS Unit
Identification Badge
Insect Repellant
Inspection Form
Field Test Kit (typical colorimetric – such as LaMotte – refer to SDS and use proper precautions for handling of chemicals) unless Lab will sample
Manhole Cover Hook (permission by SEWPBPD)
pH Meter or Paper
Pens – Permanent (Sharpie™)
Phone with Camera
PPE: Nitrile/Latex gloves, work gloves, hi-vis safety vest, life jacket, safety glasses/goggles, steel-toe boots or other appropriate footwear, orange vehicle cones/strobes, etc.
Resealable Plastic Bags for Sample Bottles
Rubber boots/Waders
Sample Bottles (clean) – Provided by Lab
Storm Sewer System Map
Sunscreen
Tape Measure
SEWPBPD Program Manual IDDE

Appendix D - IDDE Inspection Form

Appendix E – DNR Hazardous Substance Spills Publication



DNR Staff Provide Spill Response and Support

Rarely does anyone ever plan a spill. Spills are typically caused by accidents of some sort, but when they do occur, the people involved with a spill must comply with state requirements. Wisconsin law mandates that spills of hazardous substances be immediately reported and cleaned up to protect Wisconsin's citizens and natural resources. When a spill occurs, the DNR has staff located in regional offices around the state to help in a variety of ways.

Responding to Spills

During Normal Working Hours

When calls are made to the DNR spill hotline during the day, the information comes directly to the DNR office in Madison and is forwarded to the Regional Spill Coordinator for follow-up.

After Hours

During the evening hours and on weekends, the phone calls are directed to the Wisconsin State Patrol, who will forward the information to a DNR duty officer. That duty officer will then alert the On-Call Spill Coordinator to the situation.

DNR Field Response

DNR Wardens and Regional Spill Coordinators

The first responders to a hazardous substance spill for the DNR may be a field warden or regional spill coordinator. Wardens are more likely to respond in remote areas since they are widely distributed across the state. Each county has at least one warden. Wardens know local responders, such as fire and police personnel, are familiar with the natural resources impacted by a spill and can assist the responsible party in managing the spill.

Spill coordinators (working in the DNR's Remediation and Redevelopment Program) are located in each of the regional DNR offices. These spill coordinators specialize in technical spill response issues and are available before, during, and after spills occur.

When a field warden or regional spill coordinator gets a call about a spill, their follow up may include additional phone calls to get more information about the nature of the spill, going to the site, and/or requesting other DNR assistance (e.g., fish managers, water resources staff and public information specialists).

When an emergency occurs and the responsible party is not available or willing to take action, the DNR will call in a zone contractor to respond to the spill. Zone contractors are emergency response companies that provide statewide emergency response services in such situations.

These companies normally provide a response within two hours of notification, and specialize in emergency response, spill containment and removal. They can assess a situation, take actions to prevent spilled materials from harming the public or the environment, sample substances to determine how to manage them, contain the spilled materials and remove those substances from the spill site to a secure facility until analyses are completed to determine their final placement. After the response, the department will seek cost recovery from the responsible party.

**The DNR encourages
the public to report
hazardous substance
spills using the
24-hour toll-free
hotline:
1-800-943-0003**

Assistance Before a Spill

The spill coordinators are part of local planning and response networks. They work with local emergency planning agencies, talk to the local fire departments about spill response issues, and work with the wardens to ensure a consistent DNR approach to spill response. In addition, the spill coordinators work with local industries who may handle hazardous substances as part of their business to provide them with technical support for spill prevention as well as spill response.

Assistance After a Spill

When a spill occurs, field wardens and spill coordinators can provide assistance in a variety of ways. The DNR has developed spill packets that are provided to persons who are responsible for the release. Included in these packets is information on DNR regulations, additional DNR contacts, as well as listings of local contractors and waste management organizations that can assist the responsible party in management of the residual spilled material. The responsible party often consults with the spill coordinators for technical advice, since they are familiar with DNR regulations relating to spill containment and cleanup. Although smaller cleanups may not receive direct DNR oversight, the coordinators can answer questions and guide responsible parties through the process.

RR Program State Spill Response Team

The DNR manages spills through the RR Program's Spill Response Team. This team is comprised of a state spill coordinator, a state emergency management coordinator, a federal removals coordinator, the five regional spill coordinators and legal counsel. These staff meet regularly to identify and resolve spill response issues and help make spill response efforts in Wisconsin as effective as possible.

For more information, please see visit dnr.wi.gov and search "Spills."

Northeast Region Spill Coordinator

Maizie Reif 920-360-4291 (Green Bay)

Northern Region Spill Coordinator

Jeff Paddock 715-828-8544 (Rhinelander)

Southeast Region Spill Coordinator

Riley Neumann 414-750-7030 (Milwaukee)

South Central Region Spill Coordinator

Trevor Bannister 608-347-0058 (Fitchburg)

West Central Region Spill Coordinator

Jayson Schrank 715-410-8841 (Eau Claire)

State Spill & Federal Removals Coordinator

Issac Ross 414-750-7140 (Madison)

State Emergency Response Coordinator

David Woodbury 608-266-2598 (Madison)

Legal Counsel

Bill Nelson 608-267-7456 (Madison)

This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts. This publication is available in alternative format (large print, Braille, etc.) upon request. Please call for more information. Note: If you need technical assistance or more information, call the Accessibility Coordinator at 608-267-7490 / TTY Access via relay - 711.

Appendix G – Emergency Contacts

Contact	Phone Number
Pat Goss, Executive Director, SEWPBPD	414-902-4042 608-772-6036 (cell)
Kristi Kreklow, Associate Director, SEWPBPD	414-902-4045 414-628-5933 (cell)
Mike Brockman, MBBC	414-902-4443 414-588-7931 (cell)
Emergency/Fire/Ambulance/Police/HazMat Response	911
Milwaukee County Office of Emergency Management	414-278-4709
Wisconsin DNR 24 Hour Spill Reporting Hotline	800-943-0003
U.S. EPA Region V Spill Reporting	312-353-2318
National Response Center (any spill)	800-424-8802
City of Milwaukee	414-286-0515/414-286-0514
Village of West Milwaukee	414-645-6236/414-645-2151
WI DOT	608-266-0279

TAB 3

CONSTRUCTION SITE POLLUTION CONTROL (Permit Section II.D.)

**SOUTHEAST WISCONSIN PROFESSIONAL BASEBALL PARK DISTRICT (“SEWPBPD”)
WPDES PERMIT No. WI-S049921-04
Program Manual – Construction Site Pollution Control
Last Update: May 2022**

Program Manual

Construction Site Pollution Control

Southeast Wisconsin Professional Baseball Park District (SEWPBPD)

WPDES Permit No. WI-S049921-04 (9/1/2021 – 8/31/2026)



Prepared for:

Southeast Wisconsin Professional Baseball Park District (SEWPBPD)

1 Brewers Way

Milwaukee, Wisconsin 53214

414.902.4045 | contact@wibaseballdistrict.com

Prepared by:



7711 N. Port Washington Road

Milwaukee, WI 53217

877.715.0088

CONSTRUCTION SITE POLLUTION CONTROL

Permit No. WI-S049921-04

Section II. D. 1, 2,3, and 4

BACKGROUND

The Southeast Wisconsin Professional Baseball Park District (hereto referred to as SEWPBPD or District) is the owner and operator of a municipal separate storm sewer system (MS4) and is permitted to discharge stormwater from all portions of the MS4 to Waters of the State in accordance with conditions set forth in WPDES Permit No. WI-S049921-04.

This Construction Site Pollution Control program manual has been developed by the SEWPBPD to address requirements of the WPDES Permit (Section II. D. 1, 2, 3 and 4) below:

D. CONSTRUCTION SITE POLLUTION CONTROL

The permittee shall develop a written program describing the responsible parties for all construction activities which establishes measurable goals and reduces the discharge of sediment and construction materials from construction sites. The permittee through implementation of this program shall:

1. Complete inspections and enforcement following Wisconsin Construction Site Technical Standards found online at <http://dnr.wi.gov/topic/stormwater/standards/index>.
2. Discuss, communicate with, and require those responsible for the design, installation, and maintenance of construction site erosion control practices and storm water management facilities, including contractors for construction projects on SEWPBPD projects, the proper design, installation and maintenance of practices and facilities in accordance with ch. NR 151 and ch. NR 216, Wisconsin Administrative Code. This includes achieving the requirements for those sites with less than 1 acre of land disturbance per s. NR 151.105, Wis. Adm. Code.
3. Inspection of all land disturbing activities for proper erosion and sediment control weekly and within 24 hours after a rainfall event of 0.5 inch or greater. A "rainfall event" may be considered to be the total amount of rainfall recorded in any continuous 24-hour period. Inspection records must be kept onsite. A model inspection report is available online at <http://dnr.wi.gov/topic/stormwater/construction/forms.html>
4. Repair or replacement of erosion and sediment control BMPs must be completed as necessary within 24 hours of an inspection or notification indicating that repair or replacement is needed. Any changes made shall be noted in the inspection records.

OVERSIGHT, IMPLEMENTATION & INSPECTION RECORDS

The SEWPBPD's Construction Site Pollution Control program manual is overseen by the District's Executive Director. Other District staff, Milwaukee Brewers Baseball Club staff, SEWPBPD consultants, and/or project contractors will play a role in ensuring compliance with construction site pollution control. This manual describes how the District intends to comply with Construction Site Pollution Control.

The SEWPBPD does not have a construction site pollution control ordinance or means to enforce any actions. The SEWPBPD relies on state regulations for new projects at the ballpark.

RESPONSIBLE PARTIES FOR CONSTRUCTION ACTIVITIES

- 1) Southeast Wisconsin Professional Baseball Park District Projects
 - a. SEWPBPD Executive Director
- 2) Milwaukee Brewer Baseball Club (“MBBC”) Projects
 - a. Vice President – Facilities and Projects

To reduce the discharge of sediment and construction materials from any construction site at American Family Field, the District has set the following measurable goals.

MEASUREABLE GOALS

- All land disturbing activities will be inspected for proper erosion and sediment control weekly and within 24 hours after a rainfall event of 0.5 inch or greater.
- Inspection records will be kept onsite. A copy of an inspection report is included within this program.
- The District and MBBC include the following language in all contracts that include land disturbing construction work on the American Family Field site and discuss this requirement with contractors¹:

Construction Site Pollution Control

Prior to any land disturbance Work commencement, Contractor shall supply an erosion and sediment control plan, details, notes and necessary sequencing plan to the District that Contractor shall implement to comply with the Construction Site Erosion & Sediment Control Standards applicable to the Work. The plan shall outline all necessary DNR approved technical standards related to erosion/sediment control and/or storm water management that the Contractor will implement, maintain, and inspect as required throughout the duration of construction until final restoration (as needed) is achieved. The Contractor shall be responsible for the proper design; and the Contractor shall be responsible for the proper installation, inspection and repair/maintenance of the erosion/sediment control measures and/or storm water management measures and shall document records of inspections (on DNR inspection reports: <http://dnr.wi.gov/topic/stormwater/construction/forms.html>) and records of repair/maintenance activities in daily logs during the Work in accordance with ch. NR 151 and ch. NR 216, Wisconsin Administrative Code. The inspection reports and repair/maintenance logs shall be kept on-site in an accessible location along with the approved erosion and sediment control plan, details, notes and sequencing plan.

¹ The SEWPBPD does not have governing authority to enact ordinances nor enforce regulations (i.e. the District does not have regulatory authority).

Appendix A – Wisconsin DNR Construction Site Inspection Report

Notice: This form was developed in accordance with s. NR 216.48 Wis. Adm. Code for WPDES permittees' convenience; however, use of this specific form is voluntary. Multiple copies of this form may be made to compile the inspection report. Inspections of the construction site and implemented erosion and sediment control best management practices (BMPs) must be performed weekly and within 24 hours after a rainfall event 0.5 inches or greater.

Construction Site Name and Location (Project, Municipality, and County):		Site/Facility ID No. (FIN):
Onsite Contact/Contractor:		Onsite Phone/Cell:
Note: Inspection reports, along with erosion control and storm water management plans, are required to be maintained on site in accordance with s. NR 216.48 (4) and made available upon request. PLEASE PRINT LEGIBLY.		
Date of inspection:	Time of inspection: Start: _____ <input type="radio"/> am <input type="radio"/> pm End: _____ <input type="radio"/> am <input type="radio"/> pm	Type of inspection: <input type="radio"/> Weekly <input type="radio"/> Precipitation Event <input type="radio"/> Other (specify)
Weather/Site Conditions: <input type="radio"/> Dry <input type="radio"/> Frozen or snow covered <input type="radio"/> Antecedent ^\circ F <input type="radio"/> Variable <input type="radio"/> Frozen (Thaw predicted in next week) <input type="radio"/> Soil Moisture <input type="radio"/> Wet <input type="radio"/> Melting Snow/slush Last Rainfall Depth: _____ inches Last Rainfall Date: _____	Describe current phase of construction: Scheduled Final Stabilization Date for Universal Soil Loss Equation (USLE) ¹ : _____ Project on Schedule²? <input type="radio"/> Yes <input type="radio"/> No	
Name(s) of individual(s) performing inspection:		Inspector Phone/Cell:

I certify that the information contained on this form is an accurate assessment of site conditions at the time of inspection:

Inspector Signature _____ **Date:** _____

Inspection Questions:	Yes	No (Identify Actions Required):	Location/Comments:	Actions Completed by Date & Initials
1. Is the erosion control plan accessible to operators?	<input type="checkbox"/>	<input type="checkbox"/> Provide onsite copy		
2. Is the permit certificate posted where visible?	<input type="checkbox"/>	<input type="checkbox"/> Post certificate		
3. Is the current phase of construction on sequence with the site-specific erosion and sediment control plan, including installation/stabilization of ponds and ditches?	<input type="checkbox"/>	<input type="checkbox"/> Add sediment control <input type="checkbox"/> Install missing ditch/pipe/pond <input type="checkbox"/> Stabilize bare soil		
4. Are all erosion and sediment control BMPs shown on plan properly installed and in functional condition?	<input type="checkbox"/>	<input type="checkbox"/> Repair <input type="checkbox"/> Modify <input type="checkbox"/> Install/Replace		
5. Is inlet protection properly installed and functioning in all inlets likely to receive runoff from the site?	<input type="checkbox"/>	<input type="checkbox"/> Clean <input type="checkbox"/> Replace <input type="checkbox"/> Install		
6. Is the air free of fugitive dust resulting from construction activity and bare soil exposure?	<input type="checkbox"/>	<input type="checkbox"/> Apply water <input type="checkbox"/> Apply dust control product		

¹ The Universal Soil Loss Equation (USLE) model and the Construction Site Soil Loss and Sediment Discharge Guidance are available at: http://dnr.wi.gov/topic/stormwater/standards/const_standards.html

² If the project is not on schedule then the soil loss summary for the project should be reviewed and schedule, plan or practices modified accordingly.

Inspection Questions:	Yes	No (Identify Actions Required):	Location/Comments:	Actions Completed by Date & Initials
7. Is the public right of way curb line free of tracked soil and accumulation?	<input type="checkbox"/>	<input type="checkbox"/> Install tracking pad <input type="checkbox"/> Widen/lengthen pad <input type="checkbox"/> Amend stone/Add geotextile <input type="checkbox"/> Install wheel washing station <input type="checkbox"/> Close entrance/exit <input type="checkbox"/> Limit traffic across disturbed areas <input type="checkbox"/> Sweep road and curb line		
8. Are wetlands, lakes, streams, ditches, or storm sewers downstream of the site free of sedimentation and turbid water leaving the site? ³	<input type="checkbox"/>	<input type="checkbox"/> Repair/Replace erosion control <input type="checkbox"/> Add sediment controls <input type="checkbox"/> Modify operations <input type="checkbox"/> Contact DNR to verify extent of cleanup required		
9. Is dewatering and/or vehicle and equipment washing being done in a manner that prevents erosion and sediment discharge?	<input type="checkbox"/>	<input type="checkbox"/> Install treatment train <input type="checkbox"/> Install energy dissipation <input type="checkbox"/> Modify discharge location <input type="checkbox"/> Modify intake to reduce sediment		
10. Are soil stockpiles existing for more than 7 days covered and stabilized?	<input type="checkbox"/>	<input type="checkbox"/> Seed <input type="checkbox"/> Install mat/mulch/polymer <input type="checkbox"/> Cover with tarp/plastic sheeting		
11. Are downstream channels and other downhill areas protected from scour and erosion?	<input type="checkbox"/>	<input type="checkbox"/> Install energy dissipation at outfall <input type="checkbox"/> Install ditch checks <input type="checkbox"/> Install slope interruption <input type="checkbox"/> Install onsite detention		
12. Are good housekeeping practices or treatment controls in place to prevent the discharge of chemicals, cement, trash, and other materials into wetlands, waterways, storm sewers, ditches, or drainage-ways? ⁴	<input type="checkbox"/>	<input type="checkbox"/> Properly dispose of trash <input type="checkbox"/> Provide concrete washout station <input type="checkbox"/> Contact DNR to verify extent of cleanup required		
13. Is the plan reflective of current site operations and does it address all erosion and sediment control issues identified during the inspection?	<input type="checkbox"/>	<input type="checkbox"/> Revise sequence <input type="checkbox"/> Revise sediment control BMP <input type="checkbox"/> Revise erosion control BMP <input type="checkbox"/> Revise post-construction storm water BMP		
14. Are all areas where construction has temporarily ceased (and will not resume for more than 2 weeks) temporarily stabilized?	<input type="checkbox"/>	<input type="checkbox"/> Topsoil & seed <input type="checkbox"/> Install mat/mulch/polymer <input type="checkbox"/> Cover with tarp/plastic sheeting		
15. Are all areas at final grade permanently vegetated or stabilized with other treatments?	<input type="checkbox"/>	<input type="checkbox"/> Topsoil & seed <input type="checkbox"/> Install mat/mulch/polymer <input type="checkbox"/> Sod <input type="checkbox"/> Install stone base		

TAB 4

POST-CONSTRUCTION STORM WATER MANAGEMENT (Permit Section II.E.)

**SOUTHEAST WISCONSIN PROFESSIONAL BASEBALL PARK DISTRICT (“SEWPBPD”)
WPDES PERMIT No. WI-S049921-04
Program Manual – Post-Construction Storm Water Management
Last Update: May 2022**



Program Manual

Post-Construction Storm Water Management

Southeast Wisconsin Professional Baseball Park District (SEWPBPD)

WPDES Permit No. WI-S049921-04 (9/1/2021 – 8/31/2026)

Prepared for:

Southeast Wisconsin Professional Baseball Park District (SEWPBPD)

1 Brewers Way
Milwaukee, Wisconsin 53214

414.902.4045 | contact@wibaseballdistrict.com

Prepared by:



7711 N. Port Washington Road
Milwaukee, WI 53217

877.715.0088

POST-CONSTRUCTION STORM WATER MANAGEMENT

INTRODUCTION

The Southeast Wisconsin Professional Baseball Park District (hereto referred to as SEWPBPD or District) is the owner and operator of a municipal separate storm sewer system (MS4) and is permitted to discharge stormwater from all portions of the MS4 to Waters of the State in accordance with conditions set forth in WPDES Permit No. WI-S049921-04.

This Post-Construction Storm Water Management program manual has been developed by the SEWPBPD to address requirements of the WPDES Permit (Section II. E. 1 and 2). The manual describes the system the District uses to ensure that all projects are designed and installed to meet State post-construction performance standards and requirements of the WPDES Permit and to ensure that all new post-construction stormwater best management practices (BMPs) have an accompanying operation and maintenance plan.

The SEWPBPD's Post-Construction Stormwater Management program manual is managed by the District's Executive Director. Other District staff, Milwaukee Brewers Baseball Club staff, and SEWPBPD consultants will play a role in ensuring compliance with post-construction stormwater requirements. This manual describes how the District intends to comply with Post-Construction Stormwater Management.

Permit No. WI-S049921-04

Section II.E.1

POST CONSTRUCTION STORM WATER MANAGEMENT PROGRAM

The SEWPBPD does not have a post-construction storm water management ordinance. The SEWPBPD relies on the state and MMSD regulations for new projects at the ballpark. As it relates, the language below is included in the SEWPBPD's contracts with contractors¹:

Construction Site Pollution Control

Prior to any land disturbance Work commencement, Contractor shall supply an erosion and sediment control plan, details, notes and necessary sequencing plan to the District that Contractor shall implement to comply with the Construction Site Erosion & Sediment Control Standards applicable to the Work. The plan shall outline all necessary DNR approved technical standards related to erosion/sediment control and/or storm water management that the Contractor will implement, maintain, and inspect as required throughout the duration of construction until final restoration (as needed) is achieved. The Contractor shall be responsible for the proper design; and the Contractor shall be responsible for the proper installation, inspection and repair/maintenance of the erosion/sediment control measures and/or storm water management measures and shall document records of inspections (on DNR inspection reports: <http://dnr.wi.gov/topic/stormwater/construction/forms.html>) and records of repair/maintenance activities in daily logs during the Work in accordance with ch. NR 151 and ch.

¹ The SEWPBPD does not have governing authority to enact ordinances nor enforce regulations (i.e. the District does not have regulatory authority).

NR 216, Wisconsin Administrative Code. The inspection reports and repair/maintenance logs shall be kept on-site in an accessible location along with the approved erosion and sediment control plan, details, notes and sequencing plan.

The storm water plan includes many BMPs, including one pond owned and operated by the SEWPBPD which treats storm water before discharging into public waterways. The pond is visually inspected on a quarterly basis to help ensure proper performance. Sediment depth of the pond shall be analyzed at a minimum frequency of once every five years as of calendar year 2022, per the WPDES permit. Any deficiencies noted during inspection or sediment survey shall be addressed.

Permit No. WI-S049921-04

Section II.E.2

NEW POST CONSTRUCTION STORMWATER BMPS

The SEWPBPD will ensure that all new post-construction BMPs will meet the post-construction standards in NR 216.07(5). An architect or engineer will review any plans for a new BMP. The plans will be checked for compliance with state and local standards. A new or updated operations and maintenance plan will be created for any new stormwater facility.

TAB 5

POLLUTION PREVENTION (Permit Section II.F.)

SOUTHEAST WISCONSIN PROFESSIONAL BASEBALL PARK DISTRICT
WPDES Permit No. WI-S049921-04
Pollution Prevent Program
Last Updated: May 2022

POLLUTION PREVENTION PROGRAM

Permit No. WI-S049921-04
Section II. F.

The Southeast Wisconsin Professional Baseball Park District (SEWPBPD or District) shall develop and implement a written pollution prevention program and establish measurable goals for pollution prevention. The following items will be completed or followed as part of the pollution prevention program.

1. Continue to inspect and maintain structural storm water management facilities owned and operated by the District in an effort to maintain their pollutant removal operating efficiency.
2. Inspect the stormwater detention pond on a quarterly basis (inspection form attached).
3. The stormwater detention pond sediment depth evaluation shall be conducted at a minimum frequency of once every five years beginning the 2nd year of the permit term (calendar year 2022). Results of the evaluation must be documented in a report and submitted to the Department. Any maintenance activities involving the removal of accumulated sediment shall follow Ch. NR 528, Wis. Adm. Code requirements.
4. Maintain ground cover and remove any cut material to ensure maximum effectiveness of storm water management facilities, including removal of woody brush or trees. Invasive species shall be controlled to encourage establishment of native species consistent with the surrounding planting plan.
5. Inspect catch basins annually and clean out when greater than 45% full.
6. Implemented a tracking system to document the date of each catch basin inspection, the sediment depth in each catch basin, and date of clean out.
7. Street sweeping will be performed as outlined in the attached **Street Sweeping Plan**.
8. Material collected through street sweeping and catch basin cleaning shall be handled and stored in a manner that prevents contamination of storm water runoff and shall be disposed of or beneficially reused in accordance with applicable solid and hazardous waste statutes and administrative codes.
9. Trash and recycling receptacles will be handled as outlined in the attached **Trash and Recycling Receptacle Plan**.
10. Restrooms will be handled as outlined in the attached **Restroom Plan**.
11. In an effort to minimize overapplication, road salt or other deicers shall be applied and stored as outlined in the attached **Salt Application and Storage Plan**. No more shall be applied than the amount necessary to maintain public safety and salt storage shall be in a manner consistent with State, Local, and Federal regulations.
12. The District will track the usage of pesticides, herbicides, and fertilizers on lawn and garden areas. Turf management on areas of 5 acres or more shall be completed in accordance with a nutrient management plan based upon appropriate soil tests.
13. Appropriate District and Milwaukee Brewers Baseball Club (Team) representatives shall be made aware of the District's and the general WPDES permits and requirements. The District and Team

shall meet on a monthly basis to discuss, as necessary, requirements of the WPDES permit. A list of the general WPDES permits and requirements can be found at the following website: <https://dnr.wisconsin.gov/topic/Wastewater/Permits.html>.

14. The Lot 13 Storm Water Pollution Prevention Plan (SWPPP) shall be followed and updated when site conditions or operations change. Appropriate District and Team staff shall be annually trained on the SWPPP.

The District has established the following measures and associated measurable goals for pollution prevention.

- Continued inspection and maintenance of detention pond
- Inspecting catch basins and cleaning as needed
- Conducting regular street sweeping
- Disposal of material from street sweeping and catch basin cleaning to prevent storm water contamination
- Monthly review of trash and recycling receptacle availability and adjust as needed
- Monthly review of parking lot restroom availability
- Salt storage and application protocols
- Tracking the use of pesticides, herbicides and fertilizers
- Staff Education and Training
- Implementation of Storm Water Pollution Prevention Plan (SWPPP) for Lot 13

Summary of Pollution Prevention measurable goals:

Pollution Prevention Element	Measurable Goal
Inspect detention pond	Inspect quarterly
Evaluate detention pond sediment depth and produce/submit report to WDNR	Evaluate every 5 years beginning in 2022
Evaluate detention pond ground cover and presence of woody brush or trees, invasive species	Evaluate annually
Inspect catch basins	Inspect annually
Clean out catch basins	When greater than 45% full
Conduct street sweeping of roads and parking lots	After each event
Conduct street sweeping of roads	At least monthly when no events occur
Review/evaluate the availability of trash & recycling receptacles	Review monthly and adjust as needed
Review/evaluate the availability of restrooms in parking lots	Review monthly and adjust as needed
Calibrate salt application equipment	Annually

Conduct Lot 13 inspections	<ol style="list-style-type: none"> 1. Visual storm water run-off inspections – quarterly 2. Annual facility Site Compliance Inspection (AFSCI)
Provide staff training on the SWPPP for Lot 13	Annually
Review the Storm Water Management Program/Manual for adequacy	Annually

POND INSPECTION FORM

Quarterly Pond Inspection Form

WPDES Permit No. WI-S049921-04 (effective 9/1/2021)

Inspection form effective date: August 1, 2022

Date:	Inspector(s) Name(s):
Time:	Inspector(s) Titles:
Weather: °F,	Inspector(s) Phone Number(s):

Visual Observations

- **Pond Banks:**
 - **Date of most recent mowing/trimming along pond banks (if available from SEWPBPD):**
- **Pond Outfall:**
- **Pond Inlets:**
- **Pond Discharge (Menomonee River):**
- **Pollutants to Pond (hi-lite)?:** Discoloration Odor Sheen Algae Litter

Other

- **Date of most recent sediment depth (survey) analysis:**
- **Maintenance recommendations (and note any actions taken from prior inspection(s) maintenance recommendations):**



STREET SWEEPING PLAN

STREET SWEEPING PLAN

The following plan will be followed for Major League Baseball (MLB) Events (defined as a homestand) and Stadium Events (defined as an event at the stadium with at least 10,000 people in attendance):

- a) *Housekeeping Vendor* will hand pick parking lots and roadways at the conclusion of each game day or Stadium Event as required.
- b) *Parking Vendor* will hand pick parking lots and roadways as needed prior to opening lots for each game day or Stadium Event.
- c) *Grounds Department* will hand pick landscaped areas as needed at the conclusion of and on an as needed basis during MLB Events and Stadium Events.
- d) *Sweeping Vendor* will sweep parking lots and roadways where needed at least once per MLB Event and Stadium Event. Need will be based upon use of parking lots during the event and visual observation.
 - *Sweeping Vendor* will dispose of contents in designated area (Lot 13).
 - *Housekeeping Vendor* will dispose of collected material in the appropriate dumpster within 48 hours of an MLB Event or Stadium Event.

Sweeping needs will be reviewed by *Grounds Department* on roads and parking lots monthly from November – March. Sweeping will occur as needed.

Sweeping shall occur a minimum of once per month during periods of no snow cover.

Sweeping Plan will be evaluated by *Event Service Personnel* annually for adequacy. The review will include visual observation and any feedback from event staff.

RECORD OF STREET SWEEPING NEEDS REVIEW

Frequency (Monthly during off-season: November - March)	Date of Review	Reviewer(s)
November 2022		
December 2022		
January 2023		
February 2023		
March 2023		
November 2023		
December 2023		
January 2024		
February 2024		
March 2024		
November 2024		
December 2024		
January 2025		
February 2025		
March 2025		
November 2025		
December 2025		
January 2026		
February 2026		
March 2026		
November 2026		
December 2026		

RECORD OF STREET SWEEPING PLAN REVIEW

Frequency (Annually)	Date of Review	Reviewer(s)
2022		
2023		
2024		
2025		
2026		
2027		
2028		
2029		
2030		

TRASH AND RECYCLING RECEPTACLE PLAN

SOUTHEAST WISCONSIN PROFESSIONAL BASEBALL PARK DISTRICT
WPDES Permit No. WI-S049921-04
Trash and Recycling Receptacle Plan
Last Updated: May 2022

TRASH AND RECYCLING RECEPTACLE PLAN

The following plan will be followed for MLB Events (defined as a homestand) and Stadium Events (defined as an event at the stadium with at least 10,000 people in attendance):

- a) *Housekeeping Vendor* will empty plaza and sidewalk garbage and recycling cans during game days and Stadium Events continually throughout and at the conclusion of each MLB Event and Stadium Event.
- b) *Waste Removal Vendor* will check all garbage and recycling dumpsters at the conclusion of each MLB Event and Stadium Event. Dumpsters will be emptied as needed.

Event Service Personnel will evaluate the adequacy of parking lot trash and recycling receptacles monthly (on a day with a minimum attendance of 20,000) and generate a summary report. Adjustments to receptacle quantity and placement will be made based on this evaluation. One report per month from April – October will be submitted with the biennial report.

RECORD OF PARKING LOT TRASH AND RECYCLING RECEPTACLE NEEDS REVIEW

Frequency (Monthly during season: April – October)	Date of Review	Reviewer(s)	Summary Report Submitted?
April 2022			
May 2022			
June 2022			
July 2022			
August 2022			
September 2022			
October 2022			
April 2023			
May 2023			
June 2023			
July 2023			
August 2023			
September 2023			
October 2023			

RESTROOM PLAN

RESTROOM PLAN

The following plan will be followed for Major League Baseball (MLB) Events (defined as a homestand) and Stadium Events (defined as an event at the stadium with at least 10,000 people in attendance):

- a) *(54) Permanent Water Closets* are available in the parking lots from March – November.
- b) *(24) Permanent Urinals* are available in the parking lots from March – November.
- c) *Housekeeping Vendor* will clean and empty garbage in the permanent parking lot restroom facilities at the conclusion of each game day.
- d) *(73) Portable Restrooms* are placed in the parking lots for all MLB Events regardless of anticipated attendance.
 - These portable units combined with our permanent parking lot restrooms exceed the Portable Sanitation Association International recommendation for number of units for a Special Event. See attached chart (assumes parking lots open 3 hours prior to the game, 10,000 cars parked, 3.5 people/car).
- e) *(31) Additional Portable Restrooms* are placed on Opening Day.
- f) *Portable Restroom Vendor* services the units at the conclusion of each baseball game or Stadium Event.
- g) *Parking Lot Security and Milwaukee Police Department* monitor lots during events. Citations are given for public urination.

Event Service Personnel will evaluate the adequacy of parking lot restrooms monthly (on a day with a minimum attendance of 20,000) and generate a summary report. Adjustment to portable unit quantity and placement will be made based on this evaluation. One report per month from April – October will be submitted with the biennial report.

RECORD OF RESTROOM NEEDS REVIEW

Frequency (Monthly during season: April – October)	Date of Review	Reviewer(s)	Summary Report Submitted?
April 2022			
May 2022			
June 2022			
July 2022			
August 2022			
September 2022			
October 2022			
April 2023			
May 2023			
June 2023			
July 2023			
August 2023			
September 2023			
October 2023			

SALT APPLICATION AND STORAGE PLAN

SALT APPLICATION AND STORAGE PLAN

SALT APPLICATION STRATEGY

The goal of this salt application strategy is to clearly define the amount, type and location of deicers used to ensure that no more than the amount necessary is applied to maintain public safety. As part of the salt application strategy, the following will be completed.

- All salt application equipment shall be calibrated annually. The calibration will document the type of equipment, the equipment settings, tire pressure and the date of calibration.
- All contractors that apply deicers at the site shall provide proof of annual equipment calibration.
- Salt storage will be in a manner consistent with State, Local, and Federal regulations.

Before applying any deicing agents, the surface will be cleared of as much snow and ice as possible by mechanical means. Mechanical means of removal is the preferred method.

Pavement temperature will be monitored using infrared thermometers and the appropriate amount of deicer will be applied to achieve safe conditions following the Wisconsin Department of Transportation guidelines summarized below. Visual observation and judgement will also be used when necessary to determine if conditions are safe.

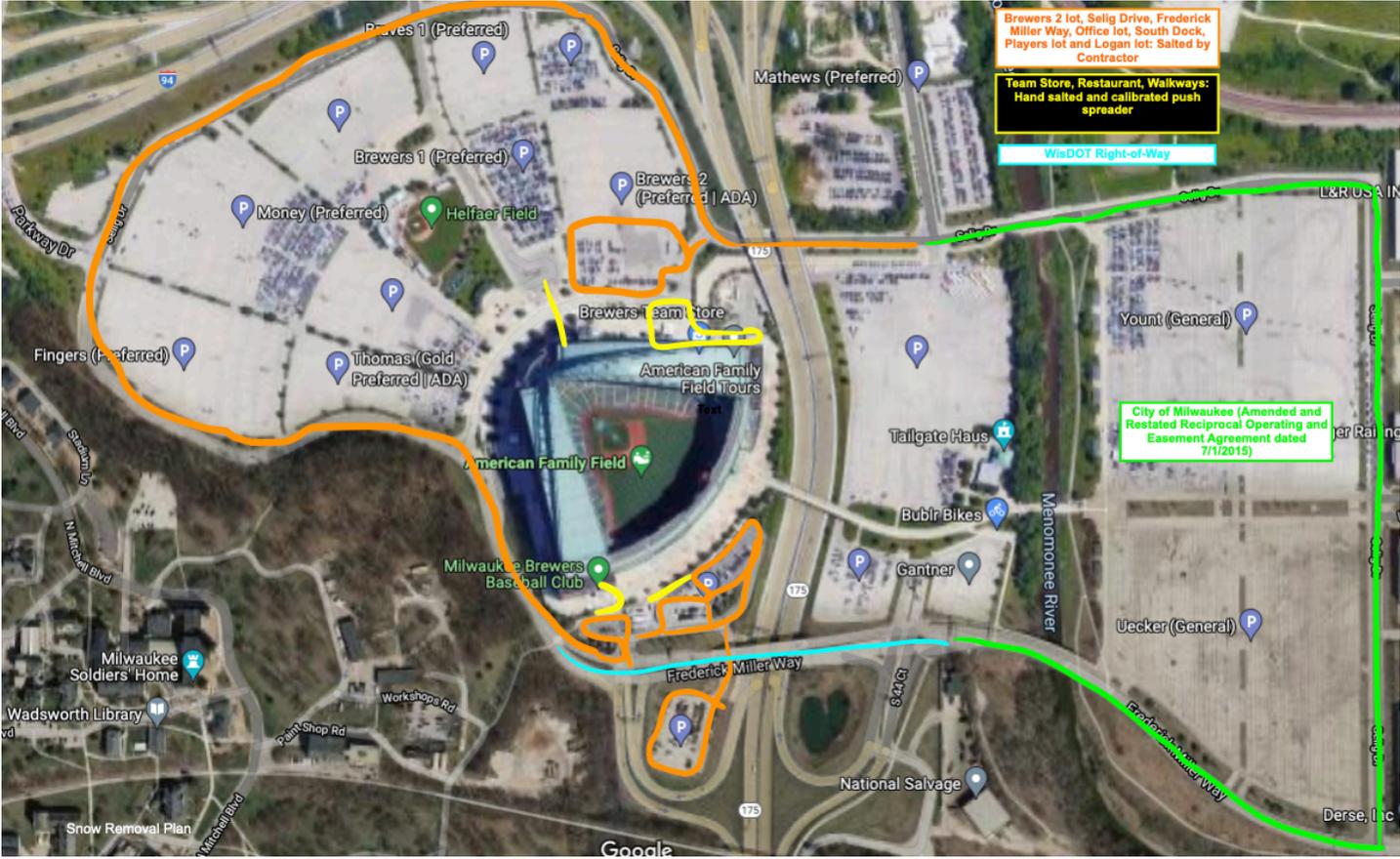
Pavement Temperature	Deicer	Amount (lbs. per linear mile)
28°F – 32°F	sodium chloride	100
23°F – 28°F	sodium chloride	100-150
15°F – 23°F	calcium chloride & magnesium chloride	200
< 15°F	calcium chloride & magnesium chloride	300

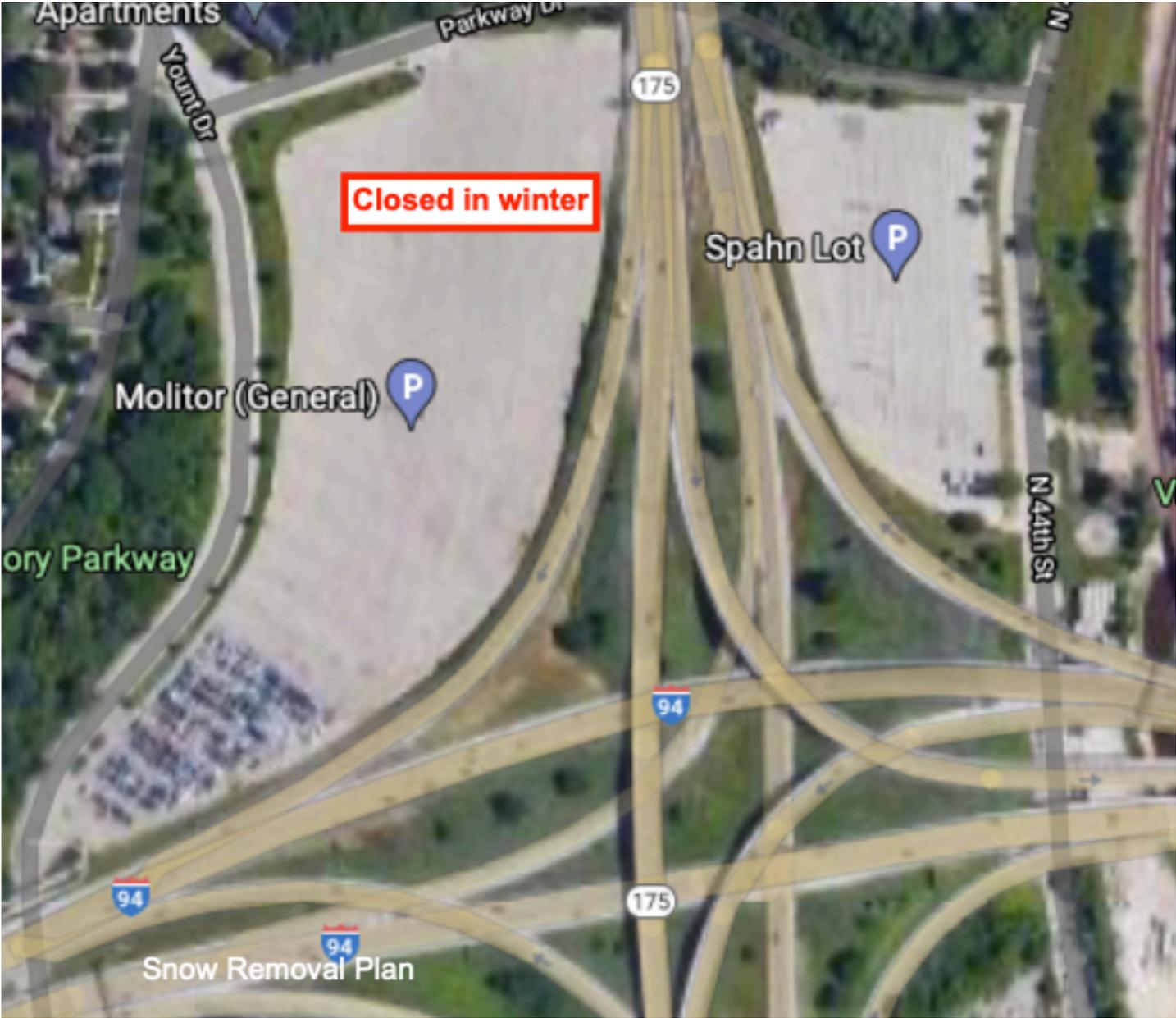
A map depicting the areas where snow is to be removed (or deiced) is attached as Appendix A. Certain circumstances (e.g., special events) may require application beyond the areas on the map. If that happens, the Wisconsin Department of Transportation guidelines above shall be followed.

SALT STORAGE

- Salt will be brought in from distributor when needed.
- A maximum of 2.5 tons of sidewalk salt (MgCl₂, CaCl₂, NaCl) will be stored on pallets onsite. The products are stored in 50 lb. bags with 40 bags per pallet and are stored inside in the grounds shop. All salt is stored separate from other chemicals.
- Once the snow and ice season is over, any residual deicers from the season are moved and stored inside in an isolated location of the grounds shop.

Appendix A – Map of Areas for Snow Removal





TAB 6

STORM WATER QUALITY MANAGEMENT (Permit Section II.G.)

One of the objectives of the SWMP is to control the discharge of total suspended solids to waters of the state through the implementation of best management practices to achieve/maintain a total suspended solids reduction of more than 20 percent compared to no controls.

SLAMM modeling conducted in 1999 and 2002 and again in 2008 demonstrates that the drainage controls implemented remove approximately 38% of the TSS and 47% of the total phosphorus generated, exceeding the 20% TSS removal rate required by NR 151 and the WPDES permit.

TAB 7

STORM SEWER SYSTEM MAP (Permit Section II.H.)

The SEWPBPD will maintain a current storm sewer system map including the elements as listed in the permit. The map will be reviewed periodically and will be updated as needed. A copy of the current version of the map is included under Tab 7.

