

# **OUTLINE OF STORMWATER MANAGEMENT PLAN FOR LIBERTY, MO 2026-2031**

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

**4.1.A Target audiences:** Residents and Businesses.

**4.1.B Target pollutants:** The City does not have any specific pollutants of concern. In any given year, public education programs will address the most common pollutants found in urban stormwater runoff.

### **4.1.C Outreach and Education BMPs**

1. Stormwater quality information on the City web site
2. Social media posts with stormwater quality information
3. Permanently embossed “No Dumping” message on all new inlets
4. Membership in MARC water quality program
5. Other previously ongoing BMPs as time and resources allow

**4.1.D** The City will create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the Stormwater Management Program. The activities will make an effort to impact stormwater runoff by improving water quality. The City has selected Litter Cleanup events and Ongoing Yard Waste Collection as their public involvement BMPs. The City will also continue to encourage citizens to utilize the metro area Household Hazardous Waste mobile pickup events and permanent drop off locations.

**4.1.E** The City will create or support the involvement BMP(s) in Section 4.1.D.

**4.1.F** The City of Liberty will review their Public Education and Outreach on Stormwater Impacts Program annually and update implementation procedures and/or BMPs as necessary.

## **4.2 MCM 2. Public Participation**

**4.2.A** Public notice for the permit application and SWMP outline was posted on the City web site and at City Hall on January 23, 2026. It was also posted on Facebook.

**4.2.B** Copy of City’s renewal application and program summary was posted on the City website. Public comment was requested.

**4.2.C** Public information meeting will be held on February 23, 2026 as part of a normal City Council meeting held at City Hall. The public notice for this meeting was included with the public notice of the application (see 4.2.A).

**4.2.D** The City tracks public input related to stormwater quality matters in an electronic log kept by the Capital Projects Engineer.

**4.2.E** The City does not have a Stormwater Quality Advisory Committee.

**4.2.F** Staff or the Stormwater Consultant will provide an update to the City Council at least annually on the program status.

**4.2.G/I** The City will annually evaluate their current program to ensure it is in compliance with this permit and promoted to the community.

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

**4.3.A** The City will develop in the first permit year, a storm sewer map showing: accurate location of all MS4 outfalls; names and locations of all receiving waters; and the boundary of the regulated MS4 area (City limits). An existing outfall map is being edited based on recent outfall definition clarifications.

**4.3.B** The City will develop this map based on existing records and field reconnaissance as necessary. Whenever outfall locations are verified or surveyed, the date will be recorded. Newly added outfalls will include the date that they were added to the system.

**4.3.C** The City has an ordinance that effectively prohibits non-stormwater discharges into the storm sewer system and has implemented appropriate enforcement procedures and actions. The ordinance will be reviewed and updated, if needed, in the first permit year.

- 4.3.D** Dry weather field screening - The City will conduct outfall field assessments during dry weather conditions to check for the presence of illicit discharges using an established checklist/form (electronic). A minimum of 60% of all outfalls will be screened during the permit cycle. Priority areas will be established in the first year and screened each year.
- 4.3.E** The City will develop diagnostic monitoring procedures to detect and investigate unknown non-stormwater flows as part of the dry weather screening program. These procedures will test parameters as necessary to determine the nature of any illicit discharges discovered during dry weather field screening.
- 4.3.F** The City has procedures for tracing the source of an illicit discharge. If initial screening indicates that a dry weather discharge contains pollutants, or if an illicit discharge is suspected from another reporting method, the source will be traced. A variety of investigative tools may be used as appropriate for each situation.
- 4.3.G** The City maintains procedures for removing the source of the discharge. After locating the source, the pollutant and source will be removed following these procedures. The City works with the sources of the illicit discharges to remedy the situation with the implementation of source control or treatment BMPs to prevent reoccurrence of the violation as well as remediation or restoration of affected property.
- 4.3.H** In order to prevent further illicit discharge, the City will identify priority areas such as: areas with evidence of ongoing illicit discharges. Annually, the City will evaluate this priority area list and/or map and update as necessary to reflect changing priorities.
- 4.3.I** The City will maintain written procedures for implementing the IDDE Program, including those components described within this section, to ensure program continuity and consistency.
- 4.3.J** The City will conduct investigations in response to field screening discoveries, spills, or in response to complaints from the public, municipal staff, or adjacent MS4s. This investigation will work to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.
- 4.3.K** The City has procedures for appropriate enforcement outlined in both the ordinance and the Enforcement Response Plan.
- 4.3.L** The City will track its dry weather field screenings, spills, incidents, and investigations. This data will be used to continuously evaluate the effectiveness of the IDDE program. The City will document all investigations and will record and report annually on these investigations.
- 4.3.M** The City will inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- 4.3.N/O** The City will review their IDDE Program annually, update implementation procedures as necessary and evaluate their current program to ensure that it is in compliance with their permit.
- 4.3.Q** The City will maintain a training program for all municipal field staff, who, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system.
- 4.3.R** Using adaptive management, the City will review their IDDE Program annually and update implementation procedures as necessary.

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

- 4.4.A** The City has an ordinance to require construction site runoff control BMPs at construction/land disturbance sites greater than or equal to one (1) acre or less than one acre if the construction activity is part of a larger common plan or development or sale that would disturb one acre or more.
- 4.4.B** The City will review pre-construction plans. These reviews will incorporate the consideration of potential water quality impacts. The plan reviewer will use a checklist to ensure consistency and completeness of each review.
- 4.4.C** The City has established authority for site inspections and enforcement of control measures. They have implemented procedures for inspecting construction/land disturbance projects.
- 4.4.D** The construction site runoff control program includes established, escalating enforcement policies that clearly describe the action to be taken for violations. The written procedures to ensure compliance with the construction site runoff control ordinance are outlined in the ordinance.

- 4.4.E The City will require the construction site operator to conduct inspections. The City will verify that these inspections are being conducted by the construction site operator during City inspections.
- 4.4.F The City will maintain an inventory of applicable active public and private land disturbance sites.
- 4.4.G The City will track their oversight inspections. This will be done by retaining copies of records such as inspection checklists and email correspondence.
- 4.4.H The City will review the construction site runoff control ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures to ensure compliance with the permit. Any changes necessary will be completed within the first year of the permit.
- 4.4.J The Stormwater Management Program includes procedures for the City to receive and consider information submitted by the public about land disturbance sites.
- 4.4.K The City will provide construction site runoff control training for inspectors and plan reviewers at minimum once during this permit cycle.
- 4.4.L The City has provided written procedures for inspection and enforcement to their inspectors to ensure consistency among the inspections.
- 4.4.M Using adaptive management, the Construction Site Stormwater Runoff Control Program will be evaluated annually. The ordinances, review procedures, inspection procedures, enforcement procedures, receipt of public information procedures, and effectiveness of training procedures to ensure compliance with these requirements will be reviewed in order to determine if changes are needed.

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

- 4.5.A The City maintains and utilizes ordinances to address post-construction runoff from new development and redevelopment projects to the extent allowable under state or local law for sites equal to or greater than one acre including projects less than one acre that are part of a larger common plan of development or sale. These ordinances work to protect sensitive areas, minimize the creation of stormwater pollution, utilize BMPs that effectively remove stormwater pollution, and attempt to maintain predevelopment runoff conditions.
- 4.5.B The City has developed a strategy to minimize water quality impacts. This includes a combination of structural and/or non-structural controls (BMPs) appropriate for the community. The ordinance for structural post-construction controls includes technical performance and design standards to control post-construction stormwater discharges. Non-structural controls include stream buffers, preservation of open spaces, tree preservation, impervious cover reduction, land use planning, and low impact development.
- 4.5.C Pre-construction plan review is conducted by the Stormwater Consultant to assess site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance. The structural or non-structural controls chosen are required to protect sensitive areas, minimize the creation of stormwater pollution, and effectively reduce stormwater pollution. The plan review process uses a checklist.
- 4.5.D The City has ordinances to ensure adequate long-term operation and maintenance (O&M) of the selected BMPs, including maintenance agreements between the City and the post-development landowners. Long term O&M is addressed during the plan review and approval process.
- 4.5.E The City will inspect each water quality structural and non-structural post-construction stormwater BMP.
- 4.5.F The City maintains a plan designed to ensure compliance with the MS4's post-construction water quality ordinance. This includes escalating enforcement mechanisms used to ensure compliance. The City has the authority to initiate a range of enforcement actions to address the variability and severity of noncompliance.
- 4.5.G Enforcement actions are timely in order to ensure the actions are effective. The City will begin enforcement actions within thirty (30) days of discovering a violation.
- 4.5.H The City maintains an inventory tracking the water quality post-construction BMPs (in GIS).
- 4.5.I The City tracks the post-construction BMP inspections (in custom GIS application).

- 4.5.J** The City will evaluate the ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures to ensure compliance with the post-construction stormwater management requirements and determine if changes are needed.
- 4.5.L** The City will provide appropriate training for MS4 inspectors at minimum once every permit cycle.
- 4.5 M** Using adaptive management, the City will annually review their Post-Construction Site Stormwater Management in New Development and Redevelopment Program and evaluate effectiveness of the overall program and determine if changes are needed.
- 4.6. MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations**
- 4.6.A** The City maintains and utilizes an employee training program for MS4 municipal operations staff. The training is given annually to all staff who work with material handling, City owned or operated vehicle/equipment maintenance areas, storage yards, and material storage facilities.
- 4.6.B** Employee training is used to prevent and reduce stormwater pollution. The training will cover the following topics/ activities: Vehicle and equipment washing; Fluid disposal and spills; Fleet, equipment, and building maintenance; Park and open space maintenance procedures (including fertilizer, herbicide, pesticide application); New construction, road maintenance, and land disturbances; Stormwater system maintenance; MS4 operated salt and de-icing operations; Fueling; Solid waste disposal; Street sweeper operations; and Illicit Discharges.
- 4.6.C** The City maintains educational materials to use in the Good Housekeeping training program.
- 4.6.D** The City has a list of locations of all municipal operations/facilities.
- 4.6.E** The City has an industrial facility that it owns / operates which is subject to NPDES permits for discharges of stormwater associated with industrial activity: the wastewater treatment plant (MO-0137111).
- 4.6.F** The City maintains controls for reducing or eliminating the discharge of floatables and pollutants from municipal facilities.
- 4.6.G** The City has standard operating procedures for proper disposal of waste removed from the MS4 structures and areas of jurisdiction.
- 4.6.H** The City maintains and utilizes procedures for the washing of all municipal vehicles and equipment
- 4.6.I** The City maintains written explanation of the controls, procedures, inspection schedules, and explanation of tracking of these controls. Annually, the City of Liberty will evaluate the results, controls, and inspection procedures to ensure compliance.
- 4.6.J** The City maintains procedures to determine if there are impacts to water quality for new flood management projects.
- 4.6.K** The City will evaluate the current Good Housekeeping program including training, inspection procedures, and other municipal operation procedures to ensure compliance with the permit.
- 4.6.M** Using adaptive management, the City will review their Municipal Operations Program annually and update implementation procedures as necessary.