

Town of Cottage Grove
Municipal Separate Storm Sewer System (MS4)
Comments for 2009 Annual Report and general permit compliance

12/1/2010

Review by: Laura Bub – WDNR

1. Education and Outreach:

- In future annual reports please include copies of storm water-related newsletter articles that are sent to the public.

2. Illicit Discharge Detection & Elimination:

- The ordinance language in town ordinance chapter 16.02 (e-g) that is intended to cover illicit discharges does not adequately prohibit the discharge, spilling or dumping of non-storm water substances in waters of the state or the MS4. The language is too specific and seems to refer only to motor vehicle fluids, swimming pool discharges and trash. Additionally, non-storm water discharges that are allowed are not identified, and I don't see where the ordinance establishes the authority to inspect and enforce for illicit discharge issue. Please revise the ordinance language to meet the intent of permit section 2.3.1.
- The Illicit Discharge response procedures (permit section 2.3.4) have not yet been received from the town. These procedures were due November 2008. Please submit this document with the next annual report.
- The annual report states that dry weather screening of Town outfalls was completed. In future reports, please submit documentation of the inspections.
- We should discuss your proposal to eliminate ongoing screening of outfalls due to past negative finding. The permit requires an ongoing screening program.

3. Pollution Prevention Program: A formal program (permit section 2.6) has not yet been submitted. This program was due November 2008. Please submit this document with the next annual report.