

# Part 1 - Facility Information

## 1.A. GENERAL INFORMATION:

**NPDES #:** MOR04C025  
**Facility Name:** Neosho Phase II MS4  
**Facility Mailing Address:** 203 E. Main Street, Neosho, MO 64850

**Owner's Name:** City of Neosho, Missouri  
**Owner's Physical Address:** 203 E. Main Street, Neosho, MO 64850  
**Owner's Mailing Address:** 203 E. Main Street, Neosho, MO 64850

**Primary Contact:** Adam Worster, Interim Development Services Director \*  
**Phone Number:** 417-451-8083  
**Email:** aworster@neoshomo.gov

**Secondary Contact:** Matt Brown, Building Inspector \*  
**Phone Number:** 417-451-8050  
**Email:** mbrown@neoshomo.gov

**Facility Region:** Southwest Region  
(Main Office in Springfield, Satellite Office in Neosho)

**Facility County:** Newton County, MO

**Facility Type:** Small MS4  
**Facility SIC Code:** 9511  
**Facility NAICS Code:** 924110  
**Facility Description:** Discharges from Regulated Small MS4  
**Total MS4 Area (acres):** 15.9 sq. miles

\* If name of Contact changes, that information may be updated on the next Stormwater Management Program Report and/or via email to the Department at [MS4@dnr.mo.gov](mailto:MS4@dnr.mo.gov).

## 1.B. ADJACENT WATERWAYS:

The permittee discharges to three permanently flowing streams (Class P), Buffalo Creek, Hickory Creek, and Shoal Creek.

The permittee is not within 100 feet of waters classified as public drinking water supply lakes (L1) or major reservoirs (L2).

The permittee does not discharge to any Wild and Scenic Riverways, Outstanding State Resource Waters, or streams designated for cold-water habitat. Therefore, the permittee is implementing no additional specific provisions for their continued integrity

The permittee does not discharge within two stream miles upstream of any biocriteria reference locations as defined in 10 CSR 20-7.031.

The permittee discharges directly to two stream sections that are listed as Impaired on the 303(d) list, Hickory Creek (3226) and Shoal Creek (3222). There are no Approved TMDLs for these two streams. Approximately 4.7 miles downstream of the city limits, there is an impaired section (303(d) listed) of Buffalo Creek (3273) for which there is a TMDL (dated 2004). The MS4 has not been assigned a Wasteload Allocation (WLA). See Table 1.B below for more details.

Some of the Permittee's areas are defined as wetlands in the National Wetlands Inventory.

Table 1.B. 303(d) Listed Streams

WBID	Waterbody	Year Listed	WB Class	Pollutant	Pollutant Source	TMDL WLA Assigned
3273	Buffalo Cr.	2012	P	Fishes Bioassessments/ Unknown	Unknown	TMDL for Nutrients, 2004. No WLA
3226	Hickory Cr.	2006	P	Escherichia coli (W)	Rural NPS	n/a
3222	Shoal Cr.	2014	P	Zinc (S)	Mill Tailings	n/a
3222	Shoal Cr.	2008	P	Escherichia Coli (W)	Nonpoint Source	n/a

Waterbody Classification: P = Perennial Stream; C = Intermittently Flowing Stream

Pollutant: (W) = Pollutant is in water; (S) = Pollutant is in sediment

1.C. CRITICAL AREAS:

There are threatened or endangered species in the area. (See table below.) The Permittee has met eligibility criteria for protection of threatened or endangered species.

There are critical habitats in the area. (See table below.) The Permittee has met eligibility criteria for protection of critical habitats.

There are multiple historic properties in the area that are listed in the National Register of Historic Places.

Table 1.C. Endangered Species/Critical Habitats

County	Species	Status	Habitat
<i>Mammals</i>			
Newton	Gray Bat <i>Myotis grisescens</i>	Endangered	Caves
Newton	Indiana Bat <i>Myotis sodalist</i>	Endangered	Caves
Newton	Northern Long-Eared Bat <i>Myotis septentrionalis</i>	Threatened	Caves
<i>Fish</i>			
Newton	Ozark Cavefish <i>Ablyopsis rosae</i>	Threatened	Caves in the Boone & Burlington limestone formations of the Ozark Mountains
<i>Clams</i>			
Newton	Neosho Mucket Clam <i>Lampsilis rafinesquena</i>	Endangered	<i>Critical Habitat found in and near the City.</i>
Newton	Rabbitsfoot Clam <i>Quadrula cylindrica clindrica</i>	Threatened	
<i>Insects</i>			
Newton	Monarch Butterfly <i>Danaus plexippus</i>	Candidate	
<i>Plants</i>			
Newton	Mead's Milkweed <i>Asclepias meadii</i>	Threatened	

## Part 2 – Outfalls

A map of Stormwater Outfalls is required under Minimum Control Measure 3. The City's outfalls are mapped in GIS. The mapping is available on the City's GIS website, <https://neoshogis.integritygis.com/H5/Index.html?viewer=neosho#>.

# Part 3 – Stormwater Management Program and Plan

## Background

The Municipal Separate Storm Sewer System (MS4) Permit requires each permittee to develop and implement a Stormwater Management Program. Each permittee creates and maintains a written Stormwater Management Plan (SWMP) for the permit cycle. The SWMP is a document describing the Program and is created to ensure consistency and continuity in the implementation of the Program.

The City of Neosho has chosen to participate in the “Comprehensive” version of the MS4 permit (MO-RO4C000) for the October 2026-September 2031 permit cycle. Neosho is a traditional MS4 with a population of more than 10,000. According to the table below, Neosho fits Group B. All BMPs in this SWMP have been chosen to correspond with the requirements for Group B.

NOTE: Throughout this SWMP document, permit language is denoted in *italics*.

### ***Categories of Regulated Small MS4s under this comprehensive permit.***

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

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

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

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

*The MS4 Operator may replace or modify ineffective BMPs with effective BMPs*

## **Part 4 – Minimum Control Measures**

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

4.1 MCM#1: Public Education and Outreach on Stormwater Impacts

4.2 MCM#2: Public Participation

4.3 MCM#3: Illicit Discharge Detection and Elimination

4.4 MCM#4: Construction Site Stormwater Runoff Control

4.5 MCM#5: Post-Construction Stormwater Management in New Development & Redevelopment

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

NOTE: BMP = Best Management Practice

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

Neosho has implemented a public education and outreach program to distribute educational materials to the community and conduct outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

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

##### **4.1.A Target Audience**

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

As a Group B MS4, the City of Neosho is required to target two audience for the City’s Public Education program. The primary audience will be residents, with construction site operators/builders as the secondary audience.

##### **4.1.B Target Pollutants**

*The MS4 Operator shall target specific pollutant(s) in the permittee’s education program. Each MS4 shall have a minimum of one target pollutant for each target audience from Section 4.1.A of this permit.*

Neosho has chosen target pollutants for each target audience.

Target Audience	Target Pollutant(s)
Residents	Solid waste (trash/litter), household hazardous waste, grass clippings & leaf litter.
Construction Site Operators/Builders	Erosion/sediment from construction activities, solid waste (trash/litter)

##### **4.1.C Best Management Practices (BMPs) for Outreach and Education**

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

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

The City of Neosho, as part of Group B, must choose a minimum of four Outreach and Education BMPs from Table III of the MS4 General.

Neosho has chosen the following Outreach and Education BMPs:

❖ **Stormwater Information on the City Website**

- Continue the Stormwater Information page on the City website to provide educational material and links to further stormwater information.
- Measurable Goals: Maintain the webpage with up-to-date information and working links. All links will be checked, and the page will be updated as necessary at minimum annually. Website will be maintained for the entire permit cycle.
- Tracking and Adaptive Management: The number of hits will be tracked. The City will use this to see which messages get reactions, and if certain messages may need more education.
- Target Audience: Residents, businesses, construction site operators/builders
- Target Pollutants: Include, but are not limited to, solid waste, recycling, and grass clippings & leaf litter.
- Website Addresses: <https://neoshomo.gov/209/Stormwater-Management>
- Responsible Party: Public Information Officer

❖ **Social Media Posts**

- Post Stormwater Information page on the City's Facebook page.
- Measurable Goals: Post a minimum of four (4) times a year. The messages will address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff. Messages will be seasonally appropriate. Posting will be continued for at least one full year.
- Tracking and Adaptive Management: The number of views, impressions, and other interactions will be tracked. The City will use this to see which messages get reactions, and if certain messages may need more education.
- Target Audience: Residents
- Target Pollutants: Include, but are not limited to, grass clippings & leaf litter. Should be seasonally appropriate.
- Website Address: <https://www.facebook.com/City-of-Neosho-1444632892475485/>
- Responsible Party: Public Information Officer

❖ **Billboard**

- Billboard Advertisement. The advertisement will contain seasonally appropriate information about stormwater impacts, practices, and education for the public.
- Measurable Goals: The information will be displayed for 3 weeks.
- Tracking and Adaptive Management: Track the length of time the advertisement is displayed. A QR Code will be present that can be scanned and those numbers will also be tracked.
- Target Pollutants: Include, but are not limited to, grass clippings & leaf litter. Should be seasonally appropriate.
- Responsible Party: Public Information Officer

❖ **Construction Stormwater Education Disseminated with Land Disturbance Permit**

- Targeted education campaign. Educational EPA BMP flier with appropriate information for the type of project.

This will be discussed in detail during the Pre-Construction meeting for each project seeking a permit. This may be done electronically.

- Measurable Goals: An educational EPA land disturbance BMP flier with each Neosho Land Disturbance permit. This may be done electronically.
- Tracking and Adaptive Management: Number of permits/copies sent will be tracked. The city will use compliance with construction site stormwater control requirements to determine effectiveness of this BMP.
- Target Audience: Construction site operators/builders.
- Target Pollutants: Include, but are not limited to, erosion/sediment from construction activities, and solid waste (trash/litter).
- Website Address: The BMP Manual (and the “Stormwater Management Criteria” manual, once adopted) can be found on the City’s Stormwater website: <https://neoshomo.gov/209/Stormwater-Management>
- Responsible Party: Building Inspector

#### **4.1.D Best Management Practices (BMPs) for Involvement**

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

The City of Neosho, as part of Group A, must choose a minimum of two Involvement BMPs from Table IV of the MS4 General Permit.

Neosho has chosen the following Involvement BMP:

##### **❖ Yard Waste Collection/Disposal**

- The City provides curbside yard waste collection each fall.
- Measurable Goals: Curbside pickup service will be provided annually in the fall.
- Tracking and Adaptive Management: Track the amount collected.
- Target Audience: Residents
- Target Pollutants: Grass clippings & leaf litter.
- Responsible Party: Public Works Director

##### **❖ Educational Display/Booth**

- The City will provide at least one information and/or display booth each year at a public event. Booths will work to improve public understanding of issues related to stormwater quality. Public events might include Celebrate Neosho, Fall Festival, and/or business fairs at the schools.
- Measurable Goals: The City will provide one booth or display at minimum annually. The booth must be staffed by City staff at minimum 50% of the time the event is open to the public.
- Tracking and Adaptive Management: The number of hours the booth was staffed and the number of hours of the event will be recorded. The topic(s) covered and the amount of educational materials distributed will also be recorded.
- Target Audience: Residents
- Target Pollutants: Include, but are not limited to, solid waste, grass clippings & leaf litter.
- Responsible Party: Director of Development Services

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

The City of Neosho provides the Yard Waste disposal and Educations Display/Booth BMPs listed in section 4.1.D.

**4.1.F Adaptive Management**

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

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

Annual Review of MCM 1			
Year reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2026	January	Adam Worster	4.1.C BMP changed from utility bills to billboard
2027			
2028			
2029			
2030			

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

Neosho is in the process of implementing a comprehensive public participation program that provides opportunities for public participation in the development and oversight of the City’s Stormwater Program. This program will provide opportunities for public participation in the permittee renewal process and will comply with state and local public notice requirements. Additionally, the program will provide opportunities for public participation in activities related to developing and implementing the Stormwater Management Program.

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

### **4.2.A Public Notice Period**

*At the time of renewal, or issuance of a new permit, the MS4 Operator shall hold a public notice period for a minimum of thirty (30) days to allow the public to review description of the MS4s Stormwater Management Program (this may be the SWMP) prior to the submission of the renewal application to the Department.*

### **4.2.B Items to be Posted on Website**

*As part of the public notice, if the MS4 Operator has a public website, the required items shall be posted on their website with a way to submit comments, along with the standard public notice methods for the MS4.*

- 1. The permittee shall respond to comments received during the comment period.*
- 2. The MS4 Operator shall retain copies of any public comments and records of information submitted by the public received as part of the public notice process. These comments and responses shall be made available to the public or the Department upon request.*

For the 2026-2031 permit cycle, the permit renewal application, public notice, and related information will be posted on the City’s website, <https://neoshomo.gov/209/Stormwater-Management>.

### **4.2.C Public Meeting**

*At the time of renewal, or issuance of a new permit, the MS4 Operator shall hold a public information meeting to provide information on, or describe the contents of, the proposed Stormwater Management Program. This meeting shall be advertised at least thirty (30) days prior to the public meeting.*

- 1. As part of the notice of public meeting, if the MS4 Operator has a public website, the MS4 Operator shall post on that site, along with the standard public notice methods for the MS4. The notice of the public informational meeting, including the date, time and location.*
- 2. The meeting must be held within the service area of the MS4. Co-permittees shall hold the meeting within the boundaries of each co-permittee. Co-permittees may hold one joint meeting to cover all co-permittee service areas.*

Dates of public notice:	Feb 2, 2026 – March 10, 2026
Dates of notice of meeting:	Feb 2, 2026 – March 10, 2026
Date of meeting:	March 17, 2026
Location (or virtual):	City Hall

Assuming the same time periods are required for the 2031-2036 permit cycle, the permit renewal public notice processes should follow this approximate schedule.

Preparation of permit renewal application and supporting documentation:	October -December, 2030
Dates of public notice posting:	Mid January – Late Feb, 2031
Dates of notice of public meeting:	Mid January – Late Feb, 2031
Date of public meeting:	Early March, 2030
Location (or virtual):	City Hall

The public notice for the meeting and documentation will be posted on the City website, the City Facebook page, and through the Notify Neosho text alert system. The public meeting will occur during, or prior to, a regular meeting of the City Council. Dates of posting shall be recorded in the SWMP.

#### **4.2.D Public Comments**

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

Written comments about the stormwater program can be submitted in person, by mail, or by email to the Development Services Director at City Hall ([aworster@neoshomo.gov](mailto:aworster@neoshomo.gov)). Comments may also be submitted through “Report a Concern” section of the City’s website (<https://www.neoshomo.gov/382/Report-a-Concern>). Comments are tracked electronically (and on paper, if applicable) by the Development Services Director.

#### **4.2.E Stormwater Management Panel or Committee**

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

The City of Neosho does not utilize a stormwater management panel or committee.

#### **4.2.F Annual Updates to Governing Board**

*If the permittee has a governing board such as; County Council, City Council, or Board of Curators, a representative of the MS4 Operator, who is familiar with the MS4 Stormwater Program, shall provide an update to the governing board. This shall be conducted at minimum, annually with the status of, or updates on, the Stormwater Management Program, and compliance with the Stormwater Management Program. Co-permittees shall hold a meeting for each co-permittee’s governing body.*

An update will be given annually to the City Council, after the completion of the annual Stormwater Report.

See table on next page.

Annual Updates to Board of Aldermen			
Year to be Reported Upon	Date of update	Method used to update the Board of Aldermen	Name of MS4 representative(s)
2026			
2027			
2028			
2029			
2030			

**4.2.I Adaptive Management**

*Using adaptive management, all MS4 Operators shall review their Public Participation Program, at minimum, annually and update implementation procedures as necessary within the requirements of this permit. This shall be used to review how to best reach the public, the effectiveness of the mechanisms, the effectiveness of reaching the public and the MS4 Governing board and if the community and MS4 government are working together for water quality.*

*Any additional events and/or BMPs shall be acknowledged in the Stormwater Management Program.*

See table on next page.

Annual Review of MCM 2			
Year reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2026			
2027			
2028			
2029			
2030			

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

The City of Neosho has implemented, and enforces, a program to detect and eliminate illicit discharges (as defined in 10 CSR 20-6.200 at 40 CFR 122.26(b)(2)) into the regulated MS4.

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

#### **4.3.A Stormwater & Outfall Mapping**

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

Neosho maintains a storm sewer map that contains:

- the location of All MS4 Outfalls,
- the names and locations of all Waters of the State receiving discharges from the City's MS4 Outfalls, and
- the boundary of the regulated MS4 area (City Limits).

The mapping is available on the City's GIS website at:

<https://neoshogis.integritygis.com/H5/Index.html?viewer=neosho#>

#### **4.3.B Outfall Information Tracking**

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

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

The City's Outfall Mapping utilizes a numbering system for all Outfalls. If additional Outfalls are added during this permit period, the dates will be noted on the mapping. Outfall locations will be verified during IDDE inspections, and the dates will be recorded on the inspection forms.

#### **4.3.C Regulatory Mechanism for Illicit Discharge Prevention**

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

The City of Neosho uses Chapter 430 Article VI (§430.190 through 430.208) of City Code to effectively prohibit illicit discharges to the MS4. This "Illicit Discharge Ordinance" gives the City authority to inspect for illicit discharges and includes enforcement measures. This City Code can be found online at: <https://ecode360.com/28894941>.

#### **4.3.D Dry Weather Field Screening**

*IDDE program will include a dry weather field screening strategy.*

1. *The MS4 Operator shall conduct (or have conducted on their behalf) outfall field assessments. The screening shall be conducted during dry weather conditions (a*

- minimum of 72 hours after the last precipitation event) to check for the presence of a discharge.*
- a. A minimum of 60% of all outfalls shall be screened during the permit cycle.*
  - b. Priority areas, such as those listed in 4.3.H, shall be screened each year.*
- 2. Dry weather screening shall include a checklist or other tracking device to; ensure a complete inspection of each outfall, enhance consistency, and to track the field screening. When discharge is present, the checklist or tracking device shall note the following general observations and physical characteristics at a minimum:*
- a. Date and time;*
  - b. Weather conditions and temperature (air & water);*
  - c. Color of discharge;*
  - d. Estimate of flow rate (this may be noted qualitatively);*
  - e. Odor;*
  - f. Surface scum, algal bloom, floatables or oil sheen present;*
  - g. Deposits or stains (note the color);*
  - h. Turbidity (may be noted qualitatively);*
  - i. Stream impact including vegetation, fish, wildlife;*
  - j. Length of impacted stream; and*
  - k. Notes of an obvious source of flow (such as lawn irrigation, etc.)*

Neosho has implemented an IDDE Inspection program that utilizes dry-weather field screening to detect and address non-stormwater discharges, including discharges from illegal dumping and spills.

Procedures for inspection are contained within the City’s “Illicit Discharge Detection & Elimination Field Investigation Guide,” dated 2023. During field inspections, the City will use an inspection checklist, called the “Illicit Discharge Inspection Field Sheet,” that includes the above-listed minimum observations and physical characteristics.

Physical copies of the IDDE Field Guide and Inspection Field Sheet are used in the field by inspection staff. A copy of the Inspection Field Sheet is included under Appendix MCM 3. A digital copy of the IDDE Field Guide is available on the City’s Stormwater website, <https://neoshomo.gov/209/Stormwater-Management>.

Each outfall will be inspected a minimum of once per permit cycle. Additional inspections may occur if there is a complaint or if a priority area is designated.

Number of IDDE inspections for each year are recorded in the table below.

IDDE Inspections for the Year		
	Amount (% or #) per year of permit cycle	Any specific priority areas included: (See also 4.3.H)
2026		
2027		
2028		
2029		
2030		

#### **4.3.E Diagnostic Monitoring Procedures**

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

Procedures for Illicit Discharge Inspection are contained within the City’s “Illicit Discharge Detection & Elimination Field Investigation Guide,” dated 2023. During field inspections, the City uses an inspection checklist, called the “Illicit Discharge Inspection Field Sheet.”

Digital copies of the IDDE Field Guide and Inspection Field Sheet are available on the City’s Stormwater website, <https://neoshomo.gov/209/Stormwater-Management>. Physical copies of the IDDE Field Guide and Inspection Field Sheet are used in the field by inspection staff.

#### **4.3.F Tracing the Source**

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

Procedures for tracing the source of an Illicit Discharge are contained within the City’s “Illicit Discharge Detection & Elimination Field Investigation Guide,” dated 2023. A digital copy of the IDDE Field is available on the City’s Stormwater website, <https://neoshomo.gov/209/Stormwater-Management>. A physical copy of the IDDE Field Guide is used in the field by inspection staff.

#### **4.3.G Removing the Source**

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

Procedures for removing the source may vary widely, depending on the source and circumstances. Removal procedures may be as simple as a friendly conversation with a property owner. Or a public education campaign may be indicated if the source is determined to be more widespread. Chapter 430 Article VI (§430.190 through 430.208) of City Code authorizes additional, specific enforcement measures for illicit discharge issues. Enforcement procedures in the ordinance include: Notice of Violation, fines, abatement of the problem by the City (or its agent), cost of abatement to be paid by violator, and possible civil action and/or criminal charges, as the situation requires. Appeal procedures are also included in the ordinance. (This City Code can be found online at: <https://ecode360.com/28894941> )

#### **4.3.H Priority Areas**

*In order to prevent further illicit discharge, the MS4 Operator shall identify priority areas such as, but not limited to:*

- *Areas with evidence of ongoing illicit discharges;*
- *Areas with a past history of illicit discharges;*
- *Certain land use influencing stormsewer/ proximity of potential pollutant sources;*

- *Areas of higher population density;*
- *Neighborhoods with onsite sewage systems;*
- *Areas with known litter or dumping issues;*
- *Areas with large or increased number of citizen complaints; d*
- *Industrial areas;*
- *Areas with known illegal encampments.*

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

Record IDDE Inspection Priority Areas on the following table.

	IDDE Inspection Priority Area(s)
2026	
2027	
2028	
2029	
2030	

#### **4.3.I Written Procedures for IDDE Program Implementation**

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

Procedures for implementation of the IDDE Program are contained within the City’s “Illicit Discharge Detection & Elimination Field Investigation Guide,” dated 2023. A digital copy of the IDDE Field Guide is available on the City’s Stormwater website, which is available on the City’s Stormwater website at: <https://neoshomo.gov/209/Stormwater-Management>.

A standard operating procedure (SOP) has been developed specifically for field response when a possible spill or illicit discharge has been reported. A copy of this SOP has also been included in Appendix MCM3.

#### **4.3.J Investigation Timeline**

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

1. Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment.
2. Investigate within five (5) business days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge which does not constitute a threat to human health, welfare or the environment.
3. If illicit connections or illicit discharges are observed related to, discharging to, or discharging from, an adjacent MS4 Operator's municipal storm sewer system, the MS4 Operator must notify the other MS4's Operator within 24 hours of discovery or as soon as practicable.

The City of Neosho will:

1. Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment.
2. Investigate within five (5) business days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge which does not constitute a threat to human health, welfare, or the environment.
3. Notify adjacent MS4 Operators if illicit connections or illicit discharges are observed related to, discharging to, or discharging from, that Operator's municipal storm sewer system. Notification will take place within 24 hours of discovery or as soon as practicable.

Adjacent MS4	Contact person(s)	Phone number/ email
Newton County	Clerk	417.451.8221

#### 4.3.K Enforcement Procedures

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

Enforcement procedures for illicit discharge issues are laid out in Chapter 430 Article VI (§430.190 through 430.208) of City Code. Procedures in the ordinance include: Notice of Violation, fines, abatement of the problem by the City (or its agent), cost of abatement to be paid by violator, and possible civil action and/or criminal charges, as the situation requires. Appeal procedures are also included in the ordinance. (This City Code can be found online at: <https://ecode360.com/28894941> )

A standard operating procedure (SOP) has been developed for Illicit Discharge Enforcement procedures. A copy of this SOP has been included in Appendix MCM3.

#### 4.3.L Database for Tracking IDDE Actions

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

The City of Neosho tracks all field screenings, spill, incidents, and investigations. Records are kept in paper and digital format at City Hall for the entire MS4 permit cycle. Records may be kept longer if deemed necessary.

#### **4.3.M IDDE Education**

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

Public education, for residents and businesses, is covered under part 4.1 of this SWMP. For education of City staff, see section 4.3.Q and 4.6 of this SWMP.

#### **4.3.N Review/Update of IDDE Program**

*All MS4 Operators shall review their IDDE Program, at minimum, annually and update implementation procedures as necessary.*

#### **4.3.O Review/Update of IDDE Program for Existing Permittees**

*Existing permittees shall evaluate their current program to ensure that it is in compliance with this permit.*

- 1. Any revisions to the ordinance or regulatory mechanism shall be complete in the first year of the permit cycle.*
- 2. Maintain an updated map with the items listed above. Items not included in the current map must be added within the first 2 years of the permit cycle.*

**4.3.P** The City of Neosho is not a new permittee, so 4.3P is not applicable.

#### **4.3.Q IDDE Training Program for Field Staff**

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

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

The City of Neosho will provide Illicit Discharge training to all inspection staff and staff who may handle materials which may become an illicit discharge. Training may be conducted in person or using online resources.

1. Each applicable staff member will be trained at minimum within one year of being hired.
2. Applicable staff include:
  - a. IDDE inspection staff;
  - b. Building inspection staff;
  - c. Fleet maintenance staff;
  - d. Staff at facilities with fuel, chemicals, washing of vehicles or equipment;
  - e. Road maintenance staff;
  - f. Road salt/de-icing staff; and
  - g. Parks, swimming pool, or golf course staff who encounter spills, equipment or vehicle washing, fueling, chemicals, etc.

Reviews of the training effectiveness will be considered after municipal site inspections or after an incident occurs. If a certain department or facility did not perform the way they were trained, or if an issue arises that was not handled properly, the City will consider if the training is enough or is ineffective.

Records of IDDE Training will be kept with other staff training records under section 4.6 of this SWMP. Reviews of training effectiveness will also be kept under section 4.6.

**4.3.R Adaptive Management**

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

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

Annual Review of MCM 3			
Year reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2026			
2027			
2028			
2029			
2030			

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

Neosho has implemented and enforces a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre are included in the program if that construction activity is part of a larger common plan of development or sale that would disturb a total one acre or more.

### **4.4.A Regulatory Mechanism**

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

The City of Neosho uses Chapter 430 of City Code as the regulatory mechanism requiring appropriate erosion and sediment controls (ESC) on construction sites. The City regulates sites that disturb one or more acres of land, as well as those sites that disturb less than one acre if the disturbance is part of a larger common plan of development or sale that would disturb a total of one acre or more. Chapter 430 accomplishes the following:

- Regulates pollutants in stormwater runoff from construction activities;
- Lays out procedures for acquiring a Neosho Land Disturbance Permit;
- Establishes legal authority for the City to inspect permitted construction sites;
- Establishes legal authority for the City to enforce the regulations through denial of permit, stop-work orders, revocation of permit, and criminal charges, with associated fines and other penalties.

As additional ESC guidance for contractors/builders and inspectors, the City has adopted a “BMP Manual for Land Disturbance Activities” (created in 2014 by the City of Springfield, MO and adopted by Neosho in 2015 using City Code §430.425). The BMP Manual can be found on the City’s Stormwater website: <https://neoshomo.gov/209/Stormwater-Management>.

It should be noted that the City is in the process of adopting a stormwater design manual to provide water quality regulations covered under MCM 5. Since the Pre-Construction Plan Review and construction inspection processes for MCMs 4 & 5 are combined, the adoption of this design manual will affect certain items listed under MCM 4.

### **4.4.B Pre-Construction Plan Review**

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

The City of Neosho performs pre-construction plan review for developments covered under Chapter 430 of City Code. Article III requires submission and approval of a Preliminary Stormwater Management Plan, then a Final Stormwater Management Plan for each qualifying

development project. Requirements for the Stormwater Management Plans are covered in Article II of Chapter 430.

During pre-construction review, the City, or its agent:

1. Evaluates threats to water quality, taking into account:
  - a. Soil erosion potential;
  - b. Site slope;
  - c. Project size and type;
  - d. Sensitivity of receiving waterbodies;
  - e. Discharge flow type (pipe or sheet flow);
  - f. Location of discharge point in relation to receiving water;
  - g. Proximity of the site to receiving waterbodies; and
  - h. Other factors relevant to the MS4 service area.
2. Will utilize a checklist to ensure consistency and completeness. (This checklist will be developed once the design manual is adopted. Then a copy will be added to Appendix MCM4.)
3. Requires construction site operators to select, install, implement, and maintain appropriate stormwater control measures. This includes temporary BMPs throughout the life of the land disturbance, and permanent BMPs which remain on site as required by local codes and ordinances.
4. Considers ways to minimize disturbed areas through actions such as, phased construction requirements, temporary seeding or sodding, or erosion mats to exposed areas.
5. Requires construction site operators to control construction-site waste that may cause adverse impacts to water quality. (Trash, concrete wash-out, etc.)

#### **4.4.C Authority to Inspect and Enforce**

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

Chapter 430 of City Code establishes authority for site inspection (§430.200 & 430.210) and enforcement (§430.203 through 430.208) of control measures. The City has implemented procedures for inspecting construction/land disturbance projects.

The construction site runoff control program includes the following.

1. Identification of priority sites for inspection based on nature of the construction activity, topography, disturbed area, and the characteristics of soils and sensitivity of, or proximity to, receiving water.
2. Construction site inspections will include assessment of compliance with the City's Stormwater Regulations and other applicable ordinances.
3. The inspections will evaluate any structure that functions to prevent pollution of, or remove pollutants from, stormwater. Inspectors will use enforcement polices to require BMPs to be implemented and effective.
4. Final inspections (upon completion of the land disturbance and prior to final approval of construction project) will ensure all disturbed areas have been stabilized and all temporary erosion and sediment control measures are removed.
5. The inspections conducted by the City's inspector are to be documented with a checklist. The checklist will include structural BMPs. Inspectors will check on the self-inspections which

are to be conducted by the construction site operator. (A copy of the inspection checklist will be included under MCM 4, once developed.)

#### **4.4.D Enforcement Procedures**

*The construction site runoff control program shall include an established, escalating enforcement policy that clearly describes the action to be taken for violations. The program shall have written procedures to ensure compliance with the MS4 Operator's construction site runoff control regulatory mechanism. The MS4 Operator must have a minimum of two (2) enforcement actions.*

Enforcement procedures for construction site runoff problems are laid out in Chapter 430 of City Code (§430.203 through 430.208). Procedures in the ordinance include: Stop-Work Orders, revocation of permit, fines, abatement of the problem by the City (or its agent), cost of abatement to be paid by violator, and possible civil action and/or criminal charges, as the situation requires. Appeal procedures are also included in the ordinance. (This City Code can be found online at: <https://ecode360.com/28894941>.)

A standard operating procedure (SOP) has also been developed specifically for construction inspection and enforcement procedures. A copy of this SOP has also been included in Appendix MCM4.

#### **4.4.E Construction Site Self-Inspection Procedures**

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

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

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

Each construction site covered under the proposed regulatory mechanism is also covered under the Missouri Land Disturbance Permit MO-RA00000. The state permit requires construction site operators to conduct inspections as listed above. When the City performs a stormwater inspection on a construction site, the City's inspectors check these self-inspection records and record the results on the City's stormwater construction inspection checklist. Construction site operators shall keep self-inspection records onsite for City review.

A standard operating procedure (SOP) has been developed specifically for construction inspection and enforcement procedures. A copy of this SOP has also been included in Appendix MCM4.

Note: The 2-year, 24-hour storm event for Neosho has a rainfall depth of 3.84 inches, according to NOAA's Atlas 14, Volume 8, Version 2.

#### **4.4.F Inventory of Active Construction Sites**

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

The City of Neosho maintains an inventory of active public and private land disturbance sites covered under this permit. Inventory information is kept at City Hall.

Inventory information for each active site contains the following:

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

#### **4.4.G Tracking of Oversight Inspections**

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

The City of Neosho tracks oversight inspections (from 4.4.E) by retaining copies of records of inspection checklists. These inventories are available to the Department upon request.

Tracking contains:

1. Inspection dates and time;
2. Inspector name
3. Inspection findings; and,
4. Follow-up actions and dates, including corrective actions and enforcement actions.

#### **4.4.H Review/Update of Construction Site Runoff Control Program for Existing Permittees**

*Review the Stormwater Management Program including ordinances, permitting procedures, review procedures, inspection procedures and enforcement procedures to ensure compliance with these requirements. Any changes necessary to be in compliance with this permit shall be completed within the first year of this permit issuance.*

*The inventory of active sites must be updated as new projects are reviewed and projects are completed. If the MS4 Operator needs to develop this inventory, it shall be completed within one (1) year of this permit issuance*

The City of Neosho will develop a plan review checklist once the design manual is adopted. The design manual is expected to be adopted by September 2027.

**4.4.I** The City of Neosho is not a new permittee, so 4.4.I is not applicable.

#### **4.4.J Public Comment About Land Disturbance Sites**

*The Stormwater Management Program must include procedures for the MS4 Operator to receive and consider information submitted by the public about land disturbance sites. This may be in combination with 4.2.D of this permit.*

Construction plans are available at Neosho’s City Hall for review by the public. Any citizen of Neosho may submit written comments relating to the plans. Written comments can be submitted in person or by mail, or email to the Building Inspector, at Neosho’s City Hall ([tlong@neoshomo.gov](mailto:tlong@neoshomo.gov)). Comments may also be submitted through “Report a Concern” section of the City’s website (<https://www.neoshomo.gov/382/Report-a-Concern>). Comments are tracked electronically (and on paper, if applicable) by the Building Inspector and are to be addressed by the City within 30 days of receipt.

#### **4.4.K Training for Inspection Staff**

*The MS4 Operator shall provide, or support access to, construction site runoff control training for MS4 inspectors and plan reviewers at minimum once during this permit cycle. This education shall be tracked or documented.*

The City of Neosho will provide construction site runoff control (including erosion and sediment control) training to all construction inspection staff and plan reviewers at least once during the permit cycle. Records of this training will be kept with other staff training records under section 4.6 of this SWMP. Reviews of training effectiveness will also be kept under section 4.6.

#### **4.4.L Inspection Procedures**

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

An stormwater construction inspection will be provided during each and every inspection requested by the owner, contractor, or subcontractor. A checklist will be used for these stormwater inspections. The completed inspection checklists are kept at City Hall. Enforcement procedures for construction site runoff problems will be laid out in the proposed regulatory mechanism.

A standard operating procedure (SOP) has also been developed specifically for construction inspection and enforcement procedures. A copy of this SOP has also been included in Appendix MCM4.

#### **4.4.M Adaptive Management**

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

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

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

Annual Review of MCM 4			
Year reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2026			
2027			
2028			
2029			
2030			

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

Neosho is in the process of updating, implementing, and enforcing a program to address the water quality of long-term stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan or sale. The City will accomplish this goal through a stormwater management ordinance requiring any such development project to obtain a Land Disturbance Permit, discussed below, before construction may begin.

Once the updated regulatory mechanism is in place, the City's stormwater program will ensure that permanent controls have been designed and implemented to prevent or minimize water quality impacts.

### **4.5.A Regulatory Mechanism**

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

The City of Neosho regulates sites that disturb one or more acres of land, as well as those sites that disturb less than one acre if the disturbance is part of a larger common plan of development or sale that would disturb a total one acre or more. The City is in the process of updating its regulatory mechanism to better prevent or minimize long-term water quality impacts.

Currently, Chapter 430 of City Code accomplishes the following:

- Lays out procedures for acquiring a Land Disturbance Permit;
- Requires long-term maintenance of permanent BMPs;
- Establishes legal authority for the City to inspect long-term, permanent BMPs;
- Establishes legal authority for the City to enforce the regulations through denial of permit, stop-work orders, revocation of permit, and criminal charges, with associated fines and other penalties.

Specifically, §430.100 requires owners to properly operate and maintain any permanent on-site stormwater runoff control measures (structural or non-structural) that have not been accepted for maintenance by the City. To accomplish this, §430.188 requires a Maintenance Agreement in order to assure perpetual maintenance of permanent stormwater runoff control measures. Thus, maintenance responsibilities are transmitted to subsequent owners through appropriate covenants.

Chapter 430 of City Code establishes authority for site inspection (§430.200) and enforcement (§430.203 through 430.208) of control measures.

The City is in the process of adopting a stormwater design manual, which will contain guidance and requirements for permanent water quality BMPs. The design manual is expected to be adopted by September 2027.

#### **4.5.B Minimization of Water Quality Impacts**

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

##### **1. Structural Controls:**

The design manual will contain provisions for structural stormwater controls. These structural controls will include extended detention basins, grass swales, permeable surfaces, sand filter basins, and other structural BMPs. The manual will include design standards and guidance for designing, installing, implementing, and maintaining stormwater control measures that are designed to infiltrate, evapotranspire, harvest, detain, retain, and/or reuse stormwater. Design standards in the Manual will include regulation of site discharge volumes, rates, durations, and frequency for new development and redevelopment sites, with the intent to minimize the impact of stormwater runoff on water quality.

##### **2. Non-Structural Controls:**

Section 430.199 of City Code requires a stream buffer for developments along Hickory Creek and Buffalo Creek.

The design manual, once adopted, will contain guidelines and rules for other non-structural stormwater controls. Through this mechanism, the City will adopt preventative actions that involve management and source controls. Specific measures/policies/ include:

- Policies and ordinances that provide requirements and standards to direct development to identified areas;
- Protection of sensitive areas such as wetlands and riparian areas;
- Maintain and/or increase open space (which may include a dedicated funding source for open space acquisition);
- Encourage buffer zones along water bodies;
- Minimization of disturbance of soils and vegetation;
- Use of green infrastructure; and
- Minimization of directly connected impervious areas.

#### **4.5.C Pre-Construction Plan Review**

*Pre-construction plan review shall be conducted by the MS4 Operator to assess site characteristics at the beginning of the construction site design phase to ensure adequate planning for stormwater program compliance. The structural or non-structural controls chosen shall; protect sensitive areas, minimize the creation of stormwater pollution, and effectively reduce stormwater pollution. This can be achieved by reasonably mimicking pre-construction runoff conditions on all affected new development projects, or the permittee may achieve this goal through a method more appropriate for its community.*

The City of Neosho performs pre-construction plan review for developments covered under Chapter 430 of City Code. This review is performed in conjunction with the review required under MCM 4.

During review, the City, or its agent, will utilize a checklist to ensure consistency and completeness. Non-structural BMPs (such as comprehensive plans, zoning ordinances, buffer strips, and/or maximization/ preservation of open space) will be evaluated first, once the design manual is adopted. (The checklist will be developed once the stormwater design manual is adopted and a copy will be included under Appendix MCM 4.)

Chapter 430 Article III of City Code requires submission and approval of a Preliminary Stormwater Management Plan, then a Final Stormwater Management Plan for each qualifying development project. Requirements for the Stormwater Management Plans are covered in Article II of Chapter 430.

#### **4.5.D Long-Term Maintenance of Permanent Stormwater BMPs**

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

The City of Neosho uses Chapter 430 of City Code as the regulatory mechanism requiring appropriate long-term operation and maintenance of permanent BMPs. (This City Code can be found online at: <https://ecode360.com/28894792>.) Specifically, §430.100 requires owners to properly operate and maintain any permanent on-site stormwater runoff control measures (structural or non-structural) that have not been accepted for maintenance by the City. To accomplish this, §430.188 requires a Maintenance Agreement in order to assure perpetual maintenance of permanent stormwater runoff control measures. Thus, maintenance responsibilities are transmitted to subsequent owners through appropriate covenants.

Enforcement procedures are laid out in Chapter 430 Article VI (§430.190 through 430.210) of City Code. Procedures in the ordinance include: Notice of Violation, fines, abatement of the problem by the City (or its agent), cost of abatement to be paid by violator, and possible civil action and/or criminal charges, as the situation requires. Appeal procedures are also included in the ordinance. (This City Code can be found online at: <https://ecode360.com/28894941> )

Long-term O&M for BMPs is addressed during the plan review and approval process. Copies of O&M information are to be retained by the party responsible for the post-construction BMP and by the City.

#### **4.5.E Long-Term BMP Inspections**

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

- 1. A minimum of one (1) inspection shall be conducted during construction, and one (1) inspection before the site is finalized, to verify water quality facilities are built as designed and any applicable boundaries or practices for non-structural BMPs are being observed.*

- This may be conducted in combination with MCM 4 inspections. (The MS4 inspector shall have access to the approved plans to ensure proper installation.)*
- 2. A minimum of once in the first three years after the installation, by the MS4 Operator.*
  - 3. Annually by the owner or operator of the post-construction BMP, or by the MS4 Operator. If completed by the BMP owner or operator, this inspection report shall be submitted to the MS4 Operator for evaluation and review.*
  - 4. The MS4 Operator shall inspect a minimum of 60% of all water quality post-construction BMPs within the five year permit cycle. This must include installations with ongoing or open enforcement issues.*

The City of Neosho will begin implementing items 1-4 above once the stormwater design manual (containing water quality requirements) is adopted and there are water quality BMPs to inventory and inspect.

#### **4.5.F Enforcement Procedures**

*The MS4 Operator must maintain a plan designed to ensure compliance with the MS4's post-construction water quality regulatory mechanism. This plan shall include escalating enforcement mechanisms the MS4 Operator will use to ensure compliance.*

*The MS4 Operator must have the authority to initiate a range of enforcement actions to address the variability and severity of noncompliance*

Enforcement procedures are laid out in Chapter 430 Article VI (§430.190 through 430.210) of City Code. Procedures in the ordinance include: Notice of Violation, fines, abatement of the problem by the City (or its agent), cost of abatement to be paid by violator, and possible civil action and/or criminal charges, as the situation requires. Appeal procedures are also included in the ordinance. (This City Code can be found online at: <https://ecode360.com/28894941> )

The range of enforcement actions available to the City will allow it to address the variability and severity of the noncompliance. Any enforcement response by the City takes into account the:

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

The enforcement procedures may start with verbal notice, and education regarding the BMP, before continuing to the Notice of Violation. Enforcement actions will begin within 30 days of discovery of the violation.

#### **4.5.G Enforcement Timeline**

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

Specific procedures for enforcement, including timelines, are laid out in Chapter 430 Article VI (§430.190 through 430.210) of City Code. The enforcement procedures may start with verbal notice, and education regarding the BMP, before continuing to the Notice of Violation stage, but the actions will begin within 30 days of discovery of the violation.

#### **4.5.H Inventory of BMPs**

*The MS4 Operator shall maintain an inventory tracking the water quality post-construction BMPs. This inventory must contain, at a minimum:*

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

The City of Neosho will begin an inventory of water quality BMPs once the stormwater design manual (containing water quality requirements) is adopted. The inventory will then be updated as facilities are added and projects are completed. Inventory will be kept on file with development services.

#### **4.5.I Tracking Post-Construction BMP Inspections**

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

- 1. Inspection dates and time;*
- 2. Inspector name;*
- 3. Inspection findings; and*
- 4. Follow up actions and dates, including corrective actions and enforcement actions.*

The City of Neosho will track BMP inspections by keeping completed inspection checklists on file at City Hall. This will begin as the City implements the Post-Construction BMP Inspection Program from 4.5.E. Inspections will begin once there are water quality BMPs to inspect.

#### **4.5.J Review/Update of Post-Construction BMP Program for Existing Permittees**

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

*The inventory of water quality facilities must be updated as new facilities are added and projects are completed. If the MS4 Operator needs to develop this inventory, it shall be completed within two (2) years of this permit issuance.*

The City of Neosho will adopt and update the stormwater design manual by September 2027. Once this is completed, the City will begin keeping an inventory of permanent BMPs and develop checklists for plan review, and maintenance inspections.

**4.5.K** The City of Neosho is not a new permittee, so 4.5.K is not applicable.

#### **4.5.L Training for Inspection Staff**

*The MS4 Operator shall provide appropriate training for MS4 inspectors at minimum once every permit cycle. This may include Green Infrastructure training, or specific operation of proprietary post-construction BMPs. The MS4 shall provide overall training to explain the function of both structural and non-structural post-construction water quality BMPs.*

Once the stormwater design manual (containing water quality requirements) is adopted, the City of Neosho will provide post-construction BMP inspection training to all relevant inspection staff at least once during the permit cycle. Records of this training will be kept with other staff training records under section 4.6 of this SWMP. Reviews of training effectiveness will also be kept under section 4.6.

#### **4.5.M Adaptive Management**

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

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

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

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

See table on next page.

Annual Review of MCM 5			
Year reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2026			
2027			
2028			
2029			
2030			





## **Stormwater Program Training Schedule**

1. In-Depth Training for Pollution Prevention/Good Housekeeping (PPGH) – MCM6
  - a. Frequency: ANNUAL
  - b. Topics: See table in section 4.6.B.
  - c. Applicable Staff :
    - i. Building maintenance/custodial staff
    - ii. Fleet maintenance staff;
    - iii. Staff at facilities with fuel, chemicals, washing of vehicles or equipment;
    - iv. Road maintenance staff;
    - v. Road salt/de-icing staff; and
    - vi. Parks, swimming pool, or golf course staff who encounter spills, equipment or vehicle washing, fueling, chemicals, etc.
  
2. General Training for Pollution Prevention/Good Housekeeping – MCM6
  - a. Frequency:
    - i. Existing Employees: Initial training
    - ii. New Employees: Within one year of being hired
    - iii. Additional training as needed.
  - b. Applicable Staff: All employees not listed in number 1 above.
  
3. Illicit Discharge Detection and Elimination (IDDE) Training – MCM3
  - a. Frequency:
    - i. Existing Employees: Initial training
    - ii. New Employees: Within one year of being hired
  - b. Applicable staff include:
    - i. IDDE inspection staff;
    - ii. Building inspection staff;
    - iii. Construction inspection staff;
    - iv. Fleet maintenance staff;
    - v. Staff at facilities with fuel, chemicals, washing of vehicles or equipment;
    - vi. Road maintenance staff;
    - vii. Road salt/de-icing staff; and
    - viii. Parks, swimming pool, or golf course staff who encounter spills, equipment or vehicle washing, fueling, chemicals, etc.
    - ix. Police
  
4. Training for Construction Site Runoff Control & Post-Construction Stormwater Management – MCM4 & MCM5
  - a. Frequency: Once per permit cycle (Oct 2026-Sept 2031)
  - b. Applicable staff include:
    - i. Construction Inspection staff;
    - ii. Inspection staff for Long-Term BMP inspections

#### 4.6.B Minimum Topics Covered

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

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

The table below provides a breakdown of topics to be covered in the In-Depth Training for PPGH and the IDDE Training (#1 & #3 of the updated Training Program Schedule). As training is provided, records will be kept in the table.

Table 4.6.B

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

#### **4.6.C Training Materials & Procedures**

*The MS4 Operator shall:*

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

The City of Neosho has updated its current training program and schedule to meet the requirements of the new MS4 permit. A list of current training materials has been included under Appendix MCM6, under the title “Staff Training Resources. Additional resources and materials may be added to the list as needed and/or discovered.

Training will be provided either in-person or by electronic methods. Coordination with other MCMs is shown in the updated Training Program Schedule above. Additional, seasonally appropriate topics for employees may also be covered through email or in-person training, as deemed necessary.

All training will be recorded. Records will be kept for a minimum of 5 years.

#### **4.6.D List of Municipal Operations/Facilities**

*The MS4 Operator shall maintain a list of all municipal operations/facilities that are impacted by this operation and maintenance program.*

The following is a list of all municipal operations and facilities that are impacted by the PPGH program.

- Neosho Public Works - 200 Nelson Ave
- Neosho Recycle Center - 4700 Howard Bush Dr
- Neosho Parks and Recreation - 215 Wheeler St
- Parks:
  - Neosho Municipal Pool - 418 Fairground Road, Neosho
  - Neosho Municipal Golf Course - 1850 Club House Road
  - Big Spring Park - 309 W Spring St, Neosho
  - Lime Kiln Park - Lime Kiln Road, Neosho
  - Hickory Creek RV Park - 304 Washington Avenue, Neosho
  - Scenic Park - 1500 N Main Avenue
  - Hawthorne Park - S. Business 49

#### **4.6.E List of Industrial Facilities Owned and/or Operated by the City**

*The MS4 Operator shall maintain a list of industrial facilities the MS4 Operator owns or operates which are subject to NPDES permits for discharges of stormwater associated with industrial activity. The list shall include the permit number or a copy of the No Exposure Exemption Certification (if applicable) for each facility.*

*This includes Municipal projects with a land disturbance permit, wastewater facilities, airports, etc.*

*NPDES permitted facilities not owned or operated by the permittee are not required to be part of the list, however the MS4 Operator should be familiar with all such facilities in their MS4 service area as they may signify a priority area for the IDDE program.*

The following are industrial facilities owned and/or operated by City of Neosho.

- Hugh Robinson Airport, 1400 Terry Johnson Dr – MDNR MO-0135666

The following are industrial facilities owned by the City of Neosho but operated by Alliance:

Alliance Wastewater Permit MDNR MO-0104906

Alliance Water Plant Permit MDNR MO-5000036-18

- Water Filtration Plant - Kentucky Road
- Sewer Treatment Plant - Scenic Drive
- Neosho Crowder Sewer Treatment Plant - Howard Bush Drive
- North Crowder Water Tower - Kit Carson Ave
- South Crowder Tower - Roark Drive
- City Water Tower - Dewey and Finney
- Crowder Pump Station - Doniphan Dr.
- Baxter Tower & Pump Station - Baxter/86 Hwy.

#### **4.6.F Controls for Reducing or Eliminating Floatables and Pollutant Discharge**

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

The City of Neosho has developed a series of Stormwater Pollution Prevention Plans (SWPPPs) to act as guides for the prevention and reduction of pollution in stormwater runoff from municipal facilities and operations. Some SWPPPs will be for individual facilities and some for a certain type of facility (such as parks). Each facility listed in 4.6.D will have an associated SWPPP. The SWPPPs will cover the following.

1. List of potential pollutant sources at each facility in the SWPPP, including materials used and stored on site.
2. PPGH inspections of the facility (or facilities) for stormwater issues, to occur least once per year.
  - a. Records will be kept for inspections and follow up. Records will mostly consist of facility inspection checklists.
3. Use of structural controls/BMPs to reduce or prevent pollutants from entering waters of the state or into another MS4 where needed.
  - a. A map with descriptions of these BMPs will be maintained for each facility.
4. All paints, solvents, petroleum products, and petroleum waste products (except fuels) under the control of the City are to be stored so these materials are not exposed to stormwater.
5. Sufficient practices of spill prevention, control, and/or management are provided to prevent any spill of these pollutants from entering Waters of the State;
  - a. This includes spill kits when liquid product is stored at a facility; and

- b. Any containment system used to implement this requirement is constructed of materials compatible with the substances contained and also prevents the contamination of groundwater.
6. Tracking of rock salt/brine or other deicer usage, if applicable.
7. Maintaining municipal salt storage area(s) (if applicable) after use of rock salt, at minimum:
  - a. Sweep and/or shovel spillage in loading area and storage area, and
  - b. Unload salt hoppers or keep under cover when salt is in the hopper.

The City of Neosho has developed the following items:

- Stormwater Pollution Prevention Plans
- Inspection Checklists for each municipal facility listed in 4.6.D.
- Maps of BMPs at each municipal facility listed in 4.6.D.

Copies of the applicable SWPPP are kept at each facility listed under 4.6.D above, and copies can be made available upon request.

#### **4.6.G Procedures for Proper Disposal of Waste**

*The MS4 Operator shall have procedures for proper disposal of waste removed from the MS4 structures and areas of jurisdiction. This waste, shall include at minimum, if applicable to the permittee:*

1. *Street sweeper spoils and washout;*
2. *Accumulated sediment;*
3. *Dredged materials;*
4. *Floatables, trash and litter;*
5. *Leaves, other organic matter; and*
6. *Other debris.*

The above topics are included in the proposed SWPPPs. Copies of the applicable SWPPP are kept at each facility listed under 4.6.D above, and copies can be made available upon request.

#### **4.6.H Washing of Municipal Vehicles and Equipment**

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

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

Vehicle and equipment washing is covered in the proposed SWPPPs. Copies of the applicable SWPPP will be kept at each facility listed under 4.6.D above, and copies can be made available upon request.

#### **4.6.I Written Controls, Procedures, Inspection Schedules, Tracking, Annual Review**





**4.6.J Flood Management Projects**

*The MS4 Operator shall maintain procedures to determine if there are impacts to water quality for new flood management projects, if applicable. Any flood management projects shall require the protection of water quality in the standards that are used to plan, design, build, and maintain stormwater infrastructure. Flood management projects are those projects developed or designed to reduce flooding.*

Any new flood management projects will be subject to the water quality standards that will be established in the proposed stormwater design manual discussed in 4.5.A. The design manual is expected to be adopted by September 2027. All projects will undergo the pre-construction review for water quality impacts.

Flood management projects in the Plan Area can include:

- Regional storm water control (retention basins, detention basins);
- Flood control levees and associated pump stations;
- Storm water drainage conveyance capacity improvements;
- Projects involving land buyouts; and
- Designated uses of floodplain land.

Have there been any such flood management projects to review?		
Year	Yes/no	If yes, the location(s)
2026		
2027		
2028		
2029		
2030		

**4.6.K Review/Update of Pollution Prevention/Good Housekeeping Program for Existing Permittees**

*Existing permittees: Shall evaluate the current Stormwater Management Program including training, inspection procedures, and other municipal operation procedures to ensure compliance with these requirements. Any changes necessary to be in compliance with this permit shall be completed within one (1) year of this permit issuance.*

The City of Neosho has developed the following items:

- Stormwater Pollution Prevention Plans
- Inspection Checklists for each municipal facility listed in 4.6.D.
- Maps of BMPs at each municipal facility listed in 4.6.D.

**4.6.L** The City of Neosho is not a new permittee, so 4.6.L is not applicable.



Annual Review of MCM 6			
Year reviewed	Date of review	Reviewer(s)	Were changes made and noted?
2026			
2027			
2028			
2029			
2030			

# Part 5 – Monitoring, Recordkeeping, and Reporting

## 5.2 Recordkeeping

*All records required by this permit may be maintained electronically, as long as they are accessible upon request by the Department. If a non-electronic version is kept, the permittee shall retain the most recent versions of the records and shall be accessible to the Department upon request.*

## 5.3 MS4 Stormwater Management Program Report

- A. A report to the Department on the status of the MS4's program is **due annually on** or before **February 28th**. This report shall cover the previous year from **January 1<sup>st</sup> to December 31<sup>st</sup>**. The report shall be submitted on the Department approved, MS4 Stormwater Management Program Report form. If approved by the Department, permittees may submit the MS4 Stormwater Management Program Report using an alternative report format.
- B. The annual reports must be submitted through the eDMR system. This is accessible through the Missouri Gateway for Environmental Management (MoGEM): <https://dnr.mo.gov/mogem/>

Which City Staff have access to the eDMR system?	
NAME	Role in the eDMR system
	Organization Official
Adam Worster	Certifier
Sarah Simon (Allgeier, Martin and Associates, Inc.)	Preparer